4.0 Environmental Analysis

The following sections analyze the potential environmental impacts that may occur as a result of project implementation. The environmental issues subject to detailed analysis in the following sections include those that were identified by the City through preliminary project review and in response to the NOP as potentially significant.

Thirteen environmental issues are addressed in the following sections, and in accordance with the City's 2005 EIR Guidelines, the issue of land use is addressed first and followed by the remaining issues in order of descending significance. However, for some issues, relative significance of impacts is roughly equal; thus, the ordering of issues contained in Section 4.0 comprises an approximate and subjective prioritization of impact significance. The 13 environmental issues addressed in Section 4.0, in sequential order, include:

- Land Use
- Traffic Circulation
- Biological Resources
- Noise
- Historical Resources
- Paleontological Resources
- Visual Quality/Neighborhood Character/Landform Alteration
- Health and Safety/Hazardous Materials
- Air Quality
- Greenhouse Gas Emissions
- Public Services and Facilities
- Public Utilities
- Energy

Each issue analysis section is formatted to include a summary of existing conditions, the criteria for the determination of impact significance, evaluation of potential project impacts, a list of required mitigation measures if applicable, and conclusion of significance after mitigation for impacts identified as requiring mitigation.

All potential direct and indirect impacts in Section 4.0 are evaluated in relation to applicable City, state, and federal standards, as reflected in the City's Significance Determination Thresholds (January 2011), and include City goals and standards for each environmental issue that are largely in compliance with the City General Plan (March 2008). Where the General Plan includes updated standards, those are additionally considered in the impact evaluation in Section 4.0.

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4.1 Land Use

This section addresses the consistency of the project with the development regulations of the City General Plan, SMRCP, MSCP Subarea Plan, MCAS Miramar ALUCP, and LDC. The determination of significance regarding any inconsistency with development regulations or plan policies is evaluated in terms of the potential for the inconsistency to result in the creation of secondary environmental impacts considered significant under CEQA. The compatibility of the project with surrounding land uses and community character is addressed in Section 4.7, Visual Quality/Neighborhood Character/Landform Alteration.

4.1.1 Existing Conditions

4.1.1.1 Existing Land Use Plans and Development Regulations

a. City of San Diego General Plan

State law requires each city to adopt a general plan to guide its future development, and mandates that the plan be periodically updated to assure its continuing relevance and value (State Planning and Zoning Law, California Government Code, Section 635300). State law also requires the inclusion of seven mandatory elements into the General Plan (land use, circulation, housing, conservation, noise, open space, and safety), but permits flexibility and the inclusion of optional elements to best meet the needs of a particular city.

The City's General Plan sets forth a comprehensive, long-term plan for development within the City. A comprehensive update of the City's General Plan was adopted March 10, 2008, and was based on a new planning strategy for the City developed in the 2002 Strategic Framework Element. Known as the City of Villages strategy, the General Plan aims to redirect development away from undeveloped lands and toward already urbanized areas and/or areas with conditions allowing the integration of housing, employment, civic, and transit uses. This development strategy mirrors regional planning and smart growth principles intended to preserve remaining open space and natural habitat and focus development within areas with available public infrastructure.

The Strategic Framework comprises the introductory chapter of the new General Plan, followed by 10 elements (descriptions of the elements that apply to the project are provided in the following paragraphs).

- Land Use and Community Planning
- Mobility
- Urban Design
- Economic Prosperity
- Public Facilities, Services, and Safety
- Historic Preservation
- Recreation
- Conservation
- Noise
- Housing

The **Land Use and Community Planning Element** (Land Use Element) provides policies to implement the City of Villages strategy within the context of the City's community planning program. The element addresses land use issues that apply to the City as a whole and identifies the community planning program as the mechanism to designate land uses, identify site-specific recommendations, and refine citywide policies as needed. The Land Use Element establishes a structure for the diversity of each community and includes policy direction to govern the preparation of community plans. The element addresses zoning and policy consistency, the plan amendment process, airport-land use planning, balanced communities, equitable development, and environmental justice.

The project site is currently identified in the General Plan's Land Use and Street System Map (contained in the Land Use and Community Planning Element) as Institutional and Public and Semi-public Facilities and Park, Open Space, and Recreation (Figure 4.1-1). In addition, the General Plan Land Use Element identifies the project site as having a low to medium propensity for village development (Figure 4.1-2). Factors considered in locating village sites and ranking village propensity include community plan-identified capacity for growth; existing public facilities or an identified funding source for facilities; and an existing or identified funding source for transit service, community character, and environmental constraints. Village propensity also takes into consideration the location of parks, fire stations, and transit routes. By overlaying the facilities factors with the land uses, the Village Propensity Map of the General Plan illustrates existing areas that already exhibit village characteristics, and areas that may have a propensity to develop as village areas.

The **Mobility Element** contains policies that promote a balanced, multi-modal transportation network while minimizing environmental and neighborhood impacts. In addition to addressing walking, streets, and transit, the element also includes policies related to regional collaboration, bicycling, parking, the movement of goods, and other components of the transportation system.

Urban Design Element policies call for development that respects the City's natural setting; enhances the distinctiveness of neighborhoods; strengthens the natural and built linkages; and creates mixed-use, walkable villages throughout the City. The Urban Design Element addresses urban form and design through policies relative to the City's natural environment that work to preserve open space systems and target new growth into compact villages.

The **Public Facilities, Services, and Safety Element** is directed at providing adequate public facilities through policies that address public financing strategies, public and developer financing responsibilities, prioritization, and the provision of specific facilities and services that must accompany growth. The policies within the Public Facilities Element also apply to transportation and park and recreation facilities and services.

Image source: SanGIS (flown May 2012)

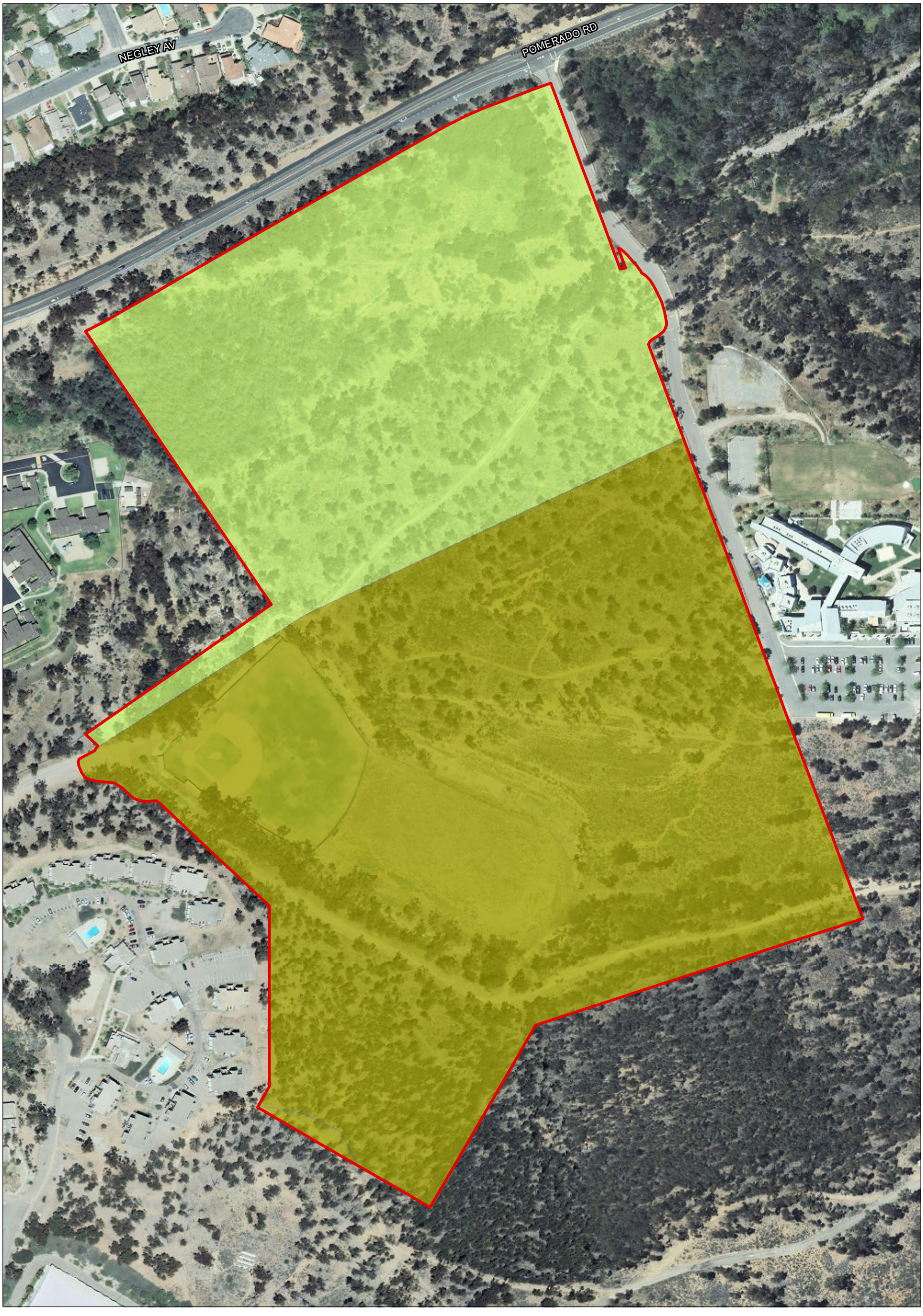

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FIGURE 4.1-1
General Plan Land Use

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Map Source: City of San Diego

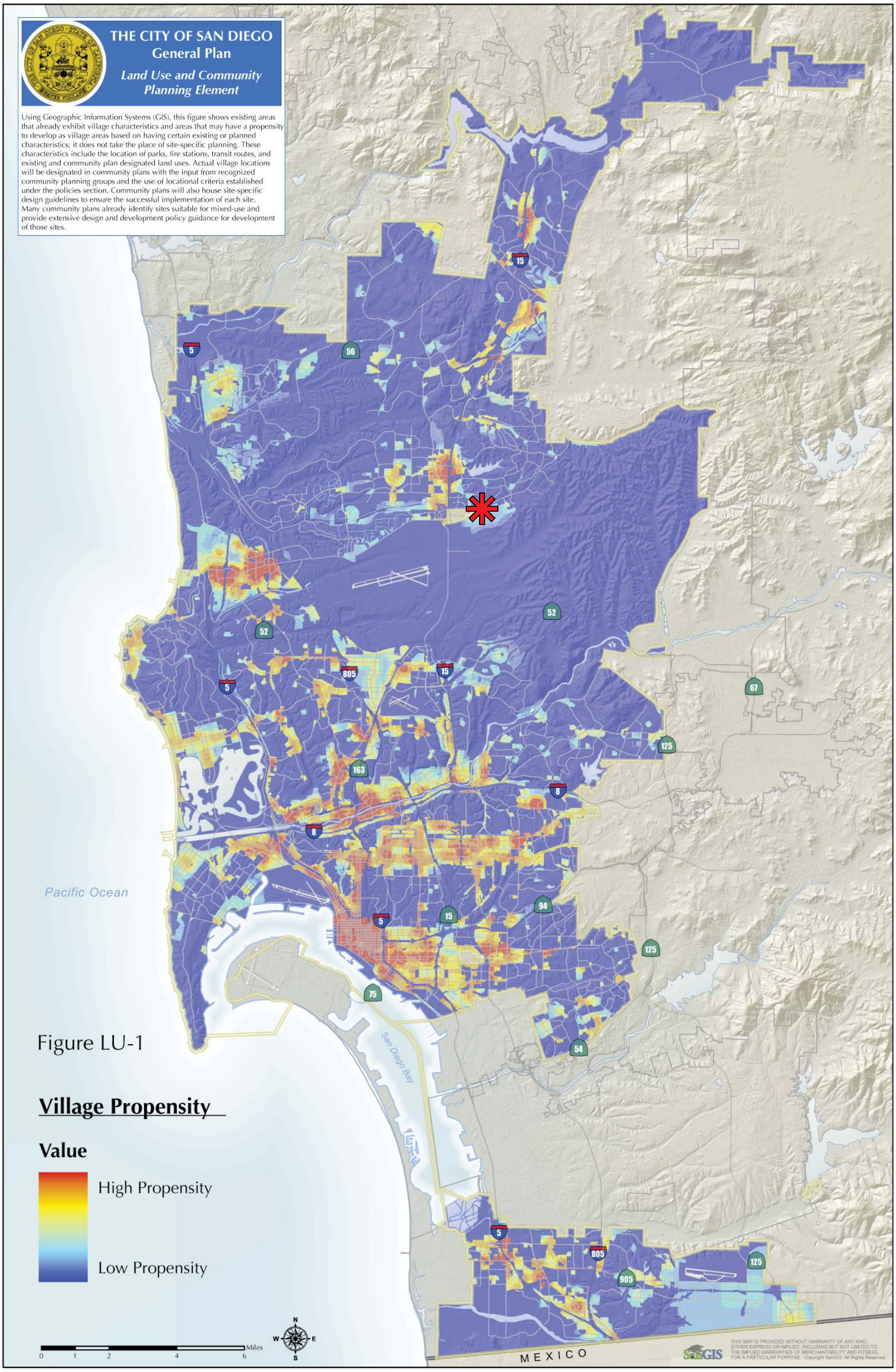

Figure LU-1

0 Miles 3

Project Location

FIGURE 4.1-2
General Plan Village Propensity

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The **Conservation Element** contains policies to guide the conservation of resources that are fundamental components of the City's environment, that help define the City's identity, and that are relied upon for continued economic prosperity. The City's resources include, but are not limited to water, land, air, biodiversity, minerals, natural materials, recyclables, topography, viewsheds, and energy.

The **Historic Preservation Element** guides the preservation, protection, restoration, and rehabilitation of historical and cultural resources.

The **Noise Element** provides goals and policies to guide compatible land uses and the incorporation of noise attenuation measures for new uses to protect people living and working in the City from an excessive noise environment.

The separately adopted 2013-2020 **Housing Element** is intended to assist with the provision of adequate housing to serve San Diegans of every economic level and demographic group. The updated housing element was adopted in March 2013.

b. Scripps Miramar Ranch Community Plan

Community plans provide the level of information that is needed to review and assess proposed public and private development projects. However, community plans are policy documents that do not contain regulatory requirements. Regulatory requirements are contained in the LDC, as explained below.

Originally approved in 1978, the SMRCP was most recently revised in February 2008. The SMRCP includes objectives and proposals to ensure quality site design consistent with the General Plan and appropriate to the community. The SMRCP contains the following 11 elements; those elements relative to the project are briefly described below.

- Residential
- Commercial
- Industrial
- Parks, Recreation, and Open Space
- School
- Public Facilities and Services
- Transportation
- Community Environment
- Social Needs
- Design
- Implementation

The **Residential Element** contains objectives and proposals to guide the long-range residential development of the Scripps Miramar Ranch community. This element also establishes the range of allowable dwelling unit densities for various categories of residential land use. In addition to specifying allowable densities, the Residential Element includes proposals to assure that residential developments include adequate open space and are designed to respect existing development with regard to preservation of views and compatibility of architectural styles, building materials, and landscaping.

The **Parks, Recreation, and Open Space Element** contains proposals that promote a balanced and aesthetically pleasing system of open space and recreational facilities and opportunities focusing on maximizing preservation of existing mature eucalyptus groves, natural slopes, and major canyons through careful siting of roadways and structures. This element proposes a system of open space, tot lots, neighborhood parks, community parks, and resource-based parks.

The **School and Public Facilities and Services Elements** are directed at providing adequate public facilities to community residents through proposals that address public financing strategies, public and developer financing responsibilities, prioritization, and the provision of specific facilities and services.

The **Transportation Element** contains proposals to provide an efficient and aesthetically pleasing transportation system for vehicular, bicycle, equestrian, and pedestrian traffic within the community and to the greater metropolitan area. This element emphasizes efficiency as well as diversity within the Scripps Miramar Ranch circulation system. Proposals are included that are aimed at alleviating current traffic congestion and providing a continuous pedestrian, equestrian, and bicycle system in conjunction with open space areas.

The **Community Environment Element** contains objectives to ensure a desirable, healthful, and comfortable living and working environment while preserving the community's natural resources and amenities. This element encourages types and patterns of development which minimize the problems of air and water pollution, natural fire hazards, soil erosion, siltation, slope instability, flooding, and severe hillside cutting and scarring. This element encourages compatible land uses adjacent to open spaces and habitats.

The **Social Needs Element** contains objectives to maintain and amplify the special quality of life that exists in Scripps Miramar Ranch, with emphasis on both community and individual needs, ensuring the optimal and most efficient social and economic use of human and physical resources, and assisting a family in obtaining the assets needed to nurture all its members to a full and productive existence.

The **Design Element** contains objectives to ensure that future development within the community will promote a positive community identity, allow for reasonable freedom of design expression, and maintain the character of existing development.

In addition to community-specific policies, the SMRCP contains an **Implementation Element** outlining methods and discretionary review requirements necessary to accomplish the design criteria and goals of the SMRCP.

The project site is designated as University use in the SMRCP. The project would amend the existing CUP to allow for the project, and redesignate the site from University to Institutional use in the SMRCP.

c. MCAS Miramar Airport Land Use Compatibility Plan

The MCAS Miramar ALUCP was prepared by the Airport Land Use Commission and provides airport land use compatibility policies and criteria for the City to implement with its land use plans and zoning. Any proposed land use plan amendments or rezones within the Airport Influence Area (AIA) are required by state law to be submitted to the Airport Land Use Commission for a consistency determination with the ALUCP. The purpose of an ALUCP is to provide for the orderly growth of airports and the areas surrounding the airports, and to safeguard the general welfare of inhabitants within an airport's vicinity. An ALUCP addresses compatibility between airport operations and future land uses that surround them by providing policies and criteria for aircraft overflight, noise, safety, and airspace protection, to both minimize the public's exposure to excessive noise and safety hazards within the AIA and to preserve the viability of airport operations. The AIA Review Area 1 is generally composed of aircraft overflight area, noise contour (60 Community Noise Equivalence Level (CNEL) and greater), accident potential, and FAA Part 77 airspace protection surfaces. The AIA Review Area 2 is generally composed of aircraft overflight area and the FAA Part 77 airspace protection surfaces.

The MCAS Miramar runways are approximately 2.5 miles southwest of the project site. The adopted ALUCP for MCAS Miramar contains policies that prohibit residential uses in areas above the 65 CNEL contour and require noise attenuation to reduce interior noise levels to 45 CNEL for residential uses in the 60 to 65 CNEL zones. The project lies approximately half a mile north of the 60 CNEL contour and is outside the aircraft overflight area. However, the project site is located within the MCAS Miramar AIA Review Area 2, and is subject to ALUCP airspace protection policies.

d. Land Development Code Regulations

Chapters 11 through 14 of the City's Municipal Code are referred to as the LDC, as they contain the City's planning, zoning, subdivision, and building regulations that dictate how land is to be developed within the city. The LDC contains citywide base zones that specify permitted land use, density, floor-area ratio, and other development requirements for given zoning classifications; as well as overlay zones and supplemental regulations that provide additional development requirements.

Development of the project site is subject to the requirements of the RS-1-8 base zones. The project is also subject to the supplemental regulations of the ESL Regulations; supplemental development regulations contained with the Airport Land Use Compatibility Overlay Zone, Chapter 13, Division 15; and the many general development regulations pertaining to landscaping, lighting, grading, parking, signage, etc.

Chapters 13 (Zones) and 14 (General Regulations) are of particular relevance to development of the project. Chapter 13, Zones, includes the applicable development regulations for the base zones of the project site.

Chapter 14 of the LDC includes the general development regulations, supplemental development regulations, subdivision regulations, building regulations, and electrical/plumbing/mechanical regulations that govern all aspects of project development. The grading, landscaping, parking, signage, fencing, and storage requirements are all contained within the Chapter 14 general regulations. Also included within the general regulations of Chapter 14 are the ESL Regulations, discussed below. All other applicable land development regulations are discussed throughout this EIR, particularly in Sections 3.0 (Project Description) and 4.0 (Environmental Analysis).

Base Zones

The underlying base zone for the project site is (Residential—Single Unit) RS-1-8 (Figure 4.1-3). The LDC Chapter 13, Zones, includes use and development regulations pertinent to the base zone classifications. In terms of use regulations, the RS-1-8 base zone allows single-dwelling units, active and passive recreation, natural resources preservation, and a mix of light industrial and office uses with limited commercial (Municipal Code, Section 131.0603). As discussed in Section 3.2, the project is considered to be most similar to a Residential Care Facility. Residential Care Facilities are permitted in RS-1-8 zones.

Environmentally Sensitive Lands Regulations

The ESL Regulations were adopted by ordinance as a part of the LDC (Municipal Code). The purpose of the ESL regulations is

> to protect and preserve environmentally sensitive lands and the viability of the species supported by those lands. The regulations are intended to assure that development occurs in a manner that protects the overall quality of the resources and the natural and topographic character of the area. (Municipal Code, Chapter 14, Article 3: Supplemental Regulations, Division 1: Environmentally Sensitive Lands Regulations, Section 143.0101 et seq.)

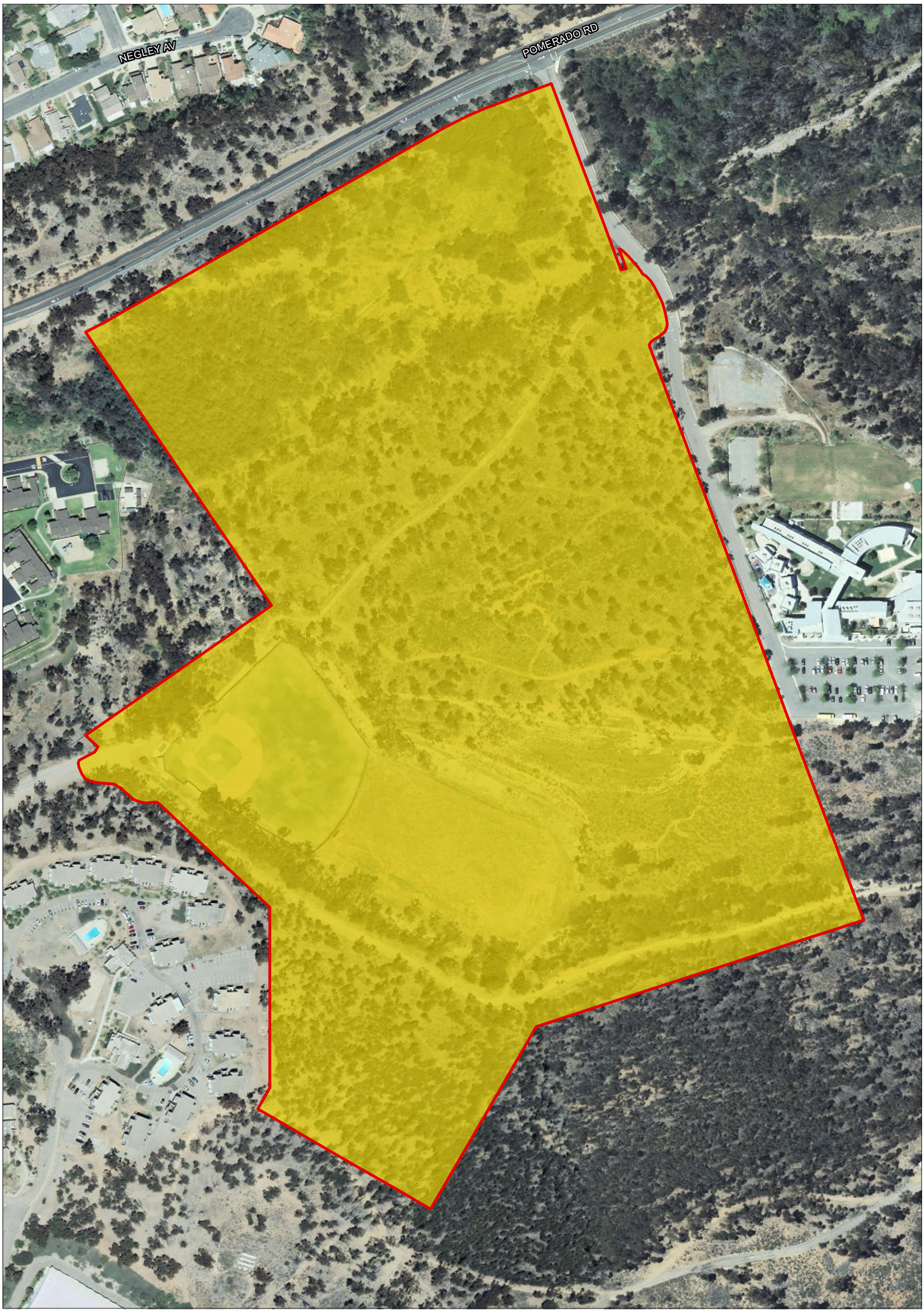
The project site is subject to the ESL Regulations because it contains sensitive biological resources, steep slopes, and the 100-year floodplain of the Carroll Canyon drainage. As described in Section 3.0 of this EIR, the project includes an SDP for development affecting ESL.

e. Multiple Species Conservation Program Subarea Plan

The project site lies within the City's MSCP Subarea, partially within the City's MHPA, and partially adjacent to the City's MHPA (see Figure 3-4).

The MSCP is a comprehensive program to preserve a network of habitat and open space in the region. Large blocks of native habitat having the ability to support a diversity of plant and animal life are designated as MHPAs. MHPA lands are those that have been included within the City's MSCP Subarea Plan for habitat conservation. These lands have been determined to provide the

Image source: SanGIS (flown May 2012)



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Project Boundary **City of San Diego Zoning**

RS-1-8

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FIGURE 4.1-3
Project Base Zones

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necessary habitat quality, quantity, and connectivity to sustain the unique biodiversity of the San Diego region. MHPA lands are considered by the City to be a sensitive biological resource. The City's MSCP Subarea Plan provides Land Use Adjacency Guidelines (Guidelines) to avoid or reduce significant indirect impacts to MHPAs from adjacent land uses. The Guidelines include drainage, lighting, noise, and slope grading recommendations for adjacent development, as well as recommendations for avoiding or redirecting toxic chemicals (e.g., from landscape or agricultural fertilization) and prohibition of the planting of invasive species. New development adjacent to the MHPA may also be required to provide barriers along the MHPA boundary to direct public access to appropriate locations and reduce domestic animal predation.

4.1.2 Significance Determination Thresholds

Based on the City's 2011 Significance Determination Thresholds, impacts related to land use would be significant if the project would:

1. Result in a conflict with the environmental goals, objectives, or recommendations of the General/Community Plan in which it is located;

2. Require a deviation or variance, and the deviation or variance would in turn result in a physical impact on the environment;

3. Conflict with the provisions of the City's MSCP Subarea Plan or other approved local, regional, or state habitat conservation plan;

4. Result in land uses which are not compatible with an adopted ALUCP.

5. Result in the exposure of people to noise levels which are incompatible with the Noise Compatibility Guidelines (Table NE-3) in the Noise Element of the General Plan;

6. Result in land uses which are not compatible with aircraft noise levels as defined by an adopted ALUCP.

As stated in the City's Thresholds, project inconsistency or conflict with a plan does not in and of itself constitute a significant environmental impact. The plan or policy inconsistency would have to result in a physical effect on the environment to be considered significant pursuant to the City's guidelines and CEQA.

4.1.3 Issue 1: General and Community Plan Consistency

Would the project result in a conflict with the environmental goals, objectives, or recommendations of the General/Community Plan in which it is located?

4.1.3.1 Impacts

a. Land Use Designation

The project site is currently designated as “Institutional and Public and Semi-Public Facilities” and “Park, Open Space, and Recreation” in the General Plan’s Land Use and Street System Map (contained in the Land Use and Community Planning Element). The project site is designated University use in the SMRCP, which is an institutional use. While the project is an institutional use, a CPA is proposed to clarify the type of institutional use and would allow for the development of CCRCs through a PDP. The CPA would also detail the location of the existing MHPA on the project site.

b. Plan Objectives and Proposals

The General Plan provides goals and policies that guide the development of Community Plans, as well as growth and development citywide. Most of the General Plan’s goals are implemented through policy established in the SMRCP; however, there are also some General Plan policies that relate directly to the project. General Plan Elements and issues that relate specifically to the project include Land Use; Mobility; Urban Design; Public Facilities, Services, and Safety; Historic Preservation; Recreation; and Noise.

The SMRCP also provides objectives, goals, and policies specific to the SMRCP area. SMRCP Elements and issues that relate specifically to the project include Residential; Parks, Recreation, and Open Space; Public Facilities and Services; Transportation; Community Environment; Social Needs; and Design.

Table 4.1-1 (located at the end of this section) provides a summary analysis of the project’s consistency with the SMRCP and the General Plan. The table identifies relevant goals and policies of those General Plan and SMRCP Elements and provides an analysis of the project’s consistency.

As demonstrated in Table 4.1-1, the project would be consistent with most of the applicable General Plan and SMRCP goals, objectives, and policies. However, the project would result in significant direct and cumulative impacts to Pomerado Road as a result of the increase in traffic. Since Pomerado Road cannot be widened to four lanes (see Section 4.2), direct and cumulative traffic impacts would remain significant and unmitigated. This would also result in a conflict with General Plan and SMRCP goals of alleviating traffic in the region, and would result in a significant land use impact. This issue is discussed in greater detail in Section 4.2, Traffic Circulation.

4.1.3.2 Significance of Impacts

Overall, the project would be consistent with most of the City’s General Plan and SMRCP goals, policies, and objectives. However, the increase in traffic on Pomerado Road would be significant

and unavoidable, conflicting with goals of alleviating traffic in the region. Therefore, impacts would be significant.

4.1.3.3 Mitigation, Monitoring, and Reporting

As discussed in detail in Section 4.2.3.3, widening Pomerado Road to four lanes would mitigate the traffic impacts. However, the City and Scripps Miramar Ranch Planning Board determined that they did not want to widen Pomerado Road east of Scripps Ranch Boulevard to four lanes. Therefore, direct and cumulative traffic impacts would remain significant and unmitigated.

4.1.3.4 Significance of Impacts after Mitigation

Since Pomerado Road cannot be widened to four lanes, as described above, significant direct and cumulative impacts would remain significant and unmitigated.

4.1.4 Issue 2: LDC Compliance

Would the project require a deviation or variance, and would the deviation or variance in turn result in a physical impact on the environment?

4.1.4.1 Impacts

The following discussion evaluates the project's consistency with applicable development regulations of the LDC. Because the project is requesting deviations from selected development regulations, analysis is provided that evaluates the project design (including the proposed deviations) relative to potential effects on surrounding land use.

a. Deviation from Height Requirement

The RS-1-8 base zone restricts maximum structure heights to 35 feet above the lower of existing or proposed grade (LDC, Table 131.04 G). The project proposes a maximum height of 50 feet above existing grade for the residential structures. Thus, the project would not be consistent with the base zone RM-1-8 requirements regarding structure height. The proposed deviation to allow for a maximum height of 50 feet is requested in order to allow for greater architectural flexibility for building articulation and roofline variation.

Section 4.7, Visual Quality/Neighborhood Character/Landform Alteration, of this EIR provides an evaluation of the proposed height, bulk, and scale of the project relative to the issue of visual quality and compatibility with surrounding existing and planned development. As discussed in that section and shown in visual simulations, the project would result in minor alterations to existing visual characteristics of the site from vantage points on Pomerado Road. Rooftops of the proposed buildings would be visible at a distance from Pomerado Road. The height of the proposed buildings would not result in a substantial view blockage from Pomerado Road. The proposed buildings would be set back by over 650 feet south of Pomerado Road, preserving the existing vegetation and landform of Carroll Canyon and the open space located between

Pomerado Road and the proposed buildings. Due to the topography and intervening vegetation, the buildings would not be highly visible from Pomerado Road or other public locations. As such, the project would not conflict significantly with the height, bulk, and coverage regulations.

b. Deviation from Steep Slopes

Figure 3-7 shows the steep slopes on the project site. The project site contains 3.71 acres of slopes in excess of 25 percent, which is approximately 7 percent of the total project site. Project grading would encroach into 3.34 acres of steep slopes (90 percent of the steep slope acreage on-site). The encroachment in slopes greater than 25 percent would result from grading at the southern portion of the project site.

The LDC contains Steep Hillside Guidelines that provide standards and guidelines intended to assist in the interpretation and implementation of the development regulations for steep hillsides contained in Chapter 14, Article 3, Division 1, ESL. The project would encroach into steep hillsides, and is therefore subject to the ESL regulations and was evaluated for conformance with the Steep Hillside Guidelines. The Steep Hillside Guidelines contain design standards that must be incorporated into the project design, and projects proposing to encroach into steep hillsides shall demonstrate that all design standards have been incorporated and have resulted in the most sensitive design possible. The project's conformance with the Steep Hillside Guidelines design standards are discussed in detail in Section 4.7. As demonstrated on the grading plans and discussed in Section 4.7, the proposed landforms would closely imitate the existing on-site landform and the undisturbed, pre-existing surrounding neighborhood landforms.

4.1.4.2 Significance of Impacts

Proposed deviations from height requirements would not result in significant direct or secondary environmental effects. While the proposed height deviations comprise inconsistencies with the LDC development regulations, the inconsistencies would not result in negative or significant impacts as described. Impacts associated with height requirements would be less than significant. Additionally, Steep Hillside Guidelines design standards have been incorporated into the project design and impacts associated with steep slope requirements would be less than significant.

4.1.4.3 Mitigation, Monitoring, and Reporting

Impacts would be less than significant. No mitigation is required.

4.1.5 Issue 3: MSCP/MHPA Consistency

Would the project conflict with the provisions of the City's MSCP Subarea Plan or other approved local, regional, or state habitat conservation plan?

4.1.5.1 Impacts

MHPA lands are those that have been included within the City's MSCP Subarea Plan for habitat conservation. A portion of the project site is within the City's MHPA, and the majority of the site is adjacent to MHPA (see Figure 3-4).

The MHPA has been designed to maximize conservation of sensitive biological resources, including sensitive species. When land is developed adjacent to the MHPA, there is a potential for indirect impacts, or edge effects, that may degrade the habitat value or disrupt animals within the preserve area. These impacts could be short-term, resulting from construction activities, or long-term. Short-term construction impacts could result in disruption of nesting and breeding, and could thus affect the population of sensitive species. Long-term impacts would be associated with drainage, toxins, lighting, noise, invasives, brush management, access to MHPA, and grading/land development. Impacts to the MHPA as a result of edge effect would be considered significant.

a. MHPA Boundary Line Adjustment

The MHPA Boundary Line Adjustment is shown on Figure 3-4. The project's encroachment into 1.87 acres of the MHPA would require an MHPA BLA and an equivalency determination to ensure that mitigation is provided "in-kind" and that there is no net loss of MHPA area. The equivalency determination as analyzed in the biological technical report (see Section 4.3) identifies that approximately 7.46 acres (net gain of 5.59 acres) would be preserved as MSCP land via a Covenant of Easement. As a result of this on-site land exchange, the MHPA land on-site would total 9.90 acres. The MHPA boundary line adjustment would be beneficial to the overall MHPA at this location, as it would increase Tier II habitat acreage of preserved land. This land exchange would comply with overall MSCP policies in that it would result in equal or higher biological values of species and habitats.

b. Land Use Adjacency

The MHPA Land Use Adjacency Guidelines contain policies related to controlling edge effects on the MHPA (i.e., drainage, toxins, lighting, noise, barriers, invasives, and brush management). A description of the MHPA Land Use Adjacency Guidelines policies and a description of the project's compliance is provided below.

1. Drainage

All new developed areas within and adjacent to the preserve must not drain directly into the MHPA. All developed and paved areas must prevent the release of toxins, chemicals, petroleum products, exotic plant materials, and other elements that might degrade or harm the natural environment or ecosystem processes within the MHPA. If this is not possible, runoff should be filtered before draining into MHPA land. This can be accomplished using a variety of methods, including natural detention basins, sedimentation basins, grass swales, or mechanical trapping

devices. These systems should be maintained approximately once a year, or as often as needed, to ensure proper functioning. Maintenance should include dredging out sediments if needed, removing exotic plant materials, and adding chemical-neutralizing compounds (e.g., clay compounds) when necessary and appropriate.

The project would include private storm drain facilities and detention basins that would collect runoff and route to water quality and hydromodification program compliant basins prior to discharging it into the existing natural drainage creek adjacent to Pomerado Road. There would be no adverse drainage effects due to project development, as the estimated peak flows would effectively be the same when comparing total pre/post construction peak flows. Because the proposed drainage patterns would be consistent with the existing conditions, the project would have no adverse impacts on the downstream facilities. Additionally, because the project would not result in a change in peak flows or drainage patterns, there would be no impact to the MHPA. The project would include water quality measures identified in applicable water quality control programs. The project has been designed to limit post-development storm water runoff discharge rates and velocities to maintain or reduce pre-development erosion and to reduce nutrients, organic compounds, oxygen demanding substances, oil and grease, bacteria and viruses, and pesticides by applying BMPs.

2. Toxics

Land uses, such as recreation and agriculture, that use chemicals or generate by-products such as manure, that are potentially toxic or impactive to wildlife, sensitive species, habitat, or water quality need to incorporate measures to reduce impacts caused by application and/or drainage or such materials into the MHPA.

The project would incorporate measures to reduce impacts caused by the application and/or drainage of chemicals or generate byproducts such as pesticides, herbicides, and animal waste, and other substances that are potentially toxic or impactive to native habitats/flora/fauna (including water) into the MHPA. Construction BMPs, such as silt fencing and straw wattle, would be used, therefore ensuring that toxins from construction would not impact the MHPA. The project has been designed to limit post-development storm water runoff discharge rates and velocities to maintain or reduce pre-development erosion and to reduce nutrients, organic compounds, oxygen demanding substances, oil and grease, bacteria and viruses, and pesticides by applying BMPs.

3. Lighting

Lighting of all developed areas within and adjacent to the MHPA should be directed away from the MHPA. When necessary, development should provide adequate shielding with non-invasive plant materials (preferably native), berming, and/or other methods to protect the MHPA and sensitive species from night lighting.

Project lighting would include low-level lights directed away and/or shielded from native habitat or shielded to minimize light pollution.

4. Noise

Uses within or adjacent to the MHPA should be designed to minimize noise impacts. Berms or walls should be constructed adjacent to commercial areas, recreational areas, and any other use that may introduce noises that could impact or interfere with wildlife use of the MHPA. Excessively noisy uses or activities adjacent to breeding areas must incorporate noise reduction measures and be curtailed during the breeding season of sensitive species. Adequate noise reduction measures should also be incorporated for the remainder of the year.

Construction noise occurring during the breeding season of coastal California gnatcatcher has the potential to result in significant indirect noise impacts to sensitive species. The project site lacks suitable habitat to support least Bell's vireo and southwestern willow flycatcher. However, there is suitable coastal sage scrub habitat within the MHPA in the northern portion of the site to support coastal California gnatcatcher. Protocol surveys would be conducted to determine the presence or absence of this sensitive bird species if construction occurs within its breeding season noted above. If present, appropriate noise measures would be evoked The MHPA is at a lower elevation than the entire project site; therefore, it is not anticipated that the MHPA would be impacted by excessive noise.

5. Invasives

No invasive plant species shall be introduced into areas within the MHPA.

The Conceptual Landscape Plan incorporates a planting palette for the project that does not include any invasive or non-native plant species adjacent to the MHPA area. The plan addresses special treatment with landscaping that reflects the native habitat present in the adjacent natural open space. Additionally, barriers would be constructed in the yards of those units adjacent to the MHPA to separate the landscaping from the open space area. Slopes that occur adjacent to areas of existing undisturbed vegetation would be planted with native plant species compatible with existing vegetation.

6. Brush Management

All BMZ 1 areas must be included within the developmental footprint and outside the MHPA. BMZ 2 is allowed within the MHPA (considered impact neutral), but cannot be used as mitigation.

The brush management plan for the project would encompass 7.3 acres (see Figure 3-3). All BMZ 1 and BMZ 2 areas would be located outside the MHPA. All areas within the limits of disturbance would be revegetated with a native hydroseed mix. BMZ 2 would be maintained on a regular basis by pruning and thinning plants and controlling weeds.

7. Access to MHPA

If any access is required to the MHPA, it should be directed to minimize impacts and reduce impacts associated with domestic pet predation.

The project would not provide access to the MHPA. A fence would be installed around the perimeter of the site that would prohibit any pedestrians from entering into any MHPA native areas. Additionally, the project would maintain a 2:1 to 1.5:1 native vegetated slope adjacent to the MHPA boundary. This vegetated slope would also function as a deterrent to pedestrian access into the MHPA. The passive open space corridor along Pomerado Road and Carroll Canyon Creek would be preserved in its existing condition.

8. Grading/Land Development

Manufactured slopes associated with site development shall be included within the development footprint for projects within or adjacent to the MHPA.

The proposed manufactured slopes for the project would be within the development footprint and would not encroach into the MHPA. Native plants would be installed on manufactured slopes created by the project and in described brush management above.

4.1.5.2 Significance of Impacts

The approved MHPA boundary line adjustment would be beneficial to the overall MHPA preserve at this location due to an increase in Tier II habitat, jurisdictional habitats, and acreage of preserved land. Indirect impacts to the adjacent MHPA from project construction and operation could be potentially significant. To preclude such impacts, the project would incorporate design features consistent with the City's MHPA Land Use Adjacency Guidelines. In order to assist City staff in determining that these impact-avoiding design features have been included in the project's final plans, verification by a qualified biologist would be required. This verification has been included in the mitigation measure stated below.

As discussed in Section 4.3, Biological Resources, coastal California gnatcatcher, and raptors were determined to have the potential to occur on-site due to the existence of suitable habitat. Indirect impacts to the coastal California gnatcatcher, and raptors and other birds resulting from construction noise would be significant.

4.1.5.3 Mitigation, Monitoring, and Reporting

LAND-1:

a. Protection during Construction

I. Prior to Construction

A. **Biologist Verification** — The owner/permittee shall provide a letter to the City's Mitigation Monitoring Coordination (MMC) section stating that a Project Biologist (Qualified Biologist) as defined in the City's Biological Guidelines (2012), has been retained to implement the project's biological monitoring program. The letter shall include the names and contact information of all persons involved in the biological monitoring of the project.

B. **Preconstruction Meeting** — The Qualified Biologist shall attend the preconstruction meeting, discuss the project's biological monitoring program, and arrange to perform any follow up mitigation measures and reporting including site-specific monitoring, restoration or revegetation, and additional fauna/flora surveys/salvage.

C. **Biological Documents** — The Qualified Biologist shall submit all required documentation to MMC verifying that any special mitigation reports including, but not limited to, maps, plans, surveys, survey timelines, or buffers are completed or scheduled per City Biology Guidelines, MSCP, ESL, project permit conditions; CEQA; endangered species acts; and/or other local, state or federal requirements.

D. **BCME** — The Qualified Biologist shall present a Biological Construction Mitigation/Monitoring Exhibit (BCME) which includes the biological documents in C above. In addition, include: restoration/revegetation plans, plant salvage/relocation requirements (e.g., coastal cactus wren plant salvage, burrowing owl exclusions, etc.), avian or other wildlife surveys/survey schedules (including general avian nesting and U.S. Fish and Wildlife Service [USFWS] protocol), timing of surveys, wetland buffers, avian construction avoidance areas/noise buffers/ barriers, other impact avoidance areas, and any subsequent requirements determined by the Qualified Biologist and the City Assistant Deputy Director (ADD)/MMC. The BCME shall include a site plan, a written and graphic depiction of the project's biological mitigation/monitoring program, and a schedule. The BCME shall be approved by MMC and referenced in the construction documents.

E. **Avian Protection Requirements** — To avoid any direct impacts to raptors and/or any native/migratory birds, removal of habitat that supports active nests in the proposed area of disturbance should occur outside of the breeding season for these species (February 1 to September 15). If removal of habitat in the proposed area of disturbance must occur during the breeding season, the Qualified Biologist shall conduct a pre-construction survey to determine the presence or absence of nesting birds on the proposed area of disturbance. The pre-construction survey shall be conducted within 10 calendar days prior to the start of construction activities (including removal of vegetation). The applicant shall submit the results of the pre-construction survey to City Development Services Department (DSD) for review and approval prior to initiating any construction activities. If nesting birds are detected, a letter report or mitigation plan in conformance with the City's Biology Guidelines and applicable state and federal law (i.e., appropriate follow up surveys, monitoring schedules, construction and noise barriers/buffers, etc.) shall be prepared and include proposed measures to be implemented to ensure that take of birds or eggs or disturbance of breeding activities is avoided. The report or mitigation plan shall be submitted to the City for review and approval and implemented to the satisfaction of the City. The City's MMC or Resident Engineer (RE) and Biologist shall verify and approve that all measures identified in the report or mitigation plan are in place prior to and/or during construction.

F. **Resource Delineation** — Prior to construction activities, the Qualified Biologist shall supervise the placement of orange construction fencing or equivalent along the limits of disturbance adjacent to sensitive biological habitats and verify compliance with any other project conditions as shown on the BCME. This phase shall include flagging plant specimens and delimiting buffers to protect sensitive biological resources (e.g., habitats/flora and fauna species, including nesting birds) during construction. Appropriate steps/care should be taken to minimize attraction of nest predators to the site.

G. **Education** — Prior to commencement of construction activities, the Qualified Biologist shall meet with the owner/permittee or designee and the construction crew and conduct an on-site educational session regarding the need to avoid impacts outside of the approved construction area and to protect sensitive flora and fauna (e.g., explain the avian and wetland buffers, flag system for removal of invasive species or retention of sensitive plants, and clarify acceptable access routes/methods and staging areas, etc.).

II. During Construction

A. **Monitoring** — All construction (including access/staging areas) shall be restricted to areas previously identified, proposed for development/staging, or previously disturbed as shown on "Exhibit A" and/or the BCME. The Qualified Biologist shall monitor construction activities as needed to ensure that construction activities do not encroach into biologically sensitive areas or cause other similar damage, and that the work plan has been amended to accommodate any sensitive species located during the pre-

construction surveys. In addition, the Qualified Biologist shall document field activity via the Consultant Site Visit Record (CSVR). The CSVR shall be e-mailed to MMC on the first day of monitoring, the first week of each month, the last day of monitoring, and immediately in the case of any undocumented condition or discovery.

B. **Subsequent Resource Identification** — The Qualified Biologist shall note/act to prevent any new disturbances to habitat, flora, and/or fauna on-site (e.g., flag plant specimens for avoidance during access, etc.). If active nests or other previously unknown sensitive resources are detected, all project activities that directly impact the resource shall be delayed until species-specific local, state, or federal regulations have been determined and applied by the Qualified Biologist.

III. Post Construction Measures

A. In the event that impacts exceed previously allowed amounts, additional impacts shall be mitigated in accordance with City Biology Guidelines, ESL and MSCP, CEQA, and other applicable local, state, and federal law. The Qualified Biologist shall submit a final BCME/report to the satisfaction of the City ADD/MMC within 30 days of construction completion.

b. MHPA Adjacency

LAND-2: Prior to issuance of any construction permit or notice to proceed, DSD, and/or MSCP staff shall verify the Applicant has accurately represented the project's design in or on the Construction Documents (CDs; CDs consist of Construction Plan Sets for Private Projects and Contract Specifications for Public Projects) are in conformance with the associated discretionary permit conditions and Exhibit "A", and also the City's MSCP MHPA Land Use Adjacency Guidelines. The applicant shall provide an implementing plan and include references on/in CDs of the following:

A. **Grading/Land Development/MHPA Boundaries** — MHPA boundaries on-site and adjacent properties shall be delineated on the CDs. DSD planning and/or MSCP staff shall ensure that all grading is included within the development footprint, specifically manufactured slopes, disturbance, and development within or adjacent to the MHPA. For projects within or adjacent to the MHPA, all manufactured slopes associated with site development shall be included within the development footprint.

B. **Drainage** — All new and proposed parking lots and developed areas in and adjacent to the MHPA shall be designed so they do not drain directly into the MHPA. All developed and paved areas must prevent the release of toxins, chemicals, petroleum products, and exotic plant materials prior to release by incorporating the use of filtration devices, planted swales and/or planted detention/desiltation basins, or other approved permanent methods that are designed to minimize negative impacts, such as excessive water and toxins into the ecosystems of the MHPA.

C. **Toxics/Project Staging Areas/Equipment Storage** — Projects that use chemicals or generate byproducts such as pesticides, herbicides, and animal waste, and other substances that are potentially toxic or impactive to native habitats/flora/fauna (including water) shall incorporate measures to reduce impacts caused by the application and/or drainage of such materials into the MHPA. No trash, oil, parking, or other construction/development-related material/activities shall be allowed outside any approved construction limits. Where applicable, this requirement shall be incorporated into leases on publicly owned property when applications for renewal occur. Provide a note in/on the CDs that states: "All construction-related activity that may have potential for leakage or intrusion shall be monitored by the Qualified Biologist/Owners Representative or Resident Engineer to ensure there is no impact to the MHPA."

D. **Lighting** — Lighting within or adjacent to the MHPA shall be directed away/shielded from the MHPA and be subject to City Outdoor Lighting Regulations per LDC Section 142.0740.

E. **Barriers** — New development within or adjacent to the MHPA shall be required to provide barriers (e.g., non-invasive vegetation; rocks/boulders; 6-foot high, vinyl-coated, chain-link or equivalent fences/walls; and/or signage) along the MHPA boundaries to direct public access to appropriate locations, reduce domestic animal predation, protect wildlife in the preserve, and provide adequate noise reduction where needed.

F. **Invasives** — No invasive non-native plant species shall be introduced into areas within or adjacent to the MHPA.

G. **Brush Management** — New development adjacent to the MHPA shall be set back from the MHPA to provide required BMZ 1 area on the building pad outside of the MHPA. BMZ 2 may be located within the MHPA provided the BMZ 2 management will be the responsibility of a private entity except where narrow wildlife corridors require it to be located outside of the MHPA. Brush management zones shall not be greater in size than currently required by the City's regulations, the amount of woody vegetation clearing shall not exceed 50 percent of the vegetation existing when the initial clearing is done, and vegetation clearing shall be prohibited within native coastal sage scrub and chaparral habitats from March 1–August 15 except where the City ADD/MMC has documented the thinning would be consist with the City's MSCP Subarea Plan. Existing and approved projects are subject to current requirements of Municipal Code Section 142.0412.

H. **Noise** — Due to the site's location adjacent to or within the MHPA where the Qualified Biologist has identified potential nesting habitat for listed avian species, construction noise that exceeds the maximum levels allowed shall be avoided during the breeding seasons for the following: coastal California gnatcatcher (March 1–August 15). If construction is proposed during the breeding season for the species, USFWS protocol surveys shall be required in order to determine species presence/absence. If protocol

surveys are not conducted in suitable habitat during the breeding season for the aforementioned listed species, presence shall be assumed with implementation of noise attenuation and biological monitoring.

When applicable (i.e., habitat is occupied or if presence of the covered species is assumed), adequate noise reduction measures shall be incorporated as follows:

COASTAL CALIFORNIA GNATCATCHER (Federally Threatened)

Prior to the issuance of any grading permit, the City Manager (or appointed designee) shall verify that the MHPA boundaries and the following project requirements regarding the coastal California gnatcatcher are shown on the construction plans:

No clearing, grubbing, grading, or other construction activities shall occur between March 1 and August 15, the breeding season of the coastal California gnatcatcher, until the following requirements have been met to the satisfaction of the City Manager:

a. A Qualified Biologist (possessing a valid Endangered Species Act Section 10(a)(1)(a) Recovery Permit) shall survey those habitat areas within the MHPA that would be subject to construction noise levels exceeding 60 A-weighted decibels [dB(A)] hourly average for the presence of the coastal California gnatcatcher. Surveys for the coastal California gnatcatcher shall be conducted pursuant to the protocol survey guidelines established by the USFWS within the breeding season prior to the commencement of any construction. If coastal California gnatcatchers are present, then the following conditions must be met:

    i. Between March 1 and August 15, no clearing, grubbing, or grading of occupied coastal California gnatcatcher habitat shall be permitted. Areas restricted from such activities shall be staked or fenced under the supervision of a Qualified Biologist; and

    ii. Between March 1 and August 15, no construction activities shall occur within any portion of the site where construction activities would result in noise levels exceeding 60 dB(A) hourly average at the edge of occupied gnatcatcher habitat. An analysis showing that noise generated by construction activities would not exceed 60 dB(A) hourly average at the edge of occupied habitat must be completed by a Qualified Acoustician (possessing current noise engineer license or registration with monitoring noise level experience with listed animal species) and approved by the City Manager at least two weeks prior to the commencement of construction activities. Prior to the commencement of construction activities during the breeding season, areas restricted from such activities shall be staked or fenced under the supervision of a Qualified Biologist; or

iii. At least two weeks prior to the commencement of construction activities, under the direction of a qualified acoustician, noise attenuation measures (e.g., berms, walls) shall be implemented to ensure that noise levels resulting from construction activities will not exceed 60 dB(A) hourly average at the edge of habitat occupied by the coastal California gnatcatcher. Concurrent with the commencement of construction activities and the construction of necessary noise attenuation facilities, noise monitoring* shall be conducted at the edge of the occupied habitat area to ensure that noise levels do not exceed 60 dB(A) hourly average. If the noise attenuation techniques implemented are determined to be inadequate by the Qualified Acoustician or biologist, then the associated construction activities shall cease until such time that adequate noise attenuation is achieved or until the end of the breeding season (August 16).

* Construction noise monitoring shall continue to be monitored at least twice weekly on varying days, or more frequently depending on the construction activity, to verify that noise levels at the edge of occupied habitat are maintained below 60 dB(A) hourly average or to the ambient noise level if it already exceeds 60 dB(A) hourly average. If not, other measures shall be implemented in consultation with the biologist and the City Manager, as necessary, to reduce noise levels to below 60 dB(A) hourly average or to the ambient noise level if it already exceeds 60 dB(A) hourly average. Such measures may include, but are not limited to, limitations on the placement of construction equipment and the simultaneous use of equipment.

b. If coastal California gnatcatchers are not detected during the protocol survey, the Qualified Biologist shall submit substantial evidence to the City Manager and applicable resource agencies which demonstrates whether or not mitigation measures such as noise walls are necessary between March 1 and August 15, as follows:

i. If this evidence indicates the potential is high for coastal California gnatcatcher to be present based on historical records or site conditions, then condition a.iii shall be adhered to as specified above.

ii. If this evidence concludes that no impacts to this species are anticipated, no mitigation measures would be necessary.

4.1.5.4 Significance after Mitigation

Implementation of the mitigation measures listed above would reduce potentially significant impacts associated with the adjacent MHPA to below a level of significance.

4.1.6 Issue 4: MCAS Miramar ALUCP Compatibility

Would the project result in land uses which are not compatible with an adopted ALUCP?

4.1.6.1 Impacts

As described under the existing conditions, the project site is located within MCAS Miramar AIA Review Area 2. Pursuant to the MCAS Miramar ALUCP, only the following actions affecting land use require Airport Land Use Commission review: any object which has received a final notice of determination from the FAA that the project will constitute a hazard or obstruction to air navigation; any proposed object in a High Terrain Zone having a height of greater than 35 feet above ground level; any project having the potential to create electrical or visual hazards to aircraft in flight; and/or any project having the potential to cause an increase in the attraction of birds or other wildlife that can be hazardous to aircraft operations in the vicinity of the airport (MCAS Miramar ALUCP 2008). The project does not propose any of the aforementioned features within the Review Area 2. As such, the project is consistent with the ALUCPs. The project was reviewed by the FAA against obstruction evaluation criteria contained in the Federal Code of Regulations, Title 14, FAA Part 77 (Obstruction Evaluation/Airport Airspace Analysis). The Airport Land Use Compatibility Overlay Zone requires that proposed community plan amendments and rezones be submitted to the Airport Land Use Commission for a consistency determination with the ALUCP. The Airport Land Use Commission determined that the project would be consistent with the ALUCP (Aeronautical Study No. 2011-AWP-6945-OE, Issued Date: July 10, 2013). Thus, airport compatibility impacts would be less than significant.

4.1.6.2 Significance of Impacts

The project would be compatible with the MCAS Miramar ALUCP. Impacts would be less than significant.

4.1.6.3 Mitigation, Monitoring, and Reporting

Impacts would be less than significant. No mitigation is required.

4.1.7 Issue 5: General Plan Noise/Land Use Compatibility

Would the project result in the exposure of people to noise levels which are incompatible with the Noise Compatibility Guidelines (Table NE-3) in the Noise Element of the General Plan?

4.1.7.1 Impacts

Exterior noise impacts to projects are evaluated in relation to consistency with General Plan land use noise compatibility guidelines. The City's exterior noise level compatibility standard for senior living use is 65 CNEL. Noise-sensitive residential interior spaces have an interior standard of 45 CNEL. The noise section of the City's Significance Determination Thresholds for CEQA (2011) indicates that for convalescent homes, exterior noise levels would be considered

significant if future projected traffic would result in noise levels exceeding 65 CNEL at exterior usable areas or interior noise levels exceeding 45 CNEL.

On-site sensitive receptors of the project would be exposed to traffic noise from Pomerado Road. Noise generated by future traffic was modeled using the Federal Highway Administration Traffic Noise Model (TNM) Version 2.5. The TNM program calculates noise levels at selected receiver locations using input parameter estimates such as projected hourly average traffic rates; vehicle mix, distribution, and speed; roadway lengths and gradients; distances between sources, barriers, and receivers; and shielding provided by intervening terrain, barriers, and structures. Existing and future (Year 2030) traffic volumes on Pomerado Road were obtained from the Traffic Impact Analysis (TIA) prepared for the project (Appendix D). Table 4.1-2 summarizes the future traffic parameters used in this analysis.

TABLE 4.1-2
EXISTING AND YEAR 2030 ROADWAY TRAFFIC PARAMETERS

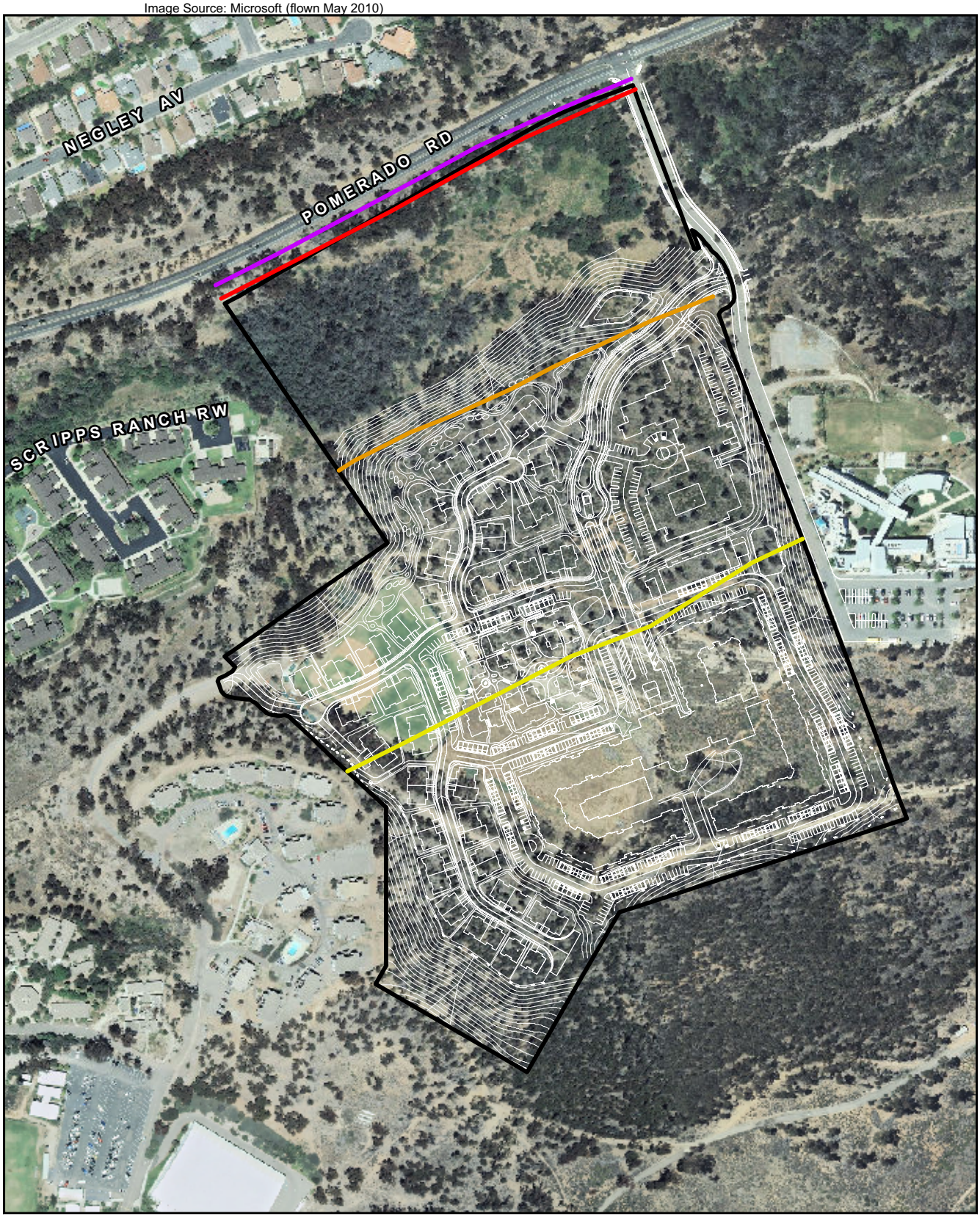
Roadway	Existing Volume (ADT)	2030 Volume (ADT)	Traffic Mix[1] (Percent)					Speed (mph)
			Cars	Motor-cycles	Buses	Medium Trucks	Heavy Trucks	
Pomerado Road	22,199	29,504	97.9	0.9	0.3	0.6	0.3	45

[1]Traffic mix is based on field traffic counts.

Noise levels were modeled for a series of ground-floor receivers located throughout the project site to determine the future noise contours due to traffic on Pomerado Road. The resulting noise contours at five feet above the ground are shown in Figure 4.1-4. These noise contours take into account topography and proposed grading elevations, but do not take into account any shielding provided by the proposed buildings. “Pavement” ground conditions were used in modeling noise levels at these receivers to account for a worst-case site condition. As discussed previously, the Carroll Canyon open space

would be preserved with existing vegetation. This would result in noise levels less than those calculated for a “pavement” ground condition.

Image Source: Microsoft (flown May 2010)



Project Boundary

Future Noise Contours

- 55 CNEL
- 60 CNEL
- 65 CNEL
- 70 CNEL

0 Feet 350

FIGURE 4.1-4

Future Vehicle Traffic Noise Contours

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As seen in Figure 4.1-4, noise levels are projected to be less than the General Plan standard of 65 CNEL across the entire project site. The exterior use areas would be located at the villa units, the courtyard at the center of the garden terrace building, at the center of the commons building and independent living units building, the tennis court, bocce ball courts, croquet lawn, pool, rose garden, and other areas dedicated to outdoor use and recreation. Noise levels at these exterior use areas are projected to be less than 65 CNEL, and would be less than significant.

Noise levels were also modeled for a series of 55 receivers at each of the proposed buildings at first through fourth floor locations to determine whether interior noise levels may exceed standards. Receiver locations are shown in Figure 4.1-5. Noise levels at these locations include the effects of future grading on the property, but do not include any shielding provided by proposed buildings.

Table 4.1-3 indicates the projected future noise levels at the 55 modeled receivers. As seen from this table, exterior noise levels at all proposed buildings are projected to be less than 60 CNEL. As noted above, modeled noise levels do not account for building shielding. Thus, the noise levels shown in Table 4.1-3 are conservative, and actual noise levels would be quieter than what is shown. Thus, exterior noise levels would be compatible with the General Plan land use noise standards.

Image Source: Microsoft (flown May 2010)

0 Feet 300

Project Boundary

Modeled Receiver

FIGURE 4.1-5

Modeled Receiver Locations

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TABLE 4.1-3
FUTURE MODELED NOISE LEVELS

Receiver	Building/Unit	Modeled Noise Level (CNEL)			
		First-Floor	Second-Floor	Third-Floor	Fourth-Floor
1	Villa Units	59	--	--	--
2	Villa Units	59	--	--	--
3	Villa Units	59	--	--	--
4	Villa Units	58	--	--	--
5	Villa Units	58	--	--	--
6	Villa Units	57	--	--	--
7	Villa Units	57	--	--	--
8	Villa Units	56	--	--	--
9	Villa Units	56	--	--	--
10	Villa Units	56	--	--	--
11	Villa Units	58	--	--	--
12	Villa Units	58	--	--	--
13	Villa Units	58	--	--	--
14	Villa Units	57	--	--	--
15	Villa Units	57	--	--	--
16	Villa Units	57	--	--	--
17	Villa Units	57	--	--	--
18	Villa Units	56	--	--	--
19	Villa Units	56	--	--	--
20	Villa Units	55	--	--	--
21	Villa Units	55	--	--	--
22	Villa Units	54	--	--	--
23	Villa Units	54	--	--	--
24	Villa Units	53	--	--	--
25	Villa Units	53	--	--	--
26	Villa Units	52	--	--	--
27	Villa Units	52	--	--	--
28	Villa Units	52	--	--	--
29	Villa Units	53	--	--	--
30	Villa Units	53	--	--	--
31	Villa Units	54	--	--	--
32	Villa Units	54	--	--	--
33	Garden Terrace Units	55	54	--	--
34	Garden Terrace Units	56	55	--	--
35	Garden Terrace Units	56	55	--	--
36	Garden Terrace Units	55	55	--	--
37	Garden Terrace Units	55	54	--	--
38	Garden Terrace Units	55	54	--	--
39	Health Center	58	58	--	--
40	Health Center	56	56	--	--
41	Facilities Building	55	55	--	--
42	Facilities Building	55	55	--	--
43	Independent Living Units	54	54	53	53
44	Independent Living Units	55	54	54	54
45	Independent Living Units	54	54	54	54
46	Independent Living Units	54	53	53	53
47	Independent Living Units	53	52	52	52
48	Independent Living Units	52	52	52	52
49	Independent Living Units	52	52	52	52
50	Independent Living Units	53	52	52	52
51	Independent Living Units	53	52	52	52
52	Independent Living Units	54	53	53	53
53	Independent Living Units	54	53	53	53
54	Commons Building	54	53	53	53
55	Commons Building	53	53	53	53

NOTE: Villa units are one-story; garden terrace units, health center, and facilities buildings are two stories; and independent living units and commons building are up to four stories.

Interior noise levels for dwellings other than detached single-family dwellings are regulated by Title 24 of the CCR, California Noise Insulation Standards. Title 24, Chapter 12, Section 1207, of the California Building Code requires that interior noise levels attributable to exterior sources not exceed 45 CNEL in any habitable room within a residential structure. Standard construction techniques would provide a 15 dB reduction of exterior noise levels to an interior receiver. With these criteria, standard construction is projected to result in interior noise levels of 45 CNEL or less when exterior sources are 60 CNEL or less. Acoustical studies must be prepared for proposed residential structures located where the noise level exceeds 60 CNEL. Because exterior noise levels would not exceed 60 CNEL at the proposed buildings (see Table 4.1-3), interior noise levels would not exceed 45 CNEL, and interior noise impacts would be less than significant.

4.1.7.2 Significance of Impacts

Exterior noise levels at all proposed buildings are projected to be less than 60 CNEL. Thus, exterior noise levels would be compatible with the General Plan land use noise standards. Residential uses have an interior standard of 45 CNEL. Because exterior noise levels would not exceed 60 CNEL at the proposed buildings (see Table 4.1-3), it can be concluded that interior noise levels would not exceed 45 CNEL, and interior noise impacts would be less than significant.

4.1.7.3 Mitigation, Monitoring, and Reporting

Impacts would be less than significant. No mitigation is required.

4.1.8 Issue 6: Aircraft Noise Compatibility

Would the project result in land uses which are not compatible with aircraft noise levels as defined by an adopted ALUCP?

4.1.8.1 Impacts

As discussed above, the MCAS Miramar runways are approximately 2.5 miles southwest of the project site. The project lies approximately half a mile north of the 60 CNEL contour (Figure 4.1-6). Therefore, aircraft operations would not result in significant noise or vibration impacts to the project.

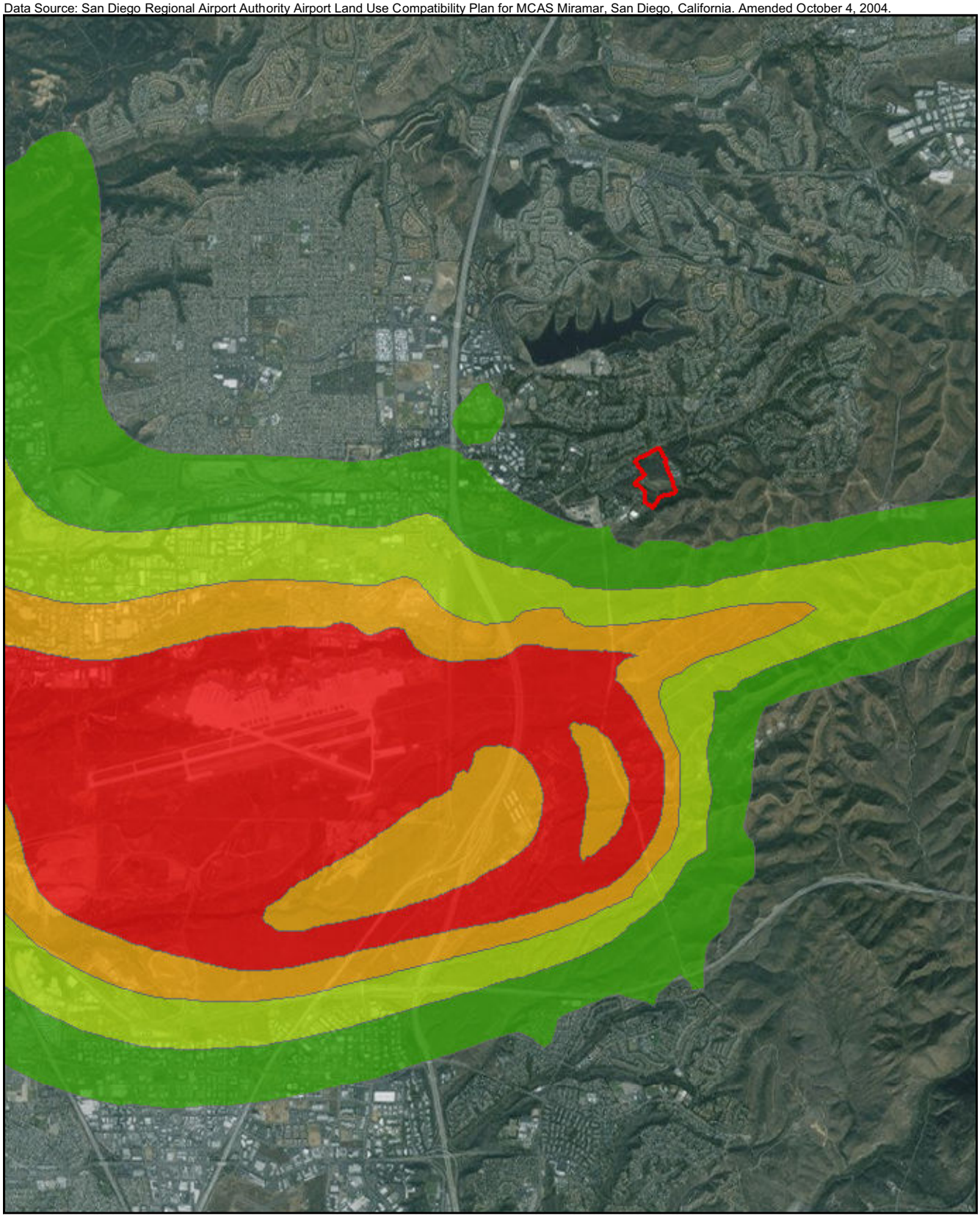
4.1.8.2 Significance of Impacts

The project site is outside the 60 CNEL contour of MCAS Miramar. Impacts would be less than significant.

4.1.8.3 Mitigation, Monitoring, and Reporting

Impacts would be less than significant. No mitigation is required.

Image Source: Microsoft (flown May 2010),
Data Source: San Diego Regional Airport Authority Airport Land Use Compatibility Plan for MCAS Miramar, San Diego, California. Amended October 4, 2004.



Project Boundary

MCAS Miramar Noise Contours

60 CNEL
65 CNEL
70 CNEL
75 CNEL

0 Miles 1

RECON

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FIGURE 4.1-6

MCAS Miramar Noise Contours

TABLE 4.1-1
SUMMARY OF PROJECT CONSISTENCY WITH APPLICABLE LAND USE PLANS GOALS AND OBJECTIVES

Objectives	Consistency Evaluation
SCRIPPS MIRAMAR RANCH COMMUNITY PLAN	
Overall Community Goals a. Preserve and enhance the valued natural resources of the Scripps Miramar Ranch community: hills, trees, water resources, Miramar Reservoir, Carroll Canyon and subsidiary canyons; maximize public benefit through public ownership and/or access, both visual and physical, to these resources.	The project would maintain the public's use, visual and physical, of Carroll Canyon. The passive open space corridor along Pomerado Road and Carroll Canyon Creek would be preserved in its existing condition. Existing and proposed landscaping and topography would screen buildings from view. The project would result in minor alterations to the existing visual characteristics of the site from vantage points on Pomerado Road. Due to topography and intervening vegetation, the project would not be highly visible from Pomerado Road or other public locations. The open space located south of Pomerado Road and north of the project's grading footprint would be preserved. With the proposed MHPA boundary line adjustment, 1.87 acres would be removed from the MHPA and 7.46 acres of land would be preserved as MSCP land via a Covenant of Easement. As a result of this on-site land exchange, the MHPA land on-site would total 9.90 acres. The proposed MHPA boundary line adjustment would be beneficial to the overall MHPA preserve at this location due to an increase in Tier II habitat and acreage of preserved land. This would include the preservation and dedication of 5.49 acres of eucalyptus woodland.
b. Provide a harmonious physical environment within the community by maximizing preservation of existing stands of trees and foresting appropriate open space areas as development occurs.	An existing stand of trees in the southwest portion of the project site would be removed for the proposed development; however, a Covenant of Easement would preserve 5.49 acres of eucalyptus in the MHPA area.
c. Maintain and enhance usable open space networks throughout the community by providing continuous open space systems which link such community elements as parks, schools, residential, commercial and industrial areas.	Because the open space located south of Pomerado Road and north of the project's grading footprint would be preserved, the passive open space corridor along Pomerado Road and Carroll Canyon Creek would be preserved in its existing condition.
d. Encourage development of open space buffers, which will effectively screen disparate elements of the community.	The grading would blend into the natural topography, the Carroll Canyon open space would be preserved, and existing and proposed landscaping and topography would screen buildings from view. The project would result in minor alterations to the existing visual characteristics associated with the site from vantage points on Pomerado Road. Due to topography and intervening vegetation, the project would not be highly visible from Pomerado Road or other public locations. See Section 4.7 for photo simulations and a discussion of visual impacts.

TABLE 4.1-1
SUMMARY OF PROJECT CONSISTENCY WITH APPLICABLE LAND USE PLANS GOALS AND OBJECTIVES
(continued)

Objectives	Consistency Evaluation
e. Maintain and enhance the rural-residential characteristics of the existing Scripps Miramar Ranch, while promoting a variety of housing opportunities throughout the community.	The project would provide diversity in housing by constructing a continuing care retirement center in a community that otherwise lacks this type of housing. The overall design theme for the project would be an old ranch design with old stone walls, boulders, and tree groves. Through design elements, the project would enhance community character while providing a diversity of visual landscape.
f. Provide for educational opportunities and facilities and park and recreation services concurrent with need.	The project site is owned by Alliant International University and is permitted by CUP 133-PC. The SMRCP encourages interaction between the university and the community. The uses permitted by CUP 133-PC include an auditorium; academic facilities consisting of classrooms, lecture halls faculty offices, and student study areas; a physical education gymnasium and play field; residence halls; an amphitheater; and permanent and temporary parking. However, Alliant International University does not have plans to construct these facilities, and except for the baseball field, the project site remains vacant and unused. Development of the site as permitted under CUP 133-PC has been considered as a project alternative and is discussed in Section 9.0. When compared to the project, this alternative would result in greater environmental impacts. This alternative would generate approximately five times more traffic than the project. Additionally, the project would not interfere with interaction between Alliant International University and Marshall Middle School, local elementary schools, or the community. Because Alliant International University does not have plans to construct additional facilities on the project site and because the project would not impact the university's interaction with the community, the project would not conflict with the SMRCP educational goals.
g. Encourage quality educational and cultural opportunities through greater community interaction with local institutions.	See Overall Community Goal (f) above. The project would not impact Alliant International University's interaction with local schools and the community.

TABLE 4.1-1
SUMMARY OF PROJECT CONSISTENCY WITH APPLICABLE LAND USE PLANS GOALS AND OBJECTIVES
(continued)

Objectives	Consistency Evaluation
h. Provide an efficient transportation system for vehicular, bicycle, equestrian and pedestrian traffic within the community, with multiple access routes to the greater metropolitan area.	The regional transportation network in the project area consists of I-15 to the west and State Route 52 to the south. Pomerado Road fronts the northern border of the project site and provides primary local access to the project area as well as a regional east–west travel way through the Scripps Miramar Ranch Community. Access to the project site would be provided by Chabad Center Driveway from Pomerado Road. The project would not result in a significant impact to area freeways. However, the project would result in significant direct and cumulative impacts to Pomerado Road as a result of the increase in traffic. Since Pomerado Road would not be widened to four lanes (see Section 4.2), direct and cumulative traffic impacts would remain significant and unmitigated. This would also result in a conflict with this SMRCP goal, and would therefore result in a significant land use impact. The project would provide an internal pedestrian system and pedestrian linkages to Pomerado Road. The project would not interfere with the corridor along Pomerado Road that allows for pedestrian, bicycle, and equestrian use adjacent Carroll Canyon Creek
i. Guarantee that the financial costs of further development in the planning area shall not be borne by residents of the Scripps Ranch community existing prior to the adoption of this Plan.	The project applicant would provide all necessary infrastructure and utilities to the project site. The project would not result in financial costs to the SMRCP area residents. The City of San Diego collects impact fees from new development to assist in funding community-wide public services, utilities, and facilities, and as a means to offset new development's impact on infrastructure and public services. Facilities Benefit Assessments (FBA) generally provide funds for public facilities projects which service a designated area of benefit and are identified in the Public Facilities Financing Plan (PFFP). The FBA fees are based upon the cost of each public facility equitably distributed over a designated area of benefit in the community planning area. Fees are paid on the actual development when permits are issued. The project would comply with all City of San Diego policies regarding the payment of FBA fees to ensure that the development would not significantly impact existing and future utilities.

TABLE 4.1-1
SUMMARY OF PROJECT CONSISTENCY WITH APPLICABLE LAND USE PLANS GOALS AND OBJECTIVES
(continued)

Objectives	Consistency Evaluation
j. Guarantee that existing public facilities (roads, parks, schools, open space, recreational facilities) shall not be adversely impacted by added population resulting from development in the planning area.	As discussed under Overall Community Goals (a) through (g) and (i), the project would not adversely impact parks, schools, open space, or recreational facilities. However, the project would result in significant direct and cumulative impacts to Pomerado Road as a result of the increase in traffic. Since Pomerado Road would not be widened to four lanes (see Section 4.2), direct and cumulative traffic impacts would remain significant and unmitigated. This would conflict with this SMRCP goal and would result in a significant land use impact.
k. Enhance the overall quality of the Scripps Ranch community so that the existing community benefits from, and is not degraded by, further development in the planning area.	See Overall Community Goal (j). The project would preserve and enhance open space south of Pomerado Road. However, the increase in traffic on Pomerado Road would conflict with this SMRCP goal and would result in a significant land use impact.
l. Preserve the existing sense of neighborhood identity, which unifies residents and promotes social interaction and civic cooperation.	The project would provide a range of on-site amenities for its residents including a Commons Building consisting of learning centers, a lecture hall, a library, an auditorium, fine dining, fine arts facilities, a tennis court, gardens, a fitness center, and a pool. The project has been designed for walking and would include outdoor gathering places. Therefore, the project would promote a sense of neighborhood identity and social interaction on-site. The project would also be consistent with the overall neighborhood character. The project would support its residents' individual needs and provide a sense of community. The project would not interfere with the existing social interaction and civic cooperation of the community.
Residential Objectives a. Promote a variety of housing types and prices throughout the community in support of the citywide concept of balanced housing opportunities.	The project would provide housing for older adults who have previously been living independently, and desire advanced age services, maintenance-free living, and healthcare support.
b. Encourage development design that preserves the topographic relief of the existing terrain and minimizes cut and fill slopes.	Steep Hillside Guidelines design standards have been incorporated into the project design. The proposed landforms would closely imitate the existing on-site landform and the undisturbed, pre-existing surrounding neighborhood landforms.

TABLE 4.1-1
SUMMARY OF PROJECT CONSISTENCY WITH APPLICABLE LAND USE PLANS GOALS AND OBJECTIVES
(continued)

Objectives	Consistency Evaluation
c. Support cluster-type housing and Planned Residential Development (PRDs) that maximize open space.	The project would provide cluster-type housing. One-story Villas would be located at the northern and western portions of the development footprint. Independent Living Units and Garden Terrace Units would be located near the center of the development footprint along with a Commons Building and on-site amenities discussed under Overall Community Goal (l) above. This project design promotes the use of open usable space within the development footprint. Additionally, the project would preserve open space south of Pomerado Road.
d. Integrate open space areas in residential developments to provide continuous open space systems wherever possible.	See Residential Objective (c) above. Additionally, the passive open space corridor along Pomerado Road and Carroll Canyon Creek would be preserved in its existing condition.
e. Create a harmonious community appearance by utilizing a compatible variety of architectural styles, building heights, setbacks and different lot sizes.	Building materials would consist of natural materials with earth-tone colors and would be consistent with neighborhood character. The internal pedestrian system and pedestrian linkages proposed for the project would provide connectivity and continuity and landscaping would consist of an old ranch design with stone walls, boulders, and tree groves that would complement the existing character of the project site. The height of the proposed buildings would not result in a substantial view blockage from Pomerado Road. The grading footprint would be set back approximately 390 feet south of Pomerado Road and the proposed buildings would be set back by over 650 feet south of Pomerado Road, preserving the existing vegetation and landform of Carroll Canyon and the open space located between Pomerado Road and the proposed buildings. The project would also provide a range of unit sizes (Villas, Independent Living Units, and Garden Terrace Units range from one to three bedrooms) to accommodate a range of needs for its senior residents.
f. Encourage sensitive treatment of areas visible from Carroll Canyon and Miramar Reservoir as a means of reducing the visual impacts of development on these areas; maximize public access, both visual and physical, to these areas.	The project would not significantly impact the public's use, visual or physical, of Carroll Canyon. The passive open space corridor along Pomerado Road and Carroll Canyon Creek would be preserved in its existing condition. Existing and proposed landscaping and topography would screen buildings from view. This corridor allows for pedestrian, bicycle, and equestrian use adjacent Carroll Canyon Creek.
g. Encourage high standards of design, materials and workmanship in construction.	Building materials would consist of natural materials with earth-tone colors and would be consistent with neighborhood character. Landscaping would consist of and old ranch design with stone walls, boulders, and tree groves that would complement the existing character of the project site.

TABLE 4.1-1
SUMMARY OF PROJECT CONSISTENCY WITH APPLICABLE LAND USE PLANS GOALS AND OBJECTIVES
(continued)

Objectives	Consistency Evaluation
h. Provide for effective street planting and landscaping which emphasize use of eucalyptus trees.	The project would preserve 5.49 acres of eucalyptus woodland south of Pomerado Road. A graded slope south of the eucalyptus woodland would be vegetated with a native open space hydroseed mix and would be compatible with the existing mature native vegetation and eucalyptus grove. Existing and proposed landscaping and topography would screen buildings from view. See Section 4.7 for photo simulations and a discussion of visual impacts.
Parks, Recreation, and Open Space Objectives a. Assure continuation of the open space network throughout the planning area to permit walking between various community facilities and areas, including schools, parks, and residential, commercial, industrial and institutional developments.	The internal pedestrian system and pedestrian linkages proposed for the project would provide connectivity and continuity. Pedestrians would also have access to Chabad Center Driveway and Pomerado Road. Trees, landscaping, and gardens would be planted to provide shade and visual interest. The passive open space corridor along Pomerado Road and Carroll Canyon Creek would be maintained in its existing condition and preserved as MSCP land via a Covenant of Easement, assuring continuation of the open space network along Pomerado Road.
b. Guarantee that open space areas are easily accessible to residents and include usable recreation areas which permit such uses as hiking and picnicking.	The passive open space corridor along Pomerado Road and Carroll Canyon Creek would be preserved in its existing condition. The project would not provide access to the MHPA. A fence would be installed around the perimeter of the site that would prohibit any pedestrians from entering into any MHPA native areas. Additionally, the project would maintain a vegetated 2:1 to 1.5:1 slope adjacent to the MHPA boundary. This vegetated slope would also function as a deterrent to pedestrian access into the MHPA. Open space, outdoor useable space, and landscaped areas would be provided within the development footprint. See also Parks, Recreation, and Open Space Objective (d).
c. Provide desirable topographic open space buffers as needed between disparate elements of the community.	The open space located south of Pomerado Road and north of the project's grading footprint would be preserved. This would provide a buffer between Pomerado Road and the project.
d. Require developers to set aside at least 25 percent of the total project area for designation as park and/or open space.	The development footprint of the project is approximately 42 acres of the 53-acre project site. Approximately 21 percent would be preserved as open space. Additionally, within the development footprint, the project includes yards, gardens, a pitch and putt golf course a putting green, landscaped courtyards, a rose garden, bocce ball courts, a croquet lawn, ponds and fountains, and other exterior useable spaces. The preserved open space combined with these proposed park-like amenities would exceed 25 percent of the total project area.

TABLE 4.1-1
SUMMARY OF PROJECT CONSISTENCY WITH APPLICABLE LAND USE PLANS GOALS AND OBJECTIVES
(continued)

Objectives	Consistency Evaluation
e. Maximize preservation of existing mature eucalyptus groves, natural slopes and major canyons through careful siting of roadways and structures.	As discussed under Overall Community Goal (a), the open space located south of Pomerado Road and north of the project's grading footprint would be preserved as MSCP land via a Covenant of Easement. This would include the preservation and dedication of 5.49 acres of existing eucalyptus woodland.
f. Forest open space areas not adjoining Miramar Reservoir at a minimum of 100 eucalyptus trees per acre, thereby expanding the unique and valued eucalyptus environment of this community.	The project would preserve 5.49 acres of existing eucalyptus woodland.
g. Preserve and enhance the valued natural resources of the Scripps Miramar Ranch community: hills, trees, water resources, Miramar Reservoir, Carroll Canyon and subsidiary canyons. Designate the park site located adjacent to the eastern end of the Miramar Reservoir for passive neighborhood park use, and use the 17-acre site south of Pomerado Road in Carroll Canyon, on property adjacent to the United States International University campus and owned by the university, for Resource-Based Park use.	See Overall Community Goal (a). The project would maintain the public's use, visual and physical, of Carroll Canyon. The passive open space corridor along Pomerado Road and Carroll Canyon Creek would be preserved in its existing condition and preserved as MSCP land via a Covenant of Easement.
h. Support preservation of wildlife preserves, historical structures and bodies of water, all of which enhance this community.	See Overall Community Goal (a). After a boundary line adjustment, the total MHPA land on-site would total 9.90 acres. The proposed MHPA boundary line adjustment would be beneficial to the overall MHPA preserve at this location due to an increase in Tier II habitat and acreage of preserved land. Additionally, impacts to 0.17 acre of streambeds would be mitigated through the creation of 0.34 acre of wetlands habitat outside the grading limits, thereby increasing wetland habitat on the project site.
i. Preserve Carroll Canyon in its present state and encourage its inclusion in the open space network.	As discussed under Overall Community Goal (a), the open space located south of Pomerado Road and north of the project's grading footprint would be preserved as MSCP land via a Covenant of Easement.
j. Permit equestrian use of open spaces south of Pomerado Road.	The passive open space corridor along Pomerado Road and Carroll Canyon Creek would be preserved in its existing condition.
k. Request the dedication of usable open space which has slopes less than 30 percent.	As discussed under Overall Community Goal (a), the open space located south of Pomerado Road and north of the project's grading footprint would be preserved and preserved as MSCP land via a Covenant of Easement.

TABLE 4.1-1
SUMMARY OF PROJECT CONSISTENCY WITH APPLICABLE LAND USE PLANS GOALS AND OBJECTIVES
(continued)

Objectives	Consistency Evaluation
Public Facilities and Services Objectives a. Provide a high level of health care, ambulance service, and fire protection.	The project includes the construction of a Health Center that would be staffed with medical professionals 24 hours per day. This would reduce the SDFD's need to respond to non-medical emergency calls. Health Center staff would have the ability to call 9-1-1 and medically assess residents to determine if the request is a medical emergency or a routine care assistance issue. Payment of required FBAs would ensure that direct impacts to fire protection and emergency services would be less than significant.
b. Promote a high level of law enforcement and support coordination and communication between the community and law enforcement agencies.	Prior to the issuance of building permits, the applicant is required to pay FBA fees that would address capital costs of police services. Impacts to police services would be less than significant. See Section 4.11.3.
c. Assure the availability of all utilities needed for new development.	The project applicant would provide all necessary infrastructure and utilities to the project site. The project would comply with all City of San Diego policies regarding the payment of FBAs to ensure that the development would not significantly impact existing and future utilities.
Transportation Objectives a. Alleviate current traffic congestion and prevent chronic congestion in the future, particularly for access to and from I-15.	See Overall Community Goal (j). The increase in traffic on Pomerado Road would conflict with this SMRCP goal and would result in a **significant land use impact**.
b. Preserve and enhance the forested and hilly character of the community. Provide low-maintenance landscaping along roadways, wherever appropriate, which emphasizes the use of eucalyptus trees.	As discussed under Overall Community Goal (a), the open space located south of Pomerado Road and north of the project's grading footprint would be preserved as MSCP land via a Covenant of Easement. This would include the preservation and dedication of 5.49 acres of eucalyptus woodland.
c. Provide a continuous pedestrian, equestrian and bicycle system throughout the community in conjunction with open space areas, minimizing conflicts with vehicular traffic patterns.	The Carroll Canyon corridor, which would be preserved by the project, allows for pedestrian, bicycle, and equestrian use adjacent Carroll Canyon Creek. Pomerado Road and Miramar Road include Class II bicycle lanes. The project would not impact the continuous pedestrian, equestrian, and bicycle system in the community. Access to the project site would be provided via the intersection of Pomerado Road and Chabad Center Driveway. This intersection currently has a signalized crosswalk. As discussed previously, the project would result in a significant traffic increase on Pomerado Road. However, the project would not result in conflicts between vehicular traffic patterns and pedestrian, equestrian, and bicycle activities.

TABLE 4.1-1
SUMMARY OF PROJECT CONSISTENCY WITH APPLICABLE LAND USE PLANS GOALS AND OBJECTIVES
(continued)

Objectives	Consistency Evaluation
d. Encourage and facilitate the use of public transit, carpools and bicycles within and outside the community in conjunction with ongoing citywide programs.	The project would provide bus, car, and van shuttles for shopping, doctor visits, and outings for the future residents. A 28-passenger bus and a 24-passenger bus are proposed for the project, along with one van and two cars. This service would provide residences with access to commercial uses along the I-15 corridor and other off-site areas.
e. Provide adequate access to all community resources and areas, with an emphasis on safety, aesthetics and integration of facilities.	See Transportation Objective (d). Additionally, the passive open space corridor along Pomerado Road and Carroll Canyon Creek would be preserved in its existing condition and preserved as MSCP land via a Covenant of Easement.
f. Minimize the number of driveways opening onto four-lane streets and Pomerado Road.	Project access would be provided by Chabad Center Driveway off of Pomerado Road. The intersection is currently signalized. The project would not create a new driveway opening onto Pomerado Road.
g. Accommodate transportation needs for Alliant International University and University of California at San Diego.	The project would have no impact on transportation needs for Alliant International University or University of California at San Diego. See also Overall Community Goal (f).

TABLE 4.1-1
SUMMARY OF PROJECT CONSISTENCY WITH APPLICABLE LAND USE PLANS GOALS AND OBJECTIVES
(continued)

Objectives	Consistency Evaluation
Community Environment Objectives a. Encourage types and patterns of development which minimize the problems of air and water pollution, natural fire hazards, soil erosion, siltation, slope instability, flooding and severe hillside cutting and scarring.	Air Quality – The project would conform to all federal, state and regional air quality standards. The project would be consistent with the growth assumptions of the RAQS and TCM. Additionally, maximum emissions would be less than the applicable SDAPCD thresholds for all criteria pollutants during construction and operation of the project. Water Quality – The project would include private storm drain facilities that would collect runoff and outlet it into the existing natural drainage creek adjacent to Pomerado Road. The development of the project would not result in an increase in runoff. Because the proposed drainage patterns would be consistent with the existing conditions, the project would have no adverse impacts on the downstream facilities. Additionally, because the project would not result in a change in peak flows or drainage patterns, there would be no impact to existing significant biological resources, including wetlands or other significant environmental resources. The project would include water quality measures identified in applicable water quality control programs. The project has been designed to limit post-development storm water runoff discharge rates and velocities to maintain or reduce pre-development erosion and to reduce nutrients, organic compounds, oxygen demanding substances, oil and grease, bacteria and viruses and pesticides by applying BMPs. Fire Hazards – A brush management plan has been prepared for the project based on the current alternative compliance requirements of the LDC and San Diego Fire Prevention Bureau Policy B-08-1. The brush management plan would encompass 7.3 acres. The project would be designed in accordance with applicable safety standards, including the preparation of a site-specific emergency evacuation plan. See also Public Facilities and Services Objective (a). Geologic Hazards – The project site contains geologic or soils conditions that may be unstable or become unstable as a result of development on the project site. However, the project would comply with the recommendations contained in the geotechnical investigation as well as applicable building and grading regulations to ensure that no impacts from geologic conditions would result with project implementation.

TABLE 4.1-1
SUMMARY OF PROJECT CONSISTENCY WITH APPLICABLE LAND USE PLANS GOALS AND OBJECTIVES
(continued)

Objectives	Consistency Evaluation
a. (cont.)	Steep Slopes – Steep Hillside Guidelines design standards have been incorporated into the project design.
b. Permit only compatible land uses within and adjacent to recreation areas, open spaces, Carroll Canyon and Miramar Reservoir.	See Overall Community Goal (a). The passive open space corridor along Pomerado Road and Carroll Canyon Creek would be preserved in its existing condition and preserved as MSCP land. The project would incorporate design features consistent with the City's MHPA Land Use Adjacency Guidelines.
c. Encourage preservation of significant natural features of the area, such as Carroll Canyon, and avoid creation of a totally urbanized landscape.	See Overall Community Goal (a). The passive open space corridor along Pomerado Road and Carroll Canyon Creek would be preserved in its existing condition and preserved as MSCP land.
d. Minimize visual impacts associated with land uses in and around Carroll Canyon and Miramar Reservoir.	See Overall Community Goal (a) and (d). The passive open space corridor along Pomerado Road and Carroll Canyon Creek would be preserved in its existing condition and preserved as MSCP land. The grading would blend into the natural topography, the Carroll Canyon open space would be preserved, and existing and proposed landscaping and topography would screen buildings from view.
e. Maximize the utility of open spaces as wildlife habitat by creating contiguous open space systems.	See Overall Community Goal (a). The passive open space corridor along Pomerado Road and Carroll Canyon Creek would be preserved in its existing condition and preserved as MSCP land.
f. Preserve the habitats of sensitive and/or critical biological resources.	See Overall Community Goal (a). The passive open space corridor along Pomerado Road and Carroll Canyon Creek would be preserved in its existing condition and preserved as MSCP land. The proposed MHPA boundary line adjustment would be beneficial to the overall MHPA preserve at this location due to an increase in Tier II habitat and acreage of preserved land.
g. Support the reduction or elimination of aircraft and motor noise and potential safety and environmental hazards.	Traffic-related noise due to proximity to Pomerado Road would not exceed indoor/outdoor noise level standards and regulations. Project-related traffic noise increases would be less than 3 dB, and would not be audible to off-site residents. The project site is outside the 60 CNEL contour of MCAS Miramar. Noise-sensitive receptors would not be exposed to excessive aircraft noise.
h. Encourage the preservation of significant historic and archaeological sites.	Although the site is not believed to hold any historical or cultural resources, mitigation and monitoring measures would assure that were any artifacts or remains encountered in the grading/demolition/construction/post-construction phases, such resources would be properly handled and preserved.

TABLE 4.1-1
SUMMARY OF PROJECT CONSISTENCY WITH APPLICABLE LAND USE PLANS GOALS AND OBJECTIVES
(continued)

Objectives	Consistency Evaluation
i. Minimize visual pollution by controlling location, size, design, maintenance and lighting of outdoor signs.	The proposed project would not create a substantial amount of light or glare that would adversely affect daytime or nighttime views. Project lighting would comply with applicable regulations, including the MSCP Subarea Plan Land Use Adjacency Guidelines and San Diego's Outdoor Lighting Regulations (LDC Section 142.0740).
j. Encourage water and energy conservation, water and sewage reclamation and use of natural channels for drainage systems.	The project has been designed to comply with the general Climate Change and Sustainable Development goals contained in the General Plan's Conservation Element. Project design features would serve to reduce or avoid potential environmental effects associated with water and energy consumption, consumption of non-renewable or slowly-renewing resources, urban runoff and water quality, and greenhouse gas (GHG) emissions. The project would be constructed in accordance with the California Green Building Standards Code (CALGreen) and would achieve GHG reductions through green building design that includes improved energy efficiency and water conservation. Specific sustainable project design elements are discussed in further detail in Section 3.4.8.
Social Needs Objectives a. Maintain and amplify the special quality of life that exists in Scripps Miramar Ranch, with emphasis on both community and individual needs.	The project would provide housing for older adults who have previously been living independently, and desire advanced age services, maintenance-free living, and healthcare support. The project would support its residents' individual needs and provide a sense of community.
b. Assist the family in obtaining assets needed to nurture all its members to a full and productive existence.	See Social Needs Objective (a).
Design Objectives a. Protect environmental resources that are typically associated with hillsides, preserve significant public views of and from hillsides, and maintain a clear sense of natural hillside topography throughout the development of Scripps Miramar Ranch.	See Overall Community Goal (a) and Residential Objectives (b) through (h). The passive open space corridor along Pomerado Road and Carroll Canyon Creek would be retained in its existing condition and preserved as MSCP land. Steep Hillside Guidelines design standards have been incorporated into the project design.
b. Encourage a sensitive form of development on the community's hillsides by allowing for their reasonable use in a manner which complements their natural character and relates to the visual environmental character of the community and the Open Space Element of the General Plan.	See Overall Community Goal (a) and Residential Objectives (b) through (h). The project would not significantly impact the public's use, visual or physical, of Carroll Canyon. The passive open space corridor along Pomerado Road and Carroll Canyon Creek would be preserved in its existing condition. Existing and proposed landscaping and topography would screen buildings from view. The project would be consistent with the overall neighborhood character.

TABLE 4.1-1
SUMMARY OF PROJECT CONSISTENCY WITH APPLICABLE LAND USE PLANS GOALS AND OBJECTIVES
(continued)

Objectives	Consistency Evaluation
c. Encourage design diversity and variety of interpretation but avoid visual chaos and incongruity.	The project would not create a disorganized appearance or conflict significantly with the height, bulk, and coverage regulations. Retaining walls exceeding six feet in height would not be visible to the public, and the project would not create an exceedingly monotonous visual environment. See also Residential Objectives (b) through (h).
d. Foster a sense of neighborhood identity by encouraging design diversity between development subunits while promoting design integration and compatibility within neighborhood concept areas.	The project would provide a range of on-site amenities for its residents including a Commons Building consisting of learning centers, a lecture hall, a library, an auditorium, fine dining, fine arts facilities, a tennis court, gardens, a fitness center, and a pool. The project has been designed for walking and would include outdoor gathering places. The project would support its residents' individual needs and provide a sense of community.
CITY OF SAN DIEGO GENERAL PLAN	
Land Use and Community Planning Element Applicable goals: A. <u>City of Villages Strategy</u> • Mixed-use villages located throughout the City and connected by high-quality transit.	The project would provide a range of on-site amenities for its residents including a Commons Building consisting of learning centers, a lecture hall, a library, an auditorium, fine dining, fine arts facilities, a tennis court, gardens, a fitness center, and a pool. Therefore, the project itself would be a small on-site village. The project would also provide extensive bus, van, and car services. A 28-passenger bus and a 24-passenger bus are proposed for the project, along with one van and two cars. This service would provide residences with access to commercial uses along the I-15 corridor and other off-site area. The project would be consistent with the City of San Diego's "City of Villages" goal.
G. <u>Airport Land Use Compatibility</u> • Protection of public use airports and military air installations from the encroachment of incompatible land uses within an airport influence area that could unduly constrain airport operations.	The project site is located within the airport influence area for MCAS Miramar. The MCAS Miramar runways are approximately 2.5 miles southwest of the project. The project would be compatible with the adopted ALUCP (see Section 4.1.6).
H. <u>Balanced Communities and Equitable Development</u> • Ensure diverse and balanced neighborhoods and communities with housing available for households of all income levels.	The project would provide diversity in housing by constructing a continuing care retirement center in a community that otherwise lacks this type of housing.

TABLE 4.1-1
SUMMARY OF PROJECT CONSISTENCY WITH APPLICABLE LAND USE PLANS GOALS AND OBJECTIVES
(continued)

Objectives	Consistency Evaluation
I. Environmental Justice • Ensure a just and equitable society by incising public outreach and participation in the planning process. • Improve mobility options and accessibility in every community.	• Various means of public outreach have attended the project proposal. A Notice of Preparation (NOP) was distributed in July 2013 for a 30-day public review and comment period. Public comments were received on the NOP for this EIR. In addition, a public scoping meeting was held in July 2013. Comment forms were collected from the attendees of that meeting as well as from electronic mail. These comment forms are also included in Appendix A. The issues that were raised in the comments and forms by the public agencies, local groups, and individuals are evaluated in the EIR. In addition, the project design proposal and this environmental impact report have been made available for public review and numerous meetings with various community groups. • The project would provide van, shuttle, and car services to its residents. The project has been designed to be universally accessible and all proposed structures have been designed to be accessible in accordance with applicable building codes.
Mobility Element Applicable goals: A. Walkable Communities • A safe and comfortable pedestrian environment. • A complete, functional and interconnected pedestrian network, that is accessible to pedestrians of all abilities. • Greater walkability achieved through pedestrian-friendly street, site and building design.	The internal pedestrian system and pedestrian linkages proposed for the project would provide connectivity and continuity. Pedestrians would also have access to Chabad Center Driveway and Pomerado Road. Trees, landscaping, and gardens would be planted to provide shade and visual interest. Sidewalks would meet Americans with Disabilities Act requirements.
B. Transit • Increased transit ridership.	The nearest MTS bus stop is at Willow Creek Road and Aviary Drive, approximately one mile from the project site. The project would also provide bus, van, and car services. A 28-passenger bus and a 24-passenger bus are proposed for the project, along with one van and two cars. This service would provide residences with access to commercial uses along the I-15 corridor and other off-site areas.

TABLE 4.1-1
SUMMARY OF PROJECT CONSISTENCY WITH APPLICABLE LAND USE PLANS GOALS AND OBJECTIVES
(continued)

Objectives	Consistency Evaluation
D. Street and Freeway System • An interconnected street system that provides multiple linkages within and between communities. • Vehicle congestion relief. • Safe and efficient street design that minimizes environmental and neighborhood impacts. • Well maintained streets.	The project would provide internal pedestrian system and pedestrian linkages to Pomerado Road. The project would not interfere with the corridor along Pomerado Road that allows for pedestrian, bicycle, and equestrian use adjacent Carroll Canyon Creek open space. The regional transportation network in the project area consists of I-15 to the west and State Route 52 to the south. Pomerado Road fronts the northern border of the project site and provides primary local access to the project area as well as a regional east–west travel way through the Scripps Miramar Ranch Community. Access to the project site would be provided by Chabad Center Driveway from Pomerado Road. The project would not result in a significant impact to area freeways. However, the project would result in significant direct and cumulative impacts to Pomerado Road as a result of the increase in traffic. Since Pomerado Road would not be widened to four lanes (see Section 4.2), direct and cumulative traffic impacts would remain significant and unmitigated. This would also result in a conflict with this General Plan goal and would result in a significant land use impact.
E. Transportation Demand Management • Reduced single-occupant vehicular traffic on congested streets and freeways. • Expanded travel options and improved personal mobility.	TDM is a general term for strategies that assist in reducing demand by single-occupant vehicles in order to increase the efficiency of existing transportation systems. These strategies are primarily directed at weekday commuters. As discussed, the project would provide shuttle, van, and car services for its residents. Additionally, based on observations at similar facilities, residents and visitors often choose to not travel during peak AM and PM hours. The project would be consistent with this goal.
F. Bicycling • A city where bicycling is a viable travel choice, particularly for trips of less than five miles. • A safe and comprehensive local and regional bikeway network.	Within the project area, Pomerado Road and Miramar Road include Class II bicycle lanes. These bikeways can provide access to several public transit (bus) stops.
G. Parking Management • Parking that is reasonably available when and where it is needed through management of the supply. • Increased land use efficiencies in the provision of parking.	A minimum of 434 parking spaces would be required for the project. A total of 558 parking spaces would be provided, exceeding the parking requirement by 124 parking spaces.

TABLE 4.1-1
SUMMARY OF PROJECT CONSISTENCY WITH APPLICABLE LAND USE PLANS GOALS AND OBJECTIVES
(continued)

Objectives	Consistency Evaluation
Urban Design Element Applicable goals: A. <u>General Urban Design</u> • A built environment that respects San Diego's natural environment and climate. • An improved quality of life through safe and secure neighborhoods and public places. • A pattern and scale of development that provides visual diversity, choice of lifestyle, and opportunities for social interaction. • A City with distinctive districts, communities, neighborhoods, and village centers where people gather and interact. • Utilization of landscape as an important aesthetic and unifying element throughout the City.	• The project design includes numerous elements that address San Diego's climate and environment. For instance, through the use of native or California-friendly drought-tolerant plants in project landscaping, efficient irrigation, and installation of low-flow water plumbing fixtures, water consumption would be reduced and impacts to natural water resources and the municipal water supply and wastewater systems minimized. Additionally, the project would implement extensive green-building design measures, increase energy efficiency, increase lighting efficiency, and would be designed to be equivalent to LEED certified. • The project would be designed for safety and vandalism deterrence, and would include a guard house at the project entrance off of Chabad Center Driveway. • The project has been designed to allow for interaction between its residents. The project would provide a range of on-site amenities for its residents including a Commons Building consisting of learning centers, a lecture hall, a library, an auditorium, fine dining, fine arts facilities, a tennis court, gardens, a fitness center, and a pool. The internal pedestrian system and pedestrian linkages proposed for the project would provide connectivity and continuity. The project includes outdoor gathering places. • The proposed project design recognizes the significance of landscaping to aesthetics and unity. The intent of the plan is to treat each building with a unique accent while maintaining a cohesive theme throughout the design, with an emphasis on sustainability and aesthetics.
B. <u>Distinctive Neighborhoods and Residential Design</u> • Innovative design for a variety of housing types to meet the needs of the population.	The project would provide diversity in housing by constructing a continuing care retirement center in a community that otherwise lacks this type of housing. The overall design theme for the project would be an old ranch design with old stone walls, boulders, and tree groves. Through design elements, the project would enhance community character while providing a diversity of visual landscape.

TABLE 4.1-1
SUMMARY OF PROJECT CONSISTENCY WITH APPLICABLE LAND USE PLANS GOALS AND OBJECTIVES
(continued)

Objectives	Consistency Evaluation
Public Facilities, Services, and Safety Element Applicable goals: D. Fire-Rescue • Protection of life, property, and environment by delivering the highest level of emergency and fire-rescue services, hazard prevention, and safety education.	The project includes the construction of a Health Center that would be staffed with medical professionals 24 hours per day. This would reduce the SDFD's need to respond to non-medical emergency calls. Health Center staff would have the ability to call 9-1-1 and medically assess residents to determine if the request is a medical emergency or a routine care assistance issue. Payment of required FBA fees would ensure that direct impacts to fire protection and emergency services would be less than significant.
F. Wastewater • Environmentally sound collection, treatment, re-use, disposal, and monitoring of wastewater.	Existing public sewer facilities would have adequate capacity and cleansing velocities to serve the project and the drainage basin in which it lies. Therefore the project would not result in any significant impact to the system of wastewater collection, treatment, and disposal already implemented by the City for the area.
G. Storm Water Infrastructure • Protection of beneficial water resources through pollution prevention and interception efforts.	The project would include private storm drain facilities that would collect runoff and outlet it into the existing natural drainage creek adjacent to Pomerado Road. Because the proposed drainage patterns would be consistent with the existing conditions, the project would have no adverse impacts on the downstream facilities. Additionally, because the project would not result in a change in peak flows or drainage patterns, there would be no impact to existing significant biological resources, including wetlands or other significant environmental resources. The project would include water quality measures identified in applicable water quality control programs. The project has been designed to limit post-development storm water runoff discharge rates and velocities to maintain or reduce pre-development erosion and to reduce nutrients, organic compounds, oxygen demanding substances, oil and grease, bacteria and viruses and pesticides by applying BMPs.
H. Waste Management • Maximum diversion of materials from disposal through the reduction, reuse and recycling of wastes to the highest and best use.	The project would generate large amounts of solid waste through demolition, construction, and operation. However, the project would comply with state and City requirements to reduce solid waste generation through implementation of a waste management plan (WMP) and adherence to applicable regulations, including the City's Municipal Code. The WMP prepared for the project includes plans for a waste management program with measures to provide sufficient interior and exterior storage space for refuse and recyclable materials, and measures to handle landscaping and green waste materials.

TABLE 4.1-1
SUMMARY OF PROJECT CONSISTENCY WITH APPLICABLE LAND USE PLANS GOALS AND OBJECTIVES
(continued)

Objectives	Consistency Evaluation
M. Public Utilities • Public utilities that sufficiently meet existing and future demand with facilities and maintenance practices that are sensible, efficient and well-integrated into the natural and urban landscape.	The project applicant would provide all necessary infrastructure and utilities to the project site. The Water Supply Assessment prepared for the project determined that there would be adequate water supplies to service project water demands. The hydraulic analysis conducted for the project determined that the proposed infrastructure would support a minimum pressure, would not exceed the maximum velocity, and would supply adequate pressure for the project. The infrastructure would meet City Water Department Facility Design Guidelines. The sewer study prepared for the project determined that the proposed on-site private sewer mains and existing public sewer main in Chabad Center Driveway meet City guidelines. Finally, the WMP prepared for the project determined that the project would meet adequate waste reduction needs and would meet City regulations. Public utilities for the project would be sufficient to meet project demands.
O. Healthcare Services and Facilities • Public and private healthcare services and facilities that are easily accessible and meet the needs of all residents.	The project includes the construction of a Health Center that would address the needs of the residents by providing 50 Acute Assisted Living Units and 60 Skilled Nursing Beds. The Health Center would provide care and skilled nursing services for residents with Alzheimer's disease or other types of dementia. The Health Center would be staffed with medical professionals 24 hours per day.
Q. Seismic Safety • Protection of public health and safety through abated structural hazards and mitigated risks posed by seismic conditions.	The project would comply with all City of San Diego codes and regulation regarding mitigation of seismic hazards. These measures would assure maximum protection of public health and safety.
Historic Preservation Element Applicable goals: A. Identification and Preservation of Historical Resources • Identification of the historical resources of the City. • Preservation of the City's important historical resources.	Although the site is not believed to hold any historical or cultural resources, mitigation and monitoring measures would assure that were any artifacts or remains encountered in the grading/demolition/construction/post-construction phases, such resources would be properly handled and preserved.

TABLE 4.1-1
SUMMARY OF PROJECT CONSISTENCY WITH APPLICABLE LAND USE PLANS GOALS AND OBJECTIVES
(continued)

Objectives	Consistency Evaluation
Recreation Element Applicable goals: B. Preservation • Preserve, protect and enhance the integrity and quality of existing parks, open space, and recreation programs citywide.	The project would preserve the existing MHPA on the project site. The open space located south of Pomerado Road and north of the project's grading footprint would be preserved. With the proposed MHPA boundary line adjustment, 1.87 acres would be removed from the MHPA and 7.46 acres of land would be added as MHPA and preserved as MSCP land via a Covenant of Easement. As a result of this on-site land exchange, the total MHPA land on-site would total 9.90 acres. The proposed MHPA boundary line adjustment would be beneficial to the overall MHPA preserve at this location due to an increase in Tier II habitat and acreage of preserved land.
C. Accessibility • Provision of an inter-connected park and open space system that is integrated into and accessible to the community.	As discussed above, the open space located south of Pomerado Road and north of the project's grading footprint would be preserved. As such, the passive open space corridor along Pomerado Road and Carroll Canyon Creek would be preserved in its existing condition.
F. Open Space Lands and Resource-Based Parks • An open space and resource-based park system that provides for the preservation and management of natural resources, enhancement of outdoor recreation opportunities, and protection of the public health and safety. • Preservation of the natural terrain and drainage systems of San Diego's open space lands and resource-based parks. • A system of pedestrian, bicycle and equestrian paths linking communities, neighborhoods, parks, and the open space system.	Approximately 7.46 acres of land to be preserved as MSCP land via a Covenant of Easement. As a result of this land exchange, the revised MHPA land on-site would total 9.90 acres more than the existing condition.
Conservation Element Applicable goals: A. Climate Change and Sustainable Development • To reduce the City's overall carbon dioxide footprint by improving energy efficiency, increasing use of alternative modes of transportation, employing sustainable planning and design techniques, and providing environmentally sound waste management.	The project has been designed to comply with the general Climate Change and Sustainable Development goals contained in the General Plan's Conservation Element. Project design features would serve to reduce or avoid potential environmental effects associated with water and energy consumption, consumption of non-renewable or slowly-renewing resources, urban runoff and water quality, and greenhouse gas (GHG) emissions. The project would be constructed in accordance with the California Green Building Standards Code (CALGreen) and would achieve GHG reductions through green building design that includes improved energy efficiency and water conservation. Specific sustainable project design elements are discussed in further detail in Section 3.4.8.

TABLE 4.1-1
SUMMARY OF PROJECT CONSISTENCY WITH APPLICABLE LAND USE PLANS GOALS AND OBJECTIVES
(continued)

Objectives	Consistency Evaluation
B. Open Space and Landform Preservation • Preservation and long-term management of the natural landforms and open spaces that help make San Diego unique.	Approximately 7.46 acres of land to be preserved as MSCP land via a Covenant of Easement. As a result of this land exchange, the revised MHPA land on-site would total 9.90 acres more than the existing condition. The grading would blend into the natural topography, the Carroll Canyon open space would be preserved, and existing and proposed landscaping and topography would screen buildings from view.
C. Coastal Resources • Clean coastal waters by continuing to improve the quality of ocean outfall discharges.	Runoff from the project site flows directly into Carroll Canyon Creek which discharges to Los Peñasquitos Lagoon and eventually to the Pacific Ocean. The project would conform to all federal, state and regional standards regarding urban runoff. The project design incorporates features to reduce pollutant discharge off-site, thus avoiding significant adverse water quality impacts to the Peñasquitos Lagoon, a 303(d) impaired receiving water body. As a result of the installation of water quality measures and BMPs that are not currently present on-site, the project would not have a significant adverse impact on water quality of runoff leaving the site. Through the proposed use of BMPs, implementation of the project would result in water quality impacts that would be improved over the existing condition.
D. Water Resources Management • Effective long-term management of water resources so that demand is in balance with efficient, sustainable supplies.	The project would maximize water efficiency within buildings to reduce the burden on municipal water supply and wastewater systems. The project would include a drought tolerant landscape, high efficient irrigation, and water efficient plumbing fixtures.
E. Urban Runoff Management • Protection and restoration of water bodies, including reservoirs, coastal waters, creeks, bays and wetlands.	The project would conform to all federal, state and regional standards regarding urban runoff. In accordance with these standards, various waste water BMPs would be implemented. The development of the project would not result in an increase in runoff. The project would include water quality measures identified in applicable water quality control programs. The project has been designed to limit post-development storm water runoff discharge rates and velocities to maintain or reduce pre-development erosion and to reduce nutrients, organic compounds, oxygen demanding substances, oil and grease, bacteria and viruses and pesticides by applying BMPs.
F. Air Quality • Regional air quality that meets state and federal standards.	The project would conform to all federal, state and regional air quality standards. The project would be consistent with the growth assumptions of the RAQS and TCM. Additionally, maximum emissions would be less than the applicable SDAPCD thresholds for all criteria pollutants during construction and operation of the project.

TABLE 4.1-1
SUMMARY OF PROJECT CONSISTENCY WITH APPLICABLE LAND USE PLANS GOALS AND OBJECTIVES
(continued)

Objectives	Consistency Evaluation
G. Biological Diversity • Preservation of healthy, biologically diverse regional ecosystem and conservation of endangered, threatened, and key sensitive species and their habitats.	As discussed previously, 7.46 acres of land would be added as MHPA and preserved as MSCP land via a Covenant of Easement. As a result of this on-site land exchange, the total MHPA land on-site would total 9.90 acres. The proposed MHPA boundary line adjustment would be beneficial to the overall MHPA preserve at this location due to an increase in Tier II habitat and acreage of preserved land. See Objective H for discussion of wetland habitats.
H. Wetlands • Preservation of San Diego's rich biodiversity and heritage through the protection and restoration of wetland resources. • Preservation of all existing wetland habitats in San Diego through a "no net loss" approach.	There is 0.71 acre of jurisdictional waters on the project site. Implementation of the project would result in impacts to 0.17 acre of these wetland and non-wetland streambed waters, and would preserve 0.54 acre. The 0.17 acre of impact would be to unvegetated streambed. However, these impacts would be mitigated through the creation of 0.34 acre of wetlands habitat outside the grading limits. This mitigation is based on a 2:1 mitigation ratio. As a result, the project would increase the amount of wetlands on-site and would not conflict with the General Plan goal of a "no net loss".
I. Sustainable Energy • An increase in local energy independence through conservation, efficient community design, reduced consumption, and efficient production and development of energy supplies that are diverse, efficient, environmentally-sound, sustainable, and reliable.	The project has been designed to comply with the general Climate Change and Sustainable Development goals contained in the General Plan's Conservation Element. Project design features would serve to reduce or avoid potential environmental effects associated with water and energy consumption, consumption of non-renewable or slowly-renewing resources, urban runoff and water quality, and greenhouse gas (GHG) emissions. The project would be constructed in accordance with the California Green Building Standards Code (CALGreen) and would achieve GHG reductions through green building design that includes improved energy efficiency and water conservation.
J. Urban Forestry • Protection and expansion of a sustainable urban forest.	As discussed above, the open space located south of Pomerado Road and north of the project's grading footprint would be preserved as MSCP land. This would include the preservation and dedication of 5.49 acres of existing eucalyptus woodland.

TABLE 4.1-1
SUMMARY OF PROJECT CONSISTENCY WITH APPLICABLE LAND USE PLANS GOALS AND OBJECTIVES
(continued)

Objectives	Consistency Evaluation
Noise Element Applicable goals: A. Noise and Land Use Compatibility • Consider existing and future noise levels when making land use planning decisions to minimize people's exposure to excessive noise.	The project does not contain any land use types or features that would generate excessive noise or significantly increase ambient noise. Exterior and interior noise levels on-site would not exceed the limits established in the General Plan. Project-related traffic noise increases would be less than 3 dB, and would not be audible to off-site residents. All necessary and required measures would be implemented to ensure compliance, where feasible, with indoor/outdoor noise level standards and regulations. Land use impacts due to noise exposure to on- and off-site receivers would be less than significant.
B. Motor Vehicle Traffic Noise • Minimal excessive motor vehicle traffic noise on residential and other noise-sensitive land uses.	Traffic-related noise due to proximity to Pomerado Road would not exceed indoor/outdoor noise level standards and regulations. Project-related traffic noise increases would be less than 3 dB, and would not be audible to off-site residents.
D. Aircraft Noise • Minimal excessive aircraft-related noise on residential and other noise-sensitive land uses.	The project site is outside the 60 CNEL contour of MCAS Miramar. Noise-sensitive receptors would not be exposed to excessive aircraft noise.
G. Construction, Refuse Vehicles, Parking Lot Sweepers, and Public Activity Noise • Minimal exposure of residential and other noise-sensitive land uses to excessive construction refuse vehicles, parking lot sweeper-related noise and public noise.	Construction noise levels would not exceed 75 dB(A) L_{eq} at the residential areas adjacent to the project site. The project would comply with construction time limits as required by the City of San Diego's Noise Abatement and Control Ordinance. Therefore, the project would not bar the achievement of this goal.

4.2 Traffic Circulation

The following traffic discussion is summarized from the Traffic Impact Analysis (TIA) prepared by Urban Systems Associates, Inc. in April 2013. The complete technical report is included in Appendix D of this EIR. Project impacts were analyzed for the existing, near-term, and horizon Year 2030 (long-term) scenarios.

4.2.1 Existing Conditions

4.2.1.1 Level of Service Standards

Level of service (LOS) is a professional industry standard by which to measure the operating conditions of a given roadway segment or intersection. LOS is defined on a scale of A to F, where LOS A through C represents free-flowing traffic conditions with little or no delay. LOS D represents limited congestion and some delay. However, the duration of periods of delay is acceptable to most people. LOS E and F represent significant delay on local streets, which are generally unacceptable for design purposes. These definitions are from the Highway Capacity Manual (Transportation Research Board 2000).

a. Street LOS

The City has developed LOS threshold tables based on the different functional street classifications and their ability to carry traffic. Actual capacity on some segments may be higher due to intersection widening, restricted access, and lane widening. For the City, LOS D is the acceptable LOS standard for roadways and intersections.

b. Intersection LOS

The City and Regional Congestion Management Program (CMP) guidelines, as adopted by the San Diego Association of Governments (SANDAG), determine the procedures to be used for intersection peak hour analysis. To determine an intersection peak hour LOS, the CMP guidelines require use of the most recent procedure from the Highway Capacity Manual (Transportation Research Board 2000). The procedure, which is used to analyze signalized intersections, is the “operational method.” This method determines LOS based on average control delay expressed in seconds. A computer program is used to complete the analysis. As discussed above, the City and CMP guidelines have established LOS D or better as the goal for intersections and street segments.

c. Congestion Management Plan

The CMP regional guidelines were developed by SANDAG to provide a set of procedures for completing enhanced CEQA review for certain projects. The guidelines prepared by SANDAG stipulate that any development project generating 2,400 or more average daily trips (ADT) or

200 or more peak-hour trips must be evaluated in accordance with the requirements of the Regional CMP. The CMP analysis must include the traffic LOS impacts on affected freeways and Regionally Significant Arterial systems, which include all designated CMP roadways. In order to conform to the region's CMP, local jurisdictions must adopt and implement a land use analysis program to assess impacts of land use decisions on the regional transportation system.

The project would generate 1,880 ADT and a maximum of 181 peak-hour trips; this is below the threshold for ADT's and peak-hour trips; therefore, a CMP analysis is not required.

d. California Department of Transportation Freeway Segment LOS

For freeway main lane segments, the California Department of Transportation (Caltrans) calculates LOS as a ratio of lane capacity per hour to volume per hour. This method focuses on the AM and PM peak hour for determining LOS rather than the 24-hour tables developed for circulation element roads. According to Regional CMP Guidelines, the allowable increase in volume-to-capacity ratio for freeway segments is 0.01 at LOS E or 0.005 at LOS F. Hourly capacity for freeway segments is based on data contained in *Guide for Preparation of Traffic Impact Studies* (Caltrans 2002). Also discussed in that guide are appropriate mitigation measures for freeway segments and interchanges.

Freeway ramp analysis is based on the mainline operation and the delay at the ramp meter. For a ramp meter to be considered operating at unacceptable levels, the mainline must be operating at unacceptable LOS E or F and the delay at the ramp meter must exceed 15 minutes. For the project impact to the ramp meter to be significant, the project must cause an increase in delay of 1.0 minute where mainline operations are LOS F or an increase in delay of 2.0 minutes where mainline operations are LOS E. The ramp meter analysis is based on the most restrictive meter rate provided by Caltrans.

4.2.1.2 Existing Circulation System

Figure 4.2-1 shows the study area street segments and intersections in the project area. Brief descriptions of the area's roadways are listed below.

Miramar Road. Miramar Road is functionally and ultimately classified as a six-lane Prime Arterial that is primarily and east-west roadway. On-street parking is not allowed along either side of the roadway within the interchange area evaluated. The roadway width curb to curb is 102 feet, and the posted speed limit is 45 miles per hour (mph). Class II bike lanes are included on the bridge.

Pomerado Road. Pomerado Road functions as a two-lane Collector with a painted median and is primarily an east-west roadway. On-street parking is not allowed along either side of the roadway. The roadway width curb to curb is 50 feet and the posted speed limit is 45 mph. Class II bike lanes are included on the roadway.

Map Source: Urban Systems Associates, Inc., 2013

Not to Scale

FIGURE 4.2-1
Study Area Boundary and Intersections

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4.2.1.3 Existing Traffic Volumes

a. Street Segments

Figure 4.2-2 shows existing average weekday volumes (ADT) on street segments within the study area. These volumes were taken from traffic counts conducted in March 2012. Freeway volumes were provided via the Caltrans website and counted in 2011.

Table 4.2-1 summarizes the existing street segment levels of service. As shown, all segments of Pomerado Road operate at unacceptable levels of service. Miramar Road between I-15 southbound ramps and I-15 northbound ramps operates at an acceptable LOS C.

TABLE 4.2-1
EXISTING STREET SEGMENT LEVELS OF SERVICE

Road	Segment	Jurisd.	Class.	Cap.	Volume	V/C	LOS
Miramar Road	I-15 SB Ramps to I-15 NB Ramps	SD	PA	60,000	41,208	0.69	C
Pomerado Road	I-15 NB Ramps to Willow Creek Road	SD	2-Ca	15,000	27,827	1.86	**F**
	Willow Creek Road to Scripps Ranch Boulevard	SD	2-Ca	15,000	22,038	1.47	**F**
	Scripps Ranch Boulevard to Chabad Center Driveway	SD	2-Ca	15,000	22,199	1.48	**F**
	Chabad Center Driveway to Avenida Magnifica	SD	2-Ca	15,000	21,847	1.46	**F**

Count Date: March 2012.
BOLD = Unacceptable LOS

Legend:
Jurisd. = Jurisdiction
SD = San Diego
Class. = Functional Class
Cap. = Capacity
LOS = Level of Service
PA = 6-lane Prime Arterial
2-Ca = 2-lane Collector with painted median/turn lane

Map Source: Urban Systems Associates, Inc., 2013

SOURCE

Transportation Studies, March 2012

Freeway Volumes: Caltrans, 2011

Not to Scale

FIGURE 4.2-2
Existing Average Daily Traffic

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b. Intersections

Table 4.2-2 shows the existing AM and PM peak hour intersection traffic data which was collected at the intersections in March 2012. As shown, all intersections currently operate at LOS D or better during the AM and PM peak hour periods except for the intersection of Pomerado Road and Willow Creek Road, which presently operates at LOS E during the PM peak hour and LOS F during the AM peak hour.

TABLE 4.2-2
EXISTING INTERSECTION LEVELS OF SERVICE

No.	Intersection	Control	AM Peak Hour		PM Peak Hour	
			Delay	LOS	Delay	LOS
1	Miramar Road/I-15 SB Ramps	Signalized	25.7	C	13.5	B
2	Miramar Road/I-15 NB Ramps	Signalized	15.8	B	14.2	B
3	Pomerado Road/Willow Creek Road	Signalized	82.0	**F**	58.2	**E**
4	Pomerado Road/Scripps Ranch Boulevard	Signalized	39.4	D	26.3	C
5	Chabad Center Driveway	Signalized	11.0	B	10.1	B
6	Pomerado Road/Avenida Magnifica	Signalized	39.4	D	36.4	D

BOLD = Unacceptable LOS

4.2.2 Significance Determination Thresholds

Based on the City's 2011 Significance Determination Thresholds, impacts related to traffic circulation would be significant if the project would:

1. Result in an increase in projected traffic, which is substantial in relation to the existing traffic load and capacity of the street system;

2. Result in traffic generation in excess of specific community plan allocations;

3. Result in the addition of a substantial amount of traffic to a congested freeway segment, interchange, or ramp;

4. Result in a substantial impact upon existing or planned transportation systems;

5. Result in an increase in traffic hazards for motor vehicles, bicyclists or pedestrians; due to a proposed non-standard design feature (e.g., poor sight distance or driveway onto an access-restricted roadway).

Direct and cumulative impacts related to traffic circulation would be significant if:

- Any intersection, roadway segment, or freeway segment affected by a project would operate at LOS E or F under either direct or cumulative conditions, the impact would be significant if the project exceeds the thresholds shown in Table 4.2-3, or if the project would cause intersection or segment LOS to degrade from acceptable to unacceptable.

- A project would increase traffic hazards to motor vehicles, bicyclists, or pedestrians due to proposed non-standard design features (e.g., poor sight distance, proposed driveway onto an access-restricted roadway).

- A project would result in the construction of a roadway which is inconsistent with the General Plan and/or a community plan, and would not properly align with other existing or planned roadways.

- A project would result in a substantial restriction in access to publicly or privately owned land.

TABLE 4.2-3
SIGNIFICANCE THRESHOLDS

	Allowable Change Due to Project Impact*					
	Freeways		Roadway Segments		Intersections	Ramp Metering
LOS with Project†	V/C	Speed (mph)	V/C	Speed (mph)	Delay (seconds)	Delay (minutes)
E (or ramp meter delays above 15 minutes)	0.010	1.0	0.02	1.0	2.0	2.0
F (or ramp meter delays above 15 minutes)	0.005	0.5	0.01	0.5	1.0	1.0

SOURCE: City of San Diego 1998a
*The allowable increase in delay at a ramp meter with more than 15 minutes delay and freeway LOS F is 1 minute.
†The allowable increase in delay at a ramp meter with more than 15 minutes delay and freeway LOS E is 2 minutes.

4.2.3 Issue 1: Traffic Capacity

Would the project result in an increase in project traffic which is substantial in relation to the existing traffic load and capacity of the street system?

4.2.3.1 Impacts

Pursuant to the thresholds described above, the definitions of direct and cumulative impacts are summarized below.

> *Direct traffic impacts* are those projected to occur under "existing + project" conditions and in the near-term at the time a proposed development becomes operational. The calculations include other operating projects and those not yet operational but which are anticipated to be operational when the proposed project goes into effect.
>
> *Cumulative traffic impacts* are those projected to occur in the long-term after a proposed development becomes operational, such as when affected community plan areas reach full planned buildout (long-term cumulative).

a. Project Traffic Generation

Trip generation is the vehicular traffic increase due to development of a specific land use. Vehicular traffic generation characteristics for the project were estimated based on rates in the City's *Trip Generation Manual*, dated May 2003. This manual provides standards and recommendations for the probable traffic generation for various land uses based upon local, regional, and nationwide studies of existing developments in comparable settings and are considered an acceptable basis for analysis by the City. In order to calculate the trip generation for the project, the City's trip rate was multiplied by the land use density. As shown in Table 4.2-4, the project would generate a total of 1,880 new ADTs, with 144 trips occurring in the AM peak hour and 181 trips occurring in the PM peak hour.

Figure 4.2-3 shows the project-only trip distribution. Figure 4.2-4 shows project-only volumes expected on the existing roadway network within the project study boundary.

b. Direct Impacts

Existing Without Project

The Existing Without Project condition is discussed in Section 4.2.1.3 above. As discussed, all street segments operate at unacceptable levels of service with the exception of Miramar Road between I-15 southbound ramps and I-15 northbound ramps, which operates at LOS C. All intersections currently operate at LOS D or better during the AM and PM peak hour periods except for the intersection of Pomerado Road and Willow Creek Road, which presently operates at LOS E during the PM peak hour and LOS F during the AM peak hour.

Existing With Project

The Existing With Project condition was analyzed to evaluate the project's direct impacts by comparing existing conditions without the project to existing conditions with the project.

TABLE 4.2-4
PROJECT TRIP GENERATION

Use	Intensity	Rate	ADT	AM					PM				
				Peak %	Vol.	In:Out	In	Out	Peak %	Vol.	In:Out	In	Out
Congregate Care	50 du	2 /du	100	3%	3	60%:40%	2	1	8%	8	50%:50%	4	4
Convalescent	60 beds	3 /bed	180	7%	13	60%:40%	8	5	7%	13	40%:60%	5	8
Retirement/Senior Housing	400 du	4 /du	1,600	8%	128	20%:80%	26	102	10%	160	70%:30%	112	48
TOTAL			1,880		144		35	109		181		121	60

du = dwelling units

Map Source: Urban Systems Associates, Inc., 2013

Not to Scale

FIGURE 4.2-3
Project Only Traffic Distribution

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Map Source: Urban Systems Associates, Inc., 2013

Not to Scale

FIGURE 4.2-4
Project Only Average Daily Traffic

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Street Segments

The trips generated by the project (as shown in Table 4.2-4) were added to the existing traffic volumes in order to create the Existing With Project average daily volumes. Figure 4.2-5 shows the Existing With Project ADT volumes on street segments within the study area. Table 4.2-5 shows the Existing With Project street segment LOS. As shown, all analyzed segments of Pomerado Road are projected to operate at an unacceptable LOS. Miramar Road between I-15 southbound ramps and I-15 northbound ramps would operate at an acceptable LOS C.

TABLE 4.2-5
EXISTING WITH PROJECT STREET SEGMENT LEVELS OF SERVICE

Road	Segment	Jurisd.	Class.	Cap.	Volume	V/C	LOS
Miramar Road	I-15 SB Ramps to I-15 NB Ramps	SD	PA	60,000	42,449	0.71	C
Pomerado Road	I-15 NB Ramps to Willow Creek Road	SD	2-Ca	15,000	29,181	1.95	**F**
	Willow Creek Road to Scripps Ranch Boulevard	SD	2-Ca	15,000	23,410	1.56	**F**
	Scripps Ranch Boulevard to Chabad Center Driveway	SD	2-Ca	15,000	23,703	1.58	**F**
	Chabad Center Driveway to Avenida Magnifica	SD	2-Ca	15,000	22,223	1.48	**F**

BOLD = Unacceptable LOS

Legend:
Jurisd. = Jurisdiction
SD = San Diego
Class. = Functional Class
Cap. = Capacity
LOS = Level of Service
PA = 6-lane Prime Arterial
2-Ca = 2-lane Collector with painted median/turn lane

Intersections

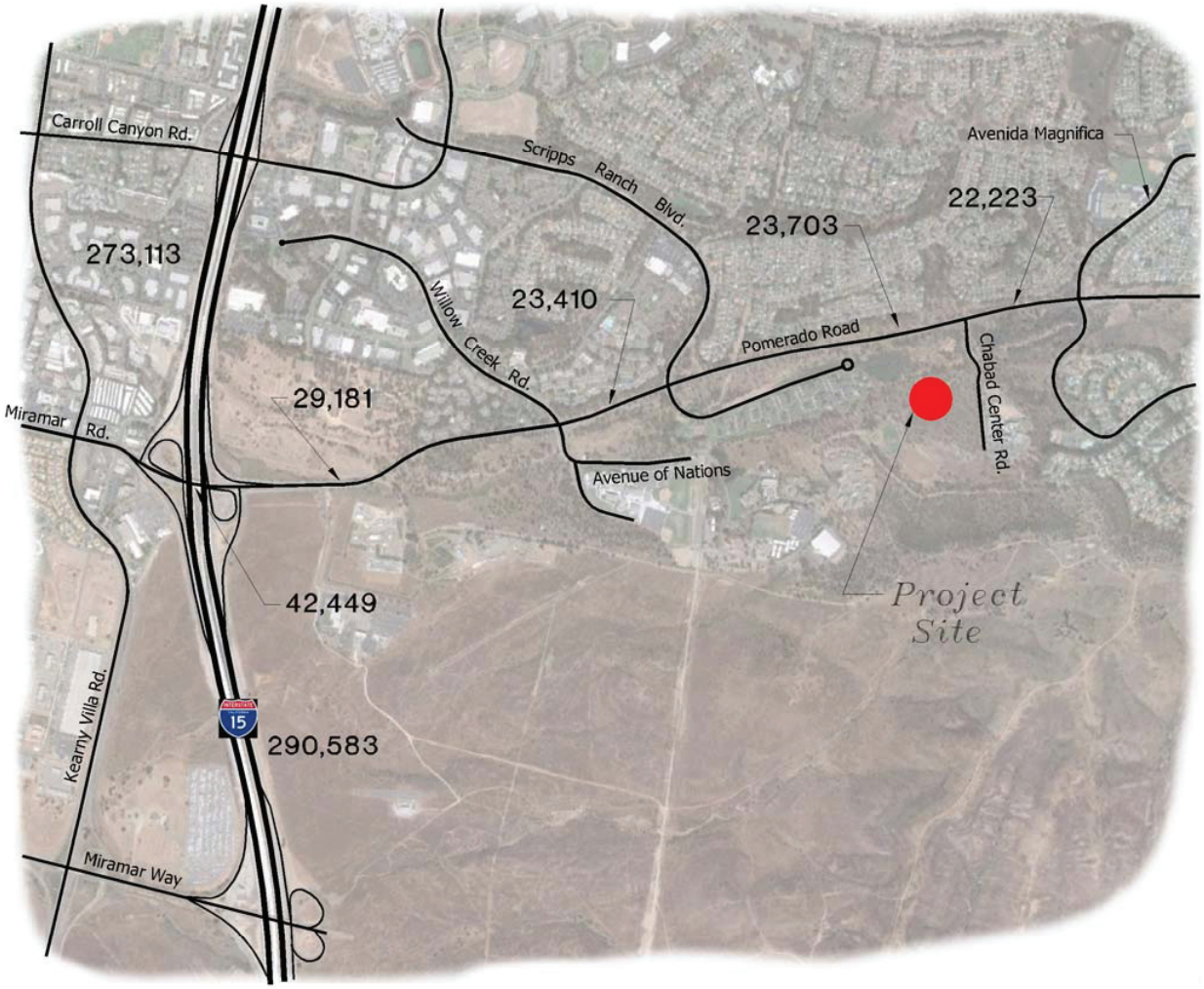
Table 4.2-6 shows the Existing With Project intersection LOS. As shown, only the intersection of Pomerado Road and Willow Creek Road operates at an unacceptable LOS.

TABLE 4.2-6
EXISTING WITH PROJECT INTERSECTION LEVELS OF SERVICE

No.	Intersection	Control	AM Peak Hour		PM Peak Hour	
			Delay	LOS	Delay	LOS
1	Miramar Road/I-15 SB Ramps	Signalized	26.6	C	13.9	B
2	Miramar Road/I-15 NB Ramps	Signalized	16.0	B	14.4	B
3	Pomerado Road/Willow Creek Road	Signalized	93.2	**F**	68.4	**E**
4	Pomerado Road/Scripps Ranch Boulevard	Signalized	50.0	D	29.9	C
5	Chabad Center Driveway	Signalized	15.5	B	13.6	B
6	Pomerado Road/Avenida Magnifica	Signalized	40.4	D	38.0	D

BOLD = Unacceptable LOS

Map Source: Urban Systems Associates, Inc., 2013



Not to Scale

FIGURE 4.2-5

Existing with Project Average Daily Traffic

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Near-term Without Project

A near-term analysis was conducted to determine impacts that would occur when the project becomes operational. As such, the analysis takes into account traffic from any projects anticipated to be in effect in the same timeframe as the project. From this information, it was determined that nine other proposed or approved but not yet constructed projects may have impacts within the project study area. After further research, only five other projects were found to contribute traffic within the project study area between the time of existing counts and the project's expected opening day in 2016 or 2017. The five projects included in this analysis along with the ADT that would be generated by the time the projects are projected to be open are listed below. Brief descriptions of these projects can be found in Section 7.0, Cumulative Impacts.

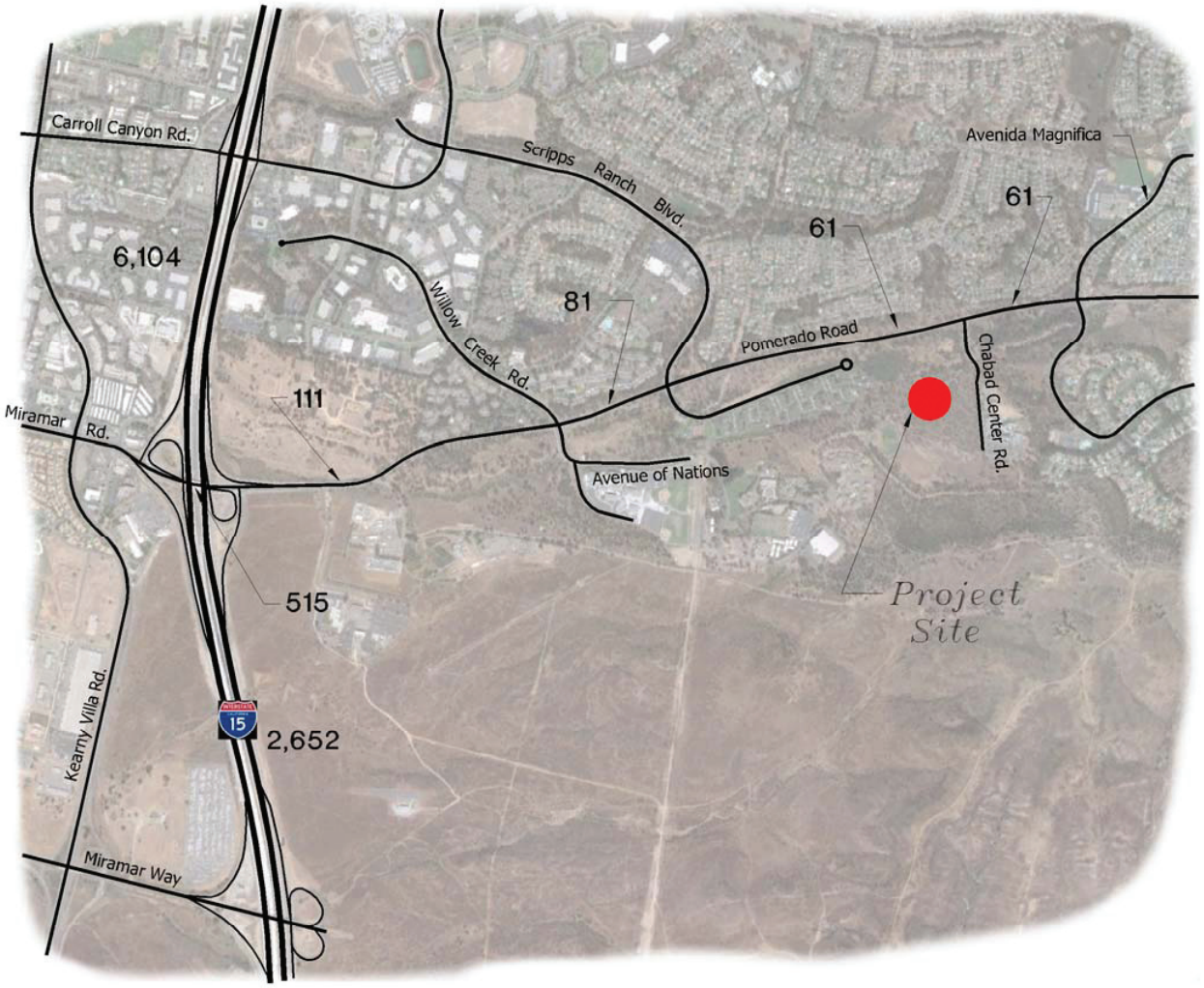
- Stone Creek – 12,500 ADT
- Miramar College – 3,117 ADT
- Casa Mira View I – 5,400 ADT
- Carroll Canyon Commercial Center – 7,095 ADT
- U.S. Army – 242 ADT

Volumes from these projects were added to existing traffic volumes to get near-term volumes. Figure 4.2-6 shows the "Other Projects" traffic volumes.

Street Segments

Figure 4.2-7 shows the daily traffic volumes in the Near-term Without Project condition. Table 4.2-7 shows the Near-term Without Project street segment LOS. As shown, all analyzed segments of Pomerado Road are projected to operate at an unacceptable LOS in the Near-term Without Project condition. Miramar Road between I-15 southbound ramps and I-15 northbound ramps would operate at an acceptable LOS C.

Map Source: Urban Systems Associates, Inc., 2013



Not to Scale

FIGURE 4.2-6
Other Projects Average Daily Traffic

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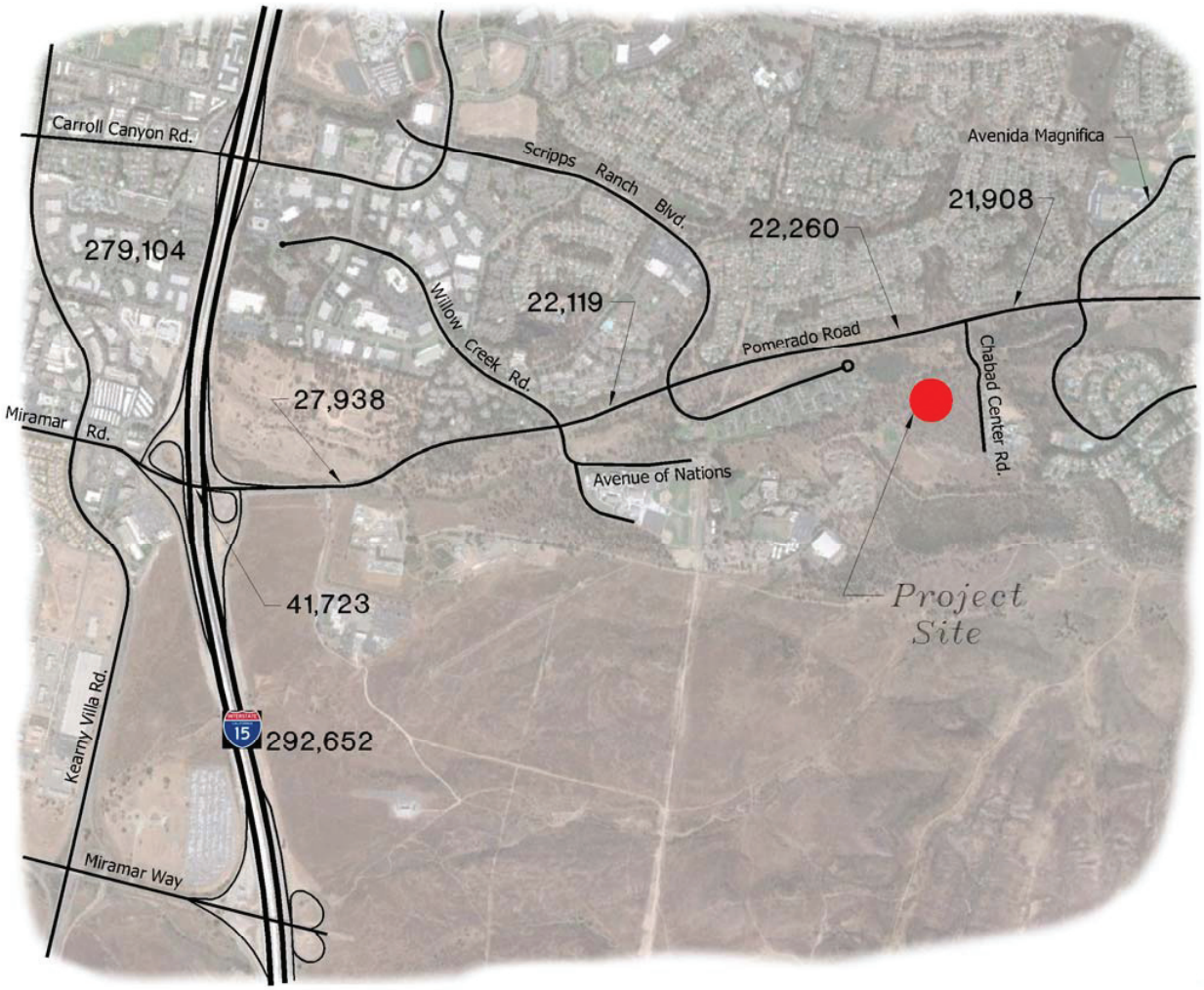
Map Source: Urban Systems Associates, Inc., 2013



Not to Scale

FIGURE 4.2-7

Near-term without Project Average Daily Traffic

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TABLE 4.2-7
NEAR-TERM WITHOUT PROJECT STREET SEGMENT LEVELS OF SERVICE

Road	Segment	Jurisd.	Class.	Cap.	Volume	V/C	LOS
Miramar Road	I-15 SB Ramps to I-15 NB Ramps	SD	PA	60,000	41,723	0.07	C
Pomerado Road	I-15 NB Ramps to Willow Creek Road	SD	2-Ca	15,000	27,938	1.86	**F**
	Willow Creek Road to Scripps Ranch Boulevard	SD	2-Ca	15,000	22,119	1.47	**F**
	Scripps Ranch Boulevard to Chabad Center Driveway	SD	2-Ca	15,000	22,260	1.48	**F**
	Chabad Center Driveway to Avenida Magnifica	SD	2-Ca	15,000	21,908	1.46	**F**

BOLD = Unacceptable LOS

Legend:
Jurisd. = Jurisdiction
SD = San Diego
Class. = Functional Class
Cap. = Capacity
LOS = Level of Service
PA = 6-lane Prime Arterial
2-Ca = 2-lane Collector with painted median/turn lane

Intersections

Table 4.2-8 shows the Near-term Without Project intersection LOS. As shown, only the intersection of Pomerado Road and Willow Creek Road operates at an unacceptable LOS.

TABLE 4.2-8
NEAR-TERM WITHOUT PROJECT INTERSECTION LEVELS OF SERVICE

			AM Peak Hour		PM Peak Hour	
No.	Intersection	Control	Delay	LOS	Delay	LOS
1	Miramar Road/I-15 SB Ramps	Signalized	26.1	C	14.3	B
2	Miramar Road/I-15 NB Ramps	Signalized	16.2	B	14.2	B
3	Pomerado Road/Willow Creek Road	Signalized	82.6	**F**	59.1	**E**
4	Pomerado Road/Scripps Ranch Blvd.	Signalized	39.4	D	26.4	C
5	Chabad Center Driveway	Signalized	11.0	B	10.1	B
6	Pomerado Road/Avenida Magnifica	Signalized	39.4	D	36.4	D

BOLD = Unacceptable LOS

Near-term With Project

This condition analyzes the near-term traffic volumes with the addition of the traffic generated by the project. This analysis identifies direct impacts of the project in the near-term condition.

Street Segments

Figure 4.2-8 shows the daily traffic volumes in the Near-term With Project condition. Table 4.2-9 shows the Near-term With Project street segment levels of service. As shown, all analyzed segments of Pomerado Road are projected to operate at an unacceptable LOS in the Near-term With Project condition. Miramar Road between I-15 southbound ramps and I-15 northbound ramps would operate at an acceptable LOS C.

TABLE 4.2-9
NEAR-TERM WITH PROJECT STREET SEGMENT LEVELS OF SERVICE

Road	Segment	Jurisd.	Class.	Cap.	Volume	V/C	LOS
Miramar Road	I-15 SB Ramps to I-15 NB Ramps	SD	PA	60,000	42,964	0.72	C
Pomerado Road	I-15 NB Ramps to Willow Creek Road	SD	2-Ca	15,000	29,292	1.95	**F**
	Willow Creek Road to Scripps Ranch Boulevard	SD	2-Ca	15,000	23,491	1.57	**F**
	Scripps Ranch Boulevard to Chabad Center Driveway	SD	2-Ca	15,000	23,764	1.58	**F**
	Chabad Center Driveway to Avenida Magnifica	SD	2-Ca	15,000	22,284	1.49	**F**

BOLD = Unacceptable LOS

Legend:
Jurisd. = Jurisdiction
SD = San Diego
Class. = Functional Class
Cap. = Capacity
LOS = Level of Service
PA = 6-lane Prime Arterial
2-Ca = 2-lane Collector with painted median/turn lane

Intersections

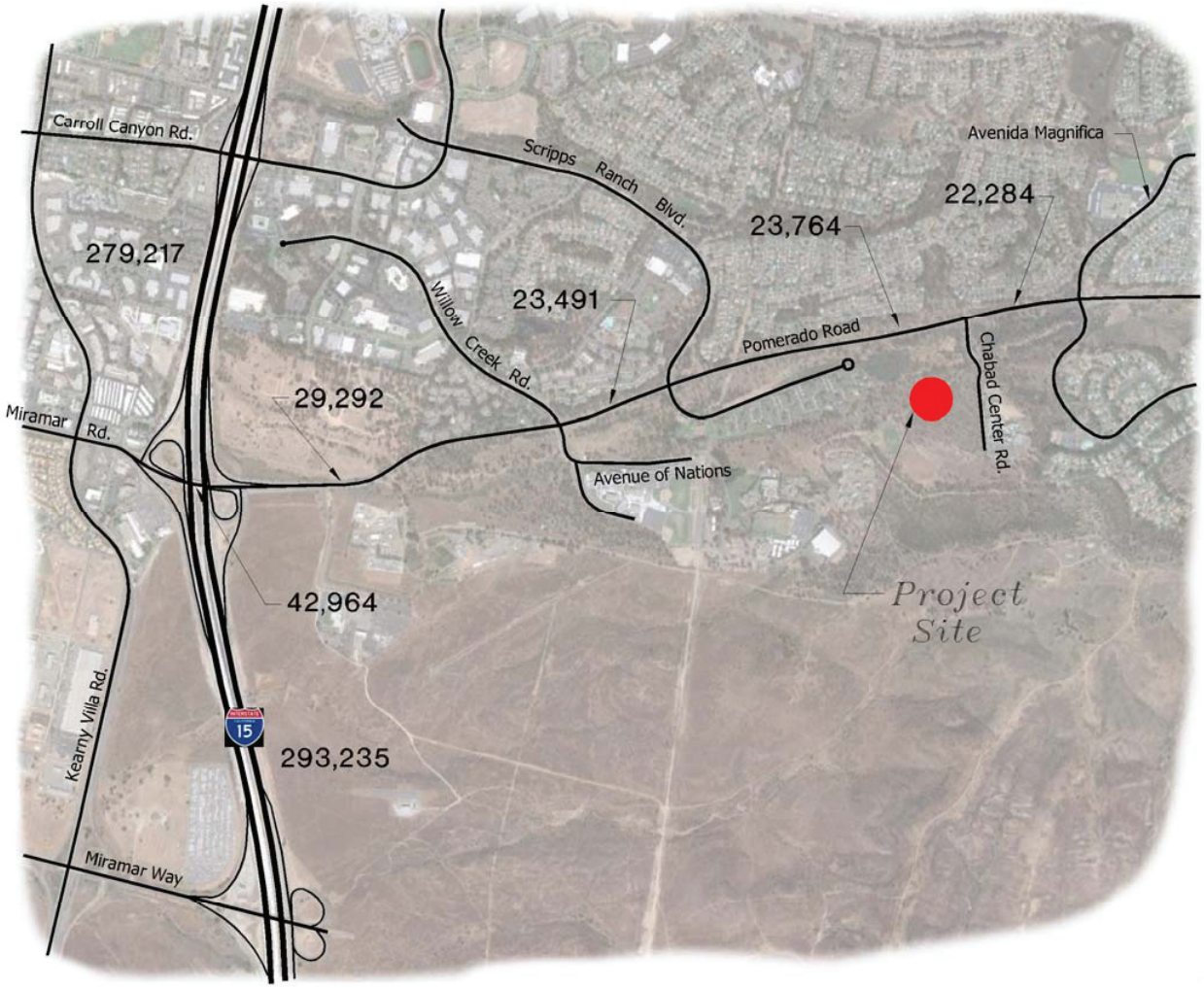
Table 4.2-10 shows the Near-term With Project intersection LOS. As shown, only the intersection of Pomerado Road and Willow Creek Road would operate at an unacceptable LOS.

TABLE 4.2-10
NEAR-TERM WITH PROJECT INTERSECTION LEVELS OF SERVICE

No.	Intersection	Control	AM Peak Hour		PM Peak Hour	
			Delay	LOS	Delay	LOS
1	Miramar Road/I-15 SB Ramps	Signalized	27.4	C	14.7	B
2	Miramar Road/I-15 NB Ramps	Signalized	16.4	B	14.6	B
3	Pomerado Road/Willow Creek Road	Signalized	94.0	**F**	70.1	**E**
4	Pomerado Road/Scripps Ranch Blvd.	Signalized	49.8	D	30.0	C
5	Chabad Center Driveway	Signalized	15.5	B	13.6	B
6	Pomerado Road/Avenida Magnifica	Signalized	40.4	D	38.0	D

BOLD = Unacceptable LOS

Map Source: Urban Systems Associates, Inc., 2013



Not to Scale

FIGURE 4.2-8

Near-term with Project Average Daily Traffic

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c. Year 2030 (Cumulative) Condition Impacts

Year 2030 Without Project volumes were taken from the Series 11 Regional Travel Forecast prepared by SANDAG. The project traffic was then added to the Year 2030 Without Project traffic volumes to get Year 2030 With Project traffic volumes. The SANDAG Series 11 regional traffic forecast model is based on planning efforts involving all jurisdictions within the County of San Diego. SANDAG, as the regional planning agency, collects data from these plans and collates this data within a traffic model. SANDAG also prepared the regional transportation plan (RTP) utilized by the traffic model as a basis for estimating future traffic. The project would generate 1,880 ADT. This is less than the traffic already accounted for in the regional forecast. Therefore, the Year 2030 Without Project segment volumes used in this analysis are conservatively high.

Year 2030 Without Project

Street Segments

Figure 4.2-9 shows the daily traffic volumes in Year 2030 Without Project condition. Table 4.2-11 shows the Year 2030 Without Project street segment levels of service. As shown, all analyzed segments of Pomerado Road are projected to operate at an unacceptable LOS in the Year 2030 Without Project condition. Miramar Road between I-15 southbound ramps and I-15 northbound ramps would operate at an acceptable LOS C.

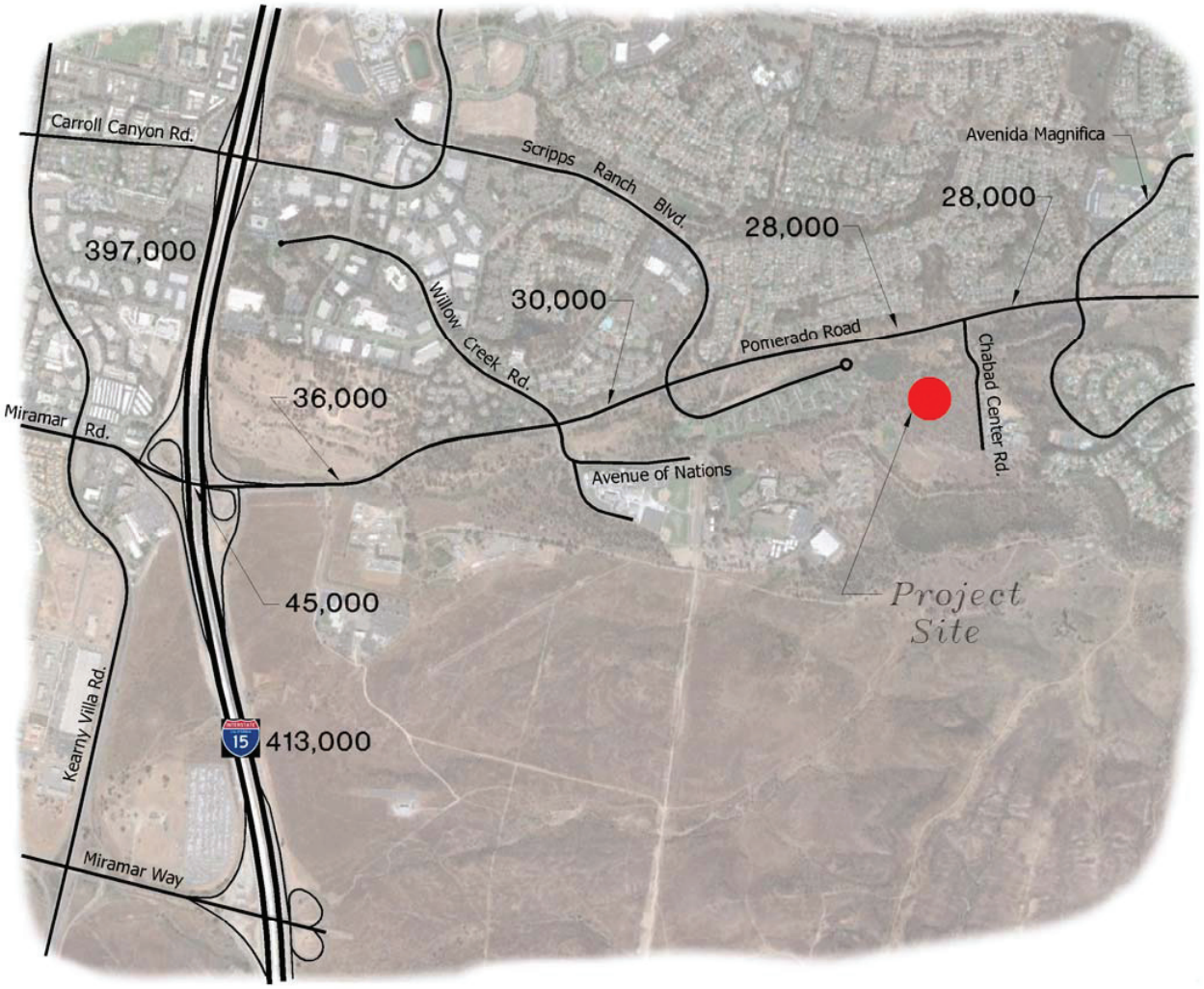
TABLE 4.2-11
YEAR 2030 WITHOUT PROJECT STREET SEGMENT LEVELS OF SERVICE

Road	Segment	Jurisd.	Class.	Cap.	Volume	V/C	LOS
Miramar Road	I-15 SB Ramps to I-15 NB Ramps	SD	PA	60,000	45,000	0.75	C
Pomerado Road	I-15 NB Ramps to Willow Creek Road	SD	2-Ca	15,000	36,000	2.40	**F**
	Willow Creek Road to Scripps Ranch Boulevard	SD	2-Ca	15,000	30,000	2.00	**F**
	Scripps Ranch Boulevard to Chabad Center Driveway	SD	2-Ca	15,000	28,000	1.87	**F**
	Chabad Center Driveway to Avenida Magnifica	SD	2-Ca	15,000	28,000	1.87	**F**

BOLD = Unacceptable LOS

Legend:
Jurisd. = Jurisdiction
SD = San Diego
Class. = Functional Class
Cap. = Capacity
LOS = Level of Service
PA = 6-lane Prime Arterial
2-Ca = 2-lane Collector with painted median/turn lane

Map Source: Urban Systems Associates, Inc., 2013



Not to Scale

FIGURE 4.2-9

Year 2030 without Project Average Daily Traffic

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Intersections

Table 4.2-12 shows the Year 2030 Without Project intersection LOS. As shown, the following three intersections are projected to operate at unacceptable levels of service:

- Pomerado Road at Willow Creek Road – AM LOS F, PM LOS F.
- Pomerado Road at Scripps Ranch Boulevard – AM LOS F, PM LOS F.
- Pomerado Road at Avenida Magnifica – AM LOS F, PM LOS F.

TABLE 4.2-12
YEAR 2030 WITHOUT PROJECT INTERSECTION LEVELS OF SERVICE

No.	Intersection	Control	AM Peak Hour		PM Peak Hour	
			Delay	LOS	Delay	LOS
1	Miramar Road/I-15 SB Ramps	Signalized	26.3	C	48.7	D
2	Miramar Road/I-15 NB Ramps	Signalized	16.6	B	13.9	B
3	Pomerado Road/Willow Creek Road	Signalized	167.5	**F**	165.8	**F**
4	Pomerado Road/Scripps Ranch Boulevard	Signalized	136.5	**F**	82.9	**F**
5	Chabad Center Driveway	Signalized	19.2	B	28.5	C
6	Pomerado Road/Avenida Magnifica	Signalized	99.5	**F**	83.6	**F**

BOLD = Unacceptable LOS

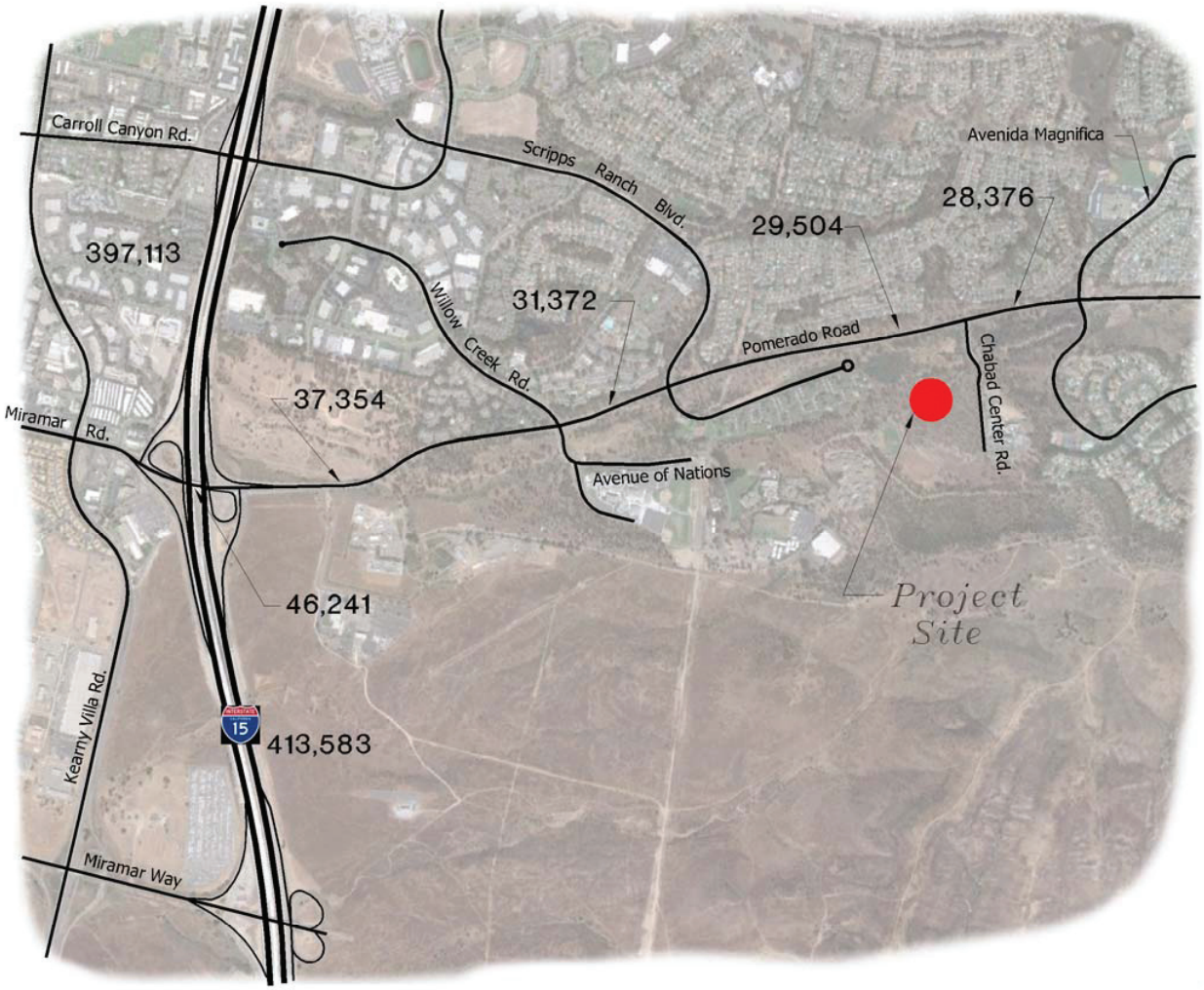
Year 2030 With Project

The following provides an analysis of impacts that would result when the traffic from the project is added to the Year 2030 condition.

Street Segments

Figure 4.2-10 shows the daily traffic volumes in Year 2030 With Project condition. Table 4.2-13 shows the Year 2030 With Project street segment LOS. As shown, all analyzed segments of Pomerado Road are projected to operate at an unacceptable LOS in the Year 2030 With Project condition. Miramar Road between I-15 southbound ramps and I-15 northbound ramps would operate at an acceptable LOS C.

Map Source: Urban Systems Associates, Inc., 2013



Not to Scale

FIGURE 4.2-10

Year 2030 with Project Average Daily Traffic

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TABLE 4.2-13
YEAR 2030 WITH PROJECT STREET SEGMENT LEVELS OF SERVICE

Road	Segment	Jurisd.	Class.	Cap.	Volume	V/C	LOS
Miramar Road	I-15 SB Ramps to I-15 NB Ramps	SD	PA	60,000	46,241	0.77	C
Pomerado Road	I-15 NB Ramps to Willow Creek Road	SD	2-Ca	15,000	37,354	2.49	**F**
	Willow Creek Road to Scripps Ranch Boulevard	SD	2-Ca	15,000	31,372	2.09	**F**
	Scripps Ranch Boulevard to Chabad Center Driveway	SD	2-Ca	15,000	29,504	1.97	**F**
	Chabad Center Driveway to Avenida Magnifica	SD	2-Ca	15,000	28,376	1.89	**F**

BOLD = Unacceptable LOS

Legend:
Jurisd. = Jurisdiction
SD = San Diego
Class. = Functional Class
Cap. = Capacity
LOS = Level of Service
PA = 6-lane Prime Arterial
2-Ca = 2-lane Collector with painted median/turn lane

Intersections

Table 4.2-14 shows the Year 2030 With Project intersection LOS. As shown, the following three intersections are projected to operate at unacceptable LOS:

- Pomerado Road at Willow Creek Road – AM LOS F, PM LOS F.
- Pomerado Road at Scripps Ranch Boulevard – AM LOS F, PM LOS F.
- Pomerado Road at Avenida Magnifica – AM LOS F, PM LOS F.

TABLE 4.2-14
YEAR 2030 WITH PROJECT INTERSECTION LEVELS OF SERVICE

No.	Intersection	Control	AM Peak Hour		PM Peak Hour	
			Delay	LOS	Delay	LOS
1	Miramar Road/I-15 SB Ramps	Signalized	27.0	C	48.8	D
2	Miramar Road/I-15 NB Ramps	Signalized	17.2	B	13.9	B
3	Pomerado Road/Willow Creek Road	Signalized	181.5	**F**	189.9	**F**
4	Pomerado Road/Scripps Ranch Boulevard	Signalized	160.7	**F**	105.0	**F**
5	Chabad Center Driveway	Signalized	33.3	C	39.0	D
6	Pomerado Road/Avenida Magnifica	Signalized	100.3	**F**	83.9	**F**

BOLD = Unacceptable LOS

4.2.3.2 Significance of Impacts

a. Direct Impacts

Street Segments

Table 4.2-15 shows the summary of the existing direct impacts with and without the project for street segments within the study area. Table 4.2-16 shows the summary of the near-term direct impacts with and without the project for street segments within the study area. As shown in both tables, significant direct impacts would occur at the following four locations:

- Pomerado Road between I-15 northbound ramps and Willow Creek Road.
- Pomerado Road between Willow Creek Road and Scripps Ranch Boulevard.
- Pomerado Road between Scripps Ranch Boulevard and Chabad Center Driveway.
- Pomerado Road between Chabad Center Driveway and Avenida Magnifica.
- Miramar Road between I-15 southbound ramps and I-15 northbound ramps would operate at an acceptable LOS C. Direct impacts to Miramar Road would be less than significant.

Intersections

Table 4.2-17 shows the summary of the existing direct impacts with and without the project for intersections within the study area. Table 4.2-18 shows the summary of the near-term direct impacts with and without the project for intersections within the study area. As shown in both tables, significant direct impacts would occur at one location:

- Pomerado Road and Willow Creek Road.

TABLE 4.2-15
EXISTING WITH AND WITHOUT PROJECT STREET SEGMENT OPERATIONS

Road	Segment	Class.	Existing			Existing + Project			ΔV/C	*Sig. Impact?*
			LOS	Volume	V/C	LOS	Volume	V/C		
Miramar Road	I-15 SB Ramps to I-15 NB Ramps	PA	C	41,208	0.69	C	42,449	0.71	0.021	*NO*
Pomerado Road	I-15 NB Ramps to Willow Creek Road	2-Ca	F	27,827	1.86	F	29,181	1.95	**0.090**	***YES***
	Willow Creek Road to Scripps Ranch Boulevard	2-Ca	F	22,038	1.47	F	23,410	1.56	**0.091**	***YES***
	Scripps Ranch Boulevard to Chabad Center Driveway	2-Ca	F	22,199	1.48	F	23,703	1.58	**0.100**	***YES***
	Chabad Center Driveway to Avenida Magnifica	2-Ca	F	21,847	1.46	F	22,223	1.48	**0.025**	***YES***

Legend:
Class. = Functional Class
LOS = Level of Service
V/C = Volume to Capacity Ratio
ΔV/C = Change in V/C Ratio
PA = 6-lane Prime Arterial
2-Ca = 2-lane Collector with painted median/turn lane

TABLE 4.2-16
NEAR-TERM WITH AND WITHOUT PROJECT STREET SEGMENT OPERATIONS

Road	Segment	Class.	Near-term			Near-term + Project			ΔV/C	*Sig. Impact?*
			LOS	Volume	V/C	LOS	Volume	V/C		
Miramar Road	I-15 SB Ramps to I-15 NB Ramps	PA	C	41,723	0.70	C	42,964	0.72	0.021	*NO*
Pomerado Road	I-15 NB Ramps to Willow Creek Road	2-Ca	F	27,938	1.86	F	29,292	1.95	**0.090**	***YES***
	Willow Creek Road to Scripps Ranch Boulevard	2-Ca	F	22,119	1.47	F	23,491	1.57	**0.091**	***YES***
	Scripps Ranch Boulevard to Chabad Center Driveway	2-Ca	F	22,260	1.48	F	23,764	1.58	**0.100**	***YES***
	Chabad Center Driveway to Avenida Magnifica	2-Ca	F	21,908	1.46	F	22,284	1.49	**0.025**	***YES***

Legend:
Class. = Functional Class
LOS = Level of Service
V/C = Volume to Capacity Ratio
ΔV/C = Change in V/C Ratio
PA = 6-lane Prime Arterial
2-Ca = 2-lane Collector with painted median/turn lane

TABLE 4.2-17
EXISTING WITH AND WITHOUT PROJECT INTERSECTION OPERATIONS

		Existing				Existing + Project							
		AM Peak Hour		PM Peak Hour		AM Peak Hour				PM Peak Hour			
Number	Intersection	D	LOS	D	LOS	D	LOS	Δ	*S?*	D	LOS	Δ	*S?*
1	Miramar Road/I-15 SB Ramps	25.7	C	13.5	B	26.6	C	0.9	*NO*	13.9	B	0.4	*NO*
2	Miramar Road/I-15 NB Ramps	15.8	B	14.2	B	16.0	B	0.2	*NO*	14.4	B	0.2	*NO*
3	Pomerado Road/Willow Creek Road	82.0	F	58.2	E	93.2	F	11.2	***YES***	68.4	E	10.2	***YES***
4	Pomerado Road/Scripps Ranch Boulevard	39.4	D	26.3	C	50.0	D	10.6	*NO*	29.9	C	3.6	*NO*
5	Chabad Center Driveway	11.0	B	10.1	B	15.5	B	4.5	*NO*	13.6	B	3.5	*NO*
6	Pomerado Road/Avenida Magnifica	39.4	D	36.4	D	40.4	D	1.0	*NO*	38.0	D	1.6	*NO*

Legend:
LOS = Level of Service
Δ = Change
S = Significant
D = Delay

TABLE 4.2-18
NEAR-TERM WITH AND WITHOUT PROJECT INTERSECTION OPERATIONS

		Near-term				Near-term + Project							
		AM Peak Hour		PM Peak Hour		AM Peak Hour				PM Peak Hour			
Number	Intersection	D	LOS	D	LOS	D	LOS	Δ	*S?*	D	LOS	Δ	*S?*
1	Miramar Road/I-15 SB Ramps	26.1	C	14.3	B	27.4	C	1.3	*NO*	14.7	B	0.4	*NO*
2	Miramar Road/I-15 NB Ramps	16.2	B	14.2	B	16.4	B	0.2	*NO*	14.6	B	0.4	*NO*
3	Pomerado Road/Willow Creek Road	82.6	F	59.1	E	94.0	F	11.4	***YES***	70.1	E	11.0	***YES***
4	Pomerado Road/Scripps Ranch Boulevard	39.4	D	26.4	C	49.8	D	10.4	*NO*	30.0	C	3.6	*NO*
5	Chabad Center Driveway	11.0	B	10.1	B	15.5	B	4.5	*NO*	13.6	B	3.5	*NO*
6	Pomerado Road/Avenida Magnifica	39.4	D	36.4	D	40.4	D	1.0	*NO*	38.0	D	1.6	*NO*

Legend:
LOS = Level of Service
Δ = Change
S = Significant
D = Delay

b. Year 2030 (Cumulative) Impacts

Street Segments

Table 4.2-19 shows the summary of the Year 2030 cumulative impacts with and without the project for street segments within the study area. As shown, significant cumulative traffic impacts would occur at the following four locations:

- Pomerado Road between I-15 northbound ramps and Willow Creek Road.
- Pomerado Road between Willow Creek Road and Scripps Ranch Boulevard.
- Pomerado Road between Scripps Ranch Boulevard and Chabad Center Driveway.
- Pomerado Road between Chabad Center Driveway and Avenida Magnifica

Miramar Road between I-15 southbound ramps and I-15 northbound ramps would operate at an acceptable LOS C. Direct impacts to Miramar Road would be less than significant.

Intersections

Table 4.2-20 shows the summary of the Year 2030 cumulative impacts with and without the project for intersections within the study area. As shown, significant cumulative impacts would at two locations:

- Pomerado Road and Willow Creek Road.
- Pomerado Road and Scripps Ranch Boulevard.

4.2.3.3 Mitigation, Monitoring, and Reporting

Typically, mitigation measures for direct and cumulative impacts are determined based on the analysis of LOS and on significance criteria. As noted in the preceding sections, both direct and cumulative impacts were identified. As detailed in the TIA, an additional eastbound and westbound through lane provided on Pomerado Road would mitigate direct and cumulative impacts to street segments and intersections to an acceptable LOS.

The Scripps Miramar Ranch Planning Board determined that they did not want to widen Pomerado Road east of Scripps Ranch Boulevard to four lanes, and the widening was deleted from the SMRCP on October 26, 1993, Resolution R-282903. The four-lane major street widening of Pomerado Road adjacent to the project area was also deleted from the former Pomerado Road Widening CIP programming sheet. More specifically, the Community Plan was amended to describe the process and vote required to consider the widening of Pomerado Road. Based on the action by a previous City Council, in approving the 1993 Resolution R-282903, although the project would result in both direct and cumulative street segment and

TABLE 4.2-19
YEAR 2030 WITH AND WITHOUT PROJECT STREET SEGMENT OPERATIONS

Road	Segment	Class.	Year 2030			Year 2030 + Project			ΔV/C	*Sig. Impact?*
			LOS	Volume	V/C	LOS	Volume	V/C		
Miramar Road	I-15 SB Ramps to I-15 NB Ramps	PA	C	45,000	0.75	C	46,241	0.77	0.021	*NO*
Pomerado Road	I-15 NB Ramps to Willow Creek Road	2-Ca	F	36,000	2.40	F	37,354	2.49	**0.090**	***YES***
	Willow Creek Road to Scripps Ranch Boulevard	2-Ca	F	30,000	2.00	F	31,372	2.09	**0.091**	***YES***
	Scripps Ranch Boulevard to Chabad Center Driveway	2-Ca	F	28,000	1.87	F	29,504	1.97	**0.100**	***YES***
	Chabad Center Driveway to Avenida Magnifica	2-Ca	F	28,000	1.87	F	28,376	1.89	**0.025**	***YES***

Legend:
Class. = Functional Class
LOS = Level of Service
V/C = Volume to Capacity Ratio
ΔV/C = Change in V/C Ratio
PA = 6-lane Prime Arterial
2-Ca = 2-lane Collector with painted median/turn lane

TABLE 4.2-20
YEAR 2030 WITHOUT AND WITH PROJECT INTERSECTION OPERATIONS

Number	Intersection	Year 2030				Year 2030 + Project							
		AM Peak Hour		PM Peak Hour		AM Peak Hour				PM Peak Hour			
		D	LOS	D	LOS	D	LOS	Δ	*S?*	D	LOS	Δ	*S?*
1	Miramar Road/I-15 SB Ramps	26.3	C	48.7	D	27.0	C	0.7	*NO*	48.8	D	0.1	*NO*
2	Miramar Road/I-15 NB Ramps	16.6	B	13.9	B	17.2	B	0.6	*NO*	13.9	B	0.0	*NO*
3	Pomerado Road/Willow Creek Road	167.5	F	165.8	F	181.5	F	14.0	***YES***	189.9	F	24.1	***YES***
4	Pomerado Road/Scripps Ranch Boulevard	136.5	F	82.9	F	160.7	F	24.2	***YES***	105.0	F	22.1	***YES***
5	Chabad Center Driveway	19.2	B	28.5	C	33.3	C	14.1	*NO*	39.0	D	10.5	*NO*
6	Pomerado Road/Avenida Magnifica	99.5	F	83.6	F	100.3	F	0.8	*NO*	83.9	F	0.3	*NO*

Legend:
LOS = Level of Service
Δ = Change
S = Significant?
D = Delay

intersection impacts, mitigation is not considered feasible given the City Council and SMRCP action.

4.2.3.4 Significance of Impacts after Mitigation

Since Pomerado Road is not proposed to be widened to four lanes for the reasons described above, there are no feasible mitigation measures to reduce significant direct and cumulative impacts. Impacts would therefore remain significant and unmitigated.

4.2.4 Issue 2: Traffic Generation

Would the project result in traffic generation in excess of specific community plan allocations?

4.2.4.1 Impacts

The project site is within an area designated for University use in the SMRCP, and is zoned as RS-1-8 (Residential—Single Unit). The Planning Commission identified the project as most like a Residential Care Facility, which is permitted in the RS-1-8 zone with a CUP for Alliant International University. The project would amend the existing CUP to allow for the project, and would redesignate the site from University to Institutional use.

As shown in Table 4.2-4, the project would generate a total of 1,880 new ADTs, with 144 trips occurring in the AM peak hour and 181 trips occurring in the PM peak hour. This is less than the university traffic already within the regional transportation model for this portion of the SMRCP area. Therefore, the project would not result in traffic generation in excess of specific community plan allocations.

4.2.4.2 Significance of Impacts

Due to the proposed change in use from University to CCRC, the project would not result in traffic generation in excess of specific community plan allocations. Impacts would be less than significant.

4.2.4.3 Mitigation, Monitoring, and Reporting

Impacts would be less than significant. No mitigation is required.

4.2.5 Issue 3: Freeways, Interchanges, and Ramps

Would the project result in the addition of a substantial amount of traffic to a congested freeway segment, interchange, or ramp?

4.2.5.1 Impacts

a. Freeway Analysis

Freeway segments are analyzed where the project would add 50 or more peak hour directional trips. One segment south and one segment north on I-15 were evaluated for this analysis. The project would contribute less than 50 peak hour directional trips to all other freeway segments. Tables 4.2-21 through 4.2-23 summarize the freeway analysis results for the Existing, Near-term, and Year 2030 conditions.

A significant impact to the freeway would result if the volume to capacity ratio changed by more than 0.010 and the freeway LOS is E, or by more than 0.005 and the freeway LOS is F (see Table 4.2-3). As can be seen, all analyzed freeway segments would operate at acceptable LOS C or D under the Existing Without Project and With Project conditions and the Near-term Without Project and With Project conditions. Under the Year 2030 With and Without Project conditions, the following two mainlines would operate at unacceptable LOS:

- I-15 Northbound between Miramar Way and Miramar Road – LOS E.
- I-15 Northbound between Miramar Road and Carroll Canyon Road – LOS E.

However, the project would cause volume-to-capacity ratios less than 0.010, and impacts would be less than significant.

b. Ramp Meter Analysis

Metered freeway on-ramps have been evaluated at Miramar Road and the I-15 ramps. The Existing, Existing Without and With Project, Near-term Without and With Project, and Year 2030 Without and With Project scenarios have been analyzed and are shown on Tables 4.2-24 through 4.2-26. In each condition, the meter rate is based on the most restrictive meter rate provided by Caltrans. As shown in the tables, some of the ramp meters are reporting zero delay and zero queue based on the Most Restrictive Meter Rate calculations. This is because the demand is lower than the most restrictive meter rate, which equals no excess demand. Therefore, no delay or queue is calculated.

TABLE 4.2-21
EXISTING WITH AND WITHOUT PROJECT FREEWAY OPERATIONS

Segment	Lanes	Dir.	Capacity	Peak Hour %	Dir. Split	Existing			Existing + Project			Δ	S?
						ADT	V/C	LOS	ADT	V/C	LOS		
I-15													
Miramar Way/Miramar Road	6-GP+2-M	NB	17,460	0.083	0.62	290,000	0.858	D	290,583	0.860	D	0.002	NO
Miramar Way/Miramar Road	6-GP+2-M	SB	17,460	0.082	0.57	290,000	0.780	C	290,583	0.782	C	0.002	NO
Miramar Road/Carroll Canyon Road	6-GP+2-M	NB	17,460	0.083	0.62	273,000	0.808	D	273,113	0.808	D	0.00	NO
Miramar Road/Carroll Canyon Road	6-GP+2-M	SB	17,460	0.082	0.57	273,000	0.735	C	273,113	0.735	C	0.00	NO

TABLE 4.2-22
NEAR-TERM WITH AND WITHOUT PROJECT FREEWAY OPERATIONS

Segment	Lanes	Dir.	Capacity	Peak Hour %	Dir. Split	Near-Term			Near-Term + Project			Δ	S?
						ADT	V/C	LOS	ADT	V/C	LOS		
I-15													
Miramar Way/Miramar Road	6-GP+2-M	NB	17,460	0.083	0.62	292,652	0.866	D	293,235	0.867	D	0.002	NO
Miramar Way/Miramar Road	6-GP+2-M	SB	17,460	0.082	0.57	292,652	0.788	C	293,235	0.789	C	0.002	NO
Miramar Road/Carroll Canyon Road	6-GP+2-M	NB	17,460	0.083	0.62	279,104	0.826	D	279,217	0.826	D	0.00	NO
Miramar Road/Carroll Canyon Road	6-GP+2-M	SB	17,460	0.082	0.57	279,104	0.751	C	279,217	0.751	C	0.00	NO

TABLE 4.2-23
YEAR 2030 WITH AND WITHOUT PROJECT FREEWAY OPERATIONS

Segment	Lanes	Dir.	Capacity	Peak Hour %	Dir. Split	Year 2030			Year 2030 + Project			Δ	S?
						ADT	V/C	LOS	ADT	V/C	LOS		
I-15													
Miramar Way/Miramar Road	7-GP+2-M	NB	23,170	0.083	0.62	413,000	0.921	E	413,583	0.922	E	0.001	NO
Miramar Way/Miramar Road	7-GP+2-M	SB	23,170	0.082	0.57	413,000	0.838	D	413,583	0.839	D	0.001	NO
Miramar Road/Carroll Canyon Road	6-GP+2-M	NB	20,820	0.083	0.62	397,000	0.985	E	397,113	0.985	E	0.000	NO
Miramar Road/Carroll Canyon Road	7-GP+2-M	SB	23,170	0.082	0.57	397,000	0.805	D	397,113	0.805	D	0.000	NO

Legend:
Dir. = Direction
ADT = Average Daily Traffic
V/C = Volume to Capacity Ratio
LOS = Level of Service
S = Significant
#-GP = # of General Purpose Lanes
#-M = # of Managed Lanes

Note:
Capacity for LOS "E" roadway is 2,350 passenger cars per hour per lane (pc/hr/ln) for 65 mph taken from 2000 Highway Capacity Manual
A = Auxiliary lane with LOS "E" capacity of 1,800 pc/hr/ln.
Peak Hour % and Dir. Split taken from Caltrans internet posted Traffic Volumes.

TABLE 4.2-24
EXISTING WITH AND WITHOUT PROJECT FREEWAY RAMP OPERATIONS

Location		Existing		Existing + Project		Freeway LOS	Δ	S?
		Delay (min.)	Queue (Ft.)	Delay (min.)	Queue (Ft.)			
Pomerado Road/I-15 SB on Ramp (Westbound) - Loop	AM	0.00	0	0.00	0	C	0.00	NO
	PM	0.00	0	0.00	0	C	0.00	NO
Pomerado Road/I-15 NB on Ramp (Westbound)	AM	Ramp meter is not turned on in this peak.						
	PM	0.00	0	0.00	0	D	0.00	NO
Miramar Road/I-15 SB on Ramp (Eastbound)	AM	0.00	0	0.00	0	C	0.00	NO
	PM	13.09	3,538	13.09	3,538	C	0.00	NO
Miramar Road/I-15 NB on Ramp (Eastbound) - Loop	AM	Ramp meter is not turned on in this peak.						
	PM	23.32	5,162	23.32	5,162	D	0.00	NO

TABLE 4.2-25
NEAR-TERM WITH AND WITHOUT PROJECT FREEWAY RAMP OPERATIONS

Location		Near-term		Near-term + Project		Freeway LOS	Δ	S?
		Delay (min.)	Queue (Ft.)	Delay (min.)	Queue (Ft.)			
Pomerado Road/I-15 SB on Ramp (Westbound) - Loop	AM	0.00	0	0.00	0	C	0.00	NO
	PM	0.00	0	0.00	0	C	0.00	NO
Pomerado Road/I-15 NB on Ramp (Westbound)	AM	Ramp meter is not turned on in this peak.						
	PM	0.00	0	0.00	0	D	0.00	NO
Miramar Road/I-15 SB on Ramp (Eastbound)	AM	0.00	0	0.00	0	C	0.00	NO
	PM	14.49	3,915	14.49	3,915	C	0.00	NO
Miramar Road/I-15 NB on Ramp (Eastbound) - Loop	AM	Ramp meter is not turned on in this peak.						
	PM	23.32	5,162	23.32	5,162	D	0.00	NO

TABLE 4.2-26
YEAR 2030 WITH AND WITHOUT PROJECT FREEWAY RAMP OPERATIONS

Location		Year 2030		Year 2030 + Project		Freeway LOS	Δ	S?
		Delay (min.)	Queue (Ft.)	Delay (min.)	Queue (Ft.)			
Pomerado Road/I-15 SB on Ramp (Westbound) - Loop	AM	0.00	0	0.00	0	D	0.00	NO
	PM	0.00	0	0.00	0	D	0.00	NO
Pomerado Road/I-15 NB on Ramp (Westbound)	AM	Ramp meter is not turned on in this peak.						
	PM	0.00	0	0.00	0	E	0.00	NO
Miramar Road/I-15 SB on Ramp (Eastbound)	AM	0.00	0	0.00	0	D	0.00	NO
	PM	26.89	7,265	26.89	7,265	D	0.00	NO
Miramar Road/I-15 NB on Ramp (Eastbound) - Loop	AM	Ramp meter is not turned on in this peak.						
	PM	23.32	5,162	23.32	5,162	E	0.00	NO

Notes:
Δ = Change in delay (minutes)
S = Significant, if change in delay is greater than 2 minutes and freeway LOS E and ramp delay is 15 minutes or more;
Significant, if change in delay is greater than 1 minutes and freeway LOS F and ramp delay is 15 minutes or more

4.2.5.2 Significance of Impacts

a. Freeway Analysis

I-15 would operate at acceptable levels under the Existing and Near-term Without and With Project conditions, and there would be no significant direct impacts as a result of the project. I-15 would operate at unacceptable LOS E under the Year 2030 With and Without the Project; however, the project would cause less than the threshold of 0.010 change in the volume to capacity ratio. Thus, direct and cumulative project impacts would be less than significant.

b. Ramp Meter Analysis

The project would not result in an increase in delay at the analyzed ramps. Thus, direct and cumulative project impacts would be less than significant.

4.2.5.3 Mitigation, Monitoring, and Reporting

Impacts would be less than significant. No mitigation is required.

4.2.6 Issue 4: Transportation Systems

Would the project result in a substantial impact upon existing or planned transportation systems?

4.2.6.1 Impacts

Pomerado Road and Chabad Center Driveway would serve as access to the project site. Pedestrian walkways would be incorporated into the project design to provide connections between on-site and off-site uses. The nearest MTS bus stop is at Willow Creek Road and Aviary Drive, approximately one mile from the project site. Within the project area, Pomerado Road and Miramar Road include Class II bicycle lanes.

As discussed above, peak hour traffic volumes due to the project would be less than other projects. This is because the staff work shift hours would be outside of normal peak commuting hours; residents would be seniors, many of which would not drive; and both residents and visitors would prefer to avoid peak traffic hours because they are uncomfortable with congestion, or have the time and resources to travel during non-peak times. Additionally, the project would provide its own bus, car, and van shuttles for shopping, doctor visits, and outings for the residents. Because of these factors, the project would not significantly impact any existing or planned transportation systems.

4.2.6.2 Significance of Impacts

The project would not result in a substantial impact upon existing or planned transportation systems because residents and staff would likely travel during non-peak hours and the project would provide bus and shuttle services.

4.2.6.3 Mitigation, Monitoring, and Reporting

Impacts would be less than significant. No mitigation is required.

4.2.7 Issue 5: Traffic Hazards

Would the project increase traffic hazards for motor vehicles, bicyclists, or pedestrians due to a proposed non-standard design features (e.g., poor sight distance or driveway onto an access-restricted roadway)?

4.2.7.1 Impacts

Project access is proposed at Chabad Center Driveway from Pomerado Road. There is a traffic signal at the intersection of Pomerado Road and Chabad Center Driveway. Future AM/PM peak hour traffic volumes were calculated in the TIA. It was calculated that the expected future LOS at the intersection of Pomerado Road and Chabad Center Driveway would be LOS D.

The project would provide an internal pedestrian system and pedestrian linkages to Pomerado Road. The project would not interfere with the corridor along Pomerado Road that allows for pedestrian, bicycle, and equestrian use adjacent Carroll Canyon Creek.

Emergency access is addressed in Section 4.8.5, Health and Safety/Hazardous Materials. As indicated in that section, roadways and a fire lane would be constructed per the City Fire Marshal's Standards and would provide adequate site access. This includes 26-foot-wide unobstructed requirements. All dead-end roadways would include adequate turnarounds for fire engines at the terminus and mid-point. These design features would ensure that traffic hazards to motor vehicles, bicycles, and pedestrians would be less than significant.

4.2.7.2 Significance of Impacts

The project would not result in a significant impact to traffic hazards and emergency access.

4.2.7.3 Mitigation, Monitoring, and Reporting

Impacts would be less than significant. No mitigation is required.

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4.3 Biological Resources

General and focused biological surveys (pursuant to the City's 2012 Biology Guidelines) were conducted in July 2012 to assess the current condition of the biological resources on-site. Protocol surveys were conducted for Quino checkerspot butterfly (*Euphydras editha quino*) and San Diego fairy shrimp (*Branchinecta sandiegonensis*) to determine presence/absence of those species between September 2012 and April 2013 (RECON 2012, 2013a, 2013b). A comprehensive wetland delineation of the site was conducted in August 2012 (RECON 2015a). A biological technical report summarizing the findings of these surveys was prepared in 2015. The findings of the biological technical report are summarized below, and the report is included as Appendix E to this EIR.

4.3.1 Existing Conditions

4.3.1.1 Existing Vegetation Communities and Land Cover Types

As listed in Table 4.3-1, 10 vegetation/land cover types occur within the 53.38-acre project area: disturbed Diegan coastal sage scrub, southern mixed chaparral, disturbed southern mixed chaparral, disturbed non-native grassland, disturbed land, eucalyptus woodland, developed land, and riparian scrub (Figure 4.3-1). A total of 117 plant species were identified on the site (see Attachment 1 of Appendix E). Of these 117 species, 69 are considered native to California and 48 are considered non-native species.

TABLE 4.3-1
EXISTING VEGETATION COMMUNITIES/LAND COVER TYPES IN SURVEY AREA

Vegetation Communities/ Land Cover Types	MSCP Tier	Project Site	Off-Site Grading	Total Project Area
Disturbed Diegan Coastal Sage Scrub	II	3.08	-	3.08
Southern Mixed Chaparral	III-A	3.15	-	3.15
Disturbed Southern Mixed Chaparral *	III-A	22.56	0.11	22.67
Disturbed Non-native Grassland	III-B	3.21	-	3.21
Disturbed Land	IV	0.56	-	0.56
Eucalyptus Woodland	IV	13.48	0.22	13.70
Developed Land	N/A	6.25	0.05	6.30
Riparian Scrub	-	0.09	-	0.09
Other Features				
Ephemeral Drainages	N/A	0.62	-	0.62
TOTAL	-	**53.00**	**0.38**	**53.38**

*Includes 0.05 acre of seasonal depressions.

a. Disturbed Diegan Coastal Sage Scrub

Disturbed Diegan coastal sage scrub occurs in the northern portion of the project site. Dominant shrub species consist of California buckwheat (*Eriogonum fasciculatum* var. *fasciculatum*), coyote bush (*Baccharis pilularis*), and California sagebrush (*Artemisia californica*). Scattered

non-native shrubs also occur scattered throughout the disturbed Diegan coastal sage scrub and include eucalyptus (*Eucalyptus* sp.) and acacia (*Acacia* sp.). Annual grasses such as rip-gut grass (*Bromus diandrus*) and wild oat (*Avena barbata*) occur within openings in the disturbed Diegan coastal sage scrub. Other species that occur include narrow-leaf milkweed (*Asclepias fascicularis*), Italian thistle (*Carduus pycnocephalus*), and filaree (*Erodium botrys*).

b. Southern Mixed Chaparral

Southern mixed chaparral occurs in the south-eastern portion of the project site. Dominant shrub species consist of mountain mahogany (*Cercocarpus minutiflorus*), coast blue lilac (*Ceanothus tomentosus*), and felt-leaved yerba santa (*Eriodictyon crassifolium*). Several smaller shrub species also occur, such as deerweed (*Acmispon glaber [=Lotus scoparius]*), golden yarrow (*Eriophyllum confertiflorum confertiflorum*), and California buckwheat. Herbs and grasses, including golden tarplant (*Deinandra fasciculata*) and rattail fescue (*Vulpia myuros myuros*), occur within openings in the southern mixed chaparral. Ashy spike-moss (*Selaginella cinerascens*) was observed within this vegetation community. The species composition and burnt stumps suggest that the area burnt in the past.

c. Disturbed Southern Mixed Chaparral

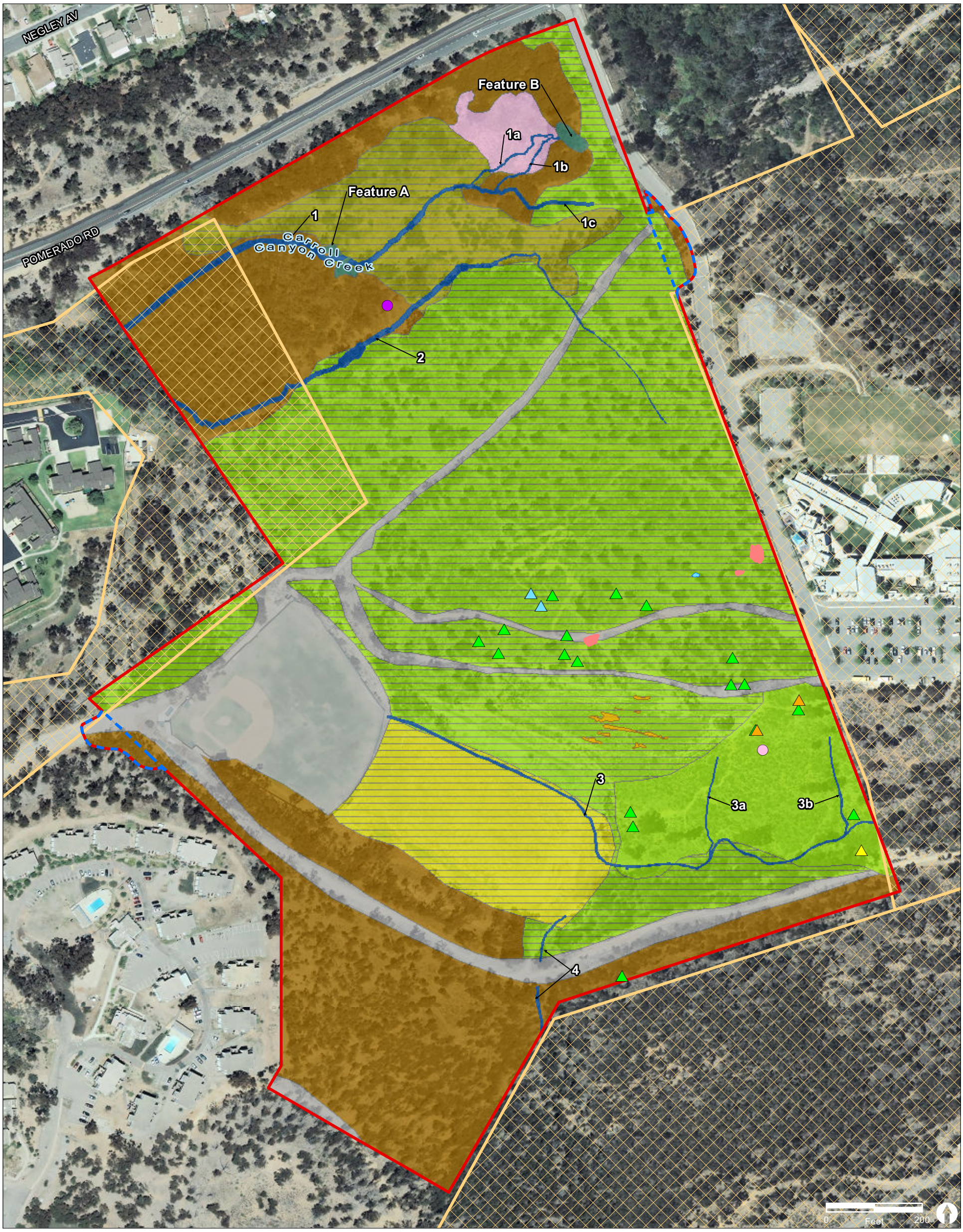
Disturbed southern mixed chaparral occurs throughout the project site. The shrub composition generally matches southern mixed chaparral as discussed above. However, shrub canopy is less dense and continuous, and eucalyptus trees are scattered throughout and in some areas form a partial canopy. There is some herb and grass cover within the openings, typically non-native species such as rattail fescue and purple falsebrome (*Brachypodium distachyon*); however, many areas have accumulations of eucalyptus leaf litter preventing herbaceous growth and inhibiting growth of existing shrubs. Ashy spike-moss, decumbent goldenbush, and western dichondra were observed within this vegetation community.

Surrounded by disturbed southern mixed chaparral, eight low-quality seasonal depressions occur. Within these seasonal depressions, three wetland plant species, annual hairgrass, stone-crop (*Crassula aquatica*), and prairie plantain (*Plantago elongata*), were identified within the ponding areas. Additional plant species also occurring within the ponding areas were toad rush (*Juncus bufonius*), Mariposa rush (*Juncus dubius*), brass-buttons (*Cotula coronopifolia*), and grass poly (*Lythrum hyssopifolia*).

d. Disturbed Non-native Grassland

Disturbed non-native grassland occurs within the southern portion of the project site. The disturbed non-native grassland is dominated by non-native annual grasses such as rip-gut grass, foxtail chess (*Bromus madritensis*), and wild oats (*Avena* sp.). Other non-native species that occur include wild radish (*Raphanus sativus*), Italian thistle, and filaree. Scattered non-native shrubs also occur within and along the edges of the grassland and include eucalyptus

Image source: SanGIS (flown May 2012)



Project Area
Off-Site Grading Improvement Areas
Existing MHPA
Wetland Feature
Drainage Feature
Ephemeral Drainage
Seasonal Depression

Sensitive Plants

Ashy Spike Moss (*Selaginella cinerascens*)
Decumbent Goldenbush (*Isocoma menziesii* var. *decumbens*)
Golden-rayed Pentachaeta (*Pentachaeta aurea*)
San Diego Goldenstar (*Bloomeria clevelandii)*
Western Dichondra (*Dichondra occidentalis*)

Sensitive Wildlife

Cooper's Hawk (*Accipiter cooperii*)
Coastal California Gnatcatcher (*Polioptila californica californica*)

Vegetation Cover and Habitat Type

Southern Mixed Chaparral
Disturbed Southern Mixed Chaparral
Disturbed Coastal Sage Scrub
Disturbed Non-native Grassland
Eucalyptus Woodland
Riparian Scrub
Disturbed
Developed

FIGURE 4.3-1

RECON

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Existing Biological Resources

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and acacia. A few coyote bush and California buckwheat individuals also occur in the disturbed non-native grassland area. These native shrubs are too few and widespread to form native habitat.

e. Disturbed Land

Areas within the project site that are dominated by non-native species other than annual grasses or are devoid of vegetation were classified as disturbed land. The disturbed land on the northern portion of the survey area contains western ragweed (*Ambrosia psilostachya*), wild radish, curly dock (*Rumex crispus*), Italian thistle, bristly ox-tongue (*Helminthotheca echioides*), and Italian wild rye (*Lolium* sp.). Acacia and eucalyptus also occur along the margins of the area. The disturbed land on the western portion of the survey area consists of a dirt area used for parking and lacks vegetation.

f. Eucalyptus Woodland

Eucalyptus woodland, dominated by sugar gum (*Eucalyptus cladocalyx*) with other eucalyptus species intermixed, occurs throughout the project site. The eucalyptus often forms large, dense stands and in most areas dense leaf litter prevents the growth of a significant understory. Everblooming wattle (*Acacia retinodes*) and cootamundra wattle (*Acacia baileyana*) form an understory in the northern portion of the eucalyptus woodland.

g. Developed Land

The access roads and the athletic field within the project site are classified as developed land. These areas have some ornamental landscape plants and ruderal species, but do not contain any native habitat.

h. Riparian Scrub

This vegetation community occurs within the northern section of the parcel, outside of the development footprint in two small patches, and is considered to be an ACOE, CDFW, and City wetland habitat. These patches of vegetation consist of scattered individuals of mule fat (*Baccharis salicifolia*) occurring along Carroll Canyon Creek (see Figure 4.3-1 – Feature A) totaling 0.04 acre, and two arroyo willows (*Salix lasiolepis*) and a red willow (*S. laevigata*) surrounding a man-made culvert totaling 0.05 acre (see Figure 4.3-1 – Feature B). The willows occurring on-site at Feature B have no native understory and are surrounded by acacia and eucalyptus trees. They are growing in a depression made when the riprap energy dissipater was installed (near Feature B) when the road culvert was built. The other patch of riparian scrub at Feature A is growing primarily in the floodplain of the creek. Additionally, these patches at Feature A are separate from one another and are not part of a larger stand of riparian habitat. Features A and B are associated with Carroll Canyon (see Figure 4.3-1).

4.3.1.2 Other Features

Several ephemeral drainages cross through the project boundary from east to west, totaling 0.62 acre. Sections of the northern streambeds range from approximately six to eight feet wide to approximately two to three feet wide. The wider portions of the drainages are composed of cobblestones, and the narrower portions are filled with non-native grasses, such as wild oat, rip-gut grass, and annual beard grass (*Polypogon monspeliensis*). Of the three distinct ephemeral drainages within the project boundary, two occur within the northern section (labeled as drainage feature 1, with sub-branches 1a, 1b, 1c, and drainage feature 2), one in the southern section (labeled as drainage feature 3 with sub-branches 3a and 3b), and one smaller drainage that crosses under a dirt road (labeled as drainage feature 4) (see Figure 4.3-1). The ephemeral drainages do not have hydric soils, wetland hydrology, or wetland vegetation present, nor has wetland vegetation been removed by human disturbance. These drainages are not considered wetlands as they have resulted from seasonal ephemeral flows which have etched through the landscape over time and are not considered wetlands. The ephemeral drainages are discussed further in Section 4.3.1.3.d.

4.3.1.3 Sensitive Vegetation Communities

Sensitive vegetation communities are those communities that are of highly limited distribution. These communities may also support concentrations of sensitive plant or wildlife species. A total of five habitats within the project site are considered sensitive under the City's MSCP Subarea Plan (City of San Diego 1997). These include four upland habitats: disturbed Diegan coastal sage scrub (Tier II habitat), southern mixed chaparral (Tier IIIA habitat), disturbed southern mixed chaparral (Tiers IIIA habitat), disturbed non-native grassland (Tier IIIB habitat); and one wetland habitat: riparian scrub. The sensitive vegetation communities present on-site are shown on Figure 4.3-1 and discussed in further detail below.

a. Disturbed Diegan Coastal Sage Scrub

Diegan coastal sage scrub is considered a sensitive habitat by the City and other regional resource protection agencies. This is due to the scarcity of this vegetation community and the number of sensitive species associated with it. Conservation of Diegan coastal sage scrub habitats is an important planning issue throughout southern California. This vegetation community is a MSCP Tier II habitat.

b. Southern Mixed Chaparral and Disturbed Southern Mixed Chaparral

Southern mixed chaparral and disturbed southern mixed chaparral are considered sensitive habitats by the City and other regional resource protection agencies. This vegetation community is a MSCP Tier II habitat. The low-quality seasonal depressions that occur within the disturbed southern mixed chaparral are not considered sensitive due to their artificial nature.

c. Disturbed Non-native Grassland

Non-native grassland is considered a sensitive habitat by the City and other regional resource protection agencies. Grasslands provide foraging area for many species, and are especially valuable for raptors as hunting grounds. Conservation of grasslands is an important planning issue throughout southern California. Non-native grasslands are classified as MSCP Tier III habitat. Tier III habitat is considered less valuable than native habitat, but still performs many of the same biological functions.

d. Jurisdictional Waters/Wetlands

Jurisdictional locations are shown in Figures 4.3-2a through 4.3-2c and listed in Table 4.3-2. A total of 0.67 acre of ACOE, 0.71 acre of CDFW, 0.71 acre of RWQCB, and 0.09 acre of City jurisdictional waters/wetlands occur within the project area. Results of the delineation are further summarized in the wetland delineation report prepared for the project (RECON 2015a).

Jurisdictional wetlands as defined by the CDFG/RWQCB, and the City of San Diego are present in two locations (labeled Feature A and Feature B in Figures 4.3-2b through 4.3-2c) along the northernmost drainage (labeled 1). The ACOE takes jurisdiction over only the wetland feature at the northwestern edge of the site (labeled Feature B) as all three indicators - hydric soils, wetlands and hydrology - were present only at that location.

The ephemeral drainages are considered ACOE non-wetland waters of the U.S, CDFW streambed, and RWQCB waters of the state. The patch of willows in the northern drainage is considered ACOE wetland, CDFW riparian, and RWQCB waters of the state, and the mule fat patch is considered to be CDFW riparian and RWQCB waters of the state.

TABLE 4.3-2
JURISDICTIONAL WETLANDS/WATERS WITHIN THE SURVEY AREA

Agency	Jurisdictional Wetlands/Waters	Acres
ACOE	Wetland (Riparian Scrub)	0.05
	Non-wetland waters of the U.S.	0.62
	Total ACOE	**0.67**
CDFW*/RWQCB	Wetland (Riparian Scrub)	0.09
	Streambed	0.62
	Total CDFW	**0.71**
City of San Diego	Wetland (Riparian Scrub)	**0.09**

*CDFW area of jurisdiction includes all ACOE jurisdictional waters.

4.3.1.4 Sensitive Plant Species

Five non-listed sensitive plants were detected on-site: San Diego goldenstar (*Bloomeria clevelandii*), ashy spike-moss (*Selaginella cinerascens*), decumbent goldenbush (*Isocoma menziesii* var. *decumbens*), western dichondra (*Dichondra occidentalis*), and golden-rayed pentachaeta (*Pentachaeta aurea*) (see Figure 4.3-1).

San Diego goldenstar, An MSCP-covered species and California Native Plant Society (CNPS) list 1B.1 species, was observed outside of the MHPA within the disturbed southern mixed chaparral.

Ashy spike-moss, a CNPS list 4.1 species, was observed on-site. This species is widespread within suitable habitat throughout the City.

Decumbent goldenbush, a CNPS list 1B.2 species, was observed on-site. This species is widespread within suitable habitat throughout the City.

Western dichondra, a CNPS list 4.2 species, was observed on-site. This species is widespread within suitable habitat throughout the City.

Golden-rayed pentachaeta, a CNPS list 4.2 species, was observed on-site. This species is widespread within suitable habitat throughout the City.

Species that are known to occur in the project vicinity (within two miles of the project site) which are federally listed threatened or endangered, considered a City of San Diego narrow endemic, or have potential to occur based on species range are discussed in Attachment 1 of Appendix E. Of these, there is a moderate potential for one sensitive plant species, Nuttall's scrub oak (*Quercus dumosa*), to occur due to the presence of several individuals identified immediately outside of the southern boundary.

Rare plant surveys were conducted to determine presence/absence of federal and state listed or narrow endemic species, including San Diego ambrosia (*Ambrosia pumila*), spreading navarretia (*Navarretia fossalis*), and California Orcutt grass (*Orcuttia californica*) within the seasonal depressions and drainages. None of these species were identified during focused surveys and they are considered unlikely to occur on-site due to the lack of appropriate conditions.

4.3.1.5 Sensitive Wildlife Species

Two sensitive wildlife species were detected on-site: coastal California gnatcatcher (*Polioptila californica californica*) and Cooper's hawk (*Accipiter cooperii*) (see Figure 4.3-1).

Coastal California Gnatcatcher is a federally threatened species and a California species of concern. A single adult male was observed incidentally foraging on-site within the disturbed southern mixed chaparral during a Quino checkerspot butterfly survey. There is also moderate potential that coastal California gnatcatcher may nest within the disturbed coastal sage scrub within the MHPA within the northern portion of the project area.

Cooper's Hawk, a CDFW species of special concern and MSCP-covered species, was observed on-site.

Image source: SanGIS (flown May 2012)

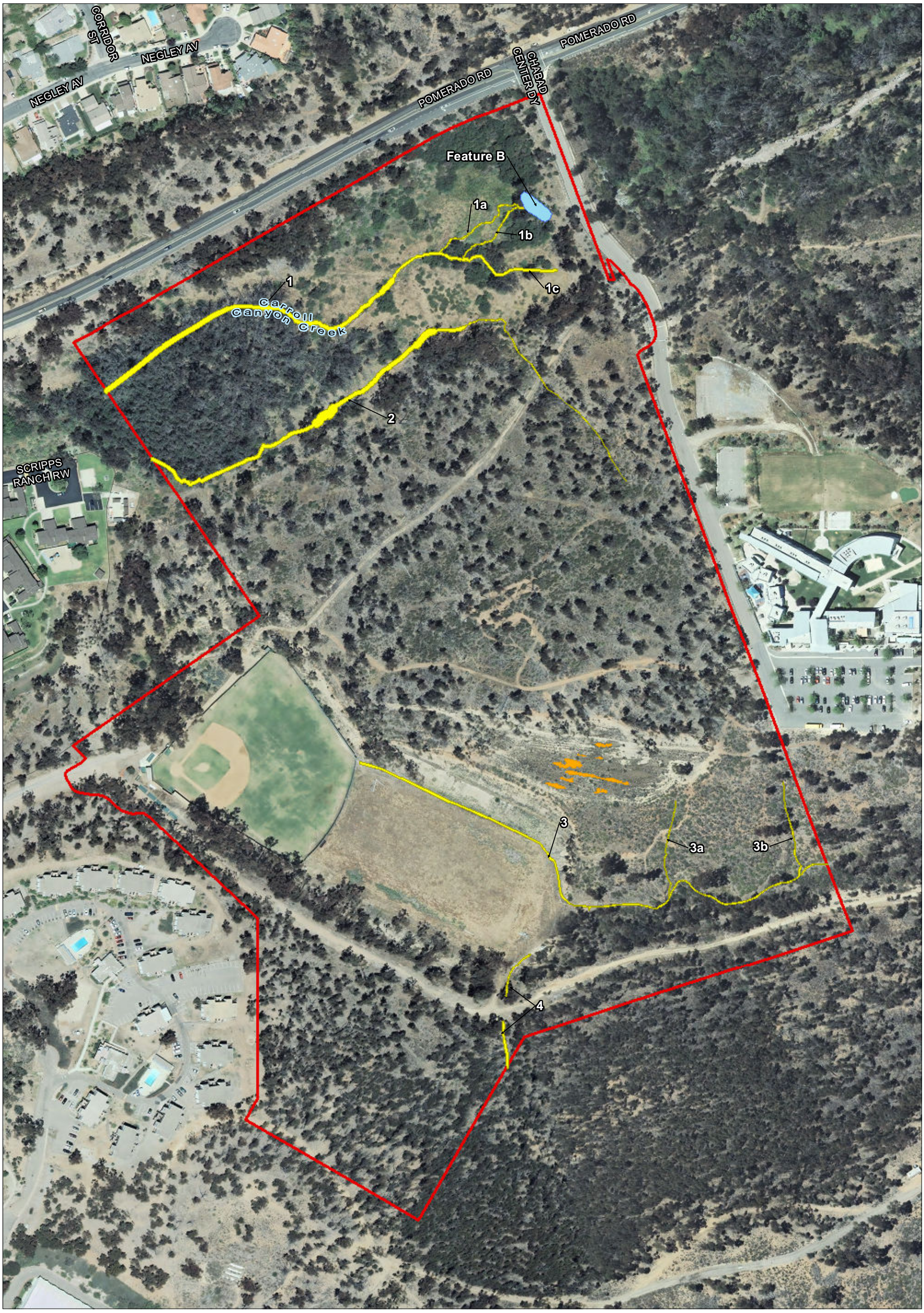

FIGURE 4.3-2a

ACOE Jurisdictional Waters within Survey Area

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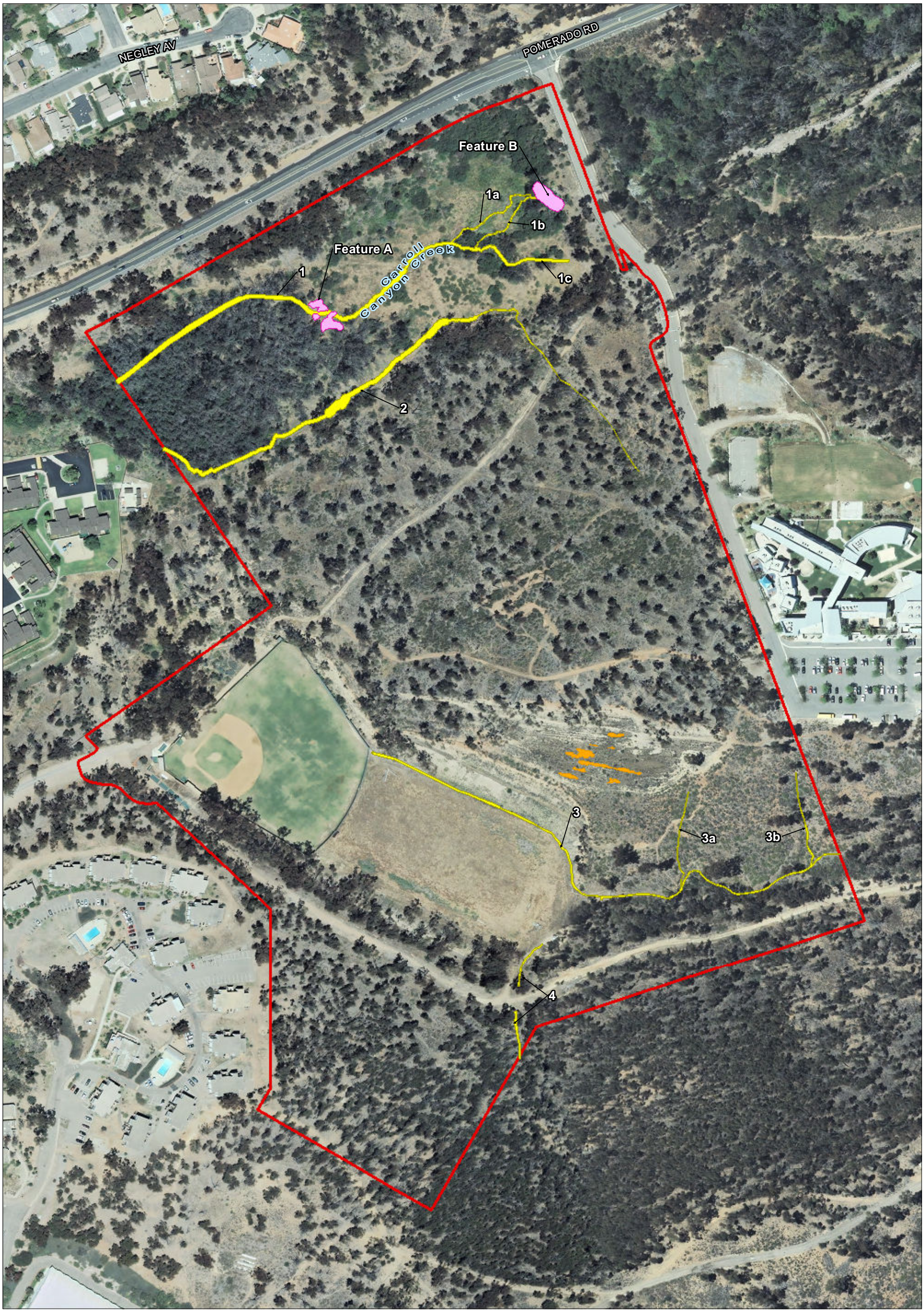
Image source: SanGIS (flown May 2012)



Project Area
Wetland Feature
Drainage Feature
Seasonal Depressions

Jurisdictional Waters

CDFW/RWQCB Wetlands
CDFW/RWQCB Streambed

0 Feet 200

FIGURE 4.3-2b

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CDFW/RWQCB Jurisdictional Waters within Survey Area

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Image source: SanGIS (flown May 2012)

Project Area

Wetland Feature

Seasonal Depressions

Jurisdictional Waters

City of San Diego Wetlands

FIGURE 4.3-2c

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City of San Diego Jurisdictional Waters within Survey Area

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Species that are known to occur in the project vicinity (within two miles of the project site) which are federally listed threatened or endangered, considered a City of San Diego narrow endemic, or have potential to occur based on species range are discussed in Attachment 4 of Appendix E. Of these, there is a moderate potential for three sensitive species to occur on-site due to the presence of suitable habitat: Belding's orange-throated whiptail (*Aspidoscelis* [=*Cnemidophorus*] *hyperythra beldingi*), a California species of special concern and a covered species under the MSCP; coast horned lizard (*Phrynosoma coronatum blainvillii*), a California species of special concern and a covered species under the MSCP; and red diamond rattlesnake (*Crotalus ruber*), a California species of special concern. There is also potential for raptors and other birds to nest on-site due to the presence of large eucalyptus trees and suitable Diegan coastal sage scrub, southern mixed chaparral, and grassland habitat.

Protocol surveys were conducted to determine the presence/absence of San Diego fairy shrimp and Quino checkerspot butterfly on-site. Neither species were detected during protocol surveys.

4.3.1.6 Wildlife Movement and Corridors

Wildlife movement corridors are defined as areas that connect suitable wildlife habitat areas in a region otherwise fragmented by rugged terrain, changes in vegetation, or human disturbance. Natural features such as canyon drainages, ridgelines, or areas with vegetation cover provide corridors for wildlife travel. Wildlife movement corridors are important because they provide access to mates, food, and water; allow the dispersal of individuals away from high population density areas; and facilitate the exchange of genetic traits between populations (Beier and Loe 1992). Wildlife movement corridors are considered sensitive by the City and resource and conservation agencies.

The northern portion of the project site is located within Carroll Canyon, an urban canyon system bounded by residential development, roads, and fencing which ultimately restrict its use by wildlife. Furthermore, the canyon is not designated as a MSCP regional wildlife corridor as it does not provide a throughway for wildlife species by connecting with major areas of off-site habitat. Therefore, the project site would not be considered a significant wildlife movement corridor.

Additionally, the northern portion of the project site would be preserved on-site and dedicated to the MHPA; therefore, the project would not interfere substantially with the movement of any wildlife species or with established native resident or migratory wildlife corridors, including linkages identified in the MSCP, or impede the use of native wildlife nursery sites.

4.3.1.7 Regulatory Framework

a. Natural Habitat Conservation and Planning

The Natural Community Conservation Planning (NCCP) program was enacted by the State of California in 1991 to provide long-term regional protection of natural vegetation and wildlife

diversity while allowing compatible development. The NCCP process was initiated to provide an alternative to single-species conservation efforts (habitat conservation plans). Instead, the NCCP is intended to provide a regional approach to the protection of species within a designated natural community. In the City, the MSCP is an outgrowth of this planning.

b. Multiple Species Conservation Program

The MSCP is a comprehensive habitat conservation planning program for San Diego County. Local jurisdictions, including the City, implement their portions of the MSCP through subarea plans, which describe specific implementing mechanisms. The City's MSCP Subarea Plan, approved in March 1997, is a plan and process for the issuance of permits under the federal and state Endangered Species Act and the California Natural Communities Conservation Planning Act of 1991. The primary goal of the MSCP Subarea Plan is to conserve viable populations of sensitive species and to conserve regional biodiversity while allowing for reasonable economic growth.

In July 1997, the City signed an Implementing Agreement with the USFWS and the CDFW. The Implementing Agreement serves as a binding contract between the City, the USFWS, and the CDFW that identifies the roles and responsibilities of the parties to implement the MSCP and Subarea Plan. The agreement allows the City to issue incidental take authorizations under the provisions of the MSCP. Applicable state and federal permits are still required for wetlands and listed species that are not covered by the MSCP.

c. Multi-Habitat Planning Area

One of the primary objectives of the MSCP is to identify and maintain a preserve system, which allows for animals and plants to exist at both the local and regional levels. The MSCP has identified large blocks of native habitat having the ability to support a diversity of plant and animal life known as "core biological resource areas." "Linkages" between these core areas provide for wildlife movement. These lands have been determined to provide the necessary habitat quality, quantity, and connectivity to sustain the unique biodiversity of the San Diego region. Input from responsible agencies and other interested participants resulted in creation of the City's MHPA. The MHPA is the area within which the permanent MSCP preserve would be assembled and managed for its biological resources. MHPA lands are considered by the City to be sensitive biological resources.

In accordance with the MSCP, for parcels located outside the MHPA:

> there is no limit on encroachments into sensitive biological resources, with the exception of wetlands and listed non-covered species' habitat [which are regulated by federal and state agencies and narrow endemic species as described below] …impacts to sensitive biological resources must be assessed, and mitigation, where necessary, must be provided in conformance with Section III of [the City's Biological Guidelines] (City of San Diego 2012).

To address the integrity of the MHPA, guidelines were developed to manage land uses adjacent to the MHPA. The adjacency guidelines are intended to be addressed on a project-by-project basis either in the planning or management stage. These guidelines address the issues of drainage, toxics, lighting, noise, invasives, brush management, access to MHPA, and grading/land development, and are discussed further in Section 4.1.5, Land Use.

As described in more detail in 4.3.1.5c, MHPA lands are those that have been included within the City's MSCP Subarea Plan for habitat conservation. These lands have been determined to provide the necessary habitat quality, quantity, and connectivity to sustain the unique biodiversity of the San Diego region. MHPA lands are considered by the City to be a sensitive biological resource. A total of 4.31 acres of the project site is located within the MHPA, and the majority of the site is adjacent to MHPA (Figure 4.3-3).

d. Land Development Code

The City of San Diego has developed a set of Biological Guidelines that are to be used as part of the environmental review process to meet the requirements of CEQA, the MSCP, and the ESL. The project site contains ESL due to the presence of sensitive biological resources according to the ESL definition:

> The ESL defines sensitive biological resources as those lands included within the MHPA . . . and other lands outside of the MHPA that contain wetlands; vegetation communities classifiable as Tier I, II, IIIA, or IIIB; habitat for rare, endangered or threatened species; or narrow endemic species (City of San Diego 2012).

4.3.2 Significance Determination Thresholds

Potential impacts to biological resources are assessed through review of the project's consistency with the City's ESL regulations, Biology Guidelines, and MSCP Subarea Plan.

Based on the City's 2011 Significance Determination Thresholds, impacts related to biological resources would be significant if the project would:

1. Result in a substantial adverse impact, either directly or through habitat modifications, to any species identified as a candidate, sensitive, or special status species in the MSCP or other local or regional plans, policies or regulations, or by the CDFW or USFWS;

2. Result in a substantial adverse impact on any Tier I Habitats, Tier II Habitats, Tier IIIA Habitats, or Tier IIIB Habitats as identified in the Biology Guidelines of the Land Development Code or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS;

3. Result in a substantial adverse impact on wetlands (including, but not limited to, marsh, vernal pool, riparian, etc.) through direct removal, filling, hydrological interruption, or other means;

4. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, including linkages identified in the MSCP, or impede the use of native wildlife nursery sites;

5. Conflict with the provisions of an adopted Habitat Conservation Plan (HCP), NCCP, or other approved local, regional, or state habitat conservation plan, either within the MSCP plan area or in the surrounding region;

6. Introduce a land use with an area adjacent to the MHPA that would result in adverse edge effects;

7. Result in the introduction of invasive species of plants into a natural open space area.

Before a determination of the significance of an impact can be made, the presence and nature of the biological resources must be established. Thus, significance determination, pursuant to San Diego's Significance Determination Thresholds, proceeds in two steps. The first step consists of determining if significant biological resources are present. The second step is to determine the sensitivity of identified biological resources in terms of direct, indirect, and cumulative impacts that would result from project implementation.

4.3.2.1 Biological Resources Determination

Pursuant to San Diego's Significance Determination Thresholds, existence of any of the following situations associated with the project site may indicate the presence of significant biological resources:

- The site has been identified as part of the MHPA by the City's MSCP Subarea Plan.

- The site supports or could support Tier I, II, IIIA & B vegetation communities (such as grassland, chaparral, coastal sage scrub).

- The site contains, or comes within 100 feet of a natural or man-made drainage.

- The site does not support a "covered" (per MSCP) vegetation community; however, important wildlife species may use the site for a corridor, etc.

Image source: SanGIS (flown May 2012)

FIGURE 4.3-3

Project in Relation to MSCP Preserve Area

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4.3.2.2 Biological Impacts Determination

Pursuant to San Diego's Significance Determination Thresholds, occurrence of any of the following situations associated with identified biological resources may indicate significant direct and indirect biological impacts.

a. Direct Impacts

- Any encroachment in the MHPA is considered a significant impact to the preservation goals of the MSCP. Any encroachment into the MHPA (in excess of the allowable encroachment by a project) would require a boundary adjustment, which would include a habitat equivalency assessment to ensure that what would be added to the MHPA is at least equivalent to what would be removed.

- Lands containing Tier I, II, IIIA, and IIIB habitats and all wetlands are considered sensitive and declining habitats. Impacts to these resources may be considered significant.

- Impacts to individual sensitive species, outside of any impacts to habitat, may also be considered significant based upon the rarity and extent of impacts. Impacts to state or federally listed species and all narrow endemics should be considered significant.

- Certain species covered by the MSCP and other species not covered by the MSCP may be considered significant on a case-by-case basis, taking into consideration all pertinent information regarding distribution, rarity, and the level of habitat conservation afforded by the MSCP.

b. Indirect Impacts

The Significance Determination Thresholds indicate that depending on the circumstances, indirect effects of a project may be as significant as the direct effects of the project. Indirect effects include, but are not limited to, the following impacts:

- Introduction of urban meso-predators into a biological system.

- Introduction of urban runoff into a biological system.

- Introduction of invasive exotic plant species into a biological system.

- Noise and lighting impacts.

- Alteration of a dynamic portion of a system, such as stream flow characteristics or fire cycles.

- Loss of a wetland buffer that includes no environmentally sensitive lands.

4.3.3 Issue 1: Sensitive Species

Would the project result in a substantial adverse impact, either directly or through habitat modifications, to any species identified as a candidate, sensitive, or special status species in the MSCP or other local or regional plans, policies or regulations, or by the CDFW or USFWS?

4.3.3.1 Impacts

a. Plant Species

San Diego goldenstar was observed within the development footprint outside of the MHPA within the disturbed southern mixed chaparral. Direct impacts to San Diego goldenstar would be less than significant, as this species is considered adequately conserved within the MHPA and project impacts to this species would occur outside of the MHPA.

Ashy spike-moss is widespread within suitable habitat throughout the City and impacts would occur to a relatively small amount of habitat. Therefore, project impacts would not affect the regional long-term survival of this species and would be less than significant.

Decumbent goldenbush is widespread within suitable habitat throughout the City, and impacts would occur to a relatively small amount of habitat. Therefore, project impacts would not affect the regional long-term survival of this species and would be less than significant.

Western dichondra is widespread within suitable habitat throughout the City and impacts would occur to a relatively small amount of habitat. Therefore, project impacts would not affect the regional long-term survival of this species and would be less than significant.

Golden-rayed pentachaeta is widespread within suitable habitat throughout the City, and impacts would occur to a relatively small amount of habitat. Therefore, project impacts would not affect the regional long-term survival of this species and would be less than significant.

b. Wildlife Species

Cooper's Hawk. Direct impacts to Cooper's hawk could potentially result from the removal of eucalyptus trees on-site. Indirect impacts could result from excessive noise and lighting generated from project construction, should grading occur within or adjacent to occupied habitat in the MHPA during the breeding season (February 1–September 15). Direct or indirect impacts to Cooper's hawk would be significant.

Coastal California Gnatcatcher. Direct impacts are not anticipated to occur to coastal California gnatcatcher as only a single adult male was observed foraging on-site within the disturbed southern mixed chaparral. Due to the fact that the disturbed southern mixed chaparral is not ideal nesting habitat for this species and no gnatcatcher individuals were detected on subsequent visits to the site, it is believed that this bird may have been flying through and did not establish a territory within the survey area. However, indirect impacts to coastal California

gnatcatcher could result from excessive noise and lighting generated from project construction should grading occur within or adjacent to occupied habitat in the MHPA during the breeding season (March 1–August 15).

Least Bell's Vireo. Although there is 0.09 acre of riparian scrub on-site, it is not expected that least Bell's vireo would occur within the survey area, and none were detected during the non-protocol site surveys. The small amount of riparian scrub on-site is split into two patches and are isolated from one another and from any larger, significant stands of riparian habitat. Additionally, these patches are surrounded by upland habitat and do not support the vegetation structure preferred by least Bell's vireo.

Nesting Birds. There is a potential for raptors and other birds to nest in large eucalyptus trees, Diegan coastal sage scrub, southern mixed chaparral, and grassland habitats within the project area. Direct impacts to migratory or nesting birds would be significant.

Coast Horned Lizard and Belding's Orange-throated Whiptail.

There is a low potential for direct impacts to occur to the coastal horned lizard and Belding's orange-throated whiptail, if present, during grading activities. Although suitable habitat is present, the site is not expected to support a significant population of these species as they were not observed during surveys of the site. Any potential impacts to these species are not expected to reduce this species' overall populations below self-sustaining levels; thus, project impacts would be considered less than significant. Additionally, the project will also comply with all area specific management directives for these species required by the MSCP (City of San Diego 1997).

Red-diamond Rattlesnake. Although red-diamond rattlesnake was not detected during surveys, direct impacts to red diamond rattlesnake could potentially result from vegetation clearing, grubbing, grading, and construction activities within suitable disturbed Diegan coastal sage scrub and disturbed southern mixed chaparral habitat. However, this species is widespread within suitable habitat throughout the City, and impacts would occur to a relatively small amount of habitat. Therefore, project impacts would not affect the regional long-term survival of this species and would be less than significant.

4.3.3.2 Significance of Impacts

a. Plant Species

Project impacts to San Diego goldenstar, decumbent goldenbush, ashy spike-moss, and golden-rayed pentachaeta would be less than significant. Direct impacts to San Diego goldenstar would not be significant because this species is covered under the MSCP and impacts would occur outside of the MHPA. Impacts to decumbent goldenbush, ashy spike-moss, golden-rayed pentachaeta, and western dichondra would not affect the regional long-term survival of this species and therefore would be less than significant.

b. Wildlife Species

No coastal California gnatcatcher or raptor nests have been observed on-site; however, the on- and off-site project grading and construction could have direct impacts to Cooper's hawk, raptors, and other migratory or nesting birds located within the project footprint. The project construction activities could indirectly impact coastal California gnatcatcher from noise, intrusion, water quality, and lighting, potentially resulting in a significant biological impact. Direct impacts to Cooper's hawk, raptors, and migratory or nesting birds and indirect impacts to coastal California gnatcatcher would be significant.

Direct impacts to coast horned lizard, Belding's orange-throated whiptail, and red-diamond rattlesnake would be less than significant, as the project would comply with the MSCP Subarea Plan Appendix A conditions of coverage for these species and project impacts would not affect the regional long-term survival of these species.

4.3.3.3 Mitigation, Monitoring, and Reporting

a. Plant Species

Impacts to sensitive plant species would be less than significant. No mitigation is required.

b. Wildlife Species

Mitigation for construction-related impacts related to MHPA adjacency as well as impacts to coastal California gnatcatcher and other nesting birds would include protocol surveys, construction buffers, and biological construction monitoring as detailed in BIO-1 and the procedures outlined in **LAND-1** and **LAND-2** in Section 4.1, Land Use.

BIO-1: To avoid any direct impacts to raptors and/or any native/migratory birds, removal of habitat that supports active nests in the proposed area of disturbance should occur outside of the breeding season for these species (February 1 to September 15). If removal of habitat in the proposed area of disturbance must occur during the breeding season, the Qualified Biologist shall conduct a pre-construction survey to determine the presence or absence of nesting birds on the proposed area of disturbance. The pre-construction (precon) survey shall be conducted within 10 calendar days prior to the start of construction activities (including removal of vegetation). The applicant shall submit the results of the precon survey to City Development Services Department (DSD) for review and approval prior to initiating any construction activities.

If nesting birds are detected, a letter report or mitigation plan in conformance with the City's Biology Guidelines and applicable state and federal law (i.e., appropriate follow up surveys, monitoring schedules, construction and noise barriers/buffers, etc.) shall be prepared and include proposed measures to be implemented to ensure that take of birds or eggs or disturbance of breeding activities is avoided. The report or mitigation plan shall be submitted to the City DSD for review and approval and implemented to the satisfaction of the City. The City's Mitigation Monitoring Coordinator or Resident Engineer, and Biologist shall verify and approve

that all measures identified in the report or mitigation plan are in place prior to and/or during construction. If nesting birds are not detected during the precon survey, no further mitigation is required.

Additionally, the City of San Diego requires general monitoring as part of the avian protection requirements during construction. This requirement states:

> The Qualified Biologist shall monitor construction activities as needed to ensure that construction activities do not encroach into biologically sensitive areas, or cause other similar damage, and that the work plan has been amended to accommodate any sensitive species located during the pre-construction surveys.

4.3.3.4 Significance of Impacts after Mitigation

Indirect and direct impacts to nesting birds, raptors, and coastal California gnatcatcher would be mitigated to below a level of significance by measures BIO-1, LAND-1 and LAND-2. The project impacts to 41.58 acres of vegetation would be mitigated through habitat mitigation, as discussed in Section 4.3.4.

4.3.4 Issue 2: Sensitive Habitats

Would the project result in a substantial adverse impact on any Tier I Habitats, Tier II Habitats, Tier IIIA Habitats, or Tier IIIB Habitats as identified in the Biology Guidelines of the LDC or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS?

4.3.4.1 Impacts

The project would impact a maximum of 43.32 acres of the 53.38-acre project area, which includes 0.38 acre of off-site grading impacts (Figure 4.3-4). Table 4.3-3 summarizes the impacts to each vegetation community/land cover type through grading and development of the proposed project with the approved MHPA boundary line adjustment. As the 2.01 acres of brush management zone (BMZ) 2 areas are all part of the development footprint and being graded, they are calculated in as impacts to vegetation communities.

As previously detailed in Section 4.3.1.1, upland communities within the MSCP are divided into four tiers of sensitivity based on rarity and ecological importance (City of San Diego 2012). Tier I is the most sensitive, and Tier IV is not sensitive. Potential impacts to sensitive vegetation communities would include the loss of disturbed Diegan coastal sage scrub (0.77 acre) (Tier II), southern mixed chaparral (2.97 acres) (Tier III-A), disturbed southern mixed chaparral (21.91 acres) (Tier III-A), and disturbed non-native grassland (3.21 acres) (Tier III-B) for a total of 28.86 acres. Impacts to jurisdictional wetlands and waters are discussed in Section 4.3.5. Impacts to sensitive vegetation communities would be significant.

As discussed in Section 4.3.5.3, impacts to jurisdictional waters will be mitigated through on-site establishment/creation (0.34 acre) of ephemeral drainage within the northern section of the survey area. Currently, 0.10 acre of eucalyptus woodland and 0.24 acre of disturbed coastal sage scrub occupy this proposed mitigation area. As impacts to eucalyptus woodland are not significant and do not require mitigation, impacts to 0.24 acre of disturbed coastal sage scrub will require mitigation at a 1:1 ratio. Impacts to disturbed coastal sage scrub from the proposed development and from the proposed on-site mitigation area total 0.77 acre.

TABLE 4.3-3
IMPACTS TO VEGETATION COMMUNITIES/LAND COVER TYPES

Vegetation Communities/ Land Cover Types	ESL Tier	Existing Project Area*	On-Site Impacts	Off-Site Impacts	Impacts from On-site Mitigation	BMZ 2 Impacts	Total Project Area Impacts†
Disturbed Diegan Coastal Sage Scrub	II	3.08	0.53		0.24		0.77
Southern Mixed Chaparral	III-A	3.15	2.97				2.97
Disturbed Southern Mixed Chaparral*	III-A	22.67	21.49	0.11		0.31	21.91
Disturbed Non-native Grassland	III-B	3.21	3.21				3.21
Disturbed Land	IV	0.56	0.00				0.00
Eucalyptus Woodland	IV	13.70	6.40	0.22	0.10	1.39	8.11
Developed Land	N/A	6.30	5.82	0.05		0.31	6.18
Riparian Scrub	N/A	0.09	0.00				0.00
Other Features							
Ephemeral Drainages (unvegetated)	N/A	0.62	0.17‡	0.00		0.00	0.17
TOTAL	-	53.38	40.59	0.38		2.01	43.32

*Includes 0.05 acre of seasonal depressions.

†The total project impacts include the brush management zone 2 areas as these areas are part of the mass grading for the project development.

‡Impact acreages for ephemeral drainages (unvegetated) are shown here to account for all acreages, but are formally part of the proposed impacts to jurisdictional waters as non-wetland waters/streambed (see Table 4.3-6).

4.3.4.2 Significance of Impacts

The project would impact 28.86 acres of sensitive upland habitat consisting of disturbed Diegan coastal sage scrub, southern mixed chaparral, disturbed southern mixed chaparral, and disturbed non-native grassland. As described below, the project includes an MHPA boundary line adjustment. With the approved MHPA boundary line adjustment, all impacts would occur outside the MHPA. Impacts to sensitive habitats would be significant.

Image source: SanGIS (flown May 2012)

Project Area
Site Plan Lines
Off-Site Grading Improvement Areas
Brush Management - Zone 1
Brush Management - Zone 2
Limits of Disturbance
Suggested Location of Restoration/Establishment of Riparian Scrub (0.34 acres)
Existing MHPA
2 Drainage Feature
A Wetland Feature

Sensitive Plants

Ashy Spike Moss (*Selaginella cinerascens*)
Decumbent Goldenbush (*Isocoma menziesii* var. *decumbens*)
Golden-rayed Pentachaeta (*Pentachaeta aurea*)
San Diego Goldenstar (*Bloomeria clevelandii*)
Western Dichondra (*Dichondra occidentalis*)

Sensitive Wildlife

Cooper's Hawk (*Accipiter cooperii*)
Coastal California Gnatcatcher (*Polioptila californica californica*)

Ephemeral Drainage
Seasonal Depression
Drainage Flow Direction

Vegetation Cover and Habitat Type

Southern Mixed Chaparral
Disturbed Southern Mixed Chaparral
Disturbed Coastal Sage Scrub
Disturbed Non-native Grassland
Eucalyptus Woodland
Riparian Scrub
Disturbed
Developed

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FIGURE 4.3-4

Impacts to Biological Resources

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4.3.4.3 Mitigation, Monitoring, and Reporting

Sensitive Uplands

BIO-2: Prior to the issuance of a Notice to Proceed for a subdivision, or any construction permits, such as Demolition, Grading or Building, or beginning any construction related activity, project upland impacts shall be mitigated in accordance with the San Diego LDC Biology Guidelines, as specified in Table 4.3-4 based on all mitigation occurring within the MHPA.

With approval of the MHPA boundary line adjustment, mitigation for some of the impacts to sensitive vegetation communities would be achieved through the on-site preservation of lands (2.31 acres of disturbed Diegan coastal sage scrub and 0.76 acre of disturbed southern mixed chaparral) outside the development footprint, located on the north end of parcel, and dedication of this acreage to the MHPA in a covenant of easement. Mitigation land shall be conveyed to the City, as described in BIO-3.

Once the 2.31 acres of disturbed Diegan coastal sage scrub and 0.76 acre of disturbed southern mixed chaparral are applied towards mitigation, the remaining upland mitigation required consists of 10.14 acres of southern mixed chaparral and 1.61 acres of non-native grassland. The remaining 10.14 acres of chaparral mitigation will be satisfied either via a land acquisition and dedication to the MHPA of lands on Alliant International University, south of the project; and/or through purchasing off-site lands within the MHPA. The 1.61 acres of grassland mitigation will be satisfied through payment to the City's Habitat Acquisition Fund and/or through purchasing off-site lands within the MHPA. Mitigation for the 0.17 acre of impacts to non-wetland waters would occur on-site, and is discussed in BIO-4.

TABLE 4.3-4
MITIGATION REQUIREMENTS FOR IMPACTS TO SENSITIVE UPLAND VEGETATION COMMUNITIES WITH LOCATION OF PRESERVATION INSIDE MHPA (acres)

Vegetation Community	MSCP Tier	Existing	Impact (Outside MHPA)	Mitigation Ratio (inside MHPA)	Mitigation Requirement	On-site Preservation	Mitigation Excess	Off-Site Total Mitigation Required (off-site)
dCSS	II	3.08	0.77	1:1	0.77	2.31	1.54†	0.00
SMC (includes dSMC)	III-A	25.82	24.88*	0.5:1	12.44	0.76	0.00	10.14‡
dNNG	III-B	3.21	3.21	0.5:1	1.61	0.00	0.00	1.61
TOTAL								**11.75**

dCSS = Disturbed Diegan Coastal Sage Scrub, SMC = Southern Mixed Chaparral, dSMC = disturbed Southern Mixed Chaparral, dNNG = disturbed Non-Native Grassland
*0.31 acre of BMZ 2 is included in the total impact to this vegetation community.
†After 2.31 acres of on-site preservation is applied, there is a surplus of 1.54 acres of dCSS.
‡After the remaining 1.54 acres of dCSS is applied to the mitigation for SMC/dSMC through up-tiering, there is a balance of 8.52 acres of required mitigation remaining.

On-Site Preservation

BIO-3: After all restoration efforts have been signed off and accepted by the City, the on-site MHPA shall be conveyed to the City's MCSP preserve through one of the following:

a) Dedication. The Owner/Permittee/Applicant shall convey the mitigation area in fee title to San Diego, or other conservation entities found acceptable by San Diego, USFWS, or CDFW through an irrevocable offer of dedication via the Final Maps. Conveyance of any land in fee shall require approval from the Park and Recreation Department Open Space Division Deputy Director and shall exclude detention basins or other storm water control facilities and manufactured slopes (with the exception of those that might be associated with the potential landslide area; San Diego Biology Guidelines 2012).

b) Covenant of Easement. To the extent consistent with MSCP Implementing Agreement, the Owner/Permittee/Applicant must agree to a covenant of easement for the management of the mitigation area in perpetuity, recorded against the title of the property with the USFWS and the CDFW names as third party beneficiaries. Identification of permissible passive activities and any other conditions of the permit must be incorporated into the covenant (San Diego Biology Guidelines 2002).

c) Any other method of transfer permitted by the San Diego's MSCP Subarea Plan or Implementing Agreement.

To the extent consistent with MSCP Implementing Agreement and to facilitate MHPA conveyance, any non-fee areas located in the MHPA shall be lotted separately, with a covenant of easement, and be maintained in perpetuity by the Owner/Permittee/ Applicant, unless otherwise agreed to by San Diego. All other on-site areas can be conveyed through any of the above methods. A conceptual mitigation plan is provided within the Biological Resources Technical Report for this project as Attachment 8 (see Appendix E), which illustrates the chosen location of establishment/creation area, methods involved to implement the mitigation effort, and a maintenance and monitoring program which is required to ensure the success of the mitigation.

4.3.4.4 Significance of Impacts after Mitigation

Upland habitat impacts as a result of project development would be fully mitigated through measures BIO-1 and BIO-2. Upland impacts would be mitigated via preservation of habitat at ratios indicated in the LDC Biological Guidelines. The project proposes to provide the required upland mitigation on-site. To ensure proper conveyance to San Diego and preservation, a covenant of easement would be placed over this proposed mitigation, the land would be dedicated to the City, or preserved via another City of San Diego-approved method (see mitigation measure BIO-2). With implementation of the proposed mitigation measures, impacts to sensitive vegetation communities would be mitigated to below a level of significance.

4.3.5 Issue 3: Jurisdictional Wetlands and Waters

Would the project result in a substantial adverse impact on wetlands (including, but not limited to, marsh, vernal pool, riparian, etc.) through direct removal, filling, hydrological interruption, or other means?

4.3.5.1 Impacts

No direct impacts to ACOE, CDFW, RWQCB, or City wetlands would occur from the implementation of the project; however, 0.17 acre of non-wetland streambed waters regulated by the ACOE, CDFW, and RWQCB would be impacted (Table 4.3-5). As no impacts to City wetlands would occur, the project would not require a deviation from the ESL wetland regulations. No indirect impacts to the wetlands along Carroll Canyon Creek downstream of the proposed development are anticipated as the wetlands will still receive natural flows via the culvert located at the wetland at Feature B and treated storm water runoff from outlets from the detention basin to the upstream of the wetlands at Feature A. The combined runoff from Carroll Canyon Creek and treated storm water from the detention basin will also be sufficient to support the proposed wetland mitigation area to be located near the wetland at Feature A. Project impacts to jurisdictional resources are shown on Figures 4.3-5a through 4.3-5c. Impacts to non-wetland water resources would be significant.

TABLE 4.3-5
PROPOSED IMPACTS TO JURISDICTIONAL WATERS

Agency	Existing Non-Wetland Waters/Streambed (ephemeral drainages)	Impacts to Non-Wetland Waters/Streambed (ephemeral drainages)	Existing Wetlands (Riparian Scrub)	Impacts to Wetlands (Riparian Scrub)
ACOE	0.62	0.17	0.05	0.00
CDFW/RWQCB	0.62	0.17	0.09	0.00
City of San Diego	0.00	0.00	0.09	0.00

4.3.5.2 Significance of Impacts

Impacts to ACOE, CDFW, and RWQCB jurisdictional waters would be permanent and significant. These jurisdictional resources are composed of ACOE non-wetland waters of the U.S. and CDFW/RWQCB streambed.

4.3.5.3 Mitigation, Monitoring, and Reporting

Wetlands

BIO-4: Prior to the issuance of a Notice to Proceed for a subdivision, or any construction permits, such as Demolition, Grading, or Building, or beginning any construction related activity on-site, notification to the ACOE Section 404 Nationwide Permit Program, a Streambed

Alteration Agreement from the CDFW, and a 401 Water Quality Certification from the RWQCB would be required. To reduce impacts to jurisdictional resources to less than significant, mitigation of 0.34 acre for impacts to ACOE and CDFW/RWQCB jurisdictional non-wetland waters/streambed would be required (Table 4.3-6).

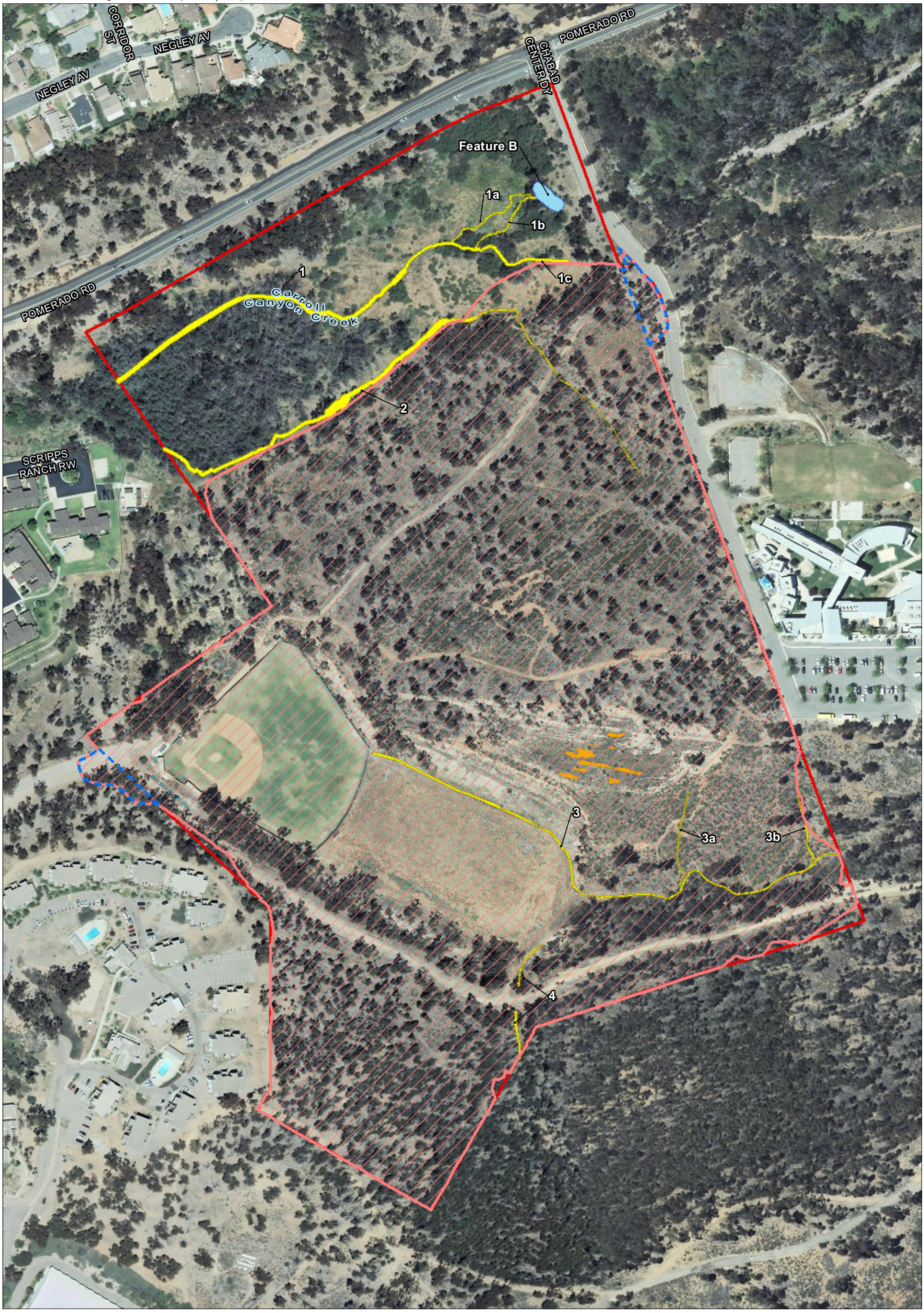
BIO-5: Prior to the issuance of a Notice To Proceed for a subdivision, or any construction permits, such as Demolition, Grading or Building, or beginning any construction related activity on-site, the applicant shall obtain the appropriate ACOE permit, CDFW streambed alteration agreement, and RWQCB water quality certification. Mitigation shall proceed according to permitting requirements of the applicable Resource Agencies and in accordance with City of San Diego's wetland mitigation requirements. The mitigation shall consist of a 2:1 establishment/creation of riparian habitat to ensure no net loss of non-wetland waters; therefore, a minimum mitigation of 0.34 acre shall be required (see Table 4.3-6). This on-site establishment/creation of ephemeral drainage will occur by widening the existing channel within the northern section of the survey area to achieve a 2:1 ratio (i.e., 0.34 acre). The banks of the new channel would be stabilized with riparian scrub plant species that are tolerant of the drier floodplain conditions. A conceptual mitigation plan is provided within the Biological Resources Technical Report for this project as Attachment 8 (see Appendix E), which illustrates the chosen location of establishment/creation area, methods involved to implement the mitigation effort, and a maintenance and monitoring program which is required to ensure the success of the mitigation.

TABLE 4.3-6
PROPOSED MITIGATION FOR IMPACTS TO JURISDICTIONAL WATERS/WETLANDS
(With Direct Impacts to Non-Wetland Water/Streambed at 2:1 Ratio)

Agency	Jurisdictional Waters/ Wetlands	Existing Jurisdictional Waters/ Wetlands (acres)	Impacts to Jurisdictional Waters/Wetlands (acres)	Mitigation Ratio	Total Mitigation (acres)
ACOE	Wetlands (Riparian Scrub)	0.05	0.00	2:1	0.00
	Non-wetland waters of the U.S.	0.62	0.17	2:1	0.34
	Total ACOE	**0.67**	**0.17**	**-**	**0.34**
CDFW/ RWQCB	Wetlands (Riparian Scrub)	0.09	0.00	2:1	0.00
	Streambed	0.62	0.17	2:1	0.34
	Total CDFW	**0.71**	**0.17**	-	**0.34**
City of San Diego	Wetland (Riparian Scrub)	0.09	0.00	2:1	0.00
	Total City of San Diego	**0.09**	**0.00**	-	**0.00**

BIO-6: Prior to the issuance of a Notice To Proceed for a subdivision, or any construction permits, such as Demolition, Grading or Building, or beginning any construction related activity on-site, a qualified biologist shall submit a final Wetland Mitigation Plan to the USACE, RWQCB, San Diego (Park and Recreation, EAS, and MSCP), and CDFW for review and approval. A conceptual mitigation plan has been provided which illustrates the chosen location of establishment/creation area, methods involved to implement the mitigation effort, and a maintenance and monitoring program which is required to ensure the success of the mitigation (RECON 2015b).

Image source: SanGIS (flown May 2012)



Project Area
Off-Site Grading Improvement Areas
Direct Impacts
Wetland Feature
Drainage Feature
Seasonal Depressions

Jurisdictional Waters

ACOE Wetlands
ACOE Non-wetland Waters of the U.S.

0 Feet 200

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FIGURE 4.3-5a

Impacts to ACOE Jurisdictional Waters within Survey Area

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Image source: SanGIS (flown May 2012)

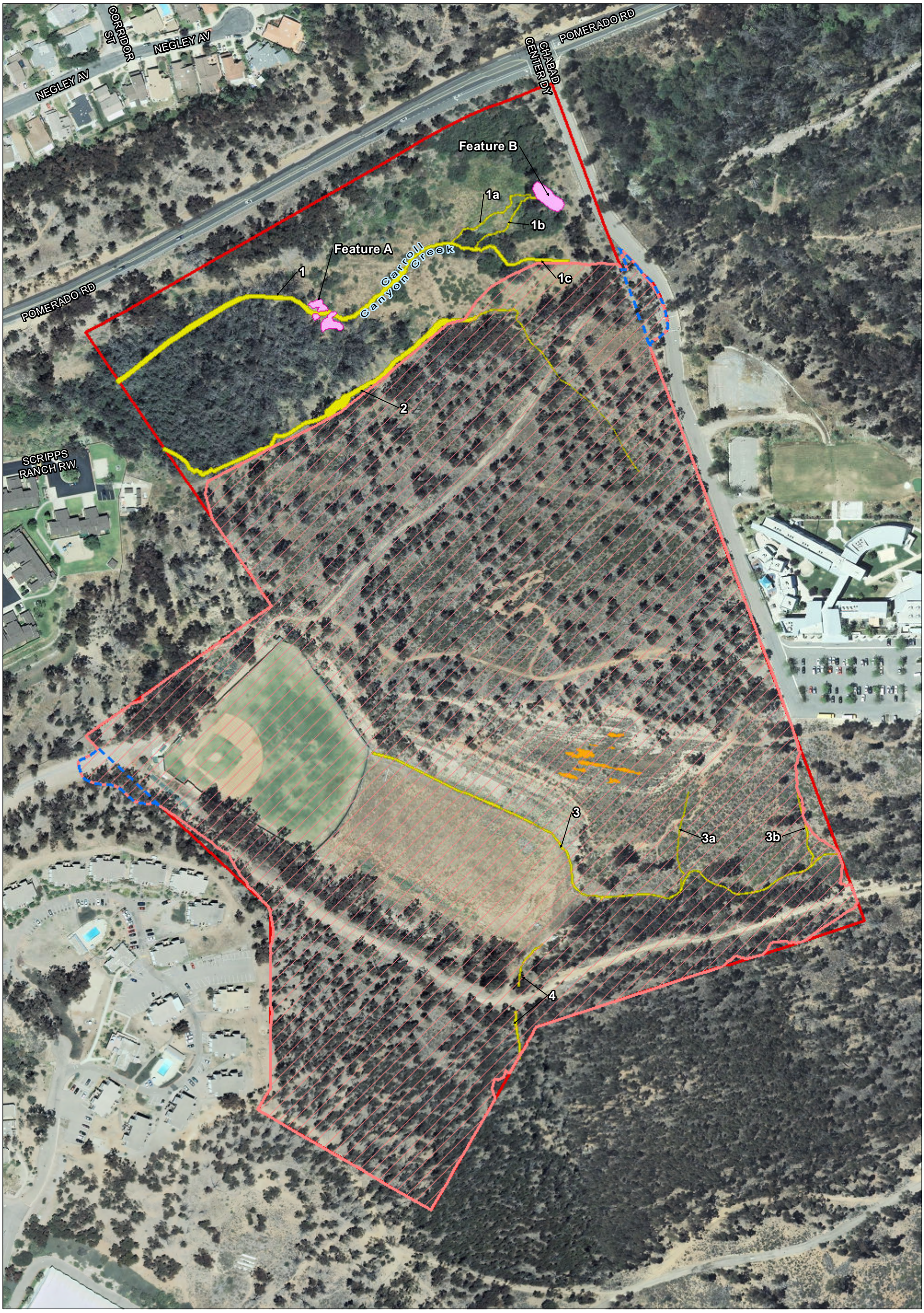

FIGURE 4.3-5b

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Impacts to CDFW/RWQCB Jurisdictional Waters/Wetlands within Survey Area

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Image source: SanGIS (flown May 2012)

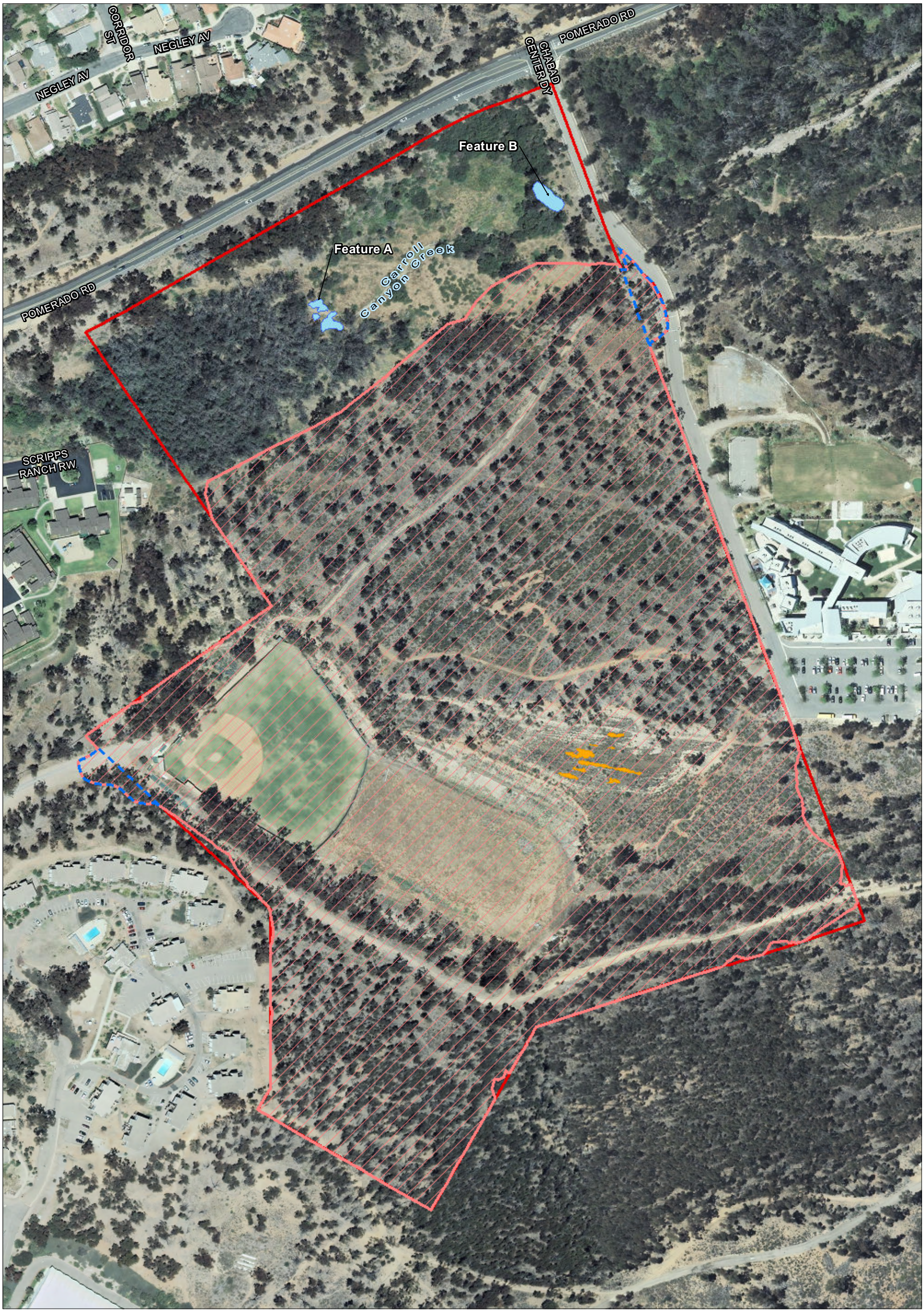

FIGURE 4.3-5c

City Wetlands in Relation to Project Impact Areas

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4.3.5.4 Significance of Impacts after Mitigation

Implementation of the mitigation measures outlined in Section 4.3.5.3 would reduce all impacts to less than significant.

4.3.6 Issue 4: Wildlife Corridors

Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, including linkages identified in the MSCP, or impede the use of native wildlife nursery sites?

4.3.6.1 Impacts

As discussed above, the project site does not currently function as a significant wildlife movement corridor. The northern portion of the project site is located within Carroll Canyon, an urban canyon system bounded by residential development, roads, and fencing which ultimately restrict its use. Although the canyon may function for local wildlife movement, the canyon is not a significant MSCP regional corridor and does not provide a throughway for wildlife species into major areas of off-site habitats. Additionally, the northern portion of the project site is being preserved on-site and dedicated to the MHPA; therefore, the project would not interfere substantially with the movement of any wildlife species or with established native resident or migratory wildlife corridors, including linkages identified in the MSCP, or impede the use of native wildlife nursery sites.

4.3.6.2 Significance of Impacts

The project would not result in any obstruction to wildlife movement corridors. As such, impacts would be less than significant.

4.3.6.3 Mitigation, Monitoring, and Reporting

Impacts would be less than significant. No mitigation is required.

4.3.7 Issue 5: MHPA Boundary Line Adjustment Equivalency

Would the project conflict with the provisions of an adopted HCP, NCCP, or other approved local, regional, or state habitat conservation plan, either within the MSCP plan area or in the surrounding region?

4.3.7.1 Impacts

Currently, the development footprint overlaps 1.87 acres of MHPA composed of southern mixed chaparral, disturbed southern mixed chaparral, and eucalyptus woodland on-site located in the northwest portion of the site and developed land located off-site (see Figure 4.3-4). An

equivalency determination is provided to ensure that the land added into the MHPA is of equal or better value than the land removed from the MHPA. Figure 4.3-6 shows the location of on-site preservation with potential to dedicate to the MHPA, totaling 9.90 acres.

The boundary line adjustment was recently proposed in order to avoid direct project impacts to the MHPA and approved by the Wildlife Agencies on October 27, 2014. As described in Appendix E, 1.87 acres will be removed from the MHPA, and 7.46 acres of land would be added and dedicated to the MHPA via a conservation easement (Table 4.3-7). As a result of this on-site land exchange, the MHPA land on-site would total 9.90 acres (see Table 4.3-7). Thus, the project would result in a net gain of 5.59 acres of MHPA. In addition, the approved MHPA boundary line adjustment will be beneficial to the overall MHPA preserve at this location due to an increase in Tier II habitat. Thus, this land exchange would comply with the overall MSCP policy for boundary line adjustments, as it would result in equal or higher biological values of the preserve to species and habitats.

TABLE 4.3-7
MHPA BOUNDARY LINE ADJUSTMENT SUMMARY
(acres)

Vegetation Communities/ Land Cover Types	Existing MHPA	MHPA Deletion	MHPA Addition	Net Change	On-Site Preservation with Dedication to the MHPA
Disturbed Diegan Coastal Sage Scrub	0.10	0.00	2.41	+2.45	2.31
Disturbed Southern Mixed Chaparral	1.80	1.77	0.78	-1.04	0.76
Eucalyptus Woodland	2.23	0.06	3.15	+3.26	5.49
Disturbed Land	0.00	0.00	0.56	+0.56	0.56
Developed Land	0.04	0.04	0.00	-0.04	0.00
Riparian Scrub	0.00	0.00	0.09	+0.09	0.09
Other Features					
Ephemeral Drainage	0.14	0.03	0.31	+0.31	0.55
TOTAL	**4.31**	**1.87**	**7.46**	**+5.59**	**9.90**

4.3.7.2 Significance of Impacts

As the MHPA boundary line adjustment will result in an increase in the amount of MHPA lands (5.59 acres) and will result in an increase in habitat value, impacts associated with the MHPA boundary line adjustment will be less than significant.

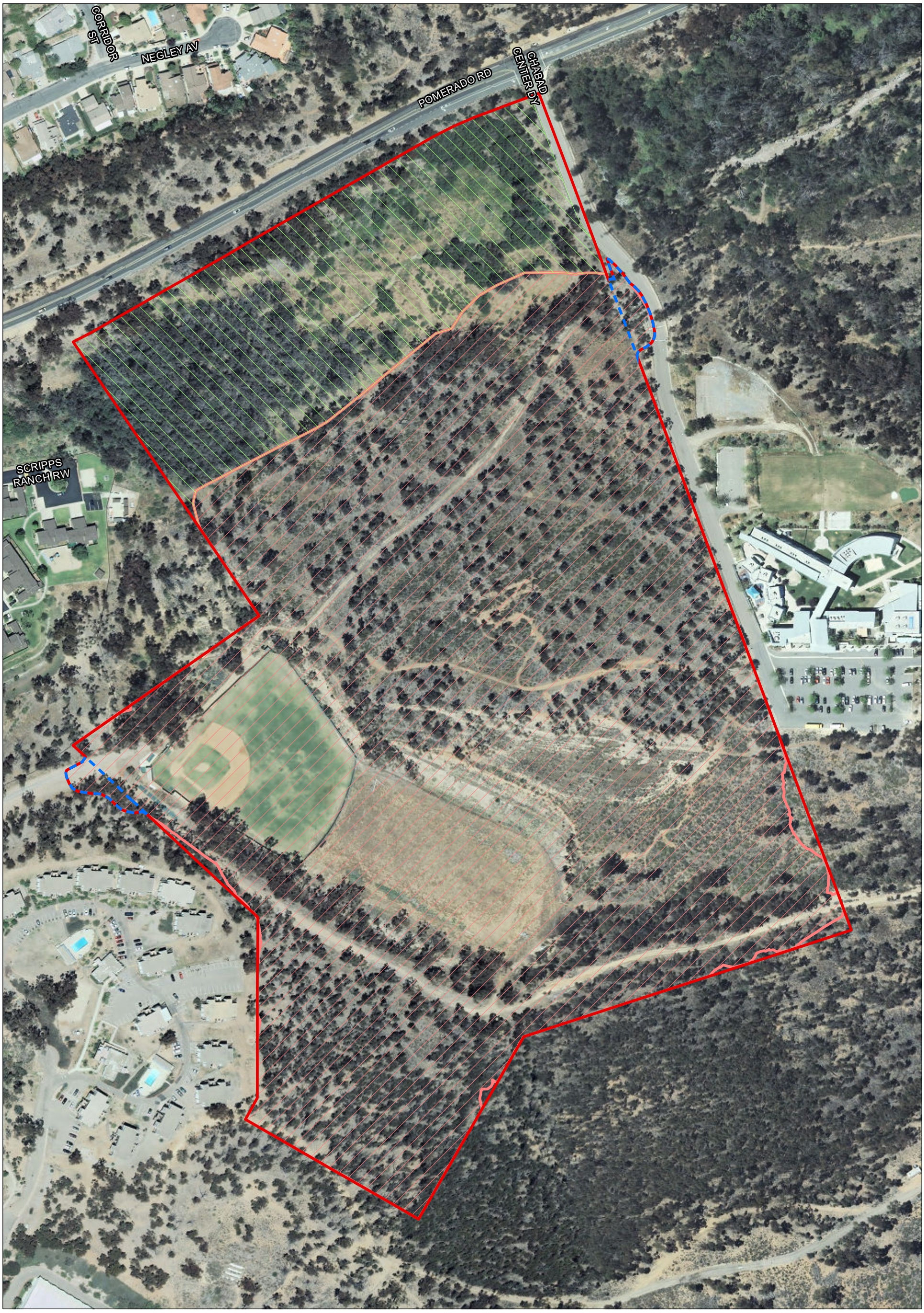
4.3.7.3 Mitigation, Monitoring, and Reporting

Impacts would be less than significant. No mitigation is required.

4.3.8 Issue 6: MHPA Land Use Adjacency

Would the project introduce a land use with an area adjacent to the MHPA that would result in adverse edge effects?

Image source: SanGIS (flown May 2012)



Project Area

Off-Site Grading Improvement Areas

Direct Impacts

Potential On-site Preservation to Dedicate to the MHPA

0 Feet 200

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FIGURE 4.3-6

Acreage of On-site Preservation with Potential to Dedicate to MHPA

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4.3.8.1 Impacts

The MHPA has been designed to maximize conservation of sensitive biological resources, including sensitive species. When land is developed adjacent to the MHPA, there is a potential for indirect impacts, or edge effects, that may degrade the habitat value or disrupt animals within the preserve area. These impacts could be short-term, resulting from construction activities, or long-term. Short-term construction impacts could result in disruption of nesting and breeding and could thus affect the population of sensitive species. Long-term impacts would be associated with drainage, toxins, lighting, noise, invasives, brush management, access to MHPA, and grading/land development. Impacts to the MHPA as a result of edge effect would be significant.

4.3.8.2 Significance of Impacts

Impacts to the MHPA as a result of edge effects would be significant.

4.3.8.3 Mitigation, Monitoring, and Reporting

Section 4.1.5, Land Use, specifies the mitigation measures for impacts addressing MHPA adjacency.

4.3.8.4 Significance of Impacts after Mitigation

Implementation of the mitigation measures outlined in Section 4.1.5.3, Land Use, would reduce potential MHPA adjacency impacts to a level that is less than significant.

4.3.9 Issue 7: Invasive Species

Would the project result in the introduction of invasive species of plants into a natural open space area?

4.3.9.1 Impacts

Invasive species are aggressive, non-native plant species that threaten natural habitats by outcompeting native species and reducing biodiversity. These plants thrive in areas disturbed by activities such as grading, construction, and off-road vehicle use or fire. Grading would disturb approximately 43.32 acres of the 53.38-acre project area. As such, the project may potentially result in impacts associated with invasive species.

The project includes a Conceptual Landscape Plan (see Figures 3-2a and 3-2b) which is incorporated into the project design to ensure that indirect effects due to invasive species would not occur. The plan provides a list of plant materials that would respond to a variety of locations, orientations, levels of refinement, land use transitions, and edge conditions.

The plan addresses special treatment with landscaping that reflects the native habitat present in the adjacent natural open space. Additionally, barriers would be constructed in the yards of those units adjacent to the MHPA to separate the landscaping from the open space area. Slopes that occur adjacent to areas of existing undisturbed vegetation would be planted with native plant species compatible with existing vegetation. This plan was prepared in accordance with established guidelines and the final plan would be in substantial conformance to conceptual plan.

4.3.9.2 Significance of Impacts

Potential impacts associated with invasive species may occur as a result of grading and construction due to project implementation. The landscape palette for the proposed slopes adjacent to the MHPA would include only native and low-fuel plant species. Therefore impacts related to invasive species would be less than significant.

4.3.9.3 Mitigation, Monitoring, and Reporting

Impacts would be less than significant. No mitigation is required.

4.4 Noise

The following section is based upon the noise technical report for the project prepared by RECON in August 2013 (Appendix F). This section evaluates potential impacts associated with project construction, future traffic noise on Pomerado Road, and aircraft noise from MCAS Miramar.

4.4.1 Existing Conditions

4.4.1.1 Existing Noise Standards

Impacts to future sensitive receivers were evaluated in relation to the noise level standards in the City General Plan (2008), the City's Significance Determination Thresholds for CEQA (2011), and the City Noise Abatement and Control Ordinance Section 95.5.0401. Noise standards in the City are expressed in the hourly equivalent sound level (L_{eq}), an average A-weighted decibel [dB(A)] sound level over a one-hour period, and the CNEL, a 24-hour dB(A) that accounts for frequency correction and the subjective response of humans to noise by adding 5 dB and 10 dB to the evening and nighttime hours, respectively.

a. Traffic Noise Standards

As discussed in Section 4.1, Land Use, exterior noise impacts to projects are evaluated in relation to consistency with General Plan land use noise compatibility guidelines. The City's exterior noise level standard for senior living use is 65 CNEL. Noise-sensitive residential interior spaces have an interior standard of 45 CNEL. The noise section of the City's Significance Determination Thresholds for CEQA (2011) indicates that for convalescent homes, exterior noise levels would be considered significant if future projected traffic would result in noise levels exceeding 65 CNEL at exterior usable areas or interior noise levels exceeding 45 CNEL.

Standard construction techniques typically provide a 15 dB reduction of exterior noise levels to an interior receiver. Standard construction could therefore be assumed to result in interior noise levels of 45 CNEL or less when exterior sources are 60 CNEL or less. When exterior noise levels are greater than 60 CNEL, consideration of specific construction techniques is required.

Interior noise levels for dwellings other than detached single-family dwellings are also regulated by Title 24 of the California Code of Regulations (CCR), California Noise Insulation Standards. Title 24, Chapter 12, Section 1207, of the California Building Code requires that interior noise levels, attributable to exterior sources, not exceed 45 CNEL in any habitable room within a residential structure. A habitable room in a building is used for living, sleeping, eating, or cooking. Bathrooms, closets, hallways, utility spaces, and similar areas are not considered habitable spaces. Additionally, acoustical studies must be prepared for proposed residential structures located where the noise level exceeds 60 CNEL. The studies must demonstrate that the design of the building would reduce interior noise to 45 CNEL in inhabitable rooms. If

compliance requires windows to be inoperable or closed, the structure must include ventilation or air-conditioning (24 CCR 1207 2010).

b. Stationary Noise Standards

The Noise Abatement and Control Ordinance specifies maximum one-hour average sound level limits at the boundary of a property. These maximum one-hour sound level limits are the maximum noise levels allowed at any point on or beyond the property boundaries due to activities occurring on the property. Where two or more zones adjoin, the sound level limit is the arithmetic mean of the respective limits for the two zones. Table 4.4-1 shows the exterior noise limits specified in the City's Noise Control Ordinance.

TABLE 4.4-1
EXTERIOR NOISE LIMITS

Receiving Land Use Category	Noise Level [dB(A)]		
	7:00 A.M. to 7:00 P.M.	7:00 P.M. to 10:00 P.M.	10:00 P.M. to 7:00 A.M.
Single Dwelling Unit Residential	50	45	40
Multi-dwelling Unit Residential (up to a maximum density of 1 dwelling unit/2000 square feet)	55	50	45
All Other Residential	60	55	50
Commercial	65	60	60
Industrial or Agricultural	75	75	75

c. Construction Noise Standards

Construction noise is regulated by the City's Municipal Code. Section 59.5.0404 of the Municipal Code, the City's Noise Abatement and Control Ordinance, states that:

- It shall be unlawful for any person, between the hours of 7:00 P.M. of any day and 7:00 A.M. of the following day, or on legal holidays as specified in Section 21.04 of the San Diego Municipal Code, with exception of Columbus Day and Washington's Birthday, or on Sundays, to erect, construct, demolish, excavate for, alter or repair any building or structure in such a manner as to create disturbing, excessive or offensive noise.

- [I]t shall be unlawful for any person, including the City of San Diego, to conduct any construction activity so as to cause, at or beyond the property lines of any property zoned residential, an average sound level greater than 75 decibels during the 12-hour period from 7:00 A.M. to 7:00 P.M.

4.4.1.2 Existing Ambient Noise

a. Existing Noise Level Measurements

Noise measurements were taken on the project site on Wednesday, July 18, 2012, to obtain existing ambient noise levels. A total of three 15-minute measurements were made on the project site, as described below. The locations of the measurements are shown on Figure 4.4-1. The primary source of on-site noise was due to traffic on Pomerado Road.

Measurement 1 was located at the northeast corner of the project site at 35 feet from the centerline of Pomerado Road. The main noise source at this location was vehicle traffic noise on Pomerado Road. The measurement was also located adjacent to Chabad Center Driveway; however, only one vehicle used this roadway during the measurement period and had a minor influence on the measurement. During the measurement period, traffic was moving freely on Pomerado Road at approximately 45 mph. Traffic volumes were counted, and the results are shown in Table 4.4-2. The average measured noise level during Measurement 1 was 71.4 dB(A) L_{eq}.

TABLE 4.4-2
15-MINUTE TRAFFIC COUNTS

	Cars	Motorcycles	Buses	Medium Trucks	Heavy Trucks
Eastbound Pomerado	171	2	0	1	1
Westbound Pomerado	163	1	1	1	0
TOTAL	**334**	**3**	**1**	**2**	**1**

Measurement 2 was taken at the western project boundary adjacent to the existing baseball field. Traffic on Pomerado Road was audible from the measurement location and was the main source of noise during the measurement period. The average measured noise level during Measurement 2 was 48.8 dB(A) L_{eq}.

Measurement 3 was taken east of Measurement 2 at the southern project boundary on a dirt trail. As with Measurement 2, traffic on Pomerado Road was audible at Measurement 3. Additionally, military aircraft taking off at MCAS Miramar could be heard. The average measured noise level during Measurement 3 was 51.0 dB(A) L_{eq}.

Image Source: SanGIS (flown May 2012)

0 Feet 350

Project Boundary

Noise Measurement Location

FIGURE 4.4-1

Noise Measurement Locations

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b. Existing Aircraft Noise

MCAS Miramar is located south of the project site. There are four runways that serve the airfield. The MCAS Miramar runways are approximately 2.5 miles southwest of the project site. Operational squadrons currently include FA/18 fighters, C-12 transport airframes, and rotary wing squadrons of CH-46 and CH-53 aircraft. Marine air operations include, but are not limited to, Seawolf and Julian departures, touch-and-gos, field carrier landing practice, and ground control approach box patterns for both fixed and rotary-wing aircraft.

Existing noise level contours for aircraft operations at MCAS Miramar are shown on Figure 4.1-6 (San Diego County Regional Airport Authority 2004). As shown, the project lies outside the 60 CNEL contour.

4.4.2 Significance Determination Thresholds

Based on the City's 2011 Significance Determination Thresholds, impacts related to noise would be significant if the project would:

1. Result in or create a significant increase in the existing ambient noise level;

2. Result in the exposure of people to noise levels which exceed the City's Noise Abatement and Control Ordinance;

4.4.3 Issue 1: Ambient Noise Level Increase

Would the project result in or create a significant increase in the existing ambient noise levels?

4.4.3.1 Impacts

Existing ambient noise levels in the project area are generated by traffic on area roadways, MCAS Miramar, and other noise associated with a given land use. The project would contribute traffic to area roadways, which would in turn increase the ambient noise level. Noise level changes greater than 3 dB, or a doubling of acoustic energy, are often identified as an audible change in the ambient noise environment, and an increase of this magnitude may be considered potentially significant in locations with existing high ambient noise levels. Therefore, for the purposes of this analysis, a direct and cumulative roadway noise impact would be considered significant if project implementation would expose on- or off-site, existing, and planned sensitive uses to road noise 3 dB over existing noise levels and the future noise level at the same noise sensitive land use is in excess of the land use noise compatibility standards of the General Plan.

Table 4.4-3 shows the existing traffic volumes with and without the project, the near-term traffic volumes with and without the project, the Year 2030 traffic volumes with and without the project, and the associated increases in noise levels.

TABLE 4.4-3
TRAFFIC VOLUMES AND NOISE INCREASES

Roadway	Segment	Existing ADT	Existing + Project ADT	Δ dB	Near-Term ADT	Near Term + Project ADT	Δ dB	Year 2030 ADT	Year 2030 + Project ADT	Δ dB	Existing to Buildout Δ dB
Miramar Road	I-15 SB Ramps to I-15 Northbound Ramps	41,208	42,449	0.1	41,723	42,964	0.1	45,000	46,241	0.1	0.5
Pomerado Road	I-15 NB Ramps to Willow Creek Road	27,827	29,181	0.2	27,938	29,292	0.2	36,000	37,354	0.2	1.3
	Willow Creek Road to Scripps Ranch Boulevard	22,038	23,410	0.3	22,119	23,491	0.3	30,000	31,372	0.2	1.5
	Scripps Ranch Boulevard to Chabad Center Driveway	22,199	23,703	0.3	22,260	23,764	0.3	28,000	29,504	0.2	1.2
	Chabad Center Driveway to Avenida Magnifica	21,847	22,223	0.1	21,908	22,284	0.1	28,000	28,376	0.1	1.1

As shown in Table 4.4-3, the increase in traffic noise levels between existing and future buildout traffic volumes would range from 0.5 to 1.5 dB. Additionally, noise increases in the Existing Plus Project, Near Term Plus Project, and Year 2030 Plus Project conditions would range from 0.1 to 0.3 dB. Noise increases due to the project in all conditions would be less than 3 dB. Therefore, the project would result in existing, near-term, and full buildout impacts that would be less than significant.

4.4.3.2 Significance of Impacts

Project related traffic noise increases would be less than 3 dB and would not be audible. Therefore, existing, near-term, and full buildout impacts would be less than significant. The project would not result in or create a significant increase in the existing ambient noise levels.

4.4.3.3 Mitigation, Monitoring, and Reporting

Impacts would be less than significant. No mitigation is required.

4.4.4 Issue 2: Noise Exposure

Would the project result in the exposure of people to noise levels which exceed the City's Noise Abatement and Control Ordinance?

4.4.4.1 Impacts

Sensitive receptors are located in the vicinity of the project. Single-family residential uses are located north of Pomerado Road, approximately 300 feet north of the project boundary. Military housing is located on Scripps Ranch Row south of Pomerado Road, approximately 100 feet west of the project boundary. Student housing and educational uses are located at Alliant International University adjacent to the western project boundary. The Chabad Center is located east of Chabad Center Driveway, adjacent to the eastern project boundary. These off-site sensitive receptors would be exposed to project-related traffic noise, on-site stationary noise, and construction noise.

a. Traffic Noise

The project would contribute traffic to area roadways. A significant impact would occur if project implementation would expose on- or off-site, existing, and planned sensitive uses to road noise 3 dB over existing noise levels. As discussed in Section 4.4.3, project-related traffic noise increases would be less than 3 dB, and would not be audible. Therefore, traffic noise at adjacent receptors would be less than significant.

b. Stationary Noise

Off-Site Receptors

Heating, ventilation, and air conditioning (HVAC) equipment could be a primary noise source associated with the project. HVAC equipment is often mounted on rooftops, located on the ground, or located within mechanical rooms. The noise sources could take the form of fans, pumps, air compressors, chillers, or cooling towers.

Emergency generators may be used to supply necessary power requirements to vital systems within the proposed health center. Emergency generators produce noise levels of approximately 82 dB(A) L_{eq} at 50 feet. Emergency generators are typically operated under two conditions: loss of main electrical supply, or preventive maintenance/testing. The emergency generator would be located in a room on the western side of the facilities building within an enclosed block wall screen. Masonry walls would reduce noise levels by at least 40 dB. The operation of mechanical equipment associated with emergency operations is exempt from the noise standards outlined in the Municipal Code; thus, noise generated by emergency generators is not compared to the limits shown in Table 4.1-1. Because the emergency generator would be located in a room shielded from adjacent uses and would only be used during emergencies and for routine maintenance/testing, noise would be less than significant.

In general, noise levels generated by building mechanical equipment typically average between 55 and 85 dB(A) L_{eq} at 3 feet (Bolt, Beranek, and Newman 1971). Mechanical equipment is typically shielded from direct public exposure and usually housed on rooftops, within equipment rooms, or within exterior enclosures.

The facilities building, health center, garden terrace, and independent living uses would include mechanical equipment on the rooftops. The general locations of the equipment are shown in Figure 4.4-2. Depending on the placement and type of equipment used, the operation of mechanical equipment could result in noise impacts on the adjacent residential uses north of Pomerado Road and west on Scripps Ranch Row, student housing on the Alliant University campus, and school uses at the Chabad Center to the east.

For this reason, a worst-case analysis was conducted to determine the level of noise impacts. Because no equipment specifications have been developed for the project, a typical noise level of 85 dB(A) L_{eq} at 3 feet was used to model each noise source location. Noise levels were modeled at the multi-family residential uses to the west on Scripps Ranch Row, the student housing on the Alliant University Campus, and the Chabad Center to the east. Receiver locations are shown in Figure 4.4-2. Noise levels were calculated based on an attenuation of 6 dB(A) per doubling of distance. Calculations were completed with flat site conditions and did not take into account shielding provided by proposed buildings, rooftop parapets, or equipment enclosures. These therefore represent typical worst-case noise levels.

Image Source: Microsoft (flown May 2010)

Project Boundary

Off-Site Modeled Receivers

Stationary Noise Source

0 Feet 300

FIGURE 4.4-2

Stationary Noise Locations and Modeled Receivers

RECON

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Table 4.4-4 summarizes the mechanical equipment noise levels. As shown, noise levels are not projected to exceed the applicable Noise Abatement and Control Ordinance limits. Therefore, impacts would be less than significant.

On-Site Receptors

As discussed, emergency generators would operate when there is a loss of main electrical supply or for periodic maintenance and testing. The emergency generators would be located within an enclosed block wall screen on the western side of the facilities building. Therefore, emergency generator noise levels to on-site sensitive receptors would not be significant.

The facilities building, health center, garden terrace, and independent living uses would include mechanical equipment on the rooftops. As a part of standard building design, the health center would include a curtain wall system with dual-glazed windows, acoustical tile ceilings, and a mechanical ventilation system. The rooftop mechanical equipment would be mounted on concrete pads, and below these roofs would be suspended ceilings with either acoustical tile or gypsum board. These assemblies would attenuate the exterior airborne noise by more than 50 dB. With the sound attenuation provided by the mechanical equipment pads, roof, and ceiling assemblies, the interior noise level would be less than significant.

c. Construction Noise

Noise associated with the earthwork, excavation, construction, and surface preparation for the project would result in short-term impacts to adjacent residential properties. A variety of noise-generating equipment would be used during the construction phase of the project, such as scrapers, dump trucks, backhoes, front-end loaders, jackhammers, and concrete mixers, along with others.

Table 4.4-5 indicates the types of construction equipment typically involved in construction projects. This type of equipment can individually generate noise levels that range between 78 and 91 dB(A) at 50 feet from the source, as listed in Table 4.4-5. Ground-clearing activities generally generate the greatest average construction noise levels. Ground-clearing activities are estimated to generate average noise levels of 83 to 84 dB(A) L_{eq} 50 feet from the site of construction (Bolt, Beranek, and Newman, Inc. 1971). These values are based on empirical data on a number and types of equipment at a construction site and their average cycle of operation.

TABLE 4.4-4
MECHANICAL EQUIPMENT NOISE LEVELS

	Mechanical Equipment Noise Source									Noise Abatement and Control Ordinance Limit		
Receiver	Facilities Building (#1)	Health Care 1 (#2)	Health Care 2 (#3)	Garden Terrace (#4)	Independent Living 1 (#5)	Independent Living 2 (#6)	Independent Living 3 (#7)	Independent Living 4 (#8)	Total	Daytime	Evening	Nighttime
1	34	34	34	36	34	31	33	33	43	55	50	45
2	35	32	33	41	39	34	35	35	45	60	55	50
3	35	32	33	41	41	35	35	36	46	60	55	50
4	34	31	32	39	39	35	34	36	45	60	55	50
5	33	30	31	36	38	34	33	35	43	60	55	50
6	44	40	44	36	37	39	44	40	50	65	60	60
7	44	42	48	36	36	37	43	39	51	65	60	60

TABLE 4.4-5
MEASURED NOISE LEVELS OF
COMMON CONSTRUCTION EQUIPMENT

Equipment	Approximate Noise Level [dB(A)]
Air compressor	81
Backhoe	85
Concrete mixer	85
Dozer	80
Generator	78
Grader	85
Jackhammer	88
Loader	79
Paver	89
Pneumatic tool	86
Saw	78
Scraper	88
Truck	91

SOURCE: Bolt, Beranek, and Newman 1971.
NOTE: Noise levels at 50 feet from the source.

Construction noise generally can be treated as a point source and would attenuate at approximately 6 dB(A) for every doubling of distance. Construction activities, such as grading, generate the loudest noise levels. A grading noise level of 84 dB(A) L_{eq} at 50 feet would attenuate to approximately 75 dB(A) L_{eq} at 140 feet from the noise source.

The Noise Abatement and Control Ordinance states that ". . . it shall be unlawful for any person, including the City of San Diego, to conduct any construction activity so as to cause, at or beyond the property lines of any property zoned residential, an average sound level greater than 75 decibels during the 12-hour period from 7:00 A.M. to 7:00 P.M."

As discussed above, there are residential uses to the north and northwest of the project site. The single-family residential units are located more than 700 feet north of the limits of grading/construction, and the military housing is located more than 200 feet west of the limits of grading/construction. Because these residential uses are further than 140 feet from the limits of grading/construction, construction noise levels are not anticipated to exceed 75 dB(A)L_{eq}. Construction noise impacts would be less than significant. Furthermore, hours of construction would be limited by the City's Noise Abatement and Control Ordinance, as detailed in Section 4.4.1.1(c).

4.4.4.2 Significance of Impacts

a. Traffic Noise

Project-related traffic noise increases would be less than 3 dB, and would not be audible to off-site residents. Therefore, traffic noise at adjacent receptors would be less than significant.

b. Stationary Noise

Noise levels at off-site receptors are not projected to exceed the applicable Noise Abatement and Control Ordinance limits. Additionally, with the sound attenuation provided by the mechanical equipment pads, roof, and ceiling assemblies, the noise levels at on-site sensitive receptors would be less than significant. Therefore, impacts would be less than significant.

c. Construction Noise

Construction noise levels are not projected to exceed 75 dB(A) L_{eq} beyond the project site boundaries. The project would comply with construction time limits as required by the City's Noise Abatement and Control Ordinance. Therefore, construction noise impacts would be less than significant.

4.4.4.3 Mitigation, Monitoring, and Reporting

Impacts would be less than significant. No mitigation is required.

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4.5 Historical Resources

RECON conducted an historical resource survey of the project site in July 2012. The survey consisted of a review of all relevant site records and reports on file, as well as an intensive on-foot survey of the project site. An addendum to the historical resources report was prepared in January 2015 to address subsequent changes to the proposed grading plan. The historical resources report and addendum are included as Appendix G and summarized below.

4.5.1 Existing Conditions

4.5.1.1 Known Prehistoric/Historic Resources

a. Cultural Setting

The prehistoric cultural sequence in San Diego County is generally composed of three basic periods: the Paleoindian, dating between about 11,500 and 8,500 years ago; the Archaic, lasting from about 8,500 to 1,500 years ago (A.D. 500); and the Late Prehistoric, lasting from about 1,500 years ago to historic contact (i.e., A.D. 500 to 1769).

The Paleoindian period in San Diego County is manifested by the artifacts of the San Dieguito Complex, which consists of well-made scraper planes, choppers, scraping tools, crescentics, elongated bifacial knives, and leaf-shaped points. The San Dieguito Complex is thought to represent an early emphasis on hunting.

The Archaic period is manifested by the cobble and core technology of the La Jollan Complex, and reflects a shift toward a more generalized economy and an increased emphasis on seed resources, small game, and shellfish. Along with an economic focus on gathering plant resources, the settlement system appears to have been fairly sedentary. The La Jollan Complex is dominated by rough, cobble-based choppers and scrapers, and slab and basin metates. Large deposits of marine shell at coastal sites suggest the importance of shellfish gathering to the coastal Archaic economy.

The Late Prehistoric period in San Diego County is represented by the Cuyamaca Complex and patterns that suggest the emergence of the enthohistoric Kumeyaay. This period is marked by the appearance of ceramics, small arrow points, and cremation burial practices, as well as by higher population densities and elaborations in social, political, and technological systems. Economic systems diversify and intensify during this period, with the continued elaboration of trade networks, the use of shell-bead currency, and the appearance of more labor-intensive, but effective technological innovations.

The Kumeyaay occupied the southern two-thirds of San Diego County and lived in semi-sedentary, politically autonomous villages or rancherias. The most basic social and economic unit was the patrilocal extended family. Their economic system consisted of hunting and

gathering, with a focus on small game, acorns, grass seeds, and other plant resources. A wide range of tools was made of locally available and imported materials such as obsidian. Ground stone objects of the Kumeyaay included mortars and pestles typically made of locally available, fine-grained granite. The Kumeyaay also made fine baskets that employed either coiled or twined construction. The Kumeyaay also made pottery. Most were a plain brown utility ware called Tizon Brownware, but some were decorated.

A period of historic contact began in San Diego County in the mid-1700s, beginning with the Spanish (1769–1821), followed by the Mexican (1822–1848) and American (starting mid-1800s) homestead systems. One of the hallmarks of the Spanish colonial period was the rancho system. In an attempt to encourage settlement and development of the colonies, large land grants were made by the Spanish to meritorious or well-connected individuals.

During the Mexican colonial period, the mission system was secularized by the Mexican government and these lands allowed for the dramatic expansion of the rancho system. The local economy became increasingly based on cattle ranching. The Mexican period ended when Mexico signed the Treaty of Guadalupe Hidalgo in 1848, concluding the Mexican-American War. The great influx of Americans and Europeans resulting from the California Gold Rush in 1848-49 eliminated many remaining vestiges of Native American culture.

The American homestead system encouraged settlement beyond the coastal plain into areas where Indians had retreated to avoid the worst of Spanish and Mexican influences (Carrico 1987; Cook 1976). A rural community cultural pattern existed in San Diego County from approximately 1870 to 1930. These communities were composed of an aggregate of people who lived within well-defined geographic boundaries, on farmsteads tied together through a common school district, church, post office, and country store (Hector and Van Wormer 1986). In the post-World War II period, the economy shifted from ranching and agriculture to light manufacturing, the military, and tourism.

b. Records Search

Record searches were conducted through the South Coastal Information Center at San Diego State University in order to determine if previously recorded prehistoric or historic cultural resources occur on the project site. Historic aerial photographs were also checked for past development within and near the project site.

The record searches indicate no previously recorded prehistoric or historic cultural resources are present on the project site. The closest recorded cultural resource is CA-SDI-8870, a historic period site composed of three features located approximately 65 meters west of the project site in Carroll Canyon. The features consist of a concrete dam, a concrete machinery foundation, and a round brick reservoir. The site was dated to the early 1900s. CA-SDI-8870 was recorded in 1981, and destroyed by the residential development immediately west of the project site.

The next closest recorded resource is P-37-013705, an isolate consisting of a quartzite flake and core. The isolate was recorded in 1992, and is located approximately 40 meters east of the southeast corner of the project site.

c. Field Inspection

The survey area consisted of the entire project site except for a canyon in the middle that has been obviously filled. Transect spacing averaged 12 to 15 meters, except in the two eucalyptus groves in the northwest and south-central areas. Ground cover consisting of leaves and bark also totally obscured the ground in these two areas, and spacing averaged 20 to 25 meters.

No cultural material was found during the survey of the project site. This is due in large part to the terrain consisting of slopes that are too steep for human occupation. Also, the previous cut and fill has disturbed the surface.

4.5.2 Significance Determination Thresholds

4.5.2.1 Evaluation of Cultural Resource Significance

Federal, state, and local criteria are used to evaluate the significance of a prehistoric or historic resource.

Federal criteria are those used to determine eligibility for the National Register of Historic Places (NRHP). These criteria state that the quality of significance in American history, architecture, archaeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling and association, and:

A. Are associated with events that have made a significant contribution to the broad patterns of our history; or

B. Are associated with the lives of persons significant in our past; or

C. Embody the distinctive characteristics of a type, period, or method of construction; or that represent the work of a master; or that possess high artistic values; or that

D. Have yielded, or may be likely to yield, information important in prehistory or history.

State criteria are those listed in CEQA and used to determine whether a historic resource qualifies for the California Register of Historic Resources (CRHR). According to the CEQA Guidelines Section 15064.5 and Appendix G, adoption and implementation of the project would result in a significant adverse cultural resources impact if the project would:

A. Cause a substantial adverse change in the significance of a historical architectural resource that is listed on, or determined to be eligible for listing on, the NRHP or the

CRHR; is listed on or determined to be eligible for listing on the San Diego List of Historic Sites; or that meets any of the following criteria:

- o Is associated with events that have made a significant contribution to the broad patterns of history at the local, regional, state, or national level;
- o Is associated with the lives of significant persons in the past on a local, regional, state or national level;
- o Embodies the distinctive characteristics of a type, period, or method of construction, or represents the work of a master, or possesses high artistic values; or
- o Has yielded, or may be likely to yield, information important in history or prehistory; or

B. Cause a substantial adverse change in the significance of an important archaeological resource or disturb any human remains, including those interred outside of formal cemeteries.

City criteria include all properties (historic, archaeological, landscapes, traditional, etc.) that are eligible or potentially eligible for the NRHP; those properties that may be significant under state and local laws and registration programs, such as the CRHR and the City Historical Resources Register. Any improvement, building, structure, sign, interior element and fixture, site, place, district, area or object may be designated as historic by the City Historical Resources Board if it meets any of the following criteria:

A. Exemplifies or reflects special elements of the City's, a community's, or a neighborhood's historical, archaeological, cultural, social, economic, political, aesthetic, engineering, landscaping, or architectural development;

B. Is identified with persons or events significant in local, state, or national history;

C. Embodies distinctive characteristics of a style, type, period, or method of construction or is a valuable example of the use of indigenous materials or craftsmanship;

D. Is representative of the notable work of a master builder, designer, architect, engineer, landscape architect, interior designer, artist, or craftsman;

E. Is listed on or has been determined eligible by the National Park Service for listing on the NRHP or is listed or has been determined eligible by the California Office of Historic Preservation for listing on the State Register of Historical Resources; or

F. Is a finite group of resources related to one another in a clearly distinguishable way; or is a geographically definable area or neighborhood containing improvements which have a

special character, historical interest or aesthetic value; or which represent one or more architectural periods or styles in the history and development of the city.

If a resource is not listed in, or determined eligible for listing in, the California Register, not included in a local register, or not deemed significant in a historical resource survey, City criteria states that it may nonetheless be historically significant. The significance of a historical resource in this case would be based on the potential for the resource to meet one or more of the criteria presented above, including the potential to address important research questions as documented in a site specific technical reported.

As a baseline, the City has established the following criteria to be used in the determination of significance under CEQA.

- An archaeological site must consist of at least three associated artifacts/ecofacts (within a 40-square-meter area) or a single feature. Archaeological sites containing only a surface component are generally considered not significant, unless otherwise demonstrated. Testing is required to document the absence of subsurface deposit. The determination of significance is based on a number of factors specific to a particular site, including site size, type, and integrity; presence or absence of a subsurface deposit, soil stratigraphy, features, diagnostics, and datable material; artifact and ecofact density; assemblage complexity; cultural affiliation; association with an important person or event; and ethnic importance.

4.5.2.2 Determination of Impact Significance

Based on the City's 2011 Significance Determination Thresholds, impacts related to historical resources would be significant if the project would:

1. Result in the alteration, including the adverse physical or aesthetic effects and/or destruction of a prehistoric or historic building (including an architecturally significant building), structure, object, or site;

2. Result in any impact to existing religious or sacred uses within the potential impact area;

3. Result in the disturbance on any human remains, including those interred outside of formal cemeteries.

4.5.3 Issue 1: Prehistoric/Historic Resources

Would the project result in the alteration, including the adverse physical or aesthetic effects and/or the destruction of a prehistoric or historic building (including an architecturally significant building), structure, or object or site?

4.5.3.1 Impacts

Approximately 43 acres of the 53-acre project site would be disturbed as a result of the project. The records search and field survey identified no prehistoric or historic cultural material on the project site. There are no historic buildings or structures on the project site and the possibility of significant historical resources being present is considered very low as portions of the property have been heavily impacted by previous grading. Most of the remainder of the project site is too steep for the presence of potentially significant cultural resources.

A small portion of the Carroll Canyon floodplain would be impacted by construction of the detention basin and a fill slope. There is potential for significant subsurface cultural deposits in this area (Figure 4.5-1).

4.5.3.2 Significance of Impacts

The field survey found no prehistoric or historic cultural material on the project site. However, there is potential for significant subsurface cultural deposits in a small portion of the Carroll Canyon floodplain. If present, grading would uncover and destroy these subsurface resources, thereby resulting in a significant impact.

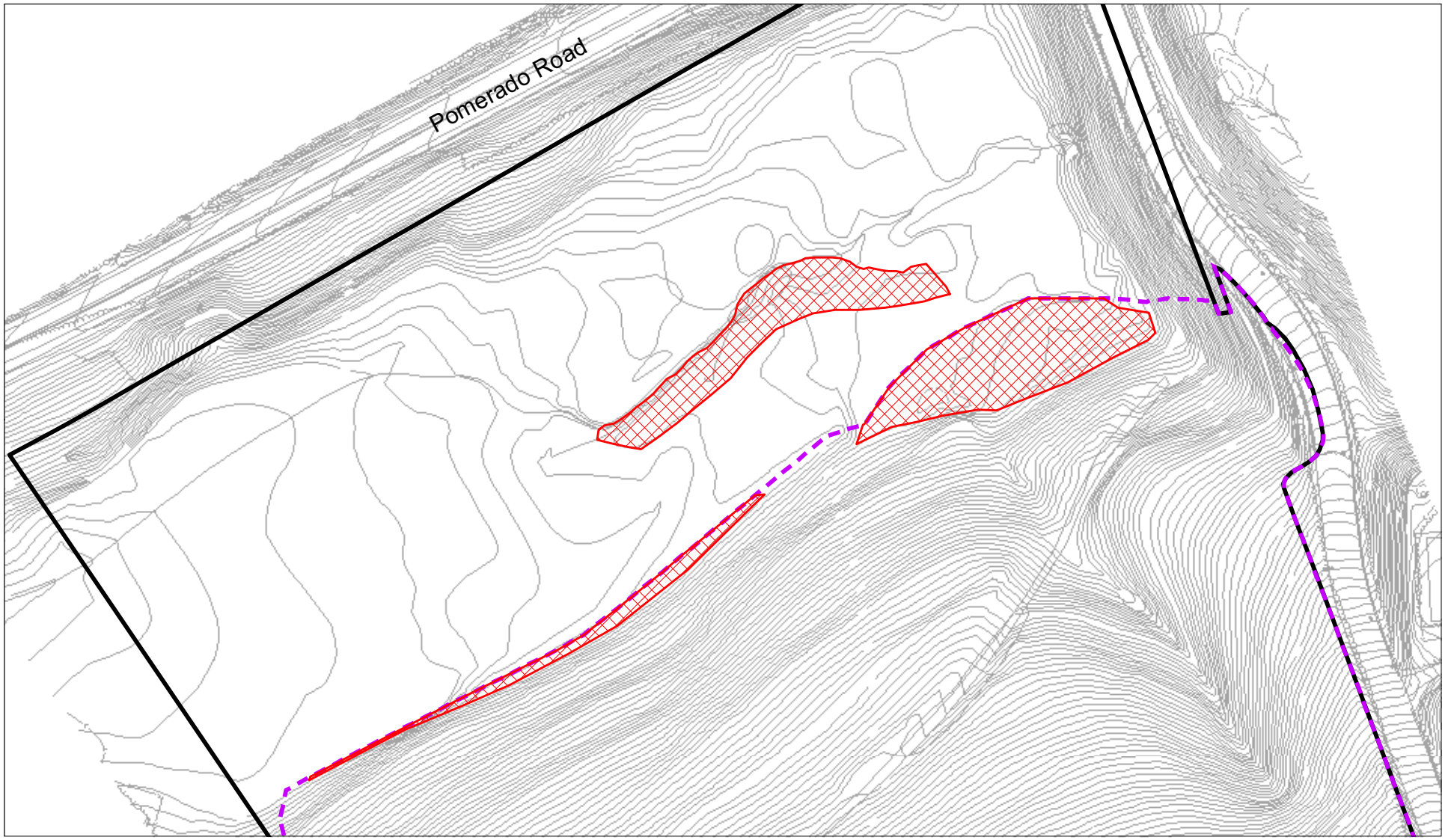

FIGURE 4.5-1

Areas Recommended for Monitoring During Construction

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4.5.3.3 Mitigation, Monitoring, and Reporting

HIST-1:

I. Prior to Permit Issuance

A. Entitlements Plan Check

1. Prior to issuance of any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits or a Notice to Proceed for Subdivisions, but prior to the first preconstruction meeting, whichever is applicable, the ADD Environmental designee shall verify that the requirements for Archaeological Monitoring and Native American monitoring have been noted on the applicable construction documents through the plan check process.

B. Letters of Qualification have been submitted to ADD

1. The applicant shall submit a letter of verification to MMC identifying the Principal Investigator (PI) for the project and the names of all persons involved in the archaeological monitoring program, as defined in the City of San Diego Historical Resources Guidelines (HRG). If applicable, individuals involved in the archaeological monitoring program must have completed the 40-hour HAZWOPER training with certification documentation.

2. MMC will provide a letter to the applicant confirming the qualifications of the PI and all persons involved in the archaeological monitoring of the project meet the qualifications established in the HRG.

3. Prior to the start of work, the applicant must obtain written approval from MMC for any personnel changes associated with the monitoring program.

II. Prior to Start of Construction

A. Verification of Records Search

1. The PI shall provide verification to MMC that a site specific records search (¼-mile radius) has been completed. Verification includes, but is not limited to a copy of a confirmation letter from South Coastal Information Center, or, if the search was in-house, a letter of verification from the PI stating that the search was completed.

2. The letter shall introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities.

3. The PI may submit a detailed letter to MMC requesting a reduction to the ¼-mile radius.

B. PI Shall Attend Precon Meetings

1. Prior to beginning any work that requires monitoring; the Applicant shall arrange a Precon Meeting that shall include the PI, Native American consultant/monitor (where Native American resources may be impacted), Construction Manager (CM) and/or Grading Contractor, RE, Building Inspector (BI), if appropriate, and MMC. The qualified Archaeologist and Native American Monitor shall attend any grading/excavation related Precon Meetings to make comments and/or suggestions concerning the Archaeological Monitoring program with the Construction Manager and/or Grading Contractor.

    a. If the PI is unable to attend the Precon Meeting, the Applicant shall schedule a focused Precon Meeting with MMC, the PI, RE, CM or BI, if appropriate, prior to the start of any work that requires monitoring.

2. Identify Areas to be Monitored

    a. Prior to the start of any work that requires monitoring, the PI shall submit an Archaeological Monitoring Exhibit (AME) (with verification that the AME has been reviewed and approved by the Native American consultant/monitor when Native American resources may be impacted) based on the appropriate construction documents (reduced to 11x17) to MMC identifying the areas to be monitored including the delineation of grading/excavation limits.

    b. The AME shall be based on the results of a site specific records search as well as information regarding existing known soil conditions (native or formation).

3. When Monitoring Will Occur

    a. Prior to the start of any work, the PI shall also submit a construction schedule to MMC through the RE indicating when and where monitoring will occur.

    b. The PI may submit a detailed letter to MMC prior to the start of work or during construction requesting a modification to the monitoring program. This request shall be based on relevant information such as review of final construction documents which indicate site conditions such as depth of excavation and/or site graded to bedrock, etc., which may reduce or increase the potential for resources to be present.

III. During Construction

A. Monitor(s) Shall be Present During Grading/Excavation/Trenching

1. The Archaeological Monitor shall be present full-time during all soil disturbing and grading/excavation/trenching activities which could result in impacts to archaeological resources as identified on the AME. **The CM is responsible for notifying the RE, PI, and MMC of changes to any construction activities such as in the case of a potential safety concern within the area being monitored. In certain circumstances Occupational Safety and Health Administration (OSHA) safety requirements may necessitate modification of the AME.**

2. The Native American consultant/monitor shall determine the extent of their presence during soil disturbing and grading/excavation/trenching activities based on the AME and provide that information to the PI and MMC. If prehistoric resources are encountered during the Native American consultant/monitor's absence, work shall stop and the Discovery Notification Process detailed in Section III.B–C and IV.A–D shall commence.

3. The PI may submit a detailed letter to MMC during construction requesting a modification to the monitoring program when a field condition such as modern disturbance post-dating the previous grading/trenching activities, presence of fossil formations, or when native soils are encountered that may reduce or increase the potential for resources to be present.

4. The archaeological and Native American consultant/monitor shall document field activity via the Consultant Site Visit Record (CSVR). The CSVRs shall be faxed by the CM to the RE the first day of monitoring, the last day of monitoring, monthly (**Notification of Monitoring Completion)**, and in the case of ANY discoveries. The RE shall forward copies to MMC.

B. Discovery Notification Process

1. In the event of a discovery, the Archaeological Monitor shall direct the contractor to temporarily divert all soil disturbing activities, including but not limited to digging, trenching, excavating or grading activities in the area of discovery and in the area reasonably suspected to overlay adjacent resources and immediately notify the RE or BI, as appropriate.

2. The Monitor shall immediately notify the PI (unless Monitor is the PI) of the discovery.

3. The PI shall immediately notify MMC by phone of the discovery, and shall also submit written documentation to MMC within 24 hours by fax or email with photos of the resource in context, if possible.

4. No soil shall be exported off-site until a determination can be made regarding the significance of the resource specifically if Native American resources are encountered.

C. Determination of Significance

1. The PI and Native American consultant/monitor, where Native American resources are discovered shall evaluate the significance of the resource. If Human Remains are involved, follow protocol in Section IV below.

   a. The PI shall immediately notify MMC by phone to discuss significance determination and shall also submit a letter to MMC indicating whether additional mitigation is required.

   b. If the resource is significant, the PI shall submit an Archaeological Data Recovery Program (ADRP) which has been reviewed by the Native American consultant/monitor, and obtain written approval from MMC. Impacts to significant resources must be mitigated before ground disturbing activities in the area of discovery will be allowed to resume. **Note: If a unique archaeological site is also an historical resource as defined in CEQA, then the limits on the amount(s) that a project applicant may be required to pay to cover mitigation costs as indicated in CEQA Section 21083.2 shall not apply.**

   c. If the resource is not significant, the PI shall submit a letter to MMC indicating that artifacts will be collected, curated, and documented in the Final Monitoring Report. The letter shall also indicate that that no further work is required.

IV. Discovery of Human Remains

If human remains are discovered, work shall halt in that area and no soil shall be exported off-site until a determination can be made regarding the provenance of the human remains; and the following procedures as set forth in CEQA Section 15064.5(e), the California Public Resources Code (Sec. 5097.98) and State Health and Safety Code (Sec. 7050.5) shall be undertaken:

A. Notification

1. Archaeological Monitor shall notify the RE or BI as appropriate, MMC, and the PI, if the Monitor is not qualified as a PI. MMC will notify the appropriate Senior

Planner in the EAS of the Development Services Department to assist with the discovery notification process.

2. The PI shall notify the Medical Examiner after consultation with the RE, either in person or via telephone.

B. Isolate discovery site

1. Work shall be directed away from the location of the discovery and any nearby area reasonably suspected to overlay adjacent human remains until a determination can be made by the Medical Examiner in consultation with the PI concerning the provenance of the remains.

2. The Medical Examiner, in consultation with the PI, will determine the need for a field examination to determine the provenance.

3. If a field examination is not warranted, the Medical Examiner will determine with input from the PI, if the remains are or are not most likely to be of Native American origin.

C. If Human Remains **ARE** determined to be Native American

1. The Medical Examiner will notify the Native American Heritage Commission (NAHC) within 24 hours. By law, **ONLY** the Medical Examiner can make this call.

2. NAHC will immediately identify the person or persons determined to be the Most Likely Descendent (MLD) and provide contact information.

3. The MLD will contact the PI within 24 hours or sooner after the Medical Examiner has completed coordination, to begin the consultation process in accordance with CEQA Section 15064.5(e), the California Public Resources and Health & Safety Codes.

4. The MLD will have 48 hours to make recommendations to the property owner or representative, for the treatment or disposition with proper dignity, of the human remains and associated grave goods.

5. Disposition of Native American Human Remains will be determined between the MLD and the PI, and, if:

   a. The NAHC is unable to identify the MLD, OR the MLD failed to make a recommendation within 48 hours after being notified by the Commission; OR;

b. The landowner or authorized representative rejects the recommendation of the MLD and mediation in accordance with PRC 5097.94 (k) by the NAHC fails to provide measures acceptable to the landowner, THEN,

c. In order to protect these sites, the Landowner shall do one or more of the following:

(1) Record the site with the NAHC;

(2) Record an open space or conservation easement on the site;

(3) Record a document with the County.

d. Upon the discovery of multiple Native American human remains during a ground disturbing land development activity, the landowner may agree that additional conferral with descendants is necessary to consider culturally appropriate treatment of multiple Native American human remains. Culturally appropriate treatment of such a discovery may be ascertained from review of the site utilizing cultural and archaeological standards. Where the parties are unable to agree on the appropriate treatment measures the human remains and buried with Native American human remains shall be reinterred with appropriate dignity, pursuant to Section 5.c., above.

D. If Human Remains are **NOT** Native American

1. The PI shall contact the Medical Examiner and notify them of the historic era context of the burial.

2. The Medical Examiner will determine the appropriate course of action with the PI and City staff (PRC 5097.98).

3. If the remains are of historic origin, they shall be appropriately removed and conveyed to the San Diego Museum of Man for analysis. The decision for internment of the human remains shall be made in consultation with MMC, EAS, the applicant/landowner, any known descendant group, and the San Diego Museum of Man.

V. Night and/or Weekend Work

A. If night and/or weekend work is included in the contract

1. When night and/or weekend work is included in the contract package, the extent and timing shall be presented and discussed at the Precon Meeting.

2. The following procedures shall be followed.

a. No Discoveries

In the event that no discoveries were encountered during night and/or weekend work, the PI shall record the information on the CSVR and submit to MMC via fax by 8 A.M. of the next business day.

b. Discoveries

All discoveries shall be processed and documented using the existing procedures detailed in Sections III - During Construction, and IV – Discovery of Human Remains. Discovery of human remains shall always be treated as a significant discovery.

c. Potentially Significant Discoveries

If the PI determines that a potentially significant discovery has been made, the procedures detailed under Section III - During Construction and IV – Discovery of Human Remains shall be followed.

d. The PI shall immediately contact MMC, or by 8 A.M. of the next business day to report and discuss the findings as indicated in Section III-B, unless other specific arrangements have been made.

B. If night and/or weekend work becomes necessary during the course of construction

1. The Construction Manager shall notify the RE, or BI, as appropriate, a minimum of 24 hours before the work is to begin.

2. The RE, or BI, as appropriate, shall notify MMC immediately.

C. All other procedures described above shall apply, as appropriate.

VI. Post Construction

A. Preparation and Submittal of Draft Monitoring Report

1. The PI shall submit two copies of the Draft Monitoring Report (even if negative), prepared in accordance with the Historical Resources Guidelines (Appendix C/D) which describes the results, analysis, and conclusions of all phases of the Archaeological Monitoring Program (with appropriate graphics) to MMC for review and approval within 90 days following the completion of monitoring. **It should be noted that if the PI is unable to submit the Draft Monitoring Report within the allotted 90-day timeframe resulting from delays with analysis, special study results or other complex issues, a schedule shall be**

submitted to MMC establishing agreed due dates and the provision for submittal of monthly status reports until this measure can be met.

a. For significant archaeological resources encountered during monitoring, the Archaeological Data Recovery Program shall be included in the Draft Monitoring Report.

b. Recording Sites with State of California Department of Parks and Recreation

The PI shall be responsible for recording (on the appropriate State of California Department of Park and Recreation forms—DPR 523 A/B) any significant or potentially significant resources encountered during the Archaeological Monitoring Program in accordance with the City's Historical Resources Guidelines, and submittal of such forms to the South Coastal Information Center with the Final Monitoring Report.

2. MMC shall return the Draft Monitoring Report to the PI for revision or, for preparation of the Final Report.

3. The PI shall submit revised Draft Monitoring Report to MMC for approval.

4. MMC shall provide written verification to the PI of the approved report.

5. MMC shall notify the RE or BI, as appropriate, of receipt of all Draft Monitoring Report submittals and approvals.

B. Handling of Artifacts

1. The PI shall be responsible for ensuring that all cultural remains collected are cleaned and catalogued

2. The PI shall be responsible for ensuring that all artifacts are analyzed to identify function and chronology as they relate to the history of the area; that faunal material is identified as to species; and that specialty studies are completed, as appropriate.

3. The cost for curation is the responsibility of the property owner.

C. Curation of artifacts: Accession Agreement and Acceptance Verification

1. The PI shall be responsible for ensuring that all artifacts associated with the survey, testing and/or data recovery for this project are permanently curated with an appropriate institution. This shall be completed in consultation with MMC and the Native American representative, as applicable.

2. The PI shall include the Acceptance Verification from the curation institution in the Final Monitoring Report submitted to the RE or BI and MMC.

3. When applicable to the situation, the PI shall include written verification from the Native American consultant/monitor indicating that Native American resources were treated in accordance with state law and/or applicable agreements. If the resources were reinterred, verification shall be provided to show what protective measures were taken to ensure no further disturbance occurs in accordance with Section IV – Discovery of Human Remains, Subsection 5.

D. Final Monitoring Report(s)

1. The PI shall submit one copy of the approved Final Monitoring Report to the RE or BI as appropriate, and one copy to MMC (even if negative), within 90 days after notification from MMC that the draft report has been approved.

2. The RE shall, in no case, issue the Notice of Completion and/or release of the Performance Bond for grading until receiving a copy of the approved Final Monitoring Report from MMC which includes the Acceptance Verification from the curation institution.

4.5.3.4 Significance of Impacts after Mitigation

Implementation of the mitigation measure outlined above would reduce impacts to a level that is less than significant.

4.5.4 Issue 2: Religious/Sacred Uses

Would the project result in any impact to existing religious or sacred uses within the potential impact area?

4.5.4.1 Impacts

There are no known religious or sacred uses on-site or within the immediate vicinity of the project site. Therefore, implementation of the project would have no impacts to religious and sacred uses.

4.5.4.2 Significance of Impacts

Since no religious or sacred uses were identified within the project area, project development would result in less than significant impacts.

4.5.4.3 Mitigation, Monitoring, and Reporting

Impacts would be less than significant. No mitigation is required.

4.5.5 Issue 3: Human Remains

Would the project result in the disturbance of any human remains, including those interred outside of formal cemeteries?

4.5.5.1 Impacts

Since there are no known burial sites or cemeteries within the vicinity of the project area, it is not expected that human remains would be disturbed as a result of the project, and impacts would be less than significant. In the unlikely event of the discovery of human remains during project grading, work shall halt in that area and the procedures set forth in the California Public Resources Code (Sec. 5097.98) and State Health and Safety Code (Sec. 7050.5) shall be undertaken, as required in Section 4.5.3.3, Mitigation Measure above.

4.5.5.2 Significance of Impacts

Since there are no known human remains on the project site and measures are in place in the unlikely event that remains are found, impacts would be less than significant.

4.5.5.3 Mitigation, Monitoring, and Reporting

Impacts would be less than significant. No mitigation is required.

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4.6 Paleontological Resources

4.6.1 Existing Conditions

Paleontological resources represent a limited, nonrenewable, and impact-sensitive scientific and educational resource. Paleontological resources are the remains and/or traces of prehistoric plant and animal life exclusive of man. Fossil remains such as bones, teeth, shells, and leaves are found in the geologic deposits where they were originally buried. Paleontological resources include not only the actual fossil remains, but also the collecting localities, and the geologic formations containing those localities.

Paleontological resource sensitivities are rated for individual formations and recognize the important relationship between fossils and the geologic formations within which they are entombed. Geologic formations are rated for paleontological resource potential according to the following scale (Deméré and Walsh 1994).

- High Sensitivity - These formations contain a large number of known fossil localities. Generally, highly sensitive formations produce vertebrate fossil remains or are considered to have the potential to produce such remains.

- Moderate Sensitivity - These formations have a moderate number of known fossil localities. Generally, moderately sensitive formations produce invertebrate fossil remains in high abundance or vertebrate fossil remains in low abundance.

- Low and/or Unknown Sensitivity - These formations contain only a small number of known fossil localities and typically produce invertebrate fossil remains in low abundance. Unknown sensitivity is assigned to formations from which there are presently no known paleontological resources, but which have the potential for producing such remains based on their sedimentary origin.

- Very Low Sensitivity - Very low sensitivity is assigned to geologic formations that, based on their relative youthful age and/or high-energy depositional history, are judged to be unlikely to produce any fossil remains.

According to the geotechnical investigation (see Appendix H), the project site is underlain by Eocene-age Mission Valley Formation, Stadium Conglomerate, and Pomerado Conglomerate. The paleontological resource potential of these underlying formations is as follows (City of San Diego 2011):

- Mission Valley Formation High Sensitivity

- Stadium Conglomerate High Sensitivity

- Pomerado Conglomerate High Sensitivity

4.6.2 Significance Determination Thresholds

Based on the City's 2011 Significance Determination Thresholds, paleontological resource impacts would be considered significant if the project would:

1. Require over 1,000 cubic yards of excavation in a high resource potential geologic deposit/formation/rock unit;

2. Require over 2,000 cubic yards of excavation in a moderate resource potential geologic deposit/formation/rock unit.

The City has established the thresholds as shown below in Table 4.6-1 for identifying whether project grading would result in significant impacts according to sensitivity rating.

TABLE 4.6-1
PALEONTOLOGICAL GRADING THRESHOLDS

Sensitivity Rating	Excavation Volume and Depth Thresholds
High	>1000 cubic yards and >10 feet deep
Moderate	>2000 cubic yards and >10 feet deep
Low-Zero	Mitigation not required

4.6.3 Issue 1: High Resource Potential

Would the project require over 1,000 cubic yards of excavation in a high resource potential geologic deposit/formation/rock unit?

4.6.3.1 Impacts

The project site contains geologic formations considered to be of high (Mission Valley Formation, Stadium Conglomerate, and Pomerado Conglomerate) sensitivity for fossils. Therefore, grading or excavation within areas underlain by Mission Valley Formation, Stadium Conglomerate, and Pomerado Conglomerate could cause physical destruction of fossil remains. Based on the City's thresholds, a significant impact would occur if grading exceeds 1,000 cubic yards and is 10 or more feet deep in the Mission Valley Formation, Stadium Conglomerate, and Pomerado Conglomerate. As approximately 661,000 cubic yards of cut would be required, there is a potential for significant impacts to paleontological resources to occur.

4.6.3.2 Significance of Impacts

Implementation of the project has the potential to result in significant impacts to paleontological resources due to grading within formations to the extent listed in Table 4.6-1. Impacts would be significant.

4.6.3.3 Mitigation, Monitoring, and Reporting

PALEO-1:

I. Prior to Permit Issuance

A. Entitlements Plan Check

1. Prior to issuance of any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits or a Notice to Proceed for Subdivisions, but prior to the first preconstruction meeting, whichever is applicable, the ADD Environmental designee shall verify that the requirements for Paleontological Monitoring have been noted on the appropriate construction documents.

B. Letters of Qualification have been submitted to ADD

1. The applicant shall submit a letter of verification to MMC identifying the PI for the project and the names of all persons involved in the paleontological monitoring program, as defined in the City Paleontology Guidelines.

2. MMC will provide a letter to the applicant confirming the qualifications of the PI and all persons involved in the paleontological monitoring of the project.

3. Prior to the start of work, the applicant shall obtain approval from MMC for any personnel changes associated with the monitoring program.

II. Prior to Start of Construction

A. Verification of Records Search

1. The PI shall provide verification to MMC that a site specific records search has been completed. Verification includes, but is not limited to a copy of a confirmation letter from San Diego Natural History Museum, other institution or, if the search was in-house, a letter of verification from the PI stating that the search was completed.

2. The letter shall introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities.

B. PI Shall Attend Precon Meetings

1. Prior to beginning any work that requires monitoring; the Applicant shall arrange a Precon Meeting that shall include the PI, CM and/or Grading Contractor, RE, BI, if appropriate, and MMC. The qualified paleontologist shall attend any grading/excavation related Precon Meetings to make comments and/or

suggestions concerning the Paleontological Monitoring program with the Construction Manager and/or Grading Contractor.

a. If the PI is unable to attend the Precon Meeting, the Applicant shall schedule a focused Precon Meeting with MMC, the PI, RE, CM or BI, if appropriate, prior to the start of any work that requires monitoring.

2. Identify Areas to be Monitored

Prior to the start of any work that requires monitoring, the PI shall submit a Paleontological Monitoring Exhibit (PME) based on the appropriate construction documents (reduced to 11x17) to MMC identifying the areas to be monitored including the delineation of grading/excavation limits. The PME shall be based on the results of a site specific records search as well as information regarding existing known soil conditions (native or formation).

3. When Monitoring Will Occur

a. Prior to the start of any work, the PI shall also submit a construction schedule to MMC through the RE indicating when and where monitoring will occur.

b. The PI may submit a detailed letter to MMC prior to the start of work or during construction requesting a modification to the monitoring program. This request shall be based on relevant information such as review of final construction documents which indicate conditions such as depth of excavation and/or site graded to bedrock, presence or absence of fossil resources, etc., which may reduce or increase the potential for resources to be present.

III. During Construction

A. Monitor Shall be Present During Grading/Excavation/Trenching

1. The monitor shall be present full-time during grading/excavation/trenching activities as identified on the PME that could result in impacts to formations with high and moderate resource sensitivity. **The Construction Manager is responsible for notifying the RE, PI, and MMC of changes to any construction activities such as in the case of a potential safety concern within the area being monitored. In certain circumstances OSHA safety requirements may necessitate modification of the PME.**

2. The PI may submit a detailed letter to MMC during construction requesting a modification to the monitoring program when a field condition such as trenching activities that do not encounter formational soils as previously assumed, and/or

when unique/unusual fossils are encountered, which may reduce or increase the potential for resources to be present.

3. The monitor shall document field activity via the CSVR. The CSVR's shall be faxed by the CM to the RE the first day of monitoring, the last day of monitoring, monthly (**Notification of Monitoring Completion)**, and in the case of ANY discoveries. The RE shall forward copies to MMC.

B. Discovery Notification Process

1. In the event of a discovery, the Paleontological Monitor shall direct the contractor to temporarily divert trenching activities in the area of discovery and immediately notify the RE or BI, as appropriate.

2. The Monitor shall immediately notify the PI (unless Monitor is the PI) of the discovery.

3. The PI shall immediately notify MMC by phone of the discovery, and shall also submit written documentation to MMC within 24 hours by fax or email with photos of the resource in context, if possible.

C. Determination of Significance

1. The PI shall evaluate the significance of the resource.

a. The PI shall immediately notify MMC by phone to discuss significance determination and shall also submit a letter to MMC indicating whether additional mitigation is required. The determination of significance for fossil discoveries shall be at the discretion of the PI.

b. If the resource is significant, the PI shall submit a Paleontological Recovery Program (PRP) and obtain written approval from MMC. Impacts to significant resources must be mitigated before ground disturbing activities in the area of discovery will be allowed to resume.

c. If resource is not significant (e.g., small pieces of broken common shell fragments or other scattered common fossils) the PI shall notify the RE, or BI as appropriate, that a non-significant discovery has been made. The Paleontologist shall continue to monitor the area without notification to MMC unless a significant resource is encountered.

d. The PI shall submit a letter to MMC indicating that fossil resources will be collected, curated, and documented in the Final Monitoring Report. The letter shall also indicate that no further work is required.

IV. Night and/or Weekend Work

A. If night and/or weekend work is included in the contract

1. When night and/or weekend work is included in the contract package, the extent and timing shall be presented and discussed at the precon meeting.

2. The following procedures shall be followed.

a. No Discoveries

In the event that no discoveries were encountered during night and/or weekend work, The PI shall record the information on the CSVR and submit to MMC via fax by 8 A.M. on the next business day.

b. Discoveries

All discoveries shall be processed and documented using the existing procedures detailed in Sections III - During Construction.

c. Potentially Significant Discoveries

If the PI determines that a potentially significant discovery has been made, the procedures detailed under Section III - During Construction shall be followed.

d. The PI shall immediately contact MMC, or by 8 A.M. on the next business day to report and discuss the findings as indicated in Section III-B, unless other specific arrangements have been made.

B. If night work becomes necessary during the course of construction

1. The Construction Manager shall notify the RE, or BI, as appropriate, a minimum of 24 hours before the work is to begin.

2. The RE, or BI, as appropriate, shall notify MMC immediately.

C. All other procedures described above shall apply, as appropriate.

V. Post Construction

A. Preparation and Submittal of Draft Monitoring Report

1. The PI shall submit two copies of the Draft Monitoring Report (even if negative), prepared in accordance with the Paleontological Guidelines which describes the results, analysis, and conclusions of all phases of the Paleontological Monitoring

Program (with appropriate graphics) to MMC for review and approval within 90 days following the completion of monitoring,

a. For significant paleontological resources encountered during monitoring, the Paleontological Recovery Program shall be included in the Draft Monitoring Report.

b. Recording Sites with the San Diego Natural History Museum

The PI shall be responsible for recording (on the appropriate forms) any significant or potentially significant fossil resources encountered during the Paleontological Monitoring Program in accordance with the City's Paleontological Guidelines, and submittal of such forms to the San Diego Natural History Museum with the Final Monitoring Report.

2. MMC shall return the Draft Monitoring Report to the PI for revision or, for preparation of the Final Report.

3. The PI shall submit revised Draft Monitoring Report to MMC for approval.

4. MMC shall provide written verification to the PI of the approved report.

5. MMC shall notify the RE or BI, as appropriate, of receipt of all Draft Monitoring Report submittals and approvals.

B. Handling of Fossil Remains

1. The PI shall be responsible for ensuring that all fossil remains collected are cleaned and catalogued.

2. The PI shall be responsible for ensuring that all fossil remains are analyzed to identify function and chronology as they relate to the geologic history of the area; that faunal material is identified as to species; and that specialty studies are completed, as appropriate

C. Curation of fossil remains: Deed of Gift and Acceptance Verification

1. The PI shall be responsible for ensuring that all fossil remains associated with the monitoring for this project are permanently curated with an appropriate institution.

2. The PI shall include the Acceptance Verification from the curation institution in the Final Monitoring Report submitted to the RE or BI and MMC.

D. Final Monitoring Report(s)

1. The PI shall submit two copies of the Final Monitoring Report to MMC (even if negative), within 90 days after notification from MMC that the draft report has been approved.

2. The RE shall, in no case, issue the Notice of Completion until receiving a copy of the approved Final Monitoring Report from MMC which includes the Acceptance Verification from the curation institution.

4.6.3.4 Significance of Impacts After Mitigation

Implementation of the mitigation measure outlined above would reduce impacts to a level that is less than significant because it would provide for the recovery of fossil material that otherwise could be lost during grading.

4.6.4 Issue 2: Moderate Resource Potential

Would the project require over 2,000 cubic yards of excavation in a moderate resource potential geologic deposit/formation/rock unit?

4.6.4.1 Impacts

Since there are no identified moderate resource potential geologic deposits, formations, or rock units on-site, impacts would be less that significant.

4.6.4.2 Significance of Impacts

There are no identified moderate resource potential geologic deposits, formations, or rock units. Impacts would be less than significant.

4.6.4.3 Mitigation, Monitoring, and Reporting

Impacts would be less than significant. No mitigation is required.

4.7 Visual Quality/Neighborhood Character/Landform Alteration

This section addresses the visual aspects of the project and compatibility in terms of neighborhood character with existing and planned land uses.

4.7.1 Existing Conditions

4.7.1.1 Existing Visual Landscape

a. Landform

The project site is located in an area of hills and drainages on the south side of Carroll Canyon. Land in the area is generally characterized by slopes in excess of 13 percent, found primarily in Carroll Canyon and subsidiary canyons, and/or eucalyptus trees. The project site is bounded on the south by MCAS Miramar, on the southwest by Alliant International University, on the northwest by residential uses, on the north by Pomerado Road and residential uses, and on the east by the Chabad Center. A portion of the project site currently contains a baseball field, and the remainder is undeveloped.

The SMRCP defines five different neighborhood planning areas. The project site is located in the SMRCP Area D. This area comprises approximately 800 acres in the southeast portion of the planning area. Land in this area is generally characterized by slopes with eucalyptus trees primarily in Carroll Canyon and subsidiary canyons. Preservation of mature eucalyptus trees is the primary design consideration in this area.

A large ridge runs diagonally across the center of the property from the southeast to northwest. A drainage originally ran from the southeast corner of the property diagonally across the property and emptied into Carroll Canyon. Elevation on the property ranges from approximately 550 to 760 feet above mean sea level. The southern end of the property consists of the north-facing slopes of an off-site westerly trending ridge, and is cut by two drainages. Cobbles are eroding out of the slopes of the large ridge and are scattered over the slopes and ridge top.

Currently, the vegetation on the project property consists predominately of eucalyptus and disturbed southern mixed chaparral. The disturbed southern mixed chaparral occurs on the central ridge. On the north-facing slope it forms an understory to the scattered eucalyptus, and becomes denser towards the top and on the south-facing slope of the ridge. There is a patch of disturbed coastal sage scrub in the floodplain. The floodplain has a large grove of eucalyptus, and there is a second eucalyptus grove on the north-facing slope at the south end of the property. Eucalyptus trees are scattered across the rest of the property, denser at the base of the large central ridge and thinning as elevation increases.

Figures 4.7-1a and 4.7-1b show photographs of the project site from Pomerado Road. Figure 4.7-1c shows the project site looking west at the cut and filled canyon. Figure 4.7-1d shows views of the density of the eucalyptus grove in the Carroll Canyon floodplain. See Figure 2-3 for an aerial photograph of the project site.

b. Neighborhood Character

The SMRCP area is characterized primarily by single-family residential uses and open space. Commercial and industrial/storage land uses are located at the western portion of the area adjacent to I-15. Several multi-family developments are also located in the western portion of the area.

4.7.1.2 Views

The project site is visible from Pomerado Road and adjacent properties including Alliant International University, the Chabad Center, and residential uses to the north and northwest.

The SMRCP identifies three public vantage points in the community: public viewpoints overlooking Miramar Reservoir, Pomerado Road overlooking Carroll Canyon, and SDG&E Easement (SMRCP Area E) views towards open space. The vantage point relevant to the project is Pomerado Road overlooking Carroll Canyon. This vantage point can be seen in Figures 4.7-1a and 4.7-1b.

4.7.1.3 Applicable Polices and Regulations

The following goal is identified in the SMRCP: “Preserve and enhance the valued natural resources of the Scripps Miramar Ranch community: hills, trees, water resources, Miramar Reservoir, Carroll Canyon and subsidiary canyons; maximize public benefit through public ownership and/or access, both visual and physical, to these resources.” Lots on the perimeter of Miramar Reservoir and Carroll Canyon should respect “special treatment” criteria for landscaping, grading, and architecture which will minimize the visual impact of development on the adjoining scenic areas. The Design Element of the SMRCP sets forth the criteria for development adjacent to the Miramar Reservoir and Carroll Canyon.

Several existing polices and development regulations within the General Plan and SMRCP provide pertinent visual quality and neighborhood character guidance for development in the SMRCP area.

Image Source: Google Street View

FIGURE 4.7-1a
Photograph of Project Site from Pomerado Road

RECON

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Image Source: Google Street View

FIGURE 4.7-1b
Photograph of Project Site from Pomerado Road

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FIGURE 4.7-1c
Photograph of Project Site Looking West at the Cut and Filled Canyon

RECON

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FIGURE 4.7-1d
Views of Density of Eucalyptus Grove in Carroll Canyon Floodplain

RECON

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a. General Plan

In its Urban Design Element, the General Plan includes goals and policies that emphasize the integration of compatible land uses, the creation of transit-focused, walkable villages, the provision of high-quality public spaces and civic architecture, as well as the enhancement of the visual quality of all types of development. The introduction to the Urban Design Element states that

> . . . as the availability of vacant land becomes more limited, designing infill development and redevelopment that builds upon our existing communities becomes increasingly important. A compact, efficient, and environmentally sensitive pattern of development becomes increasingly important as the City continues to grow.

The Urban Design Element policies relevant to the design of the project are included below.

Natural Features

UD-A.1. Preserve and protect natural landforms and features.

a. Protect the integrity of community plan designated open spaces.

b. Continue to implement the MSCP to conserve San Diego's natural environment and create a linked open space system. Preserve and enhance remaining naturally occurring features such as wetlands, riparian zones, canyons, and ridge lines.

Open Space Linkages

UD-A.2. Use open space and landscape to define and link communities.

a. Link villages, public attractions, canyons, open space, and other destinations together by connecting them with trail systems, bikeways, landscaped boulevards, street trees, formalized parks, and/or natural open space, as appropriate.

b. Preserve and encourage preservation of physical connectivity and access to open space.

Development Adjacent to Natural Features and Park Lands

UD-A.3. Design development adjacent to natural features in a sensitive manner to highlight and complement the natural environment in areas designated for development.

a. Integrate development on hillside parcels with the natural environment to preserve and enhance views, and protect areas of unique topography.

b. Minimize grading to maintain the natural topography, while contouring any landform alterations to blend into the natural terrain.

f. Provide increased setbacks from canyon rims or open space areas to ensure that the visibility of new development is minimized.

g. Screen development adjacent to natural features as appropriate so that development does not appear visually intrusive, or interfere with the experience within the open space system. The provision of enhanced landscaping adjacent to natural features could be used to soften the appearance of or buffer development from the natural features.

i. Ensure that the visibility of new development from natural features and open space areas is minimized to preserve the landforms and ridgelines that provide a natural backdrop to the open space systems. For example, development should not be visible from canyon trails at the point the trail is located nearest to proposed development. Lines-of-sight from trails or the open space system could be used to determine compliance with this policy.

j. Design and site buildings to permit visual and physical access to the natural features from the public right-of-way.

k. Encourage location of entrances and windows in development adjacent to open space to overlook the natural features.

l. Protect views from public roadways and parklands to natural canyons, resource areas, and scenic vistas.

Architecture

UD-A.5. Design buildings that contribute to a positive neighborhood character and relate to neighborhood and community context.

a. Relate architecture to San Diego's unique climate and topography.

b. Encourage designs that are sensitive to the scale, form, rhythm, proportions, and materials proximate to commercial areas and residential neighborhoods that have a well-established, distinctive character.

c. Provide architectural features that establish and define a building’s appeal and enhance the neighborhood character.

d. Encourage the use of materials and finishes that reinforce a sense of quality and permanence.

f. Design building wall planes to have shadow relief, where pop-outs, offsetting planes, overhangs, and recessed doorways are used to provide visual interest at the pedestrian level.

g. Design rear elevations of buildings to be as well-detailed and visually interesting as the front elevation if they will be visible from a public right-of-way or accessible public place or street.

j. Provide convenient, safe, well-marked, and attractive pedestrian connections from the public street to building entrances.

UD-A.6. Create street frontages with architectural and landscape interest to provide visual appeal to the streetscape and enhance the pedestrian experience.

c. Ensure that building entries are prominent, visible, and well-located.

d. Maintain existing setback patterns, except where community plans call for a change to the existing pattern.

e. Minimize the visual impact of garages, parking, and parking portals to the pedestrian and street façades.

Landscape

UD-A.8. Landscape materials and design should enhance structures, create and define public and private spaces, and provide shade, aesthetic appeal, and environmental benefits.

a. Maximize the planting of new trees, street trees, and other plants for their shading, air quality, and livability benefits.

b. Encourage water conservation through the use of drought tolerant landscape and gray water irrigation system.

c. Use landscape, especially revegetation, to support storm water management goals and BMPs for filtration, percolation, and erosion control.

d. Use landscape to provide unique identities within neighborhoods and villages.

g. Unify communities by using street trees to link residential areas.

h. Provide “shade over pavement” in concrete areas, especially parking areas (vehicular use areas).

k. Consider landscaped areas as useable and functional amenities for people activities.

m. Utilize “transitional landscaping” (landscape adjacent to natural features) to soften the visual appearance of a development and provide a natural buffer between the development and open space areas.

Surface Parking

UD-A.12. Reduce the amount and visual impact of surface parking lots.

i. Use trees, shade structures, and other landscape to provide shade, and screening and filtering of storm water runoff, in parking lots, including roof-level parking areas.

Lighting

UD-A.13. Provide lighting from a variety of sources at appropriate intensities and qualities for safety.

a. Provide pedestrian-scaled lighting for pedestrian circulation and visibility.

b. Use effective lighting for vehicular traffic while not overwhelming the quality of pedestrian lighting.

c. Use lighting to convey a sense of safety while minimizing glare and contrast.

d. Use vandal-resistant light fixtures that complement the neighborhood and character.

e. Focus lighting to eliminate spill-over so that lighting is directed, and only the intended use is illuminated.

UD-A.16. Minimize the visual and functional impact of utility systems and equipment on streets, sidewalks, and the public realm.

a. Convert overhead utility wires and poles, and associated overhead structures for supplying electric, communication, community antenna television, or similar service to underground.

Safety and Security

UD-A.17. Incorporate Crime Prevention Through Environmental Design measures, as necessary, to reduce incidences of fear and crime, and design safer environments.

Residential Design

UD-B.1. Recognize that the quality of a neighborhood is linked to the overall quality of the built environment. Projects should not be viewed singularly, but viewed as part of the larger neighborhood or community plan area in which they are located for design continuity and compatibility.

a. Integrate new construction with the existing fabric and scale of development in surrounding neighborhoods. Taller or denser development is not necessarily inconsistent with older, lower-density neighborhoods, but must be designed with sensitivity to existing development. For example, new development should not cast shadows or create wind tunnels that will

significantly impact existing development, and should not restrict vehicular or pedestrian movements from existing development.

b. Design new construction to respect the pedestrian orientation of neighborhoods.

c. Provide innovative designs for a variety of housing types to meet the needs of the population.

b. Scripps Miramar Ranch Community Plan

The SMRCP includes objectives and proposals to ensure quality site design that are largely consistent with the 2008 General Plan Urban Design Element.

Open Space

The City's open space network is formed by parks, canyons, river valleys, habitats, beaches, and oceans. Carroll Canyon is identified as open space in the SMRCP. The Parks, Recreation, and Open Space Element of the SMRCP provides objectives in order to provide a well-balanced and aesthetically pleasing system of open space and recreational facilities and opportunities. The Design Element of the SMRCP contains the following proposals:

1. Types of Open Space

d. Carroll Canyon

Disturbance of this important natural open space area should be limited to the absolute minimum required for public welfare and access. While an allowance for improvement of Pomerado Road is anticipated, design and these improvements should result in a "scenic roadway." Bridges rather than fills should be used for road crossings in the canyon bottom. Easements for equestrian trails should go along the canyon bottom. Passive recreation areas, such as the proposed Resource-Based Park, may be located here, but even these uses should respect the presence of rare and/or endangered plant species. The proposed Olympic golf course at the United States International University should be allowed.

e. Planned Residential Developments

These private open space areas shall be treated in accordance with Section 101.0900 of the City Code. Preference should be given to the preservation and planting of eucalyptus trees, of which about 30 varieties are known to grow in San Diego County. Design of open space in Planned Residential Developments should consider the adjoining open spaces and neighborhood themes, and should attempt to enhance these characteristics wherever possible.

2. Access and Utility

Pedestrian access paths should be stressed within open spaces. At least 25 percent of required open space should have a slope of no more than 30 percent, except for Planned Residential Development areas, which shall meet City ordinance requirements. The following general relationships should be observed in the design of open spaces:

- A minimum of 25 percent of future development areas should be left as open space. This open space should occur in such a way as to become a scenic backdrop from public viewpoints and streets. Open space should continue across streets and ridges to provide vista points and access to residents.

- Design of open space should maximize public access and provide a network for pedestrian travel throughout the community.

- Open space should be interspersed throughout the development to maximize its impact on residents and to help define individual neighborhoods.

- The use of clustered housing interrelated with open space is encouraged to avoid unneeded streets on steep hillsides and protect hillside topography, stands of trees, and high-interest plant species.

- Dedicated open space should be incorporated wherever possible into the designated open space system.

- Where preservation of hillsides and trees complicate the normal open space standards, those standards may be met by creating easements over private lots to allow for equivalent uses of open space.

Landform and Grading

The general criteria which apply to the design of landform and grading and are applicable to the project are as follows:

- Development should relate to existing topographic and landscape features. The hill-valley relationship should be maintained and not obliterated. While hilltops and valleys may be graded to permit human settlement, the sense of distinctive landform should remain.

- House foundations, driveways, patios, and other similar structures that occur on steep hillsides should minimize the covered surface and should support or be compatible with natural drainage.

- Buildings should not be located in areas subject to flooding.

- Access for public viewpoints should be provided along hillside crests.
- Cut and fill slopes should emphasize the natural form of hillsides.
- All artificial slopes over 30 feet in height should be sculptured to create rounded, variable slopes. Such slopes must be based on sound engineering investigations and recommendations. Landscaping materials on slopes should be deep-rooted species. Construction control should pay attention to soils compaction and avoid an over-concentration of rocks and cobbles in the outer area of fills.

Architectural Form and Character

Relative to the proposed development, the SMRCP includes the following proposals:

1. Site Relationships

- Each building should relate in terms of mass and bulk to its neighbor, but should not be identical.
- Stereotyped, repetitive patterns should be avoided.
- Any large-scale buildings should be set back from the brow of the hillside. These should be of the highest quality design. Where buildings of different mass and scale occur near one another, it is recommended that varying setbacks and buffers be provided in order to protect the smaller scale buildings.
- Masses of one structure should relate in a sympathetic manner to all neighboring structures. Architectural forms and treatments that are strongly identified as being the same when repeated should be avoided.

2. Building Materials and Colors

- Wall materials and colors should be compatible within the same building as well as to neighboring buildings.
- The following materials are encouraged for building exteriors: natural materials with earth-tone colors; woods with transparent stains or heavy body stains; rough sawn or resawn woods finishes or painted smooth wood; and roof materials of wood shingles or tiles.

3. Building Elevations

- The way light strikes a building has a great deal to do with how it is perceived. Shadow areas give buildings depth and substance. The visual effect of light and shadow on buildings is perhaps the most valuable design tool available to the housing designer.

- Every building should have shadow relief. Popouts, overhangs, and recesses may be used to produce effective shadow interest areas. Larger buildings require more shadow relief than do smaller buildings. Large, unbroken expanses of wall should usually be avoided.

4.7.2 Significance Determination Thresholds

Based on the City's 2011 Significance Determination Thresholds, a project would have a significant impact on visual quality and neighborhood character if the project would:

1. Result in a substantial obstruction of any vista or scenic view from a public viewing area as identified in the community plan;

2. Result in a negative aesthetic site or project;

3. Result in bulk, scale, materials, or style which would be incompatible with surrounding development;

4. Cause a substantial alteration to the existing or planned character of the area;

5. Result in a substantial change in the existing landform.

4.7.3 Issue 1: Public Views

Would the project result in a substantial obstruction of any vista or scenic view from a public viewing area as identified in the community plan?

4.7.3.1 Impacts

The City's 2011 Significance Determination Thresholds provide an expansion of the above public views significance thresholds to more accurately evaluate significance potential. Accordingly, a significant impact to public views could result if a project would block public views from designated open space areas, public roads, or parks, or to significant visual landmarks or scenic vistas, and one or more of the following conditions apply:

a. the project would substantially block a view through a designated public view corridor as shown in an adopted community plan, the General Plan, or the Local Coastal Program;

b. the project would cause a substantial view blockage from a public viewing area of a public resource (such as the ocean) that is considered significant by the applicable community plan;

c. the project exceeds the allowed height or bulk regulations, and this excess results in a substantial view blockage from a public viewing area; and

d. the project would have a cumulative effect by opening up a new area for development which would ultimately cause extensive view blockage.

a. Public View Corridor Blockage

As described previously, the SMRCP identifies the public vantage point relevant to the project, as Pomerado Road overlooks Carroll Canyon. The project would be visible from Pomerado Road and adjacent properties, including Alliant International University, the Chabad Center, and residential uses to the north and northwest. Views from private property are not considered by CEQA or protected by the City.

The grading footprint would be set back approximately 390 feet south of the Pomerado Road public right-of-way, and the closest building would be set back over 650 feet south of the Pomerado Road public right-of-way. Since the project would be set back about 390 feet south of Pomerado Road and Carroll Canyon, views of Carroll Canyon from Pomerado Road would still be visible, and the project would not block this view. Figure 4.7-2 shows perspectives of the project site from Pomerado Road (see Perspectives 1, 2, and 3). As shown, the project would not block the view of Carroll Canyon from public vantage points along Pomerado Road. These perspectives are discussed further under Section 4.7.4, Issue 2: Aesthetics, below.

b. View Blockage of Public Resources

Carroll Canyon and the eucalyptus woodland in Carroll Canyon are public resources. As discussed above, because the project would not intervene between Pomerado Road (public viewing area) and Carroll Canyon (public resource), it would not block views of Carroll Canyon from Pomerado Road. As shown in Figure 4.7-2, the project would not block the view of Carroll Canyon from public vantage points along Pomerado Road.

c. Height and Bulk Regulations

As discussed in Section 3.0, several of the proposed buildings would exceed the maximum structure height of 35 feet in the RS-1-8 zone. Figure 4.7-3 shows the rooftop plan and heights. As shown here and in the visual simulations in Figure 4.7-2, the height of the proposed buildings would not result in a substantial view blockage from Pomerado Road.

d. New Area for Development

The project site is bounded by Alliant International University and residential development to the west, Chabad Center and residential development to the east, Pomerado Road and residential development to the north, and MCAS Miramar to the south. Similar to the adjacent development to the east and west, the project's development would be set back from Pomerado Road and upslope from Carroll Canyon, thus preserving the Carroll Canyon open space. As such, the project would not open up the Carroll Canyon corridor for new development that would ultimately cause extensive view blockage.

In summary, while the project would alter views of the site from Pomerado Road (see Figure 4.7-2), the project would not block any public view corridors or result in a blockage of a public resource from a public viewing area. Thus, impacts would be less than significant.

4.7.3.2 Significance of Impacts

The project would not result in a substantial obstruction of any vista or scenic view from a public viewing area as identified in the SMRCP. Impacts, therefore, would be less than significant.

4.7.3.3 Mitigation, Monitoring, and Reporting

Impacts would be less than significant. No mitigation is required.

4.7.4 Issue 2: Aesthetics

Would the project result in a negative aesthetic site or project?

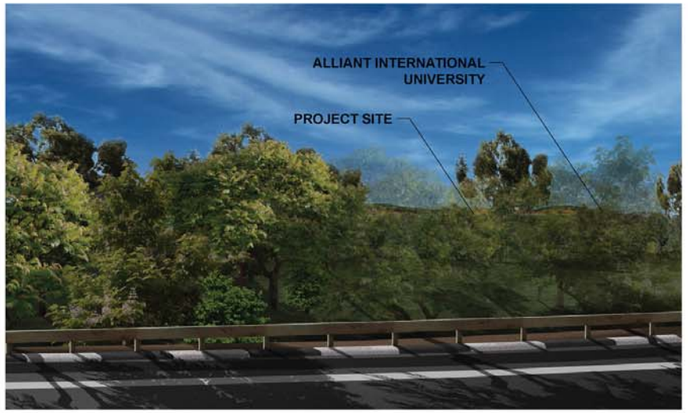
4.7.4.1 Impacts

In order to demonstrate the change in the aesthetic character and describe the visibility of the project from surrounding areas, a visual analysis was prepared using site photographs and computer-generated three-dimensional project modeling. The view point locations and visual simulations are shown in Figure 4.7-2.

Visual Simulation 1 shows a view from Pomerado Road just west of Chabad Center Driveway looking south at the project site. Visual Simulation 2 shows a view from Pomerado Road approximately 500 feet west of Visual Simulation 1 looking south at the project site. Visual Simulation 3 shows a view from Pomerado Road from the northwest project boundary looking southeast at the project site. Visual Simulation 4 shows a view from Chabad Center Driveway.

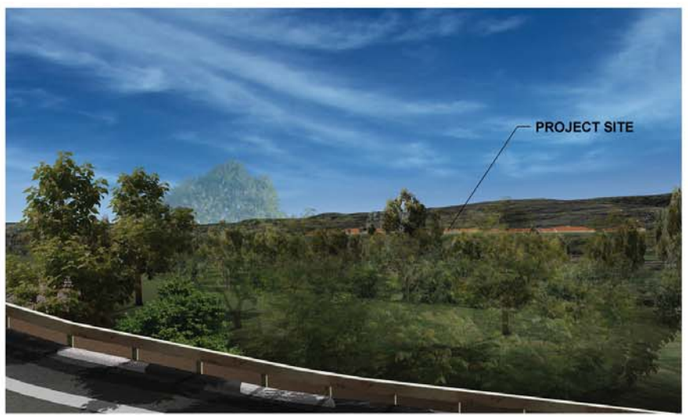
As evidenced by the visual simulations, the project would result in minor alterations to the existing visual characteristics associated with the site from vantage points on Pomerado Road. The proposed grading footprint would be set back approximately 390 feet south of Pomerado Road and buildings would be set back by over 650 feet south of Pomerado Road, thereby preserving the existing vegetation and landform of Carroll Canyon and the open space located between Pomerado Road and the proposed buildings. Rooftops of the proposed buildings would be visible at a distance from Pomerado Road. Due to the topography and intervening vegetation, the project would not be highly visible from Pomerado Road or other public locations.

Map Source: Latitude 33



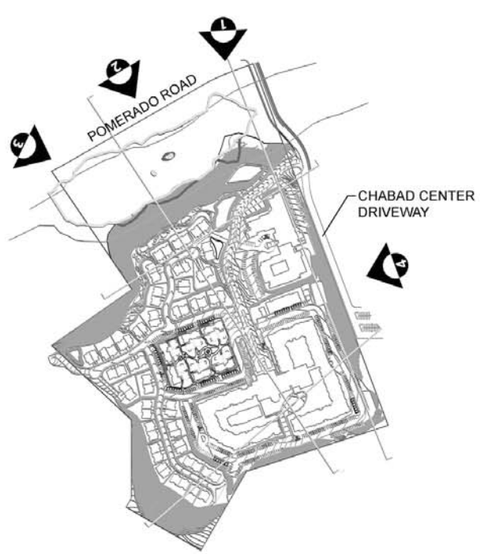
PERSPECTIVE 1 | POMERADO ROAD

PERSPECTIVE 2 | POMERADO ROAD



PERSPECTIVE 3 | POMERADO ROAD

PERSPECTIVE 4 | CHABAD CENTER DRIVEWAY



KEY MAP

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FIGURE 4.7-2
Visual Simulations of the Project

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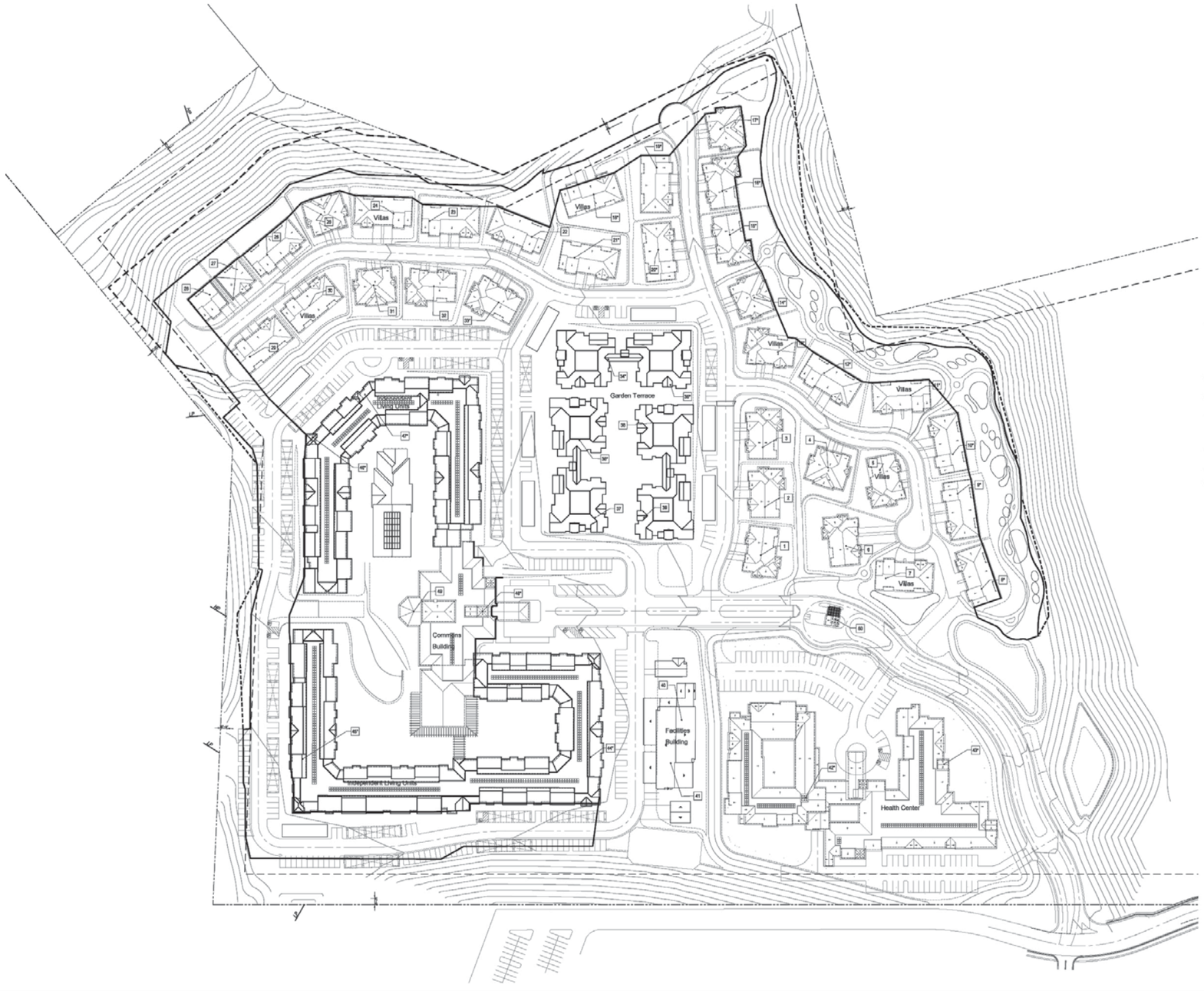
Map Source: KTU+A



		ROOF TOP	PROPOSED GRADE	EXISTING GRADE	ABOVE FINISH GRADE	ABOVE LOWEST GRADE
VILLAS	1	± 675.2'	654.2'	± 670'	± 21'	± 5.2'
	2	± 673.5'	652.5'	± 660'	± 21'	± 13.5'
	3	± 671.9'	650.9'	± 650'	± 21'	± 21.9'
	4	± 669.6'	646.6'	± 645'	± 23'	± 24.6'
	5	± 665.2'	644.2'	± 630' [1]	± 21'	± 35.2'
	6	± 664.2'	643.2'	± 645'	± 21'	± 19.2'
	7	± 663.2'	642.2'	± 635'	± 21'	± 28.2'
	8	± 663.2'	642.2'	± 615' [1]	± 21'	± 48.2'
	9	± 664.3'	643.3'	± 615' [1]	± 21'	± 49.3'
	10	± 666.5'	645.5'	± 610' [1]	± 21'	± 56.5'
	11	± 666.8'	645.8'	± 620' [1]	± 21'	± 46.8'
	12	± 668.5'	647.5'	± 630' [1]	± 21'	± 38.5'
	13	± 670.1'	649.1'	± 630' [1]	± 21'	± 40.1'
	14	± 671.1'	648.1'	± 620' [1]	± 23'	± 51.1'
	15	± 667.9'	646.9'	± 625' [1]	± 21'	± 42.9'
	16	± 667.1'	646.1'	± 625' [1]	± 21'	± 42.1'
	17	± 667.8'	644.8'	± 625' [1]	± 23'	± 42.8'
	18	± 671.3'	650.3'	± 625' [1]	± 21'	± 46.3'
	19	± 667.4'	646.4'	± 625' [1]	± 21'	± 42.4'
	20	± 668.2'	647.2'	± 625' [1]	± 21'	± 43.2'
	21	± 673.3'	652.3'	± 625' [1]	± 21'	± 48.3'
	22	± 678.2'	657.2'	± 655'	± 21'	± 23.2'
	23	± 680.7'	659.7'	± 675'	± 21'	± 5.7'
	24	± 684.3'	663.3'	± 700'	± 21'	- 15.7'
	25	± 687.5'	664.5'	± 710'	± 23'	- 22.5'
	26	± 687.2'	666.2'	± 705'	± 21'	- 17.8'
	27	± 688.3'	667.3'	± 700'	± 21'	- 11.7'
	28	± 689.2'	668.2'	± 680'	± 21'	± 9.2'
	29	± 689.1'	668.1'	± 680'	± 21'	± 9.1'
	30	± 689'	668'	± 690'	± 21'	- 1'
	31	± 669.1'	646.1'	± 680'	± 23'	- 10.9'
	32	± 681.6'	660.6'	± 660'	± 21'	± 21.6'
	33	± 677.6'	656.6'	± 625' [1]	± 21'	± 52.6'
GT	34	± 686.7'	654.7'	± 625' [1]	± 32'	± 61.7'
	35	± 686.7'	654.7'	± 625' [1]	± 32'	± 61.7'
	36	± 686.7'	654.7'	± 630' [1]	± 32'	± 56.7'
	37	± 684.7'	654.7'	± 680'	± 30'	± 4.7'
	38	± 686.7'	654.7'	± 670'	± 32'	± 16.7'
	39	± 684.7'	654.7'	± 680'	± 30'	± 4.7'
FC	40	± 679.3'	657.3'	± 695'	± 22'	- 15.7'
HC	41	± 690.3'	657.3'	± 700'	± 33'	- 9.7'
	42	± 681.7'	644.7'	± 670'	± 37'	± 11.7'
	43	± 669.7'	644.7'	± 630' [1]	± 25'	± 39.7'
ILU	44	± 701'	661'	± 670'	± 40'	± 31'
	45	± 701'	661'	± 640' [1]	± 40'	± 61'
	46	± 701'	651'	± 630' [1]	± 50'	± 71'
	47	± 700'	651'	± 665'	± 49'	± 36'
COM	48	± 685'	663'	± 675'	± 22'	± 10'
GH	49	± 675'	649'	± 660'	± 26'	± 15'
	50	± 666.7'	644.7'	± 655'	± 22'	± 11.7'

[1] Exceeds the maximum height of 35 - feet

V - Villa
GT - Garden Terrace
FC - Facilities
HC - Health Center
ILU - Independent Living Units
COM - Commons Building
GH - Guard House

NOTES

1. Address: 10455 Pomerado Road, San Diego, CA 92131

KEYNOTES

2 Approximate Building Setback

0 Feet 120

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FIGURE 4.7-3
Rooftop Plan and Heights

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Visual Simulation 4 shows a view of the project from Chabad Center Driveway looking west. The project would be visible from this private location; however, it would not result in a negative aesthetic. Landscaping would consist of an old ranch design with stone walls, boulders, and tree groves that would complement the existing character of the project site.

Cross sections of the project site are shown in Figure 4.7-4. As shown, grading would include a 2:1 to 1.5:1 slope that would be visible from Pomerado Road. This slope would be vegetated with a native open space hydroseed mix and would be compatible with the existing mature native vegetation and eucalyptus grove in the preserved open space between the grading limits and Pomerado Road. The overall landscape theme for the project would be an old ranch design with old stone walls, boulders, and tree groves that would blend with the neighborhood character.

The visual simulations and analysis above demonstrate that the project would alter the site's visual appearance and aesthetic character. However, from public vantage points, the grading would blend into the natural topography, the Carroll Canyon open space along Pomerado Road would be preserved, and existing and proposed landscaping would screen buildings from view.

4.7.4.2 Significance of Impacts

The project would result in minor alternations to the existing views from Pomerado Road. However, due to the project design, the setback from Pomerado Road, and the intervening vegetation, the project would not result in a negative aesthetic. Impacts would be less than significant.

4.7.4.3 Mitigation, Monitoring, and Reporting

Impacts would be less than significant. No mitigation is required.

4.7.5 Issue 3: Bulk and Scale

Would the project result in bulk, scale, materials, or style which would be incompatible with surrounding development?

4.7.5.1 Impacts

According to the City's 2011 Significance Determination Thresholds, the project's bulk and scale would be considered significantly incompatible with surrounding development if it:

a. creates a disorganized appearance that substantially conflicts with City codes;

b. conflicts significantly with the height, bulk, or coverage regulations of the zone and does not provide architectural interest;

c. constructs crib, retaining, or noise walls greater than six feet in height and 50 feet in length with only minimal landscape screening where the walls would be visible to the public; or

d. creates an exceedingly monotonous visual environment.

a. Disorganized Appearance

The internal pedestrian system and pedestrian linkages proposed for the project would provide connectivity and continuity, and landscaping would consist of an old ranch design with stone walls, boulders, and tree groves that would complement the existing character of the project site. For these reasons, the project would not create a disorganized appearance.

b. Height, Bulk, and Coverage Regulations

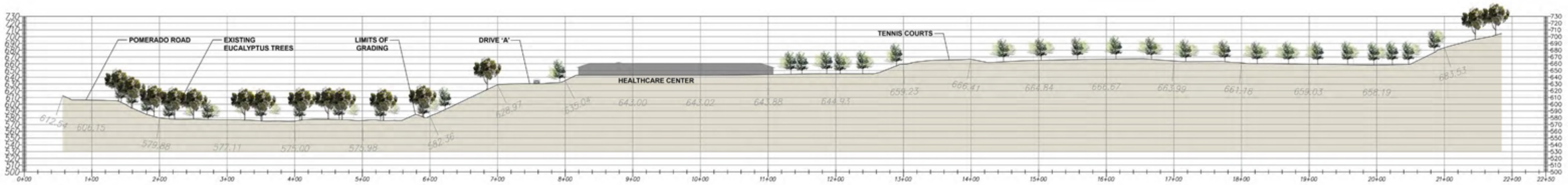
Several of the proposed buildings would exceed the maximum structure height of 35 feet in the RS-1-8 zone. However, as shown, the height of the proposed buildings would not result in a substantial view blockage from Pomerado Road. The proposed buildings would be set back by over 650 feet south of Pomerado Road, preserving the existing vegetation and landform of Carroll Canyon and the open space located between Pomerado Road and the proposed buildings. Due to the topography and intervening vegetation, the buildings would not be highly visible from Pomerado Road or other public locations. As such, the project would not conflict significantly with the height, bulk, and coverage regulations.

c. Retaining Walls

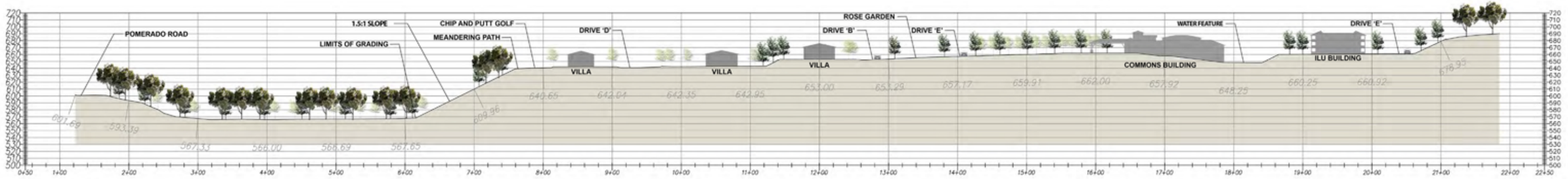
Nine retaining walls over 3 feet tall would be used in areas with steep manufactured slopes. These retaining walls would have a total length of approximately 1,669 feet, and would range in height from 3 to 11 feet. Five retaining walls would exceed 6 feet in height and 50 feet in length. A total of 737 feet in length would exceed 6 feet in height. Landscaping would screen the retaining walls.

As shown in Figure 3-6, these retaining walls would be in locations along the eastern and southern project boundaries. Along these eastern and southern project boundaries, the grade would slope from higher elevations at the project boundaries down to lower elevations within the project boundaries, and the retaining walls would be located at the toe of these slopes (see Figure 3-6). As such, they would not be visible to viewers from the south or the east. They would also not be visible to viewers from the north or west (specifically Pomerado Road) because the line of sight would be obstructed by proposed buildings on-site. Thus, the retaining walls would not be visible from off-site locations.

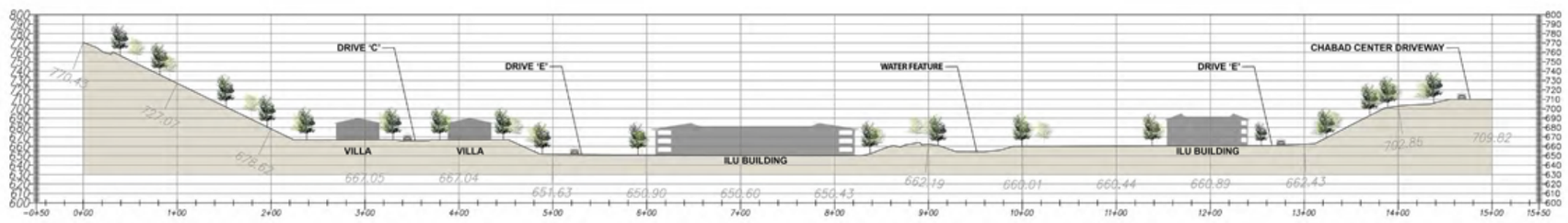
Map Source: Latitude 33



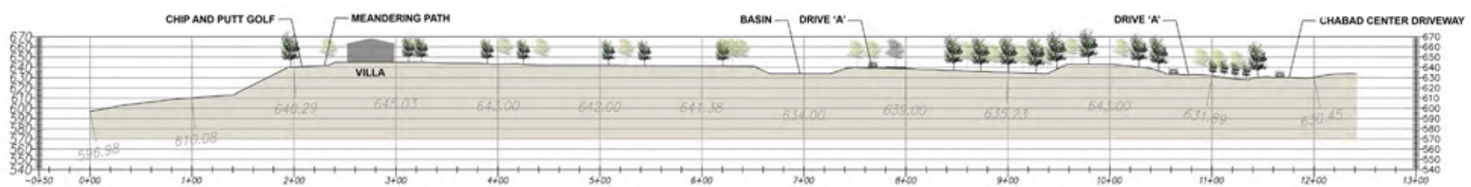
SITE SECTION A - A



SITE SECTION B - B



SITE SECTION C - C



SITE SECTION D - D

KEY MAP

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FIGURE 4.7-4
Project Site Cross Sections

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d. Monotonous Visual Environment

The proposed buildings would provide architectural variation and would be interspersed by landscaping and open space. Because of the architectural variation, the project would not create a monotonous building façade. Carroll Canyon open space would be preserved, and existing and proposed landscaping would screen buildings from view. Thus, the project would not create an exceedingly monotonous visual environment.

4.7.5.2 Significance of Impacts

The project would not create a disorganized appearance or conflict significantly with the height, bulk, and coverage regulations. Retaining walls exceeding six feet in height would not be visible to the public, and the project would not create an exceedingly monotonous visual environment. Impacts would be less than significant.

4.7.5.3 Mitigation, Monitoring, and Reporting

Impacts would be less than significant. No mitigation is required.

4.7.6 Issue 4: Neighborhood Character

Would the project cause a substantial alteration to the existing or planned character of the area?

4.7.6.1 Impacts

In the existing condition, the immediate project area is characterized by single-family homes, Alliant International University, Chabad Center and eucalyptus groves. In terms of bulk, scale, materials, and style, development of the project would be compatible with the adjacent development in the project area. The project would provide architectural variation, and building materials would consist of natural materials with earth-tone colors. The overall landscape theme for the project would be an old ranch design with old stone walls, boulders, and tree groves. The project would preserve 5.49 acres of eucalyptus trees on the project site, and. the Carroll Canyon open space would be preserved as MHPA. Existing and proposed landscaping and topography would screen buildings from view. As such, the project would be compatible with the neighborhood character.

4.7.6.2 Significance of Impacts

The project would be consistent with and contribute to the character of the project area and would preserve eucalyptus woodland within the Carroll Canyon open space. As such, neighborhood character impacts would be less than significant.

4.7.6.3 Mitigation, Monitoring, and Reporting

Impacts would be less than significant. No mitigation is required.

4.7.7 Issue 5: Landform Alteration

Would the project result in a substantial change in the existing landform?

In accordance with the City's Significance Thresholds, a significant impact to natural landform impact would result if implementation of a project would alter more than 2,000 cubic yards of earth per graded acre by either excavation or fill, and one or more of the following conditions apply:

a. Project grading would disturb steep (25 percent gradient or steeper) slopes in excess of the encroachment allowance of the ESL regulations and steep hillside guidelines (LDC, Section 143.0101);

b. The project would create manufactured slopes higher than 10 feet or steeper than 2:1 (50 percent) slope gradient;

c. The project would result in a change in elevation of steep natural slopes from existing grade to proposed grade of more than 5 feet by either excavation or fill, unless the area over which excavation or fill would exceed 5 feet is only at isolated points on the site; or

d. The project design includes mass terracing of natural slopes with cut or fill slopes to construct flat-pad structures.

However, the above conditions may not be considered significant if one or more of the following apply:

a. The grading plans clearly demonstrate, with both spot elevations and contours, that the proposed landforms will very closely imitate the existing on-site landform and/or the undisturbed, pre-existing surrounding neighborhood landforms. This may be achieved through "naturalized" variable slopes.

b. The grading plans clearly demonstrate, with both spot elevations and contours, that the proposed slopes follow the natural existing landform and at no point vary substantially from the natural landform elevations.

c. The proposed excavation or fill is necessary to permit installation of alternative design features such as step-down or detached buildings, non-typical roadway or parking lot designs, and alternative retaining wall designs which reduce the project's overall grading requirements.

4.7.7.1 Impacts

Figure 3-6 shows the proposed grading plan. The project proposes approximately 661,000 cubic yards of cut and 661,000 cubic yards of fill, balanced on-site. This amount of earthwork would exceed the 2,000 cubic yards of earth graded per acre threshold, as the proposed grading would amount to approximately 15,582 cubic yards of earth graded per acre. Because earthwork would exceed the 2,000 cubic yard thresholds, conditions (a) through (d) above were analyzed.

a. Steep Slopes

   Figure 3-7 shows the steep slopes on the project site. The project site contains 3.71 acres of slopes in excess of 25 percent, which is approximately seven percent of the total project site. Project grading would encroach into 3.34 acres of steep slopes (90 percent of the steep slope acreage on-site). The encroachment in slopes greater than 25 percent would result from grading at the southern portion of the project site. An SDP is also required due to the steepness and heights of some of the proposed slopes, as outlined in City Municipal Code §142.0103(b). Supplemental findings per City Municipal Code §126.0504 would be required to support an ESL deviation.

b. Manufactured Slopes

   The project would create 2:1 manufactured slopes in excess of 10 feet around the perimeter of the grading footprint, and 2:1 to 1.5:1 manufactured slope in excess of 10 feet at the northern portion of the grading footprint. These slopes would range from approximately 565 to 650 feet above mean sea level at the north of the development footprint, 640 to 710 feet above mean sea level at the east of the development footprint, 660 to 760 feet above mean sea level at the west of the development footprint, and 650 to 690 feet above mean sea level at the south of the development footprint.

c. Change in Elevation

   The project would also result in a change in elevation of steep natural slopes from existing grade to proposed grade of more than 5 feet within the development footprint.

d. Mass Terracing

   The project design does not include mass terracing of natural slopes with cut or fill slopes to construct flat-pad structures.

As stated in the significance thresholds, the above conditions may not be considered significant if: (1) the proposed landforms would closely imitate the existing on-site landform and/or the undisturbed, pre-existing surrounding neighborhood landforms, (2) the proposed slopes follow the natural existing landform and at no point vary substantially from the natural landform elevations, or (3) the proposed excavation or fill is necessary to permit installation of alternative design features which reduce the project‘s overall grading requirements.

The LDC contains Steep Hillside Guidelines that provide standards and guidelines intended to assist in the interpretation and implementation of the development regulations for steep hillsides contained in Chapter 14, Article 3, Division 1, ESL. The project encroaches into steep hillsides, and is therefore subject to the ESL Regulations and was evaluated for conformance with the Steep Hillside Guidelines. The Steep Hillside Guidelines contain design standards that must be incorporated into the project design, and projects proposing to encroach into steep hillsides shall demonstrate that all design standards have been incorporated and have resulted in the most sensitive design possible. The Steep Hillside Guidelines Section II(D) Commercial, Industrial, and Other Non-Residential Development design standards apply to the project. The following is a discussion of the project's conformance with the Steep Hillside Guidelines design standards.

Standard 1: Development of steep hillsides shall respect existing natural landforms.

This standard may be achieved by incorporating into the development design the following guidelines, as appropriate, for the site and conditions and the proposed development:

Design Standard	Compliance
Significant natural features such as drainage courses, rock outcroppings, sensitive biological resources, and mature trees should be preserved to the greatest extent possible and incorporated into the development design.	The open space located south of Pomerado Road and north of the project's grading footprint would be preserved. With the proposed MHPA boundary line adjustment, 1.87 acres would be removed from the MHPA and 7.46 acres of land would be added as MHPA and dedicated to the MHPA via a Conservation Easement. As a result of this on-site land exchange, the MHPA land on-site would total 9.90 acres. The proposed MHPA boundary line adjustment would be beneficial to the overall MHPA preserve at this location due to an increase in Tier II habitat and acreage of preserved land.
Development should avoid large areas containing steep hillsides with a natural gradient in excess of 200 percent, except that: (1) Access to the site may encroach into these steep hillsides only if no other feasible means of access to the property exists, and (2) Development may encroach into these steep hillsides if there are no other areas that are feasible for development or the area with these steep hillsides constitutes a minor portion of the entire site.	The project site does not contain large areas containing steep hillsides. The proposed access from Chabad Center Driveway and fire access adjacent to Alliant International University would not encroach into steep hillsides. Additionally, the area of steep hillsides is a minor portion of the site, 3.71 acres of a 53-acre site.
Areas of existing natural topography should be integrated into the design of the development.	Every effort was made to maintain the existing natural topography. However, given that a CCRC houses senior citizens, Americans with Disabilities Act compliance is required throughout the site.
Priority should be given to the preservation of steep hillsides that are located adjacent to areas designated as open space.	The encroachment that occurs within steep hillsides is adjacent to MCAS Miramar. The project would not encroach into hillsides adjacent to Carroll Canyon open space.
When the top of a steep hillside is cut and fill is placed on the hillside, the fill slope should be blended with the natural steep hillside.	The encroachment into steep hillsides would include only cut.

Standard 2: The development shall be designed to minimize grading.

This standard may be achieved by incorporating into the development design the following guidelines, as appropriate, for the site conditions and the proposed development:

Design Standard	Compliance
Streets and driveways should follow the contours of the natural terrain.	Every effort was made to maintain areas of existing topography; however, as discussed previously, Americans with Disabilities Act compliance is required throughout the site. The driveway adjacent to the steep hillsides would be required to comply with turnaround fire access.
The use of all areas of the site that do not contain steep hillsides should be maximized prior to encroaching into any steep hillside areas.	With the exception of the encroachment into the steep hillsides located southwest of the property line, the remaining portion of the site does not contain steep hillsides as defined by the City's Steep Hillside Guidelines.
Retaining walls could be used to reduce the total extent of grading in the steep hillside areas, subject to the following:	
1. The maximum height of a single retaining wall located adjacent to natural steep hillsides designated as open space or adjacent to major and secondary streets and highways or sidewalks, measured from grade to grade, shall be 10 feet. When the overall retained height would exceed 10 feet, the retaining wall shall be broken into multiple stepped walls, with no individual wall height exceeding 10 feet. A minimum horizontal distance of 3 feet shall be maintained between each individual wall in the stepped wall system and shall be landscaped.	The retaining walls proposed adjacent to steep hillsides would be eight feet high and would only be visible from within the project.
2. Gravity retaining walls could be used, regardless of height, provided that landscaping and irrigation is installed in the face of the wall.	No gravity retaining walls are required for the project.
3. Narrow, single-loaded, and/or split-level streets and driveways could be utilized where possible.	The driveway near the steep hillsides would be required to have a turnaround for fire access.
Shared access to adjacent lots could be used to reduce the amount of grading required for driveways.	Both the main entrance access and fire access would be shared.
Development areas should be located at varying elevations to respect the existing contours of the site.	Every effort was made to maintain areas of existing topography; however, as discussed previously, Americans with Disabilities Act compliance is required throughout the site. The driveway adjacent to the steep hillsides would be required to comply with turnaround fire access.
The size and shape of lots could be utilized to maximize the amount of steep hillsides to be preserved.	The project is currently one lot. An MHPA lot would be created with the project.

Standard 3: Graded areas shall be designed to blend with existing or planned adjacent topography.

This standard may be achieved by incorporating into the development design the following guidelines, as appropriate, for the site conditions and the proposed development:

Design Standard	Compliance
If located adjacent to natural topography or manufactured slopes that are landform graded, newly created manufactured slopes should be landform graded with undulating slopes, irregular/varying gradients, and with the top (crest) and bottom (toe) of new manufactured slopes rounded to resemble natural landforms.	Undulating slopes would be provided where feasible.
The transition between manufactured slopes and natural topography should be blended to avoid harsh angular lines.	The project would blend with the gradual transitions. No harsh angular lines are proposed.
Landscaping on manufactured slopes adjacent to natural topography should be similar to the vegetation on the natural slopes.	Hydroseed mix is proposed on manufactured slopes. Refer to the landscape concept plan.
Slopes that are adjacent to major and secondary streets and highways and slopes in areas designated as significant public view areas should always be landform graded regardless of the adjacent topography.	Steep slopes would not be in close proximity to major and secondary streets and highways. However, the slope approximately 400 feet away from Pomerado Road has been designed to maintain public views. Building placements as well as a pedestrian path along the proposed MHPA open space are proposed to preserve views.

Standard 4: Site improvements shall be designed and sited to minimize impacts to the steep hillside areas.

This standard may be achieved by incorporating into the development design the following guidelines, as appropriate, for the site conditions and the proposed development:

Design Standard	Compliance
Development should be concentrated in the least steep areas of the site in order to preserve as much of the natural terrain as possible.	The majority of the site does not include steep slopes. Every effort was made to maintain areas of existing topography; however, as discussed previously, Americans with Disabilities Act compliance is required throughout the site. The driveway adjacent to the steep hillsides would be required to comply with turnaround fire access.
The design and placement of site improvements should take into consideration the location surrounding developments.	The proposed development would tie into existing utilities with the surrounding developments.
Parking located near the top of steep hillside areas should be set back from the edge of steep hillsides or buffered with a combination of berms and landscaping.	No parking is proposed near the top of steep hillsides.
Parking areas should be terraced to reflect existing topography.	Parking areas would be placed strategically throughout the site to comply with Americans with Disabilities Act accessibility.
Parking structures could be used to reduce the amount of graded surface parking needed.	Parking structures are not feasible for this type of use.
Multiple small parking lots at different levels could be utilized instead of one large parking lot.	Parking areas would be placed strategically throughout the site to comply with Americans with Disabilities Act accessibility.

Standard 5: The design and placement of structures on the site shall respect the steep hillside character of the site.

This standard may be achieved by incorporating into the development design the following guidelines, as appropriate, for the site conditions and the proposed development:

Design Standard	Compliance
Structures built at the top of a steep hillside or rim of a canyon should be low in profile and stepped back from the steep hillside area.	The development is not proposed on top of steep hillsides. Site sections have been provided for visual analysis.
The use of reflective building materials should be minimized.	The project would minimize the use of reflective building materials.
Structures could be utilized to screen high retaining walls and extensive manufactured slopes.	Proposed retaining walls would not be visible external to the site.
When located near the top of steep hillside areas, buildings should be situated so that landscaped parking areas may serve as a buffer between the steep hillside area and the building.	The development is not proposed on top of steep hillsides. Site sections have been provided for visual analysis.
When a structure is built on a steep hillside, it should be stepped to follow the natural line of the existing topography.	The development is not proposed on top of steep hillsides. Site sections have been provided for visual analysis.

4.7.7.2 Significance of Impacts

The project would alter more than 2,000 cubic yards of earth per graded acre, encroach into 3.34 acres of steep slopes, and create manufactured slopes in excess of 10 feet. The Steep Hillside Guidelines contain design standards that must be incorporated into the project design, and projects proposing to encroach into steep hillsides shall demonstrate that all design standards have been incorporated and have resulted in the most sensitive design possible. As demonstrated, the project has been designed in accordance the Steep Hillside Guidelines, and impacts associated with landform alteration would be less than significant.

4.7.7.3 Mitigation, Monitoring, and Reporting

Impacts would be less than significant. No mitigation is required.

4.8 Health and Safety/Hazardous Materials

The potential for hazardous materials affecting public health and safety within the project site was evaluated in a Phase I Preliminary Environmental Site Assessment (ESA) prepared by Leighton and Associates, Inc. (Appendix I). The investigation included a review of regulatory agency databases, records review, interviews, review of aerial photographs, limited visual site reconnaissance, and review of site history to identify potential environmental concerns.

4.8.1 Existing Conditions

4.8.1.1 Federal, State, and Regional Regulations

Numerous federal, state, and local laws and regulations regarding hazardous materials have been developed with the intent of protecting public health, the environment, surface water, and groundwater resources. Over the years, the laws and regulations have evolved to deal with different aspects of the handling, treatment, storage, and disposal of hazardous substances. Relevant laws and regulations include:

- Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) of 1980, also known as “Superfund,” and the Superfund Amendments and Reauthorization Act (SARA) of 1986 (amended CERCLA, SARA Title III). CERCLA, SARA Title III provide a federal framework for setting priorities for cleanup of hazardous substances releases to air, water, and land. This framework provides for the regulation of the cleanup process, cost recovery, response planning, and communication standards.

- Federal Resource Conservation and Recovery Act of 1976. This act established the authority of the U.S. Environmental Protection Agency (EPA) to develop regulations to track and control hazardous substances from their production, through their use, to their disposal.

- The California Division of OSHA and federal OSHA define and enforce worker safety standards and require proper handling and disposal of hazardous materials according to OSHA and EPA and regulations.

These acts established the authority of the EPA to develop regulations to track and control hazardous substances from their production, through their use, and ultimately to their disposal. These acts also provided a framework for setting priorities for cleanup of hazardous substances and set the precedent for states and local authorities to do the same. Applicable regulatory agencies have kept records on hazardous materials storage, use, and disposal, and make these lists publicly available. Locally, these include the San Diego County Environmental Assessment Listing and the State Department of Toxic Substances Control List.

The SDFD screens inventories of substances and inspects sites annually. The County Health Department screens inventories, inspects facilities every 15 months, and reviews Hazardous Materials Business Plans (required for businesses handling hazardous materials), and the SDAPCD evaluates projects for possible toxic emissions and issues permits as necessary.

In regard to worker safety, the federal and state OSHA regulate emissions standards and handling procedures for workers coming into potential contact with hazardous materials. These regulations ensure that safety standards and potential risks, for example to asbestos or lead exposure, are considered and remediated in accordance with the National Emissions Standards for Hazardous Air Pollutants, OSHA, and other applicable state and local regulations.

4.8.1.2 Phase I ESA Results

A Phase I ESA included a visual reconnaissance of the subject property exterior, interviews, review of historical aerial photographs, and a review of the practically available pertinent records of local, state, and federal agencies. The results of the Phase I ESA concerning hazardous materials on the project site are summarized below:

- A reconnaissance level assessment of the project site was conducted. No evidence of aboveground storage tanks, underground storage tanks, Polychlorinated Biphenyls, discolored soils, or other potential recognized environmental conditions (RECs) were identified.

- A government agency database search was conducted. The project site was not identified in the database search.

- Nearby sites were also evaluated in the government agency database search. Two facilities were identified in the search: Alliant International University and Nexcycle.

  Alliant International University is listed as a small quantity generator of medical wastes and a handler of hazardous wastes (asbestos-containing material, batteries, waste oils, laboratory waste chemicals, and paints). Several minor violations are listed in the database report for improperly labeling hazardous waste containers and not maintaining hazardous material manifests for three years. Additionally, in 2012, 2,800 gallons of raw sewage was released from a clogged sewer line into a dry creek. The release was contained in the creek bed and removed along with contaminated soil. Alliant International University does not release hazardous substances, and has a low potential to adversely impact the subject site.

  Nexcycle, located approximately half a mile west of the project site, is a recycler of household wastes (i.e., aluminum, glass, and plastic). No violations or other information is listed in the database report. Nexcycle does not release hazardous substances and has a low potential to adversely impact the subject site.

- File review requests were made from regulatory agencies including the Department of Toxic Substances Control, the State Water Resources Control Board, the RWQCB, the SDAPCD, the County of San Diego Department of Environmental Health, and the SDFD. No on- or off-site RECs were identified that would negatively impact the project site.

- A historical aerial photograph and records review was performed. Historically, the project site has been vacant, undeveloped land. Between 1974 and 1980, the central portion of the project site was developed as a football field and track. Prior to 1990 until the present, the central portion of the subject site was developed as a baseball field and unimproved playing field. No new potential RECs or historical RECs were identified during the historical records review.

4.8.1.3 Emergency Response/Evacuation

The San Diego Emergency Plan was adopted by the City Council in June 1974 subsequent to the City Council enacting the Emergency Services Ordinance in February of 1974. The plan provides for the effective mobilization of all the resources of San Diego, both public and private, to meet any condition constituting a local emergency and provide for the organization, powers and duties, services, and staff of the emergency organization. The purpose of the plan is to:

- Provide a basis for the conduct and coordination and the management of critical resources during emergencies.

- Establish a mutual understanding of the authority, responsibilities, functions, and operations of civil government in San Diego during an emergency.

- Provide a basis for incorporating emergency organization into those non-governmental agencies and organizations having resources necessary to meet foreseeable emergency requirements.

During peacetime and wartime emergencies, the emergency plan sets forth operational concepts and schedules, and assigns tasks and responsibilities to each of the units of the emergency organization. The plan takes effect if:

- A state of war emergency exists.

- The governor has proclaimed a state of emergency in an area including San Diego.

- The mayor or the director of emergency services orders, provided that the existence or threatened existence of a local emergency has been proclaimed in accordance with the provisions of the Emergency Services Ordinance.

The Office of Emergency Services coordinates the overall county response to disasters and is responsible for alerting and notifying appropriate agencies when disaster strikes, coordinating all agencies that respond, ensuring resources are available and mobilized in times of disaster,

developing plans and procedures for response to and recovery from disasters, and developing and providing preparedness materials for the public.

4.8.1.4 Wildfire Risk

The potential wildfire risk zones are areas that have steep slopes, limited precipitation, and plenty of available vegetation fuel. Currently, the project site is undeveloped and occupied by a variety of vegetation communities and is subject to risk of wildfire due to its location adjacent to natural open space to the south (MCAS Miramar).

Current San Diego regulations require that brush management zones be established adjacent to development to reduce the risk from wildland fires. The adopted LDC requires a Brush Management Program for development projects. The purpose of such a program is to reduce the risk of wildfire while minimizing visual, biological, and erosion impacts to natural areas. Two brush management zones are typically included. Zone 1 typically consists of brush clearance (native species shall be regularly pruned to reduce excessive fuel) and ornamental plantings (including native plant species) with permanent irrigation. Zone 2 typically involves the selective thinning and pruning of native vegetation.

4.8.2 Significance Determination Thresholds

Based on the City's 2011 Significance Determination Thresholds, impacts associated with public health and safety/hazardous materials would be significant if the project would:

1. Result in hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within a quarter-mile of an existing or proposed school;

2. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazards to the public or environment and expose people to potential health hazards;

3. Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan;

4. Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including when wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.

4.8.3 Issue 1: Hazardous Material

Would the project result in hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within a quarter-mile of an existing or proposed school?

4.8.3.1 Impacts

The project is located within a quarter-mile of two schools: Alliant International University is adjacent to the western project boundary, and Chabad Center is adjacent to the eastern project boundary. Additionally, Marshall Middle School is located 0.4 mile to the west, and Jerabek Elementary School is located 0.3 mile to the northeast.

The construction of the project would require the transport, temporary storage, and use of asphalt fuels, paints, and solvents which could potentially be released and result in exposure to these chemicals. The use and handling of materials associated with the construction of the project would follow all applicable federal, state, and local regulations, including California OSHA, Caltrans, and Department of Health, Hazardous Materials Division. The project would comply with all applicable state and local regulations for hazardous materials and waste management during project construction.

The project would provide services specifically for patients with Alzheimer's disease or other types of dementia, as well as skilled nursing services such as giving injections, maintaining catheters, and doing colostomy care for residents. This would generate medical waste as defined by the California Medical Waste Act. However, the project would meet all licensing and permitting requirements set forth by the Community Care Licensing Division of the California Department of Social Services (State Licensing). Expired or leftover pharmaceuticals and other medical waste would be disposed of in an appropriate fashion according to the County of San Diego Medical Waste Program. The project would comply with all applicable state and local regulations, including community care state licensing requirements for handling of medical wastes and other hazardous materials. Therefore, impacts related to hazardous emissions, materials, substances, and wastes within a quarter-mile of a school would be less than significant.

4.8.3.2 Significance of Impacts

The project would comply with all applicable state and local regulations, including community care state licensing requirements, for handling of medical wastes and other hazardous materials. Compliance with these regulations would ensure that impacts to schools within a quarter-mile of the project would be less than significant.

4.8.3.3 Mitigation, Monitoring and Reporting

Impacts would be less than significant. No mitigation is required.

4.8.4 Issue 2: Hazardous Material Sites

Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or environment and expose people to potential health hazards?

4.8.4.1 Impacts

The project is not listed as a hazardous materials site compiled pursuant to Government Code Section 65962.5. The Phase I ESA found that no on-site or off-site RECs were identified. There are no existing buildings on the project site; thus, there is no potential for asbestos-containing materials or lead-based paints. Therefore, impacts associated with such sites would be less than significant.

4.8.4.2 Significance of Impacts

The project is not listed as a hazardous materials site compiled pursuant to Government Code Section 65962.5. No on-site or off-site RECs were identified. Therefore, impacts are less than significant.

4.8.4.3 Mitigation, Monitoring, and Reporting

Impacts would be less than significant. No mitigation is required.

4.8.5 Issue 3: Emergency Plans

Would the project impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?

4.8.5.1 Impacts

The project would be designed in accordance with applicable safety standards, including the preparation of a site-specific emergency evacuation plan. In addition to extra emergency exits throughout the buildings, all units would be provided with wireless emergency call systems. Proposed buildings would be constructed with fire-resistant construction materials and an extra protective system of sprinklers that exceed requirements for normal residential construction.

The main access road to the project site would be Chabad Center Driveway. Internal project roadways and a fire lane would be constructed per the City Fire Marshal's Standards and would provide adequate site access. This includes 26-foot-wide unobstructed fire access road requirements. All dead-end roadways would include adequate turnarounds for fire engines at the terminus and mid-point. The main fire and emergency access road would be Chabad Center Driveway. An additional fire access road would be provided at the end of the cul-de-sac at the northwest corner of the project site connecting to the neighboring Alliant International University property.

Primary evacuation routes consist of the major interstates, highways, and prime arterials within the City. A San Diego Emergency Plan, including an Evacuation Annex, is in place to provide for the effective mobilization of all the resources of San Diego. The project would not impair implementation of, or physically interfere with, the San Diego Emergency Plan. Additionally, the

project is subject to review by the SDFD and the SDPD to ensure compliance with applicable safety standards.

In regards to flooding, no structures would be inundated or affected by flood waters due to the project. The project proposes grading embankments and a detention basin within the existing 100-year floodplain. However, no structures would be located within the floodplain. The results of a floodplain analysis are discussed in further detail in Section 8.2.

4.8.5.2 Significance of Impacts

The project would be designed in accordance with applicable safety standards. The project would not impair implementation of, or physically interfere with, emergency response plans or emergency evacuation plans. Impacts would be less than significant.

4.8.5.3 Mitigation, Monitoring, and Reporting

Impacts would be less than significant. No mitigation is required.

4.8.6 Issue 4: Wildland Fires

Would the project expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including when wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

4.8.6.1 Impacts

The project site is subject to risk of wildfire due to its location adjacent to natural open space to the south (MCAS Miramar). As shown in Figure 3-3, a brush management plan has been prepared for the project based on the requirements of the LDC and San Diego Fire Prevention Bureau Policy B-08-1. The brush management plan would encompass 7.3 acres.

There are two zones of vegetation in the brush management plan. BMZ 1 would be designed to be the least flammable area around the proposed structures with permanently irrigated ornamental planting. The ornamental planting is primarily turf and low-growing ornamental shrubs which would not exceed four feet in height. All trees would be located a minimum of 10 feet away from proposed structures. Irrigation would be designed to prevent overspray or runoff into adjacent areas of native or naturalized vegetation.

BMZ 2 planting would be composed of native, non-permanently irrigated, low-fuel, and fire-resistive vegetation. New planting would be selected so that maximum growth height at maturity would not be greater than two feet. Trees would be planted in a manner to reduce the possibility of fire being transmitted to habitable structures. A temporary irrigation system would be utilized until the drought-tolerant, fire-resistive native plantings have become established. BMZ 2 would be maintained on a regular basis by pruning and thinning plants and controlling weeds.

Brush management is required on all premises that are within 100 feet of a structure and contain native or naturalized vegetation. The standard BMZs widths are 35 feet for BMZ 1 and 65 feet for BMZ 2 as stated in Table 142-04h of the City of San Diego Municipal Code. The brush management zones have been tailored to be consistent with the proposed site design and accommodate for the putt and golf course along the northern perimeter and the paved parking lots along the eastern, southern, and western perimeters, where the BMZ 1 exceeds the standard 35 feet. In these areas, revegetation under the BMZ 2 standards listed in Section 142.0412 (h1-h7) is not possible, but the requirements under Section 142.0412 (b1) for BMZ 1 may be met. Therefore, per Section 142.0412(f), the option to increase BMZ 1 and reduce BMZ 2 has been employed, and BMZ 2 has been reduced at a 1.5:1 ratio for every one-foot increase in BMZ 1 over the 35-foot minimum resulting in a maximum BMZ 1 width of 80 feet and minimum BMZ 2 width of zero feet. After the zones have been modified, BMZ 1 will range from 35 feet to 80 feet and BMZ 2 will range from 0 feet to 65 feet. Therefore, some areas of brush management, along the western perimeter, fall short of the full BMZ 1 80-foot width requirement within the project boundary. In this case, the required BMZ 2 for the adjacent Alliant International University property currently overlaps continued BMZ 2 required outside the project's property line. This area of overlap in brush management is currently being maintained by Alliant University and is in compliance with the Landscape Regulations Section 142.0412 as part of the City of Municipal Code.

Given the compliance with San Diego's Landscape Regulations and San Diego Fire Prevention Bureau Policy B-08-1 requirements, the level of impacts associated with the risk of wildfire would be less than significant.

4.8.6.2 Significance of Impacts

Fire safety impacts would be less than significant with implementation of the brush management program, prepared in accordance with San Diego standards designed to prevent the risk of loss, injury, or death from wildfires.

4.8.6.3 Mitigation, Monitoring, and Reporting

Impacts would be less than significant. No mitigation is required.

4.9 Air Quality

An air quality technical report was completed by RECON in July 2014. The technical report addresses the potential for the project to emit air pollutants both during project construction and during post-construction daily project operations. The air quality technical report is summarized below and included in its entirety as Appendix J of this EIR.

4.9.1 Existing Conditions

The project site lies within the SDAB, which is regulated locally by the SDAPCD. Air quality at a given location is a function of the kinds and amounts of pollutants being emitted into the air locally and throughout the basin, and the dispersal rates of pollutants within the region. The major factors affecting pollutant dispersion are wind speed and direction, the vertical dispersion of pollutants (which is affected by inversions), and the local topography.

Air quality is commonly expressed as the number of days per year in which air pollution levels exceed federal standards set by the EPA or state standards set by CARB.

4.9.1.1 Existing Regulatory Framework

a. Federal Clean Air Act

The federal Clean Air Act (CAA) was enacted in 1970 (and amended several times since) for the purpose of protecting and enhancing the quality of the nation's air resources. In 1971, the federal EPA developed National Ambient Air Quality Standards (NAAQS) for six pollutants of concern: ozone, carbon monoxide (CO), sulfur dioxide (SO_2), nitrogen dioxide (NO_2), lead, and suspended PM_{10}. In 1997, the NAAQS were refined by replacing the one-hour ozone standard with an eight-hour ozone standard and by adding a new standard for suspended particulates 2.5 microns or less in diameter ($PM_{2.5}$). The current NAAQS are presented in Table 4.9-1 and represent the maximum levels of background pollution considered safe, with an adequate margin of safety, to protect public health and welfare considering long-term exposure of the most sensitive groups in the general population (i.e., children, senior citizens, and people with breathing difficulties).

b. California Clean Air Act

The EPA allowed states the option to develop different (stricter) air quality standards. Through the California CAA signed into law in 1988, the CARB has generally set more stringent limits on the seven criteria pollutants, as shown Table 4.9-1.

TABLE 4.9-1
AMBIENT AIR QUALITY STANDARDS

Pollutant	Averaging Time	California Standards[1]		Federal Standards[2]		
		Concentration[3]	Method[4]	Primary[3,5]	Secondary[3,6]	Method[7]
Ozone	1 Hour	0.09 ppm (180 µg/m^3)	Ultraviolet Photometry	–	Same as Primary Standard	Ultraviolet Photometry
	8 Hour	0.07 ppm (137 µg/m^3)		0.075 ppm (147 µg/m^3)		
Respirable Particulate Matter (PM_{10})[8]	24 Hour	50 µg/m^3	Gravimetric or Beta Attenuation	150 µg/m^3	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	20 µg/m^3		–		
Fine Particulate Matter ($PM_{2.5}$)[8]	24 Hour	No Separate State Standard		35 µg/m^3	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	12 µg/m^3	Gravimetric or Beta Attenuation	12 µg/m^3	15 µg/m^3	
Carbon Monoxide (CO)	1 Hour	20 ppm (23 mg/m^3)	Non-dispersive Infrared Photometry	35 ppm (40 mg/m^3)	–	Non-dispersive Infrared Photometry
	8 Hour	9.0 ppm (10 mg/m^3)		9 ppm (10 mg/m^3)	–	
	8 Hour (Lake Tahoe)	6 ppm (7 mg/m^3)		–	–	
Nitrogen Dioxide (NO_2)[9]	1 Hour	0.18 ppm (339 µg/m^3)	Gas Phase Chemi-luminescence	100 ppb (188 µg/m^3)	–	Gas Phase Chemi-luminescence
	Annual Arithmetic Mean	0.030 ppm (57 µg/m^3)		53 ppb (100 µg/m^3)	Same as Primary Standard	
Sulfur Dioxide (SO_2)[10]	1 Hour	0.25 ppm (655 µg/m^3)	Ultraviolet Fluorescence	75 ppb (196 µg/m^3)	–	Ultraviolet Fluorescence; Spectro-photometry (Pararosaniline Method)
	3 Hour	–		–	0.5 ppm (1,300 µg/m^3)	
	24 Hour	0.04 ppm (105 µg/m^3)		0.14 ppm (for certain areas)[9]	–	
	Annual Arithmetic Mean	–		0.030 ppm (for certain areas)[9]	–	
Lead[11,12]	30 Day Average	1.5 µg/m^3	Atomic Absorption	–	–	High Volume Sampler and Atomic Absorption
	Calendar Quarter	–		1.5 µg/m^3 (for certain areas)[11]	Same as Primary Standard	
	Rolling 3-Month Average	–		0.15 µg/m^3		
Visibility Reducing Particles[13]	8 Hour	See footnote 13	Beta Attenuation and Transmittance through Filter Tape	No Federal Standards		
Sulfates	24 Hour	25 µg/m^3	Ion Chroma-tography			
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m^3)	Ultraviolet Fluorescence			
Vinyl Chloride[11]	24 Hour	0.01 ppm (26 µg/m^3)	Gas Chroma-tography			

See footnotes on next page.

TABLE 4.9-1
AMBIENT AIR QUALITY STANDARDS
(continued)

ppm = parts per million; ppb = parts per billion; $\mu g/m^3$ = micrograms per cubic meter; – = not applicable.

[1]California standards for ozone, carbon monoxide (except 8-hour Lake Tahoe), sulfur dioxide (1 and 24 hour), nitrogen dioxide, particulate matter (PM_{10}, $PM_{2.5}$, and visibility reducing particles), are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.

[2]National standards (other than ozone, particulate matter, and those based on annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over three years, is equal to or less than the standard. For PM_{10}, the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 $\mu g/m^3$ is equal to or less than one. For $PM_{2.5}$, the 24-hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard. Contact the U.S. EPA for further clarification and current national policies.

[3]Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25°C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.

[4]Any equivalent measurement method which can be shown to the satisfaction of the Air Resources Board to give equivalent results at or near the level of the air quality standard may be used.

[5]National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.

[6]National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.

[7]Reference method as described by the U.S. EPA. An “equivalent method” of measurement may be used but must have a “consistent relationship to the reference method” and must be approved by the U.S. EPA.

[8]On December 14, 2012, the national annual $PM_{2.5}$ primary standard was lowered from 15 $\mu g/m^3$ to 12.0 $\mu g/m^3$. The existing national 24-hour $PM_{2.5}$ standards (primary and secondary) were retained at 35 $\mu g/m^3$, as was the annual secondary standards of 15 $\mu g/m^3$. The existing 24-hour PM_{10} standards (primary and secondary) of 150 $\mu g/m^3$ also were retained. The form of the annual primary and secondary standards is the annual mean, averaged over three years.

[9]To attain the 1-hour national standard, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 ppb. Note that the national standards are in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the national standards to the California standards the units can be converted from ppb to ppm. In this case, the national standards of 53 ppb and 100 ppb are identical to 0.053 ppm and 0.100 ppm, respectively.

[10]On June 2, 2010, a new 1-hour SO_2 standard was established and the existing 24-hour and annual primary standards were revoked. To attain the 1-hour national standard, the 3-year average of the annual 99^{th} percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO_2 national standards (24-hour and annual) remain in effect until one year after an area is designated for the 2010 standard, except that in areas designated nonattainment for the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved.

Note that the 1-hour national standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the 1-hour national standard to the California standard the units can be converted to ppm. In this case, the national standard of 75 ppb is identical to 0.075 ppm.

[11]The ARB has identified lead and vinyl chloride as ‘toxic air contaminants’ with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.

[12]The national standard for lead was revised on October 15, 2008 to a rolling 3-month average. The 1978 lead standard (1.5 $\mu g/m^3$ as a quarterly average) remains in effect until one year after an area is designated for the 2008 standard, except that in areas designated nonattainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.

[13]In 1989, the ARB converted both the general statewide 10-mile visibility standard and the Lake Tahoe 30-mile visibility standard to instrumental equivalents, which are “extinction of 0.23 per kilometer” and “extinction of 0.07 per kilometer” for the statewide and Lake Tahoe Air Basin standards, respectively.

The California CAA additionally requires that air quality management districts implement regulations to reduce emissions from mobile sources through the adoption and enforcement of transportation control measures. The California CAA requires that a district must (South Coast Air Quality Management District [SCAQMD] 2007):

- Demonstrate the overall effectiveness of their air quality program.
- Reduce nonattainment pollutants at a rate of 5 percent per year, or include all feasible measures and an expeditious adoption schedule.
- Reduce population exposure to severe nonattainment pollutants according to a prescribed schedule.
- Rank control measures by cost-effectiveness.

c. State Implementation Plan

The State Implementation Plan (SIP) is a collection of documents that set forth the state's strategies for achieving ambient air quality standards. The SDAPCD is responsible for preparing and implementing the portion of the SIP applicable to the SDAB. The SDAPCD adopts rules, regulations, and programs to attain state and federal air quality standards, and appropriates money (including permit fees) to achieve its objectives.

d. Regional Air Quality Strategy

The SDAPCD prepared the 1991/1992 Regional Air Quality Strategy (RAQS) in response to requirements set forth in the California CAA. Attached as part of the RAQS are the Transportation Control Measures (TCMs) adopted by SANDAG. Updates of the RAQS and corresponding TCM are required every three years. The RAQS and TCM set forth the steps needed to accomplish attainment of state and federal ambient air quality standards. The most recent update of the RAQS and TCM occurred in 2009.

4.9.1.2 Existing Air Quality in the Project Area

The SDAPCD maintains 11 air quality monitoring stations throughout the greater San Diego metropolitan region. Air pollutant concentrations and meteorological information are continuously recorded at these stations. Measurements are then used by scientists to help forecast daily air pollution levels. The San Diego–Overland Avenue monitoring station, located approximately 4.3 miles southwest of the project site, is the nearest station to the project area. The San Diego—Overland Avenue monitoring station measures ozone, NO_2, PM_{10}, and $PM_{2.5}$.

Table 4.9-2 summarizes the number of days per year during which state and federal standards were exceeded in the SDAB during the years 2009 to 2013. Table 4.9-3 summarizes the measurements collected at the San Diego–Overland Avenue monitoring station for the years 2009 through 2013.

TABLE 4.9-2
AMBIENT AIR QUALITY SUMMARY – SAN DIEGO AIR BASIN

Pollutant	Average Time	California Ambient Air Quality Standards[a]	Attainment Status	National Ambient Air Quality Standards[b]	Attainment Status[c]	Maximum Concentration					Number of Days Exceeding State Standard					Number of Days Exceeding National Standard				
						2009	2010	2011	2012	2013	2009	2010	2011	2012	2013	2009	2010	2011	2012	2013
O_3	1 hour	0.09 ppm	N	N/A	N/A	0.119	0.107	0.114	0.101	0.095	8	7	5	2	2	N/A	N/A	N/A	N/A	N/A
O_3	8 hours	0.07ppm	N	0.075 ppm	N	0.098	0.088	0.093	0.084	0.083	47	21	33	25	28	24	14	10	10	7
CO	8 hours	9 ppm	A	9 ppm	A	3.24	2.46	2.44	3.61	Na	0	0	0	0	Na	0	0	0	0	Na
NO_2	1 hour	0.18 ppm	A	0.100 ppm	A	0.091	0.091	0.100	0.077	0.091	0	0	0	0	0	0	0	0	0	0
NO_2	Annual	0.030 ppm	A	0.053 ppm	A	0.021	0.021	0.020	0.020	0.019	NX	NX	NX	NX	NX	NX	NX	NX	NX	NX
PM_{10}	24 hours	50 $\mu g/m^3$	N	150 $\mu g/m^3$	U	123.0	108.0	126.0	126.0	92.0	25/ 146.4*	22/ 136.0*	23/ 138.5*	6/6.1*	1/6.0*	0/0.0*	0/0.0*	0/0.0*	0/0.0*	0/0.0*
PM_{10}	Annual	20 $\mu g/m^3$	N	N/A	N/A	53.9	47.0	46.2	24.3	25.4	EX	EX	EX	EX	EX	--	--	--	--	--
$PM_{2.5}$	24 hours	N/A	N/A	35 $\mu g/m^3$	A	78.4	52.2	72.0	82.9	68.1	--	--	--	--	--	4/3.4*	2/2.0*	3/3.0*	2/1.0*	3/2.0*
$PM_{2.5}$	Annual	12 $\mu g/m^3$	N	15 $\mu g/m^3$	A	12.2	10.8	15.9	14.2	10.6	EX	NX	EX	EX	NX	NX	NX	EX	NX	NX

SOURCE: State of California 2014. California Air Quality Data Statistics. California Air Resources Board Internet Site. URL http://www.arb.ca.gov/adam/welcome.html.
NOTE: Data for SO_2 and 1-hour CO were not available.
*Measured Days/Calculated Days - Calculated days are the estimated number of days that a measurement would have been greater than the level of the standard had measurements been collected every day. The number of days above the standard is not necessarily the number of violations of the standard for the year. Data to determine federal calculated days were not available.
[a]California standards for ozone, carbon monoxide (except at Lake Tahoe), sulfur dioxide (1-hour and 24-hour), nitrogen dioxide, and PM_{10} are values that are not to be exceeded. Some measurements gathered for pollutants with air quality standards that are based upon 1-hour, 8-hour, or 24-hour averages, may be excluded if the CARB determines they would occur less than once per year on average.
[b]National standards other than for ozone and particulates, and those based on annual averages or annual arithmetic means are not to be exceeded more than once a year. The 1-hour ozone standard is attained if, during the most recent 3-year period, the average number of days per year with maximum hourly concentrations above the standard is equal to or less than one.
[c]A = attainment; N = non-attainment; U = Unclassifiable; N/A = not applicable; Na = data not available; NX = annual average not exceeded; EX = annual average exceeded.
ppm = parts per million, $\mu g/m^3$ = micrograms per cubic meter.

TABLE 4.9-3
SUMMARY OF AIR QUALITY MEASUREMENTS RECORDED AT THE SAN DIEGO–OVERLAND AVENUE MONITORING STATION

Pollutant/Standard	2009	2010	2011	2012	2013
Ozone					
Days State 1-hour Standard Exceeded (0.09 ppm)	2	2	1	0	Na
Days State 8-hour Standard Exceeded (0.07 ppm)	3	3	3	0	Na
Days '08 Federal 8-hour Standard Exceeded (0.075 ppm)	1	0	1	0	Na
Max. 1-hr (ppm)	0.105	0.100	0.097	0.050	Na
Max 8-hr (ppm)	0.082	0.074	0.087	0.047	Na
Nitrogen Dioxide					
Days State 1-hour Standard Exceeded (0.18 ppm)	0	0	0	0	Na
Max 1-hr (ppm)	0.060	0.073	0.073	0.055	Na
Annual Average (ppm)	0.014	0.013	0.012	Na	Na
PM_{10}*					
Measured Days State 24-hour Standard Exceeded (50 $\mu g/m^3$)	0	0	0	0	Na
Calculated Days State 24-hour Standard Exceeded (50 $\mu g/m^3$)	0	0	0	0	Na
Measured Days Federal 24-hour Standard Exceeded (150 $\mu g/m^3$)	0	0	0	0	Na
Calculated Days Federal 24-hour Standard Exceeded (150 $\mu g/m^3$)	0	0	0	0	Na
Max. Daily ($\mu g/m^3$)	50.0	33.0	47.0	22.0	Na
State Annual Average ($\mu g/m^3$)	24.9	18.7	20.3	Na	Na
Federal Annual Average ($\mu g/m^3$)	24.7	18.6	20.2	8.8	Na
$PM_{2.5}$*					
Measured Days '97 Federal 24-hour Standard Exceeded (65 $\mu g/m^3$)	0	0	0	0	Na
Calculated Days '97 Federal 24-hour Standard Exceeded (65 $\mu g/m^3$)	0	0	0	0	Na
Measured Days '06 Federal 24-hour Standard Exceeded (35 $\mu g/m^3$)	0	0	0	0	Na
Calculated Days '06 Federal 24-hour Standard Exceeded (35 $\mu g/m^3$)	0	0	0	0	Na
Max. Daily ($\mu g/m^3$)	25.1	18.7	29.9	20.0	Na
State Annual Average ($\mu g/m^3$)	10.5	8.7	9.0	Na	Na
Federal Annual Average ($\mu g/m^3$)	10.5	8.7	8.9	Na	Na

SOURCE: State of California 2014
Na = Not available. The San Diego—Overland Avenue monitoring station was closed after 2012.
*Calculated days value. Calculated days are the estimated number of days that a measurement would have been greater than the level of the standard had measurements been collected every day. The number of days above the standard is not necessarily the number of violations of the standard for the year.

a. Ozone

Nitrogen oxides and hydrocarbons (reactive organic gases [ROGs]) are known as the chief "precursors" of ozone. These compounds react in the presence of sunlight to produce ozone. Ozone is the primary air pollution problem in the SDAB. Because sunlight plays such an important role in its formation, ozone pollution, or smog, is mainly a concern during the daytime in summer months.

About half of smog-forming emissions come from vehicles. More strict automobile emission controls, including more efficient automobile engines, have played a large role in the steady decrease in ozone levels in the SDAB since the late 1970s.

In the SDAB overall, during the five-year period of 2009 to 2013, the revised 2008 national 8-hour standard of 0.075 was exceeded 24 days in 2009, 14 days in 2010, 10 days in 2011, 10 days in 2012, and 7 days in 2013. The stricter state 8-hour ozone standard of 0.07 ppm was exceeded 47 days in 2009, 21 days in 2010, 33 days in 2011, 25 days in 2012, and 28 days in 2013.

Also during the five-year period of 2009 to 2013, the state 1-hour standard (0.09 ppm) was exceeded 8 days in 2009, 7 days in 2010, 5 days in 2011, 2 days in 2012, and 2 days in 2013.

At the San Diego—Overland Avenue monitoring station, the national 8-hour ozone standard of 0.075 ppm was exceeded 1 day in 2009 and 1 day in 2011, and the state 8-hour ozone standard of 0.07 ppm was exceeded 3 days in 2009, 3 days in 2010, and 3 days in 2011. The state 1-hour ozone standard of 0.09 ppm was exceeded 2 days in 2009, 2 days in 2010, and 1 day in 2011.

Not all of the ozone within the SDAB is derived from local sources. Under certain meteorological conditions, such as during Santa Ana wind events, ozone and other pollutants are transported from the Los Angeles Basin and combine with ozone formed from local emission sources to produce elevated ozone levels in the SDAB.

Local agencies can control neither the source nor the transport of pollutants from outside the air basin. The SDAPCD's policy, therefore, has been to control local sources to reduce locally produced emissions. Through its TCMs, enhanced motor vehicle inspection and maintenance program overseen by the Bureau of Automotive Repair, and the clean-fuel vehicle program overseen by CARB, continuing reductions in ozone concentrations are anticipated.

Actions that have been taken in the SDAB to reduce ozone concentrations include:

- **TCMs if vehicle travel and emissions exceed attainment demonstration levels.** TCMs are strategies that will reduce transportation-related emissions by reducing vehicle use or improving traffic flow.

- **Enhanced motor vehicle inspection and maintenance program.** The smog check program is overseen by the Bureau of Automotive Repair. The program requires most vehicles to pass a smog test once every two years before registering in the state of California. The smog check program monitors the amount of pollutants automobiles produce. One focus of the program is identifying "gross polluters," or vehicles that exceed two times the allowable emissions for a particular model. Regular maintenance and tune-ups, changing the oil, and checking tire inflation can improve gas mileage and lower air pollutant emissions. It can also reduce traffic congestion due to preventable breakdowns, further lowering emissions.

- **Air Quality Improvement Program (AQIP).** The AQIP, established by Assembly Bill 118, is a voluntary incentive program administered by CARB to fund clean vehicle and equipment projects, research on biofuels production and the air quality impacts of alternative fuels, and workforce training.

b. Carbon Monoxide

The SDAB is classified as a state attainment area and as a federal maintenance area for CO (County of San Diego 1998). Until 2003, no violations of the state standard for CO had been recorded in the SDAB since 1991, and no violations of the national standard had been recorded in the SDAB since 1989. The violations that took place in 2003 were likely the result of massive wildfires that occurred throughout the county. No violations of the state or federal CO standards have occurred since 2003. As shown in Table 4.9-2, of the available data, the state and national standards have not been exceeded in the SDAB during the five-year period from 2009 to 2013.

Small-scale, localized concentrations of CO above the state and national standards have the potential to occur at intersections with stagnation points, such as those that occur on major highways and heavily traveled and congested roadways. Localized high concentrations of CO are referred to as "CO hot spots" and are a concern at congested intersections, where automobile engines burn fuel less efficiently and their exhaust contains more CO.

c. PM_{10}

PM_{10} is particulate matter with an aerodynamic diameter of 10 microns or less. Ten microns is about one-seventh of the diameter of a human hair. Particulate matter is a complex mixture of very tiny solid or liquid particles composed of chemicals, soot, and dust. Sources of PM_{10} emissions in the SDAB consist mainly of urban activities, dust suspended by vehicle traffic, and secondary aerosols formed by reactions in the atmosphere.

Under typical conditions (i.e., no wildfires), particles classified under the PM_{10} category are mainly emitted directly from activities that disturb the soil, including travel on roads and construction, mining, or agricultural operations. Other sources include windblown dust, salts, brake dust, and tire wear (County of San Diego 1998). For several reasons hinging on the

area's dry climate and coastal location, the SDAB has special difficulty in developing adequate tactics to meet present state particulate standards.

The SDAB is designated as federal unclassified and state nonattainment for PM_{10}. The measured federal PM_{10} standard was exceeded once in 2007 and once in 2008 in the SDAB. The 2007 exceedance occurred on October 21, 2007, at a time when major wildfires were raging throughout the County. Consequently, this exceedance was likely caused by the wildfires and would be beyond the control of the SDAPCD. As such, this event is covered under the U.S. EPA's Natural Events Policy that permits, under certain circumstances, the exclusion of air quality data attributable to uncontrollable natural events (e.g., volcanic activity, wild land fires, and high wind events). The 2008 exceedance did not occur during a wildfire and is not covered under this policy. The stricter state standard was exceeded a calculated number of 146.4 days in 2009, 136.0 in 2010, 138.5 in 2011, 6.1 in 2012, and 6.0 in 2013. Calculated days are the estimated number of days that a measurement would have been greater than the level of the standard, had measurements been collected every day. Particulate measurements are collected every six days.

At the San Diego—Overland Avenue monitoring station, the national and state 24-hour PM_{10} standards were not exceeded during the years 2009 through 2013.

d. $PM_{2.5}$

Airborne, inhalable particles with aerodynamic diameters of 2.5 microns or less have been recognized as an air quality concern requiring regular monitoring. Federal regulations required that $PM_{2.5}$ monitoring begin January 1, 1999 (County of San Diego 1999). The Chula Vista monitoring station is one of five stations in the SDAB that monitors $PM_{2.5}$. Federal $PM_{2.5}$ standards established in 1997 include an annual arithmetic mean of 15 $\mu g/m^3$ and a 24-hour concentration of 65 $\mu g/m^3$. As discussed above, the 24-hour $PM_{2.5}$ standard has been changed to 35 $\mu g/m^3$. State $PM_{2.5}$ standards established in 2002 are an annual arithmetic mean of 12 $\mu g/m^3$.

The SDAB was classified as an attainment area for the previous federal 24-hour $PM_{2.5}$ standard of 65 $\mu g/m^3$ and has also been classified as an attainment area for the revised federal 24-hour $PM_{2.5}$ standard of 35 $\mu g/m^3$ (U.S. EPA 2004, 2009). The SDAB is a non-attainment area for the state $PM_{2.5}$ standard (State of California 2005a). The calculated days the federal $PM_{2.5}$ standard was exceeded was 3.4 days in 2009, 2.0 days in 2010, 3.0 days in 2011, 1.0 days in 2012, and 2.0 days in 2013 in the SDAB.

At the San Diego—Overland Avenue monitoring station, the national 24-hour $PM_{2.5}$ standards were not exceeded during the years 2009 through 2013.

e. Other Criteria Pollutants

The national and state standards for NO_2, sulfur oxide (SO_x), and lead are being met in the SDAB, and the latest pollutant trends suggest that these standards will not be exceeded in the foreseeable future. As discussed above, new standards for these pollutants have been adopted, and new designations for the SDAB will be determined in the future. The SDAB is also in attainment of the state standards for hydrogen sulfide, sulfates, vinyl chloride, and visibility-reducing particles.

4.9.2 Significance Determination Thresholds

Based on the City's 2011 Significance Determination Thresholds, impacts related to air quality would be significant if the project would:

1. Conflict or obstruct implementation of the San Diego RAQS or applicable portions of the State Implementation Plan.

2. Violate any air quality standard or contribute substantially to an existing or projected air quality violation.

3. Exceed 100 pounds per day of particulate matter (dust).

4.9.3 Issue 1: Air Quality Plan Implementation

Would the project conflict with or obstruct the implementation of the applicable air quality plan?

4.9.3.1 Impacts

As described above, the California CAA requires areas that are designated nonattainment of state ambient air quality standards to prepare and implement plans to attain the standards by the earliest practicable date. The SDAB is designated nonattainment for ozone. Accordingly, the RAQS was developed to identify feasible emission control measures and provide expeditious progress toward attaining the state ozone standards. The two pollutants addressed in the RAQS are volatile organic compounds and nitrous oxide (NOx), which are precursors to the formation of ozone. Projected increases in motor vehicle usage, population, and industrial growth create challenges in controlling emissions to maintain and further improve air quality. The RAQS, in conjunction with the TCM, were most recently adopted in 2009 as the air quality plan for the region.

The basis for these plans is the distribution of population in the region as projected by SANDAG. Growth forecasting is based in part on the land uses established by the San Diego General Plan. Normally, if a project is consistent with land use designated in the City's General Plan, it can be considered consistent with the growth assumptions in the RAQS (State of California 1989).

The proposed project is within an area designated for University use in the SMRCP. The project would amend the existing CUP to allow for the proposed development, and would require a redesignation from University to Institutional use in the SMRCP. The LDC Trip Generation Manual indicates that University uses generate 100 trips per acre. Thus, the proposed project, if developed as a University use, would generate approximately 5,300 trips. This is greater than the proposed trip generation of 1,880 ADT. Therefore, the project would not result in traffic generation in excess of specific community plan allocations. Because the project would result in fewer trips, project traffic would be accounted for in the SANDAG growth forecast. Therefore, it would not conflict with the goals and strategies in the RAQS or TCM. Impacts would be less than significant.

4.9.3.2 Significance of Impacts

Because the project would generate fewer trips than what is currently accounted for in the growth forecast in the General Plan, the project would be consistent with the growth assumptions of the RAQS and TCM. Thus, the project would not conflict with or obstruct implementation of these plans. Impacts would be less than significant.

4.9.3.3 Mitigation, Monitoring, and Reporting

Impacts would be less than significant. No mitigation is required.

4.9.4 Issue 2: Air Quality Violations

Would the project result in a violation of any air quality standard or contribute substantially to an existing or projected air quality violation?

4.9.4.1 Impacts

a. Construction Emissions

Construction-related pollutants result from dust raised during demolition and grading, emissions from construction vehicles, and chemicals used during construction. Fugitive dust emissions vary greatly during construction and are dependent on the amount and type of activity, silt content of the soil, and the weather. Vehicles moving over paved and unpaved surfaces, demolition, excavation, earth movement, grading, and wind erosion from exposed surfaces are all sources of fugitive dust. Construction operations are subject to the requirements established in Regulation 4, Rules 52, 54, and 55 of the SDAPCD's rules and regulations.

Typical construction equipment for projects of this type include dozers, rollers, scrapers, dewatering pumps, backhoes, loaders, paving equipment, delivery/haul trucks, jacking equipment, welding machines, and so on. Heavy-duty construction equipment is usually diesel powered. In general, emissions from diesel-powered equipment contain more nitrogen oxides, sulfur oxides, and particulate matter than gasoline-powered engines. However, diesel-powered engines generally produce less CO and less ROG than gasoline-powered engines.

Project construction would include the grading of 43.06 acres. Grading quantities would be balanced on-site, and there would be no import or export of soil. It was projected that construction would begin in 2014 and last until 2016. Construction emissions were modeled using the California Emissions Estimator Model (CalEEMod) computer program. Specific construction modeling parameters can be found in the air quality technical report (Appendix J). Standard dust control during grading operations would be implemented to reduce potential nuisance impacts and to ensure compliance with SDAPCD rules and regulations.

Table 4.9-4 shows the total projected construction maximum daily emission levels for each criteria pollutant. As seen in Table 4.9-4, the level of maximum daily construction emissions is projected to be less than the applicable thresholds for all criteria pollutants. Impacts would therefore be less than significant.

TABLE 4.9-4
SUMMARY OF WORST-CASE CONSTRUCTION EMISSIONS
(pounds per day)

Pollutant	2014	2015	SDAPCD Significance Thresholds[2]
ROG	11	88	137
NO_x	81	40	250
CO	53	47	550
SO_x[1]	0	0	250
PM_{10} Dust	18	4	–
PM_{10} Exhaust	4	2	–
PM_{10}	21	6	100
$PM_{2.5}$ Dust	10	1	–
$PM_{2.5}$ Exhaust	4	2	–
$PM_{2.5}$	13	3	55

[1]Emissions calculated by CalEEMod are for SO_2.
[2]Threshold for $PM_{2.5}$ was obtained from the SCAQMD.

b. Operation Emissions

Mobile source emissions would originate from project-generated traffic. Mobile source emissions due to implementation of the project were calculated using the CalEEMod model. In addition to traffic-generated emissions, the project would also result in on-site source emissions. These emissions would result from activities such as use of natural gas, fireplaces, or consumer products, and landscape maintenance activities. The project would not include any wood-burning fireplaces.

For the purposes of computing the emissions, it was projected that buildout of the project would occur in 2016. Since state and federal mandates will cause exhaust emissions per vehicle to continue to improve in the future, it is reasonable to assume that emissions would be greater in 2016 than in year 2030. Trip generation rates were obtained from the traffic report prepared for the project (Appendix D).

A summary of the area source and operation emissions for the project is shown in Table 4.9-5.

TABLE 4.9-5
PROJECT BUILDOUT (YEAR 2016) AVERAGE DAILY EMISSIONS TO THE SDAB
(pounds/day)

Season	Pollutant	Area Source Emission	Mobile Source Emission	Total Emission	SDAPCD Significance Threshold[2]
Summer	ROG	26	14	40	137
	NOx	0	12	12	250
	CO	38	55	93	550
	SOx[1]	0	0	0	250
	PM_{10}	0	8	8	100
	$PM_{2.5}$	0	2	2	55
Winter	ROG	26	16	42	137
	NOx	0	12	12	250
	CO	38	60	98	550
	SOx[1]	0	0	0	250
	PM_{10}	0	8	8	100
	$PM_{2.5}$	0	2	2	55

[1]Emissions calculated by CalEEMod are for SO_2.
[2]Threholds for ROG and $PM_{2.5}$ were obtained from the SCAQMD.

As shown in Table 4.9-5, project-generated emissions are projected to be less than the adopted significance thresholds. Air quality impacts due to operation of the project would therefore be less than significant.

c. Localized Carbon Monoxide Impacts

The potential for exposure of sensitive receptors to substantial pollutant concentrations was evaluated through analysis of localized carbon monoxide concentrations as well as toxic air emissions and odors. Small-scale, localized concentrations of CO above the state and national standards have the potential to occur near stagnation points of heavily traveled intersections. Localized, high concentrations of CO are referred to as “CO hot spots.” CO hot spots can occur when projects contribute traffic to area intersections. CO hot spots almost exclusively occur near intersections with LOS E or worse in combination with relatively high traffic volumes on all roadways.

A micro-scale CO hot spot analysis was performed at all study area intersections projected to operate at LOS E or F in the existing, near-term, and buildout condition in order to assess potential exposure of sensitive receptors to CO concentrations above the state and national standards as indicated in the traffic report. The following intersections are projected to operate at LOS E or F.

<u>Existing + Project:</u>

- Pomerado Road at Willow Creek Road

Near-term + Project

- Pomerado Road at Willow Creek Road

Year 2030 + Project

- Pomerado Road at Willow Creek Road
- Pomerado Road at Scripps Ranch Boulevard
- Pomerado Road at Avenida Magnifica

Worst-case emission factors calculated by the Emission Factors Model (EMFAC) and used in the hot spot analysis were for year 2012. Emissions of CO would be less at buildout than the existing condition because of state and federal mandates, which will cause exhaust emissions per vehicle to continue to improve in the future, as well as emission reductions that occur due to the replacement of older, more polluting vehicles in the fleet population. Using the existing worst-case emission factors along with Existing, Near-term, and Year 2030 plus project traffic volumes result in a worst-case CO hot spot analysis.

Concentrations were calculated for 20 receptors for each identified intersection. Calculation details can be found in the air quality technical report contained in Appendix J. Table 4.9-6 presents estimates of worst-case CO concentrations at the intersections.

Table 4.9-6 shows that estimates of one-hour CO concentrations at the intersections would range from 9.0 to 11.2 ppm, and the eight-hour CO concentrations range from 5.4 to 6.9 ppm. These one-hour CO concentrations are below the 20 ppm state standard and the 35 ppm national standard, and these eight-hour CO concentrations are below the state's 9 ppm standard. Therefore, no significant localized CO impacts would occur at area intersections as a result of the project. Impacts would be less than significant.

TABLE 4.9-6
MAXIMUM INTERSECTION CO CONCENTRATIONS*

	Existing + Project		Near-Term + Project		Year 2030 + Project					
	Pomerado Road & Willow Creek Road		Pomerado Road & Willow Creek Road		Pomerado Road & Willow Creek Road		Pomerado Road & Scripps Ranch Boulevard		Pomerado Road & Avenida Magnifica	
Receptor	1-hr	8-hr	1-hr	8-hr	1-hr	8-hr	1-hr	8-hr	1-hr	8-hr
1	10.6	6.5	10.6	6.5	10.9	6.7	10.9	6.7	10.5	6.4
2	10.6	6.5	10.6	6.5	10.8	6.7	10.8	6.7	10.4	6.4
3	10.6	6.5	10.6	6.5	10.8	6.7	10.8	6.7	10.4	6.4
4	10.4	6.4	10.5	6.4	10.8	6.7	10.8	6.7	10.3	6.3
5	10.5	6.4	10.5	6.4	10.8	6.7	10.8	6.7	10.3	6.3
6	10.8	6.7	10.9	6.7	11.0	6.8	10.9	6.7	10.5	6.4
7	10.2	6.2	10.2	6.2	11.2	6.9	10.8	6.7	10.2	6.2
8	10.3	6.3	10.3	6.3	10.8	6.7	10.4	6.4	9.9	6.0
9	10.4	6.4	10.4	6.4	10.8	6.7	10.4	6.4	10.0	6.1
10	10.3	6.3	10.3	6.3	10.8	6.7	10.4	6.4	10.0	6.1
11	10.3	6.3	10.3	6.3	10.9	6.7	10.5	6.4	10.1	6.2
12	10.5	6.4	10.5	6.4	11.0	6.8	10.6	6.5	10.2	6.2
13	9.5	5.7	9.5	5.7	9.5	5.7	9.3	5.6	9.2	5.5
14	9.6	5.8	9.6	5.8	9.6	5.8	9.3	5.6	9.2	5.5
15	9.8	6.0	9.8	6.0	9.6	5.8	9.5	5.7	9.4	5.7
16	9.6	5.8	9.6	5.8	9.6	5.8	9.4	5.7	9.3	5.6
17	9.4	5.7	9.4	5.7	9.4	5.7	9.2	5.5	9.2	5.5
18	9.7	5.9	9.7	5.9	9.3	5.6	9.0	5.4	9.0	5.4
19	9.7	5.9	9.7	5.9	9.6	5.8	9.5	5.7	9.4	5.7
20	9.5	5.7	9.5	5.7	9.6	5.8	9.4	5.7	9.3	5.6

*Assumes 8.7 ppm one-hour and 5.18 eight-hour background concentrations.

d. Toxic Air Emissions

Impacts due to exposure of sensitive receptors to diesel particulates from roadway traffic have the potential to occur if new sensitive land uses are placed within 500 feet of a freeway, urban road with 100,000 vehicles per day, or rural road with 50,000 vehicles per day. The project site is not located within 500 feet of a freeway or heavily traveled roadway; therefore, impacts due to exposure to mobile source air toxics would be less than significant. Additionally, the project would not create a new stationary source of toxic emissions or contribute a substantial amount of traffic to area roadways. Existing neighboring uses would not be exposed to significant toxic air emissions.

4.9.4.2 Significance of Impacts

a. Construction Emissions

As discussed above, maximum daily construction emissions are projected to be less than the applicable thresholds for all criterion pollutants. Construction impacts would be less than significant.

b. Operation Emissions

As discussed above and shown in Table 4.9-5, future emissions due to operation of the project are projected to be less than the applicable significance thresholds for all pollutants, and operational impacts would be less than significant.

c. Localized Carbon Monoxide Impacts

Impacts would be less than significant since CO concentrations would not exceed state or national standards.

d. Toxic Air Emissions

No significant toxic impacts, including those associated with diesel particulate matter, are anticipated for the existing or future sensitive receivers on-site or in the project vicinity. Impacts would be less than significant.

4.9.4.3 Mitigation, Monitoring, and Reporting

Impacts would be less than significant. No mitigation is required.

4.9.5 Issue 3: Particulate Matter

Would the project exceed 100 pounds per day of particulate matter (dust)?

4.9.5.1 Impacts

Fugitive dust is any solid particulate matter that becomes airborne directly or indirectly as a result of the activities of man or natural events (such as windborne dust), other than that emitted from an exhaust stack. Construction dust is comprised primarily of chemically inert particles that are too large to enter the human respiratory tract when inhaled.

Fugitive dust emissions vary greatly during construction and are dependent on the amount and type of activity, silt content of the soil, and the weather. Vehicles moving over paved and unpaved surfaces, demolition, excavation, earth movement, grading, and wind erosion from exposed surfaces are all sources of fugitive dust.

Fugitive dust emissions could be perceived as a nuisance to the immediate area. As required by Regulation 4, Rules 52, 54, and 55, of the SDAPCD's rules and regulations, dust generated during grading operations would be reduced. As shown in Tables 4.9-4 and 4.9-5, construction and operation of the project would not result in PM_{10} or $PM_{2.5}$ emissions exceeding 100 pounds per day.

4.9.5.2 Significance of Impacts

Construction and operation of the project would not result in PM_{10} or $PM_{2.5}$ emissions exceeding 100 pounds per day. Impacts would be less than significant.

4.9.5.3 Mitigation, Monitoring, and Reporting

Impacts would be less than significant. No mitigation is required.

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4.10 Greenhouse Gas Emissions

The following section addresses effects of the project with regard to GHG emissions and resultant global climate change. A GHG emissions analysis technical report was prepared for the project by RECON Environmental in August 2013. The results and conclusions are summarized below, and the report is included in its entirety as Appendix K of this EIR.

4.10.1 Existing Conditions

4.10.1.1 Regulatory Framework

A summary of some of the key programs and regulations concerning GHG emissions and climate change is presented below. Additional information on other programs and regulations is contained in Appendix K.

a. Federal

Climate Change Action Plan

The U.S. developed the Climate Change Action Plan (CCAP) in 1993, which consists of initiatives that involve all economic sectors and aims at reducing all significant GHG. The CCAP, backed by federal funding, cultivates cooperative partnerships between the government and the private sector to establish flexible and cost-effective ways to reduce GHG emissions within each sector. The CCAP encourages investments in new technologies, but also relies on previous actions and programs focused on saving energy, reducing transportation emissions, improving forestry management, and reducing waste.

In 2002, the U.S. set a goal to reduce its GHG Emissions Intensity (the ratio of GHG emissions to economic output) by 18 percent by 2012 through various reduction programs, including those identified in the CCAP. New programs included the Energy Star program, which labels energy efficient appliances and products, and the Green Power Partnership, which promotes replacing electricity consumption with green (i.e., renewable) energy sources.

CAFE Standards

The federal CAFE standards determine the fuel efficiency of certain vehicle classes in the U.S. While the standards had not changed since 1990, as part of the Energy and Security Act of 2007, the CAFE standards were increased in 2007 for new light-duty vehicles to 35 miles per gallon (mpg) by 2020. In May 2009, further plans were announced to increase CAFE standards to require light duty vehicles to meet an average fuel economy of 35.5 mpg by 2016. In August 2012, fuel economy standards were further increased to 54.5 mpg for cars and light-duty trucks by Model Year 2025. This will nearly double the fuel efficiency of those vehicles compared to vehicles currently on our roads. With improved gas mileage, fewer gallons of transportation fuel

would be combusted to travel the same distance, thereby reducing nationwide GHG emissions associated with vehicle travel.

Mandatory Reporting of GHGs Rule

Starting January 1, 2010, large emitters of heat-trapping gases began collecting GHG data and reporting their annual GHG emissions to the U.S. EPA. The purpose of the rule is to collect accurate and timely GHG data to inform future policy decisions. Under this reporting rule, approximately 10,000 facilities are covered, accounting for nearly 85 percent of the nation's GHG emissions. This mandatory reporting applies to fossil fuel and industrial GHG suppliers, motor vehicle and engine manufacturers, and facilities that emit 25,000 metric tons of CO_2 equivalent ($MTCO_2E$) or more per year. Vehicle and engine manufacturers outside of the light-duty sector are required to begin phasing in their GHG reporting starting with engine/vehicle model year 2011.

b. State

The State of California has a number of policies and regulations that are either directly or indirectly related to GHG emissions. Only those most relevant to land use development projects are included in this discussion.

Executive Order S-3-05

Executive Order (EO) S-3-05, signed by Governor Schwarzenegger on June 1, 2005, established the following GHG emission reduction targets for the state of California:

- By 2010, reduce GHG emissions to 2000 levels;
- By 2020 reduce GHG emissions to 1990 levels;
- By 2050 reduce GHG emissions to 80 percent below 1990 levels.

Assembly Bill 32

In response to EO S-3-05, the California legislature passed AB 32 (Nuñez), the "California Global Warming Solutions Act of 2006," which was signed on September 27, 2006. It requires the CARB to adopt rules and regulations that would reduce GHG emissions to 1990 levels by 2020. The CARB is also required to publish a list of discrete GHG emission reduction measures.

Climate Change Scoping Plan

As directed by AB 32, the Climate Change Scoping Plan prepared by CARB in December 2008 includes measures to reduce statewide GHG emissions to 1990 levels by 2020. These reductions are what CARB identified as necessary to reduce forecasted business as usual (BAU) 2020 emissions. CARB will update the Scoping Plan at least once every five years to allow evaluation of progress made and to correct the Scoping Plan's course where necessary.

In 2008, CARB estimated annual BAU 2020 emissions to reach 596 million $MTCO_2E$ ($MMTCO_2$). To achieve 1990 emissions levels of 427 $MMTCO_2E$, a 169 $MMTCO_2E$ reduction was thus determined to be needed by 2020. As indicated in Table 4.10-1, the majority of reductions is directed at the sectors with the largest GHG emissions contributions—transportation and electricity generation—and involve statutory mandates affecting vehicle or fuel manufacture, public transit, and public utilities.

CARB also lists several other recommended measures which will contribute toward achieving the 2020 statewide reduction goal, but whose reductions are not (for various reasons, including the potential for double counting) additive with the measures listed in Table 4.10-1. These include state and local government operations measures, green building, mandatory commercial recycling and other additional waste and recycling measures, water sector measures, and methane (CH_4) capture at large dairies.

In 2010, CARB revised its 2020 BAU projections to account for the economic downturn and other factors. CARB's revised estimate calculated that BAU 2020 emissions would reach approximately 545 $MMTCO_2E$, without the Scoping Plan reduction measures (Light-duty Vehicle GHG Emissions Standards and the Renewable Portfolios Standard [RPS]), accounting for 38 $MMTCO_2E$. The new 2020 baseline emissions (accounting for Pavley I and the RPS) would be approximately 507 $MMTCO_2E$ per year. Thus, in order to reach the 1990 emissions level of 427 $MMTCO_2E$, an 80 $MMTCO_2E$ reduction was determined to be needed by 2020 (CARB 2010a).

TABLE 4.10-1
CARB SCOPING PLAN-RECOMMENDED GHG REDUCTION MEASURES

Recommended Reduction Measures	Reductions Counted Towards 2020 Target In $MMTCO_2E$	(% total) [2]
ESTIMATED REDUCTIONS RESULTING FROM THE COMBINATION OF CAPPED SECTORS AND COMPLEMENTARY MEASURES	**146.7**	
California Light-Duty Vehicle Greenhouse Gas Standards • Implement Pavley Standards • Develop LEV III light-duty vehicle standards	31.7	(22%)
Energy Efficiency • Building/appliance efficiency, new programs, etc. • Increase CHP generation by 30,000 gigaWatts (GWh) • Solar Water Heating (AB 1470 goal)	26.3	(18%)
Renewables Portfolio Standard (RPS) (33% by 2020)	21.3	(14%)
Low Carbon Fuel Standard	15.0	(10%)
Regional Transportation-related GHG Targets[1]	5.0	(4%)
Vehicle Efficiency Measures	4.5	(3%)
Goods Movement • Ship Electrification at Ports • System-Wide Efficiency Improvements	3.7	(3%)
Million Solar Roofs	2.1	(2%)
Medium/Heavy Duty Trucks • Heavy-Duty Vehicle Greenhouse Gas Emissions Reduction (Aerodynamic Efficiency) • Medium- and Heavy-Duty Vehicle Hybridization	1.4	(<1%)
High Speed Rail	1.0	(<1%)
Industrial Measures (for sources covered under cap & trade program) • Refinery Measures • Energy Efficiency and Co-Benefits Audits	0.3	(<.5%)
Additional Reductions Necessary to Achieve the Cap	34.4	(23%)
ESTIMATED REDUCTIONS RESULTING FROM UNCAPPED SECTORS	**27.3**	
Industrial Measures (for sources not covered under cap & trade program) • Oil and Gas Extraction and Transmission	1.1	
High Global Warming Potential Gas Measures	20.2	
Sustainable Forests	5.0	
Recycling and Waste (landfill methane capture)	1.0	
TOTAL REDUCTIONS COUNTED TOWARDS 2020 TARGET	**174.0**[3]	

SOURCE: Table 2 of CARB 2008.

[1]This number represents an estimate of what may be achieved from local land use changes. It is not the Senate Bill 375 regional target. CARB will establish regional targets for each Metropolitan Planning Organization following input of the Regional Targets Advisory Committee and a public stakeholders' consultation process per Senate Bill 375.

[2]Percentages are relative to the capped sector subtotal of 146.7 $MMTCO_2E$, and may not total 100 due to rounding.

[3]The total reduction for the recommended measures slightly exceeds the 169 MMTCO2E of reductions estimated in the BAU 2020 Emissions Forecast. This is the net effect of adding several measures and adjusting the emissions reduction estimates for some other measures.

California Energy Code

The CCR, Title 24, Part 6 is the California Energy Code. This code, originally enacted in 1978 in response to legislative mandates, establishes energy-efficiency standards for residential and non-residential buildings in order to reduce California's energy consumption. The Energy Code is updated periodically to incorporate and consider new energy-efficiency technologies and methodologies as they become available. The most recent amendments to the Energy Code, known as 2013 Title 24, or the 2013 Energy Code, become effective January 1, 2014. The 2008 Title 24 required an energy savings of 15–35 percent above the former 2005 Title 24 Energy Code. The 2013 Energy Code is anticipated to result in similar energy savings over the 2008 Title 24 standards. At a minimum, residential buildings must achieve a 15 percent reduction in their combined space heating, cooling, and water heating energy compared to the 2005 Title 24 standards. The reference to 2005 Title 24 is relevant in that many of the state's long-term energy and GHG reduction goals identify energy-saving targets relative to 2005 Title 24.

New construction and major renovations must demonstrate their compliance with the current Energy Code through submission and approval of a Title 24 Compliance Report to the local building permit review authority and the California Energy Commission (CEC). The compliance reports must demonstrate a building's energy performance through use of CEC-approved energy performance software that shows iterative increases in energy efficiency given selection of various heating, ventilation, and air conditioning; sealing; window glazing; insulation; and other components related to the building envelope. Title 24 governs energy consumed by the major building envelope systems such as space heating, space cooling, water heating, some aspects of the fixed lighting system, and ventilation. Non-building energy use, or "plug-in" energy use (such as appliances, equipment, electronics, plug-in lighting), are independent of building design and are not subject to Title 24.

California Green Building Standards

In 2007, the California Building Standards Commission was directed to work with state agencies on the adoption of green building standards for residential, commercial, and public building construction for the 2010 code adoption process. A voluntary version of the California Green Building Standards Code, referred to as CALGreen, was added to Title 24 as Part 11 in 2009. The 2010 version of CALGreen took effect January 1, 2011, and instituted mandatory minimum environmental performance standards for all ground-up new construction of commercial and low-rise residential buildings, state-owned buildings, schools, and hospitals. It also includes voluntary tiers (I and II) with stricter environmental performance standards for these same categories of residential and non-residential buildings. Local jurisdictions must enforce the minimum mandatory requirements and may adopt the Green Building Standards with amendments for stricter requirements.

The mandatory standards require:

- 20 percent mandatory reduction in indoor water use relative to specified baseline levels;
- 50 percent construction/demolition waste diverted from landfills;
- mandatory inspections of energy systems to ensure optimal working efficiency; and
- requirements for low-pollutant emitting exterior and interior finish materials such as paints, carpets, vinyl flooring, and particleboards.

The voluntary standards require:

- Tier I—15 percent improvement in energy requirements, stricter water conservation requirements for specific fixtures, 65 percent reduction in construction waste, 10 percent recycled content, 20 percent permeable paving, 20 percent cement reduction, cool/solar reflective roof; and
- Tier II—30 percent improvement in energy requirements, stricter water conservation requirements for specific fixtures, 75 percent reduction in construction waste, 15 percent recycled content, 30 percent permeable paving, 30 percent cement reduction, cool/solar reflective roof.

Similar to the compliance reporting procedure described above for demonstrating energy code compliance in new buildings and major renovations, compliance with the CALGreen water reduction requirements must be demonstrated through completion of water use reporting forms for new low-rise residential and non-residential buildings. The water use compliance form must demonstrate a 20 percent reduction in indoor water use by either showing a 20 percent reduction in the overall baseline water use as identified in CALGreen or a reduced per-plumbing-fixture water use rate.

The CARB Scoping Plan includes a Green Building Strategy with the goal of expanding the use of green building practices to reduce the carbon footprint of new and existing buildings. Consistent with CALGreen, the Scoping Plan recognized that GHG reductions would be achieved through buildings that exceed minimum energy-efficiency standards, decrease consumption of potable water, reduce solid waste during construction and operation, and incorporate sustainable materials. Green building is thus a vehicle to achieve the Scoping Plan's statewide electricity and natural gas efficiency targets, and lower GHG emissions from waste and water transport sectors.

In the Scoping Plan, CARB projects that an additional 26.3 $MMTCO_2E$ could be reduced through expanded green building (CARB 2008). However, this reduction is not counted toward the BAU 2020 reduction goal to avoid any double counting, as most of these reductions are accounted for in the electricity, waste, and water sectors. Because of this, CARB has assigned all emissions reductions that occur because of green building strategies to other sectors for

meeting AB 32 requirements, but will continue to evaluate and refine the emissions from this sector.

Renewables Portfolio Standard

The RPS promotes diversification of the state's electricity supply. Originally adopted in 2002 with a goal to achieve a 20 percent renewable energy mix by 2020, the goal has been accelerated and increased, most recently so by EOs S-14-08 and S-21-09, to a goal of 33 percent by 2020. Its purpose is to achieve a 33 percent renewable energy mix statewide, providing 33 percent of the state's electricity needs met by renewable resources by 2020 (CARB 2008c). The RPS is included in CARB's Scoping Plan list of reduction measures (see Table 4.10-1). Increasing the RPS to 33 percent is designed to accelerate the transformation of the electricity sector, including investment in the transmission infrastructure and systems changes to allow integration of large quantities of intermittent wind and solar generation. Renewable energy includes (but is not limited to) wind, solar, geothermal, small hydroelectric, biomass, anaerobic digestion, and landfill gas. Increased use of renewables would decrease California's reliance on fossil fuels, thus reducing emissions of GHGs from the electricity sector. In 2008, as part of the Scoping Plan original estimates, CARB estimated that full achievement of the RPS would decrease statewide GHG emissions by 21.3 $MMTCO_2E$ (CARB 2008). In 2010, CARB revised this number upwards to 24.0 $MMTCO_2E$ (CARB 2010a).

Assembly Bill 1493

AB 1493 (Pavley), enacted July 2002, directed CARB to adopt vehicle standards that lowered GHG emissions from passenger vehicles and light-duty trucks to the maximum extent technologically feasible, beginning with the 2009 model year.

With these actions, it is expected that Pavley I (27.7 $MMTCO_2E$) and Advanced Clean Cars (4 $MMTCO_2E$) will reduce GHG emissions from California passenger vehicles by a total of 31.7 $MMTCO_2E$ (or 22 percent – including 2.7 percent from Advanced Clean Cars) counted toward the total pre-economic downturn statewide reduction target on the capped sector of 146.7 $MMTCO_2E$ (CARB 2012) (see Table 4.10-1). However, the revised 2010 projections (post-economic downturn) estimate that Pavley I (26.1 $MMTCO_2E$) and the Advanced Clean Cars (3.8 $MMTCO_2E$) will reduce GHG emissions from passenger vehicles by a total of 29.9 $MMTCO_2E$, 37 percent of the total 80 $MMTCO_2E$ reduction target.

CARB has also adopted a second phase of the Pavley regulations, termed "Pavley II", now called the Low Emission Vehicle III" (LEV III) Standards, that cover model years 2017 to 2025. CARB estimates that LEV III will reduce vehicle GHGs by an additional 2.4 percent (CARB 2010b). These reductions are to come from improved vehicle technologies such as small engines with superchargers, continuously variable transmissions, and hybrid electric drives. CARB is currently working on the 2013 update to the AB 32 Scoping Plan, with a draft report scheduled for the summer of 2013. It is expected that this report will contain updates on additional projections to account for LEV III (CARB 2013).

Low Carbon Fuel Standard

Another key vehicle emission reduction measure identified in the CARB Scoping Plan is the LCFS. This EO, signed in January 2007, directed that a statewide goal be established to reduce the carbon intensity of California's transportation fuels by at least 10 percent by 2020 LCFS. CARB adopted the LCFS as a discrete early action measure pursuant to AB 32 in April 2009, and includes it as a reduction measure in its Scoping Plan (see Table 4.10-1).

The LCFS is a performance standard with flexible compliance mechanisms intended to incentivize the development of a diverse set of clean, low-carbon transportation fuel options. Its aim is to accelerate the availability and diversity of low-carbon fuels such as biofuels, electricity, and hydrogen by taking into consideration the full life cycle of GHG emissions. A 10 percent reduction in the intensity of transportation fuels is expected to equate to a reduction of 16.5 $MMTCO_2E$ in 2020 (based on the original 2008 Scoping Plan estimates). However, in order to account for possible overlap of benefits between LCFS and the Pavley GHG standards, CARB has discounted the contribution of LCFS to 15 $MMTCO_2E$ (CARB 2008).

Tire Pressure Program

CARB's Tire Pressure Regulation took effect in September 2010. The purpose of this regulation is to reduce GHG emissions from vehicles operating with inflated tires by inflating them to the recommended tire pressure rating. Automotive service providers, among other requirements, must check and inflate each vehicle's tires to the recommended tire pressure rating at the time of performing any automotive maintenance or repair service; indicate on the vehicle service invoice that a tire inflation service was completed and the tire pressure measurements after the service were performed; and keep a copy of the service invoice for a minimum of three years, and make the vehicle service invoice available to the CARB or its authorized representative upon request.

c. City of San Diego

City of San Diego General Plan

The General Plan includes several climate change-related policies aimed at reducing GHG emissions from future development and City operations. For example, Conservation Element policy CE-A.2 aims to "reduce the City's carbon footprint" and to "develop and adopt new or amended regulations, programs, and incentives as appropriate to implement the goals and policies set forth" related to climate change. The Land Use and Community Planning Element, the Mobility Element, the Urban Design Element, and the Public Facilities, Services, and Safety Element also identify GHG reduction and climate change adaptation goals. These elements contain policy language related to sustainable land use patterns, alternative modes of transportation, energy efficiency, water conservation, waste reduction, and greater landfill efficiency. The overall intent of these policies is to support climate protection actions while retaining flexibility in the design of implementation measures, which could be influenced by new

scientific research, technological advances, environmental conditions, or state and federal legislation.

Cumulative impacts of GHG emissions were qualitatively analyzed and determined to be significant and unavoidable in the 2008 Program EIR for the General Plan. A Program EIR Report Mitigation Framework was included that indicated "for each future project requiring mitigation (measures that go beyond what is required by existing programs, plans, and regulations), project-specific measures will [need to] be identified with the goal of reducing incremental project-level impacts to less than significant; or the incremental contributions of a project may remain significant and unavoidable where no feasible mitigation exists."

Climate Mitigation and Adaptation Plan

A citywide Climate Mitigation and Adaptation Plan (CMAP) has been developed to provide a mechanism for the City to achieve the goals of AB 32 and the CARB Scoping Plan at a program level. The CMAP elements were prepared pursuant to guidance from the amended CEQA Guidelines and CARB recommendations for what constitutes an effective GHG reduction plan.

Once adopted, discretionary and ministerial projects within the City's jurisdiction would be evaluated through an Initial Study or similar review to determine conformance with the measures identified in the CMAP. The plan is not final, and it would be premature to analyze the project's consistency with this draft plan.

Climate Action Strategy

The SANDAG Climate Action Strategy was published in March 2010 and consists of potential options to address climate change for consideration in the RTP and RCP updates.

As indicated above, per the requirements of Senate Bill (SB) 375, the San Diego region will be required to reduce GHG emissions from cars and light trucks 7 percent per capita by 2020 and 13 percent by 2035 (SANDAG 2011). These reduction targets have been incorporated into the 2050 RTP, although current legislation is still pending over the SANDAG produced SCS.

4.10.1.2 State and Regional GHG Inventories

The CARB performs statewide GHG inventories. The inventory is divided into nine broad sectors of economic activity: agriculture, commercial, electricity generation, forestry, high global warming potentials (GWP) emitters, industrial, recycling and waste, residential, and transportation. Emissions are quantified in $MMTCO_2E$. Table 4.10-2 shows the estimated statewide GHG emissions for the years 1990, 2000, 2004, and 2008.

TABLE 4.10-2
CALIFORNIA GHG EMISSIONS BY SECTOR IN 1990, 2000, 2004, AND 2008

Sector	1990 Emissions in $MMTCO_2E$ (% total)[1]	2000 Emissions in $MMTCO_2E$ (% total)[1]	2004 Emissions in $MMTCO_2E$ (% total)[1]	2008 Emissions in $MMTCO_2E$ (% total)[1]
Sources				
Agriculture	23.4 (5%)	25.44 (6%)	28.82 (6%)	28.06 (6%)
Commercial	14.4 (3%)	12.80 (3%)	13.20 (3%)	14.68 (3%)
Electricity Generation	110.6 (26%)	103.92 (23%)	119.96 (25%)	116.35 (24%)
Forestry (excluding sinks)	0.2 (<1%)	0.19 (<1%)	0.19 (<1%)	0.19 (<1%)
High GWP	--	10.95 (2%)	13.57 (3%)	15.65 (3%)
Industrial	103.0 (24%)	97.27 (21%)	90.87 (19%)	92.66 (19%)
Recycling and Waste	--	6.20 (1%)	6.23 (1%)	6.71 (1%)
Residential	29.7 (7%)	30.13 (7%)	29.34 (6%)	28.45 (6%)
Transportation	150.7 (35%)	171.13 (37%)	181.71 (38%)	174.69 (37%)
Unspecified Remaining[2]	1.3 (<1%)	--	--	--
Subtotal	*433.3*	*458.03*	*483.89*	*477.74*
Sinks				
Forestry Sinks	-6.7 (--)	-4.72 (--)	-4.32 (--)	-3.98 (--)
TOTAL	**426.6**	**453.31**	**479.57**	**473.76**

SOURCE: CARB 2007, 2010c.
[1] Percentages may not total 100 due to rounding.
[2] Unspecified fuel combustion and ozone depleting substance (ODS) substitute use, which could not be attributed to an individual sector.

As shown in Table 4.10-2, statewide GHG emissions totaled 433 $MMTCO_2E$ in 1990, 458 $MMTCO_2E$ in 2000, 484 $MMTCO_2E$ in 2004, and 478 $MMTCO_2E$ in 2008. According to data from the CARB, it appears that statewide GHG emissions peaked in 2004, and are now beginning to decrease (CARB 2010c). Transportation-related emissions consistently contribute the most GHG emissions, followed by electricity generation and industrial emissions.

The forestry sector is unique because it not only includes emissions associated with harvest, fire, and land use conversion (sources), but also includes removals of atmospheric CO_2 (sinks) by photosynthesis, which is then bound (sequestered) in plant tissues. As seen in Table 4.10-2, the forestry sector consistently removes more CO_2 from the atmosphere statewide than it emits. As a result, although decreasing over time, this sector represents a net sink, removing a net 6.5 $MMTCO_2E$ from the atmosphere in 1990, a net 4.5 $MMTCO_2E$ in 2000, a net 4.1 $MMTCO_2E$ in 2004, and a net 3.8 $MMTCO_2E$ in 2008.

A San Diego regional emissions inventory was prepared by the University of San Diego School of Law, Energy Policy Initiative Center, which took into account the unique characteristics of the region. Their 2006 emissions inventory for San Diego is duplicated below in Table 4.10-3. The sectors included in this inventory are somewhat different from those in the statewide inventory.

TABLE 4.10-3
SAN DIEGO COUNTY GHG EMISSIONS BY SECTOR IN 2006

Sector	2006 Emissions in $MMTCO_2E$ (% total)[1]	
Agriculture/Forestry/Land Use	0.7	(2%)
Waste	0.7	(2%)
Electricity	9.0	(25%)
Natural Gas Consumption	3.0	(8%)
Industrial Processes & Products	1.6	(5%)
On-Road Transportation	16.0	(45%)
Off-Road Equipment & Vehicles	1.3	(4%)
Civil Aviation	1.7	(5%)
Rail	0.3	(<1%)
Water-Borne Navigation	0.127	(<0.5%)
Other Fuels/Other	1.1	(3%)
TOTAL	**35.5**	

SOURCE: University of San Diego 2008
[1] Percentages may not total 100 due to rounding.

Similar to the statewide emissions, transportation-related GHG emissions contributed the most countywide, followed by emissions associated with energy use.

4.10.1.3 Existing GHG Emissions

A majority of the project site is undeveloped open space with a baseball field. As such, the project site is not currently a measurable source of GHG emissions.

4.10.1.4 Implications of Climate Change

The increase in the earth's temperature is expected to have wide ranging effects on the environment. Although global climate change is anticipated to affect all areas of the globe, there are numerous implications of direct importance to California. Statewide average temperatures are anticipated to increase by between 3 and 10.5 degrees Fahrenheit (°F) by 2100. Some climate models indicate that this warming may be greater in the summer than in the winter. This could result in widespread adverse impacts to ecosystem health, agricultural production, water use and supply, and energy demand. Increased temperatures could reduce the Sierra Nevada snowpack and put additional strain on the region's water supply. In addition, increased temperatures could result in lower inversion levels leading to a decrease in air quality. It is important to note that even if GHG emissions were to be eliminated or dramatically reduced, it is projected that the effect of those emissions would continue to affect global climate for centuries.

Water supply could also be negatively impacted by global climate change and associated challenges, including, but not limited to: reduction in the average annual snow pack; changes in the timing, intensity, location, and amount and variability in precipitation; long-term changes in watershed vegetation and increased incidence of wildfires; rise in sea level; increased water

temperatures; and changes in urban and agricultural water demand (California Climate Change Center 2006).

While the impacts of global climate change on the water supply cannot be meaningfully quantified at this time, the Metropolitan Water District of Southern California (MWD) has taken actions to decrease potential impacts of climate change on the reliability of its water supplies, which are reflected in its regional water supply plans. In addition to policies emphasizing diversification and adaptability of supply sources to manage uncertainties, current MWD water supply planning stresses the importance of local water supplies such as conservation, water reclamation, and groundwater recharge, which would be less affected by global climate change. The MWD has also entered into agreements to store water in groundwater reservoirs within and outside southern California.

4.10.2 Significance Determination Thresholds

The City has not adopted its own GHG Thresholds of Significance for CEQA and is following guidance from the 2008 California Air Pollution Control Officers Association report "CEQA & Climate Change" to identify screening criteria to determine when a GHG analysis would be required, and information from the CARB Scoping Plan and BAU 2020 Forecast to determine when a cumulatively significant contribution of GHGs has occurred.

The California Air Pollution Control Officers Association report references a 900-metric-ton guideline as a conservative threshold for requiring further analysis and mitigation. The City, thus, chose a 900-metric-ton screening criterion for determining when a GHG analysis would be required.

For projects that exceed 900 metric tons of GHGs annually, the City requires a GHG emissions analysis to demonstrate that the proposed project design achieves a 28.3 percent reduction relative to BAU GHG emissions (City of San Diego 2010). This requirement is based on the CARB BAU 2020 Forecast and Scoping Plan, which identifies the reductions needed to achieve an approximate overall 28.3 percent reduction in statewide BAU emissions by 2020.

If the project's 2020 GHG emissions with incorporation of GHG-reducing regulations and design features represent a 28.3 percent reduction relative to the project's BAU GHG emissions, the project would not result in a significant impact to global climate change.

4.10.3 Issue 1: GHG Emissions

Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?

4.10.3.1 Impacts

GHG emissions were estimated using the CalEEMod computer program. Emission estimates were calculated for the three GHGs of primary concern (CO_2, CH_4, and N_2O) that would be

emitted from construction and the five primary operational sources that would be associated with project buildout: on-road vehicular traffic, use of consumer products, energy use (composed of electricity use and natural gas consumption), water use, and solid waste disposal.

a. Construction

Construction activities emit GHGs primarily through the combustion of fuels (mostly diesel) in the engines of off-road construction equipment, through combustion of diesel and gasoline in on-road construction vehicles, and in the commute vehicles of the construction workers. Smaller amounts of GHGs are also emitted through the energy use embodied in any water use (for fugitive dust control) and lighting for the construction activity. Every phase of the construction process, including demolition, grading, paving, and building, emits GHGs, in volumes proportional to the quantity and type of construction equipment used. The heavier equipment typically emits more GHGs per hour of use than the lighter equipment because of their greater fuel consumption and engine design.

All CalEEMod defaults for construction activities were used, and it was projected that construction would occur from 2014 to 2016. It was estimated that construction activities would generate a total of 1,400 $MTCO_2E$. While CalEEMod distributes construction activity emissions over each year at varying quantities depending on various model assumptions, for the purpose of this analysis, total construction GHG emissions were divided by 30 years in order to identify annual construction GHG emissions. This is in accordance with Association of Environmental Professionals (AEP) recommendations (AEP 2010). Thus, annual construction GHG emissions associated with construction of the project would be approximately 47 $MTCO_2E$ each year.

b. Operation

Vehicles

GHG emissions would be emitted from vehicles associated with the project and would come from the combustion of fossil fuels (primarily gasoline and diesel) in vehicle engines. Based on the trip generation rates contained in the traffic report and a trip length of 5.8 miles, CalEEMod calculates that the project would generate approximately 3,490,298 VMT per year. Based on this traffic volume, an estimated total of 1,792 $MTCO_2E$ of GHGs would be emitted annually by vehicles associated with buildout of the BAU project.

For the project (non-BAU), vehicle emissions estimates for 2020 are adjusted to account for Pavley I and LCFS. In addition, reductions would occur from implementation of LEV III and the Tire Pressure Program. LEV III was estimated to reduce emissions by 2.4 percent of the estimated 174 $MMTCO_2E$ reduction total. The Tire Pressure Program was estimated to reduce GHG emissions by an additional 0.6 percent. These reductions were taken into account for estimation of project emissions in year 2020 with GHG-reduction measures.

The project provides extensive bus, van, and car services. A 28-passenger bus and a 24-passenger bus are proposed for the project, along with one van and two cars. The trip generation rates provided in the traffic report do not take these services into account. Based on the number of residents and the number of seats provided in the buses, van, and cars, it was estimated that the transportation services would reduce trips by 10 percent. Based on the trip generation rates contained in the traffic report and a trip length of 5.8 miles, CalEEMod calculates that the project would generate approximately 3,268,140 VMT per year prior to the 10 percent trip rate reduction. After taking into account a 10 percent trip reduction and adjusting for LEV III and the Tire Pressure Program, a total of 1,253 $MTCO_2E$ of GHGs would be emitted annually by vehicles associated with the project. This represents a 30.1 percent reduction in BAU emissions.

Energy

GHG emissions would be generated by the use of electricity and combustion of natural gas. Assuming default historical consumption rates, the BAU project is estimated to consume 3,309,045 kWh of electricity per year and 5,794,968 thousand British thermal units (kBtu) of natural gas per year. This results in total annual GHG emissions of approximately 1,396 $MTCO_2E$.

The project (non-BAU) would be constructed in accordance with the 2013 Title 24 energy code, which is estimated to be 25 percent more energy efficient than the previous 2008 Title 24 energy code (Imperial Valley Economic Development Corporation 2013). The project would also increase lighting efficiency by 25 percent. Additionally, as shown in Table 4.10-1, implementation of the RPS would reduce GHG emissions by 14 percent. This reduction was also taken into account. With these assumptions, it was estimated that the total annual energy consumption associated with buildout of the project would emit 1,021 $MTCO_2E$ of GHGs annually. This represents a 26.9 percent reduction in BAU emissions.

Area Sources

Area sources of GHG emissions include hearths, woodstoves, and landscaping equipment. In this GHG analysis, no hearths or woodstoves were attributed to the project. Due to the limited outdoor landscaping, CalEEMod estimates that area sources would not result in the emission of measureable GHGs from landscaping activities.

Assuming all CalEEMod defaults, it is estimated that area sources would result in approximately 6 $MTCO_2E$ annually for a BAU project. Area source emissions for the project (non-BAU) were assumed to be the same as those for the BAU project.

Water

The supply and treatment of water to the project site would consume large amounts of energy. This type of energy use is known as embodied energy. GHGs would be emitted from the

generation of this embodied energy. Based on the CalEEMod default BAU water use rates and embodied energy intensities, CalEEMod estimates that the embodied energy needed to supply and treat future water for the project site would emit 309 $MTCO_2E$ of GHGs each year.

The project would reduce water consumption by 30 percent. This is a 10 percent increase over CALGreen requirements. For the project (non-BAU), CalEEMod estimates that the embodied energy needed to supply and treat future water use on the project site would emit 216 $MTCO_2E$ of GHGs each year. This quantity is 30 percent less than the amount that would be emitted under BAU.

Solid Waste

The disposal of solid waste produces GHG emissions from anaerobic decomposition in landfills, incineration, and transportation of waste. It was estimated that that the BAU project would generate 417 $MTCO_2E$ of GHGs per year associated with solid waste disposal.

For calculating the project's GHG emissions related to solid waste disposal, it was projected that with implementation of the approved WMP, the project with GHG-reducing features would reduce waste by 30 percent. CalEEMod estimates that the disposal of solid waste associated with the project would generate approximately 292 $MTCO_2E$ of GHGs per year.

c. Total Emissions

Table 4.10-4 summarizes the BAU emissions in 2020 and the project emissions with GHG reductions in 2020. Table 4.10-4 also provides the percentage reductions for comparison with the City's 28.3 percent reduction relative to BAU goal.

TABLE 4.10-4
PROJECT AND BAU GHG EMISSIONS IN 2020
($MTCO_2E$ PER YEAR)

Emission Source	BAU Emissions	Project Emissions with State and Project-Design GHG Reduction Measures	Percent Reduction
Vehicles	1,792	1,253	30.1
Energy Use	1,396	1,021	26.9
Area Sources	6	6	0.0
Water Use	309	216	30.0
Solid Waste Disposal	417	292	30.0
Construction	57	57	0.0
TOTAL	**3,976**	**2,844**	**28.5**

4.10.3.2 Significance of Impacts

BAU emissions, or project emissions without GHG reductions, would total 3,976 $MTCO_2E$ annually. Project emissions with state and project-design GHG reductions would total 2,844

$MTCO_2E$ per year. This is approximately a 28.5 percent reduction, and this would meet the City's reduction goal of 28.3 percent. Therefore, impacts would be less than significant.

The following GHG-reducing project design features were taken into account and would be a condition of project approval:

- Implement shuttle, van, and car service.
- Install high efficiency lighting to reduce lighting energy consumption by 25 percent.
- Reduce water consumption by 30 percent.
- Institute recycling and composting services to reduce the amount of waste disposed of by 30 percent.

4.10.3.3 Mitigation, Monitoring, Reporting

Impacts would be less than significant. No mitigation is required.

4.10.4 Issue 2: Consistency with Plans, Policies, and Regulations

Would the project conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHG?

4.10.4.1 Impacts

The regulatory plans and policies discussed extensively in Section 4.10.1.1 above aim to reduce national, state, and local GHG emissions by primarily targeting the largest emitters of GHGs: the transportation and energy sectors. Plan goals and regulatory standards are thus largely focused on the automobile industry and public utilities. For the transportation sector, the reduction strategy is generally three pronged: to reduce GHG emissions from vehicles by improving engine design; to reduce the carbon content of transportation fuels through research, funding, and incentives to fuel suppliers; and to reduce the miles vehicles travel through land use change and infrastructure investments.

For the energy sector, the reduction strategies aim to reduce energy demand; impose emission caps on energy providers; establish minimum building energy and green building standards; transition to renewable non-fossil fuels; incentivize homeowners and builders; fully recover landfill gas for energy; expand research and development; and so forth.

As discussed above, the project would be constructed in accordance with 2013 Title 24 and CALGreen and would achieve GHG reductions through green building design that includes improved energy efficiency and water conservation. The project would exceed the City's 28.3

percent reduction goal, and would meet its fair share in achieving the state's reduction target, thereby not conflicting with the Scoping Plan.

4.10.4.2 Significance of Impacts

The project is consistent with the goals and strategies of local and state plans, policies, and regulations aimed at reducing GHG emissions from land use and development. Impacts would be less than significant.

4.10.4.3 Mitigation, Monitoring, Reporting

Impacts would be less than significant. No mitigation is required.

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4.11 Public Services

Public services are those functions that serve residents on a communitywide basis. These functions include fire protection and emergency medical services, police protection, public recreational facilities and parks, and libraries, and are discussed below. The following provides a discussion of these services and facilities as they relate to the project. Because the project would not generate any school-aged children, the discussion of school facilities is discussed in Section 8, Effects Found Not to be Significant. This section is based on letters prepared by the service providers, which are included in Appendix B of this EIR.

4.11.1 Existing Conditions

4.11.1.1 Fire Protection/Emergency Medical Services

Fire protection services to the project area are provided by the City Fire-Rescue Department (SDFD). The General Plan (City of San Diego 2008) states that fire stations should be sited on lots that are at least three-quarters of an acre with room for expansion within two to two and a half miles apart and be staffed and equipped to respond to calls within their established standards. The SDFD's goal is one firefighter per 1,000 citizens. To ensure adequate fire protection response to fire calls, the SDFD adheres to national standards which require that an initial response of fire suppression resources (i.e., a four-person engine company) react within five minutes, and that an effective fire force (i.e., 15 firefighters), react within nine minutes of a call.

Fire Station 44 is the closest fire station to the project site, and serves Eastern Mira Mesa and surrounding areas. Fire Station 44, located approximately two miles from the project site at 10011 Black Mountain Road, houses a battalion chief (Battalion 7), one engine company (Engine 44), one truck (Truck 44), and two hazardous material (HAZMAT) rigs (HAZMAT 1 and 2).

The next closest fire station is Fire Station 37, located approximately four miles from the project site at 11640 Spring Canyon Road. Fire Station 37 houses one engine company (Engine 37), a brush rig (Brush 37), and a paramedic unit (Paramedic 37).

All fire department engines and trucks are full Advanced Life Support units and are equipped and capable of managing medical emergencies.

Response time estimates for the project were calculated using the SDFD 911 Computer Aided Dispatch System's point to point routing. This program uses the road network generating the closest path from the fire station to the requested location. Response times are summarized in Table 4.11-1. Response times include dispatch and turnout time.

TABLE 4.11-1
FIRE RESPONSE TIMES
(minutes)

Unit	Fire Station	Response Time (minutes)
Engines		
E44	Fire Station 44	5.3
E37	Fire Station 37	7.0
E38	Fire Station 38	8.9
E40	Fire Station 40	10.7
Trucks		
T44	Fire Station 44	5.3
T40	Fire Station 40	10.7
Battalion Chiefs		
B7	Fire Station 44	5.3
B5	Fire Station 35	14.9

SOURCE: Personal communication, Laura Brenner-Mikoly, SDFD Communication's Response Planning.

Emergency medical services are provided to the project area and throughout the City through a public/private partnership between the City's Emergency Medical Services (EMS) and the Rural Metro Corporation, which provides some personnel and some ambulances.

EMS has ambulances, paramedics, and emergency medical technicians (EMTs) who respond to emergency calls. Fire Station 37 houses paramedic units. There are four levels of calls. Level 1 is the most serious (e.g., heart attack, shortness of breath), and the closest fire engine and an advance life support ambulance respond to this type of call. A fire crew has to respond within eight minutes of being dispatched pursuant to City contract requirements, and an ambulance has to respond within 12 minutes. A Level 2 call is the next most serious; however, these calls are either reprioritized up to a Level 1 call or down to a Level 3 call. Only the advance life support ambulance responds to Level 2 calls; no fire station staff or equipment are deployed. The response time for a Level 2 call is 12 minutes, the same as for a Level 1 call. For a Level 3 call (e.g., someone having extended flu-like symptoms), either a basic or advance life support ambulance would respond. A basic ambulance is staffed with two EMTs, whereas an advance life support ambulance is staffed with one paramedic and one EMT. The response time for a Level 3 call is 18 minutes. For a Level 4 call, which is not an emergency (e.g., the patient could have driven themselves to a hospital), a basic ambulance would respond within 18 minutes of being dispatched. EMS is under contract to meet the 12- or 18-minute response times at least 90 percent of the time.

4.11.1.2 Police Protection

Police services are provided by the San Diego Police Department (SDPD). The SDPD currently uses a five-level priority dispatch system, which includes, in descending order: priority E (Emergency), One, Two, Three, and Four. The calls are prioritized by the phone dispatcher and routed to the radio operator for dispatch to the field units. The priority system is designed as a

guide, allowing the phone dispatcher and the radio dispatcher discretion to raise or lower the priority as necessary based on information received. Priority E and Priority One calls involve serious crimes in progress or those with a potential for injury. Priority Two calls include vandalism, disturbances, and property crimes. Priority Three includes calls after a crime has been committed, such as cold burglaries and loud music. Priority Four calls include parking complaints or lost and found reports.

The SDPD's goal response times are 7 minutes for emergency calls, 12 minutes for priority one calls, 30 minutes for priority two calls, and 90 minutes for priority three and four calls.

The project site is located within the boundaries of police Beat 241 of SDPD, Northeastern Division Substation. The Northeastern Division Substation is located approximately six miles north of the project site at 13396 Salmon River Road in the Rancho Peñasquitos community. The Northeastern Division serves the neighborhoods of San Pasqual, Carmel Mountain, Carmel Valley, Miramar, Miramar Ranch North, Mira Mesa, Rancho Bernardo, Black Mountain Ranch, Torrey Highlands, Rancho Encantada, Rancho Peñasquitos, Sabre Springs, and Scripps Ranch. The SDPD has mutual aid agreements with all other law enforcement agencies in San Diego County.

Additional police services for the project area are provided by the Police Community Relations Office (also called the Mira Mesa/Scripps Ranch Storefront), located at 8450 #A Mira Mesa Blvd, approximately four miles west of the project area. This facility is a community outreach facility that houses one police officer and one community service officer to provide crime prevention education and information services. Officers are not dispatched on radio call from this location.

The Northeast Division is currently staffed with 75 sworn personnel and one civilian employee. The current patrol strength at Northeastern Division is 66 uniformed patrol officers. Officers work 10-hour shifts. Staffing is composed of three shifts, which operate from 6:00 A.M. to 4:00 P.M. (First Watch), 2:00 P.M. to 12:00 A.M. (Second Watch), and 9:00 P.M. to 7:00 A.M. (Third Watch). Using the SDPD's recommended staffing guidelines, the Northeastern Division currently deploys a minimum of 9 patrol officers on First Watch, 11 patrol officers on Second Watch, and 7 patrol officers on Third Watch. The SDPD does not staff individual stations based on ratios of sworn officers per 1,000 population ratio. The goal citywide is to maintain 1.48 officers per 1,000 population ratio.

Table 4.11-2 below shows the citywide averages and SDPD goal response times.

TABLE 4.11-2
POLICE RESPONSE TIMES
(minutes)

Call Types	Beat 241 Average Response Times (Calendar Year 2011)	Citywide Average Response Times (Calendar Year 2011)	SDPD Goal Response Times
Emergency	8.6	6.6	7
Priority One	15.5	12.1	14
Priority Two	24.5	25.2	27
Priority Three	60.5	67.4	70
Priority Four	81.4	66.7	70

SOURCE: City of San Diego Police Department, Operational Support Division, personal communication with Lieutenant Dawn M. Summers. August 6, 2013.

The SDPD strives to maintain the response time goals as one of various other measures used to assess the level of service to the community. The SDPD is currently reaching its targeted staffing ratio of 1.48 sworn officers per 1,000 residents based on a 2011 estimate residential population of 1,311,882. The ratio is calculated to take into account all support and investigative positions within the department. This ratio does not include the significant population increase resulting from citizens who commute to work from outside the city of San Diego or those visiting.

There are no current plans for additional police substations in the immediate project area. Police response times in the project area will continue to increase with the buildout of community plans and the increase of traffic generated by new growth.

4.11.1.3 Parks/Recreational Facilities

The City of San Diego has over 38,930 acres of park and open space lands that offer a diverse range of recreation opportunities. The City provides three use categories of parks for residents and visitors: population-based parks, resource-based parks, and open space lands, as described below:

- Population-based parks (commonly known as neighborhood and community parks), facilities, and services are located in close proximity to residential development and are intended to serve the daily needs of the neighborhood and community.

- Resource-based parks are located at, or centered on, notable natural or man-made features and are intended to serve the citywide population, as well as visitors.

- Open space lands are City-owned lands located throughout the City, consisting of canyons, mesas, and other natural landforms. This open space is intended to preserve and protect native habitats, while still providing public access.

The General Plan's (City of San Diego 2008) park standard is to provide 2.8 acres of population-based park land per 1,000 residents. While the City's primary goal is to obtain land

for park and recreation facilities, alternative methods of providing recreation facilities can be obtained through Park Equivalencies. These types of parks include, but are not limited to, joint use facilities, privately owned parks or non-traditional park sites with recreation easements for public use.

The SMRCP area has six neighborhood parks (Cypress Canyon, Jerabek, Lakeview, Aviary, Forestview, and Semillion), one community park (Scripps Ranch), three joint use facilities (Jerabek Elementary, Marshal Middle School, and Scripps Ranch High School), and an open space (Carroll Canyon).

4.11.1.4 Libraries

The project site is located in the service area of the City Library System. The City operates a central library located in downtown San Diego and 35 branch libraries in neighborhoods throughout the City. The closest libraries to the project area are the Scripps Miramar Ranch Library located at 10301 Scripps Lake Drive, the Mira Mesa Library located at 8405 New Salem Street, and the Rancho Peñasquitos Library located at 13330 Salmon River Road.

The Scripps Miramar Ranch Library is located approximately 1.5 miles from the project area. This library branch provides library and community services in its 21,700 square-foot facility, and is open 44 hours per week.

4.11.1.5 School Facilities

The project site is located within the San Diego Unified School District, which serves over 132,000 students ranging from pre-school through grade 12 in 226 educational facilities. Jerabek Elementary School and Marshall Middle School are the closest San Diego Unified District schools to the project site. Alliant International University is the closest higher education facility to the project site.

4.11.2 Significance Determination Thresholds

Based on the City's 2011 Significance Determination Thresholds, impacts related to public services would be significant if the project would:

1. Have an effect upon, or result in a need for new or altered government services in any of the following areas: fire/life safety protection and emergency medical services; police protection; parks or other recreational facilities; libraries; and schools which would result in physical impacts.

4.11.3 Issue 1: Public Services

Would the project result in physical impacts from the construction or alteration of government facilities needed to maintain acceptable service ratios, response times, or other performance

objectives for public services in any of the following areas: fire protection and emergency medical services; police protection; parks or other recreational facilities; and libraries?

4.11.3.1 Impacts

a. Fire Protection/Emergency Medical Services

The SDFD would provide first responder and first responder paramedic services to the project. As discussed previously, Fire Station 44, located approximately two miles from the project site at 10011 Black Mountain Road, is the closest fire station to the project site. The General Plan's Public Facilities, Services, and Safety Element includes response-time objectives for the fire department, including a 90 percent response time (i.e., average time that 90 percent of the responses achieve) of 5 minutes for the first responding engine company. As shown in Table 4.11-1, Fire Station 44, which includes an engine, truck, and Battalion Chief 7, has a current response time of 5 minutes 18 seconds, just exceeding the goal.

The project includes the construction of a health center that would be staffed with medical professionals 24 hours per day. Health center staff would have the ability to call 9-1-1 and medically assess residents to determine if the request is a medical emergency or a routine care assistance issue.

The project site is subject to risk of wildfire due to its location adjacent to natural open space to the south (MCAS Miramar). A brush management plan has been prepared for the project, and is discussed in Section 4.8, Health and Safety/Hazardous Materials. The project would meet design and construction design standards of the SDFD with respect to assuring adequate safety from fire hazards. Such provisions include adequate turn-around radii for fire trucks at all turn-around locations, key placement and installation of fire hydrants, and the installation of sprinkler systems in all residential buildings.

The SDFD has identified the need for an additional station in the City and in the SMRCP area. A site for a new fire station has not been identified at this time. The applicant would be required to pay Facilities Benefit Assessments (FBA) fees, which the City would use to fund community-wide public services and facilities. FBA fees generally provide funds for public facilities projects which service a designated area of benefit and are identified in the Public Facilities Financing Plan (PFFP). The FBA fees are based upon the cost of each public facility equitably distributed over a designated area of benefit in the community planning area. Fees are paid on the actual development when permits are issued. These contributions would ensure that the project would have a less than significant direct impact on fire protection services.

b. Police Protection

As discussed previously, the project site is located within the boundaries of police Beat 241 of SDPD, Northeastern Division Substation, located approximately six miles north of the project site at 13396 Salmon River Road in the Rancho Peñasquitos community. Additional police

services for the project area are provided by the Police Community Relations Office (also called the Mira Mesa/Scripps Ranch Storefront), located at 8450 #A Mira Mesa Boulevard, approximately four miles west of the project area.

As shown in Table 4.11-2, the response times for priority E and priority 1 calls in the project area do not meet response time goals by 1 minute 36 seconds for priority E calls and by 3 minutes 30 seconds for priority 1 calls. All other average response times meet General Plan guidelines.

Northeastern Division serves a population of 234,394 people and encompasses 103.8 square miles. The project would result in incremental demand for police service in Beat 241 with the addition of 625 residents. The addition of 625 residents represents a population increase of approximately 0.003 percent. The residents would be located adjacent to existing residential uses along Pomerado Road and close to I-15. At the present time, significant response-time deficiencies due to a lack of personnel or equipment can be helped only by continued, mandatory approval by the City Council of the affected department's budget proposal for operations within the affected area. The applicant would be required to pay FBA fees that would address capital costs of police services. Therefore, impacts to police services would be less than significant.

c. Parks/Recreational Facilities

The project would increase the community population by up to 625 residents. The General Plan's park standard is to provide 2.8 acres of population-based park land per 1,000 residents. Based on the City's General Plan standard, the SMRCP area park requirement is 57.52 acres. The SMRCP area has a current deficit of 14.63 usable acres of population-based parks. However, the project is not required to address current population-based park deficits. The project would not require population-based park acreage to be provided on site, and payment of the FBA fee would satisfy the population-based park requirement. Because the project would not result in the direct need for new park facilities, there would be no physical impact associated with the development. Payment of FBA fees would satisfy the additional 1.75 acres of usable parkland and facility needs created by the project.

Furthermore, the project would include a tennis court, bocce ball courts, croquet lawn, pool, rose garden, and other areas dedicated to outdoor use and recreation that are not included as part of the population-based park requirements. With payment of FBA fees, impacts to parks and recreational facilities would be less than significant.

d. Libraries

The project is located within the City public library system. The local branches are part of the City library system, which allows residents to use any branch or the main library. Therefore, the residents of the project would be expected to increase the use of the nearby Scripps Ranch

Library, located approximately 1.5 miles from the project area, as well as other library branches in the public library system.

The provision of adequate libraries is a facilities financing issue, and project applicants are required to pay FBA fees. With payment of the appropriate fee as required by the City, impacts to libraries would be less than significant.

e. School Facilities

Although the project includes new housing, the housing being proposed would not generate an increase in resident population requiring education facilities and services. Therefore, local schools would not be affected by implementation of the project.

4.11.3.2 Significance of Impacts

a. Fire Protection/Emergency Medical Services

As discussed previously, Fire Station 44, located approximately two miles from the project site at 10011 Black Mountain Road, is the closest fire station to the project site. This fire station is just exceeding response time goals. However, prior to the issuance of building permits, the applicant is required to pay FBA fees that would ensure that direct impacts to fire protection and emergency medical services would be less than significant.

Additionally, fire safety impacts would be less than significant because the project would implement a brush management program in accordance with San Diego standards designed to prevent the risk of loss, injury, or death from wildfires.

b. Police Protection

As discussed previously, impacts to police services would not be considered significant. The addition of 625 residents represents a population increase of approximately 0.003 percent. The residents would be located adjacent to existing residential uses along Pomerado Road and close to I-15. At the present time, significant response-time deficiencies due to a lack of personnel or equipment can be helped only by continued, mandatory approval by the City Council of the affected department's budget proposal for operations within the affected area. Prior to the issuance of building permits, the applicant is required to pay FBA fees that would address capital costs of police services. Therefore, impacts to police services would be less than significant.

c. Parks/Recreational Facilities

No new population-based park facilities would be required. The applicant would be required to pay FBA fees, and funds collected would be deposited in a special interest-bearing account and can only be used for identified facilities serving the community in which they are collected. Thus, there would be no significant impacts to population-based parks.

d. Libraries

The project would place additional residents within the community; however, the project would provide on-site library facilities for its residents. With payment of FBA fees, impacts to parks and recreational facilities would be less than significant.

e. School Facilities

Housing being proposed would not affect local school districts. No significant impacts to schools are anticipated as a result of the project.

4.11.3.3 Mitigation, Monitoring, and Reporting

a. Fire Protection/Emergency Medical Services

Impacts to fire protection services would be less than significant. No mitigation is required.

b. Police Protection

Impacts to police protection services would be less than significant. No mitigation is required.

c. Parks/Recreational Facilities

Impacts to population-based parks would be less than significant. No mitigation is required.

d. Libraries

Impacts to library facilities would be less than significant. No mitigation is required.

e. School Facilities

Impacts to schools would be less than significant. No mitigation is required.

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4.12 Utilities

The following section discusses the public utilities of water, wastewater, and solid waste, and is based on technical studies prepared for the project. Latitude 33 Planning & Engineering prepared a water study (Appendix L), sewer study (Appendix M), and waste management plan (WMP; Appendix N) for the project. The water study evaluates existing and planned potable water system capacity and distribution to the project. The sewer study evaluates existing and planned wastewater system capacity. The WMP evaluates the disposal of waste generated by the project. In addition, a water supply assessment and addendum were prepared by the City (Appendices O-1 and O-2) to discuss the regions ability to meet the project's water needs.

4.12.1 Existing Conditions

4.12.1.1 Water Supply and Water Systems

The PUD provides services to the project site with potable water. The PUD treats and delivers more than 200,000 acre-feet per year (AFY) of potable water to the approximately 1.3 million residents of the City service area. The PUD purchases up to 90 percent of its water from the San Diego County Water Authority (SDCWA), which in turn purchases most of its water from the MWD. MWD imports water from two primary sources for southern California. One source is the Colorado River, which is connected to the MWD's six-county service area through a 242-mile aqueduct. Another source is water from northern California, which supplies water through a series of dams and aqueducts known as the California State Water Project. While the PUD imports the majority of its water, it also relies on three local supply sources to meet or offset potable water demands. These include local surface water, conservation, and recycled water. MWD is active in increasing local supplies through sponsoring recycling, conservation, groundwater recovery, and desalination efforts. Imported supplies also help to replenish local groundwater basins.

The availability of sufficient imported and regional water supplies to serve existing and planned uses within the PUD service area is demonstrated through the MWD and SDCWA water management plans.

The PUD maintains surface storage reservoirs, water treatment plants, and pump stations as part of their water system. The water system also includes transmission and distribution pipelines to deliver potable water to developed areas.

The existing water distribution system in the project area includes a dual 10-inch public water main located in Pomerado Road adjacent to the project site. The existing Chabad Center, located east of the project site, includes a private access drive with dual 10-inch water mains. Currently, there are no on-site water lines.

4.12.1.2 Wastewater Systems

The PUD provides wastewater collection, treatment, and disposal services to the San Diego region through its Metropolitan Sewerage System. The system serves a population of 2.2 million from 16 cities and districts within the greater San Diego area, which generates approximately 180 million gallons per day (gpd) of wastewater. Planned improvements to existing facilities would increase wastewater treatment capacity to serve an estimated population of 2.9 million through the year 2050, when nearly 340 million gpd of wastewater are anticipated to be generated.

Facilities in the Metropolitan Sewerage System include the Point Loma Wastewater Treatment Facility, ocean outfall pipes, pump stations, interconnecting interceptor sewers, and North City and South Bay Water Reclamation Plants. The Point Loma Wastewater Treatment Facility treats approximately 175 million gallons per day (mgd) generated in a 450 square mile area, and has a capacity of 240 mgd. The North City Water Reclamation Plant has a capacity of 30 mpd, and the South Bay Water Reclamation Plant has a capacity of 15 mgd.

There are currently no sewer facilities on the project site. Pomerado Road to the north and Chabad Center Driveway to the east are constructed with public sewer facilities. There is an existing 8-inch sewer main within the public utility easement in Chabad Center Driveway. The 8-inch sewer connects to an existing 15-inch public sewer in Pomerado Road.

4.12.1.3 Solid Waste

Solid waste generated in the City is mainly collected by City-franchised haulers. In addition to the service provided by these haulers, the City provides waste collection pursuant to the People's Ordinance to single-family residences on public streets. There are three major disposal facilities within the San Diego region and several material recovery facilities that sort segregated and comingled recyclable materials for shipping to processing centers. The three disposal facilities are the City-operated Miramar Landfill, and the privately-operated Sycamore and Otay landfills. Based on current and projected disposal rates, and permitted disposal limits, the San Diego region is anticipated to exceed landfill capacity within the next few years unless landfill expansions are approved. Below is a description of each of these landfills based on their Solid Waste Facility Permit and the Solid Waste Information System (State of California 2011), and the *Five-Year Review Report of the County Integrated Waste Management Plan for the County of San Diego* (County of San Diego 2011).

The Miramar Landfill is permitted to receive 8,000 tons per day. As of July 30, 2007, its remaining capacity is approximately 16.5 million cubic yards (cy). The Miramar Landfill is expected to be operational until 2022. The Sycamore Landfill is permitted to receive a maximum of 3,965 tons per day. This landfill has a remaining capacity of 47.4 million cy as of September 30, 2006.

The Sycamore Landfill is expected to remain open until 2031. The Sycamore Landfill Expansion Project, approved on October 2, 2012, would increase the landfill capacity to 153 million cubic yards, and tons per day would be increased to 11,450 phased-in over time and consistent with the San Diego franchise agreement. With the expansion, the landfill would be operational until approximately 2042.

The Otay Landfill is permitted to receive 5,830 tons per day. The projected closure date of this landfill is 2027.

In an effort to address landfill capacity and solid waste concerns, the California Legislature passed the Integrated Waste Management Act in 1989 (California State Assembly Bill [AB] 939), which mandated that all cities reduce waste disposed in landfills from generators within their borders by 50 percent by the year 2000. In response, the City Environmental Services Department (ESD) developed the Source Reduction and Recycling Element, which outlines waste management policies and programs to achieve the mandated waste reduction. Since 2004, the City has diverted more than 50 percent of its generated waste stream from disposal. AB 341 (chaptered in 2011) has set the new diversion target at 75 percent for construction waste.

The site is currently vacant with the exception of a baseball field. The only waste currently generated on-site is that associated with use of the baseball field, and is minimal.

4.12.2 Significance Determination Thresholds

Based on the City's 2011 Significance Determination Thresholds, impacts related to public utilities would be significant if the project would:

1. Result in the need for new systems, or require substantial alterations to existing utilities, the construction of which would create physical impacts (water, sewer, and solid waste disposal);

2. Result in the use of excessive amounts of water;

3. Result in landscaping which is predominantly non-drought resistant vegetation.

4.12.3 Issue 1: Utilities

Would the project result in the need for new systems, or require substantial alterations to existing utilities, the construction of which would create physical impacts (water, sewer, and solid waste disposal)?

4.12.3.1 Impacts

a. Water Supply

The City's Water Supply Assessment (2014) evaluated the adequacy of the planned water supplies to serve projected demands of the project. Pursuant to the Water Supply Assessment, the water demand projections for the project are included in the regional water resource planning documents of the SDCWA, MWD, and partially in the City's 2010 Urban Water Management Plan (UWMP). These plans identify current and future water supplies, as well as actions necessary to develop the future water supplies. Table 4.12-1 provides a breakdown of the project's anticipated water demand and identifies how the project's demand has been accounted for in the various water supply planning documents. As detailed in the table, the project's anticipated water demand is 92,350 gpd or 103.4 AFY. The planned water supply has been identified within the City's 2010 UWMP (15.5 AFY) and through the SDCWA's Accelerated Forecasted Growth (88 AFY).

The SDCWA's 2010 UWMP provides for a comprehensive planning analysis at a regional level and includes water use associated with accelerated forecasted residential development as part of its municipal and industrial sector demand projections. The forecasted housing units were identified by the SANDAG land use plan in the course of its regional housing needs assessment, but are not yet included in existing general land use plans of local jurisdictions. The demand associated with accelerated forecasted residential development is intended to account for SANDAG's land-use development currently projected to occur between 2035 and 2050, but has the likely potential to occur on an accelerated schedule. When necessary, this additional demand increment, termed Accelerated Forecasted Growth, can be used by member agencies to meet the demands of development projects not identified in the general land use plans.

The Water Supply Assessment found that there would be adequate planned water supply to serve the project, based on the water supplies that were projected for the project site in the City's UWMP in addition to using the Accelerated Forecasted Growth demand increment in the SDCWA's 2010 UWMP. The planned water demand for the project site, pursuant to the City's 2010 UWMP, is 13,800 gpd, or 15.5 AFY. This amount is 78,550 gpd, or 88 AFY, less than the projected water demands of the project. These remaining water needs are accounted for in the planned water supply through the use of the Accelerated Forecasted Growth demand increment of the SDWCA's 2010 UWMP.

To ensure local agencies account for projects that use the accelerated forecasted growth demand increment in the UWMP, the SDWCA tracks the certified EIRs that include water supply assessments that utilize the accelerated forecasted growth demand increment to demonstrate adequate supplies for the development. Future UWMP updates would be based on SANDAG's most recently updated forecast, which would include the project. Therefore, the project would not result in additional water demand beyond the planned water supplies accounted for in existing water planning documents.

TABLE 4.12-1
WATER DEMAND ANALYSIS

Planned Water Demands for the Project Site per the 2010 UWMP				
Category	**Quantity**		**Estimated Potable Water Use**	
			Gallons per Day (gpd)	Acre-feet per Yea (AFY)
Employees[1]	*230*		***13,800***	***15.5***
Projected Water Demands for the Project				
Buildings	**Square Feet**	**Units/Beds/ Employee/Meal**	**Gallons per Day (gpd)**	**Acre-feet per Year (AFY)**
Villas[2]	3,039	64	6,080	6.81
Garden Terrace[3]	4,182	48	2,880	3.23
Independent Living Units[4]	8,394	288	13,248	14.84
Guest Suites (studio)[4,5]	400	4	184	0.21
Total Assisted Living Units		**404**		**25.09**
Skilled Nursing Beds[6]	790	60	7,380	8.27
Acute Assisted Living[6]	1,875	50	6,150	6.89
Total Health Center Units		**110**		**15.1**
Common Dining Hall[7,8]	8,008	520	5,200	5.82
Central Plant[9]	10,066	-	2,374	2.66
Laundry[10]			2,537	2.84
Total Employee for the entire facilities[1,11]		198	11,880	13.31
Landscaping[12]	**975,084**	**-**	**34,437**	**38.57**
		TOTAL	***92,350***	***103.4***

Net Water Demands	**Acre-feet per Year (AFY)**
Projected	103.4
City of San Diego 2010 UWMP – Planned	15.5
Planned from SDWCA's Accelerated Forecasted Growth	88.0
Unanticipated Demands	0.0

An acre-foot of water equals 325,851 gallons, which is enough water for two average families of four for one year.

[1]60 gallons per person per day is based on City data for employment water use (includes nominal landscaping water use)

[2]The average water usage for Villas (95 gpd per unit) was provided by the applicant and reviewed by City staff and is based on billing data for two different years from a similar facility

[3]The average water usage for Garden Terrace (60 gpd per unit) was provided by the applicant and reviewed by City staff and is based on billing data for two different years from a similar facility

[4]The average water usage Independent Living (46 gpd per unit) was provided by the applicant and reviewed by City staff and is based on billing data for two different years from a similar facility

[5]Guest suites are assumed to have water usage equivalent to the Independent Living Units

[6]123 gpd per unit is the City's reviewed estimate for a hospital (skilled nursing and acute assisted) bed

[7]Information on estimated number of meals per day based on the person per household in each assisted living unit (1.3 each) and assuming that the residents will have one meal a day every day

[8]Restaurant water usage is estimated at 10 gallons per meal/customer per day (Restaurant water usage from using data from Amy Vickers – 'Water Use and Conservation')

[9]Based on the estimated water usage at the similar facility (University Village Thousand Oaks)

[10]Based on the model specification of the proposed washing machines

[11]Number of employee for the project per the information provided by the applicant

[12]Landscaping water demands are based on the proposed landscape information provided by the applicant and the City's on-line landscaping watering calculator (http://apps.sandiego.gov/landcalc/start.do)

b. Water System

A water study was prepared for the project to determine the on-site and off-site facilities that would be required to provide potable water service to the project and to provide the City with information regarding the existing and proposed conditions in order that the City may model their public water system to confirm adequate capacity for the project.

The existing water distribution system in the project area includes a dual 10-inch public water main located in Pomerado Road adjacent to the project site and dual 10-inch water mains located in Chabad Center Driveway.

The proposed water mains would be located within private drives throughout the project site. The project's main entry, which would connect to Chabad Center Driveway, would contain dual water mains. These water mains would connect to the existing dual water mains in Chabad Center Driveway to continue to provide water redundancy into the project site from Pomerado Road. Additional private water mains are proposed to be located within on-site roadways. The proposed water main system would be developed to provide looped water mains, where possible, to reduce the number of dead-end mains.

Water systems would be designed to meet City requirements of a public system. Phasing of the improvements is not known at this time. Phasing, if required, would be based on the schedule for developing public improvement plans, obtaining permits, and the applicant's ability to finance and construct the project and associated improvements.

The City's Water and Sewer Design Guide was used for system layout and performance standards. Per the guide, every water main must be capable of supplying a minimum static pressure of at least 65 pounds per square inch (psi). Operating pressures under the peak hour demand and the maximum day peak hour demand plus fire flow shall not fall more than 25 psi below the respective static pressure, and residual water main pressure must not fall below 40 psi. During fire conditions, an operating pressure of at least 20 psi must be maintained in the main near the fire, while a drop in pressure of no more than 25 psi below static is desirable in the remainder of the water system.

The proposed water system was modeled to determine if it would provide minimum residual pressures given maximum day demands plus fire demand conditions or peak hour demand conditions. Water demands indicate that the minimum pressure of 40 psi would be achieved per the City Water Department Facility Design Guidelines. Additionally, the maximum day plus fire flow indicated that the minimum pressure of 20 psi would be achieved. The existing infrastructure contained within the district would supply adequate pressure for the project.

Based on City pressure criteria and proposed pad elevations, the project site would be served by a reduced 850 pressure zone from the City's existing 1020 pressure zone. The proposed pressure reducing systems would be located at the points of connection to the existing water

mains in Chabad Center Driveway. On-site static pressure within the project site would range from 82.5 psi to 91.8 psi.

Activities necessary to construct the proposed on-site facilities could temporarily impact traffic circulation and ambient noise levels, and may result in emissions that exceed established standards for air quality. Construction-related impacts are addressed under each of these issue areas within this EIR; no additional significant impacts associated with the construction of new sewer facilities are identified.

c. Wastewater System

An analysis of the local wastewater system was conducted in order to determine whether the proposed private wastewater system(s) would meet the City and California Uniform Plumbing Code standards and determine if the existing sewer system has capacity to support the project.

The proposed sewer mains would be located within private on-site drives throughout the project site. The project would design and construct the new sewer facilities to meet the requirements of the California Uniform Plumbing Code. Phasing, if required, would be based on the schedule for developing public improvement plans, obtaining permits, and the Applicant's ability to finance and construct the project and associated improvements.

Wastewater from the project would discharge into the existing public 8-inch sewer main located in Chabad Center Driveway. The northeasterly discharge point/connection to Chabad Center Driveway would serve all units. The proposed on-site sewer system would utilize gravity flow (i.e., there are no pump stations). The size of the proposed sanitary sewer mains is based on the City's Sewer Design Guide and California Uniform Plumbing Code. All of the on-site private sewer mains and laterals would be designed to maintain the minimum required horizontal separation from private water mains.

Because the project type is not a standard City project type, water demand for the project was calculated using water demand data from similar CCRCs. This data was used in the preparation of the Sewer Study (Appendix M). An equivalent population of 2.0 was used in lieu of the 3.5 from the City's Density Conversion Table. Appendix M summarizes the estimated sewer flow calculations for the project. The peak flow from the project would be 201,800 gpd.

In addition to the flow estimates, this Sewer Study also evaluated the hydraulics of the on-site private sewer mains as well as the off-site public sewer main in Chabad Center Driveway. Determination of the preliminary size of the proposed sanitary sewer mains was based on the City Sewer Design Guide, October 2004 and Handbook of Hydraulics, 6th Edition, Brater and King. The results of the analysis demonstrate that the proposed on-site private sewer mains, as well as the existing public sewer main in Chabad Center Driveway, would meet the City's required minimum cleansing velocity (2 feet per second) and maximum d_n/D (0.5) requirements in accordance with the City Sewer Design Guide. In addition, the project does not cause any significant impacts to the existing off-site public 8-inch sewer main in Chabad Center Driveway.

The project proposes only on-site improvements related to the sewer system. The Sewer Study confirms that the infrastructure for the project has been adequately designed to meet City standards. The system velocities of all effluent have been designed to sustain the threshold of the flow velocity within the limits of existing standards.

Activities necessary to construct the proposed on-site facilities could temporarily impact traffic circulation, ambient noise levels, and may result in emissions that exceed established standards for air quality. Construction-related impacts are addressed under each of these issue areas within this EIR; no additional significant impacts associated with the construction of new wastewater facilities are identified.

d. Solid Waste

The City requires all new development projects within a 40,000 square foot threshold to prepare a WMP that addresses waste generated during short-term project construction and long-term post-construction operation. The WMP is required to identify how the project would reduce waste and achieve target reduction goals and must include: projected waste generation calculations and identification of the types of waste materials generated; description of how materials would be reused on-site; identification of source separation techniques for recycling; and identification of recycling and reuse facilities where waste would be taken if not reused on-site.

To facilitate operational waste reduction, new multi-dwelling residential and commercial/industrial developments must also comply with the City's Municipal Code requiring provision of adequate space for storage and collection of refuse and recyclable materials. On-site recyclables collection is now required for all single- and multi-dwelling residential and commercial uses in accordance with the City's Recycling Ordinance, adopted November 2007. The focus of the ordinance is on education, with responsibility shared between the ESD, haulers, and building owners/managers. ESD is to provide on-site technical assistance, educational materials, templates, and service provider lists. Property owners/managers are to provide on-site recycling services and educational materials annually and to new tenants. Occupants/tenants will participate in the program by separating recyclables from trash.

Waste would be generated from both construction and operation of the project. During construction, the project would generate waste from both demolition of existing facilities and construction of new facilities on-site. The site is currently vacant with the exception of a baseball field, and the project would not require demolition of any permanent building, concrete, or asphalt. Project construction would require the removal of baseball field materials, such as fence material, the dugout box, and other miscellaneous field items. The project would construct approximately 823,850 square feet, which is above the City's 40,000-square-foot threshold for cumulative impacts on solid waste facilities, but less than the City's 1,000,000-square-foot threshold for direct impacts on solid waste facilities. As such, direct impacts would be less than significant, but cumulative impacts would be potentially significant. The project is therefore required to prepare a WMP to show that solid waste impacts would be reduced to below a level

of significance. A conceptual waste management plan has been prepared for the project (included as Appendix N).

Project construction would require the removal of baseball field materials, such as fence material, the dugout box, and other miscellaneous field items. All material removed would be given back to Alliant International University for reuse elsewhere on their property. Therefore, it is expected that 100 percent of the miscellaneous material generated from project's demolition waste would be diverted. The project site also requires removal of trees and scrub for development. The WMP estimates that 517,973 tons of landscape waste would be generated. Landscape material would be sent to the Miramar Greenery for a diversion rate of 100 percent. Furthermore, it is anticipated that all grading would be balanced on site. Thus, it is estimated that 100 percent of the demolition/site preparation materials would be diverted from landfills.

The WMP estimates that, during construction of the proposed new facilities, approximately 1,236 tons of construction materials waste would be generated and require disposal. As described in the WMP, the project would achieve a diversion rate of 75 percent for these materials. The project would be required to pay a refundable Construction and Demolition Debris Diversion Deposit along with submittal of the WMP at the time of building permit or demolition permit issuance. The applicant would receive the refunded deposit when evidence of the actual diversion rate for construction/demolition shows that the WMP goal was achieved. With implementation of the WMP, impacts to solid waste facilities during construction and demolition of the project would be less than significant.

Once project construction is complete, the project would generate solid waste associated with project operation. Wastes would include paper, cardboard, food, bio/hazardous wastes, and green waste. With full buildout, the project is anticipated to generate approximately 476 tons of waste per year. As discussed previously, the project, per the City of San Diego Recycling Ordinance (Municipal Code Chapter 6, Article 6, Division 7), is required to prepare and implement a WMP that specifies how solid waste would be recycled during operations to the maximum extent possible. Recycling bins would be provided throughout the facility. The facility would educate its employees and residents to recycle all paper products, cardboard, glass, aluminum cans, recyclable plastics, and yard waste. These products would be source separated by the appropriate labeling method. Specifically, the project grounds would include recycle bins that would be located in dedicated trash enclosures and picked up by a waste management company consistent with the City LDC requirements. With implementation of the WMP, impacts to solid waste facilities (landfills, materials recovery facilities and transfer stations, and services, including collection), resulting from operation of the project would be less than significant.

4.12.3.2 Significance of Impacts

a. Water Supply

Pursuant to the Water Supply Assessment, the water demand projections for the project are included in the regional water resource planning documents of the SDWCA, MWD, and partially in the City's 2010 UWMP. These plans identify that current and future water supplies would be adequate to serve the projected needs of the project, as well as regional water needs. As a result, no new or expanded sources of water supply would need to be developed that could result in physical impacts to the environment. As the existing and planned water supply is adequate to serve the water demands of the project, impacts would be less than significant.

b. Water System

Water distribution pipelines would be installed within project streets on-site. No off-site improvements or new facilities would be required. The hydraulic analysis conducted for the project determined that the proposed infrastructure would support a minimum pressure, would not exceed the maximum velocity, and would supply adequate pressure for the project. The infrastructure would meet City Water Department Facility Design Guidelines, and impacts would be less than significant.

c. Wastewater System

Wastewater infrastructure would be installed within project streets on-site. No off-site improvements or new facilities would be required. The sewer study evaluated the hydraulics of the proposed on-site private sewer mains as well as the existing 8-inch public sewer main in Chabad Center Driveway. The results of the analysis demonstrates that the proposed on-site private sewer mains as well as the existing public sewer main in Chabad Center Driveway meet the City's required minimum cleansing velocity and maximum d_n/D (0.5) requirements in accordance with the City Sewer Design Guide. Therefore, the proposed private sewer mains meet the City and California Uniform Plumbing Code's requirements. In addition, the project would not cause any significant impacts to the existing off-site public 8-inch sewer main in Chabad Center Driveway. Impacts would be less than significant.

d. Solid Waste

The project would generate solid waste during both the construction and operation phases. The WMP estimates that the total amount of landscape waste from construction would be 517,973 tons. Project construction would also require the removal of baseball field materials, such as fence material, a dugout box, and other miscellaneous field items that would be returned to Alliant International University. The project would be required to pay a Construction and Demolition Debris Diversion Deposit along with submittal of the WMP at the time of building permit issuance. The applicant will receive the refunded deposit when evidence of the actual diversion rate for construction/demolition shows that the minimum requirement of 75 percent

diversion was achieved. With implementation of the WMP, impacts to solid waste facilities during construction of the project would be less than significant.

Once project construction is complete, the project would generate solid waste associated with operation. Wastes would include paper, cardboard, food, bio/hazardous wastes, and green waste. With full buildout, the project is anticipated to generate approximately 476 tons of waste per year. As discussed previously, the project would comply with the City's Recycling Ordinance (Municipal Code Chapter 6, Article 6, Division 7). With implementation of the WMP, impacts to solid waste facilities resulting from operation of the project would be less than significant.

4.12.3.3 Mitigation, Monitoring, and Reporting

Impacts would be less than significant. No mitigation is required.

4.12.4 Issue 2: Water Conservation

Would the project result in the use of excessive amounts of water?

4.12.4.1 Impacts

Table 4.12-1 provides a breakdown of the project's anticipated water demand. As indicated in the table, the anticipated water demand is 92,350 gpd, or 103.4 AFY. The project's water demand would serve the proposed resident population, project landscaping, and facility operations, including laundry and kitchen facilities. Approximately 37 and 39 percent of the project's water demand is attributable to the project's landscape irrigation needs and the assisted living and health center units. Details regarding the water conservation features associated with the project landscaping are provided in Section 4.12.5, below. As discussed in Section 4.10, the project would incorporate a number of water conservation features. The project would reduce water consumption by 30 percent. This is a 10 percent increase over CALGreen requirements. Water-efficient plumbing fixtures, including low-flow shower heads and low-flush toilets, would be used. Landscaping water conservation features would include low-water use native vegetation, minimizing turf, organic amendments to retain moisture, permeable surfaces to infiltrate water, reuse of native cobblestones, bio-filters to clean and hold water on-site, and high-efficiency, low-maintenance irrigation.

As discussed in Section 4.12.3.1, the Water Supply Assessment found that there would be adequate planned water supply to serve the project. Various conservation measures would be integrated into the project design to maximize water efficiency, conservation, and reuse. Accordingly, the project would not use excessive amounts of water, and impacts would be less than significant.

4.12.4.2 Significance of Impacts

The project's anticipated water demand is 92,350 gpd or 103.4 AFY. The project's water use would not be considered excessive considering the type of use proposed and the conservation

measures that would be incorporated into the project design. With incorporation of landscape water conservation measures and water-efficient plumbing fixtures, a 30 percent reduction in water consumption is expected. As a result, impacts would be less than significant.

4.12.4.3 Mitigation, Monitoring, and Reporting

Impacts would be less than significant. No mitigation is required.

4.12.5 Issue 3: Landscaping

Would the project result in landscaping which is predominantly non-drought resistant vegetation?

4.12.5.1 Impacts

The project includes new landscaping throughout the project site requiring water use for irrigation purposes. The landscaping plan is shown in Figures 3-2a and 3-2b. The project would be required to adhere to existing City regulations (LDC Section 142.0403(b)(2) of the Landscape Regulations) to ensure that acceptable plants are selected for landscaping. Additionally, based on plants selected, the facility would be granted a maximum applied water allowance according to Section II, Irrigation Systems, of the Landscape Standards in the City's LDC; the maximum applied water allowance would be based on the landscape design package approved for the project.

The landscape standards, found in the City's Land Development Manual, provide direction for the placement of preferred plants. Preferred plants are water-conserving plants that are easily maintained and have no known history of problems, and acceptable plants are those satisfying minimum performance standards. In addition to identifying specific plants, the Landscape Standards provide guidance for drainage installation and maintenance. This assures landscape systems are designed, constructed, and managed to maximize overall irrigation efficiency within the limits established by the maximum applied water allowance. Adherence to the General Plan policies would also serve to assure the use of drought-tolerant plantings for project landscape plans. As discussed previously, landscaping water conservation features would include low-water use native vegetation, minimizing turf, organic amendments to retain moisture, permeable surfaces to infiltrate water, reuse of native cobblestones, bio-filters to clean and hold water on-site, and high-efficiency, low-maintenance irrigation.

4.12.5.2 Significance of Impacts

The project would comply with existing regulations, as well as the General Plan policies, which would ensure the use of predominantly drought-resistant landscaping and water conservation for landscape maintenance. Impacts would therefore be less than significant.

4.12.5.3 Mitigation, Monitoring, and Reporting

Impacts would be less than significant. No mitigation is required.

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4.13 Energy Conservation

This section evaluates potential impacts to energy conservation in accordance with Appendix F of the CEQA Guidelines and federal, state, and regional regulations. Public Resources Code Section 21100(b)(3) and CEQA Guidelines Section 15126.4 require EIRs to analyze energy conservation as it is applicable to the project, and in particular to describe any wasteful, inefficient, and unnecessary consumption of energy caused by a project. The analysis of energy conservation consists of a summary of the energy regulatory framework, the existing conditions at the project site, a discussion of the project's potential impacts on energy resources, and identification of the project design features that would reduce energy consumption.

4.13.1 Existing Conditions

4.13.1.1 San Diego Gas & Electric

SDG&E is the owner and operator of natural gas and electricity transmission and distribution infrastructure in San Diego County. SDG&E is regulated by the California Public Utilities Commission (CPUC), which is responsible for making sure that California utilities' customers have safe and reliable utility service at reasonable rates and sets the gas and electricity rates for SDG&E. The project's energy needs would be supplied through the various combinations of energy resources available within the project area, and involving the anticipated future energy resource use patterns discussed in this section.

Table 4.13-1 lists SDG&E's current energy sources as of 2011. As shown, SDG&E uses biomass, geothermal, hydroelectric, solar, and wind sources and obtained 15.7 percent of its energy from renewable resources in 2011. Updated data indicates that in 2012, SDG&E obtained 20.3 percent of its energy from renewable sources (CPUC 2013). As directed by the California Renewables Portfolio Standard in Senate Bill 1078, SDG&E and other statewide energy utility providers are targeted to achieve a 33 percent renewable energy mix by 2020 (see also Section 4.10.1.1(b), Renewables Portfolio Standard).

TABLE 4.13-1
SDG&E POWER CONTENT

Energy Source	SDG&E 2009 Power Mix* (actual)
Eligible Renewables	15.7%
Biomass and waste	3.2%
Geothermal	4.4%
Small hydroelectric	0.1%
Solar	0.0%
Wind	7.9%
Coal	2.7%
Large Hydroelectric	0.0%
Natural Gas	42.8%
Nuclear	20.4%
Unspecified source of power*	18.4%
TOTAL	**100%**

SOURCE: SDG&E 2011.
NOTE: Totals may vary due to independent rounding.
*Unspecified source of power" means electricity from transactions that are not traceable to specific generation sources.

Power generation and power use are not linked geographically. Electricity generated within the San Diego region is not dedicated to users in the SDG&E service area. Instead, electricity generated in the county is fed into the statewide utility grid and made generally available to users statewide. SDG&E purchases electricity from this statewide grid, through various long-term contracts. Natural gas is also imported into southern California and originates from any of a series of major supply basins located from Canada to Texas. Gas is pumped out and shipped to receipt points that connect with major interstate gas pipelines. The Wheeler receipt point, located near Bakersfield, California, is where SDG&E receives deliveries of Canadian natural gas to be received into the southern California gas system. Several liquid natural gas plants are proposed in Mexico, which would provide an additional source of natural gas to southern California. SDG&E currently purchases nearly 80 percent of its electricity and natural gas needs from out-of-region energy sources.

4.13.1.2 Regulatory Setting

The following regulations and guidelines provide the framework for energy conservation. According to the majority of these programs and their requirements, the increased and growing demands for non-renewable energy supplies are best addressed through conservation.

Federal and state agencies regulate energy use and consumption through various means and programs. On the federal level, the U.S. Department of Transportation, the U.S. Department of Energy (DOE), and the EPA are three federal agencies with substantial influence over energy policies and programs. Generally, federal agencies influence and regulate transportation energy consumption through establishment and enforcement of fuel economy standards for

automobiles and light trucks, through funding of energy-related research and development projects, and through funding for transportation infrastructure improvements.

On the state level, the CPUC and CEC are two agencies with authority over different aspects of energy. The CPUC regulates privately owned utilities in the energy, rail, telecommunications, and water fields. The CEC collects and analyzes energy-related data, prepares statewide energy policy recommendations and plans, promotes and funds energy efficiency programs, and adopts and enforces appliance and building energy efficiency standards.

a. Federal

Federal Energy Policy and Conservation Act and Amendments

Minimum standards of energy efficiency for many major appliances were established by the U.S. Congress in the federal Energy Policy and Conservation Act of 1975, and have been subsequently amended by succeeding energy legislation, including the federal Energy Policy Act of 2005. The DOE is required to set appliance efficiency standards at levels that achieve the maximum improvement in energy efficiency that is technologically feasible and economically justified.

Corporate Average Fuel Economy Standards

The federal Corporate Average Fuel Economy (CAFE) standard determines the fuel efficiency of certain vehicle classes in the United States. In 2007, as part of the Energy and Security Act of 2007, CAFE standards were increased for new light-duty vehicles to 35 miles per gallon by 2020. In May 2009, plans were announced to increase CAFE standards to require light-duty vehicles to meet an average fuel economy of 35.5 miles per gallon by 2016 (see also Section 4.10.1.1(a) CAFE Standards).

Energy Independence and Security Act of 2007

The Energy Independence and Security Act of 2007 established new standards for a few equipment types not already subjected to a standard, and updated some existing standards. Perhaps the most significant new standard it established is for general service lighting, which will be deployed in two phases. First, by 2012–2014 (phased over several years), common light bulbs will be required to use about 20–30 percent less energy than present incandescent bulbs. Second, by 2020, light bulbs must consume 60 percent less energy than today's bulb; this requirement will effectively phase out the incandescent light bulb.

b. State

Renewables Portfolio Standard

The RPS promotes diversification of the state's electricity supply. Originally adopted in 2002 with a goal to achieve a 20 percent renewable energy mix by 2020, the goal has been

accelerated and increased, most recently so by Executive Orders (EOs) S-14-08 and S-21-09, to a goal of 33 percent by 2020. Its purpose is to achieve a 33 percent renewable energy mix statewide, providing 33 percent of the state's electricity needs met by renewable resources by 2020 (CARB 2008). Increasing the RPS to 33 percent is designed to accelerate the transformation of the electricity sector, including investment in the transmission infrastructure and systems changes to allow integration of large quantities of intermittent wind and solar generation. Renewable energy includes (but is not limited to) wind, solar, geothermal, small hydroelectric, biomass, anaerobic digestion, and landfill gas. Increased use of renewables would decrease California's reliance on fossil fuels.

California Code of Regulations Title 24, Part 6 California Energy Code

All new construction in California must meet Title 24 energy standards (CEC 2008). Title 24, which provides energy efficiency standards for residential and non-residential buildings, was established in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to incorporate new energy efficiency technologies and methods. For example, the current Title 24 standards achieve a minimum 15 percent reduction in the combined space heating, cooling, and water heating energy compared to the previous 2005 Title 24 energy standards. The most recent amendments to the Energy Code, known as 2013 Title 24, or the 2013 Energy Code, become effective January 1, 2014 (see also Section 4.10.1.1(b) California Energy Code).

California Code of Regulations Title 24, Part 11 California Green Building Code

The California Green Building Standards Code, referred to as CALGreen, was added to Title 24 as Part 11 in 2009, and became effective January 1, 2011. This code institutes mandatory minimum environmental performance standards that include the same energy efficiency requirements as Part 6 of Title 24, with optional Tier I and II standards for even greater energy efficiency. The code also mandates a 20 percent reduction in indoor water use, with voluntary goals and incentives for projects achieving 30 percent and over reduction. Because the provision of water involves large amounts of energy consumption, reduced water consumption would result in reduced energy demand (see also Section 4.10.1.1(b) California Green Building Code).

Energy Action Plan

The state Energy Action Plan, drafted and approved in 2003 by the CPUC, the California Energy Commission, and the California Power Authority, provides policy guidance for future resource additions. The goal of the Energy Action Plan (2003, updated in 2005) is to ensure that adequate, reliable, and reasonably priced electrical power and natural gas supplies, including prudent reserves, are achieved and provided through policies, strategies, and actions that are cost-effective and environmentally sound for California's consumers and taxpayers (State of California 2005b).

c. Regional

SDG&E Long-Term Resource Plan

In 2004, SDG&E filed a long-term energy resource plan (LTRP) with the CPUC, which identifies how it will meet the future energy needs of customers in SDG&E's service area. The LTRP identifies several energy demand reduction (i.e., conservation) targets, as well as goals for increasing renewable energy supplies, new local power generation, and increased transmission capacity.

Consistent with Senate Bill 1078, the goals for increased renewable energy supplies in the 2004 LTRP called for acquiring 20 percent of SDG&E's energy mix from renewables by 2010 and 33 percent by 2020. This bill requires the state's three investor-owned utilities, including SDG&E, to increase their purchases of power generated from renewable resources in order to reduce reliance on fossil fuels and to reduce GHG emissions.

The LTRP also calls for greater use of in-region energy supplies, including renewable energy installations. By 2020, the LTRP states that SDG&E intends to achieve and maintain the capacity to generate 75 percent of summer peak demand with in-county generation. The LTRP also identifies the procurement of 44 percent of its renewables to be generated and distributed in-region by 2020.

4.13.2 Significance Determination Thresholds

Based on Appendix F of the State CEQA Guidelines, impacts related to energy would be significant if construction and operation of the project would:

1. Result in the use of excessive amounts of electrical power;

2. Result in the use of excessive amounts of fuel or other forms of energy (including natural gas, oil, etc.).

4.13.3 Issue 1: Electricity Use

Would the construction and operation of the proposal result in the use of excessive amount of electric power?

4.13.3.1 Impacts

Neither the State CEQA Guidelines Appendix G nor the City's CEQA Significance Determination Thresholds (2011) contain specific thresholds to identify when a significant energy-use impact has occurred. State CEQA Guidelines Appendix F, Energy Conservation, provides direction as to the type of information, analysis, and mitigation that should be considered in evaluating a project, but does not provide specific energy conservation thresholds.

Per Appendix F of the State CEQA Guidelines, the goal of conserving energy implies the wise and efficient use of energy. In order to assure that energy implications are considered in project decisions, CEQA requires that EIRs include a discussion of the potential energy impacts of projects, with particular emphasis on avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy. Accordingly, potentially significant energy implications of a project should be considered in an EIR.

a. Electricity (Direct)

Electricity consumed by the project was calculated as a part of the GHG emission analysis using the CalEEMod computer program. Building energy use is typically divided into energy consumed by the built environment and energy consumed by uses that are independent of the construction of the building, such as plug-in appliances. In California, Title 24 governs energy consumed by the built environment, mechanical systems, and some types of fixed lighting. Non-building energy use, or "plug-in energy use," can be further subdivided by specific end-use (refrigeration, cooking, office equipment, etc.). CalEEMod thus calculates electricity use by:

Lighting is calculated separately, since it can be both part and not part of Title 24. Natural gas use is distinguished in the model as Title 24 or non-Title 24, similar to electricity consumption.

The total approximate maximum electricity consumption based on CalEEMod default values is estimated to be approximately 3,309,045 kilowatts per hour (kWh) per year, at build-out. The project would incorporate a number of energy savings measures to improve energy efficiency. The project would be constructed in accordance with the 2013 Title 24 energy code, which is estimated to be 25 percent more energy efficient than the previous 2008 Title 24 energy code (Imperial Valley Economic Development Corporation 2013). The increase in energy efficiency can be achieved by using better building components, such as more insulation, higher efficiency windows, house wrap, radiant barriers, and higher-efficiency heating, cooling, and water heating equipment. The project would also reduce energy emissions through the installation of high-efficiency lighting to achieve a 25 percent lighting energy reduction. These measures would reduce the amount of electricity consumed by the project.

Additionally, implementation of RPS diversifies the state's electricity supply. The current RPS goal is to achieve a 33 percent renewable energy mix statewide, providing 33 percent of the state's electricity needs met by renewable resources by 2020. Renewable energy includes (but is not limited to) wind, solar, geothermal, small hydroelectric, biomass, anaerobic digestion, and landfill gas. Increased use of renewables would decrease California's reliance on fossil fuels, and providing cleaner energy.

b. Water Use (Indirect Electricity)

The provision of potable water consumes large amounts of energy associated with source and conveyance, treatment, distribution, end use, and wastewater treatment. This type of energy use is known as embodied energy. The energy consumption associated with water use was

calculated by multiplying the embodied energy in a gallon of potable water by the total number of gallons projected to be consumed by the project. For these estimates, it is projected that water delivered to the project site would have an embodied energy of 2,779 kWh/acre-foot, or 0.0085 kWh/gallon (Torcellini et al. 2003).

The project would reduce water consumption by 30 percent. This is a 10 percent increase over CALGreen requirements. The embodied energy demand associated with water consumption is 543,399 kWh per year. A 30 percent decrease in water consumption can be achieved by use of water-efficient landscapes, installing water-efficient appliances, and increasing the use of recycled water. Water-efficient plumbing fixtures, including low-flow shower heads and low-flush toilets, would be used. Landscaping water conservation features would include low-water use native vegetation, minimizing turf, organic amendments to retain moisture, permeable surfaces to infiltrate water, reuse of native cobblestones, bio-filters to clean and hold water on-site, and high-efficiency, low-maintenance irrigation. By implementing these water saving features, the project would reduce its energy consumption associated with conveyance, treatment, distribution, end use, and wastewater treatment.

4.13.3.2 Significance of Impacts

The project would be constructed in accordance with the 2013 Title 24 energy code, which is estimated to be 25 percent more energy efficient than the previous 2008 Title 24 energy code; install high-efficiency lighting to achieve a 25 percent lighting energy reduction; and decrease water consumption by 30 percent. Given the energy-efficient design in accordance with mandated energy efficiency standards and project design features, the project would not result in the use of excessive amounts of electricity during its long-term operation. Also, given that the City has a total on-system generation capacity of about 2,360 megawatts, the energy consumption from the project would not reduce the available supply of energy resources below a level considered sufficient to meet the City's needs or cause a need for new and expanded facilities.

4.13.3.3 Mitigation, Monitoring, and Reporting

Impacts would be less than significant. No mitigation is required.

4.13.4 Issue 2: Fuel and Other Energy Use

Would the project result in the use of excessive amounts of fuel or other forms of energy (including natural gas, oil, etc.)?

4.13.4.1 Impacts

a. Construction-Related Fuel Use

Grading and construction activities consume energy through the operation of heavy off-road equipment, trucks, and worker traffic.

Heavy equipment requirements for the various construction phases were based on similar projects' construction requirements and assumptions contained in the CalEEMod model used to project air quality and GHG emissions. Table 5 in the air quality technical report (Appendix J) presents a summary of the maximum anticipated heavy equipment requirements for all phases of construction.

Table 4.13-2 summarizes the carbon dioxide (CO_2) emissions and gallons of fuel consumed.

TABLE 4.13-2
CONSTRUCTION FUEL CONSUMPTION

	Off-Road Equipment	Hauling Trucks	Worker Vehicles	Total
CO_2 Emissions (pounds CO_2 per year)				
Site Preparation - 2014	159,901.09	0.00	3,461.25	163,362.34
Grading - 2014	434,155.82	0.00	7,694.12	441,849.94
Building Construction - 2014	799,814.09	393,326.25	731,514.96	1,924,655.31
Building Construction - 2015	815,973.95	402,034.50	730,170.14	1,948,178.60
Paving - 2015	87,501.37	0.00	4,232.87	91,734.24
Architectural Coating - 2015	8,157.09	0.00	21,010.03	29,167.12
Architectural Coating - 2016	286.60	0.00	705.48	992.08
TOTAL	**2,305,790.01**	**795,360.76**	**1,498,788.86**	**4,599,939.63**
Emission Factor (pounds CO_2 per gallon)	*22.67*	*22.37*	*19.56*	--
Fuel Consumed (gallons)				
Site Preparation - 2014	7,053.42	0.00	176.96	7,230.38
Grading - 2014	19,151.12	0.00	393.36	19,544.48
Building Construction - 2014	35,280.73	17,582.76	37,398.52	90,262.00
Building Construction - 2015	35,993.56	17,972.04	37,329.76	91,295.36
Paving - 2015	3,859.79	0.00	216.40	4,076.19
Architectural Coating - 2015	359.82	0.00	1,074.13	1,433.95
Architectural Coating - 2016	12.64	0.00	36.07	48.71
TOTAL	**101,711.07**	**35,554.79**	**76,625.20**	**213,891.06**

As shown in Table 4.13-2, off-road construction equipment would consume approximately 101,711 gallons of diesel fuel, hauling/delivery trucks would consume approximately 35,555 gallons of diesel fuel, and worker vehicles would consume approximately 76,625 gallons of fuel. This results in a total of 213,891 gallons of fuel. More efficient equipment that uses clean-fuel technologies or electric-based engines would be employed wherever feasible during construction to reduce total fuel-energy consumption.

b. Long-term Operational-Related Energy Use

Long-term operational energy use associated with the project includes energy consumption related to obtaining and using water and in disposing of waste, and fuel-energy consumption by operation of vehicles.

Natural Gas Consumption

Building natural gas use is typically divided into energy consumed by the built environment and energy consumed by uses that are independent of the construction of the building. Like electricity, natural gas consumed by the project was calculated as a part of the GHG emission analysis using the CalEEMod computer program.

The total approximate maximum natural gas consumption based on CalEEMod default values is estimated to be approximately 5,794,968 kBtu per year, at build-out.

Additionally, as discussed previously in Section 4.13.3.1(a), the project would be constructed in accordance with the 2013 Title 24 energy code, which is estimated to be 25 percent more energy efficient than the previous 2008 Title 24 energy code (Imperial Valley Economic Development Corporation 2013). This would reduce the amount of natural gas used.

Vehicle Use

Energy in the form of fuel (gasoline) would be consumed by vehicles associated with the project. The project would generate 1,880 ADT. CalEEMod calculates that this trip generation would result in a total of 3,490,298 vehicle miles traveled annually. Based on the Caltrans average projected fuel economy of 18.8 miles per gallon for 2020, the project would consume 185,654 gallons of vehicle fuel annually.

As discussed in Section 4.13.1.2, Regulatory Setting, various federal and state regulations on vehicle and fuel manufacture would likely result in the substantial reduction of the project's vehicle fuel consumption by 2020. Specifically, the CAFE, Low Carbon Fuel Standard, and Pavley regulations would increasingly improve the fuel economy of vehicles manufactured after 2009, as well as increase the availability of and conversion to cleaner fuels.

Additionally, as discussed in Section 4.2, peak hour traffic volumes due to the project would be less than other project types. This is because the staff work shift hours would be outside of normal peak commuting hours; residents would be seniors, many of which would not drive; and both residents and visitors would like choose to avoid peak traffic hours because they are uncomfortable with congestion or have the time and resources to travel during non-peak times. Additionally, the project would provide its own bus and car or van shuttles that would be used for shopping, doctor visits, and outings for the future residents. These measures were not taken into account when calculating the total ADT generated by the project. As such, actual gasoline consumption would be less than that calculated above.

4.13.4.2 Significance of Impacts

Measures to reduce wasteful, inefficient, and unnecessary consumption of energy during operation of the project have been incorporated into the project design. Additionally, vehicle gasoline consumption would be reduced because the project would provide bus and shuttle services. As such, impacts from implementation of the project would be less than significant.

4.13.4.3 Mitigation, Monitoring, and Reporting

Impacts would be less than significant. No mitigation is required.

5.0 Significant Unavoidable Environmental Effects/Irreversible Changes

CEQA Guidelines Section 15126.2(b) and (c) require that the significant unavoidable impacts of the project, as well as any significant irreversible environmental changes that would result from project implementation, be addressed in the EIR.

5.1 Significant Environmental Effects Which Cannot Be Avoided if the Project Is Implemented

In accordance with CEQA Guidelines Section 15126.2(b), any significant unavoidable impacts of a project, including those impacts that can be mitigated but not reduced to below a level of significance despite the applicant's willingness to implement all feasible mitigation measures, must be identified in the EIR. As discussed in Sections 4.1 and 4.2, the project would result in a significant direct and cumulative traffic impact. Impacts could be mitigated by widening Pomerado Road. However, in the Scripps Miramar Ranch planning area, the Scripps Miramar Ranch Planning Board have determined that they did not want to widen Pomerado Road east of Scripps Ranch Boulevard to four lanes, and the widening was deleted from the SMRCP on October 26, 1993, Resolution R-282903. As stated in the SMRCP, "the Scripps Miramar Ranch Planning Board strongly opposes widening of Pomerado Road from two to four lanes. Current levels of traffic congestion are acceptable to the community in order to retain Pomerado Road as a two-lane major street." The four-lane major street widening of Pomerado Road adjacent to the project area was also deleted from the former Pomerado Road Widening Capital Improvements Project programming sheet. More specifically, the SMRCP states "Improvement of Pomerado Road to four lanes between Scripps Ranch Boulevard and Spring Canyon Road is not advocated by this Plan... Further, before the Council takes any action on increasing the size of Pomerado Road from two lanes to four lanes, there must first be an advisory vote or referendum conducted by the City, at City expense, in the Scripps Ranch community." Based on the action by a previous City Council, in approving the 1993 Resolution R-282903, although the project would result in both direct and cumulative street segment and intersection impacts, mitigation is not considered feasible given the City Council and SMRCP action. Therefore, traffic impacts would be considered significant unavoidable impacts of the project. All other significant impacts identified in Section 4.0 of this EIR as resulting from project implementation can be reduced to below a level of significance with the mitigation measures identified in Section 4.0 and in the Mitigation Monitoring and Reporting Program (Section 10.0).

5.2 Irreversible Environmental Changes Which Would Result if the Project Is Implemented

In accordance with CEQA Guidelines Section 15126.2(c):

> Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvements which provide access to a previously inaccessible area) generally commit future generations to similar uses. Also irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.

Non-renewable resources generally include agricultural land, biological, archaeological and paleontological resources, mineral deposits, water bodies, and some energy sources. As evaluated in Section 8.0 of this EIR, implementation of the project would not result in significant irreversible impacts to agricultural or mineral resources.

Indirect and direct impacts to wildlife species, sensitive habitats, wetland and non-wetland streambed waters, and the MHPA would be significant. These impacts would be mitigated through pre-construction surveys and construction monitoring, on-site preservation through an MHPA boundary line adjustment, and wetland restoration.

Implementation of the project would require the irreversible consumption of natural resources and energy. Natural resource consumption would include lumber and other forest products, sand and gravel, asphalt, steel, copper, other metals, and water. Building materials, while perhaps recyclable in part at some long-term future date, would for practical purposes be considered permanently consumed. Energy derived from non-renewable sources, such as fossil and nuclear fuels, would be consumed during construction and operational lighting, heating, cooling, and transportation uses.

To minimize the use of energy, water, and other natural resources, the project would incorporate sustainable building practices into the site, architectural and landscape designs. As described in Section 3.4 of this EIR, design considerations aimed at improving energy efficiency and reducing water use have been incorporated into the project design and may serve to reduce irreversible water, energy, and building materials consumption associated with construction and occupation of the project.

6.0 Growth Inducement

CEQA Guidelines Section 15126.2(d) requires that an EIR:

> Discuss ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included are projects which would remove obstacles to population growth (for example, a major expansion of a waste water treatment plant might allow for more construction in service areas). Increases in the population might tax existing community services facilities, requiring construction of new facilities that could cause significant environmental effects. . . . It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.

The City's 2011 Significance Determination Thresholds provide further guidance to determine potential significance for growth inducement. Based on the Thresholds, a significant impact could occur if a project would:

> Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure). Accelerated growth may further strain existing community facilities or encourage activities that could significantly affect the surrounding environment.

6.1 Population and Growth Projections

According to current SANDAG estimates (SANDAG 2012), the population for the SMRCP area is 19,686. The SMRCP area has 7,227 housing units, a majority of which are detached single-family units. The resulting average persons per household is 2.78.

Implementation of the project would not significantly alter the planned location, distribution, or growth of the human population in the area, as it is a CCRC for older adults who have previously been living independently and desire advanced age services, maintenance free living, and health care support. The project would not result in a substantial increase in population and housing stock, as it would likely serve residents already living in the region. The project would not tax existing community services facilities or require construction of new facilities that would cause significant environmental effects, as discussed in Section 4.11, Public Services.

6.2 Public Infrastructure

Although the project would produce increased demand for fire protection and emergency medical services, police protection, and water, wastewater, and solid waste facilities, these anticipated increases would not significantly tax existing community services facilities or require construction of new facilities that would cause significant environmental effects, as analyzed.

The project site would accommodate development in a location already served by public infrastructure. Because the project is located in an already urbanized area, project implementation would not remove obstacles to population growth. Although the project would add on-site roads and infrastructure, access to the site would be obtained on existing roads, and the larger public infrastructure (e.g., trunk sewers, water mains) have sufficient capacity to support buildout of the project.

7.0 Cumulative Impacts

Section 15130(a) of the State CEQA Guidelines requires a discussion of cumulative impacts of a project "when the project's incremental effect is cumulatively considerable." Cumulatively considerable, as defined in Section 15065(c), "means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects." According to Section 15130 of the CEQA Guidelines, the discussion of cumulative effects "need not be provided in as great detail as is provided the effects attributable to the project alone. The discussion should be guided by the standards of practicality and reasonableness."

The following evaluation of cumulative impacts considers reasonably foreseeable projects in the vicinity of the project site. According to Section 15130(b)(1) of the CEQA Guidelines, the discussion of cumulative effects is to be on either (a) "a list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those impacts outside the control of the agency," or (b) "a summary of projections contained in an adopted plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or area wide conditions contributing to the cumulative impact. Any such planning document shall be referenced and made available to the public at a location specified by the Lead Agency."

The basis of and geographic area for the analysis of cumulative impacts is dependent on the nature of the issue. For this analysis, where evaluation of potential cumulative impacts are localized (e.g., noise, traffic, public utilities), a list of project methods was employed. For potential cumulative impacts that are more regional in scope (e.g., air quality, global warming, biological, and cultural resources), planning documents were additionally used in the analysis.

List of Projects Considered for Cumulative Analysis

Table 7-1 shows the past, present, and probable future projects considered in this cumulative effects evaluation:

TABLE 7-1
LIST OF PROJECTS IN VICINITY USED TO EVALUATE CUMULATIVE EFFECTS

Project Name/Location	Type/Description	Status/Environmental Review
1) Stone Creek Located west of I-15 between Camino Ruiz and Black Mountain Road on both the north and south sides of Carroll Canyon Road. (Project No. 67943)	Mixed use project consisting of 4,445 residential units, 174,000 square feet of retail uses, 200,000 square feet of office space, 850,000 square feet of industrial/business park use, 175 room hotel, and 26.2 acres of neighborhood park space.	Project involves an amendment to the Mira Mesa Community Plan, a Master Planned Development Permit, a Vesting Tentative Map (VTM No. 208328), a SDP, a rezone, and an amendment to CUP 10-315-2. The EIR is currently being prepared and has not yet been circulated for public review.
2) Miramar College Located west of I-15, east of Black Mountain Road, south of Hillery Drive, and north of Gold Coast Drive. (SCH No. 2005101028)	Master Plan for the existing Miramar Community College. The project would expand enrollment to a maximum of 25,000 students.	A Final Mitigated Negative Declaration was completed in February 2007 and was approved by the Facilities Committee in December 2008. Phase 2 is under construction, and Phases 3 and 4 are planned for future construction.
3) Casa Mira View I Located on the west side of I-15, north of Mira Mesa Boulevard. (SCH No. 2007111095, PTS No. 91647)	1,848 multi-family dwelling units.	An EIR was prepared and certified in September 2008. The project is currently under construction.
4) Carroll Canyon Commercial Center Located at northeast corner of I-15 at Carroll Canyon Road. (Project No. 119151, SCH No. 2012081029, PTS No. 240716)	Redevelopment project consisting of 144,800 square feet of commercial space.	Project involves a General Plan Amendment, Community Plan Amendment, rezone, Planned Development Permit, Site Development Permit, Neighborhood Use Permit, and a Vesting Tentative Map. A Draft EIR was completed in September 2013. Applicant is currently pursuing a different land use concept for apartments with retail on this site.
5) Erma Road Apartments Located on south side of Erma Road east of I-15. (Project No. 137944PTS No. 217843)	114 multi-family dwelling units.	Built and occupied.
6) Casa Mira View II Located north of Mira Mesa Boulevard and west of I-15. (Project No. 264497)	319 multi-family dwelling units.	A Mitigated Negative Declaration was prepared for the project, and the project was approved in 2012.
7) Carroll Canyon Business Park (Aspen Creek) Located west of Camino Ruiz and south of Carroll Canyon Road. (Project #, SCH, PTS?)	Industrial/Business Park and Office uses.	Built and occupied.
8) Fenton Carroll Canyon Tech Center Located west of Camino Santa Fe and north of Carroll Canyon Road. (LDR No. 40-0870, SCH No.2000041010)	890,000 square foot Industrial Park.	An EIR was prepared and certified in November 2001. Partially constructed.
9) Watermark Located on Scripps Poway Parkway adjacent to I-15. (Project No. 180357)	600,000 square feet of retail space	An EIR was prepared and the project was approved in December 2013.

Plans Considered for Cumulative Effects Analysis

This cumulative analysis relies on regional planning documents and associated CEQA documents to serve as an additional basis for the analysis of the broader, regional cumulative effects of the project, such as air quality, biological resources, and global climate change. The regional planning documents used in this analysis include: the SDAPCD RAQS, SANDAG's RCP, the City General Plan and EIR, SMRP, and the MSCP. These plans are discussed in Section 4.1.1, Land Use, and/or Section 4.0, Environmental Analysis, of this EIR, and are incorporated by reference in the appropriate sections of the cumulative analysis below.

7.1 Land Use

As a general rule, and as stated in the City's Significance Determination Thresholds for land use, projects that are consistent and compatible with surrounding land uses and the applicable community plan should not result in land use impacts. The project site is designated University use in the SMRCP. The project would amend the existing CUP to allow for the project, and redesignate the site from University to Institutional use. In addition, the project is seeking an SDP for development in ESL, and a PDP to allow deviations from the base zone.

As described in Section 4.1, Land Use, overall, the project would be consistent with most of the City General Plan and SMRCP goals, objectives, and policies regarding the provision of senior housing and health center facilities to meet the needs of the population, preserving open space and dedicating 7.19 acres of resource-based open space to the MHPA, implementing a green building design that includes improved energy efficiency and water conservation, and providing transportation services for its residents. However, the increase in traffic on Pomerado Road would conflict with goals of alleviating traffic in the region. Since Pomerado Road cannot be widened to four lanes, cumulative traffic impacts would remain significant and unmitigated.

7.2 Traffic Circulation

As described in Section 4.2, Traffic Circulation, the project would result in the generation of approximately 1,880 new trips per day. This increase to regional traffic, along with the increase from related projects, would contribute cumulatively to regional traffic congestion.

The traffic report prepared for the project analyzed cumulative impacts at the buildout with project scenario (referred to as the "Year 2030 With Project" condition). According to this analysis, significant cumulative impacts are projected to occur on the following four segments and two intersections:

Street Segments

- Pomerado Road between I-15 northbound ramps and Willow Creek Road.
- Pomerado Road between Willow Creek Road and Scripps Ranch Boulevard.
- Pomerado Road between Scripps Ranch Boulevard and Chabad Center Driveway.
- Pomerado Road between Chabad Center Driveway and Avenida Magnifica.

Intersections

- Pomerado Road and Willow Creek Road.
- Pomerado Road and Scripps Ranch Boulevard.

As detailed in the TIA, if an additional eastbound and westbound through lane were provided on Pomerado Road, street segments would operate at an acceptable LOS, and cumulative impacts would be mitigated to a level less than significant. However, since Pomerado Road cannot be widened to four lanes, the project would have a considerable contribution to significant unavoidable cumulative traffic impacts on Pomerado Road.

7.3 Biological Resources

The City manages its regional biological resources preservation through the adopted MSCP Subarea Plan. The MSCP was designed to compensate for the regional loss of biological resources throughout the region.

As discussed in Section 4.3, Biological Resources, the project would result in direct and indirect impacts to biological resources. Direct impacts would be mitigated through habitat, wetland, and non-wetland preservation/creation/restoration/enhancement and an MHPA boundary line adjustment. The potential for indirect impacts to biological resources in the adjacent MHPA would be mitigated to below a level of significance through adherence to the MHPA Land Use Adjacency Guidelines contained in the MSCP Subarea Plan, as outlined in this EIR's Section 4.1.5.3 mitigation measures. All direct and indirect biological impacts would be mitigated to a level less than significant.

Projects that conform with the MSCP and the LDC requirements (i.e., ESL Regulation and Biology Guidelines) would not be considered to result in a significant cumulative impact for those biological resources (sensitive species and habitat) adequately covered by the MSCP. Other projects within the City that impact sensitive biological resources would be required to adhere to these requirements, and cumulative biological impacts would thus not be considered to be cumulatively significant.

7.4 Noise

In the project vicinity, cumulative noise impacts would generally be attributed to increases in traffic volumes. The noise analysis conducted for this EIR used cumulative traffic volumes identified for area roads in the TIA. As such, the project noise analysis provides a cumulative analysis as well.

As presented in Section 4.4, Noise, the project has the potential to contribute traffic to area roadways. An increase of 3 dB is considered a perceptible increase in noise. Therefore, a significant impact would occur if project implementation would expose on- or off-site, existing, and planned sensitive uses to road noise 3 dB over existing noise levels. The noise analysis shows that on a cumulative basis, when compared to noise levels resulting from existing traffic volumes, the project would result in future cumulative noise increases that are less than 3 dB at all roadway segments. Thus, existing uses in the project vicinity would not be exposed to a significant cumulative increase in noise. The project and all cumulative projects would be required to adhere to the City's noise ordinance. As such, the project would not contribute to a significant cumulative noise level increase, and impacts would be less than significant.

7.5 Historical Resources

Archaeology is a non-renewable resource. Any direct impact would contribute to a cumulative loss.

As addressed in Section 4.5, Historical Resources, the field survey and record search indicate no previously recorded prehistoric or historic cultural resources are present on the subject property; however, there is potential for significant subsurface cultural deposits in a small portion of the Carroll Canyon floodplain. Therefore, construction of the project has the potential to impact unknown subsurface historical resources in this portion of the Carroll Canyon floodplain.

Implementation of mitigation measures outlined in Section 4.5.2.1 would reduce potential direct impacts to historical resources to below a level of significance. Furthermore, the project-level mitigation measures would reduce the project contribution to cumulative historical resource impacts to a less than significant level. Other projects which involve grading would be conditioned in a similar manner to implement measures that would mitigate potential direct impacts to regionally declining historical resources. Implementation of required mitigation measures would reduce the project's contribution to a cumulative loss of important historical resources to below a level of significance. Mitigation, required by each of the past, present, and reasonably foreseeable projects, would also reduce cumulative impacts to below a level of significance.

7.6 Paleontological Resources

The City requires mitigation measures to address the potential for impacts to paleontological resources. These measures are applied to development projects within geologic formations that have a high and moderate potential for fossils throughout the City and include monitoring during grading, collection, and report preparation. All discretionary projects within the project area and the City would be reviewed to determine the likelihood of paleontological resources. Implementation of the mitigation measures noted above would also reduce cumulative impacts to below a level of significance.

Project-level mitigation measures would reduce the project contribution to cumulative paleontological resource impacts to a less than significant level. As discussed in Section 4.6, Paleontological Resources, with implementation of the required mitigation measures, the project's contribution to cumulative impacts would be less than cumulatively considerable, and thus not significant. The project-specific mitigation measures would require monitoring, collection, recordation, and curation and documentation of any significant resources. The project could contribute to cumulative paleontological resource impacts, but implementation of the mitigation measures would ensure that the project's contribution to cumulative impacts would be less than considerable.

7.7 Visual Quality/Neighborhood Character/ Landform Alteration

Implementation of the project would result in a change in the visual character of the existing site, but the change would not be considered adverse or incompatible with surrounding uses, as discussed in Section 4.7, Visual Quality/Neighborhood Character/Landform Alteration. While the project would alter views of the site from Pomerado Road, the project would not block any public view corridors or result in a blockage of a public resource from a public viewing area. Development of the project would be compatible with the adjacent development in the project area and would preserve 5.49 acres of eucalyptus trees on the project site. The Carroll Canyon open space would be preserved as resource-based open space. The project has been designed in accordance with the Steep Hillside Guidelines, and impacts associated with landform alteration would be less than significant. While development in the project area would result in intensification on a cumulative basis, the project's contribution to impacts associated with public views, and community character would be less than considerable because the project would not result in a substantial obstruction of any vista or scenic view from a public viewing area, and would be consistent with and contribute to the character of the project area.

7.8 Health and Safety/Hazardous Materials

As discussed in Section 4.8, Health and Safety/Hazardous Materials, the project would comply with all applicable state and local regulations, including community care state licensing requirements, for handling of medical wastes and other hazardous materials. The project is not listed as a hazardous materials site compiled pursuant to Government Code Section 65962.5.No on-site or off-site RECs were identified that would negatively impact the project site. Federal, state, and local regulations and applicable safety standards would be adhered to during construction and operation of this and any other projects. Additionally, fire safety impacts would be less than significant because the project would implement a brush management program in accordance with City standards designed to prevent the risk of loss, injury, or death from wildfires. Other project would also be required to adhere to City fire safety standards. Therefore, implementation of these requirements would avoid potentially significant cumulative impacts.

7.9 Air Quality

As a regional issue, the cumulative study area for air quality impacts encompasses the SDAB as a whole. Therefore the cumulative analysis addresses regional air quality plans and policies, such as the RAQS, as well as a project's contribution to a net increase of any criteria pollutant for which the SDAB is listed as nonattainment (particulates and ozone). Past development has contributed to this condition, and future development forecasted for the region would generate increased pollutant emission levels from transportation and stationary sources potentially posing cumulatively considerable and significant air quality effects.

The California CAA requires areas that are designated nonattainment of state ambient air quality standards to prepare and implement plans to attain the standards by the earliest practicable date. Since the SDAB is designated nonattainment for ozone, the RAQS was developed to identify feasible emission control measures and provide expeditious progress toward attaining the state ozone standards. The two pollutants addressed in the RAQS are volatile organic compounds and NOx, which are precursors to the formation of ozone. Projected increases in motor vehicle usage, population, and industrial growth create challenges in controlling emissions to maintain and further improve air quality. The RAQS, in conjunction with the TCM, were most recently adopted in 2009 as the air quality plan for the region. The basis for these plans is the distribution of population in the region as projected by SANDAG. Growth forecasting is based in part on the land uses established by the City's General Plan. Normally, if a project is consistent with land use designated in the City's General Plan, it can be considered consistent with the growth assumptions in the RAQS (State of California 1989).

The project is within an area designated for University use in the SMRCP. The project would amend the SMRCP to redesignate the site to Institutional use. The LDC Trip Generation Manual indicates that University uses generate 100 trips per acre. Thus, the project, if developed as a

University use, would generate approximately 5,300 trips. This is greater than the proposed trip generation of 1,880 ADT. Therefore, the project would not result in traffic generation in excess of specific community plan allocations. Because the project would result in fewer trips, project traffic is accounted for in the SANDAG growth forecast, and it would not conflict with the goals and strategies in the RAQS or TCM.

As analyzed in Section 4.9, Air Quality, project construction and operation would result in emissions that would be less than applicable thresholds, and project design features, including the implementation of standard fugitive dust control measures, would reduce the project's incremental contribution to cumulative air quality impacts. Using the ADT projections and intersection parameters identified in the TIA, a CO hot-spot evaluation determined that no significant CO hot spot impacts would result from traffic associated with cumulative projects. The planned or reasonably foreseeable projects in the project vicinity have thus been included in the air quality analysis of potential impacts to the ambient air quality based on traffic, which determined that cumulative CO impacts would not be significant.

7.10 Greenhouse Gas Emissions

Global climate change is, by its nature, a cumulative issue. The project would generate a total of 2,844 $MTCO_2E$ of GHG emissions annually with incorporation of GHG-reducing design features. The project therefore exceeds the City's interim 900 $MTCO_2E$ GHG screening criterion that identifies when a project must perform further analysis to show a 28.3 percent reduction in BAU emissions.

As analyzed in Section 4.10, Greenhouse Gas Emissions, the project reduction of 1,132 $MTCO_2E$ based on GHG-reducing project design features would equate to a 28.5 percent reduction in GHG emissions. These reductions would result from the project's incorporation of various energy- and water-saving and waste reduction design features, the provision of shuttle services, energy emissions reductions achieved through RPS, and vehicle emissions reductions achieved through statewide regulations. Therefore, the project would exceed the City's goal of achieving a 28.3 percent reduction relative to BAU 2020. The level of impacts associated with the project's contribution of GHGs to cumulative statewide emissions would therefore be less than considerable.

By implementing green building design, the project would be consistent with the overall goals and strategies of all relevant local and state plans, policies, and regulations aimed at reducing GHG emissions from land development. Therefore, the contribution of the project to the cumulative effect on global climate change would be less than considerable.

7.11 Public Services and Facilities

As discussed in Section 4.11, Public Services and Facilities, implementation of the project would result in an incremental increase in demand for public services, including fire, police, parks, and libraries. The project would increase the residential population and thereby result in higher use of fire protection/emergency medical services, police protection, parks/recreational facilities, and libraries that serve the project area. Cumulative projects would also contribute to the demand of public services and facilities. However, these projects as well as the proposed project would be required to pay FBA fees which would ensure that public facilities are phased according to the level of development in the community. Additionally, the project would be adequately served by police and fire protection services, and does not require new or expanded facilities to serve the site which would cause physical environmental impacts. Therefore, the project would not contribute to cumulative significant impacts relative to fire protection/emergency medical services, police protection, parks/recreational facilities, libraries, and schools, and impacts would be less than significant.

7.12 Utilities

7.12.1 Water Supply

The project's anticipated water demand is 92,350 gpd, or 103.4 AFY. Cumulative impacts could occur if the project's water demand in combination with other cumulative projects would exceed the planned water supply availability for the planning horizon, resulting in the need to construct new water facilities that could have significant impacts on the environment. Pursuant to the City's Water Supply Assessment (2014), the water demand projections for the project are included in the regional water resource planning documents of the Water Authority, MWD, and partially in the City's 2010 UWMP. These plans identify current and future water supplies that would be adequate to serve the projected needs of the project, as well as regional water needs. In addition, the Water Authority tracks projects that utilize the accelerated forecasted growth demand increment to ensure that all forecasted growth is accounted for and that future UWMP updates include identified projects. As no new or expanded sources of water supply would need to be developed to meet regional demands, and no new facilities would need to be constructed, the project would not contribute to a significant cumulative impact. .

7.12.2 Water Systems

Cumulative impacts may result from water demand that exceeds pertinent requirements. As detailed in Section 4.12, Utilities, the project's water conservation design features would help in reduction of the anticipated demand of the project and further ensure that the existing water system would have the capacity to serve the project. Cumulative projects would be required to adhere to the City Water Department Facility Design Guidelines and, therefore, in combination

with reasonably foreseeable projects, would not contribute to a significant cumulative impact related to water systems.

7.12.3 Wastewater Systems

The project would generate an average flow of 80,720 gpd and a peak flow of 201,800 gpd. This sewage would be added to the approximately 180 mgpd of wastewater currently processed by the Metropolitan Sewerage System. The Point Loma Wastewater Treatment Facility has excess capacities of 65 mgpd. As discussed in Section 4.12, Utilities, this treatment facility has sufficient capacity for the project. Cumulative projects would be required to demonstrate that adequate wastewater capacity can be provided. As such, the project, in combination with other reasonably foreseeable projects, would not contribute to a significant cumulative impact related to wastewater.

7.12.4 Solid Waste

According to the City's CEQA Significance Determination Thresholds (City of San Diego 2011), cumulative impacts to solid waste facilities would be significant if the project includes the construction, demolition, and/or renovation of 40,000 square feet or more of building space. Additionally, cumulative impacts are mitigated by the implementation of a project-specific WMP, which reduces solid waste impacts to below a level of significance. The project meets the City's 40,000-square-foot threshold. A WMP for the project has been prepared (Appendix N). Implementation of the WMP would ensure that the project would reduce construction- and demolition-related waste by a minimum of 75 percent (in accordance with AB 341) , and would implement waste reduction measures during the occupancy phase of the project. The measures identified in the WMP, when implemented, would ensure that potential impacts to solid waste management facilities, including landfills, materials recovery facilities and transfer stations, and services, including collection, would be below a level of significance. Some of the projects in the cumulative project list would contribute to solid waste and impact landfill capacity waste management facilities and waste management services. However, these projects would each be required to prepare a WMP and comply with City ordinances. Therefore, the project would not contribute to a cumulatively significant impact, and impacts would be less than significant.

7.13 Energy Conservation

Development of the project would generate additional demand for electricity and natural gas. Together with other cumulative projects, there is a potential for significant impacts to energy supplies. As described in Section 4.13, Energy Conservation, the project incorporates several sustainable site design elements to ensure that it does not result in the consumption of excessive amounts of energy. As such, the project's contribution to energy demands would not be cumulatively considerable. Sustainable design that would be incorporated into the project to reduce the project's overall demand for energy is identified in Section 4.13.3.3. The combination

of sustainable building techniques and energy efficiency practices would reduce the overall energy demand of the project. Other features of the project may additionally serve to reduce VMT and associated fuel consumption. The project site location, within an already urbanized area adjacent to existing and planned public transit service, offers opportunity for transit use and reduced VMT. The provision of shuttle, van, and car services would reduce vehicle trips associated with the project. Pedestrian walkways have also been incorporated into the project design to provide connections between on-site and off-site uses. These measures would reduce the project's contribution to cumulative energy impacts to below a level of significant.

7.14 Geology and Soils

The project, as all other projects in the vicinity, would follow standard construction practices and engineering codes to ensure that no geologic impacts would result from project development. The project includes additional engineering measures beyond the standard California Building Code and City grading requirements, as identified in the project's geotechnical report, to reduce hazards to below a level of significance.

Potential impacts to future development of other projects would be similarly reduced to below a level of significance through implementation of remedial measures identified in project geotechnical investigations, which are required by the City's Grading Regulation for all new development within the City. In addition, conformance to building construction standards for seismic safety with the Uniform Building Code would assure that new structures would be able to withstand anticipated seismic events within the City. Therefore, implementation of the project and associated future development in the subregion would not contribute to cumulative impacts related to geology and soils. Geology and soils are discussed further in Section 8.1, Effects Found Not to be Significant.

7.15 Hydrology

The project would not substantially or adversely impact existing drainage patterns, increase runoff, or create flood hazards on-site or downstream. No encroachment for the project is proposed within the 100-year floodplain. The standard engineering practices and BMPs of the project have been designed to preclude potential hydrology impacts, including those resulting from drainage into Carroll Canyon Creek. The project would therefore not contribute to any cumulative hydrologic effects in the project area. Other projects would be similarly mandated to adhere to state and local engineering requirements and regulations. Hydrology is discussed further in Section 8.2, Effects Found Not to be Significant.

7.16 Water Quality

The project would comply with all applicable federal, state, and local water quality standards through adherence to the City's Storm Water Standards. The project design incorporates features to reduce pollutant discharge off-site, thus avoiding significant adverse water quality impacts to the project's receiving waters, the Peñasquitos Lagoon, a 303(d) impaired receiving water body. As a result of the installation of water quality measures and BMPs that are not currently present on-site, the project would not have a significant adverse impact on water quality of runoff leaving the site. Through the proposed use of BMPs, implementation of the project would result in water quality impacts that would be improved over the existing condition.

Future projects would also be required to implement these mandated water quality protection measures, and through adherence to the City's NPDES permit, SUSMP, and Storm Water Standards Manual, would prepare project-specific storm water pollution prevention plans and implement practices that would preclude significant water quality impacts. Implementation of these requirements would avoid potentially significant cumulative impacts. Water quality is discussed further in Section 8.3, Effects Found Not to be Significant.

8.0 Effects Found Not to be Significant

Pursuant to CEQA Guidelines Section 15128, this section briefly describes the environmental issue areas that were determined during preliminary project review not to be significant, and are therefore not discussed in detail in the EIR.

8.1 Geology and Soils

Leighton and Associates, Inc. conducted a comprehensive geotechnical investigation of the project site. The Geotechnical Investigation, dated October 31, 2012, is included as Appendix H of this EIR.

The project site is located in the Peninsular Ranges Geomorphic Province of southwestern California. This province is characterized by southeast-northwest trending ranges and fault zones. Most of the coastal region within this area, including the project site, is underlain by sedimentary rock which is subject to erosion.

The project site is located within Geologic Hazard Categories 32, 52, and 53, as shown on the City's Seismic Safety Study maps. Category 32 is characterized by a low potential for liquefaction, fluctuating groundwater, and minor drainages. Category 52 is characterized by other level areas, gently sloping to steep terrain with favorable geologic structure and low risk of geologic hazards. Category 53 is characterized as level or sloping terrain, unfavorable geologic structure, and a low to moderate risk of geologic hazards. The project site is located in a seismically active region characterized by occasional damaging earthquakes. Geologic impacts associated with earthquakes can be classified as fault-rupture, ground shaking, and secondary effects such as soil liquefaction and slope instability. The potential of a surface fault-rupture or landslides are low. A low liquefaction risk exists for alluvial soils in the northwestern portion of the site in Carroll Canyon.

Overall, the project site contains geologic units and soils that are suitable for development with the exception of localized undocumented fill and alluvium. Soils on-site may be subject to liquefaction, hydrocollapse, expansion, and compression.

Grading and development of the project would be regulated by the California Uniform Building Code (UBC), as well as the City Municipal Code which requires conformance with recommendations provided in the geotechnical investigation for the project.

The City Municipal Code's Grading Regulations require extensive measures to control erosion during and after grading or construction. Conformance with such mandated City grading requirements would ensure that proposed grading and construction operations would avoid significant soil erosion impacts. In addition, grading will follow recommendations described in the geotechnical investigation to avoid potential soil erosion impacts.

Alluvial soils and undocumented fills located within or adjacent to construction areas would be removed and replaced with properly engineered fill prior to project construction in accordance with the geotechnical investigation. To avoid potential groundwater accumulation issues, the project would include subdrains at the base of removals and at the base of cut and fill slopes in accordance with the geotechnical investigation. Potential impacts of earthquake shaking on the proposed structures would be reduced to an acceptable level by design and construction in accordance with prevailing building codes, as discussed in the geotechnical investigation. The project would comply with the recommendations contained in the geotechnical investigation as well as applicable building and grading regulations to ensure that no impacts from geologic conditions would result with project implementation.

As discussed previously, the 100-year floodplain of the Carroll Canyon drainage extends onto the northwestern portion of the project site. The project proposes grading embankments and a detention basin within the existing 100-year floodplain. The project would comply with compaction and development requirements contained in Section 143.0145, Development Regulations for Special Flood Hazard Areas, of the City's Municipal Code.

In summary, compliance with state and City regulations and the geotechnical investigation recommendations would ensure that impacts due to geologic conditions, soil erosion, and earthquakes would be less than significant.

8.2 Hydrology

A drainage study for the project was prepared by Latitude 33 Planning and Engineering (2014). This technical report is included in its entirety as Appendix P of this EIR. Additionally, a floodplain analysis was prepared by Tory R. Walker Engineering, Inc., and is included as Appendix Q of this EIR.

The project site lies within seven drainage basins, which total 102 acres. The majority of the site drains north-westerly towards Pomerado Road and I-15. In the existing condition, sheet runoff is directed through several natural earthen drainage swales and discharges into an existing natural drainage channel adjacent to Pomerado Road. Runoff is further directed and channelized under Scripps Ranch Row and Avenue of Nations towards Miramar Road via a box culvert drainage system. Table 8-1 provides a summary of existing peak flow estimates.

TABLE 8-1
EXISTING PEAK FLOW RATES (100-YEAR STORM EVENT)

Basin	Area (acres)	50-Year (cfs)
E.1	35.85	43.6
E.2	11.18	15.6
E.3	8.41	12.1
E.4	4.15	5.7
E.5	6.75	9.1
E.6	3.24	5.0
E.7	32.71	45.6
Total Watershed Area	102.3	
Total Flow		136.7
Total Flow (plus off-site)		1,349.7

cfs=cubic feet per second

The 100-year floodplain of the Carroll Canyon drainage extends onto the northern portion of the project site. The site is not located downstream from a dam or dam inundation area, and the potential for a tsunami or seiche to affect the project site is very low due to the distance and elevation of the site with respect to the Pacific Ocean and other water bodies.

The project has been designed to ensure runoff rates are controlled to existing condition levels and that drainage patterns are maintained. With the implementation of the project, the site would be divided into four basins (Basins A to D). The project would include private storm drain facilities that would collect runoff and outlet it into the existing natural drainage creek adjacent to Pomerado Road. On-site runoff would be collected in private storm drain facilities that would route to water quality and hydromodification program compliant basins prior to discharging into the existing natural drainage creek adjacent to Pomerado Road. In addition, off-site flows from the southeast would be collected in a storm drain system, which would pass through the project site and around the proposed treatment basins. This is referred to as a bypass system, and no on-site project flows would be introduced to the off-site flows. Overall, the project would slightly reduce the total flow from 1,349.7 to 1,343.0 cubic feet per second (cfs), as shown in Table 8-2.

TABLE 8-2
PROJECT PEAK FLOW RATES (100-YEAR STORM EVENT)

Basin	Area (acres)	50-Year (cfs)
Bypass System		
P.1	29.76	41.5
Basin A		
P.2	6.59	9.1
Basin B		
P.6	13.37	29.9
Basin C		
P.3	9.67	13.9
P.4	17.41	40.2
P.5	3.12	4.8
Total	30.20	58.87
Basin D		
P.7	22.33	32.2
Total Watershed Area	102.3	
Total Flow		130.0
Total Flow (plus off-site)		1,343.0

The project would match or decrease the current flow rates at the discharge locations by attenuating the 50-year storm event via detention basins. The locations of the discharge points would remain the same. A bypass storm drain system would convey the majority of off-site flows through the project site and around the proposed detention area.

As discussed previously, the 100-year floodplain of the Carroll Canyon creek extends onto the northern portion of the project site. The project proposes grading embankments and a detention basin within the existing 100-year floodplain. On-site peak flows would be reduced by the proposed detention basin such that there is no anticipated change in peak 100 year flows within the adjacent creek. A floodplain analysis was created to determine impacts of the proposed grading within the 100-year floodplain of Carroll Canyon Creek. The study limits begin approximately 100 feet downstream of the westerly property boundary and extend just upstream of Chabad Center Driveway. The ACOE HEC-RAS program was used to analyze the existing and proposed conditions. The resultant 100-year water surface elevations of Carroll Canyon Creek would not exceed one foot when compared to the existing condition. All increases in water surface elevations would be within the project site. Also, there would be no change in base flood elevations at both the upstream downstream limits of the HEC-RAS model. The floodplain analysis concludes that the proposed detention basin would not be affected by the 100-year flooding in the creek. No structures would be inundated or affected by flood waters due to the project.

There would be no adverse drainage effects due to project development, as the estimated peak flows would effectively be the same when comparing total pre/post construction peak flows. With the basin attenuation, there would be no net increase.

The proposed detention basins would be designed to reduce the potential for flooding/surcharging of the property north of the project adjacent to Pomerado Road. Thus, the project would not cause significant flooding impacts on-site or to upstream or downstream properties.

It should be noted that the project has not received a Condition Letter of Map Revision (CLOMR) to remap the floodplain shown on Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) Panel 06073C1364G. The project is currently processing a CLOMR with FEMA and will not receive grading permits until the CLOMR is approved. See Figure 8-1 for the existing FEMA zone AE floodplain and the anticipated revised zone AE floodplain once the CLOMR is approved by FEMA.

8.3 Water Quality

A water quality technical report for the project was prepared by Latitude 33 Planning and Engineering (2015). The water quality technical report evaluates potential water quality impacts to downstream waters and prescribes measures which would be incorporated into the project to reduce those impacts. This technical report is included as Appendix R.

Water quality may be affected by sedimentation caused by erosion, runoff carrying contaminants, and direct discharge of pollutants. Land development generally leads to increased opportunity for contaminated runoff that carries oil, heavy metals, pesticides, fertilizers, and other contaminants to enter a watershed. Primary pollutants of concern are those that correspond with any Clean Water Act 303(d) designation for the receiving waters and the anticipated pollutants generated from the project. This project's receiving waters, the Los Peñasquitos Lagoon, is impaired for sedimentation and siltation.

To meet the City's water quality requirements, the project design incorporates a combination of water quality measures to reduce pollutant discharge into the Los Peñasquitos Lagoon. Two basins are proposed for storm drain detention and would also function for water quality treatment and HMP compliance. In addition to the basins, localized bioretention areas would be designed to control runoff rates to meet HMP requirements. Bio-retention basins would be used in conjunction with other BMPs (i.e., bio-swales and bio-retention basins) to address the City's latest HMP requirements.

The total improvements would provide new public storm water improvements, and convey flows through multiple forms of treatment and infiltration measures. Bio-swales and inlets would be designed to treat the water quality flow and sized to accommodate the peak flow. Bioretention basins for hydromodification BMPs would be sized and configured to provide treatment for water quality issues. The basins would have a high treatment category for sediment which is a pollutant of concern for the downstream receiving water.

As a result of the installation of water quality measures and BMPs that are not currently present on-site, the project would improve the quality of runoff leaving the site. The project would

incorporate construction BMPs, standard low impact development (LID) BMPs, source control BMPs, treatment control BMPs, and a storm water BMPs maintenance agreement. These are discussed in detail in the water quality technical report.

Pursuant to the Construction General Permit, a full Storm Water Pollution Prevention Plan for Construction Activities (SWPPP) will be developed for the project. A SWPPP and erosion control plans would be prepared as part of the grading permit phase of the project.

The project would comply with all applicable federal, state, and local water quality standards through adherence to the City's Storm Water Standards. With implementation of the proposed BMPs, the project would not have a significant effect on water quality.

8.4 Agricultural Resources

The project site does not contain prime agricultural soils or farmlands as designated by the California Department of Conservation. The project site is not subject to, nor near, a Williamson Act contract parcel. Therefore, project development would have no effect on agricultural resources.

8.5 Mineral Resources

Most of the project site is located within Mineral Resource Zone-2, as identified in the General Plan's generalized mineral land classification map (General Plan, Figure CE-6). Mineral Resource Zone 2 indicates high likelihood for the presence of significant mineral deposits. While the project would potentially impact mineral resources within this development area and prevent mining of the remaining area on-site through preservation as biological open space, the mining area would already be restricted or prohibited due to the adjacent land uses, existing MHPA designation, land use designation, and zoning. Thus, the project impact to mineral resources would be less than significant.

Map Source: Tory R. Walker Engineering, Inc.

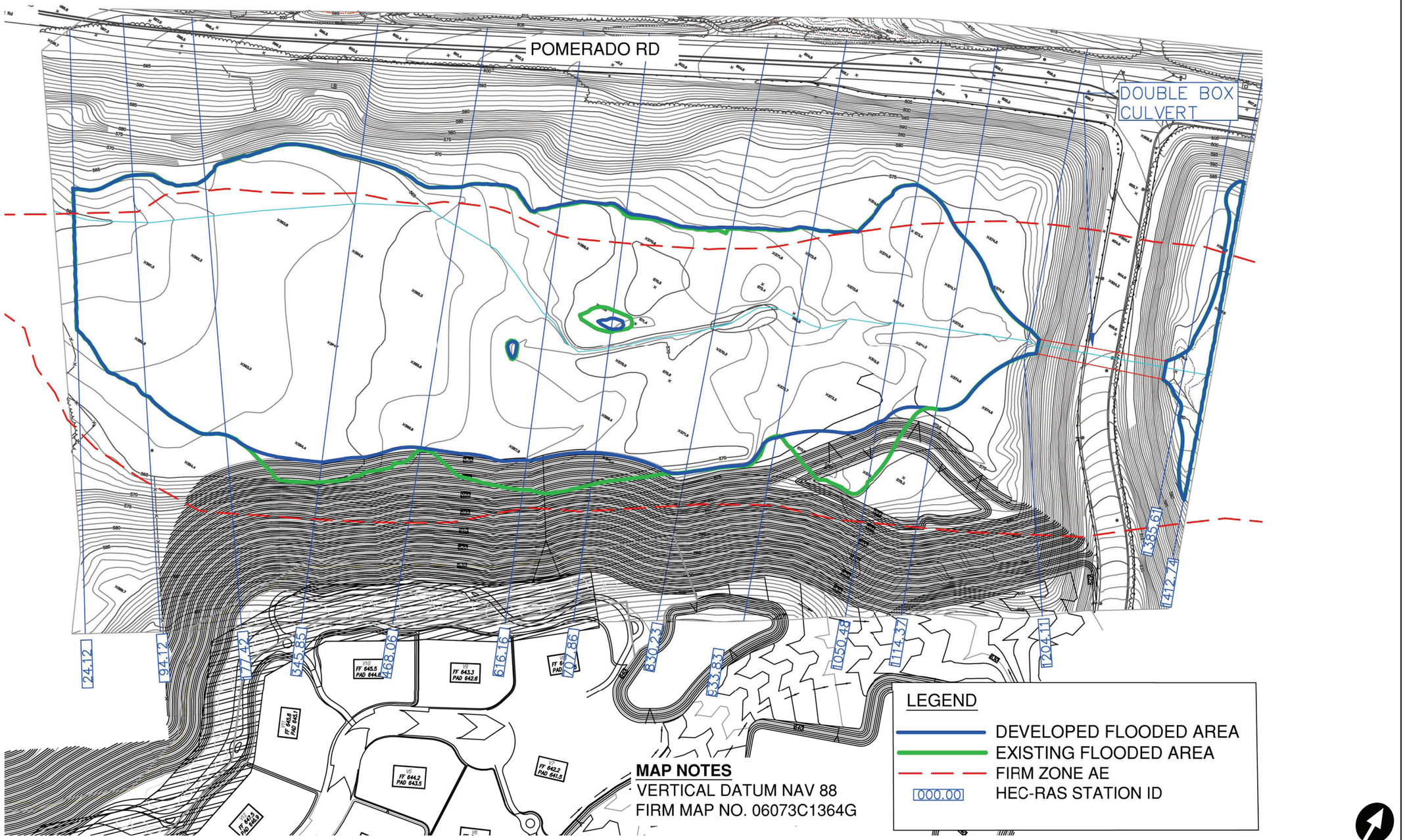

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FIGURE 8-1

Existing and Developed Floodplain Conditions

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9.0 Project Alternatives

In order to fully evaluate the environmental effects of projects, CEQA mandates that alternatives to the project be analyzed. Section 15126.6 of the State CEQA Guidelines requires the discussion of "a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project" and the evaluation of the comparative merits of the alternatives. The alternatives discussion is intended to "focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project," even if these alternatives would impede to some degree the attainment of the project objectives.

As discussed in Section 4.0, the project could result in significant, direct, and/or cumulative environmental impacts related to land use, transportation, biological resources, noise, historical resources, paleontological resources, and fire protection services. Mitigation measures have been identified that would reduce all direct and cumulative impacts to below a level of significance, with the exception of traffic and traffic-related land use impacts. In developing the alternatives to be addressed in this section, consideration was given to their ability to meet the basic objectives of the project and eliminate or substantially reduce significant environmental impacts. As identified in Section 3.0, project objectives include the following:

- Build and operate a California State licensed continuing care retirement community (CCRC) providing a full continuum of care and services with sufficient scale to be economically viable while located within a larger community.

- Provide progressive care and a range of services to allow seniors to remain within the community.

- Provide housing for seniors with convenient access to medical care facilities, transportation, retail, and recreational amenities.

The alternatives identified in this section are intended to further reduce or avoid significant environmental effects of the project. The EIR addresses Alternatives Considered but Rejected, Alternative Consistent with CUP 133-PC, No Project (No Development) Alternative, and Reduced Grading/Development Alternative. Each major issue area included in the impact analysis of this EIR has been given consideration in the alternatives analyses, and impacts are summarized in Table 9-1.

TABLE 9-1
COMPARISON OF PROJECT AND ALTERNATIVES IMPACTS SUMMARY

Environmental Issue Area	Project	No Project (No Development) Alternative	No Project – Alternative Consistent with Approved CUP	Reduced Grading/Development Alternative
Land Use				
General and Community Plan Consistency	Significant and unmitigated	Less than significant (Less than the project)	Significant and unmitigated (Greater than the project)	Significant and unmitigated (Less than the project)
LDC Compliance	Less than significant	Less than significant (Less than the project)	Less than significant (Greater than the project)	Less than significant (Same as the project)
MSCP/MHPA Consistency	Significant and mitigated	Less than significant (Less than the project)	Significant and mitigated (Greater than the project)	Significant and mitigated (Same as the project)
MCAS Miramar ALUCP Compatibility	Less than significant	Less than significant (Less than the project)	Less than significant (Same as the project)	Less than significant (Same as the project)
General Plan Noise/Land Use Compatibility	Less than significant	Less than significant (Less than the project)	Less than significant (Greater than the project)	Less than significant (Same as the project)
Aircraft Noise Compatibility	Less than significant	Less than significant (Less than the project)	Less than significant (Same as the project)	Less than significant (Same as the project)
Traffic Circulation				
Traffic Capacity	Significant and unmitigated	No impact	Significant and unmitigated (Greater than the project)	Significant and unmitigated (Less than the project)
Traffic Generation	Less than significant	No impact	Less than significant (Greater than the project)	Less than significant (Less than the project)
Freeways, Interchanges, and Ramps	Less than significant	No impact	Less than significant (Greater than the project)	Less than significant (Less than the project)
Transportation Systems	Less than significant	No impact	Less than significant (Greater than the project)	Less than significant (Less than the project)
Traffic Hazards	Less than significant	No impact	Less than significant (Greater than the project)	Less than significant (Less than the project)
Biological Resources				
Sensitive Species	Significant and mitigated	Less than significant (Less than the project)	Significant and mitigated (Greater than the project)	Significant and mitigated (Same as the project)
Sensitive Habitats	Significant and mitigated	Less than significant (Less than the project)	Significant and mitigated (Greater than the project)	Significant and mitigated (Less than the project)
Jurisdictional Wetlands and Waters	Significant and mitigated	Less than significant (Less than the project)	Significant and mitigated (Greater than the project)	Significant and mitigated (Same as the project)
Wildlife Corridors	Less than significant	Less than significant (Less than the project)	Less than significant (Greater than the project)	Less than significant (Less than the project)

TABLE 9-1
COMPARISON OF PROJECT AND ALTERNATIVES IMPACTS SUMMARY
(continued)

Environmental Issue Area	Project	No Project (No Development) Alternative	No Project – Alternative Consistent with Approved CUP	Reduced Grading/Development Alternative
MHPA Boundary Line Adjustment Equivalency	Less than significant	Less than significant (Same as the project)	Significant and mitigated (Greater than the project)	Less than significant (Same as the project)
MHPA Land Use Adjacency	Significant and mitigated	Less than significant (Less than the project)	Less than significant (Greater than the project)	Significant and mitigated (Same as the project)
Invasive Species	Less than significant	Less than significant (Same as the project)	Less than significant (Same as the project)	Less than significant (Same as the project)
Noise				
Ambient Noise Level Increase	Less than significant	Less than significant (Less than the project)	Less than significant (Greater than the project)	Less than significant (Less than the project)
Noise Exposure	Less than significant	Less than significant (Less than the project)	Less than significant (Greater than the project)	Significant and mitigated (Same as the project)
Historical Resources				
Prehistoric/Historic Resources	Significant and mitigated	Less than significant (Less than the project)	Significant and mitigated (Greater than the project)	Significant and mitigated (Less than the project)
Religious/Sacred Uses	Less than significant	Less than significant (Less than the project)	Less than significant (Greater than the project)	Less than significant (Less than the project)
Paleontological Resources				
High Resource Potential	Significant and mitigated	Less than significant (Less than the project)	Significant and mitigated (Greater than the project)	Significant and mitigated (Less than the project)
Moderate Resource Potential	Less than significant	Less than significant (Same as the project)	Less than significant (Greater than the project)	Less than significant (Less than the project)
Visual Effects/Neighborhood Character/Landform Alteration				
Public View	Less than significant	Less than significant (Less than the project)	Less than significant (Greater than the project)	Less than significant (Less than the project)
Aesthetics	Less than significant	Less than significant (Less than the project)	Less than significant (Greater than the project)	Less than significant (Same as the project)
Bulk and Scale	Less than significant	Less than significant (Less than the project)	Less than significant (Greater than the project)	Less than significant (Less than the project)
Neighborhood Character	Less than significant	Less than significant (Less than the project)	Less than significant (Greater than the project)	Less than significant (Less than the project)
Landform Alteration	Less than significant	Less than significant (Less than the project)	Less than significant (Greater than the project)	Less than significant (Less than the project)

TABLE 9-1
COMPARISON OF PROJECT AND ALTERNATIVES IMPACTS SUMMARY
(continued)

Environmental Issue Area	Project	No Project (No Development) Alternative	No Project – Alternative Consistent with Approved CUP	Reduced Grading/Development Alternative
Public Health and Safety/Hazardous Materials				
Hazardous Materials	Less than significant	Less than significant (Less than the project)	Less than significant (Same as the project)	Less than significant (Same as the project)
Hazardous Material Sites	Less than significant	Less than significant (Less than the project)	Less than significant (Same as the project)	Less than significant (Same as the project)
Emergency Plans	Less than significant	Less than significant (Less than the project)	Less than significant (Same as the project)	Less than significant (Less than the project)
Wildland Fires	Less than significant	Less than significant (Less than the project)	Less than significant (Same as the project)	Less than significant (Same as the project)
Air Quality				
Air Quality Plan Implementation	Less than significant	Less than significant (Less than the project)	Less than significant (Greater than the project)	Less than significant (Less than the project)
Air Quality Violations	Less than significant	Less than significant (Less than the project)	Less than significant (Greater than the project)	Less than significant (Less than the project)
Particulate Matter	Less than significant	Less than significant (Less than the project)	Less than significant (Greater than the project)	Less than significant (Less than the project)
Greenhouse Gas Emissions				
GHG Emissions	Less than significant	Less than significant (Less than the project)	Less than significant (Greater than the project)	Less than significant (Less than the project)
Consistency with Plans, Policies, and Regulations	Less than significant	Less than significant (Less than the project)	Less than significant (Greater than the project)	Less than significant (Less than the project)
Public Services				
Public Services	Less than significant	Less than significant (Less than the project)	Less than significant (Greater than the project)	Less than significant (Less than the project)
Utilities				
Utilities	Less than significant	Less than significant (Less than the project)	Less than significant (Greater than the project)	Less than significant (Same as the project)
Water Supply	Less than significant	Less than significant (Less than the project)	Less than significant (Greater than the project)	Less than significant (Less than the project)
Landscaping	Less than significant	Less than significant (Less than the project)	Less than significant (Same as the project)	Less than significant (Same as the project)

TABLE 9-1
COMPARISON OF PROJECT AND ALTERNATIVES IMPACTS SUMMARY
(continued)

Environmental Issue Area	Project	No Project (No Development) Alternative	No Project – Alternative Consistent with Approved CUP	Reduced Grading/Development Alternative
Energy Conservation				
Electricity Use	Less than significant	Less than significant (Less than the project)	Less than significant (Greater than the project)	Less than significant (Less than the project)
Fuel and Other Energy Use	Less than significant	Less than significant (Less than the project)	Less than significant (Greater than the project)	Less than significant (Less than the project)
Geology and Soils				
Geology and Soils	Less than significant	Less than significant (Less than the project)	Less than significant (Same as the project)	Less than significant (Same as the project)
Hydrology				
Hydrology	Less than significant	Less than significant (Greater than the project)	Less than significant (Greater than the project)	Less than significant (Same as the project)
Water Quality				
Water Quality	Less than significant	Less than significant (Greater than the project)	Less than significant (Greater than the project)	Less than significant (Same as the project)

As required under Section 15126.6 (e) (2) of the CEQA Guidelines, the EIR must identify the environmentally superior alternative. Pursuant to the CEQA Guidelines, if the No Project Alternative is determined to be the most environmentally superior project, then another alternative among the alternatives evaluated must be identified as the environmentally superior project. Section 9.5 addresses the Environmentally Superior Alternative.

9.1 Alternatives Considered but Rejected

This subsection of the EIR is provided consistent with CEQA Guidelines, which state that the EIR need examine in detail only a reasonable range of alternatives that the lead agency determines could feasibly attain most of the basic objectives of the project. Further, the EIR should identify any alternatives that were considered by the lead agency but were rejected and briefly explain the reasons underlying the lead agency's determination. Among factors used to eliminate alternatives from detailed consideration in the EIR is failure to meet most of the basic project objectives or inability to avoid significant environmental effects (Guidelines 15126.6(c)). Consistent with the requirement to address a "reasonable range" of alternatives, another consideration for excluding an alternative from further study includes similarity to other alternatives that are addressed in detail.

9.1.1 Alternative Access Route Alternative

The Alternate Access Route Alternative was considered by the City. Under this alternative, an alternate route would provide access to the project site and would keep project trips off of Pomerado Road in an effort to avoid significant and unavoidable impacts due to congestion along this primary community corridor. This alternative was rejected because it was also determined that there were no other reasonable access routes. Pomerado Road is the only major roadway providing access in the immediate vicinity of the project. The project site is bounded by MCAS Miramar to the south, and due to federal ownership, no access would be granted through this property. Alternately, since Pomerado Road provides a direct link between I-15 and Alliant International University, access via Avenue of Nations would not eliminate project traffic on Pomerado Road. Additionally, it would add traffic through Marshall Middle School and Alliant International University. Thus, this alternative was not considered for further analysis.

9.1.2 Alternate Location Alternative

According to the CEQA Guidelines (Section 15126.6) (f) (2) (A):

> The key question and first step in (alternative location) analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or

substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR.

As analyzed in Section 4.0, the project would result in significant and unmitigated land use and traffic impacts due to the increase in traffic on Pomerado Road. Therefore, an alternate location which does not add traffic on Pomerado Road is considered in this section.

A number of factors must be considered for selecting an appropriate location for the project. The project requires at least 35 acres that would support a campus setting and allow three- and four-story buildings. It would need to be located in close proximity to persons of a qualified age and income level, hospitals, doctors, pharmacies, and shopping. There is also need for access to public utilities including water and wastewater facilities, and electrical and natural gas services.

The project site would support the proposed development and is located in close proximity to qualified residents, health care services, and commercial areas. During the project planning process, the applicant actively searched for available properties with the assistance of a land brokerage, and were outbid to other offers on all possibilities. Other sites of adequate size and in locations that can serve all areas of the City were not available. There are no other sites in the SMRCP area or adjoining communities that are within the applicant's control and would support the project needs.

Moving the project to an alternate site would not necessarily avoid or substantially lessen the project's impacts. Traffic impacts from development of an alternate site could also have the potential to impact circulation segments, intersections, and freeways. A similar level of development would have the same impacts relative to air quality, GHG emissions, public services and facilities, public utilities, energy geology and soils, hydrology, and water quality. Depending on the alternate site location, when compared to the project, increased impacts relative to biological resources, noise, historical resources, paleontological resources, visual quality, and hazardous materials could occur.

9.1.3 Skilled Nursing Building Alternative

The Skilled Nursing Building Alternative was considered in order to eliminate traffic impacts to Pomerado Road. Under this alternative, only the 60-bed skilled nursing building component of the project would be constructed. There would be no assisted living units, acute assisted living units, common/recreation building, or other project amenities. This alternative would generate 180 ADT. Tables 9-2, 9-3, and 9-4 summarize the existing, near-term, and year 2030 with and without the Skilled Nursing Building Alternative street segment impacts. As shown, Pomerado Road would continue to operate at LOS F; however, the addition of project traffic would not result in an increase in volume to capacity ratio more than 0.01, which is the City's threshold for determining if a project would result in a significant impact to roadway segments operating at LOS F. Thus, under this alternative, traffic impacts would be less than significant.

TABLE 9-2
SKILLED NURSING BUILDING ALTERNATIVE
EXISTING WITH AND WITHOUT PROJECT STREET SEGMENT OPERATIONS

Road	Segment	Class.	Existing			Existing + Project			ΔV/C	*Sig. Impact?*
			LOS	Volume	V/C	LOS	Volume	V/C		
Miramar Road	I-15 SB Ramps to I-15 NB Ramps	PA	C	41,208	0.69	C	41,327	0.69	0.002	*NO*
Pomerado Road	I-15 NB Ramps to Willow Creek Road	2-Ca	F	27,827	1.86	F	27,957	1.86	0.009	*NO*
	Willow Creek Road to Scripps Ranch Boulevard	2-Ca	F	22,038	1.47	F	22,169	1.48	0.009	*NO*
	Scripps Ranch Boulevard to Chabad Center Driveway	2-Ca	F	22,199	1.48	F	22,343	1.49	0.010	*NO*
	Chabad Center Driveway to Avenida Magnifica	2-Ca	F	21,847	1.46	F	21,883	1.46	0.002	*NO*

TABLE 9-3
SKILLED NURSING BUILDING ALTERNATIVE
NEAR-TERM WITH AND WITHOUT PROJECT STREET SEGMENT OPERATIONS

Road	Segment	Class.	Near-term			Near-term + Project			ΔV/C	*Sig. Impact?*
			LOS	Volume	V/C	LOS	Volume	V/C		
Miramar Road	I-15 SB Ramps to I-15 NB Ramps	PA	C	41,723	0.70	C	41,842	0.70	0.002	*NO*
Pomerado Road	I-15 NB Ramps to Willow Creek Road	2-Ca	F	27,938	1.86	F	28,068	1.87	0.009	*NO*
	Willow Creek Road to Scripps Ranch Boulevard	2-Ca	F	22,119	1.47	F	22,250	1.48	0.009	*NO*
	Scripps Ranch Boulevard to Chabad Center Driveway	2-Ca	F	22,260	1.48	F	22,404	1.49	0.010	*NO*
	Chabad Center Driveway to Avenida Magnifica	2-Ca	F	21,908	1.46	F	21,944	1.46	0.002	*NO*

TABLE 9-4
SKILLED NURSING BUILDING ALTERNATIVE
YEAR 2030 WITH AND WITHOUT PROJECT STREET SEGMENT OPERATIONS

Road	Segment	Class.	Near-term			Near-term + Project			ΔV/C	*Sig. Impact?*
			LOS	Volume	V/C	LOS	Volume	V/C		
Miramar Road	I-15 SB Ramps to I-15 NB Ramps	PA	C	45,000	0.75	C	45,119	0.075	0.002	*NO*
Pomerado Road	I-15 NB Ramps to Willow Creek Road	2-Ca	F	36,000	2.40	F	36,130	2.41	0.009	*NO*
	Willow Creek Road to Scripps Ranch Boulevard	2-Ca	F	30,000	2.00	F	30,131	2.01	0.009	*NO*
	Scripps Ranch Boulevard to Chabad Center Driveway	2-Ca	F	28,000	1.87	F	28,144	1.88	0.010	*NO*
	Chabad Center Driveway to Avenida Magnifica	2-Ca	F	28,000	1.87	F	28,036	1.87	0.002	*NO*

Legend:
Class. = Functional Class
LOS = Level of Service
V/C = Volume to Capacity Ratio
ΔV/C = Change in V/C Ratio
PA = 6-lane Prime Arterial
2-Ca = 2-lane Collector with painted median/turn lane

By significantly reducing the development footprint and grading, and preserving more undisturbed open space, project-related impacts associated with visual quality/neighborhood character/landform alteration, biological resources, historical resources, and paleontological resources would be accordingly reduced when compared to the project. All other impacts under this alternative would be the same, but incrementally reduced, as compared to the project. However, this alternative was rejected because it would not meet any of the project objectives including the provision of assisted living units and a range in care and service within the project community. Thus, this alternative was not considered for further analysis.

9.2 No Project (No Development) Alternative

The following discussion of the No Project Alternative is based on the CEQA Guidelines Section 15126.6 (e) (3) (B) which states:

> If the project is other than a land use or regulatory plan, for example a development project on identifiable property, the no project alternative is the circumstance under which the project does not proceed. Here the discussion would compare the environmental effects of the property remaining in its existing state against environmental effects which would occur if the project is approved. If disapproval of the project under consideration would result in predictable actions by others, such as the proposal of some other project, this no project consequence should be discussed. In certain instances, the no project alternative means “no build” wherein the existing environmental setting is maintained. However, where failure to proceed with the project will not result in preservation of existing conditions, the analysis should identify the practical result of the project’s non-approval and not create and analyze a set of artificial assumptions that would be required to preserve existing physical environment.

Further, according to Section 15126.6 (e) (3) (C):

> After defining the no project alternative . . ., the lead agency should proceed to analyze the impacts of the no project alternative by projecting what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.

The No Project (No Development) Alternative would be maintaining the site in its current undeveloped condition and would be equivalent to the existing environmental setting.

A comparative analysis of the impacts associated with this alternative and the project is provided below.

9.2.1 Land Use

The No Project (No Development) Alternative would be consistent with the SMRCP in that it would retain the University designation and would eliminate the need for amending the SMRCP. Maintenance of the project site with the existing condition would not conflict with the General Plan, SMRCP, or other applicable land use plans. This alternative would reduce impacts associated with MHPA adjacency and eliminate the significant unmitigated secondary land use impact associated with traffic on Pomerado Road.

9.2.2 Traffic Circulation

Existing and projected traffic conditions would remain unchanged with the No Project (No Development) Alternative. Since this alternative would not result in additional traffic generation on Pomerado Road, significant unavoidable traffic impacts of the project would be avoided.

9.2.3 Biological Resources

Since there would be no construction activities with the No Project (No Development) Alternative, significant impacts associated with disruption of sensitive species and habitats and adjacency to the MHPA would not occur. The project's direct impacts would be mitigated through habitat, wetland, and non-wetland preservation/creation/restoration/ enhancement and an MHPA boundary line adjustment, and the potential for indirect impacts to biological resources in the adjacent MHPA would be mitigated to below a level of significance through adherence to the MHPA Land Use Adjacency Guidelines contained in the MSCP Subarea Plan. The No Project (No Development) Alternative would avoid direct and indirect impacts related to biological resources.

9.2.4 Noise

Noise impacts under the No Project (No Development) Alternative would be avoided. Under this alternative, maintenance of the existing condition would eliminate the potential for construction-related noise. The project would incrementally increase traffic on Pomerado Road and area roadways; however, exterior and interior noise levels would be less than the applicable City thresholds. The No Project (No Development) Alternative would result in no impacts related to project-generated traffic noise or operational noise.

9.2.5 Historical Resources

In the absence of grading for the No Project (No Development) Alternative, there would be no potential to uncover subsurface cultural resources. Any unknown buried resources would remain buried. The project requires mitigation during construction to reduce potential impacts. Therefore, impacts to historical resources would be avoided under the No Project (No Development) Alternative.

9.2.6 Paleontological Resources

In the absence of grading under the No Project (No Development) Alternative, there would be no potential to impact paleontological resources within any fossil-bearing formation on-site. Any unknown buried resources would remain buried. The project requires mitigation during construction to reduce potential impacts. Therefore, impacts to paleontological resources would be avoided under the No Project (No Development) Alternative.

9.2.7 Visual Quality/Neighborhood Character/Landform Alteration

In the absence of grading under the No Project (No Development) Alternative, grading of steep slopes would be avoided. The project would result in less than significant impacts related to public views, aesthetics, bulk and scale, neighborhood character, and landform alteration. The project would encroach into steep slopes; however, the project has been designed in accordance the Steep Hillside Guidelines and impacts associated with landform alteration would be less than significant. Under the No Project (No Development) Alternative, maintaining the site in its existing condition would result in no impact to visual quality/neighborhood character/landform.

9.2.8 Health and Safety/Hazardous Materials

Since the project site would remain open space, the potential for health and safety risks associated with the No Project (No Development) Alternative would have no effect on human health, public safety, and hazardous materials. However, as the project would not include uses that would involve hazardous materials and would implement a brush management program in accordance with City standards, impacts would also have less than significant effects.

9.2.9 Air Quality

Maintenance of the project site in its existing condition would eliminate short-term emissions associated with grading and construction activities and long-term emissions associated with mobile and area sources. Long-term emissions would be avoided under this alternative, as there would be no new trips generated and no new mobile source emissions generated compared to the project. Less than significant air quality impacts of the project would be avoided under the No Project (No Development) Alternative.

9.2.10 Greenhouse Gas Emissions

Maintenance of the project site in its existing condition would eliminate short-term GHG emissions associated with grading and construction activities and long-term GHG emissions associated with mobile and area sources. Less than significant GHG impacts of the project would be avoided under the No Project (No Development) Alternative.

9.2.11 Public Services and Facilities

The demand on public services would remain unchanged from the existing condition with the No Project (No Development) Alternative. There would be no additional demand for fire protection and emergency medical services, police protection, public recreational facilities and parks, and libraries. However, demand for a fire station would remain. Project impacts to public services and facilities would be less than significant.

9.2.12 Public Utilities

The No Project (No Development) Alternative would not affect existing water, wastewater, or solid waste facilities, as services would continue as they are today. This alternative would not generate construction and operational waste that would require disposal at the landfill. Project impacts to public utilities would be less than significant with mitigation.

9.2.13 Energy

The No Project (No Development) Alternative would not require electricity, natural gas, or fuel, and would have no impact on existing energy supplies or facilities. Project impacts to energy demand would be less than significant.

9.2.14 Geology and Soils

Geologic conditions at the project site would remain unchanged under the No Project (No Development) Alternative. According to the geotechnical investigation, the soils on-site may be subject to liquefaction, hydrocollapse, expansion, and compression. Under this alternative, corrective actions would not be taken, as no construction would take place. The project as proposed would be designed and constructed to reduce the potential for these geologic risks. Therefore, like the project, this alternative would have a less than significant impact.

9.2.15 Hydrology

The project site would retain its current drainage patterns with the No Project (No Development) Alternative. The project has been designed to utilize existing on-site drainage facilities and not substantially alter on- and off-site drainage patterns. Runoff volume and flow rates associated with project conditions would be slightly less than those of the current condition (see Tables 8.1 and 8.2). Like the project, the No Project (No Development) Alternative would have less than significant impacts related to hydrology.

9.2.16 Water Quality

The project would implement BMPs to protect and improve water quality. With the No Project (No Development) Alternative, water quality conditions on the project site would not receive the

benefits of the latest water quality improvements. Currently, there are no structural BMPs being utilized on-site that could eliminate or substantially reduce the pollutant load of on-site runoff. In accordance with recent storm water quality regulations, the project would incorporate low-impact design, as well as source and structural BMPs, which would lessen or altogether avoid water quality impacts.

9.2.17 Conclusions

Should the No Project (No Development) Alternative be implemented, the project's significant impacts associated with traffic on Pomerado Road would not occur. While adoption of the No Project (No Development) Alternative would maintain the existing undeveloped condition of the site and avoid impacts associated with the project, none of the project objectives would be attained.

9.3 No Project – Alternative Consistent with Approved CUP

The project site is currently a part of Alliant International University, is designated as University land use in the SMRCP, and is permitted by CUP 133-PC. In accordance with this alternative, the project site would be developed with the uses as permitted by CUP 133-PC. The original CUP 133-PC Phases 12, 14, and 15 encompassed the project site as well a portion of the Alliant International University property to the west and the Chabad property to the east. Figure 9-1 shows the plot plan for CUP 133-PC Phases 12, 14, and 15 which would be constructed on the project site. Table 9-5 summarizes the uses that could be constructed on the project site in each phase.

TABLE 9-5
CUP 133-PC PERMITTED USES

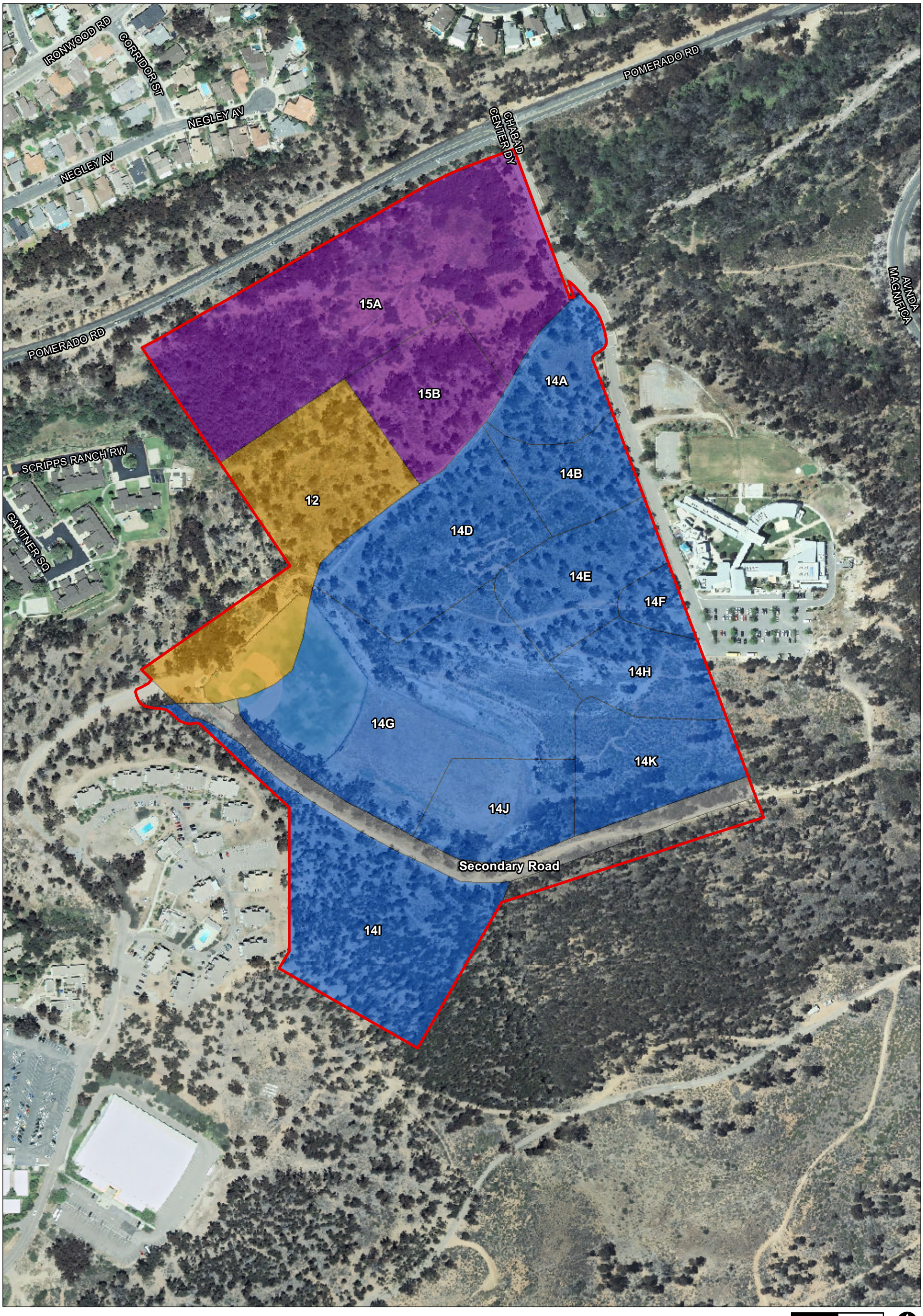
Phase	Uses
12	Auditorium (cultural education center) to accommodate a maximum of 2,100 persons
14	
14A*	Academic facility consisting of classrooms, faculty offices, student study areas, and other related facilities
14B*	Academic facility consisting of classrooms, faculty offices, student study areas, and other related facilities
14D	Academic facility consisting of classrooms, faculty offices, student study areas, and other related facilities
14E*	Academic facility consisting of classrooms, faculty offices, student study areas, and other related facilities
14F*	Multi-purpose building, including center functions; academic facility consisting of classrooms, faculty offices, student study areas, and other related facilities.
14G	Physical education field house (gymnasium) and physical education play field.
14H*	Academic facility consisting of classrooms, faculty offices, student study areas, and other related facilities
14I**	Residence halls with a capacity of approximately 1,000 students
14J	Amphitheater
14K*	Parking
15	
15A*	Physical education play field, permanent and temporary parking
15B	Academic facility consisting of extended learning facility, including lecture halls, classrooms, faculty offices, and related academic facilities; parking

*Portions of Phases 14A, 14B, 14E, 14F, 14H, 14K, and 15A were located on the Chabad property to the east, which is now under a separate permit. However, these land uses would still be allowed on the project site under CUP 133-PC.
**A portion of Phase 14I is located on the Alliant International University property to the west, and is developed with housing for approximately 400 students and the ability to house up to approximately 3,400 students (Reciprocal Grant of Easements, Exhibit "I", recorded November 19, 2007). For this analysis, it was assumed that the portion of Phase 14I located on the project site could be developed with residence halls with a capacity of approximately 1,000 students.

The uses permitted by CUP 133-PC on the project site include an auditorium (cultural education center) to accommodate a maximum of 2,100 persons; academic facilities consisting of classrooms, lecture halls, faculty offices, and student study areas; a physical education gymnasium and play field; residence halls; an amphitheater; and permanent and temporary parking. As shown, the development footprint of this alternative includes the entire project site.

CUP 133-PC was approved prior to CEQA; therefore, there is no environmental documentation. However, in order to compare this alternative to the project, an analysis of the impacts associated with the Alternative Consistent with CUP 133-PC, and a comparison of those impacts to those associated with the project, is provided below.

Image source: SanGIS (flown May 2012)



Project Boundary

CUP133-PC Uses

- Phase 12
- Phase 14
- Phase 15
- Secondary Road

0 Feet 250

RECON

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FIGURE 9-1

CUP 133-PC Permitted Uses

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9.3.1 Land Use

While this alternative would not conflict with the adopted land use designation, it would conflict with many of the SMRCP goals and policies due to the development and footprint permitted under CUP 133-PC. The CUP 133-PC encompasses the entire project site, including the open space, MHPA, and Carroll Canyon, which would be preserved under the project. Impacts associated with plan consistency, LDC compliance, MHPA adjacency, and noise/land use compatibility would be incrementally greater when compared to the project.

9.3.2 Traffic Circulation

This alternative is consistent with the adopted land use designation, thus it is accounted for in regional transportation plans. The LDC Trip Generation Manual indicates that University uses generate 100 trips per acre. If the project site were to be developed with the uses summarized in Table 9-5, this alternative would generate approximately 5,300 trips. The project would generate 1,880 ADT. Thus, when compared to the project, buildout of CUP 133-PC would result in greater traffic volumes on Pomerado Road. Tables 9-6, 9-7, and 9-8 summarize the existing, near-term, and year 2030 with and without the Alternative Consistent with the Approved CUP street segment impacts. As shown, when compared to the project (see Tables 4.2-5, 4.2-9, and 4.2-13), this alternative would result in greater significant and unavoidable traffic impacts.

9.3.3 Biological Resources

This alternative would include grading and development on the entire project site, including Carroll Canyon, the MHPA, and open space that would be preserved in the northern portion of the site under the project. This alternative would also result in significant irreversible impacts to sensitive habitats and wetlands. Because this alternative would include more development and a larger footprint, impacts associated with sensitive species and habitats, jurisdictional wetlands and waters, wildlife corridors, and MHPA adjacency would be incrementally greater when compared to the project.

TABLE 9-6
ALTERNATIVE CONSISTENT WITH APPROVED CUP
EXISTING WITH AND WITHOUT PROJECT STREET SEGMENT OPERATIONS

Road	Segment	Class.	Existing			Existing + Project			ΔV/C	*Sig. Impact?*
			LOS	Volume	V/C	LOS	Volume	V/C		
Miramar Road	I-15 SB Ramps to I-15 NB Ramps	PA	C	41,208	0.69	C	44,706	0.75	0.058	*NO*
Pomerado Road	I-15 NB Ramps to Willow Creek Road	2-Ca	F	27,827	1.86	F	31,643	2.11	**0.254**	***YES***
	Willow Creek Road to Scripps Ranch Boulevard	2-Ca	F	22,038	1.47	F	25,907	1.73	**0.258**	***YES***
	Scripps Ranch Boulevard to Chabad Center Driveway	2-Ca	F	22,199	1.48	F	26,439	1.76	**0.283**	***YES***
	Chabad Center Driveway to Avenida Magnifica	2-Ca	F	21,847	1.46	F	22,907	1.53	**0.071**	***YES***

TABLE 9-7
ALTERNATIVE CONSISTENT WITH APPROVED CUP
NEAR-TERM WITH AND WITHOUT PROJECT STREET SEGMENT OPERATIONS

Road	Segment	Class.	Near-term			Near-term + Project			ΔV/C	*Sig. Impact?*
			LOS	Volume	V/C	LOS	Volume	V/C		
Miramar Road	I-15 SB Ramps to I-15 NB Ramps	PA	C	41,723	0.70	C	45,221	0.75	0.058	*NO*
Pomerado Road	I-15 NB Ramps to Willow Creek Road	2-Ca	F	27,938	1.86	F	31,754	2.12	**0.254**	***YES***
	Willow Creek Road to Scripps Ranch Boulevard	2-Ca	F	22,119	1.47	F	25,988	1.73	**0.258**	***YES***
	Scripps Ranch Boulevard to Chabad Center Driveway	2-Ca	F	22,260	1.48	F	26,500	1..77	**0.283**	***YES***
	Chabad Center Driveway to Avenida Magnifica	2-Ca	F	21,908	1.46	F	22,968	1.53	**0.071**	***YES***

TABLE 9-8
ALTERNATIVE CONSISTENT WITH APPROVED CUP
YEAR 2030 WITH AND WITHOUT PROJECT STREET SEGMENT OPERATIONS

Road	Segment	Class.	Near-term			Near-term + Project			ΔV/C	*Sig. Impact?*
			LOS	Volume	V/C	LOS	Volume	V/C		
Miramar Road	I-15 SB Ramps to I-15 NB Ramps	PA	C	45,000	0.75	C	48,498	0.81	0.058	*NO*
Pomerado Road	I-15 NB Ramps to Willow Creek Road	2-Ca	F	36,000	2.40	F	39,816	2.65	**0.254**	***YES***
	Willow Creek Road to Scripps Ranch Boulevard	2-Ca	F	30,000	2.00	F	33,869	2.26	**0.258**	***YES***
	Scripps Ranch Boulevard to Chabad Center Driveway	2-Ca	F	28,000	1.87	F	32,240	2.15	**0.283**	***YES***
	Chabad Center Driveway to Avenida Magnifica	2-Ca	F	28,000	1.87	F	29,060	1.94	**0.071**	***YES***

Legend:
Class. = Functional Class
LOS = Level of Service
V/C = Volume to Capacity Ratio
ΔV/C = Change in V/C Ratio
PA = 6-lane Prime Arterial
2-Ca = 2-lane Collector with painted median/turn lane

9.3.4 Noise

Noise levels under the Alternative Consistent with CUP 133-PC would be greater than those associated with the project. Because of the greater amount of traffic generated, traffic noise on Pomerado Road and other area roadways would increase when compared to the project. Stationary noise would be incrementally increased because of the increase in square footage requiring mechanical equipment. Additionally, because of the larger footprint, construction equipment would operate closer to residential uses located north of Pomerado Road.

9.3.5 Historical Resources

This alternative would result in greater impacts to historical resources because of the increased grading footprint. As with the project, this grading and excavation activities under this alternative would require monitoring for cultural resources. However, because of the increased footprint when compared to the project, there would be greater potential to uncover subsurface historical resources.

9.3.6 Paleontological Resources

This alternative would result in greater impacts to paleontological resources because of the increased grading footprint. As with the project, grading and excavation activities under this alternative would require monitoring for paleontological resources. However, because of the increased footprint when compared to the project, there would be greater potential to uncover subsurface paleontological resources.

9.3.7 Visual Quality/Neighborhood Character/Landform Alteration

The scale of the Alternative Consistent with CUP 133-PC would be larger when compared to the project. Because the development footprint would be larger than the project, the encroachment into steep slopes would be greater. The SMRCP identifies the public vantage point relevant to the project site, as Pomerado Road overlooks Carroll Canyon. Additionally, because buildings would be located closer to Pomerado Road when compared to the project, they would be visible from Pomerado Road and viewpoints to the north. This alternative would have greater impacts to visual quality/neighborhood character/landform alteration when compared to the project.

9.3.8 Health and Safety/Hazardous Materials

Like the project, this alternative would not include uses that would involve hazardous materials and there are no RECs on-site. Impacts related to human health, public safety, and hazardous materials would be similar to those of the project. Similar to the project, this alternative would implement a brush management program in accordance with City standards.

9.3.9 Air Quality

This alternative would result in greater emissions of criteria pollutants due to the increased intensity and traffic. This alternative would not conflict with the RAQS because it would be consistent with the growth projections upon which the RAQS is based. However, it would result in incrementally greater emissions of criteria pollutants when compared to the project.

9.3.10 Greenhouse Gas Emissions

As with air quality, this alternative would result in greater emissions of GHGs due to the increase intensity and traffic. The development under this alternative would be required to demonstrate at least a 28.3 percent reduction in GHG emissions when compared to BAU. However, because of the increase in GHG emissions, GHG impacts would be incrementally greater when compared to the project.

9.3.11 Public Services and Facilities

The on-site student population would increase under this alternative, and the demand for public services would increase correspondingly. As with the project, this alternative would not directly necessitate the construction of new facilities or the modification of existing facilities. Like the project, this alternative would contribute to the cumulative need for fire stations in the region and would require payment of FBA fees in accordance with the PFFP (see Section 4.11). Impacts would be less than significant, but incrementally greater when compared to the project.

9.3.12 Public Utilities

Implementation of the Alternative Consistent with CUP 133-PC would increase demands on public utilities over the project. This alternative would have a greater water demand and generate more solid waste than the project. As with the project, an ongoing waste management program to manage waste disposal in order to meet state and local waste reduction goals would be implemented in order to ensure that the development meets or exceeds the City's requirements. Impacts associated with water supply and solid waste would be incrementally greater when compared to the project.

9.3.13 Energy

Impacts to energy conservation under this alternative would be incrementally increased when compared to those of the project. This alternative would incorporate design measures (related to electricity, natural gas and water use) similar to those of the project that would, at a minimum, meet current energy and water efficiency regulations. As with the project, this alternative would not result in the use of excessive amounts of fuel or other forms of energy during the construction phase of the project. Impacts would be less than significant but incrementally greater compared to the project.

9.3.14 Geology and Soils

Geologic conditions on the project site would pose the same constraints on development under the Alternative Consistent with CUP 133-PC as with the project. Like the project, these constraints would be addressed through specific measures and design considerations contained in the Geotechnical Investigation and City ordinances to reduce impacts to below a level of significance.

9.3.15 Hydrology

This alternative would increase the extent and intensity of development and incrementally increase the impacts to hydrology. Like the project, this alternative would be designed to include a storm drain system that, like the project, would direct all runoff into an on-site system designed to retain runoff to pre-development flows. As with the project, this alternative would comply with San Diego County Hydrology Manual, the San Diego Drainage Design Manual, and RWQCB requirements. Impacts would be less than significant, but incrementally increased compared to the project.

9.3.16 Water Quality

This alternative would increase the extent and intensity of development and incrementally increase the impacts to water quality. Like the project, this alternative would implement BMPs to protect and improve water quality. In accordance with recent storm water quality regulations, this alternative would incorporate low-impact design, as well as source and structural BMPs, which would lessen or altogether avoid water quality impacts. Impacts would be less than significant, but incrementally increased compared to the project.

9.3.17 Conclusions

Impacts associated with this alternative would be greater than those associated with the project. This alternative would increase the number of trips on Pomerado Road and result in greater significant unmitigated traffic impacts. As a result of the increase in traffic and intensity of development, impacts associated with noise, air quality, and GHG emissions would also be greater than the project. Impacts associated with other issue areas analyzed in the EIR would be incrementally increased because of increased intensity, grading, and traffic associated with this alternative.

9.4 Reduced Grading/Development Alternative

The Reduced Grading/Development Alternative would construct fewer CCRC units and would reduce the grading footprint compared to the project. To eliminate encroachment into steep slopes, this alternative would result in 22 fewer villa units when compared to the project, and

there would be no grading of the steep slopes located in the southwest corner of the project site (Figure 9-2). In addition to the loss of these units, to avoid impacts to steep hillsides, an additional shift and redesign of the independent living units and commons building would be required.

A comparative analysis of the impacts associated with the Reduced Grading/Development Alternative and the project is provided below.

9.4.1 Land Use

Like the project, the Reduced Grading/Development Alternative would not be consistent with the University land use designation of the SMRCP. Overall, like the project, the Reduced Grading/Development Alternative would be consistent with most of the City General Plan and SMRCP goals, objectives, and policies regarding the provision senior housing and health center facilities to meet the needs of the population, preserving and dedicating resource-based open space to the MHPA, implementing a green building design that includes improved energy efficiency and water conservation, and providing transportation services for its residents. However, as discussed in Section 9.3.2, the increase in traffic on Pomerado Road would conflict with goals of alleviating traffic in the region. Therefore, like the project, impacts would be significant.

9.4.2 Traffic Circulation

The Reduced Grading/Development Alternative would generate 88 fewer trips than the project, and would therefore result in less project traffic on Pomerado Road. Pomerado Road is projected to operate at an unacceptable LOS even without development of the project site. Tables 9-9, 9-10, and 9-11 summarize the existing, near-term, and year 2030 with and without the Reduced Grading/Development Alternative street segment impacts. As shown, when compared to the project (see Tables 4.2-5, 4.2-9, and 4.2-13), there would be less traffic on Pomerado Road. While this reduction in trips would incrementally reduce the traffic impacts associated with the project, the impacts would remain significant and unavoidable.

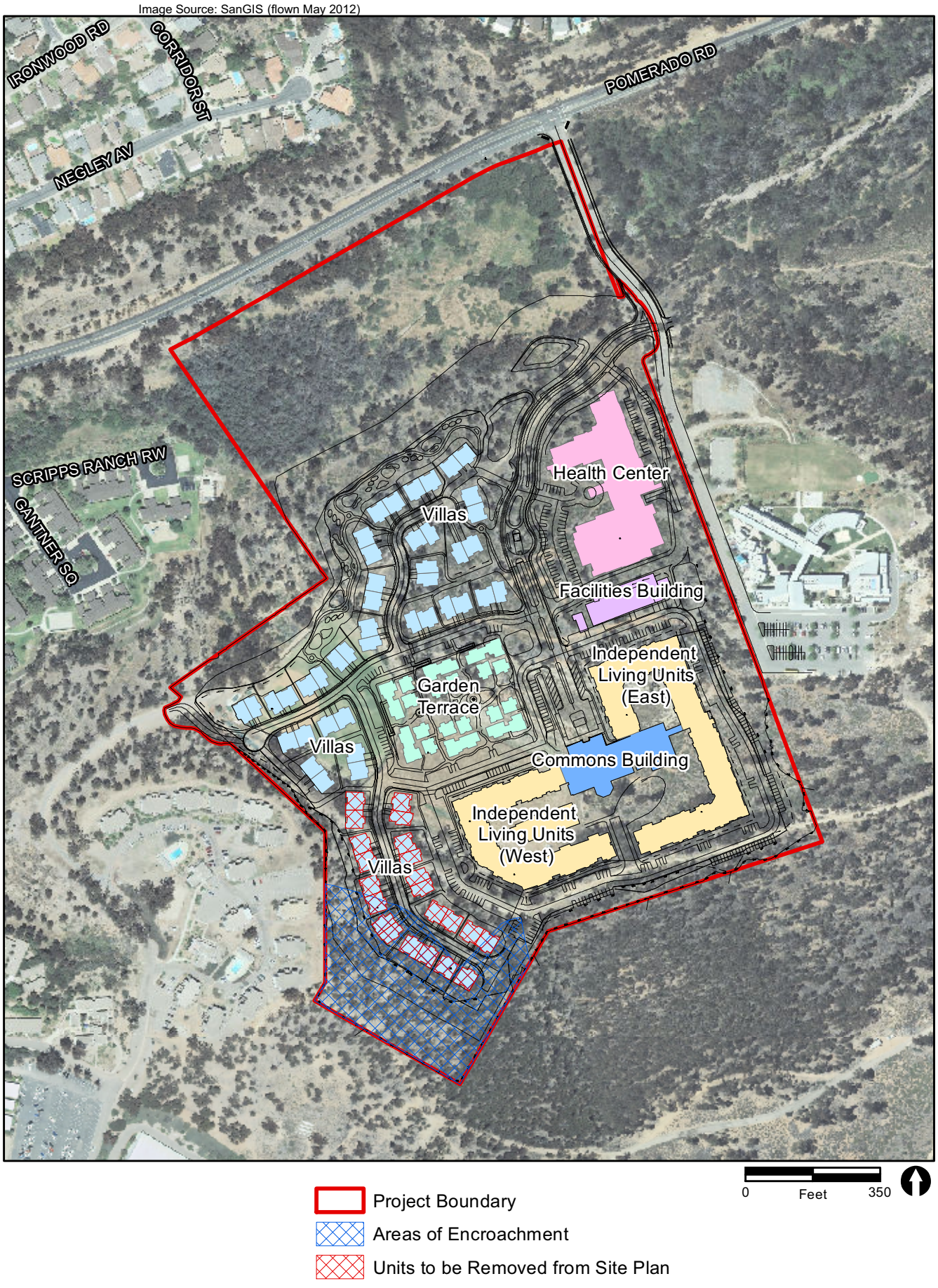

FIGURE 9-2

Reduced Grading/Development Alternative

RECON

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TABLE 9-9
REDUCED GRADING/DEVELOPMENT ALTERNATIVE
EXISTING WITH AND WITHOUT PROJECT STREET SEGMENT OPERATIONS

Road	Segment	Class.	Existing			Existing + Project			ΔV/C	*Sig. Impact?*
			LOS	Volume	V/C	LOS	Volume	V/C		
Miramar Road	I-15 SB Ramps to I-15 NB Ramps	PA	C	41,208	0.69	C	42,391	0.71	0.020	*NO*
Pomerado Road	I-15 NB Ramps to Willow Creek Road	2-Ca	F	27,827	1.86	F	29,117	1.94	**0.086**	***YES***
	Willow Creek Road to Scripps Ranch Boulevard	2-Ca	F	22,038	1.47	F	23,346	1.56	**0.087**	***YES***
	Scripps Ranch Boulevard to Chabad Center Driveway	2-Ca	F	22,199	1.48	F	23,633	1.58	**0.096**	***YES***
	Chabad Center Driveway to Avenida Magnifica	2-Ca	F	21,847	1.46	F	22,205	1.48	**0.024**	***YES***

TABLE 9-10
REDUCED GRADING/DEVELOPMENT ALTERNATIVE
NEAR-TERM WITH AND WITHOUT PROJECT STREET SEGMENT OPERATIONS

Road	Segment	Class.	Near-term			Near-term + Project			ΔV/C	*Sig. Impact?*
			LOS	Volume	V/C	LOS	Volume	V/C		
Miramar Road	I-15 SB Ramps to I-15 NB Ramps	PA	C	41,723	0.70	C	42,906	0.72	0.020	*NO*
Pomerado Road	I-15 NB Ramps to Willow Creek Road	2-Ca	F	27,938	1.86	F	29,228	1.95	**0.086**	***YES***
	Willow Creek Road to Scripps Ranch Boulevard	2-Ca	F	22,119	1.47	F	23,427	1.56	**0.087**	***YES***
	Scripps Ranch Boulevard to Chabad Center Driveway	2-Ca	F	22,260	1.48	F	23,694	1.58	**0.096**	***YES***
	Chabad Center Driveway to Avenida Magnifica	2-Ca	F	21,908	1.46	F	22,266	1.48	**0.024**	***YES***

TABLE 9-11
REDUCED GRADING/DEVELOPMENT ALTERNATIVE
YEAR 2030 WITH AND WITHOUT PROJECT STREET SEGMENT OPERATIONS

Road	Segment	Class.	Near-term			Near-term + Project			ΔV/C	*Sig. Impact?*
			LOS	Volume	V/C	LOS	Volume	V/C		
Miramar Road	I-15 SB Ramps to I-15 NB Ramps	PA	C	45,000	0.75	C	46,183	0.77	0.020	*NO*
Pomerado Road	I-15 NB Ramps to Willow Creek Road	2-Ca	F	36,000	2.40	F	37,290	2.49	**0.086**	***YES***
	Willow Creek Road to Scripps Ranch Boulevard	2-Ca	F	30,000	2.00	F	31,308	2.09	**0.087**	***YES***
	Scripps Ranch Boulevard to Chabad Center Driveway	2-Ca	F	28,000	1.87	F	29,434	1.96	**0.096**	***YES***
	Chabad Center Driveway to Avenida Magnifica	2-Ca	F	28,000	1.87	F	28,358	1.89	**0.024**	***YES***

Legend:
Class. = Functional Class
LOS = Level of Service
V/C = Volume to Capacity Ratio
ΔV/C = Change in V/C Ratio
PA = 6-lane Prime Arterial
2-Ca = 2-lane Collector with painted median/turn lane

9.4.3 Biological Resources

Since the Reduced Grading/Development Alternative would have a smaller development footprint, the impacts associated with this alternative would be reduced when compared to the project. This alternative would result in direct and indirect impacts to biological resources. Direct impacts would be mitigated through habitat, wetland, and non-wetland preservation/creation/ restoration/enhancement and an MHPA boundary line adjustment. The potential for indirect impacts to biological resources in the adjacent MHPA would be mitigated to below a level of significance through adherence to the MHPA Land Use Adjacency Guidelines contained in the MSCP Subarea Plan. As with the project, all direct and indirect biological impacts would be mitigated to a level less than significant.

9.4.4 Noise

Noise impacts under the Reduced Grading/Development Alternative would be similar to those of the project. Noise levels at useable exterior open space areas would be consistent with City guidelines. Exterior and interior noise levels would be less than the applicable City thresholds. Construction noise would be similar to the project, but stationary noise would be incrementally reduced because of the decrease of 22 units requiring mechanical equipment. This incremental reduction would not be substantial in relation to the project.

9.4.5 Historical Resources

Construction of the Reduced Grading/Development Alternative would result in slightly reduced impacts because of the reduced development footprint. As with the project, grading would still be required in areas where there is a potential for subsurface resources to be encountered. Therefore, the project, as well as the Reduced Grading/Development Alternative, would both require monitoring during construction, and the same mitigation would be implemented should resources be encountered.

9.4.6 Paleontological Resources

The project has the potential to impact paleontological resources which may occur on the project site. Impacts would be slightly reduced under this alternative because of the reduced development footprint. As with the project, grading would still be required in areas where there is a potential for subsurface paleontological resources to be encountered. Development under this alternative would be required to implement the same mitigation measures as the project.

9.4.7 Visual Quality/Neighborhood Character/Landform Alteration

The scale of the buildings for the Reduced Grading/Development Alternative would be reduced when compared to the project, which includes a deviation for height and steep slopes. Under

this alternative, there would be no encroachment into the steep slopes in the southwest corner of the project site. Like the project, this alternative would be required to comply with the Steep Hillside Guidelines. This alternative would have less than significant impacts to visual quality/neighborhood character, similar to the project.

9.4.8 Health and Safety/Hazardous Materials

Like the project, the Reduced Grading/Development Alternative would not include uses that would involve hazardous materials and there are no RECs on-site. Impacts related to human health, public safety, and hazardous materials would be similar to those of the project. Similar to the project, this alternative would implement a brush management program in accordance with City standards and wildfire risk impacts would be less than significant.

9.4.9 Air Quality

The Reduced Grading/Development Alternative would result in short-term impacts similar to the project since grading and construction activities would be similar. This alternative would result in a reduced level of traffic-related emissions due to the decrease in trips. Like the project, the Reduced Grading/Development Alternative would not conflict with the RAQS, and air quality impacts would be less than significant.

9.4.10 Greenhouse Gas Emissions

The Reduced Grading/Development Alternative would result in incrementally less GHG emissions when compared to the project because it would generate 88 fewer daily trips. However, the development under this alternative would implement the same project design features as the project that achieve at least a 28.3 percent reduction in GHG emissions when compared to BAU. Like the project, the Reduced Grading/Development Alternative would not conflict with the applicable plans adopted to reduce GHG emissions, and GHG impacts would be less than significant.

9.4.11 Public Services and Facilities

The number of units would decrease under this alternative, and the demand for public services would decrease correspondingly. As with the project, this alternative would not directly necessitate the construction of new facilities or the modification of existing facilities. Like the project, this alternative would contribute to the cumulative need for fire stations in the region and would require the payment of FBA fees in accordance with the PFFP (see Section 4.11). Impacts would be less than significant but incrementally reduced compared to the project.

9.4.12 Public Utilities

Implementation of the Reduced Grading/Development Alternative would reduce demands on public utilities over the project. As with the project, an ongoing waste management program to manage waste disposal in order to meet state and local waste reduction goals would be implemented in order to ensure that the development meets or exceeds the City's requirements. Impacts to public utilities would be less than significant under the Reduced Grading/Development Alternative, and incrementally less than under the project.

9.4.13 Energy

Impacts to energy conservation under the Reduced Grading/Development Alternative would be incrementally reduced when compared to those of the project. This alternative would incorporate design measures (related to electricity, natural gas and water use) similar to those of the project that would exceed current energy and water efficiency regulations. As with the project, this alternative would not result in the use of excessive amounts of fuel or other forms of energy during the construction phase of the project, and impacts would be less than significant.

9.4.14 Geology and Soils

Geologic conditions on the project site would pose the same constraints on development under the Reduced Grading/Development Alternative as with the project. Like the project, these constraints would be addressed through specific measures and design considerations contained in the Geotechnical Investigation and City ordinances to reduce impacts to below a level of significance.

9.4.15 Hydrology

The Reduced Grading/Development Alternative would reduce the extent and intensity of development and incrementally reduce impacts to hydrology. Like the project, this alternative would be designed to include a storm drain system that, like the project, would direct all runoff into an on-site system designed to retain runoff to pre-development flows. As with the project, this alternative would comply with San Diego County Hydrology Manual, the San Diego Drainage Design Manual, and RWQCB requirements. Impacts would be less than significant, but incrementally reduced compared to the project.

9.4.16 Water Quality

The Reduced Grading/Development Alternative would reduce the extent and intensity of development and incrementally reduce the impacts to water quality. Like the project, the Reduced Grading/Development Alternative would implement BMPs to protect and improve water quality. In accordance with storm water quality regulations, this alternative would incorporate low-impact design, as well as source and structural BMPs, which would lessen or

altogether avoid water quality impacts. Impacts would be less than significant, but incrementally reduced compared to the project.

9.4.17 Conclusions

This alternative would reduce the number of trips on Pomerado Road, but would still result in significant unmitigated traffic impacts associated with the project. By reducing the development footprint and grading, and preserving more undisturbed open space, project-related impacts associated with visual quality/neighborhood character/landform alteration, biological resources, historical resources, and paleontological resources would be accordingly reduced when compared to the project. All other impacts under the Reduced Grading/Development Alternative would be the same as compared to the project.

9.5 Environmentally Superior Alternative

CEQA Guidelines (Section 15126.6(e)(2)) require that an environmentally superior alternative be identified among the alternatives considered. The environmentally superior alternative is generally defined as the alternative which would result in the least adverse environmental impacts to the project site and surrounding area.

The Reduced Grading/Development Alternative would be considered the environmentally superior alternative since it would incrementally reduce impacts associated with land use, traffic, biological resources, historical resources, paleontological resources, landform alternation, air quality, greenhouse gases, public services and facilities, and energy compared to the project. While the project would have incrementally greater impacts, all impacts except those related to traffic on Pomerado Road would all be reduced to below a level of significance for the project. Traffic impacts would remain significant and unavoidable for the project, and the Reduced Grading/Development Alternative would not avoid these impacts. Pomerado Road is projected to operate at unacceptable levels of service even without development of the project site. As demonstrated in Tables 9-9, 9-10, and 9-11, when compared to the project (see Tables 4.2-5, 4.2-9, and 4.2-13), there would be less traffic on Pomerado Road. While this reduction in trips would incrementally reduce the traffic impacts associated with the project, the impacts would remain significant and unavoidable. As described above, the Reduced Grading/Development Alternative would meet all of the project's objectives, though to a lesser degree than the project.

10.0 Mitigation Monitoring and Reporting Program

CEQA, Section 21081.6, requires that a mitigation monitoring and reporting program MMRP be adopted upon certification of an EIR to ensure that the mitigation measures are implemented. The mitigation monitoring and reporting program specifies what the mitigation is, the entity responsible for monitoring the program, and when in the process it should be accomplished.

The proposed Glen at Scripps Ranch project is described in the EIR. The EIR, incorporated herein as referenced, focused on issues determined to be potentially significant by the City. The issues addressed in the EIR include land use, traffic circulation, biological resources, noise, historical resources, paleontological resources, visual quality/neighborhood character/landform alteration, health and safety/hazardous materials, air quality, greenhouse gas emissions, public services and facilities, public utilities, energy, geology and soils, hydrology, water quality, and population and housing.

Public Resources Code section 21081.6 requires monitoring of only those impacts identified as significant or potentially significant. After analysis, potentially significant impacts requiring mitigation were identified for land use, traffic circulation, biological resources, historical resources, and paleontological resources. The environmental analysis concluded that the significant and potentially significant impacts associated with land use (MSCP), biological resources, historical resources, and paleontological resources could be avoided or reduced through implementation of recommended mitigation measures. Since Pomerado Road cannot be widened to four lanes, no measures are listed in the MMRP, and impacts would remain significant and unmitigated.

The mitigation monitoring and reporting program for the project is under the jurisdiction of the City and other agencies as specified in the table below. The mitigation monitoring and reporting program for the project addresses only the issue areas identified above as significant. The following is an overview of the mitigation monitoring and reporting program to be completed for the project.

A. GENERAL REQUIREMENTS – PART I
Plan Check Phase (prior to permit issuance)

1. Prior to the issuance of a Notice To Proceed for a subdivision, or any construction permits, such as Demolition, Grading or Building, or beginning any construction related activity on-site, the DSD Director's Environmental Designee shall review and approve all CDs (plans, specification, details, etc.) to ensure the MMRP requirements are incorporated into the design.

2. In addition, the Environmental Designee shall verify that the MMRP Conditions/Notes that apply ONLY to the construction phases of this project are included VERBATIM, under the heading, "**ENVIRONMENTAL/MITIGATION REQUIREMENTS**."

3. These notes must be shown within the first three (3) sheets of the construction documents in the format specified for engineering construction document templates as shown on the City website: http://www.sandiego.gov/development-services/industry/standtemp.shtml

4. The **TITLE INDEX SHEET** must also show on which pages the "Environmental/Mitigation Requirements" notes are provided.

5. **SURETY AND COST RECOVERY –** The Development Services Director or City Manager may require appropriate surety instruments or bonds from private Permit Holders to ensure the long term performance or implementation of required mitigation measures or programs. The City is authorized to recover its cost to offset the salary, overhead, and expenses for City personnel and programs to monitor qualifying projects.

B. GENERAL REQUIREMENTS – PART II
Post Plan Check (After permit issuance/Prior to start of construction)

1. **PRE CONSTRUCTION MEETING IS REQUIRED TEN (10) WORKING DAYS PRIOR TO BEGINNING ANY WORK ON THIS PROJECT:** The PERMIT HOLDER/OWNER is responsible to arrange and perform this meeting by contacting the CITY RESIDENT ENGINEER (RE) of the Field Engineering Division and City staff from MITIGATION MONITORING COORDINATION (MMC). Attendees must also include the Permit holder's Representative(s), Job Site Superintendent and the following consultants: ***EAS STAFF INSERT:*** **[List project specific consultants here]**

   Note: Failure of all responsible Permit Holder's representatives and consultants to attend shall require an additional meeting with all parties present.

CONTACT INFORMATION:

a) The PRIMARY POINT OF CONTACT is the **RE** at the **Field Engineering Division – 858-627-3200**

b) For Clarification of ENVIRONMENTAL REQUIREMENTS, it is also required to call **RE and MMC at 858-627-3360**

2. **MMRP COMPLIANCE:** This Project, Project Tracking System (PTS) #264823 and/or Environmental Document #264823, shall conform to the mitigation requirements contained in the associated Environmental Document and implemented to the satisfaction of the DSD's Environmental Designee (MMC) and the City Engineer (RE). The requirements may not be reduced or changed but may be annotated (i.e., to explain when and how compliance is being met and location of verifying proof, etc.). Additional clarifying information may also be added to other relevant plan sheets and/or specifications as appropriate (i.e., specific locations, times of monitoring, methodology, etc.

   Note: Permit Holder's Representatives must alert RE and MMC if there are any discrepancies in the plans or notes, or any changes due to field conditions. All conflicts must be approved by RE and MMC BEFORE the work is performed.

3. **OTHER AGENCY REQUIREMENTS:** Evidence of compliance with all other agency requirements or permits shall be submitted to the RE and MMC for review and acceptance prior to the beginning of work or within one week of the Permit Holder obtaining documentation of those permits or requirements. Evidence shall include copies of permits, letters of resolution, or other documentation issued by the responsible agency.

   EAS STAFF INSERT: **[List project specific required permits and civil penalty documents here]**

4. **MONITORING EXHIBITS:** All consultants are required to submit, to RE and MMC, a monitoring exhibit on a 11x17-inch reduction of the appropriate construction plan, such as site plan, grading, landscape, etc., marked to clearly show the specific areas including the **LIMIT OF WORK**, scope of that discipline's work, and notes indicating when in the construction schedule that work will be performed. When necessary for clarification, a detailed methodology of how the work will be performed shall be included.

   Note: Surety and Cost Recovery – When deemed necessary by the Development Services Director or City Manager, additional surety instruments or bonds from the private Permit Holder may be

required to ensure the long-term performance or implementation of required mitigation measures or programs. The City is authorized to recover its cost to offset the salary, overhead, and expenses for City personnel and programs to monitor qualifying projects.

5. **OTHER SUBMITTALS AND INSPECTIONS:** The Permit Holder/Owner's representative shall submit all required documentation, verification letters, and requests for all associated inspections to the RE and MMC for approval per the following schedule:

DOCUMENT SUBMITTAL/INSPECTION CHECKLIST

Issue Area	Document Submittal	Associated Inspection/Approvals/Notes
General	Consultant Qualification Letters	Prior to Preconstruction Meeting
General	Consultant Construction Monitoring Exhibits	Prior to or at Preconstruction Meeting
Land Use	Land Use Adjacency Issues CVSRs	Land Use Adjacency Issue Site Observations
Biology	Biologist Limit of Work Verification	Limit of Work Inspection
Biology	Biology Reports	Biology/Habitat Restoration Inspection
Landscape	Tree Protection Arborist Verification	Tree Protect Fence Inspection
Visual Quality	Contour Grading Verification Letter	Contour Grading/Staking Inspection
Visual Quality	Retaining Wall Verification Letter	Retaining Wall Inspection
Paleontology	Paleontology Reports	Paleontology Site Observation
Archaeology	Archaeology Reports	Archaeology/Historic Site Observation
Waste Management	Waste Management Reports	Waste Management Inspections
Bond Release	Request for Bond Release Letter	Final MMRP Inspections Prior to Bond Release Letter

C. SPECIFIC MMRP ISSUE AREA CONDITIONS/REQUIREMENTS

The following table summarizes the potentially significant project impacts and lists the associated mitigation measures and the monitoring efforts necessary to ensure that the measures are properly implemented. All the mitigation measures identified in the EIR are stated herein.

TABLE 10-1
MITIGATION MONITORING AND REPORTING PROGRAM

Potential Significant Impact	Mitigation Measure	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
LAND USE			
MSCP/MHPA Consistency. As identified here and in Land Use Section 4.1.5 of this EIR, indirect impacts to the adjacent MHPA from project construction and operation would be potentially significant. To preclude such impacts, the project would incorporate design features consistent with the City's MHPA Land Use Adjacency Guidelines. In order to assist City staff in determining that these impact-avoiding design features have been included in the project's final plans, verification by a qualified biologist would be required. This verification has been included in the mitigation measure. Coastal California gnatcatcher, and raptors were determined to have the potential to occur in the project area due to the existence of suitable habitat. Indirect impacts to coastal California gnatcatcher and raptors resulting from construction noise would be significant.	**LAND-1:** **a. Protection during Construction** I. Prior to Construction A. **Biologist Verification** – The owner/permittee shall provide a letter to the City's Mitigation Monitoring Coordination (MMC) section stating that a Project Biologist (Qualified Biologist) as defined in the City of San Diego's Biological Guidelines (2012), has been retained to implement the project's biological monitoring program. The letter shall include the names and contact information of all persons involved in the biological monitoring of the project. B. **Preconstruction Meeting** – The Qualified Biologist shall attend the preconstruction meeting, discuss the project's biological monitoring program, and arrange to perform any follow up mitigation measures and reporting including site-specific monitoring, restoration or revegetation, and additional fauna/flora surveys/salvage. C. **Biological Documents** – The Qualified Biologist shall submit all required documentation to MMC verifying that any special mitigation reports including but not limited to, maps, plans, surveys, survey timelines, or buffers are completed or scheduled per City Biology Guidelines, Multiple Species Conservation Program (MSCP), Environmentally Sensitive Lands Ordinance (ESL), project permit conditions; California Environmental Quality Act (CEQA); endangered species acts (ESAs); and/or other local, state or federal requirements. D. **BCME** – The Qualified Biologist shall present a Biological Construction Mitigation/Monitoring Exhibit (BCME) which includes the biological documents in C above. In addition, include: restoration/revegetation plans, plant salvage/relocation requirements (e.g., coastal cactus wren plant salvage, burrowing owl exclusions, etc.), avian or other wildlife surveys/survey schedules (including general avian nesting and USFWS protocol), timing of surveys, wetland buffers, avian construction avoidance areas/noise buffers/ barriers, other impact avoidance areas, and any subsequent requirements determined by the Qualified Biologist and the City ADD/MMC. The BCME shall include a site plan, written and graphic depiction of the project's biological mitigation/monitoring program, and a schedule. The BCME shall be approved by MMC and referenced in the construction documents. E. **Avian Protection Requirements** – To avoid any direct impacts to raptors and/or any native/migratory birds, removal of habitat that supports active nests in the proposed area of disturbance should occur outside of the breeding season for these species (February 1 to September 15). If removal of habitat in the proposed area of disturbance must occur during the breeding season, the Qualified Biologist shall conduct a pre-construction survey to determine the presence or absence of nesting birds on the proposed area of disturbance. The pre-construction survey shall be conducted within 10 calendar days prior to the start of construction activities (including removal of vegetation). The applicant shall submit the results of the pre-construction survey to City DSD for review and approval prior to initiating any construction activities. If nesting birds are detected, a letter report or mitigation plan in conformance with the City's Biology Guidelines and applicable State and Federal Law (i.e. appropriate follow up surveys, monitoring schedules, construction and noise barriers/buffers, etc.) shall be prepared and include proposed measures to be implemented to ensure that take of birds or eggs or disturbance of breeding activities is avoided. The report or mitigation plan shall be submitted to the City for review and approval and implemented to the satisfaction of the City. The City's MMC Section or RE, and Biologist shall verify and approve that all measures identified in the report or mitigation plan are in place prior to and/or during construction. F. **Resource Delineation** – Prior to construction activities, the Qualified Biologist shall supervise the placement of orange construction fencing or equivalent along the limits of disturbance adjacent to sensitive biological habitats and verify compliance with any other project conditions as shown on the BCME. This phase shall include flagging plant specimens and delimiting buffers to protect sensitive biological resources (e.g., habitats/flora & fauna species, including nesting birds) during construction. Appropriate steps/care should be taken to minimize attraction of nest predators to the site. G. **Education** – Prior to commencement of construction activities, the Qualified Biologist shall meet with the owner/permittee or designee and the construction crew and conduct an on-site educational session regarding the need to avoid impacts outside of the approved construction area and to protect sensitive flora and fauna (e.g., explain the avian and wetland buffers, flag system for removal of invasive species or retention of sensitive plants, and clarify acceptable access routes/methods and staging areas, etc.).	Prior to Notice to Proceed (NTP) for any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/ Permits and Building Plans/ Permits, but prior to the first pre-construction meeting.	City of San Diego ADD of the ED

TABLE 10-1
MITIGATION MONITORING AND REPORTING PROGRAM
(continued)

Potential Significant Impact	Mitigation Measure	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
	I. During Construction A. **Monitoring** – All construction (including access/staging areas) shall be restricted to areas previously identified, proposed for development/staging, or previously disturbed as shown on "Exhibit A" and/or the BCME. The Qualified Biologist shall monitor construction activities as needed to ensure that construction activities do not encroach into biologically sensitive areas, or cause other similar damage, and that the work plan has been amended to accommodate any sensitive species located during the pre-construction surveys. In addition, the Qualified Biologist shall document field activity via the Consultant Site Visit Record (CSVR). The CSVR shall be e-mailed to MMC on the 1st day of monitoring, the 1st week of each month, the last day of monitoring, and immediately in the case of any undocumented condition or discovery. B. **Subsequent Resource Identification** – The Qualified Biologist shall note/act to prevent any new disturbances to habitat, flora, and/or fauna onsite (e.g., flag plant specimens for avoidance during access, etc.). If active nests or other previously unknown sensitive resources are detected, all project activities that directly impact the resource shall be delayed until species specific local, state or federal regulations have been determined and applied by the Qualified Biologist. II. Post Construction Measures A. In the event that impacts exceed previously allowed amounts, additional impacts shall be mitigated in accordance with City Biology Guidelines, ESL and MSCP, State CEQA, and other applicable local, state and federal law. The Qualified Biologist shall submit a final BCME/report to the satisfaction of the City ADD/MMC within 30 days of construction completion. **b. MHPA Adjacency** **LAND-2:** Prior to issuance of any construction permit or notice to proceed, DSD/ LDR, and/or MSCP staff shall verify the Applicant has accurately represented the project's design in or on the Construction Documents (CD's/CD's consist of Construction Plan Sets for Private Projects and Contract Specifications for Public Projects) are in conformance with the associated discretionary permit conditions and Exhibit "A", and also the City's Multi-Species Conservation Program (MSCP) Multi-Habitat Planning Area (MHPA) Land Use Adjacency Guidelines. The applicant shall provide an implementing plan and include references on/in CD's of the following: A. **Grading/Land Development/MHPA Boundaries** – MHPA boundaries on-site and adjacent properties shall be delineated on the CDs. DSD Planning and/or MSCP staff shall ensure that all grading is included within the development footprint, specifically manufactured slopes, disturbance, and development within or adjacent to the MHPA. For projects within or adjacent to the MHPA, all manufactured slopes associated with site development shall be included within the development footprint. B. **Drainage** – All new and proposed parking lots and developed areas in and adjacent to the MHPA shall be designed so they do not drain directly into the MHPA. All developed and paved areas must prevent the release of toxins, chemicals, petroleum products, exotic plant materials prior to release by incorporating the use of filtration devices, planted swales and/or planted detention/desiltation basins, or other approved permanent methods that are designed to minimize negative impacts, such as excessive water and toxins into the ecosystems of the MHPA. C. **Toxics/Project Staging Areas/Equipment Storage** – Projects that use chemicals or generate by-products such as pesticides, herbicides, and animal waste, and other substances that are potentially toxic or impactive to native habitats/flora/fauna (including water) shall incorporate measures to reduce impacts caused by the application and/or drainage of such materials into the MHPA. No trash, oil, parking, or other construction/development-related material/activities shall be allowed outside any approved construction limits. Where applicable, this requirement shall be incorporated into leases on publicly-owned property when applications for renewal occur. Provide a note in/on the CD's that states: "All construction related activity that may have potential for leakage or intrusion shall be monitored by the Qualified Biologist/Owners Representative or Resident Engineer to ensure there is no impact to the MHPA." D. **Lighting** – Lighting within or adjacent to the MHPA shall be directed away/shielded from the MHPA and be subject to City Outdoor Lighting Regulations per LDC Section 142.0740. E. **Barriers** – New development within or adjacent to the MHPA shall be required to provide barriers (e.g., non-invasive vegetation; rocks/boulders; 6-foot high, vinyl-coated chain link or equivalent fences/walls; and/or signage) along the MHPA boundaries to direct public access to appropriate locations, reduce domestic animal predation, protect wildlife in the preserve, and provide adequate noise reduction where needed. F. **Invasives** – No invasive non-native plant species shall be introduced into areas within or adjacent to the MHPA.		

TABLE 10-1
MITIGATION MONITORING AND REPORTING PROGRAM
(continued)

Potential Significant Impact	Mitigation Measure	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
	G. **Brush Management** – New development adjacent to the MHPA shall be set back from the MHPA to provide required Brush Management Zone 1 area on the building pad outside of the MHPA. Zone 2 may be located within the MHPA provided the Zone 2 management will be the responsibility of a private entity except where narrow wildlife corridors require it to be located outside of the MHPA. Brush management zones will not be greater in size than currently required by the City's regulations, the amount of woody vegetation clearing shall not exceed 50 percent of the vegetation existing when the initial clearing is done and vegetation clearing shall be prohibited within native coastal sage scrub and chaparral habitats from March 1-August 15 except where the City ADD/MMC has documented the thinning would be consist with the City's MSCP Subarea Plan. Existing and approved projects are subject to current requirements of Municipal Code Section 142.0412. H. **Noise** – Due to the site's location adjacent to or within the MHPA where the Qualified Biologist has identified potential nesting habitat for listed avian species, construction noise that exceeds the maximum levels allowed shall be avoided during the breeding seasons for the following: California Gnatcatcher (March 1-August 15). If construction is proposed during the breeding season for the species, U.S. Fish and Wildlife Service protocol surveys shall be required in order to determine species presence/absence. If protocol surveys are not conducted in suitable habitat during the breeding season for the aforementioned listed species, presence shall be assumed with implementation of noise attenuation and biological monitoring. When applicable (i.e., habitat is occupied or if presence of the covered species is assumed), adequate noise reduction measures shall be incorporated as follows: <u>COASTAL CALIFORNIA GNATCATCHER (Federally Threatened)</u> Prior to the issuance of any grading permit the City Manager (or appointed designee) shall verify that the MHPA boundaries and the following project requirements regarding the coastal California gnatcatcher are shown on the construction plans: No clearing, grubbing, grading, or other construction activities shall occur between March 1 and August 15, the breeding season of the coastal California gnatcatcher, until the following requirements have been met to the satisfaction of the City Manager: **a.** A Qualified Biologist (possessing a valid Endangered Species Act Section 10(a)(1)(a) Recovery Permit) shall survey those habitat areas within the MHPA that would be subject to construction noise levels exceeding 60 decibels [dB(A)] hourly average for the presence of the coastal California gnatcatcher. Surveys for the coastal California gnatcatcher shall be conducted pursuant to the protocol survey guidelines established by the U.S. Fish and Wildlife Service within the breeding season prior to the commencement of any construction. If coastal California gnatcatchers are present, then the following conditions must be met: **i.** Between March 1 and August 15, no clearing, grubbing, or grading of occupied coastal California gnatcatcher habitat shall be permitted. Areas restricted from such activities shall be staked or fenced under the supervision of a Qualified Biologist; and **ii.** Between March 1 and August 15, no construction activities shall occur within any portion of the site where construction activities would result in noise levels exceeding 60 dB(A) hourly average at the edge of occupied gnatcatcher habitat. An analysis showing that noise generated by construction activities would not exceed 60 dB(A) hourly average at the edge of occupied habitat must be completed by a Qualified Acoustician (possessing current noise engineer license or registration with monitoring noise level experience with listed animal species) and approved by the City Manager at least two weeks prior to the commencement of construction activities. Prior to the commencement of construction activities during the breeding season, areas restricted from such activities shall be staked or fenced under the supervision of a Qualified Biologist; or **iii.** At least two weeks prior to the commencement of construction activities, under the direction of a qualified acoustician, noise attenuation measures (e.g., berms, walls) shall be implemented to ensure that noise levels resulting from construction activities will not exceed 60 dB(A) hourly average at the edge of habitat occupied by the coastal California gnatcatcher. Concurrent with the commencement of construction activities and the construction of necessary noise attenuation facilities, noise monitoring* shall be conducted at the edge of the occupied habitat area to ensure that noise levels do not exceed 60 dB(A) hourly average. If the noise attenuation techniques implemented are determined to be inadequate by the Qualified Acoustician or biologist, then the associated construction activities shall cease until such time that adequate noise attenuation is achieved or until the end of the breeding season (August 16).		

TABLE 10-1
MITIGATION MONITORING AND REPORTING PROGRAM
(continued)

Potential Significant Impact	Mitigation Measure	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
	* Construction noise monitoring shall continue to be monitored at least twice weekly on varying days, or more frequently depending on the construction activity, to verify that noise levels at the edge of occupied habitat are maintained below 60 dB(A) hourly average or to the ambient noise level if it already exceeds 60 dB(A) hourly average. If not, other measures shall be implemented in consultation with the biologist and the City Manager, as necessary, to reduce noise levels to below 60 dB(A) hourly average or to the ambient noise level if it already exceeds 60 dB(A) hourly average. Such measures may include, but are not limited to, limitations on the placement of construction equipment and the simultaneous use of equipment. **b.** If coastal California gnatcatchers are not detected during the protocol survey, the Qualified Biologist shall submit substantial evidence to the City Manager and applicable resource agencies which demonstrates whether or not mitigation measures such as noise walls are necessary between March 1 and August 15 as follows: i. If this evidence indicates the potential is high for coastal California gnatcatcher to be present based on historical records or site conditions, then condition a.iii shall be adhered to as specified above. **ii.** If this evidence concludes that no impacts to this species are anticipated, no mitigation measures would be necessary.		
BIOLOGICAL RESOURCES			
Sensitive Species. As identified here and in Biological Resources Section 4.3, loss of raptor foraging habitat would be significant. No coastal California gnatcatcher or raptor nests have been observed on-site; however, the on- and off-site project grading and construction could have indirect impacts to Cooper's hawk, coastal California gnatcatcher, raptors, and other migratory or nesting birds located in the MHPA. The project construction activities could directly or indirectly impact nesting birds (including coastal California gnatcatcher, Cooper's hawk, and raptors) from noise, intrusion, water quality, and lighting, potentially resulting in a significant biological impact. Indirect impacts to Cooper's hawk, coastal California gnatcatcher, raptors, and migratory or nesting birds would be significant.	**BIO-1:** To avoid any direct impacts to raptors and/or any native/migratory birds, removal of habitat that supports active nests in the proposed area of disturbance should occur outside of the breeding season for these species (February 1 to September 15). If removal of habitat in the proposed area of disturbance must occur during the breeding season, the Qualified Biologist shall conduct a pre-construction survey to determine the presence or absence of nesting birds on the proposed area of disturbance. The pre-construction (precon) survey shall be conducted within 10 calendar days prior to the start of construction activities (including removal of vegetation). The applicant shall submit the results of the precon survey to City Development Services Department (DSD) for review and approval prior to initiating any construction activities. If nesting birds are detected, a letter report or mitigation plan in conformance with the City's Biology Guidelines and applicable state and federal law (i.e., appropriate follow up surveys, monitoring schedules, construction and noise barriers/buffers, etc.) shall be prepared and include proposed measures to be implemented to ensure that take of birds or eggs or disturbance of breeding activities is avoided. The report or mitigation plan shall be submitted to the City DSD for review and approval and implemented to the satisfaction of the City. The City's Mitigation Monitoring Coordinator or Resident Engineer, and Biologist shall verify and approve that all measures identified in the report or mitigation plan are in place prior to and/or during construction. If nesting birds are not detected during the precon survey, no further mitigation is required. Additionally, the City of San Diego requires general monitoring as part of the avian protection requirements during construction. This requirement states: The Qualified Biologist shall monitor construction activities as needed to ensure that construction activities do not encroach into biologically sensitive areas, or cause other similar damage, and that the work plan has been amended to accommodate any sensitive species located during the pre-construction surveys. See also mitigation measures **LAND-1** and **LAND-2**.	Prior to Notice to Proceed (NTP) for any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/ Permits and Building Plans/ Permits, but prior to the first pre-construction meeting.	City of San Diego ADD of the ED

TABLE 10-1
MITIGATION MONITORING AND REPORTING PROGRAM
(continued)

Potential Significant Impact	Mitigation Measure	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
Sensitive Habitats. The project would impact 28.65 acres of sensitive habitat consisting of disturbed coastal sage scrub, southern mixed chaparral, disturbed southern mixed chaparral, and disturbed non-native grassland. With the proposed MHPA boundary line adjustment, all impacts would occur outside the MHPA. Impacts to sensitive habitats would be significant.	**Sensitive Uplands** **BIO-2:** Prior to the issuance of a Notice to Proceed for a subdivision, or any construction permits, such as Demolition, Grading or Building, or beginning any construction related activity, project upland impacts shall be mitigated in accordance with the San Diego LDC Biology Guidelines, as specified in Table 4.3-4 of the EIR based on mitigation occurring within the MHPA. With approval of the MHPA boundary line adjustment, mitigation for some of the impacts to sensitive vegetation communities would be achieved through the on-site preservation of lands (2.31 acres of disturbed Diegan coastal sage scrub and 0.76 acre of disturbed southern mixed chaparral) outside the development footprint, located on the north end of parcel, and dedication of this acreage to the MHPA in a covenant of easement. Mitigation land shall be conveyed to the City, as described in **BIO-3**. Once the 2.31 acres of disturbed Diegan coastal sage scrub and 0.76 acre of disturbed southern mixed chaparral are applied towards mitigation, the remaining upland mitigation required consists of 10.14 acres of southern mixed chaparral and 1.61 acres of non-native grassland. The remaining 10.14 acres of chaparral mitigation will be satisfied either via a land acquisition and dedication to the MHPA of lands on Alliant International University, south of the project; and/or through purchasing off-site lands within the MHPA. The 1.61 acres of grassland mitigation will be satisfied through payment to the City's Habitat Acquisition Fund and/or through purchasing off-site lands within the MHPA. Mitigation for the 0.17 acre of impacts to non-wetland waters would occur on-site and is discussed in **BIO-4**. **On-Site Preservation** **BIO-3:** After all restoration efforts have been signed off and accepted by the City, the on-site MHPA shall be conveyed to the San Diego's MCSP preserve through one of the following: a) Dedication. The Owner/Permittee/Applicant shall convey the mitigation area in fee title to San Diego, or other conservation entities found acceptable by San Diego, USFWS, or CDFG through an irrevocable offer of dedication via the Final Maps. Conveyance of any land in fee shall require approval from the Park and Recreation Department Open Space Division Deputy Director and shall exclude detention basins or other storm water control facilities and manufactured slopes (with the exception of those that might be associated with the potential landslide area; San Diego Biology Guidelines 2012). b) Covenant of Easement. To the extent consistent with MSCP Implementing Agreement, the Owner/Permittee/Applicant must agree to a covenant of easement for the management of the mitigation area in perpetuity, recorded against the title of the property with the USFWS and the CDFG names as third party beneficiaries. Identification of permissible passive activities and any other conditions of the permit must be incorporated into the covenant. (San Diego Biology Guidelines 2002) c) Any other method of transfer permitted by the San Diego's MSCP Subarea Plan or Implementing Agreement. To the extent consistent with MSCP Implementing Agreement and to facilitate MHPA conveyance, any non-fee areas located in the MHPA shall be lotted separately, with a covenant of easement, and be maintained in perpetuity by the Owner/Permittee/ Applicant, unless otherwise agreed to by San Diego. All other on-site areas can be conveyed through any of the above methods.	Prior to Notice to Proceed (NTP) for any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/ Permits and Building Plans/ Permits, but prior to the first pre-construction meeting.	City of San Diego ADD of the ED
Wetlands. Impacts to ACOE, CDFW, RWQCB, and City wetland and non-wetland streambed waters would be permanent and significant. These jurisdictional resources are composed of vernal pools, willow and mule fat patches, and unvegetated streambed.	**Wetlands** **BIO-4:** Prior to the issuance of a Notice to Proceed for a subdivision, or any construction permits, such as Demolition, Grading, or Building, or beginning any construction related activity on-site, notification to the ACOE Section 404 Nationwide Permit Program, a Streambed Alteration Agreement from the CDFW, and a 401 Water Quality Certification from the RWQCB would be required. To reduce impacts to jurisdictional resources to less than significant, a minimum mitigation of 0.34 acre for impacts to ACOE and CDFW/RWQCB jurisdictional non-wetland waters/streambeds would be required (see Table 4.3-6 of the EIR).	Prior to Notice to Proceed (NTP) for any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/ Permits and Building Plans/ Permits, but prior to the first pre-construction meeting.	City of San Diego ADD of the ED

TABLE 10-1
MITIGATION MONITORING AND REPORTING PROGRAM
(continued)

Potential Significant Impact	Mitigation Measure	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
	BIO-5: Prior to the issuance of a Notice to Proceed for a subdivision, or any construction permits, such as Demolition, Grading or Building, or beginning any construction related activity on-site, the applicant shall obtain all appropriate ACOE permit, CDFW streambed alteration agreement, and RWQCB water quality certification. Mitigation shall proceed according to permitting requirements of the applicable Resource Agencies and shall consist of a 2:1 establishment/creation of riparian habitat to ensure no net loss of non-wetland waters; therefore, a minimum mitigation of 0.34 acre shall be required (see Table 4.3-6 of the EIR). This on-site establishment/creation of ephemeral drainage will occur by widening the existing channel within the northern section of the survey area to achieve a 2:1 ratio (i.e., 0.34 acre). The banks of the new channel would be stabilized with riparian scrub plant species that are tolerant of the drier floodplain conditions. **BIO-6:** Prior to the issuance of a Notice to Proceed for a subdivision, or any construction permits, such as Demolition, Grading or Building, or beginning any construction related activity on-site, a qualified biologist shall submit a final Wetland Mitigation Plan to the USACE, RWQCB, San Diego (Park and Recreation, EAS, and MSCP), and CDFG for review and approval. A conceptual mitigation plan has been provided which illustrates the chosen location of establishment/creation area, methods involved to implement the mitigation effort, and a maintenance and monitoring program which is required to ensure the success of the mitigation (RECON 2015b).		
MHPA Land Use Adjacency. Impacts to the MHPA as a result of edge effects would be significant.	See mitigation measures **LAND-1** and **LAND-3**.	Prior to the issuance of any grading permits and/or the first pre-construction meeting.	City of San Diego ADD of the ED
HISTORICAL RESOURCES			
Prehistoric/Historic Resources. As identified here and in Cultural Resources Section 4.5.3, there is potential for significant subsurface cultural deposits in a small portion of the Carroll Canyon floodplain. If present, grading would uncover and destroy these subsurface resources, thereby resulting in a significant impact.	Due to the potential for buried cultural resources to be encountered below alluvial soils on-site, a qualified archaeological monitor and a Native American monitor shall be present during project-related grading activities in the area shown on Figure 4.5-1. **I. Prior to Permit Issuance** A. Entitlements Plan Check 1. Prior to issuance of any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits or a Notice to Proceed for Subdivisions, but prior to the first preconstruction meeting, whichever is applicable, the ADD Environmental designee shall verify that the requirements for Archaeological Monitoring and Native American monitoring have been noted on the applicable construction documents through the plan check process. B. Letters of Qualification have been submitted to ADD 1. The applicant shall submit a letter of verification to MMC identifying the Principal Investigator (PI) for the project and the names of all persons involved in the archaeological monitoring program, as defined in the City of San Diego Historical Resources Guidelines (HRG). If applicable, individuals involved in the archaeological monitoring program must have completed the 40-hour HAZWOPER training with certification documentation. 2. MMC will provide a letter to the applicant confirming the qualifications of the PI and all persons involved in the archaeological monitoring of the project meet the qualifications established in the HRG. 3. Prior to the start of work, the applicant must obtain written approval from MMC for any personnel changes associated with the monitoring program.	Prior to Notice to Proceed (NTP) for any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/ Permits and Building Plans/ Permits, but prior to the first pre-construction meeting.	City of San Diego ADD of the ED

TABLE 10-1
MITIGATION MONITORING AND REPORTING PROGRAM
(continued)

Potential Significant Impact	Mitigation Measure	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
	II. Prior to Start of Construction A. Verification of Records Search 1. The PI shall provide verification to MMC that a site specific records search (¼-mile radius) has been completed. Verification includes, but is not limited to a copy of a confirmation letter from South Coastal Information Center, or, if the search was in-house, a letter of verification from the PI stating that the search was completed. 2. The letter shall introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities. 3. The PI may submit a detailed letter to MMC requesting a reduction to the ¼-mile radius. B. PI Shall Attend Precon Meetings 1. Prior to beginning any work that requires monitoring; the Applicant shall arrange a Precon Meeting that shall include the PI, Native American consultant/monitor (where Native American resources may be impacted), Construction Manager (CM) and/or Grading Contractor, Resident Engineer (RE), Building Inspector (BI), if appropriate, and MMC. The qualified Archaeologist and Native American Monitor shall attend any grading/excavation related Precon Meetings to make comments and/or suggestions concerning the Archaeological Monitoring program with the Construction Manager and/or Grading Contractor. a. If the PI is unable to attend the Precon Meeting, the Applicant shall schedule a focused Precon Meeting with MMC, the PI, RE, CM or BI, if appropriate, prior to the start of any work that requires monitoring. 2. Identify Areas to be Monitored a. Prior to the start of any work that requires monitoring, the PI shall submit an Archaeological Monitoring Exhibit (AME) (with verification that the AME has been reviewed and approved by the Native American consultant/monitor when Native American resources may be impacted) based on the appropriate construction documents (reduced to 11x17) to MMC identifying the areas to be monitored including the delineation of grading/excavation limits. b. The AME shall be based on the results of a site specific records search as well as information regarding existing known soil conditions (native or formation). 3. When Monitoring Will Occur a. Prior to the start of any work, the PI shall also submit a construction schedule to MMC through the RE indicating when and where monitoring will occur. b. The PI may submit a detailed letter to MMC prior to the start of work or during construction requesting a modification to the monitoring program. This request shall be based on relevant information such as review of final construction documents which indicate site conditions such as depth of excavation and/or site graded to bedrock, etc., which may reduce or increase the potential for resources to be present. **III. During Construction** A. Monitor(s) Shall be Present During Grading/Excavation/Trenching 1. The Archaeological Monitor shall be present full-time during all soil disturbing and grading/excavation/trenching activities which could result in impacts to archaeological resources as identified on the AME. **The CM is responsible for notifying the RE, PI, and MMC of changes to any construction activities such as in the case of a potential safety concern within the area being monitored. In certain circumstances OSHA safety requirements may necessitate modification of the AME.**		

TABLE 10-1
MITIGATION MONITORING AND REPORTING PROGRAM
(continued)

Potential Significant Impact	Mitigation Measure	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
	2. The Native American consultant/monitor shall determine the extent of their presence during soil disturbing and grading/excavation/trenching activities based on the AME and provide that information to the PI and MMC. If prehistoric resources are encountered during the Native American consultant/monitor's absence, work shall stop and the Discovery Notification Process detailed in Section III.B–C and IV.A–D shall commence. 3. The PI may submit a detailed letter to MMC during construction requesting a modification to the monitoring program when a field condition such as modern disturbance post-dating the previous grading/trenching activities, presence of fossil formations, or when native soils are encountered that may reduce or increase the potential for resources to be present. 4. The archaeological and Native American consultant/monitor shall document field activity via the Consultant Site Visit Record (CSVR). The CSVRs shall be faxed by the CM to the RE the first day of monitoring, the last day of monitoring, monthly (**Notification of Monitoring Completion)**, and in the case of ANY discoveries. The RE shall forward copies to MMC. B. Discovery Notification Process 1. In the event of a discovery, the Archaeological Monitor shall direct the contractor to temporarily divert all soil disturbing activities, including but not limited to digging, trenching, excavating or grading activities in the area of discovery and in the area reasonably suspected to overlay adjacent resources and immediately notify the RE or BI, as appropriate. 2. The Monitor shall immediately notify the PI (unless Monitor is the PI) of the discovery. 3. The PI shall immediately notify MMC by phone of the discovery, and shall also submit written documentation to MMC within 24 hours by fax or email with photos of the resource in context, if possible. 4. No soil shall be exported off-site until a determination can be made regarding the significance of the resource specifically if Native American resources are encountered. C. Determination of Significance 1. The PI and Native American consultant/monitor, where Native American resources are discovered shall evaluate the significance of the resource. If Human Remains are involved, follow protocol in Section IV below. a. The PI shall immediately notify MMC by phone to discuss significance determination and shall also submit a letter to MMC indicating whether additional mitigation is required. b. If the resource is significant, the PI shall submit an Archaeological Data Recovery Program (ADRP) which has been reviewed by the Native American consultant/monitor, and obtain written approval from MMC. Impacts to significant resources must be mitigated before ground disturbing activities in the area of discovery will be allowed to resume. **Note: If a unique archaeological site is also an historical resource as defined in CEQA, then the limits on the amount(s) that a project applicant may be required to pay to cover mitigation costs as indicated in CEQA Section 21083.2 shall not apply.** c. If the resource is not significant, the PI shall submit a letter to MMC indicating that artifacts will be collected, curated, and documented in the Final Monitoring Report. The letter shall also indicate that that no further work is required.		

TABLE 10-1
MITIGATION MONITORING AND REPORTING PROGRAM
(continued)

Potential Significant Impact	Mitigation Measure	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
	IV. Discovery of Human Remains If human remains are discovered, work shall halt in that area and no soil shall be exported off-site until a determination can be made regarding the provenance of the human remains; and the following procedures as set forth in CEQA Section 15064.5(e), the California Public Resources Code (Sec. 5097.98) and State Health and Safety Code (Sec. 7050.5) shall be undertaken: A. Notification 1. Archaeological Monitor shall notify the RE or BI as appropriate, MMC, and the PI, if the Monitor is not qualified as a PI. MMC will notify the appropriate Senior Planner in the EAS of the Development Services Department to assist with the discovery notification process. 2. The PI shall notify the Medical Examiner after consultation with the RE, either in person or via telephone. B. Isolate discovery site 1. Work shall be directed away from the location of the discovery and any nearby area reasonably suspected to overlay adjacent human remains until a determination can be made by the Medical Examiner in consultation with the PI concerning the provenance of the remains. 2. The Medical Examiner, in consultation with the PI, will determine the need for a field examination to determine the provenance. 3. If a field examination is not warranted, the Medical Examiner will determine with input from the PI, if the remains are or are not most likely to be of Native American origin. C. If Human Remains **ARE** determined to be Native American 1. The Medical Examiner will notify the Native American Heritage Commission (NAHC) within 24 hours. By law, **ONLY** the Medical Examiner can make this call. 2. NAHC will immediately identify the person or persons determined to be the Most Likely Descendent (MLD) and provide contact information. 3. The MLD will contact the PI within 24 hours or sooner after the Medical Examiner has completed coordination, to begin the consultation process in accordance with CEQA Section 15064.5(e), the California Public Resources and Health & Safety Codes. 4. The MLD will have 48 hours to make recommendations to the property owner or representative, for the treatment or disposition with proper dignity, of the human remains and associated grave goods.		

TABLE 10-1
MITIGATION MONITORING AND REPORTING PROGRAM
(continued)

Potential Significant Impact	Mitigation Measure	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
	5. Disposition of Native American Human Remains will be determined between the MLD and the PI, and, if: a. The NAHC is unable to identify the MLD, OR the MLD failed to make a recommendation within 48 hours after being notified by the Commission; OR; b. The landowner or authorized representative rejects the recommendation of the MLD and mediation in accordance with PRC 5097.94 (k) by the NAHC fails to provide measures acceptable to the landowner, THEN, c. In order to protect these sites, the Landowner shall do one or more of the following: (1) Record the site with the NAHC; (2) Record an open space or conservation easement on the site; (3) Record a document with the County. d. Upon the discovery of multiple Native American human remains during a ground disturbing land development activity, the landowner may agree that additional conferral with descendants is necessary to consider culturally appropriate treatment of multiple Native American human remains. Culturally appropriate treatment of such a discovery may be ascertained from review of the site utilizing cultural and archaeological standards. Where the parties are unable to agree on the appropriate treatment measures the human remains and buried with Native American human remains shall be reinterred with appropriate dignity, pursuant to Section 5.c., above. D. If Human Remains are **NOT** Native American 1. The PI shall contact the Medical Examiner and notify them of the historic era context of the burial. 2. The Medical Examiner will determine the appropriate course of action with the PI and City staff (PRC 5097.98). 3. If the remains are of historic origin, they shall be appropriately removed and conveyed to the San Diego Museum of Man for analysis. The decision for internment of the human remains shall be made in consultation with MMC, EAS, the applicant/landowner, any known descendant group, and the San Diego Museum of Man. **V. Night and/or Weekend Work** A. If night and/or weekend work is included in the contract 1. When night and/or weekend work is included in the contract package, the extent and timing shall be presented and discussed at the precon meeting.		

Potential Significant Impact	Mitigation Measure	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
	2. The following procedures shall be followed. a. No Discoveries In the event that no discoveries were encountered during night and/or weekend work, the PI shall record the information on the CSVR and submit to MMC via fax by 8 AM of the next business day. b. Discoveries All discoveries shall be processed and documented using the existing procedures detailed in Sections III - During Construction, and IV – Discovery of Human Remains. Discovery of human remains shall always be treated as a significant discovery. c. Potentially Significant Discoveries If the PI determines that a potentially significant discovery has been made, the procedures detailed under Section III - During Construction and IV – Discovery of Human Remains shall be followed. d. The PI shall immediately contact MMC, or by 8 A.M. of the next business day to report and discuss the findings as indicated in Section III-B, unless other specific arrangements have been made. B. If night and/or weekend work becomes necessary during the course of construction 1. The Construction Manager shall notify the RE, or BI, as appropriate, a minimum of 24 hours before the work is to begin. 2. The RE, or BI, as appropriate, shall notify MMC immediately. C. All other procedures described above shall apply, as appropriate. **VI. Post Construction** A. Preparation and Submittal of Draft Monitoring Report 1. The PI shall submit two copies of the Draft Monitoring Report (even if negative), prepared in accordance with the Historical Resources Guidelines (Appendix C/D) which describes the results, analysis, and conclusions of all phases of the Archaeological Monitoring Program (with appropriate graphics) to MMC for review and approval within 90 days following the completion of monitoring. **It should be noted that if the PI is unable to submit the Draft Monitoring Report within the allotted 90-day timeframe resulting from delays with analysis, special study results or other complex issues, a schedule shall be submitted to MMC establishing agreed due dates and the provision for submittal of monthly status reports until this measure can be met.** a. For significant archaeological resources encountered during monitoring, the Archaeological Data Recovery Program shall be included in the Draft Monitoring Report. b. Recording Sites with State of California Department of Parks and Recreation The PI shall be responsible for recording (on the appropriate State of California Department of Park and Recreation forms—DPR 523 A/B) any significant or potentially significant resources encountered during the Archaeological Monitoring Program in accordance with the City's Historical Resources Guidelines, and submittal of such forms to the South Coastal Information Center with the Final Monitoring Report. 2. MMC shall return the Draft Monitoring Report to the PI for revision or, for preparation of the Final Report.		

TABLE 10-1
MITIGATION MONITORING AND REPORTING PROGRAM
(continued)

Potential Significant Impact	Mitigation Measure	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
	3. The PI shall submit revised Draft Monitoring Report to MMC for approval. 4. MMC shall provide written verification to the PI of the approved report. 5. MMC shall notify the RE or BI, as appropriate, of receipt of all Draft Monitoring Report submittals and approvals. B. Handling of Artifacts 1. The PI shall be responsible for ensuring that all cultural remains collected are cleaned and catalogued 2. The PI shall be responsible for ensuring that all artifacts are analyzed to identify function and chronology as they relate to the history of the area; that faunal material is identified as to species; and that specialty studies are completed, as appropriate. 3. The cost for curation is the responsibility of the property owner. C. Curation of artifacts: Accession Agreement and Acceptance Verification 1. The PI shall be responsible for ensuring that all artifacts associated with the survey, testing and/or data recovery for this project are permanently curated with an appropriate institution. This shall be completed in consultation with MMC and the Native American representative, as applicable. 2. The PI shall include the Acceptance Verification from the curation institution in the Final Monitoring Report submitted to the RE or BI and MMC. 3. When applicable to the situation, the PI shall include written verification from the Native American consultant/monitor indicating that Native American resources were treated in accordance with state law and/or applicable agreements. If the resources were reinterred, verification shall be provided to show what protective measures were taken to ensure no further disturbance occurs in accordance with Section IV – Discovery of Human Remains, Subsection 5. D. Final Monitoring Report(s) 1. The PI shall submit one copy of the approved Final Monitoring Report to the RE or BI as appropriate, and one copy to MMC (even if negative), within 90 days after notification from MMC that the draft report has been approved. 2. The RE shall, in no case, issue the Notice of Completion and/or release of the Performance Bond for grading until receiving a copy of the approved Final Monitoring Report from MMC which includes the Acceptance Verification from the curation institution.		

TABLE 10-1
MITIGATION MONITORING AND REPORTING PROGRAM
(continued)

Potential Significant Impact	Mitigation Measure	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
PALEONTOLOGICAL RESOURCES			
High and Medium Resource Potential. As identified here and in Paleontological Resources Section 4.6.3, implementation of the project has the potential to result in significant impacts to paleontological resources due to grading within formations. Impacts would be significant.	**I. Prior to Permit Issuance** A. Entitlements Plan Check 1. Prior to issuance of any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits or a Notice to Proceed for Subdivisions, but prior to the first preconstruction meeting, whichever is applicable, the ADD Environmental designee shall verify that the requirements for Paleontological Monitoring have been noted on the appropriate construction documents. B. Letters of Qualification have been submitted to ADD 1. The applicant shall submit a letter of verification to MMC identifying the PI for the project and the names of all persons involved in the paleontological monitoring program, as defined in the City of San Diego Paleontology Guidelines. 2. MMC will provide a letter to the applicant confirming the qualifications of the PI and all persons involved in the paleontological monitoring of the project. 3. Prior to the start of work, the applicant shall obtain approval from MMC for any personnel changes associated with the monitoring program. **II. Prior to Start of Construction** A. Verification of Records Search 1. The PI shall provide verification to MMC that a site specific records search has been completed. Verification includes, but is not limited to a copy of a confirmation letter from San Diego Natural History Museum, other institution or, if the search was in-house, a letter of verification from the PI stating that the search was completed. 2. The letter shall introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities. B. PI Shall Attend Precon Meetings 1. Prior to beginning any work that requires monitoring; the Applicant shall arrange a Precon Meeting that shall include the PI, Construction Manager (CM) and/or Grading Contractor, Resident Engineer (RE), Building Inspector (BI), if appropriate, and MMC. The qualified paleontologist shall attend any grading/excavation related Precon Meetings to make comments and/or suggestions concerning the Paleontological Monitoring program with the Construction Manager and/or Grading Contractor. a. If the PI is unable to attend the Precon Meeting, the Applicant shall schedule a focused Precon Meeting with MMC, the PI, RE, CM or BI, if appropriate, prior to the start of any work that requires monitoring. 2. Identify Areas to be Monitored Prior to the start of any work that requires monitoring, the PI shall submit a Paleontological Monitoring Exhibit (PME) based on the appropriate construction documents (reduced to 11x17) to MMC identifying the areas to be monitored including the delineation of grading/excavation limits. The PME shall be based on the results of a site specific records search as well as information regarding existing known soil conditions (native or formation).	Prior to Notice to Proceed (NTP) for any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/ Permits and Building Plans/ Permits, but prior to the first pre-construction meeting.	City of San Diego ADD of ED

TABLE 10-1
MITIGATION MONITORING AND REPORTING PROGRAM
(continued)

Potential Significant Impact	Mitigation Measure	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
	3. When Monitoring Will Occur a. Prior to the start of any work, the PI shall also submit a construction schedule to MMC through the RE indicating when and where monitoring will occur. b. The PI may submit a detailed letter to MMC prior to the start of work or during construction requesting a modification to the monitoring program. This request shall be based on relevant information such as review of final construction documents which indicate conditions such as depth of excavation and/or site graded to bedrock, presence or absence of fossil resources, etc., which may reduce or increase the potential for resources to be present. **III. During Construction** A. Monitor Shall be Present During Grading/Excavation/Trenching 1. The monitor shall be present full-time during grading/excavation/trenching activities as identified on the PME that could result in impacts to formations with high and moderate resource sensitivity. **The Construction Manager is responsible for notifying the RE, PI, and MMC of changes to any construction activities such as in the case of a potential safety concern within the area being monitored. In certain circumstances OSHA safety requirements may necessitate modification of the PME.** 2. The PI may submit a detailed letter to MMC during construction requesting a modification to the monitoring program when a field condition such as trenching activities that do not encounter formational soils as previously assumed, and/or when unique/unusual fossils are encountered, which may reduce or increase the potential for resources to be present. 3. The monitor shall document field activity via the Consultant Site Visit Record (CSVR). The CSVR's shall be faxed by the CM to the RE the first day of monitoring, the last day of monitoring, monthly (**Notification of Monitoring Completion)**, and in the case of ANY discoveries. The RE shall forward copies to MMC. B. Discovery Notification Process 1. In the event of a discovery, the Paleontological Monitor shall direct the contractor to temporarily divert trenching activities in the area of discovery and immediately notify the RE or BI, as appropriate. 2. The Monitor shall immediately notify the PI (unless Monitor is the PI) of the discovery. 3. The PI shall immediately notify MMC by phone of the discovery, and shall also submit written documentation to MMC within 24 hours by fax or email with photos of the resource in context, if possible. C. Determination of Significance 1. The PI shall evaluate the significance of the resource. a. The PI shall immediately notify MMC by phone to discuss significance determination and shall also submit a letter to MMC indicating whether additional mitigation is required. The determination of significance for fossil discoveries shall be at the discretion of the PI. b. If the resource is significant, the PI shall submit a Paleontological Recovery Program (PRP) and obtain written approval from MMC. Impacts to significant resources must be mitigated before ground disturbing activities in the area of discovery will be allowed to resume.		

TABLE 10-1
MITIGATION MONITORING AND REPORTING PROGRAM
(continued)

Potential Significant Impact	Mitigation Measure	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
	c. If resource is not significant (e.g., small pieces of broken common shell fragments or other scattered common fossils) the PI shall notify the RE, or BI as appropriate, that a non-significant discovery has been made. The Paleontologist shall continue to monitor the area without notification to MMC unless a significant resource is encountered. d. The PI shall submit a letter to MMC indicating that fossil resources will be collected, curated, and documented in the Final Monitoring Report. The letter shall also indicate that no further work is required. **IV. Night and/or Weekend Work** A. If night and/or weekend work is included in the contract 1. When night and/or weekend work is included in the contract package, the extent and timing shall be presented and discussed at the precon meeting. 2. The following procedures shall be followed. a. No Discoveries In the event that no discoveries were encountered during night and/or weekend work, The PI shall record the information on the CSVR and submit to MMC via fax by 8AM on the next business day. b. Discoveries All discoveries shall be processed and documented using the existing procedures detailed in Sections III - During Construction. c. Potentially Significant Discoveries If the PI determines that a potentially significant discovery has been made, the procedures detailed under Section III - During Construction shall be followed. d. The PI shall immediately contact MMC, or by 8AM on the next business day to report and discuss the findings as indicated in Section III-B, unless other specific arrangements have been made. B. If night work becomes necessary during the course of construction 1. The Construction Manager shall notify the RE, or BI, as appropriate, a minimum of 24 hours before the work is to begin. 2. The RE, or BI, as appropriate, shall notify MMC immediately. C. All other procedures described above shall apply, as appropriate. **V. Post Construction** A. Preparation and Submittal of Draft Monitoring Report 1. The PI shall submit two copies of the Draft Monitoring Report (even if negative), prepared in accordance with the Paleontological Guidelines which describes the results, analysis, and conclusions of all phases of the Paleontological Monitoring Program (with appropriate graphics) to MMC for review and approval within 90 days following the completion of monitoring,		

TABLE 10-1
MITIGATION MONITORING AND REPORTING PROGRAM
(continued)

Potential Significant Impact	Mitigation Measure	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
	a. For significant paleontological resources encountered during monitoring, the Paleontological Recovery Program shall be included in the Draft Monitoring Report. b. Recording Sites with the San Diego Natural History Museum The PI shall be responsible for recording (on the appropriate forms) any significant or potentially significant fossil resources encountered during the Paleontological Monitoring Program in accordance with the City's Paleontological Guidelines, and submittal of such forms to the San Diego Natural History Museum with the Final Monitoring Report. 2. MMC shall return the Draft Monitoring Report to the PI for revision or, for preparation of the Final Report. 3. The PI shall submit revised Draft Monitoring Report to MMC for approval. 4. MMC shall provide written verification to the PI of the approved report. 5. MMC shall notify the RE or BI, as appropriate, of receipt of all Draft Monitoring Report submittals and approvals. B. Handling of Fossil Remains 1. The PI shall be responsible for ensuring that all fossil remains collected are cleaned and catalogued. 2. The PI shall be responsible for ensuring that all fossil remains are analyzed to identify function and chronology as they relate to the geologic history of the area; that faunal material is identified as to species; and that specialty studies are completed, as appropriate C. Curation of fossil remains: Deed of Gift and Acceptance Verification 1. The PI shall be responsible for ensuring that all fossil remains associated with the monitoring for this project are permanently curated with an appropriate institution. 2. The PI shall include the Acceptance Verification from the curation institution in the Final Monitoring Report submitted to the RE or BI and MMC. D. Final Monitoring Report(s) 1. The PI shall submit two copies of the Final Monitoring Report to MMC (even if negative), within 90 days after notification from MMC that the draft report has been approved. 2. The RE shall, in no case, issue the Notice of Completion until receiving a copy of the approved Final Monitoring Report from MMC which includes the Acceptance Verification from the curation institution.		

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Agencies and individuals contacted during preparation of the EIR include the following:

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13.0 Certification

This document has been completed by the City of San Diego's Environmental Analysis Section under the direction of the Development Services Department Assistant Deputy Director and is based on independent analysis and determinations made pursuant to the San Diego Land Development Code Section 128.0103.

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Noise Technical Report

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Greenhouse Gas Technical Report

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