THE CITY OF SAN DIEGO

DEVELOPMENT SERVICES DEPARTMENT
Date of Notice: July 3, 2013
PUBLIC NOTICE
OF THE PREPARATION OF A ENVIRONMENTAL IMPACT REPORT
AND
AN ENVIRONMENTAL IMPACT REPORTSCOPING MEETING
SAP No. 24002348

PUBLIC NOTICE: The City of San Diego as the Lead Agency has determined that the project described below will require the preparation of an Environmental Impact Report (EIR) in compliance with the California Environmental Quality Act (CEQA). This Notice of Preparation of a project EIR and Scoping Meeting was publicly noticed and distributed on July 3, 2013. This notice was published in the SAN DIEGO DAILY TRANSCRIPT and placed on the City of San Diego website at, **http://clerkdoc.sannet.gov/Website/publicnotice/pubnotceqa.html**.

SCOPING MEETING: A public scoping meeting will be held by the City of San Diego's Development Services Department on **Wednesday, July 24, 2013, beginning at 6:00 PM and running no later than 8:00 PM at the Scripps Ranch Branch Library. Please note that depending on the number of attendees, the meeting could end earlier than 8:00 PM.** Verbal and written comments regarding the scope and alternatives of the proposed EIR will be accepted at the meeting.

Please send in written/mail-in comments may also be sent to the following address**: E. Shearer-Nguyen, Environmental Planner, City of San Diego Development Services Center, 1222 First Avenue, MS 501, San Diego, CA 92101 or e-mail your comments to DSDEAS@sandiego.gov with the Project Name and Number in the subject line Number** in the subject line within 30 days of the receipt of this notice/date of the Public Notice above. Responsible agencies are requested to indicate their statutory responsibilities in connection with this project when responding. An EIR incorporating public input will then be prepared and distributed for the public to review and comment.

- PROJECT NAME/NO.: **THE GLENN AT SCRIPPS RANCH / 264823**
- COMMUNITY AREA: Scripps Miramar Ranch
- COUNCIL DISTRICT: 5

PROJECT DESCRIPTION The applicant is requesting a CONDITIONAL USE PERMIT to amend Conditional Use Permit 133-PC, a Planned Development Permit, and a Site Development Permit to construct 400 non-acute assisted living units, 50 acute assisted living units (16 of which are memory care units), and 60 skilled nursing beds. The 400 non-acute assisted living units include 64 villa units, 48 garden terrace units, and 288 apartment style units. The 50 acute assisted living units and the 60 skilled nursing beds would be located within the Health Center Building. The proposed project would also include a facilities building and a common building consisting of learning centers, lecture hall, library, auditorium, fine dining, fine arts facilities, tennis court, gardens, fitness

center, and pool. Additionally, the project would construct various associated site improvements (e.g. hardscape and landscaping). The 53-acre project site is located at 10455 Pomerado Road. The land use designation for the project is university within the community plan. The project site is located within RS-1-8 zone, the Federal Aviation Administration (FAA) Part 77 Notification Area, Airport Influence Area (MCAS-Miramar, Review Area 2), and the Residential Tandem Parking Overlay Zone within the Scripps Miramar Ranch Community Plan area. (LEGAL DESCRIPTION: Portion of Parcel 3, Map No. 20640).

Applicant: Continuing Life Communities

Recommended Finding: Pursuant to Section 15060(d) of the CEQA Guidelines, it appears that the proposed project may result in significant environmental impacts in the following areas: **Land Use, Transportation/ Circulation and Parking, Air Quality and Odor, Energy, Biological Resources, Greenhouse Gas Emissions, Health Safety/Hazardous Materials, Historical Resources, Hydrology/Water Quality, Noise, Paleontological Resources, Public Services and Facilities, Public Utilities, Visual Effects/Neighborhood Character, and Cumulative Effects.**

Availability in Alternative Format: To request the this Notice or the City's letter to the applicant detailing the required scope of work (EIR Scoping Letter) in alternative format, call the Development Services Department at (619) 446-5460 (800) 735-2929 (TEXT TELEPHONE).

Additional Information: For environmental review information, contact Elizabeth Shearer-Nguyen at (619) 446-5369. The Scoping Letter and supporting documents may be reviewed, or purchased for the cost of reproduction, at the Fifth floor of the Development Services Department. For information regarding public meetings/hearings on this project, contact the Project Manager, John Fisher, at (619) 446-5231. This notice was published in the SAN DIEGO DAILY TRANSCRIPT and distributed on July 3, 2013.

Cathy Winterrowd
Assistant Deputy Director
Development Services Department

DISTRIBUTION: See Attached.

ATTACHMENTS: Figure 1: Project Vicinity Map
Figure 2: Site Plan
Scoping Letter

Distribution:

FEDERAL GOVERNMENT
Federal Aviation Administration (1)
Commanding General, Community Plans & Liaisons, MCAS Miramar Air Station (13)
U.S. Environmental Protection Agency (19)
U.S. Fish and Wildlife (23)
U.S. Army Corps of Engineers (26)

STATE OF CALIFORNIA
Caltrans District 11 (31)
California Department of Fish and Wildlife (32)
California Department of Toxic Substances Control (39)
California Regional Water Quality Control Board, Region 9 (44)
State Clearinghouse (46A)
California Department of Transportation (51)
California Transportation Commission (51A)
California Transportation Commission (51)
California Native American Heritage Commission (56)
California Highway Patrol (58)

COUNTY OF SAN DIEGO
Leann Williams, Environmental Health (74)
Department of Environmental Health (75)

CITY OF SAN DIEGO
Mayor's Office (91)
Council President Pro Tem Lightner, District 1 (MS10A)
Councilmember Faulconer District 2 (MS10A)
Council President Gloria, District 3 (MS10A)
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Councilmember Alvarez, District 8 (MS10A)
Councilmember Emerald, District 9 (MS10A)
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    EAS
    Project Manager
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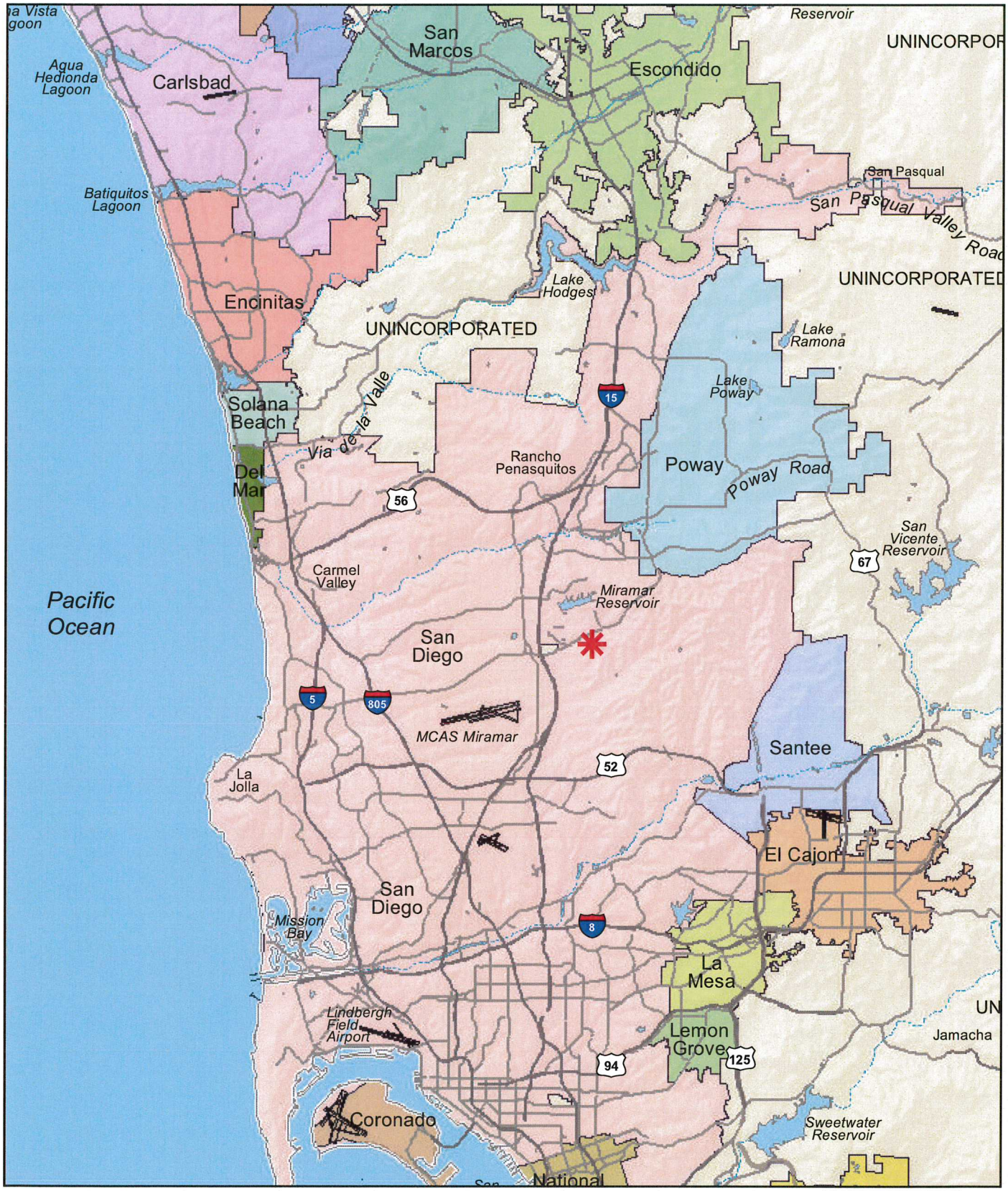
Fire and Life Safety Services (79)
Library Department - Government Documents (81)
Central Library (81A)

CITY OF SAN DIEGO - continued
Scripps Miramar Ranch Branch Library (81FF)
Park and Recreation (89)
Wetlands Advisory Board (91A)
Environmental Services Department (93A)
Tom Tomlinson, Facilities Financing (93B)
Warren Lovell, San Diego Police Department (MS776)
Doug Perry, San Diego Fire-Rescue (MS603)
Larry Trame, San Diego Fire-Rescue (MS603)
City Attorney (MS59)

OTHER ORGANIZATIONS AND INTERESTED INDIVIDUALS
San Diego Unified School District (125)
San Diego Canyonlands (165)
San Diego Natural History Museum (166)
San Diego Audubon Society (167)
San Diego Audubon Society (167A)
California Native Plant Society (170)
Ellen T Bauder (175)
Citizens Coordinate for Century 3 (179)
Endangered Habitats League (182)
Endangered Habitats League (182A)
Vernal Pool Society (185)
San Diego Tracking Team (187)
Carmen Lucas (206)
South Coastal Information Center (210)
San Diego Archaeological Center (212)
Save Our Heritage Organisation (214)
Ron Christman (215)
Louie Guassac (215A)
Clint Linton (215B)
San Diego County Archaeological Society (218)
Kumeyaay Cultural Repatriation Committee (225)
Native American Distribution [Notice and Site Plan Only] (225A-R)
Beeler Canyon Conservancy (436)
Scripps Miramar Ranch Planning Group (437)
Alliant International University (438)
Scripps Ranch Civic Association (440)
Acquisitions, Walter Library USIS
Craig Jones
Mr. David Harbour, Continuing Life Communities
Bobbi Herdes, RECON Environmental
Jesse Fleming, RECON Environmental



Project Location

RECON

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FIGURE 1

Regional Location

Image Source: Copyright 2010, Microsoft, All Rights Reserved (flown May 2010)

0 Feet 300

Project Boundary

FIGURE 2

Site Plan

RECON

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THE CITY OF SAN DIEGO

June 3, 2013

Mr. David Harbour
Continuing Life Communities
1940 Levante Street
Carlsbad, CA 92009

SUBJECT: SCOPE OF WORK FOR A DRAFT ENVIRONMENTAL IMPACT REPORT (EIR) FOR THE GLEN AT SCRIPPS RANCH (Project No. 264823) SCH No. Pending.

Dear Mr. Harbour:

Pursuant to Section 15060(d) of the California Environmental Quality Act (CEQA), the Environmental Analysis Section (EAS) of the City of San Diego Development Services Department has determined that the proposed project may have significant effects on the environment, and the preparation of an Environmental Impact Report (EIR) is required. Staff has determined that a project EIR is the appropriate environmental document for the Glen at Scripps project.

The purpose of this letter is to identify the issues to be specifically addressed in the EIR. The EIR shall be prepared in accordance with the City's "Technical Report and Environmental Impact Report Guidelines," dated September 2002 and updated December 2005. A copy of the current guidelines is attached. The project issues to be discussed in the EIR are outlined below. A Notice of Preparation (NOP) will be distributed to the Responsible Agencies and others who may have an interest in the project as required by CEQA Section 21083.9(a)(2).

Scoping meetings are required by CEQA section 21083.9(a)(2) for projects that may have statewide, regional or area-wide environmental impacts. The City's environmental review staff has determined that this project meets this threshold. A scoping meeting has been scheduled

for July 24, 2013 from 6:00PM to 8:00PM at the Scripps Ranch Library. Please note, changes or additions to this scope of work may be required as a result of input received in response to the Scoping Meeting and Notice of Preparation. Any such changes shall be disclosed within the EIR.

Project Description:

Project proposes to construct 400 non-acute assisted living units, 50 acute assisted living units (16 of which are memory care units), and 60 skilled nursing beds. The 400 non-acute assisted living units include 64 villa units, 48 garden terrace units, and 288 apartment style units. The 50 acute assisted living units and the 60 skilled nursing beds would be located within the Health Center Building. The proposed project would also include a facilities building and a common building consisting of learning centers, lecture hall, library, auditorium, fine dining, fine arts facilities, tennis court, gardens, fitness center, and pool. Additionally, the project would construct various associated site improvements (e.g. hardscape and landscaping). The 53-acre project site is located at 10455 Pomerado Road. The land use designation for the project is university within the community plan. The project site is located within RS-1-8 zone, the Federal Aviation Administration (FAA) Part 77 Notification Area, Airport Influence Area (MCAS-Miramar, Review Area 2), and the Residential Tandem Parking Overlay Zone within the Scripps Miramar Ranch Community Plan area. (LEGAL DESCRIPTION: Portion of Parcel 3, Map No. 20640).

Discretionary Approvals:

Conditional Use Permit, Planned Development Permit, and a Site Development Permit.

EIR Requirements:

The EIR serves to inform governmental agencies and the public of a project's environmental impacts. Emphasis in the EIR must be on identifying feasible solutions to environmental impacts. The objective is not to simply describe and document an impact but to actively create and suggest mitigation measures or project alternatives to substantially reduce the significant adverse environmental impacts. The adequacy of the EIR will depend greatly on the thoroughness of this effort.

The EIR must be written in an objective, clear, and concise manner, in plain language. The Use of graphics is encouraged to replace extensive word descriptions and to assist in clarification. Conclusions must be supported with quantitative, as well as qualitative, information, to the extent feasible.

Prior to the distribution of the draft EIR for public review, Conclusions, which are attached at the front of the draft EIR, will also need to be prepared. The Conclusions cannot be prepared until an approved draft has been submitted and accepted by the City. The EIR shall include a title page that includes the Project Tracking System (PTS) number (264823) and the date of publication. The entire environmental document must be left justified and shall include a table of contents and an executive summary of all of the following sections. Please refer to the "Environmental Impact Report Guidelines," updated December 2005, for additional details regarding the required information.

I. INTRODUCTION

The EIR shall introduce the project with a brief discussion on the intended use and purpose of the EIR. This discussion shall focus on the type of analysis that the EIR is providing and provide an explanation of why it is necessary to implement the project. This section shall describe and/or incorporate by reference any previously certified environmental documents that cover the project site including any EIRs. This section shall briefly describe areas where the proposed project is in compliance or non-compliance with assumptions and mitigation contained in these previously certified documents. Additionally, this section shall provide a brief description of any other local, state and federal agencies that may be involved in the project review and/or any grant approvals.

II. ENVIRONMENTAL SETTING

The EIR shall describe the precise location of the project and present it on a detailed topographic map and regional map. This section shall also include a map of the specific proposal and discuss the existing conditions on the project site and in the project area. In addition, the section shall provide a local and regional description of the environmental setting of the project, as well as the zoning and land use designations of the site and its contiguous properties, area topography, drainage characteristics, and vegetation. It shall include any applicable land use plans such as the City's MSCP/MHPA and other applicable open space preserves or overlay zones that affect the project site, such as the City of San Diego General Plan. The section shall include a listing of any open space easements or building restricted easements that exist on the property. A description of other utilities that may be present on or in close proximity to the site and their maintenance accesses shall also be discussed. This section shall include a brief description of the location of the closest police and fire stations along with their response times.

III. PROJECT DESCRIPTION

The EIR shall include a detailed discussion of the goals and objectives of the proposed project, in terms of public benefit (increase in housing supply, employment centers, etc.). Project objectives will be critical in determining the appropriate alternatives for the project, which would avoid or substantially reduce potentially significant impacts. As stated in CEQA Section 15124 (b), "A clearly written statement of objectives will help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and will aid the decision makers in preparing findings or a statement of overriding consideration, if necessary. The statement of objectives should include the underlying purpose of the project." This section shall describe all discretionary actions needed to implement the project (e.g. Planned Development Permit, Tentative Map, etc.) including all permits required from federal, state, and local agencies. The description of the project shall include all major project features, including density, grading (cut and fill), relocation of existing facilities, land use, retaining walls, landscaping, drainage design, improvement plans, including any off-site improvements, vehicular access points and parking areas associated with the project. The project description shall describe any off-site activities necessary to construct the proposed project. The EIR shall include sufficient graphics and tables to provide a complete description of all major project features. Project phasing also should be described in this section. This discussion shall address the whole of the proposed project

IV. HISTORY OF PROJECT CHANGES

This section of the EIR shall outline the history of the project and any physical changes that have been made to the proposed project in response to environmental concerns raised during the City's review of the project.

VII. ENVIRONMENTAL ISSUES

The potential for significant environmental impacts must be thoroughly analyzed and mitigation measures identified that would avoid or substantially lessen any significant impacts. Since the City of San Diego is the Lead Agency for this project, the EIR must represent the independent analyses of the Environmental Analysis Section (EAS). Therefore, all impact analysis must be based on the City's "Significance Determination Thresholds" dated January 2011. Below are key environmental issue areas that have been identified for this project, within which the issue statements must be addressed individually. Discussion of each issue statement shall include an explanation of the existing project site conditions, impact analysis, significance determination, and appropriate mitigation. The impact analysis shall address potential direct, indirect, and cumulative impacts that could be created through implementation of the proposed project and its alternatives.

Land Use

Issue 1: Would the proposal result in a conflict with the environmental goals, objectives, or recommendations of the General/Community Plan in which it is located?

Issue 2: Would the proposal require a deviation or variance, and the deviation or variance would in turn result in a physical impact on the environment?

Issue 3: Would the proposal conflict with the provisions of the City's MSCP Subarea Plan or other approved local, regional, or state habitat conservation plan?

Issue 4: Would the proposal result in land uses which are not compatible with an adopted Airport Land Use Compatibility Plan (ALUCP)?

This section shall provide a discussion of all applicable land use plans to establish a context in which the project is being proposed. Specifically, it shall discuss how the project implements or fails to implement the goals, objectives, and recommendations of the General Plan, Scripps Miramar Ranch Community Plan, and the MCAS Miramar ALUCP. Ultimately, this section shall identify any inconsistencies between the project as proposed and any adopted land use plan and whether the identified inconsistency would result in a secondary physical environmental impact.

The project site is located within the City of San Diego Multiple Species Conservation Program (MSCP). A portion (4.39 acres) of the project is within the MSCP's Multi-Habitat Planning Area (MHPA) and the majority of the site is adjacent to MHPA. Due to the fact that the CUP supersedes the implementation of the City of Diego's MSCP, dated March 1997, a boundary line correction, per the previously approved CUP boundary, is being requested. With a boundary line correction, 4.39 acres will be corrected out from the MHPA. The section shall include a discussion of the existing MHPA lands on-site (acreage, quality, etc.) and a description of any requested MHPA boundary line correction.

The EIR shall evaluate the project' conformance with the final MSCP Plan (August 1998) and the City's MSCP Subarea Plan (March 2007), with specific attention to the Land Use Adjacency Guidelines (Section 1.4.3) in terms of land use, drainage, toxic substances in runoff, lighting, noise, invasive plant species and brush management requirements for the portions of the proposed development that would lie adjacent

to the MHPA. A description of measures proposed to reduce any identified MHPA edge effects should be included within this section as well.

The section shall provide a listing of all requested deviation(s)/variance(s). For each requested deviation or variance, provide analysis on whether the requested action would then result in a physical impact on the environment.

The section shall provide a discussion/analysis on the surrounding community and whether the project would be compatible with and integrate with the existing community.

Transportation/Circulation/Parking

Issue 1: Would the proposal result in an increase in project traffic which is substantial in relation to the existing traffic load and capacity of the street system?

Issue 2: Would the proposal result in traffic generation in excess of specific community plan allocations?

Issue 3: Would the proposal result in the addition of a substantial amount of traffic to a congested freeway segment, interchange or ramp?

Issue 4: Would the proposal result in a substantial impact upon existing or planned transportation systems

Issue 5: Would the proposed project increase 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)?

A traffic study would be required to analyze and estimate the expected trips the proposed project would create at build-out and document any impacts on intersections, roadways, and freeways. The traffic report would form the basis of the impact analysis for this section of the EIR. The study shall evaluate the traffic volumes and levels of service on circulation element roadways. The traffic study and EIR shall include descriptions and applicable graphics of the conditions during the near term and at project build-out. The cumulative analysis shall incorporate any past, present and reasonably foreseeable future developments in the community that may impact or contribute to local and regional street and circulation systems. This section of the EIR shall also describe any required modifications and/or

improvements to the existing circulation system, including City streets, intersections, freeways, and interchanges. If the project would result in the construction of a roadway which is inconsistent with the General Plan and/or community plan, the impact would be significant if the proposed roadway would not properly align with other existing or planned roadways. The section shall provide a discussion to the extent this may be triggered.

If the project would result in a significant increase in trips, the study and EIR shall describe what measures would be required to mitigate significant traffic circulation impacts. The section shall describe the adequacy of the parking provided and the walkability, pedestrian, and bicycle connectivity within the project and off-site areas.

Air Quality

Issue 1: Would the proposal conflict with or obstruct the implementation of the applicable air quality plan?

Issue 2: Would the proposal result in a violation of any air quality standard or contribute substantially to an existing or projected air quality violation?

Issue 3: Would the proposal exceed 100 pounds per day of particulate Matter (PM) (dust)?

The EIR shall describe the region's climate and the San Diego Air Basin's current attainment levels for state and federal ambient air quality standards. An air quality analysis shall be prepared and included in the appendix to the EIR.

The air quality analysis shall focus on the project's potential air quality impacts and how this would hinder or help the San Diego Air Basin meet the regional air quality strategies. The discussion shall include potential impacts that would occur during the demolition and construction phases of the specific projects that are being proposed at this time, and the operational impacts of the proposed project, assuming maximum build-out.

An analysis of potential stationary and non-stationary air emission sources related to the construction and operation associated with the proposed project and vehicle emission sources should be provided.

The section shall also include a discussion of any short-term, long-term and cumulative impacts the project may have on regional air quality, including construction and transportation-related sources of air pollution.

Biological Resources

Issue 1: **Would the proposal result in 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 California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Services (USFWS)?**

Issue 2: **Would proposal 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?**

Issue 3: **Would the proposal 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?**

Issue 4: **Would the proposal 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?**

Issue 5: **Would the proposal conflict with the provisions of an adopted Habitat Conservation Plan (HCP), Natural Conservation Community Plan (NCCP), or other approved local, regional, or state habitat conservation plan, either within the MSCP plan area or in the surrounding region?**

Issue 6: **Would the proposal introduce a land use within an area adjacent to the MHPA that would result in adverse edge effects?**

Issue 7: **Would the proposal result in the introduction of invasive species of plants into a natural open space area?**

The project site is located within the City of San Diego Multiple Species Conservation Program (MSCP) and is partially located within the MSCP's Multi-

Habitat Planning Area (MHPA). Various sensitive habitat and wetlands could be potentially directly affected or indirectly affected by the project.

A Biological Technical Report is required for the project. The report shall focus on direct, indirect and cumulative impacts resulting from specific project approvals. The report shall be prepared in accordance with the City's Biological Resources Guidelines (April 2012). The analysis within the report shall include the entire development footprint. In addition to the analysis for structures, roads, etc., the report shall also include any associated improvements and staging areas for construction equipment. This section shall analyze all physical changes that may impact sensitive biological resources resulting from project implementation.

This section of the EIR and the biological report must identify any MSCP covered and narrow endemic flora and fauna that exist or have a potential to exist in the area of the proposed development. The direct, indirect, and cumulative impacts to wetland habitat shall be addressed within this section of the EIR. The wetland habitat types shall be graphically delineated, including an adequate buffer to sustain their functionality. If impacts to any wetlands or their buffers are identified, a discussion of the infeasibility of avoiding such impacts with the project shall be included.

Both the biological report and the biological resources section of the EIR shall provide a detailed discussion and mapping of the MHPA and shall address potential adjacency impacts from the proposed project and any proposed mitigation measures.

Energy

Issue 1: Would the construction and operation of the proposal result in the use of excessive amounts of electrical power?

Issue 2: Would the proposal result in the use of excessive amounts of fuel or other forms of energy (including natural gas, oil, etc.)?

Appendix F of the State CEQA Guidelines requires that potentially significant energy implications of a project shall be considered in an EIR to the extent relevant and applicable to the project. Particular emphasis on avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy should be included in this section. The EIR section shall address the estimated energy use for the project and assess whether the project would generate a demand for energy (electricity and/or natural gas) that would exceed the planned capacity of the energy suppliers. A description of any

energy and/or water saving project features should also be included in this section. (Cross-reference with GHG Emissions discussion section as appropriate.) Describe any proposed measures included as part of the project or required as mitigation measures directed at conserving energy and reducing energy consumption. Ensure this section addresses all issues described within Appendix F of the CEQA Guidelines.

Geology/Soils

Issue 1: Would the proposal be located on a geologic unit or soil that is unstable or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

Issue 2: Would the proposal result in a substantial increase in wind or water erosion of soils, either on or off the site?

Issue 3: Would the proposal expose people or property to geologic hazards such as earthquakes, landslides, mudslides, ground failure, or similar hazards?

The project site is located in a seismically active region of California where the potential for geologic hazards, such as earthquakes and ground failures exist. According to the City of San Diego Seismic Safety Study, the project site is located within Geologic Hazard Category 53. A Geologic Investigation is required for the proposed project and the EIR should include a discussion of the information, conclusions and any mitigation measures, if required.

The section shall describe the geologic and subsurface conditions in the project area. It shall describe the general setting in terms of existing topography, geology (surface and subsurface), tectonics and soil types. It shall assess possible impacts to the project from geologic hazards and unfavorable soil conditions. The constraints discussion shall include issues such as the potential for liquefaction, slope instability, and other hazards. Any secondary impacts due to soils/geology mitigation (e.g., excavation of unsuitable soil) shall also be addressed. Additionally, the sections shall provide mitigation, as appropriate, that would reduce the potential for future adverse impacts resulting from on-site soils and geologic hazards.

Greenhouse Gas Emissions

Issue 1: Would the proposal generate greenhouse gas (GHG) emissions, either directly or indirectly, that may have a significant impact on the environment?

Issue 2: Would the proposal conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs?

This section shall present an overview of GHG emissions, including the most recent information regarding the current understanding of the mechanisms behind current conditions and trends, and the broad environmental issues related to global climate change. A discussion of current legislation, plans, policies, and programs pertinent to global climate change shall also be included. The EIR shall provide details of the project's sustainable features such as pedestrian access and orientation, sustainable design and building features, and others that meet criteria outlined in the Conservation Element of the General Plan.

The EIR shall address the project's contribution to GHG emissions. A quantitative analysis addressing the project-generated GHG emissions, as applicable, shall be provided in a GHG emission study summarized in the EIR.

Based on the scope of the project, GHG emissions resulting from both construction activities related to the project and on-going operation of the project must be analyzed. The analysis should include, but is not limited to, the five primary sources of GHG emissions: vehicular traffic, generation of electricity, natural gas consumption/combustion, solid waste generation, and water usage. If the proposed project would result in significant GHG emissions, project features, designs and measures should be identified and incorporated into the project to reduce GHG emissions.

Health and Safety/Hazardous Materials

Issue 1: **Would the proposal result in hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within a quarter-mile of an existing or proposed school?**

Issue 2: **Would the proposal 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 would the project expose people to potential health hazards?**

Issue 4: **Would the proposal impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?**

Issue 5: **Would the proposal 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?

This section of the EIR shall describe the process required to permit any use of hazardous materials and any local, state or federal regulations that would govern any future commercial or industrial uses that would require the handling of hazardous materials for their business operations. The EIR shall describe any existing and recently enacted legislation to protect the public from any potential impacts from the use of hazardous materials. Such legislation includes the Clean Air Act, the Clean Water Act, the Comprehensive Environmental Response, Compensation and Liability Act and the Toxic Substances Control Act.

Additionally, as part of the environmental process, steps are needed to disclose and address the safe removal, disposal, and/or remediation of hazardous materials. There are federal and state requirements that are mandated to be incorporated into a project that may have these issues.

The EIR shall also discuss project effects on emergency routes and access within the project area during and after project construction and potential wildland fire hazards affecting the site.

Historical Resources

Issue 1: Would the proposal 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?

Issue 2: Would the proposal result in any impact to existing religious or sacred uses within the potential impact area?

Issue 3: Would the proposal result in the disturbance on any human remains, including those interred outside of formal cemeteries?

An archaeological survey is required for the proposed project. The report shall include the results of the initial archaeological site survey and literature review. Appropriate graphics, including a map of the Area of Potential Affect (APE), shall be provided. Additional field surveys, as appropriate, shall be completed to address the potential direct, indirect, and cumulative impacts of all project components.

Any newly discovered sites shall be recorded at the South Coastal Information Center at San Diego State University. For sites that are expected to be impacted with project implementation, a testing program shall be conducted to determine site significance in accordance with CEQA and the City's criteria pursuant to the Historical Resources Regulations and Guidelines.

The EIR shall discuss the results of the archaeological survey and testing program that was prepared for the project. The potential for ground disturbing activities to impact archaeological resources shall be determined.

The report shall be included as an appendix; the records search results should be provided under separate cover as a confidential appendix. The EIR shall summarize the results of the report and discuss the need for a research design and a data recovery program to mitigate impacts to sites that are determined to be significant and that would be directly impacted with project implementation.

Hydrology

Issue 1: Would the proposal result in an increase in impervious surfaces and associated runoff?

Issue 2: Would the proposal result in a substantial alteration to on and off-site drainage patterns due to changes in runoff flow rates or volumes?

Issue 3: Would the proposal develop wholly or partially within the 100-year floodplain identified in the FEMA maps or impose flood hazards on other properties.

A portion of this project site located closest to Pomerado Road has been identified as being within the floodway of a Special Flood Hazard Area (San Diego panel 1364) as identified by the Federal Emergency Management Agency (FEMA). This section shall discuss whether project build-out would result in any increase to the base flood elevation. It shall provide a discussion and analysis focusing on the project's impact on the floodway and the floodplain.

Increases in impervious surfaces could potentially result in significant erosion and subsequent sedimentation downstream. A hydrology study is required to address theses issues. The study shall pay particular attention to addressing anticipated changes to existing drainage patterns and runoff volumes affecting adjacent properties.

The Hydrology section should include changes in impervious surfaces and the resulting changes in drainage patterns and their affect on exiting wetlands. A project would generally have a significant impact on biological resources if the project would result in degradation in the function and value of habitat of if the project would alter the habitat type. The Hydrology section doesn't need to include biological mitigation measures, but does need to analyze the linkage between drainage patterns and existing wetlands.

Noise

Issue 1: Would the proposal result in or create a significant increase in the existing ambient noise level?

Issue 2: Would the proposal result in the exposure of people to noise levels which exceed the City's Noise Ordinance or are incompatible with the Noise Compatibility Guidelines (Table NE-3) in the Noise Element of the General Plan?

Issue 3: Would the proposal cause exposure of people to future transportation noise levels which exceed standards established in the General Plan?

Issue 4: Would the proposal result in land uses which are not compatible with aircraft noise levels as defined by an adopted Airport Land Use Compatibility Plan (ALUCP)?

An acoustical analysis, prepared in accordance with the City's Acoustical Report Guidelines, is required to determine if any impacts would occur due to project implementation. The technical report should also discuss any potential for the generation of noise that may affect sensitive biological resources or adjacent properties. In addition, the analysis should describe any potential onsite noise impacts to the sensitive receptors. If significant noise impacts are identified, the report shall include mitigation measures that would mitigate the impacts to below a level of significance.

The analysis in this section of the EIR shall summarize the findings of the acoustical analysis and also provide a discussion on typical sources of noise, measurements of noise, etc., to provide context for the findings of the acoustical analysis. The EIR shall further discuss potential exterior and interior noise impacts as a result of the proposed land uses and estimated traffic volumes on adjacent streets.

Paleontological Resources

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

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

This section of the EIR shall provide a brief introduction to paleontological resources. Due to the amount of grading the project proposes and using the City of San Diego's Paleontological Guidelines discuss the potential for project grading activities to impact fossil resources and identify any proposed mitigation measures for any significant impact. Grading in areas of a moderate to high rating would require paleontological monitoring during grading activities.

Public Services and Facilities

Issue 1: Would the proposal 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; police protection; schools; maintenance of public facilities including roads, parks or other recreational facilities; and libraries which would result is physical impacts?

The EIR shall identify the number, location, and size of public facilities such as fire and police stations, public schools, libraries, parks, and other governmental services and facilities. The EIR shall discuss the project's effect on the need for libraries and identify whether there would be a physical impact due to the need for new facilities.

Public Utilities

Issue 1: Would the proposal result in the need for new systems, or require substantial alterations to existing utilities, the construction of which would create physical impacts (Natural Gas, Water, Sewer, Solid Waste Disposal, Communication Systems)?

Issue 3: Would the proposal result in the use of excessive amounts of water?

Issue 4: Would the proposal result in landscaping which is predominantly non-drought resistant vegetation?

The proposed project would increase the demand on essential public utilities (electrical, natural gas, solar energy, solid waste generation/disposal, water and sewer) and may require new or expanded infrastructure. This section of the EIR shall analyze the demand and supply relationships of various public utilities and discuss how the project would comply with local, state and federal regulations for each public utility and identify any conflicts with existin and planned instrstructure.

Specifically, the EIR should include a Waste Management Plan that must be approved by the City's Environmental Services Department that would address Solid Waste disposal impacts (construction and operational). The EIR shall discuss how this project would contribute cumulatively to the region's solid waste facility capacity and summarize the findings of the Waste Management Plan.

Sewer and/or water pipeline studies shall be performed to determine if appropriate sewer/water facilities are available to serve the development. The analysis and conclusions of the studies shall be included in the EIR.

Senate Bill 610 and 221 requires the evaluation of the availability of water to serve the project for a 20-year planning horizon, including single and multiple dry years. A Water Supply Assessment (WSA) is needed for projects that would require an equivalent amount of water of 500 dwelling units. The project meets this threshold and would therefore require a WSA. In addition to the specific project proposals, CEQA requires that changes in land use require a WSA. Therefore, a WSA shall be prepared the project.

Visual Quality/Neighborhood Character/ Landform Alteration

Issue 1: **Would the proposal result in a substantial obstruction of any vista or scenic view from a public viewing area as identified in the community plan?**

Issue 2: **Would the proposal result in a negative aesthetic site or project?**

Issue 3: **Would the proposal result in bulk, scale, materials, or style which would be incompatible with surrounding development?**

Issue 4: **Would the proposed project cause a substantial alteration to the existing or planned character of the area?**

Issue 5: **Would the proposal result in a substantial change in the existing landform?**

Issue 6: Would the proposal result in substantial light or glare which would adversely affect daytime or nighttime views in the area?

The EIR shall include an analysis of potential impacts to the community character as a result of the proposed development. The EIR shall include a discussion analyzing whether any views to open space would be impacted. Relevant graphics and photo simulations shall be included as appropriate. Identify designated views in close proximity to the proposed site. This section shall analyze whether or not the project would impact any designated view corridors.

Overall, the analysis shall place an emphasis on how project development will appear to viewers from adjacent streets and from public viewing areas from various vantage points within and around the project site.

Also, this section shall include a discussion of the location and size of any retaining walls. A visual impact may occur if retaining walls or noise walls greater than six feet in height and 50 feet in length with minimal landscaping screening or berming are proposed and where the walls would be visible to public are proposed. The section shall provide discussion and any relevant graphics that analyze the number, size and location of any proposed retaining walls.

The EIR shall include an evaluation of the impacts on the natural landforms within the project boundary due to the proposed grading and include the grading quantities (cut and fill) as well as the height of proposed manufactured slopes. In accordance with the City of San Diego's Significance Determination Thresholds, the proposed project may potentially create significant visual impacts in relation to landform alterations. The guidelines include the following in determining landform visual impact: Alteration of more than 2,000 cubic-yards of earth per graded acre; creating manufactured slopes higher than ten feet of steeper than 2:1 (50 percent); or changing the elevation of steep natural slopes (25 percent gradient or steeper) from existing grade to a proposed grade of more than 5 feet by either excavation or fill.

A description of all proposed structures shall also be included within this section of the EIR in terms of their building mass, bulk, height and architectural style. This section shall also include an analysis with respect to lighting and glare.

Water Quality

Issue 1 **Would the proposal result in an increase in pollutant discharge to receiving waters during or following construction? Would the proposal discharge identified pollutants to an already impaired water body?**

Issue 2: **What short-term and long-term effects would the proposal have on local and regional water quality? What types of pre and post-construction Best Management Practices (BMPs) would be incorporated into the proposal to preclude impacts to local and regional water quality?**

A Water Quality Technical Report (WQTR) is required for this project. The report along with the EIR shall discuss how the proposed project could affect water quality within the project area and downstream. This section shall also include the findings and conclusions of the report. This section shall also include examples of BMPs and outline programs that can be used during and post-construction and discuss the project's compliance with the City's Storm Water Standards.

VI. SIGNIFICANT ENVIRONMENTAL EFFECTS WHICH CANNOT BE AVOIDED IF THE PROPOSED PROJECT IS IMPLEMENTED

This section shall describe any significant unavoidable impacts of the project, including those significant impacts that can be mitigated but not reduced to below a level of significance. Provide mitigation measures where appropriate; including triggers, details, responsible entities, and a monitoring and report schedule. Include a sentence on the significance of each impact area discussed, with effect of the proposed mitigation if appropriate. Do not include analysis in this sentence.

VII. SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

In accordance with CEQA Section 15126.2(c), the EIR shall include a discussion of any significant irreversible environmental changes which would be caused by the proposed action should it be implemented. This section shall address the use of nonrenewable resources during the construction and life of the project. See CEQA Section 15127 for limitation on the requirements for this discussion.

VIII. GROWTH INDUCEMENT

The EIR shall address the potential for growth inducement through implementation of the project. The EIR shall discuss the ways in which the project 1) is directly and

indirectly growth inducing (i.e. fostering economic or population growth by land use changes, construction of additional housing, etc.) and 2) if the subsequent consequences (i.e. impacts to existing infrastructure, requirement of new facilities, roadways, etc.) of the growth inducing project would create a significant and/or unavoidable impact, and provide for mitigation or avoidance. Accelerated growth could further strain existing community facilities or encourage activities that could significantly affect the environment. This section need not conclude that growth-inducing impacts if any are significant unless the project would induce substantial growth or concentration of population.

IX. CUMULATIVE IMPACTS

In accordance with CEQA Section 15130, potential cumulative impacts shall be discussed in a separate section of the EIR. This section shall include all existing and pending development proposals, including those undergoing review with the Development Services Department. The discussion shall address the potential cumulative effects related to each environmental resources area that should be discussed in the EIR as outlined above.

The EIR shall summarize the overall short-term and long-term impacts this project could have in relation to other planned and proposed projects. When this project is considered with other past, present and reasonably foreseeable probable future projects within close proximity, would the proposed project result in significant environmental changes that are individually limited but cumulatively considerable? If incremental impacts do not rise to the level of cumulatively significant the Draft EIR shall make a statement to that extent.

X. EFFECTS FOUND NOT TO BE SIGNIFICANT

A separate section of the EIR shall include a brief discussion of why certain areas were not considered to be potentially significant and were therefore not included in the EIR.

XI. ALTERNATIVES

The EIR should place major attention on reasonable alternatives that avoid or mitigate the project's significant environmental impacts. The alternatives should meet the project objectives. Therefore, a discussion of the project's objectives should be included in this section. In addition to meeting the project's objectives, the alternatives should substantially lessen one or more significant environmental effect and should be feasible.

The EIR shall place major attention on reasonable alternatives that avoid or reduce the project's significant environmental impacts while still achieving the stated project objectives. Therefore, a discussion of the project's objectives should be included in this section. The alternatives should be identified and discussed in detail and should address all significant impacts. Refer to Section 15364 of the CEQA Guidelines for the CEQA definition of "feasible."

This section should provide a meaningful evaluation, analysis, and comparison of alternatives' impacts to those of the proposed project (matrix format recommended). These alternatives should be identified and discussed in detail and should address all significant impacts. The alternatives analysis should be conducted with sufficient graphics, narrative and detail to clearly assess the relative level of impacts and feasibility. Issues to consider when assessing "feasibility" are site suitability, economic viability, availability of infrastructure, general plan consistency, other regulatory limitations, jurisdictional boundaries and the applicant's control over alternative sites (own, ability to purchase, etc.).

Preceding the detailed alternatives analysis, provide a section entitled "Alternatives Considered but Rejected." This section should include a discussion of preliminary alternatives that were considered but not analyzed in detail. The reasons for rejection must be explained in detail and demonstrate to the public the analytical route followed in rejecting certain alternatives. At a minimum, the following alternatives should be considered: No Project; Development per the existing residential zone, Development per the master plan, Reduced Density/Intensity.

If, through the environmental analysis, other alternatives become apparent that would mitigate potential impacts, these should be discussed with EAS staff prior to including them in the Draft EIR. It is important to emphasize that the alternatives section of the EIR should constitute a major part of the report. The timely processing of the environmental review will likely be dependent on the thoroughness of effort exhibited in the alternative analysis.

10. MITIGATION MONITORING AND REPORTING PROGRAM (MMRP)

Mitigation measures should be clearly identified and discussed and their effectiveness assessed in each issue section of the EIR. A Mitigation, Monitoring, and Reporting Program (MMRP) for each issue area with significant impacts is mandatory and projected effectiveness must be assessed (i.e., all or some CEQA impacts would be reduced to below a level of significance, etc.). At a minimum, the MMRP should identify: 1) the department responsible for the monitoring; 2) the

monitoring and reporting schedule; and 3) the completion requirements. In addition, mitigation measures and the monitoring and reporting program for each impact should also be contained (verbatim) to be included within the EIR in a separate section and a duplicate separate copy (Word version) must also be provided to EAS.

11. REFERENCES

Material must be reasonably accessible. Use the most up-to-date possible and reference source document.

12. INDIVIDUALS AND AGENCIES CONSULTED

List those consulted in preparation of the EIR. Seek out parties who would normally be expected to be a responsible agency or an interest in the project.

13. CERTIFICATION PAGE

Include City and Consulting staff members, titles, and affiliations.

14. APPENDICES

Include the EIR Notice of Preparation (NOP), Scoping Meeting Notice, and comments on the NOP and Scoping Meeting (Scoping Meeting verbal transcript). Include all accepted technical studies.

Conclusion:

If other potentially significant issue areas arise during detailed environmental investigation of the project, consultation with this division is required to determine if these other areas need to be addressed in the EIR. Should the project description be revised, an additional scope of work may be required. Furthermore, as the project design progresses and supplementary information becomes available, the EIR may need to be expanded to include additional issue areas.

It is important to note that timely processing of your project will be contingent in large part on your selection of a well-qualified consultant. Prior to starting work on the EIR, a meeting between the consultant and EAS will be required to discuss and clarify the scope of work. Until the screencheck for the draft EIR is submitted, which addresses all of the above issues, the environmental processing timeline will be held in abeyance.

Should you have any questions, please contact the environmental analyst, Elizabeth Shearer-Nguyen at (619) 446-5369.

Sincerely,

Cathy Winterrowd
Assistant Deputy Director
Development Services Department

EN:en

Enclosures: City of San Diego Technical Report and Environmental Impact Report Guidelines

cc: John Fisher, Development Project Manager
EAS Project File