



THE CITY OF SAN DIEGO

DEVELOPMENT SERVICES DEPARTMENT
Date of Notice: July 17, 2013
PUBLIC NOTICE OF PREPARATION OF A
DRAFT ENVIRONMENTAL IMPACT REPORT
SAP No.: 24003475

PUBLIC NOTICE: The City of San Diego will be the Lead Agency and will prepare a draft Environmental Impact Report in compliance with the California Environmental Quality Act (CEQA). This Notice of Preparation of an Environmental Impact Report was publicly noticed and distributed on July 17, 2013. This notice was published in the SAN DIEGO DAILY TRANSCRIPT and placed on the City of San Diego website at the following location on July 17, 2013, <http://sandiego.gov/city-clerk/officialdocs/notices/>.

SCOPING RESPONSE: Written comments should be sent to Anna L. McPherson, AICP, City of San Diego Development Services Center, 1222 First Avenue, MS 501, San Diego, CA 92101 or emailed to DSDEAS@sandiego.gov referencing the Project Name and Number in the subject line within 30 days of the receipt of this notice. Responsible agencies are requested to indicate their statutory responsibilities in connection with this project when responding. A draft Environmental Impact Report incorporating public input will then be prepared and distributed for public review and comment.

PROJECT NAME/NO: Marian Catholic Property Residential Project/307088

SCH No.: (pending)

COMMUNITY PLAN AREA: Otay Mesa-Nestor

COUNCIL DISTRICT: 8 (Alvarez)

SUBJECT: AMENDMENT to the Otay Mesa-Nestor Community Plan to change the existing land use designation from School to Low-Medium Density Residential, REZONE from Residential-Single Unit (RS-1-7) to Residential-Multiple Unit (RM-1-2), VESTING TENTATIVE MAP, MASTER PLANNED DEVELOPMENT PERMIT, and PUBLIC FACILITIES FINANCING PLAN AMENDMENT. The proposed project would involve the demolition of the existing buildings on the 18-acre project site to develop 197 single family dwelling units. The development would include the construction of three housing types: Homes, Commons, and Paseo. The Homes are single-family detached residences that would be set on the

largest lots, with lot sizes ranging from approximately 2,583 square feet (sf) to 3,216 sf. The Paseo single-family homes are characterized as being more compact that have rear garage vehicular access from an alley. The Paseo lot size ranges from approximately 2,320 sf to 2,436 sf. The Commons are single-family homes characterized by shared motor court driveways and would be set on the smallest lots within the project site. The Commons lot size ranges from approximately 1,906 sf to 2,080 sf. The development would include the construction of 64 Homes units, 93 Commons units, and 40 Paseo units.

APPLICANT: MCP Ventures, LLC, 8799 Balboa Avenue, Suite 270, San Diego, CA 92123.

RECOMMENDED FINDING: Pursuant to Section 15060(d) of the CEQA Guidelines, it appears that the proposed project could potentially result in significant environmental impacts in the following areas: Land Use – Consistency with the Noise Element, Transportation, Noise, Air Quality, Greenhouse Gas Emissions, and Aesthetics.

AVAILABILITY IN ALTERNATIVE FORMAT: To request this Notice in an alternative format, call the Development Services Department at (619) 446-5460 immediately to ensure availability. This information is also available in alternative formats for persons with disabilities. To request this Notice in an alternative format, call (619) 446-5446 or (800) 735-2929 (TEXT TELEPHONE).

ADDITIONAL INFORMATION: For information on environmental review and/or information regarding this project, contact Anna McPherson at (619) 446-5276. 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 Sandra Teasley, Project Manager, at (619) 446-5271. This notice was published in the SAN DIEGO DAILY TRANSCRIPT, placed on the City of San Diego website <http://sandiego.gov/city-clerk/officialdocs/notices/> and distributed on July 17, 2013.

Cathy Winterrowd, Interim Deputy Director
Development Services Department

DISTRIBUTION: Attached

ATTACHMENTS: Figure 1. Project Vicinity Map
Figure 2. Project Location Map
Figure 3. Site Plan
Figure 4. Scoping Letter

DISTRIBUTION:

State of California

Department of Transportation, District 11
Department of Toxic Substance Control
California Regional Water Quality Control Board: Region 9
State Clearinghouse
Air Resources Board
Office of Planning and Research
California Transportation Commission

County of San Diego

Air Pollution Control District
Department of Planning and Land Use/Environmental Planning Section

City of San Diego

Mayor's Office
Councilmember Alvarez, District 8
City Attorney's Office
Development Services Department
 Tom Tomlinson, Interim Director
 Cathy Winterrowd, Interim Deputy Director
 Development Project Manager
 Transportation Review
 Long Range Planning
 Water and Wastewater Review
Fire and Life Safety Services
Police
Environmental Services Department
Library Department – Government Documents
Central Library
Otay Mesa – Nestor Branch Library

Other Interested Agencies, Organizations, and Individuals

Otay Mesa Nestor Community Planning Group
San Ysidro Planning and Development Group
Rose Krejci

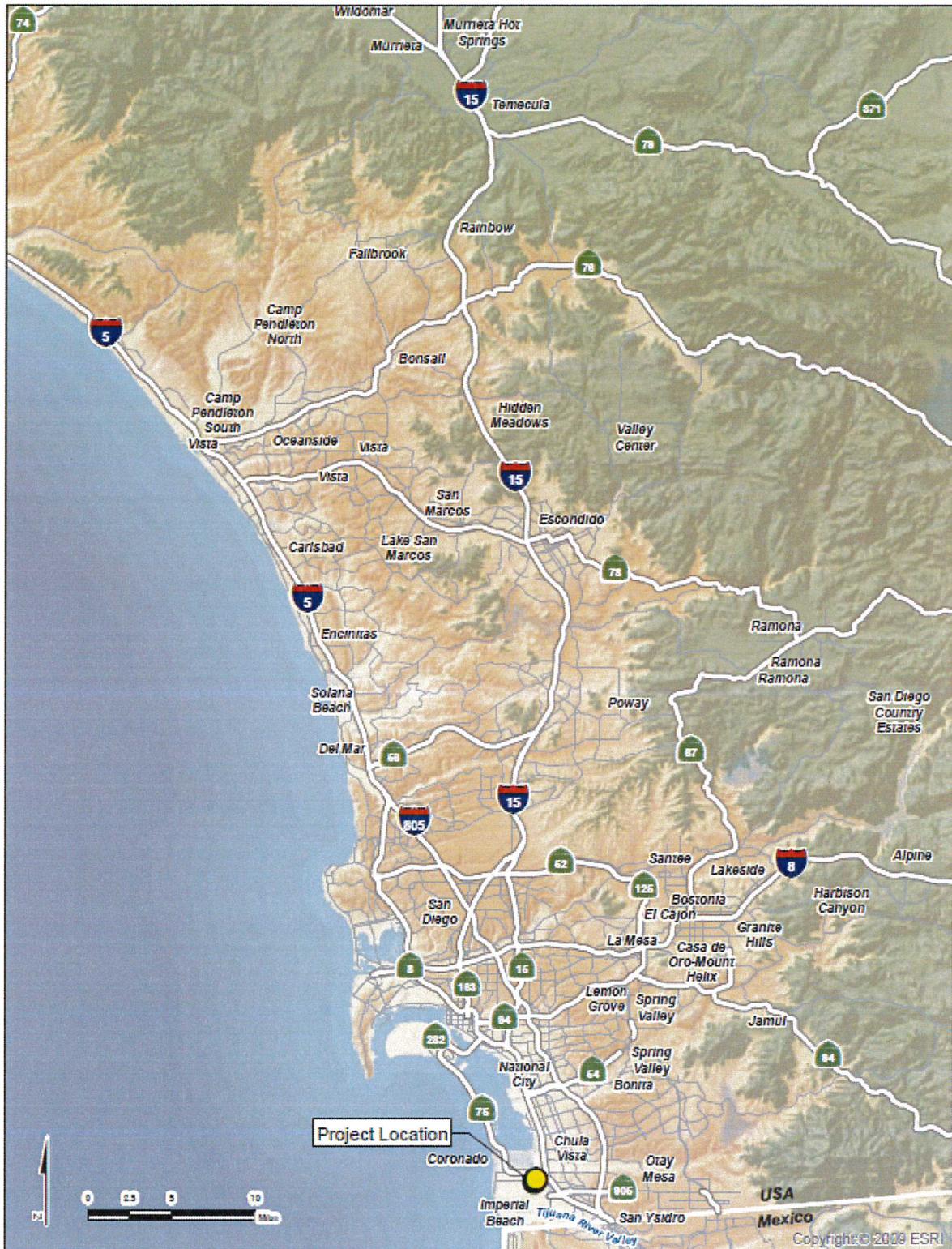


Figure 1. Project Vicinity Map

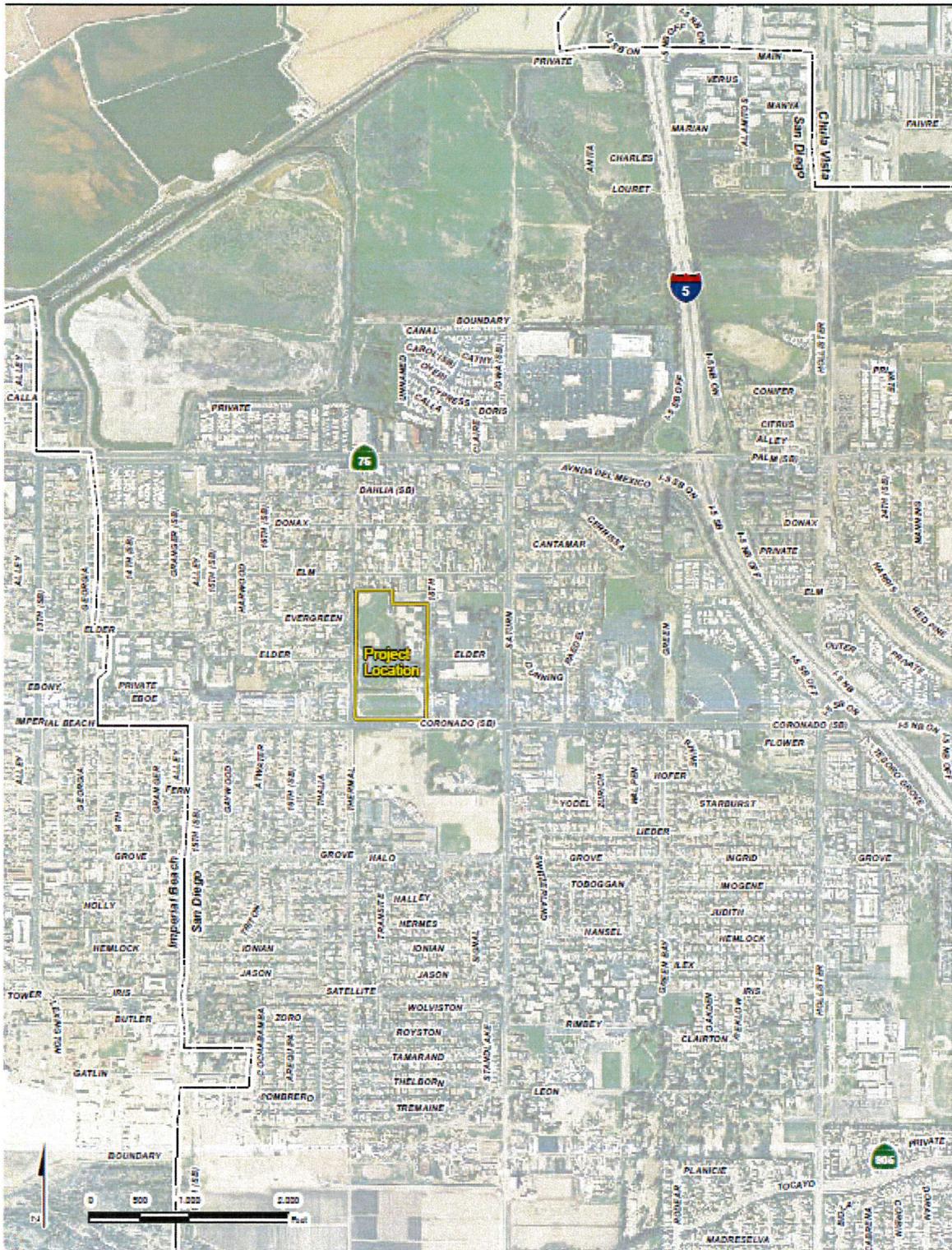


Figure 2. Project Location Map



THE CITY OF SAN DIEGO

July 17, 2013

Mr. Max Stewart
MCP Ventures, LLC
8799 Balboa Avenue, Suite 270
San Diego, CA 29123

**SUBJECT: SCOPE OF WORK FOR AN ENVIRONMENTAL IMPACT REPORT FOR
THE MARIAN CATHOLIC PROPERTY RESIDENTIAL PROJECT,
PROJECT NO. 307088**

Dear Mr. Stewart:

Pursuant to Section 15060 (d) of the California Environmental Quality Act (CEQA), the Environmental Analysis Section (EAS) of the City's Development Services Department (DSD) has determined that the proposed project may have significant effects on the environment, and the preparation of a draft Environmental Impact Report (EIR) is required.

The purpose of this letter is to identify the specific issues to be addressed in the EIR. The EIR should be prepared in accordance with the attached "City of San Diego Technical Report and Environmental Impact Report Guidelines" (Updated May 2005). A Notice of Preparation will be distributed to the Responsible Agencies and others who may have an interest in the project. Changes or additions to the scope of work may be required as a result of input received in response to the Notice of Preparation. In addition, the project may be adjusted over time by the applicant, and those changes would be disclosed in the EIR.

Each section/issue area of the EIR should provide a descriptive analysis of the project followed by a comprehensive evaluation of the issue area. The EIR should also include sufficient graphics and tables to provide a complete description of all major project features. 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 does not meet this threshold, and therefore, no scoping meeting is required for the project.

The Project that will be the subject of the EIR is briefly described as follows:

Project Location: The project is proposed on the former Marian Catholic High School campus located at 1002 18th Street within the Otay Mesa-Nestor community in the City of San Diego. The project site encompasses approximately 18-acres of land bounded by low-medium density residential development to the north, 18th Street to the east, Coronado Avenue to the south, and Thermal Avenue (17th Street) to the west. The project site is zoned Residential-Single Unit (RS-1-7) and designated "School" in the Otay Mesa-Nestor Community Plan.

Project Description: The proposed project would involve the construction of a 197-unit single family residential development on an 18-acre site. The development would include the construction of three housing types: Homes, Commons, and Paseo. The Homes are single-family detached residences that would be set on the largest lots, with lot sizes ranging from approximately 2,583 square feet (sf) to 3,216 sf. The Paseo single-family homes are characterized as being more compact that have rear garage vehicular access from an alley. The Paseo lot size ranges from approximately 2,320 sf to 2,436 sf. The Commons housing type are single-family homes characterized by shared motor court driveways and would be set on the smallest lots within the project site. The Commons lot size ranges from approximately 1,906 sf to 2,080 sf. The development would include the construction of 64 Homes units, 93 Commons units, and 40 Paseo units. The project is proposed to be developed in three phases. Phase 1 would include demolition and grading of the project site, street improvements, open space and landscape buffer zone improvements, parks and open space, and the construction of the Paseo residential homes. Phase 2 would include the construction of the Commons residential homes, completion of private driveways, and open space improvements. Phase 3 would include the construction of the Homes, private driveway completion and improvements, and open space improvements.

Access. The project site is accessed regionally via Interstate 5 and Interstate 805 freeways, which are located ¾-mile east of the site via Coronado Avenue and Palm Avenue. Access to the proposed residential development would be provided via Thermal Avenue and 18th Street. From 18th Street, the project can be accessed via proposed Street "J" and Street "M," which extends westerly until it meets Street "B." From Thermal Avenue, the project can be accessed from Elder Avenue.

Discretionary Actions. The proposed Marian Catholic Properties Residential Project involves an Amendment to the Otay Mesa-Nestor Community Plan to change the existing land use from School to Low-Medium Density Residential with a density range of 10-15 dwelling units per acre; a Rezone from RS-1-7 to RM-1-2; a Vesting Tentative Map; a Public Facilities Financing Plan Amendment; and a Master Planned Development Permit.

EIR FORMAT – THE KEY ELEMENTS

Emphasis in the EIR must be on identifying feasible solutions to environmental problems. 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 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. Use graphics 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.

EIR CONTENT

Prior to public review, EAS will prepare Conclusions to be attached at the front of the Draft EIR (DEIR), but these cannot be prepared until an approved draft has been submitted to the City. The EIR shall include a title page including the LDR and PTS numbers and the date of publication. The entire EIR must be left justified and shall include a table of contents and an executive summary of the following sections:

1. INTRODUCTION

Introduce the purpose of the project with a brief discussion of the intended use and purpose of the EIR. Discuss how the EIR may be used as the basis for subsequent approvals and/or subsequent environmental documents, as appropriate; and describe the parameters for such future use of the EIR.

2. ENVIRONMENTAL SETTING

Describe the precise location of the project with an emphasis on the physical features of the site and the surrounding area and present it on a detailed topographic map and a regional map. Provide a local and regional description of the environmental setting of the project. Describe any upcoming changes to the area and any cumulative changes that may relate to the project site. Include the existing and planned land uses in the vicinity, on-and off-site resources, the community plan area land use designation(s), whether or not the project is located within the Multi-Habitat Planning Area (MHPA), existing zoning, all utility easements and any required maintenance access, and any overlay zones within this section. Provide a recent aerial photo of the site and surrounding uses, and clearly identify the project location.

3. PROJECT DESCRIPTION

Per CEQA Guideline Section 15124, discuss the goals and objectives and major features of the project. Describe all the discretionary actions involved in the project. List and explain the requirements for permits or approvals from federal, state, and local agencies. Describe the proposed project's components, including the proposed Community Plan Amendment, Rezone, Vesting Tentative Map, Master Planned Development Permit; proposed grading; and a detailed description of the parking, circulation, landscaping, utility improvements, and any off-site improvements associated with the project. Project phasing also should be discussed in this section.

4. HISTORY OF PROJECT CHANGES

Chronicle the physical changes that have been made to the project in response to environmental concerns raised during the City's review of the project.

5. ENVIRONMENTAL IMPACT ANALYSIS

This section shall analyze those environmental categories having a potential for adverse environmental impacts, either because of the project's effect on the existing conditions, or the effect of existing conditions on the project. The draft EIR must include a complete discussion of the existing conditions, thresholds, impact analysis, significance, and mitigation for all the environmental issue sections. The EIR must represent the independent analysis of the Lead Agency. The City's current CEQA Significance Determination Thresholds (2011) are to be used to establish significant effects unless otherwise directed by the City.

In general, the EIR should discuss all potential direct and indirect impacts associated with each environmental issue area listed below. These environmental issue areas are listed in order of anticipated magnitude of significance. Lastly, the EIR should summarize each required technical study or survey report within each respective issue section, and all requested technical reports must be included as the appendices to the EIR and summarized in the text of the document.

In each environmental issue section, mitigation measures to avoid or substantially lessen impacts must be clearly identified and discussed. The ultimate outcome after mitigation should also be discussed (i.e., significant but mitigated, significant and unmitigated). If other potentially significant issue areas arise during detailed environmental investigation of the project, consultation with the Development Services Department is required to determine if these areas need to be added to the EIR. As supplementary information is required, the EIR may also need to be expanded.

Land Use

Issue 1: Would the project require a deviation or variance, and the deviation or variance would in turn result in a physical impact on the environment?

Issue 2: Would the project result in a conflict with the environmental goals, objectives and recommendations of the General Plan and/or community plan in which it is located?

Issue 3: Would the project physically divide an established community?

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

As indicated under Project Description, the proposed project includes a Community Plan Amendment, Rezone, Vesting Tentative Map, and Master Planned Development Permit. The EIR shall evaluate consistencies/inconsistencies (including all deviations, variances, etc.) with local, state, and federal regulations (i.e., the City's General Plan, Otay Mesa-Nestor Community Plan, and the City of San Diego Land Development Code). If the project is found to be inconsistent with any adopted land use plans, the EIR would disclose and analyze any physical effects that may result from the inconsistency that could be considered significantly adverse.

The site is not located within or adjacent to any Multi-Habitat Planning Area of the Multiple Species Conservation Program (MSCP), therefore, no land use conflicts with the MSCP Subarea Plan are anticipated. This shall be disclosed and discussed in the Land Use section of the EIR.

The project site is located in the Otay Mesa-Nestor community and the land uses within the immediate vicinity of the project site include low-medium density residential, religious facilities, commercial/retail, and a school. The EIR shall address the project site's location and the surrounding area to establish that the proposed project will not result in physically dividing the community.

The project site is located within the Airport Influence Area (AIA) for Brown Field. A determination of consistency with the Airport Land Use Plan will be required (by the San Diego County Regional Airport Land Use Commission (ALUC)). Also, the project site is located in proximity to the Naval Outlying Field Imperial Beach Airport. The EIR shall evaluate the compatibility of proposed uses with these two airports and adopted plans associated with each airport.

Transportation/Circulation/Parking

Issue 1: Would the project result in traffic generation in excess of specific community plan allocation?

Issue 2: Would the project result in an increase in projected traffic which is substantial in relation to the existing traffic load and capacity of the street system?

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

Issue 4: Would the project result in an increased demand for off-site parking?

Issue 5: Would the project affect existing parking?

Issue 6: Would the project have a substantial impact upon existing or planned transportation systems?

Issue 7: Would the project result in substantial alterations to present circulation movements including effects on existing public access to beaches, parks, or other open space areas?

Issue 8: Would the project 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)?

Issue 9: Would the project conflict with adopted policies, plans or programs supporting alternative transportation modes (e.g., bus turnouts, bicycle racks)?

The proposed project will increase traffic volumes and has the potential to result in direct and cumulative impacts on the surrounding local circulation network (segments and intersections). Therefore a traffic impact analysis shall be prepared for this project to the satisfaction of the City Engineer.

This section will describe any required modifications and/or improvements to the existing circulation system, including City streets, intersections, freeways, and interchanges required as a result of the proposed project. Provide an analysis of any potential impacts of the construction of the required traffic improvements. Discuss any potential traffic impacts on the Otay Mesa-Nestor community, as well as adjacent communities (if applicable). Also, discuss how the proposed uses would affect the overall traffic generated by the project. Address cumulative traffic impacts including any future development in the Otay Mesa-Nestor community. Note the assumption of traffic conditions at build-out. Describe the adequacy of proposed parking and the pedestrian connectivity of planned facilities within the project, both internally and externally. Describe how any proposed pedestrian and bicycle access would or would not connect with off-site circulation elements and why. Address emergency access in light of the modifications to the existing street system that are proposed. Provide an analysis of potential conflicts with adopted policies, plans or programs supporting alternative transportation modes.

The EIR shall present mitigation measures that are required to reduce impacts. Discuss if those measures will mitigate impacts to below a level of significance. If the project results in traffic impacts, which cannot be mitigated to below a level of significance, the Alternatives section of the EIR should include a project alternative that will avoid or further reduce traffic impacts.

The EIR shall provide an evaluation of the parking needs for the project and if the project would result in a shortage of parking spaces based on City requirements. The EIR shall analyze the project's proposed use of existing on-street parking and whether there is sufficient on-street parking available to serve the project. This shall be disclosed and discussed in the Traffic/Circulation section of the EIR.

The EIR shall provide an evaluation of the potential to create hazards for motor vehicles, bicyclists or pedestrians. Traffic control and lane configurations are recommended at the Project access intersections. The improvements would be designed consistent with the City's roadway standards and therefore no hazards are anticipated. This shall be disclosed and discussed in the Traffic/Circulation section of the EIR.

The EIR shall also discuss potential conflicts with adopted policies, plans or programs supporting alternative transportation modes.

Noise

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

Issue 2: Would the project expose people to noise levels which exceed the City's adopted noise ordinance or are incompatible with the City of San Diego General Plan Land Use – Compatibility Guidelines?

Issue 3: Would the project expose people to future transportation noise levels which exceed standards established in the Transportation Element of the General Plan or an adopted airport Comprehensive Land Use Plan?

Issue 4: Would the project result in land uses which are not compatible with aircraft noise levels as defined by an adopted airport Comprehensive Land Use Plan (CLUP)?

The project would result in increases of on-site and off-site traffic, resulting in a corresponding increase in traffic noise. Additionally, the project site may be subject to noise associated with aircraft operations at Brown Field and Naval Outlying Field Imperial Beach Airport.

Prepare a noise study in accordance with the City's "Acoustical Report Guidelines." The report must assess the effects of existing and projected transportation noise levels on required exterior

usable areas and interior areas. Where adverse impacts, as a result of the project, are identified, adequate noise attenuation features (i.e., setbacks, use of double-paned glass, noise walls/berms and other noise attenuation techniques) must be provided. Include tables within the noise study, which show the existing and future noise levels of dBA and any increased noise levels over dBA in 5 dBA increments along affected roads.

The EIR should discuss how the project would conform, through noise attenuation features and/or site planning, to the City of San Diego Municipal Code Noise and Abatement Control Ordinance §59.5.01 and the General Plan. Additionally, construction noise may impact surrounding uses and the EIR should include a discussion regarding this potential impact.

The EIR shall discuss whether the proposed land uses are compatible with aircraft noise from the Brown Field and Naval Outlying Field Imperial Beach Airport. The EIR shall include an analysis of the noise levels as defined by the adopted CLUP for Brown Field and Naval Outlying Field Imperial Beach Airport.

Air Quality

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

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

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

The construction and operation phases of the project have the potential to affect air quality. Construction can create short-term air quality impacts through equipment use, ground-disturbing activities, architectural coatings, and worker automotive trips. Air quality impacts resulting from the operation of the project would be primarily generated by increases in automotive trips. An air quality analysis must be prepared which discusses the project's impact on the ability to meet state, regional, and local air quality strategies/standards, as well as any health risks associated with construction.

Describe the project's climatological setting within the San Diego Air Basin and the basin's current attainment levels for the State and Federal Ambient Air Quality Standards. Discuss short- and long-term and cumulative impacts on regional air quality, including construction and operational-related sources of air pollutants. Discuss the potential impacts from the increase in trips to the Regional Air Quality Standards, and the overall air quality impacts from such trips, and any proposed mitigation measures. Should the project result in a significant decrease in the levels of service of any roadway or intersection in the vicinity of a sensitive receptor, address the potential degradation of air quality, which may result, including the possibility of "hot spots"

within the area. Also include a discussion of potential dust generation during construction within this section of the document, together with any proposed dust suppression measures that would avoid or lessen dust related impacts to sensitive receptors within the area.

Greenhouse Gas Emissions (GHG)

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

Issue 2: Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing emissions of greenhouse gases?

The EIR shall present an overview of greenhouse gases (GHG) 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 domestic legislation, plans, policies, and programs pertinent to global climate change shall also be included.

Construction and operation phases of the project have the potential to affect air quality. Construction can create short-term greenhouse gas emissions through equipment use, ground-disturbing activities, architectural coatings, and worker automotive trips, etc. A quantitative analysis addressing the project-generated GHG emissions shall be provided in a GHG emissions analysis and summarized in the EIR. The analysis shall include, but not be limited to, the primary sources of GHG emissions associated with the project: vehicular traffic, generation of electricity, natural gas consumption/combustion, solid waste generation and water usage. The City of San Diego has not adopted a formal Thresholds of Significance for CEQA for GHG emissions. Therefore, in accordance with amendments to the state CEQA Guidelines regarding analysis of greenhouse gas emissions, the City of San Diego is utilizing the California Air Pollution Control Officers Association (CAPCOA) report "CEQA & Climate Change" dated January 2008 as an interim guideline to determine whether a GHG analysis would be required. The CAPCOA report references the 900 metric ton guideline as a conservative threshold for requiring further analysis and mitigation. Therefore, the project will be analyzed to determine whether it exceeds the 900 metric ton screening threshold. If so, a GHG analysis technical report shall be prepared and will be included as an appendix to the EIR. The EIR shall summarize the results of the report, including identification of the net GHG emissions identified. In addition, the project may also be required to implement project features to reduce the emission by 28.3 percent (consistent with the 2020 "Business-As-Usual" methodology used in the California Air Resources Board [CARB] Scoping Plan). Furthermore, this section of the EIR should also provide an analysis of how the project is consistent with the Conservation Element of the General Plan. More specifically, staff suggests referring to the Climate Change portion of the

Conservation Element (Table CE-1, Issues Related to Climate Change Addressed in the General Plan).

Visual Quality/Neighborhood Character

Issue 1: 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?

Issue 2: Would the project result in the creation of a negative aesthetic site or project?

Issue 3: Would the project's bulk, scale, materials, or style be incompatible with surrounding development?

Issue 4: Would the project result in substantial alteration to the existing or planned character of the area, such as could occur with the construction of a subdivision in a previously undeveloped area?

Issue 5: Would the project result in the loss of any distinctive or landmark tree(s), or stand of mature trees as identified in the community plan? (Normally, the removal of non-native trees within a wetland as part of a restoration project would not be considered significant).

Issue 6: Would the project result in a substantial change in the existing landform?

Issue 7: Would the project create substantial light or glare which would adversely affect daytime or nighttime views of the area?

The 18-acre project site is currently occupied by the vacated Marian Catholic High School. Currently there are the previously used administration buildings and classrooms, athletic field, recreational courts, gymnasium building, surface parking lot, and football field/sports field located on the project site. In addition to the view corridors and view and access points identified adjacent to the project site, the proposed project would introduce new sources of light and glare. Therefore, development of the project has the potential to affect visual quality and the character of the developing community.

Provide an evaluation of the Visual Quality/Neighborhood Character (Aesthetics) changes due to the proposed project. Describe the proposed structures in terms of building mass, bulk, height, and architecture in the context of the surrounding development and existing and planned character of the area. Describe or state how the project will comply with the City's development regulations for the zone. Describe how the character of the surrounding area would be affected with development of the project.

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 in 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 2: Would the proposal result in the use of excessive amounts of water?

Issue 3: 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 existing and planned infrastructure.

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.

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.

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. 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.

6. CUMULATIVE EFFECTS

When the project is considered with other past, present, and reasonable foreseeable future projects in the project area, implementation could result in significant environmental changes, which are individually limited but cumulatively considerable. Therefore, in accordance with Section 15130 of the CEQA Guidelines, potential cumulative impacts must be discussed in a separate section of the EIR.

7. GROWTH INDUCEMENT

Issue 1: Would the project induce substantial population growth in an area, (for example, by proposing new homes and commercial or industrial businesses beyond the land use density/intensity envisioned in the community plan)?

Issue 2: Would the project substantially alter the planned location, distribution, density, or growth rate of the population of an area?

Issue 3: Would the project include extensions of roads or other infrastructure not assumed in the community plan or adopted Capital Improvements Project list, when such infrastructure exceeds the needs of the project and could accommodate future developments?

Growth Inducement is a mandatory EIR issue section that would require a twofold discussion. The analysis should conclude: 1) how the project 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.

Address the potential for growth inducement through implementation of the proposed project. 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.

8. MITIGATION MEASURES

Mitigation measures should be clearly identified and discussed. 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 to separate issue area mitigation discussions, a consolidated, stand alone, verbatim, all issue area MMRP should also be included in the EIR in a separate section and a duplicate separate copy must also be provided to EAS.

9. EFFECTS NOT FOUND TO BE SIGNIFICANT

Provide a discussion of the environmental issue areas that were determined not to be significant and describe the reasons for this determination. For the Marian Catholic Site Properties Residential Project, these include agricultural and forestry resources, biological resources, geologic conditions, health and safety, historical resources (architectural and archeological), hydrology, mineral resources, paleontological resources, and population/housing. If issues related to these areas or other potentially significant issue areas arise during the detailed environmental investigation of the project, consultation with EAS is recommended to determine if subsequent issue area discussions need to be added to the EIR. Additionally, as supplementary information is submitted (such as with the technical reports), the EIR may need to be expanded to include these or other additional use areas.

10. NEW INFORMATION/PROJECT AMENDMENTS

If the project description changes, and/or supplementary information become available, the EIR may need to be expanded to include additional issue areas. This must be determined in consultation with EAS staff.

11. MANDATORY DISCUSSION AREAS

In accordance with CEQA Section 15126, the EIR must include a discussion of the following issue areas:

- A. Any significant environmental effects that cannot be avoided if the proposed project is implemented. Include impact threshold criteria used. 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.
- B. Any significant irreversible environmental changes that would result from the implementation of the proposed project.

12. ALTERNATIVES

The EIR must place major attention on reasonable alternatives that avoid or mitigate the project's significant impacts. These alternatives should be identified and discussed in detail and should address all significant impacts. The alternatives analysis should be conducted in sufficient detail

to clearly assess the relative level of impacts and feasibility. See Section 155364 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 must demonstrate to the public the analytical route followed in rejecting certain alternatives.

The proposed project and project alternatives should consider the ability of each alternative to meet the project objectives while reducing significant environmental impacts. The following alternatives at a minimum must be considered: No Project/Community Plan Compliant Alternative and the Reduced Development Alternative (this could include variations related to a reduction in density/intensity or a smaller development footprint).

If through the environmental analysis process, other alternatives become apparent which would mitigate potentially significant impacts; these alternatives must be discussed with EAS staff prior to including them in the 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.

13. REFERENCES

Material must be reasonably accessible. Use the most up-to-date references possible and include references to all source documents.

14. INDIVIDUALS AND AGENCIES CONSULTED

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

15. CERTIFICATION PAGE

Include City and Consulting staff members, titles and affiliations.

16. APPENDICES

Include the NOP and responses to the Notice. Include all accepted technical studies.

Prior to starting work on the EIR, it is recommended that we meet with your staff to discuss this proposed scope of work and the environmental review process. Please contact Anna McPherson, Environmental Planner, at (619) 446-5276, if you have any questions regarding the CEQA analysis; or Sandra Teasley, Project Manager, at (619) 446-5271, for general questions regarding the proposed project.

Sincerely,

A handwritten signature in blue ink, appearing to read "Cathy Winterrowd". The signature is fluid and cursive, with a long horizontal stroke at the end.

Cathy Winterrowd
Interim Deputy Director
Development Services Department

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