FINAL
ENVIRONMENTAL IMPACT REPORT (Volume 3)

Mount Etna Community Plan Amendment and Rezone Project

SCH No. 2018091016

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LIST OF ACRONYMS AND ABBREVIATIONS

AB	Assembly Bill
AC	Alternating current
ADA	American with Disabilities Act
ADT	Average Daily Traffic
ALUCP	Airport Land Use Compatibility Plan
APCD	Air Pollution Control District
ATCM	Air Toxic Control Measure
AQMD	Air Quality Management Districts
AQMP	Air Quality Management Plan
ARB	Air Resources Board
BACT	Best Available Control Technology
BAU	Business as Usual
BMPs	Best Management Practices
BOS	San Diego County Board of Supervisors
C&D	construction and demolition
CA	California
CAA	Clean Air Act
CAAA	Clean Air Act Amendments
CAFE	Corporate Average Fuel Economy
CAP	Climate Action Plan
CARB	California Air Resources Board
CAAQS	California Ambient Air Quality Standards
CalARP	California Accidental Release Program
CalEPA	California Environmental Protection Agency
CALGreen	California Green Building Standards
CAL FIRE	California Department of Forestry and Fire
CalRecycle	California Department of Resources Recycling and Recovery
Caltrans	California Department of Transportation
CBC	California Building Code
CCAA	California Clean Air Act
CCR	California Code of Regulations
CEC	California Energy Commission
CEQ	Council on Environmental Quality
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	Code of Federal Regulations
CGS	California Geological Survey
CH_4	Methane
CHHSLs	California Human Health Screening Levels

CLTL	Continuous Left-Turn Lane
CMCP	Clairemont Mesa Community Plan
CNEL	Community Noise Equivalent Level
CNG	Compressed Natural Gas
CO	Carbon Monoxide
CO_2E	Carbon dioxide equivalents
COS	Conservation and Open Space (element)
CPA	Community Plan Amendment
CPAR	Community Plan Amendment and Rezone
CPIOZ	Community Plan Implementation Overlay Zone
CPIOZ-A	Community Plan Implementation Overlay Zone Type A
CPIOZ-B	Community Plan Implementation Overlay Zone Type B
CPTED	Crime Prevention Through Environmental Design
CRHR	California Register of Historical Resources
CUPA	Certified Unified Program Agency
CUWMPA	California Waste Management Planning Act
dB	decibel(s)
dBA	A-weighted decibel(s)
DDA	Disposition and Development Agreement
DEH	San Diego County Department of Environmental Health
DHS	Department of Health Services
DMG	Division of Mines and Geology
DTSC	Department of Toxic Substances Control
ECTs	Emission Control Technologies
EIR	Environmental Impact Report
ELF	Extremely low frequency
EMF	Electric and magnetic fields
EMFAC	EMission FACtor Model
EO	Executive Order
Energy Code	California Energy Efficiency Standards for Residential and Nonresidential Buildings
EPA	Environmental Protection Agency
ESA	Environmental Site Assessment
FAR	Floor-area ratio
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
FIA	Federal Insurance Administration
General Plan	County of San Diego General Plan
GHG	greenhouse gas

GPA	General Plan Amendment
GWh	Gigawatt hours
GWP	Global Warming Potential
H&SC	Health and Safety Code
HAPs	Hazardous Air Pollutants
HCP	Habitat Conservation Plan
HFCs	Hydrofluorocarbons
HIRT	Hazardous Incident Response Team
HMBP	Hazardous Materials Business Plan
Hp	Horsepower
HRB	Historical Resources Board
HSWA	Hazardous and Solid Waste Amendments
HUD	U.S. Department of Housing and Urban Development
HVAC	Heating, ventilation, and air conditioning
HZ	Hertz
I-5	Interstate 5
I-805	Interstate 805
In/sec	Inches per second
ITS	intelligent transportation systems
IWMA	Integrated Waste Management Act
kV	Kilovolt
LCFS	Low Carbon Fuel Standards
LEED	Leadership in Energy and Environmental Design
L_{EQ}	equivalent sound level
LCCREF	Leadership Conference on Civil Rights Education Fund
LDC	Land Development Code
LID	Low Impact Development
LOS	level of service
LUST	Leaking Underground Storage Tank
MACTs	Maximum Achievable Control Technologies
Mgd	Million gallons per day
MJHMP	Multi-Jurisdictional Hazard Mitigation Plan
MMT	million metric tons
MPO	Metropolitan Planning Organization
MRZs	Mineral Resource Zones
MSAT	Mobile Source Air Toxics
MSCP	Multiple Species Conservation Program
MT	Metric Tons

MTS	Metropolitan Transit System
MWD	Metropolitan Water District
MUP	Major Use Permit
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NCWRP	North City Water Reclamation Plant
NEPA	National Environmental Policy Act
NESHAPs	National Emissions Standards for Hazardous Air Pollutants
NFIP	National Flood Insurance Program
NOP	Notice of Preparation
NOX	Oxides of nitrogen
NO_2	Nitrogen Dioxide
NPL	National Priority List
NRHP	National Register of Historic Places
NSLU	Noise Sensitive Land Use
NSR	New Source Review
O_3	Ozone
OPR	Office of Planning and Research
Pb	Lead
PEIR	Program Environmental Impact Report
PFCs	Perfluorocarbons
$PM_{2.5}$	Particulate matter smaller than 2.5 microns in diameter
PM_{10}	Particulate matter smaller than 10 microns in diameter
PPV	Peak particle velocity
PUD	Public Utilities Department
RAQS	Regional Air Quality Strategy
RCP	Regional Comprehensive Plan
RCRA	The Resource Conservation and Recovery Act
REL	Reference exposure level
RHNA	Regional Housing Needs Assessment
RMP	Resource Management Plan/Risk Management Plan
RPO	Resource Protection Ordinance
RPS	Resource Protection Study/ California renewable portfolio standard
RTP/SCS	Regional Transportation Plan/Sustainable Communities
RWQCB	Regional Water Quality Control Board
SANDAG	San Diego Association of Governments
SAM	Site Assessment and Mitigation (program)

SARA	Superfund Amendments and Reauthorization Act
SB	Senate Bill
SCS	Sustainable Communities Strategy
SDAB	San Diego Air Basin
SDAPCD	San Diego Air Pollution Control District
SDCWA	San Diego County Water Authority
SDFD	San Diego Fire-Rescue Department
SDG&E	San Diego Gas & Electric
SDMC	San Diego Municipal Code
SDPD	San Diego Police Department
SDPL	San Diego Public Library
SDUSD	San Diego Unified School District
SF	Square feet
SHMA	Seismic Hazard Mapping Act
SIP	State Implementation Plan
SLAMS	State and Local Air Monitoring Station
SMARA	Surface Mining and Reclamation Act
SO_2	Sulfur Dioxide
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	Toxic Air Contaminants
TCM Plan	Transportation Control Measures Plan
TDM	Transportation Demand Management
TDV	time-dependent value
TIF	Transportation Impact Fee
TIS	Transportation Impact Study
TPA	Transit priority area
TSCMP	Traffic Signal Communications Master Plan
Unified Program	Unified Hazardous Waste and Hazardous Materials Management Regulatory Program
U.S.	United States
USDOT	U.S. Department of Transportation
USEPA	United States Environmental Protection Agency
UST	Underground Storage Tank
UWMP	Urban Water Management Plan
VAP	Voluntary Assistance Program
V/C	Volume to Capacity Ratio
VdB	Vibrational decibel
VHFHSZ	very high fire hazard severity zone
VMT	Vehicle miles travelled
VOCs	Volatile Organic Compounds

WPO	Watershed Protection Ordinance
WRP	Water Reclamation Plant
WTP	Water Treatment Plant

EXECUTIVE SUMMARY

S.1 Project Synopsis

The proposed project involves a General Plan Amendment (GPA), a Community Plan Amendment (CPA) and the rezone of a 4.09-acre project site and a Disposition & Development Agreement (DDA) and Ground Lease to allow for future residential development on surplus County-owned land to be implemented using future permits issued by the City.

The County's primary objectives for the proposed project are:

1. Establish the ability for residential developers to construct affordable homes on surplus County property, consistent with San Diego regional housing policies.
2. Deliver a development-ready site, including demolition and removal of existing onsite structures and related facilities, and provision of stubbed-out utilities.
3. Encourage an increase in the supply and variety of housing types – affordable for people of all ages and income levels – in an area with existing or planned frequent transit service (i.e., transit priority area) and with access to a variety of public and commercial services.
4. Ensure high-quality development occurs on the site through the development of architectural and landscape supplemental development regulations.

A GPA is proposed to change the project site's underlying land use designation from Commercial Employment, Retail & Services to Residential. The project site is located within the Community Core Community Plan Implementation Overlay Zone (CPIOZ) Area of the larger Clairemont Mesa Community Planning Area. The site is currently designated for Commercial-Community Center and is zoned as Commercial Office (CO-1-2). Under the proposed project, the site's planned land use in the Community Plan would be changed from Commercial-Community Center to Residential-High (45–73 dwelling units per acre [du/ac]). The CPA would allow for a density of up to 448 residential units onsite; however, the DDA would cap the site capacity at a maximum of 404 dwelling units onsite. In addition to changing the site's designated land use and establishing a residential density cap for future development, the proposed CPIOZ Type A (CPIOZ-A) would also set the regulatory framework to guide future infill residential development of the project site (see Appendix B to this EIR).

For consistency with the CPA, the project site would be rezoned from Commercial Office (CO-1-2) to Residential – Multiple Units (medium density) (RM-3-9) (refer to Figure 1-3 and Figure 1-4). The CPIOZ-A supplemental

development regulations would be consistent with the general intent of the RM-3-9 zone as modified by the regulations contained in Appendix B.

To implement the future site redevelopment, the County would enter into a DDA with an affordable housing developer who would be responsible for constructing and operating the residential community. In addition to containing the legal terms and conditions of the County and developer's agreement, the DDA would set the scope of the development, including the capacity of the site at 404 affordable dwelling units, and require the developer to secure any necessary approvals from the City of San Diego or any other governmental agency affected by the construction and development. In addition to the DDA, the County would maintain ownership of the project site and issue a 99-year ground lease to the residential developer or their successors in interest.

The County proposes to deliver a development-ready site to a residential developer for the future development of an affordable housing community. To facilitate the future development of the site, all existing onsite structures would be demolished and removed by the County (or a contractor hired by the County through an approved Demolition Contract). Any required soil remediation would be completed following demolition activities and before grading is complete.

S.1.1 Project Location and Setting

The 4.09-acre project site is located in the Clairemont Mesa community, located at 5255 Mount Etna Drive. The project site contains buildings from the former San Diego County Regional Crime Lab (Crime Lab) facility and associated parking and landscaping. Existing onsite buildings include a one-story 66,000 square foot facility and a two-story 36,000 square foot building. The Crime Lab operations relocated from the project site to the County Operations Center complex in Kearny Mesa in 2018 and the property is currently vacant with the exception of some minimal onsite storage.

The site is surrounded by residential, office, and commercial land uses. Immediately to the west of the site are residential neighborhoods and an SDG&E easement. Approximately half a mile south of the project site is High Tech High Mesa, which is a public charter school. The project site is located near the intersection of two major arterial roads, Genesee Avenue and Mount Etna Drive. The Montgomery Field Airport is located approximately 2 miles to the east of the project site. The surrounding geographical features, according to the USGS, include Soledad Mountain 4.5 miles to the west, San Clemente Canyon 2 miles to the north, and Murphy Canyon 3.7 miles to the east.

Areas surrounding the project site, are mostly developed with residential, commercial, and office uses. The surrounding commercial development adjacent to and south of the project site includes the Balboa Towers, which are two medical

buildings that are seven and ten stories in height. In addition, one-, two-, and three-story commercial buildings are located north and east of the project site.

S.2 Summary of Impacts

The analysis contained in the EIR uses the words “significant” and “less than significant” in the discussion of impacts. These terms specifically define the degree of impacts in relation to thresholds used to determine significance of impact identified in each environmental impact section of this EIR. Significant impacts are those adverse environmental impacts that meet or exceed the significance thresholds. As required by CEQA, mitigation measures have been included in this EIR to avoid or substantially reduce the level of significant impacts.

Chapter 2 of the EIR provides discussions of those issue areas for which project implementation would result in either (1) significant impacts that cannot be avoided and/or (2) significant impacts that can be avoided, reduced, or minimized through mitigation measures that would be implemented by the proposed project. The sections with mitigation include Sections 2.1, Air Quality; 2.2, Hazards and Hazardous Materials; 2.3, Noise and Vibration; and 2.4, Transportation and Traffic.

Transportation and Traffic would result in significant and unavoidable impacts. Air Quality, Hazards and Hazardous Materials, Noise and Vibration, and Transportation and Traffic include mitigation that would reduce project impacts to less than significant but not eliminate all of the project’s impacts.

Chapter 3 of the EIR discusses effects that were identified as not to be significant. These sections include Sections 3.1, Aesthetics; 3.2, Energy; 3.3, Greenhouse Gas Emissions; 3.4, Land Use and Planning; 3.5, Population and Housing; 3.6, Public Services; 3.7, Recreation; and 3.8, Utilities and Service Systems.

Table S-1 summarizes the results of the environmental analysis completed for the project. Table S-1 also includes mitigation measures proposed to reduce or avoid the environmental effects, with a conclusion as to whether the impact has been mitigated to below a level of significance.

Table S-1
Summary of Impacts and Mitigation Measures for the Proposed Project

Environmental Impact	Mitigation Measures	Significance Determination after Mitigation
Air Quality		
Impact AIR-1: Health risk for residential receptors would exceed the SCAQMD significance threshold of 10-in-one million for residential receptors associated with both future building construction and site demolition and preparation for the proposed project.	**AIR-1: Construction Equipment** The project shall require all off-road diesel equipment greater than 50 horsepower (hp) used during construction activities to meet USEPA Tier 4 final off-road emission standards or equivalent**.** Such equipment shall be outfitted with Best Available Control Technology (BACT) devices including a CARB-certified Level 3 Diesel Particulate Filter or equivalent.	Less than Significant
Hazards and Hazardous Materials		
Impact HAZ-1: Due to removal of the UST and potential to encounter contaminated media, including asbestos and lead materials, the proposed project would handle hazardous materials within a quarter-mile of a school.	**HAZ-1: Soil Contamination, Lead, and Asbestos Recommendations** During demolition of the existing buildings, site preparation for the future development, and construction of the future development, the construction contractor shall ~~follow~~ implement the findings and recommendations of the Phase I ESA, including: • ~~In future development of the project site, preparation and implementation of a~~ A soil management plan shall be prepared by a qualified specialist and implemented ~~used~~ during project construction activities near areas of known contamination~~. Where contamination is known or suspected, and~~ or where grading or other soil disturbance activities could encounter contaminated media, undocumented USTs, or other unknown contamination or hazards~~, implementation of a~~ The soil management plan ~~provides~~ shall contain protocols to address site-specific ~~hazardous~~ conditions~~, if encountered,~~ in ~~accordance~~ compliance with local, state, and federal regulations. • Soil sampling shall be performed at the time of ~~the~~ UST removal to evaluate whether an unauthorized release has occurred. If contaminated soil is identified, protocols in the soil management plan shall be implemented in compliance with local, state, and federal regulations. • A worker health and safety plan shall be prepared and implemented during construction near areas of known contamination. • ~~A~~ The extent of asbestos-containing materials and lead-based paint shall be ~~evaluated~~ determined through appropriate testing techniques prior to ~~razing of the site~~ building demolition. Proper protocols for the removal of asbestos-containing materials and lead-based paint shall be followed in compliance with local, state, and federal regulations.	Less than Significant

Environmental Impact	Mitigation Measures	Significance Determination after Mitigation
Impact HAZ-2: Due to the potential for lane closures during construction of the future development, the proposed project could temporarily interfere with emergency access.	**HAZ-2: Traffic Control Plan** Prior to the start of construction of the future development, the construction contractor shall prepare a Traffic Control Plan satisfactory to the City Engineer. The Traffic Control Plan shall show all signage, striping, delineated detours, flagging operations, and any other devices that will be used during construction to guide motorists, pedestrians, and bicyclists through the construction area and allow for adequate access and circulation to the satisfaction of the City Engineer. The Traffic Control Plan shall be prepared in accordance with the City's traffic control guidelines and shall be prepared to ensure that emergency access will be continuously provided.	Less than Significant
Impact HAZ-3: The project site is listed on several database searches pursuant to Government Code Section 65962.5 and includes areas of known previous contamination. Grading and other soil disturbance activities could encounter contaminated media or other unknown contamination or hazards.	Refer to HAZ-1 and HAZ-2 above.	Less than Significant
Noise and Vibration		
Impact NOI-1: A temporary increase in ambient noise levels above existing (ambient) conditions at off-site sensitive receivers during construction of the future residential housing project would occur (during both construction of the future development and during site demolition and preparation activities), and impacts would be considered significant.	**NOI-1: Construction Noise** The following construction noise abatement techniques shall be implemented by the construction contractor to reduce construction-related noise to less than a 10 dBA increase in existing ambient noise levels at nearby noise-sensitive receivers: • Temporary noise barriers shall be placed to block the line-of-sight between construction equipment operation and the residential land uses in proximity to the proposed project's property line to the north and west. One of the following two options shall be implemented by the construction contractor: a. A temporary noise barrier shall be placed along the entire western property line of the project site and approximately 50 feet to the north from the northwestern corner at a height of 14 feet with noise blankets capable of achieving sound level reductions of at least 8 dBA to block the line-of-sight between construction equipment operations and the offsite noise-sensitive receivers to the south and southwest; or b. A temporary 50-by-50-foot "L-shaped" noise barrier shall be constructed for each small construction area at a height of 14 feet with noise blankets capable of achieving sound level reductions of at least 8 dBA to block the line-of-sight between construction equipment operations and the offsite noise-sensitive receivers.	Less than Significant

Environmental Impact	Mitigation Measures	Significance Determination after Mitigation
Traffic and Transportation		
Impact ~~TIA~~TRA-1: Existing plus Project The proposed project would result in significant direct impacts at the following two study intersections and one study roadway segment: Intersections: 9. Mount Everest Boulevard & Balboa Avenue (Access Options 1 and 3) 10. Genesee Avenue & Balboa Avenue (Access Option 3) Roadway Segments: 11~~7~~. Balboa Avenue, between Cannington Drive and Charger Boulevard (all access options)	**TRA-1: Mount Everest Boulevard & Balboa Avenue Intersection Modifications (Access Options 1 and 3)** Prior to issuance of the first building permit, Owner/Permittee shall assure by permit and bond the restriping of the northbound and southbound approaches on Mount Everest Boulevard to provide an exclusive left-turn lane and a shared through-right turn lane, then convert the northbound and southbound approaches from split phasing to protected left-turn phasing, satisfactory to the City Engineer. Improvements shall be completed and operational prior to first occupancy. **TRA-2: Genesee Avenue & Balboa Avenue Intersection Modifications (Access Option 3)** Prior to issuance of the first building permit, Owner/Permittee shall assure by permit and bond the ~~optimization of signal timing or~~ installation of traffic systems management (TSM) strategies (e.g., adaptive signal technology) to maximize efficiency of the existing roadway through improved signal communications and operations satisfactory to the City Engineer. Improvements shall be completed and operational prior to first occupancy. **TRA-3: Cannington Drive & Balboa Avenue Intersection Modifications (All Access Options).** Prior to issuance of the first building permit, Owner/Permittee shall assure by permit and bond the installation of traffic systems management (TSM) strategies (e.g., adaptive signal technology) to maximize efficiency of the existing roadway through improved signal communications and operations satisfactory to the City Engineer. Improvements shall be completed and operational prior to first occupancy. ~~There are no feasible improvements that would expand the capacity of the impacted roadway segment and the County cannot assure that the City would implement adaptive signal controls along the Balboa Avenue corridor.~~ The implementation of adaptive signal controls along the impacted segment of Balboa Avenue, as stated in Mitigation Measure TRA-3, as well as signal modifications at the Charger Boulevard & Balboa Avenue intersection recommended below in Mitigation Measure TRA-4, would partially mitigate the project's impacts. However, this impact would remain significant and unavoidable for all access options.	Significant and Unavoidable
Impact ~~TIA~~TRA-2: Near-Term plus Project The proposed project would result in significant direct impacts at the following three study intersections and two study roadway segments: Intersections:	Refer to TRA-1, ~~and~~ TRA-2 and TRA-3 above. **TRA-~~3~~4: Charger Boulevard & Balboa Avenue Intersection Modifications (~~a~~All ~~a~~Access ~~o~~Options)** Prior to issuance of the first building permit, Owner/Permittee shall assure by permit and bond the restriping of the northbound shared through-left turn lane into an exclusive through lane and convert the northbound and southbound signal from split phasing to protective phasing and the installation of traffic systems management (TSM) strategies	Significant and Unavoidable

Environmental Impact	Mitigation Measures	Significance Determination after Mitigation
9. Mount Everest Boulevard & Balboa Avenue (all access options) 10. Genesee Avenue & Balboa Avenue (Access Option 3) 14. Charger Boulevard & Balboa Avenue (all access options) Roadway Segments: 17. Balboa Avenue, between Cannington Drive and Charger Boulevard (all access options) 18. Balboa Avenue, between Charger Boulevard and I-805 Southbound Ramps (all access options)	(e.g., adaptive signal technology) to maximize efficiency of the existing roadway through improved signal communications and operations, satisfactory to the City Engineer. Improvements shall be completed and operational prior to first occupancy. ~~There are no feasible improvements that would expand the capacity of the impacted roadway segment and the County cannot assure that the City would implement adaptive signal controls along the Balboa Avenue corridor.~~ The implementation of adaptive signal controls along the impacted segments of Balboa Avenue recommended in Mitigation Measure TRA-3, as well as signal modifications and adaptive signal controls at the Charger Boulevard & Balboa Avenue intersection recommended in Mitigation Measure TRA-4 would partially mitigate the project's impacts. However, the roadway segment impacts would remain significant and unavoidable for all access options.	

Environmental Impact	Mitigation Measures	Significance Determination after Mitigation
Impact ~~TIA~~TRA-3: Cumulative plus Project The proposed project would result in significant impacts at the following five study intersections and two study roadway segments: Intersections: 1. Genesee Avenue & Clairemont Mesa Boulevard (all access options) 8. Clairemont Drive & Balboa Avenue (all access options) 9. Mount Everest Boulevard & Balboa Avenue (all access options) 10. Genesee Avenue & Balboa Avenue (all access options) 14. Charger Boulevard & Balboa Avenue (all access options) Roadway Segments: 11. Mount Etna Drive, between Mount Everest Boulevard and Genesee Avenue (Access Option 1) 18. Balboa Avenue, between Charger Boulevard and I-805 Southbound Ramps (all access options)	Refer to TRA-1 through TRA-~~3~~4 above **TRA-~~4~~5: Genesee Avenue & Clairemont Mesa Boulevard Adaptive Signal Control System (All Access Options)** Prior to issuance of the first building permit, Owner/Permittee shall pay its fair share (5.0 percent) toward ~~optimizing signal timing or~~ the cost of installing traffic systems management (TSM) strategies (e.g. adaptive signal technology) to maximize efficiency of the existing roadway through improved signal communications and operations, satisfactory to the City Engineer. **TRA-~~5~~6: Clairemont Drive & Balboa Avenue Adaptive Signal Control System (All Access Options)** Prior to issuance of the first building permit, Owner/Permittee shall pay its fair share (4.3 percent) toward ~~optimizing signal timing or~~ installing traffic systems management (TSM) strategies (e.g. adaptive signal technology) to maximize efficiency of the existing roadway through improved signal communications and operations, satisfactory to the City Engineer. ~~Unless and until a specific mitigation program is created by the City to accommodate proportionate contributions toward the implementation of adaptive signal controls or other improvements at the impacted intersection locations, the County cannot assume that payment of its fair share of the mitigation improvements would reduce or avoid the project's impact.~~ ~~There are no feasible improvements that would expand the capacity of the impacted roadway segments and the County cannot assure that the City would implement adaptive signal controls along the Balboa Avenue corridor.~~ Implementation of the ITS improvements noted above in Mitigation Measures TRA-5 and TRA-6 would partially mitigate the project's Cumulative plus Project impact at the two study intersections listed above for all access options. These intersections are identified in the TSCMP as deficient and in need of repair. Improving signal timings could result in an increase in intersection capacity, vehicle throughput, and reduction in vehicle delays. However, the improvements are not fully funded at this time. Therefore, Cumulative plus Project impacts at two intersections would remain significant and unavoidable even with the fair share payments noted above. There are no feasible improvements that would expand the capacity of the impacted roadway segments. The implementation of adaptive signal controls at Cannington Drive & Balboa Avenue recommended in Mitigation Measure TRA-3, as well as signal modifications and adaptive signal controls at the Charger Boulevard & Balboa Avenue intersection recommended in Mitigation Measure TRA-4 would partially mitigate the project's cumulative impacts. However, this Cumulative plus Project roadway segment impact would remain significant and unavoidable for all access options.	Significant and Unavoidable

Environmental Impact	Mitigation Measures	Significance Determination after Mitigation
Aesthetics		
Implementation of the proposed project would not result in significant aesthetic impacts.		
Energy		
Implementation of the proposed project would not result in significant energy impacts.		
Greenhouse Gas Emissions		
Implementation of the proposed project would not result in significant greenhouse gas emissions impacts.		
Land Use and Planning		
Implementation of the proposed project would not result in significant land use and planning impacts.		
Population and Housing		
Implementation of the proposed project would not result in significant population and housing impacts.		
Public Services		
Implementation of the proposed project would not result in significant public services impacts.		
Recreation		
Implementation of the proposed project would not result in significant recreation impacts.		
Utilities		
Implementation of the proposed project would not result in significant utilities impacts.		

S.3 Areas of Controversy

The original Notice of Preparation (NOP) was distributed on September 10, 2018 for a 30-day public review and comment period, which was extended to October 19, 2018 to allow for a second scoping meeting closer to the project site and more accessible to community members. Public comments were received on the NOP for this EIR and reflect concern or controversy over several environmental issues.

Additionally, two scoping meetings regarding the proposed project were held. The first public scoping meeting was held on Tuesday, September 25, 2018 from 6:00 p.m. to 8:00 p.m. in the Commons at the County Operations Center located at 5520 Overland Avenue, San Diego, CA 92123. A second public meeting was held on Monday, October 15, 2018 from 6:00 p.m. to 8:00 p.m. in the Auditorium at the Marston Middle School located at 3799 Clairemont Drive, San Diego, CA 92117. A number of comment forms were collected from that meeting, as well as subsequent comments via e-mail or mail. A total of 293 communications were received on the NOP from state agencies, groups and organizations, and individuals. State and local agencies include California Department of Transportation (Caltrans), San Diego Association of Governments (SANDAG), and Clairemont Town Council. Groups and organizations include the Clairemont Coalition on Homelessness and Clairemont Cares.

Issues raised at the scoping meetings and from the NOP comment letters include concerns regarding the following issue areas: aesthetics and community character; air quality, noise and traffic impacts to surrounding communities; population and housing with regard to increased density of the proposed project; availability of public services and utilities to support additional residential density; lack of recreational opportunities within the local community; and potential increase in crime and hazards to future residents due to lack of adequate evacuation routes.

Issues raised within these letters are evaluated in this EIR in Chapters 2.0 through 4.0.

S.4 Issues to be Resolved by the Decision-Making Body

An EIR is an informational document intended to inform the public agency decision makers and the public of the significant effects of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the proposed project. The lead agency (in this case the County) must respond to each significant effect identified in this EIR by making “Findings” for each significant effect. The issues to be resolved include whether or how to mitigate the associated significant effects, including whether to implement a project alternative, the determination of which is to be made by the decision makers. Preparation of a Statement of Overriding Considerations (explaining the

overriding value of the Project despite adverse effects) would be required for any remaining significant and unmitigated impacts.

Issues to be resolved that are directly related to the proposed project include the choice among alternatives and whether or how to mitigate the significant effects. In addition, the County must determine whether any of the Project alternatives would substantially reduce significant effects while still meeting key Project objectives.

S.5 Analysis of Alternatives

S.5.1 Project Alternatives

CEQA requires an EIR to consider a reasonable range of potentially feasible alternatives that would lessen significant impacts identified with the Proposed Project and to foster informed decision making. Chapter 4.0 of this EIR considers a No Project/No Redevelopment alternative, No Project/Existing Community Plan and Zoning alternative, Reduced Intensity Project alternative.

The No Project/No Redevelopment Alternative would not require a Community Plan Amendment (CPA) and rezone from the City of San Diego and the existing vacated San Diego County Regional Crime Lab (Crime Lab) facility would remain on the project site. None of the proposed building demolition (i.e., 103,500 square feet [SF]) would occur and the project site would not be regraded to prepare a developable pad. Affordable housing would not ultimately be constructed under this alternative, further exacerbating the lack of affordable housing in the San Diego County region. The existing structures would remain unoccupied.

The No Project / Existing Community Plan and Zoning Alternative would not require a CPA and rezone and the existing vacated Crime Lab facility would be demolished and the site sheet graded to prepare for future commercial development. Land uses permitted under the Commercial-Community Center designation include shopping areas with retail, service, civic, and offices uses for the community at large. Specifically, the project site is currently zoned Commercial Office (CO-1-2) which is to provide employment uses with limited, complementary retail uses and residential uses as specified, and is intended to apply in large-scale activity centers or in specialized areas where a full range of commercial activities is not desirable (SDMC Section 131.0504). Under this alternative, the project site would be available for sale to a developer for the construction of a commercial office development. This alternative would allow for the future construction of up to 70,000 SF of commercial office development, specifically as medical office use, with supporting retail space, as permitted by the development regulations for the CO-1-2 zone. Any future redevelopment of the project site would undergo review by City staff for compliance with the CMCP Community Core CPIOZ-B requirements related to architectural/site design,

parking design, landscaping, signage and pedestrian/bicycle circulation. Buildings would be limited to 30 feet in height in accordance with the overlay zone in the CMCP.

The Reduced Intensity Project Alternative would result in the same CPA and zone change as the proposed project and the existing vacated Crime Lab facility would be demolished. Under this alternative, the project site would be entitled for the construction of a 312-unit affordable housing project, which would house approximately 633 people. This alternative was developed to reduce the proposed project's direct traffic impacts on roadway segments or intersections by decreasing the unit count to a point where at least one traffic impact would be reduced to less than significant. Reducing units would reduce both the volume of daily trips generated by the site and the number of peak hour trips occurring during the most impacted periods of the day. Under this alternative the permitted unit count would be reduced from 404 units to 312 units. All other aspects of the project would remain the same as the proposed, except that the required amount of parking would be reduced to reflect the lower number of residents.

S.5.2 Environmentally Superior Alternative

A summary of impacts of the alternatives compared to the proposed project is included in **Table S-2**, pursuant to CEQA Guidelines Section 15126.6(d).

CEQA Guidelines Section 15126.6(a) states that an EIR shall describe a range of reasonable alternatives. As evaluated in Chapter 2.0 of this EIR, the significant impacts of the proposed project would affect air quality (construction air toxic emissions); hazards and hazardous materials (USTs and asbestos/lead materials); noise (construction equipment noise); and transportation and traffic (roadway segment and intersection operations). As it would substantially lessen impacts to each of these issue topics to a less than significant level, the No Project Alternative / No Redevelopment Alternative would be the environmentally superior alternative.

However, CEQA Guidelines Section 15126.6(e)(2) also states that if the environmentally superior alternative is the "no project" alternative, the EIR shall also identify an environmentally superior alternative from among the other alternatives. The Reduced Intensity Project Alternative would be the environmentally superior alternative from the remaining alternatives, as it would reduce vehicle trips and avoid significant and unavoidable traffic impacts associated with the proposed project at one roadway segment location in the study area, and it would meet many of the basic project objectives.

Table S-2
Comparison of Alternatives to the Proposed Project

	Issue Area	Proposed Project Impacts	No Project / No Redevelopment Alternative	No Project/ Existing Community Plan and Zoning Alternative	Reduced Intensity Project Alternative
2.1	Air Quality	SM	LTS	SM(-)	SM
2.2	Hazards and Hazardous Materials	SM	LTS	SM	SM
2.3	Noise and Vibration	SM	LTS	SM	SM
2.4	Transportation and Traffic	SU	LTS	SU(+)	SU(-)

LTS = Less than significant
SM = Significant and mitigated
SU = Significant and unavoidable
(-) Impacts would be less than those of the proposed project
(+) Impacts would be greater than those of the proposed project

CHAPTER 1.0 PROJECT DESCRIPTION, LOCATION, AND ENVIRONMENTAL SETTING

1.1 Project Objectives

This chapter describes the proposed Mount Etna Community Plan Amendment (CPA) and Rezone Project (referred to herein as the "proposed project"). The proposed project is located in the Clairemont Mesa Community Planning Area, in the City of San Diego (City). This chapter also includes a statement of project objectives, a general description of project characteristics and the environmental setting, the precise location and boundaries of the proposed project, and a statement describing the intended uses of this Draft Environmental Impact Report (EIR).

The San Diego County Board of Supervisors authorized the San Diego County Department of General Services to identify surplus County-owned property for the purpose of leasing the property to residential developers through a competitive procurement process The underlying purpose of the proposed project is to provide a site for affordable housing and related support services in close proximity to transit, commercial centers, and existing public services. The County of San Diego Department of General Services has identified the project site as a surplus County property that meets these general criteria.

California Environmental Quality Act (CEQA) Guidelines Section 15124 requires an EIR to include a statement of objectives sought by the proposed project. The following specific objectives for the proposed Mount Etna CPA support the underlying purpose of the project, which is to assist the County in developing a reasonable range of alternatives to evaluate in this Draft EIR and aid in the preparation of findings and overriding considerations, if required, in accordance with CEQA Guidelines Section 15091.

The County's primary objectives for the proposed project are:

1. Establish the ability for residential developers to construct affordable homes on surplus County property, consistent with San Diego regional housing policies.
2. Deliver a development-ready site, including demolition and removal of existing onsite structures and related facilities, and provision of stubbed-out utilities.
3. Encourage an increase in the supply and variety of housing types – affordable for people of all ages and income levels – in an area with existing or planned frequent transit service (i.e., transit priority area) and with access to a variety of public and commercial services.

4. Ensure high-quality development occurs on the site through the development of architectural and landscape supplemental development regulations.

1.2 Project Description

The proposed project involves a General Plan Amendment (GPA), a CPA and the rezone of a 4.09-acre project site to allow for future residential development on surplus County-owned land to be implemented using future permits issued by the City. The following describes the various components of the project that implement the project's objectives described above.

1.2.1 Project Components

The 4.09-acre site's regional location and project vicinity are shown in **Figure 1-1** and **Figure 1-2**. The existing and proposed Clairemont Mesa Community Plan (CMCP) land use designations are shown in **Figure 1-3** and **Figure 1-4**. Existing and proposed zoning are shown in **Figure 1-5** and **Figure 1-6**.

On December 6, 2018, the City's Planning Commission approved Planning Commission Resolution No. 4979-PC, authorizing the initiation of a CPA to the CMCP and a rezone of the project site, subject to conditions contained within City Planning Report No. PC–18-066. The Resolution No. 4979-PC is contained in Appendix C to this EIR.

1.2.1.1 General Plan Amendment

A GPA is proposed to change the project site's underlying land use designation from Commercial Employment, Retail & Services to Residential as depicted on Figure LU-2 of the General Plan to maintain consistency with the CPA described below.

1.2.1.2 Community Plan Amendment

The project site is located within the Community Core Community Plan Implementation Overlay Zone (CPIOZ) Area of the larger Clairemont Mesa Community Planning Area. The site is currently designated for Commercial-Community Center and is zoned as Commercial Office (CO-1-2) (Figures 1-3 and 1-4). Under the proposed project, the site's planned land use in the Community Plan would be changed from Commercial-Community Center to Residential-High (45-73 dwelling units per acre [du/ac]). The CPA would allow for a density of up to ~~448~~ 404 residential units onsite, as detailed in Appendix B.; ~~however, the~~ In addition, the Disposition and Development Agreement (DDA) described below would cap the site capacity at a maximum of 404 dwelling units onsite. Any future development proposal beyond 404 dwelling units would require a CPA and may be subject to additional CEQA review.

In addition to changing the site's designated land use and establishing a residential density cap for future development, the proposed CPIOZ Type A (CPIOZ-A) would also set the regulatory framework to guide future infill residential development of the project site (see Appendix B to this EIR). The intent of the CPIOZ-A supplemental development regulations is to provide primarily for multifamily housing that would complement the surrounding Community Core and existing single-family residential uses in the project area. Additional uses that would activate the ground floor and provide community benefit for residents and the surrounding community would also be required on site but limited to a building area of 1,500 square feet (SF). In addition to the community space, resident support uses would also be integrated into the residential development on the project site.

The proposed CPIOZ-A would be consistent with the general intent of the RM-3-9 zone as modified by the proposed regulations and any incentives or waivers granted pursuant to Article 3: Supplemental Development Regulations, Division 7: Affordable Housing Regulations of the SDMC and any State allowed density bonus incentives. The supplemental development regulations outline specific requirements for: ground floor uses; building height; building setbacks; landscape/streetscape; building articulation; screening/fencing; residential open space; and environmental protection standards (see Appendix B).

The following is a summary of the key elements of the CPIOZ-A supplemental development regulations, while the details are contained in Appendix B to this EIR.

- Provide for multifamily residential uses that complement the surrounding community core and existing single family residential uses.
- Non-residential ground floor public spaces or uses would be required.
- Maximum building height would not exceed 70 feet above grade, including accessory building features such as parapets, elevator towers, and stairwells.
- Building articulation would be implemented to create visual interest, to enhance the pedestrian experience, to assist in diminishing the overall mass of buildings, and to create variation from an exterior perspective.
- Residential open space would be required including private exterior open space and common space.

1.2.1.3 Rezone

For consistency with the CPA, the project site would be rezoned from Commercial Office (CO-1-2) to Residential – Multiple Units (medium density) (RM-3-9) (refer to Figure 1-3 and Figure 1-4). Under the proposed RM-3-9 zone, 297 multi-family units would be the maximum density allowable on the project site without an affordable housing density bonus. As described above, the CPIOZ-A supplemental

development regulations would be consistent with the general intent of the RM-3-9 zone as modified by the regulations contained in Appendix B.

1.2.1.4 Disposition and Development Agreement and Ground Lease

To implement the future site redevelopment, the County would enter into a DDA with an affordable housing developer who would be responsible for constructing and operating the residential community. In addition to containing the legal terms and conditions of the County and developer's agreement, the DDA would set the scope of the development, including the capacity of the site at 404 affordable dwelling units, and require the developer to secure any necessary approvals from the City of San Diego or any other governmental agency affected by the construction and development. In addition to the DDA, the County would maintain ownership of the project site and issue a 99-year ground lease to the residential developer or their successors in interest.

1.2.1.5 Site Demolition and Preparation

Demolition Phase

The County proposes to deliver a development-ready site to a residential developer for the development of an affordable housing community. To facilitate the future development of the site, all existing onsite structures would be demolished and removed by the County (or a contractor hired by the County through an approved Demolition Contract). All demolition activities and site preparation staging and activities would occur onsite. Any required soil remediation would be completed following demolition activities.

Demolition of the existing onsite structures, parking areas, landscaping, and associated utilities as part of the proposed project would enable the County to deliver a rough graded pad for future development. All existing underground utilities and storage tanks would be removed during the demolition, and utility connections (i.e., potable water, sewer, electrical, and natural gas) would be stubbed out at the project site boundary to facilitate future site development. Demolition activities are expected to take five months to complete from mobilization to final site clearing.

Demolition would require the following administrative approvals from the County: Traffic Control Plan, Debris Management Plan, Haul Route Plan, Asbestos Abatement Plan, Lead Hazards Notification, Stormwater Management Plan, and a Site Specific Safety Plan. Specifically, San Diego County Ordinance 9840 requires that a Debris Management Plan be prepared to identify how and where 90 percent of the inert construction and demolition debris, and 70 percent of all other construction and demolition debris would be recycled. Demolition debris recycling would occur either onsite or at an approved offsite location. Refer to

Section 3.8, Utilities and Service Systems, for additional discussion of these requirements.

Grading Phase

Once the demolition is complete, the materials removed, and any soil remediation is conducted, the project site would be graded to a rough graded pad with a maximum 2 percent slope to ensure that the pad drains correctly. Once grading is completed, erosion control features, including straw waddles would be installed in accordance with applicable stormwater pollution regulations. Site grading is anticipated to require two weeks to complete.

1.2.1.6 Future Building Construction/Operations

The specific design and development of the project site with an affordable housing community is not part of this proposed project but would be developed in the future by an affordable housing developer who would be engaged with the County through the DDA (as described above). The construction and operation of the residential housing community would be subject to future ministerial permit approvals from the City once the GPA, CPA, and rezone are approved. The future development project would be built as a Leadership in Energy and Environmental Design (LEED) Building Design Silver or equivalent. All future building construction activities and staging would occur onsite, with exception of any driveway reconfigurations needed within the public right-of-way.

Although not part of the proposed project, future residential building construction schedule assumptions have been developed so that the environmental impact analysis (i.e., air quality, GHG, noise) of a reasonably foreseeable project could be completed for this EIR. The analysis presented in this EIR assumes that onsite building construction would begin in ~~March~~ June 2021 and be completed by October 2022. It also assumed that residential building occupancy would occur by the end of 2022.

When the design is developed for the future residential development, up to three potential vehicular access options could be allowed from the project site, including but not limited to, the following (as show in **Figure 1-7**):

- A primary access point on Mount Etna Drive which would include a drop-off and delivery area adjacent to the main building entrance (Potential Access Point 1 on the figure);
- A second right-in, right-out only access point to Genesee Avenue, as allowable by the City Engineer (Potential Access Point 2 on the figure); and
- A third right-in, right-out only access point via the San Diego Gas & Electric (SDG&E) easement (located west of the project site) to Balboa

Avenue, as allowable by SDG&E and the City Engineer (Potential Access Point 3 on the figure).

The transportation implications of all three residential access options are studied in Section 2.4, Transportation and Traffic, of this EIR.

1.2.2 Technical, Economic, Environmental Characteristics

1.2.2.1 Technical and Environmental Characteristics

Technical and environmental commitments are proposed that are both standard construction and operational measures, as well as those associated with the project itself, to minimize the potential adverse effects of implementing the proposed project. The specific design features required of the future residential development are outlined in the CPIOZ supplemental development regulations contained in Appendix B to this EIR. These design features are referenced in the analysis of project impacts contained in Chapters 2.0 and 3.0, as applicable.

1.2.2.2 Economic Characteristics

San Diego County is facing a severe housing affordability crisis, particularly for low-income and very low-income households (SANDAG 2018). The project would facilitate future affordable residential development on a County-owned site, serving lower income households as defined by the California Department of Housing and Community Development.

In describing and evaluating a project in an environmental review document prepared pursuant to CEQA statute Section 21082.4, the lead agency may consider specific economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project and the negative impacts of denying the project. Any benefits or negative impacts considered pursuant to this section shall be based on substantial evidence in light of the whole record. Section 3.5.1.2 of this EIR (Population and Housing) includes a discussion of the negative impacts on the affordable housing supply within San Diego County by not approving the proposed project.

1.3 Project Location

The 4.09-acre project site is located in the Clairemont Mesa community, located at 5255 Mount Etna Drive (Figure 1-2). The site is surrounded by residential, office, and commercial land uses. Immediately to the west of the site is an SDG&E easement, with residential homes located west of the easement. Approximately half a mile south of the project site is High Tech High Mesa, which is a public charter school. The project site is located near the intersection of ~~two major arterial roads,~~ Genesee Avenue and Mount Etna Drive. The Montgomery

Field Airport is a public airport located approximately 2 miles to the east of the project site.

1.4 Environmental Setting

1.4.1 Elevation Profile

The topography of the project site can be characterized as flat with no gradient in elevation. The elevation of the project site is 367 feet above mean sea level (AMSL).

1.4.2 Existing Geology and Subsurface Conditions

The entire project site has been previously graded and disturbed during construction of the existing buildings. The project site is underlain by Chesterton-Urban land complex soil type, which is primarily composed of sandy loam and fill materials (USDA 2019). There are no known earthquake faults or unstable slopes onsite. The nearest Alquist-Priolo Fault is the Rose Canyon Fault, which is located approximately 2.3 miles west of the project site.

1.4.3 Existing Onsite and Surrounding Land Uses

The project site contains buildings from the former San Diego County Regional Crime Lab (Crime Lab) facility and associated parking and landscaping. Existing onsite buildings include a one-story 66,000 SF facility and a two-story 36,000 SF building. The Crime Lab operations relocated from the project site to the County Operations Center complex in Kearny Mesa in 2018 and the property is currently vacant with the exception of some minimal onsite storage.

Areas surrounding the project site, are mostly developed with residential, commercial, and office uses. The surrounding commercial development adjacent to and south of the project site includes the Balboa Towers, which are two medical buildings that are seven and ten stories in height. In addition, one-, two-, and three-story commercial buildings are located north and east of the project site. As previously detailed, the 50-foot SDG&E easement is located west of the project site, with single-family residential homes located further west of the easement.

The project site is served by Metropolitan Transit System (MTS) bus routes 27 and 41 with frequent services. MTS Bus Route #27 runs every 30 minutes during peak periods and hourly during off-peak period on weekdays and hourly on Saturdays. MTS Bus Route #41 runs every 15 minutes during peak periods and every 30 minutes during off-peak periods on weekdays. The project site is located within a planned (2035) transit priority area (TPA) as identified on the TPA map contained in the SANDAG's San Diego Forward: The Regional Plan

(SANDAG 2019), as well as the Smart Growth Map that uses those transit assumptions. The project site is in a TPA due to its location with high-frequency transit service on Genesee Avenue and planned high frequency bus service along Balboa Avenue being phased in by 2020 with planned rapid transit scheduled for 2035. Once funding for these additional transit services is secured by MTS, two high-frequency bus routes would intersect in the project area to support the TPA identification. The expanded transit service along Balboa Avenue would also provide connections to the trolley station being constructed at Balboa Avenue and Morena Boulevard, planned to be operational by 2021. In accordance with Senate Bill (SB) 743, TPA means an area within one-half mile of a major transit stop that is existing or planned. "Major transit stop", as defined by Section 21064.3, means "a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service of 15 minutes or less during the morning and afternoon peak commute periods".

1.4.4 Existing Electrical Magnetic Fields

The project site is adjacent to a 50-foot wide SDG&E easement (Figure 1-2) with two sets of overhead transmission lines (12 kilovolts [kV], 69 kV, 138 kV, and 230 kV). Extremely low frequency (ELF) electric and magnetic fields (EMF) include alternating current (AC) fields and other electromagnetic, non-ionizing radiation from 1 hertz (Hz) to 300 Hz. Power lines, like electrical wiring and electrical equipment, produce ELF fields at 60 Hz (OSHA 2016). This EIR does not consider EMF in the context of the CEQA analysis of potential environmental impacts because: [1] there is no agreement among scientists that EMF creates a potential health risk, and [2] there are no defined or adopted CEQA standards for defining health risk from EMF. For example, on behalf of the California Public Utilities Commission (CPUC), three scientists who work for the California Department of Health Services (DHS) were asked to review studies by the National Institutes of Environmental Health Sciences Working Group, the International Agency for Research on Cancer, and the British National Radiological Protection Board about possible health problems from electric and magnetic fields from power lines, wiring in buildings, some jobs, and appliances (Neutra et al., 2002). The results of their evaluation noted "important differences between the three DHS reviewers' conclusions" and made no recommendations about actions to be taken to address potential health risks (*Id*.). However, recognizing that there is a great deal of public interest and concern regarding potential health effects from human exposure to EMF from transmission lines, this document does provide information regarding EMF associated with electric utility facilities and human health and safety. Thus, the EMF information in this EIR is presented for the benefit of the public and decision makers.

1.4.5 History of the Project Site

Prior to being occupied by the Crime Lab, the on-site facilities housed the former Clairemont Hospital that closed in 1988. The County acquired the facility in 1989 and the Crime Lab operated in this facility until it was relocated to the County Operations Center in 2018.

1.5 Intended Uses of the EIR

This EIR is an informational document that will inform public agency decision-makers and the general public of the significant environmental effects of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project (Section 15121(a)).

The County of San Diego is the project applicant and Lead Agency, and the City is a Responsible Agency, pursuant to the CEQA statute and guideline requirements. Both the County and City will rely upon the certified Final EIR for discretionary actions. This EIR was prepared in accordance with the requirements of the County of San Diego EIR Format and General Content Requirements (County of San Diego 2016), CEQA (California Public Resources Code, Section 21000 et seq.), and the CEQA Guidelines (14 California Code of Regulations (CCR) Section 15000 et seq.). Since the project is located within the City, the City's CEQA significance determination thresholds are utilized in the impact assessment portion of the EIR contained in Chapters 2.0 and 3.0 (City of San Diego 2016).

An EIR was determined by the County to be the appropriate CEQA document for the proposed project as changes to the General Plan, Community Plan and zoning have been specified at a level of detail that allows for a more specific project-focused review and it would apply to a specific future development on the project site. In response to this environmental determination, a Notice of Preparation (NOP) was released for public review on September 10, 2018 for a 30-day public review period, which closed on October 10, 2018. The NOP public review period was then extended 10 days and closed on October 19, 2018. Two scoping meetings were held (September 25, 2018, and October 15, 2018). Scoping meeting comments and associated comment letters received during the NOP public review period are included as Appendix A to this EIR. The Draft EIR has been assigned Office of Planning and Research, State Clearinghouse number 2018091016. This EIR addresses CEQA-related comments received on the NOP.

The CEQA process provides several opportunities for public input at three points during environmental evaluation: (1) during scoping of an EIR, (2) during public review of the completed Draft EIR, and (3) during public hearings held on the project by decision-making bodies. As part of the preparation of the Draft EIR, the first of these outreach efforts was undertaken as noted above and was

completed in fall 2018. The second outreach effort occurred when the Draft EIR was released for public review in September 2019.

This EIR will be made available for review by members of the public and public agencies for 45 days to provide comments "on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated," as stated in CEQA Guidelines Section 15204. The County will consider written comments received on the EIR in making its decision whether to certify the EIR as complete and in compliance with CEQA, and also whether to approve or deny the project. Environmental considerations and economic and social factors may be weighed to determine the most appropriate course of action. If the EIR is certified and the project approved, agencies with permitting authority over all or portions of the project may use the EIR as the basis for their evaluation of environmental effects of the project and approval or denial of applicable permits.

As a Responsible Agency under CEQA, the City will use the information included in this EIR to consider potential impacts on the physical environment associated with the proposed project. With a recommendation from the City Planning Commission, City Council will consider the certified EIR as part of the GPA, CPA and rezone review and approval process, in accordance with CEQA Guidelines Section 15096. If the GPA, CPA and rezone are approved by the City Council, the County Board of Supervisors will conduct a public hearing to consider/approve the DDA and Ground Lease for the future residential development.

1.5.1 Matrix of Project Approvals/Permits

Required project approvals are summarized in **Table 1-1**. The County and City are working in conjunction to coordinate the CEQA and project review and approval process. As the designated Lead Agency, the County is responsible for carrying out a portion of the project and preparing this EIR in consultation with the City, as a Responsible Agency. As described above, the decision to approve the proposed project is within the purview of both the County Board of Supervisors and the City Council, as summarized below.

Table 1-1
Matrix of Project Approvals/Permits

Permit Type/Action	Approving Agency
Demolition Contract Approval and EIR Certification	County Board of Supervisors
Certified EIR Consideration (Section 15096 of State CEQA Guidelines)	City Planning Commission and City Council
General Plan Amendment, Community Plan Amendment and Rezone Approval	City Planning Commission and City Council
Ground Lease Approval and DDA Approval	County of San Diego Board of Supervisors
Local Coastal Plan Amendment Approval	California Coastal Commission

Any future project specific development review/approval on the site will be conducted by the City. If the future proposed development of the site is consistent with requirements of the amended CMCP, the City review of the future development project will be ministerial in accordance with SDMC Section 112.0501.

1.5.2 Related Environmental Review & Consultation Requirements

The proposed project is located within the City and within the Clairemont Mesa Community Planning Area; therefore, the City is a Responsible Agency under CEQA and will take action on the GPA, CPA and rezone.

Pursuant to California Government Code 65352.3, Native American consultation was initiated on September 28, 2018 and concluded on December 28, 2018. Correspondence related to that consultation process is contained in Appendix J to this EIR.

1.6 Project Inconsistencies with Applicable Regional and General Plans

A number of plans, regulations and ordinances apply to the proposed project and were considered during the preparation of the CPA. In particular, the County General Plan, City General Plan, and CMCP. Other plans and regulations were also reviewed, including the SDMC, Regional Water Quality Control Board's (RWQCB) San Diego Basin Plan, National Pollution Discharge Elimination System (NPDES), San Diego Municipal Storm Water Permit, Regional Air Quality Strategy (RAQS) and the State Implementation Plan (SIP). Additionally, the SANDAG's San Diego Forward: The Regional Plan, Climate Action Plan, and The proposed project's compliance with these plans and ordinances is evaluated throughout the EIR with discussion in Chapters 2.0 and 3.0.

The County is proposing to amend the General Plan, CMCP and rezone the property to allow for residential use of the site and the future development of up to 404 multifamily residential units on the project site, which is currently inconsistent with the residential policies of the CMCP.

1.7 List of Past, Present, and Reasonably Anticipated Future Projects in the Project Area

Cumulative projects in the vicinity of the proposed project were identified through a search of City development applications and ongoing project construction, conducted at the time of the analysis began and the NOP was published in September 2018. These cumulative projects form the setting for the cumulative analysis presented in this EIR. Cumulative projects are summarized in the following **Table 1-2**:

Table 1-2
Cumulative Projects List

Project ID	Project*	Address	Project Description	Status
257308	Balboa Restaurant	6395 Balboa Ave	Proposed restaurant with drive-thru to replace existing Valvoline oil changer	~~Application never submitted.~~ PTS# 634180, SDP, application deemed complete 6/18/19.
130696	3023 Bunker Hill	3023 Bunker Hill St	Develop 16 commercial condominiums in an existing building on a 0.45-acre site	Application expired 2008
327976	Jefferson Pacific Beach*	4275 Mission Bay Dr.	Demolish 36,000 SF of retail space and construction of three stories of residential units over ground floor retail and underground parking. Per developer site, 172 apartment units and 14,000 SF of retail space.	Under construction
535100	HTH Clairemont CUP	5331 Mount Alifan Dr	High Tech High is proposing to provide educational services to a maximum of 1,636 students in grades TK-12	Application withdrawn.

Project ID	Project*	Address	Project Description	Status
—	HTH*	5331 Mount Alifan Dr	High Tech High is proposing to provide educational services to a maximum of 1,110 students in grades TK-12; 9th grade enrollment began in 2018 (100 students)	Project will occur under existing CUP
113039	Balboa Mesa Center	5937 Balboa Ave	Develop 17 residential for rent units (w/affordable units) and 2,095 additional SF of commercial space to the existing commercial building	Application expired
421571	Stevenson Property VTM/SDP	4520 Pocahontas Ave	Develop 52 single family residential units	Constructed and occupied
388165	Mount Acadia CUP TPM*	3560 Mount Acadia Blvd	Demolish an existing commercial building and construct a 59,472 SF residential care facility and a 5,672 SF retail building	Approved. Building not yet demolished
489476	The Summit at MB – EOT*	3139 Clairemont Dr	Develop approximately 499 residential units which will replace an existing 323-unit apartment complex.	Approved. Building not yet demolished
530427	Fairfield Marriott Suites CDP*	4345 Mission Bay Dr	Demolish existing buildings and develop a 106-unit hotel	Approved. Buildings not yet demolished
—	Lindbergh-Schweitzer Elementary School*	4133 Mount Albertine Avenue	Relocate existing Kavod Charter School from Cubberley Elementary School to the existing Schweitzer Campus	Under construction through January 1, 2024
—	Clairemont Mesa Community Plan Update	Planning Area	Community Plan Update	Plan update ongoing

Project ID	Project*	Address	Project Description	Status
—	Morena Pump Station and Pipelines (Pure Water San Diego)	Sherman St., Morena Blvd., Clairemont Dr, Genesee Ave through University City to the NCWRP on Eastgate Mall.	Construction of wastewater treatment plant, two 10.7-mile wastewater pipelines and two 3.5-mile water pipelines	Under construction
—	Mid-Coast Trolley Construction	North of the Old Town Transit Center to UTC Transit Center	Light rail line construction	Under construction
—	Morena Corridor Specific Plan	Western Clairemont Mesa and Linda Vista CPAs	Specific Plan for pedestrian-oriented village with mixed-use and employment adjacent to trolley stations.	~~Final EIR circulated Feb 2019.~~ Adopted.
—	Montgomery-Gibbs Executive Airport Master Plan	3750 John J Montgomery Dr, San Diego, CA 92123	Airport master plan	NOP of PEIR distributed February 2019
—	Naval Fuel Pipe Relocation	Fuel line extends 17 miles from Naval Base Point Loma to Marine Corps Air Station Miramar	Repair relocation of a section of the Miramar Pipeline	Environmental Assessment under preparation

* Project taken into consideration in the traffic impact analysis based on its ability to affect the project's study area.

1.8 Growth-Inducing Impacts

Pursuant to CEQA Guidelines Section15126.2(d)), the following growth inducement analysis is required:

> *Discuss ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth (a major expansion of a waste water treatment plan might, for example, allow for more construction in service areas). Increases in the population may tax existing community services facilities, requires construction of new facilities that could cause significant environmental effects. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.*

The City General Plan (2008) notes that "population in San Diego will grow whether or not the Draft General Plan is adopted …" and although a number of the General Plan policies are in place to "… encourage business, education, employment and workforce development … preserve and protect valuable employment land, especially prime industrial land, from conversion to other uses … and facilitate expansion and new growth of high quality employment opportunities in the city", the lack of affordable housing has become a critical issue in the city and region, which may require changes in existing land use designations to provide for additional affordable housing. The General Plan incorporates the previously adopted City of Villages strategy, which notes that a "village" is a place where residential, commercial, employment, and civic uses are present and integrated, and are characterized by compact mixed-use area, that are pedestrian-friendly and linked to the regional transit system (City of San Diego 2008). Based on Government Code Section 65300, the General Plan serves as a comprehensive, long-term plan for physical development of the City and, by definition, is intended to manage and address future growth in the City. Implementation of the City of Villages strategy relies on the future designation and development of village sites through community plan updates or amendments. Future development of the project site would incorporate the City of Villages strategies, allow for affordable infill housing located near existing transit and assist with achieving the City's Climate Action Plan goals.

The City's community plans are intended to implement the General Plan. The proposed project would amend the CMCP to allow multifamily residential development of the project site and require development standards to guide future development. The project would also amend the site's land use designation in the General Plan for consistency with the amended CMCP.

There are existing utilities including water, sewer, storm drainage, and power to serve the existing development and proposed project. Implementation of the

proposed project would not require an expansion or new construction of utilities or public services to accommodate the new development.

Proposed site access changes are intended to accommodate planned traffic and provide an improved multi-modal system and are not anticipated to induce growth. Overall, these infrastructure changes would not remove obstacles to growth or induce growth beyond planned.

Based on the forecasted population for the adopted CMCP stated above, the population in the project area will grow whether or not the proposed project is approved. The proposed project would encourage more affordable housing in the CMCP area on a site that is suitable for this type of growth because it is located in a planned TPA, within an existing developed area with access to services, and served by existing utilities. Therefore, the proposed project would provide comprehensive planning for the management of population growth and necessary economic expansion to support development efforts. In addition, the proposed project would allow an appropriate balance of managed population, housing, and economic growth to accommodate community development while maintaining related community and environmental standards.

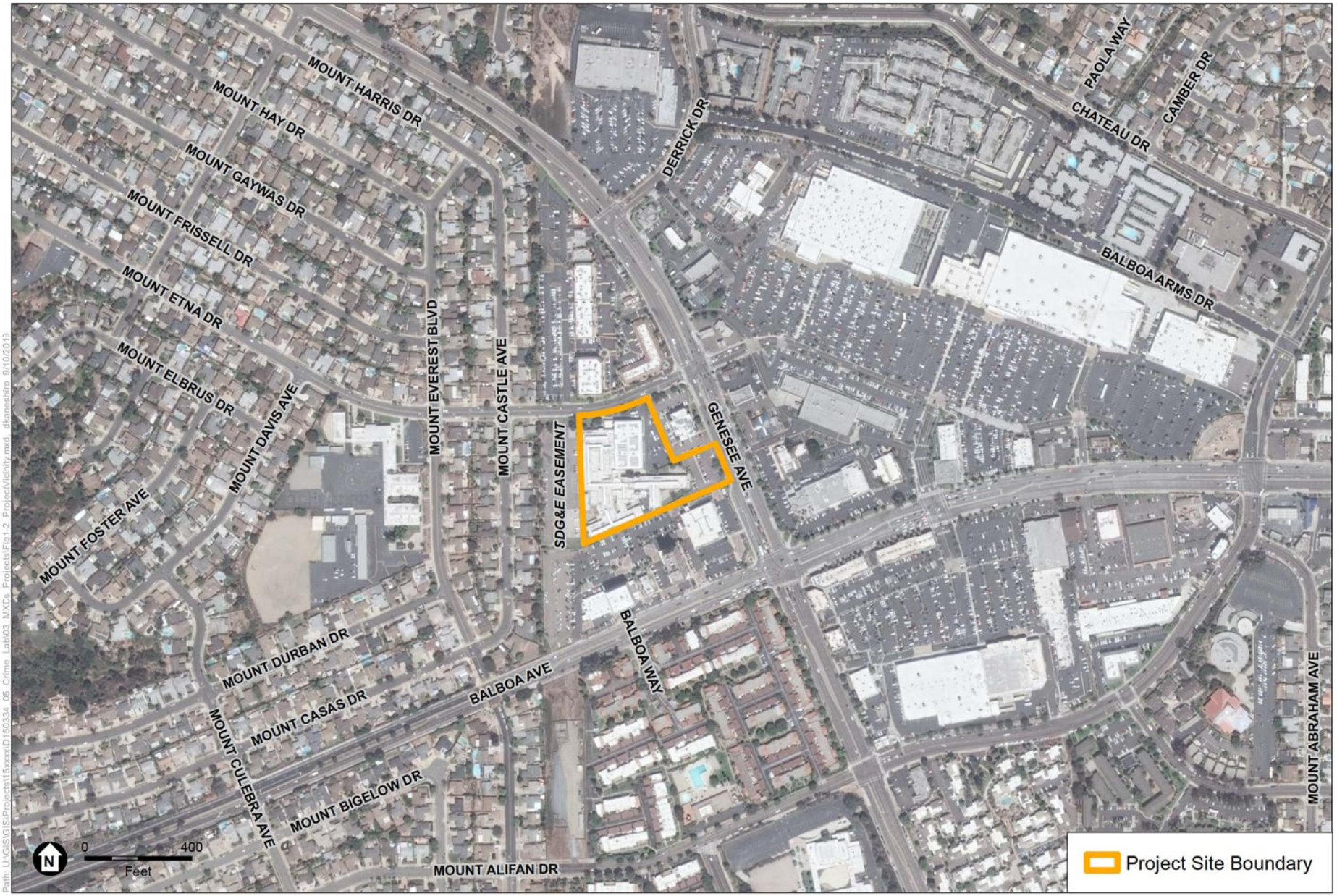
In summary, Clairemont Mesa is an urbanized community. According to the adopted CMCP, future development of the vacant residential land and redevelopment opportunities could result in an additional 1,100 dwelling units (not including mixed-use development), totally 33,000 dwelling units or a three percent increase over the existing housing stock in the 15 years after the existing Community Plan was adopted in 1989 (City of San Diego 2011). The ongoing CMCP update anticipates extensive growth of all land use types in the Clairemont Mesa planning area, including residential housing. The CMCP Update EIR to be prepared by the City as Lead Agency will evaluate the impacts associated with this anticipated growth.

SOURCE: ESRI; SanGIS 2015

Mt. Etna Community Plan Amendment and Rezone Project

Figure 1-1
Regional Location

ESA

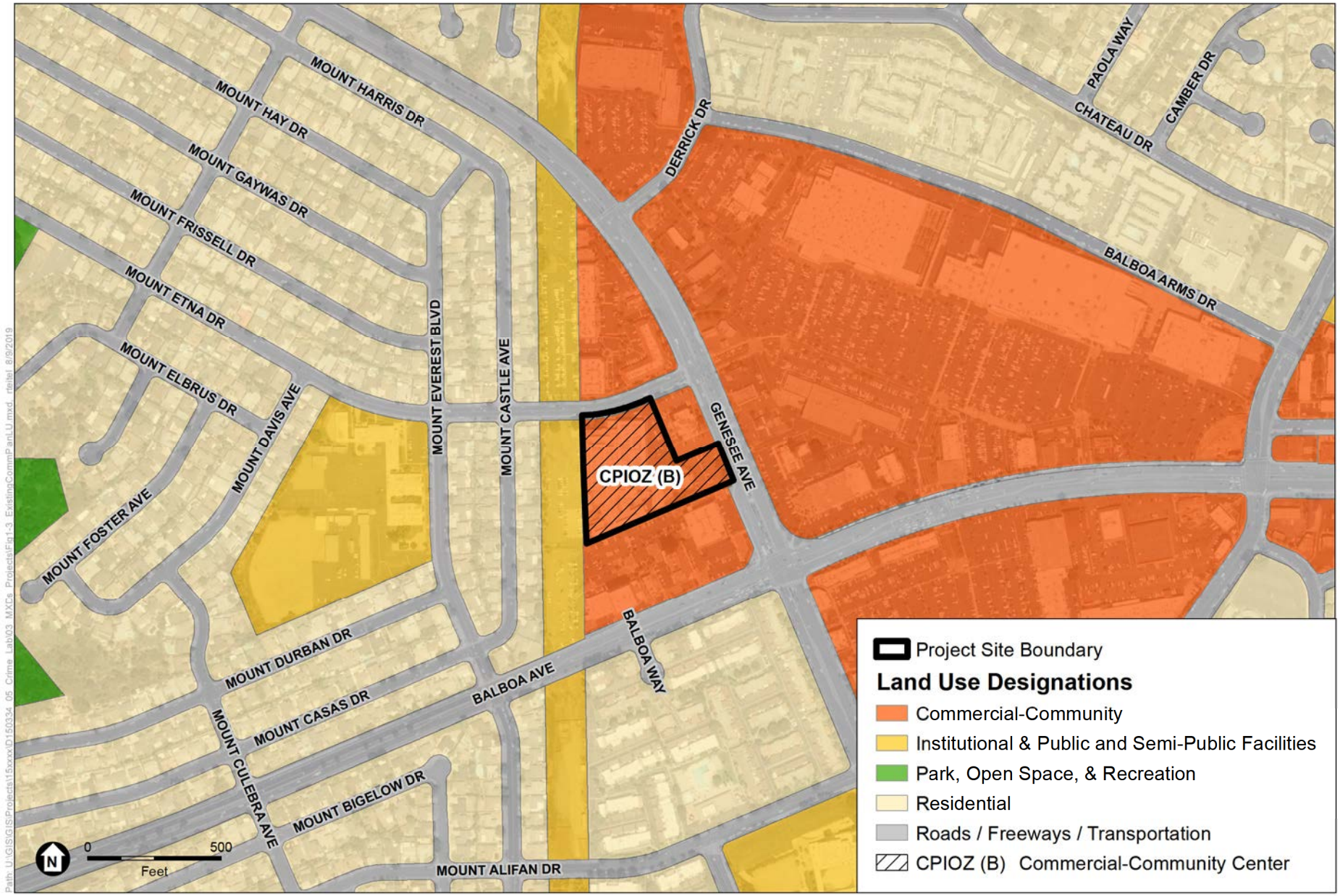


SOURCE: Google Earth, 2019; ESA, 2019.

Mt. Etna Community Plan Amendment and Rezone Project

Figure 1-2
Project Vicinity

ESA

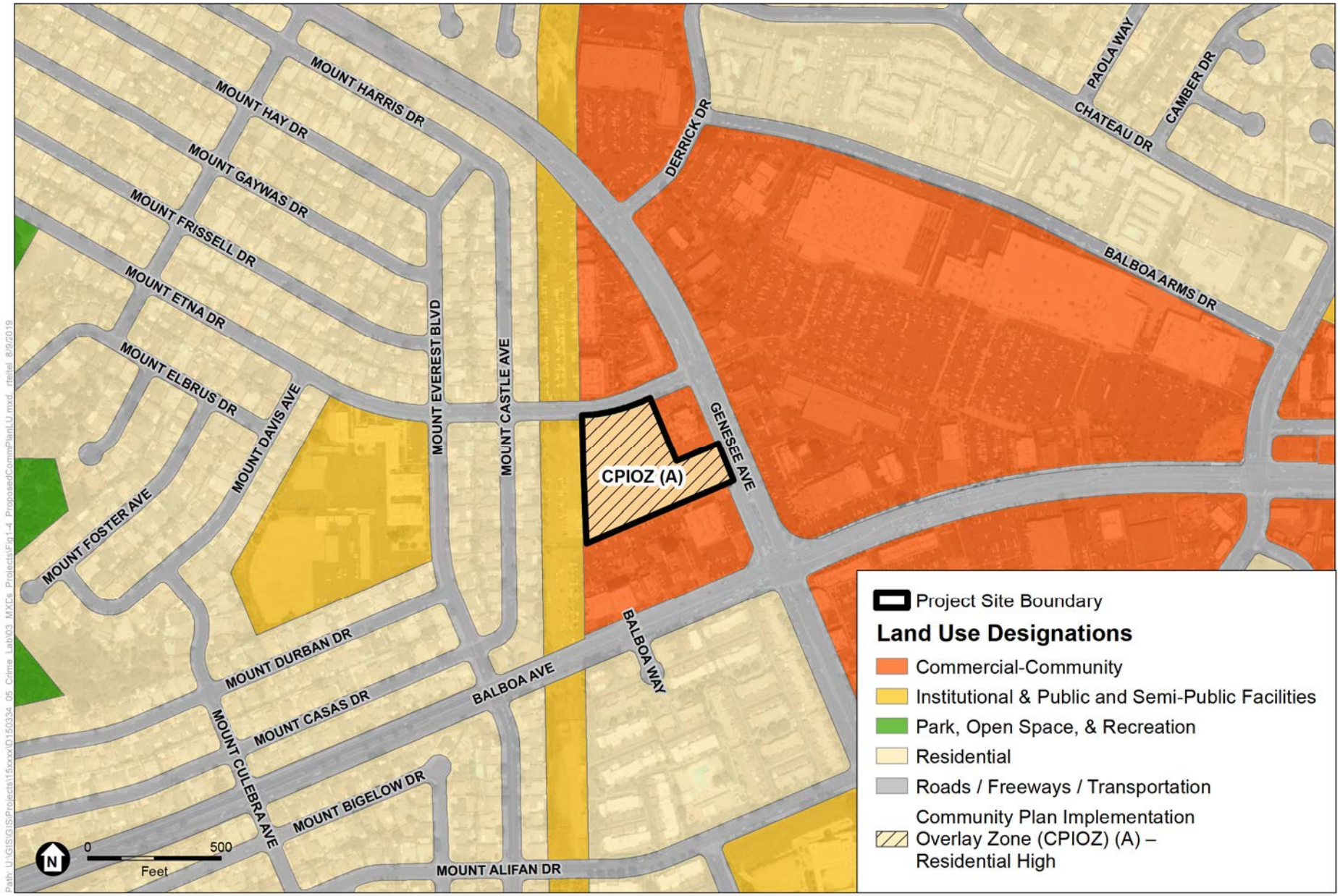


SOURCE: Google Earth, 2019; SanGIS, 2018; ESA, 2019.

Mt. Etna Community Plan Amendment and Rezone Project

Figure 1-3
Existing Clairemont Mesa Community Plan
Land Use Designations

ESA

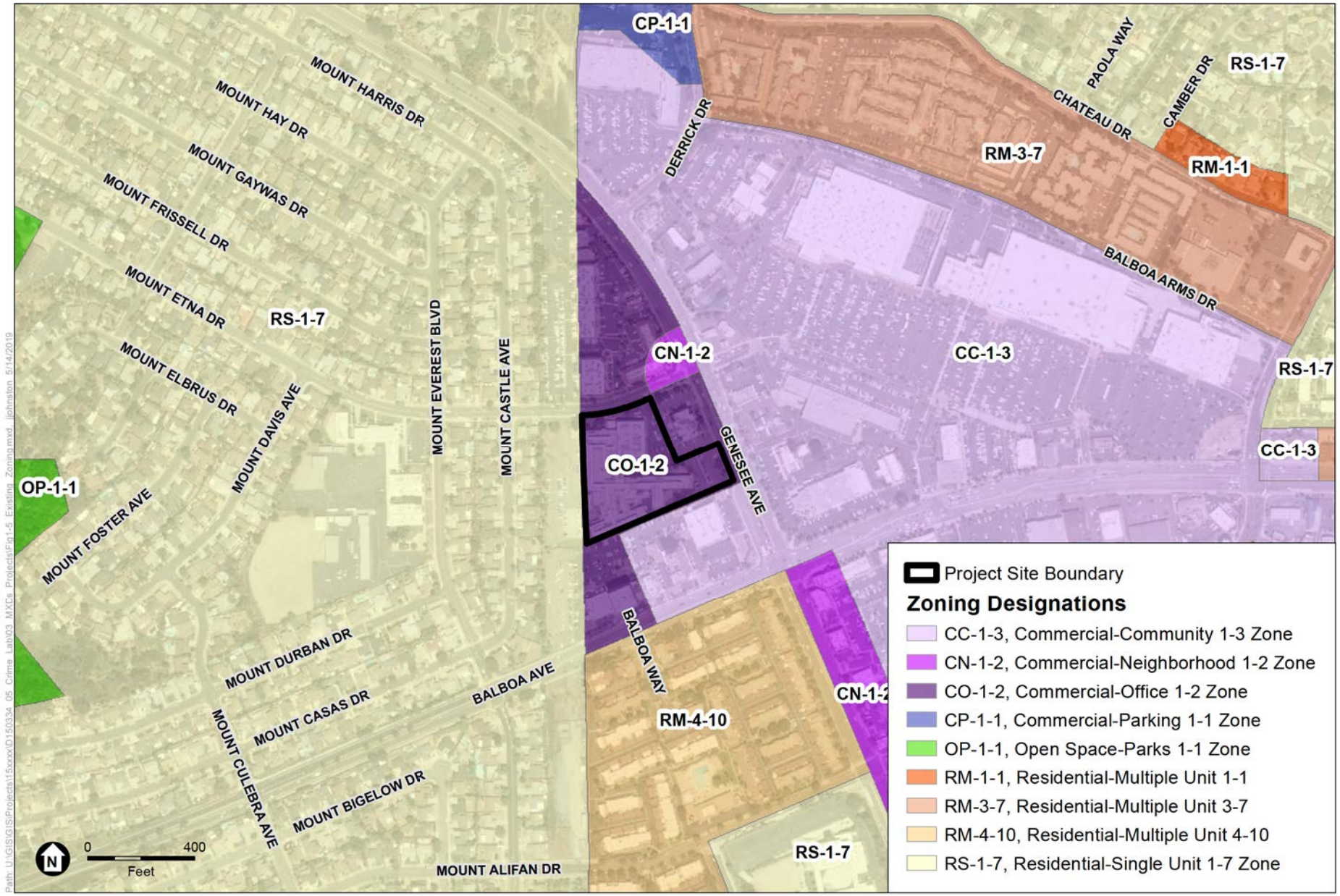


SOURCE: Google Earth, 2019; SanGIS, 2018; ESA, 2019.

Mt. Etna Community Plan Amendment and Rezone Project

Figure 1-4
Proposed Clairemont Mesa Community Plan
Land Use Designations

ESA

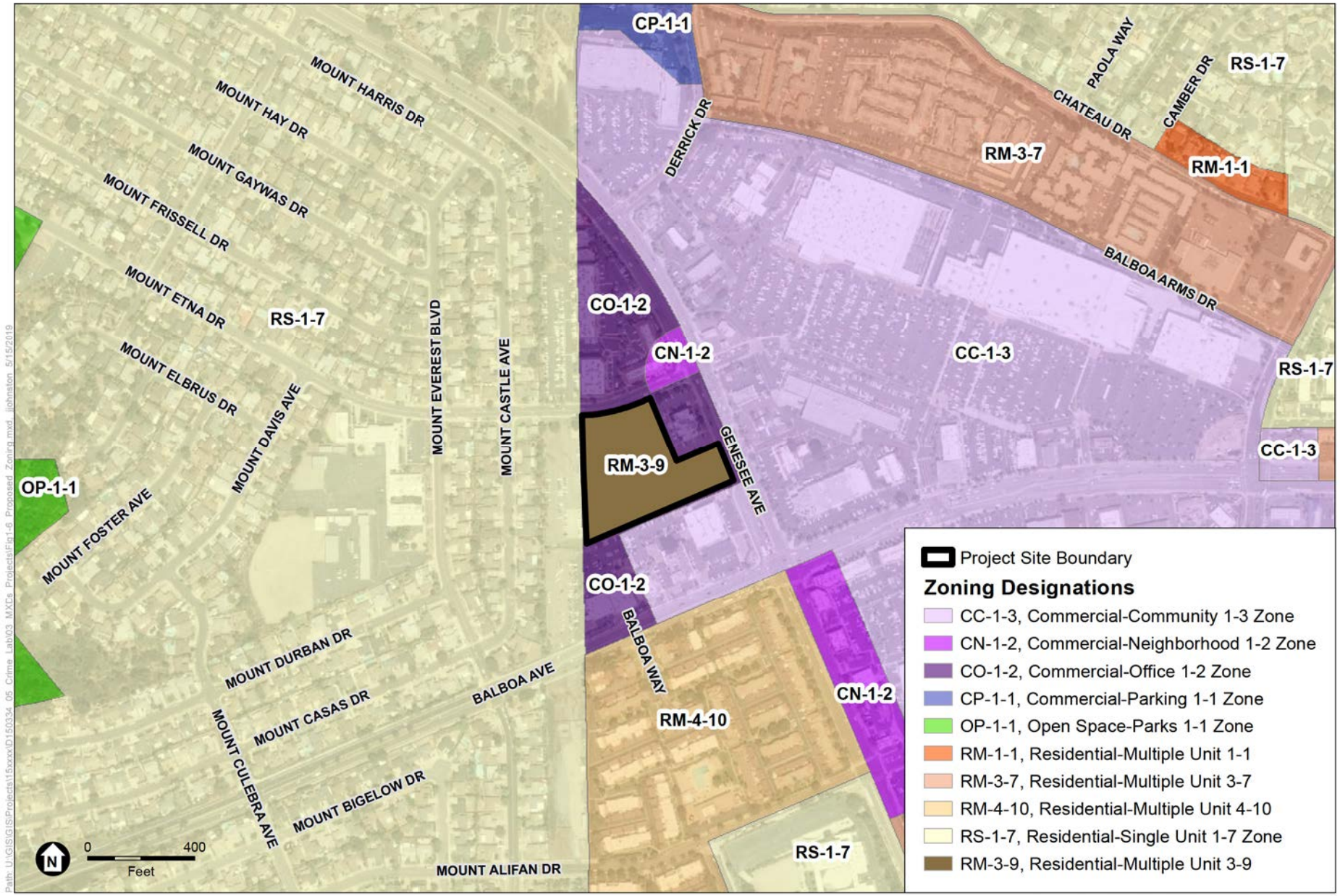


SOURCE: Google Earth, 2019; SanGIS, 2019; ESA, 2019.

Mt. Etna Community Plan Amendment and Rezone Project

Figure 1-5
Existing Zoning

ESA

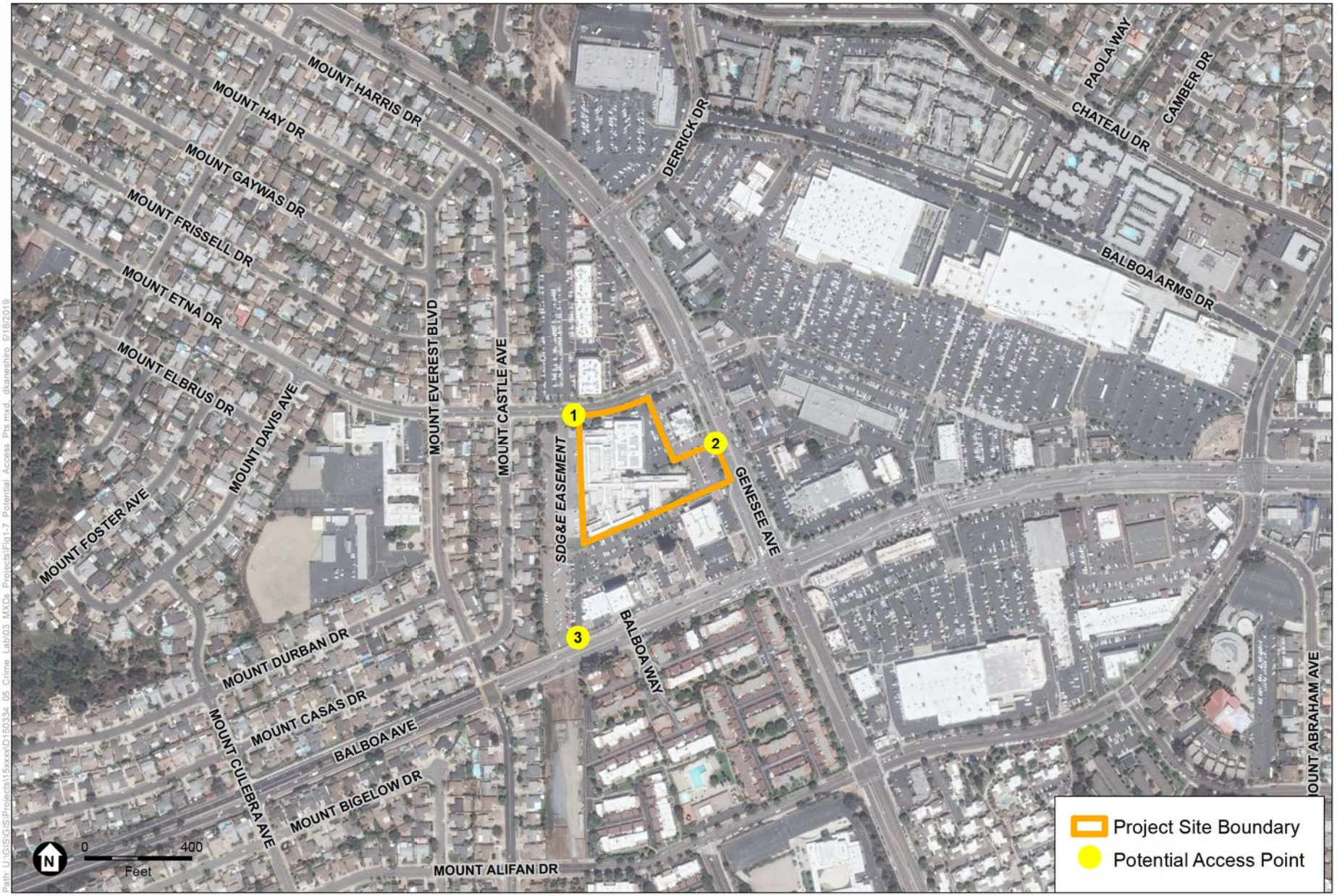


SOURCE: Google Earth, 2019; SanGIS, 2019; ESA, 2019.

Mt. Etna Community Plan Amendment and Rezone Project

Figure 1-6
Proposed Zoning

ESA



SOURCE: Google Earth, 2019; ESA, 2019.

Mt. Etna Community Plan Amendment and Rezone Project

Figure 1-7
Potential Access Points

ESA

CHAPTER 2.0 SIGNIFICANT ENVIRONMENTAL EFFECTS OF THE PROJECT

This chapter of the EIR provides discussions of those issue areas for which project implementation would result in either (1) significant impacts that cannot be avoided and/or (2) significant impacts that can be avoided, reduced, or minimized through mitigation measures that would be implemented by the proposed project. Sections include Section 2.1, Air Quality; 2.2, Hazards and Hazardous Materials; 2.3, Noise and Vibration; and 2.4, Transportation.

Transportation and Traffic would result in significant and unavoidable impacts. Air Quality, Hazards and Hazardous Materials, Noise and Vibration, and Transportation and Traffic include mitigation that would reduce project impacts to less than significant.

Each environmental issue area describes the following topics.

- Existing conditions
- Regulatory framework
- Analysis of project effects and determination as to significance
- Cumulative impacts
- Significance of impacts prior to mitigation
- Mitigation (if applicable)
- Conclusion

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2.1 Air Quality

This section addresses air emissions generated by construction and operation of the proposed project. The analysis also addresses consistency of the project with air quality policies set forth by the San Diego County Air Pollution Control District (SDAPCD) and the City of San Diego (City). The analysis of project-generated air emissions focuses on whether the project would cause an exceedance of an ambient air quality standard or a SDAPCD significance threshold. Details regarding the air quality analysis are provided in Appendix D of this EIR.

Comments related to air quality received during the public comment period for the Notice of Preparation (NOP) included concerns related to dust from construction and pollution from the rezone of the project site. These concerns have been considered and addressed, as applicable, in the following evaluation of the project's potential to create air quality impacts. The NOP and all comment letters received in response to the NOP are included in Appendix A of this EIR.

2.1.1 Existing Conditions

The project site is located in the San Diego Air Basin (Air Basin), which is within the jurisdiction of SDAPCD. The Air Basin is located in the southwest portion of California and encompasses San Diego County. The Air Basin covers 4,260 square miles with topography varying from beaches on the west coast to mountains and desert in the eastern portion.

The Pacific Ocean influences the weather in the San Diego region with semi-permanent high-pressure systems resulting in dry, warm summers and mild, occasionally wet winters. The average temperature ranges from the mid-40s to the high-90s with most of the County's precipitation falling between November and April. Average precipitation ranges from approximately 10 inches at the coast to over 30 inches in the mountains with the desert regions of the County receiving between 4 to 6 inches annually (County of San Diego 2007).

2.1.1.1 Criteria Air Pollutants

Certain air pollutants have been recognized to cause notable health problems and consequential damage to the environment either directly or in reaction with other pollutants, due to their presence in elevated concentrations in the atmosphere. These air pollutants have been identified and regulated as "criteria air pollutants" by the United States Environmental Protection Agency (USEPA) as a result of the specific standards, or criteria which have been adopted for them, and are subject to emissions control requirements adopted by Federal, State and local regulatory agencies. The criteria air pollutants include ozone (O_3), volatile organic compounds (VOCs), nitrogen dioxide (NO_2), carbon monoxide

(CO) sulfur dioxide (SO_2): respirable particulate matter (PM10) and fine particulate matter (PM2.5), and lead (Pb).

A brief description of the criteria air pollutants and their health effects are provided below:

- **Ozone**: Ozone is considered a photochemical oxidant, which is a chemical that is formed when VOCs and nitrogen oxides (NO_X), both by-products of fuel combustion, react in the presence of ultraviolet light. Ozone is considered a respiratory irritant and prolonged exposure can reduce lung function, aggravate asthma, and increase susceptibility to respiratory infections. Children and those with existing respiratory diseases are at greatest risk from exposure to ozone.
- **Volatile Organic Compounds**: VOCs are organic chemical compounds of carbon and are not "criteria" pollutants themselves; however, some VOCs contribute, with NOx, to form ozone, and are regulated to prevent the formation of ozone (USEPA 2017a). Other sources of VOCs include evaporative emissions from paints and solvents, the application of asphalt paving, and the use of household consumer products such as aerosols (CARB 2016a). Adverse effects on human health are not caused directly by VOCs, but rather by reactions of VOCs to form secondary pollutants, such as ozone.
- **Nitrogen Dioxide:** NO_2 is also a by-product of fuel combustion and is formed both directly as a product of combustion and in the atmosphere through the reaction of nitrogen oxide (NO) with oxygen. NO_2 is a respiratory irritant and may affect those with existing respiratory illness, including asthma. NO_2 can also increase the risk of respiratory illness.
- **Carbon Monoxide:** CO is a product of fuel combustion. CO is an odorless, colorless gas. It affects red blood cells in the body by binding to hemoglobin and reducing the amount of oxygen that can be carried to the body's organs and tissues. CO can cause health effects to those with cardiovascular disease and can also affect mental alertness and vision.
- **Sulfur Dioxide:** SO_2 is a colorless, reactive gas that is produced from the burning of sulfur-containing fuels such as coal and oil and by other industrial processes. Generally, the highest concentrations of SO_2 are found near large industrial sources. SO_2 is a respiratory irritant that can cause narrowing of the airways leading to wheezing and shortness of breath. Long-term exposure to SO_2 can cause respiratory illness and aggravate existing cardiovascular disease.
- **Particulate Matter (PM10 and PM2.5):** Particulate matter (PM) is a mixture of solid particles and liquid droplets found in the air (USEPA 2018b). Some particles, such as dust, dirt, soot, or smoke, are large or dark enough to be seen with the naked eye while other particles are so

small they can only be detected using an electron microscope (USEPA 2018b). PM10 are inhalable respirable particles with diameters that are generally 10 micrometers and smaller; PM2.5 are fine inhalable particles with diameters that are generally 2.5 micrometers and smaller (PM2.5) (USEPA 2018b). Thus, PM2.5 comprises a portion or a subset of PM10. Sources of PM10 emissions include dust from construction sites, landfills and agriculture, wildfires and brush/waste burning, industrial sources, and wind-blown dust from open lands (CARB 2017a). Sources of PM2.5 emissions include combustion of gasoline, oil, diesel fuel, or wood (CARB 2017a). PM10 and PM2.5 may be either directly emitted from sources (primary particles) or formed in the atmosphere through chemical reactions of gases (secondary particles) such as SO_2, NO_X, and certain organic compounds (CARB 2017a). PM_{10} and $PM_{2.5}$ can increase susceptibility to respiratory infections and can aggravate existing respiratory diseases such as asthma and chronic bronchitis. $PM_{2.5}$ is considered to have the potential to lodge deeper in the lungs. Diesel particulate matter is classified a carcinogen.

- **Lead (Pb):** Lead (Pb) in the atmosphere occurs as particulate matter. With the phase-out of leaded gasoline, large manufacturing facilities are the sources of the largest amounts of lead emissions. Lead has the potential to cause gastrointestinal, central nervous system, kidney and blood diseases upon prolonged exposure. Lead is also classified as a probable human carcinogen.

National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) have been set at levels considered safe to protect public health, including the health of sensitive populations such as asthmatics, children, and the elderly with a margin of safety; and to protect public welfare, including protection against decreased visibility and damage to animals, crops, vegetation, and buildings. **Table 2.1-1** shows the current NAAQS and CAAQS for each criteria pollutant.

2.1.1.2 Toxic Air Contaminants

Toxic air contaminants (TACs) are generally known or suspected to cause serious health problems, with no corresponding ambient air quality standard. TACs are also defined as an air pollutant that may increase a person's risk of developing cancer and/or other serious health effects. Other factors, such as the chemical's amount, toxicity, how it is released into the air, weather, and terrain, all influence whether hazardous to human health. TACs are emitted by a variety of industrial processes such as petroleum refining, electric utility and chrome plating operations, commercial operations such as gasoline stations and dry cleaners, and motor vehicle exhaust and may exist as PM10 and PM2.5 or as vapors (gases). TACs include metals, other particles, gases absorbed by particles, and certain vapors from fuels and other sources.

Table 2.1-1
Ambient Air Quality Standards

Pollutant	Average Time	California Standards[a]		National Standards[b]		
		Concentration[c]	Method[d]	Primary[c,e]	Secondary[c,f]	Method[g]
O_3[h]	1 Hour	0.09 ppm (180 µg/m^3)	Ultraviolet Photometry	—	Same as Primary Standard	Ultraviolet Photometry
	8 Hour	0.070 ppm (137 µg/m^3)		0.070 ppm (137 µg/m^3)		
NO_2[i]	1 Hour	0.18 ppm (339 µg/m^3)	Gas Phase Chemi-luminescence	100 ppb (188 µg/m^3)	None	Gas Phase Chemi-luminescence
	Annual Arithmetic Mean	0.030 ppm (57 µg/m^3)		53 ppb (100 µg/m^3)	Same as Primary Standard	
CO	1 Hour	20 ppm (23 mg/m^3)	Non-Dispersive Infrared Photometry (NDIR)	35 ppm (40 mg/m^3)	None	Non-Dispersive Infrared Photometry (NDIR)
	8 Hour	9.0 ppm (10mg/m^3)		9 ppm (10 mg/m^3)		
SO_2[j]	1 Hour	0.25 ppm (655 µg/m^3)	Ultraviolet Fluorescence	75 ppb (196 µg/m^3)	—	Ultraviolet Fluorescence; Spectrophotometry (Pararosaniline Method)[g]
	3 Hour	—		—	0.5 ppm (1300 µg/m^3)	
	24 Hour	0.04 ppm (105 µg/m^3)		0.14 ppm (for certain areas)[j]	—	
	Annual Arithmetic Mean	—		0.030 ppm (for certain areas)[j]	—	
PM10[k]	24 Hour	50 µg/m^3	Gravimetric or Beta Attenuation	150 µg/m^3	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	20 µg/m^3		—		
PM2.5[k]	24 Hour	No Separate State Standard		35 µg/m^3	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	12 µg/m^3	Gravimetric or Beta Attenuation	12.0 µg/m^3 [k]	15 µg/m^3	

Pollutant	Average Time	California Standards[a]		National Standards[b]		
		Concentration[c]	Method[d]	Primary[c,e]	Secondary[c,f]	Method[g]
Lead[l,m]	30 Day Average	1.5 µg/m^3	Atomic Absorption	—	—	High Volume Sampler and Atomic Absorption
	Calendar Quarter	—		1.5 µg/m^3 (for certain areas)[m]	Same as Primary Standard	
	Rolling 3-Month Average[m]	—		0.15 µg/m^3		
Visibility Reducing Particles[n]	8 Hour	Extinction coefficient of 0.23 per kilometer — visibility of 10 miles or more (0.07 — 30 miles or more for Lake Tahoe) due to particles when relative humidity is less than 70 percent. Method: Beta Attenuation and Transmittance through Filter Tape.		No Federal Standards		
Sulfates (SO_4)	24 Hour	25 µg/m^3	Ion Chromatography			
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m^3)	Ultraviolet Fluorescence			
Vinyl Chloride[l]	24 Hour	0.01 ppm (26 µg/m^3)	Gas Chromatography			

NOTES:

a California standards for ozone, carbon monoxide (except 8-hour Lake Tahoe), sulfur dioxide (1 and 24 hour), nitrogen dioxide, and particulate matter (PM10, PM2.5, and visibility reducing particles), are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.

b National standards (other than ozone, particulate matter, and those based on annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over 3 years, is equal to or less than the standard. For PM10, the 24 hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 micrograms/per cubic meter (µg/m^3) is equal to or less than one. For PM2.5, the 24 hour standard is attained when 98 percent of the daily concentrations, averaged over 3 years, are equal to or less than the standard.

c Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25°C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.

d Any equivalent procedure which can be shown to the satisfaction of the California Air Resources Board to give equivalent results at or near the level of the air quality standard may be used.

e National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.

f National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.

Pollutant	Average Time	California Standards[a]		National Standards[b]		
		Concentration[c]	Method[d]	Primary[c,e]	Secondary[c,f]	Method[g]

g Reference method as described by the USEPA. An “equivalent method” of measurement may be used but must have a “consistent relationship to the reference method” and must be approved by the USEPA.

h On October 1, 2015, the national 8-hour ozone primary and secondary standards were lowered from 0.075 to 0.070 ppm.

i To attain the 1-hour national standard, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 ppb.

j On June 2, 2010, a new 1-hour SO_2 standard was established and the existing 24-hour and annual primary standards were revoked. To attain the 1-hour national standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO_2 national standards (24-hour and annual) remain in effect until 1 year after an area is designated for the 2010 standard, except that in areas designated non-attainment for the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved.

k On December 14, 2012, the national annual PM2.5 primary standard was lowered from 15 $\mu g/m^3$ to 12.0 $\mu g/m^3$.

l The California Air Resources Board has identified lead and vinyl chloride as 'toxic air contaminants' with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.

m The national standard for lead was revised on October 15, 2008 to a rolling 3-month average. The 1978 lead standard (1.5 $\mu g/m^3$ as a quarterly average) remains in effect until 1 year after an area is designated for the 2008 standard, except that in areas designated non-attainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.

n In 1989, the California Air Resources Board converted both the general statewide 10-mile visibility standard and the Lake Tahoe 30-mile visibility standard to instrumental equivalents, which are "extinction of 0.23 per kilometer" and "extinction of 0.07 per kilometer" for the statewide and Lake Tahoe Air Basin standards, respectively.

SOURCE: CARB 2016.

TAC emissions can be damaging to human health and to the environment. Human exposure to TAC emissions at sufficient concentrations and durations can result in cancer, poisoning, and rapid onset of sickness, such as nausea or difficulty in breathing. Other less measurable effects include immunological, neurological, reproductive, developmental, and respiratory problems. TACs deposited onto soil or into water bodies affect ecological systems and eventually human health through consumption of contaminated food. The carcinogenic potential of TACs is a particular public health concern because many scientists currently believe that there is no "safe" level of exposure to carcinogens. Any exposure to a carcinogen poses some risk of contracting cancer.

The public's exposure to TACs is a significant public health issue in California. The Air Toxics "Hotspots" Information and Assessment Act is a State law requiring facilities to report emissions of TACs to air districts including the amounts of TACs emissions, the location, the concentrations to which the public is exposed, and the resulting health risks.

The State Air Toxics Program (Assembly Bill 2588) identified over 200 TACs, including the 188 TACs identified in the Clean Air Act. USEPA has assessed this expansive list of toxics and identified 21 TACs as Mobile Source Air Toxics (MSATs). MSATs are compounds emitted from highway vehicles and non-road equipment. Some toxic compounds are present in fuel and are emitted to the air when the fuel evaporates or passes through the engine unburned. Other toxics are emitted from the incomplete combustion of fuels or as secondary combustion products. Metal air toxics also result from engine wear or from impurities in oil or gasoline. USEPA also extracted a subset of these 21 MSAT compounds that it now labels as the six priority transportation MSATs: benzene, formaldehyde, acetaldehyde, diesel particulate matter/diesel exhaust organic gases, acrolein, and 1,3-butadiene.

Within the San Diego Air Basin, excluding diesel particulates, the incremental cancer risk from air toxics has been reduced by approximately 70 percent since 1989. As of 2014, the estimated risk was 345-in-one million for Chula Vista and 394-in-one million for El Cajon, down from 481- and 545-in-one million, respectively, in 1989 (SDAPCD 2018).

Diesel Particulate Matter

According to the 2006 California Almanac of Emissions and Air Quality, the majority of the estimated health risks from TACs can be attributed to relatively few compounds, the most important being particulate matter from the exhaust of diesel-fueled engines, i.e., diesel particulate matter (DPM). DPM differs from other TACs in that it is not a single substance, but rather a complex mixture of hundreds of substances.

Diesel exhaust is composed of two phases, gas and particle, and both phases contribute to the health risk. The gas phase is composed of many of the urban hazardous air pollutants, such as acetaldehyde, acrolein, benzene, 1,3-butadiene, formaldehyde and polycyclic aromatic hydrocarbons. The particle phase is also composed of many different types of particles by size or composition. Fine and ultra-fine diesel particulates are of the greatest health concern, and may be composed of elemental carbon with adsorbed compounds such as organic compounds, sulfate, nitrate, metals and other trace elements. Diesel exhaust is emitted from a broad range of diesel engines; the on road diesel engines of trucks, buses and cars and the off-road diesel engines that include locomotives, marine vessels and heavy-duty equipment. Although DPM is emitted by diesel-fueled internal combustion engines, the composition of the emissions varies depending on engine type, operating conditions, fuel composition, lubricating oil, and whether an emission control system is present.

The most common exposure to DPM is breathing the air that contains diesel exhaust. The fine and ultra-fine particles are respirable (similar to PM2.5), which means that they can avoid many of the human respiratory system defense mechanisms and enter deeply into the lung. Exposure to DPM comes from both on-road and off-road engine exhaust that is either directly emitted from the engines or lingering in the atmosphere.

Diesel exhaust causes health effects from both short-term or acute exposures, and long-term chronic exposures. The type and severity of health effects depends upon several factors including the amount of chemical exposure and the duration of exposure. Individuals also react differently to different levels of exposure. There is limited information on exposure to just DPM but there is enough evidence to indicate that inhalation exposure to diesel exhaust causes acute and chronic health effects.

Acute exposure to diesel exhaust may cause irritation to the eyes, nose, throat and lungs, some neurological effects such as lightheadedness. Acute exposure may also elicit a cough or nausea as well as exacerbate asthma. Chronic exposure to DPM in experimental animal inhalation studies have shown a range of dose-dependent lung inflammation and cellular changes in the lung and immunological effects. Based upon human and laboratory studies, there is considerable evidence that diesel exhaust is a likely carcinogen. Human epidemiological studies demonstrate an association between diesel exhaust exposure and increased lung cancer rates in occupational settings.

DPM contributes significantly to ambient air risk levels but cannot be measured directly since it is comprised of many individual compounds and cannot be analyzed as a single compound. However, CARB has estimated the excess

cancer risk from diesel particulate matter in California in 2014 as 460 in a million (down 68% from the 1990 risk of 1600 in a million). (SDAPCD 2018).

2.1.1.3 Regional Air Quality

The project site is located in the Air Basin, within the jurisdiction of SDAPCD, which is required, pursuant to the federal and state Clean Air Acts, to reduce emissions of criteria air pollutants which do not meet federal and state ambient air quality standards (NAAQS and CAAQS) in the Air Basin. Areas that do not meet the NAAQS or the CAAQS for a particular pollutant are considered to be "nonattainment areas" for that pollutant. **Table 2.1-2** provides a summary of the attainment status of the San Diego Air Basin with respect to the federal and state standards.

Table 2.1-2
San Diego Air Basin Attainment Status

Pollutant	Federal Designation	State Designation
O_3 (1-hour standard)	Attainment[a]	Nonattainment
O_3 (8-hour – 2008)	Nonattainment	Nonattainment
CO	Attainment	Attainment
PM10	Unclassified[b]	Nonattainment
PM2.5	Attainment	Nonattainment
NO_2	Attainment	Attainment
SO_2	Attainment	Attainment
Lead (Pb)	Attainment	Attainment
Sulfates	(no federal standard)	Attainment
Hydrogen Sulfide	(no federal standard)	Unclassified
Visibility Reducing Particles	(no federal standard)	Unclassified

NOTES:

[a] The federal 1-hour standard of 0.12 ppm was in effect from 1979 through June 15, 2005. The revoked standard is referenced here because it was employed for such a long period and because this benchmark is addressed in state implementation plans is designated unclassifiable/attainment.

[b] At the time of designation, if the available data does not support a designation of attainment or nonattainment, the area is designated as unclassified in this table.

SOURCE: CARB 2018.

As shown in Table 2.1-2, the Air Basin is currently classified as a nonattainment area for the 2008 federal 8-hour ozone standard. In addition, the Air Basin is classified as a nonattainment area for the California standards for ozone (8-hour ozone standard and 1-hour ozone standard), PM10, and PM2.5.

2.1.1.4 Local Air Quality

SDAPCD maintains a network of ten air quality monitoring stations located throughout the Air Basin to measure ambient pollutant concentrations. The San Diego - Kearny Villa Road Station is the closest station to the project site, located approximately 3.85 miles southwest of the project site, and therefore, is considered most representative station for the project site. The station provides concentrations of 8-hour and 1-hour ozone, PM2.5, PM10, and NO_2. CO and SO_2 have not been monitored in San Diego County since 2012 due to their continued attainment status. The most recent five years of pollutant concentration data available from this monitoring station is from years 2014 to 2018, as summarized in **Table 2.1-3**.

2.1.1.5 Sensitive Receptors

Certain population groups, such as children, elderly, and acutely and chronically ill persons (especially those with cardio-respiratory diseases), are considered more sensitive to the potential effects of air pollution than others. The nearest sensitive land uses to the project site include the following:

- Residences located 150 feet west of the project site across the SDG&E easement parking lot,
- Residences located 170 feet northwest of the project site north of Mount Etna Drive and to the west of the commercial plaza,
- Residences located 400 feet south of the project site south of Balboa Avenue,
- The nearest school, Mount Everest Academy, is located 550 feet west of the project site, west of Mount Everest Boulevard, and
- Horizon Christian Academy is located 1,100 feet south of the project site, south of Mount Alifan Drive.

Other air quality sensitive receptors located father away from the project site would be less impacted by Project emissions because pollutant concentrations reduce with distance from the source (CARB 2017) (i.e., project demolition and building construction at the project site).

Table 2.1-3
Ambient Air Quality Data (San Diego – Kearny Villa Road Station)

Pollutant/Standard	2014	2015	2016	2017	2018
O_3 (1-hour)					
Maximum Concentration (ppm)	0.099	0.077	0.087	0.097	0.102
Days > CAAQS (0.09 ppm)	1	0	0	2	1
O_3 (8-hour)					
Maximum Concentration (ppm)	0.082	0.070	0.075	0.084	0.077
Days > CAAQS (0.070 ppm)	4	0	3	6	5
Days > NAAQS (0.070 ppm)	4	0	3	6	5
NO_2 (1-hour)					
Maximum Concentration (ppm)	0.051	0.051	0.053	0.054	0.045
98th Percentile Concentration (ppm)	0.045	0.044	0.042	0.041	0.038
Days > CAAQS (0.18 ppm)	0	0	0	0	0
NO_2 (Annual)					
Annual Arithmetic Mean (0.030 ppm)	0.010	0.009	0.009	0.009	0.008
PM10 (24-hour)					
Maximum Concentration (µg/m^3)	39	37	35	47	38
Days > CAAQS (50 µg/m^3)	0	0	0	0	0
Days> NAAQS (150 µg/m^3)	0	0	0	0	0
PM10 (Annual)					
Annual Arithmetic Mean (20 µg/m^3)	19.5	16.7	*	17.6	18.4
PM2.5 (24-hour)					
Maximum Concentration (µg/m^3)	20.2	25.7	19.4	27.5	32.2
98th Percentile Concentration (µg/m^3)	17.2	15.7	13.0	17.6	21.6
Days > NAAQS (35 µg/m^3)	0	0	0	0	0
PM2.5 (Annual)					
Annual Arithmetic Mean (12 µg/m^3)	8.1	7.2	7.5	7.9	8.3

ppm = parts per million; µg/m^3 = micrograms per cubic meter
* means there was insufficient data to determine the value.
CO and SO_2 concentrations are not available for San Diego County between 2013 and 2017.
SOURCE: CARB 2019.

2.1.2 Regulatory Setting

2.1.2.1 Federal

Clean Air Act

The federal Clean Air Act of 1963 was the first federal legislation regarding air pollution control and has been amended numerous times in subsequent years,

with the most recent amendments occurring in 1990. At the federal level, USEPA is responsible for implementation of certain portions of the Clean Air Act including mobile source requirements. Other portions of the Clean Air Act, such as stationary source requirements, are implemented by state and local agencies.

The Clean Air Act establishes NAAQS and specifies future dates for achieving compliance. The Clean Air Act also mandates that the state submit and implement a State Implementation Plan for areas not meeting these standards. These plans must include pollution control measures that demonstrate how the standards will be met. The 1990 amendments to the Clean Air Act identify specific emission reduction goals for areas not meeting the NAAQS. These amendments require both a demonstration of reasonable further progress toward attainment and incorporation of additional sanctions for failure to attain or to meet interim milestones.

The sections of the Clean Air Act which are most applicable to the project include Title I (Nonattainment Provisions) and Title II (Mobile Source Provisions). Title I requirements are implemented for the purpose of attaining NAAQS for the following criteria pollutants: O_3, NO_2, CO, SO_2, PM10, PM2.5, and lead.

In addition to criteria pollutants, Title I also includes air toxics provisions which require USEPA to develop and enforce regulations to protect the public from exposure to airborne contaminants that are known to be hazardous to human health. In accordance with Section 112, USEPA established National Emission Standards for Hazardous Air Pollutants (NESHAPs). The list of hazardous air pollutants (HAPs), or air toxics, includes specific compounds that are known or suspected to cause cancer or other serious health effects.

Title II requirements pertain to mobile sources, such as cars, trucks, buses, and planes. Reformulated gasoline, automobile pollution control devices, and vapor recovery nozzles on gas pumps are a few of the mechanisms USEPA uses to regulate mobile air emission sources. The provisions of Title II have resulted in tailpipe emission standards for vehicles which have strengthened in recent years to improve air quality. For example, the standards for NO_X emissions have been lowered substantially, and the specification requirements for cleaner burning gasoline are more stringent.

2.1.2.2 State

California Clean Air Act

The California Clean Air Act, signed into law in 1988, requires all areas of the State to achieve and maintain the CAAQS by the earliest practical date. The CAAQS apply to the same criteria pollutants as the federal Clean Air Act but also include State-identified criteria pollutants, which include sulfates, visibility-

reducing particles, hydrogen sulfide, and vinyl chloride. The California Air Resources Board (CARB) has primary responsibility for ensuring the implementation of the California Clean Air Act, responding to the federal Clean Air Act planning requirements applicable to the state, and regulating emissions from motor vehicles and consumer products within the state. Table 2.1-1 shows the CAAQS currently in effect for each of the criteria pollutants, as well as, the other pollutants recognized by the state. As shown in Table 2.1-1, the CAAQS are more stringent than the NAAQS for most of the criteria air pollutants.

Health and Safety Code Section 39607(e) requires CARB to establish and periodically review area designation criteria. Table 2.1-3 provides a summary of the attainment status of the San Diego Air Basin with respect to the state standards. The Air Basin is designated as attainment for the California standards for CO, NO_2, SO_2, sulfates, and lead, and unclassified for hydrogen sulfide and visibility-reducing particles.

California Air Resources Board Air Quality and Land Use Handbook

CARB published the *Air Quality and Land Use Handbook* in April 2005 to serve as a general guide for considering impacts to sensitive receptors from facilities that emit TAC emissions (CARB 2005). In 2017, as a technical supplement to the Handbook, CARB published *Technical Advisory; Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways* (CARB 2017b). The recommendations provided therein are voluntary and do not constitute a requirement or mandate for either land use agencies or local air districts. The goal of the guidance document is to protect sensitive receptors, such as children, the elderly, acutely ill, and chronically ill persons, from exposure to TAC emissions. Some examples of CARB's siting recommendations include the following: (1) avoid siting sensitive receptors within 500 feet of a freeway, urban road with 100,000 vehicles per day, or rural roads with 50,000 vehicles per day; (2) avoid siting sensitive receptors within 1,000 feet of a distribution center (that accommodates more than 100 trucks per day, more than 40 trucks with operating transport refrigeration units per day, or where transport refrigeration unit operations exceed 300 hours per week); and (3) avoid siting sensitive receptors within 300 feet of any dry cleaning operation using perchloroethylene and within 500 feet of operations with two or more machines.

California Air Resources Board On-Road and Off-Road Vehicle Rules

In 2004, CARB adopted an Airborne Toxic Control Measure (ATCM) to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to diesel PM and other TACs. The measure applies to diesel-fueled commercial vehicles with gross vehicle weight ratings greater than 10,000 pounds that are licensed to operate on highways, regardless of where they are registered. This

measure does not allow diesel-fueled commercial vehicles to idle for more than 5 minutes at any given time.

In 2008, CARB approved the Truck and Bus regulation to reduce NO_X, PM10, and PM2.5 emissions from existing diesel vehicles operating in California. The requirements were amended in 2010 and apply to nearly all diesel fueled trucks and busses with a gross vehicle weight rating greater than 14,000 pounds. For the largest trucks in the fleet, those with a gross vehicle weight rating greater than 26,000 pounds, there are two methods to comply with the requirements. The first way is for the fleet owner to retrofit or replace engines, starting with the oldest engine model year, to meet 2010 engine standards, or better. This is phased over 8 years, starting in 2015 and would be fully implemented by 2023, meaning that all trucks operating in the State subject to this option would meet or exceed the 2010 engine emission standards for NO_X and PM by 2023. The second option, if chosen, requires fleet owners, starting in 2012, to retrofit a portion of their fleet with diesel particulate filters achieving at least 85 percent removal efficiency, so that by January 1, 2016 their entire fleet is equipped with diesel particulate filters. However, diesel particulate filters do not typically lower NO_X emissions. Thus, fleet owners choosing the second option must still comply with the 2010 engine emission standards for their trucks and busses by 2020.

In addition to limiting exhaust from idling trucks, in 2007, CARB promulgated emission standards for off-road diesel construction equipment of greater than 25 horsepower such as bulldozers, loaders, backhoes and forklifts, as well as many other self-propelled off-road diesel vehicles. The regulation aims to reduce emissions by installation of diesel soot filters and encouraging the retirement, replacement, or repower of older, dirtier engines with newer emission-controlled models. Implementation is staggered based on fleet size (which is the total of all off-road horsepower under common ownership or control), with the largest fleets to begin compliance by 2014. Each fleet must demonstrate compliance through one of two methods. The first option is to calculate and maintain fleet average emissions targets, which encourages the retirement or repowering of older equipment and rewards the introduction of newer cleaner units into the fleet. The second option is to meet the Best Available Control Technology (BACT) requirements by turning over or installing Verified Diesel Emission Control Strategies (e.g., engine retrofits) on a certain percentage of its total fleet horsepower. The compliance schedule requires that BACT turn overs or retrofits be fully implemented by 2023 in all equipment in large and medium fleets and across 100 percent of small fleets by 2028.

2.1.2.3 Regional

San Diego County Air Pollution Control District

SDAPCD has the primary responsibility for the control of air pollution from all sources other than emissions from motor vehicles, which falls under the responsibility of CARB and USEPA. Each air district must prepare and adopt an air quality management plan (AQMP) or regional air quality strategy (RAQS) to demonstrate how the district will achieve attainment for the CAAQS and NAAQS. SDAPCD first prepared and submitted the 1991 RAQS to address San Diego County's nonattainment status for ozone; the latest revision was in 2016. The RAQS relies on information from the CARB, San Diego Association of Governments (SANDAG), and the SANDAG Transportation Control Measures Plan (TCM) (County of San Diego 2007). The 2016 Revision of the RAQS contains an overview of statutory requirements, air quality assessment, recent and projected future emission reduction rates, adopted and proposed control measures, overview of incentive programs, review of TCM, and reaffirmation of state emission offset repeal. The RAQS focuses on VOC and NOx, which are both ozone precursors. If a five percent per year reduction of ozone precursors is not feasible, then alternative strategies must be identified and every feasible control measure implemented (SDAPCD 2016).

SDAPCD is responsible for planning, implementing, and enforcing federal and state ambient standards in the Air Basin. The following rules and regulations would apply to construction that occurs pursuant to SPAPCD and relevant to the proposed project:

> ***Regulation II: Permits; Rule 20.2: New Source Review – Non-Major Sources.*** Applies to any new or modified stationary source, to any new or modified emission unit and to any relocated emission unit that is not considered a major stationary source. As applied to new or modified sources, the rule requires (1) the use of BACT, where the emissions of PM10, NOx, VOC, or SOx would increase by 10 pounds per day or more; (2) an air quality impact analysis if the emissions of PM10, NOx, VOC, SOx, or lead exceed designated trigger levels; and (3) establishes public noticing requirements prior to issuance of a permit.
>
> ***Regulation IV: Prohibitions; Rule 50: Visible Emissions.*** Prohibits any activity causing air contaminant emissions darker than 20 percent opacity for more than an aggregate of 3 minutes in any consecutive 60-minute time period. In addition, Rule 50 prohibits any diesel pile-driving hammer activity causing air contaminant emissions for a period or periods aggregating more than 4 minutes during the driving of a single pile.
>
> ***Regulation IV: Prohibitions; Rule 51: Nuisance.*** Prohibits the discharge, from any source, of such quantities of air contaminants or other

materials that cause or have a tendency to cause injury, detriment, nuisance, annoyance to people and/or the public, or damage to any business or property.

Regulation IV: Prohibitions; Rule 55: Fugitive Dust. Regulates fugitive dust emissions from any commercial construction or demolition activity capable of generating fugitive dust emissions, including active operations, open storage piles, and inactive disturbed areas, as well as track-out and carry-out onto paved roads beyond a project site.

Regulation IV: Prohibitions; Rule 67.0: Architectural Coatings. Architectural coatings are regulated under Rule 67.0.1 (Architectural Coatings). Rule 67.0.1 incorporates the tighter VOC limits of the CARB's 2007 Suggested Control Measures and is estimated to reduce VOC emissions in San Diego County by 839.5 tons per year (2.3 tons per day) with a cost-effectiveness of $1.12 per pound of VOC reduced (SDAPCD 2016). Requires manufacturers, distributors, and end users of architectural and industrial maintenance coatings to reduce VOC emissions from the use of these coatings, primarily by placing limits on the VOC content of various coating categories.

Regulation XI: National Emission Standards for Hazardous Air Pollutants; Subpart M, Rule 361.145: Standard for Demolition and Renovation*.* Requires owners and operators of a demolition or renovation activity to provide written notification of planned asbestos stripping or removal to the Control Officer no less than 10 days prior to demolition and/or asbestos removal. A Notification of Demolition and Renovation Form and fee is required with written notification. Procedures for asbestos emission control are provided under Rule 361.145 and must be followed in accordance with this regulation.

Rule 361.145: Requires notification and work practice standards for asbestos removal and demolition, as specified under Rule 40, Code of Federal Regulations 61, Subpart M.

<u>San Diego County Grading, Clearing and Watercourses Ordinance: Section 87.428 Dust Control Measures.</u>

Requires all clearing and grading to be carried out with dust control measures adequate to prevent creation of a nuisance to persons or public or private property. Clearing, grading or improvement plans shall require that measures such as the following be undertaken to achieve this result: watering, application of surfactants, shrouding, control of vehicle speeds, paving of access areas, or other operational or technological measures to reduce dispersion of dust. These project design measures are to be incorporated into all earth disturbing activities to minimize the amount of PM emissions from construction (County of San Diego 2007).

San Diego Association of Governments San Diego Forward: The Regional Plan

In 2015, the SANDAG Board of Directors adopted San Diego Forward: The Regional Plan. This plan combines the Regional Comprehensive Plan (RCP) with the 2050 Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS), adopted in 2012. The Regional Plan identifies the five following strategies to move the San Diego region toward sustainability:

- Focus housing and job growth in urbanized areas where there is existing and planned transportation infrastructure, including transit,
- Protect the environmental and help ensure the success of smart growth land use policies by preserving sensitive habitat, open space, cultural resources, and farmland,
- Invest in a transportation network that gives people transportation choices and reduces greenhouse gas emissions,
- Address the housing needs of all economic segments of the population, and
- Implement the Regional Plan through incentives and collaboration.

Air quality has improved significantly over the past four decades as measured by the decreasing trend in the number of days with an Air Quality Index (AQI) over 100. In particular, the number of days exceeding the federal 2008 ozone standard has dropped from 179 days in 1981 to 12 days in 2014 (SANDAG 2015).

2.1.2.4 Local

City of San Diego General Plan

The Conservation Element of the City of San Diego's General Plan includes goals and policies to improve the air quality conditions within the City and the Air Basin (City of San Diego 2012). Air Quality goals applicable to the proposed project include: "Regional air quality which meets state and federal standards." Applicable policies include:

> **Policy CE-F.4:** Preserve and plant trees, and vegetation that are consistent with habitat and water conservation policies and that absorb carbon dioxide and pollutants.

2.1.3 Analysis of Project Effects and Determination of Significance

For purposes of this EIR, the identified significance thresholds are based on criteria provided in the City of San Diego's CEQA Significance Determination Thresholds (City of San Diego 2016). Accordingly, a significant air quality impact would occur if the project would:

Issue 1: Conflict with or obstruct implementation of the applicable air quality plan;

Issue 2: Violate any air quality standard or contribute substantially to an existing or projected air quality violation;

Issue 3: Result in a cumulatively considerable new increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including release emissions which exceed quantitative thresholds for ozone precursors);

Issue 4: Expose sensitive receptors to substantial pollutant concentrations including air toxics such as diesel particulates. As adopted by the South Coast Air Quality Management District (SCAQMD) in their CEQA Air Quality Handbook (Chapter 4), a sensitive receptor is a person in the population who is particularly susceptible to health effects due to exposure to an air contaminant than is the population at large. Sensitive receptors (and the facilities that house them) in proximity to localized CO sources, toxic air contaminants or odors are of particular concern;

Issue 5: Create objectionable odors affecting a substantial number of people.

2.1.3.1 Conflict with Air Quality Plan

Issue 1: Conflict with or obstruct implementation of the applicable air quality plan.

Impact Analysis

Community Plan Amendment and Rezone

All areas designated as nonattainment are required to prepare plans showing how the area would meet the state and federal air quality standards by its attainment dates. The San Diego RAQS is the region's applicable air quality plan for improving air quality in the Air Basin and attaining federal and state air quality standards. The RAQS relies on information from CARB and SANDAG, including projected growth in the County, which is based in part on local general plans. Therefore, the future development allowed under the Community Plan Amendment and rezone portion of the project would be required to be consistent with the air quality standards outlined in the RAQS.

Air pollutant emissions generated from the construction and operation of future residential development would have the potential to affect implementation of the RAQS. Emissions from construction activities of the future residential development would be minimal, as shown under Issue 2, below. In addition, project construction would comply with SDAPCD Rules and Regulations, including Rules 50, 51, and 55, which forbid visible emissions, nuisance activities, and require fugitive dust control measures, respectively.

The proposed project would allow for a future development that would add 404 dwelling units to the Clairemont Mesa community. Since a CPA is needed, future development would not be consistent with the existing General Plan, and it would not be consistent with the existing assumptions in the RAQS. However, the project is intended to provide an affordable housing option for residents already residing in the area and not draw new residents to the area. The project is intended to accommodate the existing population in accordance with the goals established by the Regional Housing Needs Assessment (RHNA). As discussed in Section 2.8, Population and Housing, the project would result in population growth, however, this growth is accounted for in the City's Housing Element and SANDAG's growth projections, and therefore the project would be consistent with the assumptions in the RAQS. Furthermore, as shown in Issue 2 below, construction and operational emissions of the future development would be minimal, would comply with Rule 67.0, and would be consistent with RAQS. As such, the proposed project would not conflict with or obstruct the implementation of the San Diego RAQS, and impacts would be less than significant.

Site Demolition and Preparation

Air pollutant emissions generated from the demolition of existing structures on the project site and preparation of the site for future residential development would have the potential to affect implementation of the RAQS. However, emissions from site demolition and preparation would be minimal, as shown under Issue 2, below. In addition, project construction would comply with SDAPCD Rules and Regulations, including Rules 50, 51, and 55, which forbid visible emissions, nuisance activities, and require fugitive dust control measures, respectively. As such, the proposed project would not conflict with or obstruct the implementation of the San Diego RAQS, and impacts would be less than significant.

2.1.3.2 Air Quality Standards

Issue 2: Violate any air quality standard or contribute substantially to an existing or projected air quality violation

Ozone, NOx, VOC, CO, SOx, PM10, and PM2.5 are pollutants of concern established by SDAPCD for analysis. SDAPCD does not provide quantitative thresholds for determining the significance of construction or mobile source-related impacts. However, the district does specify Air Quality Impact Analysis (AQIA) trigger levels for new or modified stationary sources (APCD Rules 20.2 and 20.3). If these incremental levels for stationary sources are exceeded, an AQIA must be performed for the proposed new or modified source. Although these trigger levels do not generally apply to mobile sources or general land development projects, for comparative purposes these levels may be used to evaluate the increased emissions which would be discharged to the Air Basin from proposed land development projects. Project-related air quality impacts estimated in this environmental analysis would be considered significant if:

- Regional construction and operational emissions from both direct and indirect sources would exceed any of the following prescribed daily emissions thresholds (City of San Diego 2012):
  - 100 pounds per day for PM10
  - 55 pounds per day for PM2.5
  - 250 pounds per day for NO_X
  - 250 pounds per day for SO_X
  - 550 pounds per day for CO
  - 75 pounds per day for VOC[1]

There are currently no localized significance thresholds for San Diego County.

Impact Analysis

Community Plan Amendment and Rezone

Construction

Construction of the future residential development would have the potential to temporarily generate criteria air pollutants from the operation of heavy-duty construction equipment, such as backhoe, cement mixer, compactor, crane, forklifts, grader, paver, roller, and sweepers; and from vehicle trips generated from workers and haul trucks traveling to and from the project site. In addition, fugitive dust emissions would result from various building construction activities. Construction emissions can vary substantially from day-to-day, depending on the intensity and specific type of construction activity. The maximum daily regional emissions are predicted values for the worst-case day and do not represent the emissions that would actually occur during every day of construction.

Construction of the future development is estimated to begin in June 2021 and continue through October 2022. Project construction activities would include foundations/concrete pour, building construction, paving, and architectural coating. Construction air pollutant emissions were estimated using CalEEMod (Version 2016.3.2) software, an emissions inventory software program. Where project specific information was not provided, CalEEMod defaults were used to determine construction equipment based on the type of construction. The modeling assumes that the proposed future 404 apartment units would include ~~354~~ 404 parking spaces. Landscaping and architectural coating would occur during the finishing activities.

Daily regional criteria air pollutant emissions for the different phases of construction were forecasted based on construction activities, on-road and off-road mobile sources, and fugitive dust emission factors associated with the specific construction activity. Off-road mobile source emissions would result from

[1] Threshold for VOCs based on the threshold of significance for VOCs from the South Coast Air Quality Management District for the Coachella Valley.

the use of heavy-duty construction equipment listed above. The emissions of off-road equipment were estimated using CalEEMod. CalEEMod is based on outputs from the OFFROAD model and EMission FACtor (EMFAC) model, which are emissions estimation models developed by CARB and used to calculate emissions from construction activities, heavy-duty off-road equipment, and on-road vehicles. Activities parameters, such as number of equipment and equipment usage hours were provided by the applicant.

Fugitive dust emissions (using PM10 as a surrogate) during construction activities were estimated in CalEEMod, which are based on the methods described in USEPA's AP-42 Compilation of Air Pollutant Emission Factors. During the application of architectural coatings, evaporation of solvents contained in surface coatings result in VOC emissions. CalEEMod was used to calculate VOC emissions based on the building surface area and the default VOC content provided by SCAQMD or CARB's statewide limits. Asphalt paving of parking areas are another source of VOC emissions. CalEEMod was used to calculate VOC off-gassing emissions based on the parking lot size and default emission factor.

On-road mobile sources also have the potential to generate temporary criteria air pollutant emissions through workers and haul trucks traveling to and from the project site during building construction. Mobile source emissions were calculated using the 2017 EMFAC model (EMFAC2017), recently approved by USEPA. EMFAC2017 "represents [CARB's] current understanding of motor vehicle travel activities and their associated emission levels." Although CARB restricts idling times to no more than 5 minutes at any one location, it was conservatively assumed that truck idling activities would total 15 minutes per trip, representing three separate 5-minute idling occurrences: check-in to the project site or queuing at the site boundary upon arrival, on-site idling during loading/unloading, and check-out of the project site or queuing at the site boundary upon departure.

The results of the criteria air pollutant calculations for the construction of the future residential development under the CPA are presented in **Table 2.1-4**. Detailed calculations for all individual phases are included in Appendix D. As shown, construction emissions do not exceed SDAPCD screening thresholds and therefore regional impacts from construction emissions would be less than significant.

Operation

Operation of the future development would have the potential to generate criteria air pollutants from mobile, stationary, and area (e.g., coatings, consumer products, landscaping) sources, which were calculated for the project's full buildout year. Detailed emissions calculations are provided in Appendix D of this EIR.

Table 2.1-4
Community Plan Amendment and Rezone Maximum Regional Construction Emissions (lbs/day)

Phase	VOC	NOx	CO	SO2	PM10	PM2.5
Foundations/ Concrete Pour	1	6	7	<1	1	<1
Building Construction	1	15	12	<1	3	1
Architectural Coating	62	2	3	<1	1	<1
Paving	2	15	15	<1	1	1
BC/AC/Paving (overlap)	65	33	31	<1	4	2
Max Daily Emissions	**65**	**33**	**31**	**<1**	**4**	**2**
SDAPCD Thresholds	**75**	**250**	**550**	**520**	**100**	**55**
Exceed Thresholds?	No	No	No	No	No	No

Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix D.

SOURCE: ESA 2019.

Daily trip generation rates and VMT for the project were provided by the project-specific Transportation Impact Analysis (Appendix I) and include trips associated with the proposed multi-family residences (Chen-Ryan 2019). The VMT estimate takes into consideration the project's locational characteristics, as an infill project near high quality transit (i.e., transit priority area [TPA]). Natural gas usage factors are based on commercial and residential data from the California Energy Commission, and landscape equipment emissions are based on off-road emission factors from CARB. Emissions from the use of consumer products and the reapplication of architectural coatings are based on data provided in CalEEMod.

The results of the regional operational criteria pollutant emission calculations for VOC, NO_X, CO, SO_X, PM10, and PM2.5 are presented in **Table 2.1-5**. As shown in Table 2.1-5, the operational emissions would not exceed the SDAPCD significance thresholds for any of the criteria pollutants. The majority of emissions come from mobile sources as residents and visitors would travel to and from the project site. Therefore, impacts would be less than significant with regard to the violation of any air quality standards.

Table 2.1-5
Community Plan Amendment and Rezone Estimated Maximum Regional Operational Emissions (pounds per day)

Emission Sources	VOC	NO_X	CO	SO_2	PM10	PM2.5
Area	13	<1	33	<1	<1	<1
Energy	<1	2	1	<1	<1	<1
Mobile	8	8	59	<1	12	3
Total Project	**21**	**10**	**93**	**<1**	**12**	**4**
SDAPCD Thresholds	**75**	**250**	**550**	**250**	**100**	**55**
Exceeds Thresholds?	No	No	No	No	No	No

Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix D of this EIR.

SOURCE: ESA 2019.

Site Demolition and Preparation

The site demolition and preparation portion of the proposed project includes the demolition of the existing unoccupied buildings and related facilities on-site, disposal of the demolition debris, grading of the site, and existing utilities stubbed out to the project site boundary. Site demolition and preparation would have the potential to temporarily generate criteria air pollutants through the operation of heavy-duty construction equipment, such as backhoes, compactors, dumpers, excavators, generators, graders, haul trucks, loaders, rollers, and scrapers; and through vehicle trips generated from workers and haul trucks traveling to and from the project site. In addition, fugitive dust emissions would result from demolition and various earthmoving activities. Construction emissions can vary substantially from day-to-day, depending on the intensity and specific type of construction activity. The maximum daily regional emissions are predicted values for the worst-case day and do not represent the emissions that would actually occur during every day of construction.

Site demolition and preparation is estimated to begin in March 2021 and continue through July 2021. Project construction activities would include demolition, site preparation, grading, drainage/utilities/trenching, foundations/concrete pour, building construction, paving, and architectural coating. Site demolition and preparation air pollutant emissions were estimated using CalEEMod (Version 2016.3.2). The modeling assumes that the existing, vacant 103,500 square-foot (SF) building on-site would be demolished. Where project specific information was not provided, CalEEMod defaults were used to determine construction equipment based on the type of construction.

The results of the criteria air pollutant calculations are presented in **Table 2.1-6**. Detailed calculations for all individual phases are included in Appendix D. As shown, construction emissions do not exceed SDAPCD screening thresholds and therefore regional impacts from construction emissions would be less than significant.

Table 2.1-6
Site Demolition and Preparation Maximum Regional Construction Emissions (lbs/day)

Phase	VOC	NOx	CO	SO2	PM10	PM2.5
Demolition	4	52	26	<1	7	3
Site Preparation	3	31	21	<1	2	1
Grading	2	21	15	<1	1	1
Drainage/Utilities/Trenching	2	14	14	<1	1	1
Max Daily Emissions	**11**	**118**	**76**	**1**	**11**	**6**
SDAPCD Thresholds	**75**	**250**	**550**	**520**	**100**	**55**
Exceed Thresholds?	No	No	No	No	No	No

Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix D.

SOURCE: ESA 2019.

2.1.3.3 Cumulative Increase

Issue 3: Result in a cumulatively considerable new increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including release emissions which exceed quantitative thresholds for ozone precursors)

The project would be considered to be cumulatively considerable if mitigated emissions of ozone precursors (VOC and NOx), PM10, and PM2.5 would exceed City of San Diego's screening thresholds for these pollutants.

Impact Analysis

Community Plan Amendment and Rezone

As detailed under Issue 2 above, the future residential development construction and operation emissions of non-attainment pollutants would be significantly below regulatory thresholds (see Tables 2.1-4 and 2.1-5, respectively, above). Therefore, the project would not result in a cumulatively considerable increase in criteria pollutant emissions related to construction and operation of the future development.

Site Demolition and Preparation

As detailed under Issue 2 in above, site demolition and preparation construction emissions of non-attainment pollutants would be significantly below regulatory thresholds, as shown in Table 2.1-6 above. Therefore, the project would not result in a cumulatively considerable increase in criteria pollutant emissions related to site demolition and preparation.

2.1.3.4 Sensitive Receptors

Issue 4: Expose sensitive receptors to substantial pollutant concentrations including air toxics such as diesel particulates. As adopted by the South Coast Air Quality Management District (SCAQMD) in their CEQA Air Quality Handbook (Chapter 4), a sensitive receptor is a person in the population who is particularly susceptible to health effects due to exposure to an air contaminant than is the population at large. Sensitive receptors (and the facilities that house them) in proximity to localized CO sources, toxic air contaminants or odors are of particular concern.

Impact Analysis

Community Plan Amendment and Rezone

Toxic Air Contaminants

Construction activities would emit DPM from the use of off-road and on-road equipment and haul and vendor trucks. Because DPM is not independently monitored or reported, the analysis uses PM10 as a surrogate for DPM. If the project would emit carcinogenic materials or TACs that exceed the maximum incremental increase in cancer risk of ten-in-one million or an acute or chronic hazard index of 1.0, impacts to sensitive receptors would be significant.

To assess the potential health risk impacts (i.e., cancer, or other acute or chronic conditions) related to TACs exposure from airborne emissions during the project's construction, a refined quantitative health risk assessment (HRA) was prepared. The HRA evaluated the potential for increased health risks for off-site sensitive receptors due to the project construction activities. As health risk is cumulative over the whole construction and operational period, significance is based on the total risk from both the Community Plan Amendment and rezone (and associated future residential development) and site demolition and preparation phases. However, each phase is discussed individually as well as cumulatively below.

The greatest potential for TAC emissions during the project's building construction would be related to DPM tailpipe emissions associated with the operation of heavy-duty equipment during demolition, excavation and grading

activities, building construction, paving and architectural coating. Minor DPM emissions from haul and vendor trucks are also taken into account in the analysis. Construction activities associated with the project would be sporadic, transitory, and short-term in nature.

The operation of the future residential building is not anticipated to result in health risk from operational activities. During long-term operations, TACs could be emitted as part of the periodic maintenance operations, cleaning, painting, etc., periodic visits to the project site from delivery trucks and service vehicles. TAC emissions from periodic maintenance operations, cleaning, painting, etc., are expected to be occasional and result in minimal exposure to off-site and on-site sensitive receptors. Therefore, operational health impacts were evaluated qualitatively in the impact analysis.

Construction-Related Health Risk

The construction HRA was performed in accordance with the revised OEHHA *Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments* (OEHHA Guidance) (OEHHA 2015). The analysis incorporates the estimated construction emissions and dispersion modeling using the USEPA AMS/EPA Regulatory Model (AERMOD) model with meteorological data from the closest SDAPCD meteorological monitoring station (San Diego – Kearny Villa Road Station).

For this risk assessment, AERMOD dispersion model output was converted into specific cancer risks and non-cancer chronic health hazard impacts. Health impacts addressed construction and operational DPM emissions and the effects on nearby sensitive uses (residential). Detailed assumptions, methodology, AERMOD dispersion modeling and HRA calculations are included in Appendix D.

Health risk was calculated for the offsite residential and school receptors within approximately 1,000 feet of the project site. AERMOD was used to quantify concentrations at the offsite receptors. Health risk calculations were performed using a spreadsheet tool consistent with the OEHHA guidance. The spreadsheet tool incorporates the algorithms, equations, and a variable described above as well as in the OEHHA guidance, and incorporates the results of the AERMOD dispersion model. Detailed risk assessment is included as Appendix D.

Table 2.1-7 summarizes the carcinogenic risk and non-carcinogenic risk for the maximum impacted sensitive receptors. As shown in Table 2.1-7, the maximum incremental increase in cancer risk would be up to approximately 14-in-one million for construction risk for residential receptors and 0.4-in-one million for school receptors. Health risk for residential receptors would exceed the SCAQMD significance threshold of 10-in-one million for residential receptors, and therefore, impacts would be potentially significant (**Impact AIR-1**), and

Mitigation Measure AIR-1, detailed below, would be required. The chronic health risk from construction of the project is 0.03 for residential and 0.01 for school receptors, well below the significance threshold of 1. The maximum exposed residential receptor is located in the residential development directly west of the project site. The maximum exposed school receptor is located on the Mount Everest Academy campus located west of the project site across Mount Everest Boulevard. Because health risk is cumulative, the Maximum Impacted Sensitive Receptor represents the cumulative risk from both the CPA and rezone of the project site (including the future residential development) and the site demolition and preparation activities. Table 2.1-7 also provides a breakdown of maximum risk per construction phase and total risk for the CPA and rezone.

Table 2.1-7
Community Plan Amendment and Rezone Maximum Unmitigated Incremental Increase in Risk for Off-Site Sensitive Receptors

Sensitive Receptor	Maximum Cancer Risk (#-in-one million) [a]		Chronic Risk Hazard Index (HI) [b]	
	Residential	**School**	**Residential**	**School**
Foundations/ Concrete Pour	0.73	0.02	0.007	0.001
Building Construction	5.93	0.22	0.011	0.002
Architectural Coating	1.35	0.04	0.003	<0.001
Paving	0.84	0.03	0.016	0.003
Max CPAR[c]	8.82	0.31	0.036	0.007
Cumulative Risk[d]	14.28	0.47	0.03	0.01
Significance Threshold	10	10	1.0	1.0
Exceeds Threshold?	**Yes**	No	No	No

a. Cancer risk values based on actual exposure over the duration of construction activities. The construction risk was calculated assuming a child was born at the beginning of the project construction, and would be exposed during the duration of construction activities. The third trimester exposure was excluded as construction is anticipated to take less than two years and exposure from birth to two years results in greater cancer risk, therefore excluding the third trimester exposure results in a more conservative risk analysis.

b. Chronic risk HI values based on the annual maximum levels of DPM divided by the corresponding DPM reference exposure levels (RELs).

c. Note, totals may not add due to rounding and the fact that for each construction phase the maximum impacted receptor may be different. CPAR = Community Plan Amendment and Rezone

d. Cumulative risk is the total risk from the Community Plan Amendment and Rezone and the Site Demolition and Preparation. Totals from Max CPAR and Max D&P may not add due to rounding and the fact that each individual construction phase may have a different maximum impacted receptor.

SOURCE: ESA 2019. (See Appendix D)

The process of assessing health risks and impacts includes a degree of uncertainty. The level of uncertainty is dependent on the availability of data and the extent to which assumptions are relied upon in cases where the data are

incomplete or unknown. All HRAs rely upon scientific studies in order to reduce the level of uncertainty; however, it is not possible to completely eliminate uncertainty from the analysis. Where assumptions are used to substitute for incomplete or unknown data, it is standard practice in performing HRAs to err on the side of health protection in order to avoid underestimating or underreporting the risk to the public by assessing risk on the most sensitive populations, such as children and the elderly.

Operational-Related Health Risk

TACs could be emitted as part of the periodic maintenance operations, cleaning, painting, etc., periodic visits to the project site from delivery trucks and service vehicles. TAC emissions from periodic maintenance operations, cleaning, painting, etc., are expected to be occasional and result in minimal exposure to off-site and on-site sensitive receptors. If operation of the project requires the use of a stationary emission source (such as an emergency back-up generator), such sources are permitted by SDAPCD, and therefore, would result in risk levels below regulatory thresholds. Therefore, operational TAC emissions are anticipated to be less than significant, and no mitigation is required.

Criteria Air Pollutants

Aside from DPM, the operation of heavy-duty vehicles and construction equipment during the grading and building phases of construction can produce substantial amounts of criteria air pollutants, primarily pre-cursor ozone pollutants (ROG and NOX), CO, NO2, and particulate matter. Since none of these criteria air pollutants would be emitted in sufficient quantity to potentially exceed NAAQS and CAAQS in Table 2.1-4, the emissions are considered minimal, and an ambient air quality analysis was not preformed. Therefore, the project would not expose nearby sensitive receptors to a substantial increase in long-term localized pollutant concentrations and the possible chronic impact on human health would be less than significant.

CO Hotspots

Although the San Diego Air Basin is currently an attainment area for CO, environmental review should also consider the localized health effect of CO. The primary mobile-source pollutant of localized concern is CO. CO is a product of incomplete combustion of fossil fuel; unlike ozone, CO is emitted directly out of a vehicle exhaust pipe. Local mobile-source CO emissions near roadway intersections are a direct function of traffic volume, speed, and delay. Transport of CO is limited since it disperses rapidly with distance from the source under normal meteorological conditions. However, under specific meteorological conditions, CO concentrations near roadways and/or intersections may reach unhealthy levels related to local sensitive land uses such as residential units, hospitals, schools, playgrounds, and childcare facilities. Therefore, CO exhaust

emissions can potentially cause a direct, localized CO “hotspot” impact at or near sensitive receptors. A project would expose sensitive receptors to substantial pollutant concentrations if sensitive receptors are placed near CO hotspots, or if it creates CO hotspots near sensitive receptors; i.e., would result in CO emissions that, when added to the ambient concentrations, would exceed a 1-hour concentration of 20 parts per million (ppm) or an 8-hour average of 9 ppm.

According to the City’s Significance Determination Thresholds (City of San Diego 2016), CO hotspot screening should follow current accepted protocol by CARB and/or SDAPCD. SDAPCD does not have localized significance threshold methodology. Given there are no localized adopted thresholds for CO hotspots, guidance was drawn from the County of San Diego Guidelines for Determining Significance, in that, CO hotspots are found to occur at signalized intersections that operate at or below level of service (LOS) E with peak-hour trips for that intersection exceeding 3,000 trips (County of San Diego 2007). However, the project-specific traffic study (Chen-Ryan 2019) identified that existing and future signalized intersections (without the project) operate at LOS E with peak-hour volumes exceeding 3,000 peak-hour volumes for these intersections. The project, in comparison, would contribute minimal additional peak-hour trips for these intersections (Chen-Ryan 2019). Therefore, the potential for the project to cause or contribute to the formation of off-site CO hotspots are evaluated based on prior dispersion modeling of the four busiest intersections in the South Coast Air Basin that has been conducted by the South Coast Air Quality Management District (SCAQMD) for its CO Attainment Demonstration Plan in the SCAQMD Air Quality Management Plan (AQMP) (SCAQMD 2003).

This analysis compares the project intersections with the greatest peak-hour traffic volumes that would be impacted by the project to the intersections modeled by SCAQMD. Project-impacted intersections with peak-hour traffic volumes that are lower than the intersections modeled by SCAQMD, in conjunction with lower background CO levels, would result in lower overall CO concentrations compared to the SCAQMD modeled values in its AQMP.

SCAQMD conducted CO modeling for the 2003 AQMP for the four worst-case intersections in the Air Basin: (a) Wilshire Boulevard and Veteran Avenue; (b) Sunset Boulevard and Highland Avenue; (c) La Cienega Boulevard and Century Boulevard; and (d) Long Beach Boulevard and Imperial Highway. In the 2003 AQMP CO attainment demonstration, SCAQMD notes that the intersection of Wilshire Boulevard and Veteran Avenue is the most congested intersection in Los Angeles County, with an average daily traffic volume of about 100,000 vehicles per day (SCAQMD 2003). This intersection is located near the on- and off-ramps to Interstate 405 in West Los Angeles. Relevant information from the 2003 AQMP CO attainment demonstration relied upon in this assessment is provided in Appendix D of this EIR. The evidence provided in Table 4-10 of

Appendix V of the 2003 AQMP shows that the peak modeled CO concentration due to vehicle emissions at these four intersections was 4.6 ppm (one-hour average) and 3.2 (eight-hour average) at Wilshire Boulevard and Veteran Avenue.

Based on the proposed project's traffic study (Appendix I) (Chen-Ryan 2019) under future plus project conditions, the intersection of Balboa Avenue and Charger Boulevard would have a maximum traffic volume of approximately 61,846 ADT, which are assumed to operate at very low or idling speeds at a congested roadway intersection. As a result, CO concentrations are expected to be approximately 2.8 (one-hour average) and 2.0 (eight-hour average), which would not exceed the numerical indicators of significance. Total traffic volumes at the maximum impacted intersection would likely have to double to cause or contribute to a CO hotspot impact given that vehicles operating today have reduced CO emissions as compared to vehicles operating in year 2003 when the SCAQMD conducted the AQMP attainment demonstration modeling (SCAQMD 2003). This comparison demonstrates that the project would not contribute to the formation of CO hotspots and that no further CO analysis is required. The impact would be less than significant.

Site Demolition and Preparation

Toxic Air Contaminants

As previously stated, the greatest potential for TAC emissions during the project's building construction would be related to DPM tailpipe emissions associated with the operation of heavy-duty equipment during demolition, excavation and grading activities, building construction, paving and architectural coating. Minor DPM emissions from haul and vendor trucks are also taken into account in the analysis. Construction activities associated with the project would be sporadic, transitory, and short-term in nature.

Construction-Related Health Risk

Table 2.1-8 provides a breakdown of maximum risk per construction phase and total risk for site demolition and preparation activities. As discussed above, significance is based on the cumulative combined risk from site demolition and preparation activities and the CPA and rezone activities (the future residential development). As previously stated and shown in Table 2.1-7, the maximum incremental increase in cancer risk would be up to approximately 14-in-one million for construction risk for residential receptors and 0.4-in-one million for school receptors. Health risk for residential receptors would exceed the SCAQMD significance threshold of 10-in-one million for residential receptors, and therefore, impacts would be potentially significant (**Impact AIR-1**), and **Mitigation Measure AIR-1**, detailed below, would be required.

Table 2.1-8
Site Demolition and Preparation Maximum Unmitigated Incremental Increase in Risk for Off-Site Sensitive Receptors

	Maximum Cancer Risk (#-in-one million)[a]		Chronic Risk Hazard Index (HI)[b]	
Sensitive Receptor	**Residential**	**School**	**Residential**	**School**
Demolition	1.21	0.036	0.035	0.0060
Site Preparation	1.89	0.056	0.028	0.0048
Grading	1.30	0.038	0.019	0.0033
Trenching	1.06	0.031	0.016	0.0028
Max D&P[c]	5.45	0.16	0.098	0.017
Cumulative Risk[d]	14.28	0.47	0.03	0.01
Significance Threshold	10	10	1.0	1.0
Exceeds Threshold?	**Yes**	No	No	No

NOTES:

a. Cancer risk values based on actual exposure over the duration of construction activities. The construction risk was calculated assuming a child was born at the beginning of the project construction, and would be exposed during the duration of construction activities. The third trimester exposure was excluded as construction is anticipated to take less than two years and exposure from birth to two years results in greater cancer risk, therefore excluding the third trimester exposure results in a more conservative risk analysis.

b. Chronic risk HI values based on the annual maximum levels of DPM divided by the corresponding DPM reference exposure levels (RELs).

c. Note, totals may not add due to rounding and the fact that for each construction phase the maximum impacted receptor may be different. D&P = Site Demolition and Preparation

d. Cumulative risk is the total risk from the Community Plan Amendment and Rezone and the Site Demolition and Preparation. Totals from Max CPAR and Max D&P may not add due to rounding and the fact that each individual construction phase may have a different maximum impacted receptor. See discussion for Table 2.1-7 for details

SOURCE: ESA 2019. (See Appendix D)

The process of assessing health risks and impacts includes a degree of uncertainty. The level of uncertainty is dependent on the availability of data and the extent to which assumptions are relied upon in cases where the data are incomplete or unknown. All HRAs rely upon scientific studies in order to reduce the level of uncertainty; however, it is not possible to completely eliminate uncertainty from the analysis. Where assumptions are used to substitute for incomplete or unknown data, it is standard practice in performing HRAs to err on the side of health protection in order to avoid underestimating or underreporting the risk to the public by assessing risk on the most sensitive populations, such as children and the elderly.

Criteria Air Pollutants

Aside from DPM, the operation of heavy-duty vehicles and construction equipment during the grading and building phases of construction can produce

substantial amounts of criteria air pollutants, primarily pre-cursor ozone pollutants (ROG and NOX), CO, NO2, and particulate matter. Since none of these criteria air pollutants would be emitted in sufficient quantity to potentially exceed NAAQS and CAAQS in Table 2.1-6, the emissions are considered minimal, and an ambient air quality analysis was not preformed. Therefore, the project would not expose nearby sensitive receptors to a substantial increase in long-term localized pollutant concentrations, and the possible chronic impact on human health would be less than significant.

2.1.3.5 Odor Analysis

Issue 5: Create objectionable odors affecting a substantial number of people.

Impact Analysis

Community Plan Amendment and Rezone

Construction

Potential sources that may emit odors during construction activities of the future residential building include the use of architectural coatings and solvents. SDAPCD Rule 67.0 (Architectural Coatings) limits the amount of VOCs from architectural coatings and solvents. Construction equipment typically is not a source of odors. Odors from the combustion of diesel fuel would be minimized by complying with the CARB ATCM that limits diesel-fueled commercial vehicle idling to 5 minutes at any given location. The project would also comply with SDAPCD Rule 51 (Nuisance), which prohibits the emissions of nuisance air contaminants or odorous compounds. Through adherence with mandatory compliance with SDAPCD Rules and State measures, project construction activities and materials would not create objectionable or nuisance odors at nearby air quality sensitive receptors. Impacts with respect to odors during construction of the future development would be less than significant.

Operation

Potential sources that may emit odors during operation of the future development include consumer products and architectural coatings. As mentioned above, the project is subject to SDAPCD Rules 51 and 67.0 to limit the emissions of nuisance air contaminants and VOCs. Through compliance with mandatory SDAPCD Rules, operations would not create objectionable odors and impacts would be less than significant.

Site Demolition and Preparation

The proposed project includes the demolition of the existing unoccupied buildings and related facilities on-site, disposal of the demolition debris, mass grading of the site, and existing utilities stubbed out to the project site boundary. As

previously detailed, construction equipment typically is not a source of odors. Odors from the combustion of diesel fuel would be minimized by complying with the CARB ATCM that limits diesel-fueled commercial vehicle idling to 5 minutes at any given location. The project would also comply with SDAPCD Rule 51 (Nuisance), which prohibits the emissions of nuisance air contaminants or odorous compounds. Through adherence with mandatory compliance with SDAPCD Rules and State measures, site demolition and preparation activities and materials would not create objectionable or nuisance odors at nearby air quality sensitive receptors. Impacts with respect to odors during site demolition and preparation would be less than significant.

2.1.4 Cumulative Impact Analysis

Cumulative impacts with respect to air quality assess the project's contribution to the cumulative increase in pollutants for which the San Diego Air Basin is listed as non-attainment for State and Federal AAQS. Specifically, these include PM10, PM2.5 and ozone precursors of NOx and VOCs.

A project that has a significant direct impact on air quality with regard to emissions of PM10, PM2.5, NOx and/or VOCs, would also have a significant cumulatively considerable net increase. In the event direct impacts from a proposed project are less than significant, a project may still have a cumulatively considerable impact on air quality, if the emissions of concern from the proposed project, in combination with the emissions of concern from other proposed projects or reasonably foreseeable future projects within the vicinity of the proposed project*,* have the potential to contribute to a significant cumulative impact (County of San Diego 2007). When combined with reasonably foreseeable cumulative projects within the vicinity of the project site*,* the project has the potential to contribute to a significant cumulative impact. As indicated in Issue 2 (see section 2.1.2 above), construction and operational emissions for the proposed project would have a less than significant impact to air quality. Additionally, with the implementation of **Mitigation Measure AIR-1**, criteria pollutant emissions associated with the operation of off road emissions would be further reduced below regional thresholds. Therefore, the project would not substantially contribute to a cumulatively considerable impact. The project would have a less than cumulative considerable impacts to air quality.

2.1.5 Significance of Impacts Prior to Mitigation

The following significant impact related to air quality would occur with project implementation:

> **Impact AIR-1**: Health risk for residential receptors would exceed the SCAQMD significance threshold of 10-in-one million for residential

receptors associated with both future building construction and site demolition and preparation for the proposed project.

2.1.6 Mitigation

AIR-1: Construction Equipment: The project shall require all off-road diesel equipment greater than 50 horsepower (hp) used during construction activities to meet USEPA Tier 4 final off-road emission standards or equivalent. Such equipment shall be outfitted with Best Available Control Technology (BACT) devices including a CARB-certified Level 3 Diesel Particulate Filter or equivalent.

2.1.7 Conclusion

The incorporation of **Mitigation Measure AIR-1** would reduce potential cancer and non-cancer risk to offsite sensitive receptors through minimization of DPM emissions from onsite construction equipment. **Table 2.1-9** summarizes the carcinogenic risk and non-carcinogenic risk for the maximum impacted sensitive receptors after implementation of mitigation. As shown in Table 2.1-9, the maximum incremental increase in cancer risk would be up to approximately 3-in-one million for construction risk for residential receptors and 0.1-in-one million for school receptors. With mitigation, risk for residential receptors would not exceed the SCAQMD significance threshold of 10-in-one million for residential or school receptors. The chronic health risk from construction of the project is 0.007 for residential and 0.001 for school receptors, well below the significance threshold of 1. The maximum exposed residential receptor remains located in the residential development directly west of the project site. The maximum exposed school receptor is located on the Mount Everest Academy campus located west of the project site across Mount Everest Boulevard. With the incorporation of Mitigation Measure AIR-1, impacts from air quality would be reduced to less than significant levels.

Table 2.1-9
Maximum Mitigated Incremental Increase in Risk for Off-Site Sensitive Receptors

	Maximum Cancer Risk (#-in-one million)[a]		Chronic Risk Hazard Index (HI)[b]	
Sensitive Receptor	**Residential**	**School**	**Residential**	**School**
Community Plan Amendment and Rezone				
Foundations/Concrete Pour	0.03	0.001	0.0003	0.0001
Building Construction	2.88	0.09	0.006	0.0011
Architectural Coating	0.06	0.002	0.0001	<0.0001
Paving	0.05	0.001	0.001	0.0002
Max CPAR[c]	2.94	0.10	0.007	0.001
Site Demolition and Preparation				
Demolition	0.05	0.001	0.001	0.0002
Site Preparation	0.11	0.003	0.002	0.0003
Grading	0.07	0.001	0.001	0.0002
Trenching	0.05	0.002	0.001	0.0001
Max D&P[c]	0.27	0.01	0.005	0.001
Cumulative Risk[d]	3.06	0.10	0.007	0.001
Significance Threshold	10	10	1.0	1.0
Exceeds Threshold?	No	No	No	No

NOTES:

a. Cancer risk values based on actual exposure over the duration of construction activities. The construction risk was calculated assuming a child was born at the beginning of the project construction, and would be exposed during the duration of construction activities. The third trimester exposure was excluded as construction is anticipated to take less than two years and exposure from birth to two years results in greater cancer risk, therefore excluding the third trimester exposure results in a more conservative risk analysis.

b. Chronic risk HI values based on the annual maximum levels of DPM divided by the corresponding DPM reference exposure levels (RELs).

c. Note, totals may not add due to rounding and the fact that for each construction phase the maximum impacted receptor may be different. CPAR = Community Plan Amendment and Rezone; D&P = Site Demolition and Preparation

d. Cumulative risk is the total risk from the Community Plan Amendment and Rezone and the Site Demolition and Preparation. Totals from Max CPAR and Max D&P may not add due to rounding and the fact that each individual construction phase may have a different maximum impacted receptor.

SOURCE: ESA 2019. (See Appendix D)

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2.2 Hazards and Hazardous Materials

This section provides an assessment of potential impacts related to hazards and hazardous materials that could result from project implementation. Potential impacts addressed in this section include exposure of people or structures to wildland fires, hazardous materials, and interference with emergency response plans.

Comments related to hazards and hazardous materials received during the public comment period for the Notice of Preparation (NOP) include concerns regarding the existing power and gas lines located near the project site. The NOP and all comment letter received in response to the NOP are included in Appendix A of this EIR.

2.2.1 Existing Conditions

2.2.1.1 Historic Property Uses

According to the Phase I Environmental Site Assessment (ESA) (Appendix G) that was prepared for the proposed project, historical aerial photographs of the project site date back to 1903 (Ninyo & Moore 2019). The project site was vacant and undeveloped from as early as 1903 until 1964, when a portion of the present-day single-story building on the western portion of the site was constructed. From 1964, various roads and structures were constructed in the project area, including Mount Etna Drive, Genesee Avenue, and the SDG&E natural gas pipeline followed by two commercial structures south of the project site and single family residences to the west. By 1966, three gasoline service stations operated at the northwest, northeast, and southeast corners of the Mount Etna Drive and Genesee Avenue intersection. In the 1970s, there was additional commercial development along Genesee Avenue, and in 1975 an addition was added to the southeastern portion of the single-story building at the project site. In the 1980s, the adjacent properties to the north and northwest of the site were developed with commercial uses and office buildings. In 1994, the attached garage is present at the southwestern portion of the project site, and in 1996, the two-story warehouse portion of the site is visible in aerial photographs. The project site has maintained its current configuration since 1996.

2.2.1.2 Hazardous Materials Evaluation

The Phase I ESA prepared for the project site included a review of information and documents pertaining to the site, an evaluation of federal, state, and local databases, a site reconnaissance of the subject property and surrounding areas, interviews, a review of prior reports, aerial photographs, and topographic, geologic, and hydrogeologic maps. The Phase I ESA found no evidence of any

existing recognized environmental conditions in connection with the project site. The results of the Phase I ESA are summarized below.

Database Evaluation of the Project Site

An environmental database record search was completed for the project site and surrounding area as to identify information pertaining to documented and/or suspected releases of regulated hazardous substances and/or petroleum products within specified search distances (up to one mile). The records search determined that the project site was listed in several environmental databases searched, as detailed in **Table 2.2-1**.

Table 2.2-1
Environmental Database Listing for the Project Site

Former Occupants	Database	Summary
San Diego County Regional Crime Lab	ECHO FINDS LOP LUST RCRA-SQG SAM SWEEPS UST UST	The project site was occupied by the Crime Lab from 1980 to 2018. The facility has a closed unauthorized release case (H14261-001) associated with a diesel fuel release that impacted soil only. The case was opened in September 1991 and closed in May 1995. The facility is also listed as a small quantity generator of waste and is listed as having an active 1,000-gallon motor fuel underground storage tank (UST).
Clairemont Hospital	Hist Cortese	Prior to the County's acquisition of the property, the site was occupied by Clairemont Hospital. This occupant is listed in the database; however, no other information is provided.

Source: Ninyo & Moore 2019

According to the Phase I ESA, County of San Diego Department of Environmental Health (DEH) documentation shows that a 1,000-gallon diesel UST and associated contaminated soil was removed from the project site in 1991. A 500-gallon UST was removed in 1992 and replaced with a 4,000-gallon diesel UST. This 4,000-gallon UST currently remains on the project site. During UST testing, no failed tests were found or other evidence of release.

Records for the project site include DEH compliance inspection reports from 1996 to 2019. According to the December 2018 compliance inspection report, the San Diego County Regional Crime Lab (Crime Lab) moved to a new facility in August 2018 and the facility's hazardous and medical wastes were disposed of in August and November 2018.

Database Evaluation of Off-Site Properties

Off-site properties appeared on various regulatory agency databases. Off-site properties were evaluated as to their potential to impact soil and/or groundwater at the project site. The following five properties were interpreted to represent a potential environmental concern to the project site, based on their proximity to the project site, the nature of the database on which they were listed, and/or the southwest direction of groundwater flow in the site vicinity.

1. Rite Aid #5653 is located at 5270 Balboa Avenue, approximately 146 feet southeast from the project site. The property is a conditionally exempt small quantity generator that generates pharmaceutical and photo-processing type wastes. Inspection reports did not indicate evidence of a spill or release at the property. Based on the type of business (retail) and the absence of spills or releases, this property is not a concern to the project site at this time.
2. Mobil T0220/Former Mobil Station is located at 4302 Genesee Avenue, approximately 168 feet northeast of the project site. The property was a former gasoline station which has a closed unauthorized release case, which was closed in October 1986. Four underground storage tanks (USTs) were removed in August 1986. Based on the case close status, the medium affected (soil), and that the primary sources of the release were removed (USTs), this property does not represent an environmental concern to the project site at this time.
3. Genesee Shell/Shell Oil Service Station/Cagles Genesee Shell is located at 4303 Genesee Avenue, approximately 327 feet northeast of the project site. The former gasoline service station is listed under multiple databases regarding a UST release that impacted soil and groundwater. USTs were removed, along with impacted soil and water. Multiple groundwater monitoring wells were installed to monitor groundwater and soil vapor. The case was closed in August 2018 with residual soil and groundwater contamination left in place under a Low Threat UST Case Closure Policy.
4. Circle K Store is located at 4360 Genesee Avenue, approximately 449 feet north of the project site. The property includes an active gasoline station with a closed unauthorized release case. Groundwater monitoring wells and remedial wells were installed on the property. Based on the case closure and distance from the project site, this property does not represent a concern to the project site at this time.
5. Chevron/Balboa Avenue is located at 5401 Balboa Avenue, approximately 489 feet southeast of the project site. The property contains a former gasoline service station with four closed unauthorized release cases that impacted soil and groundwater. Based on the case closed status, remediation performed, and the distance to the project site, this property does not represent a concern to the project site at this time.

According to the project-specific Phase I ESA, the properties listed above were not considered to be environmental concerns to the project site because of the distance and orientation between the off-site properties and the project site, direction of groundwater flow, and the case status (Ninyo & Moore 2019).

Site Reconnaissance

A physical inspection of the project site was conducted on March 20, 2019. The following on-site observations were made:

- Petroleum products observed include hydraulic fluid in the elevator equipment reservoir and diesel fuel associated with the backup generator. Hazardous substances include cooling tower chemicals and refrigerants used for the cooling system.
- Access covers associated with a 4,000-gallon UST were observed adjacent to the emergency generator.
- A pad-mounted transformer was observed on the south-central portion of the project site. No evidence of leaks was observed.
- A sump and pump were observed in a landscaped area near the main entrance to the building.
- The warehouse portion of the project site contains a hydraulic freight elevator. No leaks or staining were observed adjacent to the hydraulic reservoir.
- Three 55-gallon poly drums were observed adjacent to the cooling towers.

2.2.1.3 Airports

The nearest public airport is Montgomery Field Airport, located approximately 2 miles east of the project site. The nearest private airstrip is the Marine Corps Air Station (MCAS) Miramar, located approximately 2.9 miles northeast of the project site. According to the Montgomery Field Airport Land Use Compatibility Plan (ALUCP) and the MCAS Miramar ALUCP, the project site is not within any safety zones for either airport (ALUC 2010; ALUC 2008). However, the project site is located within Montgomery Field and MCAS Miramar's Airport Influence Area denoted as Review Area 2 (ALUC 2010; 2008). According to both airport's ALUCPs, Review Area 2 encompasses the portions of the airspace protection and overflight notification areas not included in Review Area 1. For both airports, Review Area 2 would not require any ALUC review, nor is it subject to any noise or safety zone standards. However, any new construction would need a "determination of no hazard to air navigation" from the FAA prior to issuance of a building permit by the City of San Diego.

2.2.1.4 Wildfires

Both the State of California and County of San Diego map the Fire Hazard Severity Zones within San Diego County. According to the California Department of Forestry and Fire Protection (CALFIRE), the Fire Hazard Severity Zones are based on an evaluation of fire history, existing and potential fuel, flame length, blowing embers, terrain, weather, and the likelihood of buildings igniting. The project site is not within a Local Responsibility Area Fire Hazard Severity Zone, also referred to as “very high fire hazard severity zone” (CALFIRE 2009).

2.2.1.5 Electric Magnetic Fields

The project site is adjacent to a 50-foot wide SDG&E easement with two sets of overhead transmission lines. Extremely low frequency (ELF) electric and magnetic fields (EMF) include alternating current (AC) fields and other electromagnetic, nonionizing radiation from 1 Hz to 300 Hz. Power lines, like electrical wiring and electrical equipment, produce ELF fields at 60 Hz (OSHA 2016). This EIR does not consider EMF in the context of the CEQA analysis of potential environmental impacts because: [1] there is no agreement among scientists that EMF creates a potential health risk, and [2] there are no defined or adopted CEQA standards for defining health risk from EMF.

2.2.2 Regulatory Setting

2.2.2.1 Federal

Resource Conservation and Recovery Act

The Resource Conservation and Recovery Act (RCRA) establishes a framework for national programs to achieve environmentally sound management of both hazardous and non-hazardous wastes. RCRA was designed to protect human health and the environment, reduce/eliminate the generation of hazardous waste, and conserve energy and natural resources. RCRA also promotes resource recovery techniques. The Hazardous and Solid Waste Amendments of 1984 both expanded the scope of RCRA and increased the level of detail in many of its provisions. The Hazardous Waste Management subchapter of the RCRA deals with a variety of issues regarding the management of hazardous materials including the export of hazardous waste, State programs, inspections of hazardous waste disposal facilities, enforcement, and the identification and listing of hazardous waste.

Comprehensive Environmental Response, Compensation, and Liability Act

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) of 1980 was enacted to protect water, air, and land resources from the risks created by past chemical disposal practices such as abandoned and

historical hazardous waste sites. Through the act, the U.S. Environmental Protection Agency (EPA) was given power to seek out the parties responsible for any release and assure their cooperation in the cleanup. CERCLA created a tax on the chemical and petroleum industries that went to a trust fund for cleaning up abandoned or uncontrolled hazardous waste sites, commonly known as the Superfund. CERCLA also authorized the revision of the National Contingency Plan, which provided the guidelines and procedures needed to respond to releases and threatened releases of hazardous substances, pollutants, or contaminants. The National Contingency Plan also established the National Priority List of sites, which are known as Superfund sites.

Superfund Amendments and Reauthorization Act

The Superfund Amendments and Reauthorization Act (SARA) is intended primarily to address the emergency management of accidental releases, and to establish State and local emergency planning committees responsible for collecting hazardous material inventory, handling and transportation data. Specifically, under Title III of SARA, a nationwide emergency planning and response program established reporting requirements for businesses that store, handle or produce significant quantities of hazardous or acutely toxic substances as defined under federal laws. Title III of SARA also requires each state to implement a comprehensive system to inform federal authorities, local agencies and the public when significant quantities of hazardous or acutely toxic substances are stored or handled at a facility. These data are made available to the community at large under the “right-to-know” provision, with SARA also requiring annual reporting of continuous emissions and accidental releases of specified compounds.

Toxic Substances Control Act

The Toxic Substances Control Act of 1976 was enacted by Congress to give the U.S. EPA the ability to track over 75,000 industrial chemicals currently produced or imported into the United States. The U.S. EPA repeatedly screens these chemicals and can require reporting or testing of any that may pose an environmental or human health hazard. It can ban the manufacture and import of those chemicals that pose an unreasonable risk. The U.S. EPA also has mechanisms in place to track the thousands of new chemicals that industry develops each year with either unknown or dangerous characteristics and it control these chemicals as necessary to protect human health and the environment. The act supplements other federal statutes, including the CAA and the Toxics Release Inventory under Emergency Planning and Community Right-to-Know Act.

U.S. Department of Transportation Hazardous Materials Transport Act (49 USC 5101)

The United States Department of Transportation (USDOT), in conjunction with the United States Environmental Protection Agency (USEPA), is responsible for enforcement and implementation of federal laws and regulations pertaining to transportation of hazardous materials. The Hazardous Materials Transportation Act of 1974 directs the USDOT to establish criteria and regulations regarding the safe storage and transportation of hazardous materials. Code of Federal Regulations (CFR) 49, 171–180, regulates the transportation of hazardous materials, types of material defined as hazardous, and the marking of vehicles transporting hazardous materials.

2.2.2.2 State

California Division of Occupational Safety and Health

The California Division of Occupational Safety and Health (Cal/OSHA) is responsible for developing and enforcing workplace safety standards and assuring worker safety in the handling and use of hazardous materials. Among other requirements, Cal/OSHA requires many entities to prepare injury and illness prevention plans and chemical hygiene plans and provides specific regulations to limit exposure of construction workers to lead. Under Cal/OSHA, contractors are required to comply with handling and use requirements to increase worker safety and reduce the possibility of spills, and to prepare an emergency response plan to respond to accidental spills.

Government Code Section 65962.5, Cortese List

The provisions in Government Code Section 65962.5 are commonly referred to as the “Cortese List” (after the Legislator who authored and enacted the legislation). The list, or a project site’s presence on the list, has bearing on the local permitting process, as well as on compliance with CEQA. The comprehensive “Cortese List” includes the following facilities or sites:

- Hazardous waste and substances sites from Department of Toxic Substances Control’s (DTSC’s) EnviroStor database.
- Leaking UST (LUST) sites from State Water Resources Control Board’s (SWRCB’s) GeoTracker database.
- Solid-waste disposal sites identified by SWRCB with waste constituents above hazardous waste levels outside the waste management unit.
- “Active” Cease and Desist Orders and Cleanup and Abatement Orders sites from the SWRCB.
- Hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the Health and Safety Code, identified by DTSC.

California Fire Code

The California Fire Code, Article 80, includes specific requirements for the safe storage and handling of hazardous materials. These requirements reduce the potential for a release of hazardous materials and for mixing of incompatible chemicals, and specify the following design features to reduce the potential for a release of hazardous materials that could affect public health or the environment:

- Separation of incompatible materials with a noncombustible partition.
- Spill control in all storage, handling, and dispensing areas.
- Separate secondary containment for each chemical storage system.

The California Fire Code, Article 79, includes specific requirements for the safe storage and handling of flammable and combustible liquids. Specific requirements address fire protection; prevention and assessment of unauthorized discharges; labeling and signage; protection from sources of ignition; specifications for piping, valving, and fittings; maintenance of above-ground tanks; requirements for storage vessels, vaults, and overfill protection; and requirements for dispensing, using, mixing, and handling of flammable and combustible liquids.

Title 22 of the California Code of Regulations & Hazardous Waste Control Law, Chapter 6.5

Department of Toxic Substances Control (DTSC) is responsible for implementing the RCRA program as well as California's own hazardous waste laws, which are collectively known as the Hazardous Waste Control Law. Under the Certified Unified Program Agency (CUPA) program, California Environmental Protection Agency (CalEPA) has in turn delegated enforcement authority of State law to the County for regulating hazardous waste producers or generators. The DTSC regulates the generation, transportation, treatment, storage and disposal of hazardous waste under RCRA and the California Hazardous Waste Control Law. Like RCRA, Title 22 imposes "cradle to grave" regulatory systems for handling hazardous waste in a manner that protects human health and the environment. CalEPA has delegated some of its authority under the Hazardous Waste Control Law to county health departments and other CUPAs, including the DEH.

California Health and Safety Code

The CalEPA/DTSC has established rules governing the use of hazardous materials and the management of hazardous wastes. California Health and Safety Code Section 25531, et seq., incorporate the requirements of SARA and the federal CAA as they pertain to hazardous materials. Under the California Accidental Release Prevention Program (CalARP), California Health and Safety

Code Section 25531 to 25545.3), certain businesses that store or handle more than 500 pounds, 55 gallons or 200 cubic feet (for gases) of acutely hazardous materials at their facilities are required to develop and submit a Risk Management Plan (RMP) to the appropriate local authorities, the designated local administering agency and the USEPA for review and approval. The RMP is intended to satisfy federal "right-to-know" requirements and provide basic information to regulators and first responders, including identification/ quantification of regulated substances used or stored on site, operational and safety mechanisms in place (including employee training), potential on- and off-site consequences of a release and emergency response provisions.

Pursuant to California Health and Safety Code Chapter 6.11, CalEPA established the Unified Hazardous Waste and Hazardous Materials Management Regulatory Program (Unified Program), which consolidated a number of existing State programs related to hazards and hazardous materials. The Unified Program also allows the designation of Certified Unified Program Agencies (CUPAs) to implement associated State regulations within their jurisdiction. For businesses within the County, Hazardous Materials Business Plans (HMBPs) are submitted to and approved by the County of San Diego Hazardous Materials Division, which is the local CUPA as outlined below under County requirements.

California Human Health Screening Levels

The California Human Health Screening Levels (CHHSLs) are concentration thresholds established by CalEPA for 54 hazardous chemicals in soil or soil gas of concern for risks to human health. The CHHSLs were developed using standard exposure assumptions and chemical toxicity values published by the USEPA and CalEPA. The CHHSLs can be used to screen sites for potential human health concerns where releases of hazardous chemicals to soils have occurred. Under most circumstances, the presence of a chemical in soil, soil gas, or indoor air at concentrations below the corresponding CHHSL can be assumed to not pose a significant health risk to people who may live or work at the site.

2.2.2.3 Local

San Diego County Office of Emergency Services

The San Diego County Office of Emergency Services is the designated lead agency for emergency response within the County and coordinates the implementation of the San Diego County Emergency Operations Plan. The County of San Diego has instituted a regional notification system that will be able to send telephone notifications to residents and businesses within San Diego County impacted by, or in danger of being impacted by, an emergency or disaster. This system, called AlertSanDiego, will be used by emergency response personnel to notify those homes and businesses at risk with

information on the event and/or actions to take, such as evacuation (AlertSanDiego 2016).

Multi-Jurisdictional Hazard Mitigation Plan

The Multi-Jurisdictional Hazard Mitigation Plan (MJHMP) is a countywide plan that identifies risks and ways to minimize damage by natural and manmade disasters. The MJHMP is a comprehensive resource document that serves many purposes, including enhancing public awareness, creating a decision tool for management, promoting compliance with state and federal program requirements, enhancing local policies for hazard mitigation capability, and providing inter-jurisdictional coordination. The MJHMP identifies goals and objectives for each of the 21 participating jurisdictions, including the City of San Diego. The following City of San Diego goals and objectives from the MJHMP are relevant to the proposed project.

> **Goal 1:** Promote public understanding, support, and demand for hazard mitigation.
>
> **Goal 2:** Improve hazard mitigation coordination and communication with federal, state, local, and tribal governments.
>
> **Objective 2.B:** Encourage other organizations to incorporate hazard mitigation activities.

City of San Diego General Plan

The City of San Diego General Plan Public Facilities, Services and Safety Element addresses facilities and services that are publicly managed and have a direct influence on the location of land uses, including fire-rescue, waste management, and disaster preparedness. The following policies from the Public Facilities, Services and Safety Element are relevant to the proposed project.

> **Policy PF-P.4:** Coordinate the development and implementation of a City business continuity plan to ensure the continuity of operations and government in the event of a major disaster or emergency.
>
> **Policy PF-P.6:** Coordinate citywide emergency management and disaster planning and response through the integration of key City departments into the preparedness and decision-making process.

2.2.3 Analysis of Project Effects and Determination as to Significance

For purposes of this EIR, the identified significance thresholds are based on criteria provided in the City of San Diego's California Environmental Quality Act (CEQA) Significance Determination Thresholds (City of San Diego 2016).

Accordingly, a significant utilities and service systems impact would occur if the project would:

> Issue 1: 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; or
>
> Issue 2: Result in hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within a quarter-mile of an existing or proposed school; or
>
> Issue 3: Impair implementation of, or physically interfere with an adopted emergency response plan or emergency evacuation plan; or
>
> Issue 4: 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; or
>
> Issue 5: Expose people to toxic substances, such as pesticides and herbicides, some of which have long-lasting ability, applied to the soil during previous agricultural uses; or
>
> Issue 6: Result in a safety hazard for people residing or working in a designated airport influence area; or
>
> Issue 7: Result in a safety hazard for people residing or working within two miles of a private airstrip or a private airport or heliport facility that is not covered by an adopted Airport Land Use Compatibility Plan.

2.2.3.1 Wildland Fires

Issue 1: Would the project expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including when wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Impact Analysis

Community Plan Amendment and Rezone

The project includes an amendment to the CMCP and a rezone of the project site that would allow for a residential development with a maximum of 404 units. According to CALFIRE, the project site is not within a very high fire hazard severity zone (CALFIRE 2009). The project site itself is developed with the vacant Crime Lab facility and is immediately surrounded by existing development. The future development would be required to be developed consistent with the California Fire Code, as adopted by the City, and would be

constructed with a protective system of sprinklers and fire hydrant services. As detailed in Chapter 1.0, Project Description, the future development would include three potential access options. All driveways would be constructed per the City Fire Marshal's Standards and would provide adequate access throughout the project site for emergency responders. As the future development would be required to demonstrate consistency with all applicable California Fire Code regulations and would be reviewed by the City Fire Code Official prior to permit issuance, impacts regarding risk of loss, injury, or death involving wildland fires would be less than significant.

Site Demolition and Preparation

In addition to the amendments to the CMCP and rezone, the proposed project also includes the demolition of the existing unoccupied buildings and related facilities on-site, disposal of the demolition debris, mass grading of the site, and existing utilities stubbed out to the project site boundary. As previously stated, the project site is not within a very high fire hazard severity zone (CALFIRE 2009). Demolition and site preparation activities would be required to adhere to all state and local construction standards, including Cal/OSHA and the California Fire Code. Therefore, impacts related to risk of loss, injury, or death involving wildland fires would be less than significant.

2.2.3.2 Hazards Near Schools

Issue 2: Would the project result in hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within a quarter-mile of an existing or proposed school?

Impact Analysis

Community Plan Amendment and Rezone

The closest school to the project site is Mount Everest Academy, an independent study K through 12 school located approximately 0.1 mile to the west of the project site. The project includes amendments to the CMCP and a rezone of the project site that would allow for a future residential development. Construction of the future residential development would likely involve the transport, storage, use, and disposal of small amounts of hazardous materials, including fuels (e.g., gasoline, diesel), hydraulic fluids, oils, lubricants, paint, and other similarly related materials in varying quantities on the project site. Operation of the future development would include the storage, use, and disposal of a variety of commonly used hazardous chemicals, such as toners, lubricants, and kitchen and restroom cleaners as well as relatively small quantities of fuels, oils, and other petroleum-based products. While the project site is located within one-quarter mile of a school, the anticipated use, transport, and disposal of

hazardous materials during construction and operation would be in relatively small quantities commonly associated with typical home, landscaping, and commercial uses. The use of these hazardous materials would typically be sporadic in frequency and localized, with limited exposure such that there would be no substantive emissions of hazardous materials that would adversely affect students or staff. In addition, the proposed project would be required to comply with all applicable federal, state, and local regulations and guidelines for storing and handling hazardous materials. Therefore, impacts related to exposure of schools to hazardous materials would be less than significant. The potential for hazardous emissions exposure during construction of the future residential development is addressed in Section 2.1, Air Quality, of this EIR.

Site Demolition and Preparation

The proposed project includes the demolition of the existing unoccupied buildings and related facilities on-site, disposal of the demolition debris, mass grading of the site, and existing utilities stubbed out to the project site boundary. As detailed in Chapter 1.0, Project Description, the proposed site demolition and preparation would include the removal of the existing 4,000-gallon UST. Any required soil remediation would be completed following demolition activities, in compliance with applicable federal, state, and local regulations. A portion of the existing single-story building on the western portion of the site was constructed in 1964. Asbestos and lead materials were phased out in the mid to late 1970s, and therefore, due to the age of the existing building, asbestos and lead materials could be present in the structure. As detailed in Chapter 1.0, Project Description, demolition of the existing structure would require administrative approvals, including but not limited to a Debris Management Plan, Haul Route Plan, Asbestos Abatement Plan, and Lead Hazards Notification. Due to removal of the UST and potential to encounter contaminated media, including asbestos and lead materials, the proposed project would result in a potentially significant impact related to handling hazardous materials within a quarter-mile of a school (**Impact HAZ-1**). In accordance with the Phase I ESA (Appendix G), **Mitigation Measure HAZ-1,** detailed below, would be required, ensuring that handled hazardous materials during construction would not adversely affect nearby students or staff. The potential for hazardous emissions exposure during site demolition and preparation is addressed in Section 2.1, Air Quality, of this EIR.

2.2.3.3 Emergency Plans

Issue 3: Would the project impair implementation of, or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Impact Analysis

Community Plan Amendment and Rezone

The project site is located in a developed area with existing access to major roads that provide routes for emergency evacuation. Primary evacuation routes consist of the major interstates, highways, and prime arterials within the City. The project site is served by the San Diego Police Department (SDPD) and San Diego Fire-Rescue Department (SDFD). As further detailed within Section 3.6, Public Services, of this EIR, SDPD and SDFD would continue to serve the project site under the proposed project. The future development would be required to meet all requirements for access and ingress/egress of emergency vehicles, in accordance with the California Fire Code and City Municipal Code requirements. However, construction of the future development could include driveway reconfiguration, which could require lane closures and interfere with emergency response services and evacuation routes. Therefore, due to the potential for lane closures, the proposed project would result in a potentially significant impact related to interfering, even temporarily, with emergency access (**Impact HAZ-2**), and **Mitigation Measure HAZ-2**, detailed below, would be required.

Site Demolition and Preparation

The proposed project would include demolition of existing buildings and site preparation. These activities would not require lane closures, and is not anticipated to interfere, even temporarily, with emergency access. As previously stated, SDPD and SDFD would continue to serve the project site during site demolition and preparation. Therefore, the proposed project would not impair implementation of, or physically interfere with, the City's emergency evacuation plan, and impacts would be less than significant.

2.2.3.4 Hazardous Sites

Issue 4: Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section

65962.5 and, as a result, create a significant hazard to the public or environment?

Impact Analysis

Community Plan Amendment and Rezone

A project-specific Phase I ESA was prepared for the project site (Appendix G). As discussed above in Section 2.2.1.2, the project site was identified on several environmental databases searched due to previous uses on the project site. The project site was first occupied by the Clairemont Hospital, which was listed in the databases searched, but no other information on hazardous materials was provided. From 1980 to 2018, the project site was occupied by the Crime Lab facility. According to the database search, the facility has a closed unauthorized release case associated with a diesel fuel release that impacted soil only. The case was opened in September 1991 and closed in May 1995. In addition, DEH documentation shows that a 1,000-gallon diesel UST and associated contaminated soil was removed from the project site in 1991. A 500-gallon UST was removed in 1992 and replaced with a 4,000-gallon diesel UST. This 4,000-gallon UST currently remains on the project site. During UST testing, no failed tests were found or other evidence of release. The Phase I ESA found no evidence of any existing recognized environmental conditions in connection with the project site.

Off-site properties were also evaluated in the Phase I ESA, which appeared on various regulatory agency databases. Neighboring properties were not considered to be environmental concerns to the project site due to the distance and orientation between the off-site properties and the project site, direction of groundwater flow, and the case status. Future development of the project site would require compliance with all applicable federal, state, and local standards related to hazardous materials sites. Therefore, future development of the project site would result in a less than significant impact related to being located on a site which is included on a list of hazardous materials sites.

Site Demolition and Preparation

As previously detailed, the project site was identified on several environmental databases searched due to previous uses on the project site, including the Clairemont Hospital and Crime Lab facility. As detailed in Chapter 1.0, Project Description, the proposed site demolition and preparation would include the removal of the existing 4,000-gallon UST. Any required soil remediation would be completed following demolition activities, in compliance with applicable federal, state, and local regulations. However, since the project site is listed on several database searches and includes areas of known previous contamination, grading and other soil disturbance activities could encounter contaminated media or other

unknown contamination or hazards. Therefore, due to removal of the UST and potential to encounter contaminated media, the proposed project would result in a potentially significant impact related to being located on a site which is included on a list of hazardous materials site compiled pursuant to Government Code Section 65962.5 (**Impact HAZ-3**). In accordance with the Phase I ESA (Appendix G), **Mitigation Measure HAZ-1,** detailed below, ould be required.

2.2.3.5 Pesticides and Herbicides

Issue 5: Would the project expose people to toxic substances, such as pesticides and herbicides, some of which have long-lasting ability, applied to the soil during previous agricultural uses?

Impact Analysis

Community Plan Amendment and Rezone and Site Demolition and Preparation

As detailed above in Section 2.2.1.1, according to the project-specific Phase I ESA, historical aerial photographs of the project site date back to 1903. From 1903 until 1964, the project site was vacant and undeveloped until a portion of the present-day single-story building on the western portion of the site was constructed. In 1975 an addition was added to the southeastern portion of the single-story building at the project site, and in the mid-1990s the project site was constructed in its current configuration with an attached garage and two-story warehouse. No history of agricultural use is documented on the project site. Therefore, the proposed project would not expose people to toxic substances, such as pesticides and herbicides applied to the soil during previous agricultural uses, and no impact would occur.

2.2.3.6 Airport Influence Area

Issue 6: Would the project result in a safety hazard for people residing or working in a designated airport influence area?

Issue 7: Would the project result in a safety hazard for people residing or working within two miles of a private airstrip or a private airport or heliport facility that is not covered by an adopted Airport Land Use Compatibility Plan?

Impact Analysis

Community Plan Amendment and Rezone and Site Demolition and Preparation

As detailed above in Section 2.2.1.3, the nearest public airport is Montgomery Field Airport, located approximately 2 miles east of the project site. The nearest private airstrip is the MCAS Miramar, located approximately 2.9 miles northeast of the project site. According to the Montgomery Field ALUCP and the MCAS

Miramar ALUCP, the project site is not within any safety zones for either airport (ALUC 2010; ALUC 2008). However, the project site is located within Montgomery Field and MCAS Miramar's Airport Influence Area denoted as Review Area 2 (ALUC 2010; ALUC 2008). For both airports, Review Area 2 would not require any ALUC review, nor is it subject to any noise or safety zone standards. However, the future development would be required to have a determination of no hazard to air navigation from the FAA prior to issuance of a building permit by the City of San Diego. Compliance with FAA regulations would be required, therefore, impacts regarding safety hazards for people residing or working in the vicinity of a public or private airport would be less than significant.

2.2.4 Cumulative Impact Analysis

The cumulative context for hazardous materials consists of the areas that could be affected by proposed project activities as well as areas affected by other cumulative projects whose activities could directly or indirectly affect the activities on the surrounding area.

Future cumulative development could require the use, transport, storage, and disposal of hazardous materials. However, hazardous materials releases tend to be largely limited in geographic extent to the project site and cumulative impacts would only occur at adjacent sites. In addition, all cumulative projects would be required to comply with all relevant and applicable federal, state, and local laws and regulations that pertain to the transport, storage, and disposal of hazardous materials and waste. Impacts to related school sites, listing on a hazardous materials site, surrounding airports, and wildland fires are site-specific and not cumulative in nature because impacts related to individual projects would be site specific and not additive. Potential risks identified for the proposed project or on cumulative project sites would not affect potential risks elsewhere in the project area. Therefore, the proposed project would not be cumulatively considerable, and impacts would be less than significant.

A cumulative impact related to emergency evacuation plans would occur if development on the project site and surrounding developments would not provide adequate access to regional evacuation routes. As discussed above, the proposed project would not interfere with the implementation of any regional response to evacuation plans. Demolition activities and construction of the future development would not require road closures, or affect any of the existing road networks surrounding the project site. Therefore, the proposed project would not be cumulatively considerable, and impacts would be less than significant.

2.2.5 Significance of Impacts Prior to Mitigation

The following significant impacts related to hazards and hazardous materials would occur with project implementation:

Impact HAZ-1: Due to removal of the UST and potential to encounter contaminated media, including asbestos and lead materials, the proposed project would handle hazardous materials within a quarter-mile of a school.

Impact HAZ-2: Due to the potential for lane closures during construction of the future development, the proposed project could temporarily interfere with emergency access.

Impact HAZ-3: The project site is listed on several database searches pursuant to Government Code Section 65962.5 and includes areas of known previous contamination. Grading and other soil disturbance activities could encounter contaminated media or other unknown contamination or hazards.

2.2.6 Mitigation

HAZ-1: Soil Contamination, Lead, and Asbestos Recommendations. During demolition of the existing buildings, site preparation for the future development, and construction of the future development, the construction contractor shall ~~follow~~ implement the findings and recommendations of the Phase I ESA, including:

- ~~In future development of the project site, preparation and implementation of a~~ A soil management plan shall be prepared by a qualified specialist and implemented ~~used~~ during project construction activities near areas of known contamination~~. Where contamination is known or suspected, and~~ or where grading or other soil disturbance activities could encounter contaminated media, undocumented USTs, or other unknown contamination or hazards~~., implementation of a~~ The soil management plan ~~provides~~ shall contain protocols to address site-specific ~~hazardous~~ conditions~~, if encountered,~~ in ~~accordance~~ compliance with local, state, and federal regulations.

- Soil sampling shall be performed at the time of ~~the~~ UST removal to evaluate whether an unauthorized release has occurred. If contaminated soil is identified, protocols in the soil management plan shall be implemented in compliance with local, state, and federal regulations.

- A worker health and safety plan shall be prepared and implemented during construction near areas of known contamination.

- ~~A~~ The extent of asbestos-containing materials and lead-based paint shall be ~~evaluated~~ determined through appropriate testing techniques prior to ~~razing of the site~~ building demolition. Proper protocols for the removal of asbestos-containing materials and lead-based paint shall be followed in compliance with local, state, and federal regulations.

HAZ-2: Traffic Control Plan. Prior to the start of construction of the future development, the construction contractor shall prepare a Traffic Control Plan to the satisfaction of the City Engineer. The Traffic Control Plan shall show all signage, striping, delineated detours, flagging operations, and any other devices that will be used during construction to guide motorists, pedestrians, and bicyclists through the construction area and allow for adequate access and circulation to the satisfaction of the City Engineer. The Traffic Control Plan shall be prepared in accordance with the City's traffic control guidelines and shall be prepared to ensure that emergency access will be continuously provided.

2.2.7 Conclusion

The proposed project would not result in impacts related to risk of loss, injury, or death involving wildland fires. In addition, the project site has no history of previous agricultural uses, and no impact would occur related to exposing people to toxic substances such as pesticides and herbicides. Compliance with FAA regulations would be required, therefore, impacts regarding safety hazards for people residing or working in the vicinity of a public or private airport would be less than significant.

Due to removal of the existing UST and potential to encounter contaminated media, including asbestos and lead materials, the proposed project would result in a potentially significant impact related to handling hazardous materials within 0.25 miles of a school (**Impact HAZ-1**). In addition, since the project site is listed on several database searches and includes areas of known previous contamination, grading and other soil disturbance activities could encounter contaminated media or other unknown contamination or hazards. Therefore, due to removal of the UST and potential to encounter contaminated media, the proposed project would result in a potentially significant impact related to being located on a site which is included on a list of hazardous materials site compiled pursuant to Government Code Section 65962.5 (**Impact HAZ-3**). However, with implementation of **Mitigation Measure HAZ-1**, demolition of the existing building

and construction of the future development would implement recommendations of the Phase I ESA, and impacts would be reduced to less than significant.

Construction of the future development could include driveway reconfiguration, which could require lane closures and interfere with emergency response services and evacuation routes. Due to the potential for lane closures during construction of the future development, the proposed project could temporarily interfere with emergency access (**Impact HAZ-2**). However, with implementation of **Mitigation Measure HAZ-2**, a Traffic Control Plan would be required to be prepared and implemented.

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2.3 Noise and Vibration

This section characterizes the ambient noise environment and identifies potential noise and vibration impacts associated with implementation of the proposed project, particularly on any nearby sensitive receptors. The analyses in this section are based on existing conditions, applicable policies, as well as the noise modeling conducted for the project, which is included in Appendix H of this EIR.

Comments related to noise and vibration received during the public comment period for the Notice of Preparation (NOP) included concerns regarding increased ambient noise levels during construction and operation of the project and that the future residential building allowed by the project would generate noise that would interfere with rights for quiet enjoyment within the community of Clairemont Mesa. These concerns have been considered and addressed, as applicable, in the following evaluation of the project's potential to result in noise and vibration impacts. The NOP and all comment letters received in response to the NOP are included in Appendix A of this EIR.

2.3.1 Existing Conditions

Noise is generally defined as unwanted sound (i.e., loud, unexpected, or annoying sound). Sound is measured in decibels (dB), on a logarithmic scale ranging from 0 dB corresponding roughly to the threshold of human hearing to 120 to 140 dB corresponding to the threshold of pain. Further, the typical human ear is not equally sensitive to all frequencies of the audible sound spectrum, and as such dB levels are weighted to the human ear's decreased sensitivity to extremely low and extremely high frequencies, expressed as A-weighted decibels (dBA). Noise exposure is a measure of noise over a period of time; a noise level is a measure of noise at a given instant in time. The maximum, instantaneous noise level experienced during a given period of time is expressed as L_{max}. The equivalent sound level (L_{eq}) is used to describe noise over a specified period of time (typically 1-hour), which may also be referred to as the average sound level. The Community Noise Equivalent Level (CNEL) is the average A-weighted noise level during a 24-hour day adjusted with penalties for evening and nighttime noise. Noise attenuates with distance at a rate of – 6 dBA per doubling of distance for stationary point sources (typically including construction noise sources) and – 3 dBA per doubling of distance for mobile line sources (e.g., vehicle traffic on roadways).

The project site is located in the City of San Diego, within the Clairemont Mesa community. The project site is near the intersection of two major roads, Balboa Avenue and Genesee Avenue, and approximately 1.22 miles west of Interstate 805 (I-805), approximately 2.10 miles northeast of I-5, and approximately 1.78 miles south of Highway 52. The project site is currently unoccupied and contains the former San Diego County Regional Crime Lab (Crime Lab) building, with a

surface parking lot previously used for employee parking adjacent to the project site to the west. Areas surrounding the project site are mostly developed with residential, commercial and office uses. The project site is bounded by Mount Etna Drive and single-family residential to the north; commercial development and Genesee Avenue to the east; commercial development, Balboa Avenue, and multi-family residential to the south; and SDG&E surface parking with transmission towers with overhead power lines and single-family residences fronting Mount Castle Avenue, to the west.

The primary existing noise source in the project area is vehicle traffic noise from surrounding and nearby roadways. The nearest airport to the project site is Montgomery Field Airport, approximately 2 miles east of the project site, and Marine Corps Air Station (MCAS) Miramar, approximately 2.9 miles northeast of the project site. Secondary noise sources including activity at adjacent residences; general commercial activities including loading dock/delivery truck activities trash truck pickups, commercial and residential air-conditioning units; and landscape activities.

The existing residences to the west and south of the project site are considered noise-sensitive land uses (NSLU), which are land uses associated with indoor and/or outdoor activities that may be subject to stress and/or significant interference from noise, such as residential dwellings, mobile homes, hotels, motels, hospitals, nursing homes, educational facilities, and libraries. Mount Everest Academy is located approximately 550 feet west of the project site. Industrial and commercial land uses are generally not considered sensitive to noise.

To characterize the existing noise environment at noise sensitive receptors near the project site, one long-term (LT) and four short-term (ST) (15-minute) ambient noise level measurements were conducted at various locations surrounding the project site, as shown in **Figure 2.3-1**. A 15-minute measurement is a reasonable duration for sampling ambient noise levels where vehicle traffic is the dominant source, as traffic noise generally does not vary significantly within an hour. Ambient sound measurements were conducted on Monday and Tuesday, August 5 and 6, 2019 at the following locations:

- LT-1: At the western edge of the SDG&E easement west of the project site and approximately 10 feet east of the 6-foot-high privacy wall of the backyard of single-family residences, approximately 270 feet south of Mount Etna Drive, approximately 150 feet west of the project site.
- ST-1: At the single-family residence along Mount Etna Drive, approximately 100 feet east of the intersection with Mount Castle Avenue, approximately 150 feet northwest of the project site.

- ST-2: At single-family residences along Mount Castle Avenue, approximately 340 feet south of Mount Etna Drive, approximately 320 feet west of the project site.
- ST-3: On the northwestern edge of the commercial parking lot southwest of the project site and approximately 10 feet east of the 6-foot-high privacy wall of the backyard of single-family residences, approximately 500 feet south of Mount Etna Drive, approximately 175 feet southwest of the project site.
- ST-4: At the multi-family residences along the southern side of Balboa Avenue, approximately 500 feet west of its intersection with Genesee Avenue, approximately 450 feet south of the project site.

The results of the short-term and long-term ambient sound measurements are summarized in **Table 2.3-1** and **Table 2.3-2**, respectively. As shown in Table 2.3-1, the measured noise levels ranged from 53.2 dBA L_{eq} at ST2 to 65.7 dBA L_{eq} at ST4, in which the primary noise source was vehicle traffic along the roadways surrounding the project site (Balboa Avenue, Genesee Avenue, and Mount Etna Drive).

Table 2.3-1
Short-Term Measurement Summary

Measurement Locations	Date	Time	Measured Level (Leq (1), dBA)	Primary Noise Sources
ST1	8/6/2019	14:19-14:34	56.9	Vehicle traffic
ST2	8/6/2019	14:38-14:53	53.2	Vehicle traffic
ST3	8/6/2019	14:59-15:14	58.5	Vehicle traffic
ST4	8/6/2019	15:21-15:36	65.7	Vehicle traffic

SOURCE: ESA 2019 (Appendix H)

Table 2.3-2
Long-Term Measurement Summary

Measurement Locations	Start Date and Time	End Date and Time	Measured Level (Leq (24), dBA)
LT1	8/5/2019 14:42	8/6/2019 16:00	50.9

SOURCE: ESA 2019 (Appendix H)

Vibration can be interpreted as energy transmitted in waves through the ground or man-made structures. These energy waves generally dissipate with distance from the vibration source mostly due to geometric spreading. In contrast to noise, ground-borne vibration is not a common environmental problem. Some common sources of ground-borne vibration are trains, heavy trucks on rough roads, and construction activities, such as blasting, pile-driving, and operation of heavy earth-moving equipment.

There are several different methods that are used to quantify vibration. The peak particle velocity (PPV) is defined as the maximum instantaneous peak of the vibration signal. The PPV is most frequently used to describe vibration impacts to buildings; i.e., structural damage. The root mean square (RMS) amplitude is most frequently used to describe the effect of vibration on the human body; i.e., perception and annoyance. The RMS amplitude is defined as the average of the squared amplitude of the signal. Decibel notation (VdB) is commonly used to measure RMS vibrational motion. The relationship of PPV to RMS velocity is expressed in terms of the "crest factor," defined as the ratio of the PPV amplitude to the RMS amplitude. PPV is typically a factor of 1.7 to 6 times greater than RMS vibration velocity (Ibid). The decibel notation acts to compress the range of numbers required to describe vibration. Typically, ground-borne vibration generated by man-made activities attenuates rapidly with distance from the source of the vibration.

Sensitive receptors for vibration include structures (especially older masonry structures), people, and vibration sensitive equipment. The effects of ground-borne vibration include movement of the building floors, rattling of windows, shaking of items on shelves or hanging on walls, and rumbling sounds. In extreme cases, the vibration can cause structural damage to buildings, however, is not a factor for most projects, with the occasional exception of blasting and pile-driving during construction. Human annoyance from vibration often occurs when the vibration levels exceed the threshold of human perception by only a small margin, which would be well below the structural damage threshold for normal buildings.

2.3.2 Regulatory Setting

2.3.2.1 Federal

Federal Transit Administration

Although the FTA standards are intended for federally funded mass transit projects, the impact assessment procedures and criteria included in the FTA Transit Noise and Vibration Impact Assessment Manual (May 2018) are routinely used for projects proposed by local jurisdictions, including the County and City of San Diego. The potential for vibration damage can vary depending on the

building category of the nearest buildings to the potential construction area. For example, for a building that is constructed with reinforced concrete with no plaster, the FTA guidelines show that a vibration level of up to 0.5 inch per second (in/sec) peak particle velocity (PPV) is considered safe and would not result in any construction vibration damage. For a non-engineered timber and masonry building, the construction vibration damage criterion is 0.2 in/sec PPV.

2.3.2.2 State

California Noise Control Act

Sections 46000-46080 of the California Health and Safety Code find that excessive noise is a serious hazard to the public health and welfare and that exposure to certain levels of noise can result in physiological, psychological, and economic damage. It also finds that there is a continuous and increasing bombardment of noise in the urban, suburban, and rural areas. The California Noise Control Act declares that the State of California has a responsibility to protect the health and welfare of its citizens by the control, prevention, and abatement of noise. It is the policy of the State to provide an environment for all Californians free from noise that jeopardizes their health or welfare.

California Code of Regulations

Interior noise levels for habitable rooms are regulated by Title 24 of the California Code of Regulations (CCR), California Noise Insulation Standards. Title 24, Chapter 12, Section 1207.4, of the California Building Code (CBC) requires that interior noise levels attributable to exterior sources not exceed 45 CNEL in any habitable room within a residential structure. A habitable room is a room used for living, sleeping, eating, or cooking. Bathrooms, closets, hallways, utility spaces, and similar areas are not considered habitable rooms for this regulation (24 CCR 1207 2016).

For nonresidential structures, Title 24, Chapter 12, Section 1207.5 refers to 2016 California Green Building Standards (CALGreen), Chapter 5 – Nonresidential Mandatory Measures, Division 5.5 – Environmental Quality, Section 5.507 – Environmental Comfort, Subsection 5.507.4 – Acoustical Control. Pursuant to these standards, all nonresidential building construction shall employ building assemblies and components that achieve a composite sound transmission class rating of at least 50 or shall otherwise demonstrate that exterior noise shall not result in interior noise environment where noise levels exceed 50 A-weighted equivalent decibels (dB(A) L_{EQ}) in occupied areas during any hour of operation (24 CCR 1207.5 2016).

California Department of Health Services

The State of California does not have statewide standards for environmental noise, but the California Department of Health Services (DHS) has established guidelines for evaluating the compatibility of various land uses as a function of community noise exposure. The purpose of these guidelines is to maintain acceptable noise levels in a community setting for different land use types. Noise compatibility by different land use types is categorized into four general levels: "normally acceptable," "conditionally acceptable," "normally unacceptable," and "clearly unacceptable." For instance, a noise environment ranging from 50 dBA to 65 dBA CNEL is considered to be "normally acceptable" for multi-family residential uses, while a noise environment of 75 dBA CNEL or above is considered to be "clearly unacceptable" for multi-family residential uses.

In addition, California Government Code Section 65302(f) requires each county and city in the state to prepare and adopt a comprehensive long-range general plan for its physical development, with Section 65302(g) requiring a noise element to be included in its general plan. The noise element must: identify and appraise noise problems in the community; recognize Office of Noise Control guidelines; and analyze and quantify current and projected noise levels.

The state has also established noise insulation standards for new multi-family residential units, hotels, and motels that would be subject to relatively high levels of transportation-related noise. These requirements are collectively known as the California Noise Insulation Standards (Title 24, California Code of Regulations). The noise insulation standards set forth an interior standard of 45 dBA CNEL in any habitable room. Where such units are proposed in areas subject to exterior noise levels greater than 60 dBA CNEL, the standards require an acoustical analysis demonstrating how dwelling units have been designed to meet the interior standard. Title 24 standards are typically enforced by local jurisdictions through the building permit application process.

California Department of Transportation

While there are no state or California Department of Transportation (Caltrans) regulatory vibration standards, the *Caltrans Transportation and Construction Vibration Guidance Manual* (Caltrans 2013) provides guidance and procedures that "should be treated as screening tools for assessing the potential for adverse vibration effects related to human perception, structural damage, and equipment. This document is not an official policy, standard, specification, or regulation, and should not be used as such." The Caltrans vibration criteria for assessing structural damage and human perception are shown in **Table 2.3-3** and **Table 2.3-4***,* respectively (Caltrans 2013).

Table 2.3-3
Caltrans Vibration Structural Damage Potential Criteria

Structure and Condition	Maximum PPV (in/sec)	
	Transient Sources	Continuous/Frequent Intermittent Sources
Extremely fragile historic buildings, ruins, ancient monuments	0.12	0.08
Fragile buildings	0.2	0.1
Historic and some old buildings	0.5	0.25
Older residential structures	0.5	0.3
New residential structures	1.0	0.5
Modern industrial/commercial buildings	2.0	0.5

NOTE: Transient sources create a single isolated vibration event, such as blasting or drop balls. Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack and-seat equipment, vibratory pile drivers, and vibratory compaction equipment.

SOURCE: Caltrans 2013.

Table 2.3-4
Caltrans Vibration Perception Potential Criteria

Structure and Condition	Maximum PPV (in/sec)	
	Transient Sources	Continuous/Frequent Intermittent Sources
Barely perceptible	0.04	0.01
Distinctly perceptible	0.25	0.04
Strongly perceptible	0.9	0.10
Severe	2.0	0.4

NOTE: Transient sources create a single isolated vibration event, such as blasting or drop balls. Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack and-seat equipment, vibratory pile drivers, and vibratory compaction equipment.

SOURCE: Caltrans 2013.

2.3.2.3 Local

City of San Diego General Plan

The Noise Element of the City's General Plan provides goals and policies to guide compatible land uses and incorporate of noise attenuation measures for

new uses, which was amended by the City's 2015 General Plan Amendments (City of San Diego 2015). The overall goal of the Noise Element is controlling noise to acceptable levels at its source. However, when this is not feasible, the City applies additional measures to limit the effect of noise on future land uses, which include spatial separation, site planning, and building design techniques that address noise exposure and the insulation of buildings to reduce interior noise levels.

Specific policies of the Noise Element applicable to the project include noise and land use compatibility; motor vehicle traffic noise; commercial and mixed-use activity noise; construction, refuse vehicles, parking lot sweepers, and public activity noise, and noise attenuating measures.

NE-A.1. Separate excessive noise-generating uses from residential and other noise-sensitive land uses with a sufficient spatial buffer of less sensitive uses.

NE-A.2. Assure the appropriateness of proposed developments relative to existing and future noise levels by consulting the guidelines for noise-compatible land use (shown on Table 3.10-6) to minimize the effects on noise-sensitive land uses.

NE-A.3. Limit future residential and other noise-sensitive land uses in areas exposed to high levels of noise.

NE-A.4. Require an acoustical study consistent with acoustical study guidelines or proposed developments in areas where the existing or future noise level exceeds or would exceed the "compatible" noise level thresholds as indicated on the Land Use - Noise Compatibility Guidelines, so that noise mitigation measures can be included in the project design to meet the noise guidelines.

NE-B.1. Encourage noise-compatible land uses and site planning adjoining existing and future highways and freeways.

NE-B.3. Require noise reducing site design, and/or traffic control measures for new development in areas of high noise to ensure that the mitigated levels meet acceptable decibel limits.

NE-B.4. Require new development to provide facilities which support the use of alternative transportation modes such as walking, bicycling, carpooling and, where applicable, transit to reduce peak-hour traffic.

NE-B.7. Promote the use of berms, landscaping, setbacks, and architectural design where appropriate and effective, rather than conventional wall barriers to enhance aesthetics.

NE-E.1. Encourage the design and construction of commercial and mixed-use structures with noise attenuation methods to minimize excessive noise to residential and other noise-sensitive land uses.

NE-E.2. Encourage mixed-use developments to locate loading areas, parking lots, driveways, trash enclosures, mechanical equipment, and other noisier components away from the residential component of the development.

NE-E.3. Encourage daytime truck deliveries to commercial uses abutting residential uses and other noise-sensitive land uses to minimize excessive nighttime noise unless there is no feasible alternative or there are overriding transportation benefits by scheduling deliveries at other hours.

NE-E.4. Encourage commercial/entertainment uses to utilize operational measures that minimize excessive noise where it affects abutting residential and other noise-sensitive uses.

NE-E.5. Implement night and daytime on-site noise level limits to address noise generated by commercial uses where it affects abutting residential and other noise-sensitive uses.

NE-E.6. Encourage disclosure of potential noise problems for mixed-use and residential developments adjacent to commercial/entertainment uses at the time of sale.

NE-G.1. Implement limits on the hours of operation for non-emergency construction and refuse vehicle and parking lot sweeper activity in residential areas and areas abutting residential areas.

NE-G.2. Implement limits on excessive public noises that a person could reasonably consider disturbing and/or annoying in residential areas and areas abutting residential areas.

NE-I.1. Require noise attenuation measures to reduce the noise to an acceptable noise level for proposed developments to ensure an acceptable interior noise level, as appropriate, in accordance with California's noise insulation standards (CCR Title 24).

NE-I.2. Apply CCR Title 24 noise attenuation measures requirements to reduce the noise to an acceptable noise level for proposed single-family, mobile homes, senior housing, and all other types of residential uses not addressed by CCR Title 24 to ensure an acceptable interior noise level, as appropriate.

NE-I.3. Consider noise attenuation measures and techniques addressed by the Noise Element, as well as other feasible attenuation measures not addressed as potential mitigation measures, to reduce the effect of noise on future residential and other noise-sensitive land uses to an acceptable noise level.

Land use and noise compatibility guidelines are provided for proposed land use development projects. **Table 2.3-5** specifies land use compatibility and exterior/interior noise standards for the land uses included in the project. As

shown in Table 2.3-5, multiple dwelling units are “compatible” with exterior noise levels up to 60 dBA CNEL, and “conditionally compatible” in areas with exterior noise levels of 60 to 70 dBA CNEL, provided that the building structure attenuates interior noise levels to 45 dBA CNEL.

Table 2.3-5
Land Use and Noise Compatibility Guidelines

Land Use Category	Exterior Noise Exposure (dBA CNEL) 60	65	70	75
Residential - Multiple Dwelling Units		45	45	
Institutional – Educational facilities other than Kindergarten through Grade 12 educational facilities		45	45	
Retail/Commercial/Offices			50	50

	Compatible	Indoor Uses	Standard construction methods should attenuate exterior noise to an acceptable indoor noise level.
		Outdoor Uses	Activities associated with the land use may be carried out.
	Conditionally Compatible	Indoor Uses	Building structure must attenuate exterior noise to the indoor noise level indicated by the number (45 or 50) for occupied areas.
		Outdoor Uses	Feasible noise mitigation techniques should be analyzed and incorporated to make the outdoor activities acceptable.
	Incompatible	Indoor Uses	New construction should not be undertaken.
		Outdoor Uses	Severe noise interference makes outdoor activities unacceptable.

SOURCE: City of San Diego 2015.

The City assumes that standard construction techniques would provide a 15 dB reduction of exterior noise levels to an interior receiver (City of San Diego [2008] 2015). With these criteria, standard construction could be assumed to result in interior noise levels of 45 dBA CNEL or less when exterior sources are 60 dBA CNEL or less. When exterior noise levels are greater than 60 dBA CNEL, and the interior threshold is 45 dBA CNEL, consideration of specific construction techniques is required.

The City of San Diego does not address vibration in the Noise Element of the General Plan.

City of San Diego Noise Ordinance

Section 59.5.0401 (Noise Ordinance) of the San Diego Municipal Code (SDMC) prohibits noise exceeding the applicable 1-hour average sound level limits for various land uses in the city on or beyond the boundaries of a property on which the noise is produced. **Table 2.3-6** presents the applicable noise limits.

Table 2.3-6
City of San Diego Applicable Noise Limits

Land Use	One-Hour Average Sound Level (dB)		
	7 a.m. to 7 p.m.	7 p.m. to 10 p.m.	10 p.m. to 7 a.m.
Single Family Residential	50	45	40
Multi-Family Residential (Up to a maximum density of 1/2000)	55	50	45
All other Residential	60	55	50
Commercial	65	60	60
Industrial or Agricultural	75	75	75

SOURCE: City of San Diego 2019.

Section 59.5.0404(a) states that it shall be unlawful for any person, between the hours of 7:00 p.m. of any day and 7:00 a.m. of the following day, or on legal holidays as specified in Section 21.04 of the SDMC, with exception of Columbus Day and Washington's Birthday, or on Sundays, to erect, construct, demolish, excavate for, alter, or repair any building or structure in such a manner as to create disturbing, excessive, or offensive noise unless a permit has been applied for and granted beforehand by the Noise Abatement and Control Administrator.

Additionally, Section 59.5.404(b) states that it shall be unlawful for any person, including the City of San Diego, to conduct any construction activity so as to cause, at or beyond the property lines of any property zoned residential, an average sound level greater than 75 decibels during the 12-hour period from 7 a.m. to 7 p.m.

The City of San Diego does not address vibration in its Municipal Code.

City of San Diego Significance Determination Thresholds

The City's CEQA Significance Determination Thresholds outline the criteria and thresholds used to determine whether project impacts are significant (City of San Diego 2016). Thresholds applicable to the project include traffic noise, stationary

noise generators, sensitive wildlife, construction noise, and noise/land use compatibility, which have been used in this analysis for identifying significant noise impacts applicable to the project.

Traffic Noise Significance Thresholds are provided for structures affected by traffic noise to determine interior and exterior noise impacts from traffic-generated noise in the City's Table K-2 (City of San Diego 2016), as shown in **Table 2.3-7**.

Table 2.3-7
Traffic Noise Significance Thresholds (dBA CNEL)

Structure of Proposed Use That Would Be Impacted by Traffic Noise	Interior Space	Exterior Usable Space[a]	General Indication of Potential Significance
Single-family detached	45 dB	65 dB	Structure or outdoor usable area[b] is <50 feet from the center of the closest (outside) lane on a street with existing or future ADTs >7,500
Multi-family, school, library, hospital, day care center, hotel, motel, park, convalescent home	Development Services Department (DSD) ensures 45 dB pursuant to Title 24	65 dB	
Office, church, business, professional uses	n/a	70 dB	Structure or outdoor usable area is <50 feet from the center of the closest lane on a street with existing or future ADTs >20,000
Commercial, retail, industrial, outdoor spectator sports uses	n/a	75 dB	Structure or outdoor usable area is <50 feet from the center of the closest lane on a street with existing or future ADTs >40,000

[a] If a project is currently at or exceeds the significance thresholds for traffic noise described above and noise levels would result in less than a 3-dB increase, then the impact is not considered significant.

[b] Exterior usable areas do not include residential front yards or balconies unless the areas such as balconies are part of the required useable open space calculation for multi-family units.

SOURCE: City of San Diego 2016.

As shown in Table 2.3-7, the noise level at exterior usable open space for single- and multi-family residences should not exceed 65 dBA CNEL and for commercial or retail space should not exceed 75 dBA CNEL. Table 2.3-7 further specifies that outdoor usable areas would generally indicate a significant noise impact if located closer than 50 feet from the centerline of the closest traffic lane of a street with existing or future daily traffic volumes greater than 20,000 ADT.

Noise significance thresholds for noise generated by adjacent stationary sources such as heating, ventilation, and air conditioning (HVAC) units are identified in the City's Noise Ordinance. A project that would generate noise levels at the

property line that exceed the City's Noise Ordinance Standards, Property Line Noise Level Limits (Table 2.3-6), is considered potentially significant. Although noise levels could be consistent with the City's Noise Ordinance Standards, a noise level above 65 dBA CNEL at the residential property line could be considered a significant environmental impact.

Noise Significance Thresholds for construction noise are provided by the construction hours and noise level limits identified in the City's Noise Ordinance (City of San Diego 2019). Construction activity is prohibited between the hours of 7:00 p.m. of any day and 7:00 a.m. of the following day, or on legal holidays. Construction noise levels measured at or beyond the property lines of any property zoned residential shall not exceed an average sound level greater than 75 dB during the 12-hour period from 7:00 a.m. to 7:00 p.m. (City of San Diego 2010). Additionally, where temporary construction noise would substantially interfere with normal business communication, or affect sensitive receptors, such as day care facilities, a significant noise impact may be identified.

Noise Significance Thresholds for noise/land use compatibility are provided in Table K-4 (City of San Diego 2016), which shows multi-family residential exterior incompatible above 60 dBA CNEL, and updated in the City's General Plan Noise Element (City of San Diego 2015), as shown in Table 2.3-4, exterior "compatible" noise level standard for multi-family residential uses as and as compatible up to 60 dBA CNEL, and conditionally compatible up to 70 dBA CNEL. The City assumes that standard construction design techniques would provide a 15-dB reduction of exterior noise levels to interior noise levels of 45 dBA CNEL or less when exterior sources are 60 dBA CNEL or less. When exterior noise levels are greater than 60 dBA CNEL, consideration of specific construction techniques is required. Multifamily dwelling units with exterior noise levels of up to 70 dBA CNEL are "conditionally compatible" provided that the building structure attenuates interior noise levels to 45 dBA CNEL (City of San Diego 2015).

2.3.3 Analysis of Project Effects and Determination as to Significance

For purposes of this EIR, the identified significance thresholds are based on criteria provided in the City of San Diego's California Environmental Quality Act (CEQA) Significance Determination Thresholds (City of San Diego 2016). Accordingly, a significant noise impact would occur if the project would:

Issue 1: Result in a significant increase in the existing ambient noise levels; or

Issue 2: Result in the exposure of people to noise levels which exceed the City's adopted noise ordinance or are incompatible with Table K-4; or

Issue 3: Expose people to current or future transportation noise levels that exceed standards established in the Transportation Element of the General Plan; or

Issue 4: Expose people to, or generate excessive groundborne vibration or groundborne noise levels; or

Issue 5: Result in land uses which are not compatible with aircraft noise levels as defined by an adopted airport Comprehensive Land Use Plan

2.3.3.1 Ambient Noise

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

Impact Analysis

Community Plan Amendment and Rezone

Construction

The proposed project includes an amendment to the Clairemont Mesa Community Plan (CMCP) and rezone of the project site that would allow for a future residential development. Construction of the future development would include construction noise that is considered temporary and short term (i.e., its effect on the environment ceases upon conclusion of construction activities). A substantial temporary increase in ambient noise levels is defined as a direct project-related increase of 10 dBA L_{eq} or greater, based on the noise standard that a 10 dBA increase is perceived by the human ear as twice as loud (FTA 2018). This FTA threshold is used for evaluating the project's impacts on ambient noise levels.

Construction of the future development would require the use of heavy equipment during foundation concrete pour, building construction/architectural coating, and paving stages at the project site. During each stage of building development, a variety of equipment would be used. As such, construction activity noise levels on and near the project site would fluctuate depending on the type, number, and duration of use of various pieces of construction equipment operating at a given time. Multiple pieces of construction equipment would not operate at the same point on the project site at all times. Accordingly, and to present a conservative analysis, instead of assuming the equipment is on average located in the center of the project construction area (which is a typical assumption in construction noise analyses), it has been assumed that the various equipment types would operate at different distances from the sensitive receptors to represent equipment operating across the entire site (see Appendix H for construction noise calculations).

Types of construction equipment expected to be used during project construction could produce maximum noise levels of 75 dBA L_{max} to 90 dBA L_{max} at a reference distance of 50 feet from the noise source according to the Federal Highway Administration (FHWA) reference noise levels. **Table 2.3-8** lists the construction equipment type assumed for project construction and FHWA reference noise levels (L_{max}) at 50 feet. These maximum noise levels would occur when equipment is operating at full power. Construction equipment does not typically operate at full power consistently throughout the duration of a given construction stage. The estimated usage factor for the equipment is also shown in Table 2.3-8 and represents the percentage of the time during a given construction stage that a piece of equipment is expected to be operational. The usage factors are based on FHWA's RCNM User's Guide (FHWA 2006).

Table 2.3-8
Project Construction Equipment and Associated Noise Levels

Type of Equipment	Reference Noise Level at 50 Feet, Lmax	Estimated Usage Factor (%)
Air Compressor	78	40
Backhoe	78	40
Concrete Saw	90	20
Cranes	81	16
Excavator	81	40
Forklift	75	10
Front End Loader	79	40
Generator Sets	81	50
Graders	85	40
Other Equipment	85	50
Paver	77	50
Pumps	81	50
Roller	80	20
Rubber Tired Loader	79	40
Scraper	84	40
Tractor/Loader/Backhoe	80	25
Vacuum Street Sweeper	82	10

SOURCE: FHWA 2006.

Over the course of a construction day, the highest noise levels would be generated when multiple pieces of construction equipment would be being operated concurrently. The project's estimated construction noise levels were calculated for a scenario in which all construction equipment was assumed to be operating simultaneously and located at the construction area nearest the affected receptors to present a conservative impact analysis. The estimated noise levels at the off-site sensitive receptors were calculated using the FHWA's RCNM, and were based on a maximum concurrent operation of construction equipment (i.e., air compressors, cranes, tractor/loader/backhoe, forklift, generator sets, welders, etc.), which is considered a worst-case evaluation because the project would typically use less overall equipment on a daily basis, and as such would generate lower noise levels. In addition, the noise levels were estimated including the assumption that the building construction phase (i.e., air compressors, cranes, forklift, street sweeper) would overlap into the paving phase (i.e., grader, paver, roller) and the architectural coating phase (i.e., air compressor). **Table 2.3-9** shows the estimated construction noise levels that would attenuate with distance at the nearest off-site sensitive uses during a peak day of construction activity at the project site, including, the existing 6-foot-high privacy wall at the backyard of the single-family residences and the surface parking lot on the SDG&E easement to the west of the project site, which provides barrier attenuation estimated at approximately 5 dBA for the residences west of the project site.

As shown in Table 2.3-9, daytime construction noise levels would result in predicted increases in ambient noise levels ranging from approximately 0 to 14.1 dBA Leq at the receptor locations. As previously discussed, the increase (i.e., net change) in ambient levels determined at the nearest noise sensitive receptors (e.g., residences) is typically considered substantial when the increase is 10 dBA Leq or greater, as a change in sound level of 10 dB is recognized as "twice as loud" (FTA, 2018). Therefore, the increases at ST-1, ST-2, and ST-3 of approximately 14.1, 11.8, and 11.5 dBA Leq, respectively, would be greater than a 10 dBA increase by approximately 4.1, 1.8, and 1.5 dBA Leq, respectively. Therefore, the temporary significant increases in ambient noise levels above existing conditions during construction of the future development would potentially occur at ST-1, ST-2, and ST-3, and would be considered significant impact (**Impact NOI-1**).

Table 2.3-9
Construction Phase Noise Levels – Community Plan Amendment and Rezone

Off-Site Sensitive Land Uses[a]	Location	Existing Noise Level (dBA L_{eq})	Nearest Distance from Construction Activity to Noise Receptor (ft.)[b]	Estimated Construction Noise Levels (dBA L_{eq}) at Residential boundary	Net Change from Existing Noise Levels (dBA L_{eq})	Significant Increase (>10 dBA)?
ST-1	Northwest of the Project Site along Mount Etna Drive	56.9	150	71	14.1	Yes
ST-2	West of the Project Site along Mount Castle Ave	53.2	320	65	11.8	Yes
ST-3	Southwest of the Project Site at property line of adjacent homes	58.5	175	70	11.5	Yes
ST-4	South of the Project Site at corner of Balboa Avenue and Balboa Way	65.7	450	62	0	No

[a] The distance represents the nearest construction area on the project site to the property line of the off-site receptor.

[b] The daytime construction noise levels were estimated including assumption that there will be some building construction phase overlap into the Paving phase. Concrete pour noise levels provided for occurring off-hours without daytime construction.

SOURCE: ESA 2019 (Appendix H)

Operation

Operational noise generated by the future residential development would mainly result from mobile sources and stationary sources, such as rooftop HVAC units. As discussed in Issue 3 below, operational noise from mobile sources would not increase noise levels by greater than 3 dBA at any roadway segment and the difference in noise level would be indistinguishable. Furthermore, any rooftop mechanical units would be subject to the SDMC Section 59.5.0401 of the Noise Ordinance, which specifies maximum one-hour average sound level limits that are the maximum noise levels allowed at any point on or beyond the property boundaries due to activities occurring on the property. Future building design of rooftop HVAC units including orientation and shielding would be subject to the Noise Ordinance regulations and therefore would be limited to the noise levels established in the ordinance. Therefore, project operation of the future residential development would not increase the overall ambient noise levels and impacts would be less than significant.

Site Demolition and Preparation

Prior to the redevelopment of the project site in accordance with the CPA and rezone, the County would demolish the existing unoccupied buildings and related facilities on-site, dispose of demolition debris, conduct rough grading of the site, and stub out all existing utilities connections (i.e., capping of utility lines with protective plugs or caps) to the project site boundary. Site demolition and preparation activities would require the use of heavy equipment, grading/excavation, drainage/utilities/trenching, foundation concrete pour, building construction/architectural coating, and paving stages at the project site. During each stage of demolition and site preparation activities, a variety of equipment would be used. As such, construction activity noise levels on and near the project site would fluctuate depending on the type, number, and duration of use of various pieces of construction equipment operating at a given time. Multiple pieces of construction equipment would not operate at the same point on the project site at all times. Accordingly, and to present a conservative analysis, instead of assuming the equipment is on average located in the center of the project construction area (which is a typical assumption in construction noise analyses), it has been assumed that the various equipment types would operate at different distances from the sensitive receptors to represent equipment operating across the entire site (see Appendix H for construction noise calculations).

The types of construction equipment expected to be used during site demolition and preparation could produce maximum noise levels of 75 dBA L_{max} to 90 dBA L_{max} at a reference distance of 50 feet from the noise source according to FHWA reference noise levels. Table 2.7-8 above lists the construction equipment type assumed for site demolition and preparation activities (except pavers) and FHWA reference noise levels (L_{max}) at 50 feet. As previously detailed, these maximum noise levels would occur when equipment is operating at full power. Construction equipment does not typically operate at full power consistently throughout the duration of a given construction stage. The estimated usage factor for the equipment is also shown in Table 2.7-8 and represents the percentage of the time during a given construction stage that a piece of equipment is expected to be operational. The usage factors are based on FHWA's RCNM User's Guide (FHWA 2006).

As previously detailed, the estimated noise levels at the off-site sensitive receptors were calculated using the FHWA's RCNM, and were based on a maximum concurrent operation of equipment, which is considered a worst-case evaluation because the project would typically use less overall equipment on a daily basis, and as such would generate lower noise levels.

Table 2.3-10 shows the estimated construction noise levels that would attenuate with distance at the nearest off-site sensitive uses during a peak day of construction activity at the project site. In addition, the 6-foot-high privacy wall at

the backyard of single-family residences and the surface parking lot to the west of the project site was estimated to provide barrier attenuation of approximately 5 dBA for the residences west of the project site.

Table 2.3-10
Construction Phase Noise Levels – Site Demolition and Preparation

Off-Site Sensitive Land Uses[a]	Location	Existing Noise Level (dBA L_{eq})	Nearest Distance from Construction Activity to Noise Receptor (ft.)[b]	Estimated Construction Noise Levels (dBA L_{eq}) at Residential Boundary	Net Change from Existing Noise Levels (dBA L_{eq})	Significant Increase (>10 dBA)?
ST-1	Northwest of the Project Site along Mount Etna Drive	56.9	150	69	12.1	Yes
ST-2	West of the Project Site along Mount Castle Ave	53.2	320	64	10.8	Yes
ST-3	Southwest of the Project Site at property line of adjacent homes	58.5	175	68	9.5	No
ST-4	South of the Project Site at corner of Balboa Avenue and Balboa Way	65.7	450	61	0	No

[a] The distance represents the nearest construction area on the project site to the property line of the off-site receptor.

[b] The daytime construction noise levels were estimated including assumption that there will be some phase overlap.

SOURCE: ESA 2019 (Appendix H)

As shown in Table 2.3-10, daytime construction noise levels would result in predicted increases in ambient noise levels ranging from 0 to 12.1 dBA Leq at receptor locations. As previously discussed, the increase (i.e., net change) in ambient levels determined at the nearest noise sensitive receptors (e.g., residences) is typically considered substantial when the increase is 10 dBA Leq or greater, as a change of 10 dB is recognized as “twice as loud.” (FTA 2018). Therefore, the increases of at ST-1 and ST-2 of 12.1 and 10.8 dBA Leq, respectively, as shown in Table 2.3-10, exceeds a 10 dBA increase by 2.1 and 0.8 dBA Leq, respectively. Therefore, the temporary significant increases in ambient noise levels above existing conditions during site demolition and preparation would potentially occur at ST-1 and ST-2, and would be considered a significant impact (**Impact NOI-1**).

2.3.3.2 Noise Ordinance

Issue 2: Would the project result in the exposure of people to noise levels which exceed the City's adopted noise ordinance or are incompatible with Table K-4?

Noise impacts may be significant if the project would expose people to noise levels that exceed the City's adopted Noise Ordinance for construction and operation. The City's Noise Ordinance limits construction noise levels to not exceed 75 dBA L_{eg} at the affected residential property line during the allowable construction hours of 7 a.m. to 7p.m., and 45 dBA L_{eg} from 7 p.m. to 10 p.m.).

Impact Analysis

Community Plan Amendment and Rezone and Site Demolition and Preparation

Construction

Project construction (including both construction of the future development and site demolition and preparation activities) would occur during the hours specified in the SDMC, between 7:00 a.m. and 7:00 p.m. Construction activity is prohibited on legal holidays as specified in Section 21.04 of the SDMC, with exception of Columbus Day and Washington's Birthday, and on Sundays.

Construction activities occurring under each of the construction phases (i.e., demolition and clearing, excavation, foundation, erection, and finishing) would require the use of heavy equipment (e.g., excavators, backhoes, loaders, graders, bore/drill rigs, compactors, cranes, etc.) along with the use of smaller power tools, generators, and other sources of noise. During each construction phase there would be a different mix of equipment operating and noise levels would vary based on the amount of equipment in operation and the location of each activity. Construction activity noise levels at the site would therefore fluctuate depending on the particular type, number, and duration of use of the various pieces of construction equipment. Table 2.3-9 and Table 2.3-10 above presents the typical maximum noise levels (dBA L_{eq}) generated by construction phases.

The closest noise-sensitive receiver (single-family residence) is located approximately 150 feet from the project site. The construction phases generating the highest noise levels would be approximately 71 dBA L_{eq} at ST-1, as shown in Table 2.3-9. Construction noise levels at all other receptors would also be below the City's 75 dBA L_{eq} significance threshold established by the City's Noise Ordinance. Therefore, construction noise would not exceed the City's adopted Noise Ordinance and impacts would be less than significant.

Operation

As discussed in Issue 1, above, operation of the future development would be subject to the City's Noise Ordinance standards that limit operational noise to a maximum level within the property boundaries. Roadway noise levels would increase noise levels by a maximum of 1.2 dBA and ambient noise level changes would be indistinguishable by the human ear. Therefore, operational noise associated with the future development would not exceed the City's Noise Ordinance and impacts would be less than significant.

2.3.3.3 General Plan

Issue 3: Would the project expose people to current or future transportation noise levels that exceed standards established in the Transportation Element of the General Plan?

Noise impacts may be significant if the project would expose people to current or future transportation noise levels that exceed standards established in the Transportation Element of the General Plan (interior standard of 45 dBA CNEL residential; exterior standard of 65 dBA CNEL residential).

Impact Analysis

Community Plan Amendment and Rezone and Site Demolition and Preparation

Off-Site Construction

Construction truck trips associated with construction of the future development and associated with site demolition and preparation activities would occur throughout the construction period. Haul trucks would travel on approved truck routes designated within the city. Given the project site's proximity to I-5 and I-805, heavy truck traffic would take the most direct route to the appropriate freeway ramps. An estimated maximum of approximately 170 daily worker vehicle trips and approximately 79 concrete truck trips would occur per day (up to approximately 21 worker trips and 10 concrete truck trips per hour) during the building construction activities. The building construction activities would generate the maximum number of trucks trips. Trucks would exit the project site from Genesee Avenue and turn right and head southbound, head east on Balboa Avenue, and merge on to the I-805 on-ramp. Alternatively, vehicles could head west on Balboa Avenue and merge onto the I-5 on-ramp. Construction worker vehicle trips would be dispersed along various roadways and would contribute a very small number of vehicle trips when compared to existing traffic volumes on these same roadways and compared to the truck trips along the route. However, for the purposes of this analysis, it was conservatively assumed that construction worker vehicle trips would travel on the same roadway segments as the heavy trucks to evaluate maximum potential offsite noise impacts.

As shown in **Table 2.3-11** the project's truck trips and worker trips would generate maximum noise levels of approximately 55.7 dBA L_{eq} along Genesee Avenue and Balboa Avenue. Therefore, construction of the proposed project would not expose people to transportation noise levels that exceed standards established in the General Plan.

Table 2.3-11
Estimated Off-Site Construction Traffic Noise Levels

	Calculated Traffic Noise Levels On Roadway dBA L_{eq}		
Roadway Segment	**Construction Traffic**	**Significance Threshold[a]**	**Exceed Threshold?**
Genesee Ave between Mount Etna Drive and Balboa Ave	55.7	71.7	No
Balboa Ave between Genesee Ave and Shopping Center Driveway	55.7	72.8	No

[a] The significance thresholds are the calculated roadway noise levels for the applicable traffic segments

SOURCE: ESA 2019 (Appendix H)

Off-Site Operational Traffic Noise

Operational noise is typically considered permanent, i.e., for the duration of the operation of the constructed facility. A significant permanent increase is conservatively defined as a direct project-related permanent ambient increase of 3 dBA L_{eq} or greater, where exterior noise levels currently exceed the City's Noise Ordinance noise level limits (i.e., 50 dBA L_{eq} daytime for single-family residential land uses). An increase of 3 dBA is perceived by the human ear as a barely perceptible increase.

Existing roadway noise levels were calculated along various arterial segments adjacent to the project site. Roadway noise attributable to operation of the future residential development was calculated using the traffic noise model previously described and was compared to existing noise levels in the vicinity.

Operational traffic noise levels associated with existing conditions are shown in **Table 2.3-12**. As indicated in the table, the maximum increase in project-related traffic noise levels over existing traffic noise levels would be 1.7 dBA CNEL, which would occur at the roadway segment of Mount Everest Drive south of Mount Alifan Drive. This increase in sound level would be below the significance threshold of 3 dBA CNEL. The increase in sound levels would be lower at the remaining roadway segments analyzed. Accordingly, the project-related noise increases would be less than the applicable threshold. Therefore, operation of the project compared to existing conditions would not result in off-site traffic-

related noise impacts in excess of City standards and impacts would be less than significant.

Table 2.3-12
Estimated Off-Site Traffic Noise Levels – Existing with Project Conditions

Roadway Segment	Existing Land Uses Located along Roadway Segment	CNEL (dBA) Existing (A)	Existing with Project (B)	Project Increment (B–A)	Exceed Threshold?
Genesee Avenue					
n/o Clairemont Mesa Boulevard	Residential/ Commercial	71.9	71.9	0.1	No
between Clairemont Mesa Boulevard and Bannock Avenue	Residential/ Commercial	71.4	71.4	0.1	No
between Bannock Avenue and Chateau Drive	Residential	71.6	71.7	0.1	No
between Chateau Drive and Mount Herbert Avenue	Residential	71.5	71.6	0.1	No
between Mount Herbert Avenue and Derrick Drive	Residential/ Commercial	71.3	71.4	0.1	No
between Derrick Drive and Mount Etna Drive	Commercial	71.6	71.8	0.2	No
between Mount Etna Drive and Balboa Avenue	Commercial	71.7	71.9	0.3	No
between Balboa Avenue and Mount Alifan Drive	Residential/ Commercial	71.1	71.1	0.1	No
s/o Mount Alifan Drive	Residential/ Commercial/ Educational	72.0	72.1	0.1	No
Mount Everest Drive					
s/o Mount Alifan Drive	Residential	62.2	63.9	1.7	No
Balboa Avenue					
between Clairemont Drive and Mount Everest Boulevard	Residential	73.1	73.1	0.1	No
between Mount Everest Boulevard and Genesee Avenue	Residential/ Commercial	72.6	72.6	0.0	No
between Genesee Avenue and Shopping Center Driveway	Commercial	72.8	72.9	0.1	No
between Shopping Center Driveway and Mount Abernathy Avenue	Commercial	73.2	73.3	0.1	No

Roadway Segment	Existing Land Uses Located along Roadway Segment	CNEL (dBA) Existing (A)	Existing with Project (B)	Project Increment (B–A)	Exceed Threshold?
between Mount Abernathy Avenue and Cannington Drive	Residential/ Commercial	73.7	73.8	0.1	No
between Cannington Drive and Charger Boulevard	Residential/ Educational	73.9	74.0	0.1	No
between Charger Boulevard and I-805 Southbound Ramps	Residential/ Religious	74.8	74.9	0.1	No
between I-805 Southbound Ramps and I-805 Northbound Ramps	Freeway Overpass	74.4	74.4	0.0	No
e/o I-805 Northbound Ramps	Commercial	74.6	74.6	0.0	No

ESA 2019, Chen Ryan 2019.

Operational traffic noise levels associated with buildout year conditions are shown in **Table 2.3-13**. As indicated in the table, the maximum increase in project-related traffic noise levels over buildout year traffic noise levels would be 1.7 dBA CNEL, which would occur at the roadway segment of Mount Everest Drive south of Mount Alifan Drive. This increase in sound level would be below the significance threshold of 3 dBA CNEL. The increase in sound levels would be lower at the remaining roadway segments analyzed. Accordingly, the project-related noise increases would be less than the applicable threshold. Therefore, operation of the project at the buildout year would not result in off-site traffic-related noise impacts in excess of City standards and impacts would be less than significant.

Operational traffic noise levels associated with future year conditions (2050) are shown in **Table 2.3-14**. As indicated, the maximum increase in project-related traffic noise levels over existing traffic noise levels would be 1.4 dBA CNEL, which would occur at the roadway segment of Mount Everest Drive south of Mount Alifan Drive. This increase in sound level would be below the significance threshold of 3 dBA CNEL. The increase in sound levels would be lower at the remaining roadway segments analyzed. Accordingly, the project-related noise increases would be less than the applicable threshold. Therefore, operation of the project at the future year (2050) would not result in off-site traffic-related noise impacts in excess of City standards and impacts would be less than significant.

Table 2.3-13
Estimated Off-Site Traffic Noise Levels – ~~Buildout~~Near-Term Year with Project Conditions

Roadway Segment	Existing Land Uses Located along Roadway Segment	CNEL (dBA) ~~Existing~~ Near-term (A)	~~Existing~~ Near-term with Project (B)	Project Increment (B–A)	Exceed Threshold?
Genesee Avenue					
n/o Clairemont Mesa Boulevard	Residential/ Commercial	71.9	72.0	0.1	No
between Clairemont Mesa Boulevard and Bannock Avenue	Residential/ Commercial	71.4	71.5	0.1	No
between Bannock Avenue and Chateau Drive	Residential	71.7	71.8	0.1	No
between Chateau Drive and Mount Herbert Avenue	Residential	71.5	71.7	0.1	No
between Mount Herbert Avenue and Derrick Drive	Residential/ Commercial	71.4	71.5	0.1	No
between Derrick Drive and Mount Etna Drive	Commercial	71.7	71.9	0.2	No
between Mount Etna Drive and Balboa Avenue	Commercial	71.8	72.0	0.3	No
between Balboa Avenue and Mount Alifan Drive	Residential/ Commercial	71.6	71.7	0.1	No
s/o Mount Alifan Drive	Residential/ Commercial/ Educational	72.2	72.2	0.1	No
Mount Everest Drive					
s/o Mount Alifan Drive	Residential	62.2	63.9	1.7	No
Balboa Avenue					
between Clairemont Drive and Mount Everest Boulevard	Residential	73.2	73.3	0.1	No
between Mount Everest Boulevard and Genesee Avenue	Residential/ Commercial	72.7	72.7	0.0	No
between Genesee Avenue and Shopping Center Driveway	Commercial	73.0	73.2	0.1	No
between Shopping Center Driveway and Mount Abernathy Avenue	Commercial	73.4	73.5	0.1	No

Roadway Segment	Existing Land Uses Located along Roadway Segment	CNEL (dBA) ~~Existing~~ Near-term (A)	~~Existing~~ Near-term with Project (B)	Project Increment (B–A)	Exceed Threshold?
between Mount Abernathy Avenue and Cannington Drive	Residential/ Commercial	74.0	74.1	0.1	No
between Cannington Drive and Charger Boulevard	Residential/ Educational	74.1	74.2	0.1	No
between Charger Boulevard and I-805 Southbound Ramps	Residential/ Religious	75.2	75.3	0.1	No
between I-805 Southbound Ramps and I-805 Northbound Ramps	Freeway Overpass	74.4	74.5	0.0	No
e/o I-805 Northbound Ramps	Commercial	74.6	74.6	0.0	No

SOURCES: ESA 2019, Chen Ryan 2019.

Table 2.3-14
Estimated Off-Site Traffic Noise Levels – Future (2050) with Project Conditions

Roadway Segment	Existing Land Uses Located along Roadway Segment	CNEL (dBA) ~~Existing~~ Future (2050) (A)	Existing with Project (B)	Project Increment (B–A)	Exceed Threshold?
Genesee Avenue					
n/o Clairemont Mesa Boulevard	Residential/ Commercial	73.0	73.0	0.0	No
between Clairemont Mesa Boulevard and Bannock Avenue	Residential/ Commercial	72.0	72.1	0.1	No
between Bannock Avenue and Chateau Drive	Residential	72.2	72.2	0.1	No
between Chateau Drive and Mount Herbert Avenue	Residential	71.9	72.0	0.1	No
between Mount Herbert Avenue and Derrick Drive	Residential/ Commercial	71.8	71.9	0.1	No
between Derrick Drive and Mount Etna Drive	Commercial	72.2	72.4	0.1	No

Roadway Segment	Existing Land Uses Located along Roadway Segment	CNEL (dBA) ~~Existing~~ Future (2050) (A)	Existing with Project (B)	Project Increment (B–A)	Exceed Threshold?
between Mount Etna Drive and Balboa Avenue	Commercial	72.4	72.6	0.2	No
between Balboa Avenue and Mount Alifan Drive	Residential/ Commercial	71.7	71.7	0.1	No
s/o Mount Alifan Drive	Residential/ Commercial/ Educational	72.7	72.7	0.1	No
Mount Everest Drive					
s/o Mount Alifan Drive	Residential	63.4	64.8	1.4	No
Balboa Avenue					
between Clairemont Drive and Mount Everest Boulevard	Residential	73.7	73.7	0.1	No
between Mount Everest Boulevard and Genesee Avenue	Residential/ Commercial	73.5	73.5	0.0	No
between Genesee Avenue and Shopping Center Driveway	Commercial	73.4	73.5	0.1	No
between Shopping Center Driveway and Mount Abernathy Avenue	Commercial	73.7	73.8	0.1	No
between Mount Abernathy Avenue and Cannington Drive	Residential/ Commercial	74.1	74.2	0.1	No
between Cannington Drive and Charger Boulevard	Residential/ Educational	74.1	74.2	0.1	No
between Charger Boulevard and I-805 Southbound Ramps	Residential/ Religious	75.0	75.1	0.1	No
between I-805 Southbound Ramps and I-805 Northbound Ramps	Freeway Overpass	74.5	74.5	0.0	No
e/o I-805 Northbound Ramps	Commercial	74.8	74.8	0.0	No

ESA 2019, Chen Ryan 2019.

2.3.3.4 Groundborne Vibration

Issue 4: Would the project expose people to, or generate excessive groundborne vibration or groundborne noise levels?

Noise impacts may be significant if the project would expose people or structures to construction vibration levels which exceed vibration guidelines for structural damage and human annoyance. Vibration would have a significant impact if project construction activities cause groundborne vibration levels to exceed the building damage threshold of 0.2 in/sec PPV at receiving structures. Caltrans defines vibration levels of 0.035 in/sec PPV as barely perceptible and is used as the threshold for human annoyance.

Impact Analysis

Community Plan Amendment and Rezone and Site Demolition and Preparation

Groundborne vibration would be generated from heavy construction equipment operation at the project site, which could potentially affect the existing sensitive land uses surrounding the site. The closest vibration-sensitive land use to the project site is the commercial building located approximately 50 feet to the southeast of the project boundary. The nearest residence is located approximately 150 feet to the west of the project boundary.

Project construction (including both construction of the future development and site demolition and preparation activities) would generate varying degrees of ground vibration, depending on the construction procedures and the construction equipment used. The PPV vibration velocities for several types of construction equipment measured at increasing distances are identified in **Table 2.3-15**.

Table 2.3-15
Vibration Source PPV Levels for Construction Equipment

	Approximate PPV (in/sec)			
Equipment	**50 Feet**	**75 Feet**	**100 Feet**	**150 Feet**
Large Bulldozer	0.031	0.017	0.011	0.006
Bore/Drill Rig	0.031	0.017	0.011	0.006
Loaded Trucks	0.027	0.015	0.010	0.005
Jackhammer	0.012	0.007	0.004	0.002
Small Bulldozer	0.001	0.0006	0.0004	0.0002

SOURCE: FTA 2018, ESA 2019.

As shown in Table 2.3-15, the maximum vibration levels at the nearest sensitive receptor 50 feet southeast of the site would be 0.031 in/sec. This is well below the structural damage threshold of 0.2 in/sec and below the barely perceptible level for human annoyance of 0.035 in/sec. Therefore, vibration impacts from project construction would be less than significant.

Project operation would not result in operational sources of vibration causing appreciable groundborne vibration on site or in proximity to structures or people, and impacts would be less than significant.

2.3.3.5 Aircraft Noise Levels

Issue 5: 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?

Community Plan Amendment and Rezone and Site Demolition and Preparation

As previously detailed, the nearest public airport is Montgomery Field Airport, located approximately 2 miles east of the project site. The nearest private airstrip is the MCAS Miramar, located approximately 2.9 miles northeast of the project site. According to the Montgomery Field Airport Land Use Compatibility Plan (ALUCP) and the MCAS Miramar ALUCP, the project site is not within any safety zones for either airport (ALUC 2010; ALUC 2008). However, the project site is located within Montgomery Field and MCAS Miramar's Airport Influence Area denoted as Review Area 2 (ALUC 2010; ALUC 2008). For both airports, Review Area 2 would not be subject to any noise standards. Therefore, the proposed project would not result in land uses which are incompatible with aircraft noise levels. No impact would occur.

2.3.4 Cumulative Impact Analysis

Construction

The potential for cumulative construction noise impacts from on-site construction activities to occur is based on the distance between the project and each of the related cumulative projects. As listed in Table 1-3 of Chapter 1.0, Project Description, of this EIR, there are six related projects identified in the vicinity of the project site. The two closest related projects are the High Tech High Clairemont Campus CUP at 5331 Mount Alifan Drive approximately 1,300 feet from the project site and the Lindbergh-Schweitzer Elementary School project at 4133 Mount Albertine Avenue approximately 3,800 feet from the project site. All other related projects are located at further distances away from the project site and thus would have lesser effects.

The High Tech High Clairemont Campus project involves occupying an already existing building and would not require any construction and thus would not

contribute to cumulative noise levels. The Lindberg-Schweitzer Elementary School project involves relocating a charter school campus to the existing campus and would include construction extending through January 1, 2024. At a distance of 3,800 feet, the Lindberg-Schweitzer Elementary School project would not contribute to cumulative noise levels at sensitive receptors near the project site. Therefore, cumulative impacts from construction noise would be less than significant.

Operations

Cumulative off-site operational noise impacts would occur primarily as a result of increased traffic on local roadways due to operation of the project and cumulative projects, as traffic is the greatest source of operational noise in the project area. Cumulative off-site traffic-generated noise impacts were assessed based on a comparison of the future cumulative base traffic volumes (2050) with the project compared to the existing base traffic volumes without the project. The future cumulative base traffic volumes with the project represent an estimate of the ambient background growth, related projects traffic, and the project traffic volumes. Thus, cumulative increase represents the increment by the ambient background growth, related project traffic, and the project traffic volumes over the existing conditions. The results of that comparison are provided in **Table 2.3-16**. Table 2.3-16 shows the project's contribution to the cumulative noise levels. The maximum cumulative noise increase from the project plus related project traffic would be 2.5 dBA CNEL, which would occur along Mount Everest Drive south of Mount Alifan Drive. This increase in sound level would not exceed the significance thresholds of an increase of 3 or 5 dBA CNEL. As a result, the project's contribution to off-site traffic-related noise would not be cumulatively considerable and impacts would be less than significant.

Table 2.3-16
Off-Site Traffic Noise Impacts – Future 2050 Cumulative Increment

		CNEL (dBA)			
			Future with Project (2050)	Cumulative Increment	
Roadway Segment	Existing Land Uses Located along Roadway Segment	Existing (A)	(B)	(B–A)	Exceed Threshold?
Genesee Avenue n/o Clairemont Mesa Boulevard	Residential/ Commercial	71.9	73.0	1.2	No
between Clairemont Mesa Boulevard and Bannock Avenue	Residential/ Commercial	71.4	72.1	0.7	No

Roadway Segment	Existing Land Uses Located along Roadway Segment	CNEL (dBA)			
		Existing	Future with Project (2050)	Cumulative Increment	Exceed Threshold?
		(A)	(B)	(B–A)	
between Bannock Avenue and Chateau Drive	Residential	71.6	72.2	0.6	No
between Chateau Drive and Mount Herbert Avenue	Residential	71.5	72.0	0.5	No
between Mount Herbert Avenue and Derrick Drive	Residential/ Commercial	71.3	71.9	0.6	No
between Derrick Drive and Mount Etna Drive	Commercial	71.6	72.4	0.7	No
between Mount Etna Drive and Balboa Avenue	Commercial	71.7	72.6	1.0	No
between Balboa Avenue and Mount Alifan Drive	Residential/ Commercial	71.1	71.7	0.7	No
s/o Mount Alifan Drive	Residential/ Commercial/ Educational	72.0	72.7	0.7	No
Mount Everest Drive s/o Mount Alifan Drive	Residential	62.2	64.8	2.5	No
Balboa Avenue between Clairemont Drive and Mount Everest Boulevard	Residential	73.1	73.7	0.7	No
between Mount Everest Boulevard and Genesee Avenue	Residential/ Commercial	72.6	73.5	0.8	No
between Genesee Avenue and Shopping Center Driveway	Commercial	72.8	73.5	0.7	No
between Shopping Center Driveway and Mount Abernathy Avenue	Commercial	73.2	73.8	0.6	No
between Mount Abernathy Avenue and Cannington Drive	Residential/ Commercial	73.7	74.2	0.5	No
between Cannington Drive and Charger Boulevard	Residential/ Educational	73.9	74.2	0.4	No
between Charger Boulevard and I-805 Southbound Ramps	Residential/ Religious	74.8	75.1	0.3	No
between I-805 Southbound Ramps and I-805 Northbound Ramps	Freeway Overpass	74.4	74.5	0.2	No
e/o I-805 Northbound Ramps	Commercial	74.6	74.8	0.3	No

ESA 2019, Chen Ryan 2019.

As is true for the project, cumulative projects would be subject to compliance with SDMC Section 59.5.0401 of the Noise Ordinance, which specifies maximum one-hour average sound level limits are the maximum noise levels allowed at any point on or beyond the property boundaries due to activities occurring on the property. Cumulative projects would be subject to the Noise Ordinance regulations and therefore would be limited to the noise levels established in the ordinance. Therefore, cumulative project operation would not increase the overall ambient noise levels and cumulative impacts would be less than significant.

Groundborne Vibration

Due to the rapid attenuation characteristics of groundborne vibration and distance from each of the cumulative projects to the project site, there is no potential for cumulative construction- or operational-period impacts with respect to groundborne vibration. Therefore, potential cumulative groundborne vibration impacts would be less than significant.

2.3.5 Significance of Impacts Prior to Mitigation

The following significant impact related to ambient noise levels would occur during construction of the proposed project:

> **Impact NOI-1**: A temporary increase in ambient noise levels 10 dBA or more above existing (ambient) conditions at off-site sensitive receivers during construction of the future residential housing project would occur (during both construction of the future development and during site demolition and preparation activities), and impacts would be considered significant.

2.3.6 Mitigation

> **NOI-1: Construction Noise.** The following construction noise abatement techniques shall be implemented by the construction contractor to reduce construction-related noise to less than a 10 dBA increase in existing ambient noise levels at nearby noise-sensitive receivers:
>
> - Temporary noise barriers shall be placed to block the line-of-sight between construction equipment operation and the residential land uses in proximity to the proposed project's property line to the north and west. One of the following two options shall be implemented by the construction contractor:
>
> a. A temporary noise barrier shall be placed along the entire western property line of the project site and approximately 50 feet to the north from the northwestern corner at a height of 14 feet with noise blankets capable of achieving sound level

reductions of at least 8 dBA to block the line-of-sight between construction equipment operations and the offsite noise-sensitive receivers to the south and southwest; or

b. A temporary 50-by-50-foot “L-shaped” noise barrier shall be constructed for each small construction area at a height of 14 feet with noise blankets capable of achieving sound level reductions of at least 8 dBA to block the line-of-sight between construction equipment operations and the offsite noise-sensitive receivers.

2.3.7 Conclusion

The proposed project would not result in impacts related to exposure of people or noise levels that exceed the City’s adopted Noise Ordinance, exposure of people to current or future transportation noise levels that exceed standards of the General Plan, exposure of people to excessive groundborne vibration, or exposure to incompatible aircraft noise levels.

A temporary substantial increase in ambient noise levels above existing conditions (greater than a 10 dBA increase) at specified off-site sensitive receivers during project construction would potentially occur (during both construction of the future development and during site demolition and preparation activities). However, with implementation of **Mitigation Measure NOI-1**, construction noise levels would be reduced by 8 dBA Leq at the source, thereby, reducing the noise levels at all of the sensitive receptor locations to acceptable levels. With implementation of this mitigation measure, impacts related to construction noise would result in a less than significant impact.

SOURCE: ESA, 2019

Mount Etna Community Plan Amendment and Rezone Project

Figure 2.3-1
Noise Measurement Locations

ESA

2.4 Transportation and Traffic

This section provides an assessment of potential impacts related to transportation that could result from implementation of the proposed project. Information used in this section is from the Transportation Impact Study (TIS) (Appendix I-1), the TIS Addendum (Appendix I-2), ~~and~~ the VMT Addendum (Appendix I-3), and the revised traffic analysis tables and Synchro worksheets (Appendix I-4), prepared by Chen Ryan for the proposed project (Chen Ryan 2019), which are all included as Appendix I of this EIR.

Comments related to traffic received during the public comment period for the Notice of Preparation (NOP) included concerns related to traffic congestion on surrounding streets and intersection delays. These concerns have been considered and addressed, as applicable, in the following evaluation of the project's potential to create transportation and traffic impacts. The NOP and all comment letters received in response to the NOP are included in Appendix A of this EIR.

2.4.1 Existing Conditions

2.4.1.1 Traffic Study Area

The study area represents the most likely locations to be impacted by project traffic. Identification of the traffic study area was based on the criteria identified in the City of San Diego's (City's) Traffic Impact Study Manual (1998). Specifically, these criteria require that a traffic study include the following:

- All intersection and roadway segments where the project would add 50 or more peak hour trips in either direction;
- Mainline freeway locations where the project would add 150 or more peak hour trips in either direction; and
- Metered freeway ramps where the Project would add 20 or more peak hour trips.

As shown on **Figure 2.4-1**, the project study area includes 20 intersections (two of which include metered freeway ramps) and 20 roadway segments including Genesee Avenue, Mount Everest Boulevard, Mount Etna Drive, and Balboa Avenue. The proposed project would not contribute enough traffic (150 peak hour trips in a single direction) to require analysis of any mainline freeways.

Traffic counts were conducted at the study area roadway segments and study area intersections ~~in~~ on Tuesday, January 29, 2019 when all schools were in session and the weather was dry and normal. This section describes existing daily traffic volumes (24-hour volume counts) and LOS for study area roadway

segments and the AM/PM peak hour traffic volumes and LOS for the study area intersections.

Level of Service

Level of Service (LOS) is a quantitative measure describing operational conditions within a traffic stream, and the motorist's and/or passengers' perception of operations. A LOS definition generally describes these conditions in terms of such factors as delay, speed, travel time, freedom to maneuver, interruptions in traffic flow, queuing, comfort, and convenience. LOS designations range from A to F, with LOS A representing the best operating conditions (i.e., little to no delay) and LOS F representing the worst operating conditions (i.e., lengthy delay). LOS designation is reported differently for signalized and unsignalized intersections, as well as for roadway segments. The City of San Diego considers LOS D or better during the AM and PM peak hours to be acceptable for intersection and roadway segment LOS.

2.4.1.2 Existing Circulation System

The project site is located in the Clairemont Mesa Community Planning (CMCP) Area in the City, where regional access is provided primarily by I-805. Local access is provided via Genesee Avenue, Mount Everest Boulevard, Balboa Avenue, and Mount Etna Drive, which are described below.

Interstate 805 (I-805) is a north-south freeway that is located approximately one and a half miles east of the project site. Access from I-805 to the study area is provided by the Balboa Avenue interchange.

Genesee Avenue is a 4-lane roadway that widens to 6 lanes between Derrick Drive and Mount Etna Drive, transitions to 5 lanes (3 northbound, 2 southbound) between Mount Etna Drive to Mount Alifan, and narrows again back to 4 lanes after Mount Alifan. Genesee Avenue has a raised median throughout the study area with exception to the roadway segment between Clairemont Mesa Boulevard and Bannock Avenue. The posted speed limit along Genesee Avenue is 35 mph with exception of the roadway segment between Sauk Avenue and Derrick Drive which is 40 mph. Sidewalks are present on both sides of the roadway within the Project study area. On-street parallel parking is allowed along Genesee Avenue on segments south of Mount Alifan Drive and north of Sauk Avenue within the study area. Also, within the study area, Genesee Avenue has class II bike lanes throughout with exception of the class III bike route between Sauk Avenue and Appleton Street. The CMCP classifies this roadway as a 4-Lane Major Arterial. San Diego Metropolitan Transit System (MTS) Bus Route #41 operates along Genesee Avenue.

Mount Everest Boulevard is a 2-lane undivided roadway with sidewalks and on-street parallel parking present on both sides of the roadway. There are no bicycle facilities along Mount Everest within the Project study area. Mount Everest Boulevard has a posted speed limit of 25 mph within the Project study area. The CMCP classifies Mount Everest Boulevard, south of Balboa Avenue as a 2-lane Collector. There are not transit routes that run along Mount Everest Boulevard; however, transit stops exist for bus route #27 at the Balboa Avenue and Mount Everest Boulevard intersection.

Balboa Avenue is currently constructed as a four to six-lane roadway within the Clairemont Mesa community. San Diego MTS Bus Route #27 operates along Balboa Avenue. Within the project study area, Balboa Avenue has a posted speed limit of 45 mph with the following geometric features:

- 4-lane roadway with a raised median between Clairemont Drive and Genesee Avenue. Sidewalks are located intermittently on the northern side of the roadway. Class II bike lanes are present on both side of the roadway. On-street parking is prohibited along this segment. The CMCP classifies this segment as a 4-Lane Major Arterial.
- 6-lane roadway with a raised median between Genesee Avenue and east of I-805. Sidewalk and Class II bike lanes are present on both side of the roadway. On-street parking is prohibited along this segment. The CMCP classifies this segment as a 6-Lane Major Arterial.

Mount Etna Drive is a 2-lane undivided roadway with sidewalks on both sides without bicycle facilities. On-street parallel parking is allowed throughout the segment with exception of the commercial fronting property extending 430 feet west of Genesee Avenue and across a portion of the project frontage. The posted speed limit is 25 mph, between Genesee Avenue and 500 feet west of Genesee Avenue where the posted speed limit of 15 mph per hour begins paired with roadway speed bumps. There are no transit routes that run along Mount Etna Drive; however, transit stops exist for bus route #41 at the Genesee Avenue & Mount Etna Drive intersection.

Roadway Segments

The following 20 roadway segments comprise the project study area for transportation:

1. Genesee Avenue between Appleton Street & Clairemont Mesa Boulevard;
2. Genesee Avenue between Clairemont Mesa Boulevard & Bannock Avenue;
3. Genesee Avenue between Bannock Avenue & Chateau Drive;

4. Genesee Avenue between Chateau Drive & Mount Herbert Avenue;
5. Genesee Avenue between Mount Herbert Avenue & Derrick Drive;
6. Genesee Avenue between Derrick Drive & Mount Etna Drive;
7. Genesee Avenue between Mount Etna Drive & Balboa Avenue;
8. Genesee Avenue between Balboa Avenue & Mount Alifan Drive;
9. Genesee Avenue between Mount Alifan Drive & Genesee Court;
10. Mount Everest Boulevard between Mount Etna Drive & Balboa Avenue;
11. Mount Etna Drive between Mount Everest Boulevard & Genesee Avenue;
12. Balboa Avenue between Clairemont Drive & Mount Everest Boulevard;
13. Balboa Avenue between Mount Everest Boulevard & Genesee Avenue;
14. Balboa Avenue between Genesee Avenue & Shopping Center Driveway;
15. Balboa Avenue between Shopping Center Driveway & Mount Abernathy Avenue;
16. Balboa Avenue between Mount Abernathy Avenue & Cannington Drive;
17. Balboa Avenue between Cannington Drive & Charger Boulevard;
18. Balboa Avenue between Charger Boulevard & I-805 Southbound Ramps;
19. Balboa Avenue between I-805 Southbound & I-805 Northbound Ramps; and
20. Balboa Avenue between I-805 Northbound Ramps and Ruffner Street.

Intersections

The following 20 intersections are located within the project study area for transportation (note that intersection locations 19 and 20 do not exist today but are future intersections associated with the proposed project):

1. Genesee Avenue & Clairemont Mesa Boulevard (Signal);
2. Genesee Avenue & Bannock Avenue (Signal);
3. Genesee Avenue & Chateau Drive (Signal);
4. Genesee Avenue & Mount Herbert Avenue (Signal);
5. Genesee Avenue & Derrick Drive (Signal);
6. Mount Everest Boulevard & Mount Etna Drive (All-Way Stop Controlled);
7. Genesee Avenue & Mount Etna Drive (Signal);
8. Clairemont Drive & Balboa Avenue (Signal);
9. Mount Everest Boulevard & Balboa Avenue (Signal);
10. Genesee Avenue & Balboa Avenue (Signal);

11. Shopping Center Driveway & Balboa Avenue (Signal);
12. Mount Abernathy Avenue & Balboa Avenue (Signal);
13. Cannington Drive & Balboa Avenue (Signal);
14. Charger Boulevard & Balboa Avenue (Signal);
15. I-805 Southbound Ramps & Balboa Avenue (Signal);
16. I-805 Northbound Ramps & Balboa Avenue (Signal);
17. Genesee Avenue & Mount Alifan Drive (Signal);
18. Mount Etna Drive & Project Driveway (Side-Street Stop Controlled)[1];
19. Genesee Avenue & Project Driveway (Side-Street Stop Controlled)[1]; and
20. Balboa Avenue & Project Driveway (Side-Street Stop Controlled)[1].

2.4.1.3 Existing Traffic Conditions

Intersections

Table 2.4-1 displays intersection level of service and average vehicle delay results for the key study area intersections under Existing Conditions. Level of service calculation worksheets for Existing Conditions are provided in Appendix I. As shown in the table, all of the study area intersections are currently operating at acceptable LOS D or better during both the AM and PM peak hours, with the exception of the following four intersections:

1. Genesee Avenue & Clairemont Mesa Boulevard – LOS E during the PM peak hour, primarily due to the heavy volume in the southbound through direction;
8. Clairemont Drive & Balboa Avenue – LOS E during the PM peak hour, primarily due to the southbound left movement which experiences a particularly high delay compared to all other movements at the intersection;
9. Mount Everest Boulevard & Balboa Avenue – LOS E during the AM and PM peak hours, primarily due to the high delay from the northbound and southbound directions, each serviced by a single lane in the respective directions; and
10. Genesee Avenue & Balboa Avenue – LOS E during the PM peak hour primarily due to the heavy volumes on all approaches of the intersection.

[1] Driveway does not currently exist; would be developed as part of Access Option 1, 2, or 3.

Table 2.4-1
Peak Hour Intersection Level of Service – Existing Conditions

Intersection	Control	AM Peak Hour		PM Peak Hour	
		Avg. Delay (sec.)	LOS	Avg. Delay (sec.)	LOS
1. Genesee Avenue & Clairemont Mesa Boulevard	Signal	42.6	D	59.9	**E**
2. Genesee Avenue & Bannock Avenue	Signal	19.7	B	10.5	B
3. Genesee Avenue & Chateau Drive	Signal	11.0	B	4.7	A
4. Genesee Avenue & Mt Herbert Avenue	Signal	13.7	B	7.8	A
5. Genesee Avenue & Derrick Drive	Signal	16.9	B	50.9	D
6. Mt Everest Boulevard & Mt Etna Drive	AWSC	9.0	A	10.6	B
7. Genesee Avenue & Mt Etna Drive	Signal	20.1	C	24.5	C
8. Clairemont Drive & Balboa Avenue	Signal	37.7	D	60.1	**E**
9. Mt Everest Boulevard & Balboa Avenue	Signal	73.7	**E**	58.7	**E**
10. Genesee Avenue & Balboa Avenue	Signal	36.3	D	59.1	**E**
11. Shopping Center Driveway & Balboa Avenue	Signal	20.9	C	15.4	B
12. Mt Abernathy Avenue & Balboa Avenue	Signal	35.8	D	41.6	D
13. Cannington Drive & Balboa Avenue	Signal	10.6	B	24.0	C
14. Charger Boulevard & Balboa Avenue	Signal	43.4	D	33.3	C
15. I-805 Southbound Ramps & Balboa Avenue	Signal	9.5	A	7.5	A
16. I-805 Northbound Ramps & Balboa Avenue	Signal	8.8	A	9.1	A
17. Genesee Avenue & Mt Alifan Drive	Signal	47.6	D	50.5	D
18. Project Driveway & Mt Etna Drive	DNE	—	—	—	—

NOTES:
Bold letter indicates unacceptable LOS E or F.
AWSC = all-way stop controlled; SSSC = side-street stop controlled; DNE = does not exist

SOURCE: Chen Ryan 2019 (Appendix I-1)

Roadway Segments

Table 2.4-2 displays the LOS analysis results for key study area roadway segments under Existing Conditions. As shown in the table, all of the key study area roadway segments are currently operating at acceptable LOS D or better, with the exception of the following five roadway segments:

12. Balboa Avenue, between Clairemont Drive and Mount Everest Boulevard (LOS E);

Table 2.4-2
Roadway Segment Level of Service – Existing Conditions

Roadway	Segment	Functional Classification	Cross-Section	ADT	Capacity (LOS E)	V/C	LOS
Genesee Avenue	Between Appleton Street & Clairemont Mesa Boulevard	4-Lane Major Arterial	Raised Median	23,097	40,000	0.577	C
	Between Clairemont Mesa Boulevard & Bannock Avenue	4-Lane Major Arterial	Undivided	24,483	40,000	0.612	C
	Between Bannock Avenue & Chateau Drive	4-Lane Major Arterial	Raised Median	25,244	40,000	0.631	C
	Between Chateau Drive & Mt Herbert Avenue	4-Lane Major Arterial	Raised Median	24,958	40,000	0.624	C
	Between Mt Herbert Avenue & Derrick Drive	4-Lane Major Arterial	Raised Median	23,242	40,000	0.581	C
	Between Derrick Drive & Mt Etna Drive	6-Lane Major Arterial	Raised Median	25,645	50,000	0.513	B
	Between Mt Etna Drive & Balboa Avenue	5-Lane Major Arterial	Raised Median	27,743	45,000	0.617	C
	Between Balboa Avenue & Mt Alifan Drive	5-Lane Major Arterial	Raised Median	23,259	45,000	0.517	B
	Between Mt Alifan Drive & Genesee Court	4-Lane Major Arterial	Raised Median	23,742	40,000	0.594	C
Mt Everest Boulevard	Between Mt Etna Drive & Balboa Avenue	2-Lane Collector w/o CLTL	Undivided	4,206	8,000	0.526	C
Mt Etna Drive	Between Mt Everest Boulevard & Genesee Avenue	2-Lane Collector w/o CLTL	Undivided	4,090	8,000	0.511	C
Balboa Avenue	Between Clairemont Drive & Mt Everest Boulevard	4-Lane Major Arterial	Raised Median	35,014	40,000	0.875	**E**
	Between Mt Everest Boulevard & Genesee Avenue	4-Lane Major Arterial	Raised Median	32,421	40,000	0.811	D

Roadway	Segment	Functional Classification	Cross-Section	ADT	Capacity (LOS E)	V/C	LOS
	Between Genesee Avenue & Shopping Center Driveway	6-Lane Major Arterial	Raised Median	32,231	50,000	0.645	C
	Between Shopping Center Driveway & Mt Abernathy Avenue	6-Lane Major Arterial	Raised Median	35,984	50,000	0.720	C
	Between Mt Abernathy Avenue & Cannington Drive	6-Lane Major Arterial	Raised Median	47,147	50,000	0.943	**E**
	Between Cannington Drive & Charger Boulevard	6-Lane Major Arterial	Raised Median	49,421	50,000	0.988	**E**
	Between Charger Boulevard & I-805 Southbound Ramps	6-Lane Major Arterial	Raised Median	61,846	50,000	1.237	**F**
	Between I-805 Southbound Ramps & I-805 Northbound Ramps*	8-Lane Prime Arterial	Raised Median	49,153	80,000	0.614	B
	Between I-805 Northbound Ramps & Ruffner Street	6-Lane Major Arterial	Raised Median	51,228	50,000	1.025	**F**

NOTES:

Bold letter indicates unacceptable LOS E or F.

ADT = average daily traffic; V/C = volume-to-capacity ratio; LOS = level of service; Ln = lane; CLTL = continuous left-turn lane

* The Balboa Ave segment between the southbound and northbound I-805 ramps is classified as a 6-lane major according to the CMCP; however, the actual roadway cross-section includes eight lanes (two of which are auxiliary ramp lanes).

SOURCE: Chen Ryan 2019 (Appendix I-1)

16. Balboa Avenue, between Mount Abernathy Avenue and Cannington Drive (LOS E);
17. Balboa Avenue, between Cannington Drive and Charger Boulevard (LOS E); and
18. Balboa Avenue, between Charger Boulevard and I-805 Southbound Ramps (LOS F).

Ramp Meters

A ramp metering analysis was conducted to calculate delays and queues at the study area freeway on-ramps. Within the project study area, the I-805 northbound on-ramp at Balboa Avenue (study intersection no. 16) and the I-805 southbound on-ramp at Balboa Avenue (study intersection no. 15) have activated ramp meters. **Table 2.4-3** summarizes the freeway ramp metering analysis results under Existing Conditions. As shown in the table, the anticipated peak hour demand does not exceed the average meter rate at either of the study ramp meter locations.

Table 2.4-3
Ramp Metering Analysis – Existing Conditions

On-Ramp	# of Lanes SOV	# of Lanes HOV	Peak Hour	Demand[a] (veh/hr) per lane	Meter Rate[b] (veh/hr) per lane	Excess Demand[c] (veh/hr) per lane	Delay[d] (min)	Queue[e] (ft)	Storage Length (ft)	Excess Queue (ft)
I-805 SB On-Ramp @ Balboa Ave EB	1	1	PM	384	423	0	0	0	1,000	0
I-805 NB Ramp @ Balboa Ave EB	1	1	AM	314	511	0	0	0	410	0

NOTES:

SOV = single-occupancy vehicle; HOV = high-occupancy vehicle

a Demand is the peak hour demand expected to use the on-ramp.

b Meter Rate is the peak hour capacity expected to be processed through the ramp meter. This value was obtained from Caltrans.

c Excess Demand = (Demand) – (Meter Rate) or zero, whichever is greater.

d Delay = (Excess Demand / Meter Rate) X 60 min/hr.

e Queue = (Excess Demand) X 29 ft/veh.

SOURCE: Chen Ryan 2019 (Appendix I-1)

Table 2.4-3 Ramp Metering Analysis – Existing Conditions

				SOV							HOV						
On-Ramp	# of Lanes SOV	# of Lanes HOV	Peak Hour	Demand[1] (veh/hr) per lane	Meter Rate[2] (veh/hr) per lane	Excess Demand[3] (veh/hr) per lane	Max Obs. Delay[4] (min)	Max Obs Queue[5] (ft)	Storage Length (ft)	Excess Queue (ft)	Demand[1] (veh/hr) per lane	Meter Rate[2] (veh/hr) per lane	Excess Demand[3] (veh/hr) per lane	Max Obs. Delay[4] (min))	Max Obs Queue[5] (ft)	Storage Length (ft)	Excess Queue (ft)
I-805 SB On-Ramp @ Balboa Ave EB	1	1	PM	384	347	37	6.4	186	1,000	0	96	347	0	0	0	1,000	0
I-805 NB Ramp @ Balboa Ave EB	1	1	AM	314	451	0	0	0	410	0	78	451	0	0	0	410	0

SOV = Single Occupancy Vehicle; HOV = High Occupancy Vehicle.

[1] Demand is the peak hour demand expected to use the on-ramp.

[2] Meter Rate is the peak hour capacity expected to be processed through the ramp meter. This value was obtained from Caltrans.

[3] Excess Demand = (Demand) – (Meter Rate) or zero, whichever is greater.

[4] Delay = (Excess Demand / Meter Rate) X 60 min/hr.

[5] Queue = (Excess Demand) X 29 ft/veh.

SOURCE: Chen Ryan 2019 (Appendix I-1)

2.4.1.4 Existing Pedestrian Conditions

Sidewalks are provided on both sides of Mount Etna Drive along the project frontage. The sidewalk along Mount Etna Drive on the north side fronts a commercial plaza across from the project site. Heading west, the sidewalk then continues to the nearby residential neighborhoods. Crosswalks are present on all four legs of the Genesee Avenue and Mount Etna Drive intersection less than 150 feet northeast from the project site.

Mount Etna Drive provides east/west connectivity from the project site to nearby residential neighborhoods, as well as to nearby commercial shopping centers such as the Genesee Plaza Shopping Center and the Liberty Park Plaza shopping center. A pedestrian-friendly speed limit of 15 mph is posted at the entrance to the residential neighborhood accompanied by road speed bumps that end at the Mount Everest and Mount Etna Drive intersection.

All streets immediately surrounding the project site include sidewalks. All signalized intersections within the project study area include striped crosswalks, pedestrian signal heads, and American with Disabilities Act (ADA)-compliant ramps, where crossings are allowed, with the exception of the following:

Pedestrian crossing is not allowed at the following locations:

- The south leg of Genesee Avenue & Chateau Drive
- The west leg of Cannington Drive and Balboa Avenue
- The east leg of Charger Boulevard & Balboa Avenue

ADA-compliant ramps are not present at the following locations:

- The southwest corner of the Genesee Avenue & Derrick Drive intersection
- The southwest corner of the Genesee Avenue & Mount Alifan Drive intersection

The north leg of the I-805 southbound Ramps and Balboa Avenue intersection does not have ADA-compliant ramps at either crossing point. The south leg of this intersection as well as the two loop ramps currently lack pedestrian signal heads and ADA-compliant ramps.

The south leg of the I-805 northbound Ramps and Balboa Avenue intersection does not have ADA-compliant ramps at either crossing point. The north leg of this intersection as well as the two loop ramps currently lack pedestrian signal heads and ADA-compliant ramps.

2.4.1.5 Existing Bicycle Conditions

There are currently no bicycle facilities directly accessing the project site on Mount Etna Drive; however, Class II bike lanes are present on both sides of Genesee Avenue and Balboa Avenue. The southbound Class II bike lane on Genesee Avenue to the east of the project site is painted green for high visibility as the lane approaches the Genesee Avenue and Balboa Avenue intersection and is located adjacent to a right-turn pocket.

2.4.1.6 Existing Transit Conditions

The project site is not directly served by transit. However, San Diego MTS Bus Route #27 and #41, described below, have multiple stops within a mile of the project site. The transit lines are illustrated in **Figure 2.4-2**.

MTS Bus Route #27 connects Pacific Beach to the west and the Kearny Mesa Transit Center to the east. The Balboa Avenue and Genesee Avenue bus stop is the closest bus stop to the project site within 400 feet. MTS Bus Route #27 runs every 30 minutes during peak periods and hourly during off-peak period on weekdays and hourly on Saturdays. MTS Bus Route #27 does not operate on Sundays. MTS Bus Route #27 runs from approximately from 5:30 AM to 10:00 PM on weekdays and 6:00 AM and 8:30 PM on Saturdays.

MTS Bus Route #41 connects the University of California San Diego (UCSD)/University Towne Centre (UTC) to the north and Fashion Valley to the south. The Genesee Avenue and Mount Etna Drive bus stop is the closest bus stop to the project site within 400 feet. MTS Bus Route #41 runs every 15 minutes during peak periods and every 30 minutes during off-peak period on weekdays. When UCSD is in session, MTS Bus Route #41 runs every 6 minutes between 6:47 AM and 9:32 AM towards UCSD/UTC and between 2:59 PM and 5:29 PM towards Fashion Valley. MTS Bus Route #41 also runs every 30 minutes during peak periods and hourly during off-peak periods on the weekends. MTS Bus Route #41 runs from approximately 5:20 AM and 11:40 PM on weekdays, 6:30 AM and 10:00 PM on Sundays, and 6:00 AM and 10:30 PM on Saturdays.

2.4.2 Regulatory Setting

2.4.2.1 State

California Department of Transportation

The California Department of Transportation (Caltrans) is the primary state agency responsible for transportation issues. One of its duties is the construction and maintenance of the state highway system. Caltrans has established standards for street traffic flow and has developed procedures to determine if

intersections require improvements. For projects that may physically affect facilities under its administration, Caltrans requires encroachment permits before any construction work may be undertaken. For projects that would not physically affect facilities but may influence traffic flow and levels of services at such facilities, Caltrans may recommend measures to mitigate the traffic impacts of such projects.

Senate Bill 743

On September 27, 2013, Senate Bill (SB) 743 was signed into law. SB 743 started a process that could fundamentally change transportation impact analysis as part of California Environmental Quality Act (CEQA) compliance. These changes include the elimination of auto delay, LOS, and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant impacts in many parts of California (if not statewide). SB 743 required the Governor's Office of Planning and Research (OPR) to propose revisions to the CEQA Guidelines establishing new criteria to "promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses." (Public Resources Code Section 21099(b)(1).)

The latest CEQA Guidelines Section 15064.3, subdivision (b) was adopted in December 2018 by the California Natural Resources Agency. These revisions to the CEQA Guidelines criteria for determining the significance of transportation impacts are primarily focused on projects within transit priority areas (TPAs), and shifts the focus from driver delay to reduction of greenhouse gas emissions, creation of multimodal networks, and promotion of a mix of land uses (which in turn reduces vehicle trips). Vehicle miles traveled (VMT) is a measure of the total number of miles driven to or from a development and is sometimes expressed as an average per trip or per person.

The adopted guidance provides that a lead agency may elect to be governed by the provisions of this section immediately. Beginning on July 1, 2020, the provisions of this section shall apply statewide. The City is currently engaged in this process and has not yet formally adopted its updated transportation significance thresholds or its updated transportation impact analysis procedures. Since the regulations of SB 743 have not been finalized or adopted by the City, automobile delay remains the measure used to determine the significance of a traffic impact. However, a VMT analysis was conducted for the proposed project, and is summarized in the discussion of project impacts for informational purposes.

2.4.2.2 Regional

San Diego Forward: The Regional Plan

The San Diego Association of Governments (SANDAG) is the regional authority that creates regional specific documents to provide guidance to local agencies, as SANDAG does not have land use authority. SANDAG's San Diego Forward: The Regional Plan (Regional Plan) was adopted by the SANDAG Board of Directors on October 9, 2015 (SANDAG 2015). The Regional Plan combines two of the region's existing planning documents: the Regional Comprehensive Plan (RCP) for the San Diego Region and the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The RCP, adopted in 2004, laid out key principles for managing the region's growth while preserving natural resources and limiting urban sprawl. The plan covered eight policy areas, including urban form, transportation, housing, health environment, economic prosperity, public facilities, our borders, and social equity. These policy areas were addressed in the 2050 RTP/SCS and are now fully integrated into the Regional Plan. The project site is located within a planned (2035) TPA identified on the TPA map contained in the SANDAG's San Diego Forward: The Regional Plan (City of San Diego 2019).

2.4.2.3 Local

San Diego County General Plan

The San Diego County General Plan Mobility Element provides a framework for a balanced, multi-modal transportation system within the unincorporated areas of the County of San Diego. The Mobility Element includes a description of the County's transportation network and the goals and policies that address safety, efficiency, maintenance, and management of the transportation network.

City of San Diego General Plan

The Mobility Element of the City of San Diego General Plan defines the policies regarding traffic flow and transportation facility design. The purpose of the Mobility Element is "to improve mobility through development of a balanced, multi-modal transportation network." The main goals of the Mobility Element pertain to walkable communities, transit first, street and freeway system, intelligent transportation systems (ITS), Transportation Demand Management (TDM), bicycling, parking management, airports, passenger rail, goods movement/freight, and regional transportation coordination and financing

Clairemont Mesa Community Plan

The primary goal for transportation as stated in the CMCP is to "[P]rovide a safe and efficient transportation system that maximizes access to community activity centers and to destinations within the City, minimizing adverse environmental effects" (CMCP page 12).

2.4.3 Analysis of Project Effects and Determination as to Significance

The following thresholds have been established by the City to determine significance under CEQA related to traffic impacts:

1. If any intersection or roadway segment affected by a project would operate at LOS E or F under either direct or cumulative conditions, the impact would be significant if the project exceeds the thresholds shown in **Table 2.4-4**;
2. At any ramp meter location with delays above 15 minutes, the impact would be significant if the project exceeds the thresholds shown in Table 2.4-4;
3. If a project would add a substantial amount of traffic as shown in Table 2.4-4 to a congested freeway segment, interchange, or ramp, the impact may be significant;
4. If a project would increase traffic hazards to motor vehicles, bicyclists, or pedestrians due to proposed non-standard design features (e.g., poor sight distance, proposed driveway onto an access-restricted roadway), the impact would be significant;
5. If a project would result in the construction of a roadway which is inconsistent with the General Plan and/or a community plan, the impact would be significant if the proposed roadway would not properly align with other existing or planned roadways;
6. If a project would result in a substantial restriction in access to publicly or privately owned land, the impact would be significant;

Table 2.4-4
City of San Diego Traffic Thresholds

	Allowable Change Due to Project Impact**					
	Freeways		Roadway Segments		Intersections	Ramp Metering
Level of Service with Project*	V/C	Speed (mph)	V/C	Speed (mph)	Delay (sec.)	Delay (min.)
E (or ramp meter delays above 15 min.)	0.010	1.0	0.02	1.0	2.0	2.0
F (or ramp meter delays above 15 min.)	0.005	0.5	0.01	0.5	1.0	1.09

* All level of service (LOS) measurements are based upon HCM procedures for peak-hour conditions. However, vehicle to capacity (V/C) ratios for roadway segments may be estimated on an ADT/24-hour traffic volume basis (using Table 2.1 or a similar LOS chart for each jurisdiction). The acceptable LOS for freeways, roadways, and intersections is generally "D" ("C" for undeveloped or not densely developed locations per jurisdiction definitions). For metered freeway ramps, LOS does not apply. However, ramp meter delays above 15 minutes are considered excessive.

** If a Proposed Project's traffic causes the values shown in the table to be exceeded, the impacts are determined to be significant. These impact changes may be measured from appropriate computer programs or expanded manual spreadsheets. The project applicant shall then identify feasible mitigation (within the Traffic Impact Study report) that would maintain the traffic facility at an acceptable LOS. If the LOS with the Proposed Project becomes unacceptable (see above * note), or if the project adds a significant amount of peak-hour trips to cause any traffic queues to exceed on- or off-ramp storage capacities, the project applicant shall be responsible for mitigating significant impact changes.

In addition, the following criterion from Appendix G of the CEQA Guidelines was used for the evaluation of VMT impacts:

- Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3 subdivision (b)?

However, as stated above in the Section 2.4.2, Regulatory Setting, the City has not yet adopted VMT thresholds and, therefore, this the evaluation of VMT impacts is provided for informational purposes only.

2.4.3.1 Traffic Generation and Existing Capacity

Issue 1: Would the project result in traffic generation that would cause an intersection, roadway segment, freeway segment, interchange or ramp to operate at LOS E or F under either direct or cumulative conditions and exceed the significance thresholds detailed in Table 2.4-4?

The analysis of impacts under Issue 1 addresses Significance Determination Thresholds 1, 2, and 3 as detailed in Section 2.4.3, above. The analysis includes three traffic condition scenarios: Existing Plus Project; Near-Term Year 2021 Plus Project; and Cumulative Year 2050 Plus Project, and includes an evaluation of each of the three access options. It should be noted that freeway segments did not warrant evaluation because the proposed project would contribute less than 150 peak hour trips to nearby freeways. In addition, it should be noted that no

trips were assigned to the proposed ground floor non-residential space, as the space would serve the future residents only, and would not generate additional trips. The analysis is for the proposed Community Plan Amendment (CPA) and rezone of the project site. The site demolition and preparation phase of the proposed project would not produce permanent traffic requiring analysis under the City Significance Determination Thresholds.

Information used in this section is from the Transportation Impact Study (TIS) (Appendix I-1), the TIS Addendum (Appendix I-2), ~~and~~ the VMT Addendum (Appendix I-3), and the revised traffic analysis tables and Synchro worksheets (Appendix I-4), prepared by Chen Ryan for the proposed project (Chen Ryan 2019), which are all included as Appendix I of this EIR. At the time the TIS was prepared, the future residential project consisted of 448 affordable housing units with site access provided via one driveway on Mount Etna Drive. The future project was subsequently limited to 404 affordable dwelling units and three site access options: (1) one driveway on Mount Etna Drive; (2) two driveways: one on Mount Etna Drive and one on Genesee Avenue; and (3) three driveways: one on Mount Etna Drive, one on Genesee Avenue, and one on Balboa Avenue). For these reasons, the TIS Addendum was prepared. As such, the transportation and traffic analysis and impact evaluation summarized below is based on the results described in the TIS Addendum contained in Appendix I-2 ~~and not~~ rather than the TIS contained in Appendix I-1.

Impact Analysis

Trip Generation, Distribution, and Assignment

The proposed project trip generation estimates were derived utilizing the trip generation rates outlined in Table 1 of the *City of San Diego Land Development Code – Trip Generation Manual 2003*. Additionally, trip reductions from the City's Traffic Impact Study Manual were applied to the trip generation estimates to account for its location in a TPA with high-frequency transit service on Genesee Avenue and planned high frequency bus service along Balboa Avenue being phased in by 2020, per the Smart Growth Map using information from the RTP, with planned rapid transit scheduled for ~~by~~ 2035. Once funding for these additional transit services is secured by MTS, two high-frequency bus routes would intersect in the project area to support TPA identification. The expanded transit service along Balboa Avenue would also provide connections to the trolley station being constructed at Balboa Avenue and Morena Boulevard, planned to be operational by 2021. Consequently, the following trip reductions were applied to the project's trip generation estimates to take credit for future residents using transit in lieu of driving during the lifespan of the project:

- Daily trips = 5 percent
- AM Peak Hour trips = 9 percent
- PM Peak Hour trips = 6 percent

Taking into account these trip reductions, the proposed project is anticipated to generate a total of 2,018 daily trips, including 138 AM peak hour trips and 169 PM peak hour trips. The trip distribution for the proposed project was developed based on a SANDAG Series 13 Transportation Forecast Select Zone Assignment. This model was developed and is being used for the on-going CMCP Update. Additionally, the project's traffic analysis zone (TAZ) land use was updated to include the proposed land use.

Based on the assumed project trip distribution and the three access options, daily, AM peak hour, and PM peak hour estimates were added onto the project driveway(s), as well as the roadways and intersections immediately adjacent to the project driveway(s).

Existing plus Project

The Existing plus Project traffic scenario represents an analysis of existing traffic conditions with the addition of trips generated by the proposed project. Under this scenario, the proposed project's traffic volumes were added to the existing traffic volumes.

Table 2.4-5 displays intersection level of service and average vehicle delay results for the key study area intersections under Existing plus Project conditions with all three access options. **Table 2.4-6** displays the level of service and volume-to-capacity (v/c) analysis results for key study area roadway segments under Existing plus Project conditions. **Table<u>s</u> 2.4-7<u>A and 2.4-7B</u>** summarize the ramp metering analysis for Existing plus Project conditions at the two study intersections (no. 15 and no. 16) with ~~activated~~ <u>most restrictive</u> ramp meters <u>using SOV and HOV data</u>. Level of service calculation worksheets and ramp meter analysis details for Existing plus Project conditions are provided in Appendix I.

Table 2.4-5
Peak Hour Intersection Level of Service – Existing plus Project

Intersection	Control	No Project				With Access Option 1						With Access Option 2						With Access Option 3					
		Avg. Delay (sec) AM	LOS AM	Avg. Delay (sec) APM	LOS PM	Avg. Delay (sec) AM	LOS AM	Avg. Delay (sec) APM	LOS PM	Change in Delay AM/PM	Sig Impact?	Avg. Delay (sec) AM	LOS AM	Avg. Delay (sec) APM	LOS PM	Change in Delay AM/PM	Sig Impact?	Avg. Delay (sec) AM	LOS AM	Avg. Delay (sec) APM	LOS PM	Change in Delay AM/PM	Sig Impact?
1: Genesee Ave & Clairemont Mesa Blvd	Signal	42.6	D	59.9	**E**	42.90	D	61.80	**E**			42.90	D	61.80	**E**			42.90	D	61.80	**E**		
2: Genesee Ave & Bannock Ave	Signal	19.7	B	10.5	B	19.80	B	10.50	B			19.80	B	10.50	B			19.80	B	10.50	B		
3: Genesee Ave & Chateau Dr	Signal	11.0	B	4.7	A	11.20	B	4.70	A			11.20	B	4.70	A			11.20	B	4.70	A		
4: Mt Herbert Ave & Genesee Ave	Signal	13.7	B	7.8	A	13.70	B	7.70	A			13.70	B	7.70	A			13.70	B	7.70	A		
5: Genesee Ave & Derrick Dr	Signal	16.9	B	50.9	D	16.80	B	51.80	D			16.80	B	51.80	D			16.80	B	51.80	D		
6: Mt Everest Blvd & Mt Etna Dr	AWSC	9.0	A	10.6	B	9.20	A	11.00	B	0.2/0.4	N/N	9.10	A	10.90	B	0.1/0.3	N/N	1.20	A	2.30	A	-7.8/-8.3	N/N
7: Genesee Ave & Mt Etna Dr	Signal	20.1	C	24.5	C	22.50	C	25.40	C	2.4/0.9	N/N	21.20	C	25.10	C	1.1/0.6	N/N	21.10	C	25.00	C	1.0/0.5	N/N
8: Clairemont Dr & Balboa Ave	Signal	37.7	D	60.1	**E**	38.00	D	61.70	**E**			38.00	D	61.70	**E**			38.00	D	61.70	**E**		
9: Balboa Ave & Mt Everest Blvd	Signal	73.7	**E**	58.7	**E**	80.10	**F**	59.50	**E**	6.4/0.8	**Y**/N	75.00	**E**	59.20	**E**	1.3/0.5	N/N	78.70	**E**	62.70	**E**	5.0/4.0	**Y/Y**
10: Genesee Ave & Balboa Ave	Signal	36.3	D	59.1	**E**	36.90	D	59.40	**E**	0.6/0.3	N/N	37.00	D	59.80	**E**	0.7/0.7	N/N	37.80	D	63.20	**E**	1.5/4.1	N/**Y**
11: Balboa Ave & Shopping Center Drwy	Signal	20.9	C	15.4	B	21.10	C	15.20	B			21.10	C	15.20	B			21.10	C	15.20	B		
12: Mt Alifan Dr/Mt Abernathy Ave & Balboa Ave	Signal	35.8	D	41.6	D	36.90	D	41.80	D			36.90	D	41.80	D			36.90	D	41.80	D		
13: Mt Albertine Ave/Cannington Dr & Balboa Ave	Signal	10.6	B	24.0	C	10.50	B	25.60	C			10.50	B	25.60	C			10.50	B	25.60	C		
14: Eckstrom Ave/Charger Blvd & Balboa Ave	Signal	43.4	D	33.3	C	44.60	D	33.30	C			44.60	D	33.30	C			44.60	D	33.30	C		
15: I-805 SB Ramps & Balboa Ave	Signal	9.5	A	7.5	A	10.60	B	8.60	A			10.60	B	8.60	A			10.60	B	8.60	A		
16: I-805 NB Ramps & Balboa Ave	Signal	8.8	A	9.1	A	9.80	A	10.10	B			9.80	A	10.10	B			9.80	A	10.10	B		
17: Genesee Ave & Mt Alifan Dr	Signal	47.6	D	50.5	D	47.60	D	50.50	D			47.60	D	50.50	D			47.60	D	50.50	D		
18: Project Driveway #1 & Mt Etna Dr	SSSC	DNE	DNE	DNE	DNE	9.90	A	10.50	B	9.9/10.5	N/N	9.50	A	10.10	B	9.5/10.1	N/N	9.30	A	9.70	A	9.3/9.7	N/N
19: Genesee Ave & Project Driveway #2	SSSC	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	11.90	B	17.30	C	11.9/17.3	N/N	11.70	B	16.80	C	11.7/16.8	N/N
20: Balboa Ave & Project Driveway #3	SSSC	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	13.70	B	16.80	C	13.7/16.8	N/N

NOTES:
Bold letter indicates unacceptable LOS E or F and significant impact.
AWSC = all-way stop controlled; SSSC = side-street stop controlled; DNE = does not exist.
Delay and Significance Analysis is provided from the Addendum to the TIA contained in Appendix I-2
SOURCE: Chen Ryan 2019

Table 2.4-6
Roadway Segment Level of Service – Existing plus Project

				No Project			With Access Option 1					With Access Option 2					With Access Option 3				
Roadway	Segment	Cross-Section	Capacity (LOS E)	ADT	V/C	LOS	ADT	V/C	LOS	Change	Sig Impact?	ADT	V/C	LOS	Change	Sig Impact?	ADT	V/C	LOS	Change	Sig Impact?
Genesee Avenue	Appleton Street & Clairemont Mesa Boulevard	4M	40,000	23,097	0.577	C	23,379	0.584	C			23,379	0.584	C			23,379	0.584	C		
Genesee Avenue	Clairemont Mesa Boulevard & Bannock Avenue	4M	40,000	24,483	0.612	C	24,847	0.621	C			24,847	0.621	C			24,847	0.621	C		
Genesee Avenue	Bannock Avenue & Chateau Drive	4M	40,000	25,244	0.631	C	25,608	0.640	C			25,608	0.640	C			25,608	0.640	C		
Genesee Avenue	Chateau Drive & Mount Herbert Avenue	4M	40,000	24,958	0.624	C	25,342	0.634	C			25,342	0.634	C			25,342	0.634	C		
Genesee Avenue	Mount Herbert Avenue & Derrick Drive	4M	40,000	23,242	0.581	C	23,626	0.591	C			23,626	0.591	C			23,626	0.591	C		
Genesee Avenue	Derrick Drive & Mount Etna Drive	6M	50,000	25,645	0.513	B	26,189	0.524	B			26,189	0.524	B			26,189	0.524	B		
Genesee Avenue	Mount Etna Drive & Balboa Avenue	5M	45,000	27,743	0.617	C	28,691	0.638	C	0.021	N	28,911	0.642	C	0.025	N	28,573	0.635	C	0.018	N
Genesee Avenue	Balboa Avenue & Mount Alifan Drive	5M	45,000	23,259	0.517	B	23,541	0.523	B			23,541	0.523	B			23,540	0.523	B		
Genesee Avenue	Mount Alifan Drive & Genesee Court	4M	40,000	23,742	0.594	C	23,984	0.600	C			23,984	0.600	C			23,984	0.600	C		
Mount Everest Boulevard	Mount Etna Drive & Balboa Avenue	2C	8,000	4,206	0.526	C	4,630	0.579	C	0.053	N	4,528	0.566	C	0.040	N	4,482	0.560	C	0.034	N
Mount Etna Drive	Mount Everest Boulevard & Genesee Avenue	2C	8,000	4,090	0.511	C	6,108	0.764	D	0.253	N	5,286	0.661	D	0.150	N	5,129	0.641	D	0.130	N
Balboa Avenue	Clairemont Drive & Mount Everest Boulevard	4M	40,000	35,014	0.875	**E**	35,398	0.885	**E**			35,398	0.885	**E**			35,398	0.885	**E**		
Balboa Avenue	Mount Everest Boulevard & Genesee Avenue	4M	40,000	32,421	0.811	D	32,421	0.811	D	0.000	N	32,523	0.813	D	0.002	N	32,643	0.816	D	0.005	N
Balboa Avenue	Genesee Avenue & Shopping Center Driveway	6M	50,000	32,231	0.645	C	32,897	0.658	C			32,897	0.658	C			32,897	0.658	C		
Balboa Avenue	Shopping Center Driveway & Mount Abernathy Avenue	6M	50,000	35,984	0.720	C	36,650	0.733	C			36,650	0.733	C			36,650	0.733	C		
Balboa Avenue	Mount Abernathy Avenue & Cannington Drive	6M	50,000	47,147	0.943	**E**	47,793	0.956	**E**			47,793	0.956	**E**			47,793	0.956	**E**		
Balboa Avenue	Cannington Drive & Charger Boulevard	6M	50,000	49,421	0.988	**E**	50,067	1.001	**F**			50,067	1.001	**F**			50,067	1.001	**F**		
Balboa Avenue	Charger Boulevard & I-805 Southbound Ramps	6M	50,000	61,846	1.237	**F**	62,492	1.250	**F**			62,492	1.250	**F**			62,492	1.250	**F**		
Balboa Avenue	I-805 Southbound & I-805 Northbound Ramps	8P	80,000	49,153	0.614	B	49,638	0.620	B			49,638	0.620	B			49,638	0.620	B		
Balboa Avenue	I-805 Northbound Ramps and Ruffner Street	6M	50,000	51,228	1.025	**F**	51,550	1.031	**F**			51,550	1.031	**F**			51,550	1.031	**F**		

NOTES:
Bold letter indicates unacceptable LOS E or F. ADT = Average Daily Traffic.
V/C = volume-to-capacity ratio; LOS = level of service
Delay and Significance Analysis is provided from the Addendum to the TIA contained in Appendix I-2
SOURCE: Chen Ryan 2019 (Appendix I-4)

Table 2.4-7
Ramp Metering Analysis – Existing plus Project

On-Ramp	# of Lanes SOV	# of Lanes HOV	Peak Hour	Demand[a] (veh/hr) per lane	Meter Rate[b] (veh/hr) per lane	Excess Demand[c] (veh/hr) per lane	Delay[d] (min)	Queue[e] (ft)	Storage Length (ft)	Excess Queue (ft)	Delay w/o Project (min)	Δ Delay (min)	S?
I-805 SB On-Ramp @ Balboa Ave EB	1	1	PM	395	423	0	0	0	1,000	0	0	0.0	No
I-805 NB Ramp @ Balboa Ave EB	1	1	AM	316	511	0	0	0	410	0	0	0.0	No

NOTES:

SOV = single-occupancy vehicle; HOV = high-occupancy vehicle

Based upon field observation it is estimated that 20% of the vehicles at these ramp meters use the HOV lane when available. Since the majority of trips existing the school during the PM Peak hour would be parents picking up students, it is assumed that 90% of the Proposed Project trips during the PM peak hours would use the HOV lane.

[a] Demand is the peak hour demand expected to use the on-ramp.

[b] Meter Rate is the peak hour capacity expected to be processed through the ramp meter. This value was obtained from Caltrans.

[c] Excess Demand = (Demand) – (Meter Rate) or zero, whichever is greater.

[d] Delay = (Excess Demand / Meter Rate) X 60 min/hr.

[e] Queue = (Excess Demand) X 29 ft/veh.

SOURCE: Chen Ryan 2019 (Appendix I-1)

Table 2.4-7A Ramp Metering Analysis – Existing Plus Project Conditions (SOV)

On-Ramp	# of Lanes SOV	# of Lanes HOV	Peak Hour	Demand[1] (veh/hr) per lane	Meter Rate[2] (veh/hr) per lane	Excess Demand[3] (veh/hr) per lane	Max Obs. Delay[4] (min)	Max Obs Queue[5] (ft)	Storage Length (ft)	Excess Queue (ft)	Delay w/o Project (min)	**Δ Delay (min)**	S?
I-805 SB On-Ramp @ Balboa Ave EB	1	1	PM	390	347	43	7.4	215	1,000	0	6.4	1.0	No
I-805 NB Ramp @ Balboa Ave EB	1	1	AM	315	451	0	0	0	410	0	0	0.0	No

SOV = Single Occupancy Vehicle; HOV = High Occupancy Vehicle.
[1] Demand is the peak hour demand expected to use the on-ramp.
[2] Meter Rate is the peak hour capacity expected to be processed through the ramp meter. This value was obtained from Caltrans.
[3] Excess Demand = (Demand) – (Meter Rate) or zero, whichever is greater.
[4] Delay = (Excess Demand / Meter Rate) X 60 min/hr.
[5] Queue = (Excess Demand) X 29 ft/veh.
SOURCE: Chen Ryan 2019 (Appendix I-1)

Table 2.4-7B Ramp Metering Analysis – Existing Plus Project Conditions (HOV)

On-Ramp	# of Lanes SOV	# of Lanes HOV	Peak Hour	Demand[1] (veh/hr) per lane	Meter Rate[2] (veh/hr) per lane	Excess Demand[3] (veh/hr) per lane	Max Obs. Delay[4] (min)	Max Obs Queue[5] (ft)	Storage Length (ft)	Excess Queue (ft)	Delay w/o Project (min)	**Δ Delay** (min)	S?
I-805 SB On-Ramp @ Balboa Ave EB	1	1	PM	98	347	0	0	0	1,000	0	0	0.0	No
I-805 NB Ramp @ Balboa Ave EB	1	1	AM	79	451	0	0	0	410	0	0	0.0	No

SOV = Single Occupancy Vehicle; HOV = High Occupancy Vehicle.
[1] Demand is the peak hour demand expected to use the on-ramp.
[2] Meter Rate is the peak hour capacity expected to be processed through the ramp meter. This value was obtained from Caltrans.
[3] Excess Demand = (Demand) – (Meter Rate) or zero, whichever is greater.
[4] Delay = (Excess Demand / Meter Rate) X 60 min/hr.
[5] Queue = (Excess Demand) X 29 ft/veh.
SOURCE: Chen Ryan 2019 (Appendix I-1)

Intersections – Access Option 1

As shown in Table 2.4-5, all of the study area intersections would operate at acceptable LOS D or better during both the AM and PM peak hours with Access Option 1 (one driveway on Mount Etna Drive), with the exception of the following four intersections:

1. Genesee Avenue & Clairemont Mesa Boulevard – LOS E during the PM peak hour;
8. Clairemont Drive & Balboa Avenue – LOS E during the PM peak hour;
9. Mount Everest Boulevard & Balboa Avenue – LOS F during the AM peak hour and LOS E during the PM peak hour; and
10. Genesee Avenue & Balboa Avenue – LOS E during the PM peak.

Based on the City's Significance Determination Thresholds, outlined above in Table 2.4-4, the traffic generated by Access Option 1 would result in a significant direct impact at the following study intersection **(Impact TRA-1)**:

9. Mount Everest Boulevard & Balboa Avenue

Intersections – Access Option 2

For Access Option 2 (two driveways: one full-access stop-controlled driveway on Mount Etna Drive and one right-turn-in, right-turn-out only stop-controlled driveway on Genesee Avenue), the same four intersections identified above for Access Option 1 would operate at an unacceptable LOS (i.e., LOS E or LOS F) during one or more of the peak hours. However, access Option 2 would not result in any significant intersection impacts

Intersections – Access Option 3

For Access Option 3 (three driveways, one full-access stop-controlled driveway on Mount Etna Drive, one right-turn-in, right-turn-out only stop-controlled driveway on Genesee Avenue, and one right-turn-in, right-turn-out only stop-controlled driveway on Balboa Avenue), the same four intersections identified above for Access Option 1 would operate at an unacceptable LOS (i.e., LOS E or LOS F) during one or more of the peak hours. Access Option 3 would result in two significant direct intersection impacts **(Impact TRA-1)**:

9. Mount Everest Boulevard & Balboa Avenue
10. Genesee Avenue & Balboa Avenue

Roadway Segments

The roadway segment analysis results are the same for all three access options. As shown in Table 2.4-6, all of the key study area roadway segments would

operate at acceptable LOS D or better with all access options, with the exception of the following five roadway segments along Balboa Avenue:

12. Balboa Avenue, between Clairemont Drive and Mount Everest Boulevard (LOS E);
16. Balboa Avenue, between Mount Abernathy Avenue and Cannington Drive (LOS E);
17. Balboa Avenue, between Cannington Drive and Charger Boulevard (LOS F);
18. Balboa Avenue, between Charger Boulevard and I-805 Southbound Ramps (LOS F); and
20. Balboa Avenue, between I-805 Northbound Ramps and Ruffner Street (LOS F).

Of the five roadway segments projected to operate at substandard LOS E or F under Existing plus Project conditions, the two discussed below could potentially result in a significant impact based on the Significance Determination Thresholds outlined in Table 2.4-4. Daily roadway LOS is typically used only at the planning level and does not necessarily indicate true roadway operations. Therefore, to determine if the identified roadway segments operate at acceptable levels during peak times (worst case), peak hour HCM arterial analyses and peak hour intersection analyses were conducted to better understand the actual travel flow along the roadways. According to this methodology, if peak hour arterial LOS and the LOS at the intersections at either end of the roadway segment would operate at LOS D or better, and the roadway segment is built to its ultimate classification, then the impact would be considered to be less than significant, since the actual travel flow along the segment is consider to be acceptable.

17. Balboa Avenue, between Cannington Drive and Charger Boulevard.

    The proposed project would add 646 daily trips, resulting in an increase of 0.013 in V/C ratio. The arterial level of service analysis identifies this roadway segment to operate at LOS E and LOS D in the eastbound and westbound directions, respectively, during the AM peak hour, and LOS F and LOS D in the eastbound and westbound directions, respectively, during the PM peak hour. The intersections of Mount Albertine Avenue/Cannington Drive/Balboa Avenue and Eckstrom Avenue/Charger Boulevard/Balboa Avenue are projected to operate at LOS D or better during both AM and PM peak hours. Therefore, the proposed project would result in a significant direct impact to this roadway segment **(Impact TRA-1)**.

18. Balboa Avenue, between Charger Boulevard and I-805 Southbound Ramps.

    The proposed project would add 646 daily trips, resulting in an increase of 0.013 in V/C ratio. The arterial level of service analysis identifies this

roadway segment to operate at LOS B and LOS C in the eastbound and westbound directions, respectively, during the AM peak hour, and LOS B and LOS D in the eastbound and westbound directions, respectively, during the PM peak hour. The intersections of Eckstrom Avenue/Charger Boulevard/Balboa Avenue and I-805 Southbound Ramps/Balboa Avenue are projected to operate at LOS D or better during both AM and PM peak hours. Therefore, the proposed project would not result in a significant direct impact to this roadway segment **(Impact TRA-1)**.

Ramp Meters

The ramp meter analysis results are the same for all three access options. As shown in the Table 2.4-7, the anticipated peak hour demand under this traffic scenario would not exceed the average meter rate at either of the study ramp meter locations. Based upon the significance criteria presented in Table 2.4-4, the addition of project traffic would not cause a significant impact to either of the study ramp meter locations.

Near-Term plus Project (Year 2021)

The Near-Term plus Project traffic scenario represents an analysis of traffic conditions in Year 2021 (i.e., approximate opening year for the proposed project) with the addition of trips generated by the proposed project. Under this scenario, the proposed project's traffic volumes were added to baseline traffic volumes, which includes traffic generated by other nearby developments expected to be completed by Year 2021. Based on review of the City's "Open DSD" website and consultation with City staff, six projects were identified for inclusion in the Near-Term plus Project traffic impact analysis due to their potential to add traffic to the project study area. Those cumulative projects would include two new or relocated charter schools, a residential care facility, a 106-room hotel, approximately 670 residential units and approximately 20,000 square feet (SF) of retail space. The cumulative projects that have potential to affect the project study area are listed in Table 1-3 of this EIR and were estimated to generate approximately 8,103 daily trips, 1,431 AM peak hour trips, and 870 PM peak hour trips. It should be noted that those projects listed in the table that would have no potential for cumulative traffic impacts are not included in this analysis. Additional detail on the cumulative projects assumed for this traffic scenario is provided in Appendix I.

Table 2.4-8 displays intersection LOS and average vehicle delay results for the key study area intersections under Near-Term plus Project conditions. **Table 2.4-9** displays the LOS analysis results for key study area roadway segments under Near-Term plus Project conditions. **Tables 2.4-10A and 2.4-10B** summarize the ramp metering analysis for Near-Term plus Project conditions at the two study intersections (no. 15 and no. 16) with ~~activated~~ most restrictive ramp meters using SOV and HOV data. Level of service calculation worksheets and ramp meter analysis details for Near-Term plus Project conditions are provided in Appendix I.

Table 2.4-8
Peak Hour Intersection Level of Service – Near-Term plus Project

Intersection	Control	No Project				With Access Option 1						With Access Option 2						With Access Option 3					
		Avg. Delay (sec) AM	LOS AM	Avg. Delay (sec) PM	LOS PM	Avg. Delay (sec) AM	LOS AM	Avg. Delay (sec) PM	LOS PM	Change in Delay AM/PM	Sig Impact?	Avg. Delay (sec) AM	LOS AM	Avg. Delay (sec) PM	LOS PM	Change in Delay AM/PM	Sig Impact?	Avg. Delay (sec) AM	LOS AM	Avg. Delay (sec) PM	LOS PM	Change in Delay AM/PM	Sig Impact?
1: Genesee Ave & Clairemont Mesa Blvd	Signal	43.0	D	61.5	**E**	43.40	D	63.40	**E**			43.40	D	63.40	**E**			43.40	D	63.40	**E**		
2: Genesee Ave & Bannock Ave	Signal	20.0	B	10.4	B	20.10	C	10.40	B			20.10	C	10.40	B			20.10	C	10.40	B		
3: Genesee Ave & Chateau Dr	Signal	11.4	B	4.6	A	11.60	B	4.60	A			11.60	B	4.60	A			11.60	B	4.60	A		
4: Mt Herbert Ave & Genesee Ave	Signal	13.6	B	7.7	A	13.60	B	7.70	A			13.60	B	7.70	A			13.60	B	7.70	A		
5: Genesee Ave & Derrick Dr	Signal	17.0	B	51.1	D	16.90	B	52.10	D			16.90	B	52.10	D			16.90	B	52.10	D		
6: Mt Everest Blvd & Mt Etna Dr	AWSC	9.4	A	10.8	B	9.60	A	11.10	B	0.2/0.3	N/N	9.50	A	11.00	B	0.1/0.2	N/N	9.50	A	11.00	B	0.1/0.2	N/N
7: Genesee Ave & Mt Etna Dr	Signal	19.7	B	24.6	C	22.10	C	25.60	C	2.4/1.0	N/N	20.80	C	25.20	C	1.1/0.6	N/N	20.70	C	25.10	C	1.0/0.5	N/N
8: Clairemont Dr & Balboa Ave	Signal	48.0	D	68.2	**E**	48.60	D	69.70	**E**			48.60	D	69.70	**E**			48.60	D	69.70	**E**		
9: Balboa Ave & Mt Everest Blvd	Signal	116.5	**F**	64.7	**E**	127.70	**F**	65.50	**E**	11.2/0.8	**Y**/N	123.40	**F**	65.20	**E**	6.9/0.5	Y/N	124.50	**F**	69.50	**E**	8.0/4.8	**Y/Y**
10: Genesee Ave & Balboa Ave	Signal	41.1	D	59.2	**E**	41.80	D	60.00	**E**	0.7/0.8	N/N	41.90	D	60.10	**E**	0.8/0.9	N/N	43.30	D	64.90	**E**	2.2/5.7	N/**Y**
11: Balboa Ave & Shopping Center Drwy	Signal	21.1	C	15.1	B	21.30	C	14.90	B			21.30	C	14.90	B			21.30	C	14.90	B		
12: Mt Alifan Dr/Mt Abernathy Ave & Balboa Ave	Signal	39.1	D	44.4	D	41.10	D	44.60	D			41.10	D	44.60	D			41.10	D	44.60	D		
13: Mt Albertine Ave/Cannington Dr & Balboa Ave	Signal	10.5	B	28.9	C	10.50	B	31.20	C			10.50	B	31.20	C			10.50	B	31.20	C		
14: Eckstrom Ave/Charger Blvd & Balboa Ave	Signal	64.7	**E**	42.9	D	67.10	**E**	42.80	D			67.10	**E**	42.80	D			67.10	**E**	42.80	D		
15: I-805 SB Ramps & Balboa Ave	Signal	12.5	B	9.0	A	14.10	B	10.40	B			14.10	B	10.40	B			14.10	B	10.40	B		
16: I-805 NB Ramps & Balboa Ave	Signal	8.8	A	9.1	A	9.90	A	10.10	B			9.90	A	10.10	B			9.90	A	10.10	B		
17: Genesee Ave & Mt Alifan Dr	Signal	58.6	**E**	55.2	**E**	58.60	**E**	55.20	**E**			58.60	**E**	55.20	**E**			58.60	**E**	55.20	**E**		
18: Project Driveway #1 & Mt Etna Dr	SSSC	DNE	DNE	DNE	DNE	9.90	A	10.50	B	9.9/10.5	N/N	9.50	A	10.10	B	9.5/10.1	N/N	9.30	A	9.70	A	9.3/9.7	N/N
19: Genesee Ave & Project Driveway #2	SSSC	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	12.10	B	17.70	C	12.1/17.7	N/N	11.90	B	17.20	C	11.9/17.2	N/N
20: Balboa Ave & Project Driveway #3	SSSC	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	13.90	B	17.20	C	13.9/17.2	N/N

NOTES:
Bold letter indicates unacceptable LOS E or F and significant impact.
AWSC = all-way stop controlled; SSSC = side-street stop controlled; DNE = does not exist
Delay and Significance Analysis is provided from the Addendum to the TIA contained in Appendix I-2
SOURCE: Chen Ryan 2019 (Appendix I-4)

Table 2.4-9
Roadway Segment Level of Service – Near-Term plus Project

Roadway	Segment	Cross-Section	Capacity (LOS E)	No Project			With Access Option 1					With Access Option 2					With Access Option 3				
				ADT	V/C	LOS	ADT	V/C	LOS	Change	Sig Impact?	ADT	V/C	LOS	Change	Sig Impact?	ADT	V/C	LOS	Change	Sig Impact?
Genesee Avenue	Appleton Street & Clairemont Mesa Boulevard	4M	40,000	23,230	0.581	C	23,512	0.588	C			23,512	0.588	C			23,512	0.588	C		
Genesee Avenue	Clairemont Mesa Boulevard & Bannock Avenue	4M	40,000	24,700	0.618	C	25,064	0.627	C			25,064	0.627	C			25,064	0.627	C		
Genesee Avenue	Bannock Avenue & Chateau Drive	4M	40,000	25,460	0.637	C	25,824	0.646	C			25,824	0.646	C			25,824	0.646	C		
Genesee Avenue	Chateau Drive & Mount Herbert Avenue	4M	40,000	25,180	0.630	C	25,564	0.639	C			25,564	0.639	C			25,564	0.639	C		
Genesee Avenue	Mount Herbert Avenue & Derrick Drive	4M	40,000	23,460	0.587	C	23,844	0.596	C			23,844	0.596	C			23,844	0.596	C		
Genesee Avenue	Derrick Drive & Mount Etna Drive	6M	50,000	25,880	0.518	B	26,424	0.528	B			26,424	0.528	B			26,424	0.528	B		
Genesee Avenue	Mount Etna Drive & Balboa Avenue	5M	45,000	28,060	0.624	C	29,008	0.645	C	0.21	N	29,228	0.650	C	0.026	N	28,890	0.642	C	0.018	N
Genesee Avenue	Balboa Avenue & Mount Alifan Drive	5M	45,000	24,110	0.536	B	24,392	0.542	B			24,392	0.542	B			24,391	0.542	B		
Genesee Avenue	Mount Alifan Drive & Genesee Court	4M	40,000	23,940	0.599	C	24,182	0.605	C			24,182	0.605	C			24,182	0.605	C		
Mount Everest Boulevard	Mount Etna Drive & Balboa Avenue	2C	8,000	4,340	0.543	C	4,764	0.596	C	0.053	N	4,662	0.583	C	0.040	N	4,616	0.577	C	0.034	N
Mount Etna Drive	Mount Everest Boulevard & Genesee Avenue	2C	8,000	4,090	0.511	C	6,108	0.764	D	0.253	N	5,286	0.661	D	0.150	N	5,129	0.641	D	0.130	N
Balboa Avenue	Clairemont Drive & Mount Everest Boulevard	4M	40,000	36,120	0.903	**E**	36,504	0.913	**E**			36,504	0.913	**E**			36,504	0.913	**E**		
Balboa Avenue	Mount Everest Boulevard & Genesee Avenue	4M	40,000	33,020	0.826	D	33,020	0.826	D	0.000	N	33,122	0.828	D	0.002	N	33,242	0.831	D	0.005	N
Balboa Avenue	Genesee Avenue & Shopping Center Driveway	6M	50,000	33,460	0.669	C	34,126	0.683	C			34,126	0.683	C			34,126	0.683	C		
Balboa Avenue	Shopping Center Driveway & Mount Abernathy Avenue	6M	50,000	36,870	0.737	C	37,536	0.751	C			37,536	0.751	C			37,536	0.751	C		
Balboa Avenue	Mount Abernathy Avenue & Cannington Drive	6M	50,000	48,610	0.972	**E**	49,256	0.985	**E**			49,256	0.985	**E**			49,256	0.985	**E**		
Balboa Avenue	Cannington Drive & Charger Boulevard	6M	50,000	50,930	1.019	**F**	51,576	1.032	**F**			51,576	1.032	**F**			51,576	1.032	**F**		
Balboa Avenue	Charger Boulevard & I-805 Southbound Ramps	6M	50,000	63,430	1.269	**F**	64,076	1.282	**F**			64,076	1.282	**F**			64,076	1.282	**F**		
Balboa Avenue	I-805 Southbound & I-805 Northbound Ramps	8P	80,000	50,180	.627	C	50,665	0.633	C			50,665	0.633	C			50,665	0.633	C		
Balboa Avenue	I-805 Northbound Ramps and Ruffner Street	6M	50,000	51,430	1.029	**F**	51,752	1.035	**F**			51,752	1.035	**F**			51,752	1.035	**F**		

NOTES:
Bold letter indicates unacceptable LOS E or F.
ADT = average daily traffic; V/C = volume-to-capacity ratio; LOS = level of service
Delay and Significance Analysis is provided from the Addendum to the TIA contained in Appendix I-2
SOURCE: Chen Ryan 2019 (Appendix I-4)

Table 2.4-10
Ramp Metering Analysis – Near-Term plus Project

On-Ramp	# of Lanes SOV	# of Lanes HOV	Peak Hour	Demand[a] (veh/hr) per lane	Meter Rate[b] (veh/hr) per lane	Excess Demand[c] (veh/hr) per lane	Delay[d] (min)	Queue[e] (ft)	Storage Length (ft)	Excess Queue (ft)	Delay w/o Project (min)	Δ Delay (min)	S?
I-805 SB On-Ramp @ Balboa Ave EB	1	1	PM	395	423	0	0	0	1,000	0	0	0.0	No
I-805 NB Ramp @ Balboa Ave EB	1	1	AM	316	511	0	0	0	410	0	0	0.0	No

NOTES:
SOV = single-occupancy vehicle; HOV = high-occupancy vehicle
Based upon field observation, it is estimated that 20% of the vehicles at these ramp meters use the HOV lane when available.
[a] Demand is the peak hour demand expected to use the on-ramp.
[b] Meter Rate is the peak hour capacity expected to be processed through the ramp meter. This value was obtained from Caltrans.
[c] Excess Demand = (Demand) – (Meter Rate) or zero, whichever is greater.
[d] Delay = (Excess Demand / Meter Rate) X 60 min/hr.
[e] Queue = (Excess Demand) X 29 ft/veh.

SOURCE: Chen Ryan 2019 (Appendix I-1)

Table 2.4-10A Ramp Metering Analysis – Near-Term Year 2021 Base Plus Project Conditions (SOV)

On-Ramp	# of Lanes SOV	# of Lanes HOV	Peak Hour	Demand[1] (veh/hr) per lane	Meter Rate[2] (veh/hr) per lane	Excess Demand[3] (veh/hr) per lane	Max Obs. Delay[4] (min)	Max Obs Queue[5] (ft)	Storage Length (ft)	Excess Queue (ft)	Delay w/o Project (min)	Δ Delay (min)	S?
I-805 SB On-Ramp @ Balboa Ave EB	1	1	PM	390	347	43	7.4	215	1,000	0	6.4	1.0	No
I-805 NB Ramp @ Balboa Ave EB	1	1	AM	315	451	0	0	0	410	0	0	0.0	No

SOV = Single Occupancy Vehicle; HOV = High Occupancy Vehicle.
[1] Demand is the peak hour demand expected to use the on-ramp.
[2] Meter Rate is the peak hour capacity expected to be processed through the ramp meter. This value was obtained from Caltrans.
[3] Excess Demand = (Demand) – (Meter Rate) or zero, whichever is greater.
[4] Delay = (Excess Demand / Meter Rate) X 60 min/hr.
[5] Queue = (Excess Demand) X 29 ft/veh.
SOURCE: Chen Ryan 2019 (Appendix I-1)

Table 2.4-10B Ramp Metering Analysis – Near-Term Year 2021 Base Plus Project Conditions (HOV)

On-Ramp	# of Lanes SOV	# of Lanes HOV	Peak Hour	Demand[1] (veh/hr) per lane	Meter Rate[2] (veh/hr) per lane	Excess Demand[3] (veh/hr) per lane	Max Obs. Delay[4] (min)	Max Obs Queue[5] (ft)	Storage Length (ft)	Excess Queue (ft)	Delay w/o Project (min)	Δ Delay (min)	S?
I-805 SB On-Ramp @ Balboa Ave EB	1	1	PM	98	347	0	0	0	1,000	0	0	0.0	No
I-805 NB Ramp @ Balboa Ave EB	1	1	AM	79	451	0	0	0	410	0	0	0.0	No

SOV = Single Occupancy Vehicle; HOV = High Occupancy Vehicle.
[1] Demand is the peak hour demand expected to use the on-ramp.
[2] Meter Rate is the peak hour capacity expected to be processed through the ramp meter. This value was obtained from Caltrans.
[3] Excess Demand = (Demand) – (Meter Rate) or zero, whichever is greater.
[4] Delay = (Excess Demand / Meter Rate) X 60 min/hr.
[5] Queue = (Excess Demand) X 29 ft/veh.
SOURCE: Chen Ryan 2019 (Appendix I-1)

Intersections – Access Options 1 and 2

The intersection LOS analysis results are the same for Access Options 1 and 2. As shown in Table 2.4-8, all of the study area intersections would operate at acceptable LOS D or better during both the AM and PM peak hours with Access Options 1 and 2, with the exception of the following six intersections:

1. Genesee Avenue & Clairemont Mesa Boulevard – LOS E during the PM peak hour;
8. Clairemont Drive & Balboa Avenue – LOS E during the PM peak hour;
9. Mount Everest Boulevard & Balboa Avenue – LOS F during the AM peak hour and LOS E during the PM peak hour;
10. Genesee Avenue & Balboa Avenue – LOS E during the PM peak hour;
14. Charger Boulevard & Balboa Avenue – LOS E during the AM peak hour; and
17. Genesee Avenue & Mount Alifan Drive – LOS E during both the AM and PM peak hours.

Based on the City's Significance Determination Thresholds, outlined above in Table 2.4-4, the traffic generated by Access Options 1 and 2 would result in a significant direct impact at the following two study intersections **(Impact TRA-2)**:

9. Mount Everest Boulevard & Balboa Avenue; and
14. Charger Boulevard & Balboa Avenue.

Intersections – Access Option 3

For Access Option 3, the same six intersections identified above for Access Option 1 would operate at an unacceptable LOS (i.e., LOS E or LOS F) during one or more of the peak hours. Access Option 3 would result in a significant direct intersection impact at the following three study intersections **(Impact TRA-2)**:

9. Mount Everest Boulevard & Balboa Avenue;
10. Genesee Avenue & Balboa Avenue; and
14. Charger Boulevard & Balboa Avenue.

Roadway Segments:

The roadway segment analysis results under Near-Term plus Project conditions are the same for all three access options. As shown in **Table 2.4-9**, all of the key

study area roadway segments would operate at acceptable LOS D or better, with the exception of the following five roadway segments:

12. Balboa Avenue, between Clairemont Drive and Mount Everest Boulevard (LOS E);
16. Balboa Avenue, between Mount Abernathy Avenue and Cannington Drive (LOS E);
17. Balboa Avenue, between Cannington Drive and Charger Boulevard (LOS F);
18. Balboa Avenue, between Charger Boulevard and I-805 Southbound Ramps (LOS F); and
20. Balboa Avenue, between I-805 Northbound Ramps and Ruffner Street (LOS F).

Of the five roadway segments projected to operate at substandard LOS E or F under Near-Term plus Project conditions, the two discussed below could potentially result in a significant direct impact based on the Significance Determination Thresholds outlined in Table 2.4-4. Daily roadway LOS is typically used only at the planning level and does not necessarily indicate true roadway operations. Therefore, to determine if the identified roadway segments operate at acceptable levels during peak times (worst case), peak hour aerial analyses and peak hour intersection analyses were conducted to better understand the actual travel flow along the roadways. If peak hour arterial LOS and the LOS at the intersections at either end of the roadway segment would operate at LOS D or better, and the roadway segment is built to its ultimate classification, then the impact would be considered to be less than significant, since the actual travel flow along the segment is considered to be acceptable.

17. Balboa Avenue, between Cannington Drive and Charger Boulevard.

    The proposed project would add 646 daily trips, resulting in an increase of 0.013 in V/C ratio. The arterial level of service analysis identifies this roadway segment to operate at LOS E and LOS D in the eastbound and westbound directions, respectively, during the AM peak hour, and LOS F and LOS D in the eastbound and westbound directions, respectively, during the PM peak hour. The intersections of Mount Albertine Avenue/Cannington Drive/Balboa Avenue and Eckstrom Avenue/Charger Boulevard/Balboa Avenue are projected to operate at LOS D or better during both AM and PM peak hours. Therefore, the proposed project would result in a significant direct impact to this roadway segment **(Impact TRA-2)**.

18. Balboa Avenue, between Charger Boulevard and I-805 Southbound Ramps.

    The proposed project would add 962 daily trips, resulting in an increase of 0.013 in V/C ratio. The arterial level of service analysis identifies this roadway segment to operate at LOS B and LOS C in the eastbound and westbound directions, respectively, during the AM peak hour, and LOS B and LOS D in the eastbound and westbound directions, respectively, during the PM peak hour. The intersection of Eckstrom Avenue/Charger Boulevard/Balboa Avenue is projected to operate at LOS E in the AM peak hour and LOS D in the PM peak hour, and the intersection of I-805 Southbound Ramps/Balboa Avenue is projected to operate at LOS B or better during both AM and PM peak hours. Therefore, the proposed project would result in a significant direct impact to this roadway segment **(Impact TRA-2)**.

Ramp Meters

The ramp meter analysis results are the same for all three access options. As shown in Table 2.4-10, the anticipated peak hour demand under this traffic scenario would not exceed the average meter rate at either of the study ramp meter locations. Based upon the Significance Determination Thresholds presented in Table 2.4-4, the addition of project traffic would not cause a significant impact to either of the study ramp meter locations.

Cumulative plus Project (Year 2050)

The Cumulative plus Project traffic scenario represents an analysis of traffic conditions at community buildout in Year 2050 with the addition of trips generated by the proposed project. Under this scenario, the proposed project's traffic volumes were added to baseline traffic volumes. Similar to the Select Zone analysis that was used for the project's trip distribution, the forecast model for the CMCP Update was used to develop the Year 2050 volumes. The peak hour intersection turning movements were developed by comparing existing and forecasted Year 2050 ADTs, as well as peak hour approach and departure volumes, then applying the respective growth factors. Manual adjustments were also made to ensure that traffic volumes among adjacent intersections are reasonably balanced.

Table 2.4-11 displays intersection LOS and average vehicle delay results for the key study area intersections under Cumulative plus Project conditions. **Table 2.4-12** displays the LOS analysis results for key study area roadway segments under Cumulative plus Project conditions. **Tables 2.4-13A and 2.4-13B** summarize the ramp metering analysis for Cumulative plus Project conditions at the two study intersections (no. 15 and no. 16) with ~~activated~~ most restrictive ramp meters using SOV and HOV data. Level of service calculation worksheets and ramp meter analysis details for Cumulative plus Project conditions are provided in Appendix I.

Table 2.4-11
Peak Hour Intersection Level of Service – Cumulative plus Project

Intersection	Control	No Project				With Access Option 1						With Access Option 2						With Access Option 3					
		Avg. Delay (sec) AM	LOS AM	Avg. Delay (sec) PM	LOS PM	Avg. Delay (sec) AM	LOS AM	Avg. Delay (sec) PM	LOS PM	Change in Delay AM/PM	Sig Impact?	Avg. Delay (sec) AM	LOS AM	Avg. Delay (sec) PM	LOS PM	Change in Delay AM/PM	Sig Impact?	Avg. Delay (sec) AM	LOS AM	Avg. Delay (sec) PM	LOS PM	Change in Delay AM/PM	Sig Impact?
1: Genesee Ave & Clairemont Mesa Blvd	Signal	65.9	**E**	95.9	**F**	67.50	**E**	98.50	**F**			67.50	**E**	98.50	**F**			67.50	**E**	98.50	**F**		
2: Genesee Ave & Bannock Ave	Signal	28.5	C	12.7	B	28.60	C	12.80	B			28.60	C	12.80	B			28.60	C	12.80	B		
3: Genesee Ave & Chateau Dr	Signal	12.4	B	5.9	A	12.90	B	5.80	A			12.90	B	5.80	A			12.90	B	5.80	A		
4: Mt Herbert Ave & Genesee Ave	Signal	18.7	B	10.9	B	18.80	B	10.80	B			18.80	B	10.80	B			18.80	B	10.80	B		
5: Genesee Ave & Derrick Dr	Signal	18.0	B	51.0	D	17.90	B	52.10	D			17.90	B	52.10	D			17.90	B	52.10	D		
6: Mt Everest Blvd & Mt Etna Dr	AWSC	10.8	B	13.9	B	11.10	B	14.60	B	0.3/0.7	N/N	11.00	B	14.40	B	0.2/0.5	N/N	11.00	B	14.30	B	0.2/0.4	N/N
7: Genesee Ave & Mt Etna Dr	Signal	21.7	C	26.6	C	23.60	C	27.40	C	1.9/0.8	N/N	22.80	C	27.30	C	1.1/0.7	N//N	22.60	C	27.20	C	0.9/0.6	N/N
8: Clairemont Dr & Balboa Ave	Signal	65.4	**E**	100.6	**F**	66.00	**E**	102.10	**F**			66.00	**E**	102.10	**F**			66.00	**E**	102.10	**F**		
9: Balboa Ave & Mt Everest Blvd	Signal	107.9	**F**	110.4	**F**	110.90	**F**	112.70	**F**	3.0/2.3	**Y/Y**	109.80	**F**	112.30	**F**	1.9/1.9	**Y/Y**	112.10	**F**	120.20	**F**	4.2/9.8	**Y/Y**
10: Genesee Ave & Balboa Ave	Signal	42.1	D	80.2	**F**	44.70	D	83.40	F	2.6/3.2	N/**Y**	44.90	D	84.30	**F**	2.8/4.1	N/**Y**	47.30	D	90.20	**F**	5.2/10.0	N/**Y**
11: Balboa Ave & Shopping Center Drwy	Signal	24.7	C	15.3	B	24.80	C	15.10	B			24.80	C	15.10	B			24.80	C	15.10	B		
12: Mt Alifan Dr/Mt Abernathy Ave & Balboa Ave	Signal	43.5	D	52.5	D	45.80	D	52.80	D			45.80	D	52.80	D			45.80	D	52.80	D		
13: Mt Albertine Ave/Cannington Dr & Balboa Ave	Signal	17.2	B	33.0	C	17.30	B	35.20	D			17.30	B	35.20	D			17.30	B	35.20	D		
14: Eckstrom Ave/Charger Blvd & Balboa Ave	Signal	54.3	D	48.0	D	56.30	**E**	47.90	D			56.30	**E**	47.90	D			56.30	**E**	47.90	D		
15: I-805 SB Ramps & Balboa Ave	Signal	11.1	B	9.2	A	11.20	B	9.40	A			11.20	B	9.40	A			11.20	B	9.40	A		
16: I-805 NB Ramps & Balboa Ave	Signal	10.5	B	10.6	B	10.50	B	10.60	B			10.50	B	10.60	B			10.50	B	10.60	B		
17: Genesee Ave & Mt Alifan Dr	Signal	50.2	D	58.4	E	50.20	D	58.50	**E**			50.20	D	58.50	**E**			50.20	D	58.40	**E**		
18: Project Driveway #1 & Mt Etna Dr	SSSC	DNE	DNE	DNE	DNE	10.50	B	11.30	B	10.5/11.3	N/N	10.00	A	10.80	B	10.0/10.8	N/N	9.80	A	10.30	B	9.8/10.3	N/N
19: Genesee Ave & Project Driveway #2	SSSC	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	13.00	B	16.70	C	13.0/16.7	N/N	12.70	B	16.30	C	12.7/16.3	N/N
20: Balboa Ave & Project Driveway #3	SSSC	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	16.90	C	19.90	C	16.9/19.9	N/N

NOTES:
Bold letter indicates unacceptable LOS E or F and significant impact.
AWSC = all-way stop controlled; SSSC = side-street stop controlled; DNE = does not exist
Delay and Significance Analysis is provided from the Addendum to the TIA contained in Appendix I-2
SOURCE: Chen Ryan 2019 (Appendix I-4)

Table 2.4-12
Roadway Segment Level of Service – Cumulative plus Project

Roadway	Segment	Cross-Section	Capacity (LOS E)	No Project			With Access Option 1					With Access Option 2					With Access Option 3				
				ADT	V/C	LOS	ADT	V/C	LOS	Change	Sig Impact?	ADT	V/C	LOS	Change	Sig Impact?	ADT	V/C	LOS	Change	Sig Impact?
Genesee Avenue	Appleton Street & Clairemont Mesa Boulevard	4M	40,000	31,900	0.798	D	32,182	0.805	D			32,182	0.805	D			32,182	0.805	D		
Genesee Avenue	Clairemont Mesa Boulevard & Bannock Avenue	4M	40,000	30,000	0.750	C	30,364	0.759	D			30,364	0.759	D			30,364	0.759	D		
Genesee Avenue	Bannock Avenue & Chateau Drive	4M	40,000	27,800	0.695	C	28,164	0.704	C			28,164	0.704	C			28,164	0.704	C		
Genesee Avenue	Chateau Drive & Mount Herbert Avenue	4M	40,000	25,500	0.638	C	25,884	0.647	C			25,884	0.647	C			25,884	0.647	C		
Genesee Avenue	Mount Herbert Avenue & Derrick Drive	4M	40,000	20,900	0.523	B	21,284	0.532	C			21,284	0.532	C			21,284	0.532	C		
Genesee Avenue	Derrick Drive & Mount Etna Drive	6M	50,000	23,900	0.478	B	24,444	0.489	B			24,444	0.489	B			24,444	0.489	B		
Genesee Avenue	Mount Etna Drive & Balboa Avenue	5M	45,000	25,000	0.556	C	25,948	0.577	C	0.021	N	26,168	0.582	C	0.026	N	25,830	0.574	C	0.018	N
Genesee Avenue	Balboa Avenue & Mount Alifan Drive	5M	45,000	22,100	0.491	B	22,382	0.497	B			22,382	0.497	B			22,381	0.497	B		
Genesee Avenue	Mount Alifan Drive & Genesee Court	4M	40,000	21,900	0.548	C	22,142	0.554	C			22,142	0.554	C			22,142	0.554	C		
Mount Everest Boulevard	Mount Etna Drive & Balboa Avenue	2C	8,000	5,900	0.738	D	6,324	0.791	D	0.053	N	6,222	0.778	D	0.040	N	6,176	0.772	D	0.034	N
Mount Etna Drive	Mount Everest Boulevard & Genesee Avenue	2C	8,000	5,100	0.638	D	7,118	0.890	**E**	0.252	**Y**	6,296	0.787	D	0.149	N	6,139	0.767	D	0.129	N
Balboa Avenue	Clairemont Drive & Mount Everest Boulevard	4M	40,000	33,800	0.845	D	34,184	0.855	D			34,184	0.855	D			34,184	0.855	D		
Balboa Avenue	Mount Everest Boulevard & Genesee Avenue	4M	40,000	35,200	0.880	**E**	35,200	0.880	**E**	0.000	N	35,302	0.883	**E**	0.003	N	35,422	0.886	**E**	0.006	N
Balboa Avenue	Genesee Avenue & Shopping Center Driveway	6M	50,000	43,500	0.870	D	44,166	0.883	D			44,166	0.883	D			44,166	0.883	D		
Balboa Avenue	Shopping Center Driveway & Mount Abernathy Avenue	6M	50,000	33,100	0.662	C	33,766	0.675	C			33,766	0.675	C			33,766	0.675	C		
Balboa Avenue	Mount Abernathy Avenue & Cannington Drive	6M	50,000	47,400	0.948	**E**	48,046	0.961	**E**			48,046	0.961	**E**			48,046	0.961	**E**		
Balboa Avenue	Cannington Drive & Charger Boulevard	6M	50,000	47,500	0.950	**E**	48,146	0.963	**E**			48,146	0.963	**E**			48,146	0.963	**E**		
Balboa Avenue	Charger Boulevard & I-805 Southbound Ramps	6M	50,000	65,200	1.304	**F**	65,846	1.317	**F**			65,846	1.317	**F**			65,846	1.317	**F**		
Balboa Avenue	I-805 Southbound & I-805 Northbound Ramps	8P	80,000	57,400	0.718	C	57,885	0.724	C			57,885	0.724	C			57,885	0.724	C		
Balboa Avenue	I-805 Northbound Ramps and Ruffner Street	6M	50,000	62,400	1.248	**F**	62,722	1.254	**F**			62,722	1.254	**F**			62,722	1.254	**F**		

NOTES:
Bold letter indicates unacceptable LOS E or F.
ADT = average daily traffic; V/C = volume-to-capacity ratio; LOS = level of service
Delay and Significance Analysis is provided from the Addendum to the TIA contained in Appendix I-2
SOURCE: Chen Ryan 2019 (Appendix I-4)

Table 2.4-13
Ramp Metering Analysis – Cumulative plus Project

On-Ramp	# of Lanes SOV	# of Lanes HOV	Peak Hour	Demand[a] (veh/hr) per lane	Meter Rate[b] (veh/hr) per lane	Excess Demand[c] (veh/hr) per lane	Delay[d] (min)	Queue[e] (ft)	Storage Length (ft)	Excess Queue (ft)	Delay w/o Project (min)	Δ Delay (min)	S?
I-805 SB On-Ramp @ Balboa Ave EB	1	1	PM	435	423	12	1.7	348	1,000	0	0.1	0.16	No
I-805 NB Ramp @ Balboa Ave EB	1	1	AM	386	511	0	0	0	410	0	0	0.0	No

NOTES:
SOV = single-occupancy vehicle; HOV = high-occupancy vehicle
Based upon field observation, it is estimated that 20% of the vehicles at these ramp meters use the HOV lane when available.
[a] Demand is the peak hour demand expected to use the on-ramp.
[b] Meter Rate is the peak hour capacity expected to be processed through the ramp meter. This value was obtained from Caltrans.
[c] Excess Demand = (Demand) – (Meter Rate) or zero, whichever is greater.
[d] Delay = (Excess Demand / Meter Rate) X 60 min/hr.
[e] Queue = (Excess Demand) X 29 ft/veh.

SOURCE: Chen Ryan 2019 (Appendix I-1)

Table 2.4-13A Ramp Metering Analysis – Horizon Year 2050 Base Plus Project Conditions (SOV)

On-Ramp	# of Lanes SOV	# of Lanes HOV	Peak Hour	Demand[1] (veh/hr) per lane	Meter Rate[2] (veh/hr) per lane	Excess Demand[3] (veh/hr) per lane	Max Obs. Delay[4] (min)	Max Obs Queue[5] (ft)	Storage Length (ft)	Excess Queue (ft)	Delay w/o Project (min)	Δ Delay (min)	S?
I-805 SB On-Ramp @ Balboa Ave EB	1	1	PM	430	347	83	14.4	2,407	1,000	1,407	13.3	1.1	No
I-805 NB Ramp @ Balboa Ave EB	1	1	AM	386	451	0	0	0	410	0	0	0.0	No

SOV = Single Occupancy Vehicle; HOV = High Occupancy Vehicle.
[1] Demand is the peak hour demand expected to use the on-ramp.
[2] Meter Rate is the peak hour capacity expected to be processed through the ramp meter. This value was obtained from Caltrans.
[3] Excess Demand = (Demand) – (Meter Rate) or zero, whichever is greater.
[4] Delay = (Excess Demand / Meter Rate) X 60 min/hr.
[5] Queue = (Excess Demand) X 29 ft/veh.
SOURCE: Chen Ryan 2019 (Appendix I-1)

Table 2.4-13B Ramp Metering Analysis – Horizon Year 2050 Base Plus Project Conditions (HOV)

On-Ramp	# of Lanes SOV	# of Lanes HOV	Peak Hour	Demand[1] (veh/hr) per lane	Meter Rate[2] (veh/hr) per lane	Excess Demand[3] (veh/hr) per lane	Max Obs. Delay[4] (min)	Max Obs Queue[5] (ft)	Storage Length (ft)	Excess Queue (ft)	Delay w/o Project (min)	Δ Delay (min)	S?
I-805 SB On-Ramp @ Balboa Ave EB	1	1	PM	108	347	0	0	0	1,000	0	0	0.0	No
I-805 NB Ramp @ Balboa Ave EB	1	1	AM	96	451	0	0	0	410	0	0	0.0	No

SOV = Single Occupancy Vehicle; HOV = High Occupancy Vehicle.
[1] Demand is the peak hour demand expected to use the on-ramp.
[2] Meter Rate is the peak hour capacity expected to be processed through the ramp meter. This value was obtained from Caltrans.
[3] Excess Demand = (Demand) – (Meter Rate) or zero, whichever is greater.
[4] Delay = (Excess Demand / Meter Rate) X 60 min/hr.
[5] Queue = (Excess Demand) X 29 ft/veh.
SOURCE: Chen Ryan 2019 (Appendix I-1)

Intersections

The LOS results are the same for all three access options. As shown in Table 2.4-11, all of the study area intersections would operate at acceptable LOS D or better during both the AM and PM peak hours with all three access options, with the exception of the following six intersections:

1. Genesee Avenue & Clairemont Mesa Boulevard – LOS E during the AM peak hour and LOS F during the PM peak hour;
8. Clairemont Drive & Balboa Avenue – LOS E during the AM peak hour and LOS F during the PM peak hour;
9. Mount Everest Boulevard & Balboa Avenue – LOS F during both the AM and PM peak hours;
10. Genesee Avenue & Balboa Avenue – LOS F during the PM peak hour;
14. Charger Boulevard & Balboa Avenue – LOS E during the AM peak hour; and
17. Genesee Avenue & Mount Alifan Drive – LOS E during the PM peak hour.

Based on the City's Significance Determination Thresholds, outlined above in Table 2.4-4, the traffic generated by the proposed project would result in a significant cumulative impact at the following five study intersections for all three access options **(Impact TRA-3)**:

1. Genesee Avenue & Clairemont Mesa Boulevard;
8. Clairemont Drive & Balboa Avenue;
9. Mount Everest Boulevard & Balboa Avenue;
10. Genesee Avenue & Balboa Avenue; and
14. Charger Boulevard & Balboa Avenue.

Roadway Segments – Access Option 1

As shown in the Table 2.4-12, all of the key study area roadway segments would operate at acceptable LOS D or better with Access Option 1, with the exception of the following six roadway segments:

11. Mount Etna Drive, between Mount Everest Boulevard and Genesee Avenue (LOS E);
13. Balboa Avenue, between Mount Everest Boulevard and Genesee Avenue (LOS E);
16. Balboa Avenue, between Mount Abernathy Avenue and Cannington Drive (LOS E);

17. Balboa Avenue, between Cannington Drive and Charger Boulevard (LOS E);
18. Balboa Avenue, between Charger Boulevard and I-805 Southbound Ramps (LOS F); and
20. Balboa Avenue, between I-805 Northbound Ramps and Ruffner Street (LOS F).

Of the six roadway segments projected to operate at substandard LOS E or F under Cumulative plus Project conditions, the Access Option 1 could cause potentially significant cumulative impacts at the two roadway segments discussed below based on the Significance Determination Thresholds outlined in Table 2.4-4. Daily roadway LOS is typically used only at the planning level and does not necessarily indicate true roadway operations. Therefore, to determine if the identified roadway segments operate at acceptable levels during peak times (worst case), peak hour aerial analyses and peak hour intersection analyses were conducted to better understand the actual travel flow along the roadways. If peak hour arterial LOS and the LOS at the intersections at either end of the roadway segment would operate at LOS D or better, and the roadway segment is built to its ultimate classification, then the impact would be considered to be less than significant, since the actual travel flow along the segment is considered to be acceptable.

11. Mount Etna Drive, between Mount Everest Boulevard and Genesee Avenue.

    The proposed project would add 2,018 daily trips, resulting in an increase of 0.252 in V/C ratio. The arterial LOS analysis identifies this roadway segment to operate at LOS E in the eastbound and westbound directions during both the AM and PM peak hours. The intersections of Mount Everest Boulevard/Mount Etna Drive and Genesee Avenue/Mount Etna Drive are projected to operate at LOS C or better during both AM and PM peak hours. Therefore, Access Option 1 would result in a significant cumulative impact to this roadway segment **(Impact TRA-3)**.

18. Balboa Avenue, between Charger Boulevard and I-805 Southbound Ramps.

    The proposed project would add 646 daily trips, resulting in an increase of 0.013 in V/C ratio. The arterial level of service analysis identifies this roadway segment to operate at LOS B and LOS C in the eastbound and westbound directions, respectively, during the AM peak hour, and LOS B and LOS D in the eastbound and westbound directions, respectively, during the PM peak hour. The intersection of Eckstrom Avenue/Charger Boulevard/Balboa Avenue is projected to operate at LOS E in the AM peak hour and LOS D in the PM peak hour, and the intersection of I-805

Southbound Ramps/Balboa Avenue is projected to operate at LOS B or better during both AM and PM peak hours. Therefore, Access Option 1 would result in a significant cumulative impact to this roadway segment **(Impact TRA-3)**.

Roadway Segments – Access Options 2 and 3

The roadway segment analysis results are the same for Access Options 2 and 3. As shown in the Table 2.4-12, all of the key study area roadway segments would operate at acceptable LOS D or better with Access Options 2 and 3, with the exception of the following five roadway segments:

13. Balboa Avenue, between Mount Everest Boulevard and Genesee Avenue (LOS E);
16. Balboa Avenue, between Mount Abernathy Avenue and Cannington Drive (LOS E);
17. Balboa Avenue, between Cannington Drive and Charger Boulevard (LOS E);
18. Balboa Avenue, between Charger Boulevard and I-805 Southbound Ramps (LOS F); and
20. Balboa Avenue, between I-805 Northbound Ramps and Ruffner Street (LOS F).

Of the five roadway segments projected to operate at substandard LOS E or F under Cumulative plus Project conditions, the one discussed below could potentially result in a significant cumulative impact based on the significance criteria outlined in Table 2.4-4.

18. Balboa Avenue, between Charger Boulevard and I-805 Southbound Ramps.

    The proposed project would add 646 daily trips, resulting in an increase of 0.013 in V/C ratio. The arterial level of service analysis identifies this roadway segment to operate at LOS B and LOS C in the eastbound and westbound directions, respectively, during the AM peak hour, and LOS B and LOS D in the eastbound and westbound directions, respectively, during the PM peak hour. The intersection of Eckstrom Avenue/Charger Boulevard/Balboa Avenue is projected to operate at LOS E in the AM peak hour and LOS D in the PM peak hour, and the intersection of I-805 Southbound Ramps/Balboa Avenue is projected to operate at LOS B or better during both AM and PM peak hours. Therefore, Access Options 2 and 3 would result in a significant cumulative impact to this roadway segment **(Impact TRA-3)**.

Ramp Meters

The ramp meter analysis results are the same for all three access options. ~~As shown in Table 2.4-13, the anticipated peak hour demand is anticipated to exceed the anticipated meter rate at the I-805 Southbound Ramp @ Balboa Avenue (eastbound) during the PM peak hour by 12 vehicles and result in a queue length of 348 feet.~~ Based upon the significance criteria presented in Table 2.4-4, the addition of project traffic would not cause a significant impact to either of the study ramp meter locations.

2.4.3.2 Traffic Hazards

Issue 2: Would the project increase traffic hazards for motor vehicles, bicyclists, or pedestrians due to a proposed non-standard design features (e.g., poor sight distance or driveway onto an access-restricted roadway)?

This analysis of impacts under issue question 2 addresses Significance Determination Threshold 4 as detailed in Section 2.4.3, above.

Impact Analysis

The three access options considered in this analysis are described in detail in Chapter 1.0, Project Description. In all three access options, Mount Etna Drive would serve as the main entrance providing full access (i.e., all vehicular movements permitted) to the project site. Access at Genesee Avenue and/or Balboa Avenue would be restricted to right-in, right-out vehicular movements; in other words, no left turns into or out of the project site would be permitted. The driveway would be a side street stop-controlled intersection. All three driveways would operate at LOS C or better for all project study scenarios. All three roadways that would potentially provide access to and from the project site directly from adjacent roads and would be designed using standard geometries that conform to the requirements in the City Street Design Manual such that driveway sight distance would not be affected by roadway characteristics (i.e., horizontal or vertical curves).

Should public road lane closures be required during project demolition and site preparation, a Traffic Control Plan would be implemented by the construction contractor, as required by the County (refer to Chapter 1.0). As discussed in Section 2.2, Hazards and Hazardous Materials, construction of the future development could require lane closures and interfere with emergency response services and evacuation routes. However, with implementation of Mitigation Measure HAZ-2, a Traffic Control Plan would be required, reducing impacts related to interferences with an adopted emergency response plan or emergency evacuation plan to less than significant. The proposed project would meet all requirements for access and ingress/egress of emergency vehicles. Driveways and internal access roads would be constructed in accordance with California

Fire Code and City of San Diego Municipal Code (SDMC) requirements. For the reasons discussed above, potential impacts related to traffic hazards would be less than significant.

2.4.3.3 Circulation Movements and Alternative Transportation

Issue 3: Would the project result in a substantial impact upon existing or planned transportation systems?

Issue 4: Would the project result in a conflict with adopted policies, plans or programs supporting alternative transportation models (e.g., bus turnouts, bicycle racks)?

Issue 5: Would the project result in substantial alterations to present circulation movements that restrict access to public or private land?

The analysis of impacts under Issue 3 are addressed by Significance Determination Thresholds 5 and 6 as detailed in Section 2.4.3, above.

Impact Analysis

Project implementation would not interfere or conflict with General Plan Mobility Element policies or with implementation of planned transportation improvements in the area, as detailed in the evaluation of transportation objectives of the CMCP Transportation Element in Table 2.6-1. The project would not require changes to the existing circulation network and would be consistent with the planned circulation network including mobility planning efforts identified in the CMCP. Additionally, the project site is located in an urbanized area and would not impact existing roadways that provide direct public access to beaches, parks, or other open space areas. Therefore, impacts related to circulation movements and inconsistency with existing or planned transportation systems would be less than significant.

As described above in Section 2.4.1, Existing Conditions, MTS Bus Route #27 and #41 have multiple stops within a mile of the project site. However, there are no bus stops located directly adjacent to the project site. Class II bike lanes are present on both sides of the roadway on Genesee Avenue and on Balboa Avenue near the project site. The San Diego Bicycle Master Plan does not call for any additional bicycle facilities on any of the other study area roadways (i.e., Mount Everest Boulevard, Mount Etna Drive) (City of San Diego, 2012). All streets immediately surrounding the project site include sidewalks and striped crosswalks are provided at major intersections. Pedestrian and bike lane access would continue to be provided during both construction and operation of the proposed project. The proposed project would not conflict with adopted policies, plans, or programs related to public transit, bicycle, or pedestrian facilities, or

otherwise decrease the performance or safety of such facilities. It would, however, encourage use of transit services in the project area by constructing affordable housing in a planned TPA. Therefore, impacts would be less than significant.

2.4.3.4 Vehicle Miles Traveled Analysis

Issue 6: Would the project conflict with or be inconsistent with CEQA Guidelines Section 15064.3 subdivision (b)?

As noted in Section 2.4.2, Regulatory Setting, CEQA Guidelines Section 15064.3, subdivision (b) provides that beginning on July 1, 2020, the provisions of this section shall apply statewide. The City is currently engaged in this process and has not yet formally adopted its updated transportation significance thresholds or its updated transportation impact analysis procedures to include VMT. Since the regulations of SB 743 have not been finalized or adopted by the City, automobile delay described above remains the measure used to determine the significance of a traffic impact. However, a VMT analysis was conducted for the proposed project for information purposes, and is summarized below. Additional detail is provided in Appendix I of this EIR.

Methodology

The VMT analysis for the proposed project was prepared in accordance with the County of San Diego's *Guidelines for Transportation Impact Studies in the San Diego Region*, January 22, 2019 (Regional TIS Guidelines).[2], as well as the City's Draft VMT guidance which is currently undergoing peer review. The Regional TIS Guidelines were developed by a committee of transportation engineers, both public and private, currently operating within the San Diego Region and are primarily based on the standards set forth in OPR's Technical Advisory on Evaluating Transportation Impacts in CEQA (December 2018).[3] The intention of the guidelines is to address the new transportation analysis metrics and requirements, significance thresholds, and standards enacted by SB 743.

Impact Analysis

The Regional TIS Guidelines, ~~and~~ OPR and City provides several screening thresholds to determine if a project is required to do a VMT analysis based on the project's land use and location. The proposed project would allow for 100 percent affordable housing units for residents who earn equal to or less than 50 percent of the Area Median Income (AMI) ~~and would be located in a planned (2035) TPA~~, which ~~are~~ is one of the City criteria for VMT screening. Therefore, a more

[2] Institute of Transportation Engineers San Diego Section (ITE San Diego) Transportation Capacity and Mobility Task Force SB 743 Subcommittee.

[3] http://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf.

detailed VMT analysis is not required and the proposed project is presumed to have a less than significant impact on VMT.

2.4.4 Significance of Impacts Prior to Mitigation

Project impacts related to traffic hazards, circulation movements and alternative transportation, and VMT would be less than significant. The following significant impacts related to traffic generation and capacity would occur with project implementation:

Impact ~~TIA~~TRA-1: Existing plus Project. The proposed project would result in significant direct impacts at the following two study intersections and one study roadway segment:

Intersections:

9. Mount Everest Boulevard & Balboa Avenue (Access Options 1 and 3)
10. Genesee Avenue & Balboa Avenue (Access Option 3)

Roadway Segments:

17. Balboa Avenue, between Cannington Drive and Charger Boulevard (all access options)

Impact ~~TIA~~TRA-2: Near-Term plus Project. The proposed project would result in significant direct impacts at the following three study intersections and two study roadway segments:

Intersections:

9. Mount Everest Boulevard & Balboa Avenue (all access options)
10. Genesee Avenue & Balboa Avenue (Access Option 3)
14. Charger Boulevard & Balboa Avenue (all access options)

Roadway Segments:

17. Balboa Avenue, between Cannington Drive and Charger Boulevard (all access options)
18. Balboa Avenue, between Charger Boulevard and I-805 Southbound Ramps (all access options)

Impact ~~TIA~~TRA-3: Cumulative plus Project. The proposed project would result in significant impacts at the following five study intersections and two study roadway segments:

Intersections:

1. Genesee Avenue & Clairemont Mesa Boulevard (all access options)
8. Clairemont Drive & Balboa Avenue (all access options)
9. Mount Everest Boulevard & Balboa Avenue (all access options)
10. Genesee Avenue & Balboa Avenue (all access options)
14. Charger Boulevard & Balboa Avenue (all access options)

Roadway Segments:

11. Mount Etna Drive, between Mount Everest Boulevard and Genesee Avenue (Access Option 1)
18. Balboa Avenue, between Charger Boulevard and I-805 Southbound Ramps (all access options)

2.4.5 Mitigation

Existing plus Project

The mitigation measures described below would be required to reduce the project's impact to intersections ~~and roadway segments~~ to a less-than-significant level. The effectiveness of the mitigation measures is shown in **Table 2.4-14**.

Intersections

TRA-1: Mount Everest Boulevard & Balboa Avenue Intersection Modifications (Access Options 1 and 3). Prior to issuance of the first building permit, Owner/Permittee shall assure by permit and bond the restriping of the northbound and southbound approaches on Mount Everest Boulevard to provide an exclusive left-turn lane and a shared through-right turn lane, then convert the northbound and southbound approaches from split phasing to protected left-turn phasing, satisfactory to the City Engineer. Improvements shall be completed and operational prior to first occupancy.

Table 2.4-14
Mitigated Peak Hour Intersection Level of Service – Existing plus Project

Intersection	Control	No Project		With Access Option 1				With Access Option 2				With Access Option 3			
		Avg. Delay (sec) AM/PM	LOS AM/PM	Avg. Delay (sec) AM/PM	LOS AM/PM	Change in Delay (sec) AM/PM	M?	Avg. Delay (sec) AM/PM	LOS AM/PM	Change in Delay (sec) AM/PM	M?	Avg. Delay (sec) AM/PM	LOS AM/PM	Change in Delay (sec) AM/PM	M?
9. Mt. Everest Boulevard & Balboa Avenue	Signal	73.7/ 58.7	**E/E**	37.5/ 29.5	D/C	-36.2/ -29.2	Y	Not Impacted				36.5/ 28.9	D/C	-37.2/ -29.8	Y
10. Genesee Avenue & Balboa Avenue	Signal	36.3/ 59.1	D/**E**	Not Impacted				Not Impacted				43.0/ 53.1	D/D	6.7/ -6.0	Y

NOTES:

Bold letter indicates unacceptable LOS E or F and significant impact.

LOS = Level of Service; M = Mitigated

SOURCE: Chen Ryan 2019 (Appendix I-4)

> **TRA-2: Genesee Avenue & Balboa Avenue Intersection Modifications (Access Option 3).** Prior to issuance of the first building permit, Owner/Permittee shall assure by permit and bond the ~~optimization of signal timing or~~ installation of traffic systems management (TSM) strategies (e.g., adaptive signal technology) to maximize efficiency of the existing roadway through improved signal communications and operations satisfactory to the City Engineer. Improvements shall be completed and operational prior to first occupancy.

The City's *Traffic Signal Communications Master Plan (TSCMP)* (December 2014) identifies deficient intersections throughout the City where implementation of traffic signal communications and ITS improvements could be done to improve signal communication and operations. This intersection of Genesee Avenue & Balboa Avenue is identified in the TSCMP as deficient and in need of repair. Improving signal timings could result in an increase in intersection capacity, vehicle throughput, and reduction in vehicle delays. Therefore, this impact would be reduced to a less than significant level for Access Option 3.

Roadway Segments

The segment of Balboa Avenue between Cannington Drive and Charger Boulevard is impacted by all three access options and is currently built to its ultimate classification per the currently adopted CMCP. Based on the existing land use fronting this roadway (i.e. residential and school uses) as well as right-of-way constraints, there are no feasible improvements that would expand the capacity of the roadway segment. However, the integration of ITS technology at the two City intersections would partially mitigate the project's direct impacts to roadway segments.

> **TRA-3: Cannington Drive & Balboa Avenue Intersection Modifications (All Access Options).** Prior to issuance of the first building permit, Owner/Permittee shall assure by permit and bond the installation of traffic systems management (TSM) strategies (e.g., adaptive signal technology) to maximize efficiency of the existing roadway through improved signal communications and operations satisfactory to the City Engineer. Improvements shall be completed and operational prior to first occupancy.

The implementation of adaptive signal controls along the impacted segment of Balboa Avenue~~corridor~~ as stated in **Mitigation Measure TRA-3**, as well as signal modifications at the Charger Boulevard & Balboa Avenue intersection recommended below in **Mitigation Measure TRA-~~3~~4**, would partially mitigate the project's impacts. ~~However, the County cannot assure that the City would implement adaptive signal controls along the Balboa Avenue corridor. Therefore~~

However, this impact would remain significant and unavoidable for all access options.

Near-Term plus Project

The mitigation measures described below would be required to reduce the project impact to a less-than-significant level. The effectiveness of the mitigation measures is shown in **Table 2.4-15**.

Intersections

Implementation of **Mitigation Measure TRA-1** at Mount Everest Boulevard & Balboa Avenue described under the Existing plus Project discussion would also mitigate the project's impact for all access options during the Near-Term plus Project condition.

Implementation of **Mitigation Measure TRA-2** described at Genesee Avenue & Balboa Avenue under the Existing plus Project discussion would also mitigate the project's Near-Term plus Project impact to a less-than-significant level for Access Option 3.

Implementing the following improvements at the Charger Boulevard & Balboa Avenue would reduce intersection delays to pre-project conditions and impacts would be less than significant for all access options (Table 2.4-15).

> **TRA-~~3~~4: Charger Boulevard & Balboa Avenue Intersection Modifications (~~all~~ All ~~access~~ Access ~~options~~Options).** Prior to issuance of the first building permit, Owner/Permittee shall assure by permit and bond the restriping of the northbound shared through-left turn lane into an exclusive through lane and convert the northbound and southbound signal from split phasing to protective phasing and the installation of traffic systems management (TSM) strategies (e.g., adaptive signal technology) to maximize efficiency of the existing roadway through improved signal communications and operations, satisfactory to the City Engineer. Improvements shall be completed and operational prior to first occupancy.

Table 2.4-15
Mitigated Peak Hour Intersection Level of Service – Near-Term plus Project

Intersection	Control	No Project		With Access Option 1				With Access Option 2				With Access Option 3			
		Avg. Delay (sec) AM/PM	LOS AM/PM	Avg. Delay (sec) AM/PM	LOS AM/PM	Change in Delay (sec) AM/PM	M?	Avg. Delay (sec) AM/PM	LOS AM/PM	Change in Delay (sec) AM/PM	M?	Avg. Delay (sec) AM/PM	LOS AM/PM	Change in Delay (sec) AM/PM	M?
9. Mt. Everest Boulevard & Balboa Avenue	Signal	116.5/ 64.7	**F/E**	59.9/ 27.0	**E**/C	-56.6/ -37.7	Y	58.3/ 26.6	**E**/C	-58.2/ -38.1	Y	57.6/ 26.4	**E**/C	-11.6/ -32.3	Y
10. Genesee Avenue & Balboa Avenue	Signal	41.1/ 59.2	D/**E**	Not Impacted				Not Impacted				42.0/ 57.0	D/**E**	0.9/ -2.2	Y
14. Charger Boulevard & Balboa Avenue	Signal	64.7/ 42.9	**E**/D	53.3/ 50.6	D/D	-11.4/ 7.7	Y	53.3/ 50.6	D/D	-11.4/ 7.7	Y	53.2/ 50.5	D/D	-11.5/ 7.6	Y

NOTES:

Bold letter indicates unacceptable LOS E or F and significant impact.

LOS = Level of Service; M = Mitigated

SOURCE: Chen Ryan 2019 (Appendix I-4)

Roadway Segments

The two impacted segments of Balboa Avenue, between Cannington Drive and Charger Boulevard, and between Charger Boulevard and I-805 Southbound Ramps, are currently built to their ultimate classification per the currently adopted CMCP. Based on the existing land use fronting this roadway (i.e. residential and school uses) as well as the right-of-way constraints, there are no feasible segment improvements that would expand the capacity of the roadway segment. The implementation of adaptive signal controls along the impacted segments of Balboa Avenue ~~corridor~~recommended in **Mitigation Measure TRA-3**, as well as signal modifications and adaptive signal controls at the Charger Boulevard & Balboa Avenue intersection recommended in **Mitigation Measure TRA-~~3~~ 4** would partially mitigate the project's impacts. ~~However, the County cannot assure that the City would implement adaptive signal controls along the Balboa Avenue corridor. Therefore~~However, the roadway segment impacts would remain significant and unavoidable for all access options.

Cumulative plus Project

The mitigation measures described below would be required to reduce the project impact to a less-than-significant level. The effectiveness of the mitigation measures is shown in **Table 2.4-16**.

Intersections

Implementation of **Mitigation Measure TRA-1** described under the Existing plus Project discussion would mitigate the impact at Mount Everest Boulevard & Balboa Avenue for all access options during the Cumulative plus Project traffic scenario.

Implementation of **Mitigation Measure TRA-2** described above under Existing plus Project traffic conditions would mitigate the project's Cumulative plus Project impacts to Genesee Avenue & Balboa Avenue for all access options.

~~Implementing~~ Implementation of **Mitigation Measure TRA-~~3~~ 4** described above under Near-Term plus Project discussion would reduce intersection delays at Charger Boulevard & Balboa Avenue to pre-project conditions and would reduce the Cumulative plus Project impacts to a less than significant level for all access options (Table 2.4-16).

The following additional measures would be required to partially mitigate the project's cumulative intersection impacts.

> **TRA-~~4~~5: Genesee Avenue & Clairemont Mesa Boulevard Adaptive Signal Control System (All Access Options).** Prior to issuance of the first building permit, Owner/Permittee shall pay its fair share (5.0

percent) toward ~~optimizing signal timing or~~ the cost of installing traffic systems management (TSM) strategies (e.g. adaptive signal technology) to maximize efficiency of the existing roadway through improved signal communications and operations, satisfactory to the City Engineer.

Table 2.4-16
Mitigated Peak Hour Intersection Level of Service – Cumulative plus Project

Intersection	Control	No Project		With Access Option 1				With Access Option 2				With Access Option 3			
		Avg. Delay (sec) AM/PM	LOS AM/PM	Avg. Delay (sec) AM/PM	LOS AM/PM	Change in Delay (sec) AM/PM	M?	Avg. Delay (sec) AM/PM	LOS AM/PM	Change in Delay (sec) AM/PM	M?	Avg. Delay (sec) AM/PM	LOS AM/PM	Change in Delay (sec) AM/PM	M?
1. Genesee Avenue & Clairemont Mesa Boulevard	Signal	65.9/ 95.9	**E/F**	45.6/ 60.0	D/**E**	-20.3/ -35.9	Y	45.6/ 60.0	D/**E**	-20.3/ -35.9	Y	45.6/ 60.0	D/**E**	-20.3/ -35.9	Y
8. Clairemont Drive & Balboa Avenue	Signal	65.4/ 100.6	**E/F**	63.9/ 96.5	**E/F**	-1.5/ -4.1	Y	63.9/ 96.5	**E/F**	-1.5/ -4.1	Y	63.9/ 96.5	**E/F**	-1.5/ -4.1	Y
9. Mt. Everest Boulevard & Balboa Avenue	Signal	107.9/ 110.4	**F/F**	89.6/ 53.6	**F**/D	-18.3/ -56.8	Y	86.2/ 52.3	**F**/D	-21.7/ -58.1	Y	84.7/ 52.0	**F**/D	-23.2/ -58.4	Y
10. Genesee Avenue & Balboa Avenue	Signal	42.1/ 80.2	D/**F**	49.7/ 73.1	D/**E**	7.6/ -7.1	Y	49.8/ 68.6	D/**E**	7.7/ -11.6	Y	49.8/ 68.9	D/**E**	7.7/ -11.3	Y
14. Charger Boulevard & Balboa Avenue	Signal	54.3/ 48.0	**E**/D	46.8/ 47.7	D/D	-7.5/ -0.3	Y	46.8/ 47.7	D/D	-7.5/ -0.3	Y	46.8/ 47.7	D/D	-7.5/ -0.3	Y

NOTES:

Bold letter indicates unacceptable LOS E or F and significant impact.

LOS = Level of Service; M = Mitigated

SOURCE: Chen Ryan 2019 (Appendix I-4)

TRA-~~5~~6: Clairemont Drive & Balboa Avenue Adaptive Signal Control System (All Access Options). Prior to issuance of the first building permit, Owner/Permittee shall pay its fair share (4.3 percent) toward ~~optimizing signal timing or~~the cost of installing traffic systems management (TSM) strategies (e.g. adaptive signal technology) to maximize efficiency of the existing roadway through improved signal communications and operations, satisfactory to the City Engineer.

Implementation of the ITS improvements noted above in **Mitigation Measures TRA-4 ~~5~~ 5** and **TRA-~~5~~ 6 6** would partially mitigate the project's Cumulative plus Project impact at the two study intersections listed above~~to a less-than-significant level~~ for all access options. These intersections are identified in the TSCMP as deficient and in need of repair. Improving signal timings could result in an increase in intersection capacity, vehicle throughput, and reduction in vehicle delays. However, the improvements are not fully funded at this time. ~~there is no specific mitigation program established by the City that would ensure the improvements would be implemented. Therefore, unless and until a specific mitigation program is created by the City to accommodate proportionate contributions toward the implementation of adaptive signal controls or other improvements at these locations, the County cannot assume that payment of its fair share of the mitigation improvements would reduce or avoid the project's cumulative impact at the intersections of Genesee Avenue & Clairemont Mesa Boulevard and Clairemont Drive & Balboa Avenue.~~ Therefore, Cumulative plus Project impacts to these two intersections would remain significant and unavoidable even with the fair share payments noted above.

Roadway Segments

Similar to the Existing plus Project and Near-term plus Project conditions, the impacted segment of Balboa Avenue between Charger Boulevard and I-805 Southbound Ramps is currently built to its ultimate classification per the currently adopted CMCP. Based on the existing land use fronting this roadway (i.e. residential and school uses) as well as the right-of-way constraints, there are no feasible segment improvements that would expand the capacity of the roadway segment. The implementation of adaptive signal controls at Cannington Drive & Balboa Avenue recommended in **Mitigation Measure TRA-3**~~along the Balboa Avenue corridor~~, as well as signal modifications and adaptive signal controls at the Charger Boulevard & Balboa Avenue intersection recommended in **Mitigation Measure TRA-~~3~~ 4** would partially mitigate the project's cumulative impacts. ~~However, the County cannot assure that the City would implement adaptive signal controls along the Balboa Avenue corridor. Therefore~~However, this Cumulative plus Project roadway segment impact would remain significant and unavoidable for all access options.

Mount Etna Drive is currently built to its ultimate classification per the currently adopted CMCP. Based on the classification of this roadway, there is insufficient right-of-way and street parking removal limitations that would prevent any improvements to the capacity of the impacted roadway segment. Therefore, this Cumulative plus Project impact would remain significant and unavoidable for Access Option 1.

2.4.6 Significance of Impacts After Mitigation

The significance of intersection and roadway segment impacts after implementation of mitigation measures is summarized in **Table 2.4-17**. As shown in the table, proposed mitigation measures would reduce all direct intersection impacts identified for the Existing plus Project and Near-Term plus Project traffic scenarios to less-than-significant levels. Two intersection impacts would remain significant and unavoidable in the Cumulative plus Project traffic scenario for all access options:

1. Genesee Avenue & Clairemont Mesa Boulevard
8. Clairemont Drive & Balboa Avenue

Significant and unavoidable impacts were identified for one roadway segment in the Existing plus Project traffic scenario, and two roadway segments in the Near-Term plus Project and Cumulative plus Project traffic scenarios.

2.4.8 Conclusions

The proposed project would not result in impacts related to traffic hazards, circulation movements and alternative transportation, and VMT. Direct and cumulative impacts would occur related to trip generation and capacity.

Project impacts to study intersections and roadway segments would occur during Existing plus Project (**Impact ~~TIA~~TRA-1**), which would be mitigated or partially mitigated by **Mitigation Measures TRA-1, ~~and~~ TRA-2 and TRA-3**. However, even with the implementation of **Mitigation Measure TRA-3**, significant and unavoidable roadway segment impacts would remain along Balboa Avenue.

Project impacts to study intersections and roadway segments would also occur as a result of the various access options during Near-term plus Project (**Impact ~~TIA~~TRA-2**), which would be mitigated or partially mitigated by **Mitigation Measures TRA-1, TRA-2, TRA-3 and TRA-~~3~~4**. However, even with the implementation of Mitigation Measures TRA-3 and TRA-4, significant and unavoidable roadway segment impacts would remain along Balboa Avenue.

Project impacts to study intersections and roadway segments would also occur as a result of the various access options during Cumulative plus Project (**Impact**

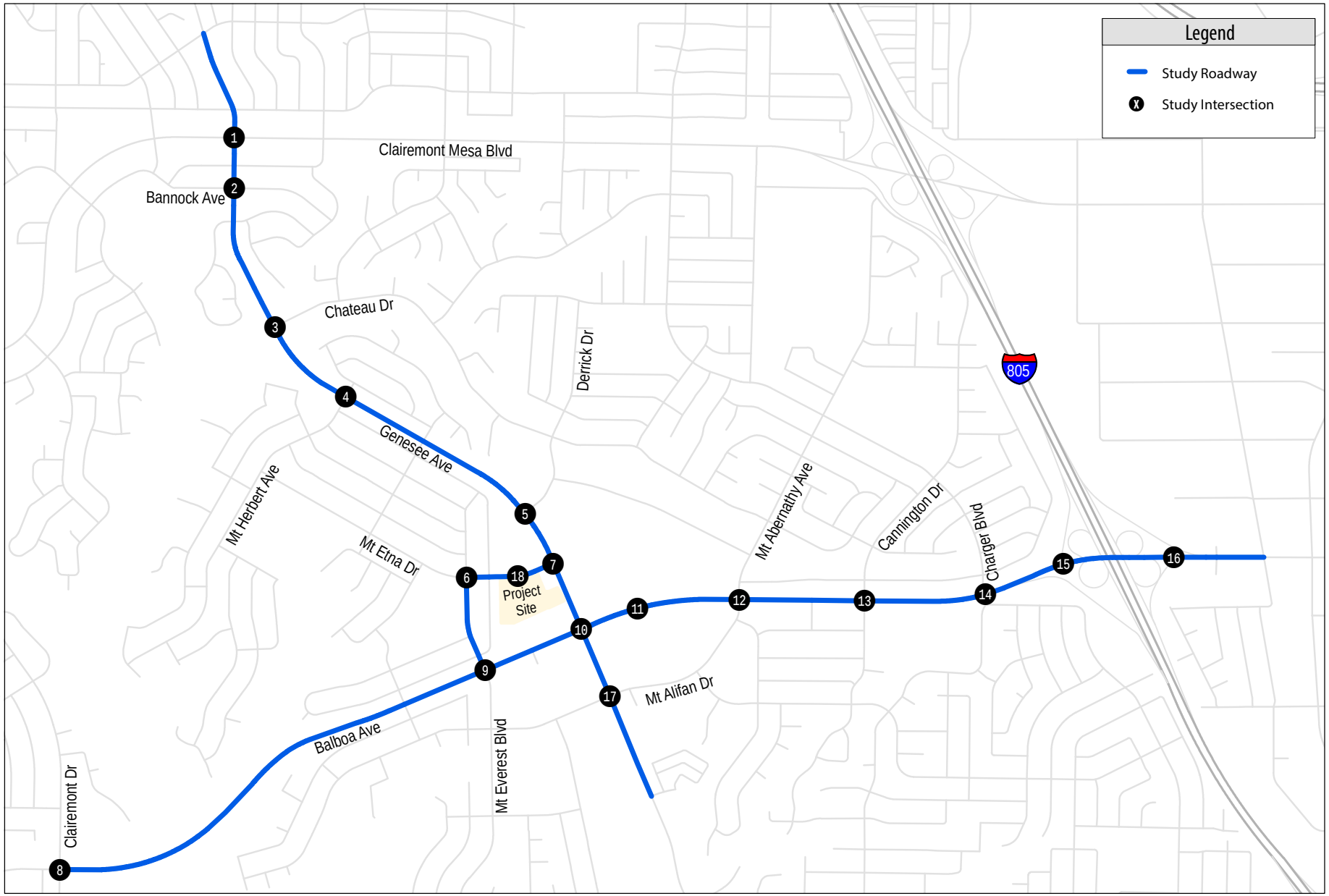
~~**TIA**~~**TRA-3**), which would be mitigated or partially mitigated by **Mitigation Measures TRA-1, TRA-2, ~~and~~ TRA-3, TRA-4, TRA-5 and TRA-6**. However, significant and unavoidable impacts would remain at two intersections and two roadway segments along Mount Etna Drive and Balboa Avenue because ~~**Mitigation Measures TRA-4 and TRA-5** cannot be assured by the County and~~ there are no other feasible improvements that can be implemented ~~for the impacted roadway segments~~.

Table 2.4-17
Level of Significance after Mitigation

Impact Location	Existing plus Project			Near-Term plus Project			Cumulative plus Project		
	Access Option 1	Access Option 2	Access Option 3	Access Option 1	Access Option 2	Access Option 3	Access Option 1	Access Option 2	Access Option 3
Intersections									
1.Genesee Avenue & Clairemont Mesa Boulevard	NI	NI	NI	NI	NI	NI	SU~~2~~	SU~~2~~	SU~~2~~
8.Clairemont Drive & Balboa Avenue	NI	NI	NI	NI	NI	NI	SU~~2~~	SU~~2~~	SU~~2~~
9.Mount Everest Boulevard & Balboa Avenue	LTS	NI	LTS	LTS	LTS	LTS	LTS	LTS	LTS
10.Genesee Avenue & Balboa Avenue	NI	NI	LTS	NI	NI	LTS	LTS	LTS	LTS
14.Charger Boulevard & Balboa Avenue	NI	NI	NI	LTS	LTS	LTS	LTS	LTS	LTS
Roadway Segments									
11.Mount Etna Drive, between Mount Everest Boulevard and Genesee Avenue	NI	NI	NI	NI	NI	NI	SU~~1~~	NI	NI
17.Balboa Avenue, between Cannington Drive and Charger Boulevard	SU~~2~~	SU~~2~~	SU~~2~~	SU~~2~~	SU~~2~~	SU~~2~~	NI	NI	NI
18.Balboa Avenue, between Charger Boulevard and I-805 Southbound Ramps	NI	NI	NI	SU~~2~~	SU~~2~~	SU~~2~~	SU~~2~~	SU~~2~~	SU~~2~~

NOTES:

NI = No Impact; LTS = Impact would be less than significant after mitigation;
SU~~1~~ = Impact would remain significant and unavoidable because ~~no feasible mitigation improvement~~ only partial is ~~available~~feasible;
~~SU2 = Impact would remain significant and unavoidable because mitigation cannot be assured by the County~~



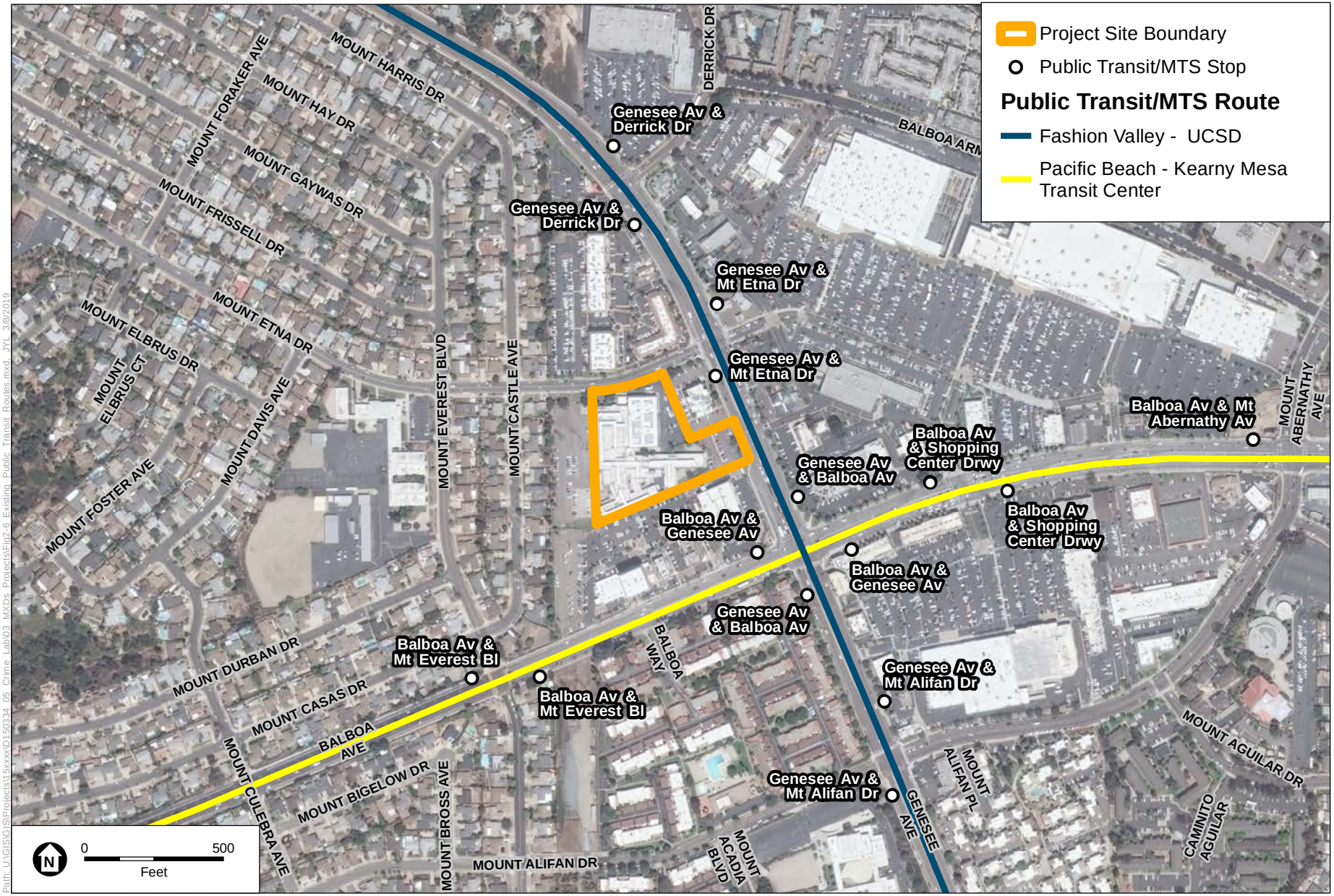
SAN15XXX\D150334.00 - County of San Diego General Services As-Needed\02 Active Tasks\D150334.05 -Crime Lab AH\05 Graphics-GIS-Modeling\Illustrator

SOURCE: Chen Ryan, 2019

Mount Etna Community Plan Amendment and Rezone Project

Figure 2.4-1
Traffic Study Area

ESA



SOURCE: SanGIS, 2018.

Mount Etna Community Plan Amendment and Rezone Project

Figure 2.4-2

Existing Public Transit/MTS Routes

ESA

CHAPTER 3.0 ENVIRONMENTAL EFFECTS FOUND NOT TO BE SIGNIFICANT

This chapter of the EIR discusses effects that were identified as not to be significant. These sections include 3.1 Aesthetics, 3.2 Energy, 3.3 Greenhouse Gas Emissions, 3.4 Land Use and Planning, 3.5 Population and Housing, 3.6 Public Services, 3.7 Recreation, and 3.8 Utilities and Service Systems.

Each environmental issue area describes the following topics.

- Existing conditions
- Regulatory framework
- Analysis of project effects and determination as to significance
- Cumulative impacts
- Conclusion

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3.1 Aesthetics

This section provides an assessment of potential impacts related to aesthetics and visual resources that could result from implementation of the proposed project. Potential impacts addressed in this section include impacts to scenic vistas, degradation of visual character, creation of a new source of light or glare, visual incompatibility with surrounding development, loss of distinctive trees, or a substantial change in the existing landform.

Comments related to aesthetics received during the public comment period for Notice of Preparation (NOP) included concerns regarding the maximum allowable height, shade and/or shadow of adjacent properties, incompatibility with surrounding development, new light and glare sources, spillover light pollution, and negative impacts on existing community character within Clairemont Mesa. These concerns have been considered and addressed, as applicable, in the following evaluation of the project's potential to impact aesthetics. The NOP and all comment letters received in response to the NOP are included in Appendix A of this EIR.

3.1.1 Existing Visual Landscape

The project site is located at the intersection of Genesee Avenue and Mount Etna Drive in the Clairemont Mesa community. The project site is surrounded by a mixture of commercial and residential development, with an assortment of commercial land uses and neighborhood amenities within a 0.5-mile radius of the project site. Figure 1-2 shows the existing land uses in the vicinity of the project site. **Figure 3.1-1** shows two views from north and south of the project site, showing the general commercial character of the project's vicinity. The project site is bound by Mount Etna Drive to the north of the project site with one- and two-story commercial and medical buildings further north (Viewpoint 1 on Figure 3.1-1). The project site is bound to the east by a three-story medical office building, with Genesee Avenue and a commercial shopping center located further east. South of the project site are commercial and medical office buildings ranging from one- to ten-stories, and their associated surface parking lots (Viewpoint 2 on Figure 3.1-1). A San Diego Gas and Electric (SDG&E) easement that currently serves as a parking lot for the previous use of the project site is located to the west of the project site, which also includes overhead power transmission lines. Single-story single-family residential uses are located further west of the SDG&E easement.

The project site is currently developed with the former San Diego County Regional Crime Lab (Crime Lab) facility. Existing structures onsite include a one-story, 66,000-square-foot (SF) building in the center of the project site, a 1,500 SF garage on the southwestern portion of the project site, and a two-story 36,000 SF warehouse building on the northeastern portion of the project site.

Two unconnected surface parking lots are located to the east of the Crime Lab buildings, one accessed from Genesee Avenue and the other from Mount Etna Drive. The project site includes minimal ornamental landscaping adjacent to the building along Mount Etna Drive and in courtyards on the eastern portion of the project site.

3.1.1.1 Views of the Project Site

Public views of the project site are available to motorists, cyclists, and pedestrians traveling along Mount Etna Drive, Genesee Avenue, and Balboa Avenue. An aerial map of key public views (Viewpoints 3 through 7) of the project site are shown in **Figure 3.1-2**.

Viewpoint 3 (shown on **Figure 3.1-3**) shows the view of the project site from the northeast looking southwest at the intersection of Genesee Avenue and Mount Etna Drive. From this intersection, existing views include the three-story medical office building located east of the project site, along with street trees along Mount Etna Drive largely screening the project site. The two-story Crime Lab building is partially visible behind street trees.

Viewpoint 4 (also shown on Figure 3.1-3) has views of the project site from the southeast. Viewpoint 4 is from the intersection of Balboa Avenue and Genesee Avenue looking northwest. Views of the project site are completely obstructed from Viewpoint 4, with the intersection in the foreground and the one-story, ten-story, and seven-story commercial buildings in the background obstructing the project site.

Viewpoint 5 is shown on **Figure 3.1-4**, showing the view of the project site from Balboa Avenue looking north. Existing views of the project site are largely screened by the one-story and ten-story commercial buildings. A portion of the existing one-story Crime Lab building is visible in between the commercial buildings, slightly obstructed from view due to street trees and the commercial building's associated surface parking lot.

Viewpoint 6 (Figure 3.1-4) includes the view of the project site from Mount Etna Drive looking southeast. The driveway entrance to the SDG&E easement is in the foreground, with the two-story Crime Lab building visible behind existing street trees.

Viewpoint 7 is shown on **Figure 3.1-5**, which is a view of the project site from Mount Davis Avenue west of the project site looking east. The project site is completely obstructed from view due to intervening single-family, one-story residential homes.

3.1.1.2 Neighborhood Visual Character

The Clairemont Mesa Community Plan (CMCP) describes the community as an attractive place to live, work and play because of the community's many attributes, including the visual aesthetics of the community's nearby canyons in an urban environment, which has contributed to the community's sense of place (City of San Diego 2011). The Community Plan lists distinctive features of the community as including low-density residential development adjacent to canyons and parks, and trees planted in the street medians and along sidewalks.

The project site is located along the western edge of the Community Core area of the larger Clairemont Mesa Community Planning Area. According to the CMCP, the Community Core area is the focal point of the community and provides commercial services within walking distances of residential neighborhoods. The Community Core area includes the project site and both the Balboa Mesa and Genesee Plaza shopping centers, located southeast and east of the project site, respectively. According to the CMCP, these centers are in fair condition and are underutilized with one-story buildings surrounded and separated by expansive parking and vacant land. The surrounding commercial development adjacent to and south of the project site includes the Balboa Towers, which are two medical buildings that are seven and ten stories in height. In addition, one-, two-, and three-story commercial buildings are located north and east of the project site. As previously detailed, the 50-foot SDG&E easement is located west of the project site, with single-family residential homes located further west of the easement.

3.1.1.3 Scenic Vistas

The City's General Plan and the CMCP do not include any formal designation of scenic vistas within the community. However, the CMCP states that many of the neighborhoods along the mesa area overlook Mission Bay and the Pacific Ocean to the west, Fortuna Mountain and Cowles Mountain to the east and the open space canyon system contain scenic vistas (City of San Diego 2011). To protect some of these views, the Clairemont Mesa Height Limitation Zone was established in 1989, maintaining a 30-foot height limit throughout the majority of the community. The project site itself does not feature any scenic resources or scenic views, such as to mountains, canyons, bays, or the Pacific Ocean.

3.1.1.4 Shade and Shadow

Shading from buildings and structures has the potential to block sunlight on adjacent properties. Although shading is common and expected in urban areas and can be considered a beneficial feature when it provides protection from excess sunlight and heat, shading can have an adverse impact if it interferes with activities that rely on sunlight to function properly, or to provide physical comfort, or to support commercial activity. Such uses include routinely usable outdoor

spaces associated with residential, recreational, and institutional uses (e.g., schools, convalescent homes), commercial pedestrian-oriented outdoor eating areas or other spaces, operations such as nurseries and solar collectors. The existing project site consists of one- and two-story buildings, which, due to their height, do not extend substantial shade or shadows onto offsite properties.

3.1.1.5 Light and Glare

Light introduction can be a nuisance to adjacent residential areas, diminish the view of the clear night sky, and if uncontrolled, can cause disturbances for motorists traveling in the area. Residences are considered light sensitive since occupants have expectations of privacy during evening hours and may be subject to disturbances by bright light sources. Light spill is typically defined as the presence of unwanted light on properties adjacent to a property being illuminated. Existing sources of light are present on the project site including existing street lamps in the surface parking lot and exterior security lighting on the existing building The area surrounding the project site consists of developed land with commercial, office, and residential uses, which emit nighttime light typical of an urban community. Off-site sources of night lighting include street lighting along Mount Etna Drive, Genesee Avenue, Balboa Avenue, and lighting within the adjacent SDG&E easement parking lot. In addition, the surrounding area includes illuminated street signage, commercial lighting from adjacent shopping centers, and vehicular lights from cars along adjacent roadways.

Glare is caused by the reflection of sunlight or artificial light by highlight polished surfaces such as windows or reflective materials and, to a lesser degree, from broad expanses of light-colored surfaces or vehicle headlights. Perceived glare is unwanted and potentially objectionable sensation as observed by a person as they look directly into the light source of a luminaire. Daytime glare generation in urban areas is typically associated with building with exterior facades largely or entirely comprised of highly reflective glass. Glare can also be produced during evening and nighttime hours by the reflection of artificial light sources, such as automobile headlights. Glare generation is typically related to either moving vehicles or sun angles, although glare resulting from reflected sunlight can occur regularly at certain times of the year. Glare-sensitive uses include residences and transportation corridors. The project site currently does not generate glare, as the existing building is made up of non-reflective materials without large expanses of glass.

3.1.2 Regulatory Setting

Federal

There are no federal regulations related to aesthetics.

State

California Scenic Highway Program

California adopted a Scenic Highway Program (Streets and Highways Code, Section 260 et seq,) in 1963 to preserve and protect scenic highway corridors from change that would diminish the visual quality of areas that are adjacent to highways. The scenic designation is based on the amount of natural landscape visible by motorists, the scenic quality of the landscape, and the extent to which development intrudes upon the motorist's enjoyment of the view.

Local

City of San Diego General Plan

The General Plan includes citywide design goals and policies regarding visual elements that complement the goals for pedestrian-oriented and walkable villages from the City of Villages strategy. A village environment includes high-quality public spaces, civic architecture, and the enhancement of visual quality of all types of development.

The Urban Design Element of the General Plan establishes a set of design principles from which future physical design decisions can be based. Policies call for respecting San Diego's natural topography and distinctive neighborhoods, providing public art, and encouraging the development of walkable, transit-oriented communities.

In its introduction, the Urban Design Element of the General Plan states:

> *As the availability of vacant land becomes more limited, designing infill development and redevelopment that builds upon our existing communities becomes increasingly important. A compact, efficient, and environmentally sensitive pattern of development becomes increasingly important as the City continues to grow. In addition, future development should accommodate and support existing and planned transit service (City of San Diego 2008).*

The General Plan Urban Design Element policies involve architectural and landscape elements, as well as the design of transit, parking, and residential. This element also contains policies related to public spaces and cultural amenities that contribute to the character of neighborhoods. Section 3.4 of this EIR, Land Use and Planning, analyzes the project's consistency with the General Plan's policies, including the Urban Design Element.

Clairemont Mesa Community Plan

The CMCP includes an Urban Design Element that identifies Clairemont Mesa's distinctive image and how this image can be preserved and translated into the built environment. The CMCP states that the community's distinctive attributes include the well-established single-family neighborhoods, low-scale character adjacent to canyons and parks, and a park setting with trees planted in street medians and along sidewalks. To protect the low-scale character of the community as well as vistas to Mission Bay and the Pacific Ocean, the Clairemont Mesa Height Limitation Zone was established in 1989, maintaining a 30-foot height limit throughout the majority of the community. The CMCP notes that with the lack of significant undeveloped land in the community, changes in housing will undoubtedly occur by the replacement of existing housing with new housing, probably at higher densities. In January 2017, the City initiated a comprehensive update to the CMCP, which is currently ongoing and is expected to allocate more residential housing to the community.

City of San Diego Municipal Code

The San Diego Municipal Code (SDMC) includes several regulations related to aesthetics and design, including but not limited to regulations on height (Section 131.0431); building setbacks (Section 131.0431); landscaping, planting, and irrigation standards (Section 142.0404, Section 142.0409, and Section 142.0403); and screening and fencing requirements (Section 142.0910).

3.1.3 Analysis of Project Effects and Determination as to Significance

For purposes of this EIR, the identified significance thresholds are based on criteria provided in the City of San Diego's CEQA Significance Determination Thresholds (City of San Diego 2016). Accordingly, a significant aesthetics impact would occur if the project would:

> Issue 1: Result in a substantial obstruction of any vista or scenic view from a public viewing area as identified in the community plan;
>
> Issue 2: Result in the creation of a negative aesthetic site or project;
>
> Issue 3: Result in project bulk, scale, materials, or style which would be incompatible with surrounding development;
>
> Issue 4: 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. Note for substantial alteration to occur, new development would have to be of a size, scale, or design that would markedly contrast with the character of the surrounding area;

Issue 5: Result in the loss of any distinctive or landmark tree(s), or stand of mature trees as identified in the community plan;

Issue 6: Result in substantial change in the existing landform;

Issue 7: Result in substantial light or glare which would adversely affect daytime or nighttime views in the area.

3.1.3.1 Scenic Views and Vistas

Issue 1: Would the project result in substantial obstruction of any vista or scenic view from public viewing areas identified in the community plan?

Impact Analysis

Community Plan Amendment and Rezone and Site Demolition and Preparation

The proposed project includes an amendment to the CMCP and a rezone that would allow for a future development on the project site, including a maximum of 404 residential units with a height of up to 70 feet. In addition, the project would include site demolition and preparation activities. As previously detailed above, the City's General Plan and the CMCP do not include any formal designation of scenic vistas within the community. However, the CMCP states that many of the neighborhoods along the mesa area overlook Mission Bay and the Pacific Ocean to the west, Fortuna Mountain and Cowles Mountain to the east, and the open space canyon system. The project site itself does not feature any scenic views or contain other scenic resources, such as mountains, canyons, bays or the Pacific Ocean. The proposed project is located approximately 0.8 miles east of Tecolote Canyon, and approximately 4.5 miles east of the Pacific Ocean and Mission Bay. Due to the topography and distance, the project site is not within direct line of sight of Tecolote Canyon, Mission Bay, or the ocean. Therefore, there would be no impacts to scenic vistas with implementation of the proposed project, including both the future development and site demolition and preparation activities.

3.1.3.4 Adverse Effects to Visual Character

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

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?

Impact Analysis

Community Plan Amendment and Rezone

The project site is currently occupied by the existing one- and two-story Crime Lab facility and associated surface parking lots. The Community Plan Amendment (CPA) and rezone of the project site would allow for the future development of a maximum of 404 residential units with a height of up to 70 feet. While the exact design of the future development is unknown at this time, the proposed Community Plan Implementation Overlay Zone (CPIOZ) Type A (CPIOZ-A) supplemental development regulations included in Appendix B of this EIR provide aesthetic regulations that would guide the design of the future development. Specifically, those regulations include, and are not limited to:

1) Community accessible active ground floor space oriented towards the fronting public streets;

2) Building setbacks intended to encourage pedestrian scale and compatibility with adjacent uses;

3) Landscape screening of any surface parking directly adjacent to public rights-of-way;

4) Landscaping of the project site, and the planting of street trees along public street frontages to provide a shaded pedestrian environment;

5) Building articulation that diminishes the appearance of mass and bulk, and that creates visual interest as viewed at the pedestrian scale;

6) Screening and fencing of storage areas, ground-level and rooftop mechanical equipment, and maintenance areas; and

7) Residential open space, including: private (balcony, patio, or roof terrace) exterior open space.

The project site is currently developed with typical office buildings that feature a minimum of articulation, landscaping, and urban design features. The proposed project would replace the existing building with new buildings with high quality architecture and articulation, along with pedestrian facilities, and landscaping and open space. The design of the future development would be subject to the standards in the CPIOZ-A and reviewed for compliance during the building permit process. In addition, the existing community does not have an established architectural theme, and therefore the proposed project would not be deviating from an established thematic character. While the height of the future on-site structure would be increased from one and two-story buildings to a maximum height of 70 feet, the proposed height would be consistent with the two existing

Balboa Towers that are located south of the project site, which are seven-stories and ten-stories in height. In addition, as the future development would be an affordable housing project, the development would be allowed to exceed the community's 30-foot height limit overlay, in accordance with the SDMC Section 101.0452.5.D. Although implementation of the proposed project would include new development that would change the use and visual characteristics of the project site, it would not substantially degrade the surrounding visual character or quality. As such, the proposed project would not result in the creation of a negative aesthetic site or project and would not result in substantial alteration to the existing character of the area. Therefore, impacts would be less than significant.

Site Demolition and Preparation

In addition to the CPA and a rezone of the project site, the proposed project also includes the demolition of the existing unoccupied buildings and related facilities on-site, disposal of the demolition debris, mass grading of the site, and existing utilities stubbed out to the project site boundary. Site demolition and preparation activities would include the temporary presence and use of heavy machinery including, but not limited to large trucks, bulldozers, and a construction staging area. However, construction activities are considered a temporary, short-term visual affect. Therefore, site demolition and preparation activities would not result in the creation of a negative aesthetic or result in a substantial alteration to the existing or planned character of the area, and impacts would be less than significant.

3.1.3.5 Incompatible with Surrounding Development

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

Impact Analysis

Community Plan Amendment and Rezone

As previously detailed, the proposed project would allow for the future development of a maximum of 404 residential units with a height of up to 70 feet. While the exact design of the future development is unknown at this time, the proposed CPIOZ-A supplemental development regulations included in Appendix B of this EIR provide urban design regulations applicable to the future residential development. These regulations include building setbacks, landscape and streetscape regulations, and building articulation standards to diminish overall mass of buildings and create variation from an exterior perspective. While building materials and style are unknown at this time, the project would be subject to the standards in the CPIOZ-A and reviewed for compliance during the

building permit process, which would ensure building materials and styles compatible with the surrounding development. In addition, the existing community does not have an established architectural theme, and therefore the proposed project would not be deviating from an established thematic character.

While the height of the structures on site would be increased from one and two-story buildings to a maximum height of 70 feet the proposed height would be consistent with the two existing Balboa Towers that are located south of the project site, which are seven stories and ten stories in height. Due to the proposed height of the future development, a shade and shadow analysis was completed to determine the future development's resulting shadows to determine incompatibility with the surrounding development.

As previously detailed, the consequences of shadows on land uses can be positive, including cooling effects during warm weather; or negative, such as loss of warmth during cooler weather and loss of natural light for landscaping and human activity. In order to determine the extent of any negative shading impacts on surrounding development, shading diagrams were prepared to demonstrate the extent shadows would be generated by the proposed project, assuming compliance with the CPIOZ-A supplemental development regulations. **Figure 3.1-6** shows the shade and shadow projections the project could produce during the winter solstice (December 21), when sun angles are angles are lowest, and shadows are at their longest. As shown in this figure, shadows from the project site would largely be cast onto surrounding streets, including Mount Etna Drive, Genesee Avenue, and the adjacent SDG&E easement. Shadows would be cast onto the three-story medical building east of the project site and onto a portion of the commercial buildings north of the project site. However, these shadows would largely be cast on driveways, parking lots, and ornamental landscaping fronting the buildings, where shadows would not interfere with pedestrians congregating or on uses that rely on sunlight. **Figure 3.1-7** shows the shadow projections during the spring equinox (March 21), which shows that shadows would largely be cast onto the SDG&E easement, Mount Etna Drive, and Genesee Avenue. The medical building east of the project site would have shadows cast on the structure, however, the shadows would be cast at various times and locations throughout the day. **Figure 3.1-8** shows the shadow projections during the summer solstice (June 21), when shadows are at their shortest. As shown on this figure, shadows would be cast onto the SDG&E easement and Genesee Avenue. Shadows would be cast on the medical building east of the project site only in the evening. **Figure 3.1-9** shows shadow projections during the fall equinox (September 21). Similar to Figure 3.1-7, shadows would largely be cast onto the SDG&E easement, Mount Etna Drive, and Genesee Avenue. The medical building east of the project site would have shadows cast on the structure, however, the shadows would be cast at various times and locations throughout the day. While shadows would be cast onto a

portion of the surrounding development, the shadows would not be cast on areas that rely on sunlight to function properly, such as pedestrian-oriented outdoor eating areas, schools, nurseries, or solar collectors.

With implementation of the proposed supplemental development regulations included in Appendix B of this EIR, the design of the future development would not be incompatible with the bulk, scale, materials, or style with the surrounding development. In addition, impacts associated with shade and shadow of the future development would not be visually incompatible with surrounding uses and character of the project area. Therefore, impacts would be less than significant.

Site Demolition and Preparation

Site demolition and preparation activities would include the temporary presence and use of heavy machinery including, but not limited to large trucks, bulldozers, and a construction staging area. However, construction activities are considered a temporary, short-term visual affect. Therefore, site demolition and preparation activities would not result in visual incompatibility with surrounding uses, and impacts would be less than significant.

3.1.3.6 Loss of Existing Visual Features

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?

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

Impact Analysis

Community Plan Amendment and Rezone and Site Demolition and Preparation

The project site currently includes the vacant Crime Lab building, associated surface parking lots, and minimal ornamental landscaping adjacent to the building along Mount Etna Drive and in courtyards on the eastern portion of the project site. No distinctive or landmark trees or stand of mature trees currently exist on the project site. Therefore, implementation of the proposed project, including both the future residential development and site demolition activities, would not result in the loss of distinctive trees, and impacts would be less than significant.

The site demolition and preparation activities would deliver a rough graded pad for future development. The graded pad would include a maximum two percent slope to ensure that the pad drains correctly. Site preparation activities would include approximately 1,200 cubic yards of soil exported. According to the City of San Diego's CEQA Significance Determination Thresholds (City of San Diego 2016), projects that are considered to significantly alter the natural landform

would include altering more than 2,000 cubic yards of earth. Therefore, with implementation of the proposed project, no substantial change in the existing landform would occur, and impacts would be less than significant.

3.1.3.3 New Sources of Light and Glare

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

Impact Analysis

Community Plan Amendment and Rezone

The introduction of light can be a nuisance to adjacent residential areas and can diminish the view of the night sky. Currently, the project site consists of the Crime Lab facility, which includes existing street lamps in the surface parking lot and exterior security lighting on the existing buildings. The area surrounding the project site consists of developed land with commercial and residential uses, which emit nighttime light typical of an urban community. Implementation of the proposed project would result in the addition of potential lighting sources associated with the future residential development, including lighting from residential units, vehicular traffic, and parking lot lighting. While the proposed project would result in the addition of lighting sources, there are existing light sources already occurring on and surrounding the project site. Nighttime views near the project site already include existing urban light pollution, and the contribution from the project site would be minimal. Additionally, all lighting installed would be in compliance with the SDMC Section 142.0740 Outdoor Lighting Regulations. Therefore, the future development would not result in substantial new light sources, and impacts would be less than significant.

Daytime glare is typically caused by the reflection of sunlight or artificial light from highly polished surfaces, such as window glare or reflective materials. The project site currently does not generate glare, as the existing building is made up of non-reflective materials without large expanses of glass. While the design of the future development is unknown at this time, residential buildings typically use non-reflective building materials, such as stucco, wood, or stone veneer. While building materials are unknown at this time, the project would be subject to the standards in the CPIOZ-A and reviewed for compliance during the building permit process. In compliance with the SDMC Section 142.0730, the proposed project would be required to have less than 50 percent of the building's exterior comprised of reflective material that has a light reflectivity factor greater than 30 percent. Therefore, impacts related to glare would be less than significant with implementation of the proposed project.

Site Demolition and Preparation

Site demolition and preparation activities would include the presence and use of heavy machinery including, but not limited to large trucks, bulldozers, and a construction staging area, which would not include large amounts of lighting or reflective materials. No nighttime lighting is anticipated for the proposed project. Construction activities are considered a temporary, short-term visual affect. Therefore, site demolition and preparation activities would not result in substantial light or glare that would adversely affect daytime or nighttime views in the area.

3.1.4 Cumulative Impact Analysis

The geographic context for the analysis of cumulative impacts with regards to visual character and quality, and creation of substantial light and glare are public views of the project site and surrounding areas. The approved or planned cumulative projects within the surrounding area include commercial, residential, and educational land uses. The proposed project, when considered with other projects in the cumulative area, could have the potential to change the visual character of the surrounding area. However, because the area surrounding the project site is existing residential and commercial uses, the visual character or quality of the project site and surrounding area would not be substantially degraded. The proposed project would be consistent with the existing height of existing buildings to the south and would be required to adhere to proposed CPIOZ-A supplemental development regulations included in Appendix B of this EIR. Therefore, when considered with other projects, the project's incremental contribution to impacts on visual character or quality would not be cumulatively considerable.

While the proposed project would include daytime and nighttime exterior light in the form of residential lighting and headlights, the proposed project would be in compliance with applicable light and glare regulations. The proposed project, when considered with other projects, could have the potential to result in substantial light and glare impacts. However, the proposed project and the cumulative projects would be required to comply with the City's existing lighting and glare regulations. Therefore, the project's incremental contribution to impacts on light and glare would not be cumulatively considerable.

3.1.5 Significance of Impacts Prior to Mitigation

Impacts related to aesthetics and visual resources would be less than significant.

3.1.6 Mitigation

No mitigation measures are required.

3.1.7 Conclusion

Due to the topography and distance, the project site is not within direct line of sight of mountains, canyons, bays, or the Pacific Ocean. Therefore, impacts to scenic vistas with implementation of the proposed project, including both the future development and site demolition and preparation activities, would be less than significant.

Although implementation of the proposed project would include new development that would change the use and height ~~visual characteristics~~ of the project site, it would not substantially degrade the surrounding visual character or quality. As such, the proposed project would not result in the creation of a negative aesthetic site or project and would not result in substantial alteration to the existing character of the area, such as a subdivision in a previously undeveloped area.

With implementation of the proposed CPIOZ-A supplemental development regulations included in Appendix B of this EIR, the design of the future development would not be incompatible with the bulk, scale, materials, or style with the surrounding development. In addition, impacts associated with shade and shadow of the future development would not be incompatible with surrounding uses.

Implementation of the proposed project would result in the addition of potential lighting sources. However, the proposed project would be in compliance with the SDMC related to lighting and glare. Therefore, impacts related to aesthetics and visual resources would be less than significant.

Viewpoint #1: Existing view of the project site from the northwest looking south

Viewpoint #2: Existing view of the project site from the southwest looking northeast

150334.05

SOURCE: ESA, 2019

Mount Etna Community Plan Amendment and Rezone Project

Figure 3.1-1
General Vicinity Viewpoints

ESA

SOURCE: Google Earth, 2019; ESA, 2019.

Mount Etna Community Plan Amendment and Rezone Project

Figure 3.1-2
Key Viewpoint Locations

ESA

Viewpoint #3: Existing view of the project site from the northeast looking southwest

Viewpoint #4: Existing view of the project site from the southeast looking northwest

150334.05

SOURCE: ESA, 2019

Mount Etna Community Plan Amendment and Rezone Project

Figure 3.1-3
Existing Views - Viewpoints 3 and 4

ESA

Viewpoint #5: Existing view of the project site from the south looking north

Viewpoint #6: Existing view of the project site from the northwest looking southeast

150334.05

SOURCE: ESA, 2019

Mount Etna Community Plan Amendment and Rezone Project

Figure 3.1-4
Existing Views - Viewpoints 5 and 6

ESA

Viewpoint #7: Existing view of the project site from the west looking east

150334.05

SOURCE: ESA, 2019

Mount Etna Community Plan Amendment and Rezone Project

Figure 3.1-5
Existing View - Viewpoint 7

ESA

SAN\15XXX\D150334.00 - County of San Diego General Services As-Needed\02 Active Tasks\D150334.05 -Crime Lab AH\05 Graphics-GIS-Modeling\Illustrator

SOURCE: ESA, 2019; Basemap Google Earth, 2019

Mount Etna Community Plan Amendment and Rezone Project

Figure 3.1-6
Winter Solstice (December 21) Shadows

ESA

SAN\15XXX\D150334.00 - County of San Diego General Services As-Needed\02 Active Tasks\D150334.05 -Crime Lab AH\05 Graphics-GIS-Modeling\Illustrator

SOURCE: ESA, 2019; Basemap Google Earth, 2019

Mount Etna Community Plan Amendment and Rezone Project

Figure 3.1-7
Spring Equinox (March 21) Shadows

ESA

SAN\15XXX\D150334.00 - County of San Diego General Services As-Needed\02 Active Tasks\D150334.05 -Crime Lab AH\05 Graphics-GIS-Modeling\Illustrator

SOURCE: ESA, 2019; Basemap Google Earth, 2019

Mount Etna Community Plan Amendment and Rezone Project

Figure 3.1-8
Summer Solstice (June 21) Shadows

ESA

SOURCE: ESA, 2019; Basemap Google Earth, 2019

Mount Etna Community Plan Amendment and Rezone Project

Figure 3.1-9
Fall Equinox (September 21) Shadows

ESA

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3.2 Energy

This section analyzes impacts on energy resources due to construction and operation of the project. This section provides a summary of the project's anticipated energy needs, impacts, and conservation measures. Information found herein, as well as other aspects of the project's energy implications, are discussed in greater detail elsewhere in this EIR, including in Chapter 1.0, Project Description, Location, and Environmental Setting, and Sections 2.1, Air Quality; 2.4, Transportation and Traffic; 3.3, Greenhouse Gas Emissions; and 3.4, Land Use and Planning.

There were no comments related to energy received during the public comment period for the Notice of Preparation (NOP). The NOP and all comment letters received in response to the NOP are included in Appendix A of this EIR.

3.2.1 Existing Conditions

3.2.1.1 Electrical Energy

San Diego Gas & Electric (SDG&E) is the electricity provider for the project area. SDG&E, a Sempra Energy Utility, is a regulated public utility that provides electrical services to approximately 3.6 million people in 25 communities and two counties (San Diego and southern Orange counties) over its 4,100-square-mile service area (SDG&E 2019). In 2017, SDG&E's total electricity sales in the County of San Diego was estimated to be 19,346 gigawatt hours (GWh) (CEC 2018a).

SDG&E produces and purchases their energy from a mix of conventional and renewable generating sources. **Table 3.2-1** shows the electric power mix that was delivered to retail customers for SDG&E compared to the statewide power mix for 2017, the most recent year in which data is available. Total electricity sales/usage for SDG&E is shown in Table 3.2-1 compared to the statewide electricity sales/usage from the most recent year for which data is available.

3.2.1.2 Natural Gas Supply

Natural gas is used for cooking, space heating, water heating, electricity generation, and as an alternative transportation fuel. SDG&E is responsible for providing natural gas supply to the project. In 2013, SDG&E's total natural gas sales in the County of San Diego was estimated to be 480 million therms or 47.9 trillion BTU (CEC 2018b).

Table 3.2-1
Electric Power Mix Delivered to Retail Customers in 2017

Energy Resource	2017 SDG&E (Percent)	2017 CA Power Mix (for comparison) (Percent)
Eligible Renewable [a]	**44**	**29**
Biomass & bio-waste	2	2
Geothermal	0	4
Small hydroelectric	0	3
Solar	21	10
Wind	21	10
Coal	**0**	**4**
Large Hydroelectric	**0**	**15**
Natural Gas	**39**	**34**
Nuclear	**0**	**9**
Other	**0**	**<1**
Unspecified sources of power[b]	**17**	**9**
Total	**100 Percent**	**100 Percent**

[a] The Eligible Renewables category is further delineated into the specific sources: biomass & waste, geothermal, small hydroelectric, solar, and wind.

[b] "Unspecified sources of power" means electricity from transactions that are not traceable to specific generation sources.

SOURCES: CEC 2018c.

3.2.1.3 Transportation Energy

Transportation energy is calculated from fuels used to power on-road and off-road vehicles. Based on available fuel consumption data from the CEC, in 2017, residences and businesses in all of San Diego County (including incorporated municipalities) consumed a total of 1.23 billion gallons of gasoline and 92 million gallons of diesel fuel (CEC 2019).

SDG&E is required to commit to the use of renewable energy sources for compliance with the Renewables Portfolio Standard (RPS), which requires at least 33 percent of its energy portfolio to come from renewable sources by 2020. As of 2017, nearly 45 percent of SDG&E's generating capacity is from renewable energy sources, surpassing the original RPS goal. SB 350 (Chapter 547, Statutes of 2015) further increased the RPS to 50 percent by 2030 and included interim targets of 40 percent by 2024 and 45 percent by 2027. Eligible renewable resources are defined in the RPS to include biodiesel; biomass; hydroelectric and mall hydro (30 Mega Watts [MW] or less); aqueduct hydro power plants; digester gas; fuel cells; geothermal; landfill gas; municipal solid waste; ocean thermal, ocean wave, and tidal current technologies; renewable derived biogas; multi-fuel

facilities using renewable fuels; solar photovoltaic (PV); solar thermal electric; wind; and other renewables that may be defined later. SB 100 (Chapter 312, Statutes of 2018) further increases the RPS to 50 percent by December 31, 2026 and to achieve 60 percent by December 31, 2030. SB 100 also states that eligible renewable energy sources and zero-carbon resources supply 100 percent of retail sales of electricity and 100 percent of electricity procured to serve state agencies by December 31, 2045.

3.2.2 Regulatory Setting

3.2.2.1 Federal

Energy Independence and Security Act

Signed on December 19, 2007, the Energy Independence and Security Act (EISA) of 2007 aims to increase U.S. energy independence and security, develop renewable energy production, protect consumers, increase the efficiency of products, buildings, and vehicles, promote research on and deploy greenhouse gas capture and storage options, and improve the energy performance of the Federal Government. The three key provisions enacted are the Corporate Average Fuel Economy (CAFE) Standards, the Renewable Fuel Standard, and the appliance/lighting efficiency standards (USEPA 2007).

3.2.2.2 State

State of California Integrated Energy Policy

In 2002, the Legislature passed Senate Bill 1389, which required the California Energy Commission (CEC) to develop an integrated energy plan every two years for electricity, natural gas, and transportation fuels, for the California Energy Policy Report. The plan calls for the state to assist in the transformation of the transportation system to improve air quality, reduce congestion, and increase the efficient use of fuel supplies with the least environmental and energy costs. To further this policy, the plan identifies a number of strategies, including assistance to public agencies and fleet operators in implementing incentive programs for Zero Emission Vehicles and their infrastructure needs, and encouragement of urban designs that reduce vehicle miles traveled and accommodate pedestrian and bicycle access.

The CEC has adopted the 2015 Integrated Energy Policy Report, which assesses major energy trends and issues facing the state's electricity, natural gas, and transportation fuel sectors and provides policy recommendations to conserve resources, protect the environment, ensure reliable, secure, and diverse energy supplies, enhance the state's economy, and protect public health and safety. The 2015 Integrated Energy Policy Report covers a broad range of topics, including

energy efficiency, building energy efficiency standards, achieving 50 percent renewables by 2030, and the California Energy Demand Forecast.

Title 24, Building Standards Code and California Green Building Standards (CALGreen) Code

The CEC first adopted the Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations (CCR), Title 24, Part 6) in 1978 in response to a legislative mandate to reduce energy consumption in the State. The standards are updated periodically to allow for the consideration and inclusion of new energy efficiency technologies and methods. The California Building Standards Commission (CBSC) adopted Part 11 of the Title 24 Building Energy Efficiency Standards, referred to as the California Green Building Standards (CALGreen) Code. The purpose of the CALGreen Code is to "improve public health, safety and general welfare by enhancing the design and construction of buildings through the use of building concepts having a positive environmental impact and encouraging sustainable construction practices in the following categories: (1) Planning and design; (2) Energy efficiency; (3) Water efficiency and conservation; (4) Material conservation and resource efficiency; and (5) Environmental air quality." The CALGreen Code establishes mandatory measures for new residential and non-residential buildings, which include requirements for energy efficiency, water conservation, material conservation, planning and design, and overall environmental quality. The CALGreen Code was most recently updated in 2016 to include new mandatory measures for residential as well as nonresidential uses. The new measures took effect on January 1, 2017. Buildings constructed under the project would be required to comply with the applicable provisions of Title 24 and the CALGreen Code in effect at the time of building permit issuance.

Senate Bill 375

SB 375 was signed into law in 2008 and is intended to provide a means for achieving AB 32 Greenhouse Gas Emissions target reduction goals from cars and light trucks through long-range regional growth strategies and transportation plans. SB 375 is directed toward California's 18 Metropolitan Planning Organizations (MPOs). The San Diego Association of Governments (SANDAG) is San Diego County's MPO. Under SB 375, each MPO is required to develop a "Sustainable Communities Strategy (SCS)," a newly required element of the Regional Transportation Plan (RTP). SB 375 does not take over local planning functions, and a SCS does not in any way supersede a General Plan, specific plan, or local zoning ordinance. Additionally, SB 375 does not require any consistency between the SCS and these planning and development regulatory documents. However, the MPOs are required to develop the SCS through integrated land use and transportation planning and demonstrate an ability to attain the proposed reduction targets by 2020 and 2035. See below the

discussion of SANDAG's San Diego Forward: The Regional Plan, which contains the SCS and RTP.

Executive Order B-55-18

On September 10, 2018, the governor issued Executive Oder B-55-18, which established a new statewide goal of achieving carbon neutrality by 2045 and maintaining net negative emissions thereafter. This goal is in addition to the existing statewide GHG reduction targets established by SB 375, SB 32, SB 1383, and SB 100.

3.2.2.3 Regional

San Diego Association of Governments San Diego Forward: The Regional Plan

On October 9, 2015, the SANDAG Board of Directors adopted San Diego Forward: The Regional Plan. This plan combines the Regional Comprehensive Plan from 2004 with the 2050 RTP/SCS, which was adopted in 2012. The Regional Plan identifies the five following strategies to move the San Diego region toward sustainability:

- Focus housing and job growth in urbanized areas where there is existing and planned transportation infrastructure, including transit,
- Protect the environmental and help ensure the success of smart growth land use policies by preserving sensitive habitat, open space, cultural resources, and farmland,
- Invest in a transportation network that gives people transportation choices and reduces greenhouse gas emissions,
- Address the housing needs of all economic segments of the population, and
- Implement the Regional Plan through incentives and collaboration.

SDG&E Individual Integrated Resource Plan

The Integrated Resource Plan (IIRP) process is the statewide approach to electric resource planning established by SB 350 intended to achieve California's GHG emissions reduction goals for the electric sector through and beyond 2030. In addition to addressing SDG&E's position relative to the GHG target, SDG&E's IIRP provides data and analysis describing its Disadvantaged Communities (DACs), including a comprehensive description of its current activities serving DAC customers, and a discussion on early prioritization of emissions in DACs. SDG&E current RPS position has around 45 percent from renewable energy and no coal. SDG&E identifies a need for additional GHG emission reduction activities to be conducted in the outer years of the planning horizon (2026–2030). In the forecast to 2030, the SDG&E Conforming Portfolio demonstrates that

SDG&E is providing energy to the system consistent with its customers' demand (SDG&E 2018.)

Sempra Energy 2017 Corporate Sustainability Report

Sempra Energy's annual corporate sustainability report includes year-over-year performance in GHG emissions, environmental compliance and water use. Sempra has made progress in reducing GHG emissions and increasing the amount of low-carbon energy in their power generation portfolio (Sempra Energy 2017):

- By 2021, Sempra Energy intends to achieve a power-generation emissions rate of 35 percent below our 2010 baseline,
- By 2022, their power generation portfolio is projected to be 69 percent emissions-free,
- Approximately 45 percent of the electricity SDG&E delivered to its customers in 2017 was from renewable energy sources – the utility is on track to meet the California target of 50 percent-renewable by 2030, and
- Only 1 percent of their water was withdrawn from freshwater sources; 7 percent was withdrawn from recycled/reclaimed sources; and 92 percent was withdrawn from seawater sources.

3.2.2.4 Local

City of San Diego Climate Action Plan

The City adopted its Climate Action Plan (CAP) in December 2015. With implementation of the CAP the City seeks to reduce emissions 15 percent below baseline emissions by 2020, 40 percent below by 2030, and 50 percent below by 2035. The City has identified the following five strategies to reduce their GHG emissions and meet their 2020, 2030, and 2035 targets:

1. Energy- and water-efficient buildings
2. Clean and renewable energy
3. Bicycling, walking, transit, and land use
4. Zero waste and waste management
5. Climate resiliency

These strategies are integral to reaching the City's target emission reductions and are implemented via the CAP Consistency Checklist. The checklist evaluates a project's consistency with the strategies and compares against three criteria:

1. Project's consistency with existing General Plan

2. Assessment of project's design features for compliance with CAP strategies
3. If a project is inconsistent with land use or zoning, then is the project in a transit priority area that allows for more intensive development than assumed under the CAP

The strategies and checklist developed under the CAP would encourage not only emissions reductions, but increases in building energy and transportation efficiency improvements.

3.2.4 Analysis of Project Effects and Determination as to Significance

For purposes of this EIR, the identified significance thresholds are based on criteria provided in the City of San Diego's CEQA Significance Determination Thresholds (City of San Diego 2016). Accordingly, a significant energy impact would occur if the project would:

Issue 1: Result in the use of excessive amounts of fuel or energy (e.g. natural gas) or

Issue 2: Result in the use of excessive amounts of power.

3.2.3.1 Energy Resources

Issue 1: Would the proposed project result in the use of excessive amounts of fuel or energy (e.g. natural gas)?

Impact Analysis

Community Plan Amendment and Rezone and Site Demolition and Preparation

Construction

The proposed project includes an amendment to the Clairemont Mesa Community Plan (CMCP) and a rezone that would allow for a future residential development with a maximum of 404 units. During construction, (including both site demolition and preparation activities associated with the proposed project and anticipated construction of the future development) energy would be consumed predominantly in the form of electricity for water conveyance for dust control, as well as minor consumption from other onsite construction activities. Natural gas would not be consumed in any appreciable amount. Project construction would also consume energy in the form of petroleum-based fuels associated with the use of off-road construction vehicles and equipment on the project site, construction workers travel to and from the project site, and delivery and haul truck trips (e.g., hauling of demolition material to offsite reuse and disposal facilities). Site preparation and demolition of the existing site and construction of the future development were conservatively considered as a

combined construction action with no break in schedule between demolition and redevelopment. If the site redevelopment does not occur immediately following the demolition, construction impacts would be lower than those analyzed here due to the use of a more energy-efficient and cleaner burning construction vehicle fleet mix, pursuant to State regulations that require vehicle fleet operators to phase-in less polluting heavy-duty equipment. As a result, should project construction of the future development commence at a later date than analyzed in this EIR, energy impacts would be lower than the impacts disclosed herein.

Table 3.2-2 provides a summary of the annual average electricity, natural gas, gasoline fuel, and diesel fuel estimated to be consumed during both phases of construction for the proposed project. Each of these energy types is discussed and analyzed in greater detail in the sections below.

Table 3.2-2
Construction Average Annual Energy Use

Fuel Type	Quantity
Gasoline	**gallons**
On-Road Construction Equipment	13,491
Off-Road Construction Equipment	0
Total Gasoline	**13,491**
Annual County Gasoline Usage	**1,387,000,000**
% of County	**0.0010%**
Diesel	**gallons**
On-Road Construction Equipment	15,470
Off-Road Construction Equipment	22,497
Total Diesel	**37,967**
Annual County Diesel Usage	**214,580,000**
% of County	**0.018%**
Electricity	**GWh**
Water Conveyance for Dust Control	0.069
SDG&E Annual Usage (2018)	**18,767**
% of SDG&E	**0.0004%**
Project Length	**1.75 years**

SOURCE: ESA 2019 (See Appendix E)

Refer to Appendix E for detailed calculations

Natural Gas

As stated above, construction activities associated with the County's site preparation and demolition activities and the future construction of the residential development project would not consume appreciable amounts of natural gas during construction because a very limited amount of the equipment would rely

on natural gas for fuel. Therefore, impacts would not result in the use of excessive amounts of fuel or energy, resulting in a less than significant impact.

Transportation Energy

Table 3.2-2 above reports the amount of petroleum-based transportation energy that could potentially be consumed during construction associated with site demolition and preparation activities and the future construction of the residential development project based on the conservative set of assumptions provided in Appendix E of this EIR. Construction on- and off-road vehicles are anticipated to consume approximately 13,491 gallons of gasoline and 37,967 gallons of diesel annually. For comparison purposes only, and not for the purpose of determining significance, the fuel usage during project construction would represent approximately 0.001 percent of the 2018 annual on-road gasoline-related energy consumption and 0.04 percent of the 2018 annual diesel fuel-related energy consumption in San Diego County, as detailed in Appendix E of this EIR.

Transportation fuels (gasoline and diesel) are produced from crude oil, which can be domestic or imported from various regions around the world. Based on current proven reserves, crude oil production would be sufficient to meet over 50 years of worldwide consumption (BP Global 2018). The proposed project would be required to comply with Corporate Average Fuel Economy (CAFE) standards, which would result in more efficient use of transportation fuels (lower consumption). Project-related vehicle trips would also comply with Pavley and Low Carbon Fuel Standards (LCFS), which are designed to reduce vehicle GHG emissions, but would also result in fuel savings above and beyond compliance with CAFE standards.

Construction vehicles would utilize fuel-efficient equipment consistent with state and federal regulations, such as fuel efficiency regulations in accordance with the CARB Pavley Phase II standards, the anti-idling regulation in accordance with Section 2485 in Title 13 of the CCR, and fuel requirements for stationary equipment in accordance with Section 93115 (concerning Airborne Toxic Control Measures) in Title 17 of the CCR, and would comply with State measures to reduce the inefficient, wasteful, and unnecessary consumption of energy, such as petroleum-based transportation fuels. While these regulations are intended to reduce construction emissions, compliance with the anti-idling and emissions regulations discussed above would also result in fuel savings from the use of more fuel-efficient engines.

Based on the analysis above, construction would utilize energy only for necessary on-site activities and to transport construction materials and demolition debris to and from the project site. As discussed above, idling restrictions and the use of cleaner, energy-efficient equipment would result in less fuel combustion and energy consumption and thus minimize the proposed

project's construction-related energy use. Therefore, construction associated with both site demolition and preparation activities and with the future development would not result in the use of excessive amounts of fuel or energy.

Operation

During operation of the anticipated future residential development, energy would be consumed for multiple purposes, including, but not limited to, heating, ventilation, and air conditioning (HVAC), lighting, water usage, solid waste disposal, and vehicle trips. The future development project would be built as a Leadership in Energy and Environmental Design (LEED) Building Design Silver or equivalent.

As shown in **Table 3.2-3**, the proposed project's annual energy demand would be approximately 2.48 GWh of electricity, 6,310 MMBtu of natural gas, 187,528 gallons of gasoline, and 30,615 gallons of diesel fuel.

Table 3.2-3
Project Operational Energy Usage and Regional Energy Supply

Source	Electricity per Year	Natural Gas per Year	Gasoline Fuel per Year (gallons) [c]	Diesel Fuel per Year (gallons)[c]
SDG&E	(GWh)[a]	(MMBtu)[b]	—	—
San Diego County (Transportation Sector) (2017) [c]	18,767	48,249,720	1,387,000,000	214,580,000
Building Energy [d]	2.48	6,310	—	—
Mobile Sources [e]	—	389	187,528 [f]	30,615 [f]
Total	2.48	6,699	**187,528**	**30,615**
Percent of SDG&E	0.013%	0.014%	—	—
Percent of San Diego County (Transportation Sector)	—	—	0.014%	0.014%

NOTES:

[a] CEC: http://www.ecdms.energy.ca.gov/elecbyutil.aspx

[b] CEC: http://www.ecdms.energy.ca.gov/gasbyutil.aspx

[c] California Energy Commission; 2010-2018 CEC-A15 Results and Analysis

[d] CalEEMod v2016.3.2

[e] EMFAC2017

SOURCE: ESA 2019 (See Appendix E)
Refer to Appendix E for detailed calculations

The proposed project would comply with the applicable provisions of Title 24 and the CALGreen Code in effect at the time of building permit issuance to minimize energy demand. As such, the proposed project would minimize its energy demand in accordance with the regulations.

Natural Gas

The proposed project would increase the demand for natural gas resources related to heating systems, water systems, and compressed natural gas (CNG) vehicles. The project's estimated operational natural gas demand is provided in Table 3.2-3; the proposed project is projected to generate an annual demand for natural gas totaling approximately 6,310 MMBtu. As would be the case with electricity, the proposed project would comply with the applicable provisions of Title 24 and the CALGreen Code in effect at the time of building permit issuance to minimize natural gas demand. As such, the proposed project would minimize its energy demand in accordance with the regulations. Therefore, with the incorporation of these features, operation of the proposed project would not result in the use of excessive amounts of fuel or energy.

Transportation Fuel

The proposed project would increase the demand for fuel resources. The project's estimated operational gasoline and diesel fuel use is provided in Table 3.2-3; the proposed project is projected to generate an annual demand for gasoline totaling approximately 187,528 gallons per year and generate annual demand for diesel totaling approximately 30,615 gallons. The fuel consumption generated by the project represents 0.014 percent of the County's total gasoline use and 0.014 percent of the County's diesel use in 2018. The project is located in a planned transit priority area (TPA) with high frequency transit services immediately adjacent to the site on Genesee Avenue. Transit includes Bus Route #41 and Bus Route #27 which are both within 175 feet of the project site. The project's location near public transit would help reduce vehicle trips to and from the site and reduce the amount of fossil fuel used by the project. In addition, the project is walking distance from commercial centers offering retail, restaurants, and grocery stores that would limit the amount of fossil fuel used by residents and encourage pedestrian activity. Therefore, the project's location near public transit and commercial areas would minimize fossil fuel consumption and not result in the use of excessive amounts of fuel.

3.2.3.2 Power

Issue 2: Result in the use of excessive amounts of power

Impact Analysis

Community Plan Amendment and Rezone and Site Demolition and Preparation

Construction

During construction of both site demolition activities and the future residential development allowed under the proposed project, electricity would be supplied by SDG&E and would be obtained from the existing electrical lines that connect to the project site. As shown in Table 3.2-2, annual average construction electricity usage would be approximately 0.069 GWh. Although there is a minor temporary increase in electricity consumption during construction, the electrical consumption would be within the supply and infrastructure capabilities of SDG&E (18,767 GWh net energy for 2018), representing less than 0.001 percent of SDG&E's 2018 supply (CEC 2018d). The electricity demand at any given time would vary throughout the construction period based on the construction activities being performed, and would cease upon completion of construction. Electricity use from construction would be short-term, limited to working hours, used for necessary construction-related activities, and represent a small fraction of the proposed project's net annual operational electricity. Therefore, impacts from construction-related electrical demand would be less than significant and would not result in the use of excessive amounts of power.

Operation

As shown in Table 3.2-3, operation of the future residential development would result in a projected consumption of electricity totaling approximately 2.48 GWh per year and represent 0.013 percent of SDG&E's total sales in 2018. The project would increase demand for electricity including what is needed to support building operations and would be subject to regulations under the CALGreen Code. The CALGreen Code establishes mandatory standards that require new residential and non-residential uses to reduce electricity, water, and waste to a certain percentage beyond an established baseline level. For example, the project would be required to reduce indoor water use by 20 percent below baseline levels under CALGreen code. The project's commitment to LEED Silver or equivalent design would also increase the overall energy efficiency of the building and ensure efficient use of energy. Therefore, compliance with CALGreen code and commitment to LEED Silver or equivalent would ensure the project would not result in the use of excessive amounts of power.

3.2.4 Cumulative Impact Analysis

Natural Gas

The geographic context for the cumulative analysis of natural gas is the SDG&E service area. Growth within this geography is anticipated to increase the demand for natural gas and the need for infrastructure, such as new or expanded facilities.

Implementation of the project and related cumulative projects in the SDG&E service area is expected to increase natural gas consumption and the need for natural gas supplies. According to SDG&E data, natural gas sales have been relatively stable over the past five years with a slight increase from 45,099,250 MMBTU in 2014 to 48,249,720 MMBTU in 2018. Projected throughput in 2022 is approximately 53,200,000 MBTU. Based on the project's estimated natural gas consumption as shown in Table 3.2-3, the project would account for less than approximately 0.012 percent of SDG&E's total electrical energy usage for the project's buildout year (i.e., 2020).

Although future development projects would result in irreversible use of natural gas resources that could limit future availability, the use of such resources would be on a relatively small scale and would be consistent with regional and local growth expectations for the SDG&E service area. Further, like the project, other future development projects would be expected to incorporate energy conservation features, comply with applicable regulations including CALGreen and State energy standards in Title 24. Therefore, the project would not have a cumulatively considerable impact related to natural gas consumption, and impacts would be less than significant.

Transportation Fuel

Buildout of the project and related projects in the region would be expected to increase overall vehicle miles travelled (VMT); however, the siting of development near transit priority areas consistent with 2016 RTP/SCS goals would result in reduced VMT per capita and the effect on transportation fuel demand would be minimized by future improvements to vehicle fuel economy pursuant to Federal and State regulations. By 2025, vehicles are required to achieve 54.5 mpg (based on USEPA measurements), which is a 54 percent increase from the 35.5 mpg standard in the 2012-2016 standards. The project is located in a planned TPA with high frequency transit services immediately adjacent to the site on Genesee Avenue. The project's location near public transit would help reduce vehicle trips to and from the site and reduce the amount of fossil fuel used by the project. Siting land use development projects near transit facilities is consistent with the State's overall goals to reduce VMT pursuant to SB 375, and as outlined in the 2016 RTP/SCS for the region. Related projects

would need to demonstrate consistency with these goals and incorporate project design features or mitigation measures as required under CEQA that would also ensure related projects contribute to transportation energy efficiency. Furthermore, according to the U.S. Energy Information Administration's International Energy Outlook 2017, the global supply of crude oil, other liquid hydrocarbons, and biofuels is expected to be adequate to meet the world's demand for liquid fuels through 2040 (USEIA 2017). The project's location near public transit would help reduce vehicle trips to and from the site and reduce the amount of fossil fuel used by the project. Siting land use development projects near transit facilities is consistent with the State's overall goals to reduce VMT pursuant to SB 375, and as outlined in the 2016 RTP/SCS for the region. Cumulative projects would need to demonstrate consistency with these goals and incorporate project design features or mitigation measures as required under CEQA that would also ensure related projects contribute to transportation energy efficiency. Furthermore, according to the U.S. Energy Information Administration's International Energy Outlook 2017, the global supply of crude oil, other liquid hydrocarbons, and biofuels is expected to be adequate to meet the world's demand for liquid fuels through 2040 (USEIA 2017). Therefore, as the project would be located in a TPA near public transit and commercial/retail areas and incorporate a TDM program consistent with State goals for reducing VMT, the project would not have a cumulatively considerable impact related to transportation energy, and impacts would be less than significant.

Electricity

The geographic context for the cumulative analysis of electricity is SDG&E's service area. Growth within this area is anticipated to increase the demand for electricity and the need for infrastructure, such as new or expanded facilities.

Buildout of the proposed project, the related projects, and additional growth forecast to occur in the city would increase electricity consumption during project construction and operation, and may cumulatively increase the need for energy supplies. SDG&E forecasts that its electricity demand in 2022 would be approximately 19,500 GWh (CEC 2018d). As shown in Table 3.2-3, the proposed project's estimated net new electrical consumption would account for up to approximately 0.013 percent of SDG&E's projected electricity sales for 2018 and 0.013 percent of SDG&E's projected electricity sales for 2022.

Future development would result in the irreversible use of electricity resources that could limit future energy availability. However, the utility provider for the proposed project and related projects have determined that the use of such resources would be minor compared to the existing supply and infrastructure within the SDG&E service area and would be consistent with growth expectations for SDG&E's service area.

Furthermore, like the proposed project, other future development projects would be expected to incorporate energy conservation features, comply with applicable regulations including CALGreen and State energy standards under Title 24, and incorporate mitigation measures, as necessary. Furthermore, the proposed project would commit to LEED Silver or equivalent that would further reduce electricity consumption. As discussed above and based on evidence from SDG&E, the project would not have a cumulatively considerable impact on existing energy resources either individually or incrementally when considered with the anticipated growth in the service areas. Accordingly, the cumulative impacts related to electricity consumption would be considered less than significant.

3.2.6 Significance of Impacts Prior to Mitigation

Impacts related to energy would be less than significant.

3.2.7 Mitigation

No mitigation measures are required.

3.2.8 Conclusion

The proposed project would result in less than significant impacts related to energy use.

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3.3 Greenhouse Gas Emissions

This section analyzes the potential impacts related to greenhouse gas (GHG) emissions from implementation of the proposed project. Details regarding the greenhouse gas emissions analysis are provided in Appendix F of this EIR.

There were no comments related to greenhouse gas emissions received during the public comment period for the Notice of Preparation (NOP). The NOP and all comment letters received in response to the NOP are included in Appendix A of this EIR.

3.3.1 Existing Conditions

3.3.1.1 Existing Setting

Global climate change refers to changes in average climatic conditions on Earth as a whole, including changes in temperature, wind patterns, precipitation and storms. Historical records indicate that global climate changes have occurred in the past due to natural phenomena; however, data indicates that the current global conditions differ from past climate changes in rate and magnitude. The current changes in global climate have been attributed to anthropogenic (human-caused) activities by the Intergovernmental Panel on Climate Change (IPCC 2014). GHGs trap long-wave radiation or heat in the atmosphere, which heats the surface of the Earth. Without human intervention, the Earth maintains an approximate balance between GHG emissions in the atmosphere and the storage of GHGs in the oceans and terrestrial ecosystems. GHGs are the result of both natural and anthropogenic activities. Forest fires, decomposition, industrial processes, landfills, and consumption of fossil fuels for power generation, transportation, heating, and cooking are the primary sources of GHG emissions.

The Federal Government and State of California recognized that anthropogenic GHG emissions are contributing to changes in the global climate, and that such changes are having and will have adverse effects on the environment, the economy, and public health. While worldwide contributions of GHG emissions are expected to have widespread consequences, it is not possible to link particular changes to the environment of California or elsewhere to GHGs emitted from a particular source or location. In other words, emissions of GHGs have the potential to cause global impacts rather than local impacts. Increased concentrations of GHGs in the Earth's atmosphere have been linked to global climate change and such conditions as rising surface temperatures, melting icebergs and snowpack, rising sea levels, and the increased frequency and magnitude of severe weather conditions (IPCC 2014). Existing climate change models also show that climate warming portends a variety of impacts on agriculture, including loss of microclimates that support specific crops, increased pressure from invasive weeds and diseases, and loss of productivity due to

changes in water reliability and availability (OPR 2018, CNRA 2018). In addition, rising temperatures and shifts in microclimates associated with global climate change are expected to increase the frequency and intensity of wildfires (USGCRP 2018, OPR 2018).

State law defines GHGs to include the following compounds: carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6).[1] The most common GHG that results from human activity is CO_2, which represents 76 percent of total anthropogenic GHG emissions in the atmosphere (as of 2010 data) (IPCC 2014), followed by CH_4 and N_2O. Scientists have established a Global Warming Potential (GWP) to gauge the potency of each GHG's ability to absorb and re-emit long-wave radiation and these GWP ratios are available from IPCC. The GWP of a gas is determined using CO_2 as the reference gas with a GWP of 1 over 100 years. For example, a gas with a GWP of 10 is 10 times more potent than CO_2 over 100 years. The sum of each GHG multiplied by its associated GWP is referred to as carbon dioxide equivalents (CO_2e). The measurement unit CO_2e is used to report the combined potency of GHG emissions.

GHG emission inventories have been calculated using the GWPs from the IPCC's Assessment Reports, the Second Assessment Report (SAR) (IPPC 1995), the Fourth Assessment Report (AR4) (IPCC 2007), the most recent (2013) in its Fifth Assessment Report (AR5) (IPCC 2013). However, the United Nations Framework Convention on Climate Change (UNFCCC) reporting guidelines for national inventories require the use of GWP values from the AR4; therefore, official emission estimates for California and the U.S. are reported using AR4 GWP values, and statewide and national GHG inventories have not yet updated their GWP values to the AR5 values.

By applying the GWP ratios, project-related CO_2e emissions can be tabulated in metric tons per year. Typically, the GWP ratio corresponding to the warming potential of CO_2 over a 100-year period is used as a baseline. Compounds that are regulated as GHGs and their respective GWPs are discussed below and are summarized in Error! Reference source not found..

- **Carbon Dioxide:** CO_2 is the most abundant GHG in the atmosphere and is primarily generated from fossil fuel combustion from stationary and mobile sources. CO_2 is the reference gas (GWP of 1) for determining the GWPs of other GHGs.
- **Methane:** CH_4 is emitted from biogenic sources (i.e., resulting from the activity of living organisms), incomplete combustion in forest fires, landfills,

[1] CEQA Guidelines Section 15364.5; Health and Safety Code, Section 38505(g).

manure management, and leaks in natural gas pipelines. The GWP of CH_4 is 21 (SAR), 25 (AR4), and 28 (AR5).

- **Nitrous Oxide:** N_2O produced by human-related sources including agricultural soil management, animal manure management, sewage treatment, mobile and stationary combustion of fossil fuel, adipic acid production, and nitric acid production. The GWP of N_2O is 310 (SAR), 298 (AR4), and 265 (AR5).
- **Hydrofluorocarbons:** HFCs are fluorinated compounds consisting of hydrogen, carbon, and fluorine, and are typically used as refrigerants in both stationary refrigeration and mobile air conditioning systems. The GWPs of HFCs ranges from 140 for HFC-152a to 11,700 for HFC-23 (SAR), 124 for HFC-152a to 14,800 for HFC-23 (AR4), and 138 for HFC-152a to 12,400 for HFC-23 (AR5).
- **Perfluorocarbons:** PFCs are fluorinated compounds consisting of carbon and fluorine, and are primarily created as a byproduct of aluminum production and semiconductor manufacturing. The GWPs of PFCs range from 6,500 to 9,200 (SAR), 7,390 to 17,700 (AR4), and 6,630 to 17,400 (AR5).
- **Sulfur Hexafluoride:** SF_6 is a fluorinated compound consisting of sulfur and fluoride, and is a colorless, odorless, nontoxic, nonflammable gas, most commonly used as an electrical insulator in high voltage equipment that transmits and distributes electricity. SF_6 has a GWP of 23,900 (SAR), 22,800 (AR4), and 23,500 (AR5).

Table 3.3-1
Regulated Greenhouse Gas's Reported GWP Values

Regulated GHG Compound	IPCC SAR GWP	IPCC AR4 GWP	IPCC AR5GWP
Carbon Dioxide (CO_2)	1	1	1
Methane (CH_4)	21	25	28
Nitrous Oxide (N_2O)	310	298	265
Hydrofluorocarbons (HFCs)	140 to 11,700	124 to 14,800	138 to 12,400
Perfluorocarbons (PFCs)	6,500 to 9,200	7,390 to 17,700	6,630 to 17,400
Sulfur Hexafluoride (SF_6)	23,900	22,800	23,500

SOURCE: IPCC 2014.

CARB compiles the California Greenhouse Gas Emission Inventory, the most recent inventory is the 2019 edition, which reports the State's GHG emissions inventory for calendar year 2017 of 424.1 million metric tons of CO_2e ($MMTCO_2e$) including emissions resulting from imported electrical power (CARB 2019), which is 5 MMTCO2e lower than 2016 levels and 7 MMTCO2e below the 2020 GHG

Limit of 431 MMTCO2e. According to CARB, California is on track to meet the 2020 GHG reduction target of AB 32), as demonstrated by the declining trend coupled with implementation of the state's GHG reduction programs (such as the Renewables Portfolio Standard (RPS), Low Carbon Fuel Standard (LCFS), vehicle efficiency standards, and declining caps under the Cap and Trade Program) (CEC 2006a). Error! Reference source not found.**2** identifies and quantifies statewide anthropogenic GHG emissions and sinks (e.g., carbon sequestration due to forest growth) in 1990 and 2016. As shown in Table 3.3-2, the transportation sector is the largest contributor to statewide GHG emissions at 39 percent in 2016.

Table 3.3-2
State of California Greenhouse Gas Emissions

Category	Total 1990 Emissions ($MMTCO_2e$)	Percent of Total 1990 Emissions	Total Emissions ($MMTCO_2e$)	Percent of Total 2016 Emissions
Transportation	150.7	35%	169.86	40%
Electric Power	110.6	26%	62.39	14%
Commercial	14.4	3%	13.02	3%
Residential	29.7	7%	26.00	6%
Industrial	103.0	24%	89.40	21%
Recycling and Waste[a]	–	–	8.89	2%
High GWP/Non-Specified[b]	1.3	<1%	19.99	5%
Agriculture/Forestry	23.6	6%	32.42	8%
Forestry Sinks	-6.7	–	–[c]	–
Net Total (IPCC SAR)	**426.6**	**100%**	–	–
Net Total (IPCC AR4) [d]	**431**	**100%**	**424.1**	**100%**

[a] Included in other categories for the 1990 emissions inventory.
[b] High GWP gases are not specifically called out in the 1990 emissions inventory.
[c] Forestry sinks was not calculated for 2017 pending a revised methodology under development.
[d] CARB revised the State's 1990 level GHG emissions using GWPs from IPCC's AR4.
SOURCE: (CARB 2007; CARB 2019).

3.3.1.2 Effects of Global Climate Change

The scientific community's understanding of the fundamental processes responsible for global climate change has improved over the past decade, and its predictive capabilities are advancing. However, there remain significant scientific uncertainties in, for example, predictions of local effects of climate change, occurrence, frequency, and magnitude of extreme weather events, effects of aerosols, changes in clouds, shifts in the intensity and distribution of precipitation, and changes in oceanic circulation. Due to the complexity of the

Earth's climate system and inability to accurately model it, the uncertainty surrounding climate change may never be completely eliminated. Nonetheless, the IPCC's AR5 states that, "it is extremely likely that more than half of the observed increase in global average surface temperature from 1951 to 2010 was caused by the anthropogenic increase in greenhouse gas concentrations and other anthropogenic forc[es] [sic] together" (IPCC 2013). A report from the National Academy of Sciences concluded that 97 to 98 percent of the climate researchers most actively publishing in the field support the tenets of the IPCC in that climate change is very likely caused by human (i.e., anthropogenic) activity (Anderegg et al. 2010) According to CARB, the potential impacts in California due to global climate change may include: loss in snow pack; sea level rise; more extreme heat days per year; more high ozone days; more large forest fires; more drought years; increased erosion of California's coastlines and sea water intrusion into the Sacramento and San Joaquin Deltas and associated levee systems; and increased pest infestation (USGCRP 2018).

3.3.2 Regulatory Setting

3.3.2.1 Federal

Clean Air Act

In *Massachusetts v. Environmental Protection Agency* (2007) 549 U.S. 497, the U.S. Supreme Court held in 2007 that USEPA has statutory authority under Section 202 of the federal Clean Air Act to regulate GHGs. The court did not hold that USEPA was required to regulate GHG emissions; however, it indicated that USEPA must decide whether GHGs cause or contribute to air pollution that is reasonably anticipated to endanger public health or welfare. In 2009, the USEPA Administrator signed two distinct findings regarding GHGs under Section 202(a) of the CAA. USEPA adopted a Final Endangerment Finding for the six defined GHGs (CO_2, CH_4, N_2O, HFCs, PFCs, and SF_6) on December 7, 2009. The Endangerment Finding is required before USEPA can regulate GHG emissions under Section 202(a)(1) of the CAA consistently with the United States Supreme Court decision. USEPA also adopted a Cause or Contribute Finding in which the USEPA Administrator found that GHG emissions from new motor vehicle and motor vehicle engines are contributing to air pollution, which is endangering public health and welfare. These findings do not, by themselves, impose any requirements on industry or other entities. However, these actions were a prerequisite for implementing GHG emissions standards for vehicles.

Light Duty Vehicle GHG and Fuel Efficiency Standards

In 2012, USEPA and USDOT adopted standards for model year 2017 through 2025 for passenger cars and light-duty trucks. By 2020, vehicles are required to achieve a combined standard of 41.7 mpg and 213 grams of CO_2 per mile. By

2025, vehicles are required to achieve 54.5 mpg (if GHG reductions are achieved exclusively through fuel economy improvements) and 163 grams of CO_2 per mile. According to USEPA, a model year 2025 vehicle would emit one-half of the GHG emissions from a model year 2010 vehicle. In 2017, USEPA recommended no change to the GHG standards for light-duty vehicles for model years 2022-2025. In 2018, the USEPA Administrator signed the Mid-term Evaluation Final Determination that finds that the model year 2022-2025 GHG standards are not appropriate in light of the record before USEPA and, therefore, should be revised. While not a final USEPA action, the Mid-term Evaluation Final Determination initiates a rulemaking process whose outcome will be the final agency action, however until that rulemaking has been completed, the current standards remain in effect (USEPA 2018).

Energy Independence and Security Act

The Energy Independence and Security Act of 2007 (EISA) facilitates the reduction of national GHG emissions by requiring the following:

- Increasing the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard (RFS) that requires fuel producers to use at least 36 billion gallons of biofuel in 2022;
- Prescribing or revising standards affecting regional efficiency for heating and cooling products, procedures for new or amended standards, energy conservation, energy efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances;
- Requiring approximately 25 percent greater efficiency for light bulbs by phasing out incandescent light bulbs between 2012 and 2014; requiring approximately 200 percent greater efficiency for light bulbs, or similar energy savings, by 2020; and
- While superseded by USEPA and NHTSA actions described above, (i) establishing miles per gallon targets for cars and light trucks and (ii) directing NHTSA to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for trucks.

Additional provisions of EISA address energy savings in government and public institutions, promote research for alternative energy, additional research in carbon capture, international energy programs, and the creation of green jobs.[2]

[2] A green job, as defined by the United States Department of Labor, is a job in business that produces goods or provides services that benefit the environment or conserve natural resources.

Voluntary Programs

USEPA is responsible for implementing federal policy to address GHGs. The federal government administers a wide array of public-private partnerships to reduce the GHG intensity generated in the U.S. These programs focus on energy efficiency, renewable energy, methane and other non-CO_2 gases, agricultural practices, and implementation of technologies to achieve GHG reductions. USEPA implements numerous voluntary programs that contribute to the reduction of GHG emissions. These programs (e.g., the ENERGY STAR labeling system for energy-efficient products) play a significant role in encouraging voluntary reductions from large corporations, consumers, industrial and commercial buildings, and many major industrial sectors.

3.3.2.2 State

California Air Resources Board

CARB, a part of the California Environmental Protection Agency (CalEPA), is responsible for the coordination and administration of both federal and state air pollution control programs within California. In this capacity, CARB conducts research, sets California Ambient Air Quality Standards (CAAQS), compiles emission inventories, develops suggested control measures, and provides oversight of local programs. CARB establishes emissions standards for motor vehicles sold in California, consumer products (such as hairspray, aerosol paints, and barbecue lighter fluid), and various types of commercial equipment. It also sets fuel specifications to further reduce vehicular emissions.

In 2004, CARB adopted an Airborne Toxic Control Measure (ATCM) to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to diesel particulate matter and other toxic air contaminants (Title 13 California Code of Regulations [CCR], Section 2485). ATCM applies to diesel-fueled commercial vehicles with gross vehicle weight ratings greater than 10,000 pounds that are licensed to operate on highways, regardless of where they are registered. ATCM generally does not allow diesel-fueled commercial vehicles to idle for more than 5 minutes at any given location with certain exemptions for equipment in which idling is a necessary function such as concrete trucks. While ATCM primarily targets diesel particulate matter emissions, it has co-benefits of minimizing GHG emissions from unnecessary truck idling.

In 2007, CARB adopted emission standards for off-road diesel construction equipment of greater than 25 horsepower such as bulldozers, loaders, backhoes and forklifts, as well as many other self-propelled off-road diesel vehicles. This regulation aims to reduce emissions by installation of diesel soot filters and encouraging the retirement, replacement, or repower of older, dirtier engines with newer emission controlled models. Additionally, in 2008, CARB approved the

Truck and Bus Regulation to reduce particulate matter and nitrogen oxide emissions from existing diesel vehicles operating in California (13 CCR, Section 2025, subsection (h)). In 2014, amendments to the Truck and Bus Regulation were approved by CARB to help ensure that the air quality benefits originally envisioned by the regulation will be achieved, by providing some additional compliance flexibility and options to vehicle owners (CARB 2014). Refer to Section 2.2, Air Quality, Regulatory Setting) of this EIR for additional details regarding these regulations. While these regulations primarily target reductions in criteria air pollutant emission, they have co-benefits of minimizing GHG emissions due to improved engine efficiencies.

California Greenhouse Gas Reduction Targets

Executive Order S-3-05

In 2005, Executive Order S-3-05 proclaimed that California is vulnerable to the impacts of climate change. Executive Order S-3-05 declares that increased temperatures could reduce snowpack in the Sierra Nevada Mountains; could further exacerbate California's air quality problems; and could potentially cause a rise in sea levels. In an effort to avoid or reduce the impacts of climate change, Executive Order S-3-05 calls for a reduction in GHG emissions to the year 2000 level by 2010, to year 1990 levels by 2020, and to 80 percent below 1990 levels by 2050. Executive Orders are binding on state agencies only.

Executive Order B-30-15

In 2015, Executive Order B-30-15 established a new interim Statewide reduction target to reduce GHG emissions to 40 percent below 1990 levels by 2030, ordered all State agencies with jurisdiction over sources of GHG emissions to implement measures to achieve reductions of GHG emissions to meet the 2030 and 2050 reduction targets, and directed CARB to update the Climate Change Scoping Plan to express the 2030 target in terms of million metric tons of carbon dioxide equivalent.

Executive Order B-55-18

In 2018, Executive Order B-55-18 establishes an additional Statewide policy to achieve carbon neutrality by 2045 and maintain net negative emissions thereafter. As per Executive Order B-55-18, CARB is directed to work with relevant State agencies to develop a framework for implementation and accounting that tracks progress toward this goal and to ensure future Climate Change Scoping Plans identify and recommend measures to achieve the carbon neutrality goal.

California Global Warming Solutions Act of 2006 - Assembly Bill 32

In 2006, AB 32 (codified in the California Health and Safety Code [HSC], Division 25.5 – California Global Warming Solutions Act of 2006) focuses on reducing GHG emissions in California to 1990 levels by 2020. HSC Division 25.5 defines GHGs as CO_2, CH_4, N_2O, HFCs, PFCs, and SF_6 and represents the first enforceable statewide program to limit emissions of these GHGs from all major industries with penalties for noncompliance. The law further requires that reduction measures be technologically feasible and cost effective. Under HSC Division 25.5, CARB has the primary responsibility for reducing GHG emissions. CARB is required to adopt rules and regulations directing state actions that would achieve GHG emissions reductions equivalent to 1990 statewide levels by 2020.

Senate Bill 32

In 2016, the California State Legislature adopted Senate Bill (SB) 32 and its companion bill AB 197, amended HSC Division 25.5 and established a new climate pollution reduction target of 40 percent below 1990 levels by 2030 and includes provisions to ensure the benefits of state climate policies reach into disadvantaged communities.

2008 Climate Change Scoping Plan

A specific requirement of AB 32 was to prepare a Climate Change Scoping Plan for achieving the maximum technologically feasible and cost-effective GHG emission reduction by 2020 (HSC Section 38561 (h)). CARB developed an AB 32 Scoping Plan that contains strategies to achieve the 2020 emissions cap (CARB 2013). The initial scoping plan was approved in 2008, and contained a mix of recommended strategies that combined direct regulations, market-based approaches, voluntary measures, policies, and other emission reduction programs calculated to meet the 2020 statewide GHG emission limit and initiate the transformations needed to achieve the State's long-range climate objectives (CARB 2013).

2014 Scoping Plan Update

In 2014, the first update to the Scoping Plan built upon the initial Scoping Plan with new strategies and recommendations (CARB 2013). As required by HSC Division 25.5, CARB approved the 1990 GHG emissions inventory, thereby establishing the emissions limit for 2020. CARB also updated the State's projected 2020 emissions estimate to account for the effect of the 2007–2009 economic recession, new estimates for future fuel and energy demand, and the reductions required by regulation that were recently adopted for motor vehicles and renewable energy.

2017 Climate Change Scoping Plan

The 2017 Climate Change Scoping Plan (CARB 2017b) outlines the strategies the State will implement to achieve the 2030 GHG reduction target of 40 percent below 1990 levels by 2030 established by SB 32. The 2017 Scoping Plan is also intended to "substantially advance" toward the EO S-3-05 2050 climate goal to reduce GHG emissions by 80 percent below 1990 levels by 2050.

The 2017 Scoping Plan builds on the Cap-and-Trade Regulation, the LCFS, improved vehicle, truck and freight movement emissions standards, increasing renewable energy, and strategies to reduce methane emissions from agricultural and other wastes by using it to meet our energy needs. The 2017 Scoping Plan also comprehensively addresses GHG emissions from natural and working lands of California, including the agriculture and forestry sectors. The 2017 Scoping Plan considered a number of different alternatives to achieve the 2030 GHG reduction goal. The "Scoping Plan Scenario" was ultimately adopted and relies on the continuation of ongoing and statutorily required programs and continuation of the Cap-and-Trade Program. The Scoping Plan Scenario was modified from the January 2017 Proposed Scoping Plan to reflect AB 398, including removal of the 20 percent GHG reduction measure for refineries (CARB 2017b).

CARB states that the Scoping Plan Scenario "is the best choice to achieve the State's climate and clean air goals" (CARB 2017b). Under the Scoping Plan Scenario, the majority of the reductions would result from continuation of the Cap-and-Trade regulation. Additional reductions are achieved from electricity sector standards (i.e., utility providers to supply 50 percent renewable electricity by 2030), doubling the energy efficiency savings at end uses, additional reductions from the LCFS, implementing the short-lived climate pollutant strategy (e.g., hydrofluorocarbons), and implementing the mobile source strategy and sustainable freight action plan.

Senate Bill 375

In 2008, SB 375 was intended to provide a means for achieving AB 32 Greenhouse Gas Emissions target reduction goals from cars and light trucks through long-range regional growth strategies and transportation plans. SB 375 is directed toward California's 18 Metropolitan Planning Organizations (MPOs). The San Diego Association of Governments (SANDAG) is San Diego County's MPO. Under SB 375, each MPO is required to develop a "Sustainable Communities Strategy," a newly required element of the Regional Transportation Plan (RTP). SB 375 does not take over local planning functions, and a Sustainable Community Strategy does not in any way supersede a General Plan, specific plan, or local zoning ordinance. Additionally, SB 375 does not require any consistency between the Sustainable Communities Strategy and these planning and development regulatory documents. However, the MPOs are required to develop the Sustainable Communities Strategies through integrated

land use and transportation planning and demonstrate an ability to attain the proposed reduction targets by 2020 and 2035.

Title 24, Part 6, California Code of Regulations (2005)

In 2005, California adopted new energy efficiency standards for residential and nonresidential buildings in order to reduce California's energy consumption. This program has been partially responsible for keeping California's per capita energy use approximately flat over the past 30 years.

Title 24, Part 11, California Code of Regulations (2018)

Part 11 of the Title 24 Building Energy Efficiency Standards is referred to as the California Green Building Standards (CALGreen) Code. The purpose of the CALGreen Code is to "improve public health, safety and general welfare by enhancing the design and construction of buildings through the use of building concepts having a positive environmental impact and encouraging sustainable construction practices in the following categories: (1) Planning and design; (2) Energy efficiency; (3) Water efficiency and conservation; (4) Material conservation and resource efficiency; and (5) Environmental air quality" (California Building Standards Commission 2010). In 2016, the CALGreen Code was updated to include new mandatory measures for residential and nonresidential uses including energy efficiency, water conservation, material conservation, planning and design, and overall environmental quality (California Building Standards Commission 2010). In 2018, the CALGreen code was most recently updated with new measures taking effect in 2020.

SB X1-2, SB 350, and SB 100

In 2011, SB X1-2 increased California's RPS to 33 percent by 2020. SB 350 (Chapter 547, Statues of 2015) further increased the RPS to 50 percent by 2030. The legislation also included interim targets of 40 percent by 2024 and 45 percent by 2027, and doubled energy efficiency savings in electricity and natural gas final end uses. In 2018, SB 100 (Chapter 312, Statutes of 2018) established that 100 percent of all electricity in California must be obtained from renewable and zero-carbon energy resources by the end of 2045. SB 100 also creates new standards for the RPS, increasing required energy from renewable sources for both investor-owned utilities and publicly-owned utilities from 50 percent to 60 percent by the end of 2030. Incrementally, these energy providers must also have a renewable energy supply of 44 percent by the end of 2024, and 52 percent by the end of 2027. The updated RPS goals are considered achievable, since many California energy providers are already meeting or exceeding the RPS goals established by SB 350.

Assembly Bill 341

In 2011, AB 341 established the policy goal of no less than 75 percent of solid waste generated be source reduced, recycled or composted by the year 2020.

Senate Bill 1383

SB 1383 creates goals for short-lived climate pollutant (SLCP) reductions in various industry sectors. The SLCPs included under SB 1383 – including methane, fluorinated gases, and black carbon – are GHGs that are much more potent than carbon dioxide and can have detrimental effects on human health and climate change. SB 1383 requires CARB to adopt a strategy to reduce methane by 40 percent, hydrofluorocarbon gases by 40 percent, and anthropogenic black carbon by 50 percent below 2013 levels by 2030. The methane emission reduction goals include a 75 percent reduction in the level of statewide disposal of organic waste from 2014 levels by 2025.

3.3.2.3 Regional

San Diego Association of Governments San Diego Forward: Regional Plan

SANDAG is the MPO and regional transportation planning agency for the San Diego Region. SANDAG is the regional authority that creates region-specific documents to provide guidance to local agencies, as SANDAG does not have any land use authority. SANDAG's San Diego Forward: The Regional Plan (Regional Plan) combines two of the region's existing planning documents: the Regional Comprehensive Plan for the San Diego Region (RCP) and the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).

In 2004, the RCP laid out key principles for managing the region's growth while preserving natural resources and limiting urban sprawl. The RCP covered eight policy areas, including urban form, transportation, housing, health environment, economic prosperity, public facilities, our borders, and social equity. These policy areas were addressed in the 2050 RTP/SCS and are now fully integrated into the Regional Plan that was adopted by the SANDAG Board of Directors in 2015.

The SCS describes how the region will coordinate its land use development and transportation planning activities to reduce GHG emissions (in part by decreasing vehicular fuel use), and is integrated into the RTP. SANDAG's RTP/SCS identifies significant improvements to the City's and the region's transit systems, allows for more development in areas with better access to transit, and supports efficiency improvements to regional streets and highways.

3.3.2.4 Local

City of San Diego General Plan

The City's General Plan includes several climate change-related policies aimed at reducing GHG emissions from future development and City operations. The Conservation Element policy CE-A.2 aims to "reduce the City's carbon footprint" and to "develop and adopt new or amended regulations, programs, and incentives as appropriate to implement the goals and policies set forth" related to climate change. The Land Use and Community Planning Element, the Mobility Element, the Urban Design Element, and the Public Facilities, Services, and Safety Element also identify GHG reduction and climate change adaptation goals (City of San Diego 2015). These elements contain policy language related to sustainable land use patterns, alternative modes of transportation, energy efficiency, water conservation, waste reduction, and greater landfill efficiency. The overall intent of these policies is to support climate protection actions, while retaining flexibility in the design of implementation measures, which could be influenced by new scientific research, technological advances, environmental conditions, or state and federal legislation.

One specific concept introduced in the City's General Plan is the aforementioned City of Villages strategy, which proposes growth to be directed into pedestrian-friendly mixed-use activity centers linked to an improved regional transit system. The City of Villages strategy shifts the focus of land use policies to encourage infill development and reinvest in existing communities. Locating different land uses types near one another can decrease mobile emissions. Thus, the development of dense urban "villages" would generate less GHG emissions. The City of Villages strategy can be seen as an effort to avoid what is commonly referred to as "urban sprawl".

Cumulative impacts of GHG emissions were qualitatively analyzed and determined to be significant and unavoidable in the PEIR for the City's General Plan. A PEIR Mitigation Framework was included that indicated that "for each future project requiring mitigation (measures that go beyond what is required by existing programs, plans, and regulations), project-specific measures will [need to] be identified with the goal of reducing incremental project-level impacts to less than significant; or the incremental contributions of a project may remain significant and unavoidable where no feasible mitigation exists".

City of San Diego Climate Action Plan

In 2015, the City adopted its Climate Action Plan (CAP) (City of San Diego 2015), which identifies measures to meet GHG emissions reduction targets for 2020 and 2035. The CAP consists of a 2010 inventory of GHG emissions, a business-as-usual (BAU) projection for emissions in 2020 and 2035, state targets, and

emission reductions with implementation of the CAP. The City identifies GHG reduction strategies focusing on energy- and water-efficient buildings; clean and renewable energy; bicycling, walking, transit, and land use; zero waste; and climate resiliency. Accounting for future population and economic growth, the City projects GHG emissions to be approximately 15.9 million metric tons of carbon dioxide equivalent (MMT CO_2e) in 2020 and 16.7 MMT CO_2e in 2035. To achieve its proportional share of the state reduction targets for 2020 (AB 32) and 2050 (EO S-3-05), the City would need to reduce emissions below the 2010 baseline by 15 percent in 2020 and 50 percent by 2035. To meet these goals, the City must implement strategies that reduce emissions to approximately 11.0 MMT CO_2e in 2020 and 6.5 MMT CO_2e in 2035. Through implementation of the CAP, the City is projected to reduce emissions even further below targets by 1.2 MMT CO_2e by 2020 and 205,462 MT CO_2e by 2035.

As a means to implement the CAP, the City created a CAP Consistency Checklist utilized by projects to assure compliance with the measures identified in the CAP.

3.3.3 Analysis of Project Effects and Determination as to Significance

For purposes of this EIR, the identified significance thresholds are based on criteria provided in the City of San Diego's CEQA Significance Determination Thresholds (City of San Diego 2016). Accordingly, a significant impact would occur to greenhouse gas emissions if the proposed project would:

> Issue 1: Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?
>
> Issue 2: Conflict with the City's Climate Action Plan or another applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

3.3.3.1 GHG Emissions Generation

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

Impact Analysis

Community Plan Amendment and Rezone

The project includes an amendment to the Clairemont Mesa Community Plan (CMCP) and rezoning of the project site that would allow for a future residential development with a maximum of 404 units. Project construction activities of the future residential development would contribute GHG emissions as a result of off-road diesel equipment exhaust and emissions from employee, material delivery,

and haul truck travel. Primary emissions would occur as CO_2 from gasoline and diesel combustion, with more limited vehicle tailpipe emissions of N_2O and CH_4 as well as other GHG emissions related to vehicle cooling systems.

Construction-related GHG emissions for the anticipated future development were estimated using CalEEMod, version 2016.3.2. for onsite equipment and EMFAC2017 for on-road haul, vendor and worker trips, using the same assumptions used in the air quality emissions analysis (see Section 2.2, Air Quality, of this EIR). Total estimated construction-related GHG emissions are shown in **Table 3.3-3**.

Table 3.3-3
Estimated Total Construction GHG Emissions - Community Plan Amendment and Rezone

Emission Source	Estimated MT CO_2e Emissions
Foundations/ Concrete Pour	36
Building Construction	519
Architectural Coating	79
Paving	29
Total Construction Emissions	**663 (MT)**
Annual Construction (Amortized over 30 years)	**22 (MT CO_2e /yr)**

CO_2e= carbon dioxide equivalent; MT =metric tons; MT/yr = metric tons per year.

SOURCE: ESA CalEEMod Modeling 2019.

As shown in Table 3.3-3, the total estimated GHG emissions during construction of the future development would be approximately 663 MT of CO_2e, which amortized over a 30-year period would be approximately 22 MT of CO_2e/year, which was added to the project's annual operational emissions in Table 3.3-4.

Operation of the future residential development would contribute GHG emissions as a result of building energy usage (electricity and natural gas), mobile emissions, landscaping, waste, and water. Project operational emissions were estimated using CalEEMod, version 2016.3.2, for onsite sources and EMFAC2017 for mobile sources. Total estimated operational GHG emissions (including amortized construction emissions) are shown in **Table 3.3-4**, totaling 3,146 MT of CO_2e. As discussed in Issue 2, below, the project would meet the requirements for GHG reductions for project development under the City's CAP and would be consistent with the CAP's goals. Therefore, the project would not result in GHG emissions that have a significant impact on the environment.

Table 3.3-4
Estimated Total Operational GHG Emissions - Site Demolition and Preparation

Emission Source	Estimated MT CO_2e Emissions
Building Energy	968
Mobile	1,998
Landscaping	5
Waste	23
Water	130
Total Construction (Amortized)	22
Total Operational Emissions	**3,146**

CO_2e= carbon dioxide equivalent; MT =metric tons; MT/yr = metric tons per year.

SOURCE: ESA CalEEMod Modeling 2019.

Site Demolition and Preparation

Construction-related GHG emissions for the site demolition and preparation portion of the proposed project were estimated using CalEEMod, version 2016.3.2. for onsite equipment and EMFAC2017 for on-road haul, vendor and worker trips, using the same assumptions used in the air quality emissions analysis (see Section 2.2, Air Quality, of this EIR). Total estimated construction-related GHG emissions are shown in **Table 3.3-5**.

Table 3.3-5
Estimated Total Construction GHG Emissions

Emission Source	Estimated MT CO_2e Emissions
Demolition	81
Site Preparation	66
Grading	48
Drainage/Utilities/Trenching	34
Total Construction Emissions	**229 (MT)**
Annual Construction (Amortized over 30 years)	**8 (MT CO_2e /yr)**

CO_2e= carbon dioxide equivalent; MT =metric tons; MT/yr = metric tons per year.

SOURCE: ESA CalEEMod Modeling, 2019.

As shown in Table 3.3-5, the total estimated GHG emissions during site demolition and preparation of the project would be approximately 229 MT of CO_2e, which amortized over a 30-year period would be approximately 8 MT of

CO_2e/year. As discussed in Issue 2, below, the project would meet the requirements for GHG reductions for project development under the City's CAP and would be consistent with the CAP's goals. Therefore, the project would not result in GHG emissions that have a significant impact on the environment.

3.3.3.2 Greenhouse Gas Reduction Plans

Issue 2: Would the project conflict with the City's Climate Action Plan or another applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Impact Analysis

Community Plan Amendment and Rezone and Site Demolition and Preparation

Compliance with a GHG emissions reduction plan renders a less-than-significant impact. The analyses below demonstrate that the project is consistent with the applicable GHG emission reduction plans and policies included within the 2017 Climate Change Scoping Plan and the City's Climate Action Plan.

Consistency with the CARB Scoping Plan

At the State level, Executive Orders S-3-05 and B-30-15 are orders from the State's Executive Branch for the purpose of reducing GHG emissions. Executive Order S-3-05's goal to reduce GHG emissions to 1990 levels by 2020 was adopted by the Legislature as the 2006 Global Warming Solutions Act (AB 32) and codified into law in AB 32. Executive Order B-30-15's goal to reduce GHG emissions to 40 percent below 1990 levels by 2030 was adopted by the Legislature in SB 32 and also codified into law in AB 32.

In support of AB 32, the State has promulgated specific laws and strategies aimed at GHG reductions that are applicable to the project. The primary focus of many of the Statewide and regional plans, policies, and regulations is to address worldwide climate change. Due to the complex physical, chemical, and atmospheric mechanisms involved in global climate change, there is no basis for concluding that the project's increase in annual GHG emissions would cause a measurable change in global GHG emissions necessary to influence global climate change. Newer construction materials and practices, energy efficiency requirements, and newer appliances tend to emit lower levels of air pollutant emissions, including GHGs, as compared to those built years ago; however, the net effect is difficult to quantify. The GHG emissions of the project alone would not likely cause a direct physical change in the environment. According to CAPCOA, "GHG impacts are exclusively cumulative impacts; there are no non-cumulative GHG emission impacts from a climate change perspective (CAPCOA,

2008).” It is global GHG emissions in their aggregate that contribute to climate change, not any single source of GHG emissions alone.

There are several GHG reduction plans and programs that will be implemented at state and local levels which will indirectly reduce GHG emissions from the project. These plans, programs and regulations are beyond control of the project and will occur with or without the implementation of the project. These include:

- **California Renewables Portfolio Standard (RPS) program (SB 100):** The project complies with SB100 inasmuch as the project is served by San Diego Gas and Electric (SDG&E), which is which is required to obtain 33 percent renewable power by 2020. Furthermore, per the updated requirements of SB 100, signed by Governor Brown on September 10, 2018, SDG&E would be required to procure eligible renewable electricity for 44 percent of retail sales by December 31, 2024, 52 percent by December 31, 2027, and 60 percent by December 31, 2030 and should plan to achieve 100 percent eligible renewable energy resources and zero-carbon resources by December 31, 2045.
- **Assembly Bill 1109:** According to the California Energy Commission, energy savings from AB 1109 are achieved through codes and standards. Energy savings from AB 1109 are calculated as part of codes and standards savings (CEC 2014).
- **SB 1368, CCR Title 20, Cap and Trade Program**: Reduces GHG emissions from major sources (deemed “covered entities”) by setting a firm cap on Statewide GHG emissions and employing market mechanisms to achieve AB 32’s emission-reduction mandate of returning to 1990 levels of emissions by 2020. Under Cap-and-Trade program, an overall limit is established for GHG emissions from capped sectors (e.g., electricity generation) and declines over time, and facilities subject to the cap can trade permits to emit GHGs. The Statewide cap for GHG emissions from the capped sectors commenced in 2013 and declines over time, achieving GHG emission reductions throughout the Program’s duration and on July 17, 2017 the California legislature passed Assembly Bill 398, extending the Cap-and-Trade program through 2030. The project would be consistent with this regulation as the project’s GHG emissions associated with electricity usage are covered by the Cap-and-Trade Program as the Cap-and-Trade Program covers the GHG emissions associated with electricity consumed in California, whether generated in-state or imported.
- **AB 1493 (Pavley Regulations):** Reduces GHG emissions in new passenger vehicles from model year 2012 through 2016 (Phase I) and model years 2017–2025 (Phase II). Also reduces gasoline consumption to a rate of 31 percent of 1990 gasoline consumption (and associated GHG emissions) by 2020. The project would be consistent with this regulation and would not conflict with implementation of the vehicle emissions

standards. GHG emissions related to vehicular travel by the project would benefit from this regulation because vehicle trips associated with the project would be affected by AB 1493. Mobile source emissions generated by the project would be reduced with implementation of AB 1493 consistent with reduction of GHG emissions under AB 32.

- **Low Carbon Fuel Standard (Executive Order S-01-07):** Establishes protocols for measuring life-cycle carbon intensity of transportation fuels and helps to establish use of alternative fuels. This executive order establishes a Statewide goal to reduce the carbon intensity of California's transportation fuels by at least 10 percent by 2020. The project would be consistent with this regulation and would not conflict with implementation of the transportation fuel standards. GHG emissions related to vehicular travel by the project would benefit from this regulation and mobile source emissions generated by the project would be reduced with implementation of LCFS consistent with reduction of GHG emissions under AB 32.
- **Advanced Clean Cars Program**: In 2012, CARB adopted the Advanced Clean Cars program to reduce criteria pollutants and GHG emissions for model year vehicles 2015 through 2025. The Advanced Clean Cars program includes the Low-Emission Vehicle regulations that reduce criteria pollutants and GHG emissions from light- and medium-duty vehicles, and the Zero-Emission Vehicle regulation, which requires manufacturers to produce an increasing number of pure Zero-Emission Vehicles (meaning battery electric and fuel cell electric vehicles), with provisions to also produce plug-in hybrid electric vehicles in the 2018 through 2025 model years. The standards would apply to all vehicles used by residents of the project.
- **SB 375:** SB 375 establishes mechanisms for the development of regional targets for reducing passenger vehicle GHG emissions. Under SB 375, CARB is required, in consultation with the State's Metropolitan Planning Organizations, to set regional GHG reduction targets for the passenger vehicle and light-duty truck sector for 2020 and 2035.
- **Senate Bill X7-7:** The Water Conservation Act of 2009 sets an overall goal of reducing per capita urban water use by 20 percent by December 31, 2020. Each urban retail water supplier shall develop water use targets to meet this goal. This is an implementing measure of the Water Sector of the AB 32 Scoping Plan. Reduction in water consumption directly reduces the energy necessary and the associated emissions to convene, treat, and distribute the water; it also reduces emissions from wastewater treatment. The project would utilize energy efficiency appliances and equipment and would meet the applicable energy standards in the 2019 Title 24 Building Energy Efficiency Standards and CALGreen Code, or applicable version at the time of building permit issuance.

- **California Integrated Waste Management Act (IWMA) of 1989 and Assembly Bill (AB) 341:** The IWMA mandated that State agencies develop and implement an integrated waste management plan which outlines the steps to be taken to divert at least 50 percent of their solid waste from disposal facilities. AB 341 directs CalRecycle to develop and adopt regulations for mandatory commercial recycling and sets a Statewide goal for 75 percent disposal reduction by the year 2020. GHG emissions related to solid waste generation from the project would benefit from this regulation as it would decrease the overall amount of solid waste disposed of at landfills. The decrease in solid waste would then in return decrease the amount of methane released from the decomposing solid waste.

Table 3.3-6 contains a list of GHG-reducing strategies applicable to the project. The analysis describes the consistency of the project with these laws and strategies outlined in the State's Climate Change Scoping Plan to reduce GHG emissions. The Climate Change Scoping Plan outlines a framework that relies on a broad array of GHG reduction actions, which include direct regulations, alternative compliance mechanisms, incentives, voluntary actions, and market-based mechanisms such as the Cap-and-Trade program. As a result, the project would not conflict with applicable Climate Change Scoping Plan strategies and regulations to reduce GHG emissions.

Table 3.3-6
Consistency with Applicable Climate Change Scoping Plan Greenhouse Gas Reduction Strategies

Sector / Source	Category / Description	Consistency Analysis
Energy		
CCR, Title 24, Building Standards Code	Energy Efficiency Standards for Residential and Nonresidential Buildings	**Compliant.** The project would meet or exceed the applicable requirements of the 2019 Title 24 Building Energy Efficiency Standards and CALGreen Code or applicable version at the time of building permit issuance.
California Green Building Standards Code Requirements	All bathroom exhaust fans shall be ENERGY STAR compliant.	**Compliant.** The project would utilize energy efficiency appliances and equipment and would meet the applicable energy standards in the 2019 Title 24 Building Energy Efficiency Standards and CALGreen Code, or applicable version at the time of building permit issuance. The 2019 Title 24 Building Code includes installation of ENERGY STAR compliant appliances.

Sector / Source	Category / Description	Consistency Analysis
	HVAC Systems will be designed to meet ASHRAE standards.	**Compliant.** The project would utilize energy efficiency heating, ventilation, and air conditioning (HVAC) Systems that would meet or exceed the applicable energy standards in ASHRAE 90.1-2013 Appendix G and the 2019 Title 24 Building Energy Efficiency Standards and CALGreen Code, or applicable version of these standards at the time of building permit issuance.
	Refrigerants used in newly installed HVAC systems shall not contain any CFCs.	**Compliant.** The project would meet this requirement as part of its compliance with the CALGreen Code for the use of HFCs in HVAC systems.
	Parking spaces shall be designed for carpool or alternative fueled vehicles. Up to eight percent of total parking spaces will be designed for such vehicles.	**Compliant.** The project would meet this requirement as part of its compliance with the CALGreen Code.
	Long-term and short-term bike parking shall be provided for up to five percent of vehicle trips.	**Compliant.** The project would meet this requirement as part of its compliance with the CALGreen Code.
	Stormwater Pollution Prevention Plan (SWPPP) required.	**Compliant.** The project would meet this requirement as part of its compliance with the CALGreen Code.
	Indoor water usage must be reduced by 20% compared to current California Building Code Standards for maximum flow.	**Compliant.** The project would meet this requirement as part of its compliance with the CALGreen Code.
	All irrigation controllers must be installed with weather sensing or soil moisture sensors.	**Compliant.** The project would meet this requirement as part of its compliance with the CALGreen Code.
	Wastewater usage shall be reduced by 20 percent compared to current California Building Standards.	**Compliant.** The project would meet this requirement as part of its compliance with the CALGreen Code.
	Requires a minimum of 50 percent recycle or reuse of nonhazardous construction and demolition debris.	**Compliant.** The project would meet this requirement as part of its compliance with the CALGreen Code.
	Requires documentation of types of waste recycled, diverted or reused.	**Compliant.** The project would meet this requirement as part of its compliance with the CALGreen Code.

Sector / Source	Category / Description	Consistency Analysis
Water		
CCR, Title 24	Title 24 includes water efficiency requirements for new residential and non-residential uses.	**Compliant.** The project would utilize energy efficiency appliances and equipment and would meet the applicable energy standards in the 2019 Title 24 Building Energy Efficiency Standards and CALGreen Code, or applicable version at the time of building permit issuance. The 2019 Title 24 Building Code includes installation of ENERGY STAR compliant appliances.
Other Sources		
Climate Action Team (CAT) works to coordinate Statewide efforts to implement global warming emission reduction programs and the State's Climate Adaptation Strategy.	Reduce diesel-fueled commercial motor vehicle idling.	**Consistent.** The project would be consistent with the CARB Air Toxics Control Measure to limit heavy duty diesel motor vehicle idling to no more than 5 minutes at any given time, most specifically during construction since the underlying Airborne Toxic Control Measure (ATCM) that limits heavy-duty diesel motor vehicle idling (Title 13 California Code of Regulations [CCR], Section 2485) was adopted by CARB in 2004.
	Implement efficient water management practices and incentives, as saving water saves energy and GHG emissions.	**Consistent.** The project would meet this requirement as part of its compliance with the CALGreen Code.
	Reduce GHG emissions from electricity by reducing energy demand. The California Energy Commission updates appliance energy efficiency standards that apply to electrical devices or equipment sold in California. Recent policies have established specific goals for updating the standards; new standards are currently in development.	**Consistent.** The project would meet or exceed the energy standards in the Title 24 Building Energy Efficiency Standards, and the CALGreen Code.
	Apply strategies that integrate transportation and land-use decisions, including but not limited to promoting jobs/housing proximity, high-density residential/commercial development along transit corridors, and implementing intelligent transportation systems.	**Consistent.** The project would incorporate physical and operational project characteristics that would reduce vehicle trips and VMT and encourage alternative modes of transportation. The project would reduce VMT as a result of its urban infill location, with nearby access to public transportation within a quarter-mile of the project Site, and its

Sector / Source	Category / Description	Consistency Analysis
		proximity to other destinations including off-site residential, retail, and entertainment.
	Reduce energy use in private buildings.	**Consistent.** The project would meet or exceed the energy standards in the Title 24 Building Energy Efficiency Standards, and the CALGreen Code.

SOURCE: ESA, 2019.

As described above in Table 3.3-6, the project is compliant with the applicable laws and regulations that serve to reduce GHG emissions. In addition to the project's consistency with applicable GHG reduction laws and strategies, the project would not conflict with the future anticipated Statewide GHG reductions goals as discussed under Impact 1. CARB has outlined a number of potential strategies for achieving the 2030 reduction target of 40 percent below 1990 levels, as mandated by SB 32. These potential strategies include renewable resources for half of the State's electricity by 2030, increasing the fuel economy of vehicles and the number of zero-emission or hybrid vehicles, reducing the rate of growth in VMT, supporting other alternative transportation options, and use of high-efficiency appliances, water heaters, and HVAC systems (E&E 2015). The project would benefit from Statewide and utility-provider efforts towards increasing the portion of electricity provided from renewable resources. The project would use energy-efficient appliances and equipment (e.g., ENERGY STAR rated), and water efficient fixtures.

Based on the analysis above, the project would be consistent with CARB's Scoping Plans (i.e., 2008 Scoping Plan, 2014 Scoping Plan, and 2017 Scoping Plan) and given the reasonably anticipated decline in project emissions once fully constructed and operational, the project would be consistent with the State's GHG reduction targets for 2030 and 2050. Therefore, impacts are less than significant.

The City adopted its CAP to identify GHG reduction strategies needed to achieve its proportional share of the state reduction targets for 2020 (AB 32) and 2050 (EO S-3-05). The City of San Diego CAP and Checklist were developed consistent with AB 32 (2020 target) and EO S-3-05 (2050 goal). The CAP Checklist was not developed consistent with the target reductions of Senate Bill 32; since it was EO B-30-15 at the time and CARB was in the process of updating its Scoping Plan to provide a framework for achieving the 2030 target.

As detailed in the CAP, the City would need to reduce emissions below the 2010 baseline by 15 percent in 2020 and 50 percent by 2035. Through implementation

of the CAP, the City is projected to reduce emissions below targets by 2020 and 2035. In order to ensure the CAP implementation, the City created a CAP Consistency Checklist to be utilized by projects. Therefore, projects consistent with the CAP would result in a less than significant impact.

The CAP Consistency Checklist was completed for the project (Appendix F). The project would meet the requirements for GHG reductions for project development under the City's CAP, and the future residential development would be required to complete a project-level CAP Consistency Checklist, as required in in the CPA (Appendix B). Therefore, the proposed project would be compliant with the City's CAP. Additionally, the project would be consistent with the CARB Climate Change Scoping Plan reduction goals. Thus, the project would not generate GHG emissions that would have a significant impact on the environment, nor would the project conflict with the City's CAP. Impacts would be less than significant.

3.3.4 Significance of Impacts Prior to Mitigation

Impacts related to project GHG emissions would be less than significant.

3.3.5 Mitigation

No mitigation measures are required.

3.3.6 Conclusion

The proposed project would not have any significant impacts related to GHG emissions.

3.4 Land Use and Planning

This section provides an assessment of potential impacts related to land use and planning which could occur from project implementation. This EIR section addresses the consistency of the project with the applicable land use goals, policies and regulations in these land use plans. In accordance with the California Environmental Quality Act (CEQA), the determination of significance regarding any identified inconsistencies is evaluated in terms of their potential to result in significant physical effects on the environment.

Comments related to land use received during the public comment period for the Notice of Preparation (NOP) included concerns that the project would differ from the goals expressed for the community of Clairemont Mesa within the city of San Diego and that the County should consider other land uses for the project site. These concerns have been considered and addressed, as applicable, in the following evaluation of the project's potential to impact land use and planning. The suggestion to consider land uses other than residential is addressed in Chapter 4.0, Alternatives. The NOP and all comment letters received in response to the NOP are included in Appendix A of this EIR.

3.4.1 Existing Conditions

The 4.09-acre project site is located within the Clairemont Mesa community of the city. The project site is currently developed with the former San Diego County Regional Crime Lab (Crime Lab) comprised of two buildings (one to two stories in height totaling approximately 103,500 square feet [SF]) and associated surface parking. The Crime Lab functions were relocated in 2018, with the existing buildings currently vacant except for some minimal storage.

The project site is located within a highly built environment surrounded by a mixture of commercial and residential development and within a designated planned 2035 transit priority area (TPA) (City of San Diego 2019).[1] Land uses immediately surrounding the project site include: retail and office uses to the north (across Mount Etna Drive); retail and office uses to the south; retail uses, including Genesee Shopping Center, to the east (across Genesee Avenue); and a 50-foot-wide San Diego Gas and Electric (SDG&E) electrical transmission line easement to the west with single-family residential uses further west on the other side of the easement area. A medical office building is located immediately

[1] The Transit Priority Areas map is based on the adopted SANDAG San Diego Forward Regional Plan. In accordance with SB 743, "Transit priority areas" means "an area within one-half mile of a major transit stop that is existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations." "Major transit stop", as defined by Section 21064.3, means: "a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service of 15 minutes or less during the morning and afternoon peak commute periods." (City of San Diego 2019)

adjacent to the project site to the northeast (i.e., at the southwest corner of Mount Etna Drive and Genesee Avenue). Figure 1-2 in Chapter 1.0, Project Description, contains an aerial photograph of the project site and vicinity.

Vehicular access to the project site is provided via Genesee Avenue and Mount Etna Drive, with neighborhood access provided by Genesee Avenue and Balboa Avenue, and regional access provided by the I-805 freeway located approximately 1.1 miles to the east and the San Diego Freeway (I-5) located approximately 2.1 miles to the west. Montgomery Field Airport is located approximately 3 miles to the east. San Diego Metropolitan Transit System (MTS) bus routes 27 and 41 run along Genesee Avenue and Balboa Avenue in the project area, with the closest bus stop near the Mount Etna Drive/Genesee Avenue intersection, approximately 175 feet east of the project site.

3.4.2 Regulatory Setting

3.4.2.1 Federal

There are no federal land use regulations applicable to the project.

3.4.2.2 State

There are no State land use regulations applicable to the project.

3.4.2.3 Regional

San Diego Forward: The Regional Plan

The San Diego Association of Governments (SANDAG) is the region's metropolitan planning organization that has regional authority and creates regional-specific documents to provide guidance to local agencies. SANDAG does not have land use authority. SANDAG's San Diego Forward: The Regional Plan (Regional Plan) was adopted by the SANDAG Board of Directors on October 9, 2015 (SANDAG 2015). The Regional Plan combines two of the region's existing planning documents: the Regional Comprehensive Plan (RCP) for the San Diego Region and the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The RCP, adopted in 2004, laid out key principles for managing the region's growth while preserving natural resources and limiting urban sprawl. The plan covered eight policy areas, including urban form, transportation, housing, health environment, economic prosperity, public facilities, our borders, and social equity. These policy areas were addressed in the 2050 RTP/SCS and are now fully integrated into the Regional Plan.

The project site is located within an Urban Area Transit Strategy Boundary and Existing/Planned Community Center on the SANDAG Smart Growth Concept Map (SANDAG 2016a). The Urban Area Transit Strategy Boundary denotes more

heavily populated regional subareas where local transit operators focus high-frequency transit services as specified in the Regional Plan (SANDAG 2016b). Community Centers have minimum transit service that includes high-frequency local bus or streetcar/shuttle service within an Urban Area Transit Strategy Boundary, and a minimum residential target of 20 du/ac (SANDAG 2016b).

3.4.2.4 Local

City of San Diego General Plan

State law requires each city to adopt a general plan to guide its future development, and mandates that the plan be periodically updated to ensure its continuing relevance and value (State Planning and Zoning Law, California Government Code, Section 65300). State law also requires the inclusion of seven mandatory elements into the General Plan (land use, circulation, housing, conservation, noise, open space, and safety), but permits flexibility and the inclusion of optional elements to best meet the needs of a particular city.

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

The Strategic Framework comprises the introductory chapter of the new General Plan, followed by 10 elements:

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

The **Land Use and Community Planning Element** (Land Use Element) provides policies to implement the City of Villages strategy within the context of the City's community planning program. The element addresses land use issues that apply to the City as a whole and identifies the community planning program as the mechanism to designate land uses, identify site-specific

recommendations, and refine citywide policies as needed. The Land Use Element establishes a structure for the diversity of each community and includes policy direction to govern the preparation of community plans. The element addresses zoning and policy consistency, the plan amendment process, airport-land use planning, balanced communities, equitable development, and environmental justice.

The General Plan Land Use and Street System Map (Figure LU-2 in the Land Use and Community Planning Element) designates the project site as Commercial Employment, Retail, and Services (City of San Diego 2015). In addition, the project site is located within an area identified as having a medium propensity for village development (City of San Diego 2015). Factors considered in locating village sites and ranking village propensity include community plan-identified capacity for growth; existing public facilities or an identified funding source for facilities; and an existing or identified funding source for transit service, community character, and environmental constraints. Village propensity also takes into consideration the location of parks, fire stations, and transit routes (City of San Diego 2015). By overlaying the facilities factors with the land uses, the Village Propensity Map of the General Plan illustrates existing areas that already exhibit village characteristics, and areas that may have a propensity to develop as village areas. (City of San Diego 2015)

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

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

The **Economic Prosperity Element** identifies policies intended to improve economic prosperity by ensuring that the economy grows in ways that strengthen industries, retains and creates good jobs with self-sufficient wages, increases average income, and stimulates economic investment in communities.

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

policies within the Public Facilities Element also apply to transportation and park and recreation facilities and services.

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

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

The **Noise Element** provides goals and policies to guide compatible land uses and the incorporation of noise attenuation measures for new uses to protect people living and working in the City from an excessive noise environment. The project's consistency with Noise Element requirements is addressed in Section 2.3, Noise, of this EIR.

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

Applicable land use goals and policies of the General Plan, and the project's consistency with them, are addressed in the impact analysis later in this section (see **Table 3.4-1** below).

Clairemont Mesa Community Plan

Community plans provide the level of information that is needed to review and assess proposed public and private development projects. As indicated in Figure LU-3 of the Land Use and Community Planning Element of the City's General Plan, the project site is located within the Clairemont Mesa Community Plan (CMCP) area. Originally approved in 1989, the CMCP was most recently revised in April 2011, and the City is currently in the process of completing a comprehensive update of the CMCP.

As indicated in Figure 1-3 in Chapter 1.0, Project Description, of this EIR, the project site is designated by the CMCP as Commercial-Community Center and is located within Community Plan Implementation Overlay Zone (CPIOZ) Type B (CPIOZ-B). Land uses permitted under the Commercial-Community Center designation include shopping areas with retail, service, civic, and offices uses for the community at large within three to six miles, with single-family residential prohibited, and a floor-area ratio (FAR) of 0.25-2.0 (City of San Diego 2015). The

purpose of the CPIOZ is to provide supplemental development regulations tailored to specific sites within community plan areas of the City to ensure that development proposals are reviewed for consistency with the use and development criteria that have been adopted for specific sites as part of the community plan update process (SDMC Section 132.1402(a)). According to the CMCP, only commercial uses should be permitted in the Community Core of the Clairemont Mesa Community; residential uses should not be permitted in order to preserve the core as the commercial center of the community (City of San Diego 2011). With regard to the CPIOZ-B designation, this designation requires proposed development to be processed under a Site Development Permit decided in accordance with the Decision Process 3 (e.g., staff level review, hearing officer hearing, decision to approve or deny) (SDMC Sections 112.0501 and 132.1402(b)). However, certain projects, such as affordable housing projects, may be processed under a Site Development Permit (SDP) decided in accordance with the Decision Process 2 (e.g., staff level review, staff decision to approve/deny) (SDMC Sections 112.0501 and 132.1402(b)).

In addition to identifying land use regulations applicable within specific CMCP land use designations and overlays, the CMCP includes goals and objectives established by residents, property owners, and business owners to guide development within the Clairemont Mesa community. The CMCP contains the following eight elements; those elements relative to the project are briefly described below.

- Urban Design
- Residential
- Commercial
- Industrial
- Transportation
- Open Space and Environmental Resources
- Population-Based Parks and Recreation
- Community Facilities

The **Urban Design Element** describes Clairemont Mesa as “an attractive place to live, work, and play” and key community attributes, including but not limited to, the visual aesthetics of nearby canyons, low-density residential development adjacent to canyons and parks, and well-established single-family neighborhoods on the mesa with views of Mission Bay, the Pacific Ocean, the mountains to the east, and the canyons. Although this element does not include specific goals and objectives, the CMCP has incorporated recommendations throughout other elements to achieve the Urban Design Element’s goal to preserve Clairemont Mesa’s identity for future generations.

The **Residential Element** seeks to maintain Claremont Mesa’s low-density character of predominately single-family neighborhoods and encourage rehabilitation where appropriate. This element presents objectives to guide future residential development within the Clairemont Mesa community in a manner that

would provide a diversity of housing options, ensure that future development is compatible with the existing neighborhood and does not overburden existing community or neighborhood facilities, and locate higher density housing near the commercial areas along transportation corridors. This element also seeks to provide adequate off-street parking.

The **Transportation Element** seeks to provide a safe and efficient transportation system that maximizes access to community activity centers and to destinations within the City while minimizing adverse environmental effects. This element contains objectives to improve the street system to accommodate future growth while minimizing adverse effects, develop a bicycle system, provide an efficient and high level of public transit, enhance pedestrian circulation, enhance the community's image through streetscape improvements, and minimize adverse noise impacts.

The **Open Space and Environmental Resources Element** seeks to provide an open space system that preserves existing canyon and hillsides and dedicate open space areas as infill development occurs within the community. Relevant objectives within this element include to reduce runoff and the alteration of the natural drainage system and to protect the resource value of artifacts and paleontological remains and the community's heritage for future generations.

The **Population-Based Parks and Recreation Element** seeks to provide a system of parks and recreation facilities to meet the recreational needs of the entire community in conformance with Progress Guide and General Plan standards. The relevant objective within this element is to increase recreational opportunities in new residential and commercial development.

The **Community Facilities Element** seeks to establish and maintain high level of public facilities and services to meet the needs of the community. Relevant objectives in this element include providing educational services, police and fire protection, and public utilities in accordance with City standards and maintaining water and sewer facilities to adequately serve the community.

Applicable land use goals and policies of the CMCP, and the project's consistency with them, are addressed in the impact analysis later in this section.

Land Development Code

Chapters 11 through 15 of the City's Municipal Code are referred to as the Land Development Code (LDC), as they contain the City's planning, zoning, subdivision, and building regulations that dictate how land is to be developed within the city. The LDC contains citywide base zones that specify permitted land use, density, floor- area ratio, and other development requirements for given

zoning classifications; as well as overlay zones and supplemental regulations that provide additional development requirements.

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

Chapter 14 of the LDC includes the general development regulations, supplemental development regulations, subdivision regulations, building regulations, and electrical/plumbing/mechanical regulations that govern all aspects of project development. The grading, landscaping, parking, signage, fencing, and storage requirements are all contained within the Chapter 14 general regulations.

As indicated in Chapter 1.0, Project Description, of this EIR, the project site is currently zoned Commercial Office (CO-1-2). The CO zone permits employment uses with limited, complementary retail uses and residential uses as specified, and is intended to apply in large-scale activity centers or in specialized areas where a full range of commercial activities is not desirable (SDMC Section 131.0504). The CO-1-2 zone is intended to accommodate a mix of office and residential uses that serve as an employment center and permits a maximum density of one dwelling unit for each 1,500 SF of lot area. Development at the project site is also subject to development regulations specific to this zone (and the CPIOZ-B overlay), as well as to many general development regulations pertaining to landscaping, lighting, grading, parking, signage, etc.

Applicable land use-related LDC requirements, and the project's consistency with them, are addressed in the impact analysis later in this section. Other applicable LDC requirements are discussed throughout this EIR, particularly in Chapters 1.0 (Project Description) and 2.0 (Significant Environmental Effects of the Project).

3.4.3 Analysis of Project Effects and Determination as to Significance

For purposes of this EIR, the identified significance thresholds are based on criteria provided in the City of San Diego's California Environmental Quality Act CEQA Significance Determination Thresholds (City of San Diego 2016). A significant land use and planning impact would occur if there would be a/an:

> Issue 1: Inconsistency/conflict with an adopted land use designation or intensity leading to significant physical effects on the environment;
>
> Issue 2: Inconsistency/conflict with the environmental goals, objectives, or guidelines of a General or Community Plan;
>
> Issue 3: Substantial incompatibility with an adopted land use plan;

Issue 4: Inconsistency/conflict with adopted environmental plans for an area;

Issue 5: Incompatible uses as defined in an airport land use plan or inconsistency with an Airport Land Use Compatibility Plan (ALUCP) as adopted by the Airport Land Use Commission (ALUC);

Issue 6: Significant increase in the base flood elevation of downstream properties, or construction in a Special Flood Hazard Area or floodplain/wetland buffer zone; or

Issue 7: Physical division of an established community.

For a discussion on Issue 5, see Section 2.2, Hazards and Hazardous Materials, of this EIR. As detailed in Chapter 5.0, Other CEQA Considerations, of this EIR, the project has no potential for significant impacts regarding Issues 6 (base flood elevations) and 7 (physical division of an established community).

It is noted that a project inconsistency or conflict with a land use plan would not in and of itself constitute a significant environmental impact. The plan or policy inconsistency would have to result in a significant physical effect on the environment to be considered significant pursuant to the City's guidelines and CEQA.

3.4.3.1 General/Community Plan Land Use Designation and Zoning Consistency

Issue 1: Would the project result in an inconsistency/conflict with an adopted land use designation or intensity leading to significant physical effects on the environment?

Impact Analysis

Community Plan Amendment and Rezone

As indicated previously, the project site is designated by the General Plan as Commercial Employment, Retail, and Services, and is designated by the CMCP as Commercial-Community Center with a CPIOZ-B overlay. Additionally, western Clairemont Mesa has a height overlay that limits buildings at the site to 30 feet above finished grade (SDMC Section 101.0452.5). An exception to this overlay can be considered as long as the new structure is compatible with surrounding one, two, or three-story structures or is an affordable housing project, as described in SDMC Section 101.0452.5.D.

Under the proposed Community Plan Amendment (CPA), the site would be re-designated to Residential-High (45-73 du/ac), effectively changing its planned land use. The total maximum allowable residential development under the

proposed CPA and rezone (see discussion below) would be 404 multifamily development units, including all density bonus units, provided the future development project's setbacks and building height requirement are consistent with the proposed CPIOZ Type A (CPIOZ-A) supplemental development regulations proposed overlay.

The proposed CPIOZ-A overlay sets the framework for future residential development at the project site and provides site-specific design standards to ensure a high-quality development that provides needed affordable housing opportunities near transit, shopping, and employment. The proposed Mount Etna CPIOZ-A supplemental development regulations are intended to produce a development that is consistent with the existing and emerging plans for the adjacent Community Core, provides active and accessible ground floor uses, and strengthens community connectivity and identity.

The intent of the Mount Etna CPIOZ-A regulations contained in the CPA language (Appendix B) is to provide primarily for affordable homes that complement the surrounding Community Core and existing single-family residential uses. Additional uses that activate the ground floor and provide community benefit for residents and the surrounding community are also desired. The proposed CPIOZ-A supplemental development regulations, which outline specific requirements for ground floor for uses, height, setbacks, landscape/streetscape, architectural design guidelines, and open space are contained in Appendix B of this EIR.

While the project would require a CPA to allow for a future residential development, the associated land use change would not conflict with the environmental goals, objectives or recommendations of the General Plan and CMCP with approval of the proposed CPA. Furthermore, although designated for commercial use, the site has never been utilized as such. Instead, publicly serving uses have occupied the property for the last 50+ years. Specifically, the Clairemont General Hospital was constructed on the site in 1961 and operated until 1989 when the site was purchased for County use. On March 1, 1994, the Board of Supervisors authorized the relocation of the Sheriff's Criminal Investigations Division (a community serving facility) to the project site, which operated on the project site until 2018. No commercial development has every occurred on the project site.

Regarding the rezone, the project site is currently zoned CO-1-2 which permits commercial uses and one dwelling unit per 1,500 SF of site area. The proposed zone change to RM-3-9 would allow for multiple unit residential with a maximum building height of 70 feet. The CPIOZ-A supplemental development regulations would be consistent with the general intent of the RM-3-9 zone as modified by the regulations contained in Appendix B. The development would also be

consistent with the intent of the RM-3-9 zone as modified by these regulations and any incentives or waivers granted pursuant to Article 3: Supplemental Development Regulations, Division 7: Affordable Housing Regulations of the SDMC and any State allowed density bonus incentives.

Therefore, re-designating and rezoning the property as proposed would not result in less commercial development occurring in the community (County of San Diego 2018) and residential development of a former public-serving use site would not result in significant physical effects on the environment because: (1) the project site is already developed with urban uses; (2) the project site is surrounded by urban uses, (3) the project would allow for infill redevelopment to replace underutilized buildings with multifamily housing; (4) the project site is located within a TPA where higher urban density in close proximity to transit is encouraged; and (5) as an affordable housing project, the project would implement the housing goals expressed in the General Plan and CMCP. Therefore, the land use and planning impacts associated with the proposed project would be less than significant.

3.4.3.2 General/Community Plan Land Use Objective/Policy Consistency

Issue 2: Would the project result in an inconsistency/conflict with the environmental goals, objectives, or guidelines of a General or Community Plan, or a substantial incompatibility with an adopted land use plan?

Impact Analysis

The City's General Plan and CMCP identify goals and policies that guide growth and development Citywide and within the Clairemont Mesa community, respectively. Most of the General Plan's goals are implemented through policy established in the CMCP. General Plan Elements that include land use-related goals and policies that apply to the project include: Land Use; Mobility; Urban Design; Public Facilities, Services, and Safety; Recreation; and Noise. CMCP Elements that include land use-related goals and policies that apply to the project include: Residential; Transportation; Open Space and Environmental Resources; Population-Based Parks and Recreation; and Community Facilities. **Table 3.4-1** identifies the land-use related goals, objectives and policies in the City's General Plan and CMCP applicable to the project, and an analysis of project consistency with them.

As indicated therein, the project would be consistent with these goals, objectives and policies, and with the General Plan City of Villages strategy described in Subsection 2.6.2 above, for reasons that include, but are not limited to:

1. The project would provide for higher density infill redevelopment of an already developed underutilized site within an urbanized area near transit in the Community Core of Clairemont Mesa;
2. The project would intensify urban development, including providing high-density residential development, within an area identified by the City's General Plan Land Use Element as having a medium propensity for village development and an area identified by SANDAG as a Community Center within an Urban Area Transit Strategy Boundary;
3. The project would be developed in accordance with all applicable CPIOZ-A supplemental development standards (e.g., height, architectural, landscaping, lighting, urban design,); and
4. The project would provide the City with much needed affordable housing that is encouraged in the General Plan and Community Plan policies.

Additionally, the project would provide transit supportive residential densities that would have access to existing and planned transit.

Table 3.4-1
Project Consistency with Applicable Land Use-Related Goals, Objectives, and Policies

Goals/Objectives/Policies	Consistency Evaluation
City of San Diego General Plan	
Land Use and Community Planning Element Applicable goals: A. <u>City of Villages Strategy</u> • Mixed-use villages located throughout the City and connected by high-quality transit.	**Consistent:** The project proposes a CPA to change the General Plan/CMCP land use designation from Commercial-Community Center to Residential-High (45-73 du/ac), and the CPIOZ from CPIOZ-B to CPIOZ-A. The project would implement the General Plan City Villages Strategy by providing high-density residential uses at the project site, which is identified as having a medium propensity for village development in the General Plan Land Use Element, is within a TPA, and within a SANDAG identified Smart Growth Opportunity Area. The project would add density within an area with access to transit due to its location adjacent to a high-frequency bus stop along Genesee Avenue near Mount Etna Drive. Lastly, the project would represent infill redevelopment on a developed site already served by public services and utilities, and would develop housing within close proximity

Goals/Objectives/Policies	Consistency Evaluation
	to existing shopping and employment opportunities.
B. General Plan Land Use Categories • Land use categories and designations that remain consistent with the General Plan Land Use Categories as community plans are updated and/or amended. C. Community Planning Goals • Community plans that maintain or increase planned density of residential land uses in appropriate locations. • Community plans that are kept consistent with the future vision of the General Plan through comprehensive updates or amendments.	**Consistent:** The CPA would change the site use and increase the planned intensity of the project site consistent with the vision of the General Plan City of Villages strategy. Therefore, implementation of the proposed CPA would be consistent with these goals. See the Consistency Evaluation for Land Use Goal D below for further discussion.
D. Plan Amendment Process • Approve plan amendments that better implement the General Plan and community plan goals and policies. • Allow for changes that will assist in enhancing and implementing the community's vision.	**Consistent:** Land Use Goal D criteria require that initiation of an amendment be based on compliance with three initiation criteria: a) appears consistent with the goals and policies of the General Plan and community plan and any community plan specific amendment criteria; b) provides additional public benefit to the community as compared to the existing land use designation, density/intensity range, plan policy or site design; and c) public facilities appear to be available to serve the proposed increase in density/intensity, or their provision will be addressed as a component of the amendment process. On December 16, 2018, the City's Planning Commission approved Planning Commission Resolution No. 4979-PC authorizing the initiation of a General Plan Amendment (GPA)/CPA and rezone as requested by the County for this project. The CPA would be consistent with the community's goals and objectives for residential development (page 11 of the CMCP). The project site is adjacent to a variety of urban uses including commercial development, multi-story office towers, an SDG&E easement, and single-family residential development beyond the SDG&E easement. The proposed CPA would not involve any changes to existing single-family zoning within the community. In fact, the CPA would encourage rehabilitation of a currently developed underutilized site and would facilitate infill redevelopment near commercial

Goals/Objectives/Policies	Consistency Evaluation
	uses and within a designated TPA. The CPA would contribute to the community's residential development objectives to provide a diversity of housing options (Objective 1 of the CMCP) and locate higher density housing near commercial areas and along transportation corridors where there are adequate services (Objective 4 of the CMCP). Multifamily development allowed by the CPA would act as a buffer between commercial areas and single-family neighborhoods to ensure the development is compatible with the existing neighborhood (Objective 3 of the CMCP). Finally, future site development consistent with the CPA would be required to provide the required amount of parking set forth by City parking regulations (Objective 5 of the CMCP). Further, the site has been developed with community/ government uses and served by public services and utilities since 1961. The EIR process for the CPA would ensure that the future site development would not overburden community or neighborhood facilities. The site developer would be required to pay any applicable fees and provide facilities adequate to meet the City's existing public services requirements (County of San Diego 2018).
Mobility Element Applicable goals: A. <u>Walkable Communities</u> • A city where walking is a viable travel choice, particularly for trips of less than one-half mile. • A safe and comfortable pedestrian environment. • A complete, functional and interconnected pedestrian network, that is accessible to pedestrians of all abilities. • Greater walkability achieved through pedestrian- friendly street, site and building design.	**Consistent:** The proposed CPIOZ-A supplemental development regulations, which outline specific requirements, are contained in Appendix B of this EIR. As indicated therein, the project shall provide for internal and external pedestrian-oriented features that provide clear, safe, and attractive connections to both on-site and surrounding uses. The specific improvement(s) will be selected and processed by the developer in concert with agreement by the City Engineer. Also, the supplemental development regulations require that street trees be planted and maintained along public street frontages to provide a shaded pedestrian environment and give a pedestrian character to the street.
B. <u>Transit</u> • An attractive and convenient transit system that is the first choice of travel for many of the trips made in the City. • Increased transit ridership.	**Consistent:** As indicated previously, the project would be located along MTS bus routes 27 and 41 that run along Genesee Avenue and Balboa Avenue in the project area, with the closest route 41 bus stop near the Mount Etna Drive/Genesee Avenue

Goals/Objectives/Policies	Consistency Evaluation
	intersection, approximately 175 feet east of the project site. ~~The project would reduce regional vehicle miles travelled (VMT) by taking advantage of being in a planned TPA (Chen Ryan 2019).~~
F. Bicycling • A city where bicycling is a viable travel choice, particularly for trips of less than five miles. • A safe and comprehensive local and regional bikeway network.	**Consistent:** There are currently no bicycle facilities directly accessing the project site on Mount Etna Drive. However, Class II Bike lanes are provided on both sides of Genesee Avenue, and the bike lane on the west side of Genesee Avenue fronting the project site would be retained under the project (Chen Ryan 2019). Furthermore, secure bicycle parking within the community would be required by the project's TDM program (Chen Ryan 2019).
Urban Design Element Applicable goals: A. General Urban Design • A built environment that respects San Diego's natural environment and climate. • An improved quality of life through safe and secure neighborhoods and public places. • A City with distinctive districts, communities, neighborhoods, and village centers where people gather and interact. • Utilization of landscape as an important aesthetic and unifying element throughout the City.	**Consistent:** The project would include multiple urban design elements to ensure that the project respects the City's natural environment and climate, improves quality of life through safe and secure public places, provides distinctiveness where people would gather and interact, and utilize landscaping as an aesthetic and unifying element. The project would do so through the proposed supplemental development regulations included in Appendix B of this EIR that require: (1) Community accessible active ground floor space oriented towards the fronting public streets; (2) Building setbacks intended to encourage pedestrian scale and compatibility with adjacent uses; (3) Landscape screening of any surface parking directly adjacent to public rights-of-way; (4) Landscaping of the project site, and the planting of street trees along public street frontages to provide a shaded pedestrian environment; (5) Building articulation that diminishes the appearance of mass and bulk, and that creates visual interest as viewed at the pedestrian scale; (6) Screening and fencing of storage areas, ground-level and rooftop mechanical equipment, and maintenance areas;

Goals/Objectives/Policies	Consistency Evaluation
	(7) Residential open space, including: private (balcony, patio, or roof terrace) exterior open space; and (8) Lastly, it is noted that the project site is currently developed with generic office buildings that feature a minimum of articulation, landscaping, and urban design features. The project would replace the existing buildings with new buildings with high quality architecture and articulation, along with pedestrian facilities, landscaping and open space, all of which would improve the aesthetics of the site. The design of the future development would be subject to the standards in the CPIOZ-A and reviewed for compliance during the building permit process.
B. Distinctive Neighborhoods and Residential Design • Innovative design for a variety of housing types to meet the needs of the population. • Infill housing, roadways and new construction that are sensitive to the character and quality of existing neighborhoods.	**Consistent:** See the Consistency Evaluations for: General Plan Land Use and Community Planning Element Goal 1 above; Urban Design Element Goal A above; and CMCP Residential Objective 1 below.
Public Facilities, Services, and Safety Element Applicable goals: D. Fire-Rescue • Protection of life, property, and environment by delivering the highest level of emergency and fire- rescue services, hazard prevention, and safety education.	**Consistent:** As described in Section 3.6, Public Services, of this EIR, the project would not necessitate the construction of additional fire protection facilities. Additionally, the project would be constructed in accordance with City Building and Fire Code requirements, and would contribute funding to maintain fire protection services provided by the City through payment of Development Impact Fees (DIFs) that would be required prior to issuance of building permits.
E. Police • Safe, peaceful, and orderly communities. • Police services that respond to community needs, respect individuals, develop partnerships, manage emergencies, and apprehend criminals with the highest quality of service.	**Consistent:** As described in Section 3.6, Public Services, of this EIR, the project would not necessitate the construction of additional police protection facilities. Additionally, the project would be constructed in accordance with City lighting and security requirements, and would contribute funding to maintain police protection services provided by the City through payment of DIFs that would be required prior to issuance of building permits.

Goals/Objectives/Policies	Consistency Evaluation
F. Wastewater • Environmentally sound collection, treatment, re-use, disposal, and monitoring of wastewater.	**Consistent:** All sewer facilities would be designed in accordance with the Sewer Design Guide (2013) by the Metropolitan Wastewater Department, City of San Diego. Furthermore, as described in Section 3.8, Utilities and Service Systems, of this EIR, the project would not overburden existing wastewater collection and treatment facilities. Lastly, the project would include residential uses that generate standard municipal sewage. It would not include uses that generate sewage with constituents that could potentially interfere with the ability of the local wastewater treatment plant to meet its treatment and discharge requirements.
G. Storm Water Infrastructure • Protection of beneficial water resources through pollution prevention and interception efforts. • A storm water conveyance system that effectively reduces pollutants in urban runoff and storm water to the maximum extent practicable.	**Consistent:** As indicated in Section 5.2.5, Hydrology of this EIR, project grading activities during construction could temporarily increase the amount of sediment in runoff, which could enter the existing storm drain system and outfall to coastal waters. However, project construction activities would be subject to the requirements of the Construction General Permit and a Stormwater Pollution Prevention Plan (SWPPP) that would ensure that construction activities would not degrade the surface water quality of receiving waters to levels below the standards of the San Diego Regional Water Quality Control Board (RWQCB) and other regulatory agencies. In addition, the project would not substantially increase surface water runoff or the concentration of pollutants in that runoff during operation because: (1) the project site is already developed with impervious urban uses; and (2) additional Best Management Practices (BMPs) would be implemented, as required, to control urban pollutants in runoff from the project.
I. Waste Management • Maximum diversion of materials from disposal through the reduction, reuse and recycling of wastes to the highest and best use.	**Consistent:** As indicated in Section 3.8, Utilities and Service Systems, of this EIR, the project would comply with all applicable solid waste separation, recycling, and diversion requirements during both construction and operation, consistent with the regulatory requirements.

Goals/Objectives/Policies	Consistency Evaluation
M. Public Utilities • Public utilities that sufficiently meet existing and future demand with facilities and maintenance practices that are sensible, efficient and well-integrated into the natural and urban landscape.	**Consistent:** The project would have access to all utilities as described in Sections 3.2, Energy, and 3.8, Utilities and Service Systems, of this EIR. The project is an existing developed site and connected to the existing facilities in the surrounding streets, and the project would provide any additional upgrades and/or connections that may be required.
Q. Seismic Safety • Protection of public health and safety through abated structural hazards and mitigated risks posed by seismic conditions. • Development that avoids inappropriate land uses in identified seismic risk areas.	**Consistent:** As indicated in Section 5.2.4, Geology, Soils, and Seismicity, of this EIR, the project site is not at risk of fault rupture of a known Alquist-Priolo Fault. Furthermore, while the project site is located in the seismically active Southern California area, including in State-designated Seismic Zone 4 that is the highest seismic zone, compliance with applicable California Building Code (CBC) seismic safety requirements would ensure protection of public health and safety and structures are not at risk due to seismic conditions.
Historic Preservation Element Applicable goals: A. Identification and Preservation of Historical Resources • Identification of the historical resources of the City. • Preservation of the City's important historical resources.	**Consistent:** As indicated in Section 5.2.3, Cultural Resources of this EIR, the existing on-site buildings were constructed as the Clairemont General Hospital in 1961 and are not currently designated as historical resources in the California Register of Historical Resources, and do not qualify as such. Therefore, their demolition under the proposed project would not conflict with the City's goal to identify and preserve historical resources in the City.
Recreation Element Applicable goals: F. Open Space Lands and Resource-Based Parks • A system of pedestrian, bicycle and equestrian paths linking communities, neighborhoods, parks, and the open space system.	**Consistent:** See the Consistency Evaluations for General Plan Mobility Element Goals A and F above.
Conservation Element Applicable goals: A. Climate Change and Sustainable Development • To reduce the City's overall carbon dioxide footprint by improving energy efficiency, increasing use of alternative modes of transportation, employing sustainable planning and design	**Consistent:** The project is proposed in a planned TPA where transit service exists and is planned in the future. The project would implement a TDM program to reduce single-occupant motor vehicle trips, and encourage use of alternative transportation, as much as possible (Chen Ryan 2019). Therefore, the project would reduce regional vehicle miles travelled (VMT) by taking advantage of being in a TPA (Chen Ryan 2019). All of these

Goals/Objectives/Policies	Consistency Evaluation
techniques, and providing environmentally sound waste management.	conditions would minimize the project's production of mobile source GHG emissions. The future development project that would be allowed under the proposed project would be required to prepare a CAP Consistency Checklist and incorporate design features that minimize its GHG emissions into the final project plans as a condition of approval for the building permit. In addition, the project would be built as a Leadership in Energy and Environmental Design (LEED) Silver or equivalent, which would minimize its carbon footprint through the integration of environmentally sensitive design features focused on minimizing energy usage, water demands, waste production, etc. Additional consistency discussion is presented under Conservation Element Goal D, Water Resources Management.
C. Coastal Resources • Clean coastal waters by continuing to improve the quality of ocean outfall discharges.	**Consistent:** See the Consistency Evaluation for General Plan Public Facilities, Services, and Safety Element Goal G above.
D. Water Resources Management • Effective long-term management of water resources so that demand is in balance with efficient, sustainable supplies.	**Consistent:** The future development project would be built as a LEED Silver or equivalent. Because no specific development plan is proposed, a LEED checklist has not been completed at the time of this analysis. Although exact measures and credits are unknown, the LEED checklist includes requirements for indoor and outdoor water use reduction. By adhering to LEED Silver or equivalent standards, the future residential infill development would be required to include water conservation features, including but not limited to using drought resistant landscaping and low flow plumbing fixtures. By adhering to LEED Silver or equivalent standards, the future residential development would be required to reduce its water use, and would not use excessive amounts of water.
E. Urban Runoff Management • Protection and restoration of water bodies, including reservoirs, coastal waters, creeks, bays and wetlands. • Preservation of natural attributes of both the floodplain and floodway without endangering life and property.	**Consistent:** With regard to the quality of stormwater runoff from the project site, see the Consistency Evaluation for General Plan Public Facilities, Services, and Safety Element Goal G above. With regard to the preservation of natural attributes of floodplains and floodways without endangering life or property, as indicated in Section 5.2.5, Hydrology, of this EIR, the

Goals/Objectives/Policies	Consistency Evaluation
	project site is not located within a Federal Emergency Management Agency (FEMA) designated 100-year floodplain or floodway.
F. Air Quality • Regional air quality that meets state and federal standards. • Reduction in greenhouse gas emissions effecting climate change.	**Consistent:** As described in Section 2.1, Air Quality, of this EIR, the project would be consistent with all regional, state and federal air quality and GHG standards.
I. Sustainable Energy • An increase in local energy independence through conservation, efficient community design, reduced consumption, and efficient production and development of energy supplies that are diverse, efficient, environmentally-sound, sustainable, and reliable.	**Consistent:** As detailed in Section 3.2, Energy, of this EIR, the project would implement a number of energy efficiency features in compliance with Title 24 CALGreen Code regulations, which include measures such as energy efficiency, water conservation, material conservation, planning and design, and overall environmental quality. With the implementation of these measures, the project would utilize energy in a sustainable fashion.
Clairemont Mesa Community Plan	
Residential Objectives 1. Provide a diversity of housing options in selected locations of the community.	**Consistent:** According to current SANDAG estimates, the majority of residential development within the CMCP consists of single-family detached residential (62 percent) (SANDAG 2016c). The project would develop 404 affordable multi-family housing units that would increase residential diversity by providing residential options other than single-family detached housing units. The project would also provide the City with much needed affordable housing.
3. Provide development guidelines to help ensure that new development is compatible with the existing neighborhood and does not overburden community or neighborhood facilities.	**Consistent:** The project proposes supplementary development guidelines (Appendix B of this EIR) to help ensure that project development is compatible with the existing neighborhood. See the Consistency Evaluation for General Plan Urban Design Element Goal A above for additional discussion. In addition, while the project would include a CPA and rezone, these changes would be consistent with the City's Village Strategy and residential development objectives, and would not overburden community or neighborhood facilities. See the Consistency Evaluation for General Plan Land Use and Community Planning Element Goals A and D above for additional discussion.

Goals/Objectives/Policies	Consistency Evaluation
4. Locate higher density housing near the commercial areas and along transportation corridors where there are adequate services.	**Consistent:** See the Consistency Evaluation for General Plan Land Use and Community Planning Element Goals A and D above.
5. Provide adequate off-street parking.	**Consistent:** See the Consistency Evaluation for General Plan Mobility Element Goal G above.
Transportation Objectives 1. Improve the street system as necessary to accommodate the community's growth while minimizing adverse effects on existing residential, industrial, and commercial uses and the open space system.	**Consistent:** The project would improve roadway frontage as described in the Consistency Evaluation for General Plan Urban Design Element Goal A. No open space would be impacted by the project as the site is already developed with urban uses.
2. Develop a bicycle system that will join parks and recreational areas, schools and commercial activity centers in the community and City.	**Consistent:** See the Consistency Evaluation for General Plan Mobility Element Goal F above.
3. Provide an efficient and high level of public transit within and surrounding the community. Design and plan land uses that will support and make use of the future light rail transit.	**Consistent:** The project proposes a CPA to change the land use designation to Residential–High (45-73 du/ac) and the CPIOZ from CPIOZ-B to CPIOZ-A. While the project would not be located along a light rail transit line (the planned Mid-Coast Light Rail Transit line would be located approximately 2 miles to the west), Implementation of the CPA would be consistent with the General Plan City Villages Strategy that intends to integrate housing, employment, civic, and transit uses. Furthermore, the project would intensify residential uses at the project site which is identified as having a medium propensity for village development in the General Plan Land Use Element, and is located within both a 2035 TPA and a SANDAG identified Smart Growth Opportunity Area and along MTS bus routes 27 and 41.
4 Enhance pedestrian circulation, particularly between higher density residential and commercial areas and to active and passive recreation facilities.	**Consistent:** See the Consistency Evaluation for General Plan Mobility Element Goal A above.
6. Minimize adverse noise impacts.	**Consistent:** As detailed in Section 2.3, Noise, while the proposed project would result in a temporary increase in ambient noise levels above existing conditions at off-site sensitive receivers during project construction, Mitigation Measure NOI-1 would reduce impacts to less than significant.

Goals/Objectives/Policies	Consistency Evaluation
Open Space and Environmental Resources Objectives 2. Reduce runoff and the alteration of the natural drainage system.	**Consistent:** As indicated in Section 5.2.5, Hydrology, of this EIR, the project site is already fully developed with and surrounded by urban uses, with stormwater runoff entering the local municipal storm drain system via inlets in the adjacent streets. This drainage pattern would be retained under the proposed project. Furthermore, no natural drainage features (streams, rivers, etc.) currently bisect or are located adjacent to the project site, and the project would not affect any such features. With regard to the quantity of stormwater runoff from the project site, because the project site is fully developed, the project would not appreciably increase impervious surfaces on, or stormwater runoff from, the project site during operation. During construction, the project could temporarily alter drainage conditions at the project site; however, a SWPPP would be implemented during construction to control runoff and avoid on- and off-site flooding during the construction period.
7. Protect the resource value of artifacts and paleontological remains and the community's heritage for future generations.	**Consistent:** As indicated in Section 5.2.4, Cultural Resources, of this EIR, project site preparation activities during construction would involve ground-disturbing activities that would have the potential to encounter unknown buried archaeological resources. However, since the project site has been previously graded, ground-disturbing activities associated with the project would be expected to encounter artificial fill rather than native soils that would have the potential to contain archaeological resources. Furthermore, the depth of grading is anticipated to be relatively limited as only sheet grading for drainage purposes would be required. As such, the project area would have an extremely low potential for the presence of archaeological resources as defined in CEQA Guidelines Section 15064.5, and the impact to archaeological resources would be less than significant. For similar reasons, there would be no potential to encounter paleontological resources during project construction, and no impact to paleontological resources would occur as noted in Section 5.2.4, Geology, Soils and Seismicity, of this EIR.

Goals/Objectives/Policies	Consistency Evaluation
Population-Based Parks and Recreation Objectives 3. Increase recreational opportunities in new residential and commercial development.	**Consistent:** The proposed supplemental development regulations included in Appendix B of this EIR require that the project include: (1) Residential open space, including: private (balcony, patio, or roof terrace) exterior open space for at least 50 percent of all residential units; and (2) Common indoor or outdoor open space, including passive and active recreation space with amenities (e.g., tables, benches, trees, shrubs, spas, fitness circuits, etc.). Furthermore, the site developer would be required to pay any applicable fees and provide facilities adequate to meet the City's existing public services requirements (County of San Diego 2018).
Community Facilities Objectives 3. Maintain water and sewer facilities to adequately serve the community.	**Consistent:** As described in Section 3.8, Utilities and Service Systems, of this EIR, the project would not overburden existing water and sewer facilities.

SOURCE: ESA, May 2019.

3.4.3.2 Consistency with Adopted Environmental Plans

Issue 3: Would the project result in inconsistency/conflict with adopted environmental plans for an area?

Impact Analysis

The project site is not located within an area covered by the City's Multiple Species Conservation Program (MSCP) Subarea Plan or other approved local, regional, or state habitat conservation plans (HCPs). The project site is also not located within and does not contain natural open space, is not located adjacent to areas subject to any adopted HCPs, and is not bisected by or located adjacent to a watercourse or riparian habitat. The project site is currently fully developed with urban uses, and is surrounded on all sides by urban development. Furthermore, the project site is not located within a Federal Emergency management Agency (FEMA) designate 100-year floodplain or a SDMC-designated Special Flood Hazard Area. Therefore, the project would not result in an inconsistency/conflict with adopted environmental plans for the area, and the impact would be less than significant.

3.4.4 Cumulative Impact Analysis

The geographic context for the analysis of cumulative impacts related to land use and planning is the Clairemont Mesa community. Overall, projects that are consistent with the environmental goals, objectives, and policies of a General/Community Plan, and would not result in significant effects on the environment associated with requested deviations to existing regulatory requirements, would have less than significant land use impacts. As indicated in Chapter 1.0, Project Description, of this EIR, 12 cumulative projects are located in the general vicinity of the proposed project. These cumulative projects could, along with the proposed project, result in cumulative land use impacts. However, such impacts would not lead to significant physical effects on the environment that are cumulative in nature because all future projects that develop within the project area would be subject to City land use regulations, including the General Plan, CMCP, and LDC.

The project site is currently designated as Commercial Employment, Retail, and Services in the General Plan and as Commercial-Community and CPIOZ-B in the CMCP, and is currently zoned CO-1-2. As detailed in the impact analysis for the project above, while the project would require a CPA and zone change, the proposed land use changes would not conflict with environmental goals, objectives, or recommendations of the General Plan or CMCP. Additionally, while the project is requesting deviations from selected development regulations, none of the proposed deviations would result in significant physical effects on the environment. Hence, project land use and planning impacts would be less than significant.

Therefore, the project would not have a cumulatively considerable effect on land use, and cumulative land use and planning impacts would be less than significant.

3.4.5 Significance of Impacts Prior to Mitigation

Less than significant.

3.4.6 Mitigation

No mitigation measures are required.

3.4.7 Conclusion

The project would result in less than significant land use and planning impacts.

3.5 Population and Housing

This section provides an assessment of potential impacts related to population and housing that could result from project implementation. Potential impacts addressed in this section include the project's potential to directly, through the construction of additional housing, or indirectly, through the creation of new employment opportunities or the extension or expansion of residential-related infrastructure, result in population growth in the project area.

Comments related to population and housing received during the public comment period for the Notice of Preparation (NOP) included concerns regarding density and substantial population increase in the community of Clairemont Mesa within the city of San Diego. These concerns have been considered and addressed, as applicable, in the following evaluation of the project's potential to impact population growth. The NOP and all comment letters received in response to the NOP are included in Appendix A of this EIR.

3.5.1 Existing Conditions

The proposed project is located within the community of Clairemont Mesa, which is located in the central portion of the city of San Diego. The city encompasses over 342.5 square miles, spans nearly 40 miles north to south and is bounded by the Pacific Ocean, and the cities of Del Mar, Coronado and Imperial Beach to the west, Mexico to the south, the cities of Solana Beach, Escondido, and the unincorporated community of Rancho Santa Fe to the north, and the cities of Poway, Santee, El Cajon, Lemon Grove, Le Mesa, and unincorporated areas of San Diego County to the east.

The community of Clairemont Mesa is bound by Interstate 5 (I-5) to the west, State Route 52 (SR 52) to the north, Interstate 805 (I-805) to the east, and an irregular boundary that roughly follows the Tecolote Canyon Natural Park and Nature Center area across Genesee Avenue to I-805. The community of Clairemont is comprised of three major subareas, which consists of Bay Ho, North Clairemont, and Clairemont. The project site is located in the Clairemont subarea of the community.

3.5.1.1 Population

The San Diego Association of Governments (SANDAG) provides updated population/demographics and housing estimates and projections for the San Diego region annually. Since the community of Clairemont Mesa is a community planning area within the city of San Diego, the population estimates for both the community and the city are provided in this analysis. **Table 3.5-1** summarizes population trends for the community of Clairemont Mesa and the city of San

Diego from the year 2000 to 2016 and provides population projections for the next 30 years.

Table 3.5-1
Population Trends and Projections for the Community of Clairemont and City of San Diego

	2000	2010	2016	% Change 2000–2016	2020	2035	2050	% Change 2020–2050
Community of Clairemont Mesa	78,310	77,922	80,337	2.9%	81,498	86,765	94,965	16.5%
City of San Diego	1,223,400	1,301,617	1,391,676	13.8%	1,453,267	1,665,609	1,777,936	22.3%

Sources: SANDAG 2003a, 2003b, 2010a, 2010b, 2013a, 2013b, 2017a, and 2017b; City of San Diego 2019.

As shown in Table 3.5-1, the community's population has varied over the years, reflecting a decrease during the economic downturn in the late 2000s (and the job loss that took place throughout the United States and California) and its more recent current increase. The population of the community of Clairemont Mesa increased by 2,295 residents from 2000 to 2016, which represents an increase of approximately 2.9 percent (SANDAG 2003a, 2017a). As of January 1, 2016, the total population in the community of Clairemont Mesa was 80,337 residents, which is forecasted to increase to 81,498 residents by 2020 (SANDAG 2013a, SANDAG 2017a, City of San Diego 2019). SANDAG also forecasts Clairemont Mesa's population to continue to grow to over the next 30 years to a total population of 94,965 residents, which would equate to an increase of approximately 16.5 percent from 2020 levels (SANDAG 2013a).

Similar to the overall population trends for the community of Clairemont Mesa, the city of San Diego has also experienced population growth within the last 20 years. Since 2000, the city's population has increased from 1,223,400 residents to 1,391,676 residents in 2016, which represents an increase of approximately 13.8 percent (SANDAG 2003b, 2017b). The city's population is anticipated to continue to grow substantially over the next 30 years, with the city's total population anticipated to reach 1,777,936 residents by 2050, which represents an increase of approximately 22.3 percent over 2020 levels (SANDAG 2013b).

3.5.1.2 Housing

According to the City of San Diego 2018 Housing Inventory Annual Report, the City has been identified as one of the least affordable cities in the United States (City of San Diego 2018). The report states that while the City is actively taking steps to increase housing production, the market is still not keeping up with demand, which is especially true in very-low and low-income housing, and even more so in moderate-income housing. To accommodate the city's growing population and continued economic development, housing production must meet both present and future demands. Housing is a critical component to employment retention, recruitment, and cost.

Table 3.5-2 summarizes housing trends for the community of Clairemont Mesa and the city of San Diego over roughly the last 20 years as well as provides housing projections for the next 30 years. As shown in Table 3.5-2, housing stock in the community of Clairemont Mesa increased by 171 units between 2000 and 2016, or by approximately 0.5 percent (SANDAG 2003a, 2013a). While the housing stock has gradually increased over the last 20 years, SANDAG projects, based on currently adopted plans, that the housing stock in Clairemont Mesa will increase by 5,470 units from 2020 to 2050, which represents an increase of 16.3 percent (SANDAG 2013a).

Table 3.5-2
Housing Units and Projections for the Community of Clairemont and City of San Diego

	2000	2010	2016	% Change 2000–2016	2020	2035	2050	% Change 2020–2050
Community of Clairemont	32,759	32,905	32,930	0.5%	33,490	35,234	38,960	16.3%
City of San Diego	469,689	515,412	528,114	12.4%	559,143	640,668	695,703	24.4%

Sources: SANDAG 2003a, 2003b, 2010a, 2010b, 2013a, 2013b, 2017a, and 2017b.

Similar to the housing trends in Clairemont Mesa, the city also experienced growth in the total number of housing units between 2000 and 2016. The city housing stock increased by 58,425 units or approximately 12.4 percent from 2000 to 2016 (SANDAG 2003b, 2013b). SANDAG projects that this growth trend for the city's housing stock will continue with an additional 136,560 units or an increase of approximately 24 percent from 2020 to 2050 (SANDAG 2013b).

3.5.2 Regulatory Setting

3.5.2.1 Federal

There are no applicable federal regulations related to population and housing.

3.5.2.2 State

California Government Code

State law mandates each County and City to plan for enough housing to meet projected growth in California through the preparation of a Housing Element in its General Plan. The purpose of the Housing Element is to identify the community's housing needs; state the community's goals and objectives with regard to housing production, rehabilitation, and conservation to meet those needs; and define the policies and programs that the community will implement to achieve the stated goals and objectives. The City of San Diego General Plan Housing Element 2013–2020 was adopted by the City on March 4, 2013 (City of San Diego 2013). Applicable information from the Housing Element is included below under the discussion of pertinent local regulations.

3.5.2.3 Regional

San Diego Association of Governments Regional Comprehensive Plan

SANDAG's Regional Comprehensive Plan (RCP) serves as the long-term planning framework for the San Diego region. The primary goals of the RCP are to improve the standard of living, enhance the quality of life, promote social and economic equity, and improve the region's sustainability and encourage "smart growth." Issues addressed in the RCP include urban form, transportation, housing, healthy environment, economic prosperity, public facilities, and border issues.

San Diego Association of Governments 2050 Regional Transportation Plan

SANDAG's 2050 Regional Transportation Plan/Sustainable Communities Strategy (2050 RTP/SCS) seeks to guide the San Diego region toward a more sustainable future by integrating land use, housing, and transportation planning to create communities that are more sustainable. The building blocks of the SCS include a land use pattern that accommodates our region's future employment and housing needs, and protects sensitive habitats and resource areas. The primary objective of the 2050 RTP/SCS is to increase mobility for the region's residents by providing a safe and reliable regional transportation system as well as to foster sustainable development throughout the region.

San Diego Association of Governments San Diego Forward: The Regional Plan

SANDAG's Regional Plan serves as a comprehensive planning guide, focusing on growth through the year 2050. It integrates the RCP and RTP/SCS. The RCP, adopted in 2004, provides key principles for managing the region's growth while preserving natural resources and limiting urban sprawl. The plan covers eight policy areas including urban form, transportation, housing, healthy environment, economic prosperity, public facilities, borders, and social equity. These policy areas are addressed in the 2050 RTP/SCS and are now fully integrated into the Regional Plan. The Regional Plan establishes the importance of providing adequate housing for a growing number of people, from all income levels and at all stages of their lives, as one of the major goals for the region.

San Diego Association of Governments Series 13 Regional Growth Forecast

The SANDAG Series 13: 2050 Regional Growth Forecast serves as the foundation for the San Diego Forward: Regional Plan and other planning documents across the region. The 2050 Regional Growth Forecast includes an overview of the regional demographic, economic, and housing trends expected by 2050.

San Diego Association of Governments Regional Housing Needs Assessment 2010–2020

The California Department of Housing and Community Development (HCD) is mandated to determine the statewide housing need. In cooperation with HCD, local governments and councils of government are charged with determining a city's or region's existing and projected housing need as a share of the statewide housing need. SANDAG is responsible for preparing the Regional Housing Needs Assessment (RHNA) for the San Diego region (18 cities and the County of San Diego). SANDAG adopted the most recent RHNA in October 2011, which is for the fifth Housing Element cycle (January 2013 through December 2020) and covers an eleven-year projection period (2010 through 2020). SANDAG is currently in the process of updating their RHNA for the sixth Housing Element cycle (2021 through 2028), which is anticipated to be adopted by early 2020.The RHNA identifies housing needs for very low income, low income, moderate income, and above moderate income groups in each jurisdiction within the SANDAG region and allocates the amount of housing needed in each jurisdiction for the housing element cycle.

The current RHNA indicates that the San Diego region needs to supply an additional 161,980 housing units in the region to accommodate growth between 2010 to 2020 (SANDAG 2011). Of the total 161,980 additional housing units required in the San Diego region by 2020, the city of San Diego is responsible for providing a total of 88,096 additional housing units by 2020 (SANDAG 2011).

Table 3.5-3 summarizes the breakdown of the RHNA allocations for both the City and San Diego region.

Table 3.5-3
San Diego Region Regional Housing Needs Assessment Allocation and Progress

	Total Units	Very Low	Low	Moderate	Above Moderate
RHNA Allocation					
City of San Diego	88,096	21,977	16,703	15,462	33,954
San Diego Region	161,980	36,450	27,700	30,610	67,220
Actual Housing Production (Units) of New Construction (2010-2017)					
City of San Diego	33,159	2,009	2,401	33	28,716
Percent of RHNA Achieved	38 percent	9 percent	14 percent	0.2 percent	85 percent
Total Remaining RHNA	54,937	19,968	14,302	15,429	5,238

SOURCES: SANDAG 2011, City of San Diego 2018.

As shown in Table 3.5-3, of the City's allocation of 88,096 additional housing units, 21,977 housing units need to be provided for the very low income bracket, 16,703 housing units need to be provided for the low income bracket, 15,462 housing units for the moderate income bracket, and 33,954 housing units for the above moderate bracket (SANDAG 2011).[1] According to the City's 2018 Housing Inventory Annual Report, from 2010 through 2017, the City constructed a total of 33,159 housing units, including 2,009 units at the very low income bracket, 2,401 at the low income bracket, 33 at the moderate income bracket, and 28,716 at the above moderate bracket, totaling approximately 38 percent of the total RHNA allocation (City of San Diego 2018).

3.5.2.4 Local

City of San Diego General Plan

The City of San Diego General Plan Housing Element 2013-2020 was adopted by the City Council in 2013. The Housing Element serves as a policy guide to address the comprehensive housing needs of the city. The following policies related to population and housing are relevant to the proposed project.

[1] Very low and low income brackets are defined by Sections 50105 and 50079.5 of the California Health and Safety Code, respectively.

Policy HE-B.5: Emphasize the provision of affordable housing in proximity to emerging job opportunities throughout the City of San Diego. Jobs/housing linkages should be considered through the community plan update process. This desired linkage should be reflected through appropriate land use designations and zoning.

Policy HE-I.4: The City's highest housing priority shall be to provide housing for very low- and low-income families and special needs populations.

Clairemont Mesa Community Plan

The Clairemont Mesa Community Plan (CMCP) provides polices and information specific to the community planning area of Clairemont Mesa (City of San Diego 2011). The CMCP outlines various population-based improvements and goals, such as increasing recreation and parks with increased population and providing commercial uses and residential units to accommodate population growth in the community. According to the adopted CMCP, future development of the vacant residential land and redevelopment opportunities within the community could result in an addition of 1,100 dwelling units (not including mixed-use development), totaling 33,000 dwelling units or a three percent increase over the existing housing stock in the 15 years after the existing Community Plan was adopted (City of San Diego 2011). In January 2017, the City of San Diego initiated a comprehensive update to the CMCP, which is currently ongoing, and is expected to allocate more residential housing to the community.

3.5.3 Analysis of Project Effects and Determination as to Significance

For purposes of this EIR, the identified significance thresholds are based on criteria provided in Appendix G of the California Environmental Quality Act (CEQA) Guidelines. Accordingly, a significant population and housing impact would occur if the project would:

Issue 1: Induce substantial unplanned population growth in an area, either directly or indirectly; or

Issue 2: Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

As detailed in Chapter 5.0, Other CEQA Considerations, the project would have no impact regarding Issue 2 as the project site currently does not contain any residential structures and therefore, would not displace existing residents or housing. For a brief discussion on why this issue area was not further evaluated in this section, refer to Chapter 5.0, Other CEQA Considerations, of this EIR.

3.5.3.1 Unplanned Population Growth

Issue 1: Would the project induce substantial unplanned population growth in an area, either directly or indirectly?

Impact Analysis

Community Plan Amendment and Rezone

A project has the potential to directly induce unplanned population growth through the construction of additional housing, or indirectly through the creation of new employment opportunities or the extension or expansion of residential-related infrastructure. The project's direct and indirect potential to induce population growth is described below under Issue 1.

The project includes an amendment to the CMCP and a rezone for the project site that would change the underlying land use designation and zone from C0-1-2 to RM-3-9 to allow for a future development at a maximum of 404 multifamily dwelling units (refer to Chapter 1.0, Project Description, for additional details). While a future residential development on the project site could propose less units, for the purposes of CEQA the following analysis evaluates the most conservative scenario of full buildout allowed under the amendment to the Community Plan and rezone.

According to the American Community Survey from SANDAG, the community of Clairemont Mesa had an average multi-family person per household size of 2.05 people (City of San Diego 2019). Assuming an average household size of 2.05 people, maximum buildout of 404 units allowed by the project has the potential to generate an additional 829 people in Clairemont Mesa. As shown in Table 3.5-1 above, population growth in the community of Clairemont Mesa is forecasted to increase by 16.5 percent from 81,498 residents in 2020 to 94,965 residents in 2050 (SANDAG 2013a). Of the increase of 13,467 residents anticipated in Clairemont Mesa, the 829 residents that could be generated by the project would account for approximately 6.2 percent of that projected population increase.

While the proposed project would result in population growth, this growth has already been accounted for in the City's Housing Element and SANDAG's growth projections for the Clairemont Mesa community, where the environmental impacts of such growth were analyzed under those plans' CEQA documents. Thus, the population growth associated with the proposed residential use would be well within the anticipated population growth for the community of Clairemont Mesa and would not exceed the projections on which the City and SANDAG have based plans related to the provision of public services, utilities, and other amenities to maintain the current quality of life it provides to its residents.

In addition, the future residential development that would be allowed by the project is not intended to draw new residents to the area but would rather provide an affordable housing option for residents already residing in the area. The goal of the project is to increase the affordable housing stock within the San Diego region to accommodate the existing population in accordance with the goals established by the RHNA. As shown in Table 3.5-3, as of 2017, the City has only achieved 38 percent of RHNA allocated units, including construction of only 14 percent of low-income units and less than one percent of moderate income units. The proposed project would allow for the development of low to moderate income housing units, providing the City with more housing options for existing residents already residing in the area. Therefore, proposed future residential development allowed under the project would not directly induce substantial unplanned population growth in the community of Clairemont Mesa or the City.

In order to support the proposed 404 residential units proposed for the future development, maintenance personnel and property management staff would be needed during operation of the future development. However, such a use would generate a relatively small number of employees and would not support a large employment staff. In addition, it is anticipated that the majority of the employees would be drawn from within the region's existing employment base and would not require new workers to move to the project area. Therefore, the proposed project would not draw new residents to the area looking for new employment opportunities and as such, would not indirectly induce unplanned population growth.

Site Demolition and Preparation

In conjunction with the amendment to the Community Plan and a rezone to allow for a future residential development, the project would include the demolition of the existing unoccupied buildings and related facilities on-site, disposal of the demolition debris, and mass grading of the site in preparation for future residential construction. Since this aspect of the project would not result in the construction of new housing units, this project component would not directly induce unplanned population growth. However, this project component would require construction workers necessary to implement the demolition and site preparation activities.

However, it is anticipated that construction workers would be drawn from the local and regional work force. As site demolition and preparation would occur for approximately five months, only short-term construction employment would be necessary, and it is assumed construction workers would not be required to relocate from outside the region. The City's existing seasonal and occasional housing stocks would be sufficient to house temporary construction workers, if needed, in addition to local hotel establishments. Therefore, this project component would not indirectly induce unplanned population growth in Clairemont Mesa.

In summary, the increase in residential units that would be allowed for by the project would help to meet regional and local housing demands from projected population growth in the city and the region, specifically the demand for affordable housing units. The project would not result in a substantial direct or indirect increase in population. Therefore, impacts related to unplanned population growth would be less than significant.

3.5.4 Cumulative Impact Analysis

The geographic context for the analysis of cumulative impacts associated with population and housing is the community of Clairemont Mesa. The project has the potential to generate an additional 829 residents and limited new employment opportunities in the project area. Similar to the project, other cumulative projects have the potential to generate population growth either through the construction of new housing units or by providing new employment opportunities in the area. As shown in Table 1-2, there are two cumulative development projects, Jefferson Pacific Beach and The Summit at MB – EOT, which would construct a total of 348 new residential units. Using an average household size of 2.05 persons per household, these projects would increase the population by approximately 714 residents, or 1,543 residents including the proposed project. As shown in Table 3.5-1 above, population growth in the community of Clairemont Mesa is forecast to increase by 16.5 percent from 81,498 residents in 2020 to 94,965 residents in 2050 (SANDAG 2013a). Of the increase of 13,467 residents anticipated in Clairemont Mesa, the 1,543 residents that could be generated by the project plus cumulative projects would account for approximately 11 percent of that increase. While the cumulative projects would result in population growth, this growth within the Clairemont Mesa community has already been accounted for in the City's Housing Element and SANDAG's growth projections, where the environmental impacts of such growth were analyzed under those plans' CEQA documents. Thus, the population growth associated with the cumulative projects would be well within the anticipated population growth for the community of Clairemont Mesa and would not exceed the projections on which the City and SANDAG have based plans related to the provision of public services, utilities, and other amenities to maintain the current quality of life it provides to its residents. Therefore, cumulative impacts related to population and housing would be less than significant.

3.5.5 Significance of Impacts Prior to Mitigation

Impacts related to population and housing would be less than significant.

3.5.6 Mitigation

No mitigation measures are required.

3.5.7 Conclusion

While the proposed project has the potential to increase the residential population by up to 829 residents in the project area, this growth would be well within the anticipated population growth for the community and city. In addition, the population growth would not exceed the projections within the community on which the City has based plans related to the provision of public services, utilities, and other amenities to adequately serve its residents. Furthermore, the proposed project would not induce population growth beyond what is already projected for the city. Therefore, impacts related to substantial unplanned population growth, either directly or indirectly, would be less than significant.

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3.6 Public Services

This section provides an assessment of the potential impacts related to public services that could result from implementation of the proposed project. Potential impacts addressed in this section are associated with fire protection/life safety, police protection, schools, libraries, and maintenance of public facilities, including roads. An assessment of potential impacts related to parks and recreational facilities can be found in Section 3.7, Recreation and Parks, of this EIR.

Comments related to public services received during the public comment period for the Notice of Preparation (NOP) included concerns about addressing current insufficient school capacities and the need for new or expanded schools, maintaining sufficient fire and police services and facilities with the addition of the project, and the lack of sufficient library facilities, where usage would increase with the addition of the project, in the Clairemont Mesa community. These concerns have been considered and addressed, as applicable, in the following evaluation of the project's potential to impact the City of San Diego's (City's) public services. The NOP and all comment letters received in response to the NOP are included in Appendix A of this EIR.

3.6.1 Existing Conditions

3.6.1.1 Fire Protection/Life Safety

In the City, the San Diego Fire-Rescue Department (SDFD) provides fire protection and emergency services to approximately 1,419,000 residents (City of San Diego 2019b). Specifically, the SDFD provides fire protection, emergency medical services (life/safety), and lifeguard protection at local beaches across their service area (City of San Diego 2019a). The SDFD employs a total of 1,300 personnel, including 892 fire personnel, 98 permanent uniformed lifeguard personnel, and 246 civilian personnel (City of San Diego 2019b). The SDFD has 52 fire stations and 9 permanent lifeguard stations with up to 31 seasonal lifeguard stations during peak periods. SDFD responded to a total of 159,590 emergency calls in fiscal year 2017, including 113,601 emergency medical responses (71.2 percent of responses), 12,577 urgent medical responses (7.9 percent), 11,385 hazard responses (7.1 percent), and 6,105 fire emergencies (3.8 percent) (City of San Diego 2019b).

The project site is served by Fire Station 36, located at 5855 Chateau Drive, approximately one mile east of the project site. Station 36 serves approximately 5.3 square miles in East Clairemont and its surrounding areas. Station 36 is equipped with a fire engine and paramedic unit. In 2018, Station 36 responded to a total of 2,889 emergency calls, including 1,995 medical emergencies (69 percent), 248 fire emergencies (8.6 percent), 182 hazard emergencies (6.3 percent), and 22 rescue emergencies (0.8 percent) (City of San Diego

2019c). The next closest fire station is Fire Station 37, located approximately 1.5 miles northwest of the project site at 5064 Clairemont Drive, which is equipped with a fire engine.

In addition to the fire protection and life safety services provided by the SDFD, emergency medical services are also provided throughout the City, including the project site, through a public/private partnership between the City's Emergency Medical Services (EMS) and the Rural Metro Corporation (ambulance service). EMS has ambulances, paramedics, and emergency medical technicians who respond to emergency calls. As stated above, Fire Station 36 houses a paramedic unit. All fire department engines and trucks are full Advanced Life Support units and are equipped and capable of managing medical emergencies.

The City's General Plan has a goal for fire protection and life safety first responders to arrive within 7.5 minutes to treat medical patients and control small fires 90 percent of the time. In 2018, the SDFD and EMS were able to meet the 7.5-minute response time standard 74 percent of the time (City of San Diego 2019a). In addition, to provide an effective response force for serious emergencies, a multiple-unit response of at least 17 personnel should arrive within 10.5 minutes from the time of 911-call receipt in fire dispatch 90 percent of the time (City of San Diego 2018a). In 2018, the SDFD and EMS were able to meet the 10.5-minute response time standard 82 percent of the time (City of San Diego 2019a).

3.6.1.2 Police Protection

The San Diego Police Department (SDPD) provides police services throughout the city, where services include patrol, traffic, investigative, records, laboratory, and support services. The SDPD is divided into nine divisions, and of April 2019, included 1,773 sworn police officers (City of San Diego 2019h). The project site is served by the Northern Division located at 4275 Eastgate Mall, approximately 4.8 miles north of the project site (City of San Diego 2019h). The Northern Division serves a 41.3 square mile area with a combined service population of 225,234 people. A total of 139 sworn officers are currently assigned to the Northern Division (City of San Diego 2019h).

The SDPD currently uses a five-level priority dispatch system, which includes in descending order of importance: priority E (Emergency), One, Two, Three, and Four. The calls are prioritized by the phone dispatcher and routed to the radio operator for dispatch to the field units. The priority system is designed as a guide, allowing the phone dispatcher and the radio dispatcher discretion to raise or lower the priority as necessary based on information received. In 2017, the SDPD responded to Priority E calls within 6.9 minutes, which was under the established target of 7.0 minutes; Priority 1 calls within 16.3 minutes, which was over the established target of 14.0 minutes; Priority 2 calls within 43.7 minutes,

which was over the established target of 27.0 minutes; Priority 3 calls within 102.6 minutes, which was over the established target of 80.0 minutes; and Priority 4 calls within 151 minutes, which was over the established target of 90.0 minutes (City of San Diego 2019e). The response times in 2016 for Beat 112, where the project is located within the Northern Division, in minutes were: Priority E calls within 8.1 minutes; Priority 1 calls within 20.6 minutes; Priority 2 calls within 50.3 minutes; Priority 3 calls within 91.1 minutes; and Priority 4 calls within 279.7 minutes (City of San Diego 2019h).

3.6.1.3 Schools

The project site is located within the San Diego Unified School District (SDUSD), which serves over 130,000 students ranging from preschool through grade 12 in 226 educational facilities with approximately 13,560 staff (City of San Diego 2018c). The project site is located within the SDUSD attendance boundaries of Holmes Elementary School, Marston Middle School, and Clairemont High School (SDUSD 2019). **Table 3.6-1** identifies the address, capacity, and enrollment at each of these schools. Other SDUSD schools located in the vicinity include Lafayette, Cadman, Sequoia and Field Elementary Schools, Montgomery and Innovation Middle Schools, Madison High School, Empower and Kavod Charter Schools, and roughly half a dozen other SDUSD facilities.

Table 3.6-1
SDUSD Schools Serving the Project Site

School	Address	Grades	Estimated Program Capacity*	2017-18 Enrollment	2018-19 Enrollment	2019-20 Projected Enrollment
Holmes Elementary	4902 Mount Ararat Dr.	K-5	At capacity	586	560	559
Marston Middle	3799 Clairemont Dr.	6-8	1,184	663	670	693
Clairemont High	4150 Ute Dr.	9-12	1,404	921	920	896

* According to SDUSD, capacities are approximate and calculated using current class size ratios; if class sizes ratios change, additional or less capacity may be available. Homes Elementary is currently operating at full capacity.

SOURCE: SDUSD 2019.

3.6.1.4 Libraries

Library facilities are provided throughout the city by the San Diego Public Library (SDPL) system. The SDPL system serves a population of over 1.3 million residents in the city over an area of 342 square miles (City of San Diego 2019f). The library system consists of the Central Library, 35 branch libraries, and an adult literacy program. The SDPL system receives more than 6 million visitors

per year and has more than 5.0 million items, including e-books and audio visual materials, 3,136 periodical subscriptions, 1.9 million government documents, and more than 250,000 books in 25 languages other than English (City of San Diego 2019f).

There are three SDPL branch libraries in the Clairemont Mesa community. These include: the 5,092 square foot Balboa Branch located on Mount Abernathy Avenue, approximately 1.0 mile east of the project site; the North Clairemont Branch located on Clairemont Drive, approximately 1.4 miles northwest of the project site; and the 4,437 square foot Clairemont Branch located on Burgener Boulevard, approximately 2.3 miles northwest of the project site. The Balboa, North Clairemont and Clairemont Branches have 33,400 volumes, 24,700 volumes, and 28,900 volumes, respectively (City of San Diego 2011).

According to the Clairemont Mesa Community Plan (CMCP), branch libraries are intended to serve about 30,000 residents and should have a maximum service area radius of two miles. In addition to the above standards, branch libraries should have an eventual capacity of 4.4 volumes per square foot of floor area. All three branch libraries currently meet these standards. The CMCP recommends that the Balboa and Clairemont Branches be expanded, based on an increase in the circulation of books from the community (City of San Diego 2011). In 2002, the City Council approved a program to build or improve 24 libraries throughout San Diego, including the Balboa branch, however funding for this project has not yet been identified (City of San Diego 2019k).

3.6.2 Regulatory Setting

3.6.2.1 Federal

There are no applicable federal regulations related to public services.

3.6.2.2 State

California Fire Code

The California Fire Code (Title 24, Part 9 of the California Code of Regulations) establishes regulations to safeguard life and property against hazards of fire, explosion, or dangerous conditions in new and existing buildings, structures, and premises. The Fire Code also establishes requirements intended to provide safety and assistance to firefighters and emergency responders during emergency operations. The provisions of the Fire Code apply to the construction, alteration, movement, enlargement, replacement, repair, equipment, use and occupancy, location, maintenance, removal, and demolition of every building or structure throughout the State of California. The Fire Code includes regulations regarding fire-resistance-rated construction, fire protection systems such as

alarm and sprinkler systems, fire services features, such as fire apparatus access roads, means of egress, fire safety during construction and demolition, and wildland-urban interface areas. Stairwells associated with parking structures are also required to include fire doors ("Opening Protectives") (California Fire Code Sections 7703.2, 909.5.2, 1022.2). The California Fire Code has been adopted by the City of San Diego in Municipal Code (SDMC), Chapter 5.

California Health and Safety Code

Additional fire regulations are set forth in Sections 13000 et seq. of the California Health and Safety Code, which include regulations for building standards (including high-rise buildings and childcare facilities), fire protection and notification systems, fire protection devices such as extinguishers and smoke alarms, and fire suppression training.

California Occupational Safety and Health Administration

In accordance with the California Code of Regulations, Title 8 Sections 1270 "Fire Prevention" and 6773 "Fire Protection and Fire Fighting Equipment," the California Division of Occupational Safety and Health Administration (Cal/OSHA) has established minimum standards for fire suppression and emergency medical services. The standards include, but are not limited to, guidelines on the handling of highly combustible materials, fire house sizing requirements, restrictions on the use of compressed air, access roads, and the testing, maintenance, and use of all firefighting and emergency medical equipment.

California State Assembly Bill 2926: School Facilities Act of 1986

In 1986, Assembly Bill (AB) 2926 was enacted to authorize the levy of statutory fees on new residential and commercial/industrial development to pay for school facilities. AB 2926 was expanded and revised in 1987 through the passage of AB 1600, which added Sections 66000 et seq. to the Government Code. Under this statute, payment of statutory fees by developers serves as California Environmental Quality Act (CEQA) mitigation to satisfy the impact of development on school facilities.

Senate Bill 50

The passage of Senate Bill (SB) 50 in 1998 defined the needs analysis process that is codified in Government Code Sections 65995.5 through 65998. Under the provisions of SB 50, school districts may collect fees to offset the costs associated with increasing school capacity as a result of development. Level I fees are assessed based upon the proposed square footage of residential, commercial/industrial, and/or parking structure uses. Level II fees require the developer to provide one-half of the costs of accommodating students in new

schools, and the state provides the other half. Level III fees require the developer to pay the full cost of accommodating the students in new schools and are implemented at the time the funds available from Proposition 1A (approved by the voters in 1998) are expended. School districts must demonstrate to the State that their long-term facilities needs and costs are based on long-term population growth in order to qualify for this source of funding.

The SDUSD levies the current State Allocation Board Level I fees. The SDUSD requires a developer fee per square foot of assessable space of new residential construction or additions of 500 square feet or more (SDUSD 2019).

Mitigation Fee Act

California Government Code Sections 66000-66025, also known as the Mitigation Fee Act, provides the requirements for development impact fee programs. A development impact fee is a monetary exaction other than a tax or special assessment that is charged by the City to an applicant in connection with approval of a development project for the purpose of defraying all or a portion of the cost of public facilities related to the development project.

3.6.2.3 Local

City of San Diego General Plan

The Public Facilities, Services, and Safety Element of the General Plan identifies a number of policies intended to ensure adequate public services are available to serve future development.

PF-D.1. Locate, staff, and equip fire stations to meet established response times as follows:

1. To treat medical patients and control small fires, the first-due unit should arrive within 7.5 minutes, 90 percent of the time from the receipt of the 911 call in fire dispatch. This equates to 1-minute dispatch time, 1.5-minute company turnout time, and 5-minute drive time in the most populated areas.
2. To provide an effective response force for serious emergencies, a multiple-unit response of at least 17 personnel should arrive within 10.5 minutes from the time of 911 call receipt in fire dispatch, 90 percent of the time.
    - This response is designed to confine fires near the room of origin, to stop wildland fires to under 3 acres when noticed promptly, and to treat up to 5 medical patients at once.

- This equates to 1-minute dispatch time, 1.5-minute company turnout time, and 8- minute drive time spacing for multiple units in the most populated areas.

PF-E.2. Maintain average response time goals as development and population growth occurs. Average response time guidelines include: Priority E Calls (imminent threat to life) within 7 minutes; Priority 1 Calls (serious crimes in progress) within 12 minutes; Priority 2 Calls (less serious crimes with no threat to life) within 30 minutes; Priority 3 Calls (minor crimes/requests that are not urgent) within 90 minutes; and Priority 4 Calls (minor requests for police service) within 90 minutes.

Clairemont Mesa Community Plan

The CMCP identifies three objectives for population-based parks including:

1. Ensure the use of school playgrounds and other recreational facilities for public use after school hours.
2. Continue to upgrade and modernize park and recreational facilities within the community.
3. Increase recreational opportunities in new residential and commercial development.

The CMCP provides the following recommendation for private recreational facilities:

Residential development projects should be required to provide on-site private recreational facilities in order to prevent overcrowded conditions of park facilities in the future.

- Residential development projects subject to discretionary permit review such as a Planned Residential Development permit, should include recreational facilities, such as lawns, recreation rooms, tennis courts and swimming pools.
- Private or public recreational facilities, such as tennis clubs and health spas and shower facilities should be included in commercial development projects, whenever possible.

City of San Diego Municipal Code

The SDMC contains the ordinances and regulations for the City, including provisions from the 2013 California Fire Code (SDMC Section 5-55.0101), General Rules for Land Development Review (SDMC Section 12), and Fire Permit Procedures (SDMC Section 12-129.0902).

3.6.3 Analysis of Project Effects and Determination as to Significance

For purposes of this EIR, the identified significance thresholds are based on criteria provided in the City of San Diego's CEQA Significance Determination Thresholds (City of San Diego 2016). Accordingly, a significant public services impact would occur if the project would:

> Issue 1: Have an effect upon, or result in a need for, new or altered governmental services to:
>
> 1. Fire protection/Life Safety
> 2. Police protection
> 3. Schools
> 4. Parks/Recreational Facilities
> 5. Libraries
> 6. Maintenance of public facilities, including roads.

The above governmental services would be considered to have an impact if there is a physical impact associated with the construction and operation of new or altered governmental facilities. Impacts are not related to changes in service times, response ratios, or performance objectives.

The below analysis only discusses the future development of the project site under the CPA and rezone of the project site. Site demolition and preparation activities (including the demolition of the existing buildings and related facilities) would not result in impacts to governmental services. As discussed in detail in Section 3.5, Population and Housing, this project component does not have the potential to result in permanent population growth, and, as such, does not have the potential to increase the need for governmental services to the extent that would require the construction of new facilities. Therefore, site demolition and preparation activities are not discussed further in this section.

Impacts related to the need for new or altered parks and recreational facilities are discussed in Section 3.7, Recreation and Parks, of this EIR.

3.6.3.1 Fire Protection/Life Safety

Issue 1a: Would the proposed project have an effect upon, or result in a need for new or altered governmental services to fire protection/life safety?

Impact Analysis

Community Plan Amendment and Rezone

Currently, the project site contains the former San Diego County Regional Crime Lab facility, which is non-operational and vacant and as such, generates minimal demand for fire protection and life safety services. The project includes an amendment to the Clairemont Community Plan and a rezone that would allow for a future development on the project site, including a maximum of 404 multifamily residential units. While the future development could propose a reduced number of units, for the purposes of CEQA the following analysis evaluates the worst-case scenario of full buildout allowed under the amendments to the Community Plan and rezone of the project site.

According to the American Community Survey from the San Diego Association of Governments (SANDAG), the community of Clairemont Mesa had an average multi-family person per household size of 2.05 people (City of San Diego 2019). Assuming an average household size of 2.05 people, maximum buildout of 404 units allowed by the project would have the potential to generate an additional 829 residents in the Clairemont Mesa community. These additional residents would create a net increase in demand for fire protection and life safety services from the SDFD Fire Stations 36 and ~~37~~ 27, which could result in potentially significant impacts to fire protection and life safety services.

However, while the project would allow for a future residential development that could generate up to an additional 829 residents in the community, implementation of the project would not result in a substantial increase in calls for fire protection and life safety service for several reasons. First, while the project would allow for the conversion of the site from commercial office uses to residential uses, the project site is currently served by SDFD and EMS as the site is contained within their service area. While the SDFD is currently not meeting the City's response time standards, the site is already being served by the SDFD and EMS, and project implementation would not expand the SDFD and EMS service area boundaries or increase the amount of urban land requiring fire protection and life safety services.

Additionally, the future applicant for the residential development would be required to pay the most current City development impact fees related to fire protection service and facilities prior to the issuance of a building permit. Payment of the development impact fees would be based off the total number of

units proposed for the future residential development and would ensure that the future residential project contributes its fair-share contribution to provide funding for the SDFD and associated facilities.

Lastly, the residential development would be required to be designed to comply with all applicable fire safety standards, including those contained in the California Building Code and Fire Code, which require features such as fire suppression sprinklers, fire alarms, onsite fire hydrants, and ensuring adequate emergency access. Compliance with to the latest Fire Code and Building Code fire safety standards would minimize the risk of fire hazards and emergency events at the project site.

Therefore, the proposed project would not result in substantial adverse physical impacts associated with the need for new or physically altered governmental facilities in order to maintain acceptable service ratios, response times, or other performance objectives for any fire protection or life safety service agencies. As such, the impacts would be less than significant.

3.6.3.2 Police Protection

Issue 1b: Would the proposed project have an effect upon, or result in a need for new or altered governmental services to police protection?

Impact Analysis

Community Plan Amendment and Rezone

As stated above, the project site is served by SDPD's Northern Division located at 4275 Eastgate Mall, approximately 4.8 miles north of the project site (City of San Diego 2019h). Additional police protection services are provided by the Police Community Relations Office located at 4439 Olney Street, approximately 2.9 miles southwest of the project site.

Similar to the analysis provided above for Issue 1a, the future residential development allowed by the project has the potential to generate up to an additional 829 residents in the Clairemont Mesa community, which would increase demand on the SDPD. However, the project site is contained in the SDPD service area, where police protection services are already being provided to the site. Because the site is already being served by the SDPD, project implementation would not expand the service area boundaries or increase the amount of urban land requiring police protection services. Moreover, while the project would allow for a different type of land use on the project site, the change in land use and higher density of the residential development is not anticipated to substantially increase calls for police protection services to the extent that necessitate the construction of new police facilities.

In addition, the future applicant of the residential development would be required to pay the most current City development impact fees prior to issuance of a building permit. Payment of the development impact fees are to ensure that adequate funding is provided to SDPD to support the project. Furthermore, the residential development would include security features, such as onsite security and sufficient emergency access.

The SDPD would review future development plans as part of their Crime Prevention Through Environmental Design (CPTED) review process to identify potential crime and disorder threats and suggest related design changes prior to project construction. CPTED guidelines include the review and evaluation of common design elements such as streets and sidewalks, building façades and access, public facilities, parking areas, landscaping, fencing and gates, loading and unloading docks, and emergency access. Implementation of CPTED design features would also reduce the project's demands for police services.

Therefore, the proposed project would not result in substantial adverse physical impacts associated with the need for new or physically altered governmental facilities in order to maintain acceptable service ratios, response times, or other performance objectives for any police protection services. Impacts would be less than significant.

3.6.3.3 Schools

Issue 1c: Would the proposed project have an effect upon, or result in a need for new or altered governmental services to schools?

Impact Analysis

Community Plan Amendment and Rezone

The proposed project would allow for a future residential development with a maximum of 404 units on the project site, which would have the potential to generate new students and service demand from SDUSD. The future development would likely include 254 family affordable units and 150 senior residential units. The 150 senior residential units are excluded from this analysis, as school-age children would not be permitted to live in the units. If the number of senior residential units increases, the number of school age children would decrease.

The 150 senior units are excluded from this analysis, as school-age children would not be permitted to live in the units. Student generation rates vary based on the type of project, number of units, bedroom mix, neighborhood, perceived quality of assigned schools, and other factors. There are no district standard student generation rates – student generation rates for the proposed project were

based on SDUSD-identified student generation rates from similar residential developments in the vicinity of the proposed project (SDUSD 2019).

Estimated student increases for the proposed project are shown in **Table 3.6-2**. As indicated therein, the project would generate between 167 and 335 students requiring seats at SDUSD schools, including between 92 and 184 grade K-5 students, between 34 and 69 grades 6-9 students, and between 41 and 82 grades 9-12 students.

Table 3.6-2
Estimated Project Student Generation

School Level	Estimated Program Capacity*	2019-20 Projected Enrollment	Generation Rate (Student per Dwelling Unit)	Total Estimated Students Generated by Proposed Project (404 Dwelling Units)
K through 5	At capacity	559	0.363-0.726	92-184
6 through 8	1,184	693	0.135-0.271	34-69
9 through 12	1,404	896	0.161-0.321	41-82
Total	**--**	**--**	**0.659-1.318**	**167-335**

* According to SDUSD, capacities are approximate and calculated using current class size ratios; if class sizes ratios change, additional or less capacity may be available. Homes Elementary is currently operating at full capacity.

SOURCE: SDUSD 2019.

As shown in Table 3.6-2, there is more than adequate capacity at Marston Middle School and Clairemont High School to accommodate the grades 6 through 8 and grades 9 through 12 students that would be generated by the proposed project. Furthermore, while Table 3.6-1 indicates that Holmes Elementary is currently at capacity, SDUSD has indicated that the students that would be generated by the project can likely be accommodated by existing district facilities at all levels, although elementary school students may need to be redirected to a school other than Holmes Elementary, depending on enrollment and capacity status at the future time when the development is occupied by students (SDUSD 2019). According to SDUSD, other nearby elementary schools in the Clairemont Mesa community would likely have sufficient capacity to house the projected number of K through 5 students, should capacity at Holmes Elementary not be available.

Furthermore, the need for additional school facilities associated with new development is addressed through compliance with school impact fee assessment. SB 50 (Chapter 407 of Statutes of 1998) sets forth a state school facilities construction program that includes restrictions on a local jurisdiction's ability to condition a project on mitigation of a project's impacts on school facilities in excess of fees set forth in the Government Code. These fees are

collected at the time of issuance of building permits for commercial, industrial, and residential projects. Pursuant to Government Code Section 65995, the applicant would be required to pay developer fees directly to SDUSD prior to the issuance of a building permit for the future development. SDUSD would be responsible for any potential expansion or development of new facilities, which would undergo a separate environmental review when specific facilities are planned. Payment of these fees provides full and complete mitigation of school impacts associated with new development.

Therefore, the proposed project would not result in substantial adverse physical impacts associated with the need for new or physically altered governmental facilities in order to maintain acceptable service levels for area schools. As such, the impacts would be less than significant.

3.6.3.4 Libraries

Issue 1d: Would the proposed project have an effect upon, or result in a need for new or altered governmental services to libraries?

Impact Analysis

Community Plan Amendment and Rezone

As indicated previously, the project site is served by the SDPL system, which includes the Central Library and 35 branch libraries citywide. Three SDPL branch libraries are located within 2.3 miles of the project site, including the Balboa, North Clairemont, and Clairemont Branches. According to the CMCP, branch libraries are intended to serve about 30,000 residents and should have a maximum service area radius of 2 miles. Branch libraries should have an eventual capacity of 4.4 volumes per square foot of floor area. All three branch libraries in the Clairemont Mesa community currently meet these standards.

The future development allowed by the project has the potential to generate up to an additional 829 residents in the Clairemont Mesa community, which would increase the demand for library services from the SDPL system, especially at the three closest SDPL libraries and at the SDPL Central Library. The future applicant for the residential development would be required to pay the most current City development impact fees related to library facilities prior to issuance of a building permit. Payment of the development impact fees are to ensure that adequate funding is provided to ensure library facilities are provided in the community with the addition of the project. Therefore, with payment of the applicable development impact fees, the project would not significantly impact the SDPL system, especially the library branches located in the Clairemont Mesa community.

In addition, the need to expand a library is based on an increase in the circulation of books from the community. The CMCP recommends that the Balboa and Clairemont Branches be expanded (City of San Diego 2011). In 2002, the City Council approved a program to build or improve 24 libraries throughout San Diego, including the Balboa branch, however funding for this project has not yet been identified (City of San Diego 2019k). The City is responsible for either expanding existing library facilities or planning and constructing new library facilities, which would be required to undergo a separate environmental review when specific facilities are planned. On a project-by-project basis, payment of the development impact fees provides full and complete mitigation of library impacts associated with new development.

Therefore, the proposed project would not result in substantial adverse physical impacts associated with the need for new or physically altered governmental facilities in order to maintain acceptable service levels for area libraries. As such, the impacts would be less than significant.

3.6.3.5 Maintenance of Public Facilities

Issue 1e: Would the proposed project have an effect upon, or result in a need for new or altered governmental services related to maintenance of public facilities, including roads?

Impact Analysis

Community Plan Amendment and Rezone

The design of any future road improvements would be reviewed and approved by the City prior to issuance of a building permit, and the future applicant would be required to pay all applicable fees to the City for maintenance and improvement of public facilities, including roads (City of San Diego 2019j). No other public facility needs or deficiencies have been identified as a result of the project. Therefore, the proposed project would not result in substantial adverse physical impacts associated with the need for new or physically altered governmental facilities related to maintenance of public facilities, including roads. As such, impacts related to the maintenance of public facilities would be less than significant.

3.6.4 Cumulative Impact Analysis

The geographic context for the analysis of cumulative impacts related to public services is the city of San Diego. Implementation of the proposed project in combination with cumulative development in the city could result in an increased demand for public services. However, the City has established a fee structure for all future and cumulative projects to ensure that the City can continue to provide public services and can strive to maintain established service ratios, response

times, and other performance objectives for fire and police protection, schools, and other public facilities with future population growth envisioned under the General Plan. These fees allow the City to have a source of funding available to provide new or additional facilities necessary to achieve and maintain adequate public service provisions as development occurs within an area. Therefore, the project's contribution to cumulative impacts associated with fire protection, police protection, parks and recreational facilities, libraries, and school would be less than significant.

3.6.5 Significance of Impacts Prior to Mitigation

Impacts related to public services would be less than significant.

3.6.6 Mitigation

No mitigation measures are required.

3.6.7 Conclusion

The proposed project would comply with the City's development impact fee structure related to public services, which would mitigate the project's impacts on existing fire protection, life safety, and police services, libraries, schools, and other public facilities. Payment of all applicable fees would ensure that impacts to public services would be less than significant.

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3.7 Recreation and Parks

This section provides an assessment of potential impacts related to recreation and parks and recreational facilities that could result from project implementation. Potential impacts addressed in this section include increased use of existing recreational facilities and the need for the expansion of existing or the construction of new recreational facilities that may be necessary as a result of implementation of the proposed project.

Comments related to recreation and recreational facilities received during the public comment period for the Notice of Preparation (NOP) included concerns regarding ensuring adequate park acreage to accommodate the increase in population and addressing the lack of amenities in the Clairemont Mesa community within the city of San Diego. These concerns have been considered and addressed, as applicable, in the following evaluation of the project's potential to impact recreational facilities. The NOP and all comment letters received in response to the NOP are included in Appendix A of this EIR.

3.7.1 Existing Conditions

The project site is owned by the County of San Diego (County) but is located entirely in the city of San Diego. The project site is currently developed with the former San Diego County Regional Crime Lab facility and associated parking and landscaping. There are no onsite recreational amenities. Recreational facilities in the vicinity of the project site are owned and operated by the city, as described in greater detail below.

3.7.1.1 Existing Parks and Recreational Facilities

The City has over 42,000 acres of park and open space lands that offer a diverse range of recreation opportunities. The community is served by 22 recreational amenities, which include 6 community parks, 7 neighborhood parks, 5 joint use parks at school sites, 3 recreation centers and 1 aquatic complex or swimming pool (City of San Diego 2019). **Table 3.7-1** lists the parks in the Clairemont Mesa community and provides the approximate distance from the project site.

The total acreage of these 22 recreational facilities is approximately 129 acres. The Play All Day Parks Program is a new initiative (2016) between the City and San Diego Unified School District to expand the existing joint-use park program by adding over 45 new joint-use parks throughout the city, including schools located in the Clairemont Mesa community. In the Clairemont Mesa community, a Play All Day joint use park at the Creative Performing and Media Arts Middle school has already been built and is open to the public and an additional 10 new Play All Day joint-use fields are planned (City of San Diego 2019).

Table 3.7-1
Parks and Recreational Facilities in the Clairemont Mesa Community

Park	Location	Size (acres)	Distance from Project site (miles)
Non Population-Based Parks			
Regional Parks			
Marian Bear Memorial Park	5544 Regents Road	467	2.3
Tecolote Canyon Natural Park	5180 Tecolote Road	903	3.2
Mission Bay Park		4,235	2.2
Population-Based Parks			
Joint-Use Parks (Schools)			
Field Elementary Joint-Use	4375 Bannock Avenue	3.35	1.2
Marston Junior High Joint-Use	3799 Clairemont ~~Avenue~~ Drive	2.90	1.2
Cadman Elementary Joint-Use	4370 Kamloop Avenue	3.16	1.9
Alcott Elementary Joint-Use	4680 Hildalgo Avenue	6.11	2.3
Creative Performing and Media Arts Middle Joint-Use	5050 Conrad Avenue	8.0	1.0
Community Parks			
Olive Grove Community Park	6075 Printwood Way	9.18	0.75
North Clairemont Community Park	4421 Bannock Avenue	14.50	1.1
South Clairemont Community Park	3605 Clairemont Drive	9.7	1.4
Cadman Community Park	4280 Avati Drive	8.4	1.8
Hickman Field[1]		33.92	1.4
Tecolote Community Park[2]		1.26	3.2
Neighborhood			
Mount Etna Neighborhood Park	4741 Mount Etna Drive	3.23	0.45
Mount Acadia Neighborhood Park	3865 Mount Acadia Boulevard	5.61	0.60
East Clairemont Athletic Area and Park	3451 Mount Acadia Boulevard	6.99	1.2
Lindbergh Neighborhood Park	4141 Ashford Street	7.98	1.2
MacDowell Neighborhood Park	5183 Arvinels Way	2.31	1.5
Gershwin Neighborhood Park	3508 Conrad Avenue	4.10	1.9
Western Hills Neighborhood Park	4810 Kane Street	6.35	2.5
Total Parkland Acres for the City's Parkland Standard (Population-Based Parks)		**128.87**	

1 Hickman Field (46.51 acres total) is shared with the Clairemont Mesa community (33.92 acres), Serra Mesa community (9.16 acres) and Kearny Mesa community (3.43 acres)

2 Tecolote Community Park (19.67 acres total) is shared with the Clairemont Mesa community (1.26 acres) and Linda Vista community (18.41 acres)

SOURCE: City of San Diego 2011, City of San Diego 2019.

In addition to community, neighborhood, and joint-use parks, there are three regional parks located in the Clairemont Mesa community: Tecolote Canyon Natural Park, Marian Bear Memorial Park, and Mission Bay Park. Tecolote Canyon Natural Park and its associated Nature Center is located approximately three miles southwest of the project site, with a portion of the open-space canyon as close as 500 feet west of the project site. Tecolote Canyon Natural Park consists of approximately 903 acres that bisect the community (City of San Diego 2011). The park has approximately 6.5 miles of trails for jogging, walking and mountain biking and the Tecolote Nature Center with exhibits on animal and plant life of the canyon. Marian Bear Memorial Park is located approximately 1.9 miles north of the project site and consists of approximately 467 acres that spans the northern community boundary from Interstate 5 (I-5) to Interstate 805 (I-805). The park contains a number of trails that are accessible from public roads and the community. Mission Bay Park is located approximately 2.2 miles southwest of the project site and consists of over 4,235 acres in roughly equal parts land and water. Mission Bay Park includes 27 miles of shoreline, offers boat docks and launching facilities, biking and walking paths, basketball courts, and playgrounds.

As shown in Table 3.7-1, the nearest public recreational facility to the project site is Mount Etna Neighborhood Park, which is located approximately 0.45 miles northwest of the project site. This park includes picnic benches, green space, a playground, and three baseball fields. Additionally, Mount Acadia Neighborhood Park is located approximately 0.6 miles south of the project site. This park includes restrooms, green space, picnic benches, a playground, and two baseball fields. In addition, Olive Grove Park is located approximately 0.75 miles northeast of the project site (City of San Diego 2011; City of San Diego 2019).

The City's General Plan guidelines recommend a public park of 2.8 acres for every 1,000 residents, a recreation center for every 25,000 residents, and a community swimming pool for every 50,000 residents (City of San Diego 2008). As of 2017, the Clairemont Mesa community had a reported household population of 80,337 residents, which would require approximately 225 acres of parkland, 3 recreation centers, and 2 swimming pools to meet the City's standard (SANDAG 2017). The community is currently served by 3 recreation centers, meeting this City standard; however, there is currently one swimming pool serving the community, creating a deficiency by one swimming pool. Based on the acreages of the qualifying parks provided in Table 3.7-1, the City is currently providing approximately 129 acres of parkland within the Clairemont Mesa community, which does not satisfy the City's parkland standard, as there is a deficit of approximately 96 acres of parkland in the community.

3.7.2 Regulatory Setting

3.7.2.1 Federal

There are no applicable federal regulations related to recreation.

3.7.2.2 State

Mitigation Fee Act

California Government Code Sections 66000-66025, also known as the Mitigation Fee Act, provides the requirements for development impact fee programs. A development impact fee is a monetary exaction other than a tax or special assessment that is charged by the City to an applicant in connection with approval of a development project for the purpose of defraying all or a portion of the cost of public facilities related to the development project.

3.7.2.3 Local

City of San Diego General Plan

The City's General Plan provides the long-range planning vision for the city and the Recreation Element provides goals and policies specific to the City's existing and planned recreational resources. The goals and policies of the Recreation Element have been developed to take advantage of the City's natural environment and resources, to build upon existing recreational facilities and services, to help achieve an equitable balance of recreational resources, and to adapt to future recreation needs of residents. The Recreation Element goals and policies applicable to the project include the following:

> RE-A.8. Provide population-based parks at a minimum ratio of 2.8 useable acres per 1,000 residents.
>
> a. All park types within the Population-based Park Category could satisfy population-based park requirements.
>
> b. The allowable amount of useable acres exceeding two percent grade at any given park site would be determined on a case-by-case basis by the City.
>
> c. Include military family housing populations when calculating population-based park requirements.
>
> d. Ensure that parks are located adjacent to a public right-of-way
>
> e. All parks to be designed and constructed consistent with the "Consultant's Guide to Park Design & Development."

RE-A.15. Ensure that adequate funding is identified in public facilities financing plans for the acquisition and development of sufficient land necessary to achieve a minimum ratio of 2.8 useable acres per 1,000 residents or appropriate equivalencies, including any unmet existing/future needs.

RE-A.17. Ensure that all development impact fees and assessments collected for the acquisition and development of population-based parks and recreation facilities be used for appropriate purposes in a timely manner.

Clairemont Mesa Community Plan

The Clairemont Mesa Community Plan (CMCP) provides polices and information specific to the community planning area of Clairemont Mesa within the city. Specific to population-based parks and recreation, the CMCP establishes a goal to provide a system of parks and recreational facilities to meet the recreational needs of the entire community in conformance with the Progress Guide and General Plan standards. Recommendations to achieve this goal, include maintenance, development of a long-term refurbishment program for park facilities, joint use agreements with San Diego Unified School District, as well as the development of turfed multi-purpose ball fields on school sites.

3.7.3 Analysis of Project Effects and Determination as to Significance

For purposes of this EIR, the identified significance thresholds are based on criteria provided in Appendix G of the California Environmental Quality Act (CEQA) Guidelines. Accordingly, a significant recreation impact would occur if the project would:

Issue 1: Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated;

Issue 2: Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment; or

Issue 3: Have an effect upon, or result in a need for, new or altered governmental services to parks and recreational facilities.

3.7.3.1 Deterioration of Existing Recreational Facilities

Issue 1: Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Issue 3: Would the project have an effect upon, or result in a need for, new or altered governmental services to parks and recreational facilities?

Impact Analysis

Community Plan Amendment and Rezone

As stated above, the Recreation Element of the City's General Plan establishes a parkland standard of 2.8 acres for every 1,000 residents, a recreation center for every 25,000 residents, and a community swimming pool for every 50,000 residents (City of San Diego 2008). As of 2017, the population in Clairemont Mesa was 80,337 residents, which would require approximately 225 acres of parkland, 3 recreational centers, and two pools to meet the City's standard. As detailed above, the community is currently served by 3 recreation centers, meeting this City standard; however, there is currently one swimming pool serving the community, creating a deficiency by one swimming pool. Based on the acreages of the qualifying parks provided in Table 3.7-1, there are approximately 129 acres of parks located within the Clairemont Mesa community, which is approximately 96 acres below the City's goal of providing 2.8 acres of parkland per 1,000 residents. Thus, the City is currently not meeting its parkland or recreation standard in the Clairemont Mesa community.

The project includes an amendment to the CMCP and a rezone the project site that would allow for a future development on the project site, which would allow for a change in the type of use on the project site (and the rezone and additional units would be incorporated into the current Community Plan Update analysis). The amendment to the CMCP and rezone of the project site would allow for a future development with a maximum of 404 units. While the future proposed development could propose less units, for the purposes of CEQA, the following analysis evaluates the worst-case scenario of full buildout allowed under the amendments to the CMCP and rezone.

According to the San Diego Association of Governments (SANDAG) American Community Survey, the community of Clairemont Mesa had an average number of multi-family persons per household size of 2.05 people in 2017 (City of San Diego 2019). Assuming an average household size of 2.05 people, the maximum buildout of 404 units allowed by the project would have the potential to generate an additional 829 people in the Clairemont Mesa community, as discussed in Section 3.5, Population and Housing, of this EIR. The addition of these 829

residents would result in an increase in the demand on existing recreational amenities within the community, which could result in a potentially significant impact to existing recreational facilities and parks.

With all residential development, the City requires developers to satisfy one of the following three options in order to accommodate recreational needs generated by future development within the city: (1) pay the City's established parks development impact fee; (2) pay a portion of the parks development impact fee and provide dedicated parkland; or (3) provide dedicated parkland and pay the recreation center and aquatic complex portion of the development impact fee. Because the project has the potential to generate an additional 829 residents with development of the future residential building, the future developer would be required to either provide approximately 2.32 acres of parkland to accommodate the new residents or pay the applicable recreation and parks development impact fees to the City prior to issuance of a building permit. The actual amount the future developer would have to pay for the park development impact fee depends on the number of units proposed in the future residential development.

Because the future developer would be providing for the development of additional parklands, either through the payment of development impact fees or by directly constructing or providing the parkland, the increased use of existing parks and recreational facilities would not result in substantial physical deterioration of the existing facilities. Therefore, impacts to existing recreational facilities and parks would be less than significant.

Site Demolition and Preparation

In addition to the amendment to the Community Plan and rezone, the proposed project also includes the demolition of the existing unoccupied buildings and related facilities on-site, disposal of the demolition debris, mass grading of the site, and existing utilities stubbed out to the project site boundary. Because this component of the project does not include the construction of new residential housing which in turn would induce population growth, this project component has no potential to impact existing recreational facilities or parks. For this reason, no impacts to existing recreational facilities and parks would occur from site demolition and preparation.

3.7.3.2 Expansion or Creation of New Recreational Facilities

Issue 2: Would the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Impact Analysis

Community Plan Amendment and Rezone

As stated above, the project has the potential to generate approximately 829 new residents within the Clairemont Mesa community, which in turn would increase demand on existing parks and recreational facilities in the area. However, the future developer would be required to either (1) pay the City's established parks development impact fee; (2) pay a portion of the parks development impact fee and provide dedicated parkland; or (3) provide dedicated parkland. Through the payment of the parks development impact fee and/or providing new dedicated parkland, the future developer would satisfy the City's requirement to contribute the project's fair share to offset project impacts to the City's existing parks and recreational facilities. Furthermore, even though the City is not currently achieving its parkland standard, it is the City's responsibility to use the parks development impact fees provided from residential development to create new recreational facilities and/or parks. As such, payment of the City's park development impact fees would ensure that the future developer contributes its fair share to the City's park fund, and impacts would be considered less than significant.

Site Demolition and Preparation

In addition to the amendments to the CMCP and rezone of the project site, the proposed project also includes the demolition of the existing unoccupied buildings and related facilities on-site, disposal of the demolition debris, mass grading of the site, and existing utilities stubbed out to the project site boundary. Because this component of the project does not include the construction or expansion of recreational facilities, no impact to recreation or recreational facilities would occur.

3.7.4 Cumulative Impact Analysis

The geographic context for the analysis of cumulative impacts related to recreational facilities is the community of Clairemont Mesa. The proposed project would allow for the future development of a residential building with a maximum of 404 units, which could generate up to 829 new residents in Clairemont Mesa. Similar to the project, other cumulative development project has the potential to generate population growth. As shown in Table 1-2, there are two cumulative

development projects, Jefferson Pacific Beach and The Summit at MB – EOT, which would construct a total of 348 new residential units. Using an average household size of 2.05 persons per household, these projects would increase the population by approximately 713 residents, or 1,541 residents including the proposed project. The proposed project, in combination with population increases resulting from other cumulative projects in the community, would result in increased demand on park facilities. To meet this demand, new and expanded parks and recreational facilities would be funded by new development within the community via the payment of development impact fees on a project-specific basis. The provision of additional parkland to serve the community could result in a physical impact on the environment which could be significant. However, there are no specific plans for additional parks at this time. The construction of new park facilities would be subject to separate environmental review at the time design plans are available. In addition, cumulative projects would be reviewed by the City during the building permit process to determine acceptable parkland standards. Therefore, with the payment of development impact fees, the proposed project, in combination with other approved and planned developments within the project vicinity, would not result in significant cumulative impacts on parks and recreational facilities.

3.7.5 Significance of Impacts Prior to Mitigation

Impacts related to recreation and recreation facilities would be less than significant.

3.7.6 Mitigation

No mitigation measures are required.

3.7.7 Conclusion

Because the proposed project has the potential to add approximately 829 new residents to the project area, the project would increase demand on existing recreational facilities and parks. However, the future developer of the residential building would be required to either provide approximately 2.32 acres of parkland to accommodate the new residents or pay the applicable recreation and parks development impact fees to the City prior to issuance of a building permit in order to offset project impacts to existing recreational facilities and parks. Furthermore, the project itself does not include new public recreational facilities and would not cause the need for the expansion or creation of recreational facilities. Therefore, impacts to recreational facilities and parks would be less than significant.

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3.8 Utilities and Service Systems

This section discusses potential impacts to utilities and service systems, including water supply, wastewater treatment, and solid waste disposal resulting from implementation of the proposed project.

Comments related to utilities and service systems received during the public comment period for the Notice of Preparation (NOP) included concerns about water supply and infrastructure upgrades. These concerns have been considered and addressed, as applicable, in the following evaluation of the project's potential to impact utilities and service systems. The NOP and all comment letters received in response to the NOP are included in Appendix A of this EIR.

3.8.1 Existing Conditions

The project site is located in the community of Clairemont Mesa in the city of San Diego (city). The project site is currently occupied by the vacant former San Diego County Crime Lab facility. While utilities infrastructure currently serves the project site, to be conservative, this section does not take into account the historic utilities use at the site, but instead assumes there is no current utilities use at the project site due to its vacant status.

3.8.1.1 Water Supply and Demand

The proposed project is located within the Miramar service area of the City's Public Utilities Department (PUD) water system (City of San Diego 2016). The PUD stores, treats, and delivers potable water for approximately 1.3 million residents. The water system spans three major water treatment service areas, with three water treatment plants, nine reservoirs, two water reclamation plants, more than 3,000 miles of water transmission and distribution pipelines, and 50 water pump stations (City of San Diego 2016).

The City's PUD relies heavily on imported water as its major water supply and purchases up to 90 percent of its water from the San Diego County Water Authority (SDCWA), which in turn purchases most of its water from the Metropolitan Water District of California (MWD). MWD imports its water from two main supply sources, including the Colorado River Aqueduct (which MWD owns and operates) and the State Water Project (which brings water from the Bay-Delta).

The City's water system is divided into three major service areas: Miramar, which serves the northern portion of the city including the project site; Alvarado, which serves Mission Bay and Mission Valley; and Otay, which serves the southern portion of the city. The Miramar Water Treatment Plant (WTP) is located in Scripps Miramar Ranch and provides drinking water to an estimated 500,000 customers in the northern section of the city, including the project site. The City is

completing an expansion and upgrade of the plant to ensure future customer demand and stringent drinking water standards are met. The Miramar WTP's capacity is 144 million gallons per day (mgd) of treated drinking water and is expected to increase to 215 mgd in 2020 (City of San Diego 2016; City of San Diego 2017).

In addition to imported water, the City has taken multiple actions in recent years to expand its recycled water system. Recycled water contributed to an average of 4 percent of the City's supply portfolio in 2015 (City of San Diego 2016). Recycled water helps reduce demands for potable water by substituting imported potable supplies with non-potable supplies. The City's northern service area provides recycled water distribution to the northern portion of the city. The northern service area receives source water from the North City Water Reclamation Plant (NCWRP). Recycled water does not currently serve the project site (City of San Diego 2011).

The City's existing and planned water supply and demand from 2010 through 2040 was obtained from the City's Urban Water Management Plan, and is shown in **Tables 3.8-1** and **3.8-2**. As shown in Tables 3.8-1 and 3.8-2, the City anticipates have adequate water supplies to meet the future water demand within its service areas.

Table 3.8-1
City of San Diego Existing and Future Water Supply

	Water Supply (AFY)			
Water Supply Source (Existing and Planned)	**2015**	**2020**	**2030**	**2040**
Surface Water	6,279*	22,900	22,700	22,500
Groundwater	500	3,100	3,100	3,100
Recycled Water (non-potable)	8,195	13,650	13,650	13,650
Total Verifiable Local Water Supplies	14,974	39,650	39,450	39,250
SDCWA Water Purchases with Verifiable Regional Water Supplies	173,754	161,334	225,390	234,158
Total Verifiable Water Supplies	**198,957**	**200,984**	**264,840**	**273,408**

* 2015 represents actual supplies under very dry hydrologic conditions, resulting in very low surface water supplies.

SOURCE: City of San Diego 2016

Table 3.8-2
City of San Diego Historical and Projected Water Demand

Use	Demand (AFY)			
	2015	2020	2030	2040
Retail Potable Water	167,112	168,340	223,962	230,980
Wholesale Potable Water	10,229	12,200	15,453	15,821
Non-Revenue Water	13,421	15,700	18,020	18,576
Potable Subtotal	190,762	196,240	257,435	265,377
Recycled Water (non-potable)	8,195	13,650	13,650	13,650
Total Demand	**198,957**	**209,890**	**271,085**	**279,027**
Total Demand with Active Water Conservation Methods	**198,957**	**200,984**	**264,840**	**273,408**

Source: City of San Diego 2016

3.8.1.2 Wastewater

The City's PUD provides wastewater collection, treatment, and disposal services to the San Diego region, including the project site (City of San Diego 2016). The City collects and treats approximately 160 mgd of wastewater that is generated within its boundaries as well as 12 other agencies that form the Metro Wastewater Joint Powers Authority. Collectively, the wastewater system is known as the Metro System. Facilities in the system include the Point Loma WTP, NCWRP, and South Bay Water Reclamation Plant (WRP), which together collected 190,313 acre-feet of wastewater in 2015 (City of San Diego 2016).

The NCWRP treats wastewater generated by northern San Diego communities, including the project site, and has a total treatment capacity of 30 mgd. In 2015, the NCWRP collected an average daily wastewater inflow of 16 mgd and treated 15 mgd to a secondary treatment level (City of San Diego 2016).

3.8.1.3 Solid Waste

The City of San Diego Environmental Services Department operates the solid waste collection and disposal services to residents throughout the city, including the project site (City of San Diego 2019). Solid waste is collected by one of 21 City-franchised haulers and transported to the Miramar Landfill for disposal. The Miramar Landfill is located at 5180 Convoy Street, approximately two miles northeast of the project site. The Miramar Landfill is the only city–operated active landfill and spans over 1,500 acres. The landfill permits a maximum of 8,000 tons per day, and over 910,000 tons of trash is disposed at this landfill per year (CalRecycle 2019a, City of San Diego 2019). With the addition of the City's Zero

Waste Plan and improved trash compaction methods, the Miramar Landfill's remaining capacity is approximately 11,612,073 tons, and will reach capacity by 2030 (City of San Diego 2015a). The City's waste reduction and recycling programs, aided by innovative engineering, have helped extend the landfill's working life. All cities in California are required to reduce, reuse, or recycle half of their trash. In 2004, the City of San Diego met this requirement with a 52 percent diversion rate, and is currently at a 66 percent diversion rate (City of San Diego 2019).

3.8.2 Regulatory Setting

3.8.2.1 Federal

There are no applicable federal regulations related to utilities and service systems.

3.8.2.2 State

California Administrative Code

The California Administrative Code (CSC) establishes efficiency standards for reducing water usage in new water fixtures. Title 24 CAC, Section 25352, addresses pipe insulation requirements, which reduce the amount of hot water used before reaching equipment and fixtures. Title 20 CAC Section 1604, provides efficiency standards for water fixtures, including lavatory faucets, showerheads, and sink faucets.

California Urban Water Management Planning Act

Adopted in 1983, Section 10610 of the California Water Code established the California Water Management Planning Act (CUWMPA), which requires urban water suppliers to initiate planning strategies to ensure an appropriate level of reliability in its water service. CUWMPA states that every urban water supplier that provides water to 3,000 or more customers, or that annually provides more than 3,000 acre-feet of water service, should make every effort to ensure the appropriate level of reliability in its water service to meet the needs of its various categories of customers during normal, dry, and multi-dry years. The CUWMPA describes the contents of Urban Water Management Plans as well as methods for urban water suppliers to adopt and implement the plans. The City of San Diego adopted its 2015 Urban Water Management Plan in June 2016.

California Senate Bill 7

Senate Bill (SB) 7 (X7-7) was enacted in November 2009 to require all water suppliers to increase water use efficiency. The legislation (California Water Code Section 10608.20) sets an overall goal of reducing per capita urban water use by 20 percent by December 31, 2020. In order to reach this goal, SB X7-7 requires

each urban retail water supplier to report progress in meeting water use targets. The bill also requires wholesale water suppliers to support their retail member agencies efforts to comply with SB X7-7 through a combination of regionally and locally administered active and passive water conservation measures, programs, and policies, as well as the use of recycled water.

California Integrated Waste Management Act of 1989 (Assembly Bill 939)

The California Integrated Waste Management Act of 1989 (AB 939) redefined solid waste management in terms of both objectives and planning responsibilities for local jurisdictions and the state. AB 939 was adopted in an effort to reduce the volume and toxicity of solid waste that is landfilled and incinerated by requiring local governments to prepare and implement plans to improve the management of waste resources. AB 939 required each of the cities and unincorporated portions of the counties throughout California to divert a minimum of 25 percent of the solid waste sent to landfills by 1995 and 50 percent by the year 2000. To attain goals for reductions in disposal, AB 939 established a planning hierarchy using new integrated solid waste management practices. These practices include source reduction, recycling and composting, and environmentally safe landfill disposal and transformation.

California Solid Waste Reuse and Recycling Act of 1991 (Assembly Bill 1327)

The California Solid Waste Reuse and Recycling Act of 1991 (AB 1327) requires adequate areas for collecting and loading recyclable materials within a project site. AB 1327 requires local governments to adopt an ordinance for the transfer, receipt, storage, and loading of recyclable materials in development projects.

California Assembly Bill 341

On October 6, 2011, Assembly Bill (AB) 341 was signed, which establishes a state policy of no less than 75 percent of solid waste generated by source reduced, recycled, or composted by 2020, and required CalRecycle to provide a report to the Legislature that recommends strategies to achieve the policy goal by January 1, 2014. The bill also mandated local jurisdictions to implement commercial recycling by July 1, 2012. The City of San Diego is currently at a 66 percent diversion rate.

California Senate Bill 610

California SB 610 went into effect January 2002 with the intention of linking water supply availability to land use decisions made by cities and counties. SB 610 requires water suppliers to prepare a water supply assessment report for inclusion by land use agencies within the CEQA process for new developments. As defined in SB 610, large-scale projects include residential development projects of more than 500 residential units and/or shopping centers or

businesses employing more than 1,000 people or having more than 500,000 square feet (SF) of floor space.

3.8.2.3 Local

County of San Diego Construction and Demolition Debris Deposit Ordinance

The County Board of Supervisor's requires all County construction and demolition projects comply with the Construction and Demolition Recycling Ordinance (Sections 68.508 through 65.518 to the County Code of Regulatory Ordinances), otherwise known as the Construction and Demolition Ordinance. This program is intended to increase diversion of construction and demolition materials from landfills, conserve landfill capacity, extend the useful life of local landfills and avoid potential consequences to the County if it fails to comply with State waste diversion requirements. The ordinance requires contractors to submit a Construction and Demolition Debris Management Plan, where the contractor shall divert 90 percent of inert materials and 70 percent of all other materials of the project. In order to comply with the ordinance, applicants must submit a Construction and Demolition Debris Management Plan to identify the types and quantities of materials that will be generated by the project and show how materials will be diverted away from landfill disposal using recycling, reduction, and onsite reuse. This ordinance would apply to the proposed project's demolition and site preparation phase of the project, as this phase would occur under the jurisdiction of the County. Construction and operation of the future development would occur under the City's jurisdiction, and would comply with the City's ordinances, as detailed further below.

City of San Diego General Plan

The Public Facilities, Services, and Safety Element of the City of San Diego General Plan addresses facilities and services that are publicly managed and have a direct influence on the location of land uses, including wastewater and water infrastructure. The following policies are relevant to the proposed project:

Policy PF-H.2: Provide and maintain essential water storage, treatment, supply facilities and infrastructure to serve existing and future development.

Policy PF-I.1: Provide efficient and effective waste collection services.

d. Provide space for recycling containers and efficient collection.

Policy PF-1.2: Maximize waste reduction and diversion.

a. Conveniently located facilities and informational guidelines to encourage waste reduction, diversion, and recycling practices.

b. Operate public and private facilities that collect and transport waste and recyclable materials in accordance with the highest environmental standards.

f. Reduce and recycle Construction and Demolition debris. Strive for recycling of 100 percent if inert Construction and Demolition materials and a minimum of 50 percent by weight of all other material.

Clairemont Mesa Community Plan

The Clairemont Mesa Community Plan (CMCP) provides policies and information specific to the community planning area of Clairemont Mesa within the city. The CMCP states that water mains and sewer lines are considered generally adequate throughout the community. The replacement of water mains and sewer lines have been occasionally needed due to aging infrastructure. According to the CMCP, the City of San Diego has a sewer and water main replacement program that is funded on an annual basis. The following CMCP policies related to utilities and service systems are relevant to the proposed project.

> Primary Goal for Community Facilities: Establish and maintain a high level of public facilities and services to meet the needs of the community.
>
> Objective 3: Maintain water and sewer facilities to adequately serve the community.

City of San Diego Zero Waste Plan

The City's Zero Waste Plan was approved and adopted by City Council on July 13, 2015. The Zero Waste Plan lays out strategies to divert 75 percent of all trash by 2020, 90 percent diversion by 2035, and an ultimate goal of zero waste by 2040. The City of San Diego is currently at a 66 percent diversion rate.

City of San Diego Recycling Ordinance

The City's Recycling Ordinance requires on-site recyclable collection for all single-family residences; City-serviced multi-family residences; and privately-serviced businesses, commercial/institutional facilities, apartments, condominiums, and special events requiring a City permit. The ordinance requires recycling of plastic and glass bottles and jars, paper, newspaper, metal containers and cardboard. City-serviced residences and privately-serviced commercial and institutional properties must also recycle rigid plastics including clean food waste containers, jugs, tubs, trays, pots, buckets, and toys. To monitor compliance with the ordinance, annual reports must be submitted to the City's Environmental Services Division from those providing recyclable material collection services.

City of San Diego Refuse and Recyclable Materials Storage Regulations

The City's Refuse and Recyclable Materials Storage Regulations indicate the minimum exterior refuse and recyclable material storage areas required at residential and commercial properties. These are intended to provide permanent, adequate, and convenient space for the storage and collection of refuse and recyclable materials; encourage recycling of solid waste to reduce the amount of waste material entering landfills; and meet the recycling goals established by the City Council and mandated by the State of California. The regulations provide minimum requirements for the size and location of material storage areas.

City of San Diego Ordinance 0-17327 (Mandatory Reuse Ordinance)

This ordinance, adopted by the City Council in 1989, requires that "recycled water shall be used within the City where feasible and consistent with the legal requirements, preservation of public health, safety, and welfare, and the environment." Compliance with this ordinance for new development is made a condition of tentative maps, land use permits, etc., based on the project's location within an existing or proposed recycled water service area.

City of San Diego Construction and Demolition Debris Deposit Ordinance

San Diego Municipal Code (SDMC) Section 66.0701 et seq., the 2008 Construction and Demolition (C&D) Debris Deposit Ordinance, requires that the majority of construction, demolition and remodeling projects pay a refundable C&D Debris Recycling Deposit and divert their debris by recycling, reusing or donating usable materials. The ordinance is designed to keep C&D materials out of local landfills. The Ordinance requires project applicants to submit a Waste Management Form with the building permit or demolition/removal permit, to provide a general estimate of the total waste generated by the project including how much will be recycled. The code requires a minimum diversion rate of 50 percent for building permits or demolition/removal permits issued within 180 calendar days of the effective date of the ordinance, and a minimum diversion rate of 75 percent for building permits or demolition/removal permits issued after 180 calendar days from the effective date of the ordinance, provided that a certified recycling facility which accepts mixed construction and demolition debris is operating within 25 miles of the City Administrative Building.

3.8.3 Analysis of Project Effects and Determination as to Significance

For purposes of this EIR, the identified significance thresholds are based on criteria provided in the City of San Diego's CEQA Significance Determination Thresholds (City of San Diego 2016). Accordingly, a significant utilities and service systems impact would occur if the project would:

Issue 1: Result in a need for new systems, or require substantial alterations to existing utilities, the construction of which would create physical impacts (natural gas, water, sewer, communications systems, solid waste disposal);

Issue 2: Result in the use of excessive amounts of fuel or energy (e.g. natural gas);

Issue 3: Result in the use of excessive amounts of power;

Issue 4: Use of excessive amounts of water;

Issue 5: Landscaping which is predominantly non-drought resistant vegetation;

Issue 6: Would the proposed project have an effect upon, or result in a need for new or altered solid waste facilities.

For a discussion on Issue 2 and 3, refer to Section 3.2, Energy, of this EIR.

3.8.3.1 New or Altered Utilities

Issue 1: Would the project result in the need for new systems or require substantial alterations to existing utilities, the construction of which would create physical impacts (water, sewer, natural gas, communications systems, and solid waste disposal)?

Issue 5: Would the project have an effect upon, or result in a need for new or altered solid waste facilities?

Impact Analysis

Water

Community Plan Amendment and Rezone

Similar to existing conditions, the City's PUD would continue to serve the project site. As previously detailed, SB 610 require a discussion regarding the availability of water to meet projected water demands of large-scale projects. As defined in SB 610, large-scale projects include residential development projects of more than 500 residential units. The project includes an amendment to the CMCP and rezone that would allow for a residential development with a maximum of 404 units. As the proposed project includes less than 500 units, the project does not meet the CEQA significance threshold of SB 610, and therefore, a water supply assessment and verification is not required for the project. Thus, the proposed project would not require the construction of new water treatment facilities or an expansion of existing facilities, and impacts would be less than significant.

Site Demolition and Preparation

In addition to the amendment to the Community Plan and rezone, the proposed project also includes the demolition of the existing unoccupied buildings and related facilities on-site, disposal of the demolition debris, mass grading of the site, and existing utilities stubbed out to the project site boundary. Demolition would require some water for dust control, which would be provided by water trucks and would not affect the City's water supply. No other water would be required for demolition or site preparation activities. Therefore, no impact would occur.

Wastewater

Community Plan Amendment and Rezone

As previously detailed, the proposed amendment to the CMCP and rezone would allow for a future development with a maximum of 404 units, which could generate up to approximately 829 residents. Based on the City of San Diego PUD Sewer Design Guide, the future development would result in an increased generation of approximately 67,154 gpd (or 0.06 mgd) of wastewater, as shown in **Table 3.8-3**. This estimate is conservative, as it does not take into account the historical wastewater generation that has occurred at the project site.

Table 3.8-3
Proposed Wastewater Generation

Land Use Category	Area (units or SF)	Average Daily Wastewater Generation	Total Average Wastewater Generation
Residential	404 units (829 people)	166 gpd per unit	67,064 gpd
Commercial (Community Accessible Ground Floor Space)	1,500 SF	0.06 gpd per SF	90 gpd
Total			**67,154 gpd**

SOURCE: Wastewater demand factors from the City of San Diego Sewer Design Guide (City of San Diego 2015b)

Similar to existing conditions, the City's PUD would continue to serve the project site. The NCWRP has a maximum treatment capacity of 30 mgd, and is currently operating at approximately 16 mgd (City of San Diego 2016). Thus, the NCWRP has a remaining treatment capacity of 14 mgd. The future development's wastewater generation of 0.06 mgd would be less than one percent of this remaining capacity. This remaining treatment capacity of the NCWRP is considered adequate to serve the future development's wastewater demands. The proposed project would not require the construction of a new or expanded wastewater facilities, and impacts would be less than significant.

Site Demolition and Preparation

In addition to the amendment to the Community Plan and rezone, the proposed project also includes the demolition of the existing unoccupied buildings and related facilities on-site, disposal of the demolition debris, mass grading of the site, and existing utilities stubbed out to the project site boundary. Demolition would require a minimal amount of wastewater generated by construction workers. Wastewater generated during demolition would be collected within portable toilet facilities. All wastewater generated in portable toilets would be collected by a permitted portable toilet waste hauler and appropriately disposed of at an identified liquid-disposal station, which would not affect the City's existing wastewater system. Therefore, construction or expansion of wastewater facilities would not be required for demolition of the project site, and no impact would occur.

Natural Gas

Community Plan Amendment and Rezone

Refer to Section 3.2, Energy, for a discussion on the demand of natural gas at the project site. Any construction of natural gas lines associated with the future development would occur in accordance with the City and SDG&E's permitting processes and construction standards to avoid or minimize impacts on environmentally sensitive habitat areas and landforms through siting, grading or excavation, and erosion. Therefore, impacts associated with natural gas facilities from buildout of the future development would be less than significant.

Site Demolition and Preparation

Demolition of the project site would not require new or expanded natural gas lines. Any temporary need for on-site power would be obtained through mobile generators. Thus, no impact would occur.

Communications Systems

Community Plan Amendment and Rezone

Communication systems for telephone, internet, and cable television are serviced throughout the city by utility providers such as Cox, Spectrum Time Warner, AT&T, and other private utility companies. Future siting of communications infrastructure would be in accordance with the Land Development Code, including Section 141.0420 regulating wireless communications facilities, as well as the City's Wireless Communications Facilities Guidelines, which seek to minimize visual impacts. Any construction of communications systems associated with future development would occur in accordance with the City's permitting processes and construction standards to avoid or minimize impacts on environmentally sensitive habitat areas and landforms through siting, grading or excavation, and erosion. Therefore, impacts associated with communications facilities from buildout of the future development would be less than significant.

Site Demolition and Preparation

Demolition of the project site would not require new or expanded telephone, internet, or cable television service, as construction workers would use their current cell phone company provider to make necessary calls. Thus, no impact would occur.

Solid Waste

Community Plan Amendment and Rezone

The City's threshold for direct impacts on solid waste facilities are projects that include the construction, demolition, or renovation of 1,000,000 SF or more of building space, as they may generate approximately 1,500 tons of waste or more, creating a direct impact. Construction of the future development would generate a variety of solid waste consisting of metals, concrete, asphalt, wood, plastics, and other building materials, some of which can be recycled. Multi-family residential construction is expected to generate approximately 1.2 tons of waste per unit per year (City of San Diego 2012). Nonresidential construction (the proposed future community use) is expected to generate approximately 0.00028 tons of waste per square foot per year (City of San Diego 2012). As shown in **Table 3.8-4**, operation of the future proposed development would generate a total of approximately 486 tons of solid waste per year. While the design and exact SF of the future development is currently unknown at the time of this analysis, the construction of the future development would be expected to generate 486 tons of solid waste per year, which is under the City's direct impact threshold of 1,500 tons of waste or more. Therefore, a less than significant impact would occur related to need for new or altered solid waste facilities.

Table 3.8-4
Solid Waste Generation Estimates for Project Construction

Land Use Category	Area (units or SF)	Total Solid Waste Generation Rate	Total Solid Waste Generation (tons per year)
Residential	404 units	1.2 tons per unit	484.8 tons per year
Community Accessible Ground Floor Space[1]	1,500 SF	0.00028 tons per SF	0.42 tons per year
Total			**485.22 tons per year**

[1] The commercial land use category generation rates were used for the ground floor space.

SOURCE: City of San Diego 2012

Similar to construction, the City's threshold for direct operational impacts on solid waste facilities are projects that include the construction, demolition, or renovation of 1,000,000 SF or more of building space, as they may generate

approximately 1,500 tons of waste or more, creating a direct impact. Operation of the future development would continue to be serviced by the City of San Diego Environmental Services Department, which operates the solid waste collection and disposal services to residents throughout the city. The estimated annual waste to be generated during occupancy of the future development is based on findings from the State of California's Department of Resources Recycling and Recovery (CalRecycle) Residential and Commercial Sector Generation Rates (CalRecycle 2019b). The generation rate is based on the average of five case studies for multi-family projects and three case studies for commercial retail projects. The studies found that the estimated solid waste generation rate for multi-family units is an average of 5.1 pounds per dwelling unit per day, and for commercial projects is an average of 0.02 pounds per SF per day. Once buildout is complete, the future development could generate approximately 382 tons of solid waste per year, as shown in **Table 3.8-5**. Based on the site capacity established by the CPA, the operation of the future development would likely generate approximately 382 tons of solid waste per year, which is under the City's direct impact threshold of 1,500 tons of waste or more.

Table 3.8-5
Operational Solid Waste Generation

Land Use Category	Area (units or SF)	Total Solid Waste Generation Rate	Total Solid Waste Generation
Residential	404 units	5.1 pounds per unit per day	376 tons per year
Commercial (Community Accessible Ground Floor Space)	1,500 SF	0.02 pounds per SF per day	6 tons per year
Total			**382 tons per year**

SOURCE: CalRecycle 2019b

Further, the proposed project would comply with all state and local regulations pertaining to solid waste management and diversion, including state's goals established in AB 939, AB 1327, and AB 341. In addition, per the City's Recycling Ordinance, solid waste would be recycled during operation to the maximum extent possible. The City's Recycling Ordinance requires on-site recyclable collection, including the recycling of plastic and glass bottles, paper, newspaper, metal containers, and cardboard. With implementation of the City's Recycling Ordinance, the proposed project would not result in the need for new or altered solid waste facilities, and a less than significant impact would occur related to solid waste associated with the operation of the future development.

Site Demolition and Preparation

As previously detailed, the City's threshold for direct impacts on solid waste facilities are projects that include the construction, demolition, or renovation of 1,000,000 SF or more of building space, as they may generate approximately 1,500 tons of waste or more. The proposed project would include demolition of the existing onsite structures, parking areas, and landscaping. The project site is currently developed with a 66,000 SF building, 36,000 SF warehouse building, and a 1,500 SF garage, for a total of 103,500 SF. Demolition of the existing buildings and site improvements would be under the City's threshold of 1,000,000 SF. The demolition portion of the proposed project would not result in a need for new or altered solid waste disposal facilities, and impacts would be less than significant.

3.8.3.2 Water Conservation and Landscaping

Issue 4: Would the project use excessive amounts of water?

Issue 5: Would the project include landscaping which is predominantly non-drought resistant vegetation?

Impact Analysis

Community Plan Amendments and Rezone

As detailed in the CPIOZ Type A (CPIOZ-A) design standards of the Community Plan Amendment (CPA) (Appendix B), a minimum of 15 percent of the project site would be required to be landscaped under the future development. In addition, street trees would be required to be planted and maintained along public street frontages. At the time of this analysis, it is unknown the type of plants that would be planted. However, the future development allowed by the project would be built as a Leadership in Energy and Environmental Design (LEED) Silver or equivalent. While the LEED checklist has not been completed at the time of this analysis and exact measures and credits are unknown, the LEED checklist includes requirements for indoor and outdoor water use reductions (USGBC 2019). By adhering to LEED Silver or equivalent standards, the future development would be required to include water conservation features, including but not limited to using drought resistant landscaping and low flow plumbing fixtures.

By adhering to LEED Silver or equivalent standards, the future development would be required to reduce its water use, and would not use excessive amounts of water. Therefore, impacts related to indoor and outdoor high water use and landscaping would be less than significant.

Site Demolition and Preparation

The proposed project would include demolition of the existing onsite structures, parking areas, and landscaping. As previously detailed in Section 3.8.3.1 above, demolition would require some water for dust control, which would be provided by imported water trucks. No other water would be required for demolition of the existing structure, and no landscaping would be part of this phase. Demolition would not use excessive amounts of water, and no impact would occur.

3.8.4 Cumulative Impact Analysis

3.8.4.1 Water and Wastewater

The geographic scope for cumulative impacts on water and wastewater resources is the City's PUD service system. Cumulative impacts associated with water and wastewater could occur if the proposed project, in combination with cumulative projects, resulted in a need for new systems which would create physical impacts. Construction and operation of the proposed project, in combination with cumulative projects, would result in an increased demand for water and wastewater services. The City, as the provider of water and wastewater facilities, would confirm availability of adequate water supply, water treatment capacity, and wastewater treatment capacity prior to future project approval. In addition, the City has established a capacity fee structure for all projects to ensure that the City can continue to maintain water and sewer connections and water flow new and altered developments (City of San Diego 2014). These fees would apply to both the proposed project and future cumulative projects, and would provide for the development of additional facilities to service new development and population, as needed. In addition, the City anticipates growth within its boundaries, which is consistent with the projections of the City's 2015 Urban Water Management Plan. The City's water supply projections anticipate an increase through 2040, despite drought and environmental restrictions, due to water conservation. The City's projected supply of water will meet demand through 2040 (as shown on Tables 3.8-1 and 3.8-2). The City would continue to monitor population growth and update water and sewer facility planning to adjust changes in growth and economic conditions. With these factors, it can be reasonably assumed that the City would continue to keep pace with the population growth within the City such that demand and performance objectives of water supply and wastewater systems are met. As a result, cumulative impacts related to water and wastewater facilities would be less than significant, and no mitigation measures would be required.

3.8.4.2 Solid Waste

The geographic scope for the analysis of cumulative impacts in regards to landfill capacity is the Miramar Landfill. The Miramar Landfill has a remaining capacity of 11,612,073 tons, and is estimated to reach capacity by 2030. Although there is limited landfill capacity, cumulative projects would be required to comply with City ordinances regarding recycling and the required diversion rate of solid waste to ensure solid waste generation is minimal.

In addition, per City policy, cumulative projects (including the proposed project) that include construction, demolition, and/or renovation of 40,000 SF or more of building space are required to prepare waste management plans to show waste diversion measures. As detailed above, the proposed project would demolish 103,500 SF of existing buildings, which would be above the City's threshold of 40,000 SF. However, the demolition and site preparation phase of the project would occur under the jurisdiction of the County, and would be required to implement the County Construction and Demolition Debris Deposit Ordinance. The ordinance requires contractors to submit a Construction and Demolition Debris Management Plan, where the contractor shall divert 90 percent of inert materials and 70 percent of all other materials of the project. Therefore, the demolition and site preparation phase of the proposed project would not contribute to a cumulatively considerable impact.

Construction and operation of the future development would occur under the jurisdiction of the City. While the design and exact SF of the future development is currently unknown at the time of this analysis, it is likely that the future development would be greater than 40,000 SF, resulting in a potentially significant cumulative impact. However, the proposed project would be required to prepare a project-specific waste management plan as a condition of the building permit (as detailed in Appendix B). According to the City's CEQA Significance Determination Thresholds, implementation of a project-specific waste management plan would reduce cumulative solid waste impacts to below a level of significance. Therefore, in combination with cumulative projects, the future development would not contribute to a cumulatively considerable impact on landfill capacity.

3.8.5 Significance of Impacts Prior to Mitigation

Impacts related to utilities and service systems would be less than significant.

3.8.6 Mitigation

No mitigation measures are required.

3.8.7 Conclusion

The proposed project would not result in the need for new systems or require substantial alterations to existing utilities, the construction of which would create physical impacts, including water, sewer, and solid waste disposal. In addition, the proposed project would not use excessive amounts of water or include landscaping that is non-drought resistant. Impacts related to utilities and service systems would be less than significant, and no mitigation would be required.

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CHAPTER 4.0 PROJECT ALTERNATIVES

4.1 Scope and Purpose

CEQA Guidelines Section 15126.6(a) of the State CEQA Guidelines requires that an EIR compare the effects of a "reasonable range of alternatives" to the effects of a project. Section 15126.6(a) also provides that an EIR need not consider every conceivable alternative to a project. Instead, the EIR must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. However, an EIR need not consider alternatives that are infeasible. There also is no ironclad rule governing the nature or scope of the alternatives to be discussed in an EIR, other than the "rule of reason." The "rule of reason" governing the range of alternatives specifies than an EIR should only discuss those alternatives necessary to foster meaningful public participation and informed decision-making.

Because an EIR must identify ways to mitigate or avoid significant effects that a project may have on the environment (Public Resources Code Section 21002.1), the purpose of an EIR's alternatives discussion is to focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project, even if the alternatives would impede to some degree the attainment of the project's objectives or be more costly. Further, CEQA requires that an EIR identify the environmentally superior alternative from among the alternatives.

The proposed project would result in potential impacts to the following categories: (1) those impacts determined not to be significant, including aesthetics, biological resources, agriculture and forestry resources, cultural resources, energy, geology/soils/seismicity, greenhouse gas emissions, hydrology, mineral resources, population and housing, recreation, public services, utilities, tribal cultural resources, land use and planning and wildfire, and (2) those impacts reduced to less than significant with implementation of mitigation measures, including air quality, hazards and hazardous materials, and noise and vibration. The proposed project would also result in impacts that would be partially mitigated but remain significant and unavoidable on a direct and cumulative level for transportation/traffic because improvements were either infeasible or not assured such that all of the impacts would be reduced to a less-than-significant level.

The focus of this alternatives analysis is on their ability to reduce or substantially lessen the significant impacts of the proposed project described above; however, a brief discussion is provided on whether or not the alternatives would change any of the impacts that were determined to not be significant (i.e., other resources areas). Collectively, this information allows for the project to be compared against the merits of each alternative.

For each of the alternatives identified, the EIR conducted the following assessment:

- Described the alternative;
- Identified the impacts of the alternative and evaluated the significance of those impacts; and
- Evaluated each alternative relative to the proposed project, specifically addressing project objectives, avoidance or reduction of significant impacts, and comparative merits.

The EIR has specifically evaluated three (3) alternatives to the proposed project as follows:

1. No Project / No Redevelopment Alternative
2. No Project / Existing Community Plan and Zoning Alternative
3. Reduced Intensity Project Alternative – 312 Units

4.2 Criteria for Selection and Analysis of Alternatives

The criteria for the selection and analysis of alternatives are provided in CEQA Guidelines Section 15126.6(c). In order to be considered feasible, the alternatives must (1) meet most of the project objectives and (2) avoid or substantially lessen the significant impacts resulting from the proposed project (specifically, air quality, hazards and hazardous materials, noise and vibration and transportation and traffic).

4.2.1 Project Objectives

The following project objectives have been established by the County of San Diego (County) for the proposed project:

1. Establish the ability for residential developers to construct affordable homes on surplus County property, consistent with San Diego regional housing policies.
2. Deliver a development-ready site, including demolition and removal of existing onsite structures and related facilities, and provision of stubbed-out utilities.
3. Encourage an increase in the supply and variety of housing types – affordable for people of all ages and income levels – in an area with existing or planned frequent transit service (i.e., transit priority area) and with access to a variety of public and commercial services.

4. Ensure high quality development occurs on the site through the development of architectural and landscape supplemental development regulations.

4.2.2 Feasibility

CEQA Guidelines Section 15126.6(f)(1) identifies the factors to be taken into account to determine the feasibility of alternatives. The factors include site suitability; economic viability; availability of infrastructure; general plan consistency; other plans or regulatory limitations; jurisdictional boundaries; and whether the applicant can reasonably acquire, control, or otherwise have access to the alternative site. Not one of these factors establishes a fixed limit on the scope of reasonable alternatives. An alternative does not need to be considered if its environmental effects cannot be reasonably ascertained and if implementation of such an alternative is remote or speculative.

4.2.3 Evaluation of Significant Impacts

According to CEQA Guidelines Section 15126.6(b), the alternatives discussion should focus on those alternatives that, if implemented, could eliminate or reduce any of the significant environmental impacts of the project. The alternatives will be evaluated to determine if, as anticipated when selected as alternatives, they eliminate any significant adverse environmental effects or reduce them to a less-than-significant level. The project-related impacts addressed in this analysis are those that are identified as potentially significant prior to the incorporation or implementation of any mitigation measures.

The performance of the alternatives relative to the proposed project will be evaluated to determine the “comparative merits of the alternatives.” (CEQA Guidelines Section 15126.6(a)) This analysis will be based, in part, on a comparison to the proposed project’s impacts. It also will include a discussion of the relative feasibility of each alternative.

4.3 Rationale for the Selection of Alternatives

4.3.1 Alternatives Considered but Rejected

The following alternatives were considered but rejected due to either being infeasible, the County not controlling the property or not meeting most of the basic project objectives:

- **Alternative Site (Surplus County Owned Property) – San Diego County**

  Eleven other County owned properties within the County were identified as “surplus” and proposed for affordable housing redevelopment (AECOM

2017a). The majority of the 11 sites are located within the City of San Diego, while one each are in the City of Escondido, City of El Cajon, and the County. A screening process was used to determine whether each site was conducive to affordable housing, including a land use and zoning analysis, environmental due diligence, screening criteria determination, and development opportunity identification. The development opportunity assessment took into consideration such factors as commercial/retail and public transit proximity and land use compatibility. The County's goal in evaluating its surplus properties for affordable housing redevelopment potential was to identify as many sites as possible that would be viable given the existing and projected regional housing shortfall for lower income individuals.

Of the 11 screened sites, only 5 of the sites were deemed viable for affordable housing, including the proposed project site (AECOM 2017b). None of the viable sites were determined to be an alternative location for the proposed project because they were less conducive than the Mount Etna site for near-term redevelopment, already planned for other land uses, were not currently available for lease, and/or were not located near commercial retail/office uses and within an existing or planned transit priority area (TPA) to serve the needs of future residents.

- **Alternative Site (Surplus County Owned Property) - Community Plan Area**

  There were no other County owned surplus properties in the Clairemont Mesa Community Plan (CMCP) area that were evaluated as an alternative site for the proposed project. Of the 11 sites screened for their potential for redevelopment and the 5 sites that were recommended as viable, the only site in the Clairemont Mesa Community Plan area was the Mount Etna property. The other sites are located in the Midway District of the City of San Diego, downtown San Diego, City of El Cajon, and City of Escondido. Therefore, no other surplus County-owned property exists in the Community Plan area that could serve as a viable alternative location for the proposed project and such an alternative was not further evaluated in this analysis.

- **Proposed Clairemont Mesa Community Plan Update Land Use Designation**

  The project site is located within Focus Area 6, Subarea 6C of the draft CMCP Update (City of San Diego 2019). The CMCP Update is a work in progress. The initial land use scenarios were released for public comment on February 13, 2019 as part of a broad online community engagement effort to solicit feedback on future development. The existing CMCP land use designation for the project site is Commercial-Community Center and there a limited number of residential units allowed. There are currently three potential land use designation options being studied in Subarea 6C

(13.1 total acres including the 4.09-acre project site): (1) Community Commercial (0-44 dwelling units per acre [du/ac]) – mixed use with 183 residential units, (2) Community Commercial (0-54 du/ac) – mixed use with 283 residential units, and (3) Community Commercial (0-73 du/ac) – mixed use with 347 residential units. These optional residential unit densities and unit counts apply to the entire 13.1-acre Subarea 6C, and as such it is difficult to determine the actual unit count that would be allowed on the 4.09-acre project site portion of the subarea. Using a straight percentage approach, 38 percent of the potential units could be allocated to the project site, under this alternative, resulting in either 70, 108 or 132 affordable residential units. In addition, a mix of uses besides residential would be allowed under the draft CMCP Update land use designations. As the CMCP Update is in work in progress with an undetermined final land use designation for the project site, and a substantially reduced number of possible residential units than the proposed project, the alternative is not further evaluated in the EIR because of its speculative nature.

- **Alternative Land Use**

  During the NOP review period and public scoping process, a number of community members and interested parties suggested that the County entitle and permit development of the site for non-residential uses or specific types of residential development. For instance, suggestions were made to consider developing the site with a medical facility (i.e., County Health Department), community library, Department of Motor Vehicles facility, commercial business use, community park, recreation center, and dog park, among other uses. Suggestions were also made to consider senior-only housing or units for military members. Because of its commercial designation under the General Plan and CMCP, all of the suggested non-commercial alternative land uses or residential types would require an amendment of the CMCP and rezone of the site. Further, the suggested non-residential uses would likely not reduce any impacts of the proposed project. In addition, none of these suggested uses would meet the basic project objectives of amending the CMCP to allow for the future redevelopment of the site for affordable housing. In addition, uses such as a dog park would not benefit from being implemented in a TPA because they are not high-trip generating uses nor would they increase the supply and variety of housing types in the County and City. Thus, an alternative land use scenario is not further evaluated in the EIR.

4.4 No Project / No Redevelopment Alternative

4.4.1 No Project / No Redevelopment Alternative Description and Setting

The No Project/No Redevelopment Alternative would not require a Community Plan Amendment (CPA) and rezone from the City of San Diego and the existing vacated San Diego County Regional Crime Lab (Crime Lab) facility would remain

on the project site. None of the proposed building demolition (i.e., 103,500 square feet [SF]) would occur and the project site would not be regraded to prepare a developable pad. Affordable housing would not ultimately be constructed under this alternative, further exacerbating the lack of affordable housing in the San Diego County region. The existing structures would remain unoccupied. Alternatively, implementation of the existing land use and underlying zoning is addressed under Section 4.3.

4.4.2 Relationship to Project Objectives

The No Project / No Redevelopment Alternative does not meet any of the project objectives. Specifically, this alternative would not amend the land use or change the zoning to allow for the future development of affordable housing units; would not expand the range of housing available within the San Diego County region in a TPA; would not deliver a graded and improved site for future development; would not ensure high quality development occurs on the site through site-specific development regulations; and would not increase mobility for pedestrians or improve site access.

4.4.3 Comparison of Effects of Alternative to the Proposed Project

4.4.3.1 Air Quality

Under the No Project / No Redevelopment Alternative, none of the construction phase or operational pollutant emissions attributable to approving and implementing the proposed project would be generated. Elimination of these emissions would not avoid or lessen a significant impact since none were identified for the proposed project, as described in Section 2.2, Air Quality, of this EIR. However, construction-related health risk impacts (i.e., maximum incremental increase in risk) for residential receptors in the project area would be avoided by the No Project / No Redevelopment Alternative. Significant air quality impacts of the project would not occur and no air quality mitigation would be required under this alternative.

4.4.3.2 Hazards and Hazardous Materials

Because site demolition and preparation would not occur under this alternative, project impacts related to the handling of hazardous materials, such as asbestos and lead materials, within a quarter-mile of a school would be avoided and there would be no need for mitigation. In addition, project impacts to public health due to the proposed removal of the underground storage tank (UST) and potential to encounter contaminated media would not occur. The No Project / No Redevelopment Alternative would avoid potentially significant impacts related to being located on a site which is included on a list of hazardous materials site compiled pursuant to Government Code Section 65962.5. Significant impacts

would not occur and no hazards or hazardous materials mitigation would be required under this alternative.

4.4.3.3 Noise and Vibration

Project construction would result in potentially significant impacts to nearby sensitive receptors, the impacts of which would be avoided by this alternative. No construction equipment noise would be produced because no redevelopment of the project site would occur. The buildings would continue to be vacant and no operational noise would be produced under this alternative. Significant impacts would not occur, and no noise mitigation would be required under this alternative.

4.4.3.4 Transportation and Traffic

Under the No Project / No Redevelopment Alternative, operational traffic associated with the proposed project would not be produced and Existing, Near-term or Long-term traffic conditions on the roadway network surrounding the project site. No additional traffic would be generated by this site in the future since the existing facility would remain vacant. Therefore, significant and unavoidable project impacts to roadway segments and intersections in the Clairemont Mesa community would be avoided and no mitigation would be required under this alternative. No impacts related to traffic hazards and vehicle miles travelled (VMT) would occur under this alternative.

4.4.3.5 Other Less than Significant Resource Topics

Because the No Project / No Redevelopment Alternative would not result in any changes to the project site and the existing vacant Crime Lab facility would remain, even the project impacts that would be less than significant would not occur. Thus, no impacts to aesthetics, biological resources, agriculture and forestry resources, cultural resources, energy, geology/soils/seismicity, greenhouse gas emissions, hydrology, mineral resources, population and housing, recreation, public services, utilities, tribal cultural resources, land use and planning and wildfire would be expected under this alternative.

4.5 No Project / Existing Community Plan and Zoning Alternative

4.5.1 No Project / Existing Community Plan and Zoning Description and Setting

The No Project / Existing Community Plan and Zoning alternative would not require a CPA and rezone and the existing vacated Crime Lab facility would be demolished and the site sheet graded to prepare for future commercial development. Land uses permitted under the Commercial-Community Center designation include shopping areas with retail, service, civic, and offices uses for the community at large. Specifically, the project site is currently zoned

Commercial Office (CO-1-2) which is to provide employment uses with limited, complementary retail uses and residential uses as specified, and is intended to apply in large-scale activity centers or in specialized areas where a full range of commercial activities is not desirable (SDMC Section 131.0504). Under this alternative, the project site would be available for sale to a developer for the construction of a commercial office development. This alternative would allow for the future construction of up to 70,000 SF of commercial office development, specifically as medical office use, with supporting retail space, as permitted by the development regulations for the CO-1-2 zone. Any future redevelopment of the project site would undergo review by City staff for compliance with the CMCP Community Core CPIOZ B requirements related to architectural/site design, parking design, landscaping, signage and pedestrian/bicycle circulation. Buildings would be limited to 30 feet in height in accordance with the overlay zone in the CMCP.

4.5.2 Relationship to Project Objectives

The No Project / Existing Community Plan and Zoning Alternative would not meet the basic project objectives. Specifically, this alternative would not amend the site's land use or change the zone to allow for the future development of affordable housing units and would not expand the range of housing available within the San Diego County region in a TPA. The project site could be made development-ready, including demolition and removal of existing onsite structures and related facilities; however, commercial office use would not fulfill the regional housing goals to construct more affordable residential housing, which would be non-existent under this alternative.

4.5.3 Comparison of Effects of Alternative to the Proposed Project

4.5.3.1 Air Quality

Under the No Project / Existing Community Plan and Zoning Alternative, similar construction phase or operational pollutant emissions attributable to approving and implementing the proposed project would be generated. While implementation of this alternative would not require changes to land use or zoning, redevelopment of the site with commercial office uses (with limited retail and residential), as permitted under the CMCP and SDMC, would still require site demolition and preparation activities using heavy construction equipment. Even if the existing structures were reused, there would be a need to improve the site to current architectural, landscaping, parking and lighting standards in compliance with the requirements of the Land Development Code. Emissions associated with those construction activities would, however, be less than those anticipated for the proposed project since a lower-stature structure would likely be constructed due to the 30-foot height limit that exists throughout most of the CMCP area. Because the impacts of the project would not exceed stated thresholds and less

construction would be involved with this alternative, less than significant impacts similar to the proposed project would be expected. Construction-related health risk impacts (i.e., maximum incremental increase in risk) for residential receptors in the project area would not be avoided by the No Project / Existing Community Plan and Zoning Alternative because of the need for heavy equipment to redevelop the site with a commercial office uses. As such, significant air quality impacts would still occur and air quality mitigation (Mitigation Measure AIR-1) would be required under this alternative.

4.5.3.2 Hazards and Hazardous Materials

Project impacts related to the handling of hazardous materials, such as asbestos and lead materials, within a quarter-mile of a school would not be avoided because implementation of the existing land use and zoning would lead to redevelopment of the project site with commercial office uses. In addition, project impacts to public health would not be avoided due to the proposed removal of the UST and potential to encounter contaminated media because the site is included on a list of hazardous materials site compiled pursuant to Government Code Section 65962.5. The same significant impacts associated with the project would occur and hazards or hazardous materials mitigation (Mitigation Measure HAZ-1) would be required under this alternative.

4.5.3.3 Noise and Vibration

Project construction would result in potentially significant impacts to nearby sensitive receptors, the impacts of which would not be avoided by this alternative due to the site preparation, demolition and building construction that would occur. Construction equipment noise would be produced during redevelopment of the project site. Operational noise would also be produced by this alternative related to stationary equipment and traffic activity, although less than significant impacts would be similar to the proposed project. Therefore, significant impacts would occur and noise mitigation (Mitigation Measure NOI-1) would be required under this alternative.

4.5.3.4 Transportation and Traffic

Under the No Project / Existing Community Plan and Zoning Alternative, operational traffic associated with the proposed project would still be produced which would cause impacts to Existing, Near-term or long-term traffic conditions on the roadway network surrounding the project site. Assuming up to 70,000 SF of medical office space would be developed on site, this alternative would generate 3,395 daily trips (including a 3 percent transit reduction). **Table 4-1** shows of the trip generation associated with the No Project/Existing Community Plan and Zoning Alternative based on the City's trip generation manual. This alternative would increase the project's total ADT by 1,377 and increase AM

peak hour trips by 60, while PM peak hour trips would increase by 174, as compared to the proposed project. Therefore, significant and unavoidable project impacts to roadway segments and intersections in the Clairemont Mesa community would likely increase ~~and mitigation (Mitigation Measures TRA-1 through TRA-3) would still be required under this alternative to mitigate for the project's direct impacts~~. Less than significant impacts related to traffic hazards and vehicle miles travelled (VMT) would occur under this alternative because access points would be constructed in accordance with the City's Street Design Manual and the project would still be located in a TPA.

Table 4-1
Driveway Trip Generation – No Project/Existing Community Plan and Zoning Alternative

					AM Peak Hour					PM Peak Hour				
Land Use	**Units**	**Trip Rate**	**% Daily**	**ADT**	**%**	**Trips**	**Split**	**In**	**Out**	**%**	**Trips**	**Split**	**In**	**Out**
Office- Medical Office	70 ksf	50/ ksf	-	3,500	6%	210	(8:2)	168	42	10%	350	(7:3)	105	245
~~Office~~ Residential Reduction due to Transit Stations*	-	-	3%	-105	5.5%	-12		-9	-~~3~~2	2%	-7		-2	-5
Total				**3,395**		**198**		**159**	**39**		**343**		**103**	**240**

Source: Chen-Ryan 2019
Notes:
* Trip reductions applied per the City of San Diego Traffic Impact Study Manual (July 1998)
** Trip generation developed using methods in City of San Diego Land Use Code – Trip Generation Manual (May 2003)

4.5.3.5 Other Less than Significant Resource Topics

Because the No Project / Existing Community Plan and Zoning Alternative would not result in any changes to the planned land use for the project site and the existing vacant Crime Lab facility would be redeveloped with commercial office uses, project impacts would occur and continue to be less than significant. Thus, less than significant impacts to aesthetics, biological resources, agriculture and forestry resources, cultural resources, energy, geology/soils/seismicity, greenhouse gas emissions, hydrology, mineral resources, population and housing, recreation, public services, utilities, tribal cultural resources, land use and planning and wildfire would be expected under this alternative.

4.6 Reduced Intensity Project Alternative

4.6.1 Reduced Intensity Project Alternative Description and Setting

The Reduced Intensity Project Alternative would result in the same CPA and zone change as the proposed project and the existing vacated Crime Lab facility

would be demolished. Under this alternative, the project site would be entitled for the construction of a 312-unit affordable housing project, which would house approximately 633 people. This alternative was developed to reduce the proposed project's direct traffic impacts on roadway segments or intersections by decreasing the unit count to a point where at least one traffic impact would be reduced to less than significant. Reducing units would reduce both the volume of daily trips generated by the site and the number of peak hour trips occurring during the most impacted periods of the day. Under this alternative the permitted unit count would be reduced from 404 units to 312 units. All other aspects of the project (including building above the 30-foot height limit) would remain the same as the proposed, except that the required amount of parking would be reduced to reflect the lower number of residents.

4.6.2 Relationship to Project Objectives

The Reduced Intensity Project Alternative would meet many of the basic project objectives. Specifically, this alternative would amend the land use or change the zone to allow for the future development of affordable housing units; would expand the range of housing available within the region in a TPA; and would ensure high quality development occurs on the site through site-specific development regulations. The project site could be made development-ready, including demolition and removal of existing onsite structures and related facilities; however, this alternative would not provide as much housing supply (i.e., 92 less affordable units) as the proposed project, effectively conflicting with County and City policies maximize affordable housing supply in response to the regional housing crisis.

4.6.3 Comparison of Effects of Alternative with the Proposed Project

4.6.3.1 Air Quality

Under the Reduced Intensity Project Alternative, similar construction phase or operational pollutant emissions attributable to approving and implementing the proposed project would be generated. Redevelopment of the site with residential development, as permitted under the amended CMCP and SDMC, would require site demolition and preparation activities using heavy construction equipment similar to those associated with the proposed project. Emissions associated with those construction activities could, however, be less than those anticipated for the proposed project since a lower-stature structure would likely be constructed due to the unit reduction. Because the impacts of the project would not exceed stated thresholds and less construction would be involved, this alternative would also have less than significant impacts similar to the proposed project. Construction-related health risk impacts (i.e., maximum incremental increase in risk) for residential receptors in the project area would not be avoided by the Reduced Intensity Project Alternative because of the need for heavy equipment

to redevelop the site with residences. As such, significant air quality impacts of the project would still occur and air quality mitigation (Mitigation Measure AIR-1) would be required under this alternative.

4.6.3.2 Hazards and Hazardous Materials

Project impacts related to the handling of hazardous materials, such as asbestos and lead materials, within a quarter-mile of a school would not be avoided because implementation of the alternative would lead to redevelopment of the project site with residential use. In addition, project impacts to public health due to the proposed removal of the UST and potential to encounter contaminated media because the site is included on a list of hazardous materials site compiled pursuant to Government Code Section 65962.5. The same significant impacts associated with the project would occur and hazards or hazardous materials mitigation (Mitigation Measure HAZ-1) would be required under this alternative.

4.6.3.3 Noise and Vibration

Project construction would result in potentially significant impacts to nearby sensitive receptors, the impacts of which would not be avoided by this alternative due to the site preparation, demolition and building construction that would occur. Construction equipment noise would be produced during redevelopment of the project site and would have the potential to expose nearby sensitive receptors to noise in excess of the City's thresholds. Operational noise would also be produced by this alternative related to stationary equipment and traffic activity. The reduction in trips under this alternative would not appreciably reduce traffic-related noise. Therefore, significant impacts would occur and noise mitigation (Mitigation Measure NOI-1) would be required under this alternative.

4.6.3.4 Transportation and Traffic

Under the Reduced Intensity Project Alternative, operational traffic associated with the proposed project would still be produced which would cause significant impacts to Existing, Near-term or Cumulative plus Project traffic conditions on the roadway network surrounding the project site. However, the reduced trip generation and peak hour traffic would lessen project impacts on area intersections and would avoid a cumulatively significant roadway segment impact along Balboa Avenue between its intersections with Charger Boulevard and the Intestate 805 (I-805) southbound ramps. **Table 4-2** shows the trip generation driveway rates of this alternative. **Table 4-~~2~~3** shows a comparison of the project impacts with those of the Reduced Intensity Project Alternative along the Balboa Avenue roadway segment significantly impacted by the proposed project.

Table 4-2 Trip Generation Driveway Rates – Reduced Intensity Project Alternative

Land Use	Units	Trip Rate	% Daily	ADT	AM Peak Hour					PM Peak Hour				
					%	Trips	Split	In	Out	%	Trips	Split	In	Out
Residential – Multi – Family	196 Units	6 / Unit	-	1,176	8%	95	(2:8)	19	76	9%	106	(7:3)	74	32
Residential - Retirement/ Senior Citizen Housing	116 Units	4 / Unit	-	464	5%	24	(4:6)	10	14	7%	33	(6:4)	20	13
			Subtotal	1,640		119		29	90		139		94	45
Residential Reduction due to Transit Stations*	-	-	3%	-82	5.5%	-11		-3	-8	2%	-8		-6	-2
			Total	1,558	-	108	-	26	82	-	131		88	43

Source: City of San Diego Land Use Code, Driveway Rate – Trip Generation Manual, May 2003

*Reductions applied from City of San Diego Traffic Impact Study Manual (July 1998)

Table 4-2~~3~~3
Roadway Segment Impact – Reduced Project Intensity Alternative

Roadway	Segment	Roadway Classification	LOS E Threshold	Project Trip Assignment: Total Project Trip Generation ADT	Project Trip Assignment: Project Trip Distribution	Project Trip Assignment: Project Trip Assessment ADT	Existing Conditions: Base ADT	Existing Conditions: V/C	Existing Conditions: LOS	Existing Plus Project: Ex + P ADT	Existing Plus Project: V/C	Existing Plus Project: LOS	Existing Plus Project: Δ	Existing Plus Project: S?
Balboa Avenue	Charger Blvd & I-805 South-bound Ramps	6-Lane Major Arterial	50,000	1,558	32%	499	61,846	1.237	F	62,345	1.247	F	0.010	No

Near Term: Base ADT	Near Term: V/C	Near Term: LOS	Near Term Plus Project: NT + P ADT	Near Term Plus Project: V/C	Near Term Plus Project: LOS	Near Term Plus Project: Δ	Near Term Plus Project: S?
63,430	1.269	F	63,929	1.279	F	0.010	No

Cumulative: Base ADT	Cumulative: V/C	Cumulative: LOS	Cumulative Plus Project: Hz + P ADT	Cumulative Plus Project: V/C	Cumulative Plus Project: LOS	Cumulative Plus Project: Δ	Cumulative Plus Project: S?
65,200	1.304	F	65,699	1.314	F	0.010	No

Notes:

S? = Significant impact?

* Connecting intersections (i.e. Balboa Ave/Charger Blvd and Balboa Ave/I-805 SB Ramps) operate at LOS D or better; therefore, the roadway segment is not considered to have a significant impact

Source: Chen Ryan 2019

As shown in the table, significant and unavoidable project impacts to one segment of Balboa Avenue in the Clairemont Mesa community in the Near-term plus Project and Cumulative plus Project scenarios (i.e., under all three access options) would be avoided by this alternative. However, significant and unavoidable direct impacts to another segment of Balboa Avenue, between Cannington and Charger, and cumulative impacts to the Mount Etna Drive roadway segment, between Mount Everest Boulevard and Genesee Avenue, would be reduced but not eliminated by this alternative. In addition, direct impacts to intersections would be lessened but not avoided ~~and mitigation (Mitigation Measures TRA-1 through TRA-3) would still be required~~ under this alternative, while cumulative impacts to intersections would remain significant and unavoidable because the mitigation is not fully funded ~~cannot be assured (Mitigation Measures TRA-4 and TRA-5)~~. Less than significant impacts related to traffic hazards, VMT and other circulation topics would still occur under this alternative because access points would be constructed in accordance with the City's Street Design Manual and the project would still be located in a TPA.

4.6.3.5 Other Less than Significant Resource Topics

Because the Reduced Intensity Project Alternative would result in changes to the planned land use for the project site to allow for future residential development and the existing vacant Crime Lab facility would be redeveloped, project impacts would occur. Thus, less than significant impacts to aesthetics, biological resources, agriculture and forestry resources, cultural resources, energy, geology/soils/seismicity, greenhouse gas emissions, hydrology, mineral resources, population and housing, recreation, public services, utilities, tribal cultural resources, land use and planning and wildfire would be expected under this alternative.

4.7 Summary of Alternatives

A summary of impacts of the alternatives compared to the proposed project is included in **Table 4-~~3~~4**, pursuant to CEQA Guidelines Section 15126.6(d).

Table 4-~~3~~4
Comparison of Alternatives to the Proposed Project

	Issue Area	Proposed Project Impacts	No Project / No Redevelopment Alternative	No Project/ Existing Community Plan and Zoning Alternative	Reduced Intensity Project Alternative
2.1	Air Quality	SM	LTS	SM(-)	SM
2.2	Hazards and Hazardous Materials	SM	LTS	SM	SM
2.3	Noise and Vibration	SM	LTS	SM	SM
2.4	Transportation and Traffic	SU	LTS	SU(+)	SU(-)

LTS = Less than significant
SM = Significant and mitigated
SU = Significant and unavoidable
(-) Impacts would be less than those of the proposed project
(+) Impacts would be greater than those of the proposed project

4.8 Environmentally Superior Alternative

CEQA Guidelines Section 15126.6(a) states that an EIR shall describe a range of reasonable alternatives. As evaluated in Chapter 2.0 of this EIR, the significant impacts of the proposed project would affect air quality (construction air toxic emissions); hazards and hazardous materials (USTs and asbestos/lead materials); noise (construction equipment noise); and transportation and traffic (roadway segment and intersection operations). As it would substantially lessen impacts to each of these issue topics to a less than significant level, the No Project Alternative / No Redevelopment Alternative would be the environmentally superior alternative.

However, CEQA Guidelines Section 15126.6(e)(2) also states that if the environmentally superior alternative is the “no project” alternative, the EIR shall also identify an environmentally superior alternative from among the other alternatives. The Reduced Intensity Project Alternative would be the environmentally superior alternative from the remaining alternatives, as it would reduce vehicle trips and avoid significant and unavoidable traffic impacts associated with the proposed project at one roadway segment location in the study area, and it would meet many of the basic project objectives.

CHAPTER 5.0 OTHER CEQA CONSIDERATIONS

This chapter presents the evaluation of other types of environmental impacts required by the California Environmental Quality Act (CEQA) that are not covered within the other chapters of this Environmental Impact Report (EIR). The other CEQA considerations include growth-inducing impacts, environmental effects that were found not to be significant, significant irreversible environmental changes that would be caused by the proposed project, and significant and unavoidable adverse impacts.

5.1 Growth-Inducing Impacts

Pursuant to Section 15126.2(e) of the CEQA Guidelines, an EIR must address whether a project will directly or indirectly foster growth. Section 15126.2(e) reads as follows:

> *[An EIR shall] discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth (a major expansion of a wastewater treatment plant might, for example, allow for more construction in service areas). Increases in population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. Also discuss the characteristic of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.*

A project's potential to induce growth does not automatically mean that it will result in growth. The potential for growth is affected by local government regulations including land use plans and policies and zoning ordinances. Growth occurs through capital investment in new economic opportunities from both public and private entities. The nature of the resulting growth (i.e., the location, size and type of the development) is also typically the result of numerous factors including local government planning, availability of public services, natural resources, economic conditions as well as local political and environmental concerns. Consequently, these factors can have an important role in determining the extent of a project's potential growth-inducing impacts.

Typically, the growth-inducing potential of a project would be considered significant if it stimulates human population growth or a population concentration above what is assumed in local and regional land use plans, or in projections

made by regional planning authorities. Significant growth potential could also occur if the project provides infrastructure or service capacity to accommodate growth levels beyond those permitted by local or regional plans and policies. As discussed below, this analysis evaluates whether the proposed project would directly or indirectly induce economic, population, or housing growth in the surrounding environment.

5.1.1 Direct Growth Inducing Impacts to the Surrounding Environment

The proposed project would amend the Clairemont Mesa Community Plan and rezone the project site to allow for a future residential development on the project site, with a maximum of 404 units. While the future development could propose a reduced number of units, for the purposes of CEQA the following analysis evaluates the conservative scenario of full buildout allowed under the proposed amendments to the Community Plan and zone change.

The potential for growth inducement can be measured through the evaluation of the proposed project's consistency with regional growth projections. As described in Section 3.4, Land Use, and Section 3.5, Population and Housing, of this EIR, San Diego Association of Governments (SANDAG) policies concerning regional growth inducement anticipate growth in the Clairemont Mesa community. As analyzed in Section 3.5, Population and Housing, the population growth in the community of Clairemont Mesa is forecasted to increase by 16.5 percent from 81,498 residents in 2020 to 94,965 residents in 2050 (SANDAG 2013). Using the Clairemont Mesa community's average multi-family person per household of 2.05 people, and a maximum buildout of 404 units, the project has the potential to generate an additional 829 people in the Clairemont Mesa community, which would represent 6.2 percent of 13,467 future residents anticipated in Clairemont Mesa. Therefore, the community planned for and could accommodate the anticipated increases in population and housing associated with the proposed project.

Further, a project could directly induce growth if it would remove barriers to population growth, such as a change to a jurisdiction's general plan and/or zoning ordinance that allows new residential development to occur. The proposed project seeks to amend the Clairemont Mesa Community Plan as well as rezone the project site to allow for the development of up to 404 new residential units. The existing land use designation for the project site, as detailed in Chapter 1.0, Project Description, of this EIR, is Commercial Office (CO-1-2). The CO zone permits employment uses, with limited complementary retail uses and residential uses as specified and is intended to apply in large-scale activity centers or in specialized areas where a full range of commercial activities is not desirable (San Diego Municipal Code [SDMC] Section 131.0504). The CO-1-2 zone is intended to accommodate a mix of office and residential uses that serve

as an employment center and permits a maximum density of one dwelling unit for each 1,500 square feet (SF) of lot area. Under the proposed project, the site would be re-designated to Residential-High (45-73 du/ac) and rezoned as Residential – Multiple Units (RM-3-9). The Community Plan Implementation Overlay Zone (CPIOZ) Type A (CPIOZ-A) supplemental development regulations would be consistent with the general intent of the RM-3-9 zone as modified by the regulations contained in Appendix B.

In order to support the proposed 404 residential units proposed for the future development, maintenance personnel and property management staff would be needed during operation of the future development. However, such use would generate a relatively small number of employees and would not support a large employment staff. In addition, it is anticipated that the majority of the employees would be drawn from within the region's existing employment base and would not require new workers to move to the project area. Therefore, the proposed project would not draw new residents to the area looking for new employment opportunities and as such, would not induce unplanned population growth.

Other employment opportunities resulting from the purposed project would include employment of temporary construction workers during demolition and site preparation and during construction of the future development. In addition, maintenance personnel and property management staff would be needed during project operation. Many of these employees are already present in the region and living in San Diego, and the proposed project would not need to recruit substantial numbers of new employees living elsewhere to the region. Demolition and construction of the proposed project would not cause unplanned population growth as the workforce already exists in the region. In addition, the proposed project is located in an urbanized area and is adequately served by the existing infrastructure.

5.1.2 Indirect Growth Inducing Impacts to the Surrounding Environment

A project would indirectly induce growth if it would increase the capacity of infrastructure in an area in which the public service currently meets demand. Examples include increasing the capacity of local utilities or proposing roadway improvements beyond those needed to meet existing demand.

The proposed project could potentially induce indirect population growth through the creation of jobs and increased residential opportunities. However, as described above and in Section 3.5, Population and Housing, this growth is consistent with SANDAG's projections for local and regional growth. As described within Section 2.4, Traffic and Transportation, and Section 3.8, Utilities and Service Systems, the proposed project would not increase the city's infrastructure to service the proposed project nor would it include roadway improvements. Furthermore, the proposed project would not result in a need for

new public facilities or utilities, as discussed in Section 3.6, Public Services and Section 3.8, Utilities and Service Systems. Police and fire protection services, parks, water infrastructure, and wastewater systems are all sufficient to serve the project site and would not necessitate expansions or improvements that would remove barriers to additional future growth. Therefore, the proposed project would not result in substantial indirect growth inducement.

5.2 Environmental Effects Found Not to Be Significant

CEQA Guidelines Section 15128 requires an EIR to "contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and therefore were not discussed in detail in the EIR." This section discusses those issue areas that were determined not to be significant.

5.2.1 Agricultural and Forestry Resources

According to the California Department of Conservation's San Diego County Important Farmland map, the project site is classified as "Urban and Built-Up Land," which does not contain any agricultural uses or areas designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (California Department of Conservation 2016). Additionally, according to the City of San Diego's General Plan and SDMC, the project site is not designated as forest land (City of San Diego 2015, City of San Diego 2019). Therefore, the proposed project would not convert farmland to a non-agricultural use, and no impact to agricultural resources would occur.

5.2.2 Biological Resources

The project site is fully developed and located in the urbanized community of Clairemont Mesa. The project site contains the former San Diego County Regional Crime Lab (Crime Lab) buildings, associated parking, and minimal ornamental landscaping. Due to the developed nature of the project site, it does not support any candidate, sensitive, or special species. The surrounding area is also void of any native habitats, with the closest open space and recreational areas being Tecolote Canyon, approximately one mile east of the project site, and Marian Bear Memorial Park, approximately 1.75 miles north of the project site. Therefore, implementation of the proposed project would not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species or any riparian habitat or other sensitive natural community in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.

Additionally, there are no state or federally protected wetlands within the project vicinity. Therefore, the proposed project would not have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.

The project site does not contain any waterways or state and/or federally protected habitats, and, due to the project site and vicinity's developed nature, does not serve as a wildlife movement corridor. Therefore, the proposed project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.

The project site is not located in an area subject to an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other such plans. Additionally, the proposed project would comply with all applicable policies or ordinance aimed at protecting biological resources. Therefore, the proposed project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, and would not conflict with an applicable biological resources conservation plan.

5.2.3 Cultural Resources

The project site is currently developed with the former Crime Lab buildings, associated parking, and minimal ornamental landscaping. Prior to being used as the Crime Lab, the existing buildings were constructed as the Clairemont General Hospital in 1961 (Ninyo & Moore 2019). Since the existing buildings are over 50 years old, the structures on the project site have the potential to be considered a historical resource if they meet any of the criteria listed in section 15064.5 of the CEQA Guidelines. In accordance with Section 15064.5 of the CEQA Guidelines, a resource generally shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources (Pub. Res. Code Section 5024.1, Title 14 CCR, Section 4852) including the following:

A. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
B. Is associated with the lives of persons important in our past;
C. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
D. Has yielded, or may be likely to yield, information important in prehistory or history.

While the buildings were used as the Clairemont General Hospital and the Crime Lab, the buildings are not associated with events that significantly contributed to the history of California or the local area. Furthermore, the buildings themselves do not provide context or information for a particular time period as the buildings have an architecture style of a generic office building, which lacks artistic value and is consistent with surrounding office buildings. Therefore, the existing buildings would not meet Criterion A or D. The buildings are currently one- to two-story structures with limited architectural design features and have a visual character that is similar to other office buildings in the area. Furthermore, the buildings do not portray a specific design aesthetic that is of a particular time period and is not associated with the lives of historically important persons, such as a prominent architecture. Therefore, the existing buildings do not meet Criterion B or C. Because the existing buildings would not meet any of the criteria listed above, the buildings would not be eligible for designation as a historical resource. Therefore, demolition of the existing buildings would not cause an adverse effect to a historical resource.

Additionally, implementation of the proposed project would allow for the development of a future development, through the CPA and rezone, and the demolition of the existing unoccupied buildings and related facilities on-site. Site preparation activities would involve ground-disturbing activities, which have the potential to encounter unknown buried historic and archaeological resources. The project area is underlain by Chesterton-Urban land complex soil type, which is primarily composed of sandy loam and artificial fill materials (USDA 2019). Because of the underlying soil type and the previous disturbance conducted on the site during prior development activities, the likelihood of encountering archaeological resources or human remains during project implementation is considered to be very low. However, there is a possibility, though extremely slight, that human remains could be encountered during ground-disturbing activities. Regardless, if human remains were identified, provisions of PRC Section 5097.98 would apply, whereby the San Diego County Coroner would be contacted, as well as provisions of Health and Safety Code Section 7050.5, which require that, if the remains are determined to be Native American, the County Coroner would notify the Native American Heritage Commission (NAHC) in accordance with Health and Safety Code Section 7050.5, subdivision (c), and PRC Section 5097.98 (as amended by Assembly Bill 2641). The NAHC would designate a Most Likely Descendant for the remains per PRC Section 5097.98. Because the likelihood of encountering human remains is extremely low, and because any such discovery would be covered under existing state law, the potential impact to human remains would be less than significant.

5.2.4 Geology, Soils, and Seismicity

Similar to all of southern California, the project site is in a known seismically active region where the potential of seismic hazards exists. According to the California Department of Conservation's Map Data Viewer, the project site is not located on an Alquist-Priolo Earthquake Fault Zone (California Department of Conservation 2019). The nearest Alquist-Priolo Fault is the Rose Canyon Fault, which is located approximately 2.3 miles west of the project site. Therefore, there is not a risk of fault rupture of a known Alquist-Priolo fault on the project site.

Additionally, all of San Diego County, including the project site, is located within Seismic Zone 4 (Section 1629.4.1 of the California Building Code [CBC]), which is the highest seismic zone, and is subject to ground shaking. A seismic event on the Rose Canyon Fault could cause significant ground shaking on the project site. Construction of the future development would be required to comply with all applicable seismic-safety development requirements. Therefore, conformance with development standards during construction of the future development would minimize seismic ground shaking effects in the event of a major earthquake and ensure that the potential seismic or geologic hazard impacts are not significant.

The entire project site has been previously graded and disturbed during construction of the existing buildings. The project site is underlain by Chesterton-Urban land complex soil type, which is primarily composed of sandy loam and fill materials (USDA 2019). Construction activities would include ground disturbance, however, given the shallow depth of earthwork required and the site's relatively level topography, rapid storm water runoff would be limited, and would not exacerbate erosion potential. Furthermore, all construction activities, including site demolition and preparation and construction of the future development, would comply with applicable erosion-control regulations, such as the National Pollution Discharge Elimination System, which would require site-specific measures to minimize erosion off-site. Therefore, impacts related to soil erosion would be less than significant.

According to the City's General Plan, the project site is designated as having a nominal to low risk for geologic hazards, including liquefaction (City of San Diego 2008a). Additionally, the project site is relatively flat with no surrounding slopes and as such, there is no potential for landslides onsite. As such, the proposed project would not cause potentially substantial adverse effects related to liquefaction or landslides, and impacts would be less than significant.

Expansive soils are fine-grained soils (generally high-plasticity clays) that can undergo a significant increase in volume with an increase in water content and a significant decrease in volume with a decrease in water content. Changes in the water content of an expansive soil can result in severe distress to structures constructed upon the soil. As mentioned above, the project site is underlain by

Chesterton-Urban land complex soil type, which is primarily composed of sandy loam and fill materials (USDA 2019). Based on the underlying soil types, the project site generally has a very low to low expansion potential, and liquefaction is unlikely to occur on site. Therefore, impacts associated with expansive soils would be less than significant.

Paleontological resources (fossils) are the remains and/or traces of prehistoric plant and animal life exclusive to human remains or artifacts. Fossil remains such as bones, teeth, shells, and wood are found in the geologic deposits (rock formations) in which they were originally buried. According to the City's General Plan EIR, the Clairemont Mesa community is located on the Scripps Formation and Ardath Shale Formation, both which have high paleontological resource sensitivity (City of San Diego 2007). Construction activities would include ground-disturbing activities~~, however, the depth of grading is anticipated to be relatively limited as only sheet grading for drainage purposes would be required~~. Should the proposed project involve 1,000 cubic yards or greater, and 10 feet or greater excavation in depth, regulations associated with the City's grading ordinance would be required, including paleontological monitoring. In addition, because of the previous disturbance conducted on the site during prior development activities, the likelihood of encountering fossils during project implementation is considered to be low. Therefore, impacts related to paleontological resources would be considered less than significant.

5.2.5 Hydrology

Implementation of the proposed project would include the demolition of the existing unoccupied buildings and related facilities on-site, and allow for the construction of a future development. Other site preparation activities would include the disposal of the demolition debris, and limited grading of the site in preparation for future development. During demolition and site preparation activities and during construction of the future development, exposed soil could temporarily increase the amount of sediment in runoff, which would enter the existing storm drain system. The proposed project would be required to obtain and comply with the Construction General Permit from the State Water Resources Control Board (SWRCB). In addition, the proposed project would be required to conform to applicable provisions of the City's Jurisdictional Runoff Management Plan, Storm Water Standards, Drainage Design Manual, and Storm Water Management and Discharge Control Ordinance. Stormwater best management practices (BMPs) would be required to limit erosion, minimize sedimentation, and control stormwater runoff water quality during construction activities. ~~It is assumed that~~ Due to the limits of disturbance being larger than one acre, ~~for~~ the proposed project would require a Stormwater Pollution Prevention Plan (SWPPP). The project site drains to Tecolote Creek and Mission Bay and is part of the Mission Bay Watershed Management Area subject to the Mission Bay

Water Quality Improvement Plan (WQIP). Compliance under the Construction General Permit and SWPPP would ensure that construction activities would not degrade the surface water quality of receiving waters to levels that would be below the standards that are considered acceptable by the San Diego Regional Water Quality Control Board (RWQCB) or other regulatory agencies. In addition, compliance with existing regulations would prevent erosion, sedimentation, and an increase of runoff from entering the existing drainage infrastructure.

Upon completion of construction of the future development, the project site would be developed and landscaped, where any additional BMPs would be incorporated to minimize discharge of pollutants into the existing municipal storm drain system. The amount of stormwater runoff, and surface or ground water quality from the project site would not change substantially from existing conditions after construction of the future development. Therefore, the proposed project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Impacts would be less than significant.

The proposed project would allow for the construction of a future development within an existing site that is currently developed. After the completion of construction of the future development, the amount of impervious surfaces onsite would remain similar to the existing conditions, and ground surface would be restored similar to existing conditions. Drainage within the project site would continue to be serviced by the existing storm drain system. Additionally, no stream or river courses exist within the site vicinity that could be affected by the proposed project. In addition, the project site is not located within a Federal Emergency Management Agency (FEMA) designated 100-year floodplain or floodway. Therefore, impacts on the existing drainage pattern regarding siltation or erosion and surface runoff on- or off-site would be less than significant.

5.2.6 Land Use and Planning

The project's potential for significant land use impacts related to Issues 1 through 6 (consistency with adopted land use designations, conflict with local plans, and construction in a flood hazard area) are addressed in Section 3.4, Land Use and Planning. The following discussion is focused on those land use effects of the proposed project that have no potential for a significant impact.

The proposed project would allow for the construction of a future development on the project site. The project site is surrounded by existing residential and commercial land uses and currently developed with existing buildings. Development enabled by the project would be built on a parcel where urban land development is already allowed and would connect with the surrounding parcels and land uses. Furthermore, no additional roadways or other linear features would be constructed as part of the project. Therefore, the development enabled

by the project would not physically divide an established community and no impact would occur.

5.2.7 Mineral Resources

According to the Conservation Element of the City's General Plan, the project site is located in an area designated as a mineral resource zone (MRZ-) 3 (City of San Diego 2008b). MRZ-3 areas are considered areas containing mineral deposits, the significance of which cannot be evaluated from available data. While the site is classified MRZ-3, the project site is not currently designated for mineral extraction or for future mineral extraction activities and is not suitable for mineral extraction as it is located in an urban, developed setting. Therefore, implementation of the project would not result in the loss of available mineral resources or a locally-important mineral resource recovery site, and no impact would occur.

5.2.8 Population and Housing

The project's potential for significant population and housing impacts related to Issue 1 (substantial unplanned population growth**)** is addressed in Section 3.5, Population and Housing. The following discussion is focused on those population and housing effects of the proposed project that have no potential for a significant impact.

The project site is currently developed with existing buildings that were formerly used as the Crime Lab, which did not support residential use. Therefore, the proposed project would not displace people or require replacement housing elsewhere. Furthermore, the project would allow for the development of up to 404 additional residential units in the City. Therefore, no impact would occur regarding the displacement of existing people or housing, necessitating the construction of replacement housing elsewhere.

5.2.9 Tribal Cultural Resources

The County, as lead agency, initiated tribal consultation in accordance with Assembly Bill (AB) 52 and Senate Bill (SB) 18 for the proposed project (Appendix J). Consultation was initiated on September 28, 2018 and concluded on December 28, 2018. No tribes have requested consultation with the County for the project. Implementation of the proposed project would include the demolition of the existing unoccupied buildings and related facilities on-site, and allow for construction a future development. Other site preparation activities would include the disposal of the demolition debris, and mass grading of the site in preparation for residential construction. Site preparation activities would involve ground-disturbing activities, which have the potential to encounter unknown buried archaeological resources. However, since the project site has been previously

graded, ground-disturbing activities associated with the project is expected to encounter artificial fill and is not anticipated to reach native soils. Furthermore, the depth of grading is anticipated to be relatively limited as only sheet grading for drainage purposes would be required. As such, the project area would have an extremely low potential for the presence of archaeological resources, which could be considered tribal cultural resources. Therefore, the proposed project would have no impact on tribal cultural resources.

5.2.10 Wildfire

The project site is located in an urban, developed setting where the majority of vegetation in the area consists of ornamental landscaping. The project site is relatively flat with no surrounding slopes and is bounded by residential and commercial land uses and roadways. While the nearest wildland area is located approximately 0.75-miles to the west of the project site, the area between the project site and the wildland area is fully developed with no substantial vegetation areas which could aid in the spread of wildfire. Therefore, the potential for a wildland fire to occur at the project site is considered to be very low. In addition, the project would be designed to comply with all development standards regarding fire prevention, protection, and management features established by the City to further minimize the risk of wildland fire. For these reasons, the project would not expose people to an increase risk of wildfire, would not impair an adopted wildfire emergency response plan, and would not require any additional fire protection features above those required by law. Therefore, the project would have no impact on wildfire.

5.3 Significant Irreversible Environmental Changes

Section 21100(b)(2)(B) of the CEQA Statutes and Section 15126.2(c) of the CEQA Guidelines require that an EIR analyze the extent to which the proposed project's primary and secondary effects would impact the environment and commit nonrenewable resources to uses that future generations would not be able to reverse. "Significant irreversible environmental changes" include the use of nonrenewable natural resources during the initial and continued phases of the project, should this use result in the unavailability of these resources in the future. Primary impacts and, particularly, secondary impacts generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with projects. Irretrievable commitments of these resources are required to be evaluated in an EIR to ensure that such consumption is justified.

Approval of the proposed project would cause irreversible environmental changes consisting of the following:

- Commitment of land that will involve a large commitment of nonrenewable resources: The relatively small commitment of land to these uses, which is already developed with the Crime Lab buildings, is considered less than significant when compared to other development in a local and regional context and the surrounding urban built environment.
- Increased requirements of public services and utilities which represent a permanent commitment of these resources: There would be an adequate supply of water and wastewater resources to supply the proposed project and the ability to provide fire protection, police protection, and solid waste services (see Section 3.6, Public Services, and 3.8, Utilities and Service Systems).
- Use of various nonrenewable natural resources such as diesel, gasoline, or oil for construction equipment and natural gas or other fossil fuels used to provide power and heating sources: The energy consumed in development and maintaining the project site may be considered a permanent investment. The proposed project would not use nonrenewable fossil fuels at a greater rate than other typical construction projects. If the proposed project were not to occur, similar resources would likely be used per the project site's existing land use. The proposed project would not increase the overall rate of any nonrenewable natural resource or result in the substantial depletion of any nonrenewable resource.
- Use of various renewable natural resources, such as water, lumber, and soil, for construction and operations: The proposed project is a relatively minor consumer of these supplies when compared to other local and regional users. The proposed project would not increase the overall rate of use of any renewable natural resource or result in the substantial depletion of any renewable resource.

5.4 Significant and Unavoidable Impacts

CEQA Guidelines Section 15126.2(c) requires that an EIR describe any significant impacts that cannot be avoided, including those impacts that can be mitigated but not reduced to a less-than-significant level. Chapter 2.0 of this EIR describes the potential environmental impacts of the proposed project and recommends mitigation measures to reduce impacts, where feasible. Potentially significant impacts are identified in the areas of air quality, hazards and hazardous materials, noise, and transportation. However, except for transportation, these potentially significant impacts would be mitigated to below a level of significance with implementation of mitigation measures identified in this EIR. As discussed in detail in Section 2.4, Transportation and Traffic, the project would result in significant and unavoidable impacts.

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CHAPTER 7.0 LIST OF MITIGATION MEASURES

This section consists of **Table 7-1**, which is a comprehensive listing of all mitigation measures proposed for the project and all project design considerations that were relied upon to reduce impacts. This list is divided into sections according to the subchapter and impact number.

Table 7-1
Mitigation Measures

Impact Number	Mitigation Measure	Mitigation Measure Description
Air Quality		
AIR-1	AIR-1	**Construction Equipment:** The project shall require all off-road diesel equipment greater than 50 horsepower (hp) used during construction activities to meet USEPA Tier 4 final off-road emission standards or equivalent. Such equipment shall be outfitted with Best Available Control Technology (BACT) devices including a CARB-certified Level 3 Diesel Particulate Filter or equivalent.
Hazards and Hazardous Materials		
HAZ-1	HAZ-1	**Soil Contamination, Lead, and Asbestos Recommendations:** During demolition of the existing buildings, site preparation for the future development, and construction of the future development, the construction contractor shall ~~follow~~ implement the findings and recommendations of the Phase I ESA, including: • ~~In future development of the project site, preparation and implementation of a~~ A soil management plan shall be prepared by a qualified specialist and implemented ~~used~~ during project construction activities near areas of known contamination~~. Where contamination is known or suspected, and~~ or where grading or other soil disturbance activities could encounter contaminated media, undocumented USTs, or other unknown contamination or hazards.~~, implementation of a~~ The soil management plan ~~provides~~ shall contain protocols to address site-specific ~~hazardous~~ conditions~~, if encountered,~~ in ~~accordance~~ compliance with local, state, and federal regulations. • Soil sampling shall be performed at the time of ~~the~~ UST removal to evaluate whether an unauthorized release has occurred. If contaminated soil is identified, protocols in the soil management plan shall be implemented in compliance with local, state, and federal regulations. • A worker health and safety plan shall be prepared and implemented during construction near areas of known contamination.

Impact Number	Mitigation Measure	Mitigation Measure Description
		• ~~A~~ The extent of asbestos-containing materials and lead-based paint shall be ~~evaluated~~ determined through appropriate testing techniques prior to ~~razing of the site~~ building demolition. Proper protocols for the removal of asbestos-containing materials and lead-based paint shall be followed in compliance with local, state, and federal regulations.
HAZ-2	HAZ-2	**Traffic Control Plan:** Prior to the start of construction of the future development, the construction contractor shall prepare a Traffic Control Plan satisfactory to the City Engineer. The Traffic Control Plan shall show all signage, striping, delineated detours, flagging operations, and any other devices that will be used during construction to guide motorists, pedestrians, and bicyclists through the construction area and allow for adequate access and circulation to the satisfaction of the City Engineer. The Traffic Control Plan shall be prepared in accordance with the City's traffic control guidelines and shall be prepared to ensure that emergency access will be continuously provided.
HAZ-3	HAZ-1	Refer to Mitigation Measures HAZ-1 and HAZ-2 above.
Noise and Vibration		
NOI-1	NOI-1	**Construction Noise.** The following construction noise abatement techniques shall be implemented by the construction contractor to reduce construction-related noise to less than a 10 dBA increase in existing ambient noise levels at nearby noise-sensitive receivers: • Temporary noise barriers shall be placed to block the line-of-sight between construction equipment operation and the residential land uses in proximity to the proposed project's property line to the north and west. One of the following two options shall be implemented by the construction contractor: a. A temporary noise barrier shall be placed along the entire western property line of the project site and approximately 50 feet to the north from the northwestern corner at a height of 14 feet with noise blankets capable of achieving sound level reductions of at least 8 dBA to block the line-of-sight between construction equipment operations and the offsite noise-sensitive receivers to the south and southwest; or b. A temporary 50-by-50-foot "L-shaped" noise barrier shall be constructed for each small construction area at a height of 14 feet with noise blankets capable of achieving sound level reductions of at least 8 dBA to block the line-of-

Impact Number	Mitigation Measure	Mitigation Measure Description
		sight between construction equipment operations and the offsite noise-sensitive receivers.
Transportation and Traffic		
TRA-1 (Existing Plus Project)	TRA-1	**Mount Everest Boulevard & Balboa Avenue Intersection Modifications (Access Options 1 and 3)** Prior to issuance of the first building permit, Owner/Permittee shall assure by permit and bond the restriping of the northbound and southbound approaches on Mount Everest Boulevard to provide an exclusive left-turn lane and a shared through-right turn lane, then convert the northbound and southbound approaches from split phasing to protected left-turn phasing, satisfactory to the City Engineer. Improvements shall be completed and operational prior to first occupancy.
	TRA-2	**Genesee Avenue & Balboa Avenue Intersection Modifications (Access Option 3)** Prior to issuance of the first building permit, Owner/Permittee shall assure by permit and bond the ~~optimization of signal timing or~~ installation of traffic systems management (TSM) strategies (e.g., adaptive signal technology) to maximize efficiency of the existing roadway through improved signal communications and operations satisfactory to the City Engineer. Improvements shall be completed and operational prior to first occupancy.
	TRA-3	**Cannington Drive & Balboa Avenue Intersection Modifications (All Access Options)** Prior to issuance of the first building permit, Owner/Permittee shall assure by permit and bond the installation of traffic systems management (TSM) strategies (e.g., adaptive signal technology) to maximize efficiency of the existing roadway through improved signal communications and operations satisfactory to the City Engineer. Improvements shall be completed and operational prior to first occupancy.
TRA-2 (Near-Term Plus Project)	TRA-1 through TRA-~~2~~3	Refer to Mitigation Measures TRA-1 ~~and~~ through TRA-~~2~~3 above.
	TRA-~~3~~4	**Charger Boulevard & Balboa Avenue Intersection Modifications (~~a~~All ~~a~~Access ~~o~~Options)** Prior to issuance of the first building permit, Owner/Permittee shall assure by permit and bond the restriping of the northbound shared through-left turn lane into an exclusive through lane and convert the northbound and southbound signal from split phasing to protective phasing and the installation of traffic systems management (TSM) strategies (e.g., adaptive signal technology) to maximize efficiency of the existing roadway through improved signal communications and operations, satisfactory to the City

Impact Number	Mitigation Measure	Mitigation Measure Description
		Engineer. Improvements shall be completed and operational prior to first occupancy.
TRA-3 (Cumulative Plus Project)	TRA-1 through TRA-~~3~~4	Refer to Mitigation Measures TRA-1 ~~and~~ through TRA-~~3~~4 above.
	TRA-~~4~~5	**Genesee Avenue & Clairemont Mesa Boulevard Adaptive Signal Control System (All Access Options)** Prior to issuance of the first building permit, Owner/Permittee shall pay its fair share (5.0 percent) toward ~~optimizing signal timing or~~ the cost of installing traffic systems management (TSM) strategies (e.g. adaptive signal technology) to maximize efficiency of the existing roadway through improved signal communications and operations, satisfactory to the City Engineer.
	TRA-~~5~~6	**Clairemont Drive & Balboa Avenue Adaptive Signal Control System (All Access Options)** Prior to issuance of the first building permit, Owner/Permittee shall pay its fair share (4.3 percent) toward ~~optimizing signal timing or~~ installing traffic systems management (TSM) strategies (e.g. adaptive signal technology) to maximize efficiency of the existing roadway through improved signal communications and operations, satisfactory to the City Engineer.

CHAPTER 8.0 LIST OF REFERENCES

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