THE CITY OF SAN DIEGO

TIERED MITIGATED NEGATIVE DECLARATION

Project No. 686158
SCH No. 2019060003

SUBJECT: **Scripps Health NDP**: A NEIGHBORHOOD DEVELOPMENT PERMIT to allow demolition of the existing three one-level structures totaling 30,221-square-foot San Diego Braille Institute buildings and associated existing hardscape and landscape areas and construction of an approximately 131,183-square-foot, five-level office building with a surface parking lot and a stand-alone four-level above-grade parking structure. The 131,183-square-foot building would be used as a corporate headquarters/single tenant office building, with an approximately 25,522-square-foot basement. The stand-alone four-level parking structure would be approximately 131,509 square feet. The project is located at 4555 Executive Drive on the southeast corner of Executive Drive and Executive Way. The 3.79-acre project site is designated as Industrial-Scientific Research within the University Community Plan, and zoned Industrial Park (IP-1-1) in the Nexus Technology Centre Specific Plan. Additionally, the project site is located within the Airport Land Use Compatibility Overlay Zone (Marine Corps Air Station [MCAS] Miramar), Airport Influence Area (MCAS Miramar Review Area 1 and Area 2), Airport Land Use Compatibility Plan Noise Contours (60 to 65 community noise equivalent level), Federal Aviation Administration Part 77 Notification Area (MCAS Miramar), Community Plan Implementation Overlay Zone – Type A, Prime Industrial Lands, and Parking Impact Overlay Zone. (LEGAL DESCRIPTION: PM 15872 BLOCK No. LOT No. PAR 1 PARCEL MAP PM 15872 BLOCK No. PAR 2 PARCEL MAP.) APPLICANT: Alexandria Real Estate.

I. PROJECT DESCRIPTION:

See attached Tiered Initial Study.

II. ENVIRONMENTAL SETTING:

See attached Tiered Initial Study.

III. DOCUMENTATION:

The attached Tiered Initial Study documents the reasons to support the above Determination.

IV. MITIGATION, MONITORING AND REPORTING PROGRAM:

A. GENERAL REQUIREMENTS: PART I – Plan Check Phase (prior to permit issuance)

1. Prior to the issuance of a Notice To Proceed (NTP) for a subdivision, or any construction permits, such as Demolition, Grading or Building, or beginning any construction related activity on-site, the Development Services Department (DSD) Director's Environmental Designee (ED) shall review and approve all Construction Documents (CD), (plans, specification, details, etc.) to ensure the MMRP requirements are incorporated into the design.

2. In addition, the ED shall verify that the MMRP Conditions/Notes that apply ONLY to the construction phases of this project are included VERBATIM, under the heading, "ENVIRONMENTAL/MITIGATION REQUIREMENTS."

3. These notes must be shown within the first three (3) sheets of the construction documents in the format specified for engineering construction document templates as shown on the City website: http://www.sandiego.gov/development-services/industry/standtemp.shtml

4. The **TITLE INDEX SHEET** must also show on which pages the "Environmental/Mitigation Requirements" notes are provided.

5. **SURETY AND COST RECOVERY –** The Development Services Director or City Manager may require appropriate surety instruments or bonds from private Permit Holders to ensure the long-term performance or implementation of required mitigation measures or programs. The City is authorized to recover its cost to offset the salary, overhead, and expenses for City personnel and programs to monitor qualifying projects.

B. GENERAL REQUIREMENTS: PART II – Post Plan Check (After permit issuance/Prior to start of construction)

1. PRECONSTRUCTION MEETING IS REQUIRED TEN (10) WORKING DAYS PRIOR TO BEGINNING ANY WORK ON THIS PROJECT. The PERMIT HOLDER/OWNER is responsible to arrange and perform this meeting by contacting the CITY RESIDENT ENGINEER (RE) of the Field Engineering Division and City staff from MITIGATION MONITORING COORDINATION (MMC). Attendees must also include the Permit holder's Representative(s), Job Site Superintendent and the following consultants: ***Qualified Biologist and Acoustician***

   Note: Failure of all responsible Permit Holder's representatives and consultants to attend shall require an additional meeting with all parties present.

   CONTACT INFORMATION:

a) The PRIMARY POINT OF CONTACT is the RE at the Field Engineering Division, 858-627-3200.

b) For Clarification of ENVIRONMENTAL REQUIREMENTS, it is also required to call RE and MMC at 858-627-3360.

2. **MMRP COMPLIANCE:** This Project, Project Tracking System (PTS) No. 671912 and/or Environmental Document No. 671912, shall conform to the mitigation requirements contained in the associated Environmental Document and implemented to the satisfaction of the DSD's Environmental Designee (MMC) and the City Engineer (RE). The requirements may not be reduced or changed but may be annotated (i.e. to explain when and how compliance is being met and location of verifying proof, etc.). Additional clarifying information may also be added to other relevant plan sheets and/or specifications as appropriate (i.e., specific locations, times of monitoring, methodology, etc.

   Note: Permit Holder's Representatives must alert RE and MMC if there are any discrepancies in the plans or notes, or any changes due to field conditions. All conflicts must be approved by RE and MMC BEFORE the work is performed.

3. **OTHER AGENCY REQUIREMENTS:** Evidence of compliance with all other agency requirements or permits shall be submitted to the RE and MMC for review and acceptance prior to the beginning of work or within one week of the Permit Holder obtaining documentation of those permits or requirements. Evidence shall include copies of permits, letters of resolution or other documentation issued by the responsible agency: Not Applicable

4. **MONITORING EXHIBITS**: All consultants are required to submit, to RE and MMC, a monitoring exhibit on a 11x17 reduction of the appropriate construction plan, such as site plan, grading, landscape, etc., marked to clearly show the specific areas including the **LIMIT OF WORK**, scope of that discipline's work, and notes indicating when in the construction schedule that work will be performed. When necessary for clarification, a detailed methodology of how the work will be performed shall be included.

   Note: Surety and Cost Recovery – When deemed necessary by the Development Services Director or City Manager, additional surety instruments or bonds from the private Permit Holder may be required to ensure the long-term performance or implementation of required mitigation measures or programs. The City is authorized to recover its cost to offset the salary, overhead, and expenses for City personnel and programs to monitor qualifying projects.

5. **OTHER SUBMITTALS AND INSPECTIONS:** The Permit Holder/Owner's representative shall submit all required documentation, verification letters, and requests for all associated inspections to the RE and MMC for approval per the following schedule:

Document Submittal/Inspection Checklist

Issue Area	Document Submittal	Associated Inspection/Approvals/Notes
General	Consultant Qualification Letters	Prior to Preconstruction Meeting
General	Consultant Construction Monitoring Exhibits	Prior to or at Preconstruction Meeting
Traffic	VMT Assessment Report	VMT Traffic Features Site Observation
Bond Release	Request for Bond Release Letter	Final MMRP Inspections Prior to Bond Release Letter

C. SPECIFIC MMRP ISSUE AREA CONDITIONS/REQUIREMENTS

Transportation

MM-TRA-1 Transportation/Circulation (Vehicle Miles Traveled)

The project shall implement the following VMT Reduction Measures which would achieve 10.5 reduction points required by the Mobility Choices Ordinance. Implementation of these measures would minimize VMT impacts to the extent feasible.

1. Provide an on-site bicycle repair station (1.5 points)

2. Provide carpool parking spaces, at least 10% beyond minimum requirements
   - Carpool parking required = 42 spaces
   - Carpool parking provided = 63 spaces (50% more than required). (7.5 points)

3. Provide short-term bicycle parking spaces that are available to the public, at least 10% beyond minimum requirements.
   - Short-term bicycle parking required = 21 spaces
   - Short-term bicycle parking provided = 24 spaces (1.5 points)

V. PUBLIC REVIEW DISTRIBUTION:

Draft copies or notice of this Tiered Mitigated Negative Declaration were distributed to:

City of San Diego
Mayor's Office (91)
Councilmember LaCava, District 1 (MS 10A)
Development Services Department
- EAS
- Planning Review
- Landscape
- Engineering
- Transportation
- Geology
- Fire-Plan Review
- PUD- Water & Sewer Development
- DPM

Planning Department
- Plan-Facilities Financing

Library Department - Government Documents (81)
Central Library (81A)
University City Community Branch Library (81JJ)
North University Branch Library (81KK)
Environmental Services Department (93A)
Facilities Financing (MS 93B)
City Attorney's Office (93C)

Other Organizations, Groups and Interested Individuals
Clint Linton, Iipay Nation of Santa Ysabel
Lisa Cumper, Jamul Indian Village
University City Community Planning Group (480)
Editor, Guardian (481)
Robert Clossin, UCSD Physical & Community Planning (482)
Commanding General, Community Plans Liaison MCAS Miramar Air Station (484)
Marian Bear Natural Park Recreation Council (485)
University City Community Association (486)
Friends of Rose Canyon (487)
University City Library (488)
Rachel B. Hooper / Deborah L. Keeth, Shute Mihaly & Weinberger LLP (490)
Chamber of Commerce (492)
Richard Drury, Lozeau Drury LLP
Molly Greene, Lozeau Drury LLP
John Stump
Alexandria Real Estate Equities, Inc., Applicant
Nick Larkin, RECON Environmental Inc., Consultant

VI. RESULTS OF PUBLIC REVIEW:

☐ No comments were received during the public input period.

☐ Comments were received but did not address the accuracy or completeness of the draft environmental document. No response is necessary and the letters are incorporated herein.

☐ Comments addressing the accuracy or completeness of the draft environmental document were received during the public input period. The letters and responses are incorporated herein.

Copies of the tiered environmental document and associated project-specific technical appendices, if any, may be accessed on the City of San Diego's California Environmental Quality Act (CEQA) webpage at https://www.sandiego.gov/ceqa.

E Shearer-Nguyen
Program Manager
Development Services Department

June 9, 2022
Date of Draft Report

Date of Final Report

Analyst: M. Dresser

Attachments:
- Initial Study
- List of Acronyms
- Figure 1: Regional Location
- Figure 2: Project Location on Aerial Photograph
- Figure 3: Site Plan

TIERED INITIAL STUDY CHECKLIST

1 INTRODUCTION

1.1 Tiered Initial Study

Pursuant to Section 15063 of the California Environmental Quality Act (CEQA) Guidelines (Title 14, California Code of Regulations, Sections 15000 et seq.), an Initial Study is a preliminary environmental analysis that is used by the lead agency as a basis for determining whether an environmental impact report (EIR), a Tiered Mitigated Negative Declaration, or a Negative Declaration is required for a project. The CEQA Guidelines require that an Initial Study contain a project description, description of environmental setting, identification of environmental effects by checklist or other similar form, explanation of environmental effects, discussion of mitigation for significant environmental effects, evaluation of the project's consistency with existing, applicable land use controls, and the name of persons who prepared the study.

1.2 Tiering Process

This environmental analysis is a Tiered Initial Study for the proposed Scripps Health Headquarters Project (referred to as the "proposed project" or "project" throughout this document). This environmental analysis is tiered from the *Complete Communities: Housing Solutions and Mobility Choices Program EIR* in accordance with Sections 15152 and 15168 of the CEQA Guidelines and Public Resources Code Section 21094. The *Complete Communities: Housing Solutions and Mobility Choices Program EIR* was prepared pursuant to Section 15168 of the CEQA Guidelines.

The Complete Communities: Mobility Choices (Mobility Choices Program) amended the San Diego Municipal Code (SDMC; Chapter 14, Article 3. Division 11) and Land Development Manual to adopt a new CEQA significance threshold for transportation that implements Senate Bill 743 (SB 743), and a program to mitigate vehicle miles traveled (VMT) impacts from new development. The Mobility Choices Program ensures that new development mitigates transportation VMT impacts to the extent feasible.

The CEQA concept of "tiering" refers to the evaluation of general environmental matters in a broad program-level EIR, with subsequent focused environmental documents for individual projects that implement the program. This environmental document incorporates by reference the discussions in the *Complete Communities: Housing Solutions and Mobility Choices Program EIR* and concentrates on project-specific issues. CEQA and the CEQA Guidelines encourage the use of tiered environmental documents to reduce delays and excessive paperwork in the environmental review process. This is accomplished in tiered documents by eliminating repetitive analyses of issues that were adequately addressed in the Program EIR and by incorporating those analyses by reference.

Section 15168(d) of the State CEQA Guidelines provides for simplifying the preparation of environmental documents on individual parts of the program by incorporating by reference analyses and discussions that apply to the program as a whole. Where an EIR has been prepared or certified for a program or plan, the environmental review for a later activity consistent with the program or plan should be limited to effects that were not analyzed as significant in the prior EIR or that are susceptible to substantial reduction or avoidance (CEQA Guidelines Section 15152[d]).

1.3 Appropriateness of a Tiered Initial Study

The proposed project would be consistent with the scope of the program as described in the *Complete Communities: Housing Solutions and Mobility Choices Program EIR*. Accordingly, pursuant to Section 15152 of the State CEQA Guidelines, it is appropriate to tier this Initial Study from the *Complete Communities: Housing Solutions and Mobility Choices Program EIR*. This Tiered Initial Study evaluates whether the environmental effects of the proposed project were adequately addressed in the *Complete: Housing Solutions and Mobility Choices Program EIR*. For impacts that were adequately addressed, the Tiered Initial Study provides a cross reference to the relevant discussion in the *Complete Communities: Housing Solutions and Mobility Choices Program EIR*. Project-specific impacts that were not addressed in the *Complete Communities: Housing Solutions and Mobility Choices Program EIR*, are evaluated in detail in this Document. Project specific mitigation has been identified where required.

2 PROJECT INFORMATION

2.1 Project title/Project number: Scripps Health Headquarters Project / 686158

2.2 Lead agency name and address: City of San Diego, 1222 First Avenue, MS-501, San Diego, California 92101

2.3 Contact person and phone number: M. Dresser / (619) 446-5369

2.4 Project location: 4555 Executive Drive, San Diego, CA 92121

2.5 Project Applicant/Sponsor's name and address: Alexandria Real Estate Equities, Inc., 10996 Torreyana Road, Suite 250, San Diego, CA 92121

2.6 General/Community Plan designation: General Plan: Industrial Employment. University Community Plan: Industrial-Scientific Research

2.7 Zoning: Industrial Park (IP-1-1-1) (With Specific Plan; Nexus Technology Centre Specific Plan)

2.8 Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement): N/A

3 PROJECT DESCRIPTION

3.1 Environmental setting and surrounding land uses:

The Scripps Health Headquarters Project (project) is located at 4555 Executive Drive on the southeast corner of Executive Drive and Executive Way (Assessor's Parcel Numbers 345-012-04-00 and 345-012-05-00). The project site is located west of Interstate 805 and east of Interstate 5, in the University community of the city of San Diego, California (Figure 1). The 3.79-acre project site is currently developed as the San Diego Braille Institute, which consists of three one-level structures, asphalt concrete parking areas, and landscaping. Access to the project site is provided via Executive Drive and Executive Way (Figure 2).

The project site is designated as Industrial-Scientific Research within the University Community Plan, and zoned Industrial Park (IP-1-1) in the Nexus Technology Centre Specific Plan. Additionally, the project site is located within the Airport Land Use Compatibility Overlay Zone (Marine Corps Air Station [MCAS] Miramar), Airport Influence Area (MCAS Miramar Review Area 1 and Area 2), Airport Land Use Compatibility Plan Noise Contours (60 to 65 Community Noise Equivalent Level [CNEL]), Federal Aviation Administration (FAA) Part 77 Notification Area (MCAS Miramar), Community Plan Implementation Overlay Zone – Type A, Prime Industrial Lands, and Parking Impact Overlay Zone.

The project site is surrounded by residential development to the east, an Embassy Suites Hotel and commercial development to the south, and commercial development to the west and north. Surrounding land use designations as identified on the University Community Plan Land Use Map consists of Commercial and Residential. Additionally, the project site is located in an urbanized area currently served by existing public services and utilities.

3.2 Description of project (Describe the whole action involved, including but not limited to, later phases of the project, and any secondary, support, or off-site features necessary for its implementation.):

The project is a request for a NEIGHBORHOOD DEVELOPMENT PERMIT (NDP) to allow demolition of the existing 30,221-square-foot San Diego Braille Institute buildings and associated existing hardscape and landscape areas and construction of an approximately 131,183-square-foot, five-level office building with a surface parking lot and a stand-alone four-level above-grade parking structure. The 131,183-square-foot building would be used as a corporate headquarters/single tenant office building, with an approximately 25,522-square-foot basement. The stand-alone four-level parking structure would be approximately 131,509 square feet.

The project would provide a total of 525 parking spaces, which would consist of 406 spaces within the proposed parking garage, 86 surface parking spaces, and 33 subgrade parking spaces beneath the proposed office building. Of the 525 total parking spaces, the project would provide 13 American with Disabilities Act (ADA) compliant parking spaces, ten of which would be standard parking spaces, and three would be van parking spaces. Of the 525 total parking spaces, the project would provide 63 clean air parking spaces. Of the 525 total parking spaces, the project would provide 53 electrical vehicle parking spaces, 26 of which would be provided with charging equipment installed ready for use. The project would

also provide 12 motorcycle parking spaces, which would exceed the City Municipal Code requirement of nine motorcycle spaces, 24 short-term bicycle spaces and 27 long-term bicycle spaces.

The project is requesting allowable deviations as follows:

- A deviation from the San Diego Nexus Technology Centre Specific Plan, Specific Plan Development Standards, Table 1 to allow for an increase in Maximum Lot Coverage (Lot 5 max = 25% = 17,054 square feet (sf), proposed = 22% = 15,329sf; Lot 6 max = 30% = 29,155 sf, proposed = 44% = 43,177 sf). Combined Total = 27% = 46,209 sf, proposed Max Lot Coverage deviation = 35% = 58,506 sf).
- A deviation from the San Diego Nexus Technology Centre Specific Plan, Specific Plan Development Standards, Section C. Building Height to allow a five-story 84-foot, 7-inch-tall structure (measured from the original grade) where the Specific Plan states building height shall be restricted to no greater than 60 feet above adjacent grade, with a maximum of four stories above grade, provided however, that with respect to Lot 5 the building will be restricted to three stories and 45 feet of height.
- A deviation from the San Diego Nexus Technology Centre Specific Plan, Specific Plan Development Standards, Section D. Parking to allow a five level parking structure where the Specific Plan Development Standards states above ground parking structures shall have a maximum height of one-half-story.
- A deviation from the San Diego Nexus Technology Centre Specific Plan, Specific Plan Development Standards, Section I. for the signage setbacks, which provide "The maximum sign height is not to exceed 5 feet and shall be set back 20 feet from the property line." The project is proposing signage to be set back from the property line 2 feet, 10 inches
- A deviation from the SDMC Section 131.0643 to allow (i) a 1-foot, 11-inch setback encroachment along a 12-foot, 9-inch length of the building face in the northwest corner and a 2-foot, 9-inch setback encroachment along 54-foot, 49-inch length of the building face in the southwest corner where the standard is a minimum 20-foot street side setback; and (ii) a 3-foot setback encroachment along a 10-foot, 1-inch area at the southwest corner of the parking garage where the standard is a minimum 15-foot setback. The deviation would allow a 17-foot, 3-inch minimum street side setback on Executive Drive and a 12-foot setback on Executive Way.
- A deviation from the 30-foot landscape buffer requirement between the development and the abutting multi-family residential property as required by the Nexus Technology Centre Specific Plan 85-0446. The 30-foot setback is provided along the envelop of the proposed parking structure and bio-basin but a reduced 26-foot landscape buffer is requested at each tree island and a reduced 22-foot landscape buffer is requested along the easterly surface parking lot.
- Findings for the NDP must be met per SDMC Section 126.0404(a) and supplemental findings for deviations as a sustainable project per Section 126.404(f).

Figure 3 presents the proposed site plan. The office building would be surrounded by parking/hardscape and landscaping. The project includes pedestrian paths to provide access between the office building, parking areas, and both Executive Drive and Executive Way. All landscaping, brush management, and irrigation would conform to the requirements of the

City of San Diego (City) Landscape Regulations (San Diego Municipal Code), the Land Development Manual, and the Landscape Standards.

Vehicular driveway access to the project site would continue to be provided via Executive Drive and Executive Way. Both access points would be supported by secondary driveways and internal roadways that would provide access to the surface-level parking area, the basement underneath the main structure, and the four-level parking structure.
The project would modify existing on-site water, stormwater, and sewer utility lines for compatibility with design of the new facility. The project would connect to existing underground utility lines located within Executive Drive.

Proposed grading activities would disturb the entire 3.79-acre project site. Grading would consist of approximately 15,400 cubic yards of cut and 1,800 cubic yards of fill, resulting in a net export of 13,600 cubic yards that would be recycled using the City's Clean Fill Dirt Program or an approved Clean Fill Dirt handler listed on the City's Certified Construction & Demolition Recycling Facilities Directory.

3.3 Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, has consultation begun?

In accordance with the requirements of Public Resources Code 21080.3.1, the City of San Diego provided formal notifications to the Iipay Nation of Santa Ysabel, the Jamul Indian Village, and the San Pasqual Band of Mission Indians which are traditionally and culturally affiliated with the project area. No requests for project consultation were received from any of the Native American Tribes within the notification period, and therefore consultation was concluded.

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21083.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

4 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

☐ Land Use	☐ Air Quality	☐ Biological Resources
☐ Energy	☐ Geology, Soils, and Seismicity	☐ Greenhouse Gas Emissions
☐ Health and Safety	☐ Historical, Archaeological, and Tribal Cultural Resources	☐ Hydrology/Water Quality
☐ Noise	☐ Paleontological Resources	☐ Public Services and Facilities
☐ Public Utilities and Infrastructure	☒ Transportation	☐ Wildfire
☐ Visual Effects and Neighborhood Character	☒ Mandatory Findings of Significance	

5 DETERMINATION (To be completed by Lead Agency)

On the basis of this initial evaluation:

☐ The proposed project COULD NOT have a significant effect on the environment, and a TIERED MITIGATED NEGATIVE DECLARATION will be prepared.

☒ Although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A TIERED MITIGATED NEGATIVE DECLARATION will be prepared.

☐ The proposed project MAY have a significant effect on the environment, and a (SUBSEQUENT/SUPPLEMENTAL) ENVIRONMENTAL IMPACT REPORT is required.

☐ The proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect (a) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (b) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. A (SUBSEQUENT/SUPPLEMENTAL) ENVIRONMENTAL IMPACT REPORT is required but must analyze only the effects that remain to be addressed.

6 EVALUATION OF ENVIRONMENTAL IMPACTS

The City of San Diego has defined the column headings in the Tiered Initial Study Checklist as follows:

1. Potentially Significant Impact" is appropriate if there is substantial evidence that the project's effect may be significant. If there is one or more "Potentially Significant Impact" entries a Project EIR will be prepared.

2. "Project Impact Adequately Addressed in PEIR" applies where the potential impacts of the proposed project were adequately addressed in the *Complete Communities: Housing Solutions and Mobility Choices Program EIR*, as specified in the analysis, and Project will mitigate any impacts of the proposed project to the extent feasible. *Complete Communities: Housing Solutions and Mobility Choices Program EIR* mitigation measures will be incorporated into the project. The potential impact of the proposed project is adequately addressed in the *Complete Communities: Housing Solutions and Mobility Choices Program EIR*. The impact analysis in this document summarizes and cross references (including section/page numbers) the relevant analysis in the *Complete Communities: Housing Solutions and Mobility Choices Program EIR*.

3. "Less Than Significant with Project-level Mitigation Incorporated" applies where the incorporation of project-specific mitigation measures will reduce an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." All project-specific mitigation measures must be described, including a brief explanation of how the measures reduce the effect to a less than significant level.

4. "Less Than Significant Impact" applies where the project will not result in any significant effects. The effects may or may not have been discussed in the *Complete Communities: Housing Solutions and Mobility Choices Program EIR*. The project impact is less than significant without the incorporation of *Complete Communities: Housing Solutions and Mobility Choices Program EIR* mitigation measures or project-specific mitigation.

5. "No Impact" applies where a project would not result in any impact in the category in question or the category simply does not apply. "No Impact" answers do not require an explanation if they are adequately supported by the information sources cited by the lead agency which show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

6. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

7. The discussion in each issue should include the following:

    - Discussion of *Complete Communities: Housing Solutions and Mobility Choices Program EIR* impact (direct and cumulative) conclusions
    - Discussion of potential project impacts
    - Applicable *Complete Communities: Housing Solutions and Mobility Choices Program EIR* mitigation measures assumed in the project
    - Significance determination after *Complete Communities: Housing Solutions and Mobility Choices Program EIR* mitigation measures
    - Additional project-level mitigation measures
    - Significance determination after all mitigation

8. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

9. Supporting Information Sources: A source list should be attached, and other sources utilized, or individuals contacted should be cited in the discussion.

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
6.1. LAND USE – Would the project: Issue 1: Cause a significant environmental impact due to a conflict with any land use plan, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒	☐

The project would be consistent with the Industrial Employment General Plan designation and the Industrial/Scientific Research University Community Plan designation. The project would also be consistent with the Industrial Park (IP-1-1) designation under the Nexus Technology Centre Specific Plan. While the project includes a number of deviations from development standards, none of the deviations would result in environmental impacts. The purpose of the IP zone is to provide for high-quality science and business park development. As described in Section 6.3, Issue 1 below, the project would be required to comply with federal, state, and City regulations, including avoidance of impacts to nesting bird species, through implementation of measures that would be spelled out as conditions of approval for the project that would reduce impacts on nesting migratory birds and raptors to a level less than significant. As described in Section 6.6, Issue 2 below, project consistency with the City's CAP Consistency Checklist would ensure that the project's contribution of greenhouse gas (GHGs) to cumulative statewide emissions would be less than cumulatively considerable. Therefore, the project would not cause a significant environmental impact due to a conflict with any land use plan, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, and impacts would be less than significant.

Issue 2: Lead to the development of conversion of General Plan or community designated open space or prime farmland to a more intensive land use, resulting in a physical division of the community?	☐	☐	☐	☐	☒

The project site is designated Industrial Employment per the City General Plan and Industrial-Scientific Research per the University Community Plan. Additionally, the project site is zoned as Industrial Park (IP-1-1) under the Nexus Technology Centre Specific Plan. Therefore, the project site is not designated open space. The Department of Conservation "California Important Farmland Finder" classifies the project site and surrounding properties as "urban and built up land" (State of California Department of Conservation 2016). Therefore, the project site does not consist of prime farmland.

The project consists of redevelopment of an urbanized site. All work would occur within the project parcels, would not affect any adjacent parcels, and would not result in any permanent changes to the existing land use plan. The project would utilize the existing vehicular driveway access points that are provided via Executive Drive and Executive Way and would not result in any changes to the existing circulation network. Additionally, the project site is currently served by existing public services and utilities and would connect to the existing utility lines located within Executive Drive. Therefore, the project would not develop or convert General Plan or community designated open space or prime farmland to a more intensive land use, resulting in a physical division of the community. No impacts would occur.

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
Issue 3: Result in land uses which are not compatible with an adopted airport land use compatibility plan?	☐	☐	☐	☒	☐

The project site is located within the MCAS Miramar Airport Land Use Compatibility Plan (ALUCP) Review Areas 1 and 2, ALUCP Noise Contours (60 to 65 CNEL), and FAA Part 77 Noticing Area. The project site is not located within any ALUCP Safety Zones.

The project would comply with the noise and airspace protection compatibility requirements in Sections 132.1510 through 132.1525 of the Land Development Code (LDC). Specifically, the proposed use qualifies as a Regional & Corporate Headquarters use which is permitted within the 60 to 65 CNEL aircraft noise exposure area per Section 132.1510, Table 132-15D of the LDC. Therefore, the project would be consistent with the MCAS Miramar Airport ALUCP, and impacts would be less than significant.

6.2. AIR QUALITY - Would the project:					
Issue 1: Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	☒	☐

The Regional Air Quality Strategy (RAQS) is the applicable regional air quality plan that sets forth the San Diego Air Pollution Control District's (SDAPCD's) strategies for achieving the national or California ambient air quality standards. The San Diego Air Basin (SDAB) is designated non-attainment for the federal and state ozone standard. Accordingly, the RAQS was developed to identify feasible emission control measures and provide expeditious progress toward attaining the standards for ozone. The two pollutants addressed in the RAQS are reactive organic gas (ROG) and oxides of nitrogen (NOx), which are precursors to the formation of ozone. Projected increases in motor vehicle usage, population, and growth create challenges in controlling emissions and by extension to maintaining and improving air quality. The RAQS, in conjunction with the Transportation Control Measures, were most recently adopted in 2016 as the air quality plan for the region.

The growth projections used by the SDAPCD to develop the RAQS emissions budgets are based on the population, vehicle trends, and land use plans developed in general plans and used by the San Diego Association of Governments (SANDAG) in the development of the regional transportation plans and sustainable communities strategy. As such, projects that propose development that is consistent with the growth anticipated by SANDAG's growth projections and/or the general plan would not conflict with the RAQS. In the event that a project would propose development that is less dense than anticipated by the growth projections, the project would likewise be consistent with the RAQS. In the event a project proposes development that is greater than anticipated in the growth projections, further analysis would be warranted to determine if the project would exceed the growth projections used in the RAQS for the specific subregional area.

The project would be consistent with the Industrial Employment General Plan designation and the Industrial/Scientific Research University Community Plan designation. The project would also be consistent with the Industrial Park (IP-1-1) designation under the Nexus Technology Centre Specific Plan. Therefore, the project would be consistent with the growth assumptions of the General Plan.

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact

Additionally, as discussed under Section 6.2, Issue 2 below, project construction and operation would not generate emissions in excess of the applicable screening level thresholds for all criteria pollutants. Consequently, the project would not result in an increase in emissions that are not already accounted for in the RAQS emissions budgets. Therefore, the project would not obstruct or conflict with implementation of the RAQS, and impacts would be less than significant.

Issue 2: Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☐	☒	☐

The region is classified as an attainment area for all criterion pollutants except ozone, respirable particulate matter (PM_{10}), and fine particulate matter ($PM_{2.5}$). The SDAB is a non-attainment area for the 8-hour federal and state ozone standards. Ozone is not emitted directly, but is a result of atmospheric activity on precursors. NO_X and ROG are known as the chief "precursors" of ozone. These compounds react in the presence of sunlight to produce ozone. $PM_{2.5}$ includes fine particles that are found in smoke and haze, and are emitted from all types of combustion activities (motor vehicles, power plants, wood burning, etc.) and certain industrial processes. PM_{10} includes both fine and coarse dust particles, and sources include crushing or grinding operations and dust from paved or unpaved roads.

Construction and operation air emissions were calculated using California Emissions Estimator Model (CalEEMod) 2020.4.0 (California Air Pollution Control Officers Association [CAPCOA] 2021). The CalEEMod program is a tool used to estimate air emissions resulting from land development projects based on California-specific emission factors. The model estimates mass emissions from two basics sources: construction sources and operational sources (i.e., area, energy, and mobile sources).

Inputs to CalEEMod include such items as the air basin containing the project, land uses, trip generation rates, trip lengths, vehicle fleet mix (i.e., percentage of autos, medium truck, etc.), trip destination (i.e., percent of trips from home to work, etc.), duration of construction phases, construction equipment usage, grading areas, season, and ambient temperature, as well as other parameters. The CalEEMod output files indicate the specific outputs for each model run (Appendix A; RECON Environmental, Inc [RECON] 2022a). Emissions of NO_X, carbon monoxide (CO), sulfur oxides (SO_X), PM_{10}, $PM_{2.5}$, and ROG are calculated. Emission factors are not available for lead, and consequently, lead emissions are not calculated. The SDAB is currently in attainment of the federal and state lead standards. Furthermore, fuel used in construction equipment and most other vehicles is not leaded.

Construction Emissions

Construction-related activities are temporary, short-term sources of air emissions. Sources of construction-related air emissions include the following:

- Fugitive dust from grading activities;
- Construction equipment exhaust;

- Construction-related trips by workers, delivery trucks, and material-hauling trucks; and
- Construction-related power consumption.

Construction-related pollutants result from dust raised during demolition and grading, emissions from construction vehicles, and chemicals used during construction. Fugitive dust emissions vary greatly during construction and are dependent on the amount and type of activity, silt content of the soil, and the weather. Vehicles moving over paved and unpaved surfaces, demolition, excavation, earth movement, grading, and wind erosion from exposed surfaces are all sources of fugitive dust. Construction operations are subject to the requirements established in Regulation 4, Rules 52, 54, and 55, of the SDAPCD's rules and regulations.

Heavy-duty construction equipment is usually diesel powered. In general, emissions from diesel-powered equipment contain more NO_X, SO_X, and particulate matter than gasoline-powered engines. However, diesel-powered engines generally produce less CO and less ROG than do gasoline-powered engines. Standard construction equipment includes tractors/loaders/backhoes, rubber-tired dozers, excavators, graders, cranes, forklifts, rollers, paving equipment, generator sets, welders, cement and mortar mixers, and air compressors.

Primary inputs are the numbers of each piece of equipment and the length of each construction stage. Specific construction phasing and equipment parameters are not available at this time. However, CalEEMod can estimate the required construction equipment when project-specific information is unavailable. The estimates are based on surveys, performed by the South Coast Air Quality Management District and the Sacramento Metropolitan Air Quality Management District, of typical construction projects which provide a basis for scaling equipment needs and schedule with a project's size. Air emission estimates in CalEEMod are based on the duration of construction phases; construction equipment type, quantity, and usage; grading area; season; and ambient temperature, among other parameters. Construction emissions were modeled assuming construction would begin in July 2022 and last for approximately 14 months, which is the CalEEMod default construction duration for the entered land uses. Assuming construction would begin in July 2022 is conservative, as continued implementation of regulations for off-road equipment, the primary construction emission source, would reduce emissions from these sources over time.

Table 1 shows the total projected construction maximum daily emission levels for each criteria pollutant.

Table 1
Summary of Maximum Construction Emissions
(pounds per day)

Construction	Pollutant					
	ROG	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Demolition	3	27	21	<1	3	1
Site Preparation	3	33	20	<1	21	12
Grading	3	57	24	<1	12	6
Building Construction	2	19	20	<1	2	1
Paving	1	9	13	<1	1	<1
Architectural Coatings	94	1	2	<1	<1	<1
Maximum Daily Emissions	**94**	**57**	**24**	**<1**	**21**	**12**
Significance Threshold	*137*	*250*	*550*	*250*	*100*	*67*

SOURCE: Appendix A; RECON 2022a.

Standard dust control measures would be implemented as a part of project construction in accordance with SDAPCD rules and regulations. Fugitive dust emissions were calculated using CalEEMod default values and did not take into account the required dust control measures. Thus, the emissions shown in Table 1 are conservative.

For assessing the significance of the air quality emissions resulting during construction of the project, the construction emissions were compared to the screening thresholds shown in Table 1. As shown in Table 1, maximum daily construction emissions associated with the project are projected to be less than the applicable thresholds for all criteria pollutants. Therefore, project construction would not result in a cumulatively considerable net increase of non-attainment criteria pollutants, and impacts would be less than significant.

Operational Emissions

Mobile source emissions would originate from traffic generated by the project. Area source emissions would result from the use of consumer products, architectural coatings, and landscaping activities. Energy source emissions would result from the use of natural gas.

Mobile source operational emissions are based on the trip rate, trip length for each land use type and size. The project would generate 1,312 daily trips (1,259 daily trips with application of transit credits, Urban Systems Associates, Inc. 2022a Trip distances are multiplied by the total trip generation of the project to determine total project annual vehicle miles traveled. Default trip distances and default vehicle emission factors for the soonest fully operational year of 2024 were used.

Area source emissions associated with the project include consumer products, natural gas used in space and water heating, architectural coatings, and landscaping equipment. Hearths (fireplaces) and woodstoves are also a source of area emissions; however, the project would not include hearths or woodstoves. Consumer products are chemically formulated products used by household and institutional consumers, including, but not limited to, detergents, cleaning compounds, polishes, floor finishes, disinfectants, sanitizers, and aerosol paints but not including other paint products,

furniture coatings, or architectural coatings. Emissions due to consumer products are calculated using total building area and product emission factors.

For architectural coatings, emissions result from evaporation of solvents contained in surface coatings such as in paints and primers. Emissions are based on the building surface area, architectural coating emission factors, and a reapplication rate of 10 percent of area per year. Landscaping maintenance includes fuel combustion emission from equipment such as lawn mowers, rototillers, shredders/grinders, blowers, trimmers, chain saws, and hedge trimmers as well as air compressors, generators, and pumps. Emission calculations take into account building area, equipment emission factors, and the number of operational days (summer days).

Energy source emissions associated with the project include natural gas used in space and water heating. Emissions are generated from the combustion of natural gas used in space and water heating. Emissions are based on the Residential Appliance Saturation Survey which is a comprehensive energy use assessment that includes the end use for various climate zones in California.

Table 2 provides a summary of the operational emissions generated by the project. As shown in Table 2, project-generated operational emissions are projected to be less than the screening level thresholds for all criteria pollutants. Therefore, project operation would not result in a cumulatively considerable net increase of non-attainment criteria pollutants, and impacts would be less than significant.

Table 2
Summary of Project Operational Emissions
(pounds per day)

Source	Pollutant					
	ROG	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Area Sources	4	<1	<1	<1	<1	<1
Energy Sources	<1	1	1	<1	<1	<1
Mobile Sources	4	4	36	<1	8	2
Total	**8**	**5**	**37**	**<1**	**8**	**2**
Significance Threshold	*137*	*250*	*550*	*250*	*100*	*67*

NOTE: Totals may vary due to independent rounding.
SOURCE: Appendix A; RECON 2022a.

Issue 3: Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☐	☒	☐

Sensitive land uses include schools and schoolyards, parks and playgrounds, daycare centers, nursing homes, hospitals, and residential communities. The nearest sensitive receptors are the multi-family residential uses located immediately east of the project site.

Carbon Monoxide Hot Spots

Localized CO concentration is a direct function of motor vehicle activity at signalized intersections (e.g., idling time and traffic flow conditions), particularly during peak commute hours and meteorological conditions. The SDAB is a CO maintenance area under the federal Clean Air Act. This means that the SDAB was previously a non-attainment area and is currently implementing a 10-year plan for continuing to meet and maintain air quality standards.

Due to increased requirements for cleaner vehicles, equipment, and fuels, CO levels in the state have dropped substantially. All air basins are attainment or maintenance areas for CO. Therefore, more recent screening procedures based on more current methodologies have been developed. The Sacramento Metropolitan Air Quality Management District developed a screening threshold in 2011, which states that any project involving an intersection experiencing 31,600 vehicles per hour or more will require detailed analysis. In addition, the Bay Area Air Quality Management District developed a screening threshold in 2010 which states that any project involving an intersection experiencing 44,000 vehicles per hour would require detailed analysis. This analysis conservatively assesses potential CO hot spots using the South Coast Air Quality Management District screening threshold of 31,600 vehicles per hour.

The project would generate 1,312 daily trips (1,259 daily trips with application of transit credits). Based on the project daily traffic volumes on roadways in the vicinity of the project site (SANDAG 2022), the hourly turning volumes at the intersections included in the Local Mobility Analysis traffic study area are projected to be well less than 31,600 vehicles per hour (Urban Systems Associates, Inc. 2022a). Therefore, the project would not expose sensitive receptors to a substantial pollutant concentration associated with a CO hot spot, and impacts would be less than significant.

Diesel Particulate Matter – Construction

Project construction would result in short-term diesel exhaust emissions from on-site heavy-duty equipment. Project construction would also result in the generation of diesel particulate matter (DPM) emissions from the use of off-road diesel equipment required for site grading and excavation, paving, and other construction activities and on-road diesel equipment used to bring materials to and from the project site.

Generation of DPM from construction projects typically occurs in a single area for a short period. Based on CalEEMod default values, construction is anticipated to last for approximately 14 months. The dose to which the receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance or substances in the environment and the extent of exposure that person has with the substance. Dose is positively correlated with time, meaning that a longer exposure period would result in a higher exposure level for the Maximally Exposed Individual. The risks estimated for a Maximally Exposed Individual are higher if a fixed exposure occurs over a longer period of time. According to the Office of Environmental Health Hazard Assessment (OEHHA), health risk assessments, which determine the exposure of sensitive receptors to toxic emissions, should be based on a 30-year exposure period; however, such assessments should be limited to the period/duration of activities associated with the project (OEHHA 2015). Thus, if the duration of proposed construction activities near any specific sensitive

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact

receptor were 14 months, the exposure would be 4 percent of the total 30-year exposure period used for health risk calculation. Furthermore, the project would implement construction best management practices and would be conducted in accordance with California Air Resources Board (CARB) regulations. Specifically, the project would implement the following Best Available Control Technology for Toxics (T-BACT) measures during construction:

- The construction fleet shall use any combination of diesel catalytic converters, diesel oxidation catalysts, diesel particulate filters and/or utilize CARB/United States Environmental Protection Agency (U.S. EPA) Engine Certification Tier 3 or better, or other equivalent methods approved by the CARB.
- The engine size of construction equipment shall be the minimum size suitable for the required job.
- Construction equipment shall be properly tuned and maintained in accordance with the manufacturer's specifications.
- Per CARB's Airborne Toxic Control Measures 13 (California Code of Regulations Chapter 10 Section 2485), the applicant shall not allow idling time to exceed 5 minutes unless more time is required per engine manufacturers' specifications or for safety reasons.

Therefore, DPM generated by project construction is not expected to create conditions where the probability is greater than 10 in 1 million of contracting cancer for the Maximally Exposed Individual or to generate ground-level concentrations of noncarcinogenic toxic air contaminants that exceed a Hazard Index greater than 1 for the Maximally Exposed Individual. Additionally, with ongoing implementation of U.S. EPA and CARB requirements for cleaner fuels; off-road diesel engine retrofits; and new, low-emission diesel engine types, the DPM emissions of individual equipment would be substantially reduced. Therefore, project construction would not expose sensitive receptors to substantial pollutant concentration associated with DPM, and impacts would be less than significant.

Issue 4: Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☐	☒	☐

The project does not include heavy industrial or agricultural uses that are typically associated with odor complaints. During construction, diesel equipment may generate some nuisance odors. The project site is surrounded by multi-family residential uses immediately to the east, commercial uses on the northern side of Executive Drive approximately 180 feet and more to the north, on the western side of Executive Way approximately 100 feet to the west and 250 feet to the southwest, and a hotel and restaurant approximately 100 feet or more to the south. However, exposure to odors associated with project construction would be short term and temporary in nature. Additionally, CARB's In-Use Off-Road Diesel-Fueled Fleets Regulation outlined above would reduce construction exhaust emissions, which would also reduce construction-related odors. Therefore, the project would not generate objectionable odors adversely affecting a substantial number of people, and impacts would be less than significant.

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
6.3. BIOLOGICAL RESOURCES – Would the project:					
Issue 1: Result in a substantial adverse impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in the Multiple Species Conservation Program or other local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒	☐

The project site is currently developed and consists of three one-level structures, asphalt concrete parking areas, and landscaping. Consequently, the project site does not possess any native vegetation that would serve as habitat area. However, ornamental trees located throughout the project site may provide suitable nesting habitat for migratory birds and raptors protected under the federal Migratory Bird Treaty Act and California Fish and Game Code Sections 3503 and 3503.3. Migratory birds and raptors protected under these federal and state statues, as well as their nests and eggs, may not be taken, possessed, or destroyed. The project would be required to comply with federal, state, and City regulations, including avoidance of impacts to nesting bird species. To ensure compliance with these regulations and minimize or avoid impacts to sensitive biological resources, a qualified biological monitor will be retained. The biological monitor will attend the pre-construction meeting, be present during construction as needed to prevent impacts to protected avian species, educate construction personnel, and coordinate with and report to the City's Mitigation Monitoring Coordination section. These measures will be spelled out as conditions of approval for the project. Therefore, the project would not result in a substantial adverse impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species, and impacts would be less than significant.

Issue 2: Result in a substantial adverse impact on any Tier I Habitats, Tier II Habitats, Tier IIIA Habitats, or Tier IIIB Habitats as identified in the Biology Guidelines of the Land Development Manual or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☐	☒

The project site is currently developed and consists of three one-level structures, asphalt concrete parking areas, and ornamental landscaping. According to the City's Biology Guidelines (City of San Diego 2018), developed land has not been assigned a tier and is not considered to have significant habitat value. Similarly, impacts to developed land are not considered significant by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. Therefore, the project would not result in a substantial adverse impact on any sensitive habitats. No impact would occur.

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
Issue 3: Result in a substantial adverse effect on 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 is currently developed and consists of three one-level structures, asphalt concrete parking areas, and ornamental landscaping. The project site does not contain any wetlands as defined by section 404 of the Clean Water Act. Therefore, the project would not result in a substantial adverse effect on federally protected wetlands. No impact would occur.

Issue 4: Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	☒	☐

Wildlife movement corridors are defined as areas that connect suitable wildlife habitat areas in a region otherwise fragmented by rugged terrain, changes in vegetation, or human disturbance. Natural features such as canyon drainages, ridgelines, or areas with vegetation cover provide corridors for wildlife travel. The project site is currently developed, and is bounded by industrial development, roads, and fencing which ultimately restricts its use by wildlife. Furthermore, the project site is not designated as a Multiple Species Conservation Program (MSCP) regional wildlife corridor as it does not provide a throughway for wildlife species by connecting with major areas of off-site habitat. Therefore, the project would not interfere substantially with the movement of any native resident or migratory species or with established native resident or migratory wildlife corridor, and impacts would be less the significant.

As described in Section 6.3, Issue 1 above, tree removal would have the potential to impact nesting migratory birds and raptors, which would be considered a significant impact. However, the project would be required to comply with federal, state, and City regulations, including avoidance of impacts to nesting bird species, through implementation of measures that would be spelled out as conditions of approval for the project. Therefore, the project would not interfere substantially impede the use of native wildlife nursery sites, and impacts would be less the significant.

Issue 5: Result in a conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan, either within the Multiple Species Conservation Program (MSCP) plan area or in the surrounding region?	☐	☐	☐	☒	☐

The project site does not lie within the boundaries of the City's Multiple Species Conservation Plan Subarea. Furthermore, there are no Multi-Habitat Planning Areas mapped on-site or adjacent to the project. The project site is currently developed and does not possess any native habitat. As

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact

described in Section 6.3, Issue 1 above, the project would be required to comply with federal, state, and City regulations, including avoidance of impacts to nesting bird species, through implementation of measures that would be spelled out as conditions of approval for the project. Therefore, the project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan, and impacts would be less than significant.

Issue 6: Result in a conflict with the provisions of an any local policies or ordinances protecting biological resources?	☐	☐	☐	☒	☐

The project site is currently developed and does not possess any native habitat. The Tree & Palm Evaluation Report prepared for the project determined that none of the trees on-site are considered protected species, rare or endangered. Several street palms would be subject to protection, but they are located within City right-of-way and would not be impacted by the project (Appendix B; Arborgate Consulting, Inc. 2021). As described in Section 6.3, Issue 1 above, the project would be required to comply with federal, state, and City regulations, including avoidance of impacts to nesting bird species, through implementation of measures that would be spelled out as conditions of approval for the project that would ensure consistency with the City's Environmentally Sensitive Lands Regulations. Therefore, the project would not conflict with the provisions of an any local policies or ordinances protecting biological resources, and impacts would be less than significant.

6.4. ENERGY – Would the project:					
Issue 1: Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☐	☒	☐

Energy use associated with a project typically includes fuel (gasoline and diesel), electricity, and natural gas, and sources include the following:

- Construction-related vehicle and equipment energy use;
- Transportation energy use from people traveling to and from the project area during operation; and
- Building and facility energy use of the proposed project during operation.

Construction-Related Energy Use

Energy use during construction would occur within two general categories: fuel use from vehicles used by workers commuting to and from the construction site, and fuel use by vehicles and other equipment to conduct construction activities. Project construction is anticipated to last 14 months. Based on CalEEMod calculations, project construction would require a maximum of 121 worker vehicle trips per day and 53 vendor trips per day during building construction activities. All other construction activities would require fewer worker and vendor vehicle trips. Additionally, a total of 137 hauling trips would be required during the demolition phase and 1,700 hauling trips would be required during the grading/soil export phase. CalEEMod output files are presented in Appendix A. Fuel consumption associated with construction worker commute would be similar of any other

typical commute in San Diego County, and would not result in a wasteful, inefficient, or unnecessary consumption of gasoline or diesel fuel. Consistent with state requirements, all construction equipment would meet CARB Tier 3 In-Use Off-Road Diesel Engine Standards. Engines are required to meet certain emission standards, and groups of standards are referred to as Tiers. A Tier 0 engine is unregulated with no emission controls, and each progression of standard level (i.e., Tier 1, Tier 2, Tier 3, etc.) generate lower emissions, use less energy, and are more advanced technologically than the previous tier. CARB's Tier 3 In-Use Off-Road Diesel Engine Standards requires that construction equipment fleets become cleaner and use less energy over time. There are no known conditions in the project area that would require nonstandard equipment or construction practices that would increase fuel-energy consumption above typical equipment fuel consumption rates. Additionally, construction activities would be temporary and short term (14 months) and would adhere to all construction best management practices (BMPs). Therefore, project construction would not result in the wasteful, inefficient, or unnecessary consumption of energy resources, and impacts would be less than significant.

Operation-Related Energy Use

During operation, energy use would be associated with transportation-related fuel use (gasoline, diesel fuel, and electric vehicles), and building-related energy use (electricity and natural gas).

Transportation-Related Energy Use

Buildout of the project and vehicle trips associated with project operation would result in transportation energy use. Trips by individuals traveling to and from the project site would consist of passenger vehicles mostly powered by gasoline, with some fueled by diesel or electricity. The project would generate 1,312 daily trips (1,259 daily trips with application of transit credits). Compared to the overall number of vehicle trips generated in the city, this amount of vehicle traffic would be negligible. Additionally, as discussed in Section 6.6 Greenhouse Gas Emissions below, the project would implement measures that would reduce trips and VMT, including electric vehicle parking; designated parking for low-emitting, fuel-efficient, and carpool/vanpool vehicles, short-term and long-term bicycle parking, showers and lockers; a parking management plan; participation in the SANDAG iCommute program; a 75 percent transit, carpool, and vanpool subsidy; and the provision of an on-site gym and café.

Project fuel consumption would decline over time beyond the initial operational year of the project due to continued implementation of increased federal and state vehicle efficiency standards. There is no component of the project that would result in unusually high vehicle fuel use during operation. Therefore, operation of the project would not result in wasteful, inefficient, or unnecessary consumption of energy resources, and impacts would be less than significant.

Non-Transportation-Related Energy Use

Non-transportation energy use would be associated with electricity and natural gas. The Renewables Portfolio Standard (RPS) promotes diversification of the state's electricity supply and decreased reliance on fossil fuel energy sources. Renewable energy includes (but is not limited to) wind, solar, geothermal, small hydroelectric, biomass, anaerobic digestion, and landfill gas. Originally adopted in 2002 with a goal to achieve a 20 percent renewable energy mix by 2020 (referred to as the "Initial

RPS"), the goal has been accelerated and increased by Executive Orders (EO) S-14-08 and S-21-09 to a goal of 33 percent by 2020. In April 2011, SB 2 (1X) codified California's 33 percent RPS goal. SB 350 (2015) increased California's renewable energy mix goal to 50 percent by year 2030. SB 100 (2018) further increased the standard set by SB 350 establishing the RPS goal of 44 percent by the end of 2024, 52 percent by the end of 2027, and 60 percent by 2030. Once operational, the project would be served by San Diego Gas & Electric (SDG&E). Based on the most recent annual report, SDG&E has already procured 39 percent (California Public Utilities Commission 2021) renewable energy and is on track to procure 60 percent by 2030 as outlined in SDG&E's 2019 RPS Procurement Plan.

The California Code of Regulations, Title 24, is referred to as the California Building Code (CBC). It consists of a compilation of several distinct standards and codes related to building construction, including plumbing, electrical, interior acoustics, energy efficiency, handicap accessibility, and so on. Of particular relevance to GHG reductions are the CBC's energy efficiency and green building standards as outlined below.

Title 24, Part 11 of the California Code of Regulations is CALGreen. Beginning in 2011, CALGreen instituted mandatory minimum environmental performance standards for all ground-up new construction of commercial and low-rise residential buildings, state-owned buildings, schools, and hospitals. It also includes voluntary tiers (I and II) with stricter environmental performance standards for these same categories of residential and non-residential buildings. Local jurisdictions must enforce the minimum mandatory requirements and may adopt CALGreen with amendments for stricter requirements.

The project would, at a minimum, be required to comply with the mandatory measures included in the current 2019 Energy Code (California Code of Regulations, Title 24, Part 6) and the 2019 CALGreen standards. The mandatory standards require the following:

- Outdoor water use requirements as outlined in local water efficient landscaping ordinances or current Model Water Efficient Landscape Ordinance standards, whichever is more stringent;
- Requirements for water conserving plumbing fixtures and fittings;
- 65 percent construction/demolition waste diverted from landfills;
- Inspections of energy systems to ensure optimal working efficiency; and
- Low-pollutant emitting exterior and interior finish materials such as paints, carpets, vinyl flooring, and particle boards.

Electricity and natural gas service to the project would be provided by SDG&E. Once operational, the proposed building would use electricity and natural gas to run various appliances and equipment, including space and water heaters, air conditioners, ventilation equipment, lights, and numerous other devices. Generally, electricity use is higher in the warmer months due to increased air conditioning needs, and natural gas use is highest when the weather is colder as a result of high heating demand. As a part of the air quality modeling prepared for the project, CalEEMod was used to estimate the total operational electricity and natural gas consumption associated with the project. Table 3 summarizes the anticipated operational energy and natural gas use.

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact

Table 3
Operational Electricity and Natural Gas Use

	Total Use
Electricity	2,281,310 kWh/Year
Natural Gas	3,145,970 kBTU/Year

kwH = kilowatt hour; BTU = British thermal units
SOURCE: Appendix A; RECON 2022a.

Buildout of the project would result in an increase of operational electricity and natural gas usage when compared to the existing condition. The project would be required to meet the mandatory energy requirements of 2019 CALGreen and the California Energy Code (Title 24, Part 6 of the California Code of Regulations) and would benefit from the efficiencies associated with these regulations as they relate to building heating, ventilating, and air conditioning mechanical systems, water-heating systems, and lighting. Additionally, the project would implement all applicable GHG reduction measures related to energy efficiency and clean energy as required by the City's Climate Action Plan (CAP; see Section 6.6) below. Therefore, there are no project features that would support the use of excessive amounts of energy or would create unnecessary energy waste, or conflict with any adopted plan for renewable energy efficiency, and impacts would be less than significant.

Issue 2: Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐	☒	☐

The applicable state plans that address renewable energy and energy efficiency are CALGreen, the California Energy Code, and RPS, and the applicable local plan is the CAP. As discussed under Section 6.4, Issue 1 above, the project would be required to meet the mandatory energy requirements of 2019 CALGreen and the 2019 California Energy Code. The project would not conflict with or obstruct implementation of CALGreen and the California Energy Code, or with SDG&E's implementation of RPS. Additionally, as detailed in Section 6.6 below, the project would be consistent with the City's CAP. Therefore, the project wound not conflict with or obstruct a state or local plan for renewable energy or energy efficiency, and impacts would be less than significant.

6.5. GEOLOGY/SOILS/SEISMICITY – Would the project:					
Issue 1: Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure, including liquefaction, or landslides?	☐	☐	☐	☒	☐

A site-specific Geotechnical Investigation was completed for the project by Geocon (Appendix C; Geocon 2021). Review of the City's Seismic Safety Study, Geologic Hazards and Faults, Map Sheet 34, during preparation of the Geotechnical Investigation determined that the project site is designated as Hazard Category 51: *Level Mesas – underlain by terrace deposits and bedrock, nominal risk*. The Geotechnical Investigation determined that the project site is not underlain by an active fault and is not located within a state of California earthquake fault zone. Therefore, the risk associated with

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact

fault rupture is considered very low. The Geotechnical Investigation identified a potentially active fault is located about 650 feet northwest of the site. This fault, along with other faults within the seismically active southern California region, could generate strong seismic shaking. However, the project would be required to comply with all recommendations presented in the Geotechnical Investigation. The project would be required to comply with seismic requirement of the California Building Code, utilize proper engineering design and standard construction practices, to be verified at the building permit stage, in order to ensure that would reduce impacts to people or structures to an acceptable level of risk. Therefore, impacts would be less than significant.

Liquefaction generally occurs in areas where four criteria are met: the site is subject to seismic activity; on-site soil consists of cohesionless soil or silt and clay with low plasticity; groundwater is encountered within 50 feet of the surface; and soil relative densities are less than 70 percent. Due to the absence of a near-surface groundwater elevation and the dense to very dense nature of the on-site soils, the potential for liquefaction is considered to be very low. The project site is relatively flat with elevations ranging from 395 to 405 feet above mean sea level. Additionally, review of published geologic maps during preparation of the Geotechnical Investigation determined there were no mapped landslide areas on or near the project site. Therefore, risks associated with landslides are considered very low. The Geotechnical Investigation also determined that risk associated with liquefaction is considered low due to the dense nature of soils underlying the project site, lack of permanent shallow groundwater, and proposed grading. Therefore, the project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure, including liquefaction, or landslides, and impacts would be less than significant.

Issue 2: Result in substantial soil erosion or the loss of topsoil?	☐	☐	☐	☒	☐

All grading activities within the site would be required to comply with the City Grading Ordinance, which ensures soil erosion and topsoil loss is minimized through the issuance of a Grading Permit. Grading permits typically require projects to implement measures to prevent surface waters from damaging the face of any excavation or fill, ensuring erosion is minimized. Additionally, the project would employ best management practices to control erosion and prevent topsoil from exiting the site. Therefore, the project would not result in substantial soil erosion or the loss of topsoil, and impacts would be less than significant.

Issue 3: Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☐	☒	☐

As described in Section 6.5, Issue 1 above, risks associated with liquefaction and landslide are considered very low. The geotechnical Investigation did not identify any risks associated with lateral spreading or subsidence. Therefore, the project would not be located on a geologic unit or soil that is unstable, and impacts would be less than significant.

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
Issue 4: Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☐	☒	☐

The Geotechnical Investigation determined that soils at the project site have a "very low" to "low" expansion potential. Therefore, the project would not be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), and impacts would be less than significant.

6.6. GREENHOUSE GAS EMISSIONS – Would the project:					
Issue 1: Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☐	☒	☐

The CAP Consistency Checklist is utilized to ensure project-by-project consistency with the underlying assumptions in the CAP and to ensure that the City would achieve its emission reduction targets identified in the CAP. The CAP Consistency Checklist includes a three-step process to determine if the project would result in a GHG impact. Step 1 consists of an evaluation to determine the project's consistency with existing General Plan, Community Plan, and zoning designations for the site. Step 2 consists of an evaluation of the project's design features compliance with the CAP strategies. Step 3 is only applicable if a project is not consistent with the land use and/or zone, but is also in a transit priority area to allow for more intensive development than assumed in the CAP.

As detailed in the project-specific CAP Consistency Checklist Step 1 (Land Use Consistency), the project is consistent with the allowed uses per the General Plan and University Community Plan land use designations, as well as the zoning designation for the project site, which allow for development of Industrial Scientific Research and Development land uses (Appendix D; RECON 2022b). While the project includes a NDP, the land use designation and type of development would not change. Therefore, the project would be consistent with the land use assumptions used in development of the CAP.

- Furthermore, completion of Step 2 of the CAP Consistency Checklist demonstrates that the project would be consistent with applicable strategies and actions for reducing GHG emissions. This includes project features consistent with the energy and water efficient buildings strategy, as well as bicycling, walking, transit, and land use strategy. The project would implement a Transportation Demand Management Program that would include the following:
    - A parking management plan that includes charging employees market-rate for single-occupancy vehicle parking and providing reserved, discounted, or free spaces for registered carpools or vanpools;
    - A commitment to maintaining an employer network in the SANDAG iCommute program and promoting its RideMatcher service to tenants/employees, flexible or alternative work hours, and a telework program;
    - A 75 percent transit, carpool, and vanpool subsidy; and
    - The provision of a gym and cafe on-site to reduce the need to drive (Appendix D; RECON 2022b).

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact

Based on the project's consistency with existing land use and zoning designations and implementation of the Step 2 strategies and actions for reducing GHG emissions, the project would be consistent with the City's CAP Consistency Checklist, and the project's contribution of GHGs to cumulative statewide emissions would be less than cumulatively considerable. Therefore, the project would not generate greenhouse gas emissions, either directly or indirectly, that would have a significant impact on the environment, and impacts would be less than significant.

Issue 2: Conflict with City's Climate Action Plan or another applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☐	☒	☐

As described in Section 6.6, Issue 1 above, the project would be consistent with the City's CAP Consistency Checklist, and the project's contribution of GHGs to cumulative statewide emissions would be less than cumulatively considerable. Therefore, the project would not conflict with City's CAP or another applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHG, and impacts would be less than significant.

6.7. HEALTH AND SAFETY – Would the project:					
Issue 1: Create a significant hazard to the public or the environment through routine transport, use, or disposal of hazardous materials?	☐	☐	☐	☒	☐

Project construction may involve the use of small amounts of solvents, cleaners, paint, oils and fuel for equipment. However, these materials are not acutely hazardous, and use of these common hazardous materials in small quantities would not represent a significant hazard to the public or environment. Additionally, project construction would be required to be undertaken in compliance with applicable federal, state, and local regulations pertaining to the proper use of these common hazardous materials, including the California Occupational Safety and Health Administration and the California Department of Environmental Health Hazardous Materials Division. Therefore, project construction would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, and impacts would be less than significant.

Operation of the office building and associated parking structure would not involve the routine transport, use, or disposal of significant hazardous materials. Operation of the project may involve the use of small amounts of solvents and cleaners that are not acutely hazardous. Such materials are ubiquitous and product labeling identifies appropriate handling and use of these materials. Therefore, operation of the project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, and impacts would be less than significant.

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
Issue 2: Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☐	☒	☐

As described in Section 6.7, Issue 1 above, project construction would be required to be undertaken in compliance with applicable federal, state, and local regulations pertaining to the proper use of common hazardous materials. Operation of the project would not involve the routine transport, use, or disposal of significant hazardous materials. Driveway connections with Executive Drive and Executive Way would be constructed consistent with all applicable City safety regulations. Therefore, the project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, and impacts would be less than significant.

Issue 3: Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒	☐

Eastgate Christian School is located approximately 0.12 mile northwest of the project site. However, as described in Section 6.7, Issue 1 above, solvents, cleaners, paint, oils and fuel for equipment that would be used during construction are not acutely hazardous, and use of these common hazardous materials in small quantities would not represent a significant hazard to the public or environment. Additionally, project construction would be required to be undertaken in compliance with applicable federal, state, and local regulations pertaining to the proper use of these common hazardous materials. Operation of the project may involve the use of small amounts of solvents and cleaners that are not acutely hazardous. Therefore, the project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school, and impacts would be less than significant.

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, would it create a significant hazard to the public or the environment?	☐	☐	☐	☐	☒

Review of the California Department of Toxic Substances Control EnviroStor Database and State Water Board GeoTracker database determined that there are no contaminated sites on or adjacent to the project site. Furthermore, the project site was not identified on the Department of Toxic Substance Control Cortese List. If construction activities encounter underground contamination, the contractor would be required to implement Section 803, “Encountering or Releasing Hazardous Substances or Petroleum Products,” of the City Standard Specifications for Public Works Construction, which is included in all construction documents and would ensure the proper handling and disposal of any contaminated soils in accordance with all applicable local, state, and federal regulations. Therefore, the project would not be located on a site included on list of hazardous

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact

materials sites compiled pursuant to Government Code Section 65962.5. Thus, no impact would occur.

Issue 5: Result in a safety hazard for people residing or working within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport?	☐	☐	☐	☒	☐

The project site is within the MCAS Miramar ALUCP Review Areas 1 and 2, ALUCP Noise Contours (60 to 65 CNEL), and FAA Part 77 Noticing Area. The project site is not located within any ALUCP Safety Zones.

The project would comply with the noise and airspace protection compatibility requirements in Sections 132.1510 through 132.1525 of the LDC. Specifically, Regional & Corporate Headquarters use is permitted within the 60 to 65 CNEL aircraft noise exposure area per Section 132.1510, Table 132-15D of the LDC. The highest elevation of grade on the project site is 405 feet above mean sea level. The difference between the lowest Part 77 notification surface and the highest elevation of grade equals 170 feet, and as such, the project would not penetrate the notification surface. Therefore, the project would not result in a safety hazard for people working within the MCAS Miramar ALUCP, and impacts would be less than significant.

Issue 6: Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☐	☒

The project site is located in a developed area with access to major roadways that would allow for emergency evacuation. The project would utilize the existing connections with Executive Drive and Executive Way and would not modify the existing roadway network. Therefore, the project would not impair or interfere with an adopted emergency response plan or emergency evacuation plan. No impact would occur.

6.8. HISTORICAL/ARCHAEOLOGICAL/TRIBAL CULTURAL RESOURCES – Would the project:

Issue1: Result in an alteration, including the adverse physical or aesthetic effects and/or destruction of a historic building (including architecturally significant building) structure, object, or site?	☐	☐	☐	☐	☒

The purpose and intent of the Historical Resources Regulations of the Land Development Code (Chapter 14, Division 3, and Article 2) is to protect, preserve and, where damaged, restore the historical resources of San Diego. The regulations apply to all proposed development within the City of San Diego when historical resources are present on the premises. Before approving discretionary projects, CEQA requires the Lead Agency to identify and examine the significant adverse environmental effects which may result from that project. A project that may cause a substantial adverse change in the significance of a historical resource may have a significant effect on the environment (sections 15064.5(b) and 21084.1). A substantial adverse change is defined as

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact

demolition, destruction, relocation, or alteration activities, which would impair historical significance (sections 15064.5(b)(1)). Any historical resource listed in, or eligible to be listed in the California Register of Historical Resources, including archaeological resources, is considered to be historically or culturally significant.

The project site is located within a high sensitivity area on the City's Historical Resources Sensitivity map. Therefore, a record search of the California Historic Resources Information System (CHRIS) digital database was reviewed to determine presence or absence of potential resources within the project site. No historic resources were identified within or adjacent to the project site.

The City of San Diego criteria for determination of historic significance, pursuant to CEQA, is evaluated based upon age (over 45 years), location, context, association with an important event, uniqueness, or structural integrity of the building. Projects requiring the demolition and/or modification of structures that are 45 years or older can result in potential impacts to a historical resource. The existing structures within the project site were constructed in 1997 and do not qualify as historic resources under the City's Historic Resource Guidelines. Therefore, the project would not result in an alteration, including the adverse physical or aesthetic effects and/or destruction of a historic building (including architecturally significant building) structure, object, or site. No impact would occur.

Issue 2: Result in a substantial adverse change in the significance of a prehistoric or historic archaeological resource, a religious or sacred site, or the disturbance of any human remains those interred outside of formal cemeteries?	☐	☐	☐	☒	☐

No cultural resources were identified in the review of the CHRIS digital database for the project. Furthermore, the project site was subject to prior disturbance during development of the existing structures on the project site. Due to the disturbed soil conditions, the site is not likely to yield inadvertent discoveries of cultural resources. There are no dedicated cemeteries or recorded burials within the project footprint or surrounding vicinity. In the unlikely event that unknown human burials are encountered during project grading and construction, they would be handled in accordance with procedures of the Public Resources Code Section 5097.98, the California Government Code Section 27491, and the Health and Safety Code Section 7050.5. These regulations detail specific procedures to follow in the event of a discovery of human remains. Therefore, the project would not result in a substantial adverse change in the significance of a prehistoric or historic archaeological resource, a religious or sacred site, or the disturbance of any human remains. No impact would occur.

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
Issue 3: Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:					
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k); or,	☐	☐	☐	☐	☒

The project would not cause a substantial adverse effect to tribal cultural resources, as there are no recorded sites listed or sites eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined by the Public Resources Code. No impact would result.

b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☐	☐	☐	☒

Tribal Cultural Resources include sites, features, places, cultural landscapes, and sacred places or objects that have cultural value or significance to a Native American Tribe. Tribal Cultural Resources include “non-unique archaeological resources” that, instead of being important for “scientific” value as a resource, can also be significant because of the sacred and/or cultural tribal value of the resource. Tribal representatives are considered experts appropriate for providing substantial evidence regarding the locations, types, and significance of tribal cultural resources within their traditionally and cultural affiliated geographic area (PRC Section 21080.3.1(a)).

In accordance with the requirements of PRC Section 21080.3.1, Assembly Bill (AB) 52, the City sent notification letters to the Native American tribes that are traditionally and culturally affiliated with the project area. No requests for project consultation were received from any of the Native American Tribes within the notification period, and therefore consultation was concluded. Therefore, no impacts would result.

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
6.9. HYDROLOGY/WATER QUALITY - Would the project:					
Issue 1: Result in flooding due to an increase in impervious surfaces or changes in absorption rates, drainage patterns, or the rate of surface runoff?	☐	☐	☐	☒	☐

A site-specific drainage study was prepared for the proposed project by Rick Engineering (Appendix E; Rick Engineering, 2021a) that evaluates the existing and proposed drainage patterns. The project site has two major drainage basins: Basin 1 encompasses the westerly and some of the northerly portions of the project site, which generally flow to the northwest via the curb gutter in Executive Way, and the curb gutter in Executive Drive. Ultimately, the street gutter flows are collected into the existing public storm drain system on the west side of the Executive Drive at the intersection with Executive Way. Basin 2 is larger and encompasses the southerly, easterly and remaining northerly portions of the project site. Flows are conveyed into the existing public storm drain in Executive Drive via an existing 18-inch RCP pipe. The remaining 0.23-acre area sheets flows into Executive Drive and flows easterly along the curb gutter. Ultimately, both existing public storm drains systems in Executive Drive discharge into the Pacific Ocean through Los Peñasquitos Creek.

The project has been designed to maintain the existing drainage patterns in the post-project condition. The Storm Water Quality Management Plan (SWQMP) prepared by Rick Engineering (Appendix F; Rick Engineering 2021b) identified four Drainage Management Areas (DMAs). Basin 1 would drain to DMA 1a and DMA 1b in the post-project condition, which would collect stormwater in an underground storm system and route it through a bio-filtration basin located on the south side of the proposed building. Some of the landscaped areas would continue to sheet flow towards Executive Way, and the northerly landscaped areas would continue to sheet flow towards Executive Drive. Ultimately, the street gutter flows would be collected into the existing public storm drain system on the west side of the Executive Drive at the intersection with Executive Way. DMA 1a and DMA 1b would drain to point of compliance (POC)-1, which would be the curb outlet along Executive Way.

Basin 2 would drain to DMA 2a and DMA 2b in the post-project condition, which would collect stormwater in the proposed underground storm drain network that would drain to the existing public storm drain in Executive Drive via the existing 18-inch RCP pipe. The remaining area would sheet flow into Executive Drive and flow easterly along the curb gutter. DMA 2a and DMA 2b would drain to POC-2, which would be the public storm drain running north along Executive Drive. DMA 3 would be located along the southern project boundary and DMA 4 would be located along the project roadway frontages. Both of these DMAs would be self-mitigating.

The hydraulic analysis conducted for the drainage study determined that peak flows during the 50-year storm event would increase by 0.41 cubic feet per second compared to the pre-project condition. The drainage study determined that this increase would be minimal and would not result in any adverse impacts to downstream drainage facilities or adjacent properties. Therefore, the project would not result in flooding due to an increase in impervious surfaces or changes in absorption rates, drainage patterns, or the rate of surface runoff, and impacts would be less than significant.

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
Issue 2: Result in a substantial increase in pollutant discharge to receiving waters and increase of identified pollutants to an already impaired water body?	☐	☐	☐	☒	☐

According to the City's Storm Water Requirements Applicability Checklist, the project is considered a Priority Development Project. Therefore, a SWQMP was prepared to identify and implement required structural BMPs (see Appendix F; Rick Engineering 2021b). The project proposes four structural BMPs (BMP-1A for DMA-1A, BMP-1B for DMA-1B, BMP-2A for DMA-2A and BMP-2B for DMA-2B) for storm water pollutant control and hydromodification management. Selection of the BMP type was performed using San Diego Storm Water Standards Figures 5-1 and 5-2. DMA-1A, DMA-1B, DMA-2A and DMA-2B would contain impervious surfaces. Therefore, the selection began at Step 1B.

After calculating the design capture volume (DCV) estimations, Step 2 was completed to determine harvest and use feasibility. Based on the land use proposed for the project site, it was determined that harvest and use would be infeasible. In Step 3, infiltration feasibility was assessed for the project based on the approved infiltration testing methods presented in Appendices C and D of the San Diego Storm Water Standards manual. The project geotechnical engineer concluded that both full and partial infiltration would be infeasible for the project. Therefore, a "no infiltration" condition was adopted for the project. In Step 4, it was determined that Biofiltration BMP-1A and 2B could be designed to treat the full DCV based on the maximum feasible footprint. Due to horizontal constraints, alternative minimum footprint sizing was used to reduce the sizing factor, and thereby the BMP bottom footprint of Biofiltration BMP-2B.

BMP-1A and BMP-2B would be biofiltration basins with pollutant control designed to comply with the hydromodification management requirements through the use of a low flow restrictor on the perforated sub-drain at the bottom of the basins and through a series of outlets set above the required DCV. Due to horizontal and vertical constraints, BMP-1B and BMP-2A were both designed as proprietary compact biofiltration BMPs (Modular Wetland Systems), which meet the appropriate performance standard. Modular Wetland Systems are flow-thru BMPs with pollutant control and don't provide the required hydromodification benefit for DMAs 1B and 2A. Therefore, biofiltration BMP-1A and BMP-2B would over detain to meet the hydromodification requirements at the POC for the project. DMA 3 and DMA 4 would be self-mitigating and would not require any site-design, pollutant control, hydromodification control, or DCV calculations. Therefore, the project would not result in a substantial increase in pollutant discharge to receiving waters and increase of identified pollutants to an already impaired water body, and impacts would be less than significant.

Issue 3: Deplete groundwater supplies, degrade groundwater quality, or interfere with groundwater recharge?	☐	☐	☐	☐	☒

The project would retain the existing public water service connections and would not use groundwater for any purpose. Although the project would increase the amount of impermeable surfaces on-site from 2.54 acres to 2.73 acres, water would continue to infiltrate through 1.17 acres of the post-construction development footprint that would remain pervious. Additionally, water would be filtered through proposed stormwater BMPs that provide pollutant control, ensuring

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact

pollutants are removed from infiltrated groundwater. Furthermore, water would continue to infiltrate through undeveloped land throughout the groundwater basin. Therefore, the project would not deplete groundwater supplies, degrade groundwater quality, or interfere with groundwater recharge. No impact would occur.

The project site is surrounded by multi-family residential uses to the east, commercial uses to the north, west, and south, and a hotel and restaurant to the south.

6.10. NOISE – Would the project: Issue 1: Result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☐	☒	☐

Noise impacts associated with construction and operation of the project are addressed in the Noise Analysis prepared by RECON (Appendix G; RECON 2021a). The following is summary of the results of the Noise Analysis.

Construction Noise

Project construction noise would be generated by diesel engine-driven construction equipment used for site preparation and grading, building construction, loading, unloading, and placing materials and paving. Construction noise would potentially result in short-term impacts to surrounding properties. The project site is surrounded by multi-family residential uses immediately to the east, commercial uses on the northern side of Executive Drive approximately 180 feet and more to the north, on the western side of Executive Way approximately 100 feet to the west and 250 feet to the southwest, and a hotel and restaurant approximately 100 feet or more to the south. The construction noise level limit at residential uses is 75 A-weighted decibels [dB(A)] one-hour equivalent noise level (L_{eq}).

As calculated in the Noise Analysis, construction noise levels are not anticipated to exceed 75 dB(A) L_{eq} at the adjacent uses. Noise levels would range from 70 to 74 dB(A) L_{eq} at the adjacent residential uses, and 63 to 65 dB(A) L_{eq} at the adjacent commercial uses. As construction activities associated with the project would comply with noise level limits from Noise Abatement and Control Ordinance Section 59.5.0404, temporary increases in noise levels from construction activities would be less than significant at the adjacent residential and commercial uses. Therefore, project construction would not generate a substantial temporary increase in ambient noise levels in the vicinity of the project in excess of standards established in the Noise Abatement and Control Ordinance, and impacts would be less than significant.

Operational On-Site Generated Noise

On-site generated noise is regulated by Section 59.5.0401 of the City's Noise Abatement and Control Ordinance. The project site is surrounded by multi-family residential uses to the east, commercial uses to the north, west, and south, and a hotel and restaurant to the south. The applicable Noise

Abatement and Control Ordinance limits between the project site and the multi-family residential uses to the east are 62.5 dB(A) L_{eq} during the daytime hours, 57.5 dB(A) L_{eq} during the evening hours, and 55 dB(A) L_{eq} during the nighttime hours. The applicable limits between the project site and the adjacent commercial, restaurant, and hotel uses to the north, west, and south are 65 dB(A) L_{eq} during the daytime hours and 60 dB(A) L_{eq} during the evening and nighttime hours. Noise generated by the on-site noise sources was modeled and compared to these Noise Abatement and Control Ordinance limits.

The primary operational noise sources on-site would be rooftop heating, ventilation, and air conditioning equipment, parking activities, and a loading dock. As calculated in the Noise Analysis, at the adjacent residential uses, daytime noise levels would range from 44 to 49 dB(A) L_{eq}, evening noise levels would range from 36 to 48 dB(A) L_{eq}, and nighttime noise levels would range from 36 to 49 dB(A) L_{eq}. Noise levels would be less than the most restrictive nighttime limit of 55 dB(A) L_{eq} for multi-family residential uses. At the adjacent commercial uses, daytime noise levels would range from 39 to 42 dB(A) L_{eq}, evening noise levels would range from 37 to 42 dB(A) L_{eq}, and nighttime noise levels would range from 32 to 41 dB(A) L_{eq}. Noise levels would be less than the most restrictive nighttime limit of 60 dB(A) L_{eq} for commercial uses. Noise levels due to on-site noise sources would not exceed the applicable Noise Abatement and Control Ordinance limits. Therefore, operational on-site sources would not generate a substantial permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the Noise Abatement and Control Ordinance, and impacts would be less than significant.

Operational Off-Site Vehicle Traffic Noise

Project operation would increase traffic volumes on local roadways. However, the project would not substantially alter the vehicle classifications mix on local or regional roadways, nor would the project alter the speed on an existing roadway or create a new roadway. Therefore, the primary factor affecting off-site noise levels would be increased traffic volumes. While changes in noise levels would occur along any roadway where project-related traffic occurs, for noise assessment purposes, noise level increases are assumed to be greatest nearest the project site, as this location would represent the greatest concentration of project-related traffic. A substantial noise increase is defined as an increase of 3 dB above existing conditions as stated in the City's CEQA significance standards (City of San Diego 2016).

The main roadways that would be affected by project traffic include La Jolla Village Drive, Town Centre Drive, Executive Drive, and Executive Way. The Noise Analysis presents a conservative assessment of traffic noise levels based on the year 2025, year 2035, and year 2050 Plus Project noise levels generated by traffic. Direct off-site noise level increases due to the project would be 1 dB or less. Therefore, operational off-site vehicle traffic would not generate a substantial permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the Noise Abatement and Control Ordinance, and impacts would be less than significant.

Similar to direct traffic noise impacts, a cumulative traffic noise impact occurs when the noise level would exceed the applicable standard and a substantial noise level increase compared to existing noise occurs. As calculated in the Noise Analysis, the total future (year 2050) with project change in noise levels compared to the year 2025 without project condition would range from 0.0 to 1.9

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact

decibel (dB). The total cumulative change in noise levels would not exceed 3 dB. Therefore, cumulative operational off-site vehicle traffic would not generate a substantial permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the Noise Abatement and Control Ordinance, and impacts would be less than significant.

Operational On-Site Noise Compatibility

The City's Noise Element of the General Plan (City of San Diego 2015a) specifies compatibility standards for different land use categories. Office uses are considered "compatible" with exterior noise levels up to 65 CNEL and "conditionally compatible" with exterior noise levels from 65 to 75 CNEL. The City's interior noise level standard for office uses is 50 CNEL. The noise section of the City's Significance Determination Thresholds for CEQA also identifies thresholds for traffic noise (City of San Diego 2016). According to these thresholds, exposure of office and professional uses to noise levels in excess of 70 CNEL would be considered a significant impact. This exterior noise level is applied at exterior usable areas. The exterior uses associated with the project include a dining terrace at the southwest building façade and a fitness terrace at the northeast building façade.

The main source of traffic noise at the project site is vehicle traffic on Executive Drive, Executive Way, La Jolla Village Drive, and Town Centre Drive. Exterior noise levels would be 60 CNEL at the dining terrace and 58 CNEL at the fitness terrace. Exterior noise levels would not exceed the significance threshold of 70 CNEL for office and professional uses; therefore, the project would be compatible with City standards and exterior noise impacts would be less than significant.

Interior noise levels can be reduced through implementation of standard construction techniques. When windows are closed, standard construction techniques provide various exterior-to-interior noise level reductions depending on the type of structure and window. According to the Federal Highway Administration's (FHWA's) Highway Traffic Noise Analysis and Abatement Guidance, buildings with masonry façades and double-glazed windows can be estimated to provide a noise level reduction of 35 dB, while light-frame structures with double-glazed windows may provide noise level reductions of 20 to 25 dB (FHWA 2011). The maximum exterior noise level at the building façade would be 68 CNEL. Assuming a minimum exterior to interior noise level reduction of 20 dB results in interior noise levels that are 48 CNEL or less. Interior noise levels would not exceed the City's standard of 50 CNEL. Therefore, the project would be compatible with the City's exterior and interior noise level standards, and impacts would be less than significant.

Issue 2: Cause the generation of, excessive groundborne vibration or groundborne noise levels?	☐	☐	☐	☒	☐

Construction activities would have the potential to result in varying degrees of temporary ground vibration, depending on the specific construction equipment used and operations involved. Ground vibration generated by construction equipment spreads through the ground and diminishes in magnitude with increases in distance. The effects of ground vibration may be imperceptible at the lowest levels, low rumbling sounds and detectable vibrations at moderate levels, and damage to nearby structures at the highest levels.

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact

Human reaction to vibration is dependent on the receiver's environment, as well as individual sensitivity. For example, vibration outdoors is rarely noticeable and generally not considered annoying. Typically, humans must be inside a structure for vibrations to become noticeable and/or annoying, as people do not perceive vibrations without vibrating structures. Based on several federal studies, the threshold of perception is 0.035 inch per second (in/sec) peak particle velocity (PPV), with 0.24 in/sec PPV being a distinctly perceptible (California Department of Transportation [Caltrans] 2013).

Project construction equipment used during site grading and excavation would have the greatest potential to generate vibrations that would affect nearby uses. Construction equipment would include equipment such as loaded trucks, excavators, dozers, and loaders. Vibration levels from these pieces of equipment would generate vibration levels with a peak particle velocity (PPV ranging from 0.035 to 0.089 PPV at 25 feet, and would be below the distinctly perceptible threshold at the adjacent residential uses. Pile driving activities that would potentially result in groundborne vibration or groundborne noise are not anticipated with construction of the project. As described in Section 6.10, Issue 1 above, potential effects from construction noise would comply with the City's Noise Ordinance. Therefore, project construction would not generate excessive groundborne vibration or groundborne noise levels, and impacts would be less than significant.

Operation of the project would not generate substantial sources of ground-borne vibration and is not anticipated to result in substantial human annoyance or structural damage. Therefore, project operation would not generate excessive groundborne vibration or groundborne noise levels, and impacts would be less than significant.

Issue 3: Be located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒	☐

MCAS Miramar is located approximately 2 miles southeast of the project site. According to the MCAS Miramar ALUCP, office land uses are compatible with noise levels up to 65 CNEL and are conditionally compatible with noise exterior noise up to 75 CNEL, provided interior noise levels are 50 CNEL or less. The project site is located at the 60 CNEL contour line. Aircraft noise levels would not exceed the compatibility level of 70 CNEL. Therefore, the project would not expose people residing or working in the project area to excessive noise levels, and impacts would be less than significant.

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
6.11. PALEONTOLOGICAL RESOURCES – Would the project: Issue 1: Result in development that requires over 1,000 cubic yards of excavation in a high resources potential geologic deposit/formation/rock unit or over 2,000 cubic yards of excavation in a high resources potential geologic deposit/formation/rock unit	☐	☐	☐	☒	☐

Borings conduced as a part of the Geotechnical Investigation determined that the project site is underlain by undocumented fill (Qudf) to depths ranging from about 3 to 5.5 feet. Undocumented fill has no potential to yield paleontological resources. Beneath the undocumented fill, the project site is underlain by Quaternary-age Very Old Paralic Deposits (Qvop) reaching a maximum depth of 20 feet. Very old Paralic Deposits has a moderate paleontological sensitivity rating. Beneath the Very Old Paralic Deposits, the project site is underlain by Stadium Conglomerate (Tst) and Scripps Formation (Tsc), both of which have a high paleontological sensitivity rating. Project grading would require 15,400 cubic yards of cut and would excavate to a maximum depth of 10 feet. Although the depth of excavation would not reach Stadium Conglomerate (Tst) and Scripps Formation (Tsc), project excavation would reach Quaternary-age Very Old Paralic Deposits (Qvop), which has a moderate paleontological sensitivity rating.

The City's CEQA Significance Determination Thresholds provides guidance for determining the potential significance of impacts to paleontological resources. Based on the City's thresholds, a significant impact to paleontological resources could occur if the proposed project would result in development that requires:

- Over 1,000 cubic yards of excavation in a high resource potential geologic deposit/ formation/rock unit; or
- Over 2,000 cubic yards of excavation in a moderate resource potential geologic deposit/ formation/rock unit.

Based on the grading volumes, depth to grading, and the underlying geologic formations, a potentially significant impact to paleontological resources could occur during grading operations. However, the City's Land Development Code (SDMC Chapter 11 through 15) provides detailed development regulations which include regulations related to grading and paleontological monitoring. SDMC Section 142.0151 requires paleontological resources monitoring in accordance with the General Grading Guidelines for Paleontological Resources in the Land Development Manual for any of the following:

1. Grading that involves 1,000 cubic yards or greater, and 10 feet or greater in depth, in a High Resource Potential Geologic Deposit/Formation/Rock Unit; or
2. Grading that involves 2,000 cubic yards or greater, and 10 feet or greater in depth, in Moderate Resource Potential Geologic Deposit/Formation/Rock Unit; or
3. Grading on a fossil recovery site or within 100 feet of the mapped location of a fossil recovery site.

If paleontological resources, as defined in the General Grading Guidelines for Paleontological Resources, are discovered during grading, notwithstanding Section 142.0151(a), all grading in the

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact

area of discovery shall cease until a qualified paleontological monitor has observed the discovery, and the discovery has been recovered in accordance with the General Grading Guidelines for Paleontological Resources. The General Grading Guidelines for Paleontological Resources are found in Appendix P of the Land Development Manual. Implementation of these SDMC requirements during grading would ensure potential impacts to paleontological resources would be reduced to less than significant.

6.12. PUBLIC SERVICES AND FACILITIES – Would the project:					
Issue 1: Promote growth patterns resulting in the need for and/or provision of new or physically altered public facilities (including police, fire-rescue, schools, libraries, parks, or other recreational facilities), the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?	☐	☐	☐	☒	☐

The project would develop an office building and parking structure consistent with the land use and zoning designations identified in the University Community Plan and the Nexus Technology Centre Specific Plan. Consequently, the project would be consistent with growth projections that were utilized to forecast demand for future public facilities. Furthermore, the project would pay Development Impact Fees prior to building permit issuance, which would be used to maintain and fund future public facilities. The project would not construct any housing that could result in an increase in population beyond what was anticipated by the University Community Plan. Therefore, the project would not promote growth patterns resulting in the need for and/or provision of new or physically altered public facilities (including police, fire-rescue, schools, libraries, parks, or other recreational facilities), the construction of which could cause significant environmental impacts, and impacts would be less than significant.

Issue 2: Increase the use of existing neighborhood and regional recreational facilitates such that substantial deterioration of the facility would occur or be accelerated?	☐	☐	☐	☐	☒

The project is limited to development of an office building and would not construct any housing that could result in an increase in population beyond what was anticipated by the University Community Plan or the Nexus Technology Centre Specific Plan. The project would be consistent with the land use and zoning designations identified in the University Community Plan and the Nexus Technology Centre Specific Plan, and therefore would be consistent with growth projections that were utilized to forecast demand for future park and recreation facilities. Therefore, the project would not increase the use of existing neighborhood and regional recreational facilitates such that substantial deterioration of the facility would occur or be accelerated. No impact would occur.

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
Issue 3: Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☐	☒

The project would develop an office building and parking structure and would not include the provision of recreational facilities or require the construction or expansion of recreational facilities. No impact would occur.

6.13. PUBLIC UTILITIES AND INFRASTRUCTURE – Would the project:

Issue 1: Use excessive amounts of water beyond projected available supplies?	☐	☐	☐	☒	☐

The 2020 City Urban Water Management Plan (UWMP) serves as the water resources planning document that assesses the current and future water supply and needs for the City. The Public Utilities Department local water supply is generated from recycled water, local surface supply, and groundwater, which accounts for approximately 20 percent of the total water requirements for the City. The City purchases water from the San Diego County Water Authority to make up the difference between total water demands and local supplies (City of San Diego 2021). Implementation of the project would not result in new or expanded water entitlements from the water service provider. The project would be consistent with the existing land use and zoning designations for the project site, and therefore would be consistent with existing water demand projections contained in the UWMP. Therefore, the project would not use excessive amounts of water beyond projected available supplies, and impacts would be less than significant.

Issue 2: Promote growth patterns resulting in the need for and/or provision of new or physically altered utilities, the construction of which could cause significant environmental impacts in order to maintain service ratios, or other performance objectives?	☐	☐	☐	☒	☐

The project consists of redevelopment of an urbanized site. All work would occur within the project parcels, would not affect any adjacent parcels, and would not result in any permanent changes to the existing land use plan. The project would utilize the existing vehicular driveway access points that are provided via Executive Drive and Executive Way and would not result in any changes to the existing circulation network. The project site is currently served by existing underground water, stormwater, and sewer lines located within Executive Drive. Infrastructure improvements would be limited to connections with these underground utility lines located within Executive Drive. Therefore, the project would not promote growth patterns resulting in the need for and/or provision of new or physically altered utilities, the construction of which could cause significant environmental impacts, and impacts would be less than significant.

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
Issue 3: Result in impacts to solid waste management, including the need for construction of new solid waste infrastructure including organics management, materials recovery facilities, and/or landfills; or result in development that would not promote the achievement of a 75 percent target for waste diversion and recycling as required under AB 341 and the City's Climate Action Plan?	☐	☐	☐	☒	☐

A Waste Management Plan (WMP) was prepared to identify the solid waste impacts that would be generated by construction and operation of the project and to identify measures to reduce those impacts (Appendix H; RECON 2021b). Table 4 presents the total waste that would be generated and diverted during the Demolition, Grading, and Construction phases of the project. Of the 26,461.7 tons estimated to be generated, 26,087.3 tons would be diverted, primarily through source separation. This would result in the diversion and reuse of 98.6 percent of the waste material generated from the project from the landfill, which would meet the City's current 75 percent waste diversion goal. Therefore, solid waste management impacts associated with project construction would be less than significant.

Table 4
Total Waste Generated, Diverted, and Disposed of by Phase

Phase	Tons Generated	Tons Diverted	Tons Disposed
Demolition	8,216.0	7,976.6	239.4
Grading/Landscape Debris	17,680.0	17,680.0	0
Construction	565.7	430.7	135.0
TOTAL	**26,461.7**	**26,087.3**	**374.4**

Operation of the project would generate approximately 223.0 tons of waste per year. Compliance with the City's Recycling Ordinance is expected to provide a minimum recycling service volume of 50 percent. Therefore, waste anticipated to be diverted during the occupancy phase would be approximately 111.5 tons per year. The remaining 111.5 tons per year would exceed the 60.0 ton per year threshold of significance for a cumulative impact on solid waste services in the city. According to the CalRecycle 2018 Facility-Based Characterization of Solid Waste in California (CalRecycle 2020), organic material accounted for approximately 36.4 percent of the franchised commercial disposed waste. Therefore, of the 111.5 tons of disposed materials anticipated after the standard 50 percent diversion rate, it is assumed that 36.4 percent of that tonnage would be organic, equal to 40.6 tons per year of organic materials. To comply with SB 1383, the project would need to demonstrate diversion of 50 percent of organic waste prior to January 1, 2025 and 75 percent thereafter. Based on implementation of new programs and mandates for recycling of food waste and the availability of organic material recycling services from franchised waste haulers, a 75 percent diversion of organic waste is anticipated. With these assumptions, the project would be consistent with regulatory requirements for 75 percent organic material diversion, providing a total organic material diversion of 30.4 tons. To reduce the potential cumulative impact on solid waste, the applicant (or applicant's successor in interest) shall be responsible for implementing the ongoing

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact

waste reduction measures documented in the WMP, which would ensure that the project meets or exceeds the requirements set forth in AB 939 and AB 341. These measures shall include recyclable collection services required by and in accordance with the City's Recycling Ordinance, as well as providing exterior storage space for refuse, recyclable materials, and a means of handling landscaping and green waste materials. Therefore, implementation of the waste reduction measures documented in the WMP would reduce solid waste management impacts associated with project operation to a level less than significant.

6.14. TRANSPORTATION – Would the project: Issue 1: Conflict with an adopted program, plan, ordinance, or policy addressing the transportation system, including transit, roadways, bicycle, and pedestrian facilities?	☐	☐	☐	☒	☐

The assessment under Section 6.14, Issue 2 below compares proposed project impacts to the transportation analysis within the Complete Communities: Housing Solutions and Mobility Choices Program EIR (City 2020). The evaluation of the proposed project's impacts is based on the VMT Assessment prepared for the project (Appendix I; Urban Systems Associates, Inc. 2022b).

Complete Communities PEIR
The Complete Communities PEIR found that the project would not conflict with adopted transportation policies, plans, and programs including those supporting transit, bicycle, and pedestrian facilities. The project incentivized the development of high-density multi-family residential development near existing transit areas. The project would support the goals of the City's General Plan, CAP, and San Diego Forward: The Regional Plan, because it supported high densities within proximity to transit. Impacts would be less than significant.

As no policy conflicts had been identified, cumulative impacts related to transportation policy would be less than significant.

Project
The project involves the replacement of the existing 30,221-square-foot San Diego Braille Institute with corporate headquarters/single tenant office uses that would be consistent with the land use designation of Industrial-Scientific Research within the University Community Plan, and zoned Industrial Park (IP-1-1) in the Nexus Technology Centre Specific Plan. The project is anticipated to generate 1,312 weekly average daily trips. This project trips would not conflict with an adopted program, plan, ordinance, or policy addressing the transportation system. Impacts would be less than significant and consistent with the findings in the Complete Communities PEIR.

Project Cumulative
As no policy conflicts had been identified for the project, cumulative impacts related to transportation policy would be less than significant.

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
Issue 2: Be located within an area on the SANDAG VMT screening maps estimated to generate resident VMT per capita greater than 85 percent of the base year regional average? For mixed-use projects with a commercial component, would the project be located within an area on SANDAG VMT screening maps estimated to generate resident VMT per capita and/or employee VMT per employee greater than 85 percent of the base year regional average?	☐	☒	☐	☐	☐

Complete Communities PEIR

The Complete Communities PEIR evaluated, among other things, adoption of the City's Complete Communities: Mobility Choices (Mobility Choices Program). The purpose of the Mobility Choices Program is to implement SB 743 by ensuring that new development mitigates transportation impacts based on VMT to the extent feasible, while incentivizing development within the City's transit priority areas (TPAs) and urban areas. The Mobility Choices Program included amendments to the City's SDMC and Land Development Manual to support implementation of the program in addition to adoption of a new CEQA significance threshold for transportation that implements SB 743. The PEIR evaluated adoption of a fee for projects in VMT-inefficient areas to mitigate VMT impacts from new development.

The Complete Communities PEIR found that implementation of the Mobility Choices Program and associated updates to the LDC to implement a new threshold for VMT impacts would not be associated with increases in per capita VMT. Rather, implementation of the Mobility Choices Program was intended to support reductions in per capita VMT by either requiring the construction of, or funding for, transportation infrastructure and amenities within Mobility Zones 1 and 2 (e.g., Downtown or in a TPA) that would encourage non-vehicular travel. The Complete Communities PEIR found that implementation of the Mobility Choices Program and the new significance thresholds for transportation impacts consistent with SB 743, would result in VMT-related impacts for any new development that occurs in an area that generates resident VMT per capita or employee VMT per employee that is greater than 85 percent of the base year regional average, absent any mitigation. While the Mobility Choices Program regulations were intended to serve as mitigation to ensure an overall reduction in Citywide VMT, the PEIR did not conclude that all potential VMT related impacts would be fully mitigated because at a program level of analysis it could not be determined with certainty whether the improvements associated with program implementation would fully mitigate VMT related impacts at the project level. Although the Mobility Choices Program is anticipated to result in the implementation of infrastructure improvements that could result in per capita VMT reductions, at a program level, the PEIR found that potentially significant VMT impacts could nonetheless remain significant because it could not be determined with certainty whether the improvements would be implemented at the time a future development project's VMT impacts could occur and whether those impacts would be mitigated to a less than significant level. The analysis for this issue was cumulative in nature, accordingly, cumulative impacts related to VMT would also be significant.

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact

Project

The project's VMT Assessment Memo (Appendix J; Urban Systems Associates, Inc. 2022b) was prepared consistent with guidance from the City of San Diego Transportation Study Manual (TSM, September 2020), which is consistent with the State of California Office of Planning and Research's (OPR's) recommendations to evaluate potential transportation impacts using a VMT metric. The City of San Diego TSM includes guidance on screening criteria, significance thresholds, analysis methodology, and mitigation.

The VMT assessment Memo evaluated whether the project would qualify under the TSM screening criteria for a Commercial Employment Project Located in a VMT Efficient Area. Based on the project's proposed use, the TSM categorizes the project as a Commercial Employment land-use type. Therefore, the project was evaluated as a Commercial Employment land use using the SANDAG current base year screening map (Series 14 ABM 2, Base Year 2016), which identifies the regional mean Employee VMT Per Employee as 27.2 miles. The project is located in Census Tract 83.39, which has an Employee VMT Per Employee value of 32.1, which is 118.0 percent of the regional average. Therefore, the project is not located within a VMT efficient area and would result in a significant VMT impact.

Since the project did not satisfy the above screening criterion, it must evaluate the VMT produced by the project. For Commercial Employment projects that are expected to generate less than 2,400 daily trips, the project's VMT per employee is considered the same as the VMT per employee of the census tract in which it is located.

The project would have an Employee VMT Per Employee similar to Census Tract 83.39 value of 32.1, which is 118.0 percent of the regional mean. Therefore, based on the significance threshold for a commercial employment project of project employee VMT per employee greater than 85 percent of the regional average, the project would have a significant VMT impact. Mitigation is required to reduce the project's VMT impact to the greatest extent feasible.

The project is required to comply with the Complete Communities: Mobility Choices ordinance (effective January 8, 2021 outside the Coastal Zone) and will rely upon the Findings and Statement of Overriding Considerations for the Complete Communities PEIR as mitigation to the extent feasible for its significant unmitigated VMT transportation impact.

SDMC Ordinance Number O-21274 provides the development regulations for the Mobility Choices portion of the Complete Communities program. As defined in SDMC Section 143.1103, a site that is located either partially or entirely within a TPA is designated as Mobility Zone 2. The project site is located entirely within an existing TPA, and therefore is designated as Mobility Zone 2.

SDMC Section 143.1103(b) requires the application of five points of VMT Reduction Measures for all development (outside the Coastal Overlay Zone) located within a site designated as Mobility Zone 2 in accordance with the measures listed in the Land Development Manual, Appendix T. These VMT Reduction Measures are listed under a series of categories including Pedestrian Measures, Bicycle Supportive Measures, Transit Supportive Measures, and Other Measures. Each individual measure is assigned a point value per unit of measure. Alternatively, SDMC Section 143.1103(b)(5) provides the

option for the applicant to pay the Active Transportation In Lieu Fee referenced in SDMC Section 143.1103(c).

Implementation of mitigation measure MM-TRA-1 would reduce VMT impacts to the extent feasible and ensure project consistency with the Complete Communities: Mobility Choices ordinance. Table 5 presents the VMT Reduction Measures that will be implemented under MM-TRA-1 and their associated point values. As shown in Table 5, the project will provide measures that add up to at least 10.5 points, which exceeds the minimum requirement of five points for development within Mobility Zone 2. Therefore, the project complies with the Mobility Choices program regulations as mitigation to the extent feasible by relying upon the Findings and Statement of Overriding Considerations from the Complete Communities: Housing Solutions and Mobility Choices Final PEIR for its significant VMT impact.

Table 5
Mobility Choices Measures

Mobility Choices Measure	Points
(S) Provide an on-site bicycle repair station	1.5
(S) Provide carpool parking spaces, at least 10% beyond minimum requirements • Carpool parking required = 42 spaces • Carpool parking provided = 63 spaces (50% more than required)	7.5
(S) Provide short-term bicycle parking spaces that are available to the public, at least 10% beyond minimum requirements. • Short-term bicycle parking required = 21 spaces • Short-term bicycle parking provided = 24 spaces	1.5
Total Points for Mobility Choices Compliance	10.5
SOURCE: Appendix J; Urban Systems Associates, Inc. 2022b.	

Issue 3: Substantially increase hazards due to a geometric design features (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?	☐	☐	☐	☒	☐

Complete Communities PEIR

The Complete Communities PEIR found that although the project did not propose specific changes to roadways, future projects implemented in accordance with the Housing Program may include transportation improvements. Additionally, transportation improvements would result from implementation of the Mobility Choices Program. Any proposed improvements to roadways or amenities such as bicycle facilities would undergo review and approval by the City Engineer. Adherence to the City standards, including the City's Street Design Manual, would ensure that a substantial increase in hazards or incompatible uses would not occur as part of the project. The project did not include any components that would result in a substantial increase in hazards due to design features or incompatible uses. Impacts would be less than significant.

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact

The Complete Communities PEIR found that cumulative impacts associated with increased hazards due to design features would be less than significant as the project would support transportation infrastructure and amenities intended to increase multi-modal accessibility and safety. Development associated with Housing Program would occur in existing Mobility Zones 1, 2, and 3. Cumulative impacts associated with hazardous geometric design features or incompatible uses would be less than significant.

Project

There would be no hazardous design features or incompatible uses introduced as a result of the project. Construction would take place within the site of the existing Braille Institute. The proposed corporate headquarters/single tenant office uses would be consistent with the site's land use designation of Industrial-Scientific Research within the University Community Plan, and zone of Industrial Park (IP-1-1) within the Nexus Technology Centre Specific Plan. The project proposes two driveways, one each along Executive Drive and Executive Way, respectively, and does not propose any improvements to the existing roadway network. The proposed driveways along Executive Drive and Executive Way will be constructed to current standards per City of San Diego Standard Drawings. Additionally, the project will remove on-street parking along Executive Drive to provide adequate sight distance for the proposed driveway. Therefore, the project would not substantially increase hazards due to a geometric design features (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment), and impacts would be less than significant, consistent with the findings in the Complete Communities PEIR.

Project Cumulative

The project would not result in a cumulative increase in roadway hazards. Rather, as described above, the project would remove existing on-street parking along Executive Drive to provide adequate sight distance for the proposed driveway. Therefore, the project would not result in cumulative impacts related to roadway hazards. Cumulative impacts would be less than significant and would be consistent with the findings in the Complete Communities PEIR.

Issue 4: Result in inadequate emergency access?	☐	☐	☐	☒	☐

Complete Communities PEIR

The Complete Communities PEIR stated that future development allowed under the proposed ordinances would be required to comply with all applicable City codes and policies related to emergency access including the California Fire Code, the San Diego Municipal Code Chapter 5, Article 5, Division 87: Appendix D – Fire Apparatus Access Roads, and City Fire Policies A-14-1 Fire Access Roadways, A-14-9 Access Roadways: Modified Roadway Surface, and A-14-10 Fire Apparatus Access Road for Existing Public Streets. The project did not include any requirements that would result in inadequate emergency access. In addition, as development would occur under the project, emergency access would be ensured by the Fire Marshal. Impacts related to emergency access would be less than significant.

The Complete Communities PEIR found that cumulative impacts associated with emergency access would be less than significant as the project would support transportation infrastructure and amenities intended to increase multi-modal accessibility and safety that would not conflict with emergency access. Development associated with Housing Program would occur in existing Mobility

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact

Zones 1, 2, and 3. Cumulative impacts associated with emergency access would be less than significant.

Project

To facilitate access to/from the project site, the project proposes two full access twenty-four-foot wide driveways, one each along Executive Drive and Executive Way, respectively, and does not propose any improvements to the existing roadway network. The proposed driveways along Executive Drive and Executive Way will be constructed to current standards per City of San Diego Standard Drawings. Therefore, the project would provide adequate emergency access. Impacts would be less than significant and would be consistent with the findings in the Complete Communities PEIR.

6.15. WILDFIRE – Would the project: Issue 1: Expose people or structures, either directly or indirectly to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒	☐

The project site is not located within a Very High Fire Hazard Severity Zone per the City's Very High Fire Hazard Severity Zone Map. The project would be required to comply with City Brush Management Regulations, Section 142.0412 of the Municipal Code, as well as the San Diego Fire-Rescue Department Fire Prevention Bureau Policy B-08-1 and the City of San Diego Fire Safety and Brush Management Guide. Therefore, the project would not expose people or structures, either directly or indirectly to a significant risk of loss, injury or death involving wildland fires, and impacts would be less than significant.

Issue 2: Due to slope, prevailing winds, and other factors, exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒	☐

The project site is relatively flat and located within an existing developed area. The project site is not located in a Very High Fire Severity Zone. The project would demolish and existing building and construct a new building that would not increase wildfire risks. The project would not exacerbate wildlife risks due to any specific site conditions or other factors. Therefore, impacts related to exposure of project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire would be less than significant.

Issue 3: Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☐	☒

Infrastructure improvements would be limited to connections with underground utility lines located within Executive Drive that would not pose a fire risk. The project would not require the installation

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact

or maintenance of associated infrastructure that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment. No impact would occur.

Issue 4: Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☐	☒

The project site and surrounding area is relatively flat and is not located within a flood inundation zone. Drainage conditions would be similar to the existing condition as described in Section 6.9. Therefore, the project would not expose people or structures to significant risks, including from downstream flooding or landslides, as a result of runoff, post-fire instability, or drainage changes. No impact would occur.

6.16. VISUAL EFFECTS AND NEIGHBORHOOD CHARACTER – Would the project:

Issue 1: Result in a substantial obstruction of a vista or scenic view from a public viewing area?	☐	☐	☐	☐	☒

Neither the University Community Plan or the Nexus Technology Centre Specific Plan identify any designated public view corridors or scenic vistas within the boundaries of the project site. Similarly, the project site is it located within an area that would impede a public view, as identified by the University Community Plan or the Nexus Technology Centre Specific Plan, which typically associates public views with visual access to open space areas from public roadways. Additionally, no scenic vistas have been identified within the surrounding area. Therefore, the project would not result in a substantial obstruction of a vista or scenic view from a public viewing area. No impact would occur.

Issue 2: Result in a substantial adverse alteration (e.g., bulk, scale, materials, or style) to the existing or planned (adopted) character of the area?	☐	☐	☐	☒	☐

The project would not result in a substantial adverse alteration to the existing or planned character of the area. The architectural design and landscaping of the proposed five-story office building would be consistent with current City Standards. Although the new structure would be taller than the existing building, the new structure would be similar in scale and height as existing surrounding developments in the area. Therefore, the project would not result in a substantial adverse alteration to the existing character of the area, and impacts would be less than significant.

Issue 3: Result in the loss of any distinctive or landmark tree(s), or stand of mature trees?	☐	☐	☐	☐	☒

All vegetation on the project site consists of ornamental landscaping. The Tree & Palm Evaluation Report prepared for the project determined that none of the trees on site are considered protected species, rare or endangered. Several street palms would be subject to protection, but they are located within City right-of-way and would not be impacted by the project (see Appendix B;

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact

Arborgate Consulting, Inc. 2021). Therefore, the project would not result in the loss of any distinctive or landmark tree(s) or stand or mature trees. No impact would occur.

Issue 4: Result in a substantial change in the existing landform?	☐	☐	☐	☒	☐

The project site does not contain any unique physical features such as a natural canyon or natural hillside slopes. Although the project would alter more than 2,000 cubic yards of earth per graded acre, the project would not meet any of the conditions that would result in a significant impact related to landform alteration. There are no steep hillsides on the project site due to the relatively flat site topography, with elevations ranging from 395 to 405 feet above mean sea level. Similarly, the project would not require mass terracing of natural slopes. Furthermore, the project would not create manufactured slopes higher than 10 feet or steeper than 2:1 (50 percent) slope gradient. Therefore, the project would not project result in a substantial change in the existing landform or loss of unique physical features, and impacts would be less than significant.

Issue 5: Create substantial light or glare which would adversely affect daytime or nighttime views in the area?	☐	☐	☐	☒	☐

The project site is currently developed with an existing facility and parking lots/hardscape. The demolition of the existing building and the subsequent construction of a new office building and associated parking structure would not create a new significant source of light compared to the existing condition. The project would comply with the outdoor lighting standards contained in Municipal Code Section 142.0740 (Outdoor Lighting Regulations) that require all outdoor lighting be installed, shielded, and adjusted so that the light is directed in a manner that minimizes negative impacts from light pollution, including trespass, glare, and to control light from falling onto surrounding properties. Therefore, lighting installed with the project would not adversely affect day or nighttime views in the area. Additionally, the project would not introduce a source of glare that could affect day or nighttime views. In order to avoid such glare impacts, exterior materials utilized for proposed structures would be limited to specific reflectivity ratings as required per Municipal Code Section 142.0730 (Glare Regulations). Therefore, the project would not create substantial light or glare which would adversely affect daytime or nighttime views in the area, and impacts would be less than significant.

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
6.17. MANDATORY FINDINGS OF SIGNIFICANCE – The lead agency shall find that a project may have a significant effect on the environment and thereby require an EIR to be prepared for the project where there is substantial evidence, in light of the whole record, that any of the following conditions may occur. Where prior to commencement of the environmental analysis a project proponent agrees to mitigation measures or project modifications that would avoid any significant effect on the environment or would mitigate the significant environmental effect, a lead agency need not prepare an EIR solely because without mitigation the environmental effects would have been significant (per Section 15065 of the State CEQA Guidelines):					
Issue 1: Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☐	☒	☐

As described in Section 6.3 above, the project would be required to comply with federal, state, and City regulations, including avoidance of impacts to nesting bird species, through implementation of measures that would be spelled out as conditions of approval for the project that would reduce potential impacts on nesting migratory birds and raptors to a level less than significant. The project does not have the potential to result in any other impacts that would substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory. As described in Section 6.8 above, the project would not impact any historical resources. Therefore, impacts would be less than significant.

Issue 2: Does the project have impacts that are individually limited but cumulatively considerable ("cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☒	☐	☐	☐

As described herein, all impacts would less than significant with the exception of VMT related impacts which would be minimized to the extent feasible, but would remain a cumulatively significant impact that was adequately addressed as part of the Complete Communities PEIR. Air quality is a regional issue and the cumulative study area for air quality impacts encompasses the SDAB as a whole. Therefore, the cumulative analysis addresses regional air quality plans and policies, such as the RAQS, as well as the project's contribution to a net increase of any criteria pollutant for which the SDAB is listed as a non-attainment area. As described in Section 6.2, Issue 1 above, the project would be consistent with the Industrial Employment General Plan designation, the Industrial/Scientific Research designation in the University Community Plan, and the Industrial Park designation in the Nexus Technology Centre Specific Plan. The project would also be consistent

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact

with the Industrial Park (IP-1-1) designation under the Nexus Technology Centre Specific Plan. Therefore, the project would be consistent with the growth assumptions of the General Plan used to develop the RAQS emissions budgets. Additionally, as discussed under Section 6.2, Issue 2 above, the project would not result in construction or operational emissions in excess of the applicable screening level thresholds for all criteria pollutants. Consequently, the project would not result in an increase in emissions that are not already accounted for in the RAQS emissions budgets. As described in Section 6.3, Issue 1 above, the project would be required to comply with federal, state, and City regulations, including avoidance of impacts to nesting bird species, through implementation of measures that would be spelled out as conditions of approval for the project that would reduce impacts on nesting migratory birds and raptors to a level less than significant. As described in Section 6.6, Issue 2 above, the project would be consistent with the City's CAP Consistency Checklist would ensure that the project's contribution of GHGs to cumulative statewide emissions would be less than cumulatively considerable. All other project impacts were determined to be less than significant, and due to the limited scope of the project, would result in less than cumulatively considerable impacts.

Issue 3:	Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☐	☒	☐

As discussed throughout this document, no hazardous conditions on the project site or in the surrounding area were identified that could adversely affect human beings. It is not anticipated that demolition or construction activities would create conditions that would significantly directly or indirectly impact human beings. Development of the project site would comply with all State and City regulations that would ensure the building is safe and designed to protect future occupants. Therefore, the project would not have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly, and impacts would be less than significant.

7. MITIGATION, MONITORING, AND REPORTING PROGRAM (MMRP) INCORPORATED INTO THE PROJECT

MM-TRA-1 **Transportation/Circulation** (Vehicle Miles Traveled)

The project shall implement the following VMT Reduction Measures which would achieve 10.5 reduction points required by the Mobility Choices Ordinance. Implementation of these measures would minimize VMT impacts to the extent feasible.

1. Provide an on-site bicycle repair station (1.5 points)

2. Provide carpool parking spaces, at least 10% beyond minimum requirements
   - Carpool parking required = 42 spaces
   - Carpool parking provided = 63 spaces (50% more than required). (7.5 points)

3. Provide short-term bicycle parking spaces that are available to the public, at least 10% beyond minimum requirements.
   - Short-term bicycle parking required = 21 spaces
   - Short-term bicycle parking provided = 24 spaces (1.5 points)

8 SUPPORTING INFORMATION SOURCES

Land Use

State of California, Department of Conservation
2016 California Important Farmland Finder. https://maps.conservation.ca.gov/dlrp/ciff/.

Air Quality

California Air Pollution Control Officers Association (CAPCOA)
2021 California Emissions Estimator model (CalEEMod). Version 2020.4.0. May 2021.

Office of Environmental Health Hazard Assessment (OEHHA)
2015 Air Toxics Hot Spots Program Guidance Manual for the Preparation of Risk Assessments (Guidance Manual), February.

RECON Environmental, Inc. (RECON)
2022a Air Quality CalEEMod Emission Calculation Output. February 11.

San Diego Association of Governments (SANDAG)
2022 Transportation Forecast Information Center. Years 2025, 2035, and 2050 Series 14 traffic volumes. Accessed at https://tfic.sandag.org/map.html. February 11.

Biology

Arborgate Consulting, Inc.
2021 Tree & Palm Evaluation Report. February 4.

San Diego, City of
2018 San Diego Municipal Code Land Development Code Biology Guidelines. https://www.sandiego.gov/sites/default/files/legacy/planning/programs/mscp/pdf/ldmbio.pdf.

Energy

California Public Utilities Commission (CPUC)
2021 Renewables Portfolio Standard Annual Report, November 2021.

Geology/Soils/Seismicity

Geocon
2021 Geotechnical Investigation, ARE – Scripps HQ Project. February 18.

Greenhouse Gas Emissions

RECON
2022b Climate Action Plan Consistency Checklist. February 17.

Hydrology/Water Quality

Rick Engineering
2021a Drainage Study, ARE – Scripps HQ Project. July 9.

2021b Storm Water Quality Management Plan, ARE – Scripps HQ Project. July 9.

Noise

California Department of Transportation (Caltrans)
2013 Technical Noise Supplement. November.

Federal Highway Administration (FHWA)
2011 Highway Traffic Noise: Analysis and Abatement Guidance. FHWA-HEP-10-025. December.

RECON
2021a Noise Analysis for the Scripps Health Headquarters Redevelopment Project, San Diego, California. Prepared for Gensler. RECON Number 9818. July 12, 2021.

San Diego, City of
2015 City of San Diego General Plan Amendments. Resolution Number R- 309817 Final Environmental Impact Report No. 104495 Addendum R-309818. Adopted by City Council on June 29.

2016 Significance Determination Thresholds for the California Environmental Quality Act (CEQA). July.

Public Utilities and Infrastructure

CalRecycle
2020 CalRecycle 2018 Facility-Based Characterization of Solid Waste in California.

RECON
2021b Waste Management Plan for the Scripps Health Headquarters Project San Diego, California. December 27, 2021.

San Diego, City of
2021 City of San Diego 2020 Urban Water Management Plan. https://www.sandiego.gov/sites/default/files/city_of_san_diego_2020_uwmp_final_6_29_2021_send.pdf.

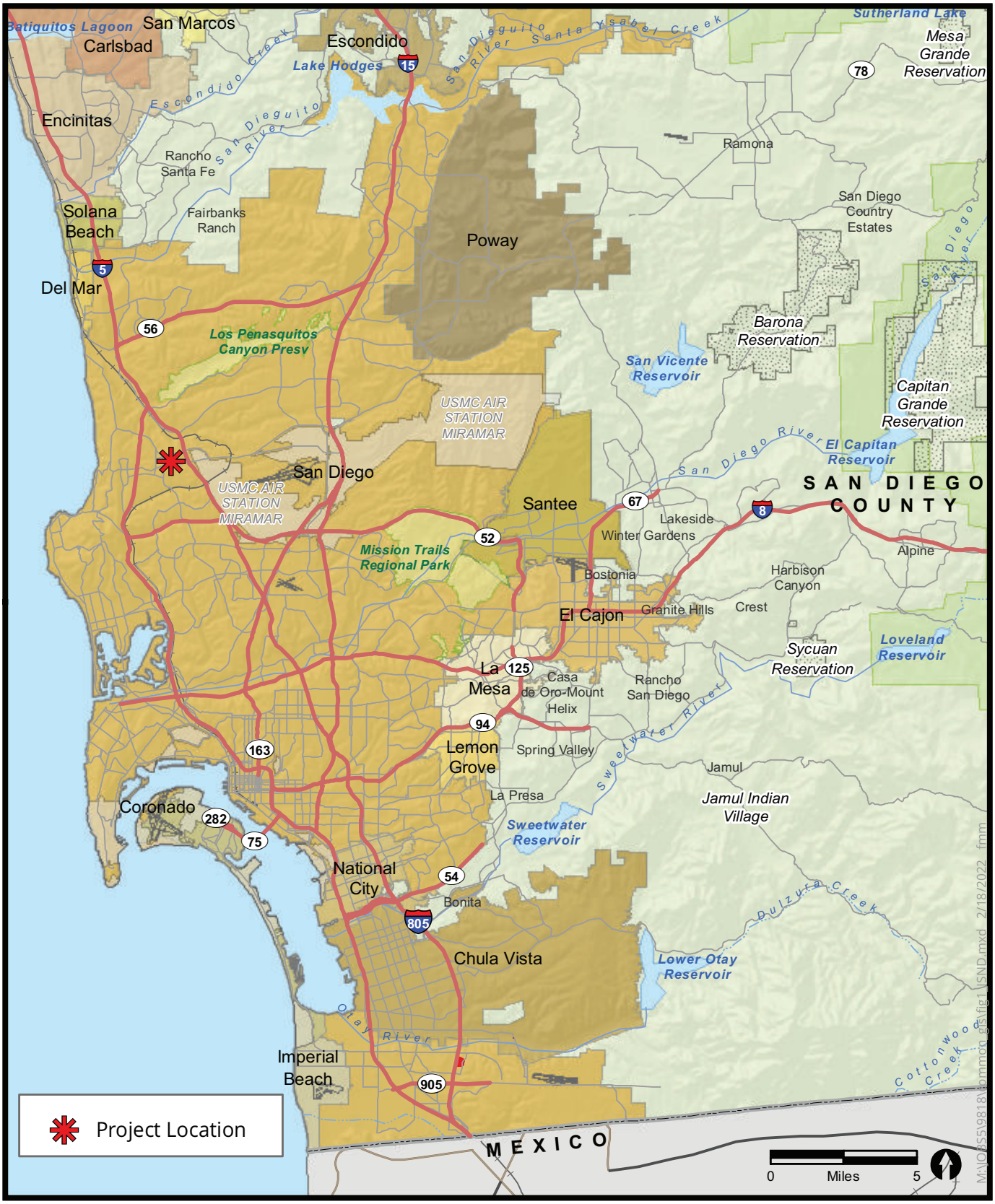
Transportation

Urban Systems Associates, Inc.
2022a ARE Scripps Health Headquarters Project Local Mobility Analysis. May 23.
2022b ARE Scripps Health Headquarters Vehicle Miles Traveled Assessment Memo. February 18.

9 LIST OF ABBREVIATED TERMS

AB	Assembly Bill
ALUCP	Airport Land Use Compatibility Plan
BMP	best management practices
CalEEMod	California Emissions Estimator Model
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CARB	California Air Resources Board
CBC	California Building Code
CEQA	California Environmental Quality Act
CHRIS	California Historic Resources Information System
City	City of San Diego
CNEL	Community noise equivalent level
CO	carbon monoxide
dB	decibel
dB(A)	A-weighted decibels
DCV	design capture volume
DMA	Drainage Management Area
DPM	diesel particulate matter
EIR	Environmental Impact Report
EO	Executive Order
EV	Electric Vehicle
FAA	Federal Aviation Administration
FAR	floor area ratio
FHWA	Federal Highway Administration
GHG	Greenhouse gas
LDC	Land Development Code
L_{eq}	one-hour equivalent noise level
MCAS	Marine Corps Air Station
MSCP	Multiple Species Conservation Plan
NDP	Neighborhood Development Permit
NOx	oxides of nitrogen
OEHHA	Office of Environmental Health Hazard Assessment
PM_{10}	10-micron particulate matter
$PM_{2.5}$	2.5-micron particulate matter
POC	point of compliance
PPV	peak particle velocity
Program EIR	Program Environmental Impact Report
R&D	Research and Development
RAQS	Regional Air Quality Strategy
RECON	RECON Environmental, Inc.
ROG	reactive organic gas
RPS	Renewables Portfolio Standard
SANDAG	San Diego Association of Governments
SB	Senate Bill
SDAB	San Diego Air Basin

SDAPCD	San Diego Air Pollution Control District
SDG&E	San Diego Gas & Electric
SDMC	San Diego Municipal Code
sf	square feet
SOx	sulfur oxides
SWQMP	Storm Water Quality Management Plan
TPA	Transit priority area
TSM	Transportation Study Manual
U.S. EPA	United States Environmental Protection Agency
UWMP	Urban Water Management Plan
VMT	Vehicle miles traveled
WMP	Waste management plan



Regional Location

Scripps Health Headquarters/Project No. 686158

City of San Diego – Development Services Department

FIGURE No. 1

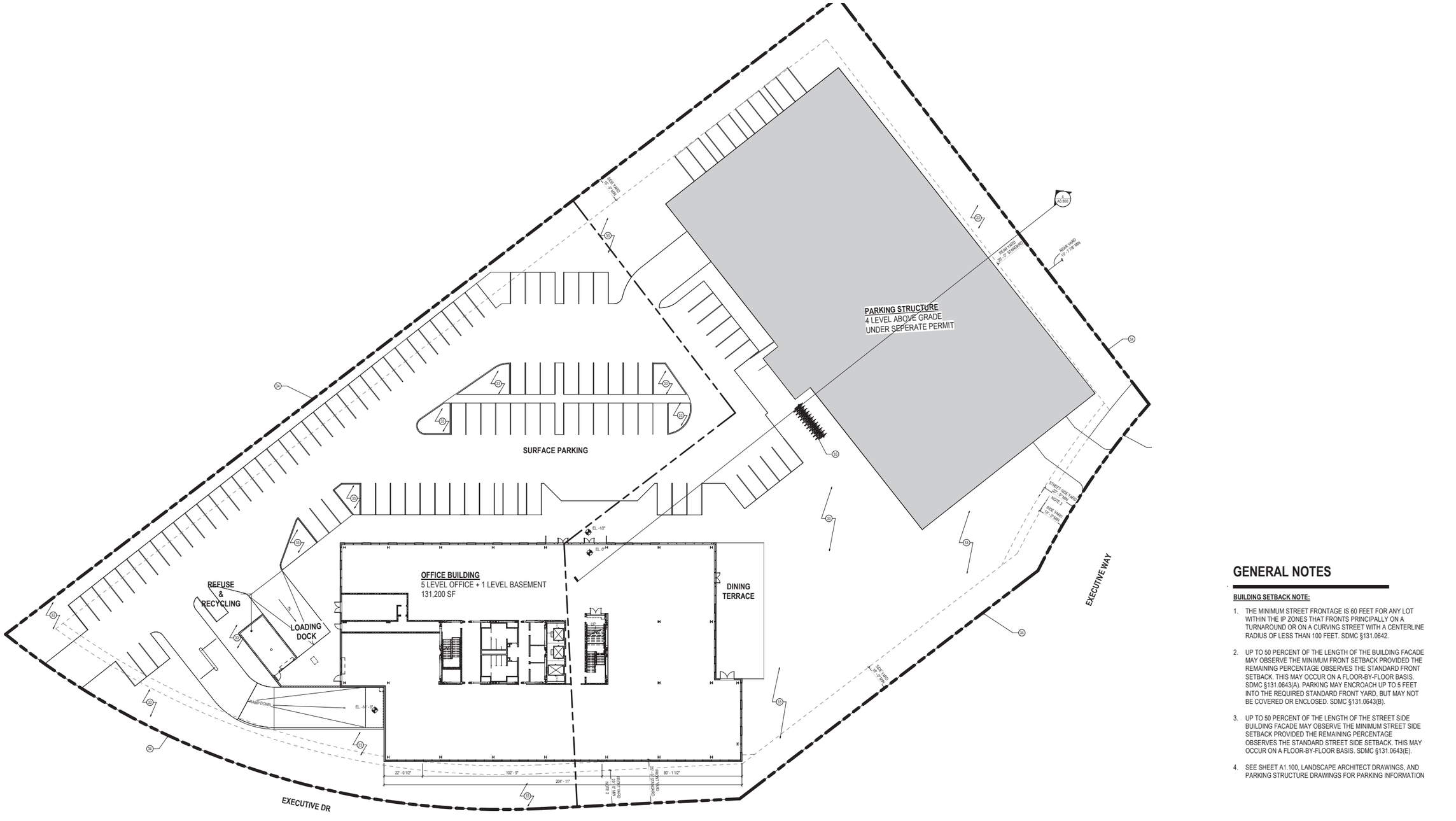
Project Location on Aerial Photograph

Scripps Health Headquarters/Project No. 686158

City of San Diego – Development Services Department

FIGURE No. 2

Map Source: Gensler (January 2021)



GENERAL NOTES

BUILDING SETBACK NOTE:

1. THE MINIMUM STREET FRONTAGE IS 60 FEET FOR ANY LOT WITHIN THE IP ZONES THAT FRONTS PRINCIPALLY ON A TURNAROUND OR ON A CURVING STREET WITH A CENTERLINE RADIUS OF LESS THAN 100 FEET. SDMC §131.0642.
2. UP TO 50 PERCENT OF THE LENGTH OF THE BUILDING FACADE MAY OBSERVE THE MINIMUM FRONT SETBACK PROVIDED THE REMAINING PERCENTAGE OBSERVES THE STANDARD FRONT SETBACK. THIS MAY OCCUR ON A FLOOR-BY-FLOOR BASIS. SDMC §131.0643(A). PARKING MAY ENCROACH UP TO 5 FEET INTO THE REQUIRED STANDARD FRONT YARD, BUT MAY NOT BE COVERED OR ENCLOSED. SDMC §131.0643(B).
3. UP TO 50 PERCENT OF THE LENGTH OF THE STREET SIDE BUILDING FACADE MAY OBSERVE THE MINIMUM STREET SIDE SETBACK PROVIDED THE REMAINING PERCENTAGE OBSERVES THE STANDARD STREET SIDE SETBACK. THIS MAY OCCUR ON A FLOOR-BY-FLOOR BASIS. SDMC §131.0643(E).
4. SEE SHEET A1.100, LANDSCAPE ARCHITECT DRAWINGS, AND PARKING STRUCTURE DRAWINGS FOR PARKING INFORMATION

Proposed Site Plan

Scripps Health Headquarters/Project No. 686158

City of San Diego – Development Services Department

FIGURE

No. 3