THE CITY OF SAN DIEGO

TIERED MITIGATED NEGATIVE DECLARATION

Project No. 691942
SCH No. 2019060003

SUBJECT: **One Alexandria North Project**: The project is requesting a COASTAL DEVELOPMENT PERMIT (CDP), SITE DEVELOPMENT PERMIT (SDP), NEIGHBORHOOD DEVELOPMENT PERMIT (NDP), and TENTATIVE PARCEL MAP (TM) for the demolition of two existing buildings, an amenity building, underground parking, tennis courts, pool, and private helistop to construct four buildings, a Central Utility Plant, and a parking structure. Building one (B1) would be 127,008-square-feet and contain lab and office space, building two (B2) would be 115,501-square-feet and contain lab and office space. Buildings three (B3) and building four (B4) would comprise the amenity space and would be 3,858-square-feet and 10,632-square-feet, respectively. The project also includes a three-level parking structure over one level of subterranean parking. Various site improvements would also be constructed that include associated hardscape and landscape. The project is requesting an allowable deviation to driveway width. The 11.4-acre project site is located at 11255-11355 North Torrey Pines Road. The site is designated Industrial-Scientific Research within the University Community Plan and zoned IP-1-1. Additionally, the project site is within the Airport Land Use Compatibility Overlay Zone (MCAS Miramar), the Airport Influence Area (MCAS Miramar-Review Area 1), the Airport Safety Zone MCAS Miramar (Accident Potential Zone 2), the Coastal Height Limitation Overlay Zone, the Coastal Overlay Zone (Appealable and Non-Appealable – 1), the Community Plan Implementation Overlay Zone (CPIOZ-B), the Very High Fire Severity Zone, the Parking Impact Overlay Zone (Beach and Campus), and Prime Industrial Lands. (LEGAL DESCRIPTION: The project area is located within an unsectioned portion of Township 14 South, Range 4 West, on the 7.5-minute Del Mar U.S. Geological Survey (USGS) topographic quadrangle.) APPLICANT: Alexandria Real Estate Equities.

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

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. 691942 and/or Environmental Document No. 691942 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:

MMRP Document Submittal/Inspection Checklist		
Issue Area	**Document Submittal**	**Associated Inspection/Approvals/Notes**
General	Consultant Qualification Letters	Prior to Preconstruction Meeting
General	Consultant Construction Monitoring Exhibits	Prior to or at Preconstruction Meeting
Land Use	Land Use Adjacency Issues CVSRs	Land Use Adjacency Issue Site Observations
Biology	Biologist Limit of Work Verification	Limit of Work Inspection
Biology	Biology Reports	Biology/Habitat Restoration Inspection
Landscape	Tree Protection Arborist Verification	Tree Protect Fence Inspection
Traffic	VMT Reports	Traffic Features Site Observation
Waste Management	Waste Management Reports	Waste Management Inspections
Bond Release	Request for Bond Release Letter	Final MMRP Inspections Prior to Bond Release Letter

C. SPECIFIC MMRP ISSUE AREA CONDITIONS/REQUIREMENTS

Biological Resources

BIO-1 Prior to the issuance of any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits, mitigation for direct impacts to 0.3 acre of Tier I southern maritime chaparral (including disturbed) shall be occur at a minimum 2:1 ratio, resulting in a total mitigation requirement of 0.6 acres. Mitigation ratios are in accordance with the City's Biology Guidelines (City 2018) and assume all mitigation will occur outside of the MHPA.

Prior to the issuance of any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits, a covenant of easement shall be recorded against the title of the property to preserve the Callan Road mitigation site in perpetuity. The project proponent shall act as the resource manager to ensure the property is managed and monitored in a manner consistent with Section 1.5 of the Preserve Management of the City's MSCP Subarea Plan and area-specific management directives.

Prior to the issuance of any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits, mitigation for impacts

to the 0.3-acre southern maritime chaparral habitat shall occur at a 2:1 ratio through the off-site preservation of 1.6 acres of existing southern maritime chaparral habitat at the Callan Road mitigation site (APN 340-010-45). Of the 1.6 acres of southern maritime chaparral, only 1.2 acres remains available for use. The remaining excess mitigation of 0.6 acre of southern maritime chaparral and 0.4 acre of Diegan coastal sage scrub shall be preserved in excess of the project's mitigation obligation and would remain unassigned and available for future mitigation opportunities, subject to City review and approval on a project-by-project basis.

BIO-2 Prior to the issuance of any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits, replacement of wart-stemmed ceanothus at a 2:1 ratio shall occur within undeveloped portions of the property. In addition, 23 wart-stemmed ceanothus shall be preserved within the 3.2-acre off-site Callan Road mitigation site.

BIO-3 The following avoidance and minimization project requirements shall be implemented and included as conditions of project approval to ensure compliance with the City's Biology Guidelines (City 2018) and MSCP Subarea Plan (City 1997), and to prevent inadvertent impacts to sensitive biological resources adjacent to the project footprint.

Prior to the issuance of any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits, the Environmental Designee shall verify that the following project requirements are shown on the construction plans:

I. Prior to Construction

A. Biologist Verification – The owner/permittee shall provide a letter to the City's Mitigation Monitoring Coordination (MMC) section stating that a Project Biologist (Qualified Biologist) as defined in the City of San Diego's Biological Guidelines (2018), has been retained to implement the project's biological monitoring program. The letter shall include the names and contact information of all persons involved in the biological monitoring of the project.

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

C. Biological Documents – The Qualified Biologist shall submit all required documentation to MMC verifying that any special mitigation reports, including but not limited to, maps, plans, surveys, survey timelines, or buffers are completed or scheduled per City Biology Guidelines, Multiple Species Conservation Program, Environmentally Sensitive Lands Ordinance, project permit conditions; California Environmental Quality Act; endangered species acts; and/or other local, state or federal requirements.

D. **Biological Construction Mitigation/Monitoring Exhibit –** The Qualified Biologist shall present a Biological Construction Mitigation/Monitoring Exhibit (BCME) which includes the biological documents in C above. In addition, it will include restoration/revegetation plans, wart-stemmed ceanothus salvage, TPZ avoidance areas, avian or other wildlife surveys/survey schedules (including general avian nesting), timing of surveys, avian construction avoidance areas/noise buffers/ barriers, other impact avoidance areas, and any subsequent requirements determined by the Qualified Biologist and the City Assistant Deputy Director (ADD)/MMC. The BCME shall include a site plan, a written and graphic depiction of the project's biological mitigation/monitoring program, and a schedule. The BCME shall be approved by MMC and referenced in the construction documents.

E. **Special Status Plant Avoidance –** Prior to the removal of vegetation, a Qualified Biologist shall conduct a pre-construction survey for special status plant species within a 20-foot buffer of all anticipated project impacts to identify the location and number of any individuals present. Construction activities shall avoid impacts to special status plant species found within the impact area to the extent feasible. If impacts to newly identified sensitive status plant species cannot be completely avoided, then efforts shall be made to trim any individual shrubs and limit root disturbance, which will allow for individuals to resprout from the base. If construction activities can avoid root disturbance, no additional mitigation would be required.

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

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

II. During Construction

A. **Monitoring –** All construction (including access/staging areas) shall be restricted to areas previously identified, proposed for development/staging, or previously disturbed as shown on "Exhibit A" and/or the BCME. The Qualified Biologist shall monitor construction activities, as needed, to ensure that construction activities

do not encroach into biologically sensitive areas, the tree protection zone, or cause other similar damage, and that the work plan has been amended to accommodate any sensitive species located during the pre-construction surveys. In addition, the Qualified Biologist shall document field activity via the Consultant Site Visit Record (CSVR). The CSVR shall be e-mailed to MMC on the 1st day of monitoring, the 1st week of each month, the last day of monitoring, and immediately in the case of any undocumented condition or discovery.

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

III. Post Construction Measures

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

Transportation/Circulation

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

Prior to first occupancy, the project shall implement the following VMT Reduction Measures which would achieve 10.0 points required by the Mobility Choices Ordinance, satisfactory to the City Engineer. Implementation of these measures would minimize VMT impacts to the extent feasible.

1. Provide short-term bicycle parking spaces that are available to the public, at least 20% beyond the minimum requirements.

    - Short-term bicycle parking required = 30 spaces
    - Short-term bicycle parking provided = 36 spaces (3.0 points)

2. Provide long-term bicycle parking spaces at least 20% beyond the minimum requirements.

    - Long-term bicycle parking required = 30 spaces
    - Long-term bicycle parking provided = 36 spaces (4.0 points)

3. Provide on-site showers/lockers at least 10% beyond the minimum requirements.

    - Showers/lockers required = 3 showers/12 lockers

- Showers/lockers provided = 8 showers/40 lockers (2.0 points)

4. Provide low cost amenities/upgraded features to an existing transit stop (above existing conditions), e.g. addition of bench, public art, static schedule with route display, or trash receptable.

    - Project will install a bus shelter, bench and trash receptacle for the existing bus stop located approximately 65 feet north of N.U. System Driveway adjacent to the project. (1.0 point)

V. PUBLIC REVIEW DISTRIBUTION:

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

Federal
MCAS Miramar Air Station (13)
U.S. Fish & Wildlife Service (23)

State
Department of Fish and Wildlife (32)
Department of Toxic Substance Control (39)
State Clearinghouse (46)
California Native American Heritage Commission (56)

City
Mayor's Office (91)
Councilmember LaCava, District 1 (MS 10A)
Development Services Department
Environmental Analysis Section
    LDR Transportation
    LDR Landscaping
    LDR Engineering
    Fire-Review
    LDR Geology
    LDR Planning
    PUD Water and Sewer Development
    Development Project Manager
Environmental Services Department
Planning Department
    Plan-Long-Range Planning
    Plan-Facilities Financing Planning
    MSCP
Parks and Recreation Department
    Park Planning
Fire-Rescue Department
San Diego Police Department
Transportation Development - DSD (78)

Development Coordination (78A)
Fire and Life Safety Services (79)
San Diego Fire – Rescue Department Logistics (80)
University City Community Branch Library (81JJ)
North University Branch Library (81JJJ)

Other Interested Organizations, Groups, and Individuals
Sierra Club (165)
Sierra Club (165A)
San Diego Natural History Museum (166)
San Diego Audubon Society (167)
Mr. Jim Peugh (167A)
California Native Plant Society (170)
Citizens Coordinate for Century 3 (179)
Endangered Habitats League (182)
Endangered Habitats League (182A)
Carmen Lucas (206)
South Coastal Information Center (210)
San Diego Archaeological Center (212)
Save Our Heritage Organization (214)
Ron Christman (215)
Clint Linton (215B)
Frank Brown – Inter-Tribal Cultural Resources Council (216)
Campo Band of Mission Indians (217)
San Diego County Archaeological Society, Inc. (218)
Kumeyaay Cultural Heritage Preservation (223)
Kumeyaay Cultural Repatriation Committee (225)
Native American Distribution (225 A-S)
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)
Friends of Rose Canyon (487)
University City Library (488)
La Jolla Village Community Council (489)
Rachel B. Hooper / Deborah L. Keeth, Shute Mihaly & Weinberger LLP (490)
Chamber of Commerce (492)
Clint Linton, Iipay Nation of Santa Ysabel
Lisa Cumper, Jamul Indian Village
John Stump
Richard Drury, Lozeau Drury LLP
Molly Greene, Lozeau Drury LLP

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.

Elizabeth Shearer Nguyen
Program Manager
Development Services Department

October 28, 2022
Date of Draft Report

Date of Final Report

Analyst: M. Dresser

Attachments:
- Initial Study
- List of Acronyms
- Figure 1: Regional Location
- Figure 2: 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 EIR, a 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 One Alexandria North 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 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: One Alexandria North Project / 691942]

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: Morgan Dresser / (619) 446-5404

2.4 Project location: 11255 and 11355 North Torrey Pines Road, La Jolla, CA 92037

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

2.6 General/Community Plan designation: Industrial Employment / Industrial

2.7 Zoning: Industrial-Park (IP-1-1)

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 approximately 11.4-acre project site is located in the University Community Plan in the city of San Diego, California (see Figure 1, *Regional Location*). The site is generally located east of the Pacific Ocean and west of Interstate 5, south of the city of Del Mar, and north of the community of La Jolla. The site is specifically located at 11255 and 11355 North Torrey Pines Road, La Jolla, CA 92037 (Accessor Parcel Numbers [APNs] 310-110-13-00 and 310-110-14-

00), west of Torrey Pines State Reserve (see Figure 2, *Aerial Photograph*). Surrounding land uses include open space to the north and east, biotechnology laboratories and offices to the south, and Torrey Pines Golf Course to the west.

The project site is currently developed with the National University - La Jolla, California Academic Headquarters. The existing property includes the 76,993 SF building at 11255 North Torrey Pines Road and its 43,958 SF underground parking garage; the 91,183 SF building at 11355 North Torrey Pines Road and its 50,628 SF underground parking garage; and the 6,905 SF amenity building. In total, 269,667 SF of building and parking garage space are present at the site. The existing site also includes tennis courts, a pool, and a private helistop.

Additionally, the project site is within the Airport Land Use Compatibility Overlay Zone (MCAS Miramar), the Airport Influence Area (MCAS Miramar-Review Area 1), the Airport Safety Zone MCAS Miramar (Accident Potential Zone 2), the Coastal Height Limitation Overlay Zone, the Coastal Overlay Zone (Appealable and Non-Appealable – 1), the Community Plan Implementation Overlay Zone (CPIOZ-B), the Very High Fire Severity Zone, the Parking Impact Overlay Zone (Beach and Campus), and Prime Industrial Lands.

There are two Conditional Use Permits (CUP) for ancillary uses recorded for the existing property. The first CUP was approved in 1980 for outdoor tennis court lighting (CUP Case No. 16506) and the second CUP was recorded in 1984 for a private helistop (CUP No. 83-0600). Additionally, the project site was subdivided and mass-graded pursuant to an unrecorded California Coastal Commission (CCC)-issued Coastal Development Permit (CDP; CDP F7919).

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 consists of a COASTAL DEVELOPMENT PERMIT, SITE DEVELOPMENT PERMIT, NEIGHBORHOOD DEVELOPMENT PERMIT, and TENTATIVE PARCEL MAP to allow for the demolition of the building and underground parking garage at 11255 North Torrey Pines Road, the building and underground parking garage at 11355 North Torrey Pines Road, and the amenity building. In total, the project would demolish approximately 269,667 SF of building and parking garage space at the site. The project would also remove the existing tennis courts, pool, and private helistop.

The project would construct four buildings (referred to as Buildings B1, B2, B3, and B4) totaling 256,499 SF of building space, in addition to a 10,755 SF Central Utility Plant and 187,355 SF parking structure, for a total of 454,609 SF. The building space would be used for research and development (R&D) with supporting amenity uses such as food and beverage, a conference center, and executive board room. The square footages of the proposed buildings are provided in Table 1, *Project Summary*.

Table 1
PROJECT SUMMARY

Building	Use	Total Building Square Footage
B1	R&D	127,008
B2	R&D	115,501
B3	R&D Amenity Village	3,358
B4	R&D Amenity Village	10,632
CUP	Central Utility Plant	10,755
P-1	Parking Structure	187,355
Total		**454,609**

Grading would entail approximately 75,000 cubic yards of cut to a depth of approximately 18 feet, with 65,000-cubic yards of export. Project grading and construction are expected to take approximately 25 months to complete.

Parking, Access, and Circulation

The following transportation components and improvements are proposed in the vicinity of the project site:

Parking

The project would provide 554 standard parking stalls and 16 Americans with Disabilities Act (ADA) accessible stalls. Out of the total 570 standard parking stalls, 59 designated clean air vehicle parking/carpool stalls would be provided in the parking structure. The project would also provide 36 long-term bicycle parking and 36 short-term bicycle racks onsite, as well as 11 motorcycle parking stalls.

Access

To facilitate access to/from the project site, the project proposes four access points via one forty five-foot wide existing signalized entry way, two thirty-foot wide existing right-in/right-out only driveways and a new thirty-foot wide right-in/right-out only driveway all along N. Torrey Pines Road. The project proposes to reconstruct the three existing project driveways to current standards per City of San Diego Standard Drawings. The reconstructed existing northernmost driveway is proposed as emergency access only driveway to provide a fire access loop at N. Torrey Pines Road on the northern parcel. The main signalized project driveway at North Torrey Pines Road and N.U. System driveway intersection will remain as full access and the remainder three driveways will operate as right-in/right-out only access. Drawings.

Utilities

The project would receive water service from the City of San Diego. Water service for the project would consist of five separate private water systems: two would be for private domestic water service, two would be for private fire protection service, and one would be

for recycled water service. The domestic water systems would be sized in accordance with the 2019 California Plumbing Code.

To accommodate the proposed development, the existing 12-inch public potable water line that traverses the site would be relocated within the project site and the existing 4-inch public potable water line within the site would be removed.

The private domestic water systems would connect to the relocated 12-inch public water line within the site. The private domestic water systems would serve the proposed buildings within the project and would consist of a master domestic water meter followed by a reduced pressure principal backflow preventer.

The private fire protection systems would connect to the relocated 12-inch public water line within the site and the existing 24-inch public transmission line in North Torrey Pines Road. Each connection would include a reduced pressure detector assembly backflow preventer. Within the project site, the private fire protection systems would supply private fire hydrants and building fire sprinkler laterals.

The onsite recycled water system would supply onsite landscape irrigation and the Central Utility Plant cooling towers would use recycled water.

All buildings would be serviced via an existing 10" public sewer main, which begins from a maintenance facility at the Torrey Pines Golf Course and continues down Torreyana Road past the project site. The section of the sewer main running through the site would be modified to accommodate the proposed buildings, removing, and replacing a portion of the sewer line.

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 requesting consultation on January 26, 2022. No requests for project consultation were received from any of the Native American Tribes within the 30-day 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 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 will mitigate any impacts of the proposed project to the extent feasible. *Complete Communities: Housing Solutions and Mobility Choices Program EIR* mitigation measures may 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 site is designated Industrial Employment per the General Plan, and is designated Industrial, and zoned IP-1-1 per the University Community Plan. The proposed research and development uses would be consistent with the land use designations and zoning. Implementation of the proposed project would not cause significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Impacts would not occur.

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 has a General Plan land use designation of Industrial Employment and Community Plan land use designation of Industrial. The project site is not designated for open space or prime farmland. The project would replace the existing office uses with research and development uses, and would not result in a physical division of a community. No impacts would occur.

Issue 3: Result in land uses which are not compatible with an adopted airport land use compatibility plan?	☐	☐	☐	☒	☐

The project is located approximately 5.4 miles northwest of the Marine Corps Air Station (MCAS) Miramar Airport. According to the Airport Land Use Compatibility Plan (ALUCP) for MCAS Miramar, the project site is located within an Air Installations Compatible Use Zone (AICUZ) Safety Zone, specifically Accident Potential Zone II (APZ II), for MCAS Miramar (San Diego County Regional Airport Authority 2011). However, project implementation would not conflict with the APZ II designation. According to the MCAS Miramar ALUCP, research and development uses are conditionally compatible in APZ II provided that the uses comply with a Floor Area Ratio (FAR) of 0.34 and do not exceed 50 people per acre.

As discussed in Section 132.1515(d) of the City's Municipal Code, an applicant may request approval of a Neighborhood Development Permit for a non-residential development where an alternative method of calculation is utilized to demonstrate compliance with the maximum intensity (people per acre). When compliance is demonstrated by an alternate method of calculation, a non-residential

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

development may exceed the maximum FAR specified in the applicable safety compatibility table if the maximum intensity limit is not exceeded. [1]

The project would utilize an alternative compliance calculation in accordance with the City's Municipal Code Section 132.1515(d). A FAR of 0.34 yields approximately 168,838 SF, by multiplying the site area by 0.34. However, the project is proposing 256,500 SF by using an equivalent load factor of 450 SF per person. Therefore, the project would be restricted to 570 employees and parking spaces to be incompliance with APZ II. As such, the project would not result in land uses which are not compatible with an adopted ALUCP. 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?	☐	☐	☐	☒	☐

HELIX Environmental Planning, Inc. conducted an Air Quality Technical Report for the proposed project (HELIX 2021). The discussion below is based on this report.

The project site is located within the San Diego Air Basin (SDAB), which is governed by the San Diego Air Pollution Control District (SDAPCD). The SDAPCD develops and administers local regulations for stationary air pollutant sources within the SDAB, and also develops plans and programs to meet attainment requirements for both federal and state ambient air quality standards (National Ambient Air Quality Standards [NAAQS] and California Ambient Air Quality Standards [CAAQS], respectively). The SDAPCD and the San Diego Association of Governments (SANDAG) are responsible for developing and implementing the clean air plan for attainment and maintenance of the Ambient Air Quality Standards (AAQS) in the SDAB. The current regional air quality plan for San Diego County is SDAPCD's 2020 Plan for Attaining the National Ambient Air Quality Standards for Ozone in San Diego County (Attainment Plan; SDAPCD 2020). The Attainment Plan, which would be a revision to the state implementation plan (SIP), outlines SDAPCD's plans and control measures designed to attain the NAAQS for ozone. These plans accommodate emissions from all sources, including natural sources, through implementation of control measures, where feasible, on stationary sources to attain the standards. Mobile sources are regulated by the U.S. Environmental Protection Agency (USEPA) and California Air Resources Board (CARB), and the emissions and reduction strategies related to mobile sources are considered in the Attainment Plan and SIP.

The SDAPCD is required, pursuant to the federal Clean Air Act (CAA), to reduce emissions of criteria pollutants for which the SDAB is in nonattainment. Strategies to achieve these emissions reductions

[1] Appendix D of the ALUCP indicates that a project may demonstrate compliance via the maximum intensity (people per acre) of a site. For the project site, the maximum intensity is 50 people per acre, utilizing 450 SF/acre as our equivalent load factor.

The total allowable GFA when using this alternative compliance and equivalent load factor is 256,500 SF, Parking is provided for the maximum number of employees, both of which are capped at 570 (per respective unit). This aligns with the 50 people per acre regulation.

The alternative calculation is as follows: Total allowable GFA = 256,500 (total number of people allowed on the project site [11.4 acres x 50 people/acre] x the equivalent load factor (450 SF/acre). Based on this calculation, the project will be able achieve a development intensity of 256,500 SF.

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

are developed in the Attainment Plan and SIP, prepared by the SDAPCD for the region. Criteria pollutants of primary concern include ozone, carbon monoxide (CO), nitrogen dioxide (NO_2), particulate matter (including both respirable particulate matter 10 microns or less in diameter [PM_{10}] and fine particulate matter 2.5 microns or less in diameter [$PM_{2.5}$]), sulfur dioxide (SO_2), and lead. The SDAB is currently designated as a basic nonattainment area for the 8-hour NAAQS for ozone. The SDAB is designated as being in attainment for all other applicable criteria pollutants under the NAAQS. The SDAB is currently classified as a nonattainment area under the CAAQS for ozone, PM_{10}, and $PM_{2.5}$. It is in attainment for CO, NO_2, SO_2, and lead relative to state air standards.

Both the Attainment Plan and SIP are based on SANDAG population projections, as well as land use designations and population projections included in general plans for cities located within the County. Population growth is typically associated with the construction of residential units or large employment centers.

Projects that propose development that is consistent with the growth anticipated by the local jurisdictions' general plans would be consistent with the Attainment Plan. In the event that a project proposes development that is less intensive than anticipated within the General Plan, the project would likewise be consistent with the Attainment Plan. If a project proposes development that is greater than that anticipated in the General Plan and SANDAG's growth projections upon which the Attainment Plan is based, the project would be in conflict with the Attainment Plan and might have a potentially significant impact on air quality. This situation would warrant further analysis to determine whether the project and the surrounding projects exceed the growth projections used in the Attainment Plan for the specific subregional area.

The project would be consistent with the General Plan and University Community Plan and would therefore not result in development that is greater than that anticipated in the General Plan or SANDAG's growth projections upon which the Attainment Plan is based. Furthermore, as detailed in Section 6.2, Issue 2, below, the project would not result in a significant air quality impact with regards to construction- and operational-related emissions of ozone precursors or criteria air pollutants. The project would also comply with existing and new rules and regulations as they are implemented by the SDAPCD, CARB, and/or USEPA related to emissions generated during construction. Impacts associated with conformance to regional air quality plans 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 project would generate criteria pollutants in the short-term during construction and the long-term during operation. The project's criteria pollutant emissions were calculated using the California Emissions Estimator Model (CalEEMod) Version 2020.4.0.

Construction Emissions

Construction of the project would result in temporary increases in air pollutant emissions. These emissions would be generated in the form of fugitive dust emissions (PM_{10} and $PM_{2.5}$) and ozone precursor emissions (nitrogen oxides [NO_X] and reactive organic gas [ROG]).

Construction emissions calculated using CalEEMod Version 2020.4.0 are provided in Appendix A of the Air Quality Technical Report prepared for the project. The results of the calculations for project construction are shown in Table 2, *Estimated Maximum Daily Construction Emissions*. The analysis assessed total annual emissions from individual construction activities, including demolition, site preparation, grading, building construction, paving, and architectural coatings. The modeling assumes implementation of standard dust control measures in accordance with SDAPCD Rule 55, including watering two times daily during grading, ensuring that all exposed surfaces maintain a minimum soil moisture of 12 percent, and limiting vehicle speeds on unpaved roads to 15 mph. The project would also comply with the requirements of SDAPCD Rule 67 by using low-VOC coatings with a content of 50 grams per liter. The quantities of coatings that would be applied to the interior and exterior of the new buildings were estimated according to CalEEMod default assumptions.

Table 2
ESTIMATED MAXIMUM DAILY CONSTRUCTION EMISSIONS

Year	Pollutant Emissions (pounds per day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Demolition – 2022	3	32	26	<0.5	4	2
Site Preparation – 2022	4	41	25	<0.5	7	4
Grading – 2023	4	50	34	<0.5	8	4
Building Construction – 2023	4	34	42	<0.5	4	2
Building Construction – 2024	4	32	42	<0.5	4	2
Paving – 2024	1	12	19	<0.5	1	1
Architectural Coatings – 2024	54	2	4	<0.5	<0.5	<0.5
Maximum Daily Emissions	**54**	**50**	**42**	**<0.5**	**8**	**4**
SDAPCD Thresholds	*75*	*250*	*550*	*250*	*100*	*55*
Significant Impact?	***No***	***No***	***No***	***No***	***No***	***No***

Source: HELIX 2021
VOC = volatile organic compound; NO_X = nitrogen oxides; CO = carbon monoxide; SO_X = sulfur oxides; PM_{10} = particulate matter 10 microns or less in diameter; $PM_{2.5}$ = particulate matter 2.5 microns or less in diameter

As shown in Table 2, emissions of all criteria pollutants and ozone precursors from project construction would be below the SDAPCD's significance thresholds. Therefore, direct impacts from criteria pollutants generated during project construction would be less than significant.

Operational Emissions

Long-term operational sources of pollutant emissions include area, energy, mobile (transportation), and stationary sources. Operational emissions from area sources include engine emissions from landscape maintenance equipment and VOC emissions from repainting of buildings and consumer

products. As previously discussed, the project would use low-VOC coatings in accordance with SDAPCD Rule 67. Energy source emissions include the combustion of natural gas for heating and hot water. The model-calculated default for natural gas usage was used for the emissions estimates.

Operational emissions from mobile sources are associated with project-generated vehicle trips. According to the Local Mobility Analysis prepared for the project by Rick Engineering Company (2021), the project would generate 2,052 average daily trips (ADT). CalEEMod default vehicle speeds, trip purpose, and trip distances were applied to the trips. Model output data sheets are included in Appendix A of the Air Quality Technical Report prepared for the project.

The project would include a backup generator that is conservatively assumed for analysis purposes to be a relatively large (500 horsepower) generator. It is further assumed that that the generator would be tested once per month for 15 minutes, for a total of 3 hours of operating time per year for routine testing. Table 3, *Estimated Net Daily Operational Emissions*, presents a summary of maximum daily operational emissions for the proposed project.

Table 3
ESTIMATED NET DAILY OPERATIONAL EMISSIONS

Category	Pollutant Emissions (pounds per day)					
	VOC	**NO_X**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
Area	8	<0.5	<0.5	0	<0.5	<0.5
Energy	<0.5	1	1	<0.5	<0.5	<0.5
Mobile	6	6	52	<0.5	11	3
Stationary	12	34	31	<0.5	2	2
Total Daily Emissions	**26**	**42**	**84**	**<0.5**	**13**	**5**
Existing Site Emissions	7	5	33	<0.5	7	2
NET DAILY EMISSIONS	**19**	**37**	**51**	**<0.5**	**6**	**3**
SDAPCD Thresholds	*75*	*250*	*550*	*250*	*100*	*55*
Significant Impact?	***No***	***No***	***No***	***No***	***No***	***No***

Source: HELIX 2021
VOC = volatile organic compound; NO_X = nitrogen oxides; CO = carbon monoxide; SO_2 = sulfur dioxide; PM_{10} = particulate matter 10 microns or less in diameter; $PM_{2.5}$ = particulate matter 2.5 microns or less in diameter

As shown in Table 3, the net increase in emissions of all criteria pollutants and ozone precursors associated with operation of the project would be below the daily thresholds. Therefore, operation of the project would not result in a significant impact on air quality.

The region is a federal and/or state nonattainment area for PM_{10}, $PM_{2.5}$, and ozone. The project would contribute particulates and the ozone precursors VOC and NO_X to the area during project construction and operation. As described above, emissions during both construction and operations would not exceed regional thresholds and would not violate an air quality standard or contribute substantially to an existing or projected air quality violation. Therefore, emissions would not be cumulatively considerable, 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: Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☐	☒	☐

Sensitive receptors (i.e., children, senior citizens, and acutely or chronically ill people) are more susceptible to the effects of air pollution than are the general population. Land uses that are considered sensitive receptors typically include residences, schools, playgrounds, childcare centers, hospitals, convalescent homes, and retirement homes. The nearest sensitive receptors to the project site are multi-family residences to the east and northeast of the site across I-5, as close as 0.7 mile from the project site. An analysis of the project's potential to expose sensitive receptors to pollutants during construction and operation is provided below.

Carbon Monoxide Hotspots

Localized air quality effects occur when emissions from vehicular traffic increase in local areas. The primary mobile source pollutant of local concern is CO, which is a direct function of vehicle idling time and, thus, traffic flow conditions. CO transport is extremely limited; it disperses rapidly with distance from the source under normal meteorological conditions. However, under certain extreme meteorological conditions, CO concentrations proximate to a congested roadway or intersection may reach unhealthful levels affecting local sensitive receptors. Typically, high CO concentrations are associated with roadways or intersections operating at unacceptable levels of service or with extremely high traffic volumes. If a project generates vehicular traffic that increases average delay at signalized intersections operating at Level of Service (LOS) E or F or causes an intersection that would operate at LOS D or better without the project to operate at LOS E of F with the project, the project could result in significant CO hotspot-related effects to sensitive receptors.

According to the Local Mobility Analysis prepared for the project (Rick Engineering Company 2022), two intersections, Genesee Avenue at the I-5 Southbound Ramps (AM peak hour) and Genesee Avenue at the I-5 Northbound ramps (PM peak hour), under the Opening Year (2023) with and without project scenario would operate at LOS E or F and would experience an increase in delay from the project (4.5 and 1.8 seconds respectively). As discussed in the Local Mobility Analysis, the project could implement mitigation in the form of updating signal timing at these intersections which would result in a decrease in delay. However, this mitigation is not recommended and to provide a conservative analysis related to CO hotspots, it is assumed that the mitigation would not be implemented. Therefore, consistent with the CO Protocol, these findings indicate that further screening is required. Although the SDAPCD has not, various air quality agencies in California have developed conservative screening methods. The screening methods of the Sacramento Metropolitan Air Quality Management District (SMAQMD) are used for this project because ambient CO concentrations within the SMAQMD jurisdiction are higher than for the project area, as measured by CARB, resulting in a more conservative analysis. The SMAQMD states that a project would not result in a significant impact to local CO concentrations if it meets all of the below criteria:

- The affected intersection carries less than 31,600 vehicles per hour;

- The project does not contribute traffic to a tunnel, parking garage, bridge underpass, urban street canyon, below-grade roadway, or other location where horizontal or vertical mixing of air would be substantially limited; and

- The affected intersection, which includes a mix of vehicle types, is not anticipated to be substantially different from the county average, as identified by EMFAC or CalEEMod models.

The traffic volumes at the affected intersections under the Opening Year (2023) With Project scenario are estimated to be the following during the highest peak hour:

1. 5,951 vehicles (AM peak hour) at Genesee Avenue and I-5 Southbound Ramps
2. 5,785 vehicles (AM peak hour) at Genesee Avenue and I-5 Northbound Ramps

These intersections are not located in a tunnel, urban canyon, or similar area that would limit the mixing of air, nor is the vehicle mix anticipated to be substantially different than the San Diego County average. There would be no potential for a CO hot spot or exceedance of State or Federal CO ambient air quality standard because the maximum traffic volumes would be substantially less than the 31,600 vehicles per hour screening level; because the congested intersections are located where mixing of air would not be limited; and because the vehicle mix would not be uncommon. Therefore, air quality impacts related to the exposure of sensitive receptors to substantial pollutant concentrations related to intersection operations would be less than significant.

Exposure to Toxic Air Contaminants

Construction

Diesel engines emit a complex mixture of air pollutants, including gaseous material and diesel particulate matter (DPM). DPM emissions would be released from the on-site construction equipment associated with the project. CARB has declared that DPM from diesel engine exhaust is a toxic air contaminant (TAC). Additionally, the Office of Environmental Health Hazard Assessment has determined that chronic exposure to DPM can cause carcinogenic and non-carcinogenic health effects. For this reason, although other pollutants would be generated, DPM would be the primary pollutant of concern.

There would be relatively few pieces of off-road, heavy-duty diesel equipment operating at a given time during project construction. Further, the project includes multiple components at different areas throughout the project site, and construction equipment would not be operating in a single location with the potential to affect a given receptor for the entire duration of project construction. As shown above in Table 2, the highest daily emission of PM_{10} (which includes equipment emissions of DPM) during construction would be approximately 8 pounds per day during the grading phase, which would be well below the 100 pounds per day significance level threshold. As discussed above in Section 6.2, Issue 1, these significance level thresholds were developed with the purpose of attaining the NAAQS and CAAQS, which identify concentrations of pollutants in the ambient air below which no adverse effects on the public health and welfare are anticipated. Combined with the highly dispersive properties of diesel PM, construction-related emissions would not expose 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

receptors to substantial emissions of TACs. Impacts from construction emissions would be less than significant.

Operation

The project, as a research and development facility, may include laboratory uses that could involve operations with the potential to lead to TAC vapor emissions; however, such operations would be performed under fume hoods that would function to capture emissions at the source, dilute the emissions in the hood, and then expel the emissions where they can disperse in the atmosphere. Use of the fume hoods would minimize TAC-related risk to both on-site and off-site receptors. As such, impacts are considered less than significant.

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

The project could produce odors during proposed construction activities from construction equipment exhaust, application of asphalt, and/or the application of architectural coatings; however, standard construction practices would minimize the odor emissions and their associated impacts. Furthermore, odors emitted during construction would be temporary, short-term, and intermittent in nature, and would cease upon the completion of the respective phase of construction, impacts would be less than significant.

During project operation, the temporary storage of refuse could be a potential source of odor; however, project-generated refuse is required to be stored in covered containers and removed at regular intervals in compliance with the City's Municipal Code solid waste regulations, thereby precluding significant odor impacts. Furthermore, the proposed project would be required to comply with the aforementioned SDAPCD Rule 51 which prohibits the discharge of odorous emissions that would create a public nuisance. As such, long-term operation of the proposed project would not create objectionable odors affecting a substantial number of people. Impacts would be less than significant.

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?	☐	☐	☒	☐	☐

HELIX Environmental Planning, Inc. conducted a Biological Technical Report for the proposed project (HELIX 2022). The discussion below is based on this report.

Vegetation Communities

The project would result in impacts to less than 0.1 acre of southern maritime chaparral, 0.3 acre of disturbed southern maritime chaparral, less than 0.1 acre of non-native vegetation, and 10.0 acres of developed area (Table 4, *Impacts to Vegetation Communities*).

Table 4
IMPACTS TO VEGETATION COMMUNITIES

Vegetation Community/Land Cover Type	Habitat Tier	Impacts (acre) [1]
Sensitive Upland Habitat		
Southern Maritime Chaparral	I	<0.1
Disturbed Southern Maritime Chaparral (37C00)	I	0.3
Sensitive Upland Habitat Total		**0.3**
Non-sensitive Upland Habitat		
Non-Native Vegetation – Italian Stone Pine	IV	<0.1
Developed (12000)[2]	VI	10.0
Non-Sensitive Upland Habitat Total		**10.0**
Total		***10.3***

[1] All impacts will occur outside of the MHPA once the Boundary Line Correction has been accepted. Acreages rounded to the nearest 0.1-acre; total reflects rounding.

No impacts will occur within the Multiple Habitat Planning Area (MHPA). All impacts to southern maritime chaparral (including disturbed) would be significant and would require mitigation. Through mitigation measure BIO-1, mitigation for impacts to the 0.3-acre southern maritime chaparral habitat would occur at a 2:1 ratio through the off-site preservation of 1.6 acres of existing southern maritime chaparral habitat at the Callan Road mitigation site (APN 340-010-45). Of the 1.6 acres of southern maritime chaparral, 1.2 acres remains available for use. The Callan Road mitigation site is located outside of the MHPA and immediately north of Callan Road and west of Torreyana Road. The Callan Road mitigation site supports Tier I southern maritime chaparral and Tier II Diegan coastal sage scrub, as well as eucalyptus woodland, disturbed habitat, and developed land. An additional 0.6 acre of southern maritime chaparral and 0.4 acre of Diegan coastal sage scrub would be preserved in excess of the project's mitigation obligation and would remain unassigned and available for future mitigation opportunities, subject to City review and approval on a project-by-project basis.

With implementation of mitigation measure BIO-1, impacts to sensitive vegetation communities would be less than significant.

Special Status Species

The proposed project has been designed to occur within existing developed and disturbed areas associated with previous development and avoid impacts to sensitive biological resources; however, portions of the proposed project footprint would impact sensitive uplands habitats where special status plant species have been documented. Project impacts on special status plant species are described below.

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

Special Status Plant Species

Three special status plant species were observed in the project site during project surveys: wart-stemmed ceanothus, Nuttall's scrub oak, and Torrey pine. These species are not federally listed, state listed, or City narrow endemic plant species. Nuttall's scrub oak has a California Rare Plant Rank (CRPR) of 1B.1. Wart-stemmed ceanothus and Torrey pine are both covered under the Multiple Species Conservation Plan (MSCP) and have a CRPR of 2B.2 CRPR 1B.2, respectively. Generally, impacts to plant species with a CRPR of 1 or 2 are considered potentially significant. Impacts to wart-stemmed ceanothus and Torrey pines are described in further detail below.

The project has been designed to avoid direct impacts to naturally-occurring Torrey pine trees, and no removals of naturally-occurring Torrey pine trees are expected. Potential impacts to naturally-occurring Torrey pine trees could occur if construction activities impact the critical root zones (CRZs) of these trees, which are defined as the ground area beneath the tree canopy. Potential impacts could occur through compaction of the CRZ; damage to critical roots through pruning, trenching, or excessive grade changes; and/or through damage to tree trunks and branches. Tree protection and general measures to avoid and minimize impacts to naturally-occurring Torrey pines would be implemented as a condition of approval.

Tree protection zones (TPZs) for each naturally-occurring Torrey pine tree on, and immediately adjacent to, the site would be established. A TPZ would help ensure that a tree is protected during construction, has enough space for root and branch growth, and would receive adequate supplies of soil nutrients, air, and water.

The proposed project would result in impacts to one wart-stemmed ceanothus individual outside of the MHPA. Wart-stemmed ceanothus within the project site are part of a larger population that occurs within the surrounding area and do not represent a geographically isolated or significant population. These species are commonly found north and east of the site within the Torrey Pines State Nature Reserve. Project impacts to individual wart-stemmed ceanothus would not jeopardize the continued viability of either species within the region, as the species will continue to persist within the project site and the surrounding preserved habitat; however, impacts to wart-stemmed ceanothus are still considered significant and require mitigation. Mitigation measure BIO-2 would ensure the impacted wart-stemmed ceanothus is replaced at a minimum 2:1 ratio. Mitigation measure BIO-3 would include pre-construction surveys, flagging of individuals, and biological monitoring, would provide additional protections for the species. Implementation of mitigation measures BIO-2 and BIO-3 would reduce impacts to a less than significant level.

Special Status Animal Species

No special status animal species were detected within the project site during project surveys; however, the project would result in impacts to sensitive uplands habitats where special status animal species have the potential to occur. Three animal species were determined to have a high potential to occur: Belding's orange whiptail, San Diego tiger whiptail, and Cooper's hawk. None of these species are federally or state listed species, or City narrow endemic species. Belding's orange-throated whiptail and Cooper's hawk are CDFW Watch List species and MSCP covered species. San

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

Diego tiger whiptail is a CDFW Species of Special Concern. Implementation of mitigation measure BIO-3 during construction activities would help to prevent potential impacts to the above-mentioned species.

The project could potentially impact Belding's orange-throated and San Diego tiger whiptail individuals through the operation of heavy equipment within and adjacent to suitable upland habitats with potential to support these species. Potential impacts to Belding's orange whiptail and San Diego tiger whiptail are considered less than significant as suitable habitat for these species would continue to be preserved within the open space parcel. Furthermore, a sufficient amount of habitat for these species has already been conserved within the surrounding area (i.e., MHPA and Torrey Pines State Nature Reserve).

Therefore, a Mitigation Monitoring Reporting Program (MMRP), as detailed within Section V of the Mitigated Negative Declaration (MND), would be required. With implementation of the monitoring program, potential impacts on biological resources would be reduced to 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?	☐	☐	☒	☐	☐

As discussed in Section 6.3, Issue 1 above, the project would result in impacts to less than 0.1 acre of southern maritime chaparral and 0.3 acre of disturbed southern maritime chaparral, which are both listed as Tier I Habitats.

Therefore, a Mitigation Monitoring Reporting Program (MMRP), as detailed within Section V of the Mitigated Negative Declaration (MND), would be required. With implementation of the monitoring program, potential impacts on biological resources would be reduced to less than significant.

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 proposed project would replace an existing academic facility with a R&D development, and no jurisdictional resources occur within the project site. No City or Coastal wetlands occur on-site or within 100 feet of the project site. Therefore, the project would not impact jurisdictional resources and would not have any impacts to wetland buffers.

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: 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?	☐	☐	☐	☒	☐

Although the majority of the site is developed, the northeastern portion of the project site is located within an MSCP Core Linkage Area that was broadly defined in 1997 as part of the MSCP. Wildlife habitat within the corridor/linkage is found along the northern and eastern portions of the project site and directly adjacent to existing habitat. The proposed project would impact 0.3 acre of native habitat along the eastern portion of the site. The project would not sever connectivity between any blocks of contiguous habitat and would not impede the movement of any native, resident, or migratory fish or wildlife species; interfere with an established native, resident, or migratory wildlife corridors, including linkages identified in the City's MSCP Subarea Plan; and would not impede the use of native wildlife nursery sites. Furthermore, the implementation of barriers (i.e., fences and walls) would not hinder wildlife movement within and adjacent to the site. Therefore, project impacts to wildlife movement and nursery sites would be considered less than 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 has been specifically designed to minimize impacts to biological resources addressed in the City's MSCP Subarea Plan (1997) and Land Development Code (2018). Several MSCP covered species, as discussed in Section 6.3, Issue 1 above, have the potential to occur adjacent to the project. Implementation of mitigation measures BIO-1 through BIO-3 would ensure project consistency with the MSCP, and that impacts to species and environmentally sensitive lands are avoided in accordance with Land Development Code requirements. The project would not conflict with the local, regional, or state conservation plans.

The project is subject to City's MHPA Land Use Adjacency Guidelines designed to minimize edge effects to sensitive resources contained in the MHPA. Compliance with the MHPA Land Use Adjacency Guidelines are a condition of project approval. 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 located adjacent to Torrey Pine Forest and southern maritime chaparral (including disturbed), which are two communities that are categorized as environmentally sensitive habitat area (ESHA). Three sensitive species, naturally-occurring Torrey pine, wart-stemmed ceanothus, and

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

Nuttall's scrub oak, occur within these communities. Torrey Pine Forest and southern maritime chaparral are both considered rare habitats and both communities are easily disturbed/degraded by human activities.

As described in Table 4, the project would result in temporary impacts to less than 0.1 acre, approximately 500 square feet, of southern maritime chaparral. As stated in the City's Biology Guidelines (City 2018), impacts to less than 0.1 acre of sensitive upland habitats would be less than significant and do not require mitigation. Regardless, impacts would be restored and revegetated as required by mitigation measure BIO-1.

The project will not conflict with the North City Local Coastal Program (LCP) or specific language in the University-La Jolla LCP Addendum related to ESHA (City 1981). Therefore, impacts would be less than significant with mitigation measure BIO-1.

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?	☐	☐	☐	☒	☐

The project would be required to meet mandatory energy standards of the current California energy code. Energy used for construction would primarily consist of fuels in the form of diesel and gasoline. Fuel consumed by construction equipment would be the primary energy resource expended over the course of construction and would include the transportation of construction materials and construction worker commutes. Heavy-duty construction equipment associated with construction activities, haul trucks involved in the removal of construction and demolition materials, and smaller support equipment (such as lighting, air compressors, and pumps) would consume petroleum-based fuel. Construction workers would travel to and from the project site throughout the duration of construction, presumably in gasoline-powered vehicles. While construction activities would consume petroleum-based fuels, consumption of such resources would be temporary and would cease upon the completion of construction.

Once operational, the project would result in research and development uses similar to the surrounding area. Operation of the project would not require a significant increase in energy usage over the existing energy demand for the existing office uses at the site. Additionally, long-term energy usage from the building would be reduced through design measures that incorporate energy conservation features in heating, ventilation and air conditioning systems, lighting and window treatments, and insulation and weather stripping. The project would also incorporate cool-roofing materials and solar panels. Activities occurring at the site would be within consistent with zoning of Industrial-Park and land use designation of Industrial Employment. Therefore, the project would not result in wasteful, inefficient, or unnecessary consumption of energy sources during project construction or operation. 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:	Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐	☐	☒

Refer to Issue 1, above. The project is consistent with the General Plan and the University Community Plan's land use designation. The project has also shown compliance with the City's Climate Action Plan (CAP).

A CAP Consistency Checklist was completed for the proposed project. Under Step 1 of the CAP Consistency Checklist, the project is consistent with the existing General Plan and Community Plan designations for the site. Therefore, the project is consistent with the growth projections and land use assumptions used in 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 such as, energy and water efficient buildings strategy, as well as bicycling, walking, transit, and land use strategy. These project features would be assured as a condition of project approval. Thus, the project is consistent with the CAP. Step 3 of the CAP Consistency Checklist would not be applicable, as the project is not proposing a land use plan amendment or a rezone. The project would therefore not conflict with the City's CAP, and no impacts would occur.

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?	☐	☐	☐	☒	☐

Geocon Incorporated conducted a Geotechnical Investigation for the proposed project (Geocon Incorporated 2021). The study included a review of geologic literature, completion of engineering analyses, soil sampling, and laboratory testing. The discussion below is based on this report and is attached to this Initial Study as Appendix D.

Seismically induced surface or ground rupture occurs when movement on a fault deep within the earth breaks through to the surface as a result of seismic activity. Fault rupture almost always follows preexisting faults, which are zones of weakness. Sudden displacements are more damaging to structures because they are accompanied by shaking. According to the Geotechnical Investigation, the project site is not located within a State of California Earthquake Fault Zone and is not underlain by active, potentially active, or inactive faults (Geocon Incorporated 2021).

While there are no known active faults that cross the project site, there are several active faults that run throughout San Diego County. There are multiple small fault lines occurring as close as 0.8 mile from the project, with the Newport-Inglewood-Rose Canyon fault zone occurring approximately 2.1 mile west of the project site. The project site is within a seismically active area and, therefore, can be subject to strong seismic ground motion.

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

Liquefaction typically occurs when a site meets the following four criteria: a site is located in a zone with seismic activity, onsite soils are cohesionless or silt/clay with low plasticity, groundwater is encountered within 50 feet of the surface, and soil densities are less than approximately 70 percent of the maximum dry densities. If the four criteria are met, a seismic event could result in a rapid pore water pressure increase from the earthquake-generated ground accelerations. According to the Geotechnical Investigation, the project site lacks permanent, near-surface groundwater and the underlying Very Old Paralic Deposits and Scripps formation are very dense (Geocon Incorporated 2021). As such, the potential for liquefaction to occur at the site is considered very low.

The Geotechnical Investigation prepared for the project did not observe evidence of previous or incipient slope instability on the eastern slopes of the project site. Areas with the potential for landslides are mapped at least 300 feet from the proposed project.

Implementation of 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. 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. Impacts would be less than significant.

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

Soil exposed by construction activities, such as grading, could be subject to erosion if exposed to heavy rain, winds, or other storm events. Construction of the proposed project would involve a variety of heavy equipment associated with intensive earthwork, structural, and paving phases. The project would be required to comply with the City's Storm Water Standards, which requires the implementation of appropriate best management practices (BMPs). Grading activities would be required to comply with the City of San Diego Grading Ordinance as well as the Storm Water Standards, which would ensure soil erosion and topsoil loss is minimized to less than significant levels. Furthermore, permanent storm water BMPs would also be required post-construction consistent with the City's regulations. Therefore, the project would not result in substantial soils erosion or loss of topsoil; therefore, 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 discussed in Section 6.5, Issue 1 above, the project would not be located in an area that is susceptible to landslides or liquefaction. Lateral spreading is defined as the lateral movement of sloping, saturated soil deposits caused by earthquake-induced liquefaction. The project site does not include significant slopes and is not susceptible to liquefaction. Therefore, impacts related to

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

lateral spreading would be less than significant. Subsidence is defined as the sink of the ground due to underground material movement, most often caused by the removal of water, oil, natural gas, or mineral resources out of the ground by pumping, fracking, or mining activities. The project would not extract underground materials, so impacts related to subsidence would be less than significant. Finally, the project would be required to comply with seismic requirements of the California Building Code and use proper engineering design and standard construction practices, which are verified at the building permit stage. These standard requirements reduce potential impacts to people or structures to an acceptable level of risk. Therefore, impacts would be less than significant.

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?	☐	☐	☐	☒	☐

According to the Geotechnical Investigation prepared for the project site, the soil encountered in the field investigation is classified as having "Very Low" and "Low" expansion potential as defined by the American Society for Testing and Materials (ASTM) D 4829 Expansion Index Test (Geocon Incorporated 2021). Therefore, impacts related to expansive soil 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 used to ensure project-by-project consistency with the underlying assumptions in the CAP and to ensure that the City would achieve the emission reduction targets identified in the CAP. The CAP Consistency Checklist includes a three-step process to determine project 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.

Under Step 1 of the CAP Consistency Checklist, the project is consistent with the existing General Plan and University Community Plan land use designations and zoning for the site. Therefore, the project is consistent with the growth projections and land use assumptions used in 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 at the project level. This includes project features consistent with the energy and water efficient buildings strategy, as well as bicycling, walking, transit, and land use strategy. These project features would be assured as a condition of project approval. Step 3 of 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

CAP Consistency Checklist would not be applicable, as the project is not proposing a land use amendment or a rezone. Thus, the project is consistent with the CAP.

Based on the project's consistency with the City's CAP Consistency Checklist, the project's contribution of GHGs to cumulative emissions would be less than cumulatively considerable. Therefore, the project's direct and cumulative GHG emissions 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?	☐	☐	☐	☒	☐

Refer to Section 6.6, Issue 1 above. The project would not conflict with the City's CAP or applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. 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?	☐	☐	☐	☒	☐

Construction activities associated with the project would require transportation and use of limited quantities of fuel, oil, sealants, and other hazardous materials related to construction. The use of hazardous materials and substances during construction would be subject to federal, state, and local health and safety requirements for handling, storage, and disposal. As a result, hazardous material impacts related to construction activities would be less than significant.

The project, as a research and development facility, include laboratory uses that could involve the use of acutely hazardous materials. However, chemicals would be located in separate containers and incompatible chemicals would be separated as specified by the International Fire Code. Materials that could involve the emission of vapors would be performed under fume hoods that would function to capture emissions at the source, dilute the emissions in the hood, and then expel the emissions where they can disperse in the atmosphere. Waste streams, if determined to be hazardous, would be organized to be disposed of as a hazardous material at a State-permitted treatment or disposal facility. The delivery and disposal of chemicals to and from the project site would occur in full accordance with all applicable federal, state, and local regulations. Therefore, the project would not create a significant hazard to the public or the environment through routine transport, use, or disposal of hazardous materials. 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 discussed above, Section 6.7, Issue 1, limited quantities of hazardous materials such as gasoline, diesel, oils, and lubricants may be required to operate the construction equipment. Construction activities would be short-term, and the use of these materials would cease once construction is complete. The hazardous substances used during construction would be required to comply with existing federal, state, and local regulations regarding the use and disposal of these materials. In the event of an accidental release during construction containment and clean up would be in accordance with existing applicable regulatory requirements.

Project operation may include the transport and use of hazardous materials onsite. However, the project would adhere to all applicable federal, state, and local regulations related to the use of hazardous materials. In the event of an accidental release during operation containment and clean up would be in accordance with existing applicable regulatory requirements. 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. 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?	☐	☐	☐	☐	☒

The proposed project is not located within one-quarter mile of an existing or proposed school. The nearest school is the Torrey Hills School, which is an elementary school located approximately 1.0 mile east of the project site. 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. No impact would occur.

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?	☐	☐	☐	☐	☒

The Department of Toxic Substances Control (DTSC) EnviroStor database was used to evaluate the project site and neither the project site nor properties within 1,000 feet are listed within it (DTSC 2022). The State Water Resources Control Board (SWRCB) GeoTracker database was also used to evaluate the project site, and neither the project site nor properties within 1,000 feet are listed within it (SWRCB 2022). Therefore, the project would not create a significant hazard to the public or

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

environment resulting from being included on a list of hazardous materials sites. 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?	☐	☐	☐	☒	☐

Refer to Section 6.1, Issue 3 above. The proposed project is located approximately 5.4 miles northwest of the MCAS Miramar Airport. According to the ALUCP for MCAS Miramar, the project site is located within an AICUZ Safety Zone, specifically Accident Potential Zone (APZ) II, for MCAS Miramar (San Diego County Regional Airport Authority 2011). However, project implementation would not conflict with the APZ II designation. According to the MCAS Miramar ALUCP, research and development uses are conditionally compatible in APZ II provided that the uses comply with a Floor Area Ratio (FAR) of 0.34 and do not exceed 50 people per acre.

As discussed in Section 132.1515(d) of the City's Municipal Code, an applicant may request approval of a Neighborhood Development Permit for a non-residential development where an alternative method of calculation is utilized to demonstrate compliance with the maximum intensity (people per acre). When compliance is demonstrated by an alternate method of calculation, a non-residential development may exceed the maximum FAR specified in the applicable safety compatibility table if the maximum intensity limit is not exceeded.

The project would utilize an alternative compliance calculation in accordance with the City's Municipal Code Section 132.1515(d). A FAR of 0.34 yields approximately 168,838 SF, by multiplying the site area by 0.34. However, the project is proposing 256,500 SF by using an equivalent load factor of 450 SF per person. Therefore, the project would be restricted to 570 employees and parking spaces to be incompliance with APZ II. As such, the project would not conflict with an ALUCP or result in a safety hazard for people residing or working at the project site. Impacts would be less than significant.

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

Access to the project site would be from three 30-foot private driveways off of North Torrey Pines Road. The project would also construct a new driveway to provide a fire access loop (emergency access only) at North Torrey Pines Road on the northern parcel. Project-related traffic would not cause a significant increase in congestion. During construction of the project, heavy construction vehicles could interfere with emergency response to the site or emergency evacuation procedures in the event of an emergency (e.g., vehicles traveling behind the slow-moving truck). However, such trips would be infrequent and temporary. As a result, the project's construction-related 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

As discussed in the Vehicle Miles Traveled (VMT) Assessment Analysis prepared for the project by Rick Engineering Company (2022), the project would generate 2,052 ADT, with 328 AM peak hour trips and 287 PM peak hour trips. By subtracting the estimated trips currently generated by the existing project site, the proposed project would result in an increase of 715 ADT over existing conditions, with an increase of 128 AM peak hour trips and 87 PM peak hour trips. This increase in trips would not result in interference with emergency response access or evacuation. The impacts related to the operation of the project would be less than significant.

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

Issue 1:	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?	☐	☐	☐	☐	☒

HELIX Environmental Planning, Inc. prepared an Archaeological Resources Report Form for the proposed project (HELIX 2021). The study included a records search, Sacred Lands File search, tribal outreach, a review of historical aerial photographs and maps, and a pedestrian survey of the project Area of Potential Effect (APE) with a Kumeyaay Native American monitor. The discussion below is based on this report and is attached to this Initial Study as Appendix E.

The records search conducted by the South Coastal Information Center (SCIC) on June 9, 2021 indicated that 42 cultural resources have been previously recorded within a half-mile of the project APE, consisting of both prehistoric and historic resources. Historic resources included residences, foundations, trash scatters, isolated artifacts, a segment of US 101, and a segment of the Atchison, Topeka, and Santa Fe Railway. Two multicomponent resources were also recorded within the search radius: one contains fire-affected rock features, prehistoric artifact scatters, and historic artifacts; the other, the Torrey Pines North Golf Course and a prehistoric artifact scatter.

Of the 42 resources previously recorded within a half-mile of the project APE, one resource (P-37-007224) was located within the project area. Resource P-37-007224 was initially recorded as a highly disturbed shell midden. However, an archaeological investigation of the resource in 1979 produced shell fragments, a faunal bone fragment, and historic plastic. Resource P-37-007224 was noted as being previously impacted and indicated that the site represented a temporary campsite or activity area rather than a long-term village or habitation site.

On June 11, 2021 a HELIX archaeologist and a Kumeyaay Native American monitor conducted a field investigation of the project site, which included intensive pedestrian survey of the APE. During the pedestrian survey, most of the ground surface within the project area was inaccessible or otherwise unviewable due to buildings, landscaped and manicured yards and flower beds, paved driveways and parking areas, and leaf and pine needle debris. What ground surface was visible consisted of cut terraces, disturbed sandstone terrace material, eroding gravel, bare areas under trees, and some rodent disturbances; these areas were thoroughly checked for cultural resources. No cultural resources were observed within the project area. Additionally, the cultural resource that was previously mapped within the project site (P-37-007224) was not observed during the field investigation due to substantial vegetation, paved driveways/roads, landscaping, a concrete pad 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

a small building, and a concrete ditch. Resource P-37-007224 may have been disturbed by the existing development.

Therefore, due to the lack of historic resources identified on the project site from the SCIC records search and field investigation, project implementation would not cause impacts to historical resources.

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 building at 11255 North Torrey Pines Road was constructed by 1981, and construction for the building at 11355 North Torrey Pines Road was completed by 1990. Therefore, 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?	☐	☐	☐	☒	☐

As stated above, the records search conducted by the SCIC indicated that 42 cultural resources have been previously recorded within a half-mile of the project APE, consisting of both prehistoric and historic resources. In general, the prehistoric resources recorded within the search radius consist of shell middens, artifact scatters, fire-affected rock features, isolated artifacts, and a habitation site. Historic resources include residences, foundations, trash scatters, isolated artifacts, a segment of U.S. Highway 101, and a segment of the Atchison, Topeka, and Santa Fe Railway. Two multicomponent resources were also recorded within the search radius: one contains fire-affected rock features, prehistoric artifact scatters, and historic artifacts; the other, the Torrey Pines North Golf Course and a prehistoric artifact scatter.

Of the 42 resources previously recorded within a half-mile of the project APE, one resource (P-37-007224) was located within the project area. Resource P-37-007224 was initially recorded as a highly disturbed shell midden, but an investigation in 1979 produced shell fragments, a faunal bone fragment, and historic plastic. However, as discussed above, resource P-37-007224 was noted as being previously impacted and indicated that the site represented a temporary campsite or activity area rather than a long-term village or habitation site. The field investigation completed by a HELIX archaeologist and a Kumeyaay Native American monitor on June 11, 2021 did not identify cultural or historic resources within the project site, including the resource that was previously recorded within the project site (P-37-007224).

HELIX contacted the Native American Heritage Commission (NAHC) on June 9, 2021, to request a search of its Sacred Lands File. Letters were sent on July 6, 2021 to the tribal contacts provided by the NAHC. The NAHC indicated in a response dated June 30, 2021, that the search of their Sacred

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

Lands File was completed for the project with negative results. A list of tribal contacts from whom additional information can be solicited was provided with the NAHC's response; letters were sent to these contacts on July 6, 2021. To date, no responses have been received.
Due to due to the lack of cultural or historic resources identified on the project site from the SCIC records search and field investigation, in addition to the negative Sacred Lands File search, project implementation would not result in a substantial adverse change in the significance of a prehistoric or historic archaeological resource.

Additionally, the project site is not located within or near a formal cemetery and is not known to be located on a burial ground. The project site is developed, and it is highly unlikely the proposed project would disturb any human remains during construction. Should human remains be uncovered during construction, the project would comply with State Health and Safety Code Section 7050.5 which a temporary construction exclusion zone to be established surrounding the area of discovery, immediate notification of the San Diego County Coroner's office, and evaluation by a forensic anthropologist. In the event that the remains are determined to be of Native American origin, the Most Likely Descendant, as identified by the Native American Heritage Commission, shall be contacted in order to determine proper treatment and disposition of the remains in accordance with California Public Resources Code section 5097.98. Therefore, impacts would be less than significant.

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,	☐	☐	☐	☐	☒

As detailed in Section 6.8, Issues 1 and 2 above, the SCIC record search indicated that 42 cultural resources have been recorded within a half-mile of the project APE, with only one resource (P-37-007224) occurring within the project site. However, no cultural resources, including resource P-37-007224, were identified during the pedestrian survey of the site completed by a HELIX archaeologist and a Kumeyaay Native American monitor on June 11, 2021. Additionally, in a response dated June 30, 2021, the NAHC indicated that the search of their Sacred Lands File was completed for the project with negative results. A list of tribal contacts from whom additional information can be solicited was provided with the NAHC's response; letters were sent to these contacts on July 6, 2021. To date, no responses have been received. Therefore, the project would not cause a substantial adverse change in the significance of a tribal cultural resource. 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
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.	☐	☐	☐	☐	☒

Refer to Section 6.8, Issue 3a above. The project would not cause a substantial adverse change in the significance of a tribal cultural resource. No impact would occur.

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?	☐	☐	☐	☒	☐

Rick Engineering Company conducted a Drainage Study (2022) and Storm Water Quality Management Plan (SWQMP; 2021) for the proposed project. The discussion below is based on these reports, which are attached to this Initial Study as Appendix F and Appendix G, respectively.

The project would occur generally within the footprint of the existing developed portion of the site. As discussed in the Drainage Study prepared for the project, the drainage characteristics would remain similar to existing conditions. However, the imperviousness of Basin 100 would increase from 66 percent to 71 percent with project implementation, resulting in an increase of 0.1 cubic feet per second (CFS) in peak flow, which is considered negligible. For Basin 200, imperviousness would increase from 39 percent to 56 percent with the project. This would result in a 2.2 CFS increase in peak flow compared to existing conditions. Lastly, peak flow from Basin 300 will increase 0.2 CFS. Therefore, the project would incorporate detention for the 100-year 6-hour storm event via an underground detention vault in Basin 200 which would attenuate the peak flow to existing conditions. The drainage boundaries in Basin 300 would be preserved, resulting in no increase in peak flow (Rick Engineering Company 2022). Through project design, the project's peak flows are no greater than pre project conditions. Additionally, a Stormwater Pollution Prevention Plan (SWPPP) would be prepared in compliance with the Construction General Permit. The SWPPP would identify erosion control and sediment control best management practices (BMPs) that would be implemented to minimize the occurrence of soil erosion. Therefore, the project would not substantially increase impervious surfaces, absorption rates, or the rate of surface runoff.

The project is a Priority Development Project (PDP) and, therefore, a SWQMP has been prepared (Rick Engineering Company 2021). The PDP SWQMP includes construction and post-construction BMPs in compliance with the City and Regional Water Quality Control Board (RWQCB) regulations such as low-impact development (LID) design practices which include source control and

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

hydromodification designs. Implementation of these LID BMPs under the PDP SWQMP would preclude any potential violations of applicable standards and discharge violations.

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. Impacts would be less than significant.

Issue 2:	Result in a substantial increase in pollutant discharge to receiving waters and increase of identified pollutants to an already impaired water body?	☐	☐	☐	☒	☐

Refer to the discussion under Section 6.9, Issue 1 above. The project would not result in significant runoff through the incorporation of an underground detention vault. A SWPPP would be prepared in compliance with the Construction General Permit, which would identify erosion control and sediment control BMPs that would be implemented to minimize the occurrence of soil erosion. A PDP SWQMP has also been prepared for the project which includes construction and post-construction BMPs such as source control and hydromodification designs, which would prevent pollutant discharge to receiving waters. 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. Impacts would be less than significant.

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

There is no groundwater extraction occurring or planned at the project site; therefore, there would be no disruption to any existing groundwater levels or well production. In relation to impervious surfaces that could interfere with groundwater recharge, the project would occur generally within the footprint of the existing developed portion of the site. Additionally, as discussed in the Drainage Study prepared for the project, the project would incorporate an underground detention vault in Basin 200 to attenuate the 100-year 6-hour storm event peak flow to pre-project conditions. The two other basins would experience a negligible increase in peak flow with project implementation (Rick Engineering Company 2021a). Therefore, the project would not result in flows that may interfere with groundwater quality. Impacts related to groundwater would be less than significant.

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?	☐	☐	☐	☒	☐

Project implementation would generate noise during both construction and operation. As specified in Chapter 5, Section 59.5.0404 of the San Diego Municipal Code, construction activity that would create disturbing, excessive, or offensive noise is prohibited between the hours of 7:00 p.m. of any

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

day and 7:00 a.m. of the following day, or on legal holidays specified in Section 21.04 of the San Diego Municipal Code with exception of Columbus Day and Washington's Birthday, or on Sundays. A significant construction noise impact would occur if temporary construction noise exceeds 75 A-weighted decibels (dBA) equivalent continuous sound level (L_{EQ}) at a noise-sensitive land use.

The nearest noise sensitive land use (hotel) to the project site property line is greater than 1,500 feet to the southwest. The loudest piece of construction equipment would be a breaker (if used) that has noise level of 90 dBA maximum reference noise level (L_{MAX}) at 50 feet. Based on a source-to-receiver sound attenuation factor of approximately six dB per doubling of distance, project construction would not exceed the 75 dBA threshold at the closest noise sensitive land use. Therefore, construction activities would comply with the San Diego Municipal Code.

The City Noise Ordinance (San Diego Municipal Code Section 59.5.0401) also sets limits for operational noise generation, as measured at the property line. For the project's land use, the applicable noise standard would be 75 dBA L_{EQ}. Operational noise would be similar to the existing uses and include heating, ventilation, and air conditioning (HVAC) units.

Additionally, vehicle related noise would occur from employee and delivery truck trips. To generate a noticeable increase in noise levels, traffic volumes generated by a project would generally have to double existing conditions. Given that the project would result in a minimal increase in trips over existing conditions, traffic volumes associated with the project would not sufficiently raise the volume of traffic to create a significant change in noise levels. Therefore, the project would not result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of established standards. Impacts would be less than significant.

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

Excessive ground-borne vibration would occur if construction-related ground-borne vibration exceeds the "strongly perceptible" vibration annoyance potential criteria criterion for human receptors of 0.1 inch per second peak particle velocity (PPV) or the damage potential criteria criterion to relatively old residential structures 0.5 inch per second PPV for continuous/frequent intermittent construction sources (such as impact pile drivers, vibratory pile drivers, and vibratory compaction equipment), as specified by Caltrans (2020). A possible source of vibration during general project construction activities would be a vibratory roller, which may be used for compaction of soil beneath building foundations and could be used within 1,500 feet of the nearest hotel and 3,600 feet of the nearest off-site residences. A vibratory roller would create approximately 0.210 inch per second PPV at a distance of 25 feet (Caltrans 2020). A 0.210 inch per second PPV vibration level would equal 0.002 inch per second PPV at a distance of 1,500 feet.[2] This would be much lower than the structural damage impact to older structures of 0.5 inch per second PPV and the "strongly perceptible" impact for humans of 0.1 inch per second PPV. Additionally, off-site exposure to such ground-borne vibration would be temporary as it would be limited to the short-

[2] Equipment PPV = Reference PPV * $(25/D)^n$ (inches per second), where Reference PPV is PPV at 25 feet, D is distance from equipment to the receiver in feet, and n = 1.1 (the value related to the attenuation rate through the ground); formula from Caltrans 2013.

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

term construction period. Therefore, even though vibration may be perceptible at nearby residences, temporary impacts associated with the roller (and other potential equipment) would be less than significant. As a research and development land use, the project would not generate excessive ground-borne vibration during operations. As such, impacts related to groundborne vibration 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?	☐	☐	☐	☒	☐

The proposed project is located approximately 5.4 miles northwest of the MCAS Miramar Airport. Although the project is located within APZ II for MCAS Miramar, the project site is not located within the MCAS Miramar noise contours provided in the ALUCP (San Diego County Regional Airport Authority 2011). Therefore, the project occupants would not be exposed to significant noise levels related to an airport. Impacts would be less than significant.

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	☐	☐	☐	☒	☐

According to the Geotechnical Investigation prepared for the project, the project site is underlain with undocumented fill, Very Old Paralic Deposits (formerly known as the Lindavista Formation), the Scripps Formation, and Ardath Shale (Geocon Incorporated 2021). The potential for paleontological resources in undocumented fill is extremely low. The Very Old Paralic Deposits represent a marine and/or non-marine terrace deposit. Fossils are rare in the Very Old Paralic Deposits and is recognized as having a moderate resource sensitivity in most areas of San Diego, including the project site. The Scripps Formation is considered to be potentially fossiliferous in most locations. Most of the fossils known from this formation consist of remains of marine organisms (i.e., bony fishes, sharks, rays, etc.) and land mammals (i.e., uintathere, brontothere, rhinoceros, and artiodactyl). Therefore, the Scripps Formation is recognized as having a high paleontological resource sensitivity. The Ardath Shale has yielded diverse and well-preserved assemblages of marine microfossils, macroinvertebrates, and vertebrates. As such, the Ardath Shale is also recognized as having a high paleontological resource sensitivity. The project is anticipated to involve 106,000 cubic yards of soil during excavation which may result in a significant impact to paleontological resources during construction. However, in accordance with San Diego Municipal Code Section 142.0151 (Paleontological Resources Requirements for Grading Activities), the project would require paleontological monitoring during grading and/or excavation activities as outlined in the City's Land Development Manual Appendix P, General Grading Guidelines for Paleontological

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

Resources. Adherence to Section 142.0151 of the San Diego Municipal Code would reduce impacts to a less than significant level.

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 City of San Diego Police Department provides police services for the project site, and the City of San Diego Fire-Rescue Department provides fire-rescue services for the project site. The proposed project would not change existing demand for police or fire protection services because operation of the project would not result in a substantial increase in employees or population. The project would replace the existing office uses with research and development uses and supporting amenities that are consistent with the site's zoning of Industrial-Park and land use designation of Industrial Employment. Therefore, the project would not substantially increase the need for new police or fire department staff or facilities. Additionally, the project would not introduce inhabitants to the project area that would require additional schools, parks, or other recreational facilities. 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 proposed project involves the replacement of existing office uses with research and development uses and supporting amenities. The project would not introduce inhabitants or visitors that would use existing recreational facilities or create the need for new facilities. The proposed project would not result in physical deterioration of an existing open space area or any recreation facilities. Therefore, no impacts would occur.

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 proposed project does not involve or require the construction or expansion of recreational facilities. Therefore, 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
6.13. PUBLIC UTILITIES AND INFRASTRUCTURE – Would the project:					
Issue 1: Use excessive amounts of water beyond projected available supplies?	☐	☐	☐	☒	☐

Dexter Wilson Engineering conducted a Water System Analysis for the proposed project (Dexter Wilson Engineering 2021). The discussion below is based on this report and is attached to this Initial Study as Appendix H.

Water service to the project would be provided by the City of San Diego North City 610 Pressure Zone public water system. Water service within the project would consist of five separate private water systems: two for private domestic water service, two for private fire protection service, and one for recycled water service. With project implementation, the existing 12-inch public potable water line would be relocated through the site and a 4-inch public potable water line would be removed. The project involves the replacement of the existing office uses with research and development uses, consistent with the project's land use designation of Industrial Employment and zoning of Industrial-Park. The project would not result in a population increase or significant increase in water usage at the site over existing conditions. The onsite recycled water system would supply onsite landscape irrigation and the Central Utility Plant cooling towers would use recycled water.

Therefore, the project would not use excessive amounts of water beyond projected available supplies. 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 discussion below is based on the Water System Analysis (Dexter Wilson Engineering 2021), Sewer Study (Rick Engineering Company 2021), and Waste Management Plan (WMP; HELIX 2022) prepared for the proposed project. The reports are attached to this Initial Study as Appendix H, Appendix I, and Appendix J, respectively.

The project involves the replacement of the existing office uses with research and development uses, consistent with the project's land use designation of Industrial Employment and zoning of Industrial-Park. The project does not include the construction of residences and would not directly or indirectly result in a population increase that would create the need for new or physically altered utilities. As discussed under Section 6.13, Issue 1 above, there are sufficient water supplies to support the proposed project. As discussed in the Sewer Study, the flow rate would increase from 42.68 gallons per minute (gpm) to 59.46 gpm with project implementation. The depth of flow to pipe diameter ratio would increase from 0.13 under existing conditions to 0.15 under proposed conditions, resulting in an increase of 0.02. Therefore, according to the Sewer Study, the existing sewer lateral has enough capacity to serve the proposed project without any negative impacts to the public sewer system.

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

As discussed under Section 6.13, Issue 3 below, the project would generate waste during pre-construction, construction, and operation. However, the project would not generate excessive amounts of waste that would require the need for new or physically altered waste disposal facilities. The project would also provide at least 1,746-square feet of trash and recycling storage space, per the City Storage Ordinance. Furthermore, the project would be required to comply with the City's Municipal Code (including the Refuse and Recyclable Materials Storage Regulations (Municipal Code Chapter 14, Article 2, Division 8), Recycling Ordinance (Municipal Code Chapter 6, Article 6, Division 7), and the Construction and Demolition (C&D) Debris Deposit Ordinance (Municipal Code Chapter 6, Article 6, Division 6)) for diversion of both construction waste during the demolition phase and solid waste during the long-term, operational phase. Additionally, the project would provide adequate organic waste disposal space once regulations are adopted by the City.

The project would not promote growth patterns resulting in the need for new or physically altered utilities. Impacts would be less than significant.

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?	☐	☐	☐	☒	☐

HELIX Environmental Planning, Inc. conducted a WMP for the proposed project (HELIX 2022). The discussion below is based on this report and is attached to this Initial Study as Appendix J.

During pre-construction demolition, clearing/grubbing, and grading, the project would produce 164,621 tons of excavated soils, green waste, asphalt/concrete, and other construction and demolition (C&D) waste, and divert 157,360 tons of these materials from the landfill. Approximately 7,261 tons of solid waste material generated during pre-construction is anticipated to be disposed of as non-recyclable/non-reusable waste at the Sycamore Landfill, for an overall pre-construction diversion rate of 96 percent.

During construction, the project would produce approximately 477 tons of solid waste (metal, concrete, concrete/steel, asphalt, brick/masonry, wood, drywall, carpet/carpet padding, mixed debris, and trash), and divert approximately 390 tons of solid waste materials from the landfill. The diverted material would consist of clean, source-separated (segregated) recyclable and/or reusable material, as well as mixed debris, to be deposited at the recycling/reuse facilities identified in the City's Certified C&D Recycling Facility Directory (City 2021). Approximately 97 tons of solid waste material generated during construction is anticipated to be disposed of as non-recyclable/non-reusable waste at the Sycamore Landfill, for an overall diversion rate during construction of approximately 83 percent.

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 combined pre-construction and construction phases, the project would produce 165,179 tons of solid waste and would divert 157,821 tons. This would be an overall diversion rate during pre-construction and construction of 96 percent. Therefore, the project would exceed the C&D diversion threshold of 75 tons in Assembly Bill (AB) 341.

During occupancy, it has been estimated that the project would generate an additional 217 tons of waste per year over existing conditions. Using an estimated 50-percent diversion rate, which is based on compliance with SB 1383, an additional approximately 109 tons per year are calculated to be diverted to recycling/reuse facilities (in comparison to existing conditions). An additional estimated 109 tons per year, or 50 percent of occupancy material generated, are projected to be disposed of as non-recyclable/non-reusable waste at the Sycamore Landfill (in comparison to existing conditions). The project would also be required to comply with the forthcoming changes in organic waste diversion pursuant to SB 1383, which requires diversion of a minimum of 50 percent of organic waste generated on site, and a minimum of 75 percent of organic waste generated on site by 2025. To assist in achieving this goal, as a condition of approval, project tenants, operators, and/or future owners shall subscribe to a City-certified organic waste collection service that either "source-separates" the waste (e.g., separate bins), or transports all unsegregated waste to a facility that recovers 75 percent of the organic content collected from the system. Additionally, organic waste generated by the project's routine landscaping would be diverted from the landfill. Thus, the project is expected to achieve a waste diversion rate of greater than 50 percent overall. Additional waste reduction, recycling, and diversion measures, specified in the WMP, would further reduce the project's operational waste disposal. Regarding trash and recycling storage space during operation, for the proposed buildings, the project would provide at least 1,746-square feet of trash and recycling storage space, per the City Storage Ordinance. The project would comply with the City Recycling Ordinance by providing adequate space, bins, and educational materials for recycling during occupancy. Additionally, the project would provide adequate organic waste disposal space once regulations are adopted by the City. Therefore, the project's impacts related to solid waste would be 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 below compares proposed project impacts to the transportation analysis within the Complete Communities: Housing Solutions and Mobility Choices Program PEIR (City 2020). The analysis of the proposed project's impacts is based on the VMT Assessment (Rick Engineering Company 2022) prepared for the project.

Complete Communities PEIR

The Complete Communities PEIR found that the Complete Communities project would not conflict with adopted transportation policies, plans, and programs including those supporting transit,

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

bicycle, and pedestrian facilities. The project incentivized the development of high-density multi-family residential development near existing transit areas. The Complete Communities 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 existing office uses with research and development uses that would be consistent with the land use designation of Industrial Employment and zoning of Industrial-Park. The project is anticipated to generate 2,052 weekly average daily trips. The existing land use generates approximately 1,337 weekly average daily trips. Therefore, the project would result in a net increase of 715 weekly average daily trips during operation (Rick Engineering 2021, 2022). This increase would not conflict with applicable transportation regulations or plans. Therefore, the project 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.

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 found that while VMT related impacts in the majority of the Housing Program project areas would result in less than significant impacts where development is located in VMT efficient areas (at or below 85 percent of the regional average), impacts in less efficient VMT per capita and per employee areas (greater than 85 percent of the regional average) would remain significant and unavoidable. Although development under the Housing Program combined with improvements resulting from the Mobility Choices Program were anticipated to result in the implementation of infrastructure improvements that could result in reductions in per capita VMT, at a program level, it could not be determined whether those improvements would sufficiently reduce potentially significant VMT impacts to below the threshold of significance. The Mobility Choices Program would provide for additional transportation infrastructure and amenities that would support reductions in per capita VMT. Implementation of such infrastructure and

amenities would not be associated with significant VMT related impacts, and impacts would be less than significant. Although the Mobility Choices Program was anticipated to result in the implementation of infrastructure improvements that could result in per capita VMT reductions, at a program level, 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. VMT impacts associated with development under the Housing Program located in less efficient VMT areas would be significant and unavoidable for both VMT per capita and VMT per employee.

The VMT analysis provided is by nature a cumulative issue. Thus, cumulative VMT impacts at this level of programmatic review would be significant for development occurring under the Housing Program located within areas on the SANDAG maps estimated to generate VMT per capita and VMT per employee greater than 85 percent of the base year regional average as discussed above.

Project

On September 27, 2013, Governor Jerry Brown signed SB 743 into law and started a process intended to fundamentally change transportation impact analysis as part of CEQA compliance. The Office of Planning and Research (OPR) published its latest Technical Advisory on Evaluating Transportation Impacts in CEQA to the California Natural Resources Agency in December 2018. This Technical Advisory provides recommendations on how to evaluate transportation impacts under SB 743. These changes include elimination of auto delay, LOS, and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant CEQA transportation impacts. The OPR guidance covers specific changes to the CEQA Guidelines and recommends elimination of auto delay for CEQA purposes and the use of VMT, as the preferred CEQA transportation metric. This new legislation requires the selection of a VMT analysis methodology, establishment of VMT thresholds for CEQA transportation impacts, and identification of feasible mitigation strategies.

The VMT Assessment prepared for the project was prepared in accordance with the City of San Diego Transportation Study Manual (TSM), which are consistent with OPR's recommendations and evaluate potential transportation impacts metric. The City of San Diego TSM includes screening criteria, significance thresholds, analysis methodology, and mitigation.

The following screening criterion from the City's TSM was utilized to determine if the project would be screened out from VMT analysis: if this Commercial Employment Project is located within a VMT efficient location per SANDAG Screening Map (15 percent or more below average VMT per employee). As the proposed land use of the site is research and development, it would fall within the Commercial Employment category for VMT purposes, in which the VMT threshold is based on employee VMT per employee.

The SANDAG Series 14 Activity Based Model 2 (ABM2) (Base Year 2016) regional mean VMT per employee is 27.2. Projects located in census tracts with higher than 23.1 VMT per employee (85 percent of the regional mean) are considered to be located in a VMT-inefficient area and are not

screened out from VMT analysis. Census tract 83.39 in which the project site is located has a Series 14 ABM2 (Base Year 2016) VMT per employee of 32.1, or 118 percent of the regional mean. Therefore, the project is not screened out from VMT analysis per the City's screening criteria, and due to the location of the project in a VMT-inefficient area, the project may 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.

As stated above, the project is in a census tract with 32.1 VMT per employee, or 118% of the regional mean. The proposed project would have a significant VMT impact based on the significance threshold for a commercial employment project of 15% below the regional mean VMT per Employee. Therefore, mitigation is required to reduce the project's VMT impact to the greatest extent feasible.

Although the project is within the Coastal Overlay Zone and not yet subject to the Complete Communities: Mobility Choices ordinance (effective January 8, 2021 outside the Coastal Zone), the project has chosen to participate in the City of San Diego's Complete Communities Mobility Choices Program and rely upon the Findings and Statement of Overriding Considerations from the Complete Communities: Housing Solutions and Mobility Choices Final PEIR as mitigation to the extent feasible for its significant unmitigated VMT transportation impact.

The San Diego Municipal Code Ordinance Number O-21274 provides the development regulations for the Mobility Choices portion of the Complete Communities Program. According to the ordinance, the project is within Mobility Zone 3. The Mobility Zone 3 designation indicates that the community planning area boundary has a VMT efficiency of 85 percent or less of the regional average employee VMT per employee.

The San Diego Municipal Code Section 143.1103(b) indicates the requirement for the application of VMT Reduction Measures for all development located within a Mobility Zone 3 in accordance with the Land Development Manual Appendix T. The Land Development Manual Appendix T provides a list of VMT Reduction Measures that are split into a series of categories, which include Pedestrian Measures, Bicycle Supportive Measures, Transit Supportive Measures, and Other Measures. Each of the individual measures is given an assigned point value per unit of measure.

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. Under MM-TRA-1, The project would provide VMT reduction measures as required by the ordinance that add up to at least 8 points as identified in the Land Development Manual Appendix T, through the measures provided in Table 5, *VMT Reduction Measures for Mobility Choices Compliance*, below.

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 5
VMT REDUCTION MEASURES FOR MOBILITY CHOICES COMPLIANCE

#	VMT Reduction Measure	Description	Unit or Yes/No	Points/ Unit	Total Points
Bicycle Supportive Measures					
1	Providing short-term bicycle parking spaces that are available to the public, at least 10 percent beyond the minimum requirements.	The project is required to provide 30 short-term bicycle parking spaces and will provide 36 spaces.	Each multiple of 10 percent beyond the minimum.	1.50	3.00
4	Providing long-term bicycle parking spaces, at least 10 percent beyond the minimum requirements.	The project is required to provide 30 long-term bicycle parking spaces and will provide 36 spaces.	Each multiple of 10% beyond the minimum.	2.00	
5	Providing on-site showers/lockers at least 10 percent beyond the minimum requirement.	The project is required to provide 12 lockers and will provide 40 spaces. The project is also required to provide 3 shower facilities and will be providing 8 facilities.	Yes	2.00	
Transportation Supportive Measures					
6	Providing low cost amenities/upgraded features to an existing transit stop (above existing conditions), i.e., addition of bench public art, static schedule and route display, trash receptacle.	The project will coordinate with the North County Transit District to provide a bus shelter, a bench, and a trash receptacle for the existing bus stop located approximately 65 feet north of N.U. System Driveway adjacent to the project site.	Each upgraded feature	1.00	
Total Project VMT Reduction Measure Points					**10.00**

As shown above, the project's proposed VMT reduction measures under MM-TRA-1 total to 10 points meeting the minimum required 8 points. Therefore, the project would mitigate its significant VMT impact to the extent feasible by opting in the City's Complete Communities Mobility Choices program and rely upon the Findings and SOCs from the Complete Communities: Housing Solutions and Mobility Choices Final PEIR.

Therefore, a Mitigation Monitoring Reporting Program (MMRP), as detailed within Section V of the Mitigated Negative Declaration (MND), would be required.

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: Substantially increase hazards due to 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 requirements that would result in a substantial increase in hazards due to design features or incompatible uses. Impacts would be less than significant.

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 office uses. The proposed research and development uses would be compatible with the site's land use designation of Industrial Employment and zoning of Industrial-Park. The project would not include geometric design features and paved internal roadways would not include sharp curves or intersections. Rather, the project would include roadway improvements to local roadways. The project would extend the eastbound right turn lane by an additional 90 feet to provide for a total length of 200 feet of the turn lane at the intersection of North Torrey Pines Road/Genesee Avenue and Torrey Pines Road. The project would also install retroreflective borders to the traffic signal heads to improve visibility at the intersection of North Torrey Pines Road/Genesee Avenue and Torrey Pines Road, and at the intersection of Genesee Avenue and John Jay Hopkins Drive. Therefore, 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 determined that future development allowed under the proposed ordinances would be required to comply with all applicable City codes and policies related to

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

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. The project would include the construction of three 30-foot-wide driveways per current City Standards, adjacent to the site on North Torrey Pines Road with the northernmost driveway for emergency access only. 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 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 four access points via one forty five-foot wide existing signalized entry way, two thirty-foot wide existing right-in/right-out only driveways and a new thirty-foot wide right-in/right-out only driveway all along N. Torrey Pines Road. The project proposes to reconstruct the three existing project driveways to current standards per City of San Diego Standard Drawings. The reconstructed existing northernmost driveway is proposed as emergency access only driveway to provide a fire access loop at North Torrey Pines Road on the northern parcel. The main signalized project driveway at North Torrey Pines Road and N.U. System Driveway intersection will remain as full access and the remainder three driveways will operate as right-in/right-out only access. 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?	☐	☐	☐	☒	☐

According to the California Department of Forestry and Fire Protection's (CAL FIRE's) map of Very High Fire Hazard Severity Zones (VHFHSZ) prepared for the city of San Diego, the project site and the majority of the surrounding area is located within a Local Responsibility Area VHFHSZ (CAL FIRE 2009). However, implementation of the project would not increase wildland fire risk at the site over existing conditions. The project would replace the existing office uses with research and development uses that are consistent with the site's zoning of Industrial-Park and land use designation of Industrial Employment. The project would install standard fire safety features and construct buildings in compliance with the fire regulations in the CBC. Therefore, the project would

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

not expose people or structures to a significant risk of loss, injury, or death involving wildland fires. 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?	☐	☐	☐	☒	☐

As discussed under Section 6.15, Issue 1 above, the VHRHSZ map prepared by CAL FIRE for the city of San Diego classifies the project site and the majority of the surrounding area is located within a VHRHSZ (CAL FIRE 2009). Areas are classified based on their terrain, weather, and other factors relevant to exacerbating wildfires. Although the project is located near the slopes at the open space to the east, implementation of the project would not increase wildland fire risk at the site over existing conditions. The project would replace the existing office uses with research and development uses that are consistent with the site's zoning of Industrial-Park and land use designation of Industrial Employment. The project would install standard fire safety features and construct buildings in compliance with the fire regulations in the CBC. Therefore, the project would not expose project occupants to pollutant concentrations from a wildfire of the uncontrolled spread of a wildfire due to slope, prevailing winds, and other factors. Impacts 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?	☐	☐	☐	☒	☐

The project has a zoning of Industrial-Park and land use designation of Industrial Employment. The project would construct research and development uses similar to those in the area, and would not install infrastructure such as roads, fuel breaks, emergency water sources, power lines, or other utilities that may exacerbate fire risk. The project would construct several roadway improvements in the area such as extending the eastbound right turn lane at the intersection of North Torrey Pines Road/Genesee Avenue and Torrey Pines Road and installing retroreflective borders to traffic signal heads and two intersections; however, such improvements would not exacerbate fire risk and no new roads would be introduced as a result of the project. If the project requires underground utility installation or connections, the utilities would be minimal and similar to the research and development uses in the surrounding area. Construction work would be both minimal and temporary, and would not exacerbate fire risk or result in temporary or ongoing impacts to the environment. 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: 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 proposed project involves the replacement of office land uses with research and development uses and supporting amenities on a site with a zoning of Industrial-Park and land use designation of Industrial Employment. As stated in Section 6.15, Issue 2 above, the proposed project would not exacerbate wildfire risks due to slope, prevailing winds, and other factors, and would not expose project occupants to significant levels of pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. The risk of people and structures experiencing significant risks such as downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes is negligible. As such, impacts would be less than significant.

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?	☐	☐	☐	☒	☐

A scenic vista is generally defined as a public viewpoint that provides expansive or notable views of a highly valued landscape and are typically identified in planning documents, such as a community plan, but can also include locally known areas or locations where high-quality public views are available (University Community Planning Group 2018). The University Community Plan does not explicitly list scenic vistas within the planning area, but does recognize natural resources as visual resources. As such, the open space to the north and east of the project site can be considered scenic resources.

The project site is currently occupied by office land uses and does not include a public viewing area of the open space near the site. Implementation of the project would replace the existing buildings with research and development and supporting amenities, which would be of similar size and height to the existing uses. The project would not block views or remove scenic vistas at the site because none are currently available. Impacts would be less than significant.

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 involves the replacement of an existing office land use with research and development buildings and supporting amenities. Therefore, the character of the site would be similar to existing conditions. Additionally, the project would be consistent with the site's zoning of Industrial-Park and land use designation of Industrial Employment. The project would also have similar character to the nearby research and development land uses in the area. Therefore, the project would not result in a substantial adverse alternation to the existing or planned character of the area. 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 the loss of any distinctive or landmark tree(s), or stand of mature trees?	☐	☐	☐	☒	☐

Project implementation may result in the removal of onsite ornamental trees; however, the project would not result in the loss of any distinctive or landmark trees, or stand of mature trees. Moreover, as part of implementing the City's CAP the project is required to comply with the City's Urban Forestry Program. As part of the Urban Forestry Program, two trees are to be planted for every tree removed. This may occur within a two-mile radius of the site, creating a larger population of trees in the project area, and creating a visual benefit.

As discussed in Section 6.3, Biological Resources, Torrey pine trees are the only distinctive trees located on the project site. All naturally-occurring Torrey pine trees within the project site would be avoided and the project will implement tree protection and general measures to avoid and minimize impacts to naturally-occurring Torrey pines through the establishment of TPZs for each naturally-occurring Torrey pine tree on, and immediately adjacent to, the site. A TPZ will help ensure that a tree is protected during construction, has enough space for root and branch growth, and will receive adequate supplies of soil nutrients, air, and water. Therefore, the project would not result in the loss of any distinctive or landmark trees, or stand of mature trees. Impacts would be less than significant.

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

Project implementation would require earthwork such as grading and excavation during construction activities. However, ground-disturbing construction activities would be typical of construction of similar land uses. The project is currently occupied by office land uses, and would be replaced by research and development buildings and supporting amenities. The existing landform at the site would not be substantially altered. Impacts would be less than significant.

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

There are two primary sources of light: light emanating from building interiors that passes through windows and light from exterior sources (e.g., street lighting, parking lot lighting, building illumination, security lighting, and landscape lighting). The introduction of light can be a nuisance by affecting adjacent areas and diminishing the view of the clear sky depending on the location of the light sources and its proximity to nearby light-sensitive areas.

The project site is located in an area that is developed with primarily commercial and industrial uses, with a golf course to the west and open space to the north and east. The existing light conditions in the project area include building lights, security lights, and the adjacent commercial and industrial uses. There is also nearby street lighting.

Construction activities would occur during permitted daylight hours between 7:00 a.m. and 7:00 p.m. Nighttime construction is not planned.

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 project would include lighting typical of industrial park and commercial land uses; such lighting would not create a new source of substantial light that would adversely affect daytime or nighttime views in the area. Sources of light would include interior light emanating from the buildings and exterior lighting for security, ambience, and signage. Largely, the project lighting would be similar to the existing land uses. Moreover, lighting would be regulated by compliance with Section 142.0740 of the City of San Diego Land Development Code and the MHPA Land Use Adjacency Guidelines. Similar to the existing structures, the project would incorporate glass on the building exterior to serve as windows for the building. In accordance with Section 142.0730 of the Land Development Code, glass material having a light reflectivity greater than 30 percent would not be incorporated into the project's exterior. Those areas that would provide glass material would be tempered where required and would not result in the reflection of natural or artificial light off of the glass such that a bird strike or safety impact to motorists on surrounding roadways would occur. Impacts would be less than significant.

6.17 AGRICULTURAL AND FOREST RESOURCES - – Would the project:

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

Issue 1:	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒

Agricultural land is rated according to soil quality and irrigation status; the best quality land is called Prime Farmland. Unique farmland is land, other than prime farmland, that has combined conditions to produce sustained high quality and high yields of specialty crops. Farmland of Statewide Importance may include tracts of land that have been designated for agriculture by State law. In some areas that are not identified as having national or statewide importance, land is considered to be Farmland of Local Importance. The Farmland Mapping and Monitoring Program (FMMP) maintained by the California Department of Conservation (CDC) is the responsible state agency for overseeing the farmland classification. In addition, the City's Thresholds state that in relation to converting designated farmland, a determination of substantial amount cannot be based on any one numerical criterion (i.e., one acre), but rather on the economic viability of the area proposed to be converted. Another factor to be considered is the location of the area proposed for conversion.

According to the CDC's California Important Farmland Finder (CDC 2018), the project site is classified as Other Land; land not included in any other mapping category, such as, low density rural developments; brush, timber, wetland, and riparian areas not suitable for livestock grazing; confined livestock, poultry or aquaculture facilities; strip mines, borrow pits; and water bodies smaller than

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

forty acres. Vacant and nonagricultural land surrounded on all sides by urban development and greater than 40 acres is mapped as Other Land and does not contain any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Agricultural land is not present on the site or in the general vicinity. As a result, the project would not result in the conversion of such lands to non-agricultural use. No impacts would occur.

Issue 2:	Conflict with existing zoning for agricultural use, or a Williamson Act Contract?	☐	☐	☐	☒

The Williamson Act, also known as the California Land Conservation Act of 1965, enables local governments to enter into contracts with private landowners for the purpose of restricting specific parcels of land to agricultural or related open space use; in return, landowners receive property tax assessments which are much lower than normal because they are based upon farming and open space uses as opposed to full market value. The Williamson Act is only applicable to parcels within an established agricultural preserve consisting of at least 20 acres of Prime Farmland, or at least 40 acres of land not designated as Prime Farmland. The Williamson Act is designed to prevent the premature and unnecessary conversion of open space lands and agricultural areas to urban uses.

As stated in item II(a), the project site is located in an area classified by the CDC as Other where neither farmland nor agricultural resources are present. The project site is zoned as IP-1-1indicating that the desired land uses are research and development and those compatible with light industrial. Additionally, the project site is not encumbered by a Williamson Act Contract and would not affect any properties zoned for agricultural use or affected by a Williamson Act Contract, as there are none within the project vicinity. No impacts would occur.

Issue 3:	Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 1220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	☐	☐	☐	☒

Public Resources Code Section 12220(g) defines “forest land” as land that can support 10 percent native cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits. Based on this definition, no forest land occurs within or adjacent to the project site. Moreover, there is no land zoned as forest land or timberland that exists within the project site or within its vicinity. There are scattered trees throughout the site, including Torrey Pines; however, there are no concentration of trees within the site that would constitute a forest. Moreover, as discussed in Section 6.3, Issue 1, the project has been designed to avoid direct impacts to naturally occurring Torrey pine trees, and no removals of naturally-occurring Torrey pine trees are expected. The project would not conflict with existing zoning for or cause a rezoning of forest land, timberland, or timberland zoned Timberland Production. 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 4: Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐		☒

As stated in II(c), there is no forest land present on the site or vicinity. The site has not been historically used, and is not currently used or planned to be used for forest land. As such, implementation of the proposed project would not result in the loss of forest land or conversion of forest land to non-forest use. No impact would occur.

6.18 MINERAL RESOURCES - – Would the project:

Issue 1: Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐		☒

The DOC classifies the project site as within Mineral Resource Zone 1 (MRZ-1), areas where adequate information indicates that no significant mineral deposits are present or where it is judged that there is little likelihood for their presence to exist. The project site is not currently being utilized for mineral extraction and the site is zoned and planned for R&D purposes with supporting amenities. The project would not result in the loss of availability of a known mineral resource. No impact would occur.

Issue 2: Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☐		☒

Please see response to Section 6.18 Issue 2. No impact would occur.

6.19 POPULATION AND HOUSING - – Would the project:

Issue 1: Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒		☐

The proposed project does not include housing that would directly induce population growth. The project would provide employment opportunities through the development of 454,609 SF of R&D land uses and associated amenities and infrastructure. As discussed, the future tenants are unknown, so it is too speculative to provide an estimate on the number of new employment opportunities that would be introduced and if those opportunities would be at a magnitude to induce the relocation of employees to the area. It is possible that some of the project's future tenants would have a percentage of employees relocate to the area, but such numbers would not be substantial so as to adversely affect existing and future housing stock in the community. According to estimates by the San Diego Association of Governments, the La Jolla area had a 9.6 percent housing vacancy rate in 2021, and is projected to have a vacancy rate of 11.2 percent in 2035 and

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

continue to remain fairly stable near that rate for the planning horizon of 2050 at 11.9 percent. Thus, any incremental population growth as a result of project-related employment opportunities could be accommodated by the current and future housing stock. Therefore, impacts would be less than significant.

Issue 2:	Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

The project site is currently developed with the National University - La Jolla, California Academic Headquarters and also included underground parking, tennis courts, a pool, and a private helistop, all of which would be demolished to accommodate the proposed project. Thus, the proposed project would not displace existing housing, necessitating the construction of replacement housing elsewhere. Moreover, the project site is not designated or zoned for residential land uses and therefore, project implementation would not remove land assigned for this purpose thereby indirectly resulting in the need for housing elsewhere. Therefore, no impacts would occur.

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?	☐	☐	☒	☐	☐

Potentially significant impacts to the environment resulting from the proposed project have been identified for the areas of biological resources. The project would have the potential to result in significant impacts to sensitive vegetation communities, special status plant species, and special status animal species. Additionally, the project would result in significant impacts to Tier I Habitats. However, with implementation of mitigation measures BIO-1 through BIO-3, impacts would be reduced to a less than significant level.

The project is not expected to significantly impact cultural or tribal cultural resources related to major periods of California history or prehistory. Additionally, potential impacts to paleontological resources 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: 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)?	☐	☐	☒	☐	☐

Cumulative impacts are defined as two or more individual project effects that, when considered together or in concert with other projects, combine to result in a significant impact (CEQA Guidelines Section 15355). There is potential for the construction schedules of other projects in the city to overlap. Construction of the proposed project would have the potential to impact biological resources; however, impacts would be specific to the site and would not contribute to cumulative impacts. Similarly, construction impacts to cultural and tribal cultural resources would be site-specific, so the project's less than significant impacts would not contribute to cumulative impacts. The project may result in impacts to paleontological resources that would be reduced to less than significant through standard paleontological monitoring required by San Diego Municipal Code Section 142.0151; and would also be site-specific. Construction noise and vibration would be far below the applicable thresholds, and therefore would not contribute to cumulative noise impacts. Additionally, all nearby projects would be required to comply with existing federal, state, and local regulations.

Cumulative transportation impacts are discussed in Section 6.14 above. As discussed, the project would not result in cumulative transportation impacts related to conflicting with a circulation plan, implementing hazardous design features or incompatible uses, or resulting in emergency access. While the project would result in a significant project-level impact related to VMT, the project would be consistent with the findings in the Complete Communities PEIR and would implement VMT reduction measures to reduce impacts to the extent feasible. Therefore, the project would not result in new cumulative impacts that have not previously been analyzed in the Complete Communities PEIR.

The project would be consistent with the site's land use designation of Industrial Employment and zoning of Industrial-Park. Therefore, the project would be consistent with applicable planning documents, and operation of the project would not cause significant impacts that could contribute to cumulative impacts. The project would not result in impacts that are individually limited but cumulatively considerable.

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

The proposed project would adhere to regulatory codes, ordinances, regulations, standards, and guidelines applicable to each of the environmental issue areas analyzed herein. As described above,

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 project would have a less than significant impact on air quality and greenhouse gas emissions and would not result in emissions that would significantly impact sensitive receptors. The project would not have the potential to cause adverse effects on human beings through the use, transport, or storage of hazardous materials through adherence to applicable regulations. Additionally, the project would not generate noise or vibrations at such levels that would have substantial adverse effects on human beings. Impacts would be less than significant.

7. SUPPORTING INFORMATION SOURCES

Land Use

San Diego County Regional Airport Authority. 2011. MCAS Miramar Airport Land Use Compatibility Plan. November.

Air Quality

California Air Resources Control Board (CARB). 2005. Air Quality and Land Use Handbook: A Community Health Perspective. April.

HELIX Environmental Planning, Inc. 2021. One Alexandria North Project Air Quality Technical Report. December.

Rick Engineering Company. 2022. One Alexandria North Local Mobility Analysis. January 25.

San Diego County Air Pollution Control District (SDAPCD). 2020. 2020 Plan for Attaining the National Ambient Air Quality Standards for Ozone in San Diego County. October.

Biology

City of San Diego (City). 2018. City of San Diego Municipal Code, Land Development Code, Biology Guidelines. Amended. February 1 by Resolution No. R-311507. Available at: https://www.sandiego.gov/sites/default/files/amendment_to_the_land_development_manual_biology_guidelines_february_2018_-_clean.pdf.

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HELIX Environmental Planning, Inc. (HELIX). 2022. One Alexandria North Project Biological Technical Report. February.

Energy

Not applicable.

Geology/Soils/Seismicity

Geocon Incorporated. 2021. Geotechnical Investigation, One Alexandria North, 11255 and 11355 North Torey Pines Road, San Diego, California. August 24.

Greenhouse Gas Emissions

City of San Diego (City). 2015. Climate Action Plan. December.

Health and Safety

Department of Toxic Substances Control (DTSC). 2022. EnviroStor. Accessed February 1. Available at: https://www.envirostor.dtsc.ca.gov/public/.

Rick Engineering Company. 2021. One Alexandria North Local Mobility Analysis. June 24.

San Diego County Regional Airport Authority. 2011. MCAS Miramar Airport Land Use Compatibility Plan. November.

State Water Resources Control Board (SWRCB). 2022. GeoTracker. Accessed February 1. Available at: https://geotracker.waterboards.ca.gov/.

Historical/Archaeological/Tribal Cultural Resources

HELIX Environmental Planning, Inc. 2021. One Alexandria North Archaeological Resources Report Form. July.

Hydrology/Water Quality

Rick Engineering Company. 2022. Drainage Study for One Alexandria North. March 23.

2021. Priority Development Project (PDP) Storm Water Quality Management Plan (SWQMP), One Alexandria North. September 10.

Noise

California Department of Transportation (Caltrans). 2020. Transportation and Construction Vibration Guidance Manual. April.

2013. Technical Noise Supplement to the Traffic Noise Protocol. September.

San Diego County Regional Airport Authority. 2011. MCAS Miramar Airport Land Use Compatibility Plan. November.

Paleontological Resources

Geocon Incorporated. 2021. Geotechnical Investigation, One Alexandria North, 11255 and 11355 North Torey Pines Road, San Diego, California. August 24.

Public Services and Facilities

Not applicable.

Public Utilities and Infrastructure

City of San Diego (City). 2021. 2021 Certified Construction & Demolition Recycling Facility Directory. Environmental Services Department. July 1. Available at: https://www.sandiego.gov/sites/default/files/certified-cd-recycling-facility-directory.pdf.

Dexter Wilson Engineering. 2021. Water System Analysis for the One Alexandria North Project in the City of San Diego. December 23.

HELIX Environmental Planning, Inc. (HELIX). 2022. One Alexandria North Project Waste Management Plan. February.

Rick Engineering Company. 2021. Sewer Study for One Alexandria North. December 22.

Transportation

City of San Diego (City). 2020. Final Program Environmental Impact Report for Complete Communities: Housing Solutions and Mobility Choices, San Diego, California. May. Available at: https://www.sandiego.gov/sites/default/files/final_peir_for_complete_communities_housing_solutions_and_mobility_choices.pdf.

Rick Engineering Company. 2022. One Alexandria North Vehicle Miles Traveled Analysis. March 14.

Visual Effects and Neighborhood Character

University Community Planning Group. 2018. University Community Plan. Adopted July 7, 1987. Amended September 10.

Wildfire

California Department of Forestry and Fire Protection (CAL FIRE). 2009. Very High Fire Hazard Severity Zones in LRA As Recommended by CAL FIRE, San Diego. June 11.

Agricultural Resources

California Department of Conservation. 2022. Farmland Mapping and Monitoring Program Interactive Web Maps. Available at: https://maps.conservation.ca.gov/agriculture/.

Mineral Resources

California Department of Conservation. 1996. Generalized Mineral Land Classification Map of Western San Diego County. Available at: https://maps.conservation.ca.gov/mineralresources/.

Population and Housing

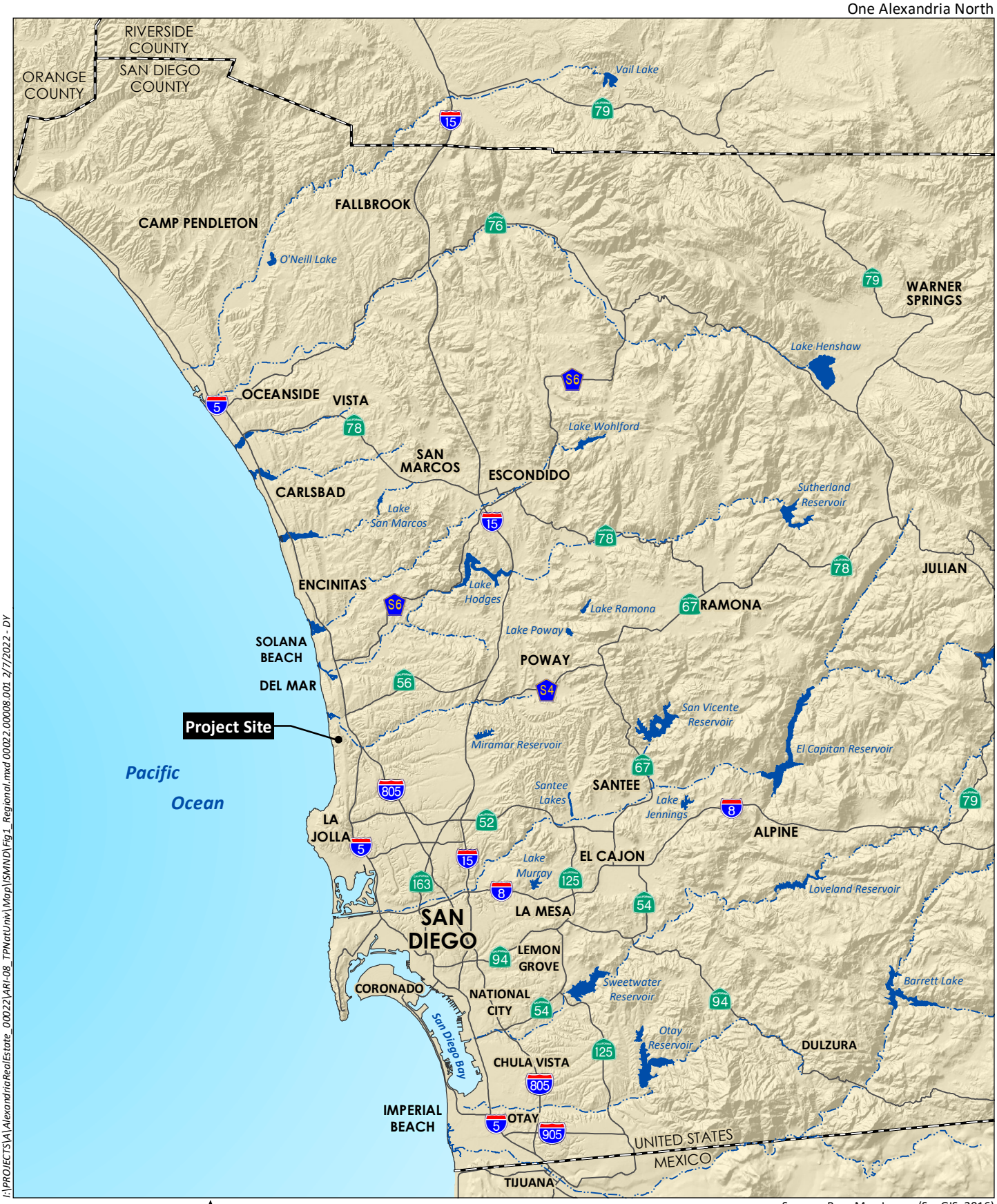
San Diego Association of Governments. 2021 Series 14 Regional Growth Forecast Zip Code 92037. Available at: https://www.sandag.org/index.asp?classid=26&fuseaction=home.classhome

8. LIST OF ACRONYMS AND ABBREVIATED TERMS

AAQS	Ambient Air Quality Standards
AB	Assembly Bill
ADD	Assistant Deputy Director
ADT	average daily trips
AICUZ	Air Installations Compatible Use Zone
ALUCP	Airport Land Use Compatibility Plan
APE	Area of Potential Effect
APZ II	Accident Potential Zone II
BCME	Biological Construction Mitigation/Monitoring Exhibit
BMP	best management practice
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
CAL FIRE	California Department of Forestry and Fire Protection
CalRecycle	California Department of Resources Recycling and Recovery
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CARB	California Air Resources Board
CBC	California Building Code
CCC	California Coastal Commission
C&D	construction and demolition
CDP	Coastal Development Permit
CEQA	California Environmental Quality Act
CFS	cubic feet per second
CO	carbon monoxide
CO_2e	carbon dioxide equivalent
CRPR	California Rare Plant Rank
CRZ	critical root zone
CSVR	Consultant Site Visit Record
CUP	Central Utility Plant / Conditional use Permit
dBA	A-weighted decibels
DPM	diesel particulate matter
DTSC	Department of Toxic Substances Control
ESHA	environmentally sensitive habitat area
ESL	environmentally sensitive lands
FAR	Floor Area Ratio
GHG	greenhouse gas

gpm	gallons per minute
HRA	health risk assessment
HVAC	heating, ventilation, and air conditioning
LCP	Local Coastal Program
L_{EQ}	equivalent continuous sound level
LID	low-impact development
L_{MAX}	maximum reference noise level
LOS	Level of Service
MCAS	Marine Corps Air Station
MEI	maximally exposed individual
MHPA	Multiple Habitat Planning Area
MMC	Mitigation Monitoring Coordination
MMT	million metric tons
MSCP	Multiple Species Conservation Plan
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NDP	Neighborhood Development Permit
NO_2	nitrogen dioxide
NPDES	National Pollution Discharge Elimination System
OPR	Office of Planning and Research
PCE	perchloroethylene
PDP	Priority Development Project
PM_{10}	respirable particulate matter 10 microns or less in diameter
$PM_{2.5}$	fine particulate matter 2.5 microns or less in diameter
PPV	peak particle velocity
R&D	research and development
RWQCB	Regional Water Quality Control Board
SANDAG	San Diego Association of Governments
SB	Senate Bill
SDAB	San Diego Air Basin
SDAPCD	San Diego Air Pollution Control District
SDP	Site Development Permit
SIP	state implementation plan
SMAQMD	Sacramento Metropolitan Air Quality Management District
SO_2	sulfur dioxide
SWPPP	Storm Water Pollution Prevention Plan
SWQMP	Storm Water Quality Management Plan

SWRCB	State Water Resources Control Board
TAC	toxic air contaminant
TM	Tentative Parcel Map
TPZ	tree protection zone
TSM	Transportation Study Manual
USEPA	U.S. Environmental Protection Agency
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	vehicle miles traveled
WMP	Waste Management Plan



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0 8 Miles

Source: Base Map Layers (SanGIS, 2016)

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Regional Location

Figure 1

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0 200 Feet

Source: Aerial (SanGIS, 2019)

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Aerial Photograph

Figure 2

One Alexandria North

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Source: Aerial (SanGIS, 2019)

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Site Plan

Figure 3