



THE CITY OF SAN DIEGO

ENVIRONMENTAL IMPACT REPORT

Project No. 658548
SCH No. 2021040374

SUBJECT: **Scripps Mercy Hospital Campus:** A CONDITIONAL USE PERMIT (CUP) to amend existing CUP No. 304755, SITE DEVELOPMENT PERMIT (SDP) to amend existing SDP No. 531932, a NEIGHBORHOOD USE PERMIT (NUP) for a COMPREHENSIVE SIGN PLAN, a TENTATIVE MAP (TM) to adjust property lines, PUBLIC UTILITY EASEMENT VACATION, ~~PUBLIC STREET VACATION~~ and a PLANNED DEVELOPMENT PERMIT (PDP) for demolition and construction on the Scripps Mercy Hospital Campus site. Demolition would include the Facility Building, Generator Building and Cooling Tower, Behavioral Health Clinic, Hospital Building, 550 Washington Building, 550 Washington Parking Structure, Mercy Manor, Parking Lot 4.1, Emergency Department, and Boiler and Laundry Building. Construction for the project would include Hospital I (15 stories, approximately 631,590 square feet), Hospital II (15 stories, approximately 380,000 square feet), Hospital Support Building (three stories with three levels of parking below ground, approximately 67,000 square feet), Medical Office Building (seven stories with two levels of subterranean parking and three levels of above ground parking, approximately 200,000 square feet), Ambulance Drop-off Area, Loading Dock Area, Central Energy Plant Expansion (approximately 2,400 square feet), and Utility Yards (totaling approximately 18,500 square feet). The Cancer Center and associated parking structure, currently under construction, would remain, as well as the College Building, Mercy Gardens, the Chapel, Central Energy Plant, Parking Lot 12, and Generator Building and Cooling Tower. A new parking structure (6th Avenue Parking Structure and Pedestrian Bridge) has been previously approved and would be constructed at the surface parking located on the east side of Sixth Avenue separately and in advance of major construction efforts of the project. The 21.07-acre site is in the CC-3-8, CC-3-9, RM-3-9, OC-1-1, and OR-1-1 zones; Community Plan Implementation Overlay Zone-A; Airport Influence Area (San Diego International Airport); FAA Part 77 Review Area; Parking Standards Transit Priority Area; Transit Area Overlay Zone; and Transit Priority Area within the Uptown Community Plan Area.

4/6/2023: Minor revisions have been made to the draft Environmental Impact Report (EIR). Specifically, the typographical errors and clarifications to mitigation measures were made to the final environmental document. Added language appears in a ~~strikeout~~ and underlined format. CEQA Guidelines section 15088.5 requires a lead agency to recirculate a negative declaration when the document must be substantially revised after public notice of its

availability has previously been given. Pursuant to CEQA Guidelines section 15088.5, a "substantial revision" includes: (1) A new significant environmental impact would result from the project (2) A substantial increase in the severity of an environmental impact would occur (3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the projects proponents decline to adopt it (4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

CEQA is clear that recirculation is not required if "new information is added to the negative declaration which merely clarifies, amplifies, or makes insignificant modifications to the negative declaration." (CEQA Guidelines, §15073.5(c)(4).) None of the revisions made meet the recirculation requirements. As such, recirculation is not required.

ENVIRONMENTAL DETERMINATION:

This document has been prepared by the City of San Diego's Environmental Analysis Section under the direction of the Development Services Department and is based on the City's independent analysis and conclusions made pursuant to 21082.1 of the California Environmental Quality Act (CEQA) Statutes and Sections 128.0103(a), 128.0103(b) of the San Diego Land Development Code.

Based on the analysis conducted for the project described above, the City of San Diego, as the Lead Agency, has prepared the following Environmental Impact Report. The analysis addressed the following issue area(s) in detail: **Land Use, Transportation/Circulation, Visual Effects and Neighborhood Character, Air Quality, Historical Resources, Noise, Greenhouse Gas Emissions, Public Services and Facilities and Public Utilities.**

The EIR concluded that the project would result in significant but mitigated environmental impacts to **Air Quality** and **Noise (Construction)**. Significant **Noise (Operational)**, and **Land Use (Noise)** impacts resulting from the project would remain significant and unmitigated. All other impacts analyzed in the draft EIR were determined to be less than significant.

The purpose of this document is to inform decision-makers, agencies, and the public of the significant environmental effects that could result if the project is approved and implemented, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project.

PUBLIC REVIEW DISTRIBUTION:

The following agencies, organizations, and individuals were distributed either the Public Notice or a copy of the draft Environmental Impact Report:

State of California

Caltrans, District 11 (31)
Cal Recycle (35)
Department of Toxic Substance Control (39)
State Clearinghouse (46)
California Department of Transportation (51A)
California Department of Transportation (51B)
Native American Heritage Commission (56)
California Energy Commission (58)

City of San Diego

Mayor's Office (91)
Councilmember Whitburn, District 3 (MS 10A)
Development Services Department
 Development Project Manager – Martha Blake
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 Engineering – Hoss Florezabihi
 Geology – Patrick Thomas
 Landscaping – Vanessa Kohakura
 Planning – Phillip Lizzi
 Transportation Development – Meghan Lithgow
 Plan Historic – Suzanne Segur
 Water & Sewer Development – Gary Nguyen
Planning Department
 Long-Range Planning – Shannon Mulderig
 Public Utilities Department – Sandra Carlson
Historical Resources Board (87)
Environmental Services Department (93A)
City Attorney (93C)

Other Interested Organizations, Groups and Individuals

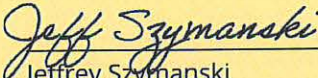
San Diego Association of Governments (108)
Metropolitan Transit Systems (112)
San Diego Gas and Electric (114)
Carmen Lucas (206)
South Coastal information Center (210)
San Diego Archaeological Center (212)
Save Our Heritage Organization (214)
Ron Christmas (215)
Clint Linton (215B)
Frank Brown – Inter – 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)
Native American Heritage commission (222)

John Stump
Uptown Planners (498)
Middleton Property Owner's Association (496)
Mission Hills Heritage (497)
Hillside Protection Association (501)
Bankers Hill Canyon Association (502)
Allen Canyon Committee (504)
UCSD Physical & Community Planning (505)
Scripps Health, Applicant
Karen Ruggels, KLR Planning, Environmental Consultant
Jeff Modrzejewski, SEED SD

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.
- (X) 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 Environmental Impact Report, the Mitigation Monitoring and Reporting Program, and any technical appendices are available in the office of the Development Services Department for review, or for purchase at the cost of reproduction.



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Development Services Department

September 12, 2022

Date of Draft Report

April 6, 2023
Date of Final Report

Analyst: Szymanski

SCRIPPS MERCY HOSPITAL CAMPUS PROJECT

Final Environmental Impact Report

SCH No. 2021040374

Project No. 658548

April 2023

Prepared for:

City of San Diego
Development Services Department
Land Development Review
1222 First Avenue, MS 501
San Diego, CA 92101-4155

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LIST OF ACRONYMS AND ABBREVIATIONS

AB	Assembly Bill
AC	asbestos-cement
ACHP	Advisory Council on Historic Preservation
ADA	Americans with Disabilities Act
ADC	alterative daily cover
ADT	Average Daily Traffic
AEOZ	Airport Environs Overlay Zone
AFG	Accelerated Forecasted Growth
AHU	air handler unit
AIA	Airport Influence Area
ALUC	Airport Land Use Commission
ALUCOZ	Airport Land Use Compatibility Overlay Zone
ALUCP	Airport Land Use Compatibility Plan
AM/a.m.	morning
AMSL	Above Mean Sea Level
APCD	Air Pollution Control District
AQIA	Air Quality Impact Assessment
AQMP	Air Quality Management Plan
Basin Plan	Water Quality Control Plan for the San Diego Basin
BMPs	Best Management Practices
CAA	Clean Air Act
CAAA	Federal Clean Air Act Amendments
CAAQS	California Ambient Air Quality Standards
CAC	California Administrative Code
CalEPA	California Environmental Protection Agency
CAL FIRE	California Department of Forestry and Fire Protection
CALNAGPRA	California Native American Graves Protection and Reparation Act of 2001
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CBC	California Building Code
CC	Commercial Community
CCR	California Code of Regulations
CD	Construction Documents
CDFG	California Department of Fish and Game
CDIS	Clinical Documentation Integrity Specialist
CE	Conservation Element

CEQA	California Environmental Quality Act
CFR	Code of Federal Regulations
cfs	cubic feet per second
CH ₄	methane
CHSC	California Health and Safety Code
CIPs	Capital Improvement Projects
City	City of San Diego
City's Thresholds	City of San Diego's CEQA Significance Determination Thresholds
CMP	Congestion Management Program
CNEL	community noise equivalent level
CO	carbon monoxide
CO ₂	carbon dioxide
CO ₂ E	CO ₂ equivalents
CPIOZ	Community Plan Implementation Overlay Zone
CPU	Community Plan Update
CPUC	California Public Utilities Commission
CRA	Colorado River Aqueduct
CRHR	California Register of Historic Resources
CUP	Conditional Use Permit
CWA	Clean Water Act
cy	cubic yards
dba	A-weighted decibel
DCV	Design Capture Volume
DIF	Development Impact Fee
DMA	Drainage Management Area
DPF	diesel particulate filter
DPM	Diesel Particulate Matter
DSD	Development Services Department
Du/Ac	dwelling units/acre
DWR	Department of Water Resources
ED	Environmental Designees
EIB	Emission Inventory Branch
EIR	Environmental Impact Report
EMS	Emergency Medical Services
EMTs	emergency medical technicians
EO	Executive Order
EPA	United States Environmental Protection Agency
ESD	Environmental Services Department
ESL	Environmentally Sensitive Land

FAA	Federal Aviation Administration
FAR	floor area ratio
FEMA	Federal Emergency Management Agency
FIRM	Flood Insurance Rate Map
FTA	Federal Transit Administration
FY	fiscal year
GCC	Global Climate Change
GHG	greenhouse gas emissions
gpd	gallons per day
GWP	global warming potential
H&SC	Health and Safety Code
H.R.	House Resolution
HAPs	hazardous air pollutants
HCAI	California Department of Health Care Access and Information
HFCs	hydrofluorocarbons
HFE	hydrofluorinated ethers
HRA	health risk assessment
HRB	Historical Resources Board
HRG	Historical Resources Guidelines
HRRR	Historical Resource Research Report
HRTR	Historical Resources Technical Report
HSB	Hospital Support Building
HVAC	heating, ventilation, and air conditioning
Hz	Hertz
I	Interstate, as in I-5
IID	Imperial Irrigation District
IFS	Infrastructure Financing Studies
IPCC	United Nations Intergovernmental Panel on Climate Change
ISO	California Independent System Operator
ITPs	incidental take permits
ITS	Intelligent Transportation System
kV	kilo volts
lbs	pounds
LCFS	low carbon fuel standard
LDC	Land Development Code
LDM	Land Development Manual
Ldn	day-night sound level
Leq	equivalent continuous sound level

LMA	Local Mobility Analysis
LOS	level of service
MACTs	Maximum Achievable Control Technologies
MBARD	Monterey Bay Air Resources District
mgd	million gallon per day
MHPA	Multi Habitat Preservation Area
MMC	Mitigation Monitoring Coordinator
MMRP	Mitigation Monitoring and Reporting Program
MMT	millions of metric tons
MOB	Medical Office Building
MPH	miles per hour
MSCP	Multiple Species Conservation Program
MT	metric tons
MT CO ₂ e	million metric tons equivalent
MTS	Metropolitan Transit System
MW	megawatt
MWD	Metropolitan Water District
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NESHAP	National Emissions Standards for Hazardous Air Pollutants
NF ₃	nitrogen trifluoride
NHL	National Historic Landmarks
NHPA	National Historic Preservation Act
NHTSA	National Highway safety Administration
NO	nitric oxide
N ₂ O	nitrous oxide
NO ₂	nitrogen dioxide
NOP	Notice of Preparation
NOx	oxides of nitrogen
NPDES	National Pollution Discharge Elimination System
NRHP	National Register of Historic Places
NSLUs	noise sensitive and uses
NTP	Notice to Proceed
NUP	Neighborhood Use Permit
O ₃	ozone
OC	Open Space – Conservation
OPR	State Office of Planning and Research
OR	Open Space - Residential

Pb	lead
PDP	Panned Development Permit
PEIR	Program Environmental Impact Report
PFCs	perfluorocarbons
PM/p.m.	afternoon
PM _{2.5}	particulate matter less than 2.5 microns in diameter
PM ₁₀	particulate matter of 10 microns in diameter or smaller
ppm	parts per million
PPV	peak particle velocity
PRC	Public Resources Code
PTS	Project Tracking System
PUD	Public Utilities Department
PVC	polyvinyl chloride
RAQS	Regional Air Quality Strategy
RCP	Regional Comprehensive Plan
RE	Resident Engineer
RHNA	Regional Housing Needs Assessment
RM	Residential – Multiple Unit
ROG	Reactive Organic Gas
RP	Regional Plan
Regional Plan	San Diego Forward: The Regional Plan
RWQCB	Regional Water Quality Control Board
SANDAG	San Diego Association of Governments
SB	Senate Bill
SCAQMD	South Coast Air Quality Management District
SCR	Substantial Conformance Review
SCS	Sustainable Communities Strategy
SDAB	San Diego Air Basin
SDCGHGI	San Diego County Greenhouse Gas Inventory
SDAPCD	San Diego Air Pollution Control District
SDCRAA	San Diego County Regional Airport Authority
SDCWA	San Diego County Water Authority
SDFD	San Diego Fire-Rescue Department
SDG&E	San Diego Gas and Electric
SDIA	San Diego International Airport
SDMC	San Diego Municipal Code
SDP	Site Development Permit
SDPD	San Diego Police Department
SEL	Sound Exposure Level
sf	square feet
SF ₆	sulfur hexafluoride
SHPO	State Historic Preservation Office

SIP	State Implementation Plan
SLCP	short-lived climate pollutants
SO ₂	sulfur dioxide
SOI	Secretary of the Interior
SOV	single-occupancy vehicle
SR	State Route, as in SR-163
SWIS	Solid Waste Information System
SWP	State Water Project
SWPPP	Storm Water Pollution Prevention Plan
T-BACT	toxics best available control technology
TACs	toxic air contaminants
TIA	Traffic Impact Analysis
TCRs	tribal cultural resources
TDM	Transportation Demand Management
TM	Tentative Map
TOG	total organic gas
TPA	Transit Priority Area
TSM	Transportation Study Manual
UBC	Uniform Building Code
UCSD	University of California San Diego
USFWS	U.S. Fish and Wildlife Service
UWMP	Urban Water Management Plan
VCP	vitriified clay pipe
Vdb	vibration decibels
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	vehicle miles traveled
VOC	volatile organic compounds
WMP	Waste Management Plan
WSA	Water Supply Assessment

RESPONSES TO COMMENTS

On September 12, 2022, the City distributed the Draft Environmental Impact Report (Draft EIR) to public agencies, interested organizations, groups, and interested individuals, as well as submitted the document to the State Clearinghouse. In accordance with Section 15105 of the California Environmental Quality Act (CEQA) Guidelines, a 45-day public review period was provided for the Draft EIR from September 12, 2022 through October 27, 2022. During the public review period, a total of five comment letters were received on the Draft EIR. Some of the comments do not pertain to the adequacy of analysis in the Draft EIR or to other aspects pertinent to the potential effects of the proposed project on the environment pursuant to CEQA; however, a good faith effort has been made by the City to respond to the comments submitted.

LIST OF COMMENTERS

The list of commenters and the unique letter designators for each letter are shown in Table RTC-1, *Comment Letters Received*. Individual comments within each letter are bracketed and subsequently numbered in the right-hand margin of the comment letter. Bracketed/numbered comment letters are placed side-by-side with the responses to the letter.

Table RTC-1. Comment Letters Received

Letter	Author	Date
STATE AND LOCAL AGENCIES		
A	Maurice A. Eaton Branch Chief Local Development and Intergovernmental Review California Department of Transportation	October 26, 2022
B	Lauren Kahal Lievers Principal Environmental Planner UC San Diego Campus Planning	October 5, 2022
ORGANIZATIONS, GROUPS, AND INDIVIDUALS		
C	Angelina Gutierrez Tribal Historic Preservation Office, Deputy THPO/Monitor Supervisor San Pasqual Bands of Mission Indians	September 20, 2022
D	Molly Greene Lozeau Drury LLP	September 22, 2022
E	Amalia Bowley Fuentes Lozeau Drury LLP	October 27, 2022

LETTERS OF COMMENTS AND RESPONSES

<p>CALIFORNIA STATE TRANSPORTATION AGENCY California Department of Transportation DISTRICT 11 4050 TAYLOR STREET, MS-240 SAN DIEGO, CA 92110 (619) 709-5152 FAX (619) 688-4299 TTY 711 www.dot.ca.gov</p> <p>October 26, 2022</p> <p style="text-align: right;">11-SD-163 PM 2:989 Scripps Mercy Hospital Campus Draft Environmental Impact Report (DEIR)/SCH# 2021040374</p> <p>Mr. Jeffrey Szymanski Senior Planner City of San Diego, Development Services Department 1222 1st Avenue San Diego, CA 92101</p> <p>Dear Mr. Szymanski:</p> <p>Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Draft Environmental Impact Report (DEIR) for the Scripps Mercy Hospital Campus Project located near State Route 163 (SR-163). The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. The Local Development Review (LDR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities.</p> <p>We look forward to working with the City of San Diego (City) in areas where the City and Caltrans have joint jurisdiction to improve the transportation network and connections between various modes of travel, with the goal of improving the experience of those who use the transportation system.</p> <p>Caltrans has the following comments:</p> <p>Hydrology and Drainage Studies</p> <p>Appendix K - Drainage Study:</p> <ul style="list-style-type: none"> • Show Caltrans Right-of-Way (R/W) on all drainage maps. • Post Development Calculations (100-Year): <ul style="list-style-type: none"> a. Verify V100 for Basins 1 & 2 are calculated correctly. Please show steps of calculation. • Delineate flow paths for each basin for both pre- and post-developed conditions with both elevations and lengths labeled. <p style="text-align: center;"><i>"Provide a safe and reliable transportation network that serves all people and respects the environment"</i></p>	<p>A-1 Comments noted. These comments provide general information regarding Caltrans' mission and inter-agency coordination efforts.</p> <p>A-2 Caltrans rights-of-way labels have been added to drawings.</p> <p>A-3 Post development calculations for Basins 1 and 2 have been checked and verified. V100 for Basin 1 and 2 were calculated using FlowMaster, and based on the storm drain pipe size and slope at the discharge points. Calculations have been added on Appendix C.</p> <p>A-4 Delineation of pre- and post-developed flow paths for each basin has been added to the report, with elevations and lengths labeled.</p>
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LETTERS OF COMMENTS AND RESPONSES

Mr. Szymanski, Senior Planner
 October 26, 2022
 Page 2

- A-5 • Why was a portion of Basin 1 excluded from the hydraulic calculations?
- A-6 • Why is a portion of the canyon included in the watershed delineation for both the pre- and post-developed conditions? This area depicts no project improvements, and therefore should not be included in the total watershed area for Basin 1.
- A-7 • Exhibit B shows a discharge point to an 18" private storm main (per pts #666510) located west of 6th Avenue, Exhibit C does not show the same point of connection. Point of connection in Exhibit C is shown to be approximately 75' south of the point of connection shown in Exhibit B. Will there be two different points of connection to existing city storm drains?
- A-8 • Proposed storm drains should be designed to convey the peak discharge from a 100-year storm event, not a 50-year event. Please revise hydraulic calculations.
- A-9 • Due to the inconsistencies found within the drainage study, Caltrans cannot ascertain that the proposed project development does not have an adverse impact on Caltrans' facilities.
- A-10 • On all plans, show Caltrans' R/W and SR-163 centerline and stationing.
- A-11 • Early coordination with Caltrans is recommended.
- A-12 • Caltrans generally does not allow development projects to impact hydraulics within the State's R/W. Any modification to the existing Caltrans drainage and/or increase in runoff to State facilities (i.e., hydrological and water quality impacts to the highways, bridges, culverts, and drains) will not be allowed.

Environmental

- A-13

Caltrans welcomes the opportunity to be a Responsible Agency under the California Environmental Quality Act (CEQA), as we have some discretionary authority of a portion of the project that is in Caltrans' R/W through the form of an encroachment permit process. We look forward to the coordination of our efforts to ensure that Caltrans can adopt the alternative and/or mitigation measure for our R/W. We would appreciate meeting with you to discuss the elements of the Final EIR that Caltrans will use for our subsequent environmental compliance.

An encroachment permit will be required for any work within the Caltrans' R/W prior to construction. As part of the encroachment permit process, the applicant must provide approved final environmental documents for this project, corresponding technical studies, and necessary regulatory and resource agency permits. Specifically, CEQA determinations or exemptions. The supporting documents must address all environmental impacts within the Caltrans' R/W and address any impacts from avoidance and/or mitigation measures.
- A-14

We recommend that this project specifically identifies and assesses potential impacts caused by the project or impacts from mitigation efforts that occur within Caltrans' R/W that includes impacts to the natural environment, infrastructure including but not

"Provide a safe and reliable transportation network that serves all people and respects the environment"

- A-5 There are no proposed improvements within this portion of Basin 1, and the existing drainage pattern will be maintained.
- A-6 The intent of the CUP drainage report is to compare the existing and post-construction peak runoff rates that are being discharged from the project site. Although there are no proposed improvements within the canyon, a portion of the canyon was included in the hydrology calculations to document the total runoff rate that would be discharged from the Scripps Mercy Hospital campus.
- A-7 Exhibit C has been updated to match Exhibit B.
- A-8 The tributary area for the proposed private storm drain system is under one-square-mile in size and therefore is designed to convey a 50-year frequency storm per Section 2.2.3.b of the City of San Diego Drainage Design Manual. There are no proposed improvements within Caltrans' rights-of-way.
- A-9 The post-construction peak runoff rate would be equal to or less than the existing peak runoff rates. The project would implement all required BMPs in compliance with the City of San Diego storm water treatment and hydromodification requirements. The project would not result in potential impacts to existing Caltrans drainage facilities.
- A-10 Caltrans' rights-of-way have been added to plans. The project site is not fronting SR-163 and the SR-163 centerline is located outside of the plan view. Thus, the SR-163 centerline is not shown on the plans.

LETTERS OF COMMENTS AND RESPONSES

	<p>A-11 Comment noted. There are no proposed improvements that would occur with Caltrans' rights-of-way or affect Caltrans' facilities.</p> <p>A-12 The post-construction peak runoff rate would be equal to or less than the existing peak runoff rates. The project would implement all required BMPs in compliance with the City of San Diego storm water treatment and hydromodification requirements. The project would not impact hydraulics within Caltrans' rights-of-way and would not result in increasing runoff to State facilities.</p> <p>A-13 Comments noted. These comments explain Caltrans' CEQA review process when an encroachment permit is required from Caltrans due to any work required within Caltrans' rights-of-way. The project does not propose any work within Caltrans' rights-of-way. However, it is understood that, should the project affect Caltrans' rights-of-way, the applicant will work with Caltrans to request an encroachment permit.</p> <p>A-14 The project would not result in potential impacts or impacts from mitigation within Caltrans' rights-of-way. The Draft EIR fully disclosed all mitigation measures required for the project. No additional mitigation measures have been added to the final EIR.</p>
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LETTERS OF COMMENTS AND RESPONSES

Mr. Szymanski, Senior Planner
 October 26, 2022
 Page 3

**A-14
 Cont.**

limited to highways, roadways, structures, intelligent transportation systems elements, on-ramps and off-ramps, and appurtenant features including but not limited to lighting, signage, drainage, guardrail, slopes and landscaping. Caltrans is interested in any additional mitigation measures identified for the project's final environmental document.

Hazardous Waste

A-15

The DEIR provided for review did not contain a Hazards and Hazardous Material section for the proposed project. Hazardous waste concerns for this project include asbestos and lead paint in the structures identified for demolition. Asbestos and lead paint are common in structures built and/or remodeled prior to 1980 and after 1994. Public structures including Hospitals are of particular interest under National Emission Standards for Hazardous Air Pollutants (NESHAP). San Diego County Air Pollution Control District (SDAPCD) requires, "Prior to commencement of renovation or demolition operations and prior to submitting the notifications required by Section (e) of Rule 1206, a facility survey shall be performed to determine the presence or absence of ACM, regardless of the age of the facility."

A-16

Unknown underground storage tanks or other wastes may be present in the subsurface. Excavation and grading activities may unearth unknown wastes. As such, local oversight agencies such as San Diego County Department of Public Health or the City, San Diego Fire Authority, etc. should be alerted if hazardous materials/hazardous wastes are discovered during demolition and/or excavation/grading activities.

A-17

If a Caltrans encroachment Permit is required for this project, Caltrans District 11 will require all hazardous materials/hazardous waste documents to be provided to the Environmental Engineering Unit for review and concurrence.

Broadband

A-18

Caltrans recognizes that teleworking and remote learning lessen the impacts of traffic on our roadways and surrounding communities. This reduces the amount of Vehicles Miles Traveled and decreases the amount of greenhouse gas emissions and other pollutants. The availability of affordable and reliable, high speed broadband is a key component in supporting travel demand management and reaching the state's transportation and climate action goals.

"Provide a safe and reliable transportation network that serves all people and respects the environment"

A-15

The Draft EIR addresses hazards and hazardous materials in Chapter 7.0, *Effects Found Not to Be Significant*. Specifically, as stated in subsection 7.5, *Health and Safety*, an EnviroStor database search was undertaken for the project site. (See Appendix P.) Results of the search yielded that the project site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. As a result, the project would not create a significant hazard to the public or the environment.

A-16

There are no known underground storage tanks or other subsurface hazardous wastes. Nonetheless, should construction activities uncover unknown hazardous materials during grading or excavation, the appropriate public agency(ies) would be alerted and materials would be disposed of in accordance with local and state regulations.

A-17

Comment noted. The project does not propose any work within Caltrans' rights-of-way. However, should the project affect Caltrans' rights-of-way, the applicant will work with Caltrans to request an encroachment permit and will provide Caltrans with all required materials needed for issuance of an encroachment permit.

A-18

Comments noted. These comments do not address the sufficiency or adequacy of the EIR. No response is necessary.

LETTERS OF COMMENTS AND RESPONSES

Mr. Szymanski, Senior Planner
October 26, 2022
Page 4

Mitigation

Caltrans endeavors that any direct and cumulative impacts to the State Highway network be eliminated or reduced to a level of insignificance pursuant to the CEQA and National Environmental Policy Act (NEPA) standards.

Right-of-Way

- Per Business and Profession Code 8771, perpetuation of survey monuments by a licensed land surveyor is required, if they are being destroyed by any construction.
- Any work performed within Caltrans' R/W will require discretionary review and approval by Caltrans and an encroachment permit will be required for any work within the Caltrans' R/W prior to construction.

Additional information regarding encroachment permits may be obtained by contacting the Caltrans Permits Office at (619) 688-6158 or emailing D11.Permits@dot.ca.gov or by visiting the website at <https://dot.ca.gov/programs/traffic-operations/ep>. Early coordination with Caltrans is strongly advised for all encroachment permits.

If you have any questions or concerns, please contact Charlie Lecourtois, LDR Coordinator, at (619) 985-4766 or by e-mail sent to Charlie.Lecourtois@dot.ca.gov.

Sincerely,

Maurice A. Eaton

MAURICE EATON
Branch Chief
Local Development Review

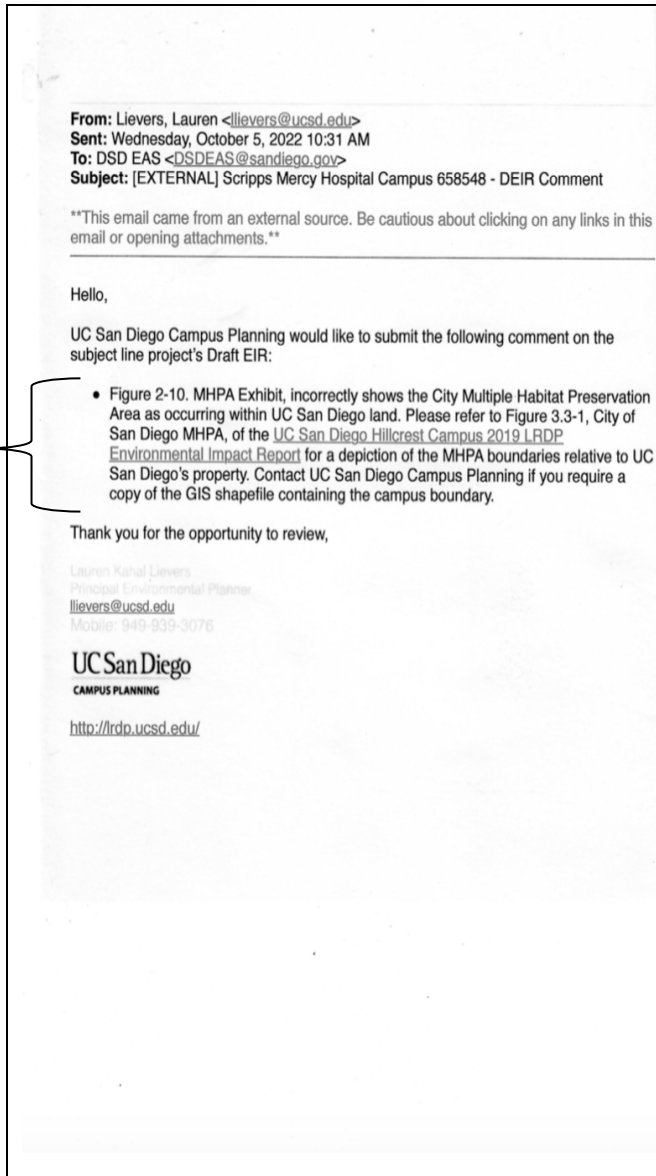
c: California Governor's OPR State Clearinghouse

"Provide a safe and reliable transportation network that serves all people and respects the environment!"

A-19

A-19

Comments noted. These comments provide information regarding Caltrans, survey monumentation, and encroachment permits and provide contact information for Caltrans. The project would comply with applicable surveying regulations. No encroachment is proposed into Caltrans' right-of-way, but it is acknowledged that an encroachment permit would be required for any work within Caltrans' right of way.



B-1

B-1

Figure 2-10, *MHPA Exhibit*, is based on the City's mapping of the MHPA, which has been approved by California Department of Fish and Wildlife (CDFW) and United States Fish and Wildlife Service (USFWS). While it is acknowledged that the UC San Diego Hillcrest Campus 2019 LRDP EIR states that the Hillcrest Campus "appears to be mistakenly mapped" and that "[b]ecause UC San Diego is not an enrolled agency, inclusion of these lands in the City's MHPA does not constitute any obligation on the part of UC San Diego to comply with the City's MSCP preservation goals or objectives," Figure 2-10 is nonetheless accurate. The project is not proposing any changes to the MHPA maps. Changes to the MHPA maps require formal initiation and review and approval by the City, CDFW, and USFWS.

LETTERS OF COMMENTS AND RESPONSES



SAN PASQUAL BAND OF MISSION INDIANS
SAN PASQUAL RESERVATION

September 20, 2022

TRIBAL COUNCIL
 Stephen W. Cope
 Chairman
 Justin Quis Quis
 Vice Chairman
 Jenny Alto
 Secretary-Treasurer
 Roberta Cameron
 Councilman
 Melody S. Arviso
 Councilman

Jeff Szymanski
 City of San Diego
 1222 First Avenue, Mail Station 301
 San Diego, CA. 92101

[Sent via E-mail](#)

RE: Scripps Mercy Hospital Campus

Dear Mr. Szymanski,

The San Pasqual Band of Mission Indians Tribal Historic Preservation Office has received your notification of the project referenced above. This letter constitutes our response on behalf of Desiree M. Whitman THPO of the San Pasqual Band of Mission Indians.

We have consulted our maps and determined that the project as described is not within the boundaries of the recognized San Pasqual Indian Reservation. It is, however, within the boundaries of the territory that the tribe considers its Traditional Use Area (TUA). Furthermore, As the project progresses, we would like to engage in formal government-to-government consultation under Section 106 of the NHPA so that San Pasqual can have a voice in the development of the measures that will be taken to protect these sites and mitigate any adverse impacts. We would appreciate being given access to any cultural resource reports that have been or will be generated during the environmental review process so we can contribute most effectively to the consultation process.

We appreciate your involvement with your initiative and look forward to working with you on future efforts. If you have questions or need additional information, please do not hesitate to contact me by telephone at 760-651-5142 or angelinag@sanpasqualtribe.org

Sincerely,

Angelina Gutierrez
 Angelina Gutierrez
 Tribal Historic Preservation Office, Deputy THPO/Monitor Supervisor
 San Pasqual Band of Mission Indians

PHONE 760-749-3200 • FAX 760-749-3876 • WWW.SANPASQUALBANDOFMISSIONINDIANS.ORG

C-1

C-1 Comments noted. The comment is an introduction to comments that follow.

C-2

C-2 The letter references consultation under Section 106 of the NHPA, Section 106 requires that federal agencies consider the effects of projects on historic properties or effects on federally assisted projects. There is no federal involvement with the Scripps Mercy Hospital Campus project, and Section 106 does not apply. However, City of San Diego projects are subject to Assembly Bill 52 (Chapter 532, Statutes 2014) which requires consultation in regard to Tribal Cultural Resources.

C-3

Tribal Cultural Resources are addressed in Section 7.11 of the EIR. As stated in the EIR, The City of San Diego, as Lead Agency, determined that Tribal Cultural Resources pursuant to subdivision PRC Section 5024.1(c) would not be potentially impacted through project implementation, as the project site has been developed and is located within an urban area. There are no recorded resources on site, nor are there any recorded sites within a one-mile radius of the site.

C-3 Comments noted.



T 619 674-4200
F 619 674-4200
1000 Horizon Street, Suite 100
Oceanside, CA 92032
www.lozeaudrury.com
info@lozeaudrury.com

Via Email

September 28, 2022

Jeff Szymanski, Senior Planner
Development Services Department
City of San Diego
1222 First Ave.
San Diego, CA 92101
JSzymanski@sandiego.gov

Elyse Lowe, Director
Development Services Department
City of San Diego
1222 First Ave.
San Diego, CA 92101
ELowe@sandiego.gov

Elizabeth Malan, City Clerk
City Clerk's Office
City of San Diego
202 C St., Second Floor
San Diego, CA 92101
cityclerk@sandiego.gov

**Re: CEQA and Land Use Notice Request for Scripps Mercy Hospital Campus Project
(Project No. 658548; SCH No. 2021040374)**

Dear Mr. Szymanski, Ms. Lowe, and Ms. Malan:

I am writing on behalf of Supporters Alliance for Environmental Responsibility ("SAFER") regarding the Scripps Mercy Hospital Campus Project (Project No. 658548; SCH No. 2021040374), including all actions related or referring to the proposed construction of two 15-story hospital towers totaling approximately 631,590 and 380,000 square feet respectively (Hospital I and Hospital II), a three-story Hospital Support Building with three levels of subterranean parking, a seven-story Medical Office Building with two levels of subterranean and three levels of above-ground parking, an ambulance drop-off area, a loading dock area, a central energy plant expansion, and utility yards, located on a 21.07-acre site north of Washington Street, south of development along Arbor Drive, west of State Route 163 (SR 163) and Eighth Avenue, and east of Fourth Avenue in the City of San Diego ("Project").

We hereby request that the City of San Diego ("City") send by electronic mail, if possible or U.S. mail to our firm at the address below notice of any and all actions or hearings related to activities undertaken, authorized, approved, permitted, licensed, or certified by the City and any of its subdivisions, and/or supported, in whole or in part, through contracts, grants, subsidies, loans or other forms of assistance from the City, including, but not limited to the following:

- Notice of any public hearing in connection with the Project as required by California Planning and Zoning Law pursuant to Government Code Section 65091.
- Any and all notices prepared for the Project pursuant to the California Environmental Quality Act ("CEQA"), including, but not limited to:
 - Notices of any public hearing held pursuant to CEQA.

D-1

D-1

Comments re-state a description of the project as provided in Chapter 3.0 of the EIR. No response is needed.

D-2

D-2

Copies of all notices associated with the project have been sent to the commenter. Additionally, the commenter is included on the City's list of parties to receive any and all future public notices associated with the project. Last, all public notices pertaining to public hearings, CEQA documents, and project actions are also available on the City's website: <https://www.sandiego.gov/city-clerk/officialdocs/public-notices>.

September 28, 2022
CEQA and Land Use Notice Request for Scripps Mercy Hospital Campus Project (Project No. 658548;
SCH No. 2021040374)
Page 2 of 2

- Notices of determination that an Environmental Impact Report ("EIR") is required for the Project, prepared pursuant to Public Resources Code Section 21080.4.
- Notices of any scoping meeting held pursuant to Public Resources Code Section 21083.9.
- Notices of preparation of an EIR or a negative declaration for the Project, prepared pursuant to Public Resources Code Section 21092.
- Notices of availability of an EIR or a negative declaration for the Project, prepared pursuant to Public Resources Code Section 21152 and Section 15087 of Title 14 of the California Code of Regulations.
- Notices of approval and/or determination to carry out the Project, prepared pursuant to Public Resources Code Section 21152 or any other provision of law.
- Notices of any addenda prepared to a previously certified or approved EIR.
- Notices of approval or certification of any EIR or negative declaration, prepared pursuant to Public Resources Code Section 21152 or any other provision of law.
- Notices of determination that the Project is exempt from CEQA, prepared pursuant to Public Resources Code section 21152 or any other provision of law.
- Notice of any Final EIR prepared pursuant to CEQA.
- Notice of determination, prepared pursuant to Public Resources Code Section 21108 or Section 21152.

Please note that we are requesting notices of CEQA actions and notices of any public hearings to be held under any provision of Title 7 of the California Government Code governing California Planning and Zoning Law. **This request is filed pursuant to Public Resources Code Sections 21092.2 and 21167(f), and Government Code Section 65092**, which require local counties to mail such notices to any person who has filed a written request for them with the clerk of the agency's governing body.

Please send notice by electronic mail or U.S. Mail to:

Rebecca Davis
Molly Greene
Colby Gonzales
Lozeau Drury LLP
1939 Harrison Street, Suite 150
Oakland, CA 94612
rebecca@lozeaudrury.com
molly@lozeaudrury.com
colby@lozeaudrury.com

Please call if you have any questions. Thank you for your attention to this matter.

Sincerely,



Molly Greene
Lozeau | Drury LLP

D-2
Cont.



T 619 836-4000 1039 Harrison Street, Ste. 200 www.lozeaudrury.com
 F 619 836-4265 P.O. and T.O. 941622 Annals@lozeaudrury.com

Via Email

October 27, 2022

Jeff Szymanski, Senior Planner
 Development Services Department
 City of San Diego
 1222 First Ave.
 San Diego, CA 92101
DSDEAS@SanDiego.gov

Re: Comment on Draft Environmental Impact Report, Scripps Mercy Hospital Campus Project (Project No. 658548; SCH No. 2021040374)

Dear Mr. Szymanski:

I am writing on behalf of Supporters Alliance for Environmental Responsibility ("SAFER") regarding the Draft Environmental Impact Report ("DEIR") prepared for the Scripps Mercy Hospital Campus Project (Project No. 658548; SCH No. 2021040374), including all actions related or referring to the proposed construction of two 15-story hospital towers totaling approximately 631,590 and 380,000 square feet respectively (Hospital I and Hospital II), a three-story Hospital Support Building with three levels of subterranean parking, a seven-story Medical Office Building with two levels of subterranean and three levels of above-ground parking, an ambulance drop-off area, a loading dock area, a central energy plant expansion, and utility yards, located on a 21.07-acre site north of Washington Street, south of development along Arbor Drive, west of State Route 163 (SR 163) and Eighth Avenue, and east of Fourth Avenue in the City of San Diego ("Project").

After reviewing the DEIR, we conclude that the DEIR fails as an informational document and fails to impose all feasible mitigation measures to reduce the Project's impacts. SAFER requests that the Development Services Department address these shortcomings in a revised draft environmental impact report ("RDEIR") and recirculate the RDEIR prior to considering approvals for the Project.

We reserve the right to supplement these comments during review of the Final EIR for the Project and at public hearings concerning the Project. *Galante Vineyards v. Monterey Peninsula Water Management Dist.*, 60 Cal. App. 4th 1109, 1121 (1997).

E-1

E-2

E-3

E-1 Comments re-state a description of the project as provided in Chapter 3.0 of the EIR. No response is needed.

E-2 Comment makes assertions that the Draft EIR fails as an informational document and fails to impose mitigation measures that reduce the project's impacts. However, the comment provides no specific information regarding where the EIR is deficient.

The EIR adequately and completely addresses any and all impacts associated with implementation of the Scripps Mercy Hospital Campus project and determines that the project would result in significant impacts with regard to Land Use (operational noise due to an increase in vehicular trips generated by the project on Fourth Avenue), Air Quality (diesel exhaust emissions due to project construction activities), and Noise (construction noise and operational noise impacts associated with traffic noise). Feasible and implementable mitigation measures are presented in the EIR, would be required as part of the project, and would reduce all impacts to below a level of significance, with the exception of operation noise impacts associated with increased vehicle trips on Fourth Avenue. Operational noise impacts would remain significant and unmitigable. As clearly stated in Chapter 10.0, *Alternatives*, implementation of the No Project/No Build alternative would avoid operational noise impacts.

E-3 Comment noted. Comment does not address the sufficiency or adequacy of the Draft EIR. No response is necessary.

LETTERS OF COMMENTS AND RESPONSES

E-3
Cont.



October 27, 2022
Comment on Draft Environmental Impact Report, Scripps Mercy Hospital Campus Project
(Project No. 658548; SCH No. 2021040374)
Page 2 of 2

Sincerely,

Amalia Bowley Fuentes
LOZEAU DRURY LLP

ES EXECUTIVE SUMMARY

This Environmental Impact Report (EIR) has been prepared for the Scripps Mercy Hospital Campus project (project), a private development located in the Uptown Community Plan area. This document analyzes the potential environmental effects associated with implementation of the project (including direct and indirect impacts, secondary impacts, and cumulative effects). Prepared under the direction of the City of San Diego's Environmental Analysis Section, this EIR reflects the independent judgment of the City of San Diego.

ES.1 Purpose and Scope of the EIR

This EIR has been prepared in accordance with, and complies with, all criteria, standards, and procedures of the California Environmental Quality Act (CEQA) of 1970 as amended (PRC 21000 et seq.), State CEQA Guidelines (CAC 15000 et seq.), and City of San Diego's EIR Preparation Guidelines. Per Section 21067 of CEQA and Sections 15367 and 15050 through 15053 of the State CEQA Guidelines, the City of San Diego is the *Lead Agency* under whose authority this document has been prepared. As an informational document, this EIR is intended for use by the City of San Diego decision-makers and members of the general public in evaluating the potential environmental effects of the Scripps Mercy project.

This EIR provides decision-makers, public agencies, and the public in general with detailed information about the potential significant adverse environmental impacts of the Scripps Mercy Hospital project. By recognizing the environmental impacts of the project, decision-makers will have a better understanding of the physical and environmental changes that would accompany the project should it be approved. The EIR includes mitigation measures which, when implemented, would provide the Lead Agency with ways to substantially lessen or avoid significant effects of the project on the environment, whenever feasible. Alternatives to the project are presented to evaluate alternative development scenarios that can further reduce or avoid significant impacts associated with the project.

It is intended that this EIR, once certified, serve as the primary environmental document for those actions associated with the project. According to Section 15162 of the CEQA Guidelines, when an EIR has been certified for a project, no subsequent EIR shall be prepared for that project unless the Lead Agency determines, on the basis of substantial evidence in light of the whole record, one or more of the following:

- (1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;*

- (2) *Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or*
- (3) *New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:*
- (A) *The project will have one or more significant effects not discussed in the previous EIR or Negative Declaration;*
 - (B) *Significant effects previously examined will be substantially more severe than shown in the previous EIR;*
 - (C) *Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or*
 - (D) *Mitigation measures or alternative which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.*

In accordance with CEQA Guidelines Section 15082(a), a Notice of Preparation (NOP), dated April 16, 2021, was prepared for the project and distributed to all Responsible and Trustee Agencies, as well as other agencies and members of the public who may have an interest in the project. The purpose of the NOP was to solicit comments on the scope and analysis to be included in the EIR for the Scripps Mercy project. A copy of the NOP and letters received during its review are included in Appendix A to this EIR. In addition, comments were also gathered at a public scoping session held for the project on April 23, 2021, at the Mission Hills Library. A transcript of the public scoping meeting is included in Appendix B.

Based on an initial review of the project and comments received, the City of San Diego determined that the EIR for the project should address the following environmental issues:

- Land Use
- Transportation/Circulation
- Visual Effects and Neighborhood Character
- Air Quality
- Historical Resources
- Noise
- Greenhouse Gas Emissions
- Public Services and Facilities
- Public Utilities

Based on the analysis contained in Chapter 5.0, *Environmental Analysis*, of this EIR, the project could result in significant impacts to Land Use (Noise), Air Quality and Noise. Mitigation has been provided for all potentially significant impacts to reduce impacts to below a level of significance, except for operational impacts associated with noise. Significant operational noise impacts would result from an increase in traffic volumes on one roadway segment adjacent to the project site that cannot be mitigated.

ES.2 Project Location and Setting

The regional and local settings of the project are discussed in Chapter 2.0, *Environmental Setting*, of this EIR. As shown in Figure 2-3, *Project Location Map*, the Scripps Mercy project site is situated north of Washington Street, south of development along Arbor Drive, west of State Route 163 (SR 163) and Eighth Avenue, and east of Fourth Avenue. Interstate 5 is less than two miles west of the project site; and I-8 is approximately one mile north of the project site. The project site is situated between existing residential development to the north and northwest, medical offices to the west, east and south, and open space slopes to the east and northeast. The Scripps Mercy Hospital Campus operates on the project site. The site is designated for Institutional and Community Commercial and vegetated slopes void of development within the project site are designated as Open Space in the Uptown Community Plan. The existing zones are CC-3-8, CC-3-9, RM-3-9, OR-1-1 and OC-1-1. In addition to the base zones, a Community Plan Implementation Overlay Zone (CPIOZ) is designated within the boundaries of Uptown Community Plan and is intended to regulate specific building heights. CPIOZ Type A applies to the project site.

ES.3 Project Baseline

CEQA Guidelines Section 15125(a) guides the discussion of the environmental setting for the proposed project and advises in the establishment of the project baseline. According to CEQA, *[a]n EIR must include a description of the physical environmental conditions in the vicinity of the project. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant.* The project area is developed with the Scripps Mercy Hospital Campus, comprised of medical office and hospital buildings, surface and structured parking, internal streets and driveways, and landscaping. The baseline condition for the Scripps Mercy Hospital Campus project is the developed site.

ES.4 Project Description

The project objectives associated with the Scripps Mercy Hospital Campus and related actions are:

- Meet the seismic safety requirements of Senate Bill 1953 by replacing the non-conforming existing hospital buildings on the campus by 2030 while maintaining existing health care operations in the community.

- Replace aging-buildings and utilities infrastructure through redevelopment of the Scripps Mercy Hospital Campus in a manner that promotes community wellness, healthcare, and technology in both its facilities and its site development.
- Maximize development intensity on the project site to allow for the optimal expansion of services to meet the needs of the community by providing patient centered, personalized, private care in the appropriate setting.
- Enhance the work environment and increase employment opportunities with expanded services offered.
- Promote a welcoming patient experience by ensuring ease of access and wayfinding efficiency and by establishing the medical campus as a destination for healthcare within the community.
- Establish an integrated campus of programs, facilities, and operations that serve the current community health care needs.
- Establish a Medical Office Building to house ambulatory services and programs designed to support hospital-based programs in a lower cost environment and provide growth opportunities as well as flexibility in meeting evolving outpatient needs.
- Improve campus access and circulation while minimizing transportation effects to adjoining neighborhoods.
- Improve transportation-related facilities including parking structures, transit, and passenger drop-off and pick-up areas in a way that allows for intuitive vehicular, biking, pedestrian, and patient-oriented access.
- Enhance the campus entry for patients, visitors, and employees, as well as the surrounding community.
- Separate facility supply delivery and support services access from patient, visitors and staff to enhance delivery of health care services on campus.

The Scripps Mercy Hospital Campus project includes modifications to the existing campus site plan through demolition and new construction. The Cancer Center [40,000 square feet (sf)] and associated parking structure (17,000 sf) (PTS #641848), would remain, as well as the College Building (40,700 sf), Mercy Gardens (26,790 sf), the Chapel (5,920 sf), Central Energy Plant (17,895 sf), and Parking Structure 12 (223,842 sf; 648 parking spaces). Additionally, the Mercy Chapel, which is a San Diego registered historic resource, would be rehabilitated in accordance with the Secretary of Interior's Standards for the Treatment of Historic Resources. A new parking structure, providing approximately 1,274 parking spaces, and associated pedestrian bridge (439,513 sf) is under construction on the east side of Sixth Avenue to serve the Scripps Mercy Hospital Campus (Project No. 645493, SCR No. 531932). The project would include construction of Hospital I (15 stories, approximately 631,500 sf; 351 beds), Hospital II (15 stories, approximately 380,000 sf; 166 beds), Hospital Support Buildings (three stories with three stories of subterranean parking, approximately 67,000 sf), Medical Office Building (seven stories with two levels of below grade and three levels of above grade parking, approximately 200,000 sf), Ambulance Drop-off area, Loading Dock Area, Central Energy Plant Expansion (approximately 2,400 sf), and two Utility Yards (totaling approximately 18,500 sf).

ES.5 Summary of Environmental Impacts and Mitigation

Chapter 5.0 of this EIR presents the *Environmental Analysis* of the project. Based on the analysis contained in Chapter 5.0 of this EIR, the Scripps Mercy Hospital Campus project would result in significant impacts associated with the following issue areas: Land Use (noise), Air Quality, and Noise. Mitigation has been provided for all potentially significant impacts to reduce impacts to below a level of significance, with the exception of operational impacts associated with Noise. The operational Noise impact is unable to be mitigated to below a level of significance due to the increased traffic volumes on one roadway segment adjacent to the project site that would not be mitigated.

Table ES-1, *Summary of Environmental Impacts and Mitigation Measures*, summarizes the potential environmental impacts of the Scripps Mercy Hospital Campus project by issue area, as analyzed in Chapter 5.0, *Environmental Analysis*, of this EIR. The table also provides a summary of the mitigation measures proposed to avoid or reduce significant adverse impacts. The significance of environmental impacts after implementation of the recommended mitigation measures is provided in the last column of Table ES-1. Responsibilities for monitoring compliance with each mitigation measure are provided in Chapter 11.0, *Mitigation Monitoring and Reporting Program*, of the EIR.

ES.6 Potential Areas of Controversy

Pursuant to CEQA Guidelines Section 15123(b)(2), an EIR shall identify *areas of controversy known to the Lead Agency, including issues raised by the agencies and the public, and issues to be resolved, including the choice among alternatives and whether and how to mitigate for significant effects*. The NOP for the EIR was distributed on April 16, 2021, for a 30-day public review and comment period. Issues of controversy raised in response to the NOP prepared and circulated for the Draft EIR focus on historical resources, tribal cultural resources, and transportation/circulation. These concerns have been identified as areas of known controversy and are analyzed in Chapter 5.0, *Environmental Analysis*, of this EIR.

ES.6.1 Issues to be Resolved by the Decision-Making Body

The City Council must review the project and this EIR and determine if the project or one of the alternatives presented in Chapter 10.0, *Alternatives*, should be approved and implemented. If the project is selected for approval, the City Council will be required to certify the Final EIR, determine whether and how to mitigate significant impacts, and adopt associated Findings pursuant to CEQA Guidelines Section 15091 for the following significant impacts identified in the EIR:

- Land Use (Noise)
- Air Quality
- Noise

Furthermore, a Statement of Overriding Considerations pursuant to CEQA Guidelines Section 15093 would be required for significant and unmitigated land use (noise) and operational noise impacts associated with increased traffic volumes on one roadway segment adjacent to the project site that cannot be mitigated.

ES.7 Summary of Project Alternatives

Alternatives are presented in Chapter 10.0 of this EIR. The alternatives identified in this EIR are intended to further reduce or avoid significant environmental impacts associated with the project.

ES.7.1 Alternatives Considered but Rejected

The *Alternatives* section (Chapter 10.0) of this EIR includes a discussion of alternatives which were considered early in the project design process but which have been rejected. This section includes an Alternative Locations alternative and an Operational Noise Impact Avoidance alternative. These *Alternatives Considered but Rejected* are briefly summarized below.

ES.7.1.1 Alternative Locations

Consideration was given to alternative sites located within the Uptown community, as well as other areas in the City, where the project could occur. In accordance with CEQA Guidelines Section 15126.6(f)(2), identifying possible alternative locations focused on sites where any of the significant effects of the project would be avoided or substantially lessened by developing the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project would need to be considered for inclusion in the EIR.

The project proposes an integrated hospital campus on approximately 21 acres within the Uptown community via partial redevelopment and modernization/enhancement of the fully-developed project site. The project site is centrally located for patients within the urban core of San Diego and has been developed with this specific use for about a century. Additionally, the project site provides synergy with other medical uses within the Medical Complex and Hillcrest neighborhoods, to include University of California San Diego (UCSD) Medical campus and numerous medical office buildings. The project requires a large land mass to serve as a full-service medical campus facility. Additionally, such a site must be accessible by public transit. There are no other sites available within the Uptown community that would allow for such a facility to be developed.

While there may be areas in other portions of the City that remain undeveloped and of appropriate size to develop the project, these sites could be constrained to a greater degree by environmental resources, do not share the same qualities as the project site with respect to transit and accessibility, or would result in similar or greater environmental effects. The project is proposed on a developed medical campus site, which is centrally located within the City and the Uptown

community and is under one ownership. The site has easy access to public streets and freeways and would be served by existing transit. Large landholdings that could accommodate the project could be further removed from existing infrastructure and lack access to transit. The same project in another location could result in greater the vehicle miles traveled (VMT) impacts than the project.

The project would result in a significant unmitigated land use (noise) and operational noise impacts. The operational impact is primarily related to increased vehicular trips generated by the project on surrounding streets. Relocating the project to another site within the City may reduce the operational noise impact. However, as the size and scope of the project would remain the same, an alternative site could require more and longer trips due to lack of proximity to transit and a mix of existing uses, thereby increasing other impacts, such as air quality and greenhouse gas emissions. An alternative site could also result in greater construction noise impacts, depending on location and amount of sensitive receptors proximate to the alternative site.

Thus, locating the project on an alternative site in the City would not avoid or substantially lessen the project's impacts and could result in greater environmental effects. Furthermore, the project applicant does not own any other properties within the City of a size to accommodate the project. For these reasons, there are no other feasible alternative locations for the project as proposed. Finally, the site is being proposed for land uses that are consistent with the Community Plan's identified land use and zoning; there are no land use conflicts that would be avoided by analyzing an alternative site. For these reasons, no alternative site location was analyzed in detail within the EIR.

ES.7.1.2 Retrofit Existing Buildings Alternative

A primary objective of the project is to meet the seismic safety requirements of Senate Bill 1953 by replacing the non-conforming existing hospital buildings on the campus by 2030. The project meets this primary objective through redevelopment of the hospital campus with two new hospital buildings and associated facilities, replacing aging buildings and utilities infrastructure, constructing new up-to-date buildings, and expanding services offered by the hospital to better serve the community.

The Retrofit Existing Buildings alternative was evaluated. This alternative would not replace, rebuild, and expand the Scripps Mercy Hospital campus buildings and facilities. Instead, this alternative evaluates retrofitting the existing hospital buildings to meet Senate Bill 1953. Existing buildings would remain; no new buildings would be constructed; there would be no change to the current amount of beds for the hospital. In this manner, the Retrofit Existing Buildings alternative would be much like the No Project/No Build alternative. However, under the Retrofit Existing Buildings, existing buildings would be remodeled to ensure seismic safety as mandated by the State.

When compared to the project, the Retrofit Existing Buildings alternative would avoid significant and unmitigated land use (noise) and operational noise impacts associated with the project. The Retrofit

Existing Buildings alternative would also avoid mitigable impacts to health risk associated with air quality and construction noise impacts. This alternative would result in the same level of less than significant impact or no impact as the project relative to land use, transportation and circulation, visual effects and neighborhood character, public utilities, and public services and facilities.

However, this alternative would require that the entire hospital be shut down during retrofitting. All patients would need to be re-located, and no new patients could be admitted. Additionally, all emergency services at Scripps Mercy Hospital, including life-flight helicopter operations, would cease. Retrofitting is estimated to take approximately 60 months. Relocating patients and stopping all operations at the hospital would have a devastating effect on medical and emergency services for the community and City, which could be catastrophic during times of emergencies or in the event of a future pandemic.

While the Retrofit Existing Buildings alternative would meet the project's primary objective to replace existing hospital buildings on the campus for seismic safety in accordance with seismic safety requirements of Senate Bill 1953 by 2030, this alternative would not allow the hospital to maintain existing health care operations in the community, as it would have to be removed from operations during retrofitting. Furthermore, this alternative would not meet any of the project's other objectives.

ES.7.1.3 Operational Noise Impact Avoidance Alternative

As presented in Section 5.7, *Noise*, the project would result in significant operational noise impact associated with a 3 decibels (dBA) or greater increase in noise [from the current 73.7 community noise equivalent level (CNEL) to 77.0 CNEL] due to increased vehicular trips on one roadway segment – Fourth Avenue, between Montecito Way and Lewis Street. This impact cannot be mitigated.

An alternative was considered that would avoid the significant increase in noise levels on Fourth Avenue, between Montecito Way and Lewis Street. In order to avoid the impact, vehicular trips generated by the project would need to be reduced by 90 percent at this location [from 14,564 average daily trips (ADT) to approximately 1,400 ADT]. This would result in essentially eliminating any increase in vehicular trips from the project site and thus no redevelopment of the project and no new construction. Such an alternative would not be able to meet State law and seismic building codes requirements or any of the project objectives. Therefore, consideration of an alternative that would avoid the operational noise impact has been rejected from further consideration.

ES.7.2 Alternatives Considered

Alternatives considered for the Scripps Mercy Hospital Campus project, including a discussion of the “No Project” alternative, are addressed in detail in Chapter 10.0, *Alternatives*. Relative to the requirement to address a “No Project” alternative, CEQA Guidelines Section 15126.6(e) states that:

- (A) *When the project is the revision of an existing land use or regulatory plan, policy or ongoing operation, the “no project” alternative will be the continuation of the existing plan, policy or operation into the future.*
- (B) *If the project is other than a land use or regulatory plan, for example a development project on identifiable property, the “no project” alternative is the circumstance under which the project does not proceed.*

Alternatives to the Scripps Mercy Hospital Camps project discussed in this EIR include the “No Project” alternative that is mandated by CEQA with regards to CEQA Guidelines Section 15126.6(e)(A), and other alternatives that were developed during project planning and environmental review for the project. Specifically, the following project alternatives are addressed in this EIR:

- Alternative 1 – No Project/No Build Alternative
- Alternative 2 – Replace Hospital Buildings Only Alternative

ES.7.2.1 Alternative 1 - No Project/No Build

Under the No Project/No Build alternative, the project would not be implemented on the site. None of the improvements or redevelopment associated with the project would occur. Instead, the site would remain as it currently exists, with the Scripps Mercy Hospital in operation.

(It should be noted that the no project alternative would not be feasible due to State law and seismic building codes requiring modifications to the hospital and associated buildings in order to meet OSHPD requirements by January 1, 2030. This alternative is presented in this section to meet the intent of CEQA.)

ES.7.2.2 Alternative 2 – Replace Hospital Buildings Only Alternative

In order to meet the primary objective of the project of replacing existing hospital buildings that do not meet the State’s seismic safety requirements by 2030 and also reduce or avoid significant environmental effects of the project, an alternative was considered that would only replace the existing hospital buildings. The Replace Existing Hospital Buildings Only alternative would demolish and reconstruct the central portion of the campus as two new hospitals and hospital support building in a manner that meets the requirements of Senate Bill 1953. (See Table 10-1, *Replace Hospital Buildings Only Alternative*, and Figure 10-1, *Area of Replace Hospital Buildings Only Alternative*.)

Construction under this alternative would allow for the existing Scripps Mercy Hospital to remain in operation while one of the new hospitals is being constructed. All other portions of the campus would remain as they are today. Like the project, overall bed count would not change from what exists today.

When compared to the project, the Replace Existing Hospital Buildings Only alternative would avoid significant and unmitigated land use (noise) and operational noise impacts associated with the project, as this alternative would result in a decrease in trips. However, like the project, this alternative would result in significant noise impacts associated with construction and significant air quality health risk impacts associated with diesel emissions and would require mitigation measures as would be required for the project to reduce air quality health risk impacts to below a level of significance. This alternative would result in the same level of less than significant impact or no impact as the project relative to land use, transportation and circulation, visual effects and neighborhood character, public utilities, and public services and facilities.

While the Replace Existing Hospital Buildings Only alternative would meet the project's primary objective to replace existing hospital buildings on the campus in accordance with seismic safety requirements of Senate Bill 1953 by 2030, this alternative would not meet any of the project's other objectives. Furthermore, this alternative would not allow the hospital to maintain existing health care operations in the community, as it would have to be removed from operations during retrofitting.

ES.7.3 Environmentally Superior Alternative

The environmental analysis of alternatives presented above is summarized in Table 10-3, *Comparison of Alternatives to Project*. CEQA requires that the EIR identify the environmentally superior alternative among all of the alternatives considered, including the project. If the No Project alternative is selected as environmentally superior, then the EIR shall also identify an environmentally superior alternative among the other alternatives.

The Replace Hospital Buildings Only alternative would avoid the air quality (health risks) environmental impacts identified as significant for the project. This alternative would not avoid the noise (construction and operational) impacts associated with the project. Because the Replace Hospital Buildings Only alternative would avoid the air quality impact, this alternative could be considered the environmental superior alternative. While the Replace Hospital Buildings Only alternative would meet the project's primary objective to replace existing hospital buildings on the campus for seismic safety in accordance with seismic safety requirements of Senate Bill 1953 by 2030, this alternative would not meet any of the project's other objectives.

Table ES-1. Summary of Environmental Impacts and Mitigation Measures

Environmental Impacts	Mitigation Measures	Level of Significance After Mitigation
<p>Land Use The project would result in significant impacts associated with land use impacts relative to operational noise due to an increase in vehicular trips generated by the project on Fourth Avenue.</p>	<p>There is no standard procedure to ensure that increased traffic noise outside the project bounds affecting existing NSLUs is sufficiently attenuated to meet City standards. Therefore, there are no feasible mitigation measures to reduce this traffic noise level to a less than significant impact. Impacts related to land use due to traffic noise at Fourth Avenue would remain significant and unmitigable.</p>	<p>Significant and unmitigable.</p>
<p>Air Quality The project would result in significant air quality impacts associated with potential cancer risks for sensitive receptors to diesel exhaust emissions due to project construction activities.</p>	<p>MM 5.4-1: Diesel Exhaust Emissions Reduction. During construction activities, efforts shall be made to reduce diesel exhaust emissions from all construction equipment greater than 100 horsepower with use of Tier 4 Interim or better equipment, including equipment with an installed diesel particulate filter (DPF), where feasible, and by use of other emission reduction practices. Construction equipment that is certified less than Tier 4 Interim may only be used if unavailable from vendors, in which case equipment with DPFs installed shall be used whenever possible. Additionally, measures shall be employed to reduce DPM emissions, that may include, but would not be limited to, reduction in the number and/or horsepower rating of construction equipment, limiting the number of daily construction haul truck trips to and from the proposed project using cleaner vehicle fuel, and/or limiting the number of individual construction project components occurring simultaneously. <u>A qualified air quality monitor shall be on-site during grading and demolition phases to confirm that construction equipment greater than 100 hp employs Tier 4 Interim or better equipment and that construction equipment that is certified less than Tier 4 Interim is being used only where Tier 4 Interim equipment is unavailable from vendors. When such equipment is being used, such equipment shall be installed with DPFs whenever possible. The monitor shall also determine the need to be on-site during construction, if multiple construction equipment with larger engines is planned for use at the same time.</u> These measures would be used to ensure that health risk impacts from construction do not exceed significance levels.</p>	<p>Mitigated to below a level of significance.</p>
<p>Noise</p>	<p>MM 5.6-1: The following measures shall be planned and reviewed by a qualified acoustic consultant to limit noise levels to meet requirements of the SDMC. These</p>	<p>Mitigated to below a level of significance.</p>

Environmental Impacts	Mitigation Measures	Level of Significance After Mitigation
<p>The project would result in significant construction noise impacts.</p>	<p>measures shall be applied to all phases of the project site demolition and construction work.</p> <ul style="list-style-type: none"> • Ensure that all equipment items have the manufacturers’ recommended noise abatement measures, such as mufflers, engine covers, and engine vibration isolators intact and operational. • Turn off idling equipment, whenever possible. • Construction activities shall be limited to daytime hours, 7 a.m. to 7 p.m. No noise generating construction activities shall take place on Sundays and holidays. • Include in tenders, employment contracts, subcontractor agreements and work method statements clauses that assure the minimization of noise and compliance with directions from management to minimize noise. • Give preference to the use quieter technology or other measures rather than lengthening construction duration (i.e. it is not recommended to lower noise by having fewer pieces of equipment running at a time thereby leading to extended construction duration). • Regularly train workers and contractors (such as at toolbox talks) to use equipment in ways that minimize noise. • Ensure that site managers periodically check the site, nearby residences and other sensitive receptors for noise problems so that solutions can be quickly applied. • Keep truck drivers informed of designated vehicle routes, parking locations, acceptable delivery hours and other relevant practices (e.g. minimizing the use of engine brakes and periods of engine idling). • Consider alternatives to diesel and gasoline engines and pneumatic units such as hydraulic or electric-controlled units where, feasible and reasonable. • Examine and implement, where feasible and reasonable, alternatives to pile driving using a diesel hammer, such as hydraulic hammer, hydraulic press-in, or vibratory piledriver. • To reduce the impact of backup alarms, examine and consider implementing, where feasible and reasonable, ambient sensitive back-up alarms, signal workers, turning circles and side loading/unloading trucks. • To reduce the line-of-sight noise transmission to residences and other sensitive receptors, temporary noise barriers shall be erected as required prior to demolition of the Parking Lot 4.1, Behavioral Health Building, 550 Washington 	

Environmental Impacts	Mitigation Measures	Level of Significance After Mitigation
	<p>Street, Emergency Department, Existing Hospital, and Facility and Generator Building, and prior to construction of MOB, Hospital I, Hospital Support Building, and Mercy Manor.</p> <ul style="list-style-type: none"> • Temporary noise barriers can be constructed from boarding (plywood boards, panels of steel sheeting or compressed fiber cement board) with no gaps between the panels at the site boundary. Stockpiles and shipping containers can also be used as effective noise barriers. • Planned barrier type, height, and placement shall be outlined in a Noise Report prepared by a qualified acoustic consultant at the time of issuance of building permits for the aforementioned buildings. • A qualified noise monitor shall be on-site in areas identified for noise barriers to ensure that noise levels are reduced to meet City standards. 	
<p>Noise The project would result in significant operational noise impacts associated with traffic noise.</p>	<p>There is no standard procedure to ensure that increased traffic noise outside the project bounds affecting existing NSLUs is sufficiently attenuated to meet City standards. Therefore, there are no feasible mitigation measures to reduce this traffic noise level to a less than significant impact. Impacts related to traffic noise at Fourth Avenue would remain significant and unmitigable.</p>	<p>Significant and unmitigable.</p>

1.0 INTRODUCTION

This chapter provides a brief scope of the project, the purpose and legal authority for this Environmental Impact Report (EIR), the EIR scope and process, and an explanation of how the EIR is organized.

1.1 Purpose and Legal Authority

An EIR is an informational document and provides decision-makers, public agencies, and the public in general with detailed information about the potential significant adverse environmental impacts of the project and associated actions. This document has been prepared in accordance with, and complies with, all criteria, standards, and procedures of the California Environmental Quality Act (CEQA) of 1970, as amended [Public Resources Code (PRC) 21000 et seq.]; the State CEQA Guidelines [California Administrative Code (CAC) 15000 et seq.]; and the City of San Diego's (City) Environmental Impact Report Preparation Guidelines (2005).

Per Section 21067 of the CEQA Statutes and Section 15367 of the Guidelines, the City is the Lead Agency under whose authority this document has been prepared. The analysis and findings in this document reflect the independent analysis and conclusions of the City.

1.2 Environmental Impact Report Scope

The EIR discusses the potential significant adverse effects of the project. As a project-level EIR, this document focuses primarily on the changes in the environment that would result from the development project. According to Section 15161 of the State CEQA Guidelines, a project EIR should examine all phases of the project including planning, construction, and operation. Where this EIR has determined that certain environmental impacts would be potentially significant, mitigation measures directed at reducing or avoiding significant adverse environmental effects have been identified, where feasible. In addition, feasible alternatives to the project have been developed. An analysis of the impacts of project alternatives compared to those of the project provides a basis for consideration by decision-makers.

The project site is located in the Uptown Community Plan area. The Uptown Community Plan Update (CPU) Program EIR provided a program-level environmental analysis that covers the project site. This EIR incorporates and relies upon relevant analysis from the Uptown CPU EIR related to the evaluation of cumulative impacts and expands upon and refines such information where warranted. The Uptown CPU Program EIR is available for review on the City's website.

As described in Section 15152 of the State CEQA Guidelines, tiering refers to “using the analysis of general matters in a broader EIR (such as one prepared for a general plan or policy statement) with later EIRs and negative declarations on narrower projects; incorporating by reference the general discussions from the broader EIR; and concentrating the later EIR or negative declaration solely on the issues specific to the later project.” This tiered approach allows incorporation by reference the information, analysis, and mitigation measures from the “first tier” document that are relevant to a specific project.

1.3 Notice of Preparation/ Scoping Meeting

The City concluded that the project could result in potentially significant environmental effects. As Lead Agency, the City prepared a Notice of Preparation (NOP) which was distributed to responsible and trustee agencies, as well as various other governmental agencies and interested organizations and individuals, on April 16, 2021. The purpose of the NOP was to solicit comments on the scope and analysis to be included in the EIR for the project. A copy of the NOP and letters received during its review are included in Appendix A. In addition, comments were also gathered from a public scoping presentation posted on the City’s website from April 16, 2021, through May 16, 2021.

Comment letters received during the NOP public scoping were received from the Native American Heritage Commission (NAHC) and the San Diego County Archaeological Society Inc. The letters expressed the importance and need for California Native American Tribes consultation (in the case of the NAHC) and inclusion of historic/cultural resources evaluation in the EIR. These concerns are addressed in Chapter 5.0, *Environmental Analysis*, of this EIR.

Based on initial review of the project by the City and comments received during review of the NOP and at the public scoping meeting, the City determined that the EIR for the project should address the following environmental issues.

- Land Use
- Transportation/Circulation
- Visual Effects/Neighborhood Character
- Air Quality
- Historical Resources
- Noise
- Greenhouse Gas Emissions
- Public Services and Facilities
- Public Utilities
- Cumulative Effects

1.4 Responsible and Trustee Agencies

State law requires that all EIRs be reviewed by trustee and responsible agencies. A Trustee Agency is defined in Section 15386 of the State CEQA Guidelines as a State agency having jurisdiction by law over natural resources affected by a project that is held in trust for the people of the State of California. Per Section 15381 of the CEQA Guidelines, the term 'Responsible Agency' includes all public agencies other than the Lead Agency which have discretionary approval power over the project.

1.4.1 California Department of Health Care Access and information

California Department of Health Care Access and information (HCAI) improves access to quality healthcare for Californians by ensuring hospital buildings are safe, offering financial assistance to individuals and healthcare institutions, and collecting and publishing healthcare data. HCAI regulates the design and construction of healthcare facilities to ensure they are safe and capable of providing services to the public and provides finance tools for capital projects. Because the project involves the construction of hospital buildings, HCAI would be considered a Responsible Agency.

1.4.2 Federal Aviation Administration

The Federal Aviation Administration (FAA) provides air traffic services for the world's largest and busiest airspace. Tens of thousands of aircraft are guided safely and expeditiously every day through America's National Airspace System to their destinations. The project involves an alteration to existing helicopter flight routes, requiring FAA oversight and approval. Additionally, the project's proximity to the San Diego International Airport (SDIA) requires notification to the FAA in order to conduct an Obstruction Evaluation/Airport Airspace analysis under Title 14 code of Federal Regulations, Part 77.

1.4.3 California Division of Aeronautics

Caltrans Division of Aeronautics' approval is required for all heliports in California (with certain exceptions). Because the project proposes relocation of the existing heliport, a Heliport Site Approval Permit would be required from Caltrans Division of Aeronautics, following project approval by the City of San Diego. A Heliport Permit would also be required, which authorizes startup of flight operations, following Caltrans' final inspection.

Additionally, the following have been identified as State agencies that may have an interest in the project.

1.4.4 California Public Utilities Commission

The California Public Utilities Commission (CPUC) is a regulatory agency that regulates privately owned public utilities in the state of California, including electric power, telecommunications, natural gas and water companies. The project applicant would be required to coordinate with the CPUC for public utility easement vacations associated with San Diego Gas and Electric (SDG&E) facilities.

1.4.5 Regional Water Quality Control Board

Pursuant to Section 401 of the Clean Water Act (CWA), the local Regional Water Quality Control Board (RWQCB), Region 9 – San Diego, would be responsible for issuing a waiver or certification for any project actions resulting in the discharge of runoff from the site. Conformance with the CWA is established through compliance with the requirements of the National Pollution Discharge Elimination System (NPDES) for discharge of storm water runoff associated with construction activity, project operation, and maintenance activities. Compliance also requires conformance with applicable Best Management Practices (BMPs) and development of a Storm Water Pollution Prevention Plan (SWPPP) and monitoring program plan.

The project would not affect Waters of the U.S., and a CWA Section 404 permit would not be required for the project. As such, the project would also not require a CWA Section 401 Certification.

1.5 Availability and Review of the Draft EIR

This EIR has been made available for review to members of the public and public agencies for 45 calendar days (from September 12, 2022 to October 27, 2022) to provide comments “on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated” (14 California Code of Regulations [CCR] 15204). The draft EIR and associated technical appendices were placed on the City’s CEQA webpage:

<https://www.sandiego.gov/ceqa/draft>

The City, as Lead Agency, will consider the written comments received on the Draft EIR following the end of the public review period. Responses to the public review comments relevant to the adequacy and completeness of the Draft EIR are prepared and compiled into the Final EIR. In addition, any changes to the Draft EIR that result from comments will be incorporated into the Final EIR. All persons who comment on the EIR will be notified of the availability of the Final EIR and the date of the public hearing before the decision-maker.

1.6 Content of EIR

In accordance with Sections 15120 through 15132 of the State CEQA Guidelines, the EIR is formatted to address the required contents of an EIR. Technical studies have been summarized within individual environmental issue sections. The EIR has been organized in the following manner:

- **Executive Summary** is provided at the beginning of this document, which includes the conclusions of the environmental analysis and a comparative summary of the project with the alternatives analyzed in the EIR, as well as areas of controversy and any issues to be resolved.
- **Chapter 1.0, Introduction**, introduces the purpose of the EIR, provides a discussion of the public review process, and includes the scope and format of the EIR.
- **Chapter 2.0, Environmental Setting**, provides a description of the project location and the environment of the project site, as well as the vicinity of the project site, as it exists before implementation of the proposed project.
- **Chapter 3.0, Project Description**, details the physical and operational characteristics of the project, provides the purpose and objectives of the project, and presents the required discretionary actions.
- **Chapter 4.0, History of Project Changes**, chronicles any changes that have been made to the project in response to environmental concerns raised during the City's review of the project.
- **Chapter 5.0, Environmental Analysis**, includes a description of the existing conditions relevant to each environmental topic; presents the threshold(s) of significance, based on the City's *California Environmental Quality Act Significance Determination Thresholds* (July 2016), for the particular issue area under evaluation; identifies an issue statement or issue statements; assesses any impacts associated with implementation of the project; provides a summary of the significance of any project impacts; and presents recommended mitigation measures and mitigation monitoring and reporting, as appropriate, for each significant issue area.
- **Chapter 6.0, Cumulative Effects**, addresses the cumulative impacts caused by the project in combination with other past, present, and reasonably foreseeable future development in the area.
- **Chapter 7.0, Effects Found Not to be Significant**, presents a brief discussion of the environmental effects of the project that were evaluated and were found not to be potentially significant.
- **Chapter 8.0, Significant Irreversible Environmental Changes**, discusses any significant irreversible environmental changes that would be caused by the project, should it be implemented.
- **Chapter 9.0, Growth Inducement**, discusses the ways in which the project could foster economic or population growth.

- **Chapter 10.0, Alternatives**, provides a description and evaluation of alternatives to the project which could avoid or reduce potentially significant environmental impacts associated with implementation of the project.
- **Chapter 11.0, Mitigation Monitoring and Reporting Program**, documents the various mitigation measures required as part of the project.
- **Chapter 12.0, References**, includes a list of the reference materials consulted in the course of the EIR's preparation.
- **Chapter 13.0, Individuals and Agencies Consulted**, includes a list of agencies and individuals contacted during preparation of the EIR and lists those persons and agencies responsible for the preparation of the EIR.

Tables and figures are provided as necessary to illustrate and support text within this EIR. All tables and figures are located at the end of the chapter or section in which they are introduced, with tables followed by figures, as applicable.

2.0 ENVIRONMENTAL SETTING

The Environmental Setting chapter provides a description of the existing physical conditions for the project site and any off-site areas that would be affected by the project. Additionally, this chapter provides an overview of the existing local and regional environmental setting per Section 15125 of the CEQA Guidelines, as well as the regulatory planning context. Also provided in this chapter is a general discussion of the planning context within which the project is evaluated. Greater details relative to the setting of each environmental issue area addressed in this EIR are provided at the beginning of each issue section impact area discussion presented in Chapter 5.0, *Environmental Analysis*, of this EIR.

CEQA Guidelines Section 15125(a) guides the discussion of the environmental setting for the proposed project and advises in the establishment of the project baseline. According to CEQA, an EIR must include a description of the physical environmental conditions in the vicinity of the project. The purpose of this requirement is to give the public and decision-makers the most accurate and understandable picture practically possible of the project's likely near-term and long-term impacts.

2.1 Regional Setting

The project site is located in the Uptown community of the City of San Diego, within San Diego County (see Figure 2-1, *Regional Map*). The City covers approximately 206,989 acres in the southwestern section of San Diego County, in Southern California. The Uptown community is located in the central portion of the City of San Diego and the San Diego Metropolitan Area. The community is located immediately north of downtown San Diego and Balboa Park and approximately five miles east of the Pacific Ocean. The Mission Valley community is located north of Uptown, and the North Park community is located east of Uptown. The communities of Old Town and Midway-Pacific Highway, as well as the San Diego International Airport, are located west of Uptown. As shown in Figure 2-2, *Vicinity Map*, the project site is located in the northeastern portion of the Uptown community.

2.2 Project Location and Surrounding Land Uses

As shown in Figure 2-3, *Project Location Map*, the 21.07-acre Scripps Mercy Hospital Campus project site is located north of Washington Street, south of development along Arbor Drive, west of State Route 163 (SR 163) and Eighth Avenue, and east of Fourth Avenue in the Uptown community. Lewis Street and Fifth Avenue extend into the project site from the west and the south, respectively. Interstate 5 (I-5) is less than two miles west of the project site; and I-8 is approximately one mile north of the project site. The site is located in an urbanized community. Multi-family residential

developments exist to the north and single-family residences are located to the northwest, immediately adjacent to the project, north of Mercy Canyon. Medical offices are located immediately to the west, east, and south of the site. SR 163 and open space slopes are located to the east and northeast.

Regional access to the site is provided by SR 163 immediately east of the project site. Local vehicle access to the site occurs via Washington Street, Fourth Avenue, Fifth Avenue, Sixth Avenue, and Lewis Street.

2.3 Existing Site Conditions

The Scripps Mercy Hospital Campus project site has been previously graded and developed with the Scripps Mercy Hospital campus, consisting of medical office and hospital buildings, surface and structured parking, internal streets and driveways, and landscaping (see Figure 2-3, *Project Location Map*). The majority of the campus is situated on a relatively flat mesa adjacent to canyons and slopes with surface elevations of approximately 290 feet to 295 feet above mean sea level (AMSL). The south-central portion of the campus was developed within an east-west trending drainage feature that is partially infilled and has surface elevations ranging from 235 feet to 240 feet AMSL. Another roughly east-west trending drainage feature is located along the northern property boundary with slopes descending approximately 100 feet from existing buildings at an approximate inclination of 1.5:1 (horizontal: vertical). The canyon slopes and bottom are generally vegetated with grass, brush, and trees. An east-facing cut slope descends to the Sixth Avenue access to SR 163. The campus is sparsely landscaped and has generally been graded to provide sufficient surface drainage.

Redevelopment of Scripps Mercy Hospital Campus would occur in the central portion of the Campus, generally bounded by Washington Street along the south, Fifth Avenue in the southwest corner, Fourth Avenue along the western border, and SR-163 along the east. The Cancer Center, located between Fourth and Fifth Avenue in the southwest portion of the campus, was recently constructed as a 40,000 square foot facility with structured parking. Additionally, a pedestrian bridge currently exists over Sixth Avenue that connects the existing employee surface lot to the existing Behavioral Health Unit surface parking lot. As a part of Sixth Avenue Parking Structure and Bridge project currently under construction (PTS# 645493), the existing pedestrian bridge has been demolished, and a new pedestrian bridge will be constructed to connect the parking structure directly to the main Hospital Building. Access to and from this parking structure will be provided from a new signalized driveway on Sixth Avenue, as well as a driveway on Eighth Avenue. The construction of this parking structure will be completed in advance of major construction efforts of the project with an estimated completion date of Year 2023. No additional development is planned for the Cancer Center and the Sixth Avenue Parking Structure.

Figure 2-4, *Existing Site Plan*, shows the layout of the medical campus and identifies the various buildings and facilities. Table 2-1, *Scripps Mercy Hospital Campus – Existing Buildings and Facilities*, includes building sizes of the existing development.

Existing SDG&E utilities serve the campus from numerous locations adjacent to and through the campus. Three electrical circuits provide service to the campus along Fourth Avenue, Fifth Avenue, Sixth Avenue, Eighth Avenue, Lewis Street and Washington Street. Portions of these circuits are located in easements on the campus. Gas service is provided through both medium and high-pressure lines along Washington Street, Fourth Avenue, Fifth Avenue and Lewis Street. Gas lines are located in easements on the campus at the western side of the campus and along Lewis Street. Electrical and gas facilities which pass through the campus serve both the campus and offsite ratepayers.

2.4 Planning Context

This section provides a brief overview of the planning context relevant to the project.

2.4.1 City of San Diego General Plan

The developed portion of the hospital campus is located in the Multiple Use and Institutional & Public and Semi-Public Facilities Land Use categories of the General Plan. Vegetated slopes void of development within the project site are located in the Park, Open Space, & Recreation General Plan land use categories. (See Figure 2-5, *City of San Diego General Plan Land Use and Street System Map*.) For a detailed discussion of the project's relationship to the General Plan, see Section 5.1, *Land Use*.

2.4.2 Uptown Community Plan

The developed portion of the hospital campus is located in the Institutional and Community Commercial: 0-109 dwelling unities/acre (Du/Ac) land use of the Uptown Community Plan. Vegetated slopes void of development within the project site are located in the Open Space land use area (see Figure 2-6, *Uptown Community Plan Land Use Map*.) For a detailed discussion of the project's relationship to the Community Plan, see Section 5.1, *Land Use*.

2.4.3 Zoning

Zoning for the site is governed by the City's Land Development Code. The base zones on the site are Commercial—Community (CC-3-8 and CC-3-9) located over the majority of the project site; Residential—Multiple Unit (RM-3-9), located on the project boundary in the northern portion of the

site; Open Space—Residential (OR-1-1), located in the northeast portion of the site); and Open Space – Conservation (OC-1-1), located in the northern portion of the site. (See Figure 2-7, *Existing Zoning*.)

In addition to the base zones, a Community Plan Implementation Overlay Zone (CPIOZ) is applied within the boundaries of the Uptown Community Plan per Chapter 13, Article 2, Division 14 of the San Diego Municipal Code (SDMC) to regulate specific building heights. Figure 2-8, *Uptown Community Plan CPIOZ Type A - Building Heights*, identifies areas within the community where ministerial approval is granted for proposed development projects with buildings or structures that do not exceed:

- 65 feet in Hillcrest and Bankers Hill/ Park West

Proposed development projects that exceed the height limitations set forth in the Type A requirements may be approved to the maximum allowed height of the applicable base zone or the maximum allowed floor area of the base zone for zones without a maximum height limit with a Site Development Permit (SDP) per Chapter 13, Article 2, Division 14 of the SDMC, if the project complies with the applicable regulations of the Municipal Code and is consistent with the applicable policies in the General Plan and Uptown Community Plan. Building heights associated with the project would exceed the allowable height of 65 feet. Therefore, the project requires an SDP, as described in Chapter 3.0, *Project Description*.

The project site is also located within a Transit Priority Area (TPA), Residential Parking Standards TPA, Transit Area Overlay Zone, and Residential Tandem Parking Overlay Zone. See Section 5.2, *Transportation and Circulation* for a discussion of the project's relationship with the TPA and these related overlay zones.

2.4.4 San Diego International Airport Airport Land Use Compatibility Plan

The site is located within Airport Influence Area (AIA) Review Area 2 of the SDIA Airport Land Use Compatibility Plan (ALUCP). (See Figure 2-9, *San Diego International Airport ALUCP Airport Influence Area*.) The site is also located within the FAA Part 77 Noticing Area for SDIA. See Section 5.1, *Land Use*, for a discussion of the project's relationship with the SDIA ALUCP and Part 77 Noticing Area.

2.4.5 San Diego Regional Air Quality Strategy

The San Diego Regional Air Quality Strategy (RAQS) was developed to identify feasible emission control measures and provide expeditious progress toward attaining the State ozone standards. See Section 5.5, *Air Quality*, for a complete analysis of project compliance with the RAQS.

2.4.6 San Diego Forward: The Regional Plan

Every four years, SANDAG prepares and updates a Regional Plan in collaboration with the 18 cities and County of San Diego along with regional, state, and federal partners. San Diego Forward: The Regional Plan (Regional Plan) was adopted by San Diego Association of Governments (SANDAG) on December 10, 2021. This plan will guide the region through 2050 and is being developed through a new data-driven process to transform the way people and goods move. The RP serves as a blueprint for how the San Diego region will grow and how SANDAG will invest in transportation infrastructure to provide more transportation choices, strengthen the economy, promote a healthy environment, and support thriving communities. The transportation decisions detailed in the RP serve an overarching goal: create more transportation choices, which ultimately will lead to healthier communities, healthier people, and a healthier environment. The 2021 Regional Plan envisions a transportation system that does not rely on any single mode of transportation but offers a complete and integrated systems to ensure that all San Diego County residents have access to safe transportation choices that protect the environment and support the regional economy.

2.4.7 Water Quality Control Plan for the San Diego Basin

The San Diego Regional Water Quality Control Board's Water Quality Control Plan for the San Diego Basin (Basin Plan) is designed to preserve and enhance water quality and protect the beneficial uses of all regional waters See Section 5.1.1.1 *Regulatory Framework*, and Chapter 7.0, Section 7.12 *Water Quality*, for a discussion of Water Quality relative to the project.

2.4.8 Multiple Species Conservation Program Subarea Plan/Multi-Habitat Planning Area

The Multiple Species Conservation Program (MSCP) Subarea Plan is a comprehensive habitat conservation planning program developed to preserve a network of habitat and open space and protect and preserve biodiversity. The Subarea Plan establishes a preserve area to delineate core biological resource areas and corridors targeted for conservation, known as the City's Multi Habitat Preservation Area (MHPA.)

The site is located within the City's MSCP area, which covers 206,124 acres within the City's jurisdiction. The nearest MHPA area to the site is located less than one-quarter mile to the northeast of the project site in the canyons on the east side of SR-163.. (Figure 2-10, *MHPA Exhibit*).

Table 2-1. Scripps Mercy Hospital Campus – Existing Building and Facilities

Building Name	Size (square feet)
College Building	40,700
Mercy Gardens	26,790
Chapel	5,920
Central Energy Plant	17,895
Parking Lot 12	223,842
Cancer Center	40,000
Parking Structure	17,000
Sixth Avenue Parking Structure & Bridge	439,513
Facility Building	12,984
Generator Building and Cooling Tower	555
Behavioral Health Clinic	56,163
Hospital	507,580
550 Washing	73,448
550 Garage	30,364
Marcy Manor	16,668
Parking Lot 4.1	161,939
Emergency Department	13,796



Figure 2-1. Regional Map

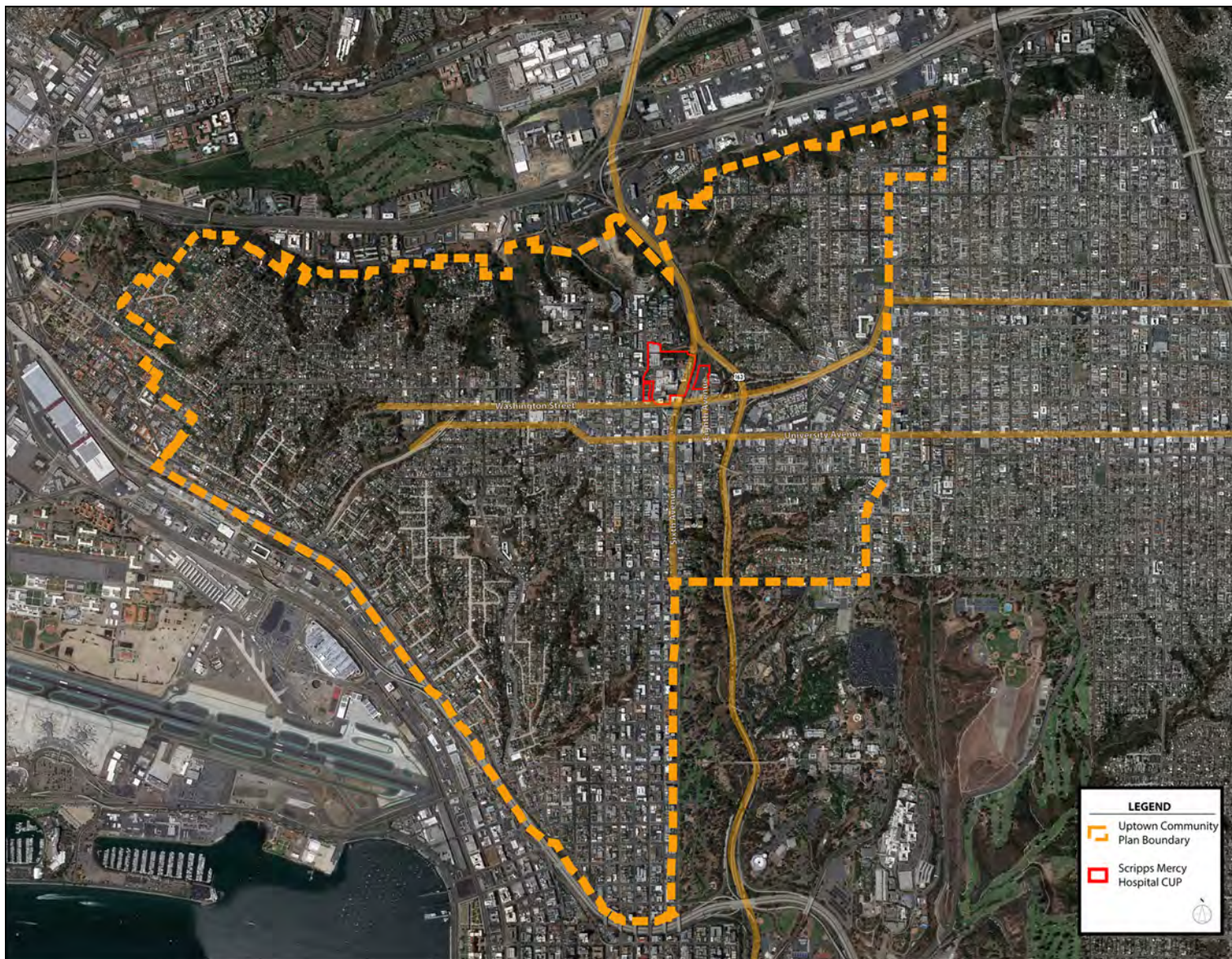


Figure 2-2. Vicinity Map

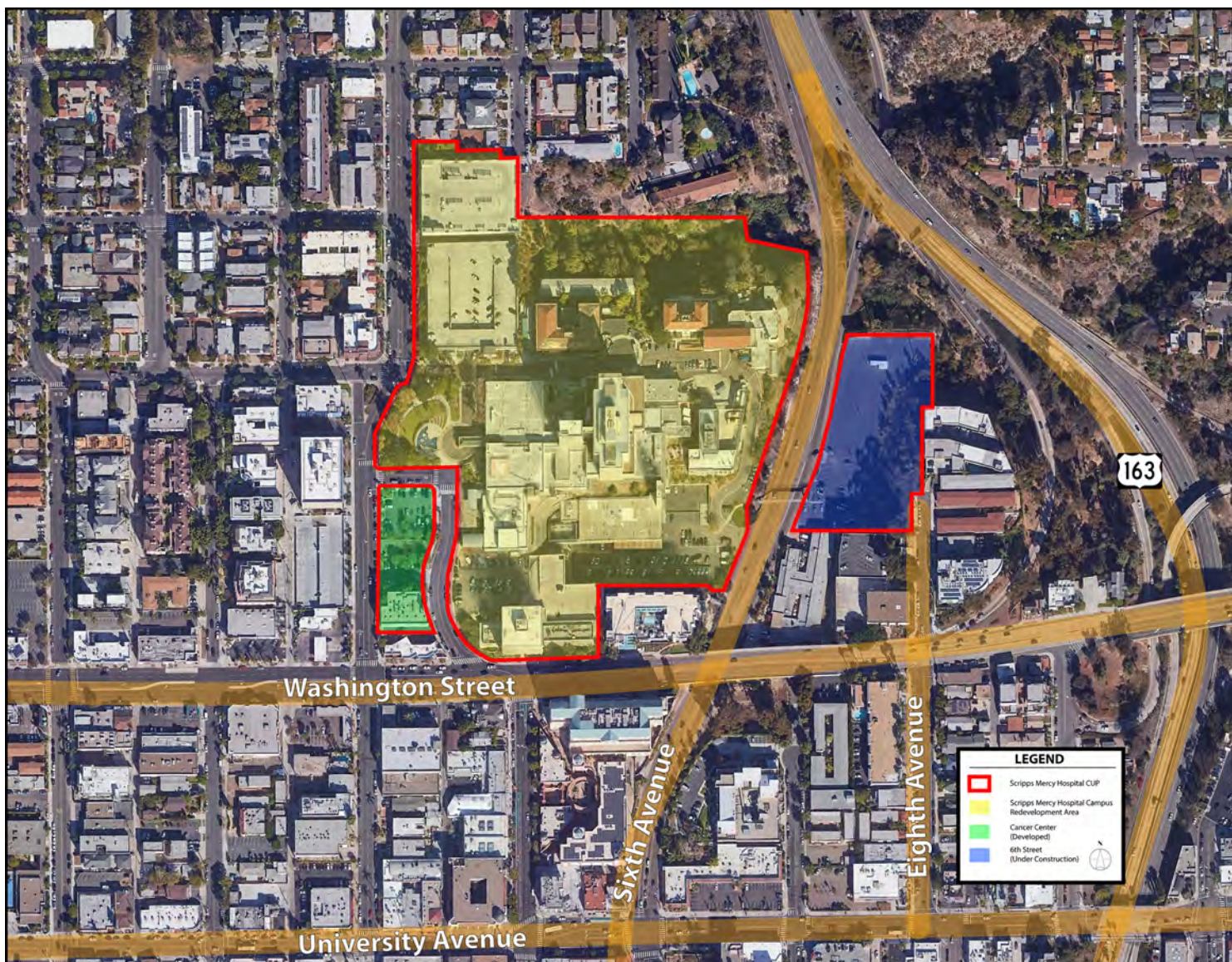


Figure 2-3. Project Location Map



Figure 2-4. Existing Site Plan

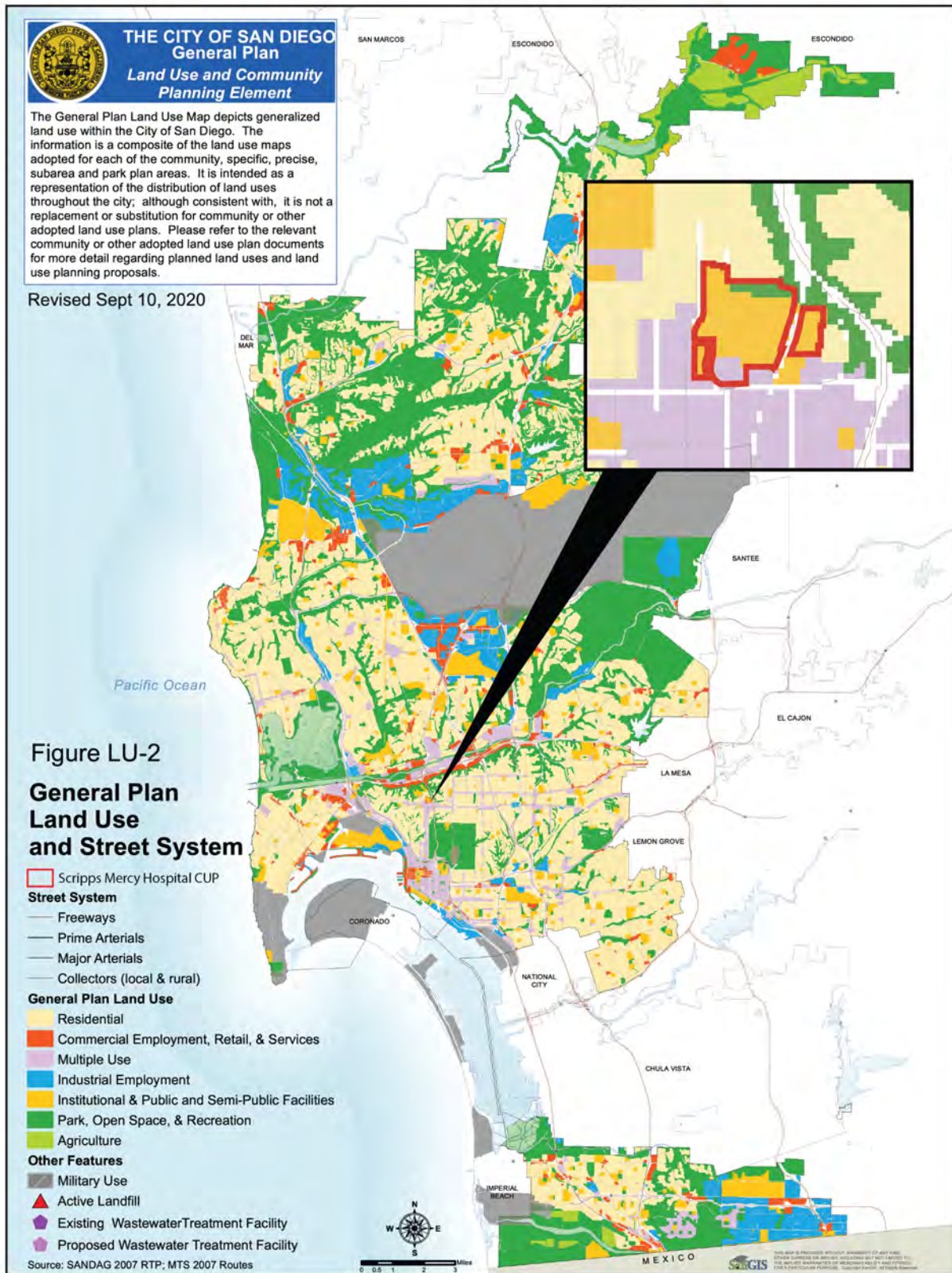


Figure 2-5. City of San Diego General Plan Land Use and Street System Map

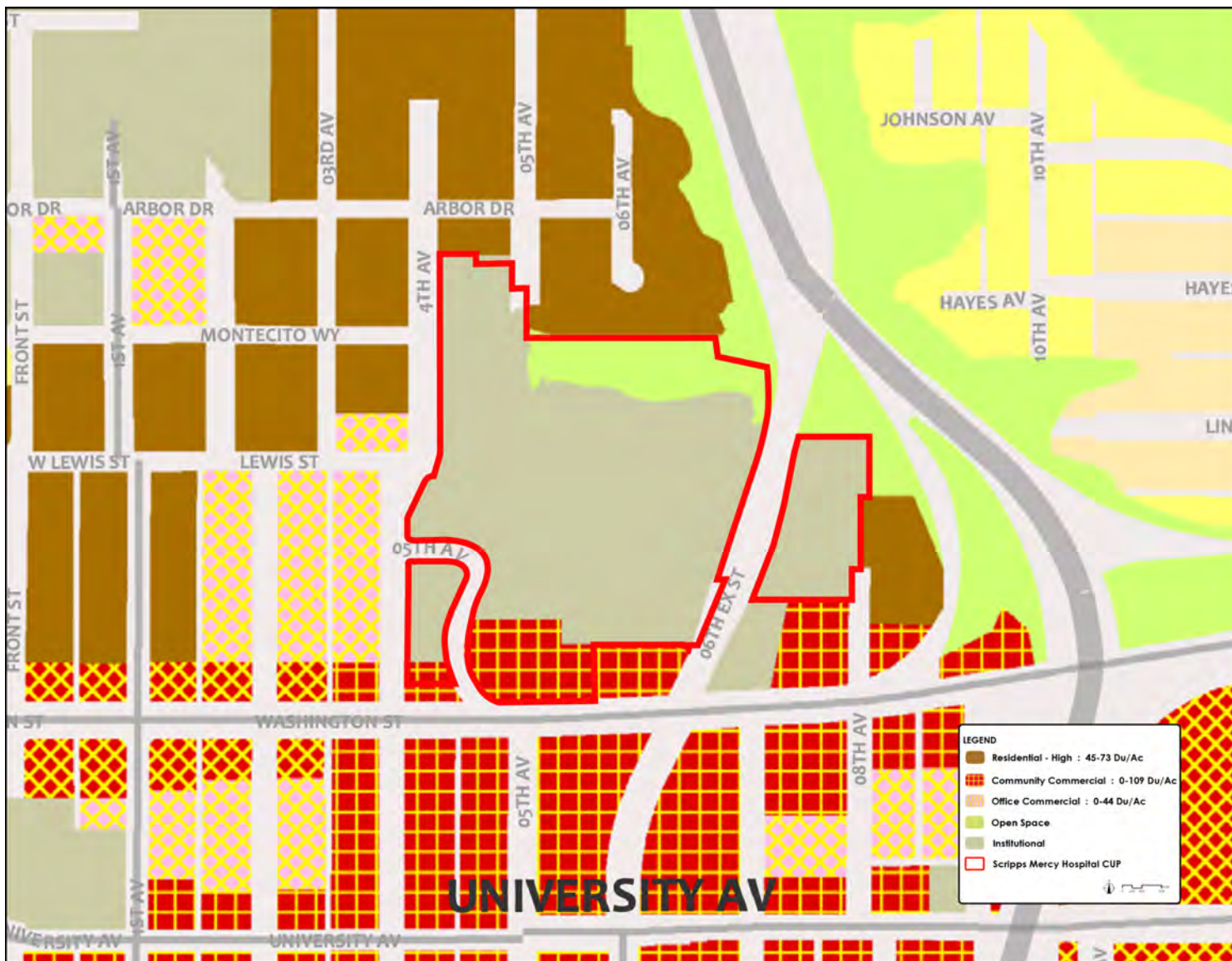
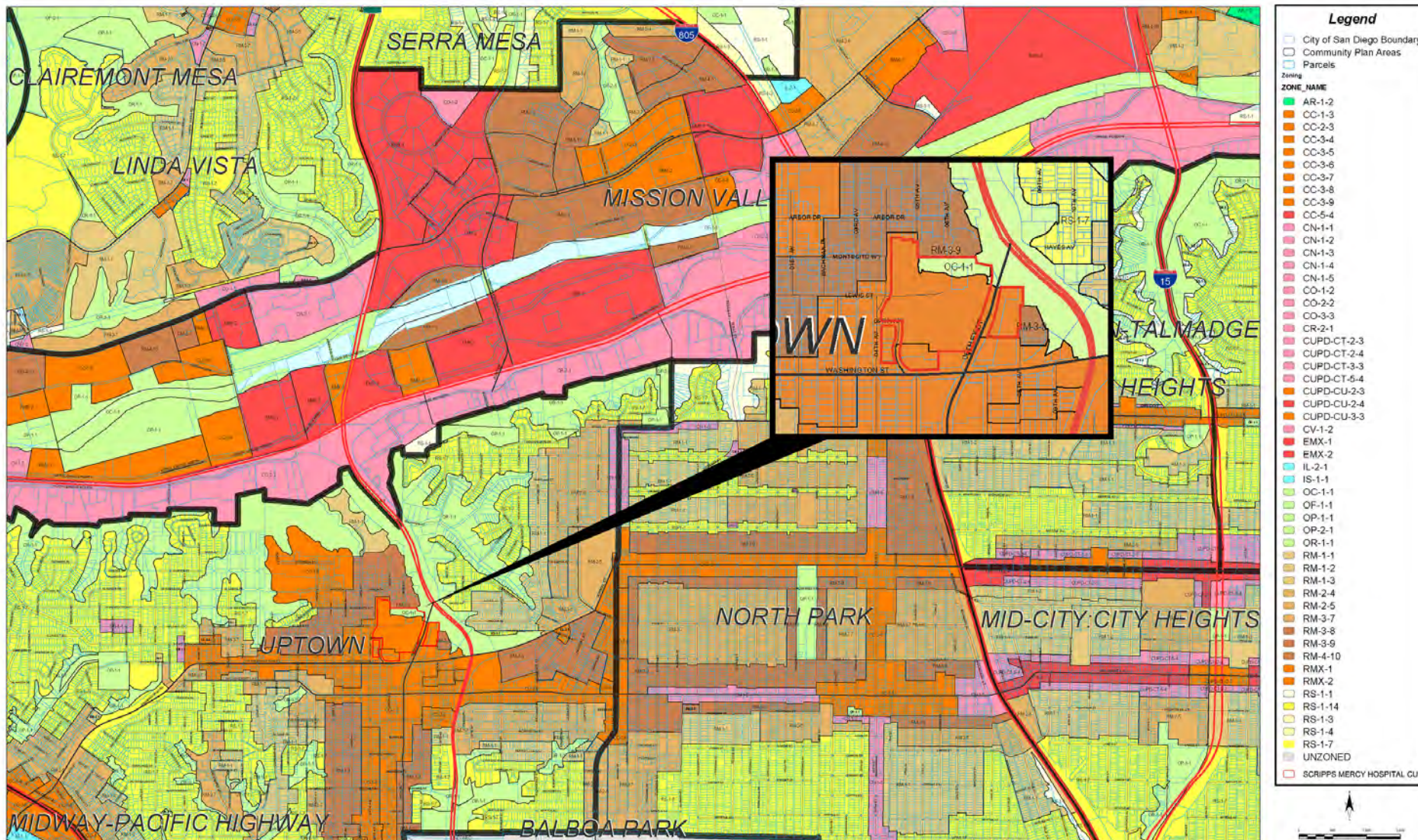


Figure 2-6. Uptown Community Plan Land Use Map



Source: City of San Diego Official Zoning Map, Grid Tile 19, June 29, 2021.

Figure 2-7. Existing Zoning

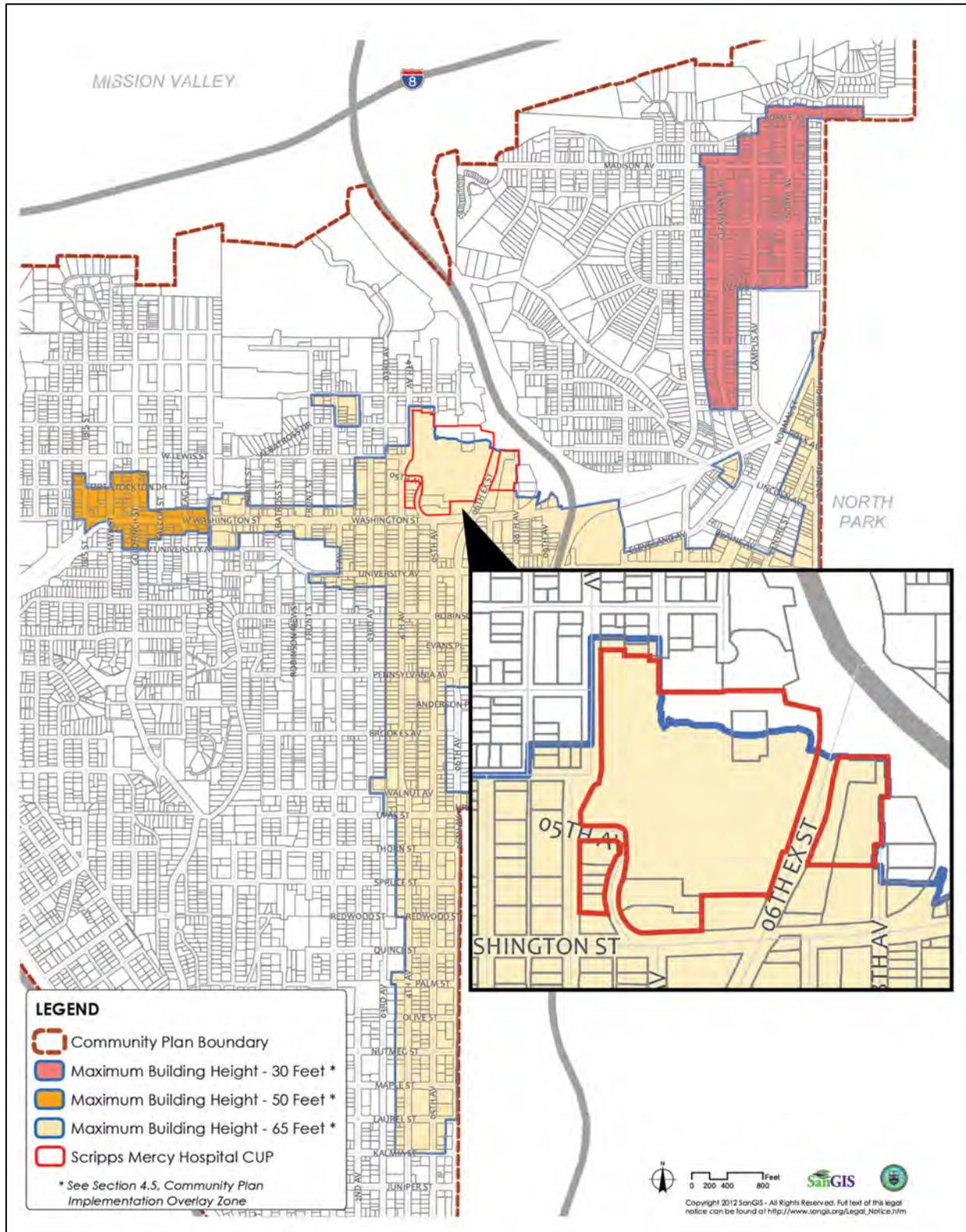


Figure 2-8. Uptown Community Plan CPIOZ Type A - Building Heights

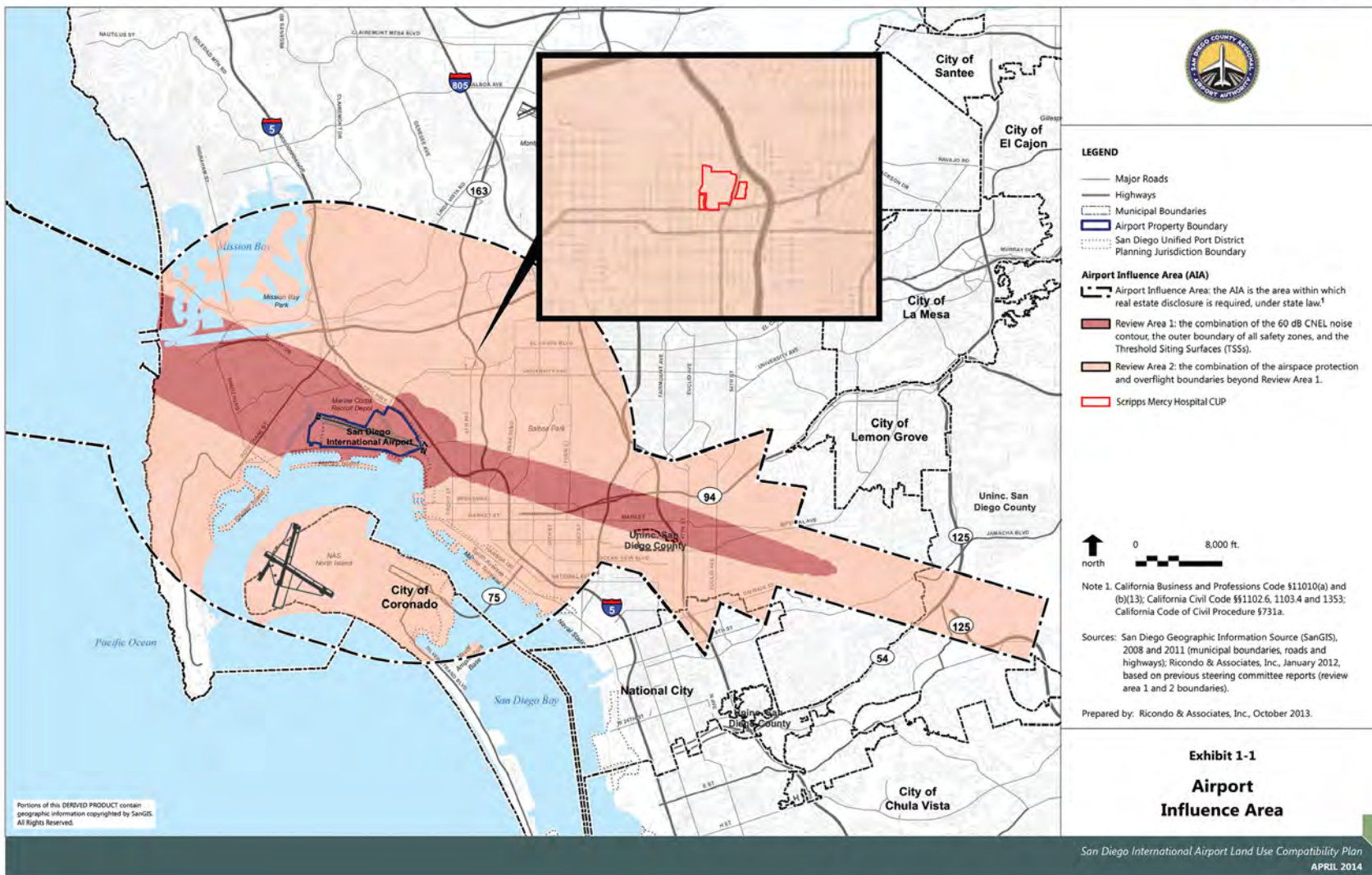


Figure 2-9 San Diego International Airport ALUCP Airport Influence Area

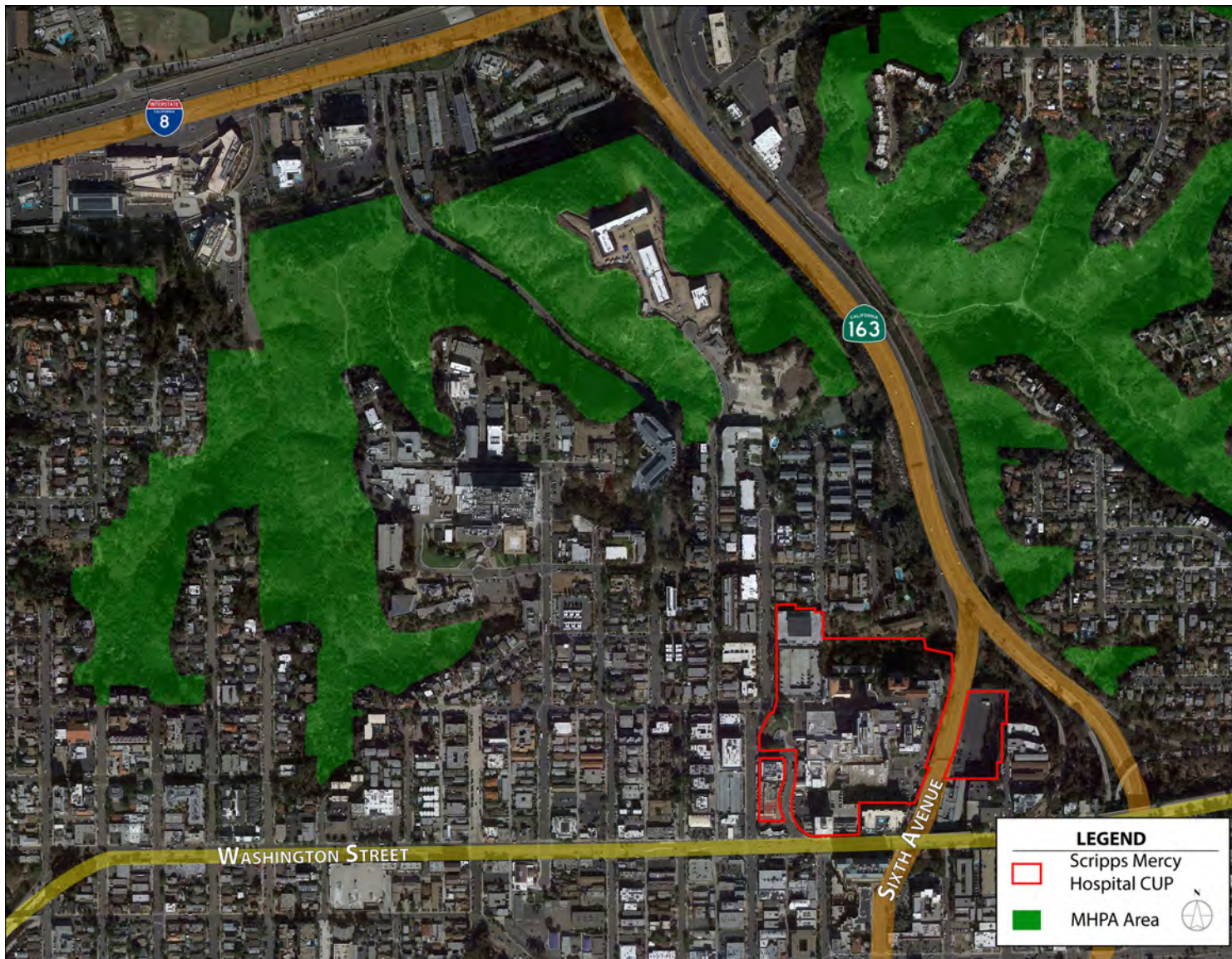


Figure 2-10. MHPA Exhibit

3.0 PROJECT DESCRIPTION

This chapter of the EIR provides a statement of the project goals and objectives, describes the specific characteristics of the project, discusses project construction phasing, and identifies the discretionary actions required to implement the project. This chapter has been prepared pursuant to Section 15124 of the State CEQA Guidelines.

3.1 Purpose and Objectives of the Project

CEQA Guidelines require that the Project Description include a statement of the objectives sought by the project. A clearly defined written statement of the objectives would help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and would aid decision makers in preparing findings and overriding considerations, if necessary. The statement of objectives also needs to include the underlying purpose of the project [CEQA Guidelines §15124(b)].

3.1.1 Project Purpose

The purpose of the Scripps Mercy Hospital Campus project is to allow for demolition of select existing buildings and construction of proposed structures on the approximately 21.07-acre project site to meet State seismic building codes and abide by HCAI requirements that must be met under current law by January 1, 2030. Redevelopment of the campus would allow for the modernization of the hospital in order to continue Scripps Mercy Hospital's more than 125-year legacy serving communities in central and downtown San Diego with hospital, ambulatory, and emergency care services.

3.1.2 Project Objectives

The project objectives associated with the Scripps Mercy Hospital Campus Project and related actions are:

- Meet the seismic safety requirements of Senate Bill 1953 by replacing the non-conforming existing hospital buildings on the campus by 2030 while maintaining existing health care operations in the community.
- Replace aging-buildings and utilities infrastructure through redevelopment of the Scripps Mercy Hospital Campus in a manner that promotes community wellness, healthcare, and technology in both its facilities and its site development.

- Maximize development intensity on the project site to allow for the optimal expansion of services to meet the needs of the community by providing patient centered, personalized, private care in the appropriate setting.
- Enhance the work environment and increase employment opportunities with expanded services offered.
- Promote a welcoming patient experience by ensuring ease of access and wayfinding efficiency and by establishing the medical campus as a destination for healthcare within the community.
- Establish an integrated campus of programs, facilities, and operations that serve the current community health care needs.
- Establish Medical Office Buildings to house ambulatory services and programs designed to support hospital-based programs in a lower cost environment and provide growth opportunities as well as flexibility in meeting evolving outpatient needs.
- Improve campus access and circulation while minimizing transportation effects to adjoining neighborhoods.
- Improve transportation-related facilities including parking structures, transit, and passenger drop-off and pick-up areas in a way that allows for intuitive vehicular, biking, and patient-oriented access.
- Enhance the campus entry for patients, visitors, and employees, as well as the surrounding community.
- Separate facility supply delivery and support services access from patient, visitors and staff to enhance delivery of health care services on campus.

3.2 Project Components

The Scripps Mercy Hospital Campus is comprised of medical office and hospital buildings, surface and structured parking, internal streets and driveways, and landscaping, as shown in Figure 2-4, *Existing Site Plan*. The project includes modifications to the existing campus site plan through demolition and new construction. Additionally, the campus includes previously approved development that is currently under construction. These features are identified in Figure 3-1, *Existing Site Plan with Buildings Proposed to be Demolished, to Remain, and Areas Previously Approved*, and described below.

The project also involves elements of the hospital campus that have been constructed, are undergoing construction, or would not be affected by the project. The Cancer Center [40,000 square feet (sf)] and associated parking structure (17,000 sf), recently constructed (PTS #641848), would remain, as well as the College Building (40,700 sf), Mercy Gardens (26,790 sf), the Chapel (5,920 sf), Central Energy Plant (17,895 sf), Parking Structure 12 (223,842 sf; 648 parking spaces), and the Generator Building and Cooling Tower (555 sf). No additional development, redevelopment, or modifications are proposed for these facilities.

Additionally, the Mercy Chapel, which is a San Diego registered historic resource, would be rehabilitated in accordance with the Secretary of Interior's Standards for the Treatment of Historic Resources. Work to be completed would include removal of non-contributing buildings (i.e., the boiler and laundry building listed under 3.2.1.2, *Demolition*) and rehabilitation of the Mercy Chapel to its 1949 period of significance.

A new parking structure, providing approximately 1,274 parking spaces, and associated pedestrian bridge (439,513 sf) is under construction on the east side of Sixth Avenue to serve the Scripps Mercy Hospital Campus. The Sixth Avenue Parking Structure and associated pedestrian bridge were approved by the City via a Substantial Conformance Review (SCR) (Project No. 645493, SCR No. 531932). Access to and from this parking structure will occur at a new signalized driveway on Sixth Avenue, as well as a driveway on Eighth Avenue. A reconstructed pedestrian bridge will connect the parking structure on the east side of Sixth Avenue to the Scripps Mercy Hospital Campus on the west side of Sixth Avenue. This parking garage construction is permitted under a separate permit process and will be completed in advance of major construction efforts of the project with an estimated completion date of 2023.

Table 3.2-1, *Project Components*, shows the existing campus buildings, the buildings to remain, buildings that would be demolished, new buildings to be constructed, and all buildings that would be a part of the Scripps Mercy Hospital Campus development. Modifications to the Campus are further described below.

3.2.1 Proposed Conditional Use Permit Amendment

A Conditional Use Permit (CUP) to amend CUP No. 304755 would allow for demolition and construction on the Scripps Mercy Hospital Campus site. Provided below are descriptions of the various project components.

3.2.1.1 Demolition

The project proposes the demolition of several buildings on the Scripps Mercy Hospital Campus site to allow for construction of proposed buildings. (See Figure 2-4, *Existing Site Plan*, for the location of existing buildings.) Demolition would include the following:

- Facility Building (three stories, 12,984 sf)
- Behavioral Health Clinic (four stories, 64,341 sf; 50 beds)
- Hospital Building (12 stories above ground and one below, 507,580 sf; 517 beds)
- 550 Washington Building (eight stories, 73,448 sf)
- 550 Garage (two stories, 30,364 sf; 156 parking spaces)

- Mercy Manor (three stories, 16,688 sf)
- Parking Structure 4.1 (three stories, 161,939 sf; 749 parking spaces)
- Emergency Department (three stories, 13,796 sf)
- Boiler and Laundry Building (three stories, 15,130 sf)

3.2.1.2 Construction

The project would include construction of the following facilities:

- Hospital I (15 stories, approximately 631,590 sf; 351 beds)
- Hospital II (15 stories, approximately 380,000 sf; 166 beds)
- Hospital Support Building (HSB) (three stories with three stories of subterranean parking, approximately 67,000 sf)
- MOB (Medical Office Building) (seven stories with two levels of subterranean parking and three levels of above ground parking, approximately 200,000 sf)
- Ambulance Drop-off Area
- Loading Dock Area
- Central Energy Plant Expansion (approximately 2,400 sf)
- Utility Yards (totaling approximately 18,500 sf)

Development proposed with the project is shown in Figure 3-2, *Proposed Site Plan*. Figures 3-3 and 3-4 show conceptual *Site Elevations* for the project. The proposed buildings and the buildings they would replace, are shown on Figures 3-1 and 2-4, respectively, and described below.

- *Hospital I* would be constructed where the existing Behavioral Health Building is located in the south-central portion of the project site. A corridor bridge would connect this building to the proposed *Hospital II* building to the north.
- *Hospital II* would be constructed where the existing hospital building is located in the central portion of the project site, bordered by Lewis Street to the north, the existing central energy plant to the east, the existing Behavioral Health Unit building to the south, and the existing hospital drop-off to the west. A corridor bridge would connect this building to the proposed *Hospital I* building to the south.
- The *Hospital Support Building* (HSB) would be constructed where the existing parking structure and building are located in the southern portion of the campus, east of Fifth Avenue, north of Washington Street, west of a five-story residential building located off-site, southeast of the emergency department, and southwest of a parking lot. An on-grade corridor would connect this building to the proposed *Hospital I* building.
- *Medical Office Building* (MOB) would replace an existing parking lot in the northwest portion of the project site, adjacent to the northeast corner of Fourth Avenue and Lewis Street. This site is currently occupied by a three-level parking structure (Parking Lot 4.1) with one

subterranean level that would be demolished as part of the project. A new parking structure with parking for 1,274 vehicles would be constructed north of the MOB. A pedestrian bridge would connect the MOB to the parking structure. The *Central Energy Plant Expansion*, located in the east-central portion of the project site, would consist of a 2,400-square-foot enlargement to the western site of the existing Central Energy Plant structure. This area is currently a concrete walkway between the existing Central Energy Plant and the hospital building to the west.

3.2.1.3 Buildings to Remain

The following existing buildings would remain as part of the hospital campus:

- College Building (four stories, 40,700 sf)
- Mercy Gardens (three stories, 26,790 sf)
- Chapel (two story, 5,920 sf)
- Central Energy Plant (17,895 sf)
- Parking Lot 12 (223,842 sf)
- Generator Building and Cooling Tower (555 sf)

Additionally, the following previously approved facilities are under construction and a part of the overall medical campus:

- Sixth Avenue Parking Structure and Pedestrian Bridge (439,513 sf and 1,274 parking spaces)
- Cancer Center (40,000 sf) and Parking Structure (17,000 sf and 140 parking spaces)

3.2.1.4 Parking

Vehicular parking is provided throughout the project site. (See Figure 2-4, *Existing Site Plan*.) Existing parking areas to remain include 12 parking spaces at Mercy Gardens, a single parking space for MRI parking, 648 parking spaces in Parking Lot 12, and five designated spaces for official Scripps vehicle parking. As described above, currently under construction are a 140-space Cancer Center parking structure and a 1,274-space parking structure off Sixth Avenue.

The project would develop new parking structures in concert with various project buildings. New parking would include:

- HSB Parking Structure –approximately 248 spaces
- Emergency Department Parking Lot –approximately 10 spaces
- MOB Parking Structure –approximately 350 spaces

- East Lewis Street Parking – approximately seven spaces
- Delivery Parking – approximately 10 spaces

A total of 1,155 vehicle parking spaces are required per the SDMC. The project would meet the SDMC vehicle parking requirements. The project would also meet or exceed the Municipal Code parking requirements for short-term and long-term bicycle parking spaces, motorcycle parking, accessible parking spaces, and parking for electric vehicles.

3.2.2 Circulation and Mobility Improvements

The project would also construct improvements to surrounding public infrastructure, including improvements to Lewis Street, Washington Street, Fourth Avenue, Fifth Avenue, and Sixth Avenue, as well as pedestrian access and bicycle mobility, as described below.

3.2.2.1 Pedestrian Improvements

- The project proposes to construct the following pedestrian improvements on the fronting streets: As a part of implementing the ultimate classification of Washington Street as a Major Arterial, the project would provide half-width improvements to include a contiguous sidewalk that would be constructed along the project frontage on the north side of Washington Street fronting the HSB. The project would construct a 14-foot contiguous sidewalk along the Washington Street frontage. Due to utility and landscape conflicts, the street trees would be within 10 feet of the right-of-way.
- On the east side of Fifth Avenue between Fifth Avenue and Washington Street, the project proposes to construct a 10-foot-wide parkway with a five-foot wide landscape buffer and a five-foot wide non-contiguous sidewalk.
- On the north side of Fifth Avenue between Fourth Avenue and Fifth Avenue, the project proposes to construct a 10-foot-wide parkway with a five-foot wide contiguous sidewalk and five feet of landscape .
- On the east side of Fourth Avenue between Lewis Street and Fifth Avenue, the project proposes to construct a 14-foot-wide parkway, which will include an eight-foot wide landscape buffer and six-foot wide non-contiguous sidewalk.
- On the east side of Fourth Avenue between Lewis Street and the MOB frontage, the project would construct a 14-foot-wide parkway, which would include an eight-foot wide landscape buffer and six-foot wide non-contiguous sidewalk. Street trees are proposed within 10 feet of the right-of-way.

The project also includes pedestrian connections within the site with walkways, paths, and sidewalks to facilitate pedestrian circulation. Additionally, the project would provide an 11-foot pedestrian path north of the Emergency Department parking lot that would provide new pedestrian access from

Lewis Street to Fifth Avenue, as well as connect Hospital I and Hospital II. (See Figure 3-7 *Scripps Mercy Hospital Campus Accessibility Plan*).

3.2.2.2 Bicycle Improvements

To promote bicycle mobility, the project proposes the following bicycle improvements:

- The project would construct half-width improvements along its Washington Street frontage to implement the ultimate classification of a 4-lane Major with buffered Class II bicycle lanes per the Uptown Community Plan. As a part of this improvement, the project would stripe the buffered bike lanes on the north side of Washington Street along the project frontage.
- The project proposes to stripe shared lane markings to delineate a Class III Bike Route on Fifth Avenue between Fourth Avenue and Washington Street, and on Fourth Avenue, between Lewis Street and Fifth Avenue.
- As part of providing bicycle amenities within the site, the project proposes to provide ten showers and over 420 lockers. The project would also meet or exceed the City of San Diego Climate Action Plan (CAP) requirement and SDMC requirements for short-term and long-term bicycle parking spaces.

3.2.2.3 Transit Improvements

The following transit access improvements would be provided by the project:

- The project would upgrade the existing bus stop on the north side of Washington Street and Fifth Avenue (Stop ID 11243) by adding a shelter and maps/way finding signage.
- The project would provide transit information in the hospital and MOB lobbies.
- The project would provide a 30 percent subsidy (which is approximately \$1.00 per day per employee for the current monthly pass of \$72.00) towards transit passes for Metropolitan Transit System (MTS) Bus, Trolley, or COASTER trains for employees to promote transit usage. Additionally, the project would allow transit passes to be purchased on a pre-tax basis through convenient payroll deduction.

3.2.2.4 Street Segment and Intersection Improvements

The project would include improvements to the following intersections:

- Fourth Avenue/Fifth Avenue:
 - Install a traffic signal.
 - Restripe the southbound approach to provide two through lanes and a shared

- through left lane.
- Restripe the westbound approach to provide an exclusive left-turn lane and an exclusive right-turn lane. This would require removal of five metered on-street parking spaces on the north curb.
- Fourth Avenue/Washington Street:
 - Restripe the southbound approach to provide dual left-turn lanes, one through lane and one exclusive right-turn lane and modify the traffic signal accordingly. To accommodate these improvements, on-street parking on the east side of Fourth Avenue between Washington Street and Fifth Avenue would need to be removed. Approximately 16 metered parking on-street parking spaces are anticipated to be removed with this improvement.
- Richmond Street/Washington Street/SR-163 On-Ramp:
 - Currently, the intersection operates at 115-second and 110-second cycle length during the AM and PM peak hours respectively. To alleviate the eastbound left-turn queuing, it is recommended that the cycle length be increased to 150 seconds during the AM and PM peak hours.
- Sixth Avenue/University Avenue:
 - Restripe the southbound approach to provide an exclusive right-turn lane and modify the traffic signal accordingly.

The project would provide the following street segment improvements:

- Fourth Avenue – Fifth Avenue to Washington Street:
 - Restripe to include three southbound lanes and one northbound lane. Approximately 16 metered on-street parking spaces would be removed with this improvement.
- Washington Street – project frontage along the Hospital Support Building
 - As part of implementing the ultimate classification of Washington Street as a Major Arterial, the project will provide half-width improvements to include a Class II bike lane and sidewalk that will be constructed along the project frontage on the north side of Washington Street fronting the Hospital Support Building. The project would construct a 14-foot contiguous sidewalk along the Washington Street frontage. Due to utility and landscape conflicts, the street trees would be located within 10 feet of the right-of-way.

3.2.3 Access

Regional access to the site is provided by SR 163, immediately east of the project site. Vehicular access to the project site is currently provided via Washington Street, Fourth Avenue, Fifth Avenue, Sixth Avenue, and Lewis Street.

Fourth Avenue would provide access to the Cancer Center and associated parking structure (recently constructed, PTS #641848), the MOB, and the existing Parking Lot 12. Fifth Avenue provides an additional access to the Cancer Center, Emergency Department parking lot, and a new unsignalized driveway serving the proposed HSB and its associated parking structure. The HSB and its parking structure would also be served by a new project driveway at the Washington Street/Fifth Avenue intersection. The project would construct a new driveway as the fourth leg (the southbound approach) of the currently signalized Washington Street/Fifth Avenue intersection.

A new parking structure (Sixth Avenue Parking Structure) providing approximately 1,274 spaces has been approved via an SCR No. 531932 (PTS #645493) and is under construction at the existing surface parking located on the east side of Sixth Avenue. Access to and from this parking structure will be provided from a new signalized driveway on Sixth Avenue, as well as a driveway on Eighth Avenue. A pedestrian bridge will connect the parking structure on the east side to the campus on the west side of Sixth Avenue.

3.2.4 Landscaping

The project would include modifications to existing landscaping. Principal goals of the landscape design for the project include: unifying the campus landscape to provide cohesion; clarifying and simplifying wayfinding; and improving overall physician, staff, and visitor experience. The landscape framework, including unifying streetscapes and articulating campus edges, are intended to further define and reinforce the character of the Scripps Mercy Hospital Campus. Given its urban setting and hospital use, the overall landscape plan would balance security with the campus environment by providing clear and secure boundaries with planted buffers and fencing. The *Scripps Mercy Hospital Campus Planting Plan* (Figure 3-4) illustrates proposed landscape plans for the project.

The landscape concept also includes several sustainable practices, such as:

- Biofiltration retention basins that allow for stormwater capture and treatment
- Trees and planting to provide shade and create cool micro-climates
- Light-colored paving materials to reduce the heat island effect
- Native and naturalized drought-tolerant plant palettes reflective of the surrounding natural canyon plant palette, and locally adapted non-native and non-invasive plant species
- Centralized irrigation system and irrigation monitoring technology to provide water efficiency

As a result, a series of landscape palettes have been identified and classified for the various areas across the project site. The *Canyon Accent* palette is primarily located in narrow courtyards between buildings and adjacent properties. This palette utilizes clustered groups of large shade/screening trees, as well as palms, to provide screening and vertical accents.

The *Screening/Buffer – Evergreen Ornamental* palette intends to provide a “green wall,” or soft screen, that feels garden-like. This palette is located within the campus complex between Hospital I and Hospital II. Evergreen shrubs would be combined with loose-massed bark or rock mulch at all planting areas of this palette.

The *Streetscape* palette is intended to provide a clean, low-maintenance, and uniform streetscape palette that communicates continuity throughout the Scripps Mercy Hospital Campus. This palette is located primarily along Fifth Avenue, Lewis Street, and Washington Street, and utilizes street trees to match surrounding evergreen cover in accordance with the Streetscape Manual.

Landscaping in front of Hospital I, as well as some other areas between Hospital II, Hospital I, and HSB, would utilize the *Accent* palette, which would feature evergreen elm trees. This zone implements canopy and flowering accent trees in order to provide shade and comfort in circulation areas, seating areas, and other key focal points.

In the eastern portion of the site, along Sixth Avenue, the *Screening/Buffer – Chapparal Canyon* palette, where the intention is to tie project landscaping into the existing canyon landscape through the utilization of native trees and evergreen shrubs in drifts, masses, and groves to provide screened views in and out of the site.

The *Bio-filtration Planting* zone is intended to use materials that express riparian character of natural streams and arroyos and is located at stormwater treatment areas on the project site.

3.2.5 Brush Management

The SDMC (142.0412) states that any property containing a habitable structure and native or naturalized vegetation is required to provide 100 feet of brush management in two distinct zones: *[...] Brush Management Zone 1 typically extends 35 feet out from the habitable structure towards flammable vegetation and occurs on the level portion of a property. Brush Management Zone 2 is the remaining 65 feet that extends beyond Zone 1, typically comprised of undisturbed vegetation on a slope subject to sensitive biological resource protections.*

As shown in Figure 3-5, *Brush Management Plan*, brush management would be required where the campus interfaces with canyon areas along the northern and eastern boundaries of the project site. Zone 1 would occur immediately east of the Eastern Utility Yard, to the north and south of the Western Utility Yard, and to the north of existing to remain Mercy Gardens. This zone would be a location for ornamental planting areas with permanent irrigation. In addition, this area would be maintained on a regular basis (e.g. thinning, pruning, etc.); no habitable structures would be constructed in this zone; structures such as walls or fences would be non-combustible or have a

minimum one-hour fire resistance rating; understory planting would be less than four feet high; and trees would be located so that mature canopy would be a minimum of 10 feet from structures.

Zone 2 would be located along the north and east perimeters of the project site and would include the existing undisturbed native or naturalized vegetation. No new planting is expected to occur in this zone, so no new irrigation is needed within this area. If any disturbance occurs and re-planting is needed, temporary irrigation would be included during the establishment period. In addition, no structures would be constructed in this zone, this area would be maintained on a regular basis, and thinning and pruning of existing shrubs in this area would occur per the City of San Diego Brush Management Guidelines.

A portion of Alternate Compliance area would be located immediately east of the proposed MOB, as a full defensive space for Zone 1 cannot be provided due to the existing slope gradient of greater than 4:1. Alternate compliance would include dual glazed windows, a sprinklered building, and a Brush Management Plan for the abutting property.

3.3 Public Utility Easement and Public Right-of-Way Vacations

The project would require relocation of portions of public utilities (e.g., storm drain and water and sewer lines) and vacation of Public Service Easements. Easements for these utilities would be vacated and relocated in accordance with City requirements. Numerous remnant easements for public utilities where the utilities no longer exist would be vacated. Public utilities for storm drains and water and sewer lines that serve only Scripps Mercy Hospital campus would be privatized, and the easements for those utilities would be vacated. (See Section 5.9, *Public Utilities*, for a discussion of public utilities that serve the project.) Additionally, on the east side of Sixth Avenue, remnant easements for earth excavation or embankment slopes and incidental purposes would be vacated. This property has been developed, and maintenance of the slope by the City is no longer required.

3.4 SDG&E Facilities Modifications

This project would require relocation and expansion of SDG&E utilities to accommodate the proposed development. All activities pertaining to SDG&E utilities would occur within the hospital campus or on nearby public rights-of-way. Portions of an existing high pressure gas line and electrical circuit that are currently located in Washington Street, Fifth Avenue, and Lewis Street would be relocated and installed underground. Electrical switchgear would be added near the intersection of Fourth Avenue and Lewis Street. A new SDG&E electrical switch yard would be constructed along Sixth Avenue. In addition to the physical infrastructure changes, numerous easements held by SDG&E for utilities that are no longer in use or are being relocated as part of this project would be modified or quitclaimed.

3.5 Helicopter Operations

The proposed project includes the relocation of the existing heliport from the existing hospital roof to the roof of Hospital I, approximately 400 feet to the east-southeast. Construction of the new heliport is not expected to substantially change the type or volume of aircraft in day-to-day operations. The replacement heliport would be designed to accommodate larger aircraft up to and including the Sikorsky UH-60 "Black Hawk" and variants; however, these aircraft would only be utilized in response to a mass-casualty event or other extreme circumstances. All other operations are expected to continue to be carried out by typical Emergency Medical Services (EMS) helicopters, such as REACH/Calstar Air Medical Services and Mercy Air/Air Methods, which currently serve the hospital. Increase in operations is expected to continue commensurate with local population growth. The replacement heliport would allow pilots greater flexibility with respect to approach and departure paths, providing a 180 degree plus flight path arc from northeast through southwest. This is expected to enhance aviation safety, with minimal impact to surrounding land uses. Pursuant to Federal Aviation Regulations and State Law, the proposed heliport design would be subject to review, comment, and/or approval by the FAA, California Department of Transportation (Caltrans) Division of Aeronautics, and San Diego County Airport Land Use Commission.

3.6 Grading Plan

Grading for the project would result in 11.8 acres of on-site area to be graded (Figure 3-6, *Scripps Mercy Campus Hospital Campus Grading Plan*). The amount of cut would be 155,000 cubic yards (cy) with a maximum depth of 49 feet; the amount of fill would be 42,500 cy with a maximum depth of 33 feet. Grading would result in a net export of 112,500 cy. The majority of earthwork for the project is associated with construction of the MOB, the main hospital, and subterranean parking, all within the existing development envelope. No grading would occur in steeply sloping portions of the project site.

3.7 Construction Phasing

Redevelopment of the Scripps Mercy Hospital campus would occur over a period of 20 to 25 years. Because the project involves redevelopment of an existing and operational hospital campus, maintaining existing hospital services is essential. Site restrictions, limitations, and the intensity of proposed uses will dictate relocation of existing services, demolition of existing buildings and facilities, and construction of new buildings and facilities. Demolition and construction would occur in portions of the campus, while existing buildings and services remain in operation. Construction of the proposed buildings and facilities would occur in a manner that allows for current and future healthcare services to co-exist while maintaining existing hospital operations.

Redevelopment of the campus is planned to begin with construction of the new MOB. To enable construction of a new hospital and hospital support building, the 550 Washington Building and Behavioral Health Building located in the central portion of the campus would be demolished, and site development and construction of Hospital I and the Hospital Support Building would occur. Once the new hospital is constructed, emergency services can be relocated into the new hospital and the existing Emergency Department would be demolished. The existing hospital building would then be demolished. Redevelopment of the campus would conclude with construction of a second medical office building and construction of a new second hospital (Hospital II) where the existing hospital has been demolished.

3.8 Comprehensive Sign Plan

As allowed by Section 141.1103 of the SDMC, the project includes a Comprehensive Sign Plan to modify applicable sign requirements and propose signs that, as a whole, are in conformance with the intent of the City's sign regulations, result in an improved relationship among the signs and building facades on the premises, and better serve the hospital campus. Specifically, the Comprehensive Sign Plan proposes the following:

- Exceed maximum allotted wall-sign square footage for a building elevation on a street frontage, either for one specific sign or as a sum total of multiple signs on the given elevation.
- Reduce required minimum distance from the vertical building edge to the sign from the required six feet to approximately five feet-six inches.
- Install signage on a non-frontage façade.
- Install a digital wall sign to replace the existing free-standing sign facing SR 163.
- Request more than the allotted number of high-rise signs.

Overall, for wall-signs, the project would not exceed the maximum amount allowed by the City's sign regulations when totaling all existing and proposed wall signs, including signage proposed for non-public right-of-way signs. Additionally, all ground mounted signs would be at the property line or set back from the property line and would be located outside of the visibility triangles.

3.9 Discretionary Actions

For the Scripps Mercy Hospital Campus project, the following discretionary actions are being requested:

3.9.1 Conditional Use Permit

An amendment to CUP No. 304755 would be required to incorporate the project components as described in Section 3.2, *Project Components*.

3.9.2 Site Development Permit

In accordance with the Uptown Community Plan CPIOZ Type A, an SDP would be required for structure height. The CPIOZ limits structure height in the project location to 65 feet in height. The project would exceed that limitation. Therefore, approval of an SDP is required.

3.9.3 Planned Development Permit

A Planned Development Permit (PDP) is required for development that deviates from the regulations in the underlying zones. The project would include deviations for structure height, floor area ratio (FAR), and driveway width, in the locations and amounts described below.

Maximum Structure Height (San Diego Municipal Code Table 131-05E)

- MOB – Maximum height per CC-3-8 zone: 100 feet; proposed height: 150 feet
- Hospital I – Maximum height per CC-3-8 zone: 100 feet; proposed height: 315 feet
- Hospital II – Maximum height per CC-3-8 zone: 100 feet; proposed height: 252 feet, 8 inches
- HSB – Maximum height per CC-3-8 zone: 100 feet, proposed height 130 feet

Maximum Floor Area Ratio (San Diego Municipal Code Table 131-05E)

- Maximum FAR per CC-3-8 zone: 2.0; proposed FAR: 2.44

3.9.4 Neighborhood Use Permit

A Neighborhood Use Permit (NUP) would be required for a Comprehensive Sign Plan for the Scripps Mercy Hospital Campus. The comprehensive sign plan is being requested to modify applicable sign requirements where the proposed signs, as a whole, are in conformance with the intent of the sign regulations and where the exceptions result in an improved relationship among the signs and building facades on the premises.

3.9.5 Tentative Map

A Tentative Map (TM) would be required to adjust property lines and vacate Public Service Easements.

3.9.6 Public Utility Easements and ~~Public Street Vacations~~

The project would require public utilities relocations and Public Service Easements to be vacated. Additionally, easements for slope embankments would be vacated, as described in Section 3.3, *Public Utility Easement and ~~Public Right-of-Way~~ Vacations*, above.

3.10 Responsible and Trustee Agencies

3.10.1 California Department of Health Care Access and Information

As described in Section 1.4, *Responsible and Trustee Agencies*, of this EIR, HCAI has been identified as a Responsible Agency. HCAI regulates the design and construction of healthcare facilities to ensure they are safe and capable of providing services to the public, and provides finance tools for capital projects. Because the project involves the construction of hospital buildings, HCAI is a Responsible Agency.

3.10.2 Federal Aviation Administration

The FAA provides air traffic services for the world's largest and busiest airspace. Tens of thousands of aircraft are guided safely and expeditiously every day through America's National Airspace System to their destinations. The project involves an alteration to existing helicopter flight routes, requiring FAA oversight and approval. Additionally, the project's proximity to the SDIA requires notification to the FAA in order to conduct an Obstruction Evaluation/Airport Airspace analysis under Title 14 code of Federal Regulations, Part 77.

3.10.3 California Division of Aeronautics

Caltrans Division of Aeronautics' approval is required for all heliports in California (with certain exceptions). Because the project proposes relocation of the existing heliport, a Heliport Site Approval Permit would be required from Caltrans Division of Aeronautics, following project approval by the City of San Diego. A Heliport Permit would also be required, which authorizes startup of flight operations, following Caltrans' final inspection.

The following have been identified as Federal and State agencies that may have an interest in the project.

3.10.4 California Public Utilities Commission

The CPUC is a regulatory agency that regulates privately owned public utilities in the state of California, including electric power, telecommunications, natural gas and water companies. The project applicant would be required to coordinate with the CPUC for public utility relocations and easement vacations.

3.10.5 Regional Water Quality Control Board

Pursuant to Section 401 of the CWA, the local RWQCB, Region 9 – San Diego, would be responsible for issuing a waiver or certification for any project actions resulting in the discharge of runoff from the site. Conformance with the CWA is established through compliance with the requirements of the NPDES for discharge of storm water runoff associated with construction activity, project operation, and maintenance activities. Compliance also requires conformance with applicable BMPs and development of a Storm Water Pollution Prevention Plan (SWPPP) and monitoring program plan.

The project would not affect Waters of the U.S., and a CWA Section 404 permit would not be required for the project. As such, the project would also not require a CWA Section 401 Certification.

Table 3-1. Project Components

Hospital Building	Existing	Existing Buildings to Remain	Existing Buildings to Be Demolished	Proposed Buildings	Proposed Project (Buildings to Remain + Proposed Buildings)
College Building	40,700 sf	40,700 sf	--	--	40,700 sf
Mercy Gardens	26,790 sf	26,790 sf	--	--	26,790 sf
Chapel	5,920 sf	5,920 sf	--	--	5,920 sf
Central Energy Plant	17,895 sf	17,895 sf	--	--	17,895 sf
Parking Lot 12	223,842 sf	223,842 sf	--	--	223,842 sf
Generator Building & Cooling Tower	555 sf	555 sf	--	--	555 sf
Cancer Center	40,000 sf	40,000 sf	--	--	40,000 sf
6th Avenue Parking Structure	439,513 sf	439,513 sf	--	--	439,513 sf
Parking Lot 4.1	161,939 sf	--	161,939 sf	--	--
Behavioral Health Clinic	56,163 sf	--	56,163 sf	--	--
550 Garage	30,364 sf	--	30,364 sf	--	--
550 Washington	73,448 sf	--	73,448 sf	--	--
Emergency Department	13,796 sf	--	13,796 sf	--	--
Hospital	507,580 sf	--	507,580 sf	--	--
Mercy Manor	16,668 sf	--	16,668 sf	--	--
Facility Building	12,984 sf	--	12,984 sf	--	--
Medical Office Building	--	--	--	200,000 sf	200,000 sf
Hospital Support Building	--	--	--	67,000 sf	67,000 sf
Hospital I	--	--	--	631,000 sf	631,000 sf
Hospital II	--	--	--	380,000 sf	380,000 sf
Utility Yard	--	--	--	9,000 sf	9,000 sf
Utility Yard	--	--	--	9,500 sf	9,500 sf
Central Energy Plant Expansion	--	--	--	2,400 sf	2,400 sf
TOTAL	1,668,157	795,215	872,942	1,298,900	2,094,115

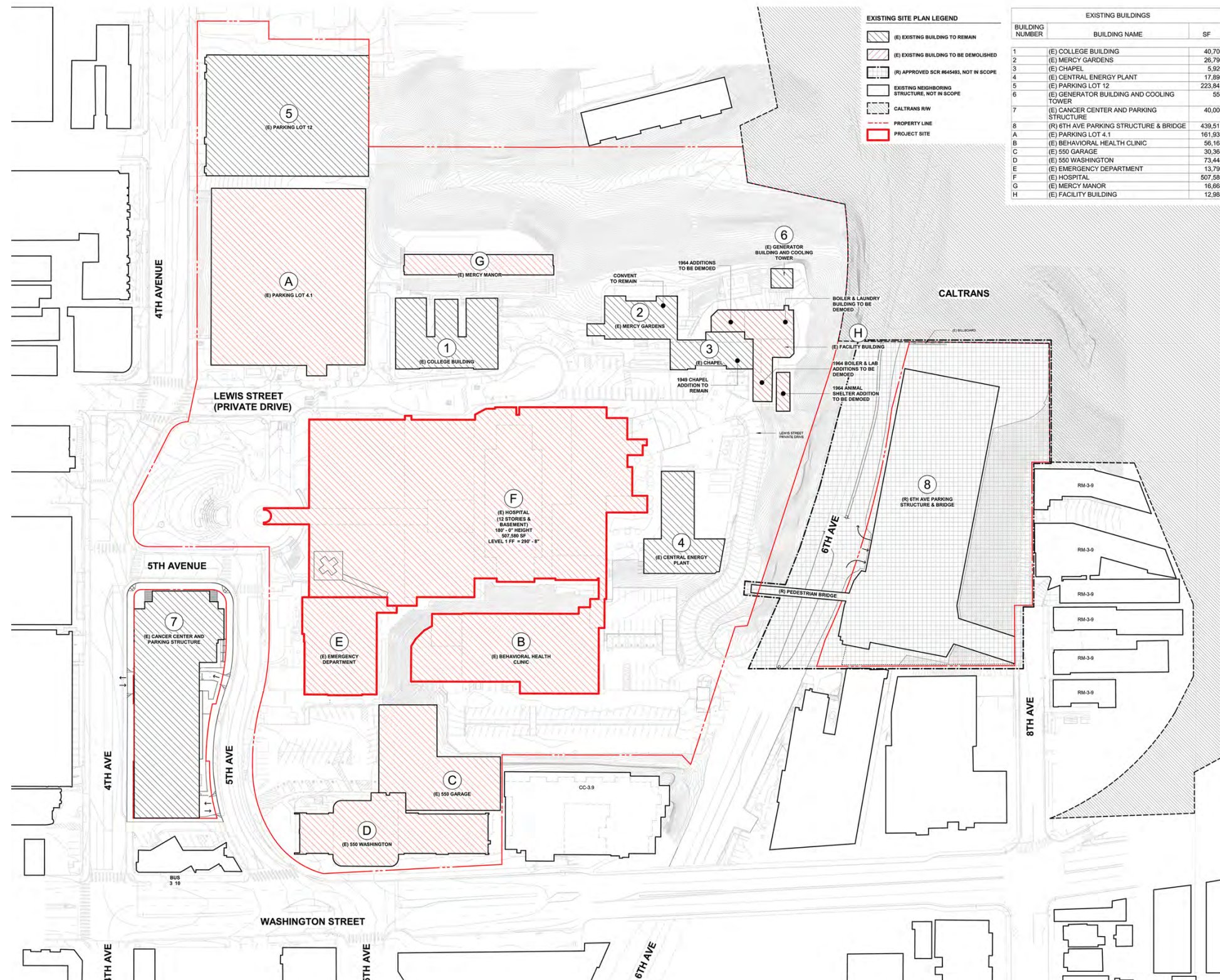


Figure 3-1. Existing Site Plan with Buildings Proposed to be Demolished, to Remain, and Areas Previously Approved

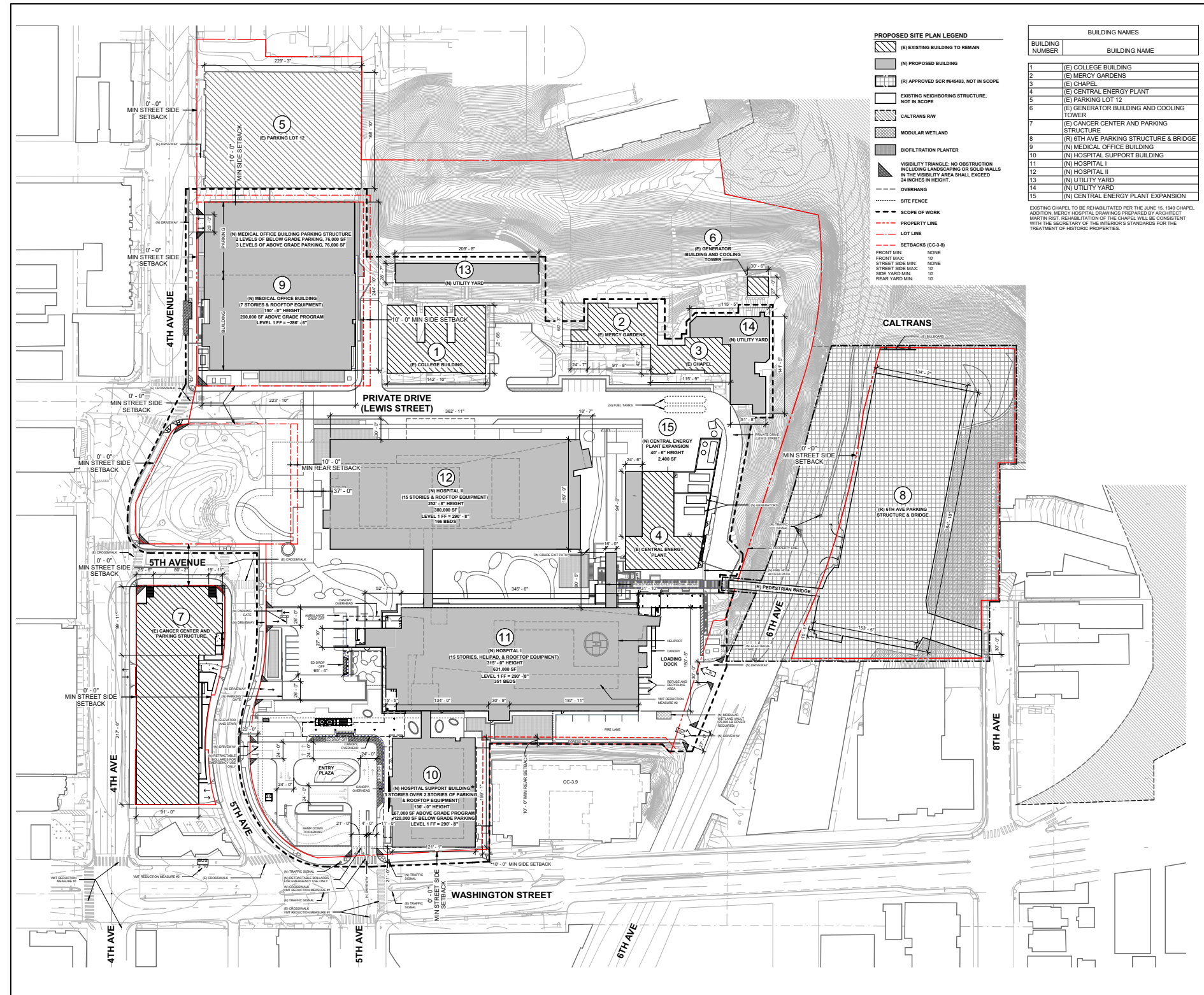


Figure 3-2. Proposed Site Plan

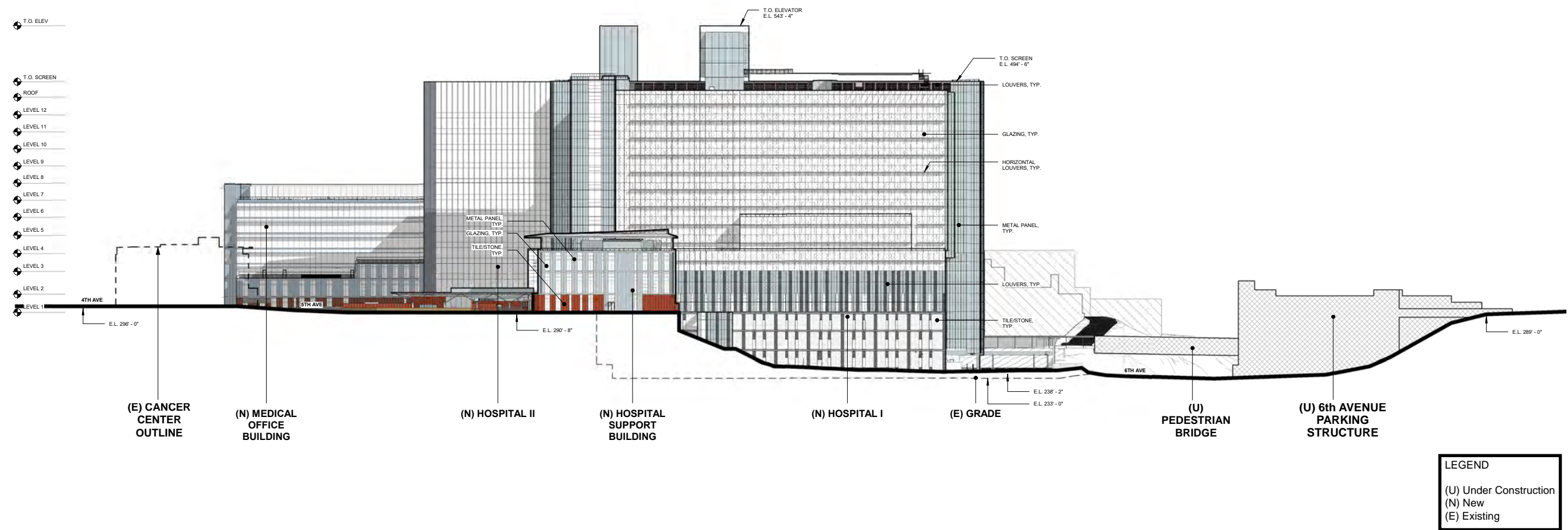


Figure 3-3a. Site Elevations – South

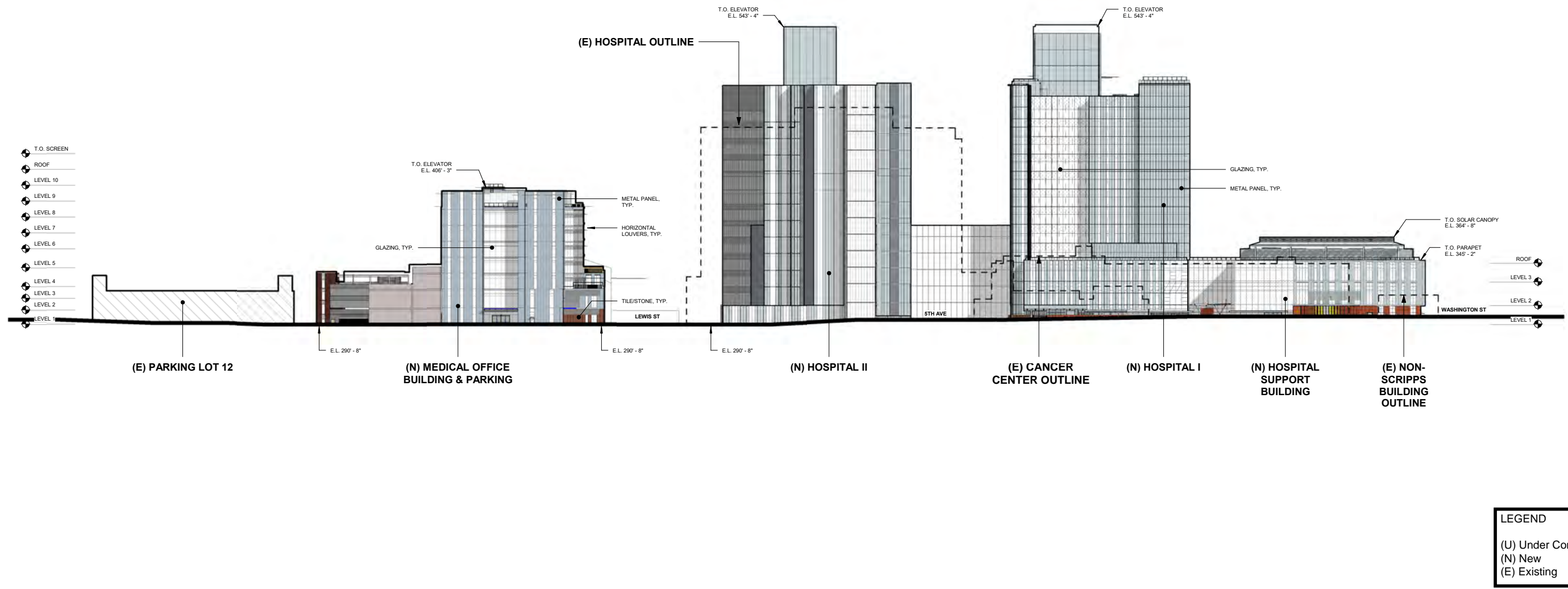


Figure 3-3b. Site Elevations -West

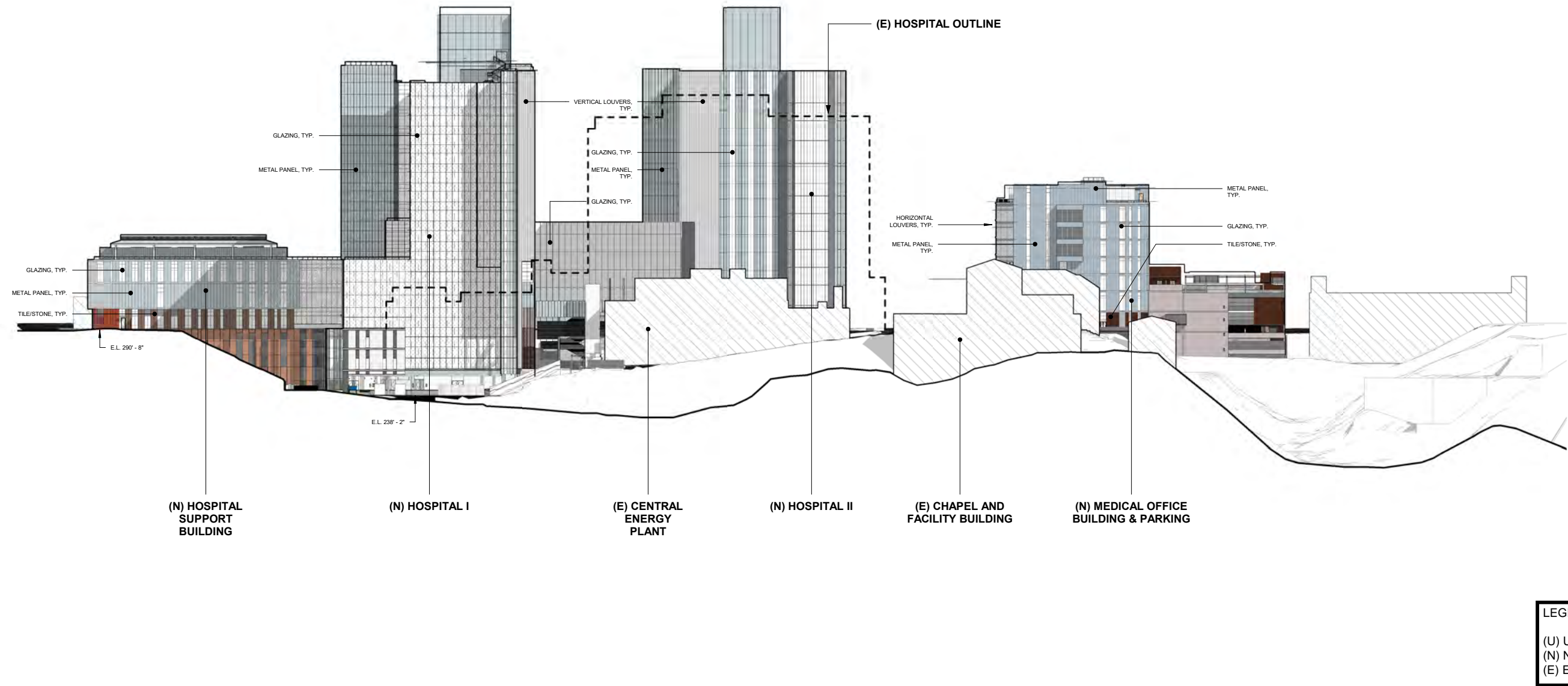


Figure 3-3c Site Elevations - East

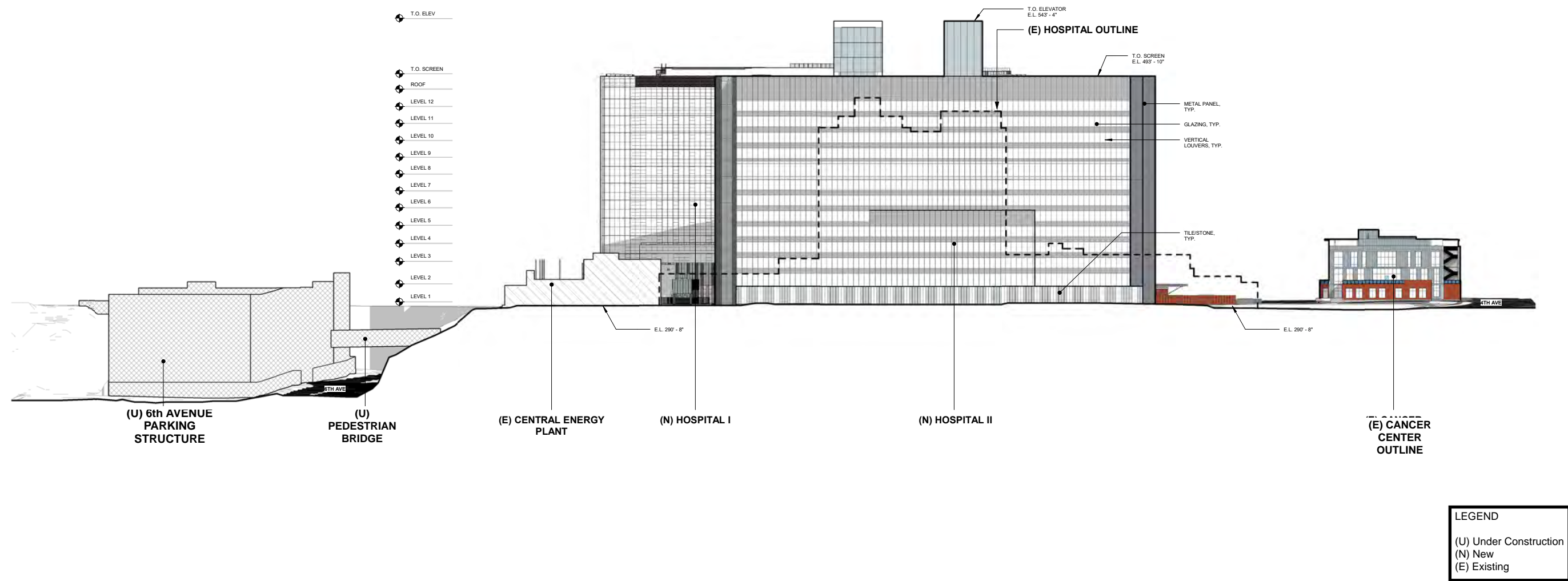


Figure 3-3d. Site Elevations -North

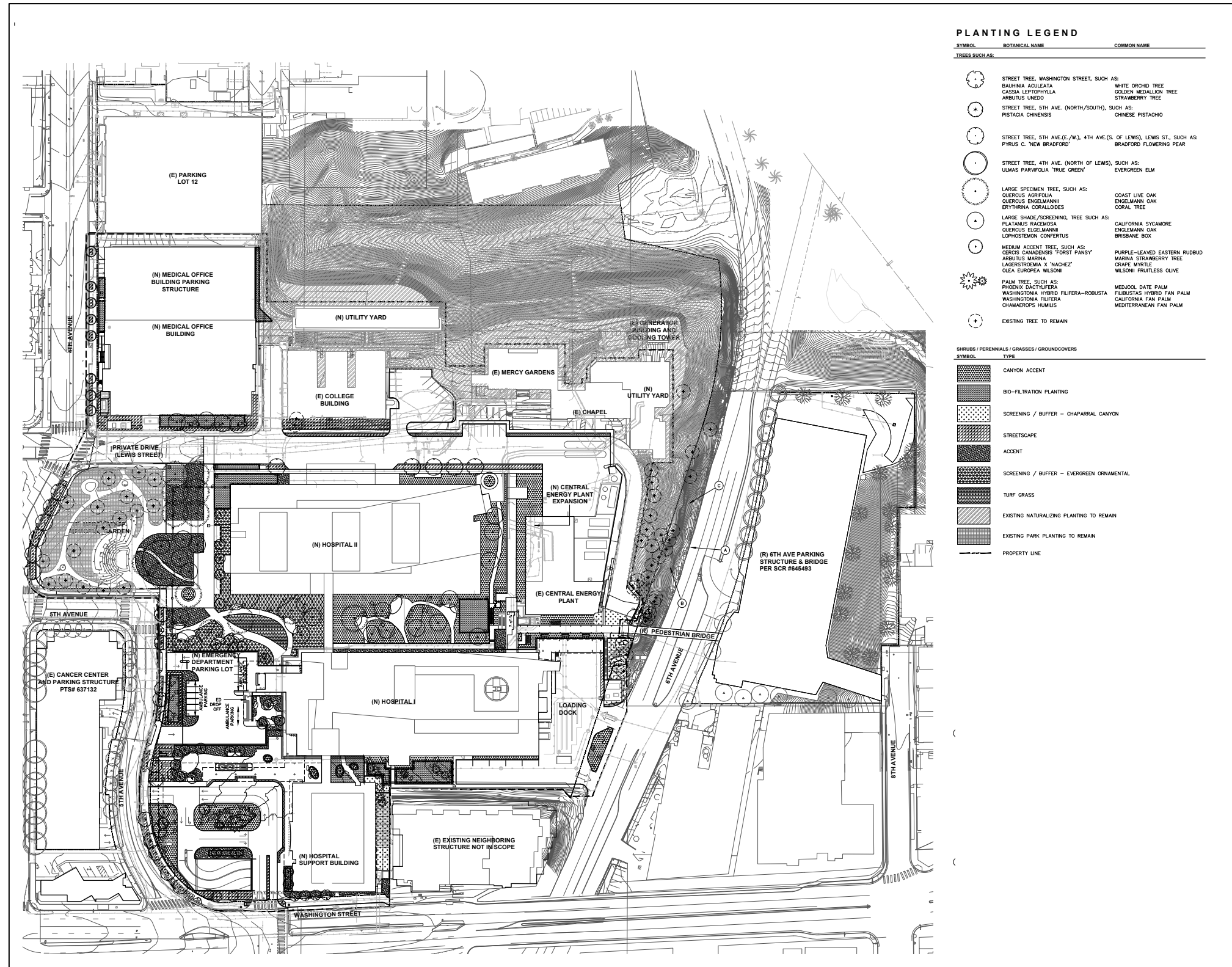


Figure 3-4. Scripps Mercy Hospital Campus Planting Plan

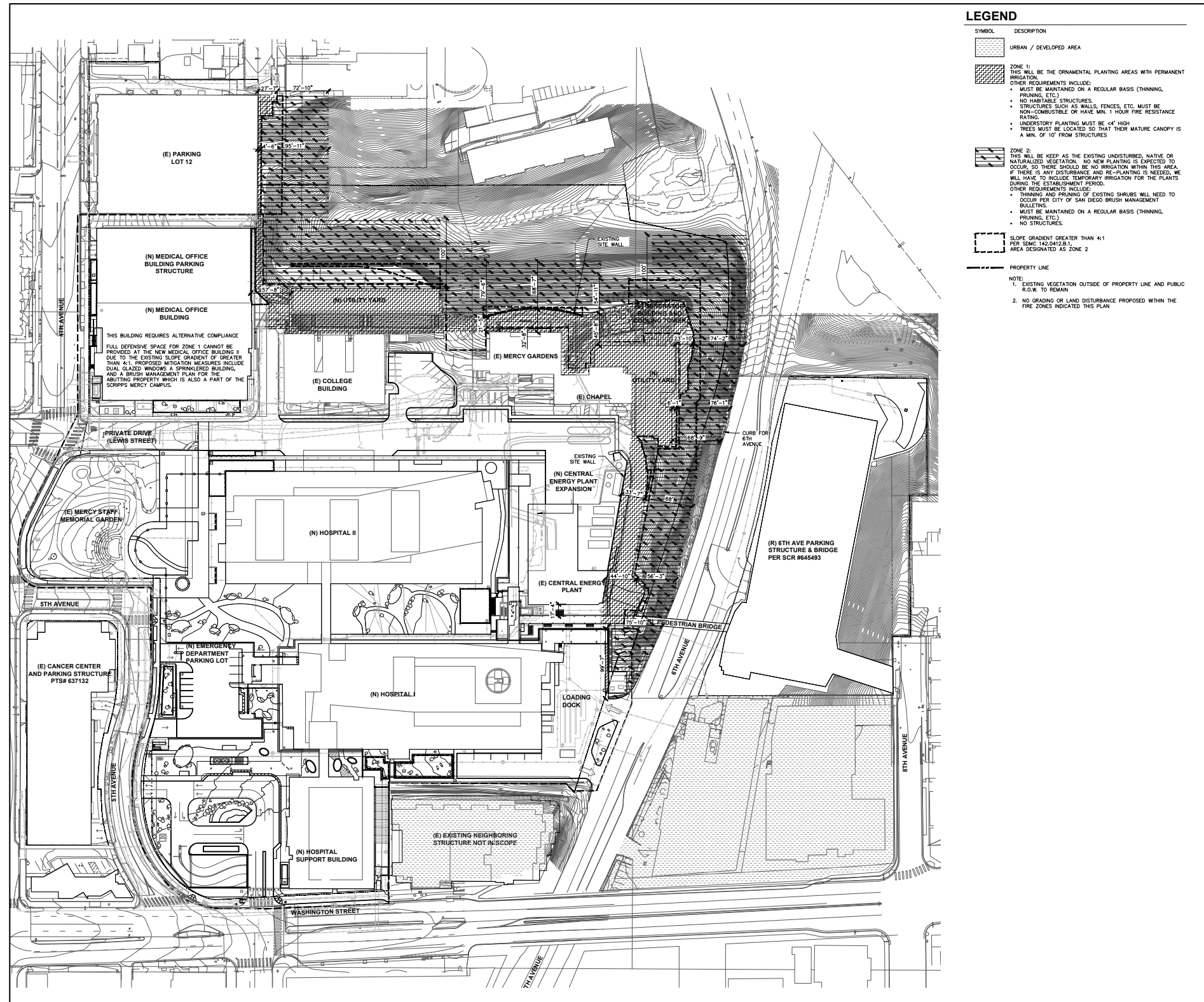


Figure 3-5. Brush Management Plan

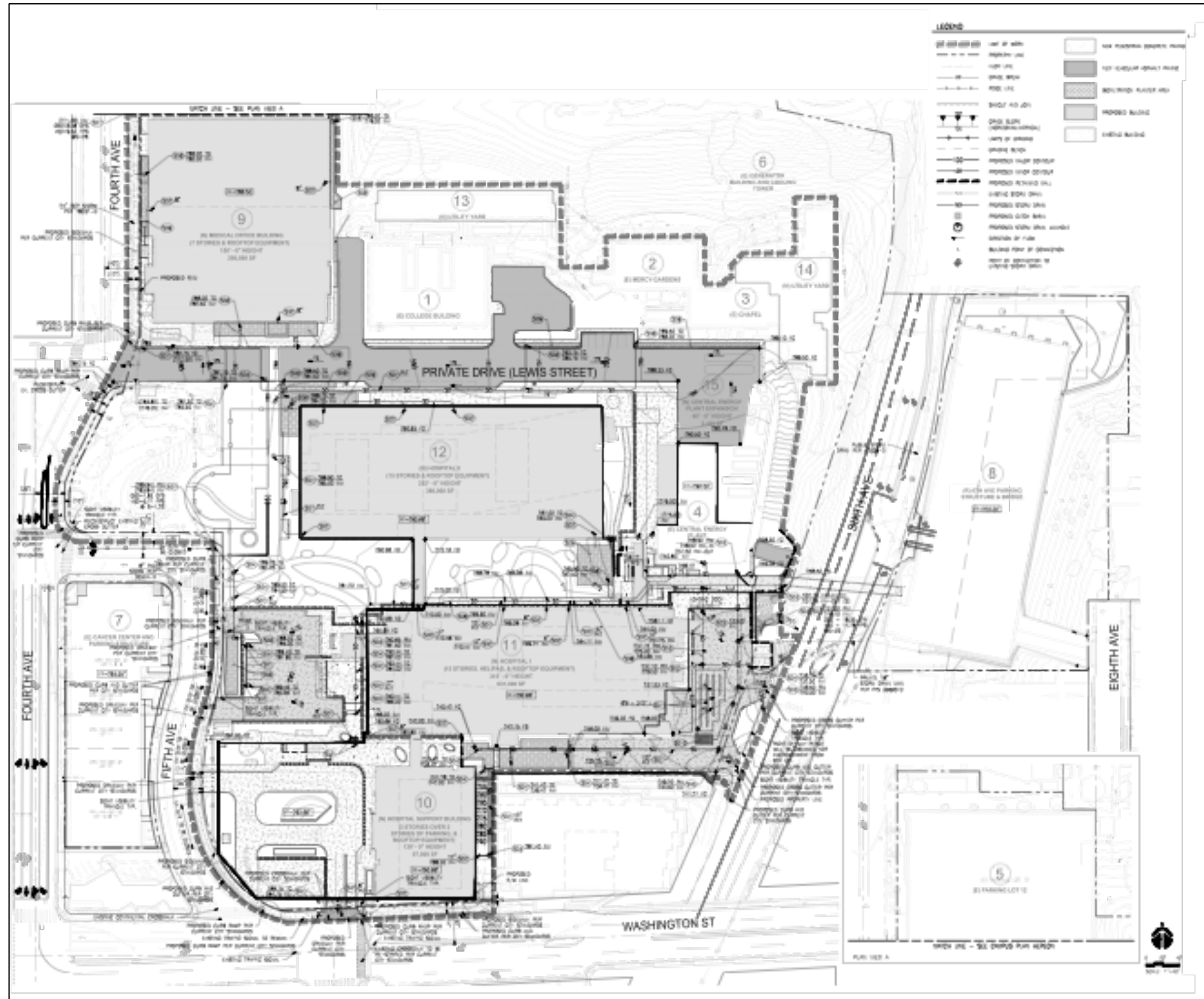


Figure 3-6. Scripps Mercy Hospital Campus Grading Plan

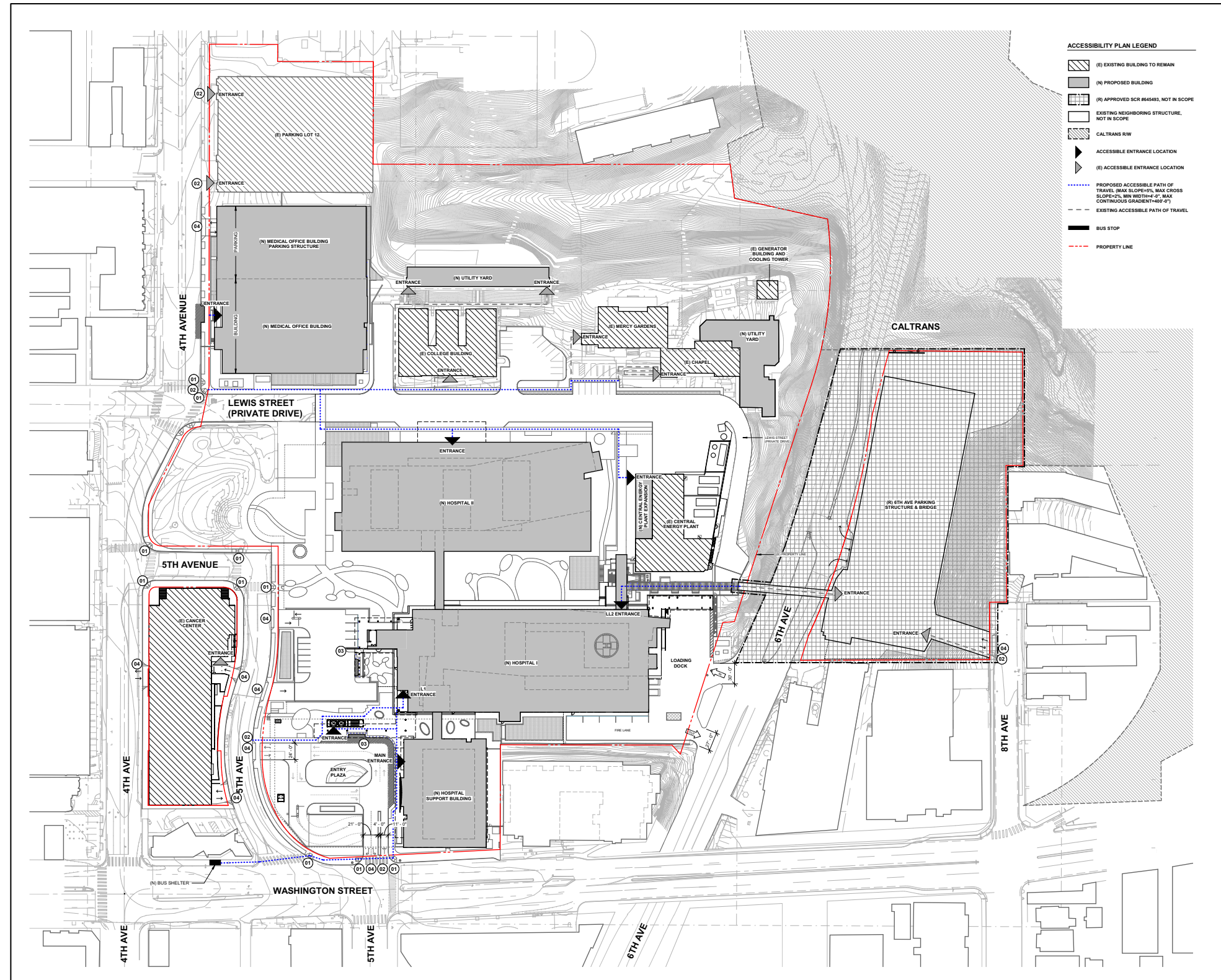


Figure 3.7 Scripps Mercy Hospital Campus Accessibility Plan

4.0 HISTORY OF PROJECT CHANGES

This section chronicles the physical changes that have been made to the project in response to revisions requested by City staff, as well as through the project review and refinement process. These changes are described below.

The original project submittal proposed construction of two new medical office buildings: MOB I, which was proposed to be constructed where the Mercy Staff Memorial Garden is located, west of the existing Scripps Mercy Hospital, east of Fourth Avenue, and south of Lewis Street; and MOB II, proposed immediately north of MOB I. In re-evaluating the future needs and long-term goals of the hospital campus by the applicant, it was determined that MOB I would not be required and that the size of MOB II could be reduced from previously proposed 300,000 sf to 200,000 sf. Reduction in the size of the medical office building also resulted in a reduction in the proposed building height, from previously proposed 175 feet to 150 feet and a reduction in the number of vehicular parking at this site from 1,050 spaces to 350 spaces. Plans and technical studies associated with the original submittal were modified to reflect the elimination of one medical office building and reduction in size of the remaining medical office building. The project evaluated in this EIR includes construction of only one medical office building.

Additionally, the original project submittal included a request to purchase public right-of-way at the Sixth Avenue entrance to the hospital campus and to be used for a storm water control facility. That request was removed from the project proposal, and the storm water control facility is proposed as a modular wetland within the limits of the Scripps Mercy Hospital property.

5.0 ENVIRONMENTAL ANALYSIS

The following sections analyze the potential environmental impacts that may occur as a result of project implementation. Issue areas subject to detailed analysis include those that were identified by the City of San Diego as potentially causing significant environmental impacts through the initial study and scoping process and issues which were identified in response to the NOP and the public scoping meeting as having potentially significant impacts. The NOP and letters submitted in response to the NOP are included in Appendix A. The following environmental issues are addressed in this Section:

- Land Use
- Transportation and Circulation
- Visual Effects and Neighborhood Character
- Air Quality
- Historical Resources
- Noise
- Greenhouse Gas Emissions
- Public Services and Facilities
- Public Utilities

5.1 Land Use

The following section discusses land uses and policies that are applicable to the project. It references planning and environmental information contained in other sections of this EIR, as applicable.

5.1.1 Existing Conditions

The approximately 21.07-acre project site has been previously developed with the Scripps Mercy Hospital campus. As described in Chapter 3.0, *Project Description*, partial redevelopment of the campus would occur with the project. Currently, the hospital campus provides institutional land uses, which include the hospital building, medical office buildings, support uses (such as the chapel and central energy plant), and parking and circulation elements.

The project site is located in the central portion of the northern area of the Uptown community of the City of San Diego. The site is within the community's Medical Complex neighborhood and has been developed consistent with Community Plan land use designations as the Scripps Mercy Hospital Campus.

Land uses adjacent to the project site include multi-family residential with some single-family structures to the north; medical office, multi-family residential, parking, and commercial to the west; and commercial and medical office to the south. Multi-family residential, medical offices, and the Sixth Avenue/SR 163 off-ramp are located to the east of the project site. Nearby land uses include the University of California San Diego (UCSD) medical campus, located in the northwest portion of the Medical Complex neighborhood and northwest of the project site, and the commercial core of Hillcrest, located south of the project site.

5.1.1.1 Regulatory Framework

Land use and other plans and regulations applicable to the project are: the City's General Plan, CAP, Uptown Community Plan, and Land Development Code (LDC) regulations, as well as plans of other agencies such as the San Diego International Airport ALUCP, the San Diego Air Pollution Control District (SDAPCD), and the RWQCB. In addition, the regional planning context is provided in San Diego Forward: The Regional Plan, prepared by SANDAG. The project also is subject to compliance with all other applicable local, State, and Federal regulations. The policies of the plans, ordinances, and regulations relevant to the project are described below.

Federal

Federal Aviation Administration Noticing Requirements

The FAA, under Code of Federal Regulations (CFR) Title 14, Part 77, Safe, Efficient Use and Preservation of the Navigable Airspace, requires submittal of a Notice of Construction or Alteration for applicable projects within identified airport Noticing Surface Areas. Specific requirements for such notices include structures more than 200 feet above the ground surface, construction or alteration that extends within identified (theoretical) slopes projecting from airport runways (or other applicable locations), all airport projects, and certain other transportation projects. After submittal of the required notice, the FAA conducts an aeronautical review prepared under the provisions of 49 US Code Section 44718 and, if applicable, Title 14 of CFR, Part 77. Objects determined to be an obstruction or hazard by Part 77 or Terminal Instruction Procedures, or create change to flight operations, approach minimums, or departure routes would be considered incompatible. Proposed developments may be incompatible and would require evaluation if they would generate other obstructions, such as release of any substance that would impair visibility (e.g., dust, smoke, or steam); emit or reflect light that could interfere with air crew vision; produce emissions that would interfere with aircraft communication systems, navigation systems or other electrical systems; or attract birds or waterfowl. Upon completion of the aeronautical review, the FAA issues either a Determination of Hazard to Navigation (i.e., if a project would exceed an obstruction standard and result in a “substantial aeronautical impact”) or a Determination of No Hazard to Navigation. In the latter case, the FAA may include site-specific conditions or limitations to ensure that potential hazards are avoided (e.g., noticing requirements or lighting restrictions).

SDIA contains the closest airport runway to the project site, approximately 1.5 miles southwest of the project site. The project site is located within the FAA Noticing Area for SDIA.

Local

San Diego Forward: The Regional Plan

SANDAG’s San Diego Forward: The Regional Plan (Regional Plan) (2021) is a regional transportation and sustainability plan that aims to provide a blueprint for a more livable, equitable, and innovative future. It combines and updates two previous plans, the Regional Comprehensive Plan and the Regional Transportation Plan/Sustainable Communities Strategy, into one document that looks toward 2050. The Regional Plan covers a broad range of topics including air quality, borders and tribal nations, climate change, economic prosperity, emerging technologies, energy and fuels, habitat preservation, healthy communities, public facilities, shoreline preservation, transportation, and water quality.

The Regional Plan emphasizes the importance of choice of transportation in the future, such as biking, skateboarding, walking, riding a wheeled device, trolley, sprinter, COASTER, bus, or driving. It places special emphasis on active transportation, such as walking and biking, and reducing car use in order to minimize GHG emissions, diminish air pollution, and maximize public health. The

Regional Plan also includes a Sustainable Communities Strategy, which identifies five main strategies to complement the goal of sustainability. The strategies are to focus on job growth and housing in urbanized areas with existing public transportation options, preserve open space, invest in a transit network that caters to everyone and includes many options, reduce GHG emissions, address housing needs for all economic segments of the population, and to implement the Regional Plan through incentives and collaboration.

Every four years, SANDAG prepares and updates a Regional Plan in collaboration with the 18 cities and County of San Diego along with regional, state, and federal partners. SANDAG has recently prepared San Diego Forward: The 2021 Regional Plan (2021 Regional Plan). This plan will guide the region through 2050 and is being developed through a new data-driven process to transform the way people and good move. The goals of this transformation are to provide people with more travel choices, protect the environment, create healthy communities, and stimulate economic growth for the benefit of all San Diegans.

San Diego International Airport Airport Land Use Compatibility Plan

The ALUC is an agency that is required by state law to exist in counties in which there is a commercial and/or a general aviation airport. The purpose of the ALUC is to protect public health, safety, and welfare by ensuring the orderly development of airports and the adoption of land use measures that minimize the public's exposure to excessive noise and safety hazards within areas around public airports, to the extent that these areas are not already devoted to incompatible uses. The San Diego County Regional Airport Authority (SDCRAA) serves as the ALUC for SDIA, the public aviation facility nearest the project site. The SDIA runway is approximately 1.5 miles southwest of the project site. The ALUC is responsible for preparation of ALUCPs for each airport in the region. With limited exception, California law requires preparation of a compatibility plan for each public use and military airport in the state.

In addition to establishing land use compatibility policies, the ALUCPs establish development criteria for new development within the AIAs to protect the airports from incompatible land uses and provide the affected jurisdictions with development criteria to support orderly growth surrounding the airports. The policies and criteria contained in the ALUCPs are addressed in the General Plan (Land Use and Community Planning Element and Noise Element) and implemented by the supplemental development regulations in the Airport Land Use Compatibility Overlay Zone (ALUCOZ) within Chapter 13 of the SDMC.

The SDIA ALUCP is the fundamental tool used by the SDCRAA to promote land use compatibility between the SDIA and the surrounding land uses in the airport vicinity. The SDIA ALUCP is intended to (1) provide for the orderly growth of the airport and area surrounding the airport; and (2) safeguard the general welfare of the inhabitants within the vicinity of the airport and the public in general. The ALUCP contains compatibility criteria, maps, and other policies to carry out these objectives.

The project site is within the AIA for SDIA, as shown on Figure 2-9, *San Diego International Airport ALUCP Airport Influence Area*. The AIA is defined as the area in which current or future airport-related noise, overflight, safety, or airspace protection factors may significantly affect land uses or necessitate restrictions on those uses as determined by an airport land use commission. The AIA for SDIA serves as the planning boundary for the ALUCP for that airfield facility and is divided into two review areas. Review Area 1 comprises the noise contours, safety zones, airspace protection surfaces, and overflight areas; and Review Area 2 comprises the airspace protection surfaces and overflight areas.

The project site is within Review Area 2 for SDIA. Limits on the heights of structures, particularly in areas of high terrain, are the only restrictions on land uses within Review Area 2. Within Review Area 2, only land use actions for which the height of objects is an issue are subject to ALUC review.

As described above in *Federal Regulations* of this section, the project site is located within the FAA Part 77 Noticing Area for SDIA. Building height and obstruction restrictions apply around the installation to ensure that no object would interfere with the safe operation of aircraft or impact the air installation operations. The ALUCP contains criteria for determining airspace obstruction compatibility. Any proposed development that includes an object over 200 feet above the ground level or that penetrates the 100:1 slope extending 20,000 feet away from the nearest runway must be submitted to FAA for obstruction evaluation, as well as notifying SDCRAA and SDIA.

Regional Air Quality Strategy

The SDAPCD and SANDAG are responsible for developing and implementing the clean air plan for attainment and maintenance of the ambient air quality standards in the SDAB. The RAQS was updated most recently in 2016. The RAQS outlines SDAPCD's plans and control measures designed to attain the state air quality standards for ozone. The SDAPCD has also developed the air basin's input to the State Implementation Plan (SIP), which is required under the Federal Clean Air Act (CAA) for areas that are out of attainment of air quality standards. The SIP, approved by the United State Environmental Protection Agency (EPA) in 1996, includes the SDAPCD's plans and control measures for attaining the ozone national standard.

The RAQS relies on information from California Air Resources Board (CARB) and SANDAG, including mobile and area source emissions, as well as information regarding projected growth in the County, to project future emissions and then determine from that the strategies necessary for the reduction of emissions through regulatory controls. The SIP relies on the same information from SANDAG to develop emission inventories and emission reduction strategies that are included in the attainment demonstration for the air basin. The SIP also includes rules and regulations that have been adopted by the SDAPCD to control emissions from stationary sources. These SIP-approved rules may be used as a guideline to determine whether a project's emissions would have the potential to conflict with the SIP and thereby hinder attainment of the national air quality standard for ozone. (Project impacts relative to implementing the RAQS are discussed in Section 5.4, *Air Quality*.)

Water Quality Control Plan for the San Diego Basin

The RWQCB adopted the San Diego Basin Plan in 1994 (updated in 2016) that recognizes and reflects regional differences in existing water quality, the beneficial uses of the region's ground and surface waters, and local water quality conditions and problems. The Basin Plan is designed to preserve and enhance water quality and protect the beneficial uses of all regional waters. (Project impacts relative to the RWQCB and San Diego Basin Plan are discussed in Chapter 7.0 Section 7.12, *Water Quality*.)

City of San Diego General Plan

The City's General Plan is a comprehensive, long-range vision document that sets forth the policy framework for how the City should plan for projected growth and development. The City's General Plan emphasizes the need for maintaining the character of its communities, preserving its natural resources and amenities, and providing adequate public services. It emphasizes implementation of the City of Villages Strategy, which focuses on growing mixed-use activity centers that are pedestrian-friendly, centers of community that are multi-modal, and linked to the regional transit system. The strategy draws upon the character and strengths of the City's natural environment, neighborhoods, commercial centers, institutions, and employment centers. The strategy is designed to sustain the long-term economic, environmental, and social health of the City and its many communities. It recognizes the value of the City's distinctive neighborhoods and open spaces that together form the City as a whole. The General Plan comprises a Strategic Framework section and the following ten elements, each with its own Citywide policies: Land Use and Community Planning; Mobility; Urban Design; Economic Prosperity; Public Facilities, Services and Safety; Recreation; Conservation; Historic Preservation; Noise; and Housing. These elements are summarized below.

- **Land Use and Community Planning Element (Updated 06/29/2015)** – The Land Use and Community Planning Element (Land Use Element) of the General Plan guides future growth and development into a sustainable citywide development pattern, while maintaining or enhancing the quality of life. This element provides policies to implement the City of Villages strategy and establishes a framework to guide and govern the preparation of community plans tailored to each community.

One major component of the Land Use Element that guides not only land use goals and policies, but also provides the overall vision for the General Plan is the *City of Villages Strategy*. The City of Villages strategy focuses growth into mixed-use activity centers that are pedestrian-friendly, centers of community, and linked to the regional transit system. The strategy draws upon the strengths of San Diego's natural environment, neighborhoods, commercial centers, institutions, and employment centers and focuses on the long-term economic, environmental, and social health of the City and its many communities. The City of Villages Strategy recognizes the value of San Diego's distinctive neighborhoods and open spaces that together form the City as a whole. Implementation of the City of Villages strategy is an important component of the City's strategy to reduce local contributions to greenhouse gas emissions, because the strategy makes it possible for larger numbers of people to make fewer and shorter auto trips.

- **Mobility Element (Updated 06/29/2015)** – The Mobility Element of the General Plan provides the framework to improve mobility through development of a balanced, multi-modal transportation network that is efficient and minimizes environmental and neighborhood impacts. It is closely linked to the Land Use and Community Planning Element and the City of Villages strategy. Project-relevant policies contained within the Mobility Element address the need to improve walkability and the bicycle network, increase transit use, improve performance and efficiency of the street and freeway system, and provide sufficient parking facilities.
- **Urban Design Element (03/10/2008)** – The General Plan’s Urban Design Element addresses the integration of new development into the natural landscape and/or existing community. The element discusses an Urban Design Strategy, or framework, for development as envisioned in the City of Villages strategy.
- **Economic Prosperity Element (Updated 06/29/2015)** – The Economic Prosperity Element of the General Plan links economic prosperity goals with land use distribution and employment land use policies. Its purpose is to increase wealth and the standard of living of all San Diegans with policies that support a diverse, innovative, competitive, entrepreneurial, and sustainable local economy. This element primarily deals with various industrial, commercial and other employment uses within the City.
- **Public Facilities, Service, and Safety Element (Updated 12/14/2021)** – The General Plan’s Public Facilities, Services and Safety Element addresses facilities and services that are publicly managed, and have a direct influence on the location of land uses.
- **Recreation Element (Updated 08/03/2021)** – The General Plan’s Recreation Element addresses the preservation, protection, acquisition, development, operation, maintenance, and enhancement of public recreation opportunities and facilities throughout the City for all users.
- **Conservation Element (03/10/2008)** – The Conservation Element of the General Plan contains policies to guide the conservation of resources that are fundamental components of San Diego’s environment, that help define the City’s identity, and that are relied upon for continued economic prosperity. Sustainable development and climate change issues are also addressed through the Conservation Element.
- **Noise Element (Updated 06/29/2015)** – The Noise Element of the General Plan is intended to protect people living and working in the City of San Diego from excessive noise. The most prevalent noise source in the City is motor vehicle traffic. Goals and policies provided in the Noise Element guide compatible land uses and the incorporation of noise attenuation measures for new uses to protect people from an excessive noise environment. Specific goals and policies of the Noise Element applicable to the project include noise and land use

compatibility, motor vehicle traffic noise, trolley and train noise, commercial and mixed-use activity noise, construction and public activity noise, and noise attenuating measures are provided to guide development.

- **Historic Preservation Element (03/10/2008)** – The Historic Preservation Element guides the preservation, protection, restoration, and rehabilitation of historical and cultural resources. This element seeks to improve the quality of the built environment, encourage appreciation of the City's history and culture, maintain the character and identity of communities, and contribute to the City's economic vitality through historic preservation.
- **Housing Element (Updated (06/16/2020))** – The General Plan's Housing Element is the City of San Diego's housing plan. The City, along with all California cities and counties, is required to adequately plan to meet the housing needs of everyone in the community, and to update it plan every eight years.

As shown in Figure 2-5 *City of San Diego General Plan Land Use and Street System Map*, the developed portion of the Scripps Mercy Hospital campus is located in the Multiple Use and Institutional & Public and Semi-Public Facilities land use designated areas; vegetated slopes void of development within the project site are located in the Park, Open Space, & Recreation land use designated area. The General Plan's elements each contain a variety of goals and policies that address numerous environmental issues. The relevant goals and policies of the General Plan to the project are included in Table 5.2-1, *City of San Diego General Plan Consistency*.

City of San Diego Climate Action Plan

The City adopted its CAP in December 2015 to outline the actions to be taken by the City to achieve its proportional share of State Greenhouse Gas (GHG) emission reductions, consistent with CARB requirements associated with Executive Order (EO) S-3-05, AB 32, EO B-30-15, SB 32, AB 197, AB 1493, EO S-01-07, SB 375, and related laws and regulations discussed in Section 5.7, *Greenhouse Gas Emissions*, of this EIR. The CAP serves four primary purposes: (1) providing a roadmap for the City to achieve GHG reductions; (2) conforming the City's climate change efforts to California laws and regulations; (3) implementing climate change actions from the General Plan; and (4) providing for CEQA tiering to address the GHG emissions of new development. The CAP identifies five strategic areas to focus its GHG reduction targets: energy and water efficient buildings; clean and renewable energy; bicycling, walking, transit, and land use; zero waste; and climate resiliency.

The CAP serves as mitigation for the CEQA GHG/climate change impacts of the City's General Plan identified in the General Plan EIR. The CAP supports implementation of the General Plan by supporting changes to the urban land use form, providing greater transportation choices, and transforming how energy is used and produced. The General Plan calls for the City to reduce its carbon footprint through actions including adopting new or amended regulations, programs, and incentives. General Plan Policy CE-A.13 specifically identifies the need for an update of the City's 2005 Climate Protection Action Plan that identifies actions and programs to reduce GHG emissions

of the community-at-large, and City operations. Additionally, the CAP serves as a “Qualified GHG Reduction Plan” for purposes of tiering under CEQA. The CAP quantifies baseline GHG emissions for 2010; provides emissions forecasts for 2020 and 2035; establishes reduction targets for 2020 and 2035; identifies strategies and measures to reduce GHG levels; and provides guidance for monitoring progress on an annual basis. Implementation of the CAP relies on compliance with various policies within the General Plan and consistency with the underlying land use assumptions in the CAP.

In 2016, the City adopted a CAP Consistency Checklist to be contained within, and used in conjunction with, the CAP. The purpose of the checklist is to provide a streamlined review process for proposed new development projects that are subject to discretionary review and trigger environmental review pursuant to the CEQA.

The CAP Consistency Checklist contains measures to be implemented on a project-by-project basis to ensure that the CAP-specified emissions targets are achieved, thus simplifying project-level analysis within a CEQA document. Implementation of the identified measures would ensure that new development is consistent with the relevant CAP strategies meant to achieve identified GHG reduction targets. Projects that are consistent with the CAP as determined through the use of the CAP Consistency Checklist may rely on the CAP to analyze the cumulative impacts associated with the project’s GHG emissions. Conversely, projects that are found to be not consistent with the CAP must prepare a comprehensive project-specific analysis of GHG emissions, including quantification of existing and projected GHG emissions and incorporation of the measures in the CAP Consistency Checklist to the extent feasible. Finally, any project that is not consistent with the CAP would result in cumulatively significant GHG impacts. (Project impacts relative to the CAP are discussed in Section 5.7, *Greenhouse Gas Emissions*.)

Uptown Community Plan

The Uptown Community Plan was adopted by the City Council on November 14, 2016, as an update to the 1988 Uptown Community Plan, and incorporates one amendment since its adoption. The Uptown planning area comprises approximately 2,700 acres and contains some of the oldest and most distinct neighborhoods in San Diego consisting of Hillcrest, Mission Hills, Bankers Hill/Park West, University Heights, Middletown, and the Medical Complex. Uptown is located just north of Downtown. It is bounded on the north by the steep hillsides of Mission Valley, on the east by Park Boulevard and Balboa Park, and on the west and south by Old Town San Diego and I-5.

The Uptown Community Plan identifies the following 16 guiding principles to provide the general framework for development of the community:

- Maintain distinctive neighborhoods by preserving the qualities and resources that make Uptown unique.
- Encourage development diversity by maintaining the demographic, architectural, and economic diversity that have contributed to Uptown’s vitality and aesthetic vibrancy.

- Preserve Uptown’s historic fabric by preserving important resources, adaptively reusing older buildings, and sensitively responding to the scale and character of historic buildings.
- Recognize the environmental, visual, and recreational value of Uptown’s natural canyon landscape.
- Create a complete, well-served community, ensure that existing levels of service are not diminished, and existing deficiencies are not exacerbated.
- Ensure vibrant business and commercial district by creating a physical environment that supports retail and entertainment activities and encourages multi-modal access.
- Provide convenient access to parks and community open spaces through the addition of new park lands, including small pocket parks and spaces for community gardens and better trail connections to canyons and other open space.
- Create walkable neighborhoods and complete streets that accommodate bicyclists and pedestrians safely, and reduce vehicular travel speeds.
- Re-establish transit as an attractive and viable transportation alternative to the automobile.
- Create a balance between integrating parking into the urban fabric to support commercial areas and access for non-motorized forms of transportation.
- Design for sustainability in buildings and in the environment.
- Provide a balanced transportation network that accommodates all modes of transportation, links Uptown to the region, and efficiency manages parking.
- Develop an urban form that respects neighborhood context through appropriate scale and transitions between existing and infill development and promotes sustainability.
- Include a high level of community facilities and services that not only meets the needs of the community, but are equally distributed and accessible throughout the neighborhood in Uptown.
- Support an open space network that links local neighborhoods to the region and allows for non-traditional opportunities for recreation.
- Respect and preserve cultural and heritage resources through historic designations and adaptive reuse within the community.

To implement the guiding principles the Community Plan includes: Land Use; Mobility; Urban Design; Economic Prosperity; Public Facilities, Services, and Safety; Recreation; Conservation; Noise; Historic Preservation; and Implementation. Development of the community is nearly complete, with only a limited number of vacant sites still available for development.

As shown in Figure 2-6, *Uptown Community Plan Land Use Map*, the developed portion of the hospital campus is located in the Institutional and Community Commercial: 0-109 Du/Ac land use designated areas; vegetated slopes void of development within the project site are located in the Open Space land use designated area. Table 5.2-2, *Uptown Community Plan Consistency*, includes the goals and policies relevant to the project.

Community Plan Implementation Overlay Zone

The Uptown Community Plan includes a CPIOZ Type A to regulate building heights. The CPIOZ is applied within the boundaries of the Uptown Community Plan per Chapter 13, Article 2, Division 14 of the Municipal Code to regulate specific building heights, as discussed in Section 2.4.3, *Zoning*, and illustrated in Figure 2-9, *Uptown Community Plan CPIOZ Type A - Building Heights*. Proposed development projects that exceed the height limitations set forth in the Type A requirements may be approved to the maximum allowed height of the applicable base zone, or the maximum allowed floor area of the base zone for zones without a maximum height limit with a SDP per Chapter 13, Article 2, Division 14 of the Municipal Code, if the project complies with the applicable regulations of the Municipal Code and are consistent with the applicable policies in the General Plan and Uptown Community Plan. As shown in Figure 2-9, *Uptown Community Plan CPIOZ Type A - Building Heights*, the project site is located within the CPIOZ Type A boundary that limits building heights to 65 feet.

San Diego Municipal Code

The SDMC contains many of the City's ordinances. Chapters 11, 12, 13, and 14 of the City of San Diego Municipal Code are known collectively, and may be referred to, as the LDC. The LDC sets forth the procedures used in the application of land use regulations, the types of review of development, and the regulations that apply to the use and development of land in the City of San Diego. The intent of these procedures and regulations is to facilitate fair and effective decision-making and to encourage public participation.

Zoning

The underlying base zones for the project site are Commercial—Community (CC-3-8 and CC-3-9) located over the majority of the project site; Residential—Multiple Unit (RM-3-9), located on the project boundary in the northern portion of the site; Open Space—Residential (OR-1-1), located in the northeast portion of the site); and Open Space - Conservation (OC-1-1), located in the northern portion of the site. (See Figure 2-8, *Existing Zoning*.)

The purpose of the CC zones is to accommodate community-serving commercial services, retail uses, and limited industrial uses of moderate intensity and small to medium scale. The CC zones are intended to provide for a range of development patterns from pedestrian-friendly commercial streets to shopping centers and auto-oriented strip commercial streets; some of the CC zones include residential development. Property within the CC zones is primarily located along collector streets, major streets, and public transportation lines. Specifically, the CC-3-8 and CC-3-9 zones allow a mix of high intensity, pedestrian orientation of community-serving commercial uses and residential uses. The CC-3-8 and CC-3-9 zones make up the vast majority of the development area of the project site.

The purpose of the RM zones is to provide for multiple dwelling unit development at varying densities. The RM zones individually accommodate developments with similar densities and characteristics. Each of the RM zones is intended to establish development criteria that consolidates common development regulations, accommodates specific dwelling types, and responds to

locational issues regarding adjacent land uses. A sliver of RM-3-9 zone occurs at the northern boundary of the project site.

The purpose of the City's Open Space zones is to protect lands for outdoor recreation, education, and scenic and visual enjoyment; to control urban form and design; and to facilitate the preservation of environmentally sensitive lands. The purpose of the OC zone is to protect natural and cultural resources and environmentally sensitive lands. It is intended that the uses permitted in this zone be limited to aid in the preservation of the natural character of the land, thereby implementing land use plans. The purpose of the OR zones is to preserve privately owned property that is designated as open space in a land use plan for such purposes as preservation of public health and safety, visual quality, sensitive biological resources, steep hillsides, and control of urban form, while retaining private development potential. These zones are also intended to help implement the habitat preservation goals of the City and the MHPA by applying development restrictions to lands wholly or partially within the boundaries of the MHPA. Development in these zones will be limited to help preserve the natural resource values and open space character of the land. The OC-1-1 and OR-1-1 zone encompass the hillsides of the project site that are outside the development area.

5.1.2 Impact Analysis

5.1.2.1 Issue 1, Issue 2, and Issue 3

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

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

Issue 3: Would the project result in the exposure of people to noise levels, which exceed the City's adopted noise ordinance or are incompatible with the Noise Compatibility Guidelines (Table ne-3) in the Noise Element of the General Plan?

Impact Threshold

According to the City of San Diego's CEQA Significance Determination Thresholds (City's Thresholds), an inconsistency with a plan is not by itself a significant impact; the inconsistency would have to relate to an environmental issue (i.e., cause a direct or indirect physical and adverse change in the environment) to be considered significant under CEQA. Land use policy impacts may be significant if a project would be:

- Inconsistent or conflict with an adopted land use designation or intensity and result in indirect or secondary environmental impacts;

- Inconsistent or conflict with the environmental goals and/or objectives of a community or general plan;
- Substantially incompatible with an adopted plan; or
- Cause the development or conversion of general plan or community plan designated open space or prime farmland to a more intensive use.

A significant land use impact relative to noise would occur if the project would expose new development to noise levels at exterior use areas or interior areas in excess of the noise compatibility guidelines established in the City General Plan Noise Element (see Table 5.1-4, *City of San Diego Noise Compatibility Guidelines*). Exterior noise levels of 60 community noise equivalent level (CNEL) are considered compatible with the project's hospital land uses, and exterior noise levels of 65 CNEL are considered compatible with the project's medical office land use. Hospital land uses are conditionally compatible with noise levels up to 65 CNEL when building structure attenuates the exterior noise to an interior noise level of 45 CNEL. Medical office land use is conditionally compatible with noise levels up to 75 CNEL when building structure attenuates the exterior noise to an interior noise level of 50 CNEL.

In addition, a significant land use impact associated with noise would occur from operation of a project [such as heating, ventilation, and air conditioning (HVAC) units] if it would result in the generation of noise levels at a common property line that exceed the SDMC limits (refer to Table 5.6-3 in Section 5.6, *Noise*, of this EIR). For instance, for multi-family residential uses, noise levels at a common property line may not exceed 55 CNEL during the day, 50 CNEL in the evening, or 45 CNEL at night.

In the short term, a significant land use impact associated with noise would occur from construction of a project if it would result in temporary construction noise that exceeds 75 A-weighted decibel (dBA) equivalent continuous sound level (L_{eq}) (12 hour) at the property line of a residentially zoned property from 7:00 a.m. to 7:00 p.m. (as identified in SDMC Section 59.0404) or if non-emergency construction occurs during the 12-hour period from 7:00 p.m. to 7:00 a.m. Monday through Saturday.

Analysis

This section addresses designated land uses and adopted plans with goals, objectives, and/or guidelines used to make land use decisions in the City with specific applicability to the project. For that reason, it addresses City land use planning documents, as well as relevant regional plans addressing focused environmental issues (e.g., regional transit planning, or regional air quality planning) that affect the project.

As described in Section 5.1.2.3, the project is subject to the City's General Plan and the Uptown Community Plan. Additionally, the project is subject to the LDC. The project is intended to implement over-arching General Plan policies in the project area through site-specific implementation of Citywide goals and policies, as additionally detailed in the Uptown Community. As

documented below, the project would be consistent with the noted planning documents. Additionally, proposed deviations from strict conformance with underlying zones would not result in substantial adverse impacts upon the environment.

General Plan Consistency

As has been previously described, the project site contains developed and undeveloped portions. The developed portion of the hospital campus is located in the Multiple Use and Institutional & Public and Semi-Public Facilities land use designated areas; vegetated slopes void of development within the project site are located in the Park, Open Space, & Recreation land use designated area. The project proposes no redevelopment in the Park, Open Space, & Recreation-designated portions of the site. Within the Multiple Use and Institutional & Public and Semi-Public Facilities-designated portions of the site, development would include hospital buildings, medical office buildings, and support buildings, which is consistent with the General Plan land use designations.

As demonstrated in Table 5.1-1, *City of San Diego General Plan Consistency*, the project would be consistent with the applicable goals and policies of the City of San Diego General Plan. Specifically, the project would be consistent with the Land Use and Community Planning Element in that the project's institutional (medical) land uses would contribute to the mixed-use nature of the adjacent Hillcrest neighborhood. The project would also improve pedestrian connectivity through the provision of contiguous and non-contiguous sidewalks with landscaping to include street trees and by providing bicycle improvements along Washington Street and Fifth Avenue.

The purpose of the Mobility Element is to improve mobility through development of a balanced, multi-modal transportation network. The project would increase safety and comfort for pedestrians by providing contiguous and non-contiguous sidewalks with landscaping that meet all code requirements to ensure accessibility to pedestrians of all abilities. The project's Local Mobility Assessment (LLG 2022) includes a Transportation Demand Management (TDM) Program. This includes such strategies as flexible or alternative work hours, transit improvements, provision of a carpool program with designated preferred carpool parking spaces and telecommuting as well as participation in SANDAG's iCommute Program. The TDM also includes a transit subsidy of 30 percent (which is approximately \$1.00 per day per employee for the current monthly pass of \$72.00) towards transit passes for MTS Bus, Trolley, or COASTER trains for employees to promote transit usage. Additionally, the project would allow transit passes to be purchased on a pre-tax basis through payroll deductions. The project site supports alternative transportation modes, emphasizes pedestrian accessibility, and provides bicycle facilities.

The Urban Design Element includes polices and goals relating to the existing City form and achieving a compact and environmentally sensitive pattern of development as envisioned in the City of Villages Strategy. The Scripps Mercy Hospital campus contributes to the distinctive character of the Medical Complex neighborhood of the Uptown community through redevelopment with statement architecture, enhanced landscaping, and gateway design components that would further contribute to the distinctive character of this neighborhood. Because redevelopment would occur within an

existing campus, new buildings would be related to those remaining on campus, as well as within the surroundings. Building entries would be prominent, visible, and in a location that provides logical and convenient access. Landscape materials and design would unify the campus landscape to provide a sense of cohesiveness and clarify and simplify wayfinding and improve overall visitor experience. The project would employ sustainable building methods consistent with Title 24, the City's CAP, and waste management requirements.

The purpose of the Public Facilities, Services and Safety Element is to provide the public facilities and services needed to serve the existing population and new growth. The project would be consistent with the Public Facilities, Services, and Safety Element by providing a major medical campus within the heart of San Diego within easy walking, bicycling, and transit distance for many residents, thereby contributing to the healthcare services to meet the needs of San Diego. The project is located adjacent to an existing bus stop and would provide a bus shelter.

The purpose of the Conservation Element is to provide for the long-term conservation and sustainable management of the rich natural resources that help define the City of San Diego. The project's purpose is to expand and modernize the hospital campus. The project would utilize recycled content where possible, would reduce its construction and demolition waste, and would adhere to all Citywide recycling regulations. The project would implement sustainable landscape design and maintenance including a centralized irrigation system and irrigation monitoring technology to provide water efficiency; use of native and naturalized drought tolerant plant palettes reflective of the surrounding canyon plant, use of light colored paving materials; use of bio-filtration retention basins that allow for storm water capture and treatment; use of trees and planting to provide shade and create cool micro-climates; and use of recycled materials for hardscape, landscape and site furnishing materials.

The Noise Element's purpose is to protect people living and working in the City of San Diego from excessive noise. Relative to the Noise Element, a noise study has been prepared that indicated noise from construction of the project could exceed the applicable limit of 75 dBA at Receiver 2 (the neighboring Warwick multi-family residential building) during certain phases of construction. Mitigation measure MM 5.6-1 presented in Section 5.6, *Noise*, would reduce significant construction noise impacts to below a level of significance.

Traffic is the primary source of noise that would be generated by the project. As shown in Table 5.6-12, *Projected Vehicular Traffic Noise Impacts*, the project would result in an increase from the current 73.7 CNEL to 77.0 CNEL due to the addition of project-related traffic to traffic volumes at residential locations along Fourth Avenue between Lewis Street and Arbor Drive. The increase is greater than 3-dBA allowed by the Noise Compatibility Guidelines for exterior noise, resulting in a significant direct and cumulative impact. There is no City procedure to ensure that exterior noise affecting existing noise sensitive land uses (NSLUs) is sufficiently attenuated to meet City standards and, therefore, no feasible mitigation measures to reduce traffic noise impacts to a less than significant

level. This impact would remain significant and unmitigated. (See Section 5.6, Noise, for a detailed discussion of noise impacts associated with the project.)

Planned changes to helicopter flight paths for the new campus would keep helicopters farther away from nearby NSLUs. The change would not increase CNELs attributable to helicopter noise at NSLUs impacted most by helicopters traveling to the project site (along Washington Street and across Mercy Canyon). This, therefore, does not present a significant noise impact to nearby NSLUs. The new flight paths and visits by larger helicopters (approximately once every twenty days) would not significantly change current CNELs; however, the individual noise event resulting from larger helicopter visits may result in Sound Exposure Level (SEL) increases of approximately two dBA compared to current helicopter visits. Given the minimal increase in CNEL, this would not present a significant impact.

Relative to building systems equipment (i.e., heating, ventilation, and air conditioning – HVAC), sound attenuation methods, such as acoustic louvers, ducted silencers, and barrier walls, are typically included in the design to ensure radiated noise does not exceed noise ordinance limits at the property lines. Thus, HVAC systems would not generate noise that would result in significant impacts.

Construction noise levels would exceed City ordinance construction threshold of 75 dBA Leq at the closest NSLUs, resulting in a significant noise impact associated with construction. Mitigation measures are required to reduce construction noise impacts to below a level of significance. Implementation of mitigation measure MM 5.6-1 presented in section 5.6, *Noise*, would be applied to all phases of the project site demolition and construction work and would reduce significant construction noise impacts to below a level of significance.

The purpose of the Historic Preservation Element is to guide the preservation, protection, restoration, and rehabilitation of historical and cultural resources and maintain a sense of the City. (See Section 5.5, *Historic Resources*, for a detailed discussion of historic resources.) , Mercy Chapel (HRB #397) is a San Diego historic resource and is located on the project site. The Mercy Chapel would be rehabilitated in accordance with the Secretary of the Interior's Standards for the Treatment of Historic Resources. Work to be completed would include removal of non-contributing buildings (i.e., the boiler and laundry building listed under 3.2.1.2 Demolition) and rehabilitation of the Mercy Chapel to its 1949 period of significance. No impacts to historic resources would occur as a result of the project.

As discussed above, the project would include features and strategies that are compatible with the Mobility, Urban Design, Public Facilities, Services and Safety, and Conservation Elements of the General Plan. However, the project would not be consistent with all policies of the Noise Element. The project would result in a significant and unmitigated impact from traffic noise. As such, impacts relative to consistency with the General Plan would be significant, with regard to noise.

Community Plan Consistency

As has been previously described, the project site contains developed and undeveloped portions. The developed portion of the hospital campus is located in the Institutional and Community Commercial: 0-109 Du/Ac land use designated areas; vegetated slopes void of development within the project site are located in the Open Space land use designated area. The project proposes no redevelopment in the Open Space-designated portions of the site. Within the Institutional- and Community Commercial-designated portions of the site, development would include hospital buildings, medical office buildings, and support buildings, which is consistent with the Community Plan land use designations as demonstrated in Table 5.1-2, *Uptown Community Plan Consistency*, the project would be consistent with the applicable goals and policies of the Uptown Community Plan.

The Uptown Community Plan provides a long-range guide for the future physical development of the community. The Land Use Element of the Uptown community Plan guides the future growth and development of Uptown through the distribution of land uses and the application of a range of land use designations. The project is consistent with the goals and policies of this element and would allow for continued operation of the Scripps Mercy Hospital, as well as the intensification of those existing hospital uses within the current campus footprint. Redevelopment on-site would be compatible in design with the surrounding neighborhood, including residential and open space areas.

The Mobility Element includes policies that encourage safe and efficient pedestrian and bicycle friendly facilities. The project includes enhanced pedestrian connections including new contiguous and non-contiguous sidewalks and plaza element to create a comfortable pedestrian experience. Short-term and long-term bicycle parking would be provided within the project, as well as showers and lockers to serve cyclists. The project would encourage the use of public transportation through signage and the addition of a bus stop shelter for the bus stop located along the project frontage on Washington Street. Electric vehicle charging stations would also be integrated into the project's parking that would be primarily structured parking integrated into new building development.

The Uptown Community Plan includes an Urban Design element to ensure that the physical attributes that make Uptown unique will be retained and enhanced by design that responds to the community's particular context, while acknowledging the potential for positive growth and change. The project supports the goals and policies of this element by including new buildings of appropriate scale that would be designed to provide transitions between older and new development on- and off-site. Streetscape site furnishings would be consistent in character including design, type, color, and material in accordance with the Uptown Community Plan. Currently, Scripps Mercy Hospital has landscaping and screening at the parkways and around the campus. This would be maintained and/or enhanced within the project to enrich the appearance of hospital facilities. Additional landscaping and planting by the project utilizes selections based on the criteria of the Uptown Community Plan and would ensure that trees would be planted in areas where sufficient root growth and drainage can be accomplished. The project also includes a series of plazas with seating elements to promote use by patients, visitors, and employees.

The Uptown Community contains a sizable amount of the City's employment, and the Community Plan includes an Economic Prosperity Element with goals and polices to guide the expansion of medical-related development and employment and promote growth of Uptown's health sector. The project allows for the Scripps Mercy Hospital campus to expand and modernize in a manner that continues to serve the community and provide medical-related employment within the Uptown Community. The project would allow for Scripps Mercy Hospital to continue and enhance its quality of care and supports employment growth in the medical sector.

The Conservation Element of the Uptown Community Plan includes goals and policies focused on the implementation of sustainable development, building techniques, sustainable site planning practices, and the preservation and expansion of the urban forest. The project would meet energy saving measures per Title 24 and CalGreen, as well as provide solar photovoltaic panels and electric vehicle charging stations. The project would further comply with these goals and polices by including extensive street tree and plaza tree planting which would contribute to the urban tree canopy

The Noise Element of the Uptown Community Plan includes a policy to implement the standard noise controls to reduce construction noise levels emanating from new construction in order to minimize disruption and annoyance. The project would comply with this policy by implementing standard noise controls consistent with the SDMC regulations and project specific construction noise control measures.

The Uptown Community Plan includes a Historic Preservation Element. As discussed above under the General Plan, the project was evaluated for potential impacts to historic structures. There are historic structures on-site; however, those structures are outside of portions of the medical campus planned for redevelopment and will remain as they are today. No impacts to historic resources would occur as a result of the project.

The project complies with all applicable polices and goals of the Uptown Community Plan. As such, impacts relative to consistency with the Uptown Community Plan are less than significant.

CPIOZ Consistency

As previously discussed, the project site is located with CPIOZ Type A, limiting ministerial structure height to 65 feet. Projects seeking to develop within this area of CPIOZ Type A in excess of 65 feet are required to process an SDP. The project includes structures in excess of 65 feet. As such, the project includes an SDP as one of its actions and is consistent with the requirement of CPIOZ Type A.

Land Development Code Consistency

The development areas of the project site are located within the CC-3-8 and CC-3-9 zones. The project site is currently developed with a 15-story hospital, as well as other multi-story buildings constructed between the years of 1926-2011. The existing buildings are either permitted pursuant to prior approvals and/or retain previously conforming rights, as they were constructed pursuant to previous zoning and development regulations but do not comply with all current zoning

requirements including height and FAR. Many of these structures are proposed to be demolished and replaced with new multi-story buildings. With the exception of maximum structure height, maximum floor area ratio, and maximum driveway width, the project would be consistent with the relevant regulations of the LDC. The project proposes deviations to zone regulations that apply to maximum structure height, maximum floor area ratio, and maximum driveway width, which are evaluated below. These deviations are delineated in Table 5.1-3, *Deviation Summary*. Relative to maximum structure height, development on portions of the site within the CC-3-8 zone would exceed the maximum structure height of 100 feet per Table 131-05E. The project proposes Maximum FAR of 2.72 which exceeds the maximum FAR of 2.0 for the CC-3-9 zone per Table 131-05E.

Proposed deviations are justified as the site is in the Medical Complex Neighborhood which supports the intensification of hospital and medical uses in the area. It is anticipated that the community would have an increase in medical needs throughout the coming years. Property is scarce in the project area, and developing the site to the full extent would serve these growing needs. Allowing deviations for height and FAR would enable greater capacity of the medical campus to serve the community on the site, resulting in an efficient use of the property and a reduction in overall development costs, costs that can be better expended providing healthcare. The existing hospital tower deviates from current FAR and height requirements; as such, the environmental setting of the medical campus is already the location of structures taller than those allowed by the regulations of the underlying zone. The community has become accustomed to viewing this hospital from the surrounding area. Allowing the replacement hospital to also deviate would enable a familiarity with current conditions. Further, if the proposed hospital towers are visible from the surrounding area, they would become a landmark which would be beneficial during a medical emergency.

The project has been designed to comply with the regulations of the LDC to the extent possible; however, implementation of the project in a manner that maximizes efficiency of the site would require deviations for building height, floor area ratio, and driveways shown in Table 5.1-3. The deviations are necessary to allow the site to be developed consistent with the intent of the Uptown Community Plan. Each of the requested deviations relate directly to the proposed design of the project, the property configuration, efficient and maximum use of the site area, and the surrounding development. The deviations would result in a more desirable project that efficiently utilizes the site, provides a more cohesive community appearance, allows for adequate site circulation, and improves overall functionality of the project. Other than the requested deviations, the project meets all applicable regulations and development standards in effect for this site per the LDC. These deviations would not result in significant environment impacts. Project impacts relative to the LDC would be less than significant.

Significance of Impacts

The project would be consistent with the City of San Diego General Plan (with the exception of the Noise Element), Uptown Community Plan, and Uptown Community Plan CPIOZ Type A. Relative to the Noise Element of the General Plan, the project would result in a significant construction noise impact as noise levels would exceed the SDMC during several phases of construction.

Mitigation Measures

Mitigation measure MM 5.6-1 is presented in Section 5.6, *Noise*, and would be required to reduce construction noise impacts to below a level of significance.

Project-related traffic changes would have a significant noise impact at residential locations along Fourth Avenue between Lewis Street and Arbor Drive. There is no City procedure to ensure that exterior noise affecting existing NSLUs is sufficiently attenuated to meet City standards. Therefore, there are no feasible mitigation measures to reduce traffic noise impacts to a less than significant level.

Significance of Impacts Following Implementation of Mitigation Measures

Land use impacts relative to operational noise due to an increase in vehicular trips generated by the project on Fourth Avenue would remain significant and unmitigated.

5.1.2.2 Issue 4

Issue 4: Would the project physically divide an established community?

Impact Threshold

Based on the City's Thresholds, a project could have a significant land use impact if:

- The project would physically divide an established community.

Analysis

Consistent with the General Plan and Uptown Community Plan, the project site is currently developed as a medical campus within the urban fabric of the Uptown community. Implementation of the project would result in redevelopment on portions of the hospital campus and minor roadway modifications. However, the hospital campus would function largely as it does currently, integrated into the community with pedestrian, bicycle, and vehicle circulation to and through the site. As described in Section 3.2.2, *Circulation and Mobility Improvements*, project implementation would include numerous pedestrian, bicycle, transit, and transportation improvements, which would contribute to connectivity with the community and facilitate movement to, through, and around the site. As such, the project would provide improved access to the community. No impacts relative to physically dividing a community would occur.

Significance of Impacts

The project would not physically divide an established community. Therefore, no impacts would occur.

Mitigation Measures

No mitigation measures would be required.

5.1.2.3 Issue 5

Issue 5: Would the project result in land uses which are not compatible with an adopted Airport Land Use Compatibility Plan (ALUCP) including aircraft noise levels as defined by the plan?

Impact Threshold

Based on the City's Thresholds, a project could have a significant land use compatibility impact if the project results in:

- Incompatible uses as defined in the airport land use plan or an inconsistency with an airport's land use compatibility plan as adopted by the Airport Land Use Commission to the extent that the inconsistency is based on valid data.
- If the project is proposed within the Airport Environs Overlay Zone (AEOZ) as defined in Chapter 13, Article 2, Division 3 of the San Diego Municipal Code, the potential exterior noise impacts from aircraft noise would not constitute a significant environmental impact.

The City's Thresholds also provide guidance for Airport Noise Impacts. The noise zone a project falls within and the applicable noise threshold depends on the project's location within the Airport Influence Area.

According to Chapter 3.10 of the City's General Plan Program EIR, the City implements adopted ALUCPs with the Airport Environs Overlay Zone (AEOZ). Chapter 13, Article 2, Division 3 of the SDMC defines an AEOZ as an area within a noise contour zone of the San Diego International Airport. In addition, interior noise impacts would be regulated by the requirement for residential development within the AEOZ to reduce interior noise levels attributable to airport noise to 45 CNEL. In addition, the City General Plan states that Specifically for noise, aviation easements provide the airport operator the right to subject the property to noise associated with normal airport activity. The project site is not located within the AEOZ.

Analysis

The project site is located within Review Area 2 of the AIA for the SDIA ALUCP (see Figure 2-10, *San Diego International Airport ALUCP Airport Influence Area*) and is within the Airspace Protection Boundary (Figure 5.1-1, *SDIA Airspace Protection Boundary*) and the Overflight Area Boundary (Figure 5.1-2, *SDIA Overflight Area Boundary*). Locations within the Airspace Protection Boundary require that the FAA be notified of any proposed construction or alteration having a height greater than an

imaginary surface extending 100 feet outward and one foot upward (slope of 100 to one) from the runway elevation. The ALUC issued Consistency Determination Letters for the project, and the FAA has made a Determination of No Hazard to Air Navigation letters (see Appendix X). These letters confirm that the project would not be a hazard to air navigation. As such, the project would not result in obstruction to airport operations from SDIA.

The Overflight Area Boundary applies to new residential development and requires an overflight notification agreement be recorded with the Office of the County Recorder for any new dwelling unit within the overflight area. The project does not propose any residential land uses; therefore, the overflight notification agreement is not applicable.

The project site is not within the noise contours identified on the Noise Contour Map (see Figure 5.1-3, *SDIA Noise Contour Map*). The project site is not within the safety zones identified on the Safety Compatibility Zones Map. Therefore, no impacts would result.

The project has also been issued *Determination of No Hazards to Air Navigation* from the FAA, based on conceptual building heights and locations, demonstrating no risk relative to obstruction of aircraft (see Appendix B). Separate FAA notifications would be required at the time of building permits for future structures.

Significance of Impacts

The project would not result in a land use that would be incompatible with either the San Diego International Airport. Therefore, impacts would be less than significant.

Mitigation Measures

No mitigation would be required.

Table 5.1-1. City of San Diego General Plan Consistency

General Plan Components	Project Consistency
Guiding Principles	
4. Employment centers for a strong economy	The project would retain and enhance an existing employment center, thereby contributing to the local economy now and into the future.
Land Use and Community Planning Element	
<i>City of Villages Strategy</i>	
Goal. Mixed-use villages located throughout the City and connected by high-quality transit.	The project's institutional (medical) land uses contribute to the mixed-use nature of the adjacent Hillcrest neighborhood. The project is served by existing bus transit.
<i>Balanced Communities and Equitable Development</i>	
Policy LU-H.6. Provide linkages among employment sites, housing, and villages via an integrated transit system and a well-defined pedestrian and bicycle network.	The project would improve pedestrian connectivity through the provision of contiguous and non-contiguous sidewalks with landscaping to include street trees, as discussed in Section 3.2.2.1. Additionally, the project would provide bicycle improvements along Washington Street and Fifth Avenue, as discussed in Section 3.2.2.2. The project would implement a Transportation Demand Management Program in accordance with the CAP Consistency Checklist for the project.
Mobility Element	
<i>Walkable Communities</i>	
Goal. A safe and comfortable pedestrian environment.	The project would improve pedestrian connectivity through the provision of contiguous and non-contiguous sidewalks with landscaping to include street trees, as discussed in Section 3.2.2.1. Project improvements to the pedestrian network would increase comfort for the users.
Goal. A complete, functional, and interconnected pedestrian network, that is accessible to pedestrians of all abilities.	Pedestrian improvements would be constructed to meet all code requirements to ensure accessibility to pedestrians of all abilities.
Goal. Greater walkability achieved through pedestrian-friendly street, site and building design.	The project would improve pedestrian connectivity through the provision of contiguous and non-contiguous sidewalks with landscaping to include street trees, as discussed in Section 3.2.2.1. Project buildings would be oriented toward the pedestrian to the extent possible, facilitating wayfinding and supporting walkability.
Policy ME-A.4. Make sidewalks and street crossings accessible to pedestrians of all abilities. a. Meet or exceed all federal and state requirements. b. Provide special attention to the needs of children, the elderly, and people with disabilities. c. Maintain pedestrian facilities to be free of damage or trip hazards.	Pedestrian improvements would be constructed to meet all code requirements to ensure accessibility to pedestrians of all abilities.
Policy ME-A.5. Provide adequate sidewalk widths and clear path of travel as determined by street	Pedestrian improvements would be constructed to meet all code requirements, to include sidewalk

General Plan Components	Project Consistency
classification, adjoining land uses, and expected pedestrian usage. a. Minimize obstructions and barriers that inhibit pedestrian circulation. b. Consider pedestrian impacts when designing the width and number of driveways within a street segment.	widths and clear paths of travel. There are 11 existing driveways and nine proposed by the project resulting in a net decrease in driveways/curb opening.,
<i>Transportation Demand Management</i>	
Policy ME-E.1. Support and implement TDM strategies including, but not limited to: alternative modes of transportation, alternative work schedules, and telework.	The project's Local Mobility Assessment (LLG 2022) includes a Transportation Demand Management (TDM) Program. This includes such strategies as a transit subsidy, flexible or alternative work hours, transit improvements, provision of a carpool program with designated preferred carpool parking spaces, and telecommuting.
Policy ME-E.2. Maintain and enhance personal mobility options by supporting public and private transportation projects that will facilitate the implementation of Transportation Demand Management (TDM) strategies.	
Policy ME-E.5. Support SANDAG's efforts to market TDM benefits to employers and identify strategies to reduce peak period employee commute trips.	The project's TDM Program includes market of transit information. This strategy includes installation of information board in the hospital and medical office building lobbies and participation in SANDAG's iCommute Program.
Policy ME-E.6. Require new development to have site designs and on-site amenities that support alternative modes of transportation. Emphasize pedestrian and bicycle-friendly design, accessibility to transit, and provision of amenities that are supportive and conducive to implementing TDM strategies such as car sharing vehicles and parking spaces, bike lockers, preferred rideshare parking, showers and lockers, on-site food service, and child care, where appropriate.	Project pedestrian, bicycle, and transit improvements are described in Sections 3.2.2.1, 3.2.2.2, and 3.2.2.3, respectively. As described, the project's site design supports alternative transportation modes, emphasizes pedestrian accessibility, and provides bicycle facilities. Additionally, the project's Local Mobility Assessment (LLG 2022) includes a TDM Program. This includes such strategies as a transit subsidy, flexible or alternative work hours, transit improvements, transit improvements, provision of a carpool program with designated preferred carpool parking spaces, and telecommuting. Pursuant to the project's CAP Consistency Checklist, the project would provide the required amount of shared vehicle parking spaces, bicycle parking in the appropriate form to the function (short-term and long-term), and showers and lockers. Due the project's location within the urban core of the Hillcrest neighborhood, food service and child care are accessible within walking, bicycling, and transit distance from the site.
<i>Bicycling</i>	
Policy ME-F.4. Provide safe, convenient, and adequate short- and long-term bicycle parking facilities and other bicycle amenities for employment, retail, multifamily housing, schools and colleges, and transit facility uses.	The project would provide bicycle parking in compliance with the City's minimum CAP Consistency Checklist and code requirements. The project also includes amenities to support bicycle travel, such as showers and lockers.

General Plan Components	Project Consistency
<ul style="list-style-type: none"> a. Continue to require bicycle parking in commercial and multiple unit residential zones. b. Provide bicycle facilities and amenities to help reduce the number of vehicle trips. 	
<i>Parking Management</i>	
<p>Goal. Increased land use efficiencies in the provision of parking.</p>	<p>The project involves redevelopment of certain parking locations on-site. This parking would be replaced with more efficient parking facilities, either as below-grade parking integrated into project buildings or as stand-alone parking structures.</p>
<i>Urban Design Element</i>	
<i>General Urban Design</i>	
<p>Goal. A City with distinctive districts, communities, neighborhoods, and village centers where people gather and interact.</p>	<p>The Scripps Mercy Hospital Campus contributes to the distinctive character of the Medical Complex neighborhood of the Uptown community. Redevelopment with statement architecture, enhanced landscaping, and gateway design components would further contribute to the distinctive character of this neighborhood.</p>
<p>Policy UD-A.3.¹ Design development adjacent to natural features in a sensitive manner to highlight and complement the natural environment in areas designated for development.</p> <ul style="list-style-type: none"> a. Integrate development on hillside parcels with the natural environment to preserve and enhance views, and protect areas of unique topography. b. Minimize grading to maintain the natural topography, while contouring any landform alterations to blend into the natural terrain. c. Utilize variable lot sizes, clustered housing, stepped-back facades, split-level units or other alternatives to slab foundations to minimize the amount of grading. f. Provide increased setbacks from canyon rims or open space areas to ensure that the visibility of new development is minimized. g. Screen development adjacent to natural features as appropriate so that development does not appear visually intrusive, or interfere with the experience within the open space system. The provision of enhanced landscaping adjacent to natural features could be used to soften the appearance of or buffer development from the natural features. h. Use building and landscape materials that blend with and do not create visual or other conflicts 	<p>The project site includes natural features in the forms of slopes and Mercy Canyon. Redevelopment of the site would not intrude into these natural features.</p>

¹ Only sub-policies relevant to the project are listed. For a complete list of sub-policies to UD-A.3 refer to the City of San Diego General Plan.

General Plan Components	Project Consistency
<p>with the natural environment in instances where new buildings abut natural areas. This guideline must be balanced with a need to clear natural vegetation for fire protection to ensure public safety in some areas.</p> <ul style="list-style-type: none"> i. Ensure that the visibility of new development from natural features and open space areas is minimized to preserve the landforms and ridgelines that provide a natural backdrop to the open space systems. For example, development should not be visible from canyon trails at the point the trail is located nearest to proposed development. Lines-of-sight from trails or the open space system could be used to determine compliance with this policy. j. Design and site buildings to permit visual and physical access to the natural features from the public right-of-way. k. Encourage location of entrances and windows in development adjacent to open space to overlook the natural features. l. Protect views from public roadways and parklands to natural canyons, resource areas, and scenic vistas. n. Provide public pedestrian, bicycle, and equestrian access paths to scenic view points, parklands, and where consistent with resource protection, in natural resource open space areas. p. Design structures to be ignition and fire-resistant in fire prone areas or at-risk areas as appropriate. Incorporate fire-resistant exterior building materials and architectural design features to minimize the risk of structure damage or loss due to wildfires. 	
<p>Policy UD-A.4. Use sustainable building methods in accordance with the sustainable development policies in the Conservation Element.</p>	<p>The project would employ sustainable building methods consistent with Title 24, the City's CAP, and waste management requirements. (See Section 5.7 for a discussion of the project's CAP Consistency Checklist and Section 5.9 for a discussion of the project's Waste Management Plan.)</p>
<p>Policy UD-A.5. Design buildings that contribute to a positive neighborhood character and relate to neighborhood and community context.</p> <ul style="list-style-type: none"> a. Relate architecture to San Diego's unique climate and topography. b. Encourage designs that are sensitive to the scale, form, rhythm, proportions, and materials in proximity to commercial areas and residential neighborhoods that have a well established, distinctive character. 	<p>Project design would contribute to a positive neighborhood character and relate to the neighborhood and community context. The project site is currently developed with hospital, medical office, and support buildings/structures at a variety of intensities and exhibiting a variety of architectural style. The project would redevelop select buildings on-site with modern, more efficient versions of existing uses.</p>

General Plan Components	Project Consistency
<ul style="list-style-type: none"> c. Provide architectural features that establish and define a building's appeal and enhance the neighborhood character. d. Encourage the use of materials and finishes that reinforce a sense of quality and permanence. e. Provide architectural interest to discourage the appearance of blank walls for development. This would include not only building walls, but fencing bordering the pedestrian network, where some form of architectural variation should be provided to add interest to the streetscape and enhance the pedestrian experience. For example, walls could protrude, recess, or change in color, height or texture to provide visual interest. f. Design building wall planes to have shadow relief, where pop-outs, offsetting planes, overhangs and recessed doorways are used to provide visual interest at the pedestrian level. g. Design rear elevations of buildings to be as well-detailed and visually interesting as the front elevation, if they will be visible from a public right-of-way or accessible public place or street. h. Acknowledge the positive aspects of nearby existing buildings by incorporating compatible features in new developments. i. Maximize natural ventilation, sunlight, and views. j. Provide convenient, safe, well-marked, and attractive pedestrian connections from the public street to building entrances. k. Design roofs to be visually appealing when visible from public vantage points and public rights-of-way. 	<p>Redevelopment would be sensitive to the existing scale, form, rhythm, proportions, and materials both on-site and in the surroundings to ensure visual cohesion and compatibility. Architectural style and elements would be selected and utilized to establish and define the character of the buildings and the evolving nature of the campus, as well as to create a landmark identity at the project location. Materials would be of a high quality and would reinforced a sense of permanence. Buildings would be designed with a 360-degree attention to detail on all sides due to the placement of these buildings with existing development on all sides and blank walls would be avoided through the inclusion of windows, doors, landscaping, and variations in building materials and architectural elements. Entrances would be clearly defined for the pedestrian.</p>
<p>Policy UD-A.6. Create street frontages with architectural and landscape interest to provide visual appeal to the streetscape and enhance the pedestrian experience.</p> <ul style="list-style-type: none"> a. Locate buildings on the site so that they reinforce street frontages. b. Relate buildings to existing and planned adjacent uses. c. Ensure that building entries are prominent, visible, and well-located. d. Maintain existing setback patterns, except where community plans call for a change to the existing pattern. e. Minimize the visual impact of garages, parking and parking portals to the pedestrian and street façades. 	<p>Especially due to the nature of the project as a community-serving medical campus, street frontages would be designed to reinforce and orient the pedestrian. Because redevelopment would occur within an existing campus, new buildings would be related to those remaining on campus, as well as within the surroundings. Building entries would be prominent, visible, and in a location that provides logical and convenient access. Existing setback patterns would be maintained, where applicable. Parking would be predominantly incorporated into buildings as below-grade structures; above-grade parking structures would be architecturally integrated into the campus.</p>

General Plan Components	Project Consistency
<p>Policy UD-A.8. Landscape materials and design should enhance structures, create and define public and private spaces, and provide shade, aesthetic appeal, and environmental benefits.</p> <ol style="list-style-type: none"> a. Maximize the planting of new trees, street trees and other plants for their shading, air quality, and livability benefits (see also Conservation Element, Policies CE-A.11, CE-A.12, and Section J). b. Use water conservation through the use of drought-tolerant landscape, porous materials, and reclaimed water where available. c. Use landscape to support storm water management goals for filtration, percolation and erosion control. d. Use landscape to provide unique identities within neighborhoods, villages and other developed areas. e. Landscape materials and design should complement and build upon the existing character of the neighborhood. f. Design landscape bordering the pedestrian network with new elements, such as a new plant form or material, at a scale and intervals appropriate to the site. This is not intended to discourage a uniform street tree or landscape theme, but to add interest to the streetscape and enhance the pedestrian experience. g. Establish or maintain tree-lined residential and commercial streets. Neighborhoods and commercial corridors in the City that contain tree-lined streets present a streetscape that creates a distinctive character. <ol style="list-style-type: none"> 1. Identify and plant trees that complement and expand on the surrounding street tree fabric. 2. Unify communities by using street trees to link residential areas. 3. Locate street trees in a manner that does not obstruct ground illumination from streetlights. h. Shade paved areas, especially parking lots. i. Demarcate public, semi-public/private, and private spaces clearly through the use of landscape, walls, fences, gates, pavement treatment, signs, and other methods to denote boundaries and/or buffers. j. Use landscaped walkways to direct people to proper entrances and away from private areas. 	<p>Landscape materials and design would unify the campus landscape to provide a sense of cohesiveness and clarify and simplify wayfinding and improve overall visitor experience. A key strategy is to develop a simple landscape framework including unifying streetscapes, articulating campus edges, defining and reinforcing the unique Scripps Mercy character. In addition, given its urban/ canyon setting, the site concept balances security with creating a welcoming environment by providing clear and secure boundaries that are softened by and well-integrated with planted buffers.</p> <p>A series of landscape zones/plant palettes have been identified and classified. The zones relate to the form, function and character of the plant material in relationship to site program. The following discussion outlines the various zones and identifies criteria and general character of materials anticipated for the zones.</p> <p>Canyon accent zone located in narrow courtyards between buildings and adjacent properties and also visitor drop-off/ entry plaza, extending to intersection of Washington and Fifth Avenue. This palette includes clustered groups of palm trees or canopy trees to provide screening, understory planting of succulents, , native grasses and perennial accents, large boulder and cobble mulch to discourage gathering and encampments as well as retain grade in steep conditions.</p> <p>Accent zone located throughout campus at circulation nodes, gathering and waiting areas and as focal accents. This palette includes canopy and flowering accents trees located at patios and seating areas to provide shade and comfort and at key focal points and understory planting of succulents, flowering shrubs, groundcovers and perennials, and grasses</p> <p>Screening/ buffer-chaparral canyon zone located along the canyon interface on the east side of the site at Sixth Avenue and at the Sixth Avenue staff parking structure. The intent is to tie into existing canyon landscape and includes native trees and evergreen shrubs in drifts, masses and groves to provide screened views in and out of the site.</p>

General Plan Components	Project Consistency
<p>k. Reduce barriers to views or light by selecting appropriate tree types, pruning thick hedges, and large overhanging tree canopies.</p> <p>l. Utilize landscape adjacent to natural features to soften the visual appearance of a development and provide a natural buffer between the development and open space areas.</p>	<p>Screening/ buffer-evergreen ornamental: zone located along the uptown interface on the west and south sides, and within the campus complex where privacy and screening are concerns. The intent is to provide a “green wall” or soft screen that feels garden-like and includes evergreen shrubs in formal rows, clipped as hedges or loose masses bark or rock mulch at all planting areas</p> <p>Bio-filtration planting: zone located at stormwater treatment areas as indicated on plans. The intent is to use materials that express riparian character of natural streams and arroyos and includes masses of rushes, reeds, grasses and flowering accent shrubs and perennials</p> <p>Streetscape zone located along Fifth Ave, Lewis and Washington Streets. The intent is to provide clean, low maintenance and uniform streetscape palette that communicates continuity within the campus and includes street trees per streetscape manual or to match opposite side of street understory planting is evergreen groundcover or grasses in continuous bands.</p> <p>Sustainable site development</p> <p>Opportunities for sustainable design reinforces the campus-wide importance of the surrounding natural environment and achieves a strong performance for the buildings. Such efforts will help shape Scripps Mercy as a unique and environmentally sustainable complex.</p> <p>Several sustainable practices are being or could be proposed for the site: Storm water management:</p> <ul style="list-style-type: none"> • bio filtration retention basins that allow for storm water capture and treatment • Reduce heat island effect: • trees and planting to provide shade and create cool micro-climates • light colored paving materials <p>Water efficiency:</p> <ul style="list-style-type: none"> • native and naturalized drought tolerant plant palettes reflective of the surrounding canyon plant palette and locally adapted non-native and non-invasive plant species

General Plan Components	Project Consistency
	<ul style="list-style-type: none"> centralized irrigation system and irrigation monitoring technology to provide water efficiency Recycled and sustainable materials: <ul style="list-style-type: none"> use of certified sustainable wood for site furnishings and other site elements use of recycled materials for hardscape, landscape and site furnishing materials.
<p>Policy UD-A.9. Incorporate existing and proposed transit stops or stations into project design (see also Mobility Element, Policies ME-B.3 and ME-B.9).</p> <ol style="list-style-type: none"> Provide attractively designed transit stops and stations that are adjacent to active uses, recognizable by the public, and reflect desired neighborhood character (see also Land Use Element, Policy LU-I.11). Design safe, attractive, accessible, lighted, and convenient pedestrian connections from transit stops and stations to building entrances and street network (see also Land Use Element, Policy LU-I.10). Provide generous rights-of-way for transit, transit stops or stations. Locate buildings along transit corridors to allow convenient and direct access to transit stops/stations. 	<p>The project includes improvements to the existing transit stop by incorporating a bus shelter and maps/wayfinding signs. Connections from adjacent project buildings would be designed to be safe, accessible, and appropriately lit.</p>
<p>Policy UD-A.11. Encourage the use of underground or above-ground parking structures, rather than surface parking lots, to reduce land area devoted to parking (see also Mobility Element, Section G).</p> <ol style="list-style-type: none"> Design safe, functional, and aesthetically pleasing parking structures. Design structures to be of a height and mass that are compatible with the surrounding area. Use building materials, detailing, and landscape that complement the surrounding neighborhood. Provide well-defined, dedicated pedestrian entrances. Use appropriate screening mechanisms to screen views of parked vehicles from pedestrian areas, and headlights from adjacent buildings. Pursue development of parking structures that are wrapped on their exterior with other uses to conceal the parking structure and create an active streetscape. Where ground floor commercial is proposed, provide a tall, largely transparent ground floor along pedestrian active streets. 	<p>With the exception of a small surface parking lot outside of the Emergency Department, all new parking provided by the project would either be within below-grade integrated structures or stand-alone parking garages. The small surface lot would incorporate perimeter landscaping to minimize its appearance and visually enhance the open parking.</p>

General Plan Components	Project Consistency
<p>g. Encourage the use of attendants, gates, natural lighting, or surveillance equipment in parking structures to promote safety and security.</p>	
<p>Policy UD-A.13. Provide lighting from a variety of sources at appropriate intensities and qualities for safety.</p> <p>a. Provide pedestrian-scaled lighting for pedestrian circulation and visibility.</p> <p>b. Use effective lighting for vehicular traffic while not overwhelming the quality of pedestrian lighting.</p> <p>c. Use lighting to convey a sense of safety while minimizing glare and contrast.</p> <p>d. Use vandal-resistant light fixtures that complement the neighborhood and character.</p> <p>e. Focus lighting to eliminate spill-over so that lighting is directed, and only the intended use is illuminated.</p>	<p>Any new lighting would be placed in a manner that reduces the illumination standard and provides appropriate levels of illumination. Lighting would be provided at the appropriate scale for the intended user (pedestrian-scaled lighting in pedestrian areas versus vehicular-focused lighting in vehicle circulation areas).</p>
<p>Policy UD-4.14. Design project signage to effectively utilize sign area and complement the character of the structure and setting</p> <p>a. Architecturally integrate signage into project design.</p> <p>b. Include pedestrian-oriented signs to acquaint users to various aspects of a development. Place signs to direct vehicular and pedestrian circulation.</p> <p>c. Post signs to provide directions and rules of conduct where appropriate behavior control is necessary.</p> <p>d. Design signs to minimize negative visual impacts.</p> <p>e. Address community-specific signage issues in community plans, where needed.</p>	<p>Signage for the project would integrate with the overall architecture for the project and includes pedestrian-oriented and vehicles directional signs. The project includes a Comprehensive Sign Plan to ensure that project signage effectively utilizes sign area and complements the character of the structure and setting. As described in Section 3.8, the Comprehensive Sign Plan proposes to modify applicable sign requirements and proposes signs that, as a whole, are in conformance with the intent of the City's sign regulations, result in an improved relationship among the sign and building façades on the premises, and better serve the hospital campus. Overall, for wall-signs, the project would not exceed the maximum amount allowed by the City's sign regulations when totaling all existing and proposed wall signs, including signage proposed for non-public right-of-way signs. Additionally, all ground mounted signs would be at the property line or set back from the property line and would be located outside the visibility triangles. The Comprehensive Sign Plan would not result in negative visual impacts.</p>
<p>Policy UD-A.17. Incorporate Crime Prevention Through Environmental Design (CPTED) measures, as necessary, to reduce incidences of fear and crime, and design safer environments.</p> <p>a. Design projects to encourage visible space and "eyes on the street" security that will serve as a means to discourage and deter crime through the location of physical features, activities and people to maximize visibility.</p>	<p>The project's design incorporates clear boundaries between private spaces and semi-public areas. Additionally, building design would include windows, entrances, and other features that activate the ground plane and/or allow for "eyes on the street" security. Lighting would be provided throughout the campus and security would additionally be provided, as necessary.</p>

General Plan Components	Project Consistency
<p>b. Define clear boundaries between public, semi-public/private, and private spaces.</p> <p>c. Promote regulations, programs, and practices that result in the proper maintenance of the measures employed for CPTED surveillance, access control, and territoriality.</p> <p>d. Consider pedestrian scale lighting and indirect techniques to provide adequate security but not glare and flood-light conditions.</p>	
Public Facilities, Services, and Safety Element	
<i>Healthcare Services and Facilities</i>	
<p>Goal. Public and private healthcare services and facilities that are easily accessible and meet the needs of all residents.</p>	<p>The project provides a major medical campus within the heart of San Diego within easy walking, bicycling, and transit distance (the project is located adjacent to an existing bus stop, for which the project would provide a bus shelter) for many residents, thereby contributing to the healthcare services to meet the needs of San Diego.</p>
<p>Policy PF-O.1. Encourage the provision of diverse, adequate, and easily accessible healthcare facilities and services to meet the needs of all residents.</p> <p>a. Strive to locate healthcare facilities and services near public transit.</p>	
<p>Policy PF-O.2. Coordinate with providers so that the expansion or construction of new healthcare facilities addresses General Plan and community plan goals.</p>	
Conservation Element	
<i>Climate Change and Sustainable Development</i>	
<p>Policy CE-A.5. Employ sustainable or "green" building techniques for the construction and operation of buildings.</p> <p>(a) Develop and implement sustainable building standards for new and significant remodels of residential and commercial buildings to maximize energy efficiency, and to achieve overall net zero energy consumption by 2020 for new residential buildings and 2030 for new commercial buildings. This can be accomplished through factors including, but not limited to:</p> <ul style="list-style-type: none"> • Designing mechanical and electrical systems that achieve greater energy efficiency with currently available technology; • Minimizing energy use through innovative site design and building orientation that addresses factors such as sun-shade patterns, prevailing winds, landscape, and sun-screens; • Employing self-generation of energy using renewable technologies; • Combining energy efficient measures that have longer payback periods with 	<p>The project would be designed to meet Title 24 requirements, which addresses sustainable development. The project would also incorporate sustainable building and site design by designing buildings that meet CALGreen, California Green Building Standards Code, reduce energy use through building orientation, construct and operate buildings using materials and methods that promote healthful indoor air quality, consider re-use of building materials, low wattage and/or LED light features, and use of low flow shower heads, faucets, and toilets.</p>

General Plan Components	Project Consistency
<p>measures that have shorter payback periods;</p> <ul style="list-style-type: none"> Reducing levels of non-essential lighting, heating and cooling; and <p>Using energy efficient appliances and lighting</p>	
<p>Policy CE-A.7. Construct and operate buildings using materials, methods, and mechanical and electrical systems that ensure a healthful indoor air quality. Avoid contamination by carcinogens, volatile organic compounds, fungi, molds, bacteria, and other known toxins.</p> <ol style="list-style-type: none"> Eliminate the use of chlorofluorocarbon-based refrigerants in newly constructed facilities and major building renovations and retrofits for all heating, ventilation, air conditioning, and refrigerant-based building systems. Reduce the quantity of indoor air contaminants that are odorous or potentially irritating to protect installers and occupants' health and comfort. Where feasible, select low-emitting adhesives, paints, coatings, carpet systems, composite wood, agri-fiber products, and others. 	<p>As a medical use, project buildings would be constructed and operated in such a manner as to ensure healthful indoor air quality. The project would utilize building materials and methods directed at improving indoor air quality. HVAC units would utilize filters that help screen-out harmful pollutants, operable windows would allow for natural ventilation, and the project's open courtyards and offsetting planes would allow for air flow through the site.</p>
<p>Policy CE-A.8. Reduce construction and demolition waste in accordance with Public Facilities Element, Policy PF-I.2, or by renovating or adding on to existing buildings, rather than constructing new buildings.</p>	<p>Relative to the utilization of existing structures, the project purpose is to expand and modernize the hospital campus. Additionally, Senate Bill 1953 requires all general acute care hospitals buildings to meet enhanced structural seismic requirements. As such, the reuse of older structures proposed for demolition is not feasible.</p>
<p>Policy CE-A.9. Reuse building materials, use materials that have recycled content, or use materials that are derived from sustainable or rapidly renewable sources to the extent possible, through factors including:</p> <ul style="list-style-type: none"> Scheduling time of deconstruction and recycling activities to take place during project demolition and construction phases; Using life cycle costing in decision-making for materials and construction techniques. Life cycle costing analyses the costs and benefits over the life of a particular product, technology, or system. Removing code obstacles to using recycled materials in buildings and for construction; and Implementing effective economic incentives to recycle construction and demolition debris (see also Public Facilities Element, Policy PF-I.2). 	<p>Consistent with the project's Waste Management Plan and Policy PF-I.2, the project would reduce its construction and demolition waste. Additionally, consistent with the project's WMP, building materials would utilize recycled content where possible, as well as materials derived from a renewable source. The WMP and Citywide regulations establish recycling requirements, which would be adhered to as part of the project's overall operations.</p>
<p>Policy CE-A.10. include features in buildings to facilitate recycling of waste generated by building occupants and associated refuse storage areas.</p>	<p>Consistent with the regulations of SDMC Chapter 12, Article 2, Division 8, <i>Refuse and Recyclable Materials Storage Requirements</i>, the project would provide storage area on-site for refuse and recyclable materials. Additionally, smaller receptacles would be</p>

General Plan Components	Project Consistency
<p>a. Provide permanent, adequate, and convenient space for individual building occupants to collect refuse and recyclable material.</p> <p>b. Provide a recyclables collection area that serves the entire building or project. The space should allow for the separation, collection and storage of paper, glass, plastic, metals, yard waste and other materials as needed.</p>	<p>located throughout the campus to allow for recycling and refuse disposal.</p>
<p>Policy CE-A.11. Implement sustainable landscape design and maintenance.</p> <p>a. Use integrated pest management techniques, where feasible, to delay, reduce, or eliminate dependence on the use of pesticides, herbicides, and synthetic fertilizers.</p> <p>b. Encourage composting efforts through education, incentives, and other activities.</p> <p>c. Decrease the amount of impervious surfaces in developments, especially where public places, plazas and amenities are proposed to serve as recreation opportunities (see also Recreation Element, Policy RE-A.6 and A.7).</p> <p>d. Strategically plant deciduous shade trees, evergreen trees, and drought tolerant native vegetation, as appropriate, to contribute to sustainable development goals.</p> <p>e. Reduce use of lawn types that require high levels of irrigation.</p> <p>f. Strive to incorporate existing mature trees and native vegetation into site designs.</p> <p>g. Minimize the use of landscape equipment powered by fossil fuels.</p> <p>h. Implement water conservation measures in site/building design and landscaping.</p> <p>i. Encourage the use of high efficiency irrigation technology, and recycled site water to reduce the use of potable water for irrigation. Use recycled water to meet the needs of development projects to the maximum extent feasible. (see Policy CE-A.12).</p>	<p>The project would implement sustainable landscape design and maintenance including a centralized irrigation system and irrigation monitoring technology to provide water efficiency, use of native and naturalized drought tolerant plant palettes reflective of the surrounding canyon plant, use of light colored paving materials, bio-filtration retention basins that allow for storm water capture and treatment, use of trees and planting to provide shade and create cool micro-climates, and use of recycled materials for hardscape, landscape and site furnishing materials.</p>
<p>Policy CE-A.12. Reduce the San Diego Urban Heat Island, through actions such as:</p> <ul style="list-style-type: none"> • Using cool roofing materials, such as reflective, low heat retention tiles, membranes and coatings, or vegetated eco-roofs to reduce heat build-up; • Planting trees and other vegetation, to provide shade and cool air temperatures. In particular, properly position trees to shade buildings, air conditioning units, and parking lots; and 	<p>Consistent with the project's CAP Consistency Checklist, the project would utilize cool roofing materials. Additionally, the project would extensive streetscape and interior landscaping, which would include shade trees and other vegetation. As previously mentioned, with the exception of a small surface lot at the Emergency Department, project parking would be accommodated in below-grade structures and stand-alone parking garages. Stand-alone parking garages would incorporate into any roof deck parking areas the requirements of SDMC</p>

General Plan Components	Project Consistency
<ul style="list-style-type: none"> Reducing heat buildup in parking lots through increased shading or use of cool paving materials as feasible (see also Urban Design Element, Policy UD-A.12). 	§142.0407, <i>Additional Vehicular Use Area Requirements</i> , which includes the planting of trees or solar shade structures, which would further contribute to the reduction in urban heat island effect. Elevated canopies/awnings and shading elements are included in the project design.
Air Quality	
CE-F.4. Preserve and plant trees, and vegetation that are consistent with habitat and water conservation policies and that absorb carbon dioxide and pollutants.	The project includes an extensive landscaping plan, which includes trees and vegetation that are appropriate for the habitat and consistent with City landscaping water conservation policies.
Noise Element	
Noise and Land Use Compatibility	
Policy NE-A.2. Assure the appropriateness of proposed developments relative to existing and future noise levels by consulting the guidelines for noise-compatible land use (shown on Table NE-3) to minimize the effects on noise-sensitive land uses.	Section 5.6, <i>Noise</i> , of this EIR addresses project consistency with General Plan Table NE-3. As concluded in Section 5.6, and consistent with Policy NE-A.4, a project-specific noise analysis has been conducted. The Noise Study concluded that project would result in significant impacts from construction noise at NSLUs and exterior project-related traffic noise at residential locations along Fourth Avenue between Lewis Street and Montecito Drive. MM 5.6-2 would be implemented to reduce construction noise impacts to below a level of significance. There is no City procedure to ensure that exterior noise affecting existing NSLUs is sufficiently attenuated to meet City standards, and therefore no feasible mitigation measures to reduce traffic noise impacts to a less than significant level. This impact would remain significant and unmitigated.
Policy NE-A.4. Require an acoustical study consistent with Acoustical Study Guidelines (Table NE-4) for proposed developments in areas where the existing or future noise level exceeds or would exceed the “compatible” noise level thresholds as indicated on the Land Use-- Noise Compatibility Guidelines (Table NE-3), so that noise mitigation measures can be included in the project design to meet the noise guidelines.	
Motor Vehicle Traffic Noise	
Policy NE-B.4. Require new development to provide facilities which support the use of alternative transportation modes such as walking, bicycling, carpooling and, where applicable, transit to reduce peak-hour traffic.	The project would provide pedestrian, bicycle, and transit improvements, as collectively described in Section 3.2.2. Carpooling would be facilitated through both a carpooling program and preferred carpool parking, as described in the project’s TDM.

Table 5.1-2. Uptown Community Plan Consistency

Community Plan Components	Project Consistency
Land Use Element	
Goal. A distribution of land uses that provides for a range of goods and services, facilities, and activities that meets the needs of the community.	The project allows for the continued operation of Scripps Mercy Hospital and its associated buildings, which provide medical services that meet the needs of the community and the City.
Goal. Opportunities for new medical and professional office development.	The project would result in new medical and professional office buildings, in addition to the new hospital buildings.

Community Plan Components	Project Consistency
Goal. Adequate transitions between new and existing development.	Project redevelopment would be primarily interior to the site, allowing for existing buildings on the periphery within the hospital campus to provide transitions between the hospital campus and surrounding uses, as they do currently. Along Washington Street, transition would be provided via a series of plazas and streetscape features.
Goal. Compatibility of uses within established neighborhoods.	The project site is identified in the Uptown Community Plan as Medical Complex and is currently operating as a medical campus. The project would allow for the continuation of this use. As the project would be a continuation of an existing use already planned for and operating in the community, the project is a compatible use within the established community.
Policy LU-1.3. Protect public health by evaluating the effects of noise and air pollution from airport operations and freeway traffic on community land uses and reduce, or eliminate where feasible, negative effects on sensitive land uses (including housing, schools and outdoor athletic areas) through appropriate buffers, barriers and construction measures.	As part of this EIR, health and safety (Chapter 7.0, Section 7.5), noise (Section 5.6), and air quality (Section 5.4) have been analyzed. Mitigation measures are provided, as applicable and where feasible, to reduce or eliminate negative effects on sensitive land uses.
Policy LU-2.15. Support the intensification of existing hospital uses on institutionally-designated areas rather than expanding into residential or commercial areas.	The project would allow for the intensification of existing hospital uses within the current campus footprint, rather than expanding into residential or commercial areas.
Policy LU-2.16. Evaluate proposed institutional uses for appropriate development intensity and effects on visual quality and neighborhood character. Additional factors, such as those related to mobility, noise, and parking demand should also be evaluated as needed.	Visual effects and community character (Section 5.3), transportation/circulation (Section 5.2), and noise (Section 5.6) have been analyzed as part of this EIR. As concluded in the analysis, the redevelopment on-site would be compatible in design the surrounding neighborhood, including residential and open space areas. As described in Section 5.2, the project would not have any transportation VMT impacts and would include improvements to off-site pedestrian, bicycle, and vehicle circulation elements.
Policy LU-2.18. Ensure that new office development with the Medical Complex neighborhood is evaluated for design compatibility (building height, architectural detailing, setbacks, access, lot configuration, and views), relationship to residential development and open space, and potential traffic circulation impacts.	
Mobility Element	
Goal. Safe, walkable neighborhoods which utilize pedestrian connections and improved sidewalks to create a comfortable pedestrian experience.	The project includes enhanced pedestrian connections, including new contiguous and non-contiguous sidewalks and plaza elements, to create a comfortable pedestrian experience.
Policy MO-1.12. Support pedestrian improvements that promote safe connections along Washington Street from Lincoln Avenue to the bridge over State Route 163 in Hillcrest.	A contiguous sidewalk would be installed along the project's frontage on Washington Street as part of the project, which would improve the pedestrian environment.

Community Plan Components	Project Consistency
Policy MO-1.16. Create more definable pedestrian connections between the Medical Complex neighborhood and Hillcrest through the use of crosswalks, signalization, and pavement variations.	All intersections would have added painted continental crosswalks and Americans with Disabilities Act (ADA) curb ramps per current City standards.
Policy MO-2.8. Accommodate future bicycle parking needs as ridership increases. <ul style="list-style-type: none"> a. Encourage businesses to promote ridership through the acquisition and provision of bicycle parking facilities. b. Consider the use of multi colored bicycle racks (e.g. integrated with existing parking meters) to promote visibility and awareness. 	Bicycle parking would be provided within the project as identified in the project’s CAP Consistency Checklist. Additionally, showers and lockers would be provided to serve cyclists.
Policy MO-3.4. Include public art, shade trees, and landscaping surrounding bus stops, where appropriate, to improve the environment and encourage the use of public transportation.	The project proposes to add a shelter and wayfinding signage at existing bus stop to improve the environment and encourage the use of public transportation.
Policy MO-4.4. Provide street trees, street lighting, and implement a wayfinding program.	Street trees would be provided on Washington Street, Fourth Avenue, and Fifth Avenue, and would include a combination of Community Plan-identified tree species and unique tree species. Street lighting is currently provided and would be maintained. Internal campus wayfinding would be implemented at pedestrian intersections as shown on the signage plans.
Policy MO-4.8. Implement traffic operational improvements that support and facilitate ingress and egress movements of emergency vehicles accessing the Medical Hospital Complex neighborhood.	The project proposes two dedicated driveways off Fifth Avenue for emergency vehicle ingress and egress movements. In addition, an Emergency Department drop-off area would be provided fronting the Hospital Support Building curb that would be served by a dedicated traffic signal with emergency vehicle pre-emption equipment on Washington Street.
Policy MO-5.1. Utilize Intelligent Transportation System (ITS) improvements to improve safety, efficiency, service and reduce congestion, including but not limited to traffic signal coordination, pedestrian and bicycle detection, traffic and transit information, and transit priority measures. Deployment of ITS improvements should be targeted along Park Boulevard, Washington Street, University Avenue, Fifth Avenue, and Sixth Avenue.	The project would support implementation of ITS strategies by providing smart parking technology for the largest campus parking structure at the Sixth Avenue parking garage (1,250 parking spaces). In addition, dynamic transit information would be provided in the lobbies of the MOB and Hospital buildings.
Policy MO-5.2. Support implementation of ITS strategies such as smart parking technology, traffic and transit information dynamic message signs, traffic signal coordination, and transit priority.	
Policy MO-5.3. Encourage accommodation of emerging technologies such as car charging stations and self-driving/automated vehicles in future infrastructure and development projects, especially in new office and multifamily structures.	The project would provide electric car charging stations, in accordance with City regulations and the CAP Consistency Checklist.

Community Plan Components	Project Consistency
Policy MO-6.1. Encourage new commercial and institutional developments, as well as any new stand-alone parking facilities to provide parking spaces for car-sharing.	The project would include integrated parking, primarily in the form of structured parking. Car-sharing spaces would be provided and identified in accordance with the project's CAP Consistency Checklist.
Policy MO-6.4. Encourage large employers such as hospitals and the San Diego School District to provide transit passes at reduced rates to employees/students and to allow for flexible work schedules in order to shift trips to off-peak periods.	The project's CAP Consistency Checklist includes several TDM measures (such as a transit subsidy and flexible work schedules) that are directed at reducing single occupancy travel during peak commute hours.
Policy MO-7.3. Encourage screening on-site parking by locating it in areas not highly visible from the street corridor or by using landscaped islands and border landscaping.	On-site parking would be primarily structured parking integrated into new building development. Surface parking would be minimal and would be screened with project landscaping and landscaped islands.
Policy MO-7.4. Implement below-ground parking and parking structures for new development as alternatives when surface parking is inadequate or would result in large paved areas without adequate space for landscaping amenities.	On-site parking would be primarily structured parking integrated into new building development.
Policy MO-7.5. Limit driveway curb cuts to the extent possible to maximize the curb length available for on-street parking. Driveway access should be provided through alleys or shared driveways.	<p>The project would limit curb cuts to the extent possible. Curb cut modifications would occur at the following locations:</p> <ul style="list-style-type: none"> • Washington Street: no existing driveways to be closed; one proposed driveway – net increase of one driveway • Fourth Avenue: one existing driveway to be closed; no proposed driveways – net decrease of one driveway • Fifth Avenue: six existing driveways to be closed; three proposed driveways – net decrease of three driveways • Sixth Avenue: one existing driveway to be reconfigured to provide one inbound and one outbound driveway – net increase of one driveway
Policy MO-7.7. Provide electric vehicle charging stations in parking garages, near parks and public facilities and in mixed-use developments.	Electric vehicle charging stations would be integrated into the project's parking, as required by City regulations and the project's CAP Consistency Checklist.
Urban Design Element	
Goal. Development Diversity.	The project supports development diversity both within the hospital campus and within the broader Hillcrest context by allowing for guided redevelopment of the hospital campus.
Goal. Buildings with appropriate Scale and Graceful Transitions.	Building heights of new structures would range from three to 15 stories, with stepbacks and protrusions incorporated into the design buildings, such as the hospital towers and medical office buildings. These design elements allow for the buildings to adopt

Community Plan Components	Project Consistency
	appropriate scale adjacent to other existing structures, and provides transitions between older and new development on- and off-site.
Goal. Sustainable Development.	The project would be constructed to meet Title 24 guidelines and to be consistent with the project's CAP Consistency Checklist, which results in a sustainable development.
Policy UD-3.2. Maintain a consistent design character along the length of a block and on a district level through coordinated design, type, color and material of street furniture.	Streetscape site furnishings would be consistent in character including design, type, color, and material in accordance with the Uptown Community Plan.
Policy UD-3.3. Landscape the public streetscape with shade producing street trees and other vegetation as a means of adding color and visual interest, softening the urban edges, providing shade, and assisting with air quality and stormwater management.	Streetscape trees would include Hong Kong orchid tree along Washington Street and Fourth Avenue, Chinese pistachio along the north/south portions of Fifth Avenue, and Bradford flowering pear along the east/west portions of Fifth Avenue. These street trees would provide shade and visual interest due to their seasonal coloration, and would soften the urban edge, provide shade, and assist with air quality and stormwater management.
Policy UD-3.5. Provide benches in sidewalks, plazas, parks, transit stops, and other high pedestrian use areas to further promote pedestrian use.	The project includes a series of plazas that with seating elements to serve employees, staff, and visitors of the hospital and associated medical offices and facilities. Seating areas are provided throughout campus plan. A bus shelter would be added with wayfinding sign at the existing bus stop.
Policy UD-3.6. Provide benches constructed of durable and low maintenance materials, and reflect the design character of the area.	
Policy UD-3.8. Encourage landscaping, screening and architectural design to enhance the appearance of hospital facilities. In particular, Mercy Hospital as viewed from the Sixth Avenue extension and the appearance of the Arbor Street parking structure, Bachman Canyon parking structure, and hillside areas within the UCSD Medical Center facility and the Somerset Hillcrest adjacent to Mercy Hospital.	Scripps Mercy Hospital has landscaping and screening at the parkways and around the campus. Additionally, there is landscaping along Sixth Avenue at Scripps Mercy Hospital. Landscaping would be maintained and/or enhanced with the project.
Policy UD-3.11 Coordinate the pole and fixture design with other street furniture and amenities to establish an attractive and unified design character.	New fixtures and furniture on the project site would be coordinated with what is existing to ensure a unified design character.
Policy UD-3.12. Maintain a low height of light fixtures to establish a pedestrian-scaled environment and to minimize light spill into adjoining properties.	Any new light fixtures would be at the appropriate height for the use, including low height fixtures to aid pedestrian circulation as well as for security. Light fixtures would be fitted with appropriate screening methods to minimize light spill into adjoining properties.
Policy UD-3.13. Encourage the placement of lights in close proximity so that the illumination standard may be reduced and provides appropriate levels of illumination.	Any new lighting would be placed in close proximity so that the illumination standard may be reduced and provides appropriate levels of illumination.
Policy UD-3.15. Place street lighting to focus on illuminating the pedestrian zone (e.g., sidewalks, paseos, plazas, alleys, transit stops), rather than the	Any new lighting would focus on illuminating the pedestrian zone rather than the vehicular zone, except where necessary for safety and visibility and

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vehicular zone (i.e., the street). Minimize the use of tall, cobra-head lighting to the degree possible.	to avoid pedestrian/vehicle conflicts. The use of tall, cobra-head lighting would be minimized to the degree possible.
Policy UD-3.16. Select color-balanced lamps that provide a warm white illumination and realistic color rendition.	Any new lighting would include color-balanced lamps to the extent possible.
Policy UD-3.19. Locate refuse containers regularly at intersections, near major building entrances, near bus stops, and adjacent to outdoor seating areas.	Refuse containers would be located throughout the project site, including at major building entrances and adjacent to outdoor seating areas.
Policy UD-3.20. Choose containers that include an area for recycling, prevent wind and rain from entering the container, facilitate convenient access to the liner, and have the option of being anchored to the pavement.	Refuse receptacle would include an area for recycling or separate recycling containers would be provided. Container design would be selected taking into account wind/rain prevention, liner access, anchoring option, and coordination with other on-site furnishings.
Policy UD-3.21. Coordinate refuse containers with the overall style and aesthetic of other street furnishings.	
Policy UD-3.22. Include tree grates or other porous materials in commercial areas and areas with high pedestrian activity to protect trees and reduce pedestrian safety hazards. In areas with lower levels of pedestrian activity, alternatives such as accent planting, decomposed granite or pavers, may be employed instead of tree grates.	Tree grates would be used along Washington Street within the right-of-way because of the high pedestrian use. All other trees would be located within parkways or continuous planting areas that would help protect the trees and promote healthy tree growth.
Policy UD-3.23. Coordinate tree grate design and materials with overall character of the street and neighborhood and other street furnishings.	See response to UD-3.22. Tree grates on Washington Street would match Uptown Streetscape Standards.
Policy UD-3.24. Consider grates that allow for integrated tree guards, decorative lighting, electrical fixtures and auxiliary power (for special events, holiday lighting, or maintenance).	See response to UD-3.22. Tree grates on Washington Street would match Uptown Streetscape Standards.
Policy UD-3.25. Encourage the use of 3-sided tree guards that have proven to increase the survivorship of new trees, require less maintenance, and minimize trip hazards as an alternative to using tree grates.	Project would provide for the use of 3-sided tree guards.
Policy UD 3.26. Locate street trees in tree grates and/or within paved areas planted in a structural soil medium that extends from the street curb to the full width of the adjacent property line or, if narrower, the extent of the mature canopy to maintain long-term health.	The project would comply with the City's required planting area.
Policy UD-3.37. Utilize street trees to give scale and definition to corridors and to slow traffic. Street tree locations may include sidewalk zones, parking lanes, and median strips.	Street trees would be included along Washington Street, Fourth Avenue, and Fifth Avenue to provide scale, definition, and identity to these streets within and surrounding the project site and provide
Policy UD-3.63. Utilize street trees to establish a linkage between blocks.	linkages to areas to the north and south of the site. These streets would include non-contiguous
Policy UD-3.64. Utilize large canopy street trees where appropriate.	sidewalks with landscaped parkways. Street trees would include large canopy trees and would be

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Policy UD-3.65. Space trees consistently at equal intervals to provide rhythm and continuity.	planted as regular intervals, where possible, to provide rhythm and continuity.
Policy UD-3.66. Plant trees in areas where sufficient root growth and drainage can be accommodated.	The project's planting plan would ensure that trees would be planted in areas where sufficient root growth and drainage can be accomplished.
Policy UD-3.67. Utilize structural soils over compacted soils, open planters with shrubs, groundcover over tree grates, and deep tree well pits with corner subsurface drainage options for tree plantings.	To the extent possible, the project would utilize structural soils over compacted soils, open planters with shrubs, groundcover over tree grates, and deep tree well pits with corner subsurface drainage options for tree plantings.
Policy UD-3.68. Utilize tree root barriers along walkways in order to minimize sidewalk upheaval.	Tree root barriers would be utilized along walkways in order to minimize sidewalk upheaval.
Policy UD-3.69. Create a network of green streets that provides urban greening features that enhance the pedestrian and bicycle environment, incorporates storm water management features, and provides opportunities for additional street trees.	The project would include landscaping along Washington Street, Fifth Avenue, and Fourth Avenue, as well as internal circulation elements, to contribute to the network of green streets within the Hillcrest neighborhood and the Uptown Community. These greening features, combined with other green street elements such as landscape parkways and non-contiguous sidewalks, would enhance the pedestrian and bicycle environment, incorporate stormwater management features, and provide opportunities for additional street trees.
<p>Policy UD-3.70. Employ the following guidelines in selecting street trees:</p> <ul style="list-style-type: none"> • In order to support a comfortable pedestrian environment, street trees should have sufficient canopy to provide shading to the pedestrian zone. Spacing of trees will be dependent on species selected, but should be based on the ability to reasonably achieve shading of at least 50% of the public right-of-way within ten (10) years of planting, and provide a nearly continuous canopy at maturity. • Tree species should be suited to the San Diego climate and not require significant water, pesticides, or fertilizer to maintain health. • Native or naturalized tree species provide more suitable habitat and nesting for local birds and wildlife. • Trees that are overly messy (e.g., heavy shedding of bark, leaves or seed pods) or have invasive root systems that can heave sidewalks or break pipes should be avoided. • Tree species need to be chosen to avoid potential conflicts with overhead or underground utilities, or with adjacent structures. 	<p>The tree selections were based on these criteria and the Uptown Community Plan.</p> <p>The project utilizes Bauhinia along Washington Street to match the adjacent existing street trees within this corridor. Pistacia and Pyrus would be used on Fifth Avenue to match the adjacent street trees. Ulmas would be used on Fourth Avenue to match the existing street trees along this street block.</p>

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<ul style="list-style-type: none"> • Broad canopy type trees should be selected for streets that are particularly wide and/or where shade is desirable. • Tree canopies should not be so dense that they obscure views of the street from upper floor windows or obstruct filtered light from reaching the pedestrian zone. • Tree species that have distinctive flowers, bark, or other special characteristic are particularly effective on pedestrian-oriented streets. • Palm trees should only be used as design or character defining elements and should be restricted to the corners of intersections and major entry ways. 	
<p>Policy UD-4.9. Avoid blank walls. They should be landscaped or decorated in a manner that makes them visually interesting.</p>	<p>Blank walls would be avoided by the placement of windows and combination of architectural elements and materials such as vertical and horizontal louvers, glazing, metal panels, tile, and stone.</p>
<p>Policy UD-4.12. Group windows to establish rhythms across the façade and hierarchies at important places on the façade.</p>	<p>Windows would be grouped by composition of clear to spandrel panel and are visible from the public realm all around the buildings.</p>
<p>Policy UD-4.13. Include windows along all walls visible from the public realm.</p>	
<p>Policy UD-4.14. Use high-quality, durable building materials and finishes in all projects.</p>	<p>The project would utilize high-quality and durable building materials, such as metal panels, stone, and tile.</p>
<p>Policy UD-4.15. Design buildings with materials and colors that relate to masses and volumes. Changes in material or color should be designed with a change in the wall plane.</p>	<p>Project elevations have multiple materials (such as tile, glazing, and metal panel) that would change per wall plane and relate the building mass to surrounding context.</p>
<p>Policy UD-4.18. Incorporate lighting that complements and enhances building design and reinforces neighborhood character.</p>	<p>Project lighting would be incorporated such that it complements and enhances building design and reinforces neighborhood character.</p>
<p>Policy UD-4.19. Consider the use of lighting to ensure public safety and enhance nighttime activities.</p>	<p>Lighting would be utilized as appropriate to ensure public safety.</p>
<p>Policy UD-4.20. Incorporate signage that complements building design and contributes to neighborhood character.</p>	<p>Project signage would be incorporated such that it complements building design and contributes to neighborhood character.</p>
<p>Policy UD-4.21. Construct signs of high-quality materials such as wood, metal, or stone.</p>	<p>Signage would incorporate similar materials as building design, which includes metal, stone, and tile.</p>
<p>Policy UD-4.22. Design signs as an integral part of the building, consistent with its architectural style, scale, materials, and color.</p>	<p>Signage would be integrated into building and project design and would be consistent with project style, scale, materials, and color.</p>
<p>Policy UD-4.23. For buildings on corner lots, consider locating entrances at the corner to anchor the intersection and create a seamless transition that captures pedestrian activity from both street frontages.</p>	<p>The project would result in the development of one new buildings on a corner lot. To the extent possible, these buildings would locate entrances near the corner to anchor the intersection and create a seamless transition that captures pedestrian activity from both street frontages. Where it is not feasible</p>

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	to locate building entrances at the corner, pedestrian connectivity elements and wayfinding signage would be provided to draw pedestrian activity to the appropriate entrance location.
<p>Policy UD-4.24. Accentuate a building’s corner location with architectural features that actively engage the public realm and create a visual presence at the corner, such as the inclusion of:</p> <ul style="list-style-type: none"> • Chamfered or rounded corners • Projecting and recessed balconies and entrances • Accentuating features such as embellished doorways and volumetric manipulations (e.g., corner tower) • Enhanced window designs that may include floor-to-ceiling windows, display windows, clerestory windows, or distinctive glass design or colors 	The public corner at Washington Street and Fifth Avenue would be engaged with a canopy marking the project’s main entrance. The corners of the tower would be constructed as fly-by panels, thus softening the edge of the building.
<p>Policy UD-4.26. Encourage new development to enhance adjacent transit stops located at corner intersections by providing shelters and benches of unique design and/or incorporating public art elements as of part them.</p>	The project would add a shelter and wayfinding signage at existing bus stop.
<p>Policy UD-4.27. Consider using canopies and awnings in buildings to provide pedestrians with protection from the heat and rain, and to add variety to storefronts and building entries. Canopies and awnings should be:</p> <ul style="list-style-type: none"> • Consistent with the building’s architectural style and avoid obscuring distinctive architectural features • Either permanent architectural features that incorporate materials consistent with the building’s architecture, or colored fabric mounted over a metal structural frame • Utilize quality materials and avoid shiny or flimsy fabric 	Building entrances would incorporate permanent recesses and overhangs to provide protection from heat and rain for pedestrians and to create variety at building entrances.
<p>Policy UD-4.31. Utilize sunshades to control solar exposure into building interiors in order to limit heat gain, prevent glare, and enhance daylighting by re-directing and deflecting sunlight. With the emphasis on creating more sustainable buildings, the use of sunshades is expected to become ever more prevalent.</p>	Solar sunshades on would be provided on north and south façades to limit heat gain, prevent glare, and enhance daylighting.
<p>Policy UD-4.32. Design rooftops in an expressive and contextual manner, with mechanical areas and equipment appropriately screened so that they are not visible from streets and other public areas.</p>	All mechanical equipment would be fully screened. The lower rooftops, which can be seen from above, would have decorative gravel patterns to emulate landscape.
<p>Policy UD-4.33. Screen and integrate all mechanical penthouses and stair towers into the form of the building.</p>	All mechanical penthouses and/or stair towers would be screened and/or integrated into the form of the building.

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<p>Policy UD 4.34. Consider using green roofs, roof gardens or rooftop patios so that they can enhance rooftop appearance from surrounding buildings.</p>	<p>The entry pavilion building (Hospital Support Building) would feature a rooftop patio with space for employee dining.</p>
<p>Policy UD-4.35. Integrate semi-public outdoor spaces such as on-site plazas, patios, courtyards, paseos, terraces and gardens to address the public realm and support pedestrian activity and community interaction. These are strongly encouraged in larger projects exceeding approximately one acre in size.</p>	<p>The project exceeds one-acre in size. The project site currently includes Mercy Gardens, an approximately 32,000-square-foot outdoor space with planting, hardscape, and grass area. This space currently serves as a place for passive enjoyment for employees, patients, and visitors to the hospital campus. It is also accessible to members of the surrounding community.</p> <p>The proposed project retains Mercy Staff Memorial Garden and further enhances outdoor space on-site with a series of wellness courts and landscaped areas, bringing the total landscaped outdoor space on-site appropriate for passive enjoyment to approximately 181,000 square feet. This series of wellness courts provide accessible, safe, and secure spaces to serve the health care needs of the community, acting as the primary entry to the new Hospital Support Building and hospital towers. This series of wellness courts include landscaping (thematic trees, as well as shrubs, perennials, grasses, and groundcovers of various thematic planting palettes) and retaining walls that provide dual-purpose as seating.</p> <p>Public sidewalks and landscape parkways throughout the project would serve and enhance pedestrian circulation to the hospital buildings and the internal pedestrian circulation network, and would allow for pedestrian interaction. The project is consistent with this policy</p>
<p>Policy UD-4.36. Delineate plazas and courtyards through building and landscape design. Ensure that plazas and courtyards are comfortably scaled, landscaped for shade and ornamentation, furnished with areas for sitting, and lighted for evening use. Courtyards should be surrounded by active façades or landscape treatments.</p>	<p>Appropriate lighting would be provided and integrated into project and plaza design to ensure comfort, safety, and security of both users and the hospital. Mercy Staff Memorial Garden, an established outdoor space on the campus, is delineated by its location within the campus as a focal point, as well as by its unique composition of terraced hardscape, rose gardens, and fountain. A series of wellness courts with incorporated areas for sitting is a new central amenity for the project and an important feature of the greater landscape plan. The landscape palette ensures that the Wellness Entry Court shares cohesive elements with the surrounding project landscaping. As such, surrounding landscape elements, including public sidewalks with landscaped parkways, complement</p>

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	<p>the Wellness Entry Court and clearly mark and unify access to healthcare services on the campus, resulting in increased visibility at the node. These elements are connected via the project’s internal sidewalk network, as well as consistent and complementary landscaping palettes.</p>
<p>Policy UD-4.37. Provide a variety of seating options, such as benches, seat walls, and broad steps. Private patios may be located in courtyards if they are defined by a low wall or hedge.</p>	<p>Seating would be provided as low retaining walls and/or benches, which would comfortably accommodate employees, patients, and visitors to the hospital campus. Private patios are not applicable, as no residential or commercial development is proposed.</p>
<p>Policy UD-4.38. Provide opportunities for public open spaces in neighborhood centers, villages, and nodes.</p>	<p>The project proposes redevelopment on the Scripps Mercy Hospital Campus, which is identified as a neighborhood center and node. As noted in the Uptown Community Plan, there are nodes of retail, employment, and mixed-use that create centers within Uptown’s neighborhoods, which form the basis for located village place types identified by the General Plan. Uptown Community Plan Policy UD-4.38 addresses the provision of <i>opportunities</i> (emphasis added) for public open spaces in neighborhood centers, villages, and nodes and does not require such features to be dedicated or provided.</p> <p>The project’s series of wellness courts, as well as Mercy Staff Memorial Garden, provide an opportunity for accessible, safe, and secure areas to serve employees, patients, and visitors of the Scripps Mercy Hospital Complex. These wellness courts complement and enhance the existing Mercy Staff Memorial Garden and on-site outdoor spaces, and would be privately owned, maintained, and managed by Scripps Mercy Hospital as the Mercy Staff Memorial Garden is currently.</p>
<p>Policy UD-4.39. Orient public spaces within private development towards the public right-of- way and frame with active building façades (e.g., entrances, windows, balconies, etc.) that help activate the space and provide “eyes on the street” for security.</p>	<p>Mercy Staff Memorial Garden is visible from the public rights-of-way of Fifth Avenue, Fourth Avenue, and Lewis Street. A series of wellness courts would be provided and oriented toward the public right-of-way of Fifth Avenue. Continuing internal to the site, the wellness courts would be framed by the active façade of the new hospital buildings and include a hardscape area located adjacent to the main hospital and hospital support building entries. Windows from the hospital buildings, as well as surrounding new and existing buildings, would have views of the wellness courts, providing “eyes of the street” for additional security beyond what is routinely provided by the hospital.</p>

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<p>Policy UD-4.42. Incorporate outdoor terraces to building façade stepbacks to increase opportunities not only for on-site amenities and common space but for the potential for elevated publicly-accessible spaces.</p>	<p>The project site is fully developed with the Scripps Mercy Hospital Campus. The elevation within the developed portion of the site is generally level. Redevelopment would result in some of the existing buildings being demolished, while others would remain. All structures would be institutional (hospital), , or office in uses supporting the medical hospital. On-site amenities are not applicable, due to the land use of the project. Similarly, elevated publicly-accessible spaces would not be appropriate, as it is not the intention of the project to create public spaces within the various new structures, beyond those designed for use by hospital patrons and employees. Building façade stepbacks are not necessary, due to the land use of the project, as well as the proposed uses of the new buildings and consistency with Uptown Community Plan Policy LU-2.15. Incorporation of stepbacks would hinder the ability to intensify as necessary on-site, as the project already provides existing and future outdoor space on the ground level, easily accessible to site users and passers-by.</p>
<p>Policy UD-4.49. Design and locate buildings with a strong orientation to the primary street frontage to define the pedestrian environment with main building entrances facing the street rather than parking lots.</p>	<p>Primary pedestrian entrances of new buildings would be oriented toward to the street or on the frontage perpendicular to the street, to the extent possible. With the exception of the new Emergency Department parking lot, which would include approximately nine parking spaces as well as ambulance drop off spaces, no new surface parking lots are proposed with the project.</p>
<p>Policy UD-4.51. Maintain quality architectural articulation and finishes around all visible sides of the buildings, not just the building fronts.</p>	<p>All sides of the buildings would maintain quality architectural articulation and finishes.</p>
<p>Policy UD-4.52. Discourage surface parking between the building frontage and the public street right-of-way.</p>	<p>The only surface parking proposed for the project is a new Emergency Department parking lot, which would include approximately nine parking spaces, as well as ambulance drop off spaces. This parking lot would be located between the new Hospital I building and Fifth Avenue. Due to the nature and purpose of this parking lot, it is unable to be located elsewhere. The parking lot would have landscaping integrated on three sides, including along Fifth Avenue, and would not result in a detriment to the pedestrian experience along Fifth Avenue.</p>
<p>Policy UD-4.53. Encourage compatibility with established setbacks within the immediate neighborhood in order to maintain an existing front yard rhythm and character.</p>	<p>The project's setbacks would be compatible with the setbacks within the immediate neighborhood.</p>

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Policy UD-4.54. Incorporate building features that allow natural ventilation, maximize daylight, reduce water consumption, and minimize solar heat gain.	The project would utilize sunshades on north and south façades, high performance glazing, and fritted glass to minimize solar heat gain. Landscaping has been designed to reduce water consumption.
Policy UD-4.55. Incorporate features that provide shade, passive cooling, and reduce daytime heat gain. <ul style="list-style-type: none"> a. Incorporate architectural treatments such as eaves, awnings, canopies, trellises, or cornice treatments at entrances and windows. b. Shade exposed south and west facing façades using shrubs and vines. 	All entrances and drop-offs would have canopies, eaves, and trellises. Landscaping has been strategically placed to provide shading for sidewalks and seating areas.
Policy UD-4.56. Incorporate inset windows and well-designed trims and details that provide shading and reduce solar heat gain.	Project would utilize sunshade on north and south façades, high performance glazing, and fritted glass to minimize solar heat gain.
Policy UD-4.57. Incorporate green roofs and vegetated roof systems along with gardens to help reduce solar heat gain.	Project would incorporate gardens on the plaza deck at the entry pavilion (Hospital Support Building) and wherever else possible on campus.
Policy UD-4.58. Incorporate white or reflective paint on rooftops and light paving materials to reflect heat away from buildings and reduce the need for mechanical cooling.	All high roofs would incorporate white PVC membrane.
Policy UD-4.59. Incorporate elements to use renewable energy such as small low-impact wind turbines or photo-voltaic panels on flat roofs that are discretely located to limit any visibility from the street or glare to adjacent properties.	Project would utilize photovoltaics on entry pavilion (Hospital Support Building).
Policy UD-4.60. Minimize impervious surfaces that have large thermal gain.	Impervious surfaces would be minimized to the extent possible via project landscaping and bioswales.
Policy UD-4.61. Encourage recycled, rapidly renewable, and locally sourced materials that reduce impacts related to material extraction, processing, and transportation.	Recycled, rapidly renewable, and locally sourced materials that reduce impacts related to material extraction, processing, and transportation would be utilized to the extent possible.
Policy UD-4.62. Incorporate sustainable landscape treatments such as artificial turf, drought-tolerant, and climate-appropriate plant species, planting materials, and light-colored paving materials.	Project landscaping includes drought-tolerant and climate-appropriate plant species and planting materials, as well as light-colored paving materials, where appropriate.
Policy UD-4.63. Orient buildings to minimize the extent of west facing façades and openings.	Hospital I and Hospital II would be massed with north-south facing façades to minimize heat gain.
Policy UD-4.65. Utilize decorative vertical shading and fins on the east and west facing building façades as integrated design features with a sustainable benefit.	Select façades would utilize shading devices such as fins and heavily fritted glazing.
Policy UD-4.66. Design buildings to allow for cross ventilation and minimize solar heat gain. <ul style="list-style-type: none"> a. Provide vents or windows with low openings on western facing façades to capture cooler breezes into a building. 	As a healthcare facility, proposed buildings would be mechanically ventilated.

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<p>b. Provide vents or clerestory windows on eastern façades to naturally allow warmer air that collects near ceilings to escape.</p>	
<p>Policy UD-4.67. Provide groundcover plantings to keep ground surfaces cooler near building façades particularly in place of concrete and other reflective surfaces.</p>	<p>Groundcover planting has been incorporated into the project planting plan.</p>
<p>Policy UD-4.70. Encourage the restoration and maintenance of older structures that may not be historically designated but nonetheless contribute to the unique character of Uptown.</p>	<p>The project purpose is to expand and modernize the hospital campus. Additionally, Senate Bill 1953 requires all general acute care hospitals buildings to meet enhanced structural seismic requirements. As such, the reuse of older structures is not feasible. However, the project would maintain six buildings on-site, maintaining the character of the hospital campus.</p>
<p>Policy UD-4.87. Consider the dominant architectural style of adjacent buildings including roof forms, architectural feature, and materials.</p>	<p>New hospital buildings would relate back to the historic roots of the campus by repurposing material responses into the modern architecture, such as terracotta color tile on the ground plane that relates to the historic Spanish colonial architecture.</p>
<p>Policy UD-4.92. Design higher scale buildings with their bulk and massing oriented towards the street except within the blocks east along Fifth Avenue in the Hillcrest core, where the bulk and massing should transition away towards Sixth Avenue in order to preserve and maintain its pedestrian scale.</p>	<p>Buildings have been designed to orient bulk and massing toward the street.</p>
Economic Prosperity Element	
<p>Goal. Expansion of medical related development and employment.</p>	<p>The project allows for the Scripps Mercy Hospital Campus to expand and modernize in a manner that continues to serve the community and provides medical-related employment within the Uptown Community. The project would allow for Scripps to continue and enhance its quality of care and supports employment growth in the medical sector.</p>
<p>Policy EP-1.5. Promote growth of Uptown's health sector enhancing the areas reputation for quality care and to support the expected employment growth in this sector.</p>	
Conservation Element	
<p>Goal. Implementation of sustainable development and "green" building practices to reduce dependence on non-renewable energy sources, lower energy costs, reduce emissions and water consumption.</p>	<p>Project would meet energy saving measures per the requirements of Title 24 and CalGreen.</p>
<p>Goal. Preservation and expansion of the urban forest.</p>	<p>The project would include extensive street tree and plaza tree planting, which contributes to the urban tree canopy.</p>
<p>Policy CE-1.1. Build upon the existing community's street grid network to create a more functional environment for pedestrians and bicyclists in order to reduce local dependence on the automobile as a mode of transportation (also reference the Walkability, Bicycling, and Transit policies within the Mobility Element).</p>	<p>The project would expand the functionality of the existing pedestrian circulation network by creating contiguous and non-contiguous sidewalks along Washington Avenue, Fourth Avenue, and Fifth Avenue.</p>

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<p>Policy CE-1.3. Employ sustainable building techniques for the construction and operation of buildings, which could include solar photovoltaic and energy storage installations, electric vehicle charging stations, plumbing for future solar water heating, or other measures.</p>	<p>Project would provide solar photovoltaic panels, as well as electric vehicle charging stations.</p>
<p>Policy CE-2.20. Incorporate sustainable site planning practices (Low Impact Development) that work with the natural hydrology of a site, including the design or retrofit of landscaped or impervious areas to better capture and use storm water runoff on site. Show leadership by incorporating innovative features in public buildings and park projects.</p>	<p>Proposed development would be in compliance with the City of San Diego Storm Water Quality Management Plan and would provide storm water treatment BMPs to capture and treat runoff on new impervious areas. The existing drainage pattern would be maintained and post-development peak runoff would be less than the pre-development condition.</p>
<p>Policy CE-2.21. Identify opportunities for additional hydromodification management measures to protect natural drainages from erosion and other problems. Give particular attention to the steeper canyon drainages receiving runoff directly from developed areas through storm drains or other conveyance systems.</p>	<p>Mercy Canyon and the existing steep slope along Sixth Ave would be protected in place to the maximum extent possible. During construction, project would comply with the Construction General Permit and would implement Storm Water Pollution Prevention Plan BMPs to prevent erosions. The project would also implement post-construction hydromodification BMPs to match the pre-development condition.</p>
<p>Policy CE-2.22. Maintain best management practices in all development to limit erosion and sedimentation.</p>	<p>BMPs would be implemented during construction to limit erosion and sedimentation. Project landscaping would limit erosion and/or sedimentation that may occur during project operation.</p>
<p>Policy CE-2.23. Create “green” streets within Uptown per the recommendations in the Urban Design Element.</p>	<p>The project would contribute to the creation of green streets along Washington Avenue, Fourth Avenue, and Fifth Avenue by adding landscaping that includes street trees such as white orchid, golden medallion, and strawberry trees, accent plants such as agave, sage, and red yucca and streetscape plants such as rockrose, bougainvillea, and blue flax lily.</p>
<p>Policy CE-3.3. Encourage street tree and private tree planting programs as well as the retention of mature landscaping throughout the community to increase adsorption of carbon dioxide and pollutants. (See also Urban Design Section 4.3)</p>	<p>The project would plant street trees along Washington Street, Fourth Avenue, and Fifth Avenue (outside of the public right-of-way).</p>
Noise Element	
<p>Policy NE-1.9. Implement the standard noise controls to reduce construction noise levels emanating from new construction to minimize disruption and annoyance.</p> <ol style="list-style-type: none"> a. Limit construction activity hours. b. Equip all internal combustion engine- driven equipment with intake and exhaust mufflers that are in good condition and appropriate for the equipment. 	<p>Project construction would implement standard noise controls consistent with the SDMC regulations and MM 5.6-1 (5.6, <i>Noise</i>) to reduce noise impacts from construction to below a level of significance.</p>

Community Plan Components	Project Consistency
<ul style="list-style-type: none"> c. Locate stationary noise-generating equipment (e.g. compressors) as far as possible from adjacent residential receivers. d. Acoustically shield stationary equipment located near residential receivers with temporary noise barriers. e. Utilize "quiet" air compressors and other stationary noise sources where technology exists. f. Encourage construction contractors to prepare a detailed construction plan identifying the schedule for major noise generating construction activities that includes coordination with adjacent residents so that construction activities can be scheduled to minimize noise disturbance. g. Encourage construction contractors to designate a "disturbance coordinator" who would be responsible for responding to any complaints about construction noise. 	

Table 5.1-3. Deviation Summary

Deviation Description	Building/Lot	Deviation from SDMC	Required	Proposed	Purpose for Deviation
Max Structure Height (ft)	Medical Office Building	Table 131-05E	100'-0"	150'-0"	1. The site is in the Medical Complex Neighborhood of the Uptown Community Plan, which supports the intensification of hospital and medical uses in the area. 2. It is anticipated the community will have an increase in medical needs throughout the coming years. Property is scarce in this area and developing the site to the full extent will serve these growing needs. 3. Although the bed-count for the new development will not increase, changes in the way modern healthcare is delivered has changed dramatically over the years. For example, individual hospital rooms are now a standard of care in the industry. Allowing deviations for height and FAR will enable more facilities on the site, which is an efficient use of the property that will reduce overall development costs. Costs that can be better expended providing healthcare. 4. The existing hospital tower deviates from current FAR and height requirements, thereby setting a precedent on the site. The community has become accustomed to viewing this hospital from the surrounding area. Further, if the proposed hospital towers are visible from the surrounding area they will become a landmark, which is beneficial during a medical emergency.
	Hospital I			315'-0"	
	Hospital II			252'-8"	
	Hospital Support Building			130'-0"	
Max Floor Area Ratio	Lot 1 Lot 2 Lot 3 Lot 4 Lot 5	Table 131-05E	2.0	2.37	

Table 5.1-4. City of San Diego Noise Compatibility Guidelines

Land Use Category	Exterior Noise Exposure (dBA CNEL)			
	60	65	70	75
<i>Parks and Recreational</i>				
Parks, Active and Passive Recreation				
Outdoor Spectator Sports, Golf Courses; Water Recreational Facilities; Indoor Recreation Facilities				
<i>Agricultural</i>				
Crop Raising and Farming; Community Garden, Aquaculture, Dairies; Horticulture Nurseries & Greenhouses; Animal Raising, Maintain & Keeping; Commercial Stables				
<i>Residential</i>				
Single Dwelling Units; Mobile Homes		45		
Multiple Dwelling Units *For uses affected by aircraft noise, refer to Policies NE-D.2. & NE-D.3.		45	45*	
<i>Institutional</i>				
Hospitals; Nursing Facilities; Intermediate Care Facilities; Kindergarten through Grade 12 Educational Facilities; Libraries; Museums; Child Care Facilities		45		
Other Educational Facilities Including Vocational/Trade Schools; Colleges and Universities		45	45	
Cemeteries				
<i>Retail Sales</i>				
Building Supplies/Equipment; Food, Beverages & Groceries; Pets & Pet Supplies; Sundries, Pharmaceutical & Convenience Sales; Wearing Apparel & Accessories			50	50
<i>Commercial Services</i>				
Building Services; Business Support; Eating & Drinking; Financial Institutions; Maintenance & Repair; Personal Services			50	50
Assembly & Entertainment (includes public and religious assembly); Radio & Television Studios; Golf Course Support				
Visitor Accommodations		45	45	45
<i>Offices</i>				
Business & Professional; Government; Medical, Dental & Health Practitioner; Regional & Corporate Headquarters			50	50
<i>Vehicle and Vehicular Equipment Sales and Service Use</i>				
Commercial or Personal Vehicle Repair & Maintenance; Commercial or Personal Vehicle Sales & Rentals; Vehicle Equipment & Supplies Sales & Rentals; Vehicle Parking				
<i>Wholesale, Distribution, Storage Use Category</i>				
Equipment & Materials Storage Yards; Moving & Storage Facilities; Warehouse; Wholesale Distribution				
<i>Industrial</i>				
Heavy Manufacturing; Light Manufacturing; Marine Industry; Trucking & Transportation Terminals; Mining & Extractive Industries				
Research & Development				50
Compatible	Indoor Uses	Standard constructions methods should attenuate exterior noise to an acceptable indoor noise level. Refer to Section I.		

Land Use Category			Exterior Noise Exposure (dBA CNEL)			
			60	65	70	75
45, 50	Conditionally Compatible	Outdoor Uses	Activities associated with the land use may be carried out.			
		Indoor Uses	Building structure must attenuate exterior noise to the indoor noise level indicated by the number (45 or 50) for occupied areas. Refer to Section I.			
	Outdoor Uses	Feasible noise mitigation techniques should be analyzed and incorporated to make the outdoor activities acceptable. Refer to Section I.				
Incompatible	Indoor Uses	New construction should not be undertaken.				
	Outdoor Uses	Sever noise interference makes outdoor activities unacceptable.				

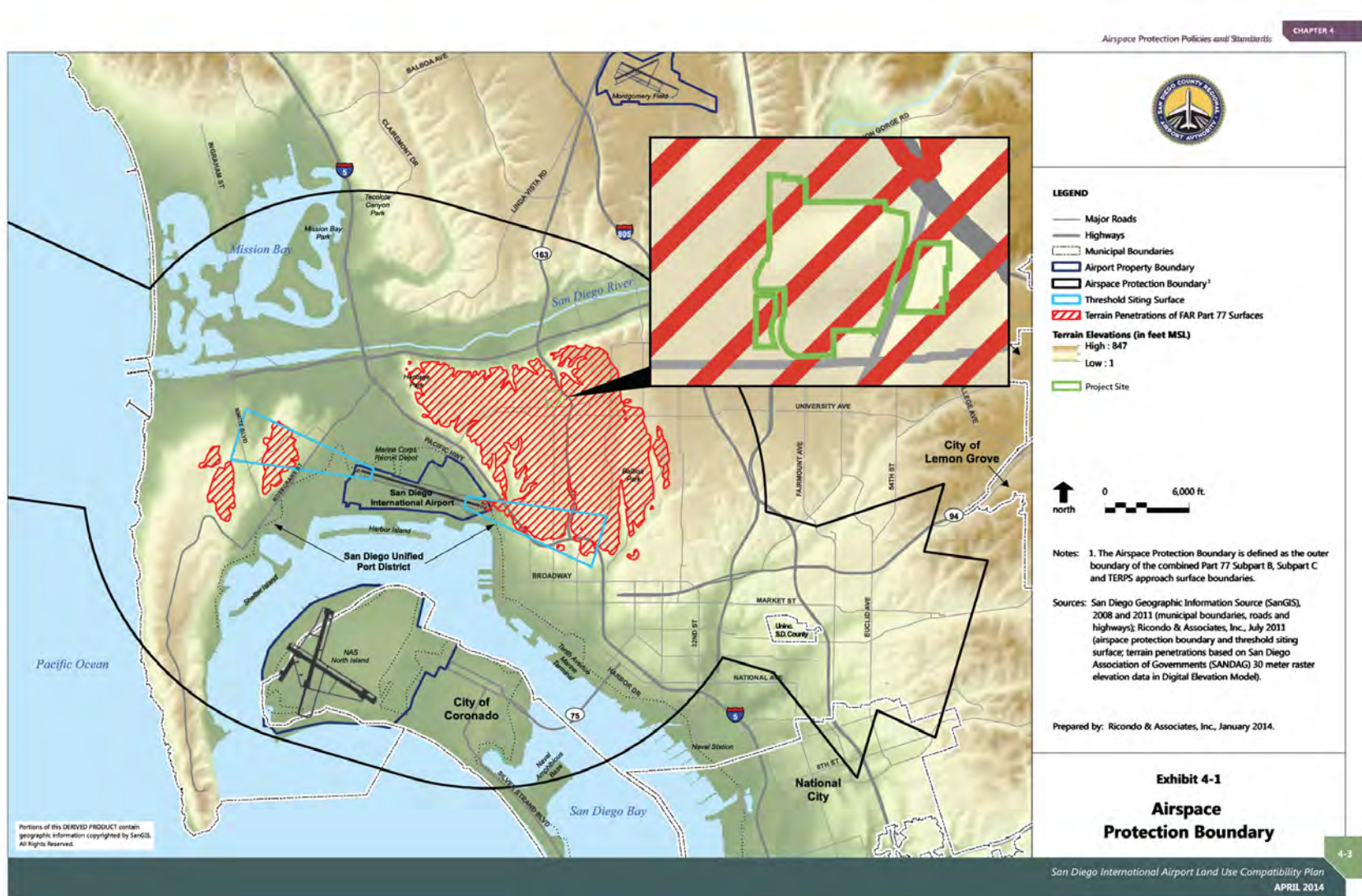


Figure 5.1-1. SDIA Airspace Protection Boundary

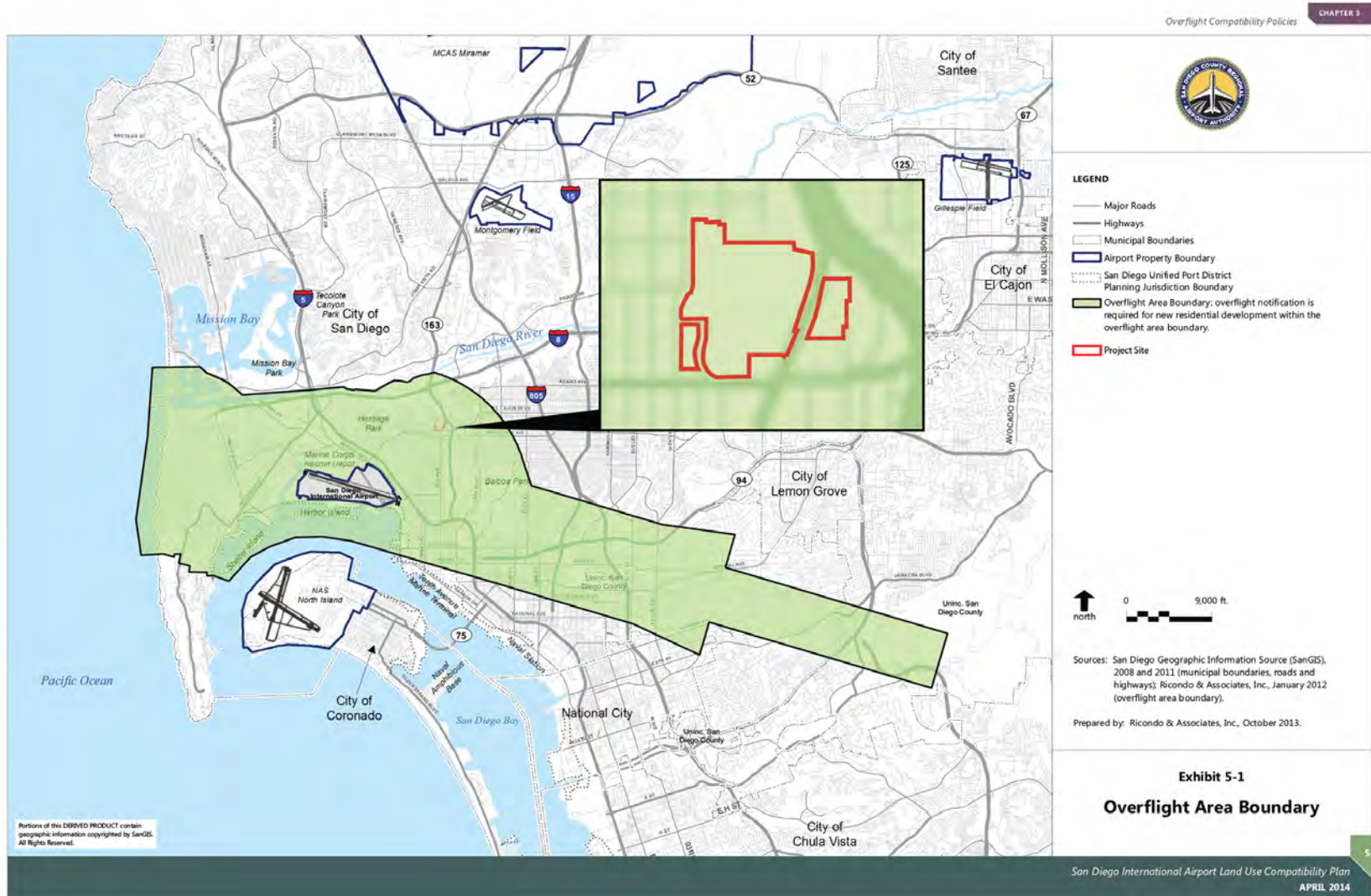


Figure 5.1-2. SDIA Overflight Area Boundary

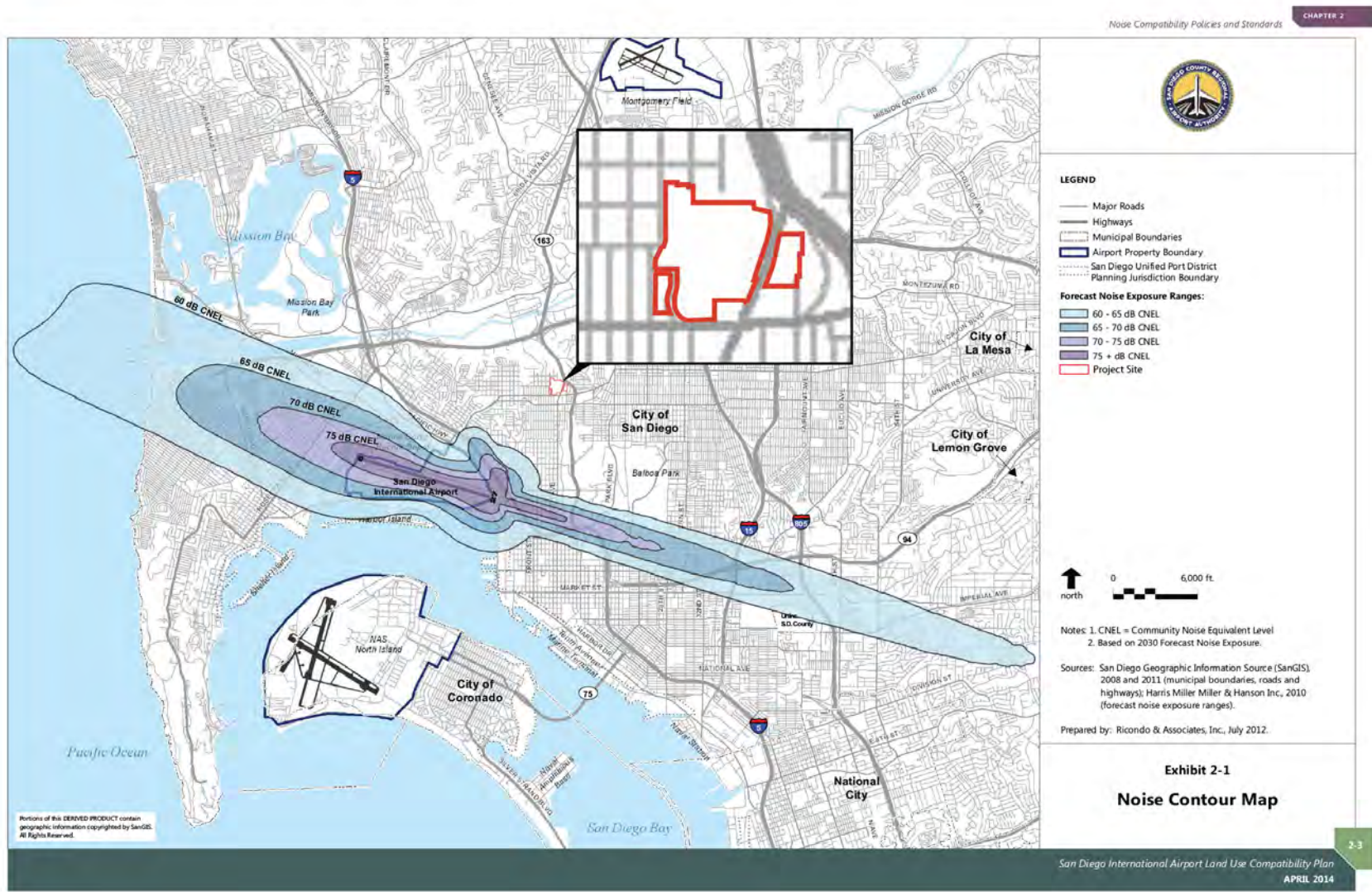


Figure 5.1-3. SDIA Noise Contour Map

5.2 Transportation and Circulation

This section evaluates potential transportation impacts associated with the project using a Vehicle Miles Traveled (VMT) metric, pursuant to guidance from the Governor's Office of Planning and Research (OPR) in December 2018 (Technical Advisory on Evaluating Transportation Impacts in CEQA). The following discussion is based on the *Transportation Impact Analysis* (TIA), prepared by Linscott, Law, and Greenspan Engineers (LLG), dated July 2022. The project also evaluated potential transportation effects on the mobility network in a *Local Mobility Analysis* (LMA), also prepared by LLG, dated June 2022. The TIA and LMA were prepared based on the City of San Diego Transportation Study Manual (TSM), dated September 29, 2020, and are included as Appendices D and I, respectively.

5.2.1 Existing Conditions

The project site encompasses approximately 21.07 acres and is currently developed with the Scripps Mercy Hospital Campus buildings, surface and structured parking, internal streets and driveways, and landscaping. Scripps Mercy Hospital operates under an existing CUP (CUP No. 304755). The project site is situated in the developed neighborhood of Hillcrest within the Uptown Community of the City of San Diego. The project site abuts Washington Street to the north and Fourth Avenue to the west and has frontage on the east and west sides on Sixth Avenue. Regional access to the site is provided by SR 163, located immediately east of the project site. Local access to the site is via Washington Street, Fifth Avenue, Sixth Avenue, Lewis Street, and Fourth Avenue.

5.2.1.1 Roadway Network

The primary roadway network serving the project site includes SR 163, Washington Street, University Avenue, Fourth Avenue, Fifth Avenue, and Sixth Avenue. These existing roadways are described below.

State Route 163

SR 163 is a north-south State Route and generally consists of four travel lanes (north of University Avenue) and two travel lanes (south of University Avenue) in each direction. It has a posted speed limit of 55 miles per hour (mph). SR 163 is contained within the San Diego metropolitan area between Downtown San Diego and I-805. SR 163 can be directly accessed from the Uptown community to and from Sixth Avenue and provides connections with I-8 and I-5 within the vicinity of the project site. The closest off-ramp for southbound SR 163 exists into the intersection of Washington Street and Eighth Avenue.

Washington Street

Washington Street functions as an east-west four-lane Major between I-5 and Richmond Street. Washington Street is currently grade-separated as an overcrossing over Sixth Avenue. It is currently

functioning as a four-lane Major Arterial with a raised median. Its ultimate classification is a four-lane Major with Class II buffered bicycle lanes per the Uptown Community Plan. Parallel parking is permitted intermittently within the area. The posted speed limit is 35 mph. No bike lanes are currently provided.

University Avenue

University Avenue functions as an east-west two-lane Collector between Fourth Avenue and Fifth Avenue, as a four-lane Collector between Fifth Avenue and Sixth Avenue, and a four-lane Collector east of Sixth Avenue. It is currently functioning at its adopted Community Plan ultimate classification. University Avenue includes sidewalks and curbs on both sides of the street. Parallel parking is permitted between Fifth Avenue and Sixth Avenue. The posted speed limit is 25 mph. A Class III bike route marked with “sharrows” is currently provided between Fourth Avenue and Fifth Avenue, and a Class II bike lane is currently provided on both sides between Fifth Avenue and Sixth Avenue.

Fourth Avenue

Fourth Avenue functions as a north-south one-way southbound two-lane Collector south of Washington Street, and a two-way, two-lane Collector north of Washington Street. It is currently built to its ultimate Community Plan roadway classification. Fourth Avenue includes sidewalks and curbs with parallel parking permitted on both sides of the street. The posted speed limit ranges from 25 to 30 mph.

Fifth Avenue

Fifth Avenue functions as a one-way northbound three-lane Collector south of Washington Street. It is currently built to its ultimate Community Plan roadway classification. Fifth Avenue includes sidewalks and curbs with parallel parking permitted on both sides of the street. The posted speed limit ranges from 25 to 30 mph. A buffered Class II bike lane is currently provided on the west side of Fifth Avenue.

Sixth Avenue

Sixth Avenue is unclassified in the Uptown Community Plan Circulation Element within the study area. It is currently built as a three-lane roadway (two southbound lanes and one northbound lane) between SR 163 and University Avenue. Sidewalks and bike lanes are not provided, as this segment leads to and from SR 163 where pedestrians and cyclists are prohibited. Curbside parking is not permitted, and the posted speed limit is 40 mph in the northbound direction north of Washington Street.

5.2.1.2 Bicycle Network

Bicycle facilities can typically be classified into four general categories:

- Class I refers to exclusive bike paths, also termed shared-use or multi-use paths, for exclusive use by bicyclists, pedestrians, and those using non-motorized modes of travel.

They are physically separated from vehicular traffic and can be constructed in roadway right-of-way or exclusive right-of-way. Bike paths provide critical connections where roadways are absent or are not conducive to bicycle travel.

- Class II refers to bicycle lanes defined by pavement striping and signage used to allocate a portion of roadway for bicycle travel. Bike lanes are one-way facilities on either side of a roadway. A painted buffer can separate bikes from vehicles or parking lanes. Green paint can identify conflict zones.
- Class III refers to bike routes that share use with motor vehicle traffic within the same travel lane. Bike routes are identified with signage and street markings known as “sharrows” or shared lane markings to delineate that the road is a shared-use facility.
- Class IV refers to a Cycle Track, which is a hybrid type bicycle facility that combines the experience of a separated path with the on-street infrastructure of a conventional bike lane. Cycle tracks are bikeways located in roadway right-of-way but separated from vehicle lanes by physical barriers, flexible posts, on-street parking curbs, or other objects. Cycle tracks provide for one-way or two-way bicycle travel and are exclusively for bicycle use.

The project site is well-served by bicycle facilities. Table 5.2-1, *Bicycle Facilities*, summarizes the existing bicycle classifications on the project’s surrounding street segments and also shows the future bicycle classifications planned for those facilities. Figure 5.2-1, *Existing Bicycle Network*, presents the existing bicycle network within the immediate vicinity of the project site. As presented in Table 5.2-1 and shown in Figure 5.2-1, bicycle facilities within a one-half mile radius of the project site include Class II Bike Lanes and Class III Bike Routes.

5.2.1.3 Pedestrian Network

The project site in generally has good pedestrian accessibility and connectivity to the surrounding community. Figure 5.2-2, *Existing Pedestrian Network*, shows the existing pedestrian network within the immediate vicinity of the project site. As shown in Figure 5.2-2, the project vicinity is generally unrestricted and contains pedestrian pathways around the project site. Pedestrian barriers exist along the streets surrounding SR 163 and around various open space areas. Pedestrian crossings, missing sidewalks, and two existing pedestrian bridges are identified on Figure 5.2-2, as well.

5.2.1.4 Transit

The existing public transit network within the project vicinity consists of bus service provided by the MTS. The bus routes serving the immediate project area include MTS Routes 1, 3, 10, 11, and 120. See Figure 5.2-3, *Existing Transit Network*, for the existing transit network within the project vicinity.

Route 1 runs between Fashion Valley (Fashion Valley Transit Center) and La Mesa (La Mesa Boulevard Trolley Station). This route runs along University Avenue, and El Cajon Boulevard to La Mesa. There are a total of 50 stops along this route. Weekday service begins at 4:46 a.m. with 15-minute headways throughout the day, and ends at 12:14 a.m. Saturday service begins at 5:22 a.m.

with 30-minute headways, and ends at 12:14 a.m. Sunday service begins at 5:39 a.m. with 30-minute headways, and ends at 9:10 a.m.

Route 3 runs between Lincoln Park (Euclid Avenue Transit Center) and Hillcrest (UCSD Medical Center). The route runs along 5th Avenue, and University Avenue to Hillcrest. There are a total of 54 stops along this route. Weekday service begins at 4:40 a.m. with 12-minute headways until 7:30 p.m. and 30-minute headways after 7:30 p.m., and ends at 12:16 a.m. Saturday service begins at 5:27 a.m. with 20-minute headways, and ends at 12:15 a.m. Sunday service begins at 5:57 a.m. with 30-minute headways and ends at 9:06 p.m.

Route 10 runs between Old Town (Old Town Transit Center) and City Heights (University Avenue and College Avenue). This route runs along Washington Street, and University Avenue to City Heights. There are a total of 25 stops along this route. Weekday service begins at 4:42 a.m. with 15-minute headways until 9:00 p.m. and 30-minute headways after 9:00 p.m., and ends at 12:24 a.m. Saturday service begins at 5:08 a.m. with 20-minute headways and ends at 12:20 a.m. Sunday service begins at 5:22 a.m. with 30-minute headways, and ends at 10:29 p.m.

Route 11 runs between SDSU (SDSU Transit Center) and Downtown (Front Street & Broadway). This route runs along Adams Avenue, University Avenue, and Front Street to Downtown. There are a total of 47 stops along this route. Weekday service begins at 4:37 a.m. with 15-minute headways until 6:20 P.M. and 30-minute headways after 6:20 p.m., and ends at 11:06 p.m. Saturday service begins at 5:37 a.m. with 30-minute headways, and ends at 10:37 p.m. Sunday service begins at 6:20 a.m. with 30-minute headways, and ends at 8:42 p.m.

Route 120 runs between Downtown (4th Avenue & Broadway) and Kearny Mesa (Kearny Mesa Transit Center). This route runs along Broadway, 5th Avenue, and University Avenue to Kearny Mesa. There are a total of 32 stops along this route. Weekday service begins at 4:59 a.m. with 15-minute headways until 6:00 p.m. and 30-minute headways after 6:00 p.m., and ends at 11:54 p.m. Saturday service begins at 5:43 a.m. with 30-minute headways, and ends at 10:33 p.m. Sunday service begins at 6:12 a.m. with 30-minute headways and ends at 9:59 p.m.

5.2.2 Regulatory Framework

5.2.2.1 State

Senate Bill 743/State CEQA Guidelines

SB 743, signed in 2013, required a change in the way that transportation impacts are analyzed under CEQA. Historically, environmental review of transportation impacts has focused on the delay vehicles experience at intersections and roadway segments, as expressed in LOS. The legislation, however, sets forth that upon certification of new guidelines by the Secretary of the Natural Resources Agency, automobile delay, as described solely by LOS or other similar measures of traffic congestion shall not be considered a significant impact on the environment. Local jurisdictions may

continue to consider LOS with regard to local general plan policies, zoning codes, conditions of approval, thresholds, and other planning requirements. New criteria for measuring traffic impacts under CEQA are to focus on the reduction of greenhouse gas emissions, the development of multi-modal transportation networks, and a diversity of land uses.

State CEQA Guidelines Section 15064.3 was adopted in December 2018 to implement SB 743, establishing VMT as the most appropriate measure of transportation impacts and shifting away from Level of Service (LOS). By doing so, Section 15064.3:

- Reiterates that a project's adverse effect on automobile delay shall not constitute a significant environmental impact, and
- A lead agency has discretion to choose the most appropriate methodology to evaluate a project's potential transportation VMT significant impact, including whether to express the change in per employee, per capita, per household, or in any other measure.

Lead agencies are required to comply with CEQA Guideline revisions no later than July 1, 2020. To assist lead agencies in this endeavor, the OPR published a *Technical Advisory on Evaluating Transportation Impacts in CEQA* (December 2018), which provided guidance in the calculation and application of VMT analyses within CEQA documents. To comply with CEQA, the City prepared a TSM (September 29, 2020) that was adopted by City Council on November 9, 2020 as part of the Complete Communities: Mobility Choices program.

5.2.2.2 Regional

SANDAG San Diego Forward: The Regional Plan

San Diego Forward: The Regional Plan (Regional Plan) is an update of the Regional Comprehensive Plan (RCP) for the San Diego Region and the 2050 RP/Sustainable Communities Strategy (SCS), combined into one document. The Regional Plan provides a blueprint for San Diego's regional transportation system in order to effectively serve existing and projected workers and residents within the San Diego region. In addition to long-term projections, the Regional Plan includes an SCS, in compliance with SB 375. The SCS aims to create sustainable, mixed-use communities conducive to public transit, walking, and biking by focusing future growth in the previously developed, western portion of the region along the major existing transit and transportation corridors. The current 2021 Regional Plan has a horizon year of 2050, projects regional growth, and contains recommended transportation projects over this time period.

Congestion Management Program (CMP)

State Proposition 111, passed by voters in 1990, established a requirement that urbanized areas prepare and regularly update a CMP, which is a part of SANDAG's RTP. The purpose of the CMP is to monitor the performance of the region's transportation system, develop programs to address near-term and long-term congestion, and better integrate transportation and land use planning. SANDAG provided regular updates to the State CMP from 1991 through 2008. In October 2009, the San Diego

region elected to be exempt from the State CMP and, since this decision, SANDAG has been abiding by 23 CFR 450.320 to ensure the region's continued compliance with the federal congestion management process. San Diego Forward: The Regional Plan, the region's long-range transportation plan and SCS, meets the requirements of 23 CFR 450.320 by incorporating the following federal congestion management process: performance monitoring and measurement of the regional transportation system, multimodal alternatives and non single-occupancy vehicle (SOV) analysis, land use impact analysis, the provision of congestion management tools, and integration with the RTIP process.

SANDAG Regional Bike Plan

The SANDAG Regional Bike Plan, *Riding to 2050*, provides a regional strategy to make riding a bike a useful form of transportation for everyday travel. The plan will help San Diego meet its goals to reduce GHG emissions and improve mobility. Goals of the Regional Bike Plan include increasing levels of bicycling; improving bicycling safety; encouraging Complete Streets; supporting reductions in emissions; and increasing community support. In September 2013, the SANDAG Board of Directors approved funding to implement the Regional Bike Plan Early Action Program, which focuses on the region's highest-priority projects. Priority is chosen in part based on proximity to smart growth areas, taking into account that bikeways would be used more often if they connect high-density activity hubs within a short distance of each other, and on whether a project would fill key gaps in the regional bike networks.

5.2.2.3 Local

City of San Diego General Plan

The General Plan's Mobility Element identifies the proposed transportation network and strategies needed to support the anticipated General Plan land uses. The Mobility Element's policies promote a balanced, multi-modal transportation network that gets people where they want to go while minimizing environmental and neighborhood impacts. The Mobility Element contains policies that address walking, streets, transit, regional collaboration, bicycling, parking, the movement of goods, and other components of a transportation system. Together, these policies advance a strategy for relieving congestion and increasing transportation choices.

City of San Diego Bicycle Master Plan

The 2013 City of San Diego Bicycle Master Plan, which updates the City's 2002 plan, presents a bicycle network, projects, policies, and programs for improving bicycling through 2030 and beyond, consistent with the City's 2008 General Plan mobility, sustainability, health, economic, and social goals. The goals of the Bicycle Master Plan are to create: a city where bicycling is a viable travel choice, particularly for trips of less than five miles; a safe and comprehensive local and regional bikeway network; and environmental quality, public health, recreation and mobility benefits through increased bicycling. These goals are supported by twelve key policies to help bicycling become a more viable transportation mode for trips of less than five miles, to connect to transit, and for recreation. The Bicycle Master Plan addresses existing bicycling conditions, the relationship of the

Plan to other plans and policies, a bicycle needs analysis, bicycle facility recommendations, bicycle program recommendations, and implementation and funding issues.

City of San Diego Pedestrian Master Plan

The City of San Diego is developed a Pedestrian Master Plan (2006) to guide the planning and implementation of pedestrian improvement projects in the City. The Master Plan will help the City enhance neighborhood quality and mobility options by facilitating pedestrian improvement projects and will identify and prioritize improvement projects based on technical analysis and community input, as well as improve the City's ability to receive grant funding for implementation of pedestrian projects. , The City developed the Master Plan Citywide Framework Report, which provides a foundation for identifying and prioritizing projects in each community and inventoried communities in the city to understand pedestrian needs, identify problems, and create a prioritized list of pedestrian projects specific to each community.

5.2.3 Methodology

5.2.3.1 Background on Senate Bill 743

In conformance with SB 743, the project's transportation impacts were evaluated using a VMT metric, pursuant to the latest direction from the OPR Technical Advisory, and consistent with the City's Transportation Study Manual adopted by City Council in November 2020. Public Resources Code Section 21099, enacted pursuant to SB 743, identifies VMT as an appropriate metric for measuring transportation impacts along with the elimination of auto delay/LOS for CEQA purposes statewide prior to July 1, 2020. The justification for this paradigm shift is that auto delay/LOS impacts may lead to improvements that increase roadway capacity and, therefore, sometimes induce more traffic and greenhouse gas emissions. In contrast, constructing projects in VMT-efficient locations assists California in meeting GHG emissions targets.

In January 2016, the OPR issued Draft Guidance, which provided recommendations for updating the State's CEQA Guidelines in response to SB 743 and recommended options for conducting VMT analysis. When using a threshold of significance, a lead agency may "consider the thresholds of significance recommended by experts and supported by substantial evidence" (CEQA Guidelines 15064.7(c)). In addition, lead agencies may use thresholds on a project-by-project or a case-by-case basis not for general use where, based on careful judgment, project setting, and to the extent possible on scientific and factual data, the lead agency explains how compliance with the threshold means that the project's impacts are less than significant.

The TSM was published by the City of San Diego on September 29, 2020, pursuant to the most current guidance from OPR in December 2018.

5.2.3.2 Significance Criteria

As the City of San Diego has developed significance thresholds and technical methodologies, the TSM (September 2020) was utilized to perform a Project-Specific VMT Analysis.

According to the TSM, a project that meets at least one of the following screening criteria would be presumed to have a less than significant VMT impact due to the project characteristics and/or location:

- 1. Resident or Commercial Project Located in a VMT-Efficient Area:** The project is a residential or commercial employment project located in a VMT-efficient area (15 percent or more below the regional average household VMT/capita or VMT/employee) based on the applicable location-based screening map produced by SANDAG.
- 2. Industrial Project Located in a VMT-Efficient Area:** The project is an industrial employment project located in a VMT-efficient area (in an area with average or below average base year VMT/employee) based on the applicable location-based screening map produced by SANDAG.
- 3. Small Project:** The project is a small project defined as generating less than 300 daily unadjusted driveway trips using the City of San Diego trip generation rates/procedures.
- 4. Locally Serving Retail/Recreational Project:** The project is a locally serving retail/recreational project defined as having 100,000 square feet gross floor area or less **and** demonstrates through a market area study that the market capture area for the project is approximately three miles (or less) and serves a population of roughly 25,000 people or less. Locally serving retail is consistent with the definitions of Neighborhood Shopping Center in the SDMC LDC Trip Generation Manual. Locally serving recreation is consistent with the land uses listed in Appendix B of the draft TSM, given that it meets the square footage and market capture area above. Adding retail/recreation square footage (even if it is 100,000 square feet gross floor area or less) to an existing regional retail shopping area is **not** screened out.
- 5. Locally Serving Public Facility:** The project is a locally serving public facility defined as a public facility that serves the surrounding community or a public facility that is a passive use. The following are considered locally serving public facilities: transit centers, public schools, libraries, post offices, park-and-ride lots, police and fire facilities, and government offices. Passive public uses include communication and utility buildings, water sanitation, and waste management.
- 6. Affordable housing:** The project has access to transit and is wholly or has a portion that meets one of the following criteria: is affordable to persons with a household income equal to or less than 50 percent of the area median income (as defined by California Health and Safety Code Section 50093), housing for senior citizens, housing for transitional foster youth, disabled veterans, or homeless persons. The units shall remain deed restricted for a period of at least 55 years. The project shall provide no more than the minimum amount of parking

per unit, per SDMC Section 143.0744. Only the portion of the project that meets the above criteria is screened out.

- 7. Mixed-Use Project Screening Considerations:** The project's individual land uses should be compared to the screening criteria above. It is possible for some of the mixed-use project's land uses to be screened out and some to require further analysis. For purposes of applying the small project screening criteria, the applicant would only include the trip generation for portions of the project that are not screened out based on other screening criteria.
- 8. Redevelopment Project Screening Considerations:** The project is a redevelopment project that demonstrates that the project's total VMT is less than the existing land use's total VMT. Exception: if a project replaces affordable housing with a smaller number of moderate-income or high-income residential units, the project is not screened out and must analyze VMT impacts.

If a project is not screened out based on the above, additional criteria is used to determine the methodology for completing a VMT analysis. Per the TSM, transportation VMT analysis for CEQA shall be conducted using SANDAG Regional Travel Demand Model, which provides base year VMT data. By utilizing the SANDAG screening maps, the Resident VMT per Capita and Employee VMT per Employee can be estimated. Definitions of these metrics are described below per the TSM:

Resident VMT per Capita: Includes all vehicle-based resident trips grouped and summed to the home location of individuals on the trip. It includes all trips: home-based and non-home-based trips. The VMT for each home is then summed for all homes in a particular census tract and divided by the population of that census tract to arrive at Resident VMT per Capita.

Employee VMT per Employee: Includes all vehicle-based employee trips grouped and summed to the work location of individuals on the trip. This includes all trips, not just work-related trips. The VMT for each work location is then summed for all work locations in a particular census tract and divided by the number of employees of that census tract to arrive at employee VMT per employee.

Table 5.2-2, *VMT Significance Thresholds*, shows the City's transportation VMT thresholds of significance according to the City's TSM. Table 5.2-3, *Transportation VMT Analysis Methodology by Land Use*, further details the SANDAG methodology applicable to the project's land use per the TSM.

Based on the project's Institutional land use, the project's VMT would be evaluated as a Commercial Employment project. According to the screening criteria described above, the project does not screen out from a VMT analysis, as summarized by Table 5.2-4, *VMT Screening Criteria – Project Applicability*. The Employee VMT per Employee for Census Tract 4 (Series 14 ABM2+) is shown as 17.3 and the regional average is 18.9, thus the project has a VMT that is approximately 91.5 percent of the regional average. Using this data the project does not screen out from a VMT analysis. Therefore, a project specific VMT analysis was required and conducted for the project. Project impacts relative to VMT are analyzed in Section 5.2.4.2, under Issue 2 below.

5.2.3.3 Trip Generation

The Scripps Mercy Hospital Campus Project proposes the demolition of several existing buildings and construction of new buildings on the Scripps Mercy Hospital Campus site in two phases. Two project phases are assumed for the purposes of the analysis – Opening Day (Phase I) in Year 2030 and Phase II (Project Buildout) in Year 2035. Phase I consists of the following trip-generating land use changes:

Demolition

- Behavioral Health Clinic (50 beds) (64,341sf)
- Hospital Building (517 beds) (507,580 sf)
- 550 Washington Medical Office (73,448 sf)

Construction

- Hospital I (351 beds) (631,000 sf)
- Medical Office Building (200,000 sf)

Phase II (Project Buildout) consists of the following additional trip-generating land use changes:

Construction

- Hospital II (166 beds) (380,000 sf)

The trip generation rates for the project were based on the *City of San Diego Trip Generation Manual, May 2003*. Transit and mixed-use trip credits were also applied. For Phase I (Year 2030 Opening Day), the project is estimated to generate less traffic than the existing baseline (Year 2019) due to existing traffic credit commensurate with the reduction in the number of hospital beds and the demolition of the 550 Washington Street building, as well as the Behavioral Health Clinic. For Phase II (Year 2035), the project is estimated to generate approximately 1,490 net new Average Daily Traffic (ADT) with 74 AM peak hour trips (61 in, 13 out) and 129 \PM peak hour trips (38 in, 91 out).

5.2.4 Impact Analysis

5.2.4.1 Issue 1

Issue 1: Would the project conflict with an adopted program, plan, ordinance, or policy addressing the transportation system, including transit, roadways, bicycle, and pedestrian facilities?

Impact Threshold

According to the City's Thresholds, transportation impacts may be significant if a project would conflict with adopted policies, plans, or programs supporting alternative transportation modes (e.g., bus turnouts, bicycle racks). A significant transportation impact could occur if the proposed project

would conflict with the General Plan Mobility Element or other adopted transportation programs, plans, ordinances, or policies, such as the City's Bicycle Master Plan.

Analysis

The project would be consistent with the Mobility Element of the General Plan (as previously demonstrated in Table 5.1-1) and other adopted policies, plans (including the Uptown Community Plan, as previously demonstrated in Table 5.1-3), or programs supporting the transportation system, as it strives to improve mobility through a balanced, multi-modal transportation network with planned improvements to pedestrian, bicycle, and transit facilities.

Alternative Transportation Improvements

Pedestrian Mobility

A walkshed analysis was performed to evaluate the pedestrian connectivity in the vicinity of the Project site and to ensure the Project provides the appropriate pedestrian facilities. The walkshed analysis was performed by identifying all access points to/from the project considering topography constraints. From each access point, areas outside the project site that could be reached by walking 0.5-mile were identified. Selected walking routes from each access point consider the existence of crosswalks, pedestrian bridges, etc. In this regard, while some areas are located within the 0.5-mile radius around the project site, they may not be reached by walking due to lack of facilities. After creating the walkshed network, the area that could be captured by walking was measured. A larger walkshed area (walkshed network) means higher connectivity between the project site and nearby areas. The Project in general has good connectivity to the surrounding community.

Pedestrian Improvements

The project would construct the following improvements on the fronting streets:

- As part of implementing the ultimate classification of Washington Street as a Major Arterial, the project would provide half-width improvements to Washington Street to include a 14-foot-wide parkway with contiguous sidewalk that along the project frontage on the north side of Washington Street fronting the HSB.
- On the east side of Fifth Avenue between Fifth Avenue and Washington Street, the project proposes to construct a 10-foot-wide parkway with a five-foot wide landscape buffer and a five-foot wide non-contiguous sidewalk.
- On the north side of Fifth Avenue between Fourth Avenue and Fifth Avenue, the project proposes to construct a 10-foot-wide parkway with a five-foot wide contiguous sidewalk and a five-foot wide landscape buffer.
- On the east side of Fourth Avenue between Lewis Street and Fifth Avenue, the project proposes to construct a 14-foot-wide parkway, which will include an eight-foot wide landscape buffer and six-foot wide non-contiguous sidewalk.

- On the east side of Fourth Avenue between Lewis Street and the MOB frontage, the project would construct a 14-foot-wide parkway, which would include an eight-foot wide landscape buffer and six-foot wide non-contiguous sidewalk

Previously, a pedestrian bridge existed over Sixth Avenue that connected the existing employee surface parking lot to the existing Behavioral Health Unit surface parking lot. As a part of the approved Scripps Sixth Avenue Parking Structure project (PTS#645493), the existing pedestrian bridge has been demolished and a new pedestrian bridge will be constructed to connect the parking structure directly to Hospital I.

All proposed pedestrian design and mobility elements, including sidewalks and pathways, linkages, crossings and intersections, and curb pop-outs or extensions would be required to comply with the City's design standards, satisfactory to the City Engineer.

The project also includes pedestrian connections within the site with walkways, paths, and sidewalks to facilitate pedestrian circulation. Additionally, the project would provide an 11-foot pedestrian path north of the Emergency Department parking lot that would provide new pedestrian access from Lewis Street to Fifth Avenue, as well as connect Hospital I and Hospital II. (See Figure 3-8 *Scripps Mercy Hospital Campus Accessibility Plan*.)

Bicycle Mobility

A bikeshed analysis was conducted to evaluate bicycle connectivity in the vicinity of the project site. This analysis also identifies potential locations where providing bicycle access could improve project connectivity to surrounding area. The bikeshed analysis was performed by identifying all access points to/from the project. From each access point, areas outside the project site that could be reached by biking 0.5 mile were identified. Selected biking routes from each access point consider the presence of bike routes, lanes, dedicated pathways, and bicycle/pedestrian bridges. In this regard, while some areas are located within the 0.5-mile buffer around the project site, they may not be reached by bike due to lack of facilities. A larger bikeshed area (bikeshed network) means higher connectivity between the project site and nearby areas.

Bicycle Improvements

To promote bicycle mobility, the project proposes to construct several bicycle improvements. Improvements to the bicycle network are described below:

- The project would construct half-width improvements along its Washington Street frontage to implement the ultimate classification of a four-lane Major with buffered Class II bicycle lanes per the Uptown Community Plan. As part of this improvement, the project would stripe a buffered bike lane on the north side of Washington Street along the project frontage.
- The project proposes to stripe shared lane markings to delineate a Class III Bike lane on Fifth Avenue between Fourth Avenue and Washington Street, and Fourth Avenue between Lewis Street and Fifth Avenue.

- As part of providing bicycle amenities within the project site, the project proposes to add ten showers and over 420 lockers. The project would also meet or exceed the City of San Diego CAP and SDMC requirements for bicycle parking spaces.

Transit Access

The following transit improvements, categorized as Project Design Features and TDM measures would be provided by the project. The Project Design Features are in addition to the TDM measures that are required as a part of the City of San Diego CAP checklist:

- The project would upgrade the existing bus stop on Washington Street and Fifth Avenue (Stop ID 11243). The project would add a shelter and maps/wayfinding signs.
- The project would provide transit information in the hospital and MOB lobbies.
- The project would provide a 30 percent subsidy (which is approximately \$1 per day per employee for the current monthly pass of \$72) towards transit passes for MTS Bus, Trolley or COASTER trains for employees to promote transit usage. Additionally, the project would allow transit passes to be purchased on a pre-tax basis through convenient payroll deduction.

Consistency with Adopted Alternative Transportation Mode Plans and Policies

Alternative transportation mode plans and policies in the vicinity of the project are governed by the City's General Plan and SANDAG's Regional Plan. Specifically, the project would be consistent with the City's Mobility Element, which supports multi-modal transportation, and the Urban Design Element, which supports integrating transit facilities into project design, and improvements to walkability, bicycling, and transit integration. Refer to Section 5.1, *Land Use*, of this EIR and Table 5.1-1 for details on General Plan consistency.

General Plan Mobility Element

The purpose of the General Plan Mobility Element is to improve mobility through development of a balanced, multi-modal transportation network. The project would increase safety and comfort for pedestrians by providing contiguous and non-contiguous sidewalks with landscaping to ensure accessibility to pedestrians of all abilities. The project's Local Mobility Assessment (LLG 2021) includes a TDM Program. This includes such measures as flexible or alternative work hours, transit improvements, provision of a carpool program with designated preferred carpool parking spaces, and telecommuting as well as participation in SANDAG's iCommute Program. The project site supports alternative transportation modes, emphasizes pedestrian accessibility, and provides bicycle facilities. See Table 5.1-1, *City of San Diego General Plan Consistency*, for details on the project's consistency with the General Plan Mobility Element's goals and policies.

Uptown Community Plan Mobility Element

The Uptown Community Plan Mobility Element includes policies that encourage safe and efficient pedestrian and bicycle friendly facilities. The project includes enhanced pedestrian connections including new non-contiguous sidewalks and plaza elements to create a comfortable pedestrian

experience. Bicycle parking would be provided within the project, as well as showers and lockers to serve cyclists. The project would encourage the use of public transportation through signs and the addition of a bus shelter at the existing bus stop on Washington Street. Electric vehicle charging stations would also be integrated into the project's parking, which would be primarily structured parking integrated into new building development. See Table 5.1-2, *Uptown Community Plan Consistency*, for details on the project's consistency with the Uptown Community Plan Mobility Element's goals and policies.

Significance of Impacts

The project would be consistent with the Mobility Element of the General Plan and other adopted policies, plans (including the Uptown Community Plan), and programs supporting the transportation system, including pedestrian and bicycle facilities. The project design includes improvements that would enhance existing transit, bicycle, and pedestrian transportation modes on the site. All transportation facilities would be designed in accordance with applicable City and MTS standards. As a result, the project would not conflict with any adopted program, plan, ordinance, or policy addressing the transportation system. No significant impacts would occur.

5.2.4.2 Issue 2

Issue 2: Would the project result in Vehicle Miles Traveled (VMT) exceeding thresholds identified in the City of San Diego Transportation Study Manual?

Impact Threshold

According to the TSM, a project that meets at least one of the following screening criteria would be presumed to have a less than significant VMT impact due to the project characteristics and/or location (see Section 5.2.3.2 for a detailed description of each screening criteria):

1. Resident or Commercial Project Located in a VMT-Efficient Area
2. Industrial Project Located in a VMT-Efficient Area
3. Small Project
4. Locally Serving Retail/Recreational Project
5. Locally Serving Public Facility
6. Affordable housing
7. Mixed-Use Project Screening Considerations
8. Redevelopment Project Screening Considerations

Projects that do not meet the above screening criteria must include a detailed evaluation of the VMT produced by the project. The significance thresholds and specific VMT metric used to measure VMT are described by land use type in Table 5.2-2, *VMT Significance Thresholds*.

Based on the project's Institutional land use designation, the project's VMT would be evaluated as a Commercial Employment project. The Transportation VMT significance threshold for commercial employment projects is 15 percent below regional average employee VMT/Employee.

Analysis

As described in Table 5.2-4, none of the screening criteria apply to the project with the exception of "Residential or Commercial Project Located in a VMT Efficient Area." The proposed project is considered a commercial employment project for VMT evaluation purposes. Pursuant to the SANDAG screening map (Series 14 ABM2+, Base Year 2016), the Employee VMT per Employee is shown as 16.1 for Year 2025 (which is the closest year to the project Opening Day) for Census Tract 4 in which the project is located, and the regional average is 18.9. The project site has a VMT that is approximately 85.1 percent of the regional average. Therefore, because the project site's Employee VMT per Employee is greater than 15 percent below the regional average employee VMT per Employee, the project does not screen out from a VMT analysis. A VMT analysis was conducted to determine the project's employee VMT per employee in relation to the Regional Average VMT/Employee.

A Project-Specific VMT analysis was conducted to account for the project design features that are expected to reduce the project's VMT per employee. These project design features incorporate TDM measures, which are also a requirement of the City of San Diego's Climate Action Plan for the project. The TDM measures can be broadly categorized as Trip Reduction and Telecommuting measures. The Trip Reduction measures include a transit subsidy program (30 percent, which is approximately \$1 per day per employee for the current monthly pass of \$72) towards purchase of transit passes; carpool program for employees; a \$30.00 per month subsidy for employees to use vanpools; maintaining an employer network in the SANDAG iCommute program; and promote its Ridematcher service to its employees. The Telecommuting measures include offering virtual doctor and urgent care visits to patients; flexible and alternative work hours for employees; and offering employees of Scripps Health "work at home" options via Telecommuting, Telemedicine, Clinical Documentation Integrity Specialist (CDIS), or other approved programs to work remotely for one or more days per week. In addition to the CAP required TDM measures, the project design features would also include pedestrian network improvements along the project frontage streets of Washington Street, Fourth Avenue and Fifth Avenue, and provision of long-term and short-term bicycle parking, showers, and lockers per the CAP checklist.

Specifically, using the California Air Pollution Control Officers Association (CAPCOA) methodology presented in the TSM, and in Table 5-2 of the TIA (Appendix D), a 2.86 percent reduction in VMT per employee would be achieved for the project given the project's commitment to implementing the above project design features and TDM measures in Phase I. With this reduction of 2.86 percent, the VMT per employee would equate to less than 85 percent ($85.18 \text{ minus } 2.86 = 82.32$) of the regional average VMT per employee and result in a less than significant transportation VMT impact. Therefore, given that a less than significant VMT impact is identified in Project Phase 1 (Year 2030), no mitigation measures are required.

At project buildout in 2035, the project is expected to generate approximately 6,086 driveway ADT with 350 total (281 inbound/69 outbound) driveway trips during the AM hour and 589 total (176 inbound/413 outbound) driveway trips during the PM peak hour. When existing ADT is taken into account, the project results in 1,490 net new ADT with 74 total (61 inbound/13 outbound) net new trips during the AM peak hour and 129 total (38 inbound/91 outbound) net new trips during the PM peak hour. As discussed above and outlined in Table 5.2-3, the project is considered a “Commercial Employment” land use for transportation analysis purposes and is expected to generate greater than 2,400 ADT at project buildout (Year 2035). The project was input into the SANDAG Regional Travel Demand Model to obtain the project’s Employee VMT per Employee. The project’s Employee VMT per Employee was extracted from SANDAG Series 13 Model for the buildout scenario, which assumes the buildout of the project as well as the buildout of the Uptown Community Plan and the neighboring Mission Valley Community Plan. As of writing of this report, based on discussions with SANDAG, SANDAG Series 14 model is not available for project-specific modeling that involves land use modifications (such as the proposed Medical Office Building). Therefore, for the purposes of this project, a Project-Specific Travel Demand Analysis was conducted using the Series 13 model, which is the latest model available for custom projects. Because the project’s VMT per employee was calculated using the Series 13 travel demand model, the Series 13 regional baseline VMT was used to ensure consistency. The project’s resulting Employee VMT per Employee is 16.8 miles, and the regional average is 25.9 miles. As presented above, the VMT significance threshold is 15 percent below the regional average Employee VMT per Employee, or 22.0 miles. The project’s Employee VMT per Employee is calculated to be 65 percent of the regional average, and therefore greater than 15 percent below the regional VMT threshold. Therefore, the project would not result in VMT exceeding thresholds identified in the TSM. Project impacts would be less than significant.

Significance of Impacts

According to the VMT analysis, the project is calculated to be lower than 65 percent of the regional average, which is at least 15 percent below the regional threshold. Therefore, the project would not result in VMT exceeding thresholds identified in the TSM. Based on the project-specific VMT significance thresholds in accordance with the TSM, the project would not result in a significant transportation impact relative to VMT.

Mitigation Measures

Mitigation would not be required.

5.2.4.3 Issue 3

Issue 3: Would the project substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Impact Threshold

According to the City's Thresholds, transportation impacts may be significant if a project would increase traffic hazards to motor vehicles, bicyclists, or pedestrians due to proposed non-standard design features.

Analysis

As described above in Section 5.2.4.1, the project would include improvements to facilitate the movement of motorists, bicyclists, and pedestrians within the site and would provide connections to the surrounding areas. Project improvements relevant to reducing traffic hazards include:

- The project would provide half-width improvements to Washington Street to include a 14-foot-wide parkway with contiguous sidewalk that along the project frontage on the north side of Washington Street fronting the HSB. Due to utility and landscape conflicts, the street trees would be located within 10 feet of the right-of-way.
- On the east side of Fifth Avenue between Fifth Avenue and Washington Street, the project proposes to construct a 10-foot-wide parkway with a five-foot wide landscape buffer and a five-foot wide non-contiguous sidewalk.
- On the north side of Fifth Avenue between Fourth Avenue and Fifth Avenue, the project proposes to construct a 10-foot-wide parkway with a five-foot wide contiguous sidewalk and a five-foot wide landscape buffer.
- On the east side of Fourth Avenue between Lewis Street and Fifth Avenue, the project proposes to construct a 14-foot-wide parkway, which will include an eight-foot wide landscape buffer and six-foot wide non-contiguous sidewalk.
- On the east side of Fourth Avenue between Lewis Street and the MOB frontage, the project would construct a 14-foot-wide parkway, which would include an eight-foot wide landscape buffer and six-foot wide non-contiguous sidewalk
- As part of the project, the project would construct half-width improvements along its Washington Street frontage to implement the ultimate classification of a four-lane Major with buffered Class II bicycle lanes per the Uptown Community Plan. As part of this improvement, the project would stripe a buffered bike lane on the north side of Washington Street along the project frontage.

All transportation facilities would be designed in accordance with applicable City standards, satisfactory to the City Engineer. The project does not propose non-standard design features and is not expected to increase traffic hazards to motor vehicles, bicyclists, or pedestrians.

Significance of Impacts

The project does not propose non-standard design features and would not substantially increase hazards due to design features or incompatible uses. Impacts related to the increase of traffic hazards as a result of the project would be less than significant.

Mitigation Measures

Mitigation would not be required.

Issue 4

Issue 4: Would the project result in inadequate emergency access?

Impact Threshold

According to Appendix G of the CEQA Guidelines, transportation impacts may be significant if a project would result in inadequate emergency access.

Analysis

Adequate emergency access exists to the site today. Additionally, according to information provided by the City's Police Department and the Fire-Rescue Department, emergency response times to all portions of the site are adequate under existing conditions. Public safety facilities (e.g., Fire and Police) are located within a four-mile radius of the project site. Additional emergency requirements, such as fire hydrants, fire hydrant markers (i.e., blue reflectors installed in the roadway), adequate vertical clearances, adequate turning radii, and fire ladder clearances, would be provided in accordance with City requirements.

The project has been designed to meet the emergency, safety, and evacuation policies of the hospital and surrounding community and would not interfere with emergency access in the area. As a hospital with an Emergency Department, the project use itself ensures that appropriate emergency access is available to the surrounding community. The project would not result in inadequate emergency access. Impacts would be less than significant.

Significance of Impacts

The project would be designed in accordance with applicable safety standards. The project would not result in inadequate emergency access. Additionally, the project would promote emergency access by adding additional access to the Emergency Department parking lot via Fifth Avenue. The project would not result in inadequate emergency access. Impacts would be less than significant.

Mitigation Measures

Mitigation would not be required.

Table 5.2-1. Bicycle Facilities

Street Segment	Existing Classification	Future Classification per Uptown Community Plan
Lewis Street First Avenue to Bachman Place Bachman Place to Third Avenue	None None	Class III Class II/Class III
Washington Street Eagle Street to Third Avenue Third Avenue to Fifth Avenue Fifth Avenue to Cleveland Avenue	None None None	Class II Enhanced Class III Class II
University Avenue Eagle Street to First Avenue First Avenue to Third Avenue Third Avenue to Ninth Avenue Ninth Avenue to Richmond Street	Class III Class III None None	Enhanced Class III Class II Class II Class IV
Robinson Avenue Front Street to Fourth Avenue Fourth Avenue to Richmond Street	None Class III	Class III Class III
First Avenue Lewis Street to University Avenue	None	Class III
Bachman Place Arbor Drive to Lewis Street	None	Class II/Class III
Third Avenue Lewis Street to University Avenue University Avenue to Pennsylvania Avenue	None Class III	Enhanced Class III Enhanced Class III
Fourth Avenue Lewis Street to Washington Street Washington Street to Pennsylvania Avenue	None None	None Class IV
Fifth Avenue Lewis Street to Washington Street Washington Street to Robinson Avenue Robinson Avenue to Pennsylvania Avenue	None None Class III	None Class IV Class IV
Sixth Avenue SR 163 direct connector to University Avenue University Avenue to Pennsylvania Avenue	None Class III	None Class III

Table 5.2-2. VMT Significance Thresholds

Land Use Type ¹	Thresholds for Determination of a Significant Transportation VMT Impact ²
Residential	15% below regional average ³ Resident VMT/Capita
Commercial Employment	15% below regional average ³ Employee VMT/Employee
Industrial Employment	Regional average ³ Employee VMT/Employee
Regional retail	Zero net increase in total regional VMT ³
Hotel	See Commercial Employment
Regional Recreational	See Regional Retail
Regional Public Facilities	See Regional Retail
Mixed-Use	Analyze each land use individually per above categories
Redevelopment	Apply the relevant threshold based on proposed land use (ignore the existing land use)
Transportation Projects	Zero net increase in total regional VMT ³

Source: Table 3: Transportation VMT Thresholds of Significance by Land Use per TSM, September 29, 2020.

Footnotes:

1. See Appendix B of the TSM for specific land use designations.
2. Projects that exceed these thresholds would have a significant impact.
3. The regional average and total regional VMT are determined using the SANDAG Regional Travel Demand Model. The specific model version and model year will be approved by the Development Services Department's Transportation Development Section.

Table 5.2-3. Transportation VMT Analysis Methodology by Land Use

Land Use Type	Thresholds for Determination of a Significant Transportation VMT Impact
Commercial Employment	<p>For projects that generate less than 2,400 daily unadjusted driveway trips: Identify the location of the project on the SANDAG Employee VMT/Employee map. The project's Employee VMT/Employee will be considered the same as the Employee VMT/Employee of the census tract it is located in. Compare the project's Employee VMT/Employee to the threshold to determine if the impact is significant OR input the project into the SANDAG Regional Travel Demand Model to determine the project's Employee VMT/Employee.</p> <p>For projects that generate greater than 2,400 daily unadjusted driveway trips: Input the project into the SANDAG Regional Travel Demand Model to provide the project's Employee VMT/Employee. To perform the analysis, all project land uses should be inputted, and the VMT/Capita should be determined using the same method/scripts that SANDAG utilizes to develop the SANDAG Employee VMT/Employee maps.</p>

Source: City of San Diego Transportation Study Manual. Table 4: VMT Analysis Methodology by Land Use.

Table 5.2-4. VMT Screening Criteria – Project Applicability

Screening Criteria ¹	Applicable to the Project?	Does the Project Screen Out?
1. Residential or Commercial Project Located in a VMT Efficient Area	Yes	No
2. Industrial Project Located in a VMT Efficient Area	No	N/A
3. Small Project	No	N/A
4. Locally Serving Retail/Recreational Project	No	N/A
5. Locally Serving Public Facility	No	N/A
6. Affordable Housing	No	N/A
7. Mixed-Use Project Screening Considerations	No	N/A
8. Redevelopment Project Screening Considerations	No	N/A

Footnotes:

1. City of San Diego TSM, September 29, 2020.

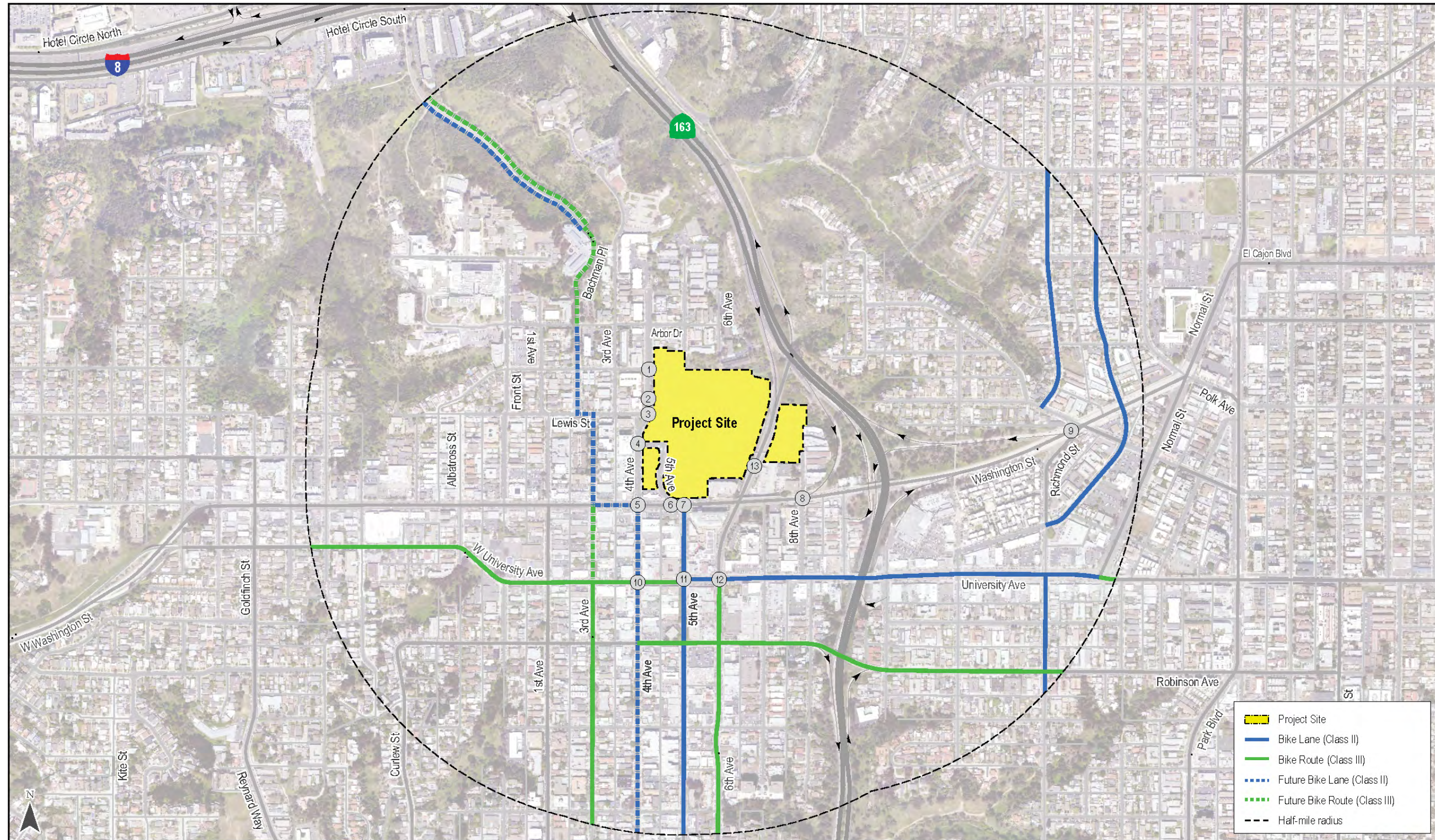


Figure 5.2-1. Existing Bicycle Network

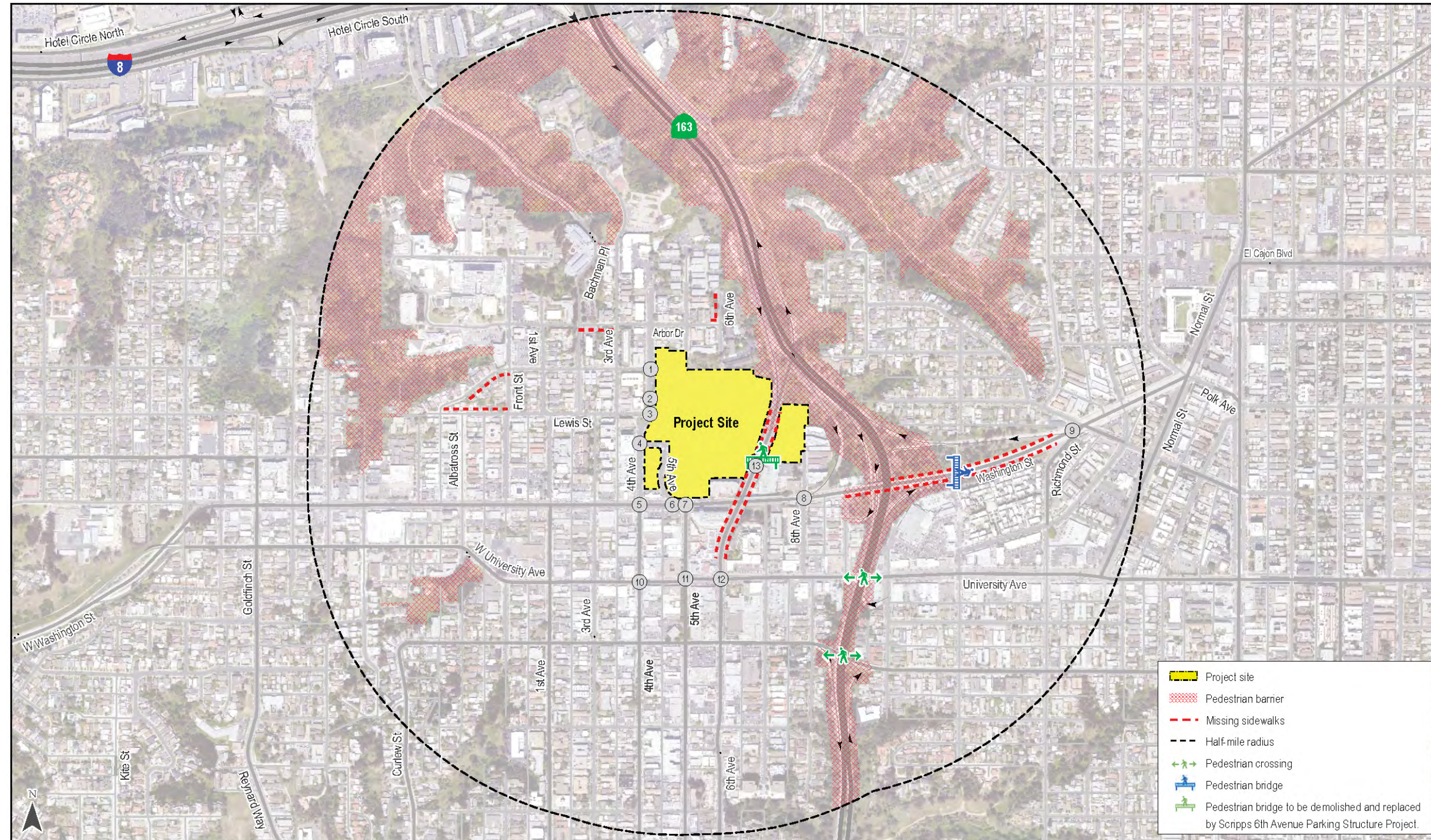


Figure 5.2-2. Existing Pedestrian Network

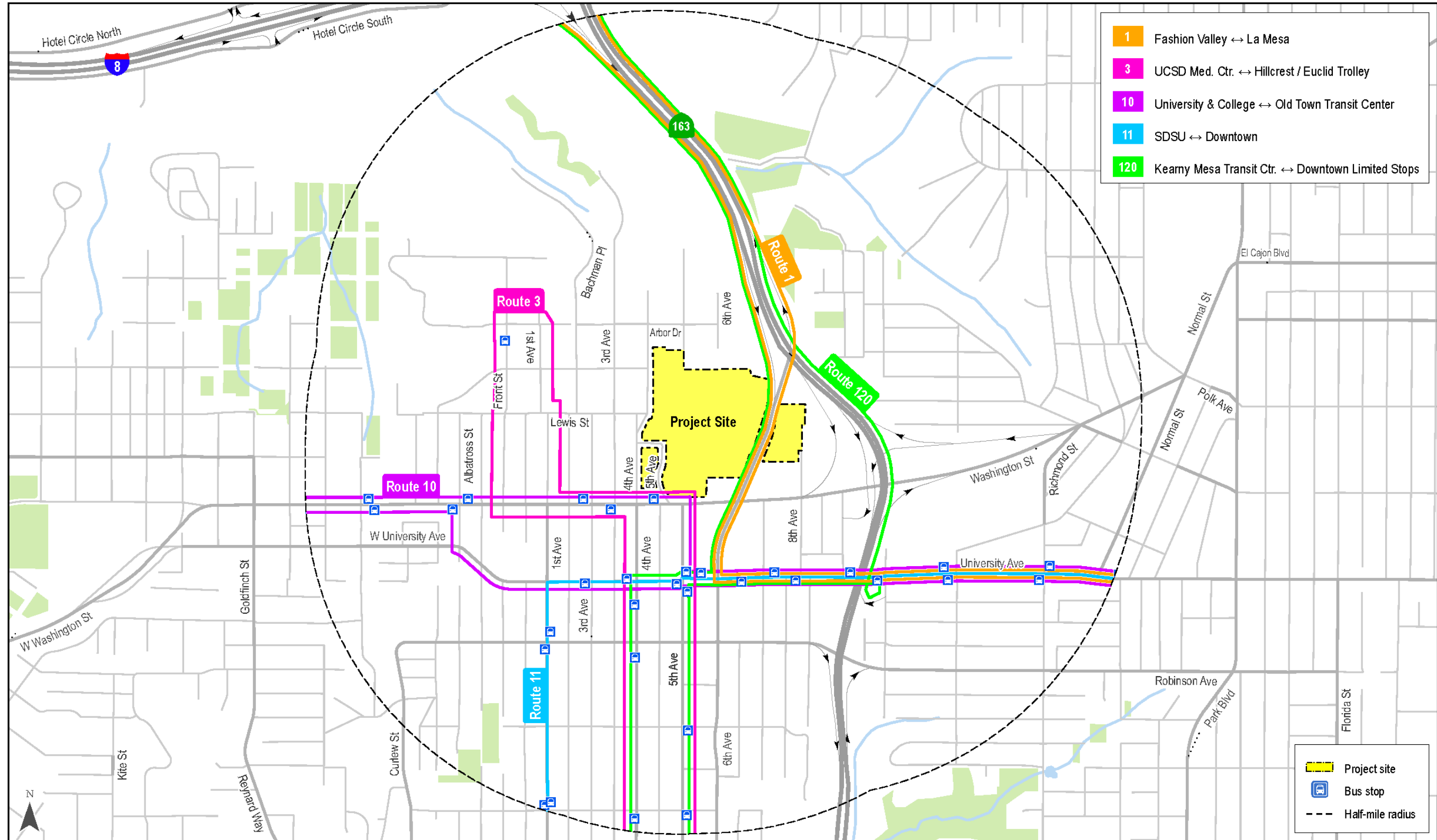


Figure 5.2-3. Existing Transit Network

5.3 Visual Effects and Neighborhood Character

This section describes the existing visual setting of the project and vicinity within the context of the surrounding community. Additionally, this section identifies applicable guidelines and regulations related to visual resources and evaluates potential visual impacts related to implementation of the project.

5.3.1 Existing Conditions

5.3.1.1 Views of the On-Site Development

The project site is situated in the Medical Campus neighborhood in the northcentral portion of the Uptown Community (see Figure 2-2 *Vicinity Map*, and Figure 2-3, *Project Location Map*). The approximately 21.07-acre site is currently developed with the Scripps Mercy Hospital Campus, which consists of hospital and medical office buildings, support and services buildings, parking and circulation, and other amenities (see Section 2.3 *Existing Site Conditions*, and Figure 2-4, *Existing Site Conditions*). Landscaping consists of turf, non-native ornamental vegetation, and trees. Additionally, Mercy Memorial Garden, located to the west of the main hospital entry, is a mix of terraced lawn and hardscape areas, a water feature, and a rose garden.

Varying public views into the medical campus are offered primarily from existing surrounding streets. Views of the project site from the north are provided at the terminus of Fifth Avenue, south of Arbor Drive. Views from this location are of a parking garage, with distant views of the hospital tower and other campus buildings. Views of the project site from the south are provided along Washington Street and from Fifth Avenue. These views are predominantly of the medical office building located at 550 Washington Street, with intermittent views of the hospital tower and other medical office buildings on the Scripps Mercy Hospital campus. Views of the project site from the east are afforded from Sixth Avenue. These views are partially obstructed in many locations due to hillsides separating the campus from Sixth Avenue. Where views are available, views from Sixth Avenue are of the hospital tower, various medical office buildings, and loading and circulation space. Views of the project site from the west are provided along Fourth Avenue. Fourth Avenue views are of the various medical office buildings and hospital tower on the hospital campus. A view into the memorial rose garden outside the hospital tower, as well as on-site parking and parking structures, is also possible.

5.3.1.2 Views from the Project Site to Off-site Development

Views from the project site are of the surrounding urban development. Views to the north of the project site are of existing multi-family and single-family residential developments. Views to the south are of the development adjacent on Washington Street, which includes existing medical office buildings and commercial retail establishments, as well as distant views down Fifth Avenue into the

commercial core of Hillcrest. Views to the east are of the canyons on the east side of Sixth Avenue/SR 163, as well as existing office and residential development. Views to the west are characterized by medical office buildings, multi-family residential developments, commercial retail uses, and a parking garage.

5.3.1.3 Neighborhood Character

The project proposes partial redevelopment of the 21.07-acre Scripps Mercy Hospital Campus located within the Medical Complex neighborhood of the Uptown community. The Medical Complex neighborhood is immediately north of the Hillcrest neighborhood, which houses the commercial and social core of the Uptown community.

The Medical Complex neighborhood sits atop a flat mesa extending north from Washington Street with canyons connections to the Mission Valley community to the north. Traditionally, development within the Medical Complex has been predominantly automobile-oriented medical center uses, and buildings are noticeably taller in the Medical Complex than development in adjacent Hillcrest, with the two medical centers (Scripps Mercy Hospital and UCSD Medical Center) containing the tallest structures in the neighborhood. The western portion of Medical Complex has more single family housing and residential structures. Development intensities, both residential and institutional, are generally higher in the Medical Complex neighborhood than in the majority of Uptown due to the hospitals and medical office buildings having a higher intensity of building floor area.

The Medical Complex is dominated by the Scripps Mercy Hospital campus and the UCSD Medical Center, which occupy over 40 percent of the neighborhood. The remaining portion of the Medical Complex neighborhood is occupied primarily by residential uses, the majority being multi-family. Commercial development, which is mostly auto-oriented, is located on the north side of Washington Street and sporadically surrounds the medical centers. The Medical Complex neighborhood contains the lowest proportion of single-family homes in Uptown. Multi-family buildings are more contemporary in building style and architecture, reflecting a combination of mid-century, late Modern, and Post-Modern styles. The medical buildings have an institutional character that distinguishes them from other development in Uptown; there is a much higher occurrence of free-standing parking garages, many of which have been sited in canyons to reduce the apparent mass. The character of the pedestrian focus varies according to the surrounding use. The residential areas generally have a pedestrian focus with street trees, while the hospital areas traditionally have a more vehicular access focus.

The block pattern of the Medical Complex neighborhood is characterized by long north-south blocks with mid-block alleys. Approaching the canyons, the block dimensions begin to shift, first losing the mid-block alley, and then morphing into large-scale development parcels and curvilinear cul-de-sacs that respond to the topography at the canyon interface. The scale of the residential streets in the Medical Complex neighborhood is characterized by narrow, intimate streets. With the exception of Bachman Place which extends north through the area to Mission Valley, the streets in the Medical

Complex only provide for internal circulation with the only external connection being to Washington Street.

The Hillcrest neighborhood, located immediately south of the site, contains a diverse mix of retail, office, and mixed-use developments, as well as a varied residential character. Hillcrest includes the primary commercial core of Uptown, which is concentrated around the intersection of Fifth Avenue and University Avenue and extends several blocks east, west, and south. This area is also marked by the iconic Hillcrest gateway sign, at University and Fifth Avenues, serving as a key neighborhood identity feature. This area is a vibrant pedestrian-oriented commercial center, as well as the center of community-wide activity with active, walkable streets, mixed-use buildings and retail, office, and entertainment activities.

Hillcrest is one of the more intensely developed neighborhoods in Uptown. The neighborhood includes a variety of multi-family residential and mixed-use buildings. Hillcrest also has a large number of office and retail uses in the community, particularly in the core retail district where building setbacks are not required. The area also includes high-rise buildings, all of which were developed to take advantage of views of either Balboa Park or the San Diego Bay. Taller buildings are scattered but tend to be located in the core along Fifth Avenue, near Park Boulevard and University Avenue, or at the north end of Balboa Park.

Buildings in Hillcrest include a range of architectural styles. Single-family residential clusters along First and Second Avenues, and east of SR 163 and south of Robinson, include styles associated with early development, such as Craftsman, Bungalow, Prairie, and Mission and Spanish Revival. Infill development has introduced new architectural forms and styles, many of which try to complement the form, scale and stylistic precedents found within Hillcrest.

Hillcrest is generally characterized by a street grid pattern that includes little variation in response to topography. The predominant block pattern consists of long rectangular blocks (300 feet by 600 feet) with a mid-block alley running the length of the block. While retaining the same general dimensions, the blocks are oriented north-south along the avenues. They are rotated east-west along University Avenue and Robinson Avenue, and then northeast/southwest along Normal Street. Despite this grid pattern, Robinson Avenue, University Avenue, and Washington Street are the only streets that provide contiguous east-west connections through Hillcrest, due to the divide created by SR 163 and natural canyons. Hillcrest is the crossroads of Uptown, with major streets intersecting in Hillcrest's core.

5.3.1.4 Light/Glare/Shading

Lighting from commercial office, retail, and multi-family residential development, as well as street lighting on public streets and freeways, predominates the area. Because the majority of development in the project area is comprised of multi-family residential developments, glare from an expanse of windows is minimal. The nearest office building is located to the south of the project

site and is approximately seven stories in height. The design of that building combines concrete and windows, which limits the amount of glare. Relative to shading, there are no buildings in the immediate project area that can cast substantial shadows on the project site for extended periods of time.

5.3.2 Regulatory Framework

5.3.2.1 Uptown Community Plan

The Urban Design Element of the Uptown Community Plan contains guidance relative to the existing context and urban form, urban design framework, streetscape and public realm, development form, and the CPIOZ. Relevant goals and policies of the Urban Design Element of the Uptown Community Plan are included in Table 5.1-2, *Uptown Community Plan Consistency*.

The Uptown Community Plan does not identify any view corridors or viewsheds within the project site or immediate surroundings. The closest Community Plan-designated public viewshed is located in the northern portion of the Medical Complex neighborhood along Bachman Place within the UCSD Medical Campus (Figure 5.3-1, *Uptown Community Canyons and Views*).

Relative to the project site, as presented in Table 5.1-2, *Uptown Community Plan Consistency*, the Urban Design Element of the Community includes goals that address such items as:

- Development Diversity,
- Building Scale, and
- Sustainable Development.

Specific polices pertain to the following:

- Design character.
- Streetscape landscaping, amenities, street tree, tree grates, and street furniture.
- Lighting, particularly at the pedestrian level.
- Location of refuse and recycling containers.
- Treatment of walls and windows.
- Building materials, finishes and colors.
- Signage.
- Building entrances and architectural features.
- Treatment of transit stops.
- Provision of shading structures and other features for passive cooling and to minimize solar heat gain.
- Provision of semi-public outdoor spaces.
- Building design, orientation and architecture.
- Location of surface parking.

- Renewable energy elements.
- Preservation and adaptive reuse of historic structures.
- Building scale and massing.

Policy UD-3.8 is specific to the project and states:

- Encourage landscaping, screening and architectural design to enhance the appearance of hospital facilities. In particular, Mercy Hospital as viewed from the Sixth Avenue extension and the appearance of the Arbor Street parking structure, Bachman Canyon parking structure, and hillside areas within the UCSD Medical Center facility and the Somerset Hillcrest adjacent to Mercy Hospital.

(For a complete and detailed list of all goals and policies relevant to the project, see Table 5.1-2, *Uptown Community Plan Consistency*.)

5.3.2.2 San Diego Municipal Code

Chapters 11 through 15 of the SDMC are referred to as the LDC, as they contain the City's Land Development Regulations that dictate how land is to be developed and used within the City.

Lighting Regulations

Outdoor lighting is regulated by Section 142.0740 of the City of San Diego LDC. The purpose of the City's outdoor lighting regulations is to minimize negative impacts from light pollution including light trespass, glare, and urban sky glow in order to preserve enjoyment of the night sky and minimize conflict caused by unnecessary illumination. Regulation of outdoor lighting is also intended to promote lighting design that provides for public safety and conserves electrical energy. New outdoor lighting fixtures must minimize light trespass in accordance with the Green Building regulations where applicable, or otherwise shall direct, shield, and control light to keep it from falling onto surrounding properties. No direct-beam illumination is permitted to leave the premises. The City's lighting regulations require that most outdoor lighting be turned off between 11:00 PM and 6:00 AM with some exceptions (such as lighting provided for commercial uses that continue to be fully operational after 11:00 PM, adequate lighting for public safety, etc.).

Glare Regulations

Glare within the City is controlled by SDMC, Section 142.0730 (Glare Regulations). The City's Glare Regulations (City of San Diego 2012) include the following:

- A maximum of 50 percent of the exterior of a building may be comprised of reflective material that has a light-reflectivity factor greater than 30 percent (Section 142.0730 (a)).
- Reflective building materials shall not be permitted where the City Manager determines that their use would contribute to potential traffic hazards, diminished quality of riparian habitat, or reduced enjoyment of public open space (Section 142.0730 (b)).

5.3.3 Impact Analysis

5.3.3.1 Issue 1

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

Impact Thresholds

The City's Thresholds establish thresholds for potential impacts to public views from designated open space areas, roads, or parks, and for project impacts to visual landmarks or scenic vistas. In order for a project to result in a significant impact, one or more of the following conditions must apply:

- The project would substantially block a view through a designated public view corridor as shown in an adopted community plan, the General Plan, or the Local Coastal Program;
- The project would cause substantial view blockage from a public viewing area of a public resource (such as the ocean) that is considered significant by the applicable community plan; or
- The project exceeds the allowed height or bulk regulations, and this excess results in a substantial view blockage from a public viewing area.

Analysis

The Uptown Community Plan includes a discussion of views and includes locations of public viewsheds and public view corridors in Figure 4-3, *Canyons and Views*, of the Uptown Community Plan (reproduced in this text as Figure 5.3-1). Neither the Community Plan text nor Figure 4-3 of the Community Plan identify any designated public view corridors or designated public viewing areas that are considered significant on the project site or in the project vicinity. Additionally, because development would occur on the existing developed campus in generally the same location and at generally similar scale to what exists currently, there would be negligible change to existing views to or from the site. No impacts to public views would result.

Significance of Impact

The Uptown Community Plan does not include any designated view corridors or public viewing areas on the project site. No impacts would result.

Mitigation Measures

Mitigation would not be required.

5.3.3.1 Issue 2, Issue 3, and Issue 4

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

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

Issue 4 Would the project result in substantial alteration to the existing or planned character of the area, such as could occur with the construction of a subdivision in a previously underdeveloped area? Note: for substantial alteration to occur, new development would have to be of a size scale or design that would markedly contrast with the character of the surrounding area.

Impact Thresholds

Based on the City's Thresholds, a project could result in a significant impact associated with visual quality and neighborhood compatibility if it would:

- Create a disorganized appearance and would substantially conflict with City codes (e.g., a sign plan which proposes extensive signage beyond the City's sign ordinance allowance).
- Significantly conflict with the height, bulk, or coverage regulations of the zone and does not provide architectural interest (e.g., a tilt-up concrete building with no offsets or varying window treatment).
- Exceed the allowable height or bulk regulations and the height and bulk of the existing patterns of development in the vicinity of the project by a substantial margin.
- Include crib, retaining, or noise walls greater than six feet in height and 50 feet in length with minimal landscape screening or berming where the walls would be visible to the public.
- Have an architectural style or use building materials in stark contrast to adjacent development where the adjacent development follows a single or common architectural theme (e.g., Gaslamp Quarter, Old Town).
- Be located in a highly visible area (e.g., on a canyon edge, hilltop, or adjacent to an interstate highway) and would strongly contrast with the surrounding development or natural topography through excessive height, bulk, signage, or architectural projections.

Analysis

The character of the area surrounding the Scripps Mercy Hospital Campus is a mix of hospital and medical office uses, commercial retail space, parking facilities, and largely multi-family residential developments. As described above, structure heights within both the Scripps Mercy Hospital and UCSD medical campuses are among the tallest in the community. Other development types in the project area have scales ranging from single-story residential and commercial uses to multi-story medical office buildings. No single architectural theme is present within the Medical Complex neighborhood or adjacent Hillcrest neighborhood.

The project would involve redevelopment of portions of the Scripps Mercy Hospital Campus, with a number of buildings and uses to remain as described in Chapter 3.0 *Project Description* of this EIR. The project would demolish approximately 881,000 square feet of existing uses and construct approximately 1.5 million square feet of new uses. The project would result in a net increase of approximately 673,000 square feet of development intensity on the site. Uses to be demolished would be replaced with similar uses. The buildings/uses to be demolished include hospital, medical office, parking, and support buildings and new construction would include hospitals, medical office buildings, parking structures, and support buildings. Project development would increase the development intensity on-site, but this increase in development intensity would not result in a significant visual effect due to the compatibility with existing uses and the surroundings, as well as design elements, massing, and setbacks as described below.

As disclosed in Table 5.1-2, *Uptown Community Plan Consistency*, the project would be consistent with the relevant policies of the Urban Design Element of the Uptown Community Plan, including those relative to community character. The project use is consistent with the land use designations for the site, and design would comply with the policies of the Urban Design Element, including building articulation, massing, and pedestrian scale. The project would not create a negative aesthetic site or property, nor would it create a disorganized appearance. In fact, the project design results in a more efficient campus integrated and connected by an enhanced pedestrian focus. Due to the partial redevelopment of the campus, building design takes into account the relation to off-site areas, as well as on-site buildings to remain, resulting in a cohesive appearance of old and new. Building materials would be compatible with what exists currently, conveying the character of an urban project and reflecting the medical campus setting.

The project's architectural elements are intended to provide interesting and identifiable features, which would allow pedestrians and motorists to easily find their destinations, with tower elements at Washington Street and interior to the campus to provide landmark wayfinding in the same way existing buildings to be demolished do currently. Architectural features such as varied building material, heights, and stepbacks would provide vertical relief to the façades and would create focal points around the project for both pedestrians and passing vehicles. Project design includes recessed and protruding elements, such as windows and overhangs, to add visual interest and character to the project site. Building mass and rooflines would be varied, as would be proposed finishes and materials, as described above.

The project includes extensive landscaping of the campus. Plant materials would be used at the ground level to not only create interest, but also integrate architectural forms within the site. Paths, walkways, and buildings would include a variety of materials and colors to create visual interest and encourage a higher level of use. The campus' north and east edges engage Bachman Canyon, a dramatic landform typical of coastal California. The south and west edges engage one of the oldest, most vibrant and pedestrian-friendly neighborhoods in San Diego. Because of its proximity to the canyon edge, building sites are in many cases compact and marked by steep grade changes. This provides opportunity to create landscape spaces between and around buildings that reflect the

canyon's planting and vertical spatial character. This character and planting and materials palette is pulled through the campus, creating a rich contrast with the urban context. This intertwining of natural and built infrastructure is characteristic throughout San Diego and the Uptown in particular, giving the Scripps Mercy medical center a distinct identity and sense of place.

A series of landscape zones/plant palettes have been identified and classified for the project. The zones relate to the form, function and character of the plant material in relationship to site.

The *Canyon Accent* zone located in narrow courtyards between buildings and adjacent properties and also visitor drop-off/ entry plaza, extending to intersection of Washington and Fifth Avenue. This palette includes clustered groups of palm trees or canopy trees to provide screening, understory planting of succulents, native grasses and perennial accents, large boulder and cobble mulch to discourage gathering and encampments as well as retain grade in steep conditions.

The *Accent* zone located throughout campus at circulation nodes, gathering and waiting areas and as focal accents. This palette includes canopy and flowering accent trees located at patios and seating areas to provide shade and comfort and at key focal points and understory planting of succulents, flowering shrubs, groundcovers and perennials, and grasses.

The *Screening/Buffer-Chaparral Canyon* zone located along the canyon interface on the east side of the site at Sixth Avenue and at the Sixth Avenue staff parking structure. The intent is to tie into existing canyon landscape and includes native trees and evergreen shrubs in drifts, masses and groves to provide screened views in and out of the site.

The *Screening/Buffer-Evergreen Ornamental* zone located along the uptown interface on the west and south sides, and within the campus complex where privacy and screening are concerns. The intent is to provide a "green wall" or soft screen that feels garden-like and includes evergreen shrubs in formal rows, clipped as hedges or loose masses bark or rock mulch at all planting areas.

The *Bio-Filtration Planting* zone located at stormwater treatment areas as indicated on plans. The intent is to use materials that express riparian character of natural streams and arroyos and includes masses of rushes, reeds, grasses and flowering accent shrubs and perennials. The *Streetscape* zone located along Fifth Ave, Lewis and Washington Streets. The intent is to provide clean, low maintenance and uniform streetscape palette that communicates continuity within the campus and includes street trees per streetscape manual or to match opposite side of street understory planting is evergreen groundcover or grasses in continuous bands.

The project would not degrade the visual character of the project site or its surrounding. The project would also not result in creating a negative aesthetic site or property.

As described above, bulk and scale would be compatible with what exists that would remain currently on-site, as well as what is within the surrounding community. Existing structures to be demolished have similar bulk and scale to what would be developed in their place, resulting in no discernable difference to the existing bulk and scale on-site. However, the project would require deviations relative to bulk and scale: deviations for maximum structure height and deviations for maximum floor area ratio. As described in Chapter 3.0, the maximum structure height deviation would allow for select development/portions of buildings to exceed the 100-foot height limit of the CC-3-8 zone and the maximum floor area ratio deviation would allow selection buildings to exceed the maximum FAR of the 2.0 in the CC-3-8 zone. These deviations allowed for the site are to be used most efficiently, especially when taking into consideration the existing structures to remain, while allowing the hospital to modernize in a manner that best serves its public health mission and the community. For example, the existing hospital building is 12 stories in height. The proposed hospitals would be 15 stories in height. Both the existing and proposed buildings deviate from the maximum allowed structure height. The existing 550 Washington Street building is eight stories, and the proposed MOB would be ten stories. Thus, both the existing and proposed structures would be a similar height. Impacts would be less than significant.

The project would not include crib, retaining, or noise walls greater than six feet in height and 50 feet in length with minimal landscape screening or berming where walls would be visible to the public. Additionally, while the project is located in an area with moderate to high visibility, depending on the vantage point, the project would not contrast with the surrounding development or natural topography. As noted above, the project would be compatible with both what is existing on-site that would remain and what exists in the surrounding community. No impacts would result.

Significance of Impacts

The project would not result in substantial alteration to the existing or planned character of the area, contrast with existing surrounding development through excessive height or bulk, or result in an architectural style or building materials in contrast with surrounding development. Therefore, impacts would be less than significant.

Mitigation Measures

Mitigation would not be required.

5.3.3.2 Issue 5

Issue 5 Would the project create substantial light or glare that would adversely affect daytime or nighttime views in the area?

Impact Thresholds

Based on the City's Thresholds, a project could result in a significant impact associated with light and glare if it would:

- Be moderate to large in scale, more than 50 percent of any single elevation of a building's exterior is built with a material with a light reflectivity greater than 30 percent, and the project is adjacent to a major public roadway or public area.
- Shed substantial light onto adjacent, light-sensitive property or land use, or would emit a substantial amount of ambient light into the nighttime sky. Uses considered sensitive to nighttime light include, but are not limited to, residential, some commercial and industrial uses, and natural areas.

Analysis

The project area currently contains existing lighting sources, such as on-site buildings, on-site lighting for buildings and circulation areas, parking area lighting, and pedestrian pathway lighting. Adjacent sources of light occur from streetlights along roadways, surrounding developments, and associated parking lighting.

Lighting

Landscaping and architectural features of the project would be illuminated and accented with lighting. Lighting would be provided for new buildings, parking structures, and the Emergency Department surface parking. Additional lighting would be provided in pedestrian and circulation areas for added security. The project would not create a new source of substantial light that would adversely affect daytime or nighttime views in the area. Outdoor lighting would be regulated by compliance with Section 142.0740 of the City LDC and would not trespass onto adjacent properties or into the nighttime sky. Impacts relative to lighting would be less than significant.

Glare

Glare within the project would be regulated by the LDC to ensure no impact would occur relative to glare. Glare would be avoided in accordance with Section 142.0730 of the LDC. Less than 50 percent of building façades would incorporate glass or other reflective material that would cause glare effects on surrounding roadways and properties. Where glass is incorporated, it would be non-reflective in nature and meet the 30 percent reflectivity factor requirement. Impacts relative to glare would be less than significant.

Shading

The project would not contribute to shading of surrounding areas. The tallest portions of the proposed development would generally be within the central portion of the hospital campus, or along the southern boundary where shading would predominantly occur on-site. Additionally, buildings within the hospital campus already contribute shading both on- and off-site. Development

of the project would not substantially alter the existing shading patterns on-site and within the project vicinity. Impacts relative to shading would be less than significant.

Significance of Impacts

The project would not result in significant lighting, glare, or shading impacts. The project is not anticipated to create a new source of substantial light that would adversely affect daytime or nighttime views in the area, as the project lighting would be in conformance with the City's outdoor lighting regulations. Glare impacts would not occur because the project would consist of less than 50 percent reflective materials in compliance with the City's glare regulations. The impact of shadows cast by the project would not be considered significant.

Mitigation Measures

Mitigation would not be required.

5.3.3.3 Issue 6

Issue 6 Would the project result in the loss of any distinctive or landmark tree(s), or stand of mature trees as identified in a community plan? (Normally, the removal of non-native trees within a wetland as part of a restoration project would not be considered significant.)

Impact Thresholds

According to the City's Thresholds, a project is considered to have a significant impact if the project would result in the physical loss, isolation, or degradation of a community identification symbol or landmark (e.g., a stand of trees, coastal bluff, historic landmark) that is identified in the General Plan, applicable community plan, or local coastal program.

Analysis

The Uptown Community Plan does not identify any distinctive or landmark tree(s), or any stand of mature trees for the project site. Specimen trees are identified in the Uptown Community Plan for Lark Street and Kate Sessions Balboa Park Nursery Site, which are not located on, adjacent to, or near the project site. Vegetation on-site is ornamental in nature and includes mature trees; the project landscaping includes an extensive palette of interior and street trees to be provided with development. No impacts relative to distinctive or landmark trees, or a stand of mature trees, as identified in the Uptown Community Plan would occur.

Significance of Impact

No distinctive, landmark, or stand of mature trees is identified on the project site. No impacts would occur.

Mitigation Measures

Mitigation would not be required.

5.3.3.4 Issue 7

Issue 7 *Would the project result in a substantial change in the existing landform?*

Impact Threshold

According to the City's Thresholds, a project is considered to have a significant impact if a project would result in more than 2,000 cy of earth per graded acre by either excavation or fill. In addition, one or more of the following conditions (1 through 4) must apply to meet this significance threshold:

1. The project would disturb steep hillsides in excess of the encroachment allowances of the Environmentally Sensitive Lands regulations (LDC Chapter 14, Article 3, Division 1). In evaluating this issue, environmental staff should consult with permit staff.
2. The project would create manufactured slopes higher than ten feet or steeper than 2:1 (50 percent).
3. The project would result in a change in elevation of steep hillsides as defined by the SDMC Section 113.0103 from existing grade to proposed grade of more than 5 feet by either excavation or fill, unless the area over which excavation or fill would exceed 5 feet is only at isolated points on the site. (A continuous elevation change of 5 feet may be noticeable in relation to surrounding areas. In addition, such a change may require retaining walls and other features to stabilize slopes, potentially resulting in a manufactured appearance.)
4. The project design includes mass terracing of natural slopes with cut or fill slopes in order to construct flat-pad structures.

However, the above conditions may not be considered significant if one or more of the following apply:

1. The grading plans clearly demonstrate, with both spot elevations and contours, that the proposed landforms will very closely imitate the existing on-site landform and/or the undisturbed, pre-existing surrounding neighborhood landforms. This may be achieved through "naturalized" variable slopes.
2. The grading plans clearly demonstrate, with both spot elevations and contours, that the proposed slopes follow the natural existing landform and at no point vary substantially from the natural landform elevations.
3. The proposed excavation or fill is necessary to permit installation of alternative design features such as step-down or detached buildings, non-typical roadway or parking lot designs, and alternative retaining wall designs which reduce the project's overall grading requirements.

Analysis

The Scripps Mercy Hospital Campus is located in a relatively flat mesa top that extends from within the Uptown Community to the south and overlooks Mission Valley to the north. The only substantial

landform features are steep slopes that rim the campus along the east within Mercy Canyon and north within Bachman Canyon.

Redevelopment of the project would result in greater than 2,000 cy of earth per graded acre by either excavation or fill. Grading for the project would result in 11.08 acres of on-site area to be graded (Figure 3-4, *Scripps Mercy Campus Hospital Campus Grading Plan*). The amount of cut would be 155,000cy with a maximum depth of 49 feet; the amount of fill would be 42,500cy with a maximum depth of 33 feet. Grading would result in a net export of 112,500 cy. Grading is primarily associated with construction of subterranean parking garages and would not substantially alter the existing mesa top landform.

None of the conditions identified above in the Impact Thresholds would apply to the project. The project would not disturb steep hillsides located along and beyond the project site's eastern border and, thus, would not exceed the encroachment allowances of the Environmentally Sensitive Lands regulations (LDC Chapter 14, Article 3, Division 1). The project would not create manufactured slopes steeper than 2:1 (50 percent). The project would not result in a change in elevation of steep hillsides as defined by the SDMC Section 113.0103. The project design does not include mass terracing of natural slopes with cut or fill slopes in order to construct flat-pad structures, as no natural slopes are present on-site. Since the project would not meet any of the primary conditions, the secondary criteria delineated above does not apply. No significant impacts would result.

Significance of Impact

The development area of the project site does not contain steep hillsides and would not involve grading that exceeds the secondary significance thresholds relative to grading. Impacts to landform alteration would be less than significant.

Mitigation Measures

Mitigation would not be required.

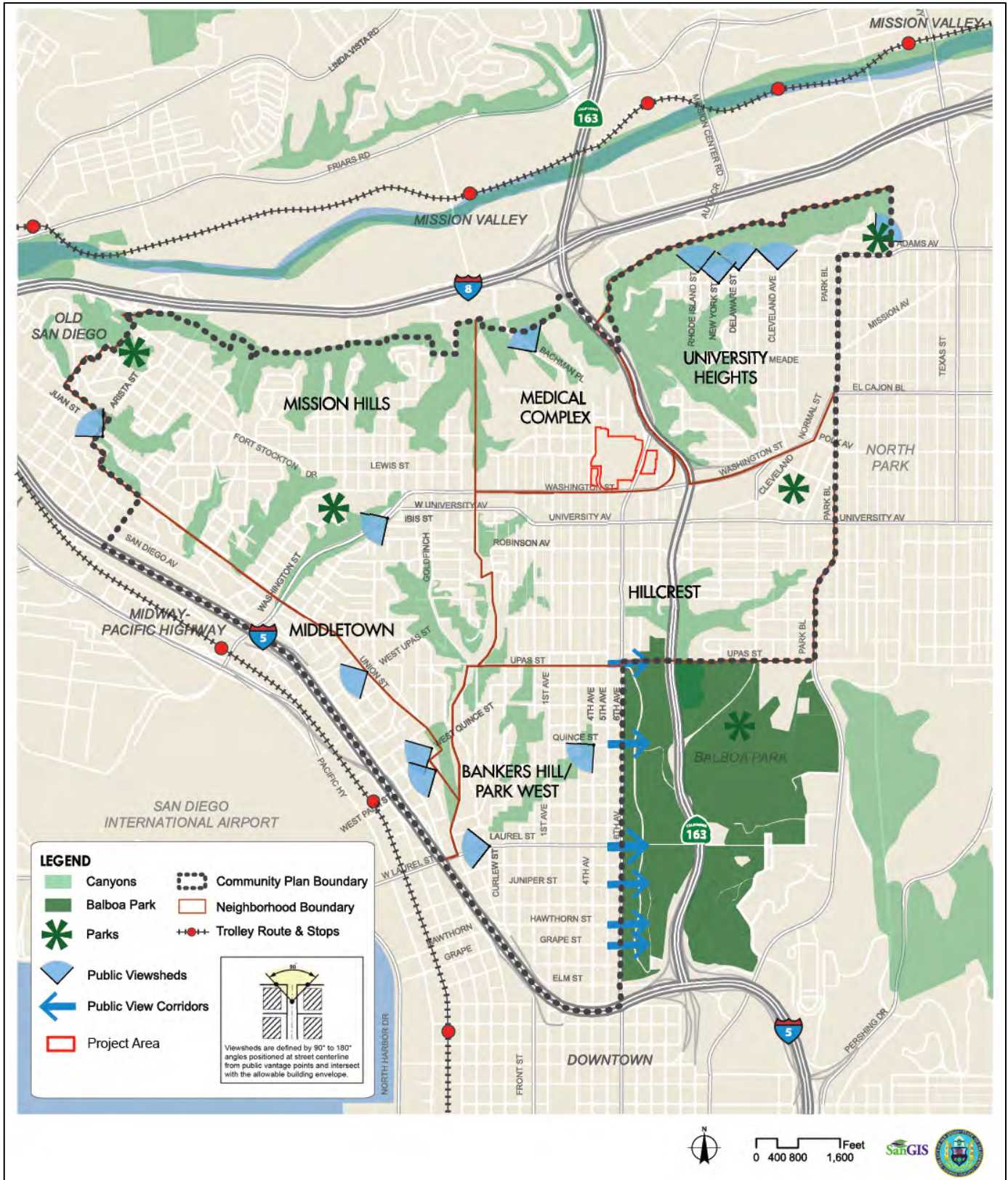


Figure 5.3-1. Uptown Community Canyons and Views

5.4 Air Quality

This section evaluates potential short-term (construction) and long-term (operational) air quality and odor impacts associated with the project. This section also includes a health risk assessment (HRA) for the project. The following discussion is based on the *Air Quality Technical Report* prepared for the project by BlueScape Environmental, dated June 8, 2022, included as Appendix E.

5.4.1 Existing Conditions

5.4.1.1 Regional Climate and Meteorology

The weather of San Diego County is profoundly influenced by the Pacific Ocean and its semi-permanent high-pressure systems that result in dry, warm summers and mild, occasionally wet winters. The average minimum temperature for January ranges from the mid-40s to the high-50s degrees Fahrenheit (four to 15 degrees Celsius) across the county. July maximum temperatures average in the mid-80s to the high-90s degrees Fahrenheit (high-20s to the high-30s degrees Celsius). Most of the county's precipitation falls from November to April, with infrequent (approximately 10 percent) precipitation during the summer. The average seasonal precipitation along the coast is approximately 10 inches (254 millimeters); the amount increases with elevations as moist air is lifted over the mountains.

The weather of San Diego County, including the San Diego Air Basin (SDAB), is dominated by a semi-permanent high-pressure cell located over the Pacific Ocean. The interaction of ocean, land, and the Pacific High-Pressure Zone maintains clear skies for much of the year and drives the prevailing winds. Local terrain is often the dominant factor inland and winds in inland mountainous areas tend to blow upwards in the valleys during the day and down the hills and valleys at night.

In conjunction with the onshore/offshore wind patterns, there are two types of temperature inversions (reversals of the normal decrease of temperature with height) that occur within the region that affect atmospheric dispersive capability and that act to degrade local air quality. In the summer, an inversion at about 1,100 to 2,500 feet (335 to 765 meters) is formed over the entire coastal plain when the warm air mass over land is undercut by a shallow layer of cool marine air flowing onshore. The prevailing sunny days in the region further exacerbate the smog problem by inducing additional adverse photochemical reactions. During the winter, a nightly shallow inversion layer (usually at about 800 feet or 243 meters) forms between the cooled air at the ground and the warmer air above, which can trap vehicular pollutants. The days of highest carbon monoxide (CO) concentrations occur during the winter months.

The predominant onshore/offshore wind pattern is sometimes interrupted by so-called Santa Ana conditions, when high pressure over the Nevada-Utah region overcomes the prevailing westerly wind direction. This draws strong, steady, hot, and dry winds from the east over the mountains and

out to sea. Strong Santa Ana winds tend to blow pollutants out over the ocean, producing clear days. However, at the onset or breakdown of these conditions or if the Santa Ana is weak, prevailing northwesterly winds are reestablished which send polluted air from the Los Angeles basin ashore in the SDAB. Smog transport from the South Coast Air Basin (the metropolitan areas of Los Angeles, Orange, San Bernardino, and Riverside counties) is a key factor on more than half the days San Diego exceeds clean air standards.

5.4.1.2 Pollutants of Concern

Criteria pollutants are defined by State and Federal law as a risk to the health and welfare of the general public. These compounds are criteria air pollutants from construction and operational activities, are toxic air contaminants (TACs) from construction activities at the project site.

The seven criteria air pollutants regulated under National Ambient Air Quality Standards (NAAQS) include: ozone (O₃), CO, nitrogen dioxide (NO₂), respirable particulate matter (PM₁₀), fine particulate matter (PM_{2.5}), sulfur dioxide (SO₂), and lead (Pb). These pollutants are described below. Primary standards are designed to protect human health with an adequate margin of safety. Secondary standards are designed to protect property and the public welfare from air pollutants in the atmosphere. Areas that do not meet the NAAQS for a particular pollutant are considered to be “non-attainment areas” for that pollutant.

Ozone

Ozone is produced by a photochemical reaction (triggered by sunlight) between oxides of nitrogen (NO_x) and reactive organic gas (ROG). Nitrogen oxides are formed during the combustion of fuels, while reactive organic compounds are formed during combustion and evaporation of organic solvents. Because ozone requires sunlight to form, it mostly occurs in concentrations considered serious between the months of April and October. Ozone is a pungent, colorless, toxic gas with direct health effects on humans including respiratory and eye irritation and possible changes in lung functions. Groups most sensitive to ozone include children, the elderly, people with respiratory disorders, and people who exercise strenuously outdoors.

Reactive Organic Gases

ROGs [also known as volatile organic gases (VOCs) are compounds composed primarily of hydrogen and carbon atoms. Internal combustion associated with motor vehicle usage is the major source of ROGs. Other sources of ROGs include evaporative emissions from paints and solvents, the application of asphalt paving, and the use of household consumer products such as aerosols. Adverse effects on human health are not caused directly by ROGs, but rather by reactions of ROGs to form secondary pollutants such as ozone.

Carbon Monoxide

CO is a local pollutant that is found in high concentrations only near the source. The major source of carbon monoxide, a colorless, odorless, poisonous gas, is automobile exhaust. Elevated CO concentrations; therefore, are usually only found near areas of high traffic volumes operating in congested conditions. Health effects from CO are related to blood hemoglobin. At high concentrations, carbon monoxide reduces the amount of oxygen in the blood, causing heart difficulties in people with chronic diseases, reduced lung capacity and impaired mental abilities.

Particulate Matter and Fine Particulate Matter

PM₁₀ is particulate matter measuring no more than 10 microns in diameter, while PM_{2.5} is fine particulate matter measuring no more than 2.5 microns in diameter. Suspended particulates are mostly dust particles, nitrates and sulfates. Both PM₁₀ and PM_{2.5} are by-products of fuel combustion and wind erosion of soil and unpaved roads and are directly emitted into the atmosphere through these processes. Suspended particulates are also created in the atmosphere through chemical reactions. The characteristics, sources, and potential health effects associated with the small particulates (those between 2.5 and 10 microns in diameter, or PM₁₀) and fine particulates (PM_{2.5}) can be very different. The small particulates generally come from windblown dust and dust kicked up from mobile sources. The fine particulates are generally associated with combustion processes as well as being formed in the atmosphere as a secondary pollutant through chemical reactions. Fine particulate matter is more likely to penetrate deeply into the lungs and poses a health threat to all groups, but particularly to the elderly, children, and those with respiratory problems. More than half of the small and fine particulate matter that is inhaled into the lungs remains there. These materials can damage health by interfering with the body's mechanisms for clearing the respiratory tract or by acting as carriers of an absorbed toxic substance.

Nitrogen Dioxide

NO₂ is a by-product of fuel combustion, with the primary source being motor vehicles and industrial boilers and furnaces. The principal form of nitrogen oxide produced by combustion is nitric oxide (NO), but NO reacts rapidly to form NO₂, creating the mixture of NO and NO₂ commonly called NO_x. Nitrogen dioxide is an acute irritant. A relationship between NO₂ and chronic pulmonary fibrosis may exist and an increase in bronchitis in young children at concentrations below 0.3 parts per million (ppm) may occur. Nitrogen dioxide absorbs blue light and causes a reddish-brown cast to the atmosphere and reduced visibility. It can also contribute to the formation of PM₁₀ and acid rain.

Sulfur Dioxide

SO₂ is a colorless, reactive gas that is produced from the burning of sulfur-containing fuels such as coal and oil and by other industrial processes. Generally, the highest concentrations of SO₂ are found near large industrial sources. SO₂ is a respiratory irritant that can cause narrowing of the airways leading to wheezing and shortness of breath. Long-term exposure to SO₂ can cause respiratory illness and aggravate existing cardiovascular disease.

Lead

Lead in the atmosphere occurs as particulate matter. With the phase-out of leaded gasoline, large manufacturing facilities are the sources of the largest amounts of lead emissions. Lead has the potential to cause gastrointestinal, central nervous system, kidney, and blood diseases upon prolonged exposure. Lead is also classified as a probable human carcinogen. Because emissions of lead are found only in projects that are permitted by the local air district and are generally large manufacturing facilities, lead is not an air quality concern for the project.

5.4.1.4 Toxic Air Contaminants/Diesel Particulate Matter

Hazardous air pollutants, also known as TACs or air toxics, are those pollutants that are known or suspected to cause cancer or other serious health effects, such as reproductive effects or birth defects, or adverse environmental effects. Examples of toxic air pollutants include:

- benzene, which is found in gasoline;
- perchloroethylene, which is emitted from some dry-cleaning facilities; and
- methylene chloride, which is used as a solvent.

Transportation-related emissions are focused on particulate matter constituents within diesel exhaust and TAC constituents that comprise a portion of total organic gas (TOG) emissions from both diesel and gasoline fueled vehicles. Diesel engine emissions are comprised of exhaust particulate matter and TOGs, which are collectively defined as Diesel Particulate Matter (DPM). DPM and TOG emissions from both diesel and gasoline fueled vehicles are typically composed of carbon particles and carcinogenic substances including polycyclic aromatic hydrocarbons, benzene, formaldehyde, acetaldehyde, acrolein, and 1,3-butadiene. Diesel exhaust also contains gaseous pollutants, including volatile organic compounds and NO_x.

5.4.1.2 San Diego Air Basin Attainment Status

The SDAPCD is required to monitor air pollutant levels to ensure that air quality standards are met and, if they are not met, to develop strategies to meet the standards. Depending on whether the standards are met or exceeded, the local air basin is classified as being in “attainment” or “non-attainment.” San Diego County is listed as a Federal non-attainment area for ozone (eight-hour) and a State non-attainment area for ozone (one-hour and eight-hour standards), PM₁₀, and PM_{2.5}. As shown in Table 5.4-1, *San Diego Air Basin Federal and State Attainment Status*, the SDAB is in attainment for the State and Federal standards for NO₂, CO, SO₂, and lead.

5.4.1.3 Monitored Air Quality

The SDAPCD monitors air quality conditions at locations throughout the SDAB. The purpose of the monitoring stations is to measure ambient concentrations of pollutants, including criteria pollutants,

ozone precursors and TACs, and to determine whether the California Ambient Air Quality Standards (CAAQS) and NAAQS are met. The monitors closest to the project site are the San Diego Sherman Elementary School and the Chula Vista monitoring stations, located approximately three miles south and 9.3 miles south of the project site, respectively. The Sherman Elementary monitoring site only has 2019 data for ozone, so the 2017 and 2018 data for ozone, PM₁₀, and PM_{2.5} and the 2019 data for PM₁₀ and PM_{2.5} are from Chula Vista monitoring station. A summary of the data recorded at the two monitoring stations from 2017 through 2019 is presented in Table 5.4-2, *Ambient Air Background Pollutant Concentrations*.

5.4.2 Regulatory Framework

Air pollutants are regulated at the national, State, and air basin level; each agency has a different degree of control. The EPA regulates at the national level; the CARB regulates at the State level; and the SDAPCD regulates air quality in San Diego County.

5.4.2.1 Federal

Clean Air Act

The Federal and State governments have been empowered by the Federal and State CAA to regulate the emission of airborne pollutants and have established ambient air quality standards for the protection of public health. The EPA is the Federal agency designated to administer national air quality regulations, while CARB is the State equivalent in the California Environmental Protection Agency (CalEPA). Local control over air quality management is provided by CARB through multi-county and county-level APCDs.

Air quality is defined by ambient air concentrations of specific pollutants identified by the EPA to be of concern with respect to health and welfare of the general public. The EPA is responsible for enforcing the Federal CAA of 1970 and its 1977 and 1990 Amendments. The CAA required the EPA to establish the NAAQS, which identify concentrations of pollutants in the ambient air below which no adverse effects on the public health and welfare are anticipated. Federal standards are summarized in Table 5.4-3, *National and State Ambient Air Quality Standards*. The Federal "primary" standards have been established to protect the public health. The Federal "secondary" standards are intended to protect the nation's welfare and account for air pollutant effects on soil, water, visibility, materials, vegetation, and other aspects of the general welfare.

5.4.2.2 State

California Air Resources Board

CARB establishes statewide air quality standards and is responsible for the control of mobile emission sources, while the local APCDs are responsible for enforcing standards and regulating

stationary sources. CARB has established 15 air basins statewide. The City of San Diego is located in the SDAB, which is under the jurisdiction of the SDAPCD.

CARB, which became part of the CalEPA in 1991, is responsible for ensuring implementation of the California CAA, meeting State requirements of the Federal Clean Air Act and establishing CAAQS. It is also responsible for setting emission standards for vehicles sold in California and for other emission sources such as consumer products and certain off-road equipment. CARB also established passenger vehicle fuel specifications and oversees the functions of local air pollution control districts and air quality management districts, which in turn administer air quality activities at the regional and county level. The California CAA is administered by CARB at the State level and by the Air Quality Management Districts at the regional level. State standards are also included in Table 5.4-3.

CARB is the State regulatory agency with authority to enforce regulation to both achieve and maintain air quality in the state. CARB is responsible for the development, adoption, and enforcement of the State's motor vehicle emissions program, as well as the adoption of the CAAQS. CARB also reviews operations and programs of the local air districts and requires each air district with jurisdiction over a non-attainment area to develop its own strategy for achieving the NAAQS and CAAQS. The California CAA provides the State with the ability to adopt ambient air quality standards and other regulations provided they are at least as stringent Federal standards, or more stringent.

Through the CAA, CARB has established the CAAQS for six criteria air pollutants also regulated by the NAAQS, and also has established CAAQS for additional pollutants, including sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles. The SDAB is currently classified as a non-attainment area under the CAAQS for O₃, PM₁₀, and PM_{2.5}. It should be noted that CARB does not differentiate between attainment of the one-hour and eight-hour CAAQS for O₃; therefore, if an air basin records an exceedance of either standard, the area is considered non-attainment for the CAAQS for O₃. The SDAB has recorded exceedances of both the one-hour and eight-hour CAAQS for O₃.

State Implementation Plan/ Regional Air Quality Strategy

The Federal Clean Air Act Amendments (CAAA) mandate that states submit and implement a State Implementation Plan (SIP) for areas not meeting air quality standards. SIPs are comprehensive plans that describe how an area will attain Federal and State ambient air quality standards. SIPs are a compilation of new and previously submitted plans, programs (i.e., monitoring, modeling and permitting programs), district rules, State regulations, and Federal controls and include pollution control measures that demonstrate how the standards will be met through those measures.

State law makes CARB the lead agency for all purposes related to the SIP. Local air districts and other agencies prepare SIP elements and submit them to CARB for review and approval. CARB forwards SIP revisions to the Federal EPA for approval and publication in the Federal Register.

Thus, the RAQS and Air Quality Management Plan (AQMP) prepared by SDAPCD has become part of the SIP as the material relates to efforts ongoing in San Diego to achieve the Federal and State ambient air quality standards. The most recent SIP element for San Diego County was submitted in November 2020. The document defines the plan for attaining the NAAQS for ozone in San Diego County.

The San Diego RAQS was developed pursuant to California CAA requirements. The RAQS was initially adopted in 1991 and was updated most recently in 2016. The RAQS identifies feasible emission control measures to provide progress in San Diego County toward attaining the State ozone standard. The pollutants addressed in the RAQS are VOCs and NO_x, precursors to the photochemical formation of ozone (the primary component of smog). At present, no attainment plan for PM₁₀ or PM_{2.5} is required by the State regulations; however, SDAPCD has adopted measures to reduce particulate matter in San Diego County. These measures range from regulation against open burning to incentive programs that introduce cleaner technology.

The RAQS relies on information from CARB and SANDAG, including mobile and area source emissions, as well as information regarding projected growth in the County, to estimate future emissions and then determine strategies necessary for the reduction of emissions through regulatory controls. CARB mobile source emission projections and SANDAG growth projections are based on population and vehicle trends as well as land use plans developed by the cities and the County as part of the development of the individual General Plans. As such, projects that propose development consistent with the growth anticipated by the General Plans would be consistent with the RAQS. In the event that a project would propose development that is less dense than anticipated within the General Plan, the project would likewise be consistent with the RAQS. If a project proposes development that is greater than that anticipated in the General Plan and SANDAG's growth projections, the project might conflict with the RAQS and SIP and, thus, have a potentially significant impact on air quality.

Under State law, the SDAPCD is required to prepare an AQMP for pollutants for which the SDAB is designated non-attainment. Each iteration of the SDAPCD's AQMP is an update of the previous plan and has a 20-year horizon. Currently the SDAPCD has implemented a 2012 eight-hour National Ozone Implementation/Maintenance Plan, a 2007 eight-hour Ozone Plan, and a 2004 Carbon Monoxide Plan. The SDAPCD adopted the 2008 eight-hour Ozone Attainment Plan for San Diego County; CARB adopted the ozone plan as a revision to the California SIP.

5.4.2.3 Local

San Diego County Air Pollution Control District

The SDAPCD was created to protect the public from the harmful effects of air pollution, achieve and maintain air quality standards, foster community involvement and develop and implement cost-

effective programs that meet State and Federal mandates while considering environmental and economic impacts.

Specifically, the SDAPCD is responsible for monitoring air quality and planning, implementing, and enforcing programs designed to attain and maintain State and Federal ambient air quality standards in the district. Programs developed include air quality rules and regulations that regulate stationary source emissions, including area sources, point sources, and certain mobile source emissions. The SDAPCD is also responsible for establishing permitting requirements for stationary sources and ensuring that new, modified or relocated stationary sources do not create net emissions increases; and thus, are consistent with the region's air quality goals. The SDAPCD provides significance thresholds in Regulation II, Rule 20.2, Table 20-2-1, Air Quality Impact Assessment (AQIA) Trigger Levels. These trigger levels were established for stationary sources of air pollution and are commonly used for environmental evaluations. The SDAPCD enforces air quality rules and regulations through a variety of means, including inspections, educational or training programs, or fines, when necessary.

5.4.2.4 Toxic Air Contaminants

TACs are controlled under a different regulatory process than criteria pollutants. Because no safe level of emissions can be established for TACs region-wide, the regulation of TACs is based on the levels of cancer risk and other health risks posed to person who may be exposed. Joint Federal, State, and local regulations aimed at lessening public exposure to TACs are constantly revisited and updated.

Under Federal law, 188 substances are listed as hazardous air pollutants (HAPs) that are TACs. Major sources of specific HAPs are subject to the requirements of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) program. The EPA establishes regulatory schemes for specific source categories and requires implementation of Maximum Achievable Control Technologies (MACTs) for major sources of HAPs in each source category.

State law has established the framework for California's TAC identification and control program, which is generally more stringent than the Federal program, and is aimed at HAPs that are a concern in California. The State has formally identified more than 200 substances as TACs and has adopted appropriate control measures for each.

Once adopted at the State level, each air district is required to adopt a measure that is equally or more stringent. In addition, the California Air Toxics "Hot Spots" Information and Assessment Act (AB 2588) enacted in 1987 requires certain applicable facilities in San Diego County to quantify the emissions of TACs, and in some cases, conduct an HRA, and to notify the public, while developing risk reduction strategies. In San Diego County, SDAPCD Rule 1210 implements the public notification and risk reduction requirements of AB 2588 and requires facilities to reduce risks to acceptable

levels within five years. In addition, SDAPCD Rule 1200 establishes acceptable risk levels, and emission control requirements for new and modified facilities that may emit TACs

5.4.2.5 Odors

The California Health and Safety Code (CHSC) Sections 41700 and 41705 and SDAPCD Rule 51 (commonly referred to as public nuisance law) prohibit emissions from any source whatsoever in such quantities of air contaminants or other material, which cause injury, detriment, nuisance, or annoyance to the public health or damage to property. The provisions of these regulations do not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals. It is generally accepted that the considerable number of persons requirement in Rule 51 is normally satisfied when 10 different individuals/households have made separate complaints within 90 days. Odor complaints from a “considerable” number of persons or businesses in the area would be considered to constitute a significant, adverse odor impact.

The SDMC also addresses odor impacts in Chapter 14, Article 2, Division 7 Section 142.0710, “Air Contaminant Regulations,” which states: Air contaminants including smoke, charred paper, dust, soot, grime, carbon, noxious acids, toxic fumes, gases, odors, and particulate matter, or any emissions that endanger human health, cause damage to vegetation or property, or cause soiling shall not be permitted to emanate beyond the boundaries of the premises upon which the use emitting the contaminants is located.

5.4.3 Impact Analysis

5.4.3.1 Issue 1

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

Impact Threshold

As previously disclosed, the following analysis is based on the *Air Quality Technical Report* prepared for the project by BlueScape Environmental, dated June 8, 2022, included as Appendix E.

The SDAPCD is required, pursuant to the Federal CAA, to reduce emissions of criteria pollutants for which the SDAB is in nonattainment. Strategies to achieve these emissions reductions are developed in the RAQS and SIP, prepared by the APCD for the region.

The CARB mobile source emission projections and SANDAG growth projections that are used to develop the RAQS and SIP are based on population and vehicle trends and land use plans developed by the cities and by the County. As such, projects that propose development that is consistent with or propose less density than the growth anticipated by local community or general plans would be consistent with the RAQS. If a project proposes development that is greater than that anticipated in

the local plan and SANDAG's growth projections upon which the RAQS is based, the project would be in conflict with the RAQS and SIP and may have a potentially significant impact on air quality. This situation would warrant further analysis to determine if the project and the surrounding projects exceed the growth projections used in the RAQS for the specific subregional area.

Analysis

Conformance with the RAQS and SIP determines whether a project would conflict with or obstruct implementation of the applicable air quality plans. The RAQS relies on information from CARB and SANDAG, including projected growth in the County, mobile, area, and all other source emissions to project future emissions and determine from that the strategies necessary for the reduction of stationary source emissions through regulatory controls. Projects that propose development that is consistent with the growth anticipated by the General Plan are consistent with the SIP, AQMP, and RAQS.

The project involves demolition of some existing buildings and construction of new medical offices and hospital buildings at the Scripps Mercy Hospital Campus in the Uptown community of the City of San Diego. The project site is located in the Medical Complex Neighborhood of the Uptown Community Plan and is designated Institutional, Community Commercial: 0-109 Du/Ac, and Open Space. The site is designated Institutional & Public and Semi-Public Facilities; Multiple Use; and Parks, Recreation, and Open Space in the General Plan.

The project is consistent with the General Plan, which identifies the site as Institutional, Public, and Semi-Public Facilities; Park, Open Space, and Recreation; and Multiple Use. Additionally, the project is consistent with the Uptown Community Plan, which designates the project site for Institutional, Community Commercial, and Open Space uses. As has been previously described, the project site contains developed and undeveloped portions. The developed portion of the hospital campus is located in the Institutional and Community Commercial: 0-109 Du/Ac land use designated areas; vegetated slopes void of development within the project site are located in the Open Space land use designated area. The project proposes no redevelopment in the Open Space-designated portions of the site. Within the Institutional- and Community Commercial-designated portions of the site, development would include hospital buildings, medical office buildings, and support buildings, which is consistent with the Community Plan land use designations.

The project is zoned CC-3-8 and CC-3-9 (Commercial--Community zones), RM-3-9 (Multi-Family Residential), as well as the OC-1-1 (Open Space--Conservation) and OR-1-1 (Open Space--Residential). Redevelopment of the site would occur in the CC-3-8 and CC-3-9 zones, both of which allow hospitals with the application of a CUP. The project does not propose any new development in the Rm-3-9, OC-1-1 and OR-1-1 zones. The project has been designed to comply with the regulations of the LDC to the extent possible; however, implementation of the project in a manner that maximizes efficiency of the site would require deviations for building height, floor area ratio, and driveways as shown in Table 5.1-3, *Deviations Summary*. The deviations are necessary to allow the site to be developed consistent with the intent of the Uptown Community Plan.

The project is consistent with the City's General Plan and the Uptown Community Plan. As such, the project would not cause or contribute to a conflict with the AQMP, RAQS or SIP and, therefore, would not obstruct implementation of these air quality plans. Impacts relative to compliance with implementation of applicable air quality plans would be less than significant.

Significance of Impacts

Because the project is consistent with the Uptown Community Plan and, therefore, the growth anticipated by the General Plan, the project would be consistent with the SIP, AQMP, and RAQS. Therefore, the project would not conflict with or obstruct implementation of any applicable air quality plans. Impacts would be less than significant.

Mitigation Measures

Mitigation would not be required.

5.4.3.2 Issue 2 and Issue 3

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

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

Impact Threshold

A significant adverse air quality impact may occur when a project individually or cumulatively interferes with progress toward the attainment of the ozone standard by generating emissions that equal or exceed the established long-term quantitative thresholds for pollutants or exceed a Federal or State ambient air quality standard for any criteria pollutant.

The SDAPCD has established thresholds in Rule 20.2 for new or modified stationary sources. With the exception of VOCs and PM_{2.5} thresholds, the City of San Diego screening quantities shown in the CEQA Significance Determination Thresholds Table A-2 incorporate screening level thresholds from Rule 20.2 for determining air quality impacts. The City does not show a standard for PM_{2.5} but does include a threshold for ROG/VOC emissions. The EPA uses the term VOC and CARB's Emission Inventory Branch (EIB) uses the term Reactive Organic Gases to essentially define the same thing. There are minor deviations between compounds that define each term, but are assumed to be equivalent due to the fact that the South Coast Air Quality Management District (SCAQMD) interchanges these words and because air quality models directly calculate ROG in place of VOC. Also, since SDAPCD does not have air quality impact thresholds for VOCs, it is acceptable to use the Monterey Bay Air Resources District (MBARD) ROG threshold from the SCAQMD.

Should emissions be found to exceed these thresholds, additional computer dispersion modeling can be used to demonstrate that the project's total air quality impacts are below the Federal and

State ambient air quality standards. The daily construction and operational emission thresholds for pollutants evaluated are as follows:

- ROG – 137 pounds (lbs)/day;
- NO_x – 250 lbs/day;
- CO – 550 lbs/day;
- SO_x – 250 lbs/day;
- PM₁₀ – 100 lbs/day; and
- PM_{2.5} - 67 lbs/day.

The annual operational emission thresholds for pollutants evaluated are as follows:

- ROG – 15 tons/year;
- NO_x – 40 tons/year;
- CO – 100 tons/year;
- SO_x – 40 tons/year;
- PM₁₀ – 15 tons/year; and
- PM_{2.5} – 10 tons/year.

Analysis

Construction Emissions

As referenced, construction activities would include demolition of select existing buildings, grading, construction of the buildings/utilities and related improvements, as well as paving areas for parking and parking structures. Construction activities would require the use of equipment that would generate criteria air pollutant emissions. For modeling purposes, it was assumed that all construction equipment used would be diesel-powered. Construction emissions associated with development of the project were quantified by estimating the types of equipment, including the number of individual pieces of equipment, that would be used on-site during each of the construction phases as well as off-site haul trips to remove demolition debris. Construction emissions were analyzed using the regional thresholds established by the SDAPCD and published within the City Thresholds Guidelines. Emissions modeling also accounts for the use of low-VOC paint (50 g/L for interior coatings and 100 g/L for exterior coatings) as required by SDAPCD Rule 67.

Project construction would generate temporary air pollutant emissions. These impacts are associated with fugitive dust (PM₁₀ and PM_{2.5}) from soil disturbance and exhaust emissions (NO_x, CO, and SO₂) from heavy construction vehicles. Table 5.4-4, *Construction Schedule for the Scripps Mercy Hospital Project*, shows the expected schedule for the construction phases for each of the planned demolition activities and facility expansion, improvements, and structures at the site.

Demolition, site preparation, and grading would involve the greatest concentration of heavy equipment use and the highest potential for fugitive dust emissions. The project would be required

to comply with SDAPCD Rule 55, which identifies fugitive dust standards and is required to be implemented at all construction sites located within the SDAB. Therefore, the following standard conditions, which are required to reduce fugitive dust emissions, were included in emissions modeling for site preparation and grading phases of construction:

- 1. Minimization of Disturbance.** Construction contractors should minimize the area disturbed by clearing, grading, earth moving, or excavation operations to prevent excessive amounts of dust.
- 2. Soil Treatment.** Construction contractors should treat all graded and excavated material, exposed soil areas and active portions of the construction site, including unpaved on-site roadways to minimize fugitive dust. Treatment shall include, but not necessarily be limited to, periodic watering, application of environmentally safe soil stabilization materials, and/or roll compaction as appropriate. Watering shall be done as often as necessary, and at least three times daily, preferably at the start of each morning and after work is done for the day. For modeling purposes, it was assumed that watering would occur three times daily, during the construction of this development.
- 3. Soil Stabilization.** Construction contractors should monitor all graded and/or excavated inactive areas of the construction site at least weekly for dust stabilization. Soil stabilization methods, such as water and roll compaction, and environmentally safe dust control materials shall be applied to portions of the construction site that are inactive for over four days. If no further grading or excavation operations are planned for the area, the area shall be seeded and watered until landscape growth is evident, or periodically treated with environmentally safe dust suppressants, to prevent excessive fugitive dust.
- 4. No Grading During High Winds.** Construction contractors should stop all clearing, grading, earth moving, and excavation operations during periods of high winds (20 miles per hour or greater, as measured continuously over a one-hour period).
- 5. Street Sweeping.** Construction contractors should sweep all on-site driveways and adjacent streets and roads at least once per day, preferably at the end of the day, if visible soil material is carried over to adjacent streets and roads.

Construction is assumed to begin in the Fall of 2022. Table 5.4-5, *Project Maximum Daily Construction Emissions*, summarizes the estimated maximum daily emissions of pollutants occurring during the construction period (conservatively assuming completion by 2030), with a comparison of each year's daily impacts to the SDAPCD Rule 20.2 screening thresholds. As shown in Table 5.4-5, construction of the proposed project would exceed the SDAPCD regional construction emission thresholds for daily emissions for NOx.

The project maximum daily construction NO_x emissions for Hospital I and II were conservatively modeled under a combined construction component from 2024 through 2028. However, construction of Hospital II is scheduled to be at the end of the project and most likely would be constructed from 2034 to 2038. By adjusting the allocation of emissions to be associated with separate construction components for Hospital I and II, the daily construction emissions would be reduced by over 26 percent in 2024. Therefore, the estimated maximum NO_x emissions for all periods would be below the screening threshold and additional mitigation for NO_x emissions would not be required.

Operational Emissions

Operational emissions include emissions from electricity consumption (energy sources), vehicle trips (mobile sources), area sources, landscape equipment, and evaporative emissions as structures are repainted over the life of the project. The majority of operational emissions are associated with vehicle trips to and from the project site.

As part of the project, the Central Energy Plant Expansion may include replacing older equipment or adding new stationary source equipment, including boilers, chillers, or emergency backup engines. Such equipment would be required to meet SDAPCD Best Available Control Technology, or the cleanest achievable emission standards for new equipment. The operational emission changes due to the expansion would not be expected to contribute significant air emissions at levels that would conflict with air quality standards. In fact, these equipment changes may lead to reduced air emissions at the project site.

The CalEEMod modeling for operational emissions considered the project design conditions listed in the CAP Consistency Checklist. These project design conditions that must be incorporated into the project are listed below. According to the CAP Consistency Checklist, the project would implement a TDM Program that would include the following project design conditions used to reduce emissions:

- Provide a 30 percent subsidy (which is approximately \$1.00 per day per employee for the current monthly pass of \$72.00) toward transit passes for MTS Bus, Trolley, or COASTER trains for employees to promote transit usage. Additionally, the project would allow transit passes to be purchased on a pre-tax basis through payroll deduction.
- Offering a carpool program to employees and preferred parking spaces (designated) for employees that self-select to carpool with other employees;
- Maintaining an employer network in the SANDAG iCommute program and promoting its RideMatcher service to its employees;
- Provide a \$30.00 per month discount for employees using van pools. The program benefits both employees and the environment by contributing to a work-life balance, as well as reducing greenhouse gas emissions. Participants can save even more money by paying for monthly van pool lease costs on a pre-tax basis;
- Offering flexible and alternative work hours;

- Offering virtual doctor and urgent care visits, which allow doctors to work remotely and patients not needing to drive to appointments;
- Install TDM information Boards in the hospital and MOB lobbies;
- Upgrade the existing bus stop on Washington Street and Fifth Avenue (Stop ID 11243) to add a shelter and maps/way finding signs;
- Offering employees of Scripps Health “work at home” options via Telecommuting, Telemedicine, CDIS, or other approved programs shifting up to five percent of the workforce to working remotely for one or more days per week; and
- Access to services that reduce the need to drive, such as cafes, commercial stores, banks, post offices, restaurants, gyms, and childcare, within 1,320 feet (1/4 mile) of the hospital campus.

Table 5.4-6, *Project Maximum Daily Operational Emissions with Project Conditions*, summarizes the modeled project maximum daily emissions, with project design features, associated with operation of the proposed project. The emissions are based upon the conservative project build-out year of 2030, with consideration of project emission reductions that will occur when existing site buildings are demolished. The updated traffic study, *Transportation Impact Analysis for Scripps Mercy Hospital* (LLG Engineers 2021) was used to determine the overall project-related net changes in operational vehicle trips. The existing hospital building, the medical office building at 550 Washington Street and the Behavioral Health Clinic would be demolished, removing 6,993 ADT from the CUP baseline. The new construction of Hospital I and II and MOB would increase vehicle trips by 10,340 ADT and 22,750 ADT, respectively. The Hospital I and II and MOB buildings would not be occupied until construction has been completed. Then existing buildings would be demolished. The overall net change in ADT due to the project would be 26,097 ADT. The area and energy-related emission reductions from demolished buildings were based upon similar assumptions as newly constructed buildings, without any design features or mitigation applied. The emission reductions from demolition of Mercy Manor and the Generator Building were not considered due to minimal changes in net operational emissions. As shown in Table 5.4-6, the project maximum daily operational emissions would not exceed the SDAPCD thresholds for any of the pollutants, ROG, NO_x, CO, SO_x, PM₁₀ or PM_{2.5}. Table 5.4-7, *Project Maximum Annual Operational Emissions with Project Conditions*, summarizes the modeled project maximum annual emissions, with project design features, associated with operation of the proposed project. The emissions are based upon the conservative project build-out year of 2030, with consideration of project emission reductions that would occur when existing site buildings are demolished, as discussed above. As shown in Table 5.4-7, the project maximum annual emissions would not exceed the SDAPCD thresholds for any of the pollutants, ROG, NO_x, CO, SO_x, PM₁₀ or PM_{2.5}. Air quality impacts related to operational emissions would be less than significant.

Significance of Impacts

Construction of the proposed project would not exceed the SDAPCD regional daily and annual construction emission thresholds for criteria pollutant emissions, or expose receptors to substantial

pollutant concentrations Air quality impacts related to construction emissions would be less than significant.

Emissions of all criteria pollutants from project operation are below all applicable daily and annual screening thresholds of significance. Therefore, air quality impacts related to operational emissions would be less than significant.

Mitigation Measures

No mitigation measures are required.

5.4.3.3 Issue 4

Issue 4 Would the project create objectionable odors affecting a substantial number of people?

Impact Threshold

Per the City's Thresholds, determining the significance of potential odor impacts should be based on what is known about the quantity of the odor compound(s) that would result from the project's proposed use(s), the types of neighboring uses potentially affected, the distance(s) between the project's point source(s) and the neighboring uses such as sensitive receptors, and the resultant concentration(s) at receptors.

For a project proposing placement of sensitive receptors near an existing odor source, a significant odor impact will be identified if the project site is closer to the odor source than any existing sensitive receptor where there has been more than one confirmed or three confirmed complaints per year (averaged over a three-week period) about the odor source. Projects proposing placement of sensitive receptors near a source of odors where there are currently no nearby existing receptors, the determination of significance should be based on the distance and frequency at which odor complaints from the public have occurred in the vicinity of a similar odor source at another location.

Analysis

Figure 5.4-1, *Locations of Nearest Sensitive Receptors*, shows where the residential and sensitive receptors are located relative to the project site. The nearest identified sensitive receptors to the project site are the Select Specialty Hospital, which is across Washington Street to the south of the project site; the Warwick apartment building, located immediately to the east of the project site; Florence Elementary School, located approximately 0.17 mile southwest of the project site; and Green Beans Preschool, located approximately 0.19 mile southwest of the project site.

The project would involve the use of diesel-powered construction equipment. Diesel exhaust may be noticeable temporarily at adjacent properties; however, construction activities would be temporary and are not considered significant. Furthermore, any odors emitted during construction would be short-term, and intermittent in nature, and would cease upon the completion of the respective

phase of construction. Thus, the project would not create objectionable odors affecting a substantial number of people during construction, and impacts would be less than significant. The project does not include industrial or agricultural uses that are typically associated with objectionable odors. Furthermore, the project would be required to comply with SDAPCD Rule 51, which prohibits the discharge of odorous emissions that would create a public nuisance. Therefore, impacts associated with objectionable odors would be less than significant.

Significance of Impacts

The project would not result in significant air quality impacts associated with odors.

Mitigation Measures

Mitigation would not be required.

5.4.3.4 Issue 5

Issue 5 Would the project result in exposing sensitive receptors to substantial pollutant concentrations?

Impact Threshold

Based on the City's Threshold, a project would have a potentially significant air quality environmental impact if it would:

- Expose sensitive receptors to substantial pollutant concentrations including air toxics such as diesel particulates.
- Result in a CO hotspot.

The City's Thresholds require a project applicant to assess whether the project would expose sensitive receptors to substantial pollutant concentrations. Sensitive receptors are defined as long-term health care facilities, rehabilitation centers, convalescent centers, retirement homes, residences (such as medical patients in homes), schools, playgrounds, and child care centers.

The City's thresholds guidance does not provide significance thresholds to evaluate health risk impacts. However, SDAPCD Rule 1200(d) provides risk thresholds for new projects:

- An excess lifetime cancer risk level of more than 10 in one million; or
- A chronic hazard index (HI) greater than 1.0; or
- An acute HI greater than 1.0.

Non-criteria pollutants such as HAPs or TACs are also regulated by the SDAPCD. Rule 1200 (Toxic Air Contaminants – New Source Review) adopted on June 12, 1996, requires evaluation of potential health risks for any new, relocated, or modified emission unit which may increase emissions of one

or more toxic air contaminants. The rule requires that projects that propose to increase cancer risk to between 1 and 10 in one million need to implement toxics best available control technology (T-BACT) or impose the most effective emission limitation, emission control device or control technique to reduce the cancer risk. At no time shall the project increase the incremental cancer risk to over 10 in one million or a health hazard index (chronic and acute HI) greater than one. Projects creating cancer risks less than one in one million are not required to implement T-BACT technology.

Analysis

The Air Quality Technical Report (BlueScape, March 25, 2021) prepared for the project includes an HRA to determine if the project would result in health risk impacts from diesel exhaust due to construction activities at the site. These risk thresholds presented under *Impact Thresholds* above were used as the significance thresholds to review health risk impacts from DPM emissions due to project construction on off-site residences and sensitive receptor locations. Project construction activities in each component include such activities as site grading, building, and paving operations. Emissions of TACs due to operations at the newly constructed buildings are estimated to be much lower than the emissions due to construction activities; therefore, only the health risk from construction equipment diesel exhaust – specifically DPM was analyzed. The health risk analysis summarized below evaluates the excess lifetime cancer risks and the noncancer chronic and acute impacts that could be attributable to the DPM emissions due to construction of the project on off-site residents and sensitive receptors.

The City's Threshold requires a project applicant to assess whether the project will expose sensitive receptors to substantial pollutant concentrations. The HRA evaluates potential risk to residence locations near the project site. Receptors were placed at ten of the closest off-site residential locations (such as the Warwick apartments and the house on Bathhouse Row) and at three of the closest off-site sensitive receptor locations (Select Specialty Hospital, Florence Elementary School, and Green Beans Daycare Center), as shown on Figure 5.4-1.

Cancer, chronic, and acute risks due to exposure to diesel exhaust emissions were calculated for the nearest resident and sensitive receptor for each modeling scenario/source. Exposure to diesel exhaust was assumed to occur 10 hours/day, 7 days/week, for the projected duration of the 25-year construction/demolition activities. For cancer risk calculations, the 25-year average construction DPM emission rate was further averaged into 30-years, and the duration of resident and sensitive receptor exposure was assumed to occur over a 30-year lifetime. For chronic risk calculations, average annual emissions over the 25-year construction period were used. For acute risk calculations, maximum hourly emissions were used, with acute risk results for the most impacted target organ reported. Cancer and noncancer risk results are presented in Table 5.4-8, Health Risk Results from Construction DPM Emissions.

As shown in Table 5.4-8, the noncancer chronic and acute risks due to construction of the project are below the SDAPCD CEQA thresholds. The cancer risk, however, exceeds the SDAPCD CEQA thresholds, which is considered a significant impact.

Carbon Monoxide Hotspots

Carbon monoxide is a colorless, odorless, poisonous gas that may be found in high concentrations near areas of high traffic volumes. CO emissions are a function of vehicle idling time, meteorological conditions, and traffic flow. The SDAB is in attainment of State and Federal CO standards. The El Cajon monitoring site is the closest monitoring station to the project site that provides CO data. The maximum eight-hour average CO level recorded in 2019 was 1.0 ppm. Concentrations are below the 20-ppm State and 35-ppm Federal one-hour standards, respectively.

Although CO is not a regional air quality concern in SDAB, elevated CO levels can occur at or near intersections that experience severe traffic congestion. A localized air quality impact is considered significant if the additional CO emissions resulting from the project create a “hotspot” where the California one-hour standard of 20.0 ppm or the eight-hour standard of nine ppm is exceeded. This can occur at severely congested intersections during cold winter temperatures. Screening for elevated CO levels is recommended for severely congested intersections exceeding LOS E or F with project traffic where a significant traffic impact may occur. Specifically, project-related traffic that would worsen the LOS at intersections operating at LOS E or F would be subject to a detailed evaluation. If not, no further review is necessary.

The LMA prepared for the project indicated that there are location where the project adds traffic to intersections at LOS E or F, but project design features are proposed to address these locations. The design features are anticipated to improve the flow of additional traffic at LOS E and F intersections. Since the project-related traffic would not worsen the LOS at intersections operating at LOS E or F. In addition, traffic improvements would be made to allow better traffic flow. Therefore, the project is anticipated to have a less than significant transportation impact. As such, receptors would not be exposed to additional pollutant concentrations related to CO hotspots. No further evaluation with respect to CO hotspots is required. The project would result in a less than significant impact relative to CO hotspots.

Significance of Impacts

Cancer risk due to construction of the project exceeds the SDAPCD CEQA thresholds. Non-cancer chronic and acute impacts due to construction of the project are below the SDAPCD CEQA thresholds. The project would result in a less than significant impact relative to CO hotspots.

Mitigation Measures

Potential cancer risks for the nearest resident and sensitive receptor to diesel exhaust emissions due to project construction activities would be reduced to below a level of significance with incorporation of mitigation measure MM 5.4-1, which helps to reduce cancer risk impacts from DPM.

MM 5.4-1: Diesel Exhaust Emissions Reduction. During construction activities, efforts shall be made to reduce diesel exhaust emissions from all construction equipment greater than 100 hp with use of Tier 4 Interim or better equipment, including equipment with an installed diesel

particulate filter (DPF), where feasible, and by use of other emission reduction practices. Construction equipment that is certified less than Tier 4 Interim may only be used if unavailable from vendors, in which case equipment with DPFs installed shall be used whenever possible. Additionally, measures shall be employed to reduce DPM emissions, that may include, but would not be limited to, reduction in the number and/or horsepower rating of construction equipment, limiting the number of daily construction haul truck trips to and from the proposed project using cleaner vehicle fuel, and/or limiting the number of individual construction project components occurring simultaneously.

A qualified air quality monitor shall be on-site during grading and demolition phases to confirm that construction equipment greater than 100 hp employs Tier 4 Interim or better equipment and that construction equipment that is certified less than Tier 4 Interim is being used only where Tier 4 Interim equipment is unavailable from vendors. When such equipment is being used, such equipment shall be installed with DPFs whenever possible. The monitor shall also determine the need to be on-site during construction, if multiple construction equipment with larger engines is planned for use at the same time.

These measures would be used to ensure that health risk impacts from construction do not exceed significance levels.

Significance of Impacts after Implementation of Mitigation Measures

Table 5.4-9, *Health Risk Results from Construction DPM Emissions with Mitigation*, shows the cancer risk calculated for the nearest residents and sensitive receptors with all construction off-road equipment meeting Tier 4 Interim standards or better with DPFs installed. With the implementation of mitigation measure MM 5.4-1, the cancer risk impacts are below the SDAPCD CEQA threshold. Therefore, implementation of mitigation measure MM 5.4-1 would reduce cancer risk due to construction emissions to below the level of significance.

Table 5.4-1. San Diego County Federal and State Attainment Status

Criteria Pollutant	Federal Designation	State Designation
Ozone (1-hour)	Attainment*	Non-Attainment
Ozone (8-hour)	Non-Attainment	Non-Attainment
Carbon Monoxide	Attainment	Attainment
PM₁₀	Unclassifiable**	Non-Attainment
PM_{2.5}	Attainment	Non-Attainment
Nitrogen Dioxide	Attainment	Attainment
Sulfur Dioxide	Attainment	Attainment
Lead	Attainment	Attainment
Sulfates	No Federal Standard	Attainment
Hydrogen Sulfide	No Federal Standard	Unclassified
Visibility	No Federal Standard	Unclassified

*The Federal 1-hour standard of 12 ppm was in effect from 1979 through June 1, 2005. The revoked standard is referenced here because it was used for such a long period and because this benchmark is addressed in SIPs.

**At the time of designation, if the available data does not support a designation of attainment or non-attainment, the area is designated as unclassifiable.

Table 5.4-2. Ambient Air Background Pollutant Concentrations

Pollutant	2017	2018	2019
Ozone (O₃)			
State maximum 1-hour concentration (ppm)	0.085	0.076	0.084
National maximum 8-hour concentration (ppm)	0.074	0.064	0.072
State maximum 8-hour concentration (ppm)	0.075	0.065	0.072
<i>Number of Days Standard Exceeded</i>			
CAAQS 1-hour (>0.09 ppm)	0	0	0
CAAQS 8-hour (>0.070 ppm)/ NAAQS 8-hour (>0.070 ppm)	1/1	0/0	1/1
Respirable Particulate Matter (PM₁₀)			
National maximum 24-hour concentration (µg/m ³)	59.0	45.0	68.2
State maximum 24-hour concentration (µg/m ³)	61.0	45.0	69.4
Annual average concentration (µg/m ³)	21.7	22.0	22.0
<i>Annual or Days Standard Exceeded*</i>			
NAAQS 24-hour (>150 µg/m ³)	0	0	0
CAAQS 24-hour (>50 µg/m ³)/ Annual (>20 µg/m ³)	1/Yes	0/Yes	1/Yes
Fine Particulate Matter (PM_{2.5})			
National maximum 24-hour concentration (µg/m ³)	42.7	41.9	18.6
State maximum 24-hour concentration (µg/m ³)	42.7	41.9	18.6
Annual average concentration (µg/m ³)	--	9.9	8.1
<i>Annual or Days Standard Exceeded*</i>			
NAAQS 24-hour (>35 µg/m ³)/Annual (>12 µg/m ³)	1 / No	1 / No	0 / No
CAAQS Annual (>12 µg/m ³)	No	No	No

Notes:

µg/m³ = micrograms per cubic meter; ppb = parts per billion; ppm = parts per million; N/A = Not available.

CAAQS = California Ambient Air Quality Standard; NAAQS = National Ambient Air Quality Standard.

BOLD value indicates greater than standard.

2019 O₃ measured at the Sherman Elementary station (450B 24th Street, approximately 3 miles south of the Project site); 2017-2018 O₃ and 2017-2019 PM₁₀ and PM_{2.5} measured at the Chula Vista monitoring station (80 E. J Street, Chula Vista, approximately 9.3 miles south of the Project site)

* In the case of an Annual standard a No or Yes response is provided.

Sources: CARB 2021; <https://www.arb.ca.gov/adam/topfour/topfourdisplay.php>

Table 5.4-3. National and State Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards ¹		National Standards ²		
		Concentration ³	Method ⁴	Primary ^{3,5}	Secondary ^{3,6}	Method ⁷
Ozone (O ₃) ⁸	1-hour	0.09 ppm (180 µg/m ³)	Ultraviolet Photometry	--	Same as Primary Standard	Ultraviolet Photometry
	8-hour	0.070 ppm (137 µg/m ³)		0.070 ppm (137 µg/m ³)		
Respirable Particulate Matter (PM ₁₀) ⁹	24-Hour	50 µg/m ³	Gravimetric or Beta Attenuation	150 µg/m ³	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	20 µg/m ³		--		
Fine Particulate Matter (PM _{2.5}) ⁹	24-Hour	--	--	35 µg/m ³	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	12 µg/m ³	Gravimetric or Beta Attenuation	12.0 µg/m ³		
Carbon Monoxide (CO) ¹⁰	1-Hour	20 ppm (23 mg/m ³)	Non-Dispersive Infrared Photometry (NDIR)	35 ppm (40 mg/m ³)	--	Non-Dispersive Infrared Photometry (NDIR)
	8-Hour	9.0 ppm (10 mg/m ³)		9 ppm (10 mg/m ³)	--	
	8-Hour (Lake Tahoe)	6 ppm (7 mg/m ³)		--	--	
Nitrogen Dioxide (NO ₂) ¹⁰	1-Hour	0.18 ppm (339 µg/m ³)	Gas Phase Chemiluminesc e	100 ppb (188 µg/m ³)	--	Gas Phase Chemiluminescence
	Annual Arithmetic Mean	0.030 ppm (57 µg/m ³)		0.053 ppm (100 µg/m ³)	Same as Primary Standard	
Sulfur Dioxide (SO ₂) ¹¹	1-Hour	0.25 ppm (655 µg/m ³)	Ultraviolet Fluorescence	75 ppb (196 µg/m ³)	--	Ultraviolet Fluorescence; Spectrophotometry (Pararosaniline Method)
	3-Hour	--		--	0.5 ppm (1300 µg/m ³)	
	24-Hour	0.04 ppm (105 µg/m ³)		0.14 ppm (for certain areas)	--	
	Annual Arithmetic Mean	--		0.030 ppm (for certain areas)	--	
Lead ^{12,13}	30-day Average	1.5 µg/m ³	Atomic Absorption	--	--	High Volume Sampler and Atomic Absorption
	Calendar Quarter	--		1.5 µg/m ³ (for certain areas)	Same as Primary Standard	
	Rolling 3-Month Average	--		0.15 µg/m ³		
Visibility Reducing Particles ¹⁴	8-Hour	--	Beta Attenuation and Transmittance through Filter Tape	No National Standards		

Pollutant	Averaging Time	California Standards ¹		National Standards ²		
		Concentration ³	Method ⁴	Primary ^{3,5}	Secondary ^{3,6}	Method ⁷
Sulfates	24-Hour	25 µg/m ³	Ion Chromatography			
Hydrogen Sulfide	1-Hour	0.03 ppm (42 µg/m ³)	Ultraviolet Fluorescence			
Vinyl Chloride ¹²	24-Hour	0.01 ppm (26 µg/m ³)	Gas Chromatography			

- California standards for ozone, carbon monoxide (except 8-hour Lake Tahoe), sulfur dioxide (1 and 24 hour), nitrogen dioxide, and particulate matter (PM10, PM2.5, and visibility reducing particles), are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.
- National standards (other than ozone, particulate matter, and those based on annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over three years, is equal to or less than the standard. For PM10, the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 µg/m³ is equal to or less than one. For PM2.5, the 24-hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard. Contact the U.S. EPA for further clarification and current national policies.
- Concentration expressed first in units which it was promulgated. Equivalent units given in parenthesis are based upon a reference temperature of 25°C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.
- Any equivalent measurement method which can be shown to the satisfaction of the ARB to give equivalent results at or near the level of the air quality standard may be used.
- National Primary Standards: The levels are of air quality necessary, with an adequate margin of safety to protect the public health.
- National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.
- Reference method as described by the U.S. EPA An "equivalent method" of measurement may be used but must have a "consistent relationship to the reference method" and must be approved by the U.S. EPA.
- On October 1, 2015, the national 8-hour ozone primary and secondary standards were lowered from 0.075 to 0.070 ppm.
- On December 14, 2012, the national annual PM2.5 primary standard was lowered from 15 µg/m³ to 12.0 µg/m³. The existing national 24-hour PM2.5 standards (primary and secondary) were retained at 35 µg/m³, as was the annual secondary standard of 15 µg/m³. The existing 24-hour PM10 standards (primary and secondary) of 150 µg/m³ also were retained. The form of the annual primary and secondary standards is the annual mean, averaged over 3 years.
- To attain the 1-hour national standard, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 ppb. Note that the national 1-hour standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the national 1-hour standard to the California standards the units can be converted from ppb to ppm. In this case, the national standard of 100 ppb is identical to 0.100 ppm.
- On June 2, 2010, a new 1-hour SO₂ standard was established and the existing 24-hour and annual primary standards were revoked. To attain the 1-hour national standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO₂ standards (24-hour and annual) remain in effect until one year after an area is designated for the 2010 standard, except that in areas designated nonattainment for the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved.
 Note that the national 1-hour standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the national 1-hour standard to the California standards the units can be converted from ppb to ppm. In this case, the national standard of 75 ppb is identical to 0.075 ppm.
- The ARB has identified lead and vinyl chloride as 'toxic air contaminant' with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.
- The national standard for lead was revised on October 15, 2008 to a rolling 3-month average. The 1978 lead standard (1.5 µg/m³ as a quarterly average) remains in effect until one year after an area is designated for the 2008 standard, except that in areas designated nonattainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.
- In 1989, the ARB converted both the general statewide 10-mile visibility standard and the Lake Tahoe 30-mile visibility standard to instrumental equivalents, which are "extinction of 0.23 per kilometer" and "extinction of 0.07 per kilometer" for the Statewide and Lake Tahoe Air Basin standards, respectively.

Table 5.4-4. Construction Schedule for the Scripps Mercy Hospital Project

	Construction Schedule	Proposed Start
1	Parking Lot 4.1 Demolition	Nov. 2022 – March 2023
2	MOB Construction	April 2023 – Dec. 2024
3	Behavioral Health Building Demolition	Oct. 2023 – March 2024
4	550 Washing Building Demolition	Jan. 2025 – July 2025
5	Hospital I and Hospital Support Building Construction	April 2024 – March 2028
6	Emergency Department Demolition	March 2029 – Oct. 2029
7	Existing Hospital Demolition	March 2029 – April 2030
8	Mercy Manor Demolition	2030
9	Central Energy Plan Expansion	2031-2032
10	Facility and Generator Building Demolition	2033
11	Hospital II Construction	2034-2038

Table 5.4-5. Project Maximum Daily Construction Emissions (lb/day)

Year	ROG	NOx	CO	SO ₂	Fug PM ₁₀	Exh PM ₁₀	Total PM ₁₀	Fug PM _{2.5}	Exh PM _{2.5}	Total PM _{2.5}
2022	11.3	7.03	7.72	0.013	0.83	0.37	1.17	0.44	0.34	0.76
2023	20.8	168	175	0.504	20.8	6.76	26.5	8.41	6.38	13.7
2024	58.3	338	370	1.006	35.2	13.2	44.2	16.1	12.5	24.6
2025	29.5	216	274	0.678	2.21	8.28	10.5	0.60	7.88	8.47
2026	27.7	202	259	0.619	1.63	7.87	9.49	0.44	7.50	7.94
2027	51.8	226	299	0.685	2.09	8.98	11.1	0.57	8.56	9.12
2028	16.0	120	151	0.355	1.38	4.63	6.01	0.38	4.41	4.78
2029	6.59	45.8	57.6	0.163	0.43	1.80	2.24	0.11	1.69	1.80
2030	7.32	24.3	56.3	0.173	0.40	0.72	1.12	0.10	0.72	0.82
Screening Threshold (lb/day)	<i>137</i>	<i>250</i>	<i>550</i>	<i>250</i>	--	--	<i>100</i>	--	--	<i>100</i>
Exceeds Threshold? (Y/N)	No	Yes	No	No	--	--	No	--	--	No

Table 5.4-6. Project Maximum Daily Operational Emissions with Project Conditions

Scripps Mercy Daily Operation Criteria Pollutant Emissions						
Hospital I and II						
Category	ROG	NOx	CO	SO₂	PM₁₀	PM_{2.5}
	Daily lb/day					
Area (Total)	7.80	4.7E-04	0.052	0	1.8E-04	1.8E-04
Energy (Natural Gas)	0.552	4.75	3.99	0.029	0.361	0.361
Mobile (Total)	10.12	40.3	103	0.407	43.7	11.8
Hospital I/II Total	18.4	45.1	107	0.435	44.0	12.2
Medical Office Building						
Category	ROG	NOx	CO	SO₂	PM₁₀	PM_{2.5}
	Daily lb/day					
Area (Total)	4.39	1.80E-0	2.01E-02	0.000	7.00E-05	7.00E-05 1.6E-04
Energy (Natural Gas)	0.100	0.91	0.77	0.005	0.069	0.069
Mobile (Total)	9.02	35.9	82.5	0.31	32.8	8.91
MOB Total	13.5	36.8	83.3	0.32	32.9	8.98
Hospital Support Building						
Category	ROG	NOx	CO	SO₂	PM₁₀	PM_{2.5}
	Daily lb/day					
Area (Total)	1.37	6.0E-05	6.5E-03	0	2.0E-05	2.0E-05
Energy (Natural Gas)	0.033	0.297	0.249	0.002	0.023	0.023
Mobile (Total)	1.25	4.98	12.4	0.049	5.21	1.41
HSB Total	2.65	5.27	12.7	0.050	5.23	1.44
Central Energy Plant Expansion Building						
Category	ROG	NOx	CO	SO₂	PM₁₀	PM_{2.5}
	Daily lb/day					
Area (Total)	0.051	0	2.4E-04	0	0	0
Energy (Natural Gas)	7.6E-04	0.007	0.006	4.0E-05	5.2E-04	5.2E-04
Mobile (Total)	0.019	0.077	0.227	0.001	0.104	0.028
CEP Total	0.070	0.083	0.233	0.001	0.105	0.029
Existing Hospital, Medical Office Building, & Behavioral Health Clinic Demolished						
Category	ROG	NOx	CO	SO₂	PM₁₀	PM_{2.5}
	Daily lb/day					
Area (Total)	(16.9)	(5.4E-04)	(0.060)	0	(2.1E-04)	(2.1E-04)
Energy (Natural Gas)	(1.02)	(9.30)	(7.82)	(0.056)	(0.707)	(0.707)
Mobile (Total)	(8.09)	(32.3)	(86.8)	(0.349)	(37.9)	(10.3)
Existing Total (to subtract)	(26.0)	(41.6)	(94.6)	(0.405)	(38.6)	(11.0)
Total Mercy Hospital Project Emissions						
	ROG	NOx	CO	SO₂	PM₁₀	PM_{2.5}
	lb/day					
Total Mercy Hospital Project Emissions	8.7	46	108	0.40	44	12
<i>Screening Threshold (lb/day)</i>	137	250	550	250	100	100
Exceeds Threshold? (Y/N)	No	No	No	No	No	No

Table 5.4-7. Project Maximum Annual Operational Emissions with Project Conditions

<i>Scripps Mercy Annual Operational Criteria Pollutant Emissions</i>						
<i>Hospital I and II</i>						
Category	ROG	NOx	CO	SO ₂	PM ₁₀	PM _{2.5}
	tons/year					
Area (Total)	1.42	4.0E-05	4.7E-03	0	2.0E-05	2.0E-05
Energy (Natural Gas)	0.095	0.866	0.728	0.005	0.066	0.066
Mobile (Total)	1.42	6.16	15.2	0.059	6.39	1.74
Hospital I/II Total	2.94	7.03	15.9	0.064	6.46	1.80
<i>Medical Office Building</i>						
Category	ROG	NOx	CO	SO ₂	PM ₁₀	PM _{2.5}
	tons/year					
Area (Total)	0.801	2.00E-05	1.81E-03	0.000	1.00E-05	1.00E-05
Energy (Natural Gas)	0.018	0.167	0.140	0.001	0.013	0.013
Mobile (Total)	1.14	4.93	11.1	0.04	4.34	1.18
MOB Total	1.96	5.10	11.3	0.04	4.36	1.19
<i>Hospital Support Building</i>						
Category	ROG	NOx	CO	SO ₂	PM ₁₀	PM _{2.5}
	tons/year					
Area (Total)	0.250	1.0E-05	5.9E-04	0	0	0
Energy (Natural Gas)	0.006	0.054	0.046	3.2E-04	0.004	0.004
Mobile (Total)	0.158	0.682	1.65	0.006	0.685	0.186
HSB Total	0.414	0.736	1.69	0.007	0.689	0.190
<i>Central Energy Plant Expansion Building</i>						
Category	ROG	NOx	CO	SO ₂	PM ₁₀	PM _{2.5}
	tons/year					
Area (Total)	9.2E-03	0	2.0E-05	0	0	0
Energy (Natural Gas)	1.4E-04	1.3E-03	1.1E-03	1.0E-05	1.0E-04	1.0E-04
Mobile (Total)	0.002	0.011	0.030	0.0001	0.014	0.004
CEP Total	0.012	0.012	0.031	0.0001	0.014	0.004
<i>Existing Hospital, Medical Office Building, & Behavioral Health Clinic Demolished</i>						
Category	ROG	NOx	CO	SO ₂	PM ₁₀	PM _{2.5}
	tons/year					
Area (Total)	(3.08)	(5.0E-05)	(5.4E-03)	0	(2.0E-05)	(2.0E-05)
Energy (Natural Gas)	(0.187)	(1.70)	(1.43)	(0.010)	(0.129)	(0.129)
Mobile (Total)	(1.10)	(4.76)	(12.3)	(0.049)	(5.37)	(1.46)
Existing Total (to subtract)	(4.37)	(6.46)	(13.7)	(0.059)	(5.50)	(1.59)
<i>Total Mercy Hospital Project Emissions</i>						
	ROG	NOx	CO	SO ₂	PM ₁₀	PM _{2.5}
	tons/year					
Total Project Emissions	0.96	6.41	0.05	0.05	6.02	1.60
<i>Screening Threshold (ton/yr)</i>	15	40	100	40	15	-
Exceeds Threshold? (Y/N)	No	No	No	No	No	No

Table 5.4-8. Health Risk Results from Construction DPM Emissions

Risk Type	Receptor Type	Risk Results	Threshold	Exceed Threshold?
30-year Cancer Risk	Resident	8.71E-05	1.0E-05	Yes
	Sensitive Receptor	2.77E-05		Yes
Chronic Risk	Resident	0.09	1.0	No
	Sensitive Receptor	0.03		No
Acute Risk	Resident	0.89	1.0	No
	Sensitive Receptor	0.70		No

Table 5.4-9. Health Risk Results from Construction DPM Emissions with Mitigation

Risk Type	Receptor Type	Risk Results	Threshold	Exceed Threshold?
30-year Cancer Risk	Resident	9.58E-06	1.0E-05	No
	Sensitive Receptor	3.05E-06		No



Figure 5.4-1. Location of Nearest Sensitive Receptors

5.5 Historical Resources

This section evaluates potential impacts to historical resources associated with the project. The following discussion is based on a *Historical Resource Research Report* (HRRR) prepared for 550 Washington Street, (February 1, 2020); and an HRRR prepared for 4077, 4099, and 4123 Fifth Avenue (October 5, 2020); *Historical Resource Technical Report* (HRTR) prepared for 550 Washington Street, (March 9, 2022); and an HRTR prepared for 4077, 4099, and 4123 Fifth Avenue (March 9, 2022). All reports were prepared by Nexus Planning and Research, and are included as Appendix F1, Appendix F2, Appendix F3, and Appendix F4, respectively.

5.5.1 Existing Conditions

The project site is generally located at 4077 Fifth Avenue in the Medical Complex Neighborhood (City of San Diego Historical Resources Board) of the Uptown Community Plan area and within the Mercy Hospital District – an identified historic district, HRB#397. The project site includes historically-designated building (the Mercy Chapel, the College Building, and the Mercy Gardens Buildings), buildings that have been evaluated for potential historical significance and were found not to be historic, and buildings that do not have the potential for historical significance.

5.5.1.1 Historical Context

Historical resources are physical features, both natural and constructed, that reflect past human existence and are of historical, archaeological, scientific, educational, cultural, architectural, aesthetic, and/or traditional significance. These resources may include such physical objects and features as archaeological sites and artifacts, buildings, groups of buildings, structures, districts, street furniture, signs, cultural properties, and landscapes. Historical resources in the San Diego region span a timeframe of at least the last 10,000 years and include both the prehistoric and historic periods. For purposes of this EIR, historical resources consist of archaeological sites and built environment resources determined as significant under CEQA.

AECOM prepared the Prehistoric Cultural Resources report for the Uptown Community Plan, included as Appendix C, *Uptown Archeological Study*, of the Uptown Community Plan. The Prehistory and Ethnohistory information included below is provided from this appendix.

Prehistory

The prehistoric cultural sequence for what is now San Diego County is generally thought of as three basic periods: Paleoindian, locally characterized by the San Dieguito complex; Archaic, characterized by the cobble and core technology of the La Jollan and Pauma complexes; and Late Prehistoric, marked by the appearance of ceramics, small arrow points, and cremation burial practices. Late

Prehistoric materials in southern San Diego County, known as Yuman I and Yuman II, are believed to represent the ancestral Kumeyaay.

In San Diego County, the Paleoindian period is represented by the San Dieguito complex. The earliest well-documented sites in the San Diego area belonging to the San Dieguito complex are thought to be older than 9,000 years. Related materials, sometimes called the Lake Mojave complex, have been found in the Mojave Desert and in the Great Basin. Diagnostic artifact types and categories associated with the San Dieguito complex include scraper planes, choppers, scraping tools, crescentics, and elongated bifacial knives, as well as Silver Lake, Lake Mojave, and leaf-shaped projectile points. Like the Lake Mojave complex, the San Dieguito complex is thought to represent an early emphasis on generalized hunting. There are few or no milling implements in most San Dieguito components. In areas adjacent to the coast, many Paleoindian period sites have probably been covered by rising sea levels since the end of the Pleistocene. In more inland regions, alluvial sedimentation in valley areas may have covered these materials. The stable mesa landforms in the region, the abundance of appropriate lithic material, and soil column exposures along areas such as the San Dieguito River have made the foothills an important area for Paleoindian research. At the Harris site (CA-SDI-149), approximately 20 miles north of the community of Uptown, these materials were first identified in stratigraphic context.

The Archaic period (8000 to 1500 B.P.) brings a shift toward a more generalized economy and an increased emphasis on seed resources, small game, and shellfish. The local cultural manifestations of the Archaic period are called the La Jollan complex along the coast and the Pauma complex inland. Pauma complex sites lack the shell that dominates many La Jollan complex site assemblages. The La Jollan tool assemblage is dominated by rough, cobble-based choppers and scrapers, as well as slab and basin metates. There has been considerable debate about whether San Dieguito and La Jollan patterns might represent the same people using different environments and subsistence techniques, or whether they are separate cultural patterns. However, there seems to have been some reorientation in settlement from coastal sites to inland settings during the latter portion of this period in the area that is now northern San Diego County. This appears at approximately 4,000 years ago, and is thought to relate to the final phases of Holocene sea level rise and resultant siltation of the formerly productive coastal lagoons in the area that is now northern San Diego County. There appears to be no significant silting in Mission Bay and San Diego Bay, and no reduction in settlement along the coast south of Mission Bay.

The Late Prehistoric period (1500 B.P. to 200 B.P.) is characterized by higher population densities and elaborations in social, political, and technological systems. Economic systems diversified and intensified during this period with the continued elaboration of trade networks, the use of shell-bead currency, and the appearance of more labor-intensive but effective technological innovations. Subsistence is thought to have focused on acorns and grass seeds, with small game serving as a primary protein resource and big game as a secondary resource. Fish and shellfish were also secondary resources, except in areas immediately adjacent to the coast, where they assumed

primary importance. The settlement system is characterized by seasonal villages where people used a central-based collecting subsistence strategy. Artifactual material is characterized by the presence of arrow shaft straighteners, pendants, comales (heating stones), Tizon Brownware pottery, ceramic figurines reminiscent of Hohokam styles, ceramic “Yuman bow pipes,” ceramic rattles, miniature pottery vessels, various cobble-based tools (e.g., scrapers, choppers, hammerstones), bone awls, manos and metates, and mortars and pestles. The arrow-point assemblage is dominated by the Desert Side-notched series, but the Cottonwood series and the Dos Cabazas Serrated type also occur. Late Prehistoric materials found in southern San Diego County, known as Yuman I and Yuman II, are believed to represent the ancestral Kumeyaay.

Ethnohistory

The Ethnohistoric Period, sometimes referred to as the ethnographic present, commences with the earliest European arrival in the area that is now San Diego, and continued through the Spanish and Mexican periods and into the American period. The founding of Mission San Diego de Alcalá in 1769 brought about profound changes in the lives of the Kumeyaay. If the coastal Kumeyaay did not first die from introduced diseases, most were brought into the mission system. Earliest accounts of Native American life in what is now San Diego were recorded as a means to salvage scientific knowledge of native lifeways. These accounts were often based on limited interviews or biased data-collection techniques. Later researchers and local Native Americans began to uncover and make public significant contributions in the understanding of native culture and language. These studies have continued to the present day, and involve archaeologists and ethnographers working in conjunction with Native Americans to address the continued cultural significance of sites and landscapes across San Diego County. The Kumeyaay are the identified Most Likely Descendants for all Native American human remains found in the City.

By the time Spanish colonists began to settle in Alta California in 1769, the area that is now the community of Uptown was within the territory of the Kumeyaay people, a group of exogamous, nontotemic territorial bands with patrilineal descent. The Kumeyaay spoke a Yuman language of the Hokan linguistic stock. South of the present-day U.S./Mexico border to northern Ensenada were the closely related Paipai. To the north in the San Dieguito River Valley were the Takic-speaking Luiseño.

The Kumeyaay had a hunting and gathering economy based primarily on various plant resources. For people in the area that is now the community of Uptown, grass seeds were probably the primary food, supplemented by various other seeds such as sage (*Salvia* spp.), sagebrush (*Artemisia californica*), lamb’s quarters (*Chenopodium album*), and pine nuts (*Pinus* sp.). Small game was a major source of protein, but deer were hunted as well. Coastal bands ate a great deal of fish, taking them with lines, nets, and bows and arrows. Balsas or reed boats were used. Shellfish and other littoral resources were important to coastal people, too. Settlements were moved seasonally to areas where wild foods were in season. For example, inland bands might have moved into desert areas in the spring to gather agave (*Agave deserti*), then to higher-altitude areas in the fall to gather acorns. Coastal bands lived in more or less permanent villages focused on more seasonally stable

inshore and littoral resources. However, they often traveled to the area that is now Torrey Pines and La Rumarosa (in northern Baja California) to harvest pine nuts, for example, and to Cuyamaca and Mount Laguna for acorns.

One named Kumeyaay village was identified in the vicinity of the community of Uptown: the village of Cosoy/Kosaii/Kosa'aay. Villages and campsites were generally located in areas where water was readily available, preferably on a year-round basis. The San Diego River, which is located approximately 0.5 miles from the Uptown community planning area, provided an important resource not only as a reliable source of water, but as a major transportation corridor through the region. Major coastal villages were known to have existed along the San Diego River, including the village of Cosoy/Kosaii/Kosa'aay near the mouth of the San Diego River. Although the actual location of the village is unknown, it was reported that a site called Cosoy/Kosaii/Kosa'aay by the Native Americans was in the vicinity of Presidio Hill and Old Town, located less than one mile west of the community planning area boundary. Several investigations have identified possible locations for the village of Cosoy/Kosaii/Kosa'aay; however, the actual site has never been found. Several additional large villages have been documented along the San Diego River through ethnographic accounts and archaeological investigations in the area. These include Nipaquay, located near present-day Mission San Diego de Alcalá; El Corral, located near Mission Gorge; Santee Greens, located in eastern Santee; and El Capitan, located approximately 21 miles upstream of the Uptown community planning area, now covered by the El Capitan Reservoir.

History of Hillcrest

The first transfer of property located in what is present day Hillcrest occurred in 1870 when the City of San Diego deeded land to Mary Kearney, who sold it in February 1871 to C.D. Arnold and D. Choate, well-known subdividers. The land passed through a succession of hands before it was acquired by the founder of Hillcrest, William Wesley Whitson. During the 1890s, there was minimal development in this area, generally typified by several churches and a scattering of residences. In 1904, historical photographs of the general Hillcrest area show small scattered areas of residential homes. Most of these homes appear to be of a Victorian or Craftsman style along dirt streets, consisting of one or two stories, with smaller associated buildings located nearby.

As previously stated, Hillcrest was founded in 1907 by San Diego's first coroner, William Wesley Whitson. With a \$1,000 down payment and \$115,000 loan, Whitson formed the Hillcrest Company and purchased 40 acres of "stony hill" between First Avenue (originally Second Avenue) and Sixth Avenue from University Avenue to Lewis Street, just above Washington Street, and began to subdivide. Whitson's subdivision map was filed on January 10, 1907, and the deed to the property was recorded by the Hillcrest Company on August 2, 1907.

In 1907, when the Hillcrest Company began to subdivide, there was one church, one chapel, one store, one hospital, and one school in the area serving a few scattered residents. The area was not paved, nor were there any sidewalks. Almost immediately, the Hillcrest Company put in streets and

curbs, subdivided property lots, set up a lumber mill, and started building houses, usually two-story Craftsman vernacular homes made of wood and stone. Lots were large and roadways were wide. Residential lots in Hillcrest sold for between \$1,400 to \$2,000, while commercial lots were more expensive.

By 1909, Whitson's Hillcrest Company was fully engaged in developing Hillcrest. The Hillcrest Company put in streets (largely still dirt) and curbs, subdivided lots, and constructed homes.

History of the Medical Complex Neighborhood (HRB# 397)

The Scripps Mercy Hospital Campus is located in the Medical Complex Neighborhood (HRB #397) in the Uptown community of the City of San Diego. The Medical Complex Neighborhood is confined to the mesa top north of downtown San Diego and bordered by University Heights to the east, Hillcrest to the south, Mission Hills to the west, and Mission Valley to the north. The Uptown community is the oldest and most urbanized area of the City outside of historic downtown San Diego (excluding prehistoric epochs, Native American peoples, and the neighborhood of Old Town).

Per the Uptown Community Plan, the Medical Complex Neighborhood (HRB #397) is located in the northcentral area of Uptown and bounded by Washington Street to the south, SR 163 to the east, Dove Street to the west, and a canyon edge to the north. The Medical Complex Neighborhood (HRB #397) is dominated by two medical campuses: Scripps Mercy Hospital San Diego and the UCSD Medical Center.

The block pattern of neighboring Hillcrest was carried north into the Medical Complex Neighborhood (HRB #397), but canyons and the early development of medical services disrupted the grid pattern, shifting block dimensions and street geometries and allowing for larger multi-family blocks and sites for medical office buildings. Buildings in the Medical Complex Neighborhood (HRB #397) are more diverse than other Uptown neighborhoods. They vary in age, massing, style, and use. The oldest buildings date back to the turn of the century with representative examples of almost all architectural styles since, including early modern and modern styles of architecture. Over 40 percent of the neighborhood is occupied by the medical campuses, influencing its auto-oriented nature in contrast with the pedestrian and retail orientation of Hillcrest directly to the south, or the single-family orientation of Mission Hills to the west, resulting in the lowest percentage of single-family homes in the entire Uptown Community Plan area.

The Uptown community's development began with speculation by investors motivated by Alonzo Horton's purchase and development success of downtown San Diego. The first wave of development in the Uptown community, from 1885 to 1909, began closest to downtown and progressively moved northwards. Subdivision and construction occurred through five distinct historical contexts:

- The Railroad Boom and Early Residential Development: 1885-1909;
- The Panama-California Exposition and Streetcar Suburbs: 1909-1929;
- The Great Depression and World War II: 1929-1948;
- Postwar Development, Suburbanization, the Automobile, & Modernism: 1948- 1970; and
- Neighborhood Revitalization and the LGBTQ Community: 1970-Present.

The Medical Complex Neighborhood has development representing each of the five historical contexts due to the initial development and continued growth of two significant medical campuses that dominate the neighborhood. UCSD Medical Center (previously the San Diego County Hospital) and Scripps Mercy Hospital have had a presence in the Uptown community for over a century. As far back as the 1880s, Dr. William A. Edwards' Sanitarium and Private Hospital was located in Florence Heights, just west of the Medical Complex Neighborhood.

In 1904, the San Diego County Hospital constructed its first structure on the north and west side of the neighborhood at the terminus of Front Street overlooking Mission Valley. It had significant expansions in 1910 and 1926. In 1924, St. Joseph's Medical Center (now Scripps Mercy Hospital and Medical Center) moved to its new campus on Fifth Avenue, also overlooking Mission Valley on the east side of the neighborhood. The original (Scripps) Mercy campus included a six-story hospital, nursing school, convent, and chapel in 1924.

The intensity of medical uses continued to grow and expand over the decades with major medical hospital and office projects throughout the neighborhood. Both the County Hospital and (Scripps) Mercy constructed new, 11-story hospitals in 1965 and 1966, respectively. In 1966, San Diego County contracted with UCSD to operate its County Hospital with final purchase and rebranding in 1980. Modernization and expansion have continued with significant projects in the 1990s and early 2000s for both campuses. More growth and redevelopment are planned through 2030 for the UCSD Medical Center campus, including high-density, multi-family housing amongst the medical uses. Residential buildings within the Medical Complex Neighborhood and adjacent neighborhoods include single-story single-family houses, but these are outnumbered by multi-family duplexes, garden apartments, and buildings up to five stories in height. Future development of this neighborhood calls for continued medical redevelopment and expansion, as well as high-density residential redevelopment, as delineated in the Uptown Community Plan.

The Medical Complex Neighborhood (HRB #397) has seen dramatic changes in scale and intensity of development. The mixed uses have always been present with a near-constant growth and intensification of the medical campuses since they first appeared in the neighborhood.

History of Scripps Mercy Hospital in Hillcrest

The history of the Sisters of Mercy's hospital in San Diego began in 1890. Father Ubach, who had established San Diego's first Catholic church, worked for years to bring the Sisters of Mercy (Sisters)

to San Diego. Sister Mary Michael Cummings arrived in 1890, and she was immediately mandated by the local bishop to establish a Catholic hospital for San Diego.

Due to an economic downturn, Sister Mary Michael Cummings was able to only lease the upper portions of a commercial building in downtown San Diego, the heart of the commercial district, at the corner of Sixth Avenue and H Street (Market Street today). The original St. Joseph's Hospital (precursor to the Mercy Hospital) was opened on the second floor of the Reed Building in 1890, over a dry goods store. The Sisters referred to their first hospital, a five-bed facility, as the St. Joseph's Dispensary. By 1891, the need for a larger hospital complex presented itself, and Sister Mary Michael Cummings began to make plans to move to the Hillcrest area. The hospital's second location, a new three-story building, called St. Joseph's, was completed and operating by the end of 1891.

The Sisters quickly established themselves in the community. The church and Sisters soon realized that the community's need for their services required further expansion, which prompted the purchase of a 10-acre site in University Heights that was secured by Bishop Mora and Father Ubrech. The Sisters officially incorporated on March 18, 1893. The Sisters were always fundraising in order to support the community's medical needs, and they were constantly redeveloping and expanding their hospital facilities to meet increasing public demand.

Constant expansion was Sister Mary Michael Cummings's dream. By 1904, San Diego's first training school for nurses was opened on the St. Joseph's campus in addition to new hospital wing. By this point in time, the Sisters' hospital services included state-of-the-art operating rooms, classrooms, and x-ray facilities. Eventually, the new hospital site would include the main hospital, a convent, training school for nurses, tuberculosis tents for patients, an "Old Men's Home," housing for nurses and staff, and other facilities for medical purposes. Once the hospital complex was moved up to the Sixth Avenue and University Avenue area, small houses and cottages were moved to the hospital grounds for a wide variety of uses.

It took almost 20 more years and the construction of many temporary buildings before the Sisters were able to realize their vision of a hospital that would serve San Diego's needs. Fundraising efforts were constant; by the early 1920s, funds to begin construction for the new Mercy Hospital were in hand. After the new hospital (herein referred to as the 1926 hospital) was completed in 1926 to 1928, the grounds were cleared of outdated buildings, the previous hospital relocated to University Avenue for commercial reuse, and others demolished. Per the Mercy archives, the old hospital was wrecked and the grounds cleared of debris.

Although the hospital was completed in 1926 to 1928, redevelopment and expansion were always constant as the Sisters continually raised money to support the community's increasing demand. 1926 saw the completion of the north wing of the hospital and the new Mercy School of Nursing. Mother Mary Michael Cummings's dream of a complete reconstruction of her establishment had

come true within four years of her death. On November 2, 1927, further funds came with a bequest of \$300,000 from the estate of Mr. John Spreckels. Ground was broken for the Spreckels Wing (south) on January 19, 1928.

By the 1950s, the Sisters of Mercy were working on a new long-range phased plan for meeting the community's medical needs. Advancement in technology and the community's growing population outgrew the 1926 hospital. A new master plan was initiated to redevelop the Medical Center to include enlargement of the 1926 hospital to 450-beds, as well as addition of a diagnostic and treatment center, a new administrative wing, a long-term care, psychiatric section, and a medical research facility.

The first contemporary medical building to be built on the Mercy campus was the Mercy-Guadalupe Clinic (Building C), initially completed in 1961, was built as a diagnostic and treatment center to replace the Guadalupe Clinic. The original Guadalupe Clinic was supported and managed by the Our Lady of Victory Missionary Sisters and served upwards of 25,000 people a year. Medical care was overseen by 162 volunteer doctors of the County Medical and Dental Societies and staffed with nurses and other support staff. The construction of Building C enabled the mission to continue. Construction and operation was supported by multiple funding sources. The Sisters of Mercy owned the facility, but its day-to-day operations were handled by the Guadalupe team.

In 1966, an addition to Building C was completed—the previously planned psychiatric ward. Per construction drawings dated 1965, the alterations included the enclosure of the ground floor (previously open air parking), addition of a third story, a three-story addition to the west, stairs from the parking lot to the upper hospital level, and a massive retaining wall system along the north and west elevations. The additional space more than doubled Building C's size and was allocated to a 50-bed psychiatric care unit. Building C is referred to as the Behavioral Health Unit today.

The 1926 300-bed Mercy Hospital operated until the initial phase of the present-day Scripps Mercy Hospital and Medical Center was constructed and completed in 1966. The new hospital, designed by Howard Shaw of Frank L. Hope and Associates, was started on the property directly west of the 1926 hospital. At completion, it exceeded its initial design, size, and budget. Its final price tag was \$15.5 million, and was touted as the most technically advanced hospital for the period. Initially, the Sisters planned to remodel the 1926 hospital building for long-term care. During refurbishment planning, it was determined that the old hospital could not be refurbished to meet building standards of the day, and demolition was scheduled and completed by 1971. The 1961 twelve-story stair and elevator structure, however, remained in anticipation of adding more stories to Building C.

By 1971, there were 22 buildings remaining from the Sisters' initial development of the hospital complex. The Sisters decided to demolish them in favor of redevelopment and expansion of their complex. Since 1890, the Sisters have chosen to redevelop their land, or move, in order to expand their facilities and deliver on their mission to provide state-of-the-art medical care to all San Diegans.

As their facilities aged and met maximum years of service, they would demolish and rebuild or add to existing buildings in order to complete their mission, to care for the sick. With funding always tight, they developed and expanded as fundraising allowed and in a piecemeal fashion. By the late 1970s, the 1966 hospital required significant improvements, including remodeling of its elevator core and expansion of its administrative services. These improvements required demolition of the original building entry. A new primary elevation and entry (probably designed by C. W. Kim of Frank L. Hope and Associates) was added to the primary elevation of the hospital to make the necessary improvements. The work began in 1980 and was completed in 1982.

Another significant addition was made in 1986 to meet the need for emergency care, which was enlarged again in the late 1990s (since demolished) and further added to in 2012. Nearly 100 Sisters of Mercy once bustled through the hallways when the hospital was the region's only fully equipped and staffed medical facility.

In 1995, the Sisters of Mercy joined the Scripps Health system; however, the hospital remains a Catholic medical center. When the Sisters of Mercy decided to sell their Hillcrest facility to the Scripps Health system in 1995 because of financial pressures facing smaller, free-standing hospitals, the transaction came with the requirement that the hospital remain Catholic and that its doctors and nurses continue to follow the ethical and religious guidelines published by the church.

As of 2016, there were six Sisters of Mercy actively providing spiritual care, celebrating births and assisting families as they mourn. Today, the Scripps Mercy Hospital San Diego operates a 500-bed hospital (17 beds licensed to Rady's Children Hospital) and medical center with a medical staff of more than 1,200. Scripps Mercy Hospital is also San Diego's first and only Catholic Hospital and continues to operate today.

5.5.1.2 Existing Structures

The project site includes the Medical Hospital District, HRB #397, which includes the Mercy Chapel, the College Building, and the Mercy Gardens Buildings, that would not be adversely affected by that project. Additionally, as analyzed in the two HRTs prepared for the project, there are four buildings that have been evaluated for historical significance: 550 Washington Street, 4077 Fifth Avenue, 4099 Fifth Avenue, and 4123 Fifth Avenue. These buildings were determined not to be historic, as further described below.

The 550 Washington Street building is an eight-story medical office building located in the Medical Complex Neighborhood (HRB #397) of the Uptown community just north of Washington Street, west of SR 163, and east of Fifth Avenue. It is associated with the Scripps Mercy Hospital campus to the north. The building was permitted for construction in 1961 and construction was complete in 1964. The building has a rectangular/symmetrical tower and asymmetrical base that encloses the ground floor and extends to the east and west sides of the tower. The building's initial architectural style

included characteristics and features of both the International and Brutalist architectural styles per the San Diego Modernism Context Statement. It has a concrete structure, concrete frame, cast-concrete panels, and aluminum tracery. Significant permitted alterations in 1978, 1991, 2003, and 2004 include the removal of iconic landscape design including four reflecting pools and architectural alterations including the enclosure of the iconic open-air pavilion, enclosure of the slender rectangular columns with circular stucco wraps, the addition of an out-patient surgical unit encroaching into the formerly open-air pavilion, and a landscape and facade aesthetic treatment on and around the one-story wings of the Building which added stucco elements to each elevation and further enclosed the open-air ground floor plaza. The building fronts onto Washington Street and is surrounded by commercial and medical office buildings in a mix of architectural styles. It sits at street level with a shallow set-back from Washington Street and a surface parking lot along its north side.

The 4077 Fifth Avenue (Buildings D and J), also known as Scripps Mercy Hospital San Diego, is an asymmetrical and rectangular twelve story/183-foot tall concrete and steel framed hospital with a multi-story base and reinforced concrete foundation. It was initially constructed in 1963 to 1966. 4077 Fifth Avenue includes significant alterations that took place during multiple phases of construction. The phases of construction are referenced as phases D1, D2, D3, and J. Phase D1 (1963 to 1966) includes the initial construction. This phase includes the twelve-story tower that is rectangular in form with the long edge of the form running north south. The tower is finished with concrete and the tower's base is a combination of concrete, stucco, and glass. Phase D2 (1980 to 1982) included partial demolition of phase D1 and the construction of an additional twelve-story addition directly to the west of phase D1. The addition is finished with a combination of concrete, stucco, and mirrored glass. Phase D3 (1986) included partial demolition of phases D1 and D2. This phase is located in the southwest corner of the building, just south of the 1982 atrium. Phase J (2012) included partial demolition of phase D3 and construction of a new emergency department to the hospital's primary elevation.

The 4099 Fifth Avenue (Building C) was permitted in 1957 and construction was completed in 1961. Originally referred to as the Mercy-Guadalupe Clinic, it was designed and constructed as a 20,000-square-foot elevated one-story diagnostic and treatment center with 32 private examination rooms, a three-chair dental office, laboratory, pharmacy, conference and lecture rooms, and patios and waiting rooms. In 1965, a 50-bed psychiatric unit was added; it was completed in 1966. The addition completely covered the existing Mercy-Guadalupe Clinic, infilled the ground floor and two open-air atrium courtyards, and added a two-story addition directly to the west of the existing building. Today, the building measures approximately 53,000 square feet and is three stories tall.

The 4123 Fifth Avenue (Building G), also known as Mercy Manor, was constructed in 1965/1966. The building was designed and built as a 24-unit apartment building with an associated playground for the residents at the rear of the building. Building G is a three-story wood-framed building built on a flat pad against a steep slope. A concrete pier foundation allows the building to ignore the steep

slope, and the structural foundation is open on the north elevation's down-slope. The building is rectangular in form with open gabled roofs on both the east and west short elevations. The gable ends have exposed roof rafters. There are eight units per floor accessed by exterior cantilevered walkways wrapping the east, south, and west elevations. Elevated walkways and open-tread stairs bridge the south elevation to the site. Walkways and stairs are lined with a vertical iron picket railings. Each unit has an exterior cantilevered balcony on the north elevation. Windows and doors are simple punched openings with aluminum frames. The building is in poor condition with visible wood rot and rusted metal.

5.5.2 Regulatory Framework

As described in the City's Thresholds), Federal, State, and local criteria have been established for the determination of historical resource significance. The criteria for determining a resource's significance generally focus on a resource's integrity and uniqueness, its relationship to similar resources, and its potential to contribute important information to scholarly research. Some resources that do not meet Federal significance criteria may be considered significant under State or local criteria.

5.5.2.1 Federal

National Historic Preservation Act

The National Historic Preservation Act (NHPA) establishes the Federal government policy on historic preservation and the programs – including the National Register of Historic Places (NRHP) – through which this policy is implemented. Under the NHPA, significant cultural resources, referred to as historic properties, include any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the NRHP. Historic properties also include resources determined to be National Historic Landmarks (NHL). NHLs are nationally significant historic places designated by the Secretary of the Interior (SOI) because they possess exceptional value or quality in illustrating or interpreting United States heritage. A property is considered historically significant if it meets one of the NRHP criteria and retains sufficient historic integrity to convey its significance. This act also established the Advisory Council on Historic Preservation (ACHP), an independent agency responsible for implementing Section 106 of NHPA by developing procedures to protect cultural resources included on, or eligible for inclusion, on the NRHP. Regulations are published in 36 CFR Part 60 and 63, and 36 CFR, Part 800. A property is considered historically significant if it meets one of the NRHP criteria listed below and retains sufficient historic integrity to convey its significance:

- A. That are associated with events that have made a significant contribution to the broad patterns of our history; or
- B. That are associated with the lives of persons significant in our past; or
- C. That embody the distinctive characteristics of a type, period, or method of construction.

- Or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D. That have yielded, or may be likely to yield, information important in prehistory or history.

Ordinarily cemeteries, birthplaces, or graves of historical figures, properties owned by religious institutions or used for religious purposes, structures that have been moved from their original locations, reconstructed historic buildings, properties primarily commemorative in nature, and properties that have achieved significance within the past 50 years shall not be considered eligible for the National Register. However, such properties will qualify individually if they fall within the following categories:

- A. A religious property deriving primary significance from architectural or artistic distinction or historical importance; or
- B. A building or structure removed from its original location but which is significant primarily for architectural value, or which is the surviving structure most importantly associated with a historic person or event; or
- C. A birthplace or grave of a historical figure of outstanding importance if there is no appropriate site or building directly associated with his productive life; or
- D. A cemetery which derives its primary significance from graves of persons of transcendent importance, from age, from distinctive design features, or from association with historic events; or
- E. A reconstructed building when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other building or structure with the same association has survived; or
- F. A property primarily commemorative in intent, if design, age, tradition, or symbolic value has invested it with its own exceptional significance; or
- G. A property achieving significance within the past 50 years if it is of exceptional importance.

5.5.2.2 State

California Register of Historic Resources

The California Register of Historic Resources (CRHR) was established in 1992. Similar to the NRHP, the CRHR program encourages public recognition and protection of resources of architectural, historical, archaeological, and cultural significance; identifies resources for planning purposes; determines eligibility of state historic grant funding; and provides certain protections under CEQA. A property is eligible for listing on the State register if it meets one of the following designation criteria:

1. Associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States.
2. Associated with the lives of persons important to local, California, or national history.
3. Embodies the distinctive characteristics of a type, period, region, or method of construction or represents the work of a master or possesses high artistic values.
4. Has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.

CEQA was amended in 1992 to define “historical resources” as a resource listed in or determined eligible for listing on the California Register; a resource included in a local register of historical resources or identified as significant in a historical resource survey that meets certain requirements; and any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be significant. Some resources that do not meet these criteria may still be historically significant for the purposes of CEQA.

CEQA sections 15064.5 and 21083.2(g) define the criteria for determining the significance of historical resources. Archaeological resources are considered “historical resources” for the purposes of CEQA. Most archaeological sites that qualify for the CRHR do so under criterion 4 (i.e., research potential). Since resources that are not listed or determined eligible for the State or local registers may still be historically significant, their significance shall be determined if they are affected by a project.

California Public Resources Code

Sections 5097 through 5097.6 of the PRC outline the requirements for cultural resource analysis prior to the commencement of any construction project on State lands. The State agency proposing the project may conduct the cultural resource analysis or they may contract with the State Department of Parks and Recreation. In addition, this section stipulates that the unauthorized disturbance or removal of archaeological, historical, or paleontological resources located on public lands is a misdemeanor. It prohibits the knowing destruction of objects of antiquity without a permit (expressed permission) on public lands and provides for criminal sanctions. This section was amended in 1987 to require consultation with the NAHC whenever Native American graves are found. Violations for the taking or possessing of remains or artifacts are felonies.

California Health and Safety Code

Section 7052 of the California Health and Safety Code (H&SC) makes the willful mutilation, disinterment, or removal of human remains a felony. Section 7050.5 requires that construction or excavation be stopped in the vicinity of discovered human remains until the coroner can determine whether the remains are those of a Native American. If determined to be Native American, the coroner must contact the NAHC. H&SC Section 8010-8030 constitutes the California Native American Graves Protection and Repatriation Act of 2001 (CALNAGPRA). CALNAGPRA, like the Federal act,

ensures that Native American human remains and cultural items are treated with respect and dignity during all phases of the archaeological evaluation process in accordance with CEQA and any applicable local regulations. The code provides a process and requirements for the identification and repatriation of collections of human remains or cultural items to the appropriate tribes from any State agency or museum that receives State funding.

California Government Code Section 65040.2(g)

California Government Code Section 65040.2(g) provides guidelines for consulting with Native American tribes for the following: (1) the preservation of, or the mitigation of impacts to places, features, and objects described in sections 5097.9 and 5097.993 of the Public Resources Code; (2) procedures for identifying through the NAHC the appropriate California Native American tribes; (3) procedures for continuing to protect the confidentiality of information concerning the specific identity, location, character, and use of those places, features, and objects; and (4) procedures to facilitate voluntary landowner participation to preserve and protect the specific identity, location, character, and use of those places, features, and objects.

Native American Burials (PRC Section 5097 et seq.)

State law addresses the disposition of Native American burials in archaeological sites and protects such remains from disturbance, vandalism, or inadvertent destruction; establishes procedures to be implemented if Native American skeletal remains are discovered during construction of a project; and designates the NAHC to resolve disputes regarding the disposition of such remains. The Native American Historic Resource Protection Act (PRC Sections 5097.993 through 5097.994) makes it a misdemeanor punishable by up to a year in jail to deface or destroy a Native American historic or cultural site that is listed or may be eligible for listing in the CRHR. In 2006, AB 2641 (Coto) amended the PRC to provide for the protection of human remains when discovered, as well as conferral with descendants to make recommendations or preferences for treatment of human remains. A landowner, upon discovery of human remains, is required to ensure that the immediate vicinity, as described, is not damaged or disturbed, until specific conditions are met, including discussing and conferring, as defined, with the descendants regarding their preferences for treatment. The amended PRC, along with the California Native American Graves and Repatriation Act (NAGPRA) of 2001 (Health and Safety Code Sections 8010 through 8011) ensures that Native American human remains and cultural items are treated with respect and dignity.

Senate Bill 18

Signed into law in September 2004, and effective March 1, 2005, SB 18 permits California Native American tribes recognized by the NAHC to hold conservation easements on terms mutually satisfactory to the tribe and the landowner. The term "California Native American tribe" is defined as "a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC." The bill also requires that, prior to the adoption or amendment of a City or County's general plan, the City or County consult

with California Native American tribes for the purpose of preserving specified places, features, and objects located within the City or County's jurisdiction. SB 18 also applies to the adoption or amendment of specific plans. This bill requires the planning agency to refer to the California Native American tribes specified by the NAHC and to provide them with opportunities for involvement.

Assembly Bill 52

AB 52, which created the new category of "tribal cultural resources" that applies to all projects that file a Notice of Preparation or Notice of Negative Declaration or Mitigated Negative Declaration on or after July 1, 2015. AB 52 requires lead agencies to provide notice to and begin consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of a project if that tribe has requested, in writing, to be kept informed of projects by the lead agency prior to the determination whether a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report will be prepared. If a tribe requests consultation within 30 days upon receipt of the notice, the lead agency must consult with the tribe. The bill also specifies mitigation measures that may be considered to avoid or minimize impacts on tribal cultural resources.

5.5.2.3 Local

City of San Diego General Plan

The Historical Preservation Element of the City of San Diego's General Plan was adopted in 2008. The principal purpose of the Historic Preservation Element is to guide the preservation, protection, restoration, and rehabilitation of historical and cultural resources and maintain a sense of the City. The Historic Preservation Element additionally seeks to improve the quality of the built environment, encourage appreciation for the City's history and culture, maintain the character and identity of communities, and contribute to the City's economic vitality through historic preservation. The Historic Preservation Element includes goals and policies to guide historical resources management activities.

Historical Resources Regulations

The purpose and intent of the City's Historical Resources Regulations of the LDC (Chapter 14, Division 3, and Article 2) is to protect, preserve, and, where damaged, restore the historical resources of San Diego, which include historical buildings, historical structures or historical objects; important archaeological sites; historical districts; historical landscapes; and traditional cultural properties. These regulations are intended to ensure that development occurs in a manner that protects the overall quality of historical resources. The Historic Resources Regulations require that development affecting designated historical resources or historical districts shall provide full mitigation for the impact to the resource, in accordance with the Historical Resources Guidelines of the Land Development Manual (LDM), as a condition of approval. If development cannot, to the

maximum extent feasible, comply with the development regulations for historical resources, then a project would require a Site Development Permit.

Historical Resources Guidelines of the Land Development Manual

The Historical Resources Guidelines (HRG), located in the City's LDM, provide property owners, the development community, consultants, and the general public explicit guidance for the management of historical resources located within the City's jurisdiction. These guidelines are designed to implement the historical resources regulations and guide the development review process. The guidelines also address the need for a survey and how impacts are to be assessed, available mitigation strategies, and reporting requirements. They also include appropriate methodologies for treating historical resources located in the City.

City of San Diego Historical Resources Register

The City of San Diego also maintains a Historical Resources Register. Per the City, any improvement, building, structure, sign, interior element and fixture, feature, site, place, district, area, or object may be designated as historic by the HRB if it meets any of the following criteria:

- a. Exemplifies or reflects special elements of the City's, a community's, or a neighborhood's historical, archaeological, cultural, social, economic, political, aesthetic, engineering, landscaping, or architectural development;
- b. Is identified with persons or events significant in local, State, or national history;
- c. Embodies distinctive characteristics of a style, type, period, or method of construction or is a valuable example of the use of indigenous materials or craftsmanship;
- d. Is representative of the notable work of a master builder, designer, architect, engineer, landscape architect, interior designer, artist, or craftsman;
- e. Is listed or has been determined eligible by National Park Service for listing on the National Register of Historic Places or is listed or has been determined eligible by the State Historic Preservation Office (SHPO) for listing on the State Register of Historical Resources; or
- f. Is a finite group of resources related to one another in a clearly distinguishable way or is a geographically definable area or neighborhood containing improvements which have a special character, historical interest, or aesthetic value or which represent one or more architectural periods or styles in the history and development of the City.

Historical Resources Board Historic Context

According to the Guidelines for the Application of HRB Designation Criteria, the significance of a historic property can be judged and explained only when it is evaluated in its historic context. Historic contexts are those patterns or trends in history by which a specific occurrence, property, or site is understood and its meaning (and ultimately its significance) within history is made clear. In order to decide whether a property is significant within its historic context, the following things must be determined:

- 1) Identify the themes, geographical limits, and chronological period that the property represents;
- 2) Determine how the theme of the context is significant in the history of the local area;
- 3) Determine what the property type is and whether it is important in illustrating the historic context;
- 4) Determine how the property represents the context through HRB Criteria; and
- 5) Determine what physical features the Subject Property must possess for it to reflect the significance of the historic context.

Uptown Community Plan Historic Preservation Element

The Uptown Historic Preservation Element contains specific goals and recommendations to address the history and cultural resources unique to Uptown in order to encourage appreciation of the community's history and culture. These policies along with the General Plan policies provide a comprehensive historic preservation strategy for Uptown. The Uptown Historic Preservation Element was developed utilizing technical studies prepared by qualified experts, as well as extensive outreach and collaboration with Native American Tribes, community planning groups, and preservation groups. The goals of the Historic Preservation Element are the identification and preservation of significant historical resources in Uptown; and the provision of educational opportunities and incentives related to historical resources in Uptown.

5.5.3 Impact Analysis

5.5.3.1 Issue 1

Issue 1 Would the proposal result in an alteration, including adverse physical or aesthetic effects, and/or the destruction of a prehistoric or historic building (including an architecturally significant building, structure, object, or site)?

Impact Thresholds

According to the City of San Diego LDM, Historical Resources Guidelines, Appendix E, Part 2, any improvement, building, structure, sign, interior element and fixture, site, place, district, area or object may be designated as a historical resource by the City of San Diego Historical Resources Board if it meets one or more of the following criteria:

Criterion A – Community Development: It exemplifies or reflects special elements of a City's, a community's or a neighborhood's historical, archaeological, cultural, social, economic, political, aesthetic, engineering, landscaping, or architectural development. Special elements of development refer to a resource that is distinct among others of its kind or that surpass the usual in significance.

Criterion B – Persons or Events: It is identified with persons or events significant in local, State, or national history. In order for a resource to qualify for designation under Criterion B, for association with a person significant in local, State, or national history, the person must have made demonstrable achievements and contributions to the history of San Diego, the State, or the nation.

Criterion C – Architecture: Embodies distinctive characteristics of a style, type, period, or method of construction or is a valuable example of the use of indigenous materials or craftsmanship. “Style” means the composition, massing, scale, materials, and details exhibit the essential physical features of a recognized architectural style.

Criterion D – Master Builder: Is representative of the able work of a master builder, designer, architect, engineer, landscape architect, interior designer, artist, or craftsman.

Criterion E – National Register: Is listed or has been determined eligible by the National Park Service for listing on the National Register of Historic Places or is listed or has been determined eligible by the State Historical Preservation Office for listing on the State Register of Historical Resources.

Criterion F – Historic District: Is a finite group of resources related to one another in a clearly distinguishable way or is a geographically definable area or neighborhood containing improvements which have a special character, historical interest, or aesthetic value, or which represent one or more architectural periods or styles in the history and development of the City.

The determination of significance of impacts on historical resources is based on criteria found in Section 15064.5 of the State CEQA Guidelines. Section 15064.5 clarifies the definition of a substantial adverse change in the significance of a historical resources as physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resources would be materially impaired.

Analysis

Prehistoric Resources

As documented in the Final EIR for the Uptown Community Plan Update Final EIR, cultural sensitivity for prehistoric resources throughout the update area have been rated as low, moderate, or high; and the current project site is located in an area that is rated as low. Qualified City staff conducted a site-specific search of the California Historic Resources Information Systems (CHRIS) and no recorded archaeological resources were identified on the project site.

Given the previously disturbed nature of the project site, the low sensitivity rating in the Uptown Community Plan Final EIR and the negative CHRIS search, staff was able to conclude that the project would not result in significant impacts to cultural resources.

Historical Resources

Historic Context

One of the historic buildings located on the project site – the Mercy Chapel – would be rehabilitated its 1949 design, in accordance with the Secretary of the Interior’s Standards for the Treatment of Historic Properties. No significant impacts would be associated with rehabilitation of the Mercy Chapel. Other historically designated structures that occur on the project site (the College Buildings and the Mercy Gardens Buildings) would remain as they are today. The project would not affect these structures.

As discussed above, four buildings located within the Scripps Mercy Hospital Campus that would be demolished as part of the project have been analyzed in the project’s HRTRs: 550 Washington Street, 4099 Fifth Avenue (Building C), 4123 Fifth Avenue (Building G), and 4077 Fifth Avenue (Building D). These buildings were determined not to be significant, as detailed below. Therefore, significant impacts to existing historic structures would not occur as a result of the project.

The 550 Washington Street and Buildings C, D, and G do not represent the context through the HRB Criteria, as presented below.

550 Washington Street

- 550 Washington Street does not exemplify or reflect special elements of any aspect of the City’s, community’s, or neighborhood’s development under Criterion A: Community Development. “Special elements” under that criteria are “resources that are distinct among others of their kind or that surpass the usual in significance.” The building meets neither of those tests.
- 550 Washington Street is not significant under Criterion B: Person or Event as no persons or events of importance were associated with the subject property.
- Due to significant and irreversible alterations, 550 Washington Street no longer embodies the characteristics of a style (modernism), type (medical office), period (1948-1970), or method of construction (cast-in-place, slip-from concrete) at a level necessary for significance under Criterion C: Architecture.
- 550 Washington Street was designed by architects Deems Lewis and constructed by Peter Kiewit and Sons. Peter Kiewit and Sons is not identified as a Master Builder in San Diego. Architect William Lewis was recently considered a Master Architect in the City of San Diego, however, due to significant alterations, the medical office building is no longer representative of Mr. Lewis’s innovative work under Criterion D.

- Neither Criteria E nor F apply to 550 Washington Street. Consequently, the property does not represent its historic context under any of the established criteria of the San Diego Historic Resources Board Designation Criteria.

4099 Fifth Avenue (Building C), 4123 Fifth Avenue (Building G), and 4077 Fifth Avenue (Buildings D).

- Buildings C, D, and G do not exemplify or reflect special elements of any aspect of the City's, community's, or neighborhood's development under Criterion A: Community Development. Special elements under that criteria are resources that are distinct among others of their kind or that surpass the usual in significance. These buildings do not meet either of those tests as their historical significance with the Sisters of Mercy or medical care development do not surpass the significance of HRB #397 or HRB #804.
- Buildings C, D, and G are not significant under Criterion B: Person or Event, as no doctors or events of importance were associated with Buildings C, D, or G. While there were significant doctors and events associated with the Scripps Mercy Hospital and Medical Center as a whole, the Buildings C, D, and G are not specifically associated with any of those individuals. (The Sisters of Mercy are a cultural organization. They are not individuals; therefore, their association with the Subject Property is evaluated under Criterion A.)
- Due to significant and irreversible alterations, Buildings C and D no longer embody the characteristics of a style (modernism), type (medical office), period (1948-1970), or method of construction (cast-in-place, slip-form concrete) at a level necessary for significance under Criterion C: Architecture.
- Buildings C and D were designed by Howard I. Shaw, designer for Frank L. Hope and Associates and constructed by F.E. Young Construction Company. F E Young is identified as a Master Builder in San Diego. However, F.E. Young, the person, is not associated with the Subject Property, as he died in 1961, and the buildings were constructed after his death. Shaw, a designer who worked for Frank L. Hope and Associates for 47 years, is not identified as a Master Architect in San Diego. Therefore neither building is significant under Criterion D. Criterion D does not apply to Building G, as neither its architect nor builder are known.
- Neither Criteria E nor F apply to these buildings. Consequently, it does not represent its historic context under any of the established criteria of the San Diego Historic Resources Board Designation Criteria.

For 550 Washington Street, the theme of the historic context is mid-century modern medical office development in the Uptown community designed by a Master Architect. In order to reflect the significance of the historic context, its original design would have to be intact or with alterations that meet the Secretary of the Interior Standards. To the contrary, successive permitted alterations beginning in 1978 and culminating in 2004 significantly altered the building's original design along the entire ground floor—once the building's most notable element. These alterations do not meet the Secretary of the Interior Standards.

For 4099 Fifth Avenue (Building C), 4123 Fifth Avenue (Building G), and 4077 Fifth Avenue (Buildings D), the theme of the historic context is medical care development in the Medical Complex Neighborhood associated with the Sisters of Mercy. In order to reflect the significance of the historic context, the Subject Property would need the following physical features:

- Building forms dating to the early 20th Century to reflect the initial development of medical care in the Medical Complex Neighborhood; or
- An association with the Sisters of Mercy that exceeds that of the Mercy Medical Historic District or St. Joseph's Sanitarium in significance; or
- The construction of Building D would have had to have been under the direct supervision of Master Builder F.E. Young and be intact.

Thus, the project site and associated structures were evaluated relative to historic context and not found to be historically significant.

Evaluation of the Property under the National Register of Historic Places Criteria

Criterion A (National Register) Event: Properties can be eligible for the National Register if they are associated with events that have made a significant contribution to the broad patterns of our history. To be considered for listing on the National Register under Criterion A, a resource must be associated with one or more events important in the defined historic context. Criterion A recognizes properties associated with single events, such as the founding of a town, or a pattern of events, repeated activities, or historic trends, such as the gradual rise of a port city's prominence in trade and commerce. The event or trends; however, must be clearly important within the associated context: settlement, in the case of the town, or development of maritime economy, in the case of a port city. Moreover, the resource must have an important association with the event or historic trends, and it must retain integrity.

No historical evidence was found that would support the determination that the Buildings C, D, G or the 550 Washington Street building were associated with events or trends that made a significant contribution to the broad patterns of the nation's history. Therefore, the buildings do not qualify as historically significant under the National Register's Criterion A.

Criterion B (National Register) Person: Properties may be eligible for the National Register if they are associated with the lives of persons significant in our past. To be considered for listing on the National Register under Criterion B, a resource must be associated with the lives of persons significant in our past. Criterion B applies to properties associated with individuals whose specific contributions to history can be identified and documented. Persons significant in our past refers to individuals whose activities are demonstrably important within a local, state, or national historic context.

No historical evidence was found that would support the determination that Buildings C, D, G, or the 550 Washington Street building was associated with the lives of persons significant in the nation's past. Therefore, the 550 Washington Street does not qualify as historically significant under the National Register's Criterion B.

Criterion C (National Register) Design/Construction: Properties may be eligible for the National Register if they embody the distinctive characteristics of a type, period, or method of construction, or that represents the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction. Embody distinctive characteristics of a type, period, or method of construction. This requirement refers to the way in which a property was conceived, designed, or fabricated by a people or culture in past periods of history. To be eligible under this portion of the criterion, a property must clearly illustrate, through "distinctive characteristics" the pattern of features common to this particular class of resources, the individuality or variation of features that occurs within this class, the evolution of that class or the transition between classes of resources. To be eligible, a property must clearly contain enough of those characteristics to be considered a true representative of a particular type, period, or method of construction. A building eligible under the theme of a specific architectural style must have the vertical and picturesque qualities of that style.

To be eligible under this Criterion, a property must clearly contain enough of the distinctive characteristics that commonly recur in individual types, periods or methods of construction and clearly contain enough of those characteristics to be considered a true representative of a particular type, period, or method of construction. Buildings C, D, and G do not contain the distinctive characteristics of recognized architectural styles to qualify for listing on the National Register under Criterion C. Therefore, Buildings C, D, and G do not qualify as historically significant under the National Register's Criterion C.

The 550 Washington Street building was initially designed and constructed in the New Formalism architectural design aesthetic; however, due to extensive alterations, it is no longer representative example of the New Formalism Style. Therefore, it does not embody distinctive characteristics of a recognized architectural style, specifically any classical revival style of architecture. Type, Period or Method of Construction refers to the way certain properties are related to one another by cultural tradition or function, by dates of construction or style, or by choice or availability of materials and technology. A building is eligible as a specimen of its type or period of construction if it is an important example of building practices of a particular time in history. The 550 Washington Street Building does not serve as an important example of building practices from 1964 as its design, materials, and workmanship are no longer character defining features of a recognized architectural style due to significant alterations. The 550 Washington Street building does not articulate a particular concept of design or aesthetic ideal, therefore, High Artistic Values does not apply and no longer contains the distinctive characteristics of a recognized architectural style to qualify for listing

on the National Register under Criterion C. Therefore, the 550 Washington Building also does not qualify as historically significant under the National Register's Criterion C.

Criterion D (National Register) Archeological information: This criterion applies to properties that have yielded, or may be likely to yield, information important in prehistory or history.

Criterion D is intended to address archaeological resources and is not applicable to Buildings C, D, G, or the 550 Washington Street building; therefore, they do not qualify under National Register's Criterion D.

Based on the above, Buildings C, D, G, and the 550 Washington Street building are not eligible for inclusion on the National Register.

Evaluation of the Property under California State Register Criteria

Criterion 1 (State Register) Association with Events: The property is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States.

No historical evidence was found that would support the determination that an event making a significant contribution to the broad patterns of California history, or the cultural heritage of California or the United States, occurred at Buildings C, D, G, or the 550 Washington building. Therefore, Buildings C, D, G and the 550 Washington Street building are not eligible under California Register Criterion (1).

Criterion 2 (State Register) Association with Persons: The property is associated with the lives of persons important to local, California or National History.

Historical evidence was not found that would support the determination any persons associated with Buildings C, D, G or the 550 Washington Street building were important to local, California or National History at the level required for the California Register. Therefore, Buildings C, D, G and the 550 Washington Street is not eligible under California Register Criterion (2).

Criterion 3 (State Register) Design/Construction: The property embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master or possesses high artistic values.

Buildings C, D, and G are not representative of a recognized architectural style, they do not embody the distinctive characteristics of a type, period, region or method of construction sufficiently to qualify for the California Register of Historical Resources. Therefore, Buildings C, D, and G are not eligible under California Register Criterion (3).

Due to significant alterations, the 550 Washington Street buildings no longer representative of a recognized architectural style and it no longer embodies the distinctive characteristics of a type, period, region or method of construction sufficiently to qualify for the California Register of Historical Resources. Therefore, 550 Washington Street is also not eligible under California Register Criterion (3).

Criterion 4 (State Register) Archaeology: The property has yielded or has the potential to yield information important to the prehistory or history of the local area, California or the nation.

To be designated under this criterion Buildings C, D, G and the 550 Washington Street building must have information to contribute to our understanding of human history and prehistory and that information must be important. Buildings C, D, G and the 550 Washington Street building do not provide information that contributes to our understanding of human history or prehistory. Therefore, Buildings C, D, G and the 550 Washington Street building are not eligible under California Register Criterion (4).

Per the evaluation above, Buildings C, D, G and the 550 Washington Street building are not eligible for inclusion on the California Register.

Evaluation under HRB Criteria

The 550 Washington Street, 4099 Fifth Avenue (Building C), 4123 Fifth Avenue (Building G), and 4077 Fifth Avenue (Building D) were additionally assessed under the Historical Resources Guidelines of the City of San Diego's LDM's Criteria for its potential historical significance. The results of this evaluation is presented below.

The 550 Washington Street building is not significant with respect to any form of historical development and does not qualify under HRB Criterion A (Community Development). The property is not identified with persons or events significant in local, State, or national history and does not qualify under HRB Criterion B (Events/Person). The building originally embodied characteristics and features of modern San Diego architectural styles – International Style and Brutalist – but permitted additions that made significant alterations to its primary features included changes to its composition, massing, form, materials, and overall feeling to the effect that it no longer embodies essential characteristics and features of its original modern architectural styles. As such, it does not qualify under HRB Criterion C (Architecture) as representative of a recognized architectural style (Architecture). The property's architect was Deems Martin and Associates, with Bill Lewis as the project's designer. Mr. Lewis is considered a Master Architect in the City of San Diego; however, based upon significant alterations to the subject property, including the loss of the ground floor's massing, spatial relationships, proportions, windows, doors, materials, and ornamentation, it is no longer a representative example of Mr. Lewis' work. The builder was Peter Kiewit Construction Co.; they are not a Master Builder in the City of San Diego. As such, the building does not qualify under HRB Criterion D (Notable Work of a Master). Lastly, the property is not listed in, or deemed eligible

for listing in the National or California Registers and is not located within an existing historic district; it cannot qualify under HRB Criterion E (National or California Register Eligible) or HRB Criterion F (Historic District).

Building C (4099 Fifth Avenue) is not significant with respect to any form of historical development and does not qualify under HRB Criterion A (Community Development). The building is not identified with persons or events significant in local, State, or national history and does not qualify under HRB Criterion B (Events/Person). The building originally embodied characteristics and features of modern San Diego architectural styles but permitted additions that made significant alterations to its primary features, including changes to its composition, massing, form, materials, and overall feeling to the effect that it no longer embodies essential characteristics and features of its original design. Therefore, it does not qualify under HRB Criterion C (Architecture) as representative of a recognized architectural style. The property's architect was Frank L. Hope and Associates. Frank Hope is considered a Master Architect in the City of San Diego; however, based upon significant alterations to the building, it is no longer a representative example of Mr. Hope's original design. The builder was G.L. Cory Construction, which is not a Master Builder in the City of San Diego. Therefore, the building does not qualify under HRB Criterion D (Notable Work of a Master). Lastly, the property is not listed in, or deemed eligible for listing, in the National or California Registers and is not located within an existing historic district; it cannot qualify under HRB Criterion E (National or California Register Eligible) or HRB Criterion F (Historic District).

Building G (4123 Fifth Avenue) is not significant with respect to any form of historical development and does not qualify under HRB Criterion A (Community Development). The building is not identified with persons or events significant in local, State, or national history and does not qualify under HRB Criterion B (Events/Person). The building embodied some characteristics and features of the Modern Minimal Traditional Style, per the San Diego Modernism Historic Context, however, it does not embody essential physical features of the style in order to be representative of the Modern Minimal Traditional Style. Therefore, it cannot be eligible for and does not qualify under HRB Criterion C (Architecture) as representative of a recognized architectural style. Both the building's architect and builder are unknown; therefore, the building does not qualify under HRB Criterion D (Notable Work of a Master). Lastly, the building is not listed in, or deemed eligible for listing in, the National or California Registers and is not located within an existing historic district; it cannot qualify under HRB Criterion E (National or California Register Eligible) or HRB Criterion F (Historic District).

Building D (4077 Fifth Avenue) has an association with the Sisters of Mercy, but their association with the hospital's development is better represented by the existing Mercy Historic District. Therefore, the building does not qualify under HRB Criterion A (Community Development). The building is not identified with persons or events significant in local, State, or national history and does not qualify under HRB Criterion B (Events/Person). The building originally embodied characteristics and features of modern San Diego architectural styles, but permitted additions made significant alterations to its primary features, including changes to its composition, massing, form, materials, and overall feeling

to the effect that the building no longer embodies essential characteristics and features of its original modern architectural design. Therefore, it does not qualify under HRB Criterion C (Architecture) as representative of a recognized architectural style. The property's architect was Frank L. Hope and Associates. Frank Hope is considered a Master Architect in the City of San Diego; however, based upon significant alterations to the subject property, it is no longer a representative example of Mr. Hope's original design. The builder was F. E. Young Construction Company; F. E. Young is a Master Builder in the City of San Diego; however, he died before this building was constructed. Therefore, the building does not qualify under HRB Criterion D (Notable Work of a Master). Lastly, the property is not listed in, or deemed eligible for listing, in the National or California Registers and is not located within an existing historic district; it cannot qualify under HRB Criterion E (National or California Register Eligible) or HRB Criterion F (Historic District).

The HRRR was presented to the City's Historic Resources Board (HRB) for review and concurrence regarding the findings and conclusions of the report. The HRB agreed with the conclusions of the HRRR, with the exception of 550 Washington Street. For that structure, the HRB's decision was that building is a historic resource. The applicant appealed that decision to the San Diego City Council. On June 29, 2021, the City Council approved the appeal, determining that 550 Washington Street is not historic.

Significance of Impacts

The project would not result in significant impacts to prehistoric resources. Relative to historic resources, the Scripps Mercy Hospital Campus and its individually-evaluated buildings are not eligible for historic designation under any of the HRB Criteria. In addition, the individually-evaluated buildings are recommended not eligible for the national, State, or local registers. The project site and the evaluated buildings should not be considered historical resources for the purposes of CEQA compliance. The historic structures on-site are not part of the development footprint of the project and thus, were not necessary to consider in this analysis. Therefore, no potentially significant structures are present on the property. No impact would result to the built environment.

Mitigation Measures

No mitigation would be required.

5.5.3.2 Issue 2

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

Impact Thresholds

- A religious property deriving primary significance from architectural or artistic distinction or historical importance.

- A site associated with a burial or cemetery; religious, social, or traditional activities of a discrete ethnic population; an important person or event as defined by a discrete ethnic population; or the belief system of a discrete ethnic population.

Analysis

Although the subject property was founded by the Sisters of Mercy as a Catholic hospital, the site is not a religious property and does not derive significance from architectural or artistic distinction of historical importance. Additionally, the site is not associated with a burial or cemetery; religious, social, or traditional activities of a discrete ethnic population; an important person or event as defined by a discrete ethnic population; or the belief system of a discrete ethnic population. As such, due to the lack of existing religious or sacred uses, the project would not result in impacts under this category.

Significance of Impacts

No existing religious or sacred uses are located on the project site. As a result, no impacts to religious or sacred uses would occur.

Mitigation Measures

Mitigation would not be required.

5.5.3.3 Issue 3

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

Impact Threshold

- Discovery of human remains shall always be treated as a significant discovery.

Analysis

The project site is not located within a high sensitivity level for archaeological resources. Should human remains be discovered during construction of the project, work would be required to halt until a determination could be made regarding the provenance of the human remains via the County Coroner and Native American representative, as required. The project would be required to treat human remains uncovered during construction in accordance with the California Public Resources Code (Sec. 5097.98) and State Health and Safety Code (Sec. 7050.5).

Significance of Impacts

Impacts to human remains would be less than significant.

Mitigation Measures

Mitigation would not be required.

5.6 Noise

This section evaluates potential noise impacts associated with the project. The following discussion is based on the *Noise Study* prepared by ARUP (June 9, 2022) and included as Appendix H. For analysis related to land use-based impacts associated with the Noise Element of the General Plan, refer to Section 5.1, *Land Use*.

5.6.1 Existing Conditions

Existing Noise Environment

The current noise environment in the project area is dominated by traffic noise. Current CNELs range from 60.0 to 80.4 CNEL at the nearest receivers.

To calculate existing traffic noise, acoustic modeling software was used at 15 different locations in and around the Scripps Mercy Campus. The 15 receiver locations are shown in Figure 5.6-1, *Traffic and Helicopter Noise Modeling Receiver Locations*. Table 5.6-1, *Existing Vehicular Traffic Noise*, shows existing vehicular traffic noise at the different receiver locations.

Current helicopter noise ranges from 60 to 72 CNEL at the top of the nearest receivers. Noise data for the Sikorsky S-76 helicopter was used as a benchmark for the largest helicopter and loudest potential noise levels at the Scripps Mercy Hospital rooftop heliport. This helicopter data was used as a conservative representation, since it slightly exceeds the current and usual helicopter variants used for medical emergencies in size and weight. An assessment of the current helicopter flight paths south-west and north-east at the two worst-case representative locations (2, 3, 6, 7, and 8) is shown in Table 5.6-2, *Existing Helicopter Noise and Traffic Noise*.

Overview of Sound Measurement

Noise Fundamentals

Quantitative information on the effects of noise on people is well documented. If sufficiently loud, noise may adversely affect people in several ways. For example, noise may interfere with human activities, such as sleep, speech communication, and tasks requiring concentration or coordination. It may also cause annoyance, hearing damage, and other physiological problems. Several noise scales and rating methods are used to quantify the effects of noise on people. These scales and methods consider such factors as loudness, duration, time of occurrence, and changes in noise level with time. However, all the stated effects of noise on people are subjective and depending on the individual.

Sound is a fluctuation in air pressure. Sound pressure levels are measured in units called “decibels” (dB). The particular character of the noise that we hear (a whistle compared with a French horn, for example) is determined by the speed, or “frequency,” at which the air pressure fluctuates, or

“oscillates.” Frequency defines the oscillation of sound pressure in terms of cycles per second. One cycle per second is known as 1 Hertz (Hz). People can hear over a relatively limited range of sound frequencies, generally between 20 Hz and 20,000 Hz, and the human ear does not perceive all frequencies equally well. High frequencies (the whistle, for example) are more easily discerned and therefore more intrusive than many of the lower frequencies (the lower notes on the French horn, for example).

To bring a uniform noise measurement that simulates people’s perception of loudness and annoyance, the decibel measurement is weighted to account for those frequencies most audible to the human ear. This is known as the dBA and it is the most often used descriptor of noise levels where community noise is the issue. As shown in Table 5.6-3, *Common Noise Levels*, the threshold of human hearing is defined as 0 dBA; very quiet conditions (as in a library, for example) are approximately 40 dBA; levels between 50 dBA and 70 dBA define the range of acceptable daily activity; levels above 70 dBA would be considered noisy, and then loud, intrusive, and deafening as the scale approaches 130 dBA. In considering these values, it is important to note that the dBA scale is logarithmic, meaning that each increase of 10 dBA actually describes a doubling of sound pressure. Thus, the background noise in an office, at 50 dBA, is perceived as twice as loud as a library at 40 dBA. For most people to perceive an increase in noise, it must be at least three dBA. At five dBA, the change will be readily noticeable.

It is also important to understand that combinations of different sources are not additive, because of the dBA scale’s logarithmic nature. For example, two noise sources—a vacuum cleaner operating at approximately 72 dBA and a telephone ringing at approximately 58 dBA—do not combine to create a noise level of 130 dBA. In fact, the noise produced by the telephone ringing may be masked by the noise of the vacuum cleaner and not be heard. The combination of these two noise sources would yield a noise level of 72.2 dBA. Noise levels are combined on a logarithmic scale.

Effects of Distance on Noise

Noise varies with distance. For example, highway traffic 50 feet away from a receptor (such as a person listening to the noise) typically produces sound levels of approximately 70 dBA. The same highway noise measures 66 dBA at a distance of 100 feet. This decrease is known as “drop-off.” The outdoor drop-off rate for moving noise sources, such as traffic, is a decrease of 4.5 dBA for every doubling of distance between the noise source and receiver. For stationary noise sources, such as amplified rock music, the outdoor drop-off rate is a decrease of 6.0 dBA for every doubling of distance between the noise source and receiver.

Noise Descriptors Used in Impact Assessment

The sound-pressure level unit of dBA describes a noise level at just one moment. However, since very few noises are constant, other ways of describing noise over more extended periods have been developed. One way of describing fluctuating sound is to describe the fluctuating noise heard over a specific period as if it were a steady, unchanging sound (i.e., as if it were averaged over that time period). For this condition, a descriptor called the Leq can be computed. Leq is the constant sound

level that, in a given situation and period [e.g., Leq (one hour) or Leq (24 hours)], conveys the same sound energy as the actual time-varying sound.

A descriptor for cumulative 24-hour exposure is the day-night sound level (Ldn). This is a 24-hour measure that accounts for the moment-to-moment fluctuations in A-weighted noise levels due to all sound sources during 24 hours, combined. Mathematically, the Ldn noise level is the energy average of all Leq (one-hour) noise levels over a 24-hour period, where nighttime noise levels (10 P.M. to 7 A.M.) are increased by 10 dBA before averaging.

Following Federal Transit Administration (FTA) guidance, the maximum one-hour equivalent sound level or the day-night sound level is used for impact assessment, depending on land use category.

Vibration Fundamentals

Vibrations consist of rapidly fluctuating motions in which the object moves in equal distances from its initial starting point, so that there is no “net” movement. Any object can vibrate in three dimensions: directions: vertical, horizontal, and lateral. It is common to describe vibration levels in terms of velocity, which represents the instantaneous speed of the vibration movement at a point on the object that is displaced. This descriptor is used to assess damage to building (typically evaluated in terms of peak particle velocity, or the maximum instantaneous velocity, since this determines the stress being placed on a building). This measure is not used to evaluate human perception and response to vibration, however. To capture the human perception, another type of average is used, known as the root mean square (rms) amplitude. This calculated number represents the average of the range of vibration motion in a way that represents human perception.

Measurement of Vibration Levels

The root mean square of a vibration signal is the average of the squared amplitude of the signal over a given time period (usually one second). The rms velocity is normally described in inches per second in the United States and meters per second in the rest of the world. Decibel notation is in common use for vibration level, defined as:

$$L_v = 20 \times \log_{10} (V / V_{ref})$$

L_v is the velocity level in decibels, V is the rms velocity amplitude, and V_{ref} is the reference velocity amplitude. All vibration levels in this document are referenced to 1×10^{-6} inches per second. “Vdb” is used in this document for vibration decibels to reduce the potential for confusion with noise decibels.

Effect of Propagation Path

Vibrations are transmitted from the source to the ground, and propagate through the ground to the receiver. Soil conditions have a strong influence on the levels of ground-borne vibration. Stiff soils, such as some clay and rock, transmit vibrations over substantial distances. Sandy soils, wetlands, and groundwater tend to absorb movement and thus reduce vibration transmission. Because

subsurface conditions vary widely, there is no way to accurately model the propagation path through soil. Therefore, vibration levels are most accurately determined as close to the source as possible. However, soil conditions give an important insight to the eventual propagation of vibrations to neighboring sites. Preliminary information available on the location of bedrock along the project alignment was used to estimate the effect of the vibration propagation paths for the proposed subway in the general assessment conducted.

Sensitive Receptors

Noise exposure goals for various types of land uses reflect the varying noise sensitivities associated with each of these uses. Urban areas contain a variety of land use and development types that are noise sensitive. Land uses considered to be sensitive receptors include residential, school, childcare centers, acute care hospitals, and long-term health care facilities. Sensitive receptors are determined based upon special factors which may include the age of the users or occupants, the frequency and duration of the use or occupancy, continued exposure to hazardous substances as defined by Federal and State regulations, and the user's ability to evacuate a specific site in the event of a hazardous incident.

The nearest identified sensitive receptors to the project site are the Select Specialty Hospital, which is across Washington Street to the south of the project site; the Warwick apartment building, located immediately to the east of the project site; Florence Elementary School, located approximately 0.17 mile southwest of the project site; and Green Beans Preschool, located approximately 0.19 mile southwest of the project site. (Refer to Figure 5.4-1, *Locations of Nearest Sensitive Receptors.*)

Construction noise can also affect biological resources, particularly during nesting season for avian species. Special-status species are plant and wildlife species that are protected or recognized as sensitive resources by Federal, State, or local resource agencies or organizations. Special-status species typically have relatively limited distribution and may require specialized habitat conditions. Special-status bird species (including the light-footed Ridgeway's rail, least Bell's vireo, and willow flycatcher) have been observed and/or have moderate to high potential to occur within the sensitive MHPA. The project site is not within or adjacent to the MHPA. The MHPA nearest to where demolition and new construction would occur is located approximately 492 feet east of the project site and is separated from the project by steep slopes, SR 163, and SR 163 on and off ramps.

Noise Monitoring

Monitoring locations are shown in Figure 5.6-2, *Ambient Noise Monitoring Locations*. Two noise surveys were conducted to document existing ambient noise levels. 24-hour measurements were taken at the north and south sides of the Scripps Mercy Campus. In addition to these long-term measurements, 15-minute spot measurements were taken at locations around the perimeter of the project site, as shown in Figure 5.6-3, *Spot Measurement Monitoring Locations*.

5.6.2 Regulatory Framework

5.6.2.1 State

Title 24 of the CCR establishes standards governing interior noise levels that apply to all new single-family and multi-family residential units in California. These standards require that acoustical studies be performed before construction at building locations where the existing Ldn exceeds 60 dBA. Such acoustical studies are required to establish mitigation measures that will limit maximum Ldn levels to 45 dBA in any habitable room. Although there are no generally applicable interior noise standards pertinent to all uses, many communities in California have adopted an Ldn of 45 as an upper limit on interior noise in all residential units.

5.6.2.2 Local

San Diego's environmental review process is established by CEQA. Provisions relating to "Temporary Construction Noise" are in alignment with and reference Section 59.5.0404 of the SDMC:

Construction noise levels measured at or beyond the property lines of any property zoned residential shall not exceed an average sound level greater than 75 dB during the 12-hour period from 7:00 a.m. to 7:00 p.m. In addition, construction activity is prohibited between the hours of 7:00 p.m. of any day and 7:00 a.m. of the following day, or on legal holidays as specified in Section 21.04 of the San Diego Municipal Code, with exception of Columbus Day and Washington's Birthday, or on Sundays, that would create disturbing, excessive, or offensive noise unless a permit has been applied for and granted beforehand by the Noise Abatement and Control Administrator, in conformance with San Diego Municipal Code Section 59.5.0404.

In addition, traffic noise significance thresholds are derived from the 2016 CEQA Significance Determination Thresholds.

Municipal Code

Construction Noise

The SDMC Section 59.5.0404 specifies allowable hours of construction and limits on noise from construction activities. The code section contains the following main points:

- No construction activities between 7 p.m. and 7 a.m.
- No construction activities on Sunday
- No construction activities on major holidays, except for Columbus Day and Washington's birthday
- Construction noise cannot cause an average sound level in excess of 75 dB at a property boundary between 7 a.m. and 7 p.m.

- Exemptions may be granted via a permit issued by the Noise Abatement and Control Administrator, if for instance, noise would be less objectionable at night.

Operational Noise

The SDMC outlines general limits that would apply to building system noise radiated from the property to neighboring properties. Excerpts from the code are included below:

- (a) *It shall be unlawful for any person to cause noise by any means to the extent that the one-hour average sound level exceeds the applicable limits presented in the following table [Table 5.6-4], at any location in the City on or beyond the boundaries of the property on which the noise is produced. The noise subject to these limits is that part of the total noise at the specified location that is due solely to the action of said person.*
- (b) *The sound level limit at a location on a boundary between two zoning districts is the arithmetic mean of the respective limits for the two districts. Permissible construction noise level limits shall be governed by Section 59.5.0404 of this article.*

5.6.3 Impact Analysis

5.6.3.1 Issue 1

Issue 1 Would the project result or create a significant increase in the existing ambient noise levels which exceed the City's adopted ordinance or thresholds?

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

Impact Threshold

Based on the City's CEQA Significance Determination Threshold, a project would have a potentially significant noise impact if it would result in:

- Exposure of people to noise levels that exceed the City's adopted Noise Ordinance, SDMC, Section 59.5.0404 (i.e., 75db(A) Leq[12-hour]).
- Exposure of people to noise levels that exceed the City's adopted Noise Ordinance, SDMC, Section 59.5.0401 as identified in Table 5.6-4; or,
- Exposure of people to transportation noise levels that exceed the sound level limits as presented in Table K-2 of the City's Significance Determination Thresholds and as identified in Table 5.6-5, *Traffic Noise Significance Thresholds*.

Analysis

Construction Noise

The project involves the demolition of existing buildings and the construction of buildings on the Scripps Mercy Hospital Campus, as described in Chapter 3.0, *Project Description*, of this EIR. Construction would be completed in phases, as described in Chapter 3.0 and shown in Figure 5.6-4, *Project Phasing Plan*.

Table 5.6-6, *Typical Construction Equipment Noise Levels*, lists expected site equipment for all construction phases and their corresponding maximum sound levels at a distance of 50 feet. As shown, noise levels associated with the use of heavy equipment at construction sites can range from about 60 to 88 dBA at 50 feet from the source, depending upon the types of equipment in operation at any given time and phase of construction. Construction-related noise varies considerably depending on the location of operating equipment relative to the location of sensitive properties and the number of individual pieces of equipment operating in proximity to one another.

As referenced in Table 5.6-4, *City of San Diego Applicable Limits*, the City of San Diego limits the average sound level from construction noise to 75 decibels at any property zoned residential during the 12-hour period from 7:00 a.m. to 7:00 p.m. To evaluate the likely noise impact from construction, equipment scheduled for use during each construction phase was identified and measured. Construction noise estimates are based upon noise levels reported by the FTA, Office of Planning and Environment, and the distance to nearby sensitive receptors. Four representative receiver locations were selected based on proximity (highest potential noise impact) to the construction and demolition work. A fifth residential location was assessed for the following phases of construction: Parking Lot 4.1 Demolitions; MOB Construction; and Mercy Manor Demolition. Figure 5.6-5, *Receiver Locations for Construction Phase Impact Analysis*, shows the four receiver locations nearest to the center of the project site at which maximum construction sound levels were monitored. The respective sound levels at each of the four receiver locations nearest to the center of the project site based on the equipment scheduled for each construction phase is summarized below in Table 5.6-7, *Summary of Average Construction Noise Levels at Measured Receiver Locations*.

As shown in Table 5.6-7, noise levels would exceed City of SDMC during several phases resulting in a significant noise impact associated with construction. Most exceedances occur during demolition phases. In order to meet City standards and reduce impacts to below a level of significance, mitigation measures would be required. Specific implementation of these noise control measures, with planning and oversight by a qualified acoustic consultant, would reduce significant construction noise impacts to below a level of significance.

Vibration

Groundborne vibration can transmit through building structures and can potentially be felt by occupants. In more extreme cases, groundborne vibration can cause damage to buildings. Peak particle velocity (PPV) is a measure of vibration magnitude commonly used to characterize

groundborne vibration from construction equipment. Activities associated with the operation of hospital and office facilities are not high impact and thus, do not generate perceptible vibration. Thus, this discussion focuses on temporary vibration caused by construction.

Assessment for potential of building damage and human annoyance is based on guidelines in the Caltrans Transportation and Construction Vibration Guidance Manual, and summarized below in Table 5.6-8, *Vibration Damage Potential Threshold Criteria*, and Table 5.6-9, *Vibration Annoyance Potential Criteria*. "Transient Sources" refer to single, isolated events such as blasting and ball drops. "Continuous/Frequent Intermittent Sources" refer to most other construction activities, and characteristic of the activity/equipment types planned for the project. For the purposes of this assessment, "distinctly perceptible" vibrations (0.25 inches/sec for transient sources of 0.10 inches/sec for continuous/frequent intermittent sources) were considered to be the threshold of acceptability for construction projects near sensitive receive locations.

Typical groundborne vibration levels, or PPV, for each type of construction equipment are based on data provided by the FTA, and is summarized below in Table 5.6-10, *Typical Construction Equipment Vibration Velocities*. Groundborne vibration due to construction activity is predicted as follows:

1. Construction equipment is tabulated in Table 5.6-10 along with typical groundborne vibration for each equipment type at a 25-foot reference distance.
2. For each construction phase, the highest groundborne construction vibration amplitude of all equipment used in that phase is identified for use in predicting a typical worst-case groundborne construction vibration at each receiver location.
3. For each receiver and each construction phase, the highest vibration velocity (PPV) is tabulated and compared with the vibration impact criteria in Tables 5.6-7 and 5.6-8.

Impact piling and blasting typically produce the most significant vibration of all construction activities. Project construction would utilize either drilled piles with no impact or vibratory piling. No impact piling blasting activity is planned.

Maximum predicted groundbourne construction vibration for the four closest receiver locations for each construction phase was tabulated and is summarized below in Table 5.6-11, *Projected Construction Vibration by Phase*.

As shown above, certain phases would exceed the "barely perceptible" human vibration perception threshold of 0.01 PPV, but remain under the "distinctly perceptible" threshold of 0.04 PPV. A summary of potential perception by nearby receivers is presented below:

- Receiver #1: Groundborne vibration is predicted to be below "barely perceptible" impact criteria for all construction phases.
- Receiver #2: Groundborne vibration is predicted to be above "barely perceptible" impact criteria, but below the "distinctly perceptible" impact criteria during Sixth Avenue, BHU Demo,

MRH, HSB, and Ed Demo Ambulance phases.

- Receiver #3: Groundborne vibration is predicted to be below "barely perceptible" impact criteria for all construction phases.
- Receiver #4: Groundborne vibration is predicted to be below "barely perceptible" impact criteria for all construction phases.

The predicted construction groundborne vibration at the four receivers is well below impact thresholds for potential building damage. Several receivers are predicted to be subject to "barely perceptible" vibration during some construction phases.

Specialized equipment for research, medical diagnostics, and microelectronics manufacturing can be adversely affected by vibration at levels well below human perception threshold. No facilities containing such sensitive equipment in the vicinity of the project site have been identified.

There are no requirements in the City of San Diego Municipal Code specific to construction vibration impact. Assessment for potential of building damage and human annoyance is based on guidelines in the Caltrans Transportation and Construction Vibration Guidance Manual (Chapter 7.3), summarized in Table 5.6-8 and Table 5.6-9. For the purposes of this assessment, "Distinctly perceptible" vibrations (0.25 inches/sec for transient sources or 0.10 inches/sec for continuous/frequent intermittent sources) are used as the threshold of acceptability for construction projects near sensitive receiver locations.

Vibration due to construction activity would not result in distinctly perceptible levels (as defined in the Caltrans transportation and Construction Vibration Guidance Manual) to nearby receiver locations.

Operational Noise

Exterior Traffic Noise

Traffic is the primary noise source that would be generated by the project. As shown in Table 5.6-1, existing measured noise levels in the project area exceed the 65 dBA residential standard. Table 5.6-12, *Projected Vehicular Traffic Noise Impacts*, shows projected vehicular traffic noise resulting from the project as well as forecasts for the year 2035.

As shown in Table 5.6-12, projected noise levels from traffic would exceed existing conditions. For these receivers, the resulting increase in CNEL level is related to the increase in general traffic volumes. For most receivers, the increase is small and would not be noticeable. However, the ADT for Receiver 1 (at the portion of Fourth Avenue, north of the project site) increases from 7,282 to 28,450, including the 15,600 ADT for the project. This project-related increase in traffic would result in a significant noise impact at Receiver 1.

Future CNELs at building façades are not expected to exceed “conditionally compatible” levels indicated in the San Diego General Plan. Sound insulating façade constructions would need to be incorporated into the building envelope designs to attenuate exterior noise to indoor noise levels below limits set forth in the general plan (45 CNEL for the Hospital and 50 CNEL for medical office and support buildings).

Building Systems

The new campus buildings would include a range of building systems units including air handlers, exhaust fans, cooling towers, condensers, emergency generators, etc. Many of these units would be located at building rooftops, as well as at the Hospital mechanical floor. Final equipment selection and noise data are not available at this time. However, the preliminary design included sound power limits for air handler unit (AHU) air intake as described in Table 5.6-13, *Preliminary Hospital Air Handler Intake Limiting Levels*. Attenuation levels for typical acoustic louvers are provided in Table 5.6-14, *Octave Band Insertion Loss (sound attenuation) Levels for Typical Acoustic Louver Product*.

Building systems would be designed to incorporate acoustic louvers, ducted silencers, and barrier walls to ensure radiated noise does not exceed noise ordinance limits at the property lines or result in significant noise impacts at existing buildings on the Scripps campus. These sound attenuation measures would be specified based on building systems’ manufacturer-provided sound power levels, architectural elements, and relative distances between equipment and NSLUs.

The nearest anticipated NSLU at the property line is “The Warwick” apartment complex at the south side of the campus. The Hospital mechanical floor intake louvers would be approximately 100 feet away from the nearest apartment. With acoustic louver, the noise level at the nearest apartment complex resulting from the planned air handlers would not exceed 48dBA; this does not exceed the SDMC commercial zone limit of 60dBA. If producing a level of 48 dBA constantly over a 24-hour period, the maximum resulting CNEL would be 55 CNEL, which is below the City’s significance threshold of 65 CNEL. No significant impacts would result.

Helicopter Noise

The project’s proposed heliport would be designed to accommodate helicopters up to and including Sikorsky UH-60 Black Hawk type helicopters and variants, with an overall length of 65 feet and max gross takeoff weight of 22,000 lbs. The helicopter planning consultation (Heliplanners) has indicated that the majority of the helicopters using the Scripps Mercy Hospital heliport would however, continue to be the same approximately 42-foot-long, 9,000-pound models used today. Larger UH-60 and similar helicopters would be used for no more than five percent of helicopter visits to the Scripps Mercy Hospital heliport; they would only be used when emergency responders or firefighters are injured in the line of duty, during mass casualty events, or for training flights. The approach, landing, and departure of these larger helicopters would result in an approximate 2 dBA increasing Sound Exposure Levels for the total event.

Flights per day to the proposed heliport would not be expected to increase compared to the current operations. The emergency department's bed capacity would not be increasing; therefore, helicopter flights to the hospital would not be expected to increase.

Projected helicopter noise was calculated using noise data for the largest helicopter and loudest potential noise levels at the Scripps Mercy Hospital heliport. Table 5.6-15, *Projected Helicopter Traffic Noise*, shows projected noise for the current (south-west and north-east) and two future (south-west and east flight paths). The results are shown for the two nearest sensitive receivers, being "The Warwick" apartment on the southside of the campus and the residences north of Mercy Canyon. These receivers are represented by modeled locations 2, 3, 6, 7, and 8 (refer to Figure 5.6-2).

As shown in Table 5.6-15, planned changes to helicopter flight paths for the new campus are expected to result in less than a 2-dBA increase in CNELs at NSLUs impacted most by helicopters traveling to the campus. Per the City Thresholds (2016), this does not present a significant noise impact to nearby NSLUs.

Larger, louder helicopter visits will be infrequent (approximately once every 20 days) and would not significantly impact CNELs. However, the individual noise event resulting from larger helicopter visits would result in SEL increases of approximately 2 dBA compared to current helicopter visits; while this would be considered a noticeable difference, this does not constitute a significant impact.

Significance of Impacts

Construction

The project requires mitigation measures to be implemented to attenuate noise during construction such that levels do not exceed City requirements at buildings both inside and outside the property line. With implementation of mitigation measures, impacts would be less than significant.

Vibration

The projected vibration would be well below the thresholds for potential building damage as outlined on Table 5.6-8. Receivers that experience vibration during some construction phases are predicted to be at the "barely perceptible" level and would not be significant.

Operation

Traffic noise impacts at Receiver 1 would be significant.

Building systems would be designed to incorporate acoustic louvers, ducted silencers, and barrier walls to ensure that radiated noise does not exceed noise ordinance limits at the property lines. Impacts related to building systems would be less than significant.

Planned changes to helicopter flight paths for the project would result in less than a 2-dB increase in CNELs at NSLUs impacted most by helicopters traveling to the Scripps Mercy Campus (see Table 5.6-13). Impacts related to helicopter noise would be less than significant.

Mitigation Measures

Construction Noise

MM 5.6-1: The following measures shall be planned and reviewed by a qualified acoustic consultant to limit noise levels to meet requirements of the SDMC. These measures shall be applied to all phases of the project site demolition and construction work.

- Ensure that all equipment items have the manufacturers' recommended noise abatement measures, such as mufflers, engine covers, and engine vibration isolators intact and operational.
- Turn off idling equipment, whenever possible.
- Construction activities shall be limited to daytime hours, 7 a.m. to 7 p.m. No noise generating construction activities shall take place on Sundays and holidays.
- Include in tenders, employment contracts, subcontractor agreements and work method statements clauses that assure the minimization of noise and compliance with directions from management to minimize noise.
- Give preference to the use quieter technology or other measures rather than lengthening construction duration (i.e. it is not recommended to lower noise by having fewer pieces of equipment running at a time thereby leading to extended construction duration).
- Regularly train workers and contractors (such as at toolbox talks) to use equipment in ways that minimize noise.
- Ensure that site managers periodically check the site, nearby residences and other sensitive receptors for noise problems so that solutions can be quickly applied.
- Keep truck drivers informed of designated vehicle routes, parking locations, acceptable delivery hours and other relevant practices (e.g. minimizing the use of engine brakes and periods of engine idling).
- Consider alternatives to diesel and gasoline engines and pneumatic units such as hydraulic or electric-controlled units where, feasible and reasonable.
- Examine and implement, where feasible and reasonable, alternatives to pile driving using a diesel hammer, such as hydraulic hammer, hydraulic press-in, or vibratory piledriver.
- To reduce the impact of backup alarms, examine and consider implementing, where feasible and reasonable, ambient sensitive back-up alarms, signal workers, turning circles and side loading/unloading trucks.
- To reduce the line-of-sight noise transmission to residences and other sensitive receptors, temporary noise barriers shall be erected as required prior to demolition

of the Parking Lot 4.1, Behavioral Health Building, 550 Washington Street, Emergency Department, Existing Hospital, and Facility and Generator Building, and prior to construction of MOB, Hospital I, Hospital Support Building, and Mercy Manor.

- Temporary noise barriers can be constructed from boarding (plywood boards, panels of steel sheeting or compressed fiber cement board) with no gaps between the panels at the site boundary. Stockpiles and shipping containers can also be used as effective noise barriers.
- Planned barrier type, height, and placement shall be outlined in a Noise Report prepared by a qualified acoustic consultant at the time of issuance of building permits for the aforementioned buildings.
- A qualified noise monitor shall be on-site in areas identified for noise barriers to ensure that noise levels are reduced to meet City standards.

Significance of Impacts Following Implementation of Mitigation Measures

Implementation of MM 5.6-1 would reduce construction noise impacts to less than significant. Impacts relative to operational traffic noise would remain significant and unmitigated.

Operational Noise

There is no standard procedure to ensure that increased traffic noise outside the project bounds affecting existing NSLUs is sufficiently attenuated to meet City standards. Therefore, there are no feasible mitigation measures to reduce this traffic noise level to a less than significant impact. Impacts related to traffic noise at Fourth Avenue would remain significant and unmitigable.

5.6.3.2 Issue 3 and Issue 4

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

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

Impact Threshold

Based on the City's CEQA Significance Determination Threshold, a project would have a potentially significant noise impact if it would result in:

- Exposure of people to transportation noise levels that exceed the sound level limits as presented in Table K-2 of the City's Significance Determination Thresholds and as identified in Table 5.6-5, *Traffic Noise Significance Thresholds*.

Analysis

As evaluated under Issue 1 and Issue 2, the traffic noise increase due to the project is expected to be significant at Receiver 1 (located along Fourth Avenue), which is expected to increase from the current 73.7 CNEL to 77.0 CNEL.

As discussed in Section 5.1.3.4, the project site is located within Review Area 1 of the AIA for the SDIA ALUCP and is within the Airspace Protection Boundary and the Overflight Area Boundary. The project site is not within the noise contours identified on the Noise Contour Map (see Figure 5.1-3, *SDIA Noise Contour Map*). Noise from SDIA would not be expected to exceed 60 dBA CNEL. The project would be compatible with the ALUCP noise regulations, and no impacts would result due to aircraft noise from operations.

Significance of Impacts

The project would result in a significant increase in traffic.

The project would not cause exposure of people to current or future noise levels which exceed standards established in an adopted airport Comprehensive Land Use Plan.

Mitigation Measures

Relative to the operational traffic noise impact, there is no standard procedure to ensure that exterior noise affecting existing NSLUs is sufficiently attenuated to meet City standards. Therefore, there are no feasible mitigation measures to reduce this traffic noise level to a less than significant impact. Impacts related to traffic noise at Fourth Avenue would remain significant and unmitigable.

Table 5.6-1. Existing Vehicular Traffic Noise

Receiver Location	AM Peak (Leq, 1-hr)	PM Peak (Leq, 1-hr)	CNEL
1	71.5	69.1	73.7
2	60	60.2	62.1
3	62.2	62.4	64.4
4	65.6	65.9	68.1
5	68.5	69.5	72.0
6	57.4	58.1	60.5
7	66.3	67	69.5
8	68.3	69.1	71.0
9	68.8	69.3	72.0
10	77.4	78.1	80.4
11	67.7	69.3	72.1
12	67.3	68.1	71.0
13	72.9	73.7	76.4
14	72.8	73.8	76.5
15	77	77.3	79.5

Table 5.6-2. Existing Helicopter and Traffic Noise

Receiver	Existing Flightpath (NE) $L_{Aeq,1hr}$	Existing Flightpath (SW) $L_{Aeq,1hr}$	Existing CNEL (Traffic Only) CNEL
2	65.1	61.9	62.1
3	59.3	53.3	64.4
6	47.3	63.9	60.5
7	47.3	49.0	69.5
8	44.3	54.1	71.0

Table 5.6-3. Common Noise Levels

Sound Source	dBA
Military jet, air raid siren	130
Amplified rock music	110
Jet takeoff at 330 feet, or a passing subway train from a subway platform	100
Freight train at 100 feet	95
Train horn at 100 feet	90
Heavy truck or lawn mower at 50 feet	90
Busy city street or loud shout	80
Highway traffic at 50 feet, train	70
Predominantly industrial area	60
Light car traffic at 50 feet, city or commercial areas or residential areas close to industry	60
Background noise in an office	50
Suburban areas with medium density transportation	50
Public library	40
Soft whisper at 16 feet	30
Threshold of hearing	0

Note: A 10 dBA increase in level appears to double the loudness, and a 10 dBA decrease halves the apparent loudness.

Table 5.6-4. City of San Diego Applicable Limits

Land Use	Time of Day	One-Hour Average Sound Level (decibels)
1. Single Family Residential	7 a.m. to 7 p.m.	50
	7 p.m. to 10 p.m.	45
	10 p.m. to 7 a.m.	40
2. Multi-Family Residential (up to a maximum density of 1/2000)	7 a.m. to 7 p.m.	55
	7 p.m. to 10 p.m.	50
	10 p.m. to 7 a.m.	45
3. All other Residential	7 a.m. to 7 p.m.	60
	7 p.m. to 10 p.m.	55
	10 p.m. to 7 a.m.	50
4. Commercial	7 a.m. to 7 p.m.	65
	7 p.m. to 10 p.m.	60
	10 p.m. to 7 a.m.	60
5. Industrial or Agricultural	any time	75

Source: City of SDMC Section 59.5.0401, 2010

Table 5.6-5. Traffic Noise Significance Thresholds (dBA CNEL)

Structure or Proposed Use That Would Be Impacted By Traffic Noise	Interior Space	Exterior Useable Space ¹
Single-family detached	45 dB	65 dB
Multi-family, schools, libraries, hospitals, daycare, hotels, motels, parks, convalescent homes	Development Services Department (DSD) ensures 45 dB pursuant to Title 24	65 dB
Offices, churches, business, professional use	N/A	70 dB
Commercial, retail, industrial, outdoor spectator sports uses	N/A	75 dB

Source: City of San Diego Traffic Noise Significance Thresholds, 2016

¹If a project is currently at or exceeds the significance thresholds for traffic noise described above and noise levels would result in less than a 3-dB increase, then the impact is not considered significant.

Table 5.6-6. Typical Construction Equipment Noise Levels

Equipment Onsite	Typical Level (dBA) 50 feet from the source
Air Compressor	81
Backhoe	80
Compactor	82
Concrete Mixer	85
Concrete Pump	82
Concrete Vibrator	76
Mobile Crane	83
Loader	85
Truck	88
Grader	85
Piles (Drilled)*	81
Excavator	81
Generator	81
Welding Machine**	60
Impact Wrench	85
Jack Hammer	88
Pneumatic Tool	85
Saw	76
Forklift***	68

*Similar to an excavator

**Based on OSHA dosimeter data

***Based on [The Measurement of Sound Levels in Construction](#)

**Table 5.6-7. Summary of Average Construction Noise Levels
 at Measured Receiver Locations**

Construction Phase	Receiver Location	L _{eq} for Phase (dBA)
Parking Lot 4.1 Demolition	1	73
	2	69
	3	67
	4	69
	5	81 ¹
MOB Construction	1	65
	2	61
	3	59
	4	61
	5	73
BHU Building Demolition	1	71
	2	83¹
	3	72
	4	71
550 Washington Demolition	1	66
	2	80¹
	3	75
	4	73
Hospital I HSB Construction	1	69
	2	81¹
	3	70
	4	69
Emergency Department Demolition	1	72
	2	80¹
	3	76¹
	4	77¹
Existing Hospital Demolition	1	71
	2	75
	3	70
	4	72
Mercy Manor Demolition	1	80¹
	2	69
	3	66
	4	67
	5	74
Central Energy Plant Expansion	1	68
	2	70

Construction Phase	Receiver Location	L _{eq} for Phase (dBA)
	3	62
	4	62
Facility and Generator Building Demolition	1	77
	2	72
	3	67
	4	67
Hospital II Construction	1	66
	2	67
	3	64
	4	66

¹ Predicted average noise level -would require implementation of measures presented above in Section 5.6.3.1 to meet City standards.

Table 5.6-8. Vibration Damage Potential Threshold Criteria

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

Table 5.6-9. Vibration Annoyance Potential Criteria

Human Response	Maximum PPV (inches/second)	
	Transient Sources	Continuous/Frequent Intermittent Sources
Barely perceptible	0.04	0.01
Distinctly perceptible	0.25	0.04
Strongly perceptible	0.9	0.10
Severe	2.0	0.4

Table 5.6-10. Typical Construction Equipment Vibration Velocities

Equipment Onsite	Typical Level (dBA) 50 feet from the source
Air Compressor	--
Backhoe	0.088
Compactor	0.21
Concrete Mixer	0.076
Concrete Pump	0.076
Concrete Vibrator	--
Mobile Crane	0.008
Loader	0.089
Truck	0.076
Grader	0.089
Piles (Drilled)	0.089
Excavator	0.089
Generator	--
Welding Machine	--
Impact Wrench	--
Jack Hammer	0.035
Pneumatic Tool	--
Saw	--
Forklift	--

Table 5.6-11. Project Construction Vibration by Phase

Construction Phase	Construction Vibration (PPV inches/second)			
	Receiver 1	Receiver 2	Receiver 3	Receiver 4
4.1 Parking Demolition	0.003	0.002	0.002	0.002
MOB Construction	0.008	0.005	0.004	0.005
BHU Demolition	0.002	0.010	0.002	0.002
550 Demolition	0.002	0.009	0.005	0.004
MRH & HSB Construction	0.005	0.023	0.006	0.006
ED Demolition	0.005	0.012	0.008	0.009
Existing Hospital Demolition	0.002	0.004	0.002	0.003
Mercy Manor Demolition	0.009	0.002	0.002	0.002
CEP Expansion	0.008	0.010	0.004	0.004
Fac. And Gen. Demolition	0.005	0.003	0.001	0.001
Hospital II Construction	0.006	0.007	0.005	0.006

Table 5.6-12. Projected Vehicular Traffic Noise

Receiver Location	Existing CNEL	Project CNEL	Forecast 2035 + Project	dB CNEL Increase	Significant Impact?
1	73.7	74.1	77.0	3.3	YES
2	62.1	46.0	63.4	1.3	NO
3	64.4	49.0	65.7	1.3	NO
4	68.1	54.7	69.2	1.1	NO
5	72.0	67.4	73.3	1.3	NO
6	60.5	47.1	61.2	0.7	NO
7	69.5	54.6	70.0	0.5	NO
8	71.0	57.1	71.7	0.7	NO
9	72.0	58.4	72.4	0.4	NO
10	80.4	67.6	81.1	0.7	NO
11	72.1	59.0	73.6	1.5	NO
12	71.0	62.6	72.0	1.0	NO
13	76.4	62.8	77.3	0.9	NO
14	76.5	61.7	77.0	0.5	NO
15	79.5	58.7	81.4	1.9	NO

Table 5.6-13, Preliminary Hospital Air Handler Intake Limiting Levels

Limiting Octave Band Sound Power Levels (dB re10-12 W)								
	63Hz	125 Hz	250 Hz	500 Hz	1 kHz	2 kHz	4kHz	8kHz
Air Handler Unit (AHU)	95	95	95	95	95	95	91	87

Hz -hertz

kHz-kilohertz

Table 5.6-14, Octave Band Insertion Loss (Sound Attenuation) Levels for Typical Acoustic Louver Product

Octave Band Insertion Loss (dB)								
	63Hz	125 Hz	250 Hz	500 Hz	1 kHz	2 kHz	4kHz	8kHz
Acoustic Louver	10	13	15	19	22	23	24	24

Hz -hertz

kHz-kilohertz

Table 5.6-15. Projected Helicopter Traffic Noise

Receiver	Existing Flightpath (NE) L _{Aeq,1hr}	Existing Flightpath (SW) L _{Aeq,1hr}	Existing (Traffic only) CNEL	Existing (Traffic + Flightpath) CNEL	Future Flightpath (East) L _{Aeq,1h}	Future Flightpath (South-west) L _{Aeq,1h}	Forecast 2035 + Project CNEL
2	65.1	61.9	62.1	62.4	59.2	50.9	63.4
3	59.3	53.3	64.4	64.5	55.1	44.7	65.7
6	47.3	63.9	60.5	60.9	65.0	69.0	61.2
7	47.3	49.0	69.5	69.5	64.5	57.9	70.0
8	44.3	54.1	71.0	71.0	54.2	58.8	71.7

Table 5.6-16, San Diego General Plan Noise Element Table NE-5 Typical Noise Attenuation Methods to Insulate the Noise Receiver

Noise Level Reduction	Typical Mitigation Methods
15-20 dBA	<i>Mitigation 1, 2, and 3</i> 1. Air conditioning or mechanical ventilation. 2. Double -paned glass. 3. Solid core doors with weather stripping and ` seals.
20-25 dBA	<i>Mitigation 1,2, and 3 plus</i> 4.Stucco or brick veneer exterior walls or wood siding with one-half inch thick fiberboards underlayer. 5. Glass portions of window/doors not to exceed 20 percent. 6. Exterior vents fain noise source shall be baffled.
25-30 dBA	<i>Mitigation 1 through 6 plus</i> 7. Interior sheetrock or exterior wall attached to studs by resilient channels or double walls. 8. Window assemblies, doors, wall construction materials, and insulation shall have a lab-tested STC rating of 30 or greater.

Table 5.6-17, San Diego General Plan Noise Element Table NE-6 Potential Noise Attenuation Methods

Reducing the Source Noise*
<i>Traffic Noise</i>
Traffic Calming/Traffic Management Techniques
Low-Noise Road Pavement Surfaces
<i>Commercial and Industrial Noise</i>
Sound insulation of buildings, for walls, windows, door, opening, ventilations, etc.
Screen and Enclosures
Silencers, attenuators, or mufflers in connection with rotating machinery and ducts/pipes leading to and from building
Limiting of noise-producing operations
<i>Interrupted the Noise Path*</i>
Landscaped Berms
Natural Land Forms
Noise-Compatible Structures/Buildings
Landscaping/Vegetation
Walls
<i>Separating the Noise Source*</i>
Provide distance buffer between the noise source and the noise-sensitive use
Locate noise-compatible uses such as vehicle parking, open spaces, or commercial uses between the noise source and the noise-sensitive areas
<i>Insulate the Noise Receiver</i>
Refer to Table NE-5

*These methods are not applicable for aircraft noise

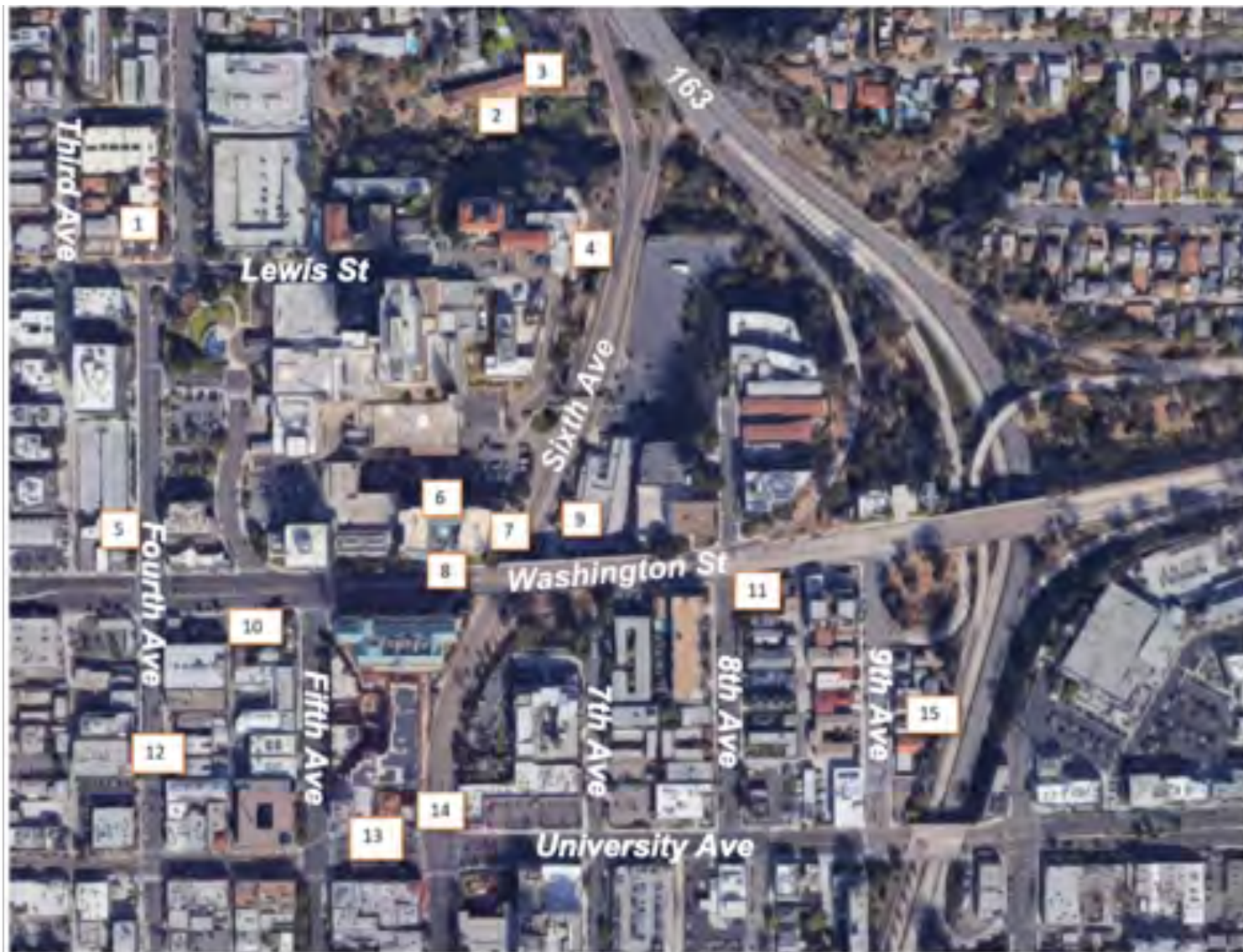


Figure 5.6-1. Traffic and Helicopter Noise Modeling Receiver Locations

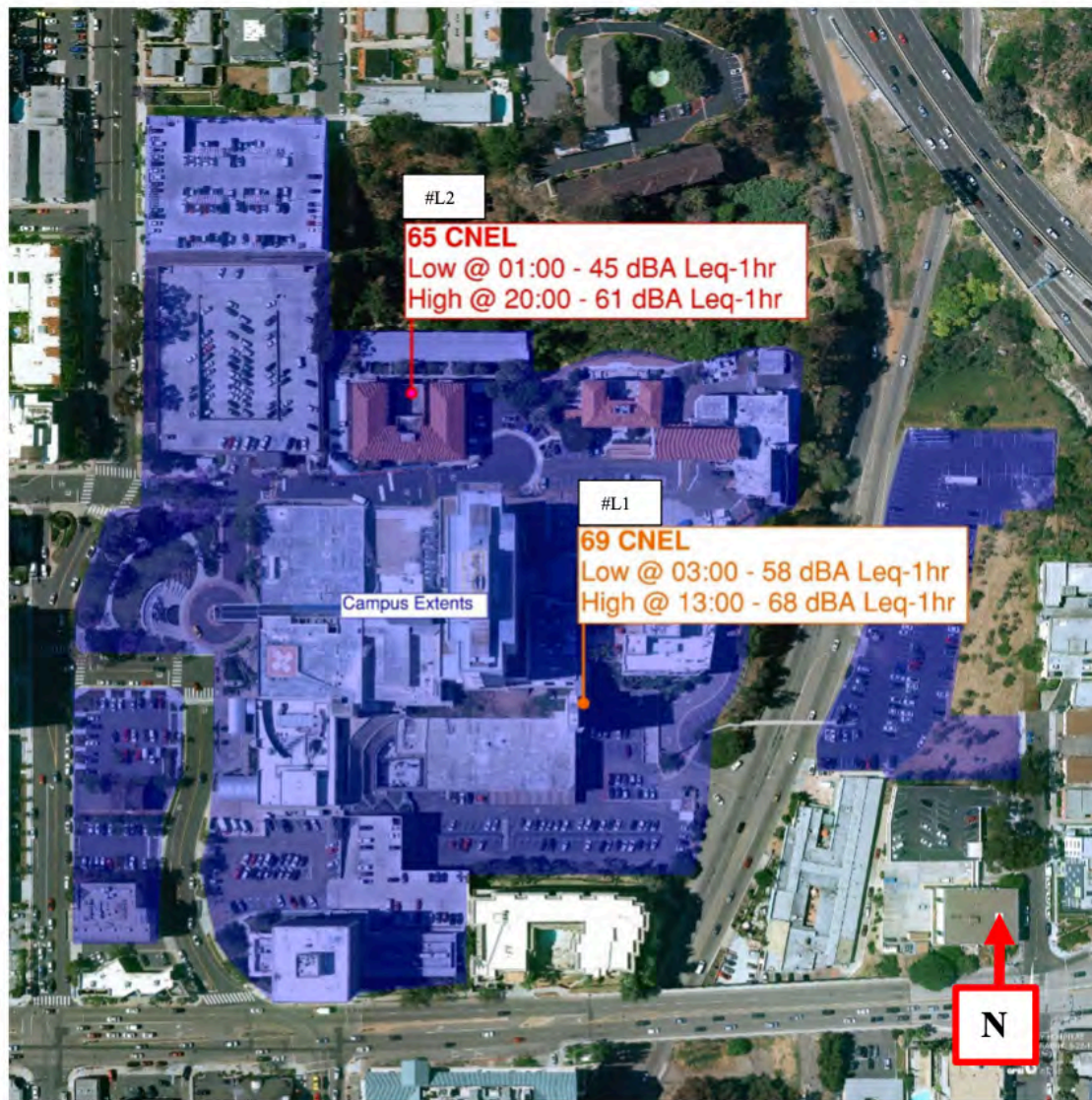
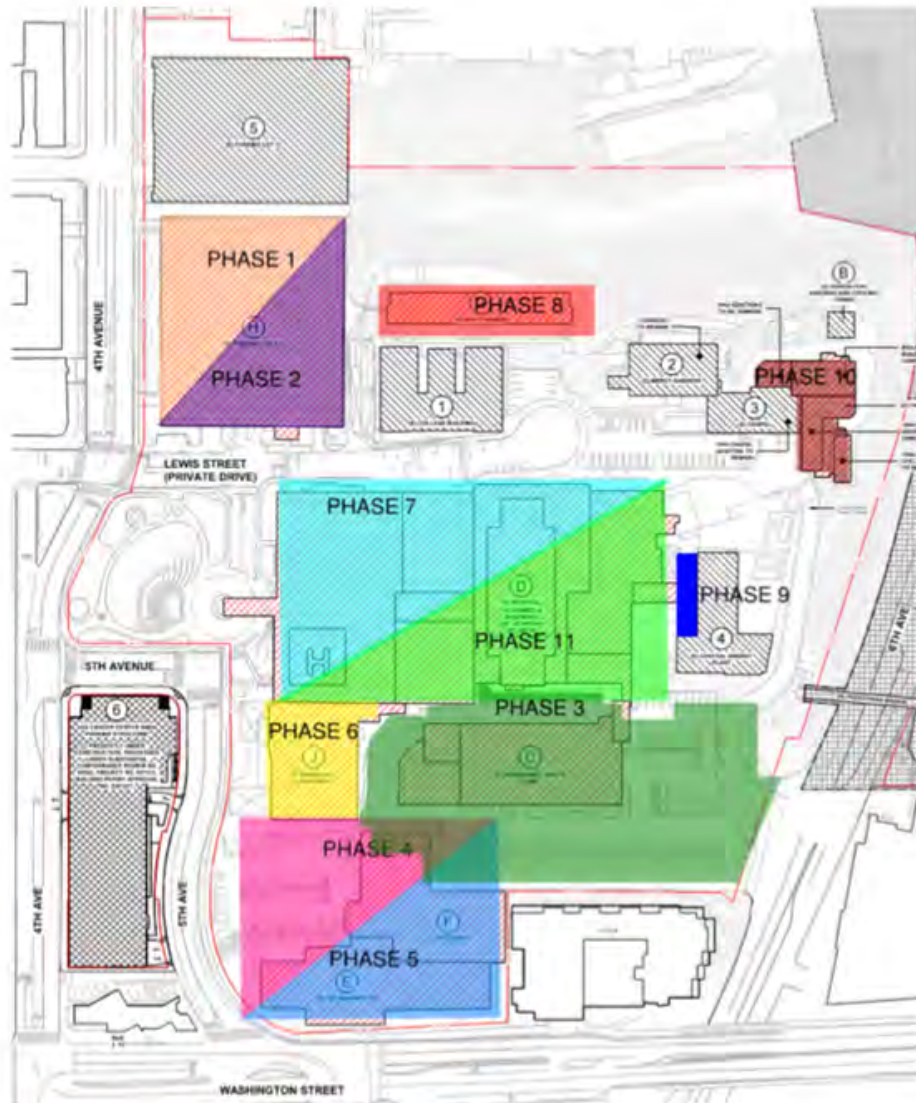


Figure 5.6-2. Ambient Noise Monitoring Locations



Figure 5.6-3. Spot Measurement Monitoring Locations



Phase	Construction Phasing	Date
1	Parking Lot 4.1 Demolition	Nov 2022 - Mar 2023
2	MOB Construction	Apr 2023 – Dec 2024
3	Behavioral Health Building Demolition	Oct 2023 – Mar 2024
4	550 Washington Building Demolition	Jan 2025 – Jul 2025
5	Hospital I and Hospital Support Building Construction	Apr 2024 – Mar 2028
6	Emergency Department Demolition	Mar 2029 - Oct 2029
7	Existing Hospital Demolition	Mar 2029 – April 2030
8	Mercy Manor Demolition	2030
9	Central Energy Plant Expansion	2031-2032
10	Facility and Generator Building Demolition	2033
11	Hospital II Construction	2034-2038

Figure 5.6-4. Project Phasing Plan



Figure 5.6-5. Receiver Locations for Construction Impact Analysis

5.7 Greenhouse Gas Emissions

This section evaluates potential greenhouse gas emissions-related impacts associated with the project. The following discussion is based on the *Climate Action Plan Consistency Checklist* prepared by KLR Planning (June 2022), attached as Appendix C.

5.7.1 Existing Conditions

5.7.1.1 Background

Global Climate Change (GCC) refers to any significant change in measures of climate, such as temperature, precipitation, or wind patterns that last for an extended period of time. The earth's temperature depends on the balance between energy entering and leaving the planet's system. Many factors, both natural and human, can cause changes in earth's energy balance, including variations in the sun's energy that reaches Earth, changes in the reflectivity of Earth's atmosphere and surface, and changes in the greenhouse effect, which affects the amount of heat retained by Earth's atmosphere.

The greenhouse effect is the trapping and buildup of heat in the atmosphere (troposphere) near the earth's surface. The greenhouse effect traps heat in the troposphere through a threefold process as follows: short-wave radiation emitted by the sun is absorbed by the earth, the earth emits a portion of this energy in the form of long-wave radiation, and GHGs in the upper atmosphere absorb this long-wave radiation and emit it into space and toward earth. The greenhouse effect is a natural process that contributes to regulating the earth's temperature.

Human activities that emit additional GHGs to the atmosphere increase the amount of infrared radiation absorbed before escaping into space; thus, enhancing the greenhouse effect and causing the earth's surface temperature to rise. The scientific record of the earth's climate shows that the climate system varies naturally over a wide range of time scales, and that in general, climate changes prior to the Industrial Revolution in the 1700s can be explained by natural causes, such as changes in solar energy, volcanic eruptions, and natural changes in GHG concentrations. However, recent climate changes, specifically the warming observed over the past century, cannot be explained by natural causes alone. Rather, human activity may have been the dominant cause of warming since the mid-twentieth century and are thought to be a significant driver of observed climate change. Human influence on the climate system is evident from the increasing GHG concentrations in the atmosphere, positive radiative forcing, observed warming and improved understanding of the climate system. The atmospheric concentrations of GHGs have increased primarily from fossil fuel emissions and secondarily from emissions associated with land use changes. Continued emissions of GHGs may cause further warming and changes in all components of the climate system.

GCC and GHGs have been at the center of a widely-contested political, economic, and scientific debate. Although the conceptual existence of GCC is generally accepted, the extent to which GHGs generally and anthropogenic-induced GHGs contribute to it remains a source of debate. The State of California has been at the forefront of developing solutions to address GCC.

The United Nations Intergovernmental Panel on Climate Change (IPCC) constructed several emission trajectories of GHGs needed to stabilize global temperatures and climate change impacts. The IPCC concluded that a stabilization of GHGs at 400 to 450 ppm carbon dioxide (CO₂) equivalent concentration is required to keep global mean warming below 3.6° Fahrenheit (2° Celsius), which is assumed to be necessary to avoid dangerous climate change.

State law defines greenhouse gases as any of the following compounds: CO₂, methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF₆) [California Health and Safety Code Section 38505(g)]. CO₂, followed by CH₄ and N₂O, are the most common GHGs that result from human activity.

5.7.1.2 Sources and Global Warming Potentials of GHG

Anthropogenic sources of CO₂ include combustion of fossil fuels (coal, oil, natural gas, gasoline, and wood). CH₄ is the main component of natural gas and also arises naturally from anaerobic decay of organic matter. Accordingly, anthropogenic sources of CH₄ include landfills, fermentation of manure, and cattle farming. Anthropogenic sources of N₂O include combustion of fossil fuels and industrial processes such as nylon production and production of nitric acid. Other GHGs are present in trace amounts in the atmosphere and are generated from various industrial or other uses.

GHGs have varying global warming potential (GWP). The GWP is the potential of a gas or aerosol to trap heat in the atmosphere; it is the “cumulative radiative forcing effect of a gas over a specified time horizon resulting from the emission of a unit mass of gas relative to a reference gas” (EPA 2006). The reference gas for GWP is CO₂; therefore, CO₂ has a GWP of one. The other main greenhouse gases that have been attributed to human activity include CH₄, which has a GWP of 28, and N₂O, which has a GWP of 265. Table 5.71, *Global Warming Potentials and Atmospheric Lifetimes of GHGs*, presents the GWP and atmospheric lifetimes of common GHGs. In order to account for each GHG's respective GWP, all types of GHG emissions are expressed in terms of CO₂ equivalents (CO₂e) and are typically quantified in metric tons (MT) or millions of metric tons (MMT).

CARB compiled a statewide inventory of anthropogenic GHG emissions and sinks that includes estimates for CO₂, CH₄, N₂O, SF₆, HFCs, and PFCs, and is summarized in Table 5.7-2, *State of California GHG Emissions by Sector*. Data sources used to calculate this GHG inventory include California and federal agencies, international organizations, and industry associations. The calculation methodologies are consistent with guidance from the IPCC. The 1990 emissions level is the sum total of sources and sinks from all sectors and categories in the inventory. The inventory is divided

into seven broad sectors and categories in the inventory: Agriculture, Commercial, Electricity Generation, Forestry, Industrial, Residential, and Transportation.

In its Climate Action Plan, the City identified the 2010 baseline for GHG emissions of 13,091,591 million metric tons equivalent CO₂ (MT CO₂e). Based on the community-wide emissions inventory, 55 percent of the baseline emissions are attributable to transportation, 23 percent are attributable to electricity use, 17 percent are attributable to natural gas use, and five percent are attributable to solid waste and wastewater handling and treatment.

5.7.1.3 Typical Adverse Effects

The Climate Scenarios Report (2006) uses a range of emissions scenarios developed by the IPCC to project a series of potential warming ranges (i.e., temperature increases) that may occur in California during the 21st Century. Three warming ranges were identified: lower warming range (3.0 °F to 5.5 °F); medium warming range (5.5 to 8.0 °F); and higher warming range (8.0 °F to 10.5 °F). The Climate Scenarios Report then presents an analysis of the future projected climate changes in California under each warming range scenario.

According to the report, substantial temperature increases would result in a variety of impacts to the people, economy, and environment of California. These impacts would result from a projected increase in extreme conditions, with the severity of the impacts depending upon actual future emissions of GHGs and associated warming. These impacts are described below.

Public Health

Higher temperatures are expected to increase the frequency, duration, and intensity of conditions conducive to air pollution formation. For example, days with weather conducive to O₃ formation are projected to increase by 25 to 35 percent under the lower warming range and 75 to 85 percent under the medium warming range. In addition, if global background O₃ levels increase as is predicted in some scenarios, it may become impossible to meet local air quality standards. An increase in wildfires could also occur, and the corresponding increase in the release of pollutants including PM_{2.5} could further compromise air quality. The Climate Scenarios Report indicates that large wildfires could become up to 55 percent more frequent of GHG emissions are not significantly reduced.

Potential health effects from GCC may arise from temperature increases, climate-sensitive diseases, extreme events, and air quality. There may be direct temperature effects through increases in average temperature leading to more extreme heat waves and less extreme cold spells. Those living in warmer climates are likely to experience more stress and heat-related problems (e.g., heat rash and heat stroke). In addition, climate sensitive diseases (such as malaria, dengue fever, yellow fever, and encephalitis) may increase, such as those spread by mosquitoes and other disease-carrying insects.

Water Resources

A vast network of reservoirs and aqueducts capture and transport water throughout the State from northern California rivers and the Colorado River. The current distribution system relies on Sierra Nevada mountain snowpack to supply water during the dry spring and summer months. Rising temperatures, potentially compounded by decreases in precipitation, could severely reduce spring snowpack, increasing the risk of summer water shortages. In addition, if temperatures continue to rise more precipitation would fall as rain instead of snow, further reducing the Sierra Nevada spring snowpack by as much as 70 to 90 percent. The State's water resources are also at risk from rising sea levels. An influx of seawater would degrade California's estuaries, wetlands, and groundwater aquifers.

Agriculture

Increased GHG and associated increases in temperature are expected to cause widespread changes to the agricultural industry, reducing the quantity and quality of agricultural products statewide. Significant reductions in available water supply to support agriculture would also impact production. Crop growth and development would change as would the intensity and frequency of pests and diseases.

Ecosystems/Habitats

Continued global warming would likely shift the ranges of existing invasive plants and weeds, thus altering competition patterns with native plants. Range expansion is expected in many species while range contractions are less likely in rapidly evolving species with significant populations already established. Continued global warming is also likely to increase the populations of and types of pests. Continued global warming would also affect natural ecosystems and biological habitats throughout the state.

Wildland Fires

Global warming is expected to increase the risk of wildfire and alter the distribution and character of natural vegetation. If temperatures rise into the medium warming range, the risk of large wildfires in California could increase by as much as 55 percent, which is almost twice the increase expected if temperatures stay in the lower warming range. However, since wildfire risk is determined by a combination of factors including precipitation, winds, temperature, and landscape and vegetation conditions, future risks would not be uniform throughout the state.

Rising Sea Levels

Rising sea levels, more intense coastal storms, and warmer water temperatures would increasingly threaten the state's coastal regions. Under the high warming scenario, sea level is anticipated to rise 22 to 35 inches by 2100. A sea level risk of this magnitude would inundate coastal areas with salt water, accelerate coastal erosion, threaten levees and inland water systems, and disrupt wetlands and natural habitats.

Sea levels rose approximately seven inches during the last century and the State of California predicts an additional rise of 10 to 17 inches by 2050 and a rise of 31 to 69 inches by 2100, depending on the future levels of GHG emissions. If this occurs, resultant effects could include increased coastal flooding. Sea level rise adaptation strategies include strategies that involve construction of hard structures as barriers, such as seawalls and levees; soft structure strategies such as wetland enhancement, detention basins, and other natural strategies; accommodation strategies that include grade elevations, elevated structures, and other building design options; and withdrawal strategies that limit development to areas unaffected by sea level rise.

Compliance with IBMC Section 15.50.160, *Flood Hazard Reduction Standards*, would require development within coastal high hazard areas to be elevated above the base flood level and be adequately anchored to resist flotation, collapse, and lateral movement as detailed in the regulatory framework section. The project is not within the coastal high hazard area, and is therefore not subject to the standards.

5.7.2 Regulatory Framework

All levels of government have some responsibility for the protection of air quality, and each level (Federal, State, and regional/local) has specific responsibilities relating to air quality regulation. GHG emissions and the regulation of GHGs is a relatively new component of this air quality regulatory framework.

5.7.2.1 Federal

In 1988, the United Nations and the World Meteorological Organization established the IPCC to assess the scientific, technical, and socioeconomic information relevant to understanding the scientific basis for human-induced climate change, its potential impacts, and options for adaptation and mitigation. The most recent reports of the IPCC have emphasized the scientific consensus that real and measurable changes to the climate are occurring, that they are caused by human activity, and that significant adverse impacts on the environment, the economy, and human health and welfare are unavoidable.

On March 21, 1994, the United States joined a number of countries around the world in signing the United Nations Framework Convention on Climate Change. Under the Convention, governments agreed to gather and share information on GHG emissions, national policies, and best practices; launch national strategies for addressing GHG emissions and adapting to expected impacts, including the provision of financial and technological support to developing countries; and cooperate in preparing for adaptation to the impacts of global climate change. The U.S. Supreme Court rules in *Massachusetts v. Environmental Protection Agency*, 549 U.S. 497 (2007), that EPA has the ability to regulate GHG emissions. In addition to the national and international efforts described above, many local jurisdictions have adopted climate change policies and programs.

On December 7, 2009, the EPA Administrator signed two distinct findings regarding GHGs under Section 202(a) of the Federal CAA:

Endangerment Finding: EPA found that the current and projected concentrations of the six key well-mixed GHGs (CO₂, CH₄, N₂O, HFCs, PFCs, and SF₆) in the atmosphere threaten the public health and welfare of current and future generations.

Cause or Contribute Finding: EPA found that the combined emissions of these well-mixed GHGs from new motor vehicles and new motor vehicle engines contribute to the GHG pollution which threatens public health and welfare.

These findings do not themselves impose any requirements on industry or other entities. However, this action was a prerequisite to finalizing the EPA's proposed greenhouse gas emission standards for light-duty vehicles, which were jointly proposed by EPA and the Department of Transportation's National Highway Safety Administration (NHTSA) in two phases: Phase 1 – Model Years 2012-2016 and Phase 2 – Model Years 2017 – 2025. The proposed standards for Model Years 2017-2025 are projected to achieve 163 grams/mile of CO₂ in Model Year 2025 on an average industry fleet-wide basis, which is equivalent to 54.5 miles per gallon if this level were achieved solely through fuel efficiency. The final rule was adopted in 2012 for Model Years 2017–2021, and NHTSA intends to set standards for Model Years 2022–2025 in a future rulemaking. In addition to these regulations applicable to cars and light-duty trucks, in 2011, EPA and NHTSA announced fuel economy and GHG standards for medium- and heavy-duty trucks for Model Years 2014–2018. The standards for CO₂ emissions and fuel consumption are tailored to three main vehicle categories: combination tractors, heavy-duty pickup trucks and vans, and vocational vehicles. According to the EPA, this regulatory program would reduce GHG emissions and fuel consumption for the affected vehicles by six percent to 23 percent over the 2010 baselines.

In August 2016, EPA and NHTSA announced the adoption of the phase two program related to the fuel economy and GHG standards for medium- and heavy-duty trucks. The phase two program would apply to Model Years 2018–2027 vehicles for certain trailers, and Model Years 2021–2027 for semitrucks, large pickup trucks, vans, and all types and sizes of buses and work trucks. The final standards are expected to lower CO₂ emissions by approximately 1.1 billion MT and reduce oil consumption by up to two billion barrels over the lifetime of the vehicles sold under the program

Mandatory GHG Reporting Rule

On March 10, 2009, in response to the fiscal year (FY) 2008 Consolidated Appropriations Act (House Resolution (H.R.) 2764; Public Law 110–161), the EPA proposed a rule that requires mandatory reporting of GHG emissions from large sources in the United States. On September 22, 2009, the Final Mandatory Reporting of Greenhouse Gases Rule was signed, and was published in the Federal Register on October 30, 2009. The rule became effective on December 29, 2009. The rule would collect accurate and comprehensive emissions data to inform future policy decisions.

The EPA requires suppliers of fossil fuels or industrial greenhouse gases, manufacturers of vehicles and engines, and facilities that emit 25,000 MT or more per year of GHG emissions to submit annual reports to EPA. The gases covered by the proposed rule are CO₂, CH₄, N₂O, HFC, PFC, SF₆, and other fluorinated gases, including nitrogen trifluoride (NF₃) and hydrofluorinated ethers (HFE).

5.7.2.2 State

The following subsections describe regulations and standards that have been adopted by the State of California to address GCC issues.

Assembly Bill 32, the California Global Warming Solutions Act of 2006

The California Global Warming Solutions Act of 2006, widely known as AB 32, requires that CARB develop and enforce regulations for the reporting and verification of statewide GHG emissions. CARB is directed to set a GHG emission limit, based on 1990 levels, to be achieved by 2020. The bill requires CARB to adopt rules and regulations in an open public process to achieve the maximum technologically feasible and cost-effective GHG reductions.

Senate Bill 97

Senate Bill 97, enacted in 2007, amends the CEQA statute to clearly establish that GHG emissions and the effects of GHG emissions are appropriate subjects for CEQA analysis. It directs OPR to develop draft CEQA guidelines “for the mitigation of greenhouse gas emissions or the effects of greenhouse gas emissions” by July 1, 2009, and directs the Resources Agency to certify and adopt the CEQA guidelines by January 1, 2010.

Executive Order S-3-05

On June 1, 2005, EO S-3-05 proclaimed that California is vulnerable to climate change impacts. It declared that increased temperatures could reduce snowpack in the Sierra Nevada, further exacerbate California’s air quality problems, and potentially cause a rise in sea levels. In an effort to avoid or reduce climate change impacts, Executive Order S-3-05, signed by Governor Schwarzenegger on June 1, 2005, calls for a reduction in GHG emissions to 1990 levels by 2020 and for an 80 percent reduction in GHG emissions by 2050. Executive Order S-3-05 also calls for the CalEPA to prepare biennial science reports on the potential impact of continued GCC on certain sectors of the California economy. The first of these reports, *Our Changing Climate: Assessing Risks to California*, and its supporting document *Scenarios of Climate Change in California: An Overview* were published by the California Climate Change Center in 2006.

Executive Order B-30-15

On April 29, 2015, executive Order B-30-15 established an interim GH emission reduction goal for the State of California to reduce GHG emissions to 40 percent below 1990 levels by the Year 2030. This Executive Order directs all state agencies with jurisdiction over GHG-emitting sources to implement measures designed to achieve the new interim 2030 goal, as well as the pre-existing,

long-term 2050 goal identified in Executive Order S-3-05 to reduce GHG emissions to 80 percent below 1990 levels by the Year 2050. The Executive Order directs ARB to update its Scoping Plan to address the 2030 goal. It is anticipated that ARB would develop statewide inventory projection data for 2030 and commence efforts to identify reduction strategies capable of securing emission reductions that allow for achievement of the new interim goal for 2030.

Executive Order S-21-09

Executive Order S-21-09 was enacted by Governor Schwarzenegger on September 15, 2009. Executive Order S-21-09 requires that the CARB, under its AB 32 authority, adopt a regulation by July 31, 2010, that sets a 33-percent renewable energy target as established in Executive Order S-14-08. Under Executive Order S-21-09, the CARB would work with the Public Utilities Commission and California Energy Commission to encourage the creation and use of renewable energy sources, and would regulate all California utilities. The CARB would also consult with the Independent System Operator and other load balancing authorities on the impacts on reliability, renewable integration requirements, and interactions with wholesale power markets in carrying out the provisions of the Executive Order. The order requires the CARB to establish highest priority for those resources that provide the greatest environmental benefits with the least environmental costs and impacts on public health.

CARB's Scoping Plan

On December 11, 2008, CARB adopted the Scoping Plan (CARB 2008) as directed by AB 32. The Scoping Plan proposes a set of actions designed to reduce overall GHG emissions in California to the levels required by AB 32. Measures applicable to development projects include those related to energy-efficiency building and appliance standards, the use of renewable sources for electricity generation, regional transportation targets, and green building strategy. Relative to transportation, the Scoping Plan includes nine measures or recommended actions related to reducing vehicle miles traveled and vehicle GHGs through fuel and efficiency measures. These measures would be implemented statewide rather than on a project-by-project basis.

In response to EO B-30-15 and SB 32, all state agencies with jurisdiction over sources of GHG emissions were directed to implement measures to achieve reductions of GHG emissions to meet the 2030 and 2050 targets. CARB was directed to update the Scoping Plan to reflect the 2030 target and is moving forward with the update process. The mid-term target is critical to help frame the suite of policy measures, regulations, planning efforts, and investments in clean technologies and infrastructure needed to continue driving down emissions. CARB has released a second update to the Scoping Plan to reflect the 2030 target set by EO B-30-15 and codified by SB 32. The 2017 Climate Change Scoping Plan Update, Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target, was adopted December 2017.

California Code of Regulations Title 24

Although not originally intended to reduce greenhouse gas emissions, California Code of Regulations Title 24 Part 6: California's Energy Efficiency Standards for Residential and

Nonresidential Buildings were first established in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods. The GHG emission inventory was based on Title 24 standards as of October 2005; however, Title 24 has been updated as of 2008 and standards are set to be phased in beginning in January 2010. The new Title 24 standards are anticipated to increase energy efficiency by 15 percent, thereby reducing GHG emissions from energy use by 15 percent. Energy efficient buildings require less electricity, natural gas, and other fuels. Electricity production from fossil fuels and on-site fuel combustion (typically for water heating) results in greenhouse gas emissions. Therefore, increased energy efficiency results in decreased greenhouse gas emissions.

Senate Bill 1078, Senate Bill 107, and Executive Order S-14-08

SB 1078 initially set a target of 20 percent of energy to be sold from renewable sources by the Year 2017. The schedule for implementation of the RPS was accelerated in 2006 with the Governor's signing of SB 107, which accelerated the 20 percent RPS goal from 2017 to 2010. On November 17, 2008, the Governor signed Executive Order S-14-08, which requires all retail sellers of electricity to serve 33 percent of their load with renewable energy by 2020. The Governor signed Executive Order S-21-09 on September 15, 2009, which directed ARB to implement a regulation consistent with the 2020 33 percent renewable energy target by July 31, 2010. The 33 percent RPS was adopted in 2010.

State Standards Addressing Vehicular Emissions

California Assembly Bill 1493 (Pavley) enacted on July 22, 2002, required the ARB to develop and adopt regulations that reduce greenhouse gases emitted by passenger vehicles and light duty trucks. Regulations adopted by ARB would apply to 2009 and later model year vehicles. ARB estimated that the regulation would reduce climate change emissions from light duty passenger vehicle fleet by an estimated 18 percent in 2020 and by 27 percent in 2030. Once implemented, emissions from new light duty vehicles are expected to be reduced in San Diego County by up to 21 percent by 2020.

The ARB has adopted amendments to the Pavley regulations that reduce GHG emissions in new passenger vehicles from 2009 through 2016. The amendments, approved by the ARB Board on September 24, 2009, are part of California's commitment toward a nation-wide program to reduce new passenger vehicle GHGs from 2012 through 2016, and prepare California to harmonize its rules with the Federal rules for passenger vehicles.

Executive Order S-01-07

Executive Order S-01-07 was enacted by the Governor on January 18, 2007, and mandates that: 1) a statewide goal be established to reduce the carbon intensity of California's transportation fuels by at least ten percent by 2020; and 2) a low carbon fuel standard (LCFS) for transportation fuels be established for California. According to the San Diego County Greenhouse Gas Inventory (SDCGHGI),

the effects of the LCFS would be a ten percent reduction in GHG emissions from fuel use by 2020. On April 23, 2009, the ARB adopted regulations to implement the LCFS.

Senate Bill 375

SB 375 finds that GHG from autos and light trucks can be substantially reduced by new vehicle technology, but even so it would be necessary to achieve significant additional greenhouse gas reductions from changed land use patterns and improved transportation. Without improved land use and transportation policy, California would not be able to achieve the goals of AB 32. Therefore, SB 375 requires that regions with metropolitan planning organizations adopt sustainable communities strategies, as part of their regional transportation plans, which are designed to achieve certain goals for the reduction of GHG emissions from mobile sources.

SB 375 also includes CEQA streamlining provisions for "transit priority projects" that are consistent with an adopted sustainable communities strategy. As defined in SB 375, a "transit priority project" shall: (1) contain at least 50 percent residential use, based on total building square footage and, if the project contains between 26 and 50 percent nonresidential uses, a floor area ratio of not less than 0.75; (2) provide a maximum net density of at least 20 dwelling units per acre; and (3) be within 0.5 mile of a major transit stop or high quality transit corridor.

5.7.2.3 Local

2050 Regional Transportation Plan

The SANDAG Board of Directors adopted the Regional Plan of record and associated EIR on October 5, 2015. The current Regional Plan, San Diego Forward, consists of an RTP and, as required by SB 375, an SCS that demonstrates how the region would achieve GHG emission reduction targets for passenger vehicles set by CARB. Since SANDAG is required by law to update its RTP every four years, the 2019 Regional Plan represents the next iteration of SANDAG's blueprint of future transportation investments and forecasted regional growth and land use change across the County through 2050.

City of San Diego Climate Action Plan

In December 2015, the City of San Diego adopted its CAP. The CAP establishes a baseline for 2010, sets goals for GHG reductions for the milestone years 2020 and 2035, and details the implementation actions and phasing for achieving the goals. To implement the State's goals of reducing emissions to 15 percent below 2010 levels by 2020, and 49 percent below 2010 levels by 2035, the City would be required to implement strategies that would reduce emissions to approximately 10.6 MMT CO₂e by 2020 and to 6.4 MMT CO₂e by 2035. The CAP determined that, with implementation of the measures identified therein, the City would exceed the State's targets for 2020 and 2035. The CAP also identifies a comprehensive set of goals, policies, and actions that the City can use to reduce GHG emissions. The CAP includes five strategies: (1) water- and energy-efficient buildings; (2) clean and renewable energy; (3) bicycling, walking, transit, and land use; (4)

zero-waste; and (5) climate resiliency. The City is working on a new CAP. The draft of CAP is currently out for public review.

City of San Diego Climate Action Plan Consistency Checklist

To provide a mechanism for CEQA tiering, the City developed a CAP Consistency Checklist to provide a streamlined review process for GHG emissions for development subject to CEQA. The checklist contains measures that are required to be implemented on a project-by-project basis to ensure that the specified emissions targets identified in the CAP are achieved. Implementation of the measures identified in the checklist would ensure that new development is consistent with the CAP's assumptions for relevant CAP strategies toward achieving identified GHG reduction targets.

City of San Diego General Plan

The City's General Plan includes various goals and policies designed to help result in a reduction in GHG emissions. Climate change and GHG reduction policies are addressed in multiple chapters of the General Plan. The goal and policies related to GHG emissions relevant to the project are as follows:

Goal: To reduce the City's overall carbon dioxide footprint by improving energy efficiency, increasing use of alternative modes of transportation, employing sustainable planning and design techniques, and providing environmentally-sound waste management.

Policy CE-A.5 Employ sustainable or "green" building techniques for the construction and operation of buildings.

(a) Develop and implement sustainable building standards for new and significant remodels of residential and commercial buildings to maximize energy efficiency, and to achieve overall net zero energy consumption by 2020 for new residential buildings and 2030 for new commercial buildings. This can be accomplished through factors including, but not limited to:

- Designing mechanical and electrical systems that achieve greater energy efficiency with currently available technology;*
- Minimizing energy use through innovative site design and building orientation that addresses factors such as sun-shade patterns, prevailing winds, landscape, and sun-screens;*
- Employing self-generation of energy using renewable technologies;*
- Combining energy efficient measures that have longer payback periods with measures that have shorter payback periods;*
- Reducing levels of non-essential lighting, heating and cooling; and*
- Using energy efficient appliances and lighting.*

Policy CE-A-7 Construct and operate buildings using materials, methods, and mechanical and electrical systems that ensure a healthful indoor air quality. Avoid contamination by carcinogens, volatile organic compounds, fungi, molds, bacteria, and other known toxins.

- (a) Eliminate the use of chlorofluorocarbon-based refrigerants in newly constructed facilities and major building renovations and retrofits for all heating, ventilation, air conditioning, and refrigerant-based building systems.*
- (b) Reduce the quantity of indoor air contaminants that are odorous or potentially irritating to protect installers and occupants' health and comfort. Where feasible, select low-emitting adhesives, paints, coatings, carpet systems, composite wood, agrifiber products, and others.*

Policy CE-A.8 Reduce construction and demolition waste in accordance with Public Facilities Element, Policy PF-I.2, or be renovating or adding on to existing buildings, rather than constructing new buildings.

Policy CE-A.9 Reuse building materials, use materials that have recycled content, or use materials that are derived from sustainable or rapidly renewable sources to the extent possible, through factors including:

- Scheduling time for deconstruction and recycling activities to take place during project demolition and construction phases;*

Policy CE-A.10 Include features in buildings to facilitate recycling of waste generated by building occupants and associated refuse storage areas.

- a. Provide permanent, adequate, and convenient space for individual building occupants to collect refuse and recyclable material.*
- b. Provide a recyclables collection area that serves the entire building or project. The space should allow for the separation, collection and storage of paper, glass, plastic, metals, yard waste, and other materials as needed.*

Policy CE-A.11 Implement sustainable landscape design and maintenance.

- a. Use integrated pest management techniques, where feasible, to delay, reduce, or eliminate dependence on the use of pesticides, herbicides, and synthetic fertilizers.*
- c. Decrease the amount of impervious surfaces in developments, especially where public places, plazas and amenities are proposed to serve as recreation opportunities.*
- d. Strategically plant deciduous shade trees, evergreen trees, and drought tolerant native vegetation, as appropriate, to contribute to sustainable development goals.*
- e. Reduce use of lawn types that require high levels of irrigation.*
- f. Strive to incorporate existing mature trees and native vegetation into site designs.*
- h. Implement water conservation measures in site/building design and landscaping.*
- i. Encourage the use of high efficiency irrigation technology, and recycled site water to reduce the use of potable water for irrigation. Use recycled water to meet the needs of development projects to the maximum extent feasible.*

Policy CE-A.12 Reduce the San Diego Urban Heat Island through actions as:

- *Using cool roofing materials, such as reflective, low heat retention tiles, membranes and coatings, or vegetated eco-roofs to reduce heat build-up;*
- *Planting trees and other vegetation, to provide shade and cool air temperatures. In particular, properly position trees to shade buildings, air conditions units, and parking lots; and*
- *Reducing heat build up in parking lots through increased shading or use of cool paving materials as feasible.*

5.7.3 Impact Analysis

5.7.3.1 Issue 1

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

Impact Threshold

According to the City Thresholds, projects that are consistent with the City's CAP, as determined through the CAP Consistency Checklist, would result in a less-than-significant cumulative impact regarding GHG emissions. If a project is not consistent with the City's CAP, as determined through the CAP Consistency Checklist, potentially significant cumulative GHG impacts would occur. For project-level environmental documents, significance is determined through the CAP Consistency Checklist.

Analysis

An assessment of the project was conducted through completion of the CAP Consistency Checklist. Provided below is a summary of the project's consistency with the CAP Consistency Checklist.

The City's CAP Consistency Checklist focuses on operational emissions associated with planned land uses and includes a three-step process to determine project if a project would result in a greenhouse 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 compliance with the CAP strategies. Step 3 is only applicable if a project is not consistent with the land use and/or zone, but results in a more intensive project in a transit priority area than assumed in the CAP.

Step 1: Land Use Consistency

Step 1 of the CAP Consistency Checklist assesses a project's consistency with the growth projections used in development of the CAP. To evaluate land use consistency under Step 1, a project's consistency with the existing General Plan and Community Plan land use and zoning designations is

evaluated. As described below, the project's proposed land uses and development intensity/density are consistent with the General Plan, the Uptown Community Plan, and existing zoning.

As described in Section 5.1, the project site contains developed and undeveloped portions. The General Plan designates the developed portion of the hospital campus as located in the Multiple Use and Institutional & Public and Semi-Public Facilities land use designated areas; vegetated slopes void of development within the project site are located in the Park, Open Space, & Recreation land use designated area. The project proposes no redevelopment in the Park, Open Space, & Recreation-designated portions of the site. Within the Multiple Use- and Institutional & Public and Semi-Public Facilities-designated portions of the site, development would include hospital buildings, medical office buildings, and support buildings, which is consistent with the General Plan land use designations. As demonstrated in Table 5.1-1, *City of San Diego General Plan Consistency*, the project would be consistent with the applicable goals and policies of the City of San Diego General Plan.

The project site is located within the Uptown Community Plan area. The Community Plan designates the site for Institutional and Community Commercial uses. The developed portion of the hospital campus is located in the Institutional and Community Commercial: 0-109 Du/Ac land use designated areas; vegetated slopes void of development within the project site are located in the Open Space land use designated area. The project proposes no redevelopment in the Open Space-designated portions of the site. Within the Institutional- and Community Commercial-designated portions of the site, development would include hospital buildings, medical office buildings, and support buildings, which is consistent with the Community Plan land use designations. As demonstrated in Table 5.1-2, *Uptown Community Plan Consistency*, the project would be consistent with the applicable goals and policies of the Uptown Community Plan.

The project is zoned CC-3-8 and CC-3-9, both of which allow hospitals with the application of a CUP, as well as the RM-3-9, OC-1-1, and OR-1-1 zones. The project proposes development in the CC-3-8 and CC-3-9 zones and does not propose any new development in the RM-3-9, OC-1-1, and OR-1-1 zones. As such, the project would be consistent with existing zoning designations.

Therefore, Step 1 of the CAP Consistency Checklist is answered in the affirmative under Option A (*Is the proposed project consistent with the existing General Plan and Community Plan land use and zoning designations?*) for the project.

Step 2: CAP Strategies Consistency

After determining consistency with Step 1 of the CAP Consistency Checklist, Step 2 is required to review and evaluate a project's consistency with the applicable strategies and actions of the CAP. The project's conformance with each CAP Consistency Checklist measure is evaluated in Table 5.7-3, *CAP Strategies Consistency*. As summarized in Table 5.7-3, *CAP Strategies Consistency*, the project would be consistent with each CAP Strategy. Therefore, the project would be consistent with all applicable CAP Consistency Checklist measures outlined in Step 2 and would be consistent with the City's CAP with respect to planning and land use strategies. The project would not impede the City's ability to

implement the actions identified in the CAP to achieve the CAP's targets and associated GHG emission reductions. Thus, the project would not result in significant impacts relative to GHG emissions.

Step 3: Project CAP Conformance Evaluation

Step 3 would only apply if Step 1 is answered in the affirmative under Option B (*If the proposed project is not consistent with the existing land use plan and zoning designations, and includes a land use plan and/or zoning designation amendment, would the proposed amendment result in an increased density within a Transit Priority Area (TPA) and implement CAP Strategy 3 actions, as determined in Step 3 to the satisfaction of the Development Services Department?*). As described above, Step 1 has been answered in the affirmative under Option A; therefore, Step 3 is not applicable.

Significance of Impacts

The project would be consistent with the CAP. Therefore, the project would not result in a cumulatively significant generation of GHG emissions. Thus, impacts would be less than significant.

Mitigation Measures

No mitigation would be required.

5.7.3.2 Issue 2

Issue 2 Would the project conflict with the City's Climate Action Plan or any applicable plan, policy, or regulation adopted for the purpose of reducing emissions of greenhouse gases?

Impact Threshold

A project could result in a significant impact on greenhouse gas emissions if it would:

- Conflict with the City's Climate Action Plan or any applicable plan, policy, or regulation adopted for the purpose of reducing emissions of greenhouse gases.

Analysis

As discussed in Issue 1 above, the project was assessed through the CAP Consistency Checklist (Appendix C). Based on the project's consistency with the CAP Consistency Checklist strategies, the project's contribution of GHG emissions to cumulative Statewide emissions would be less than cumulatively considerable. Overall, the project would be consistent with the CAP.

As detailed in Section 5.7.2, numerous plans, policies, and regulations have been developed for the purpose of reducing GHG emissions. The project does not conflict with or inhibit implementation of those plans and regulations.

The City General Plan includes policies to reduce GHG emissions, delineated in Section 5.7.2.3. The project's consistency with these policies is analyzed in Table 5.7-4, *General Plan Conservation Element – Project Consistency*. As shown in Table 5.7-4, the project would be consistent with the City's General Plan policies for reducing GHG emissions.

Significance of Impacts

The project would not conflict with the CAP or any other applicable plan, policy, or regulation adopted for the purpose of reducing emissions of greenhouse gases. Impacts would, therefore, be less than significant.

Mitigation Measures

No mitigation would be required.

Table 5.7-1. Global Warming Potentials and Atmospheric Lifetimes of GHGs

GHG	Formula	100-Year Global Warming Potential	Atmospheric Lifetime (Years)
Carbon Dioxide	CO ₂	1	Variable
Methane	CH ₄	28	12
Nitrous Oxide	N ₂ O	265	121
Sulfur Hexafluoride	SF ₆	23,500	3,200
Hydrofluorocarbons	HFCs	100 to 12,000	1 to 100
Perfluorocarbons	PFCs	7,000 to 11,000	3,000 to 50,000
Nitrogen Trifluoride	NF ₃	16,100	500

Source: First Update to the Climate Change Scoping Plan, ARB 2014

Table 5.7-2. State of California GHG Emissions by Sector

Sector	Total 1990 Emissions (MMTCO ₂ e)	Percent of Total 1990 Emissions	Total 2012 Emissions (MMTCO ₂ e)	Percent of Total 2012 Emissions
Agriculture	23.4	5%	37.86	8%
Commercial	14.4	3%	14.20	3%
Electricity Generation	110.6	26%	95.05	21%
Forestry (excluding sinks)	0.2	<1%	Not reported	--
Industrial	103.0	24%	89.16	19%
Residential	29.7	7%	28.09	6%
Transportation	150.7	35%	167.38	36%
Recycling and Waste	Not reported	--	8.49	2%
High GWP Gases	Not reported	--	18.41	4%
Forestry Sinks	(6.7)	--	Not reported	--

Table 5.7-3. CAP Strategies Consistency

Strategy	Project Consistency
<p>1. Cool/Green Roofs.</p> <ul style="list-style-type: none"> • <i>Would the project include roofing materials with a minimum 3-year aged solar reflection and thermal emittance or solar reflection index equal to or greater than the values specified in the voluntary measures under California Green Building Standards Code; OR</i> • <i>Would the project roof construction have a thermal mass over the roof membrane, including areas of vegetated (green) roofs, weighing at least 25 pounds per square foot as specified in the voluntary measures under California Green Building Standards Code? OR</i> • <i>Would the project include a combination of the above two options?</i> 	<p>Consistent – Development of the project would include roofing materials meeting the performance standard of a minimum three-year aged solar reflection and thermal emittance or solar reflection index equal to or greater than the values specified in the measures under California Green Building Standards Code; or would include roof construction that meets the performance standard of a thermal mass over the roof membrane, including areas of vegetated (green) roofs, weighing at least 25 pounds per square foot as specified in the voluntary measures under California Green Building Standards Code; or would provide a combination of these two design features.</p>
<p>2. Plumbing fixtures and fittings</p> <p><i>With respect to plumbing fixtures or fittings provided as part of the project, would those low-flow fixtures/appliances be consistent with each of the following:</i></p> <p><i>Residential buildings:</i></p> <ul style="list-style-type: none"> • <i>Kitchen faucets: maximum flow rate not to exceed 1.5 gallons per minute at 60 psi;</i> • <i>Standard dishwasher: 4.25 gallons per cycle;</i> • <i>Compact dishwashers: 3.5 gallons per cycle; and</i> • <i>Clothes washers: water factor of 6 gallons per cubic feet of drum capacity?</i> <p><i>Nonresidential buildings:</i></p> <ul style="list-style-type: none"> • <i>Plumbing fixtures and fittings that do not exceed the maximum flow rate specified in Table A5.303.2.3.1 (voluntary measures) of the California Green Building Standards Code; and</i> • <i>Appliances and fixtures for commercial applications that meet the provisions of Section A5.303.3 (voluntary measures) of the California Green Building Standards Code?</i> 	<p>Consistent – As hospital requirements are different, the project would not be consistent with the standards outlined in Table A5.303.2.3.1 (voluntary measures) and Section A5.303.3 (voluntary measures) of the California Green Building Standards Code. However, the project would be in compliance with Appendix A6.1 of the California Green Building Standards Code – Voluntary Standards for Health Facilities (OSHDP 1, 2, & 4).</p>
<p>3. Electric Vehicle Charging</p> <ul style="list-style-type: none"> • <i>Multiple-family projects of 17 dwelling units or less: Would 3% of the total parking spaces required, or a minimum of one space, whichever is greater, be provided with a listed cabinet, box or enclosure connected to a conduit linking the parking spaces with the electrical service, in a manner approved by the</i> 	<p>Consistent – The project proposes 2,200 parking spaces, 545 spaces more than the required number of spaces. A total of 162 spaces, or six percent of the total parking spaces required, would be provided with a listed cabinet, box, or enclosure connected to a conduit with the electrical service. More than 41 spaces, or 50 percent of the required listed spaces with cabinets, boxes, or enclosures are required to have the necessary electric vehicle supply equipment</p>

Strategy	Project Consistency																		
<p><i>building and safety official, to allow for the future installation of electric vehicle supply equipment to provide electric vehicle charging stations at such time as it is needed for use by residents?</i></p> <ul style="list-style-type: none"> • <u>Multiple-family projects of more than 17 dwelling units:</u> <i>Of the total required listed cabinets, boxes or enclosures, would 50% have the necessary electric vehicle supply equipment installed to provide active electric vehicle charging stations ready for use by residents?</i> • <u>Non-residential projects:</u> <i>Of the total required listed cabinets, boxes or enclosures, would 50% have the necessary electric vehicle supply equipment installed to provide active electric vehicle charging stations ready for use?</i> 	<p>installed to provide active electric vehicle charging stations ready for use. The project would provide EV parking spaces in excess of the minimum requirement of 41 spaces.</p>																		
<p>4. Bicycle Parking Spaces</p> <p><i>Would the project provide more short- and long-term bicycle parking spaces than required in the City's Municipal Code (Chapter 14, Article 2, Division 5)?</i></p>	<p>Consistent – The project requires 58 short-term and 58 long-term bicycle parking spaces, or five percent of the required automobile parking, at project build-out. The project would comply with the code requirements as development of the campus occurs.</p>																		
<p>5. Shower Facilities</p> <p><i>If the project includes nonresidential development that would accommodate over 10 tenant occupants (employees), would the project include changing/shower facilities in accordance with the voluntary measures under the California Green Building Standards Code as shown in the table below?</i></p> <table border="1" data-bbox="212 1312 797 1759"> <thead> <tr> <th style="background-color: #ADD8E6;">Number of Tenant Occupants (Employees)</th> <th style="background-color: #ADD8E6;">Shower/Changing Facilities Required</th> <th style="background-color: #ADD8E6;">Two-Tier (12" X 15" X 72") Personal Effects Lockers Required</th> </tr> </thead> <tbody> <tr> <td>0-10</td> <td>0</td> <td>0</td> </tr> <tr> <td>11-50</td> <td>1 shower stall</td> <td>2</td> </tr> <tr> <td>51-100</td> <td>1 shower stall</td> <td>3</td> </tr> <tr> <td>101-200</td> <td>1 shower stall</td> <td>4</td> </tr> <tr> <td>Over 200</td> <td>1 shower stall plus 1 additional shower stall for each 200 additional tenant-occupants</td> <td>1 two-tier locker plus 1 two-tier locker for each 50 additional tenant-occupants</td> </tr> </tbody> </table>	Number of Tenant Occupants (Employees)	Shower/Changing Facilities Required	Two-Tier (12" X 15" X 72") Personal Effects Lockers Required	0-10	0	0	11-50	1 shower stall	2	51-100	1 shower stall	3	101-200	1 shower stall	4	Over 200	1 shower stall plus 1 additional shower stall for each 200 additional tenant-occupants	1 two-tier locker plus 1 two-tier locker for each 50 additional tenant-occupants	<p>Consistent – The project would include changing/shower facilities in accordance with Table A5.106.4.3. (voluntary measures) of the California Green Building Standards Code. At peak demand, the project would generate 1,193 employees. As such, six showers and 24 lockers would be required. The project would provide 420 lockers and 10 showers; the lockers and showers provided over the minimum required count are due to the additional needs presented by the healthcare setting, such as extended hours of operation, overnight shifts, and frequent shift changes. Detailed locations will be shown on the fixtures/plumbing sheets at the time of building permit submittal for those buildings.</p>
Number of Tenant Occupants (Employees)	Shower/Changing Facilities Required	Two-Tier (12" X 15" X 72") Personal Effects Lockers Required																	
0-10	0	0																	
11-50	1 shower stall	2																	
51-100	1 shower stall	3																	
101-200	1 shower stall	4																	
Over 200	1 shower stall plus 1 additional shower stall for each 200 additional tenant-occupants	1 two-tier locker plus 1 two-tier locker for each 50 additional tenant-occupants																	
<p>6. Designated Parking Spaces</p> <p><i>If the project includes a nonresidential use in a TPA, would the project provide designated parking for a</i></p>	<p>Consistent – The project is located within a TPA. Because the project proposes non-residential uses, it would be required to provide designated parking for a combination of low-emitting, fuel-efficient, and</p>																		

Strategy	Project Consistency																		
<p><i>combination of low-emitting, fuel-efficient, and carpool/vanpool in accordance with the following table?</i></p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th style="background-color: #ADD8E6;">Number of Required Parking Spaces</th> <th style="background-color: #ADD8E6;">Number of Designated Parking Spaces</th> </tr> </thead> <tbody> <tr><td>0-9</td><td>0</td></tr> <tr><td>10-25</td><td>2</td></tr> <tr><td>26-50</td><td>4</td></tr> <tr><td>51-75</td><td>6</td></tr> <tr><td>76-100</td><td>9</td></tr> <tr><td>101-150</td><td>11</td></tr> <tr><td>151-200</td><td>18</td></tr> <tr><td>201 and over</td><td>At least 10% of total</td></tr> </tbody> </table>	Number of Required Parking Spaces	Number of Designated Parking Spaces	0-9	0	10-25	2	26-50	4	51-75	6	76-100	9	101-150	11	151-200	18	201 and over	At least 10% of total	<p>carpool/vanpool vehicles in accordance with the table in this section of the CAP Consistency Checklist. The project would comply with this requirement.</p>
Number of Required Parking Spaces	Number of Designated Parking Spaces																		
0-9	0																		
10-25	2																		
26-50	4																		
51-75	6																		
76-100	9																		
101-150	11																		
151-200	18																		
201 and over	At least 10% of total																		
<p>7. Transportation Demand Management Program</p> <p><i>If the project would accommodate over 50 tenant-occupants (employees), would it include a transportation demand management program that would be applicable to existing tenants and future tenants that includes:</i></p> <p><i>At least one of the following components:</i></p> <ul style="list-style-type: none"> • <i>Parking cash out program</i> • <i>Parking management plan that includes charging employees market-rate for single-occupancy vehicle parking and providing reserved, discounted, or free spaces for registered carpools or vanpools</i> • <i>Unbundled parking whereby parking spaces would be leased or sold separately from the rental or purchase fees from the development for the life of the development</i> <p><i>And at least three of the following components:</i></p> <ul style="list-style-type: none"> • <i>Commitment to maintaining an employer network in the SANDAG iCommute program and promoting its RideMatcher service to tenants/employees</i> • <i>On-site carsharing vehicle(s) or bikesharing</i> • <i>Flexible or alternative work hours</i> • <i>Telework program</i> • <i>Transit, carpool, and vanpool subsidies</i> • <i>Pre-tax deduction for transit or vanpool fares and bicycle commute costs</i> • <i>Access to services that reduce the need to drive, such as cafes, commercial stores, banks, post offices, restaurants, gyms, or childcare, either</i> 	<p>Consistent – The project involves redevelopment of the Scripps Mercy Hospital Campus and includes a new hospital as well as new medical office facilities. The project would implement a Transportation Demand Management Program that would include:</p> <ul style="list-style-type: none"> • Offering a carpool program to employees and preferred parking spaces (designated) for employees that self-select to carpool with other employees. • Maintaining an employer network in the SANDAG iCommute program and promoting its RideMatcher service to its employees. • Scripps Health’s current Transportation Discount Benefit program provides a 30 percent discount (which is approximately \$1.00 per day per employee for the current monthly pass of \$72.00) for employees using public transportation, such as the bus, trolley or Coaster trains, and a \$30.00 per month discount for employees using van pools. The program benefits both employees and the environment by contributing to a work-life balance, as well as reducing greenhouse gas emissions. Participants can save even more money by purchasing transit passes or paying for monthly van pool lease costs on a pre-tax basis. • Offering flexible and alternative work hours. • Offering virtual doctor and urgent care visits, which allow doctors to work remotely and patients not needing to drive to appointments. 																		

Strategy	Project Consistency
<p><i>onsite or within 1,320 feet (1/4) mile of the structure/use?</i></p>	<ul style="list-style-type: none"> • Offering employees of Scripps Health “work at home” options via Telecommuting, Telemedicine, Clinical Documentation Integrity Specialist (CDIS), or other approved programs shifting up to five percent of the workforce to working remotely for one or more days per week. • Access to services that reduce the need to drive, such as cafes, commercial stores, banks, post offices, restaurants, gyms, and childcare, within 1,320 feet (1/4 mile) of the hospital campus. • Upgrade the existing bus stop on Washington Street and Fifth Avenue (Stop ID 11243) to add a shelter and maps/wayfinding signs.

5.8 Public Services and Facilities

Public services are those functions that serve a community's needs and include police protection, fire-rescue, libraries, parks and recreation, and schools. The following provides a discussion of police and fire-rescue services and facilities as they relate to the project. The project proposes construction of institutional buildings on the Scripps Mercy Hospital Campus and would not generate any new residents or population; therefore, the project would not contribute to the demand for libraries, parks and recreation, or school services, which are typically resident-focused. The topics of libraries, parks and recreation, and school services are addressed in Chapter 7.0, *Effects Found Not to Be Significant*, of this EIR.

5.8.1 Existing Conditions

The following section contains a description of the existing public services and facilities that would serve the project area. Figure 5.12-1, *Location of Public Services*, shows the location of existing public services and facilities that would serve the project.

5.8.1.1 Police Protection

Police protection for the Scripps Mercy Hospital Campus area is provided by the San Diego Police Department (SDPD). The SDPD is divided into nine divisions. The Scripps Mercy Hospital Campus is located in the Hillcrest neighborhood and is served by the Western Division's Beat 627. The Western Division police station is located at 5215 Gaines Street, approximately 3.5 miles west of the Scripps Mercy Hospital Campus. The Western Division serves a population of 129,709 people and encompasses 22.7 square miles. The divisions serves the neighborhoods of Hillcrest, La Playa, Linda Vista, Loma Portal, Midtown, Midway District, Mission Hills, Mission Valley West, Morena Beach, Old Town, Point Loma Heights, Roseville-Fletridge, Sunset Cliffs, University Heights, and Wooded Area.

The SDPD currently utilizes a five-level priority call dispatch system, which includes priority zero (Emergency), one, two, three, and four. The calls are prioritized by the phone dispatcher and routed to the radio operator for dispatch to the field units. The priority system is designed as a guide, allowing the phone dispatcher and the radio dispatcher discretion to raise or lower the call priority as necessary based on the information received. The SDPD sets response time goals for the different levels of emergencies. Average response time guidelines are as follows: Priority zero calls (imminent threat to life) within seven minutes; Priority one calls (serious crimes in progress) within 14 minutes; Priority two calls (less serious crimes with no threat to life) within 27 minutes; Priority three calls (minor crimes/requests that are not urgent) within 80 minutes; Priority four calls (minor requests for police service) within 90 minutes. The SDPD's general goal for responding to emergency calls is seven minutes and the staffing goal is to maintain 1.48 officers per 1,000 population ratio. The SDPD is meeting or exceeding these response times for Fiscal Year 2021 for priority zero and four calls.

5.8.1.2 Fire/Life Safety Protection

Fire protection and emergency services are provided by the San Diego Fire-Rescue Department (SDFD), which serves a total area of approximately 343 square miles, a population of over 1.4 million, and 17 miles of coastline extending three miles offshore. If additional support is needed, SDFD relies on automatic aid agreements with jurisdictions adjacent to the City. These agreements ensure that the closest engine company or medic unit is available to respond to an incident, regardless of jurisdiction.

SDFD is a multi-faceted organization that provides the City with fire and life-saving services including fire protection, emergency medical services, and lifeguard protection at San Diego beaches, as well as safety education to ensure the protection of life, property and the environment, including education about vegetation management to protect properties from wildfires in canyon areas.

SDFD has 52 fire stations. The Uptown Community is served primarily by three fire stations: Station 5, Station 8, and Station 3. The project site is served by Station 5 is located at 3902 Ninth Avenue, approximately 0.6 mile southeast of the project site. This station's district service area is 4.1 square miles, serving the Hillcrest Community and its surrounding areas. Station 5 operates one fire engine and one Battalion Chief's vehicle. Station 5 completed a remodel in August 2018, and now includes over 10,000 feet and two stories.

The City of San Diego has established a first responder arrival on emergencies response time of 6.5 minutes, 90 percent of the time from the assignment of the responder by dispatch to arrival on scene of emergency. Based on data collected by the City, for Fiscal Year 2020, this goal was met 79 percent of the time; and in Fiscal Year 2021, 76 percent of the time.

Emergency medical services are provided to the project site and throughout the city through a public/private partnership between the City's EMS Falck USA, which provides additional personnel and some ambulances. EMS has ambulances, paramedics, and emergency medical technicians (EMTs) who respond to emergency calls. Calls are prioritized from Level 1 (most serious) to Level 4 (non-emergency).

Fire Hazard Severity Zones

Responsibility for wildland fire protection in California is divided between the State, local government, and the Federal government. The California Department of Forestry and Fire Protection (CAL FIRE) adopted Fire Hazard Severity Zone maps for State Responsibility Areas in 2007, as well as recommended maps for Very High Fire Hazard Severity Zones in Local Responsibility Areas. Local Responsibility Areas include incorporated cities, cultivated agriculture lands, and portions of the desert. The CAL FIRE recommendations are not the same as actual zones, which do not go into effect unless adopted by local agencies (CAL FIRE 2012). In San Diego County, CAL FIRE has made recommendations on 13 cities, including the City of San Diego. The County of San Diego Wildland Hazard Map tool provides local designations based on CAL FIRE's recommendations (SDFD 2009).

Fire Hazard Severity Zones are based on increasing fire hazard and are designated as “No Designation,” “Moderate,” “High,” or “Very High.”

The *Very High Fire Hazard Severity Zone (VHFHSZ) Map*, as shown on Figure 5.12-2, was established on February 24, 2009, in coordination between the City of San Diego Fire Department and CAL-FIRE. The VHFHSZ map identifies areas within and adjacent to the project site that would fall into a risk zone. However, the project site is mostly surrounded by urban development. The remaining area of vegetated fuel load is located along the northeast corner and eastern boundary of the project site. Safety issues relative to the risk of wildfire are addressed in Chapter 7.0, *Effects Not Found to Be Significant*, of the EIR.

5.8.2 Regulatory Framework

5.8.2.1 State

State Fire Regulations

State fire regulations are set forth in Sections 13000 et seq. of the California Health and Safety Code, which include regulations concerning building standards (as also set forth in the California Building Code [CBC]), fire protection and notification systems, fire protection devices such as extinguishers and smoke alarms, high-rise building and childcare facility standards, and fire suppression training. The State Fire Marshal enforces these regulations and building standards in all state-owned building, state-occupied buildings, and State institutions throughout California.

California Mutual Aid Plan

The California Mutual Aid Plan establishes policies, procedures, and responsibilities for requesting and providing inter- and intra-agency assistance in emergencies. The plan directs local agencies to develop automatic or mutual aid agreements, or to enter into agreements for assistance by hire where local needs are not met by the framework established by the Mutual Aid Plan.

5.8.2.2 Local

City of San Diego General Plan

The City's General Plan contains a Public Facilities, Services, and Safety Element (2021) to address publicly managed and provided facilities and services. This element provides policies for financing, prioritization, developer, and City funding responsibilities for public facilities in the City.

Fire Services Deployment

Fire response deployment is about the speed and weight of attack. Speed calls for first-due, all-risk intervention units (engines, trucks, and/or rescue ambulances) strategically located across a community responding in an effective travel time. These units are tasked with controlling moderate emergencies without the incident escalating to second alarm or greater size, which unnecessarily

depletes departmental resources as multiple requests for service occur. Weight is about multiple-unit response for serious emergencies such as a room and contents structure fire, a multiple-patient incident, a vehicle accident with extrication required, or a heavy rescued incident. In these situations, enough firefighters must be assembled within a reasonable timeframe to safely control the emergency, thereby keeping it from escalating to greater alarms. The science of fire crew deployment is to spread crews out across a community for quick response to keep emergencies small with positive outcomes, without spreading the crews so far apart that they cannot amass together quickly enough to be effective in major emergencies (Citygate 2017).

Distribution of Fire Stations

To treat medical patients and control small fires, the first responding unit should arrive within seven minutes and 30 seconds from the time of the 9-1-1 call receipt in fire dispatch. This equates to a one-minute dispatch time, one minute and 30 seconds for company turnout time, and a five-minute drive time in the most populated areas (City of San Diego General Plan, Policy PF-D.1, 2021).

Multiple-Unit Effective Response Force for Serious Emergencies

To confine fires near the room of origin, to confine wildland fires to fewer than three acres when noticed promptly, or to treat up to five medical patients at once, the goal is for a multiple-unit response of at least 17 personnel to arrive within 10 minutes and 30 seconds from the time of the 9-1-1 call receipt in fire dispatch, 90 percent of the time. This equates to a one-minute dispatch time, a one minute and 30 seconds company turnout time, and an eight-minute drive time spacing for multiple units in the most populated areas (City of San Diego General Plan, Policy PF-D.1 2021).

Adopted Fire Station Location Measures

To direct fire station location timing and crew size planning as the community grows, the adopted fire unit deployment performance measures are based on population density zones listed in the Public Facilities, Services and Safety Element (updated 2021) Table PF-D.2 of the General Plan. Structure fires in urban areas over 1,000 people per square mile would require a response standard of five minutes for first due travel time, 7.5 minutes for total reflex time, eight minutes for first alarm travel time, and 10.5 minutes for first alarm total reflex. Reflex time is the total time from receipt of a 9-1-1 call to arrival of the required number of emergency units (Citygate 2017).

Aggregate Population Definitions

Standards listed in Table PF-D.2 of the General Plan guide the determination of response time measures and the need for fire stations. The first-due unit travel time goal for metropolitan areas of over 200,000 people is four minutes. Urban-suburban areas of less than 200,000 people would require a goal of five minutes (City of San Diego General Plan, 2021).

5.8.3 Impact Analysis

5.8.3.1 Issue 1

Issue 1: Would the project have an effect upon, or result in a need for new or altered governmental services in any of the following areas: Police protection; Fire/Life Safety protection; Libraries; Parks or other recreational facilities; maintenance of public facilities, including roads; and Schools?

Impact Threshold

Per the City Thresholds, impacts to public services and facilities would be significant if a project would conflict with the community plan in terms of the number, size, and location of public service facilities and if so, would it result in the need for new or expanded public service facilities, the construction of which would cause direct, adverse physical environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives.

Analysis

The project would be consistent with the relevant goals and policies of the City of San Diego General Plan and Uptown Community Plan. The analysis presented in this section is intended to evaluate those public services and facilities needed to specifically serve the project.

The project proposes construction of institutional buildings on the Scripps Mercy Hospital Campus and would not generate any new residents or population; therefore, the project would not contribute to the demand for libraries, parks and recreation, or school services, which are typically resident-focused. The topics of libraries, parks and recreation, and school services are addressed in Chapter 7.0, *Effects Found Not to Be Significant*, of this EIR.

Police

The project site is served by the Western Division of the SDPD. The project would not introduce any new residents at the project site but would introduce new employees, patients, and visitors. The increase would not be substantial enough to affect SDPD response times. The SDPD has facilities and staffing in the project area to adequately serve the project. The project reduces its demand on police services consistent with the City's Crime Prevention Through Environmental Design concepts and measures for land development. For example, the project's design incorporates clear boundaries between private spaces and semi-public areas. Additionally, building design would include windows, entrances, and other features that activate the ground plane and/or allow for "eyes on the street" security. All exterior areas that people would use during the evening/nighttime hours would be well-lit and visually accessible, and security would be provided as necessary. Ongoing funding for police services is provided by the City General Fund; and no new facilities or improvements to existing facilities would be required.

The project would be subject to applicable Development Impact Fees for public facilities financing in accordance with Municipal Code Section 142.0640, including fees for police facilities funding. Project impacts to police protection services would be less than significant.

Fire-Rescue

In 2017, Citygate Associates, LLC published the *Standards of Response Coverage Review for the City of San Diego Fire-Rescue Department*. The 2017 Citygate report identifies the need for 10 new fire stations throughout the City to close current service gaps and improve response times. The 2017 Citygate Report does not specifically identify the Uptown Community as a priority area for new fire stations. However, a new replacement facility at Fire Station 5, located approximately 0.6-mile from the Scripps Mercy Hospital Campus, was completed in August 2018 to meet the needs of the local neighborhood, including the Scripps Mercy Hospital Campus. In addition, Fire Station 8, located approximately 0.8-mile from the Scripps Mercy Hospital Campus, is also planned for relocation/expansion to better meet the needs of the community. Beyond these two fire station expansions, there is no evidence that other fire protection facilities would be needed in the Uptown neighborhood. Moreover, the Uptown Community Plan EIR does not identify a need for additional fire stations in the Uptown Community.

The project site is served by existing Fire Stations 3, 5, and 8. Based on the Uptown Community Plan, these three fire stations are projected to be able to serve approximately 58,870 persons living in the Uptown Community at full buildout. The project would not introduce any new residents but would introduce new employees, patients, and visitors at the project site. The project would be constructed in accordance with applicable fire codes and would comply with applicable City regulations. The project would provide fire safety features; all new development would include state-of-the-art emergency fire alarm and fire sprinkler systems. The project would not conflict with the Uptown Community Plan in terms of number, size, and location of existing or planned Fire-Rescue facilities. The Fire-Rescue Department has facilities and staffing in the project area to adequately serve the project and the project would not affect response times of the SDFD.

The project would be subject to applicable Development Impact Fees for public facilities financing in accordance with Municipal Code Section 142.0640, including fees for police facilities funding. No new or expanded facilities or improvements to existing facilities would be required as a result of the project. Therefore, no new or expanded facilities would be required as a result of the project and impacts to Fire Protection would not be significant.

Significance of Impacts

The project would not result in significant impacts to police protection or fire/life safety protection.

Mitigation Measures

Mitigation would not be required.

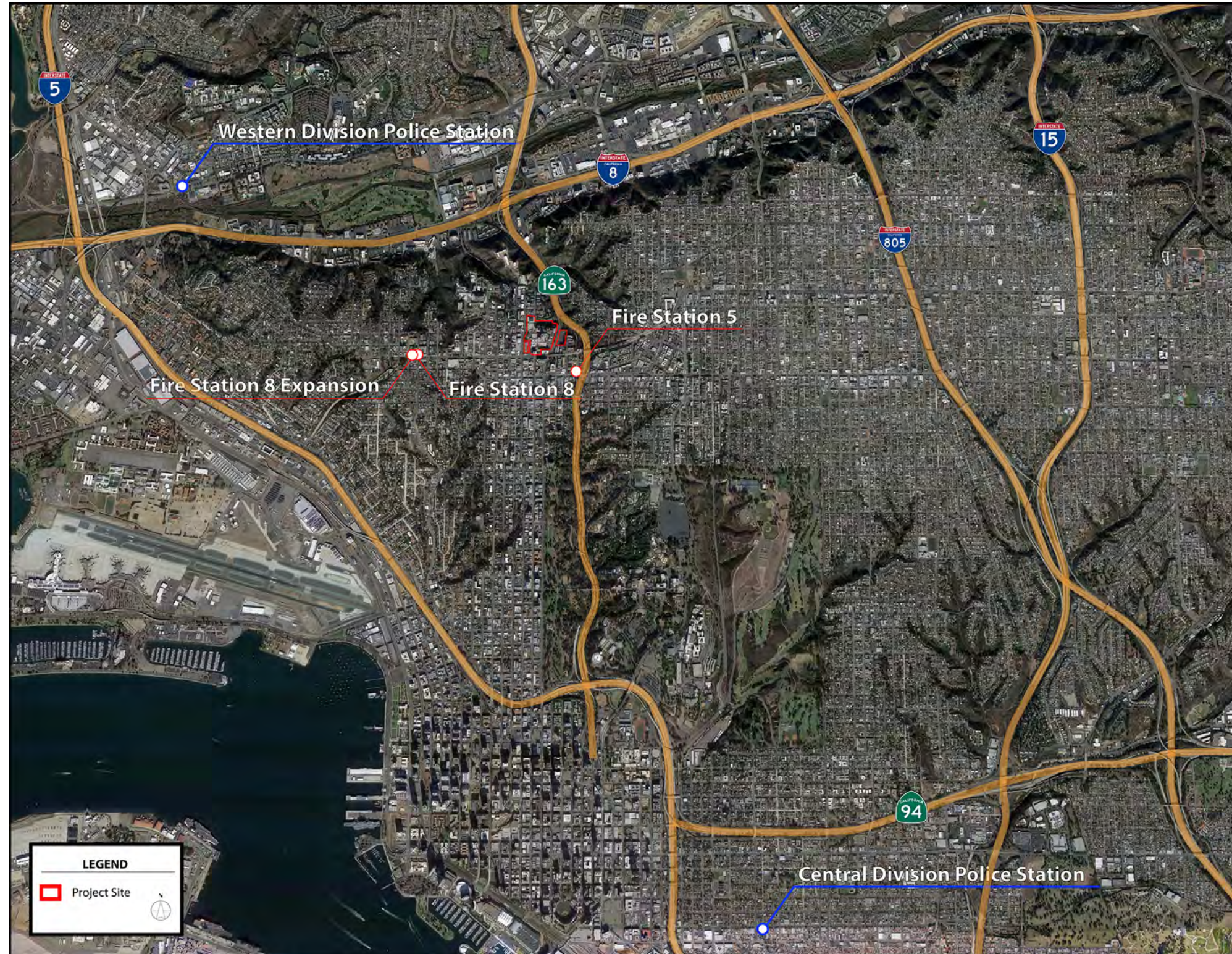


Figure 5.8-1. Location of Public Services

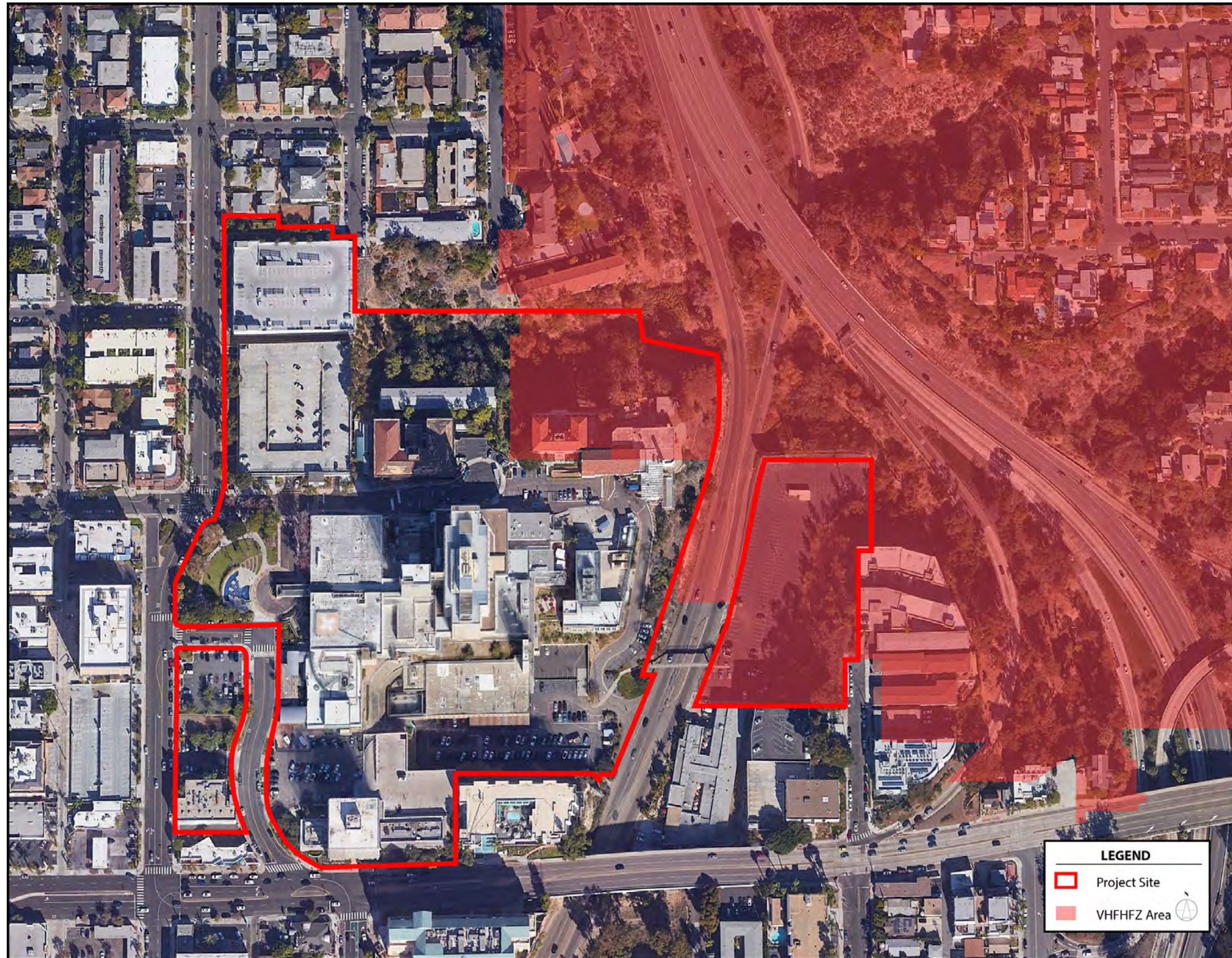


Figure 5.8-2. Very High Fire Hazard Severity Zone Map

5.9 Public Utilities

This section evaluates the potential public utilities impacts associated with the project. The following discussion is based on the *Waste Management Plan* prepared by KLR Planning (June 2022); *Water Demand Calculation for Scripps Mercy Hospital (Water Study)* prepared by KPFF Consulting Engineers (May 9, 2022); *Sewer Study* prepared by KPFF Consulting Engineers (June 2022), and *Water Supply Assessment (WSA)* prepared by the San Diego Public Utilities Department (July 2022). These documents are included as Appendix M, Appendix N, and Appendix O, Q respectively.

5.9.1 Existing Conditions

Public utilities are functions and facilities that serve the local population on a community-wide basis. Public utilities are generally provided to an area based on population, although each public utility provider has their own set of service standards.

The City provides the project site with water supplies, wastewater treatment services, and solid waste management services, as detailed below. Additionally, there are existing SDG&E easements and facilities on the project site that could be affected by the project.

5.9.1.1 Water

Water Facilities

Water service to the project site is provided by the City's Public Utilities Department (PUD). The PUD serves nearly 1.4 million people in an area containing a water system that extends over more than 404 square miles with numerous treated water storage facilities and a capacity of more than 200 million gallons of potable water. The PUD maintains a complex water system that includes nine surface reservoirs, three drinking water treatment plants, 29 reservoirs/storage tanks, approximately 49 pump stations, and more than 3,000 miles of pipeline.

Potable water lines in the project area are located within public rights-of-way. See Figure 5.9-1, *Existing Water Utilities*, for a map of the existing public water mains on Washington Street, Fifth Avenue, Fourth Avenue, and Sixth Avenue. As shown on Figure 5.9-1, along Fourth Avenue, there is a 12-inch asbestos-cement (AC) main which turns into an eight-inch AC line as it heads north and crosses Lewis Street. Fifth Avenue contains a 10-inch AC line, which joins the 12-inch line on Fourth Avenue as the streets merge. Near the intersection of Fifth Avenue and Washington Street, a 24-inch AC line transitions to a 12-inch AC line and runs west along Washington Street. On Sixth Avenue, there is a 12-inch polyvinyl chloride (PVC) main line, which converts to an eight-inch PVC line as it heads south toward Washington Street.

The PUD has developed a separate recycled water system to offset the demand for potable water. The goal is to reduce the City's dependence on imported water and increase reliability by providing non-potable water supplies. Recycled water service is available through the North City Water Reclamation Plant (northern service area) and the South Bay Water Reclamation Plant (southern service area). The project site is not located in an area where recycled water is available to serve the project.

Water Supply

The City's PUD serves the area within its incorporated boundaries on a retail basis for treated water, imports the majority of its raw water from the San Diego County Water Authority (SDCWA), and is a limited wholesaler to neighboring agencies. The SDCWA is recognized as the lead agency for procuring imported water to meet the present and long-term needs of the City and the San Diego region. The SDCWA purchases much of its water from the Metropolitan Water District (MWD). As a member agency of SDCWA, the City of San Diego assists SDCWA as needed in working with the MWD, the State Department of Water Resources (DWR), the County of San Diego, other local water agencies, and the private sector in efforts to satisfy the future water supplies and demands of the region. Below is a summary of these water supply sources.

Metropolitan Water District

MWD is a consortium of 26 public member agencies that provides imported water to nearly 19 million people in parts of Los Angeles, Orange, San Diego, Riverside, San Bernardino, and Ventura counties. MWD currently delivers an average of 1.5 billion gallons of water per day to a 5,200-square-mile service area. MWD imports its water from two main sources: the Colorado River [via the Colorado River Aqueduct (CRA) and the Sacramento and San Joaquin Rivers (via the State Water Project (SWP))]. The CRA is owned and operated by MWD, and extends approximately 242 miles from the Colorado River at Lake Havasu to Lake Mathews in Riverside County. From there, a series of canals, siphons, pipelines, and pump stations moves water west to several MWD reservoirs for local distribution. The principal structure conveying water south through the SWP is the California Aqueduct, which extends approximately 444 miles south from the Sacramento-San Joaquin Delta to Lake Perris in Riverside County. Additional water sources currently or potentially available to MWD include local supplies, groundwater banking, water transfers, seawater desalination, and water recycling.

San Diego County Water Authority

The SDCWA is an independent public agency that serves as a wholesale water supplier to its 24 member agencies. The SDCWA serves approximately 3.3 million residents in a service area of 923,778 acres¹. The SDCWA operates and maintains a regional water delivery system that consists of

¹ <https://www.sdcwa.org/wp-content/uploads/2020/11/overview-fs.pdf>

two major aqueducts and numerous related facilities, including approximately 310 miles of pipeline² and over 100 flow control facilities.

MWD is SDCWA's largest supplier, but SDCWA has pursued strategies over the last two decades to diversify San Diego's regional water supply portfolio and reduce the region's dependence on water deliveries from MWD, including through purchases from the Imperial Irrigation District (IID) and development of the Carlsbad Desalination Plant. In 1998, the SDCWA entered into a water conservation and transfer agreement with the IID, an agricultural district in neighboring Imperial County that receives Colorado River water. The agreement gave SDCWA a higher priority water right to Colorado River water, and includes strategies to provide SDCWA with a larger share of Colorado River water. These strategies involve voluntary conservation measures by Imperial Valley farmers, a canal lining project on the All American and Coachella Canals, and the transfer of water conserved by these measures directly to SDCWA. This agreement, along with amendments related to the 2003 Quantification Settlement Agreement, is expected to provide over 200,000 acre-feet per year (AFY) in 2021. In addition to developing its own regional supplies of water, SDCWA has also encouraged the development of additional local water supply projects, such as water recycling and groundwater projects.

In December 2015, SDCWA added desalinated water to its supply portfolio, with the completion of a seawater desalination facility capable of providing 50 mgd of potable water. SDCWA purchases up to 56,000 AFY of desalinated water from the Carlsbad Desalination Plant for their direct use or use by identified member agencies.

By 2018, SDCWA had reduced its dependency on MWD water purchases from 95 percent to 32 percent. SDCWA continues to pursue strategies for water supply diversification and reliability, such as additional seawater desalination projects, groundwater utilization, increased recycled water use, and the recent dam raise on the San Vicente Reservoir, which doubled its storage capacity. By 2020, local suppliers were projected to meet more than a quarter of the region's water demand.

In coordination with its 24 member agencies, the SDCWA developed its most recent Urban Water Management Plan (UWMP) to demonstrate regional water supply reliability over the next 25 years (2020 to 2045). Main components of the plan are the baseline demand forecasts under varying future climate conditions, conservation savings estimates, water demand projections, a water supply assessment for the region, supply reliability analysis, and scenario planning.

City of San Diego Public Utilities Department

In June 2021, the City issued its most recent UWMP, which outlines current and future water supplies and demands in the City's service area. The City is engaged in several strategies to increase water reliability, including the development of local groundwater supplies; increased utilization of

² <https://www.sdcwa.org/wp-content/uploads/2020/11/overview-fs.pdf>

recycled water, or potable reuse; continued conservation efforts; and ongoing strategic water resources planning. The UWMP projects water supply reliability for average years, single dry years, and multiple dry years, and concludes that the PUD will have sufficient water supplies to serve the City through the year 2045.

Conservation

PUD emphasizes the importance of water conservation to minimize water demand and avoid excessive water use. The Water Conservation Program implemented by the PUD aims to reduce water use in San Diego by offering various rebate programs, landscaping classes, education, and free water conservation surveys for property owners and tenants. Water conservation continues to be a priority throughout California, and water suppliers are tasked with adopting programs and policies designed to promote water conservation practices and implementing comprehensive public information and educational campaigns.

The City and its regional partners face significant issues with water supply and wastewater treatment. The region's reliance on imported water causes the water supply to be vulnerable to shortages and susceptible to price increases beyond the control of the City. The Pure Water San Diego Program will provide a safe, secure and sustainable local drinking water supply for San Diego through the use of advanced water purification technology to produce potable water from recycled water. The Pure Water Program is a 20-year (2015-2035) multi-phased water and wastewater capital improvement initiative that is expected to create 83 mgd of locally controlled water upon full implementation in 2035. The Pure Water Program will divert treated water from the Point Loma Wastewater Treatment Plant (WWTP) ocean outfall and recycle a valuable and limited resource that is currently discharged to the ocean. Phase 1 is expected to be online in Calendar Year (CY) 2025. Production is expected to be a staged ramp-up in flow with 30 mgd produced by the end of CY 2027. This will allow the City to reduce the amount of water it purchases in Fiscal Year (FY) 2027 and beyond. By 2035, Pure Water's Phase 2 will expand repurified water production from 30 to 83 mgd.

The City's General Plan includes The Conservation Element (CE), Public Facilities, Services and Safety Element (PF-E) and Housing Element (HE). These Elements present respective water resource, climate change adaptation, sustainability, water efficiency and conservation policies and goals. Examples include policies that call for drought resistant landscaping, optimization of the use of imported water supplies and improve reliability by increasing alternative sources (PF-H.1), and the long-range planning and integrated management of groundwater and surface water resources and protecting those resources by implementing guidelines for future development (CE-D-2).

The City's Climate Action Plan and Community Plans consider adaptive strategies that include consideration of the water-energy nexus, City per capita reduction goals, City water supply choices and sustainability of water supply and services.

5.9.1.2 Wastewater

Wastewater treatment service is provided by the PUD, which operates the Metropolitan Sewerage System (Metro System). Facilities in the Metro System include the Point Loma Wastewater Treatment Facility, ocean outfall pipes, pump stations, interconnecting interceptor sewers, and the North City and South Bay Water Reclamation Plants. The Metro System provides wastewater transportation, treatment, and disposal services to the San Diego region. The system serves a population of two million from 16 cities and districts generating approximately 190 mgd of wastewater. Planned improvements to the existing facilities will increase wastewater treatment capacity to serve an estimated population of 2.9 million through the year 2050.

The project is served by existing sewer mains located within the project site and adjacent streets. See Figure 5.9-2, *Existing Sewer Utilities*, for a map of existing sewer utilities public mains on Washington Street, Fifth Avenue, Fourth Avenue, and Sixth Avenue. As shown on Figure 5.9-2, a 12-inch PVC sewer line exists along Fourth Avenue and connects to a 12-inch vitrified clay pipe (VCP) line on Fifth Avenue. Along Washington Street, a six-inch VCP transitions to an eight-inch VCP at the Sixth Avenue intersection. This eight-inch VCP runs north along Sixth Avenue, and transitions to a larger 10-inch VCP towards the northeast corner of the project site, near the Sixth Avenue/SR 163 on-ramp.

5.9.1.3 Storm Water

The Scripps Mercy Hospital Campus project site has been previously graded and developed with the Scripps Mercy Hospital campus, consisting of medical office and hospital buildings, a College Building, surface and structured parking, internal streets and driveways, and landscaping (see Figure 2-3, *Project Location Map*). In its current development condition, the site consists of approximately of 74 percent impervious surface, with no expected off-site drainage.

Under existing conditions, the project site encompasses three drainage basins based on existing grading and site features: Basin 1, Basin 2, and Basin 3, as shown in Figure 5.9-3, *Existing Drainage*. Basin 1 consists of the drainage produced from the two multi-level parking structures in the northern part of the site along Fourth Avenue, as well as Lewis Street, the emergency department, the main hospital building, and Mercy Canyon. Stormwater from Basin 1 is collected within two catch basins on the west end of Lewis Street and connects to a 24 inch RCP running along Fourth Avenue, then between two on-site parking structures. The 24 inch RCP discharges as a surface outfall into Mercy Canyon in the northern part of the project site. Basin 2 contains the drainage produced from the Behavioral Health Clinic, College Building, Central Energy Plant, parking structure at the existing MOB (550 Washington Street), surface parking lots, and a portion of the main hospital building. Stormwater from Basin 2 is collected in downspouts from buildings and surface area drains in the parking lots and landscape areas. The collected runoff leaves the site via an 18 inch RCP, which travels north in Sixth Avenue. Basin 3 consists of the drainage produced from the MOB at 550

Washington Street and surrounding landscape area. Drainage from the MOB is collected in the building downspouts and northern street gutter on Washington Street.

5.9.1.4 Solid Waste

Solid waste management in the project area is provided by the City Environmental Services Department (ESD) and private collectors. The City provides refuse collection for residences located on dedicated public streets, provide adequate safe space and access for storage collection, and comply with regulations set forth in the SDMC. Other customers pay for services by City franchised private hauling companies.

City of San Diego ESD pursues waste management strategies that emphasize waste reduction and recycling, composting, and environmentally-sound landfill management to meet the City's long-term management needs.

Refuse collected from the area is generally taken to the Miramar Landfill, located just north of SR 52, between I-805 and SR 163. According to the Solid Waste Information System (SWIS) database maintained by CalRecycle, the Miramar Landfill had a remaining capacity of approximately 11,080,871 cy of solid waste as of January 30, 2020. Based on the remaining capacity and disposal rates, the Miramar Landfill is expected to close January 1, 2031; however, the amount of waste managed at the landfill is expected to decrease while the amount of composting and recycling will increase over time as the City strives to achieve the target 75 percent diversion rate identified in AB 341 and the City's Zero Waste Plan.

Currently, only two other landfills provide disposal capacity within the urbanized region of San Diego: the Sycamore and Otay Landfills. The Sycamore Landfill contains 349 disposal acres on a 491-acre site and is located to the east of Miramar, within the City of San Diego's boundaries. The Otay Landfill contains 230 disposal acres on a 464-acre site and is located within an unincorporated island of County land in the City of Chula Vista. The Sycamore and Otay Landfills are privately owned by Allied Waste Industries, Inc. The Sycamore Landfill is permitted to receive a maximum of 5,000 tons per day. The remaining capacity as of December 31, 2016 was 113,972,637 cy. This landfill is projected to cease operation on December 31, 2042. The Otay Landfill is permitted to receive 6,700 tons per day. It has a remaining capacity of 21,194,008 cy as of May 31, 2016. It is estimated that the Otay Landfill will cease operation on February 28, 2030.

5.9.1.5 SDG&E Facilities

Public electricity and gas services are provided by SDG&E. SDG&E is a regulated public utility that provides energy service to 3.6 million people through 1.4 million electric meters and 873,000 natural

gas meters in San Diego and southern Orange counties. SDG&E's service area spans 4,100 square miles.

The project is served by three electrical circuits and numerous gas lines. The electrical circuits serving the campus are located along Fourth Avenue, Fifth Avenue, Sixth Avenue, Eighth Avenue, Lewis Street and Washington Street. Portions of these circuits are located in easements on the campus. Electricity distribution lines in the project area are located underground. Each year, SDG&E allocates capital funds for the purposes of converting overhead electric distribution lines. Under provisions of Rule 20A established by the California Public Utilities commission, the City may designate major streets for undergrounding the overhead lines. In general, all new commercial, industrial, and residential developments are required to accept the underground service. Gas service is provided through both medium and high-pressure lines of up to twelve inches along Washington Street, Fourth Avenue, Fifth Avenue and Lewis Street. Gas lines are located in easements on the campus at the western side of the campus and along Lewis Street. Electrical and gas facilities, which pass through the campus, serve both the campus and off-site ratepayers.

5.9.2 Regulatory Framework

5.9.2.1 Federal

Federal Water Pollution Control Act of 1972 (Clean Water Act)

The principal federal law regulating water quality in the United States is the 1972 Federal Water Pollution Control Act, also known as the Clean Water Act. The fundamental purpose of the Clean Water Act is the protection of designated beneficial uses of water resources. The Clean Water Act establishes a system of water quality standards, discharge limitations, and permits; it requires states to adopt water quality standards to protect public health and welfare, enhance the quality of water, and serve the other purposes of the Clean Water Act. The Clean Water Act was amended in 1987 to include urban and stormwater runoff, which required many cities to obtain a National Pollutant Discharge Elimination System permit for stormwater conveyance system discharges.

Under Section 404 of the Clean Water Act, the U.S. Army Corps of Engineers regulates discharges of dredged or fill material into waters of the United States, requiring issuance of a Section 404 permit. Under Section 401 of the Clean Water Act, a state water quality certification must be obtained whenever an application for a federal permit for discharge of pollutants into waters of the United States is submitted, such as a Section 404 permit. The Section 401 certification requires that any activity affecting waters of the United States be in compliance with all applicable water quality standards, limitations, and restrictions.

Safe Drinking Water Act

Passed in 1974 and amended in 1986 and 1996, the Safe Drinking Water Act grants the U.S. Environmental Protection Agency the authority to set drinking water standards. Drinking water

standards apply to public water systems, which provide water for human consumption through at least 15 service connections, or regularly serve at least 25 individuals. There are two categories of drinking water standards, (1) the National Primary Drinking Water Regulations and (2) the National Secondary Drinking Water Regulations. The National Primary Drinking Water Regulations are legally enforceable standards that apply to public water systems. These standards protect drinking water quality by limiting the levels of specific contaminants that can adversely affect public health and are known or anticipated to occur in water. The National Secondary Drinking Water Regulations are non-mandatory guidelines for certain substances that do not present a risk to public health.

Water Resources Development Act

The Water Resources Development Act (passed December 2016) includes short-term provisions that sunset after five years. These provisions increase pumping operations in the Sacramento–San Joaquin River Delta at the highest levels allowed under biological opinions issued by state and federal wildlife agencies under the Endangered Species Acts, unless the pertinent agencies show that the increased pumping would cause additional adverse effects on listed fish (smelt and salmonid) species beyond the range of effects anticipated in those opinions, using the best scientific and commercial data available. The biological opinions have been subject to years of litigation between farming interests, urban water districts, fishing associations, and environmental groups, with the current versions upheld by the Ninth Circuit Court of Appeals. The new law's long-term provisions include significant funding authorizations that also should result in more water availability throughout California. These funding authorizations include long-term water infrastructure projects such as storage and groundwater projects; water recycling, reuse, and conservation projects; and design and construction of desalination projects. The additional funds will help supplement California's water bond.

5.9.2.2 State

California Assembly Bill 1881

AB 1881, the Water Conservation in Landscaping Act of 2006, requires the DWR to prepare an updated Model Water Efficient Landscaping Ordinance (Model Ordinance) in accordance with specified requirements to conserve water through efficient irrigation and landscaping. By January 1, 2010, local agencies were to adopt either the updated Model Ordinance or a local landscape ordinance that is at least as effective in conserving water as the Model Ordinance. Pursuant to state law, the City amended its Landscape Regulations (SDMC Chapter 14, Article 2, Division 4) and Landscape Standards in April 2016 to expand water conservation in landscaping. The Landscape Standards implement the requirements of the Landscape Regulations. All landscape plans and installations are required to be in compliance with the Landscape Standards.

California Integrated Waste Management Act (AB 939)

The California Integrated Waste Management Act was enacted by the California Legislature in 1989 with the goal of reducing dependence on landfills for the disposal of solid waste and to ensure an effective and coordinated system for the safe management of all solid waste generated within the state. Assembly Bill (AB) 939 mandated a reduction in the amount of solid waste disposed of by jurisdictions and required diversion goals of 25 percent by 1995 and 50% by the year 2000. The Integrated Waste Management Act established a hierarchy of preferred waste management practices, which include (1) source reduction, (2) recycling and composting, and (3) environmentally safe disposal by transformation or landfilling. It addresses all aspects related to solid waste regulation, including the details regarding the lead enforcement agency's requirements and responsibilities; the permit process, including inspections and denials of permits; enforcement; and site clean-up and maintenance. It requires that each county prepare a countywide integrated waste management plan that is reviewed at least once every 5 years to assure that waste management practices remain consistent with the practices defined in the California Public Resources Code. In 2013, AB 341 increased the waste diversion target to 75 percent by 2020.

AB 1826

In October 2014, Governor Brown signed AB 1826, Chesbro (Chapter 727, Statutes of 2014), which requires businesses to recycle their organic waste on and after April 1, 2016, depending on the amount of waste they generate per week. Organic waste means food waste, green waste, landscape and pruning waste, nonhazardous wood waste, and food-soiled paper waste that is mixed in with food waste. For businesses that generate eight or more cy of organic waste per week, this requirement began April 1, 2016, while those that generate four cy of organic waste per week must have an organic waste recycling program in place beginning January 1, 2017. This law also requires that on and after January 1, 2016, local jurisdictions across the state implement an organic waste recycling program to divert organic waste generated by businesses, including multi-family residential dwellings that consist of five or more units. Mandatory recycling of commercial organics would be phased in over time, and an exemption process is available for rural counties.

As of January 1, 2019, changes to AB 1826 require more sites to have organics collection service. Businesses and institutions that generate four or more cubic yards of solid waste per week must have organics collection service. Materials that must be composted include food waste, green waste, landscape and pruning waste, non-hazardous wood waste, and food-soiled paper.

AB 1594

"Alternative daily cover" (ADC) is cover material other than earthen material placed on the surface of the active face of a municipal solid waste landfill at the end of each operating day to control vectors, fires, odors, blowing litter, and scavenging. CalRecycle has approved 11 ADC material types that can currently be reported as diversion: ash and cement kiln dust, treated auto shredder waste, construction and demolition waste, compost, green material, contaminated sediment, sludge, and

shredded tires. Generally, these materials must be processed so that they do not allow gaps in the exposed landfill face (CalRecycle 2015a).

Pursuant to California Public Resources Code Section 41781.3 and AB 1594, beginning January 1, 2020, the use of green material as ADC will not constitute diversion through recycling and will be considered disposal. "Green material" is defined as any plant material that is either separated at the point of generation, or separated at a centralized facility that employs methods to minimize contamination. Green material includes, but is not limited to, yard trimmings, untreated wood wastes, paper products, and natural fiber products. Green material does not include treated wood waste, mixed demolition or mixed construction debris, or manure and plant waste from the food processing industry, alone or blended with soil. As of August 1, 2018, local jurisdictions are required to include information in an annual report on how the local jurisdiction intends to address the diversion requirements and divert green material that is being used as ADC. A jurisdiction that does not meet certain diversion requirements as a result of not being able to claim diversion for the use of green material as ADC would be required to identify and address, in an annual report, barriers to recycling green material and, if sufficient capacity at facilities that recycle green material is not expected to be operational before a certain date, to include a plan to address those barriers.

California Solid Waste: Diversion (AB 341)

AB 341, adopted in 2011, amended AB 939 by making a legislative declaration that it is the policy goal of the State of California that not less than 75% of solid waste generated be reduced, recycled, or composted by the year 2020. While a policy goal may not be legally enforceable, city and/or county ordinances and other mechanisms make AB 341 provisions enforceable within their jurisdictions. AB 341 also required a business (defined to include a commercial or public entity) that generates more than 8 cubic yards of commercial solid waste per week or is a multifamily residential dwelling of five units or more to arrange for recycling services, starting July 1, 2012.

Short-Lived Climate Pollutants (SLCP): Organic Waste Methane Emissions Reductions (SB 1383)

In September 2016, Governor Brown signed into law SB 1383 (Lara, Chapter 395, Statutes of 2016), establishing methane emissions reduction targets in a statewide effort to reduce emissions of short-lived climate pollutants (SLCP) in various sectors of California's economy. The new law codifies the California Air Resources Board's Short-Lived Climate Pollutant Reduction Strategy PDF download , established pursuant to SB 605 (Lara, Chapter 523, Statutes of 2014), to achieve reductions in the statewide emissions of short-lived climate pollutants. Actions to reduce short-lived climate pollutants are essential to address the many impacts of climate change on human health, especially in California's most at-risk communities, and on the environment.

As it pertains to CalRecycle, SB 1383 establishes targets to achieve a 50 percent reduction in the level of the statewide disposal of organic waste from the 2014 level by 2020 and a 75 percent reduction

by 2025. The law grants CalRecycle the regulatory authority required to achieve the organic waste disposal reduction targets and establishes an additional target that not less than 20 percent of currently disposed edible food is recovered for human consumption by 2025.

California Urban Water Management Act

As part of this Act, UWMPs are prepared, adopted, and administered by urban water suppliers and submitted to the California Department of Water Resources. These plans support the suppliers' long-term resource planning to ensure that adequate water supplies are available to meet existing and future water needs over a 20-year planning time-frame. The plans describe and evaluate sources of supply, reasonable and practical efficient uses, reclamation, and demand management activities. Within UWMPs, urban water suppliers must assess the reliability of water sources over a 20-year planning time frame, describe demand management measures and water shortage contingency plans.

AB 1668 and SB 606

In May 2018, Governor Jerry Brown signed into law Assembly Bill 1668 and Senate Bill 606, imposing a number of new or expanded requirements on state water agencies and local water suppliers and providing for significantly greater state oversight of local water suppliers' water use, even in non-drought years. Among other things, AB 1668 and SB 606 require the State Water Resources Control Board (SWRCB), in coordination with the DWR, to establish long-term urban water use efficiency to include components for indoor residential use, outdoor residential use, water losses and other uses. Each retail water supplier across the state will have a water use target based on efficiency standards for indoor residential water use, landscape irrigation, and water loss. These targets are currently being developed and projected to be adopted in 2022. Retail water suppliers will be required to meet demand targets by 2027 or face penalties set by SWRCB.

Senate Bill 610 Water Supply Assessment

The SB 610 Water Supply Assessment (SB 610 WSA) is intended to be internally consistent with the Urban Water Management Plan and applicable City General Plan Elements. WSAs are intended to closely link the demands of a set of proposed land uses contained in a proposed project with the water supplies available for that development and evaluate cumulative demands in the water service area. The standard for the certainty and reliability of water supplies sufficient to meet the demands of the proposed development is more exacting than that required for the Urban Water Management Plan; a foundational document to the SB 610 WSA.

Ultimately, because the SB 610 WSA is a source document for an EIR prepared for a proposed project pursuant to CEQA, it must provide detailed evidence showing that sufficient water will be available to meet water demands for the water purveyor's existing and planned land uses over a 20-year planning horizon, including single and multiple dry years, provide a discussion of increased

demands and may evaluate practical efficient use of alternative water sources. The types of projects subject to SB 610 are the following:

- Residential developments of more than 500 units;
- Shopping centers or businesses employing more than 1,000 people or having more than 500,000 square feet of floor space;
- Commercial office buildings employing more than 1,000 people or having more than 250,000 square feet of floor space;
- Hotels or motels having more than 500 rooms;
- Industrial, manufacturing, or processing plants or industrial parks planned to house more than 1,000 people or having more than 650,000 square feet of floor space;
- Mixed-use projects that include one or more of the above types of projects; and
- Projects that would demand an amount of water equivalent to, or greater than, the amount of water required by a 500-dwelling unit project.

California Public Utilities Commission (CPUC) Code Sections 851 – 857

Public Utilities Code Sections 851 - 857 requires SDG&E to seek CPUC approval prior to disposing of SDG&E property or allowing encroachments within SDG&E easements. Because the project would require modifications to SDG&E facilities and easements, the CPUC will make a determination regarding such modifications.

5.9.2.3 Local

Drought Restrictions

The City of San Diego has year-round permanent mandatory water restrictions in place. These restrictions are designed to promote water conservation as a permanent way of life in San Diego. In July 2016, the City moved from a Level 2 Drought Alert to a Level 1 Drought Watch (Resolution R-310598), lifting some of the water-use restrictions that were put in place to mitigate the multi-year drought that California had been experiencing. A Level 1 Drought Watch includes voluntary water-use restrictions that limit landscape watering and the washing of mobile equipment. Additionally, permanent mandatory water use restrictions are in place, with the goal of promoting water conservation as a way of life in San Diego.

Effective June 10, 2022, the City of San Diego once again began implementing more stringent water restrictions for all water customers following a statewide order from Governor Gavin Newsom. At the governor's direction, the SWRCB adopted an emergency water conservation regulation calling on local water agencies to take appropriate action that will conserve water throughout California. Level 2 water restrictions include the following actions for all City of San Diego water customers:

- Areas with no irrigation system must use a hand-held hose with a shutoff nozzle, hand-held container or a garden hose sprinkler system on a timer.
- Irrigation is prohibited during and within 48 hours of a rain event.
- Landscape irrigation is limited to no more than three days per week before 10 a.m. or after 6 p.m. This does not apply to commercial growers or nurseries, nor to the irrigation of golf course greens and trees.
- Use of recycled or non-potable water, when available, is required for construction purposes.
- Prohibition of irrigating non-functional turf with potable water.
- Washing of vehicles at residences is prohibited. Washing is still permitted at commercial car washes.

City of San Diego Policy for a Sustainable Water Supply (CP 400-15)

CP 400-15 includes policies to assure an adequate water supply for the City. For example, it is the policy of the City Council to:

- Support economically sound activities that create an affordable and reliable water supply to attract, retain and expand business, and promote an excellent quality of life for residents.
- Support decisions that are aligned with the City's Urban Water Management Plan and the Conservation Element of the City's General Plan.
- Support the use of Water Supply Assessments related to land-use decisions.
- Support and encourage low-water use plumbing, landscaping and irrigation materials in public and private development.
- Support economically sound activities that reduce the City's reliance on imported sources of water and increase local supplies.
- Support the economically sound development of a diverse portfolio of local water supplies to meet the City's present and future needs.
- Support cost-effective programs to recharge, protect and improve the yield from local and regional groundwater basins.

City of San Diego Ordinance O-17327 (Mandatory Water Reuse Ordinance)

This ordinance, adopted by the City Council in 1989, requires that "recycled water shall be used within the City where feasible and consistent with the legal requirements, preservation of public health, safety, and welfare, and the environment." All development projects are required to install an additional water pipeline reserved for reclaimed water, based on the project's location within an existing or proposed recycled water service area. Compliance with this ordinance for new development is made a condition of tentative maps, land use permits, etc. Furthermore, it is the policy of the City that use of potable water for non-domestic uses shall be contrary to the City policy and shall not be considered the most beneficial use of a natural resource and shall be avoided to the maximum extent possible.

Zero Waste Plan

State of California regulations for solid waste (California Public Resources Code, Section 41700 et seq.) require that each region have a plan with adequate capacity to manage or dispose of solid waste for at least 15 years into the future. The City of San Diego's Zero Waste Plan (City of San Diego 2015b) establishes goals to target 75% diversion by 2020, 90% diversion by 2035, and "zero" by 2040 and outlines potential diversion strategies to help the City achieve these goals.

The City's Zero Waste Plan, a component of the City's CAP, was approved and adopted by the City Council on July 13, 2015. The Zero Waste Plan lays out strategies to be implemented by the City to accomplish the following goals:

- Target 75 percent diversion by 2020, 90 percent diversion by 2035, and "zero waste" by 2040 by identifying potential diversion strategies for future action. To increase the City's waste diversion rate to 75 percent will require an estimated additional 332,000 tons per year to be diverted from landfill disposal;
- Demonstrate continuous improvement towards a goal of zero waste to landfills;
- Emphasize education by renewing City public information efforts;
- Promote local policies and ordinances and legislation at the state level that encourage manufacturers, consumers, and waste producers to be responsible for waste;
- Investigate appropriate new technologies; and
- Re-emphasize market development at the local and State level.

The City's ESD estimates that compliance with existing City codes and ordinances alone (including the Refuse and Recyclable Materials Storage Regulations [SDMC Chapter 14, Article 2, Division 8], Recycling Ordinance [SDMC Chapter 6, Article 6, Division 7], and the Construction and Demolition Debris Deposit Ordinance [SDMC Chapter 6, Article 6, Division 6]) would achieve only an approximate 40 percent diversion rate, which is substantially below the current 75 percent diversion level targeted by the state and the goals of the City's Zero Waste Plan.

The Recycling Ordinance requires all single-family, multi-family, and commercial uses to participate in a recycling program by separating recyclable materials from other solid waste and depositing the recyclable materials in the approved recycling containers. The Construction and Demolition Debris Deposit Ordinance requires project applicants to submit a Waste Management Form with the building permit or demolition/removal permit, to provide a general estimate of the total waste generated by the project including how much will be recycled. The code requires a minimum diversion rate of 50 percent for building permits or demolition/removal permits issued within 180 calendar days of the effective date of the ordinance, and a minimum diversion rate of 75 percent for building permits or demolition/removal permits issued after 180 calendar days from the effective date of the ordinance, provided that a certified recycling facility which accepts mixed construction and demolition debris is operating within 25 miles of the City Administrative Building.

5.9.3 Impact Analysis

5.9.3.1 Issue 1

Issue 1 Would the project result in the need for new systems, or require substantial alterations to existing utilities, the construction of which would create physical impacts with regard to the following utilities: water, sewer, and solid waste disposal?

Impact Threshold

Based on the City Thresholds, impact analysis of public utilities should focus on the physical impacts associated with the construction or expansion of existing utilities. Impacts to public utilities would be significant if the removal, construction, and/or relocation of the utility would:

- Result in direct impacts from the construction of new or expanded public utilities needed to serve the project, and/or
- Construct, demolish, or renovate 1,000,000 square feet or more of building space, which would generate approximately 1,500 tons or more of waste. For projects over 1,000,000 square feet, a significant impact would result if compliance with the City's waste management ordinances, and the Waste Management Plan fails to reduce impacts of such projects to below a level of significance and/or if a Waste Management Plan for the project is not prepared and conceptually approved by ESD prior to distribution of the draft environmental document for public review.

Additionally, the City Thresholds note the following guidance should be considered in determining whether the utility work could have significant environmental impacts.

Would removal, construction, and/or relocation of the utility:

- Be compatible with existing and adjacent land uses?
- Change drainage or affect water quality/runoff?
- Affect air quality?
- Affect biological resources including habitat? Consider access road locations.
- Have a negative aesthetic effect? Visual simulations might be necessary.
- Impact historical resources?
- Increase noise levels to sensitive receptors?

Analysis

Water

The project proposes new water lines and connections to the City water system are represented in Figure 5.9-4, *Proposed Water System Modifications*. The proposed water connections to the public water mains would occur on the west and south side of the campus. The MOB would connect to the City main along Fourth Avenue, which transitions from 12 inches to eight inches as it approached the MOB. Water services proposed for Hospital 1 are located on Fifth Avenue, which contains a 10-inch AC water main that transitions to a 12-inch PVC, then eventually joins the 12-inch line along Fourth Avenue. The proposed water connections on Washington Street would serve the proposed Hospital Building and would connect to a 12-inch main along Washington Street. Lastly, the existing public water main in Lewis Street, east of Fourth Avenue would be privatized and serve Hospital II.

Proposed water utilities have been assessed by the City for conformance to the City's Facility Design Guidelines, the California Fire Code, and PUD level of service requirements. The Water Study determined pipeline sizes for the public water system only. Private development water systems would be developed for each lot and submitted as part of individual site plan development. Construction of water facilities to serve the project would be subject to standard industry measures and the SDMC. The physical construction of these facilities has been analyzed within the various sections of this EIR, as all facilities would be a part of the project's proposed grading and construction plans.

Development of the project would not trigger the need for new water facilities or the expansion of those facilities beyond what is proposed for the project. Adequate services are available to serve the project. Impacts would be less than significant.

Wastewater

Based on the Sewer Study and as shown in Table 5.9-1, the project's existing sewer demand amounts to 200,316 gallons per day (gpd). Anticipated sewer demands for the proposed project is 351,502 gpd. The existing eight-inch pipe on Sixth Avenue is at 51.9 percent capacity with existing conditions, which exceeds the capacity of 50 percent maximum. Since this pipe exceeds capacity under existing conditions, increased sewer demands from the project would raise the capacity even further over the maximum capacity. In order to meet the 50 percent maximum requirement, the existing eight-inch pipe would need to be upsized to a 10-inch pipe. Under existing conditions, if this pipe were upsized to a 10-inch pipe, the capacity of the pipe would be 37.1 percent full. Under proposed conditions, if the pipe were upsized to a 10-inch pipe, the capacity of the pipe would be 37.1 percent full. All other existing lines for both existing condition and proposed condition fall below 50 percent full. Therefore, impacts to the existing sewer system due to the project would be less than significant following the upgrade of the eight-inch VCP pipe to a 10-Inch VCP in Sixth Avenue.

Construction of wastewater facilities to serve the project would be subject to standard industry measures and the SDMC. The physical construction of these facilities has been analyzed within the various sections of this EIR, as all facilities would be a part of the project's proposed grading and construction plans. Development of the project would not trigger the need for new wastewater facilities or the expansion of those facilities beyond what is proposed for the project. Adequate services are available to serve the project. Impacts would be less than significant. Subsequently, the project would not adversely affect existing wastewater treatment services and adequate services are available to serve the project without requiring new or expanded entitlements. The project would result in less than significant impacts.

Storm Water

An existing City of San Diego 24-inch storm drain line is located north of the proposed MOB site, within the 15-foot-wide storm drain easement. This storm drain line is proposed to be protected in place and the width of existing easement is complying with the latest City of San Diego Drainage Design Manual.

Storm water control for the project has been designed in accordance with City standards per the City's Drainage Design Manual. Existing storm water drainage from the project site is collected in lateral pipes that converge into larger pipe and convey runoff out of the project site. There are three major discharge locations on the project site: Mercy Canyon, storm manhole on Sixth Avenue, and near the intersection of Fourth Avenue and Washington Street. The project would install biofiltration planters to collect the runoff from MOB, Lewis Street, and the western half of Hospital II. This runoff would be conveyed off-site to an existing 24-inch RCP along Fourth Avenue which would ultimately discharge the treated stormwater out to Mercy Canyon. Roof drains and catch basins throughout the site would capture and treat runoff in DMAs by directing storm water to BMPs for Hospital I, HSB and parking structure, and the loading dock area. Storm water in HSB and HSB Plaza will be treated by the south side of Hospital I and discharge towards the existing storm line on Sixth Avenue. Runoff generated on Hospital I and Loading Dock would be first detained in large cisterns in order to comply with hydromodification requirements defined by the San Diego Regional Model BMP Design Manual. The flow controlled runoff from cisterns will be treated via a compact biofiltration chamber (Modular Wetland) before discharging to existing 18-inch CMP main located on Sixth Avenue. Runoff exceeding the hydromodification threshold would be captured and conveyed off-site via overflow drains within the BMPs.

The project would implement appropriate source control, site design, and treatment-control BMPs during construction and post-construction, as well maintenance efforts in conformance with the City of San Diego's Stormwater Standards (May 2021). Implementation of the proposed BMPs would preclude significant potential impacts to water quality from storm water runoff. Additionally, the project would comply with associated requirements including the NPDES Construction General, Municipal and Groundwater permits. These requirements have been reviewed by qualified City staff and would be reverified during the ministerial process. Adherence with the standards would

preclude considerable degradation to water quality. Therefore, impacts from storm water would be less than significant.

Solid Waste

A Waste Management Plan (WMP) was prepared for the project pursuant to the City Determination Thresholds. The WMP for the project is designed to implement and adhere to all city ordinance and regulations with regards to waste management. Such adherence would ensure that solid waste impacts are mitigated to below a level of significance. Provided below is a discussion of solid waste generation associated with demolition, grading, construction, and operation of the project.

Grading

The project would require approximately 155,000 cubic yards of cut and 42,500 cubic yards of fill. Approximately 112,500 cubic yards of material would be exported to other available ongoing construction sites and/or brought to a facility for recycling and handling.

Demolition

The project proposes demolition of existing structures, including a facility building and generator building on the northeast side of the campus, Behavioral Health Clinic and Main Hospital building at the center of the campus, 550 Washington Building and adjoining parking structure on the southwest corner of the campus, and Mercy Manor and Parking Structure 4.1 on the northwest corner of the campus. Demolition would amount to a total of 873,497 square feet of buildings. Total demolition square footage is analyzed because, while demolition would be phased over the life of the project, the impact to solid waste is directly correlated to total waste generated.

Construction

Construction for the project would occur over an extended period of time. Construction activities would generate packaging materials and unpainted wood, including wood pallets, and other miscellaneous debris. Construction debris would be separated on-site into material-specific containers to facilitate reuse and recycling and to increase the efficiency of waste reclamation.

Management of construction material and recycling would adhere to industry standards such that refuse that cannot be reused or recycled is disposed of at appropriate facilities. Provided below is a list of general procedures which would be implemented such that 75 percent of construction waste, in accordance with AB 341 and current City diversion targets for project-specific waste management plans, would be diverted from disposal in landfills in accordance with City requirements:

- Determine recycling, salvage, reuse, and disposal options before the job begins.
- Donate materials that can be reused to charities and nonprofit agencies.
- Choose refuse haulers based on their responsiveness to the projects recycling plan.
- Choose a recycling facility, such as Miramar Landfill, based on its fees, geographic proximity to the project site, and diversion rate.

- Solid waste management coordinator would be responsible for educating contractors and subcontractors regarding waste management plan requirements.
- Clearly identify recycling areas with large bilingual signs.
- Place recycling bins in areas that would minimize misuse or contamination by employees and the public.

To facilitate management of construction materials, as individual developments come forward, the developer shall identify one person or agency connected with the proposed development to act as Solid Waste Management Coordinator, whose responsibility it becomes to work with all contractors and subcontractors to ensure material separation and coordinate proper disposal and diversion of waste generated. The Solid Waste Management Coordinator would help to ensure all diversion practices outlined in this Waste Management Plan are upheld and communicate goals to all contractors involved efficiently.

The responsibilities of the Solid Waste Management Coordinator, include, but are not limited to, the following:

- Review the Solid Waste Management Plan including responsibilities of Solid Waste Management Coordinator.
- Work with contractors to estimate quantities of each type of material that would be salvaged, recycled, or disposed of as waste, then assist contractors with documentation.
- Review and update procedures as needed for material separation and verify availability of containers and bins needed to avoid delays.
- Review and update procedures for periodic solid waste collection and transportation to recycling and disposing facilities.

The contractors would perform daily inspections of the construction site to ensure compliance with the requirements of the Waste Management Plan and all other applicable laws and ordinances and report directly to Solid Waste Management Coordinator. Daily inspections would include verifying the availability and number of dumpsters based on amount of debris being generated, correct labeling of dumpsters, proper sorting and segregation materials, and salvaging of excess materials.

Construction debris would be separated onsite into material-specific containers, corresponding to the materials types to facilitate reuse and recycling and to increase the efficiency of waste reclamation. In accordance with City WMP requirements, the City's Construction and Demolition Ordinance, the City's current diversion targets, and AB 341, 89 percent of the construction materials generated by the project are targeted for diversion.

Occupancy

While the construction phase for each building constructed within the Scripps Mercy Hospital Campus occurs as a one-time waste generation event, occupancy requires an on-going plan to

manage waste disposal to meet the waste reduction goals established by the City and State. Future developments within the Scripps Mercy Hospital Campus would comply with the City's Recycling Ordinance. All recyclable materials will be delivered to an appropriate recycling facility(s), such as the Miramar Recycling Center, located at 5165 Convoy Street, San Diego, California 92111.

The project could develop with as much as 1,275,000 square feet of office and commercial (including institutional and utilities) developments. At full buildout, this would require a minimum of 2,448 square feet of each exterior refuse, organic waste, and recyclable material storage area for a total of approximately 7,344 square feet minimum of exterior refuse and recyclable material storage area.

On-site recycling services shall be provided for all uses within the Scripps Mercy Hospital Campus. The Scripps Mercy Hospital Campus would participate in a recycling program by separating recyclable materials from other solid waste and depositing the recyclable materials in the recycling container provided for the occupants. Recycling services are required by Section 66.0707 of the City of San Diego LDC. Based on current requirements, these services shall include the following:

- Continuous assessment of new technologies for recycling, composting, cogeneration, and disposal to maximize efficient use of resources and environmental protection;
- Collection of recyclable materials as frequently as necessary to meet demand;
- Collection of plastic bottles and jars, paper, newspaper, metal containers, cardboard, and glass containers;
- Collection of other recyclable materials for which markets exist, such as scrap metal, wood pallets;
- Collection of food waste for recycling by composting, where available;
- Utilization of recycling receptacles or containers which comply with the standards in the Container and Signage Guidelines established by the City of San Diego Environmental Services Department;
- Designated recycling collection and storage areas; and
- Signage on all recycling receptacles, containers, chutes, and/or enclosures which complies with the standards described in the Container and Signage Guidelines established by the City of San Diego Environmental Services Department.

For facilities within the Scripps Mercy Hospital Campus (as required by Section 66.0707 of the City of San Diego LDC), the building management or other designated personnel shall ensure that occupants are educated about the recycling services as follows:

- Information, including the types of recyclable materials accepted, the location of recycling containers, and the occupants responsibility to recycle shall be distributed to all occupants annually;
- All new occupants shall be given information and instructions upon occupancy; and

- All occupants shall be given information and instructions upon any change in recycling service to the commercial facility.

Additionally, measures for reducing waste include contract stipulations and/or tenant programs. The owner, building manager, or other designated personnel shall consider the following:

- Require vendors to use reusable and/or recyclable food containers/flatware;
- Have vendors work with suppliers to reduce packaging materials;
- Choose preferred products with a high level of post-consumer content;
- Set printers to double-sided;
- Reduce electronic waste.

The project would implement all measures and requirements in the WMP to the fullest degree of accuracy and efficiency. Additionally, the WMP plan for the Scripps Mercy Hospital Campus project is designed to implement and adhere to all City ordinance and regulations with regards to waste management.

SDG&E Facilities

The project would require modifications to SDG&E facilities as part of the overall construction activities. All work would occur within the development footprint of the existing medical campus and adjacent public streets and would not result in substantial environmental effects.

Portions of the existing twelve-inch high-pressure gas line along Washington Street, Fifth Avenue, Lewis Street and in private easements would be relocated to avoid conflicts with proposed improvements near the intersection of Lewis Street and Fourth Avenue associated with the MOB. Any existing easements associated with these SDG&E facilities would be quit-claimed, as part of the relocation process. To improve electrical resiliency for the hospital campus, a separate SDG&E electrical yard and point of connection would be provided along Sixth Avenue.

All new and relocated SDG&E facilities would be designed and constructed per the latest SDG&E standards. The anticipated interruption to the existing services during the relocation work would be coordinated by SDG&E and comply with the appropriate SDG&E polices. Furthermore, the new routing of gas main would reduce the chance of potential conflicts with the future construction activities that are anticipated around the Scripps Mercy campus, providing a higher level of safety to the hospital staff, visitors, and neighbors.

Significance of Impacts

Water

On-site water infrastructure would be designed and sized to meet the project's water needs in conformance with City standards. The physical construction of these facilities has been analyzed within the various sections of this EIR, as all facilities would be a part of the project's proposed grading and construction plans. Development of the project would not significantly increase the demand for water or services, and as such, would not trigger the need for new water facilities or the expansion of those facilities beyond what is proposed. Therefore, project impacts to water infrastructure would be less than significant.

Wastewater

Based on the available capacity of existing sewer facilities, the increase in demand associated with wastewater utilities would not be significant. Impacts related to wastewater infrastructure would be less than significant. Construction of wastewater facilities to serve the project would be subject to standard industry measures and the SDMC. The physical construction of these facilities has been analyzed within the various sections of this EIR, as all facilities would be a part of the project's proposed grading and construction plans. The project would not adversely affect existing wastewater treatment services, and adequate services are available to serve the project without requiring new or expanded entitlements. The project would result in less than significant impacts.

Storm Water

Implementation of the proposed BMPs would preclude significant potential impacts to water quality from storm water runoff. Additionally, the project would comply with associated requirements including the NPDES Construction General, Municipal and Groundwater permits. These requirements have been reviewed by qualified City staff and would be reverified during the ministerial process. Adherence with the standards would preclude considerable degradation to water quality. Therefore, impacts from storm water would be less than significant.

Solid Waste

According to the City thresholds, projects that are 1,000,000 square feet or more generating sufficient waste (1,500 tons) have potentially significant direct impacts on the solid waste services and facilities. The project would generate solid waste during the demolition, grading, construction, and operational phases. However, with implementation of the strategies outlined in the project-specific WMP through conditions of approval, as well as compliance with applicable City regulations related to solid waste, the project would not require new or expansion of solid waste facilities, including landfills. Therefore, impacts would be less than significant.

SDG&E Facilities

On-site SDG&E electrical and gas utilities would require modifications as part of the project. The physical construction for these activities has been analyzed within the various sections of this EIR, as

all facilities would be a part of the project's proposed construction plans. Development of the project would not significantly increase the demand for energy, as summarized in Chapter 7.0, *Effects Found Not To Be significant*, of this EIR, and would not trigger the need for new facilities or the expansion of those facilities beyond what is proposed. Therefore, project impacts associated with electrical and gas utilities would be less than significant.

Mitigation Measures

Mitigation would not be required.

5.9.3.2 Issues 2 and 3

Issue 2 *Would the project result in the use of excessive amounts of water?*

Issue 3 *Does the project propose landscaping which is predominantly non-drought resistant vegetation?*

Impact Thresholds

Based on the City Thresholds, a project could have a significant public utilities impact related to water if it would:

- Water Supply – Result in the need to comply with SB 610 to determine the availability of water to meet the projected water demands of the project for a 20-year planning horizon, including single and multiple dry years, or result in the need to comply with SB 221 to determine whether the decision-maker can make a finding that the project's water demands for the planning horizon will be met before approving a Tentative Map. The types of projects subject to SB 610 and SB 221 include the following:
 - Residential developments with more than 500 units;
 - Shopping centers or businesses employing more than 1,000 people or having more than 500,000 SF of floor space;
 - Commercial office buildings employing more than 1,000 people or having more than 250,000 SF of floor space;
 - Mixed use projects that include one or more of the projects listed above; or
 - Projects that would demand an amount of water equivalent to, or greater than, the amount of water required by a 500-dwelling unit project.
- Water Conservation
 - Use an excessive amount of potable water; or
 - Propose predominately non-drought resistant landscaping and excessive water usage for irrigation and other purposes.

Analysis

Water Supply

The project's water demand is shown below in Table 5.9-1, *Planned Water Demands for the Project*. There are no feasible alternative, non-potable water sources in the project vicinity. PUD evaluation of combined service area demand and supply projections result in a finding of sufficient overall planned water supply to serve the SB 610 WSA's identified cumulative water demands in normal, single-dry year, and multiple-dry water year forecasts within a 20-year projection. The SB 610 WSA concluded that there is sufficient water for the project.

In addition, the WSA found that the proposed water demand projections for the project are included in the regional water resource planning documents of the City and SDCWA. The projected water demands of the project are net zero after the metered demands for the buildings to be demolished are subtracted from the proposed demands. Water demands for new development assume all mandatory water efficiency standards would be met and result in more water efficient buildings and landscapes as compared to older developments. The 2020 UWMP establishes that the Pressure Zone affiliated with the project location has a planned net capacity of 19,186 acre-feet per year (AFY). Therefore, the Pressure Zone has adequate capacity for the project. There would be sufficient water supply planned to serve the project's future water demands within the PUD service area in normal, single-dry, and multiple-dry water year forecasts.

Water Conservation Devices

The project would not result in the use of excessive amounts of potable water. The project would develop in accordance with Title 24 of the CCR.

The project would incorporate water conservation measures, such as planting native and drought-tolerant landscape materials and plant species, and providing low-flush toilets, low-flow faucets, low-flow sprinkler heads, drip irrigation, and smart irrigation with automatic controllers in irrigation systems to reduce water usage. These items comply with the California Green Building Standards Code and CAP, and are required project elements that comprise project conditions.

Drought Tolerant Landscaping

Overall, the project would include native and naturalized drought-tolerant species consistent with the Landscape regulations. All landscape and irrigation would conform to the city-wide landscape regulations, the City of San Diego Land Development Manual, Landscape Standards, and all other landscape-related City and regional standards. An automatic, electrically controlled irrigation system would be provided, as required by LDC 142.0403(c).

Additionally, all irrigation design and maintenance would conform to the City of San Diego's latest water use restrictions, and the project's irrigation system has been designed to meet the City's water

efficient landscape ordinance contained within Chapter 14, Article 2, Division 4, *Landscape Regulations*, of the Municipal Code.

Use of drought-tolerant plants in accordance with the City's LDC, and incorporation of smart irrigation technology and hardscape elements would avoid the need for excessive irrigation. The project would also be required to comply with the mandatory measures associated with the City's Water Conservation Program. Impacts related to water usage for irrigation would therefore be less than significant.

Significance of Impacts

Water Supply

The project would be consistent with regional water resource planning and there would be sufficient water supply to meet the projected demands of the project. Impacts related to potable water supplies and demand from project implementation would be less than significant.

Water Conservation Devices

The project would incorporate water sustainable design features, techniques, and materials that would reduce water consumption. Impacts would be less than significant.

Drought Tolerant Landscaping

The project would include landscaping consisting of native and naturalized drought-tolerant species consistent with the Landscape regulations. Impacts would be less than significant.

Mitigation Measures

Mitigation would not be required.

Table 5.9-1. Planned Water Demands for the Project

Building	Building Use	Size (Square Feet)	Water Demand Factor (Gallons/Square Feet/Day) ¹	Developer Meter Use (Gallons/Day) ²	PUD Water Use (Gallons/Day)
Existing Buildings to Be Demolished					
Behavioral Health Unit	Medical Office	64,341	--	--	--
Hospital Building	Hospital	507,580	--	--	--
500 Washington Street	Medical Office	75,420	--	--	--
Mercy Manor	"Office"	16,668	--	--	--
Emergency Department Building	Hospital	13,796	--	--	--
TOTAL		677,805	--	120,815	--
Proposed Additions					
Hospital Building	Medical Office	67,000	0.039	--	2,613
Hospital I	Hospital	631,000	0.092	--	58,052
Hospital II	Hospital	380,000	0.092	--	34,960
Medical Office Building	Medical Office	200,000	0.039	--	7,800
TOTAL		1,278,000			103,656
Net WSA Demand					0
<p>¹For non-residential demands, PUD is using demands factors from the 2020 URMP and detailed in the CDM 2020 Demand Forecast Report, Table 3. These demand factors include landscaping water demands.</p> <p>²The monthly meter records from April 2017 through March 2022 were provided to PUD or the five meters that will be removed due to demolition of the existing buildings, per developer.</p>					

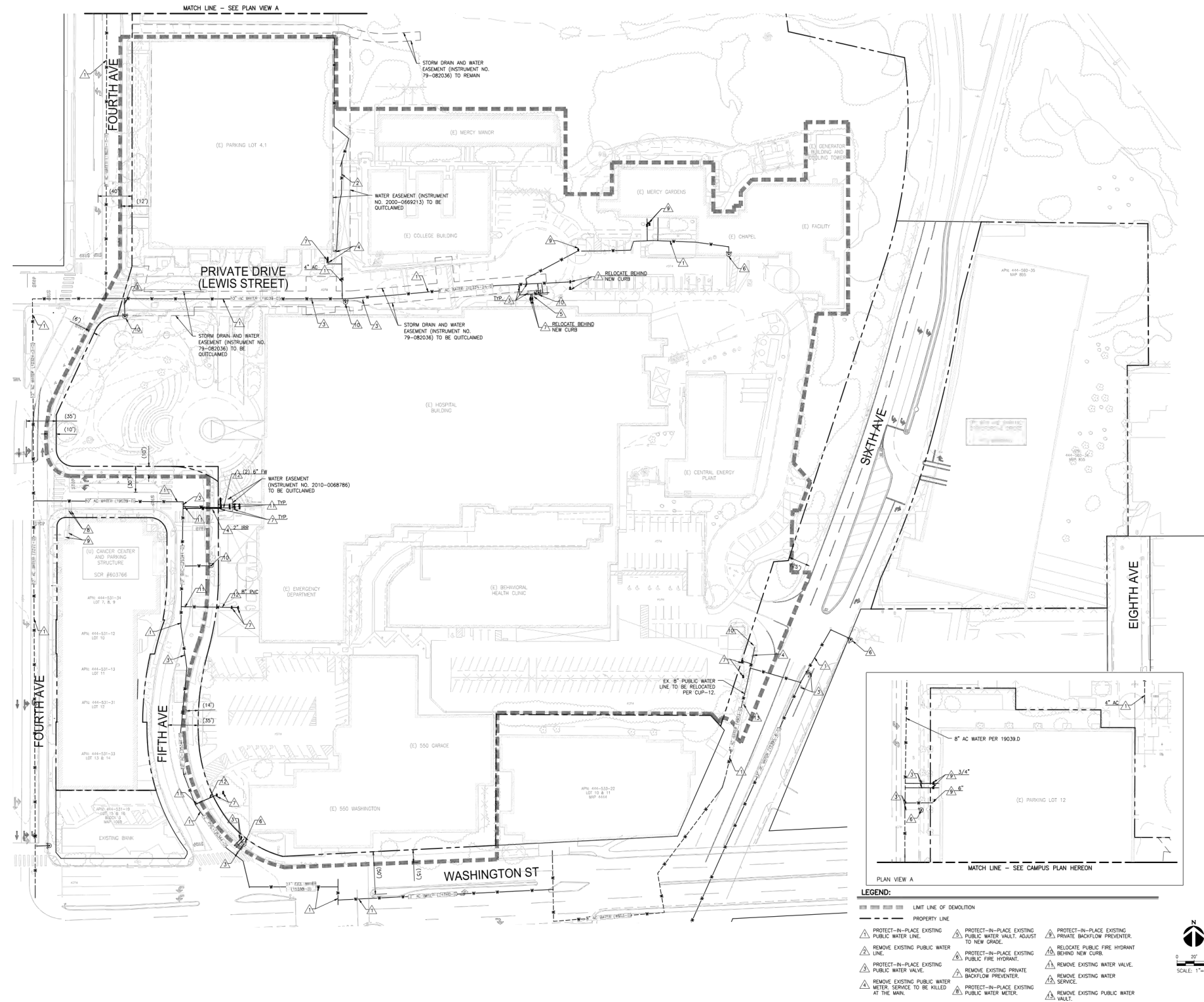


Figure 5.9-1. Existing Water Utilities

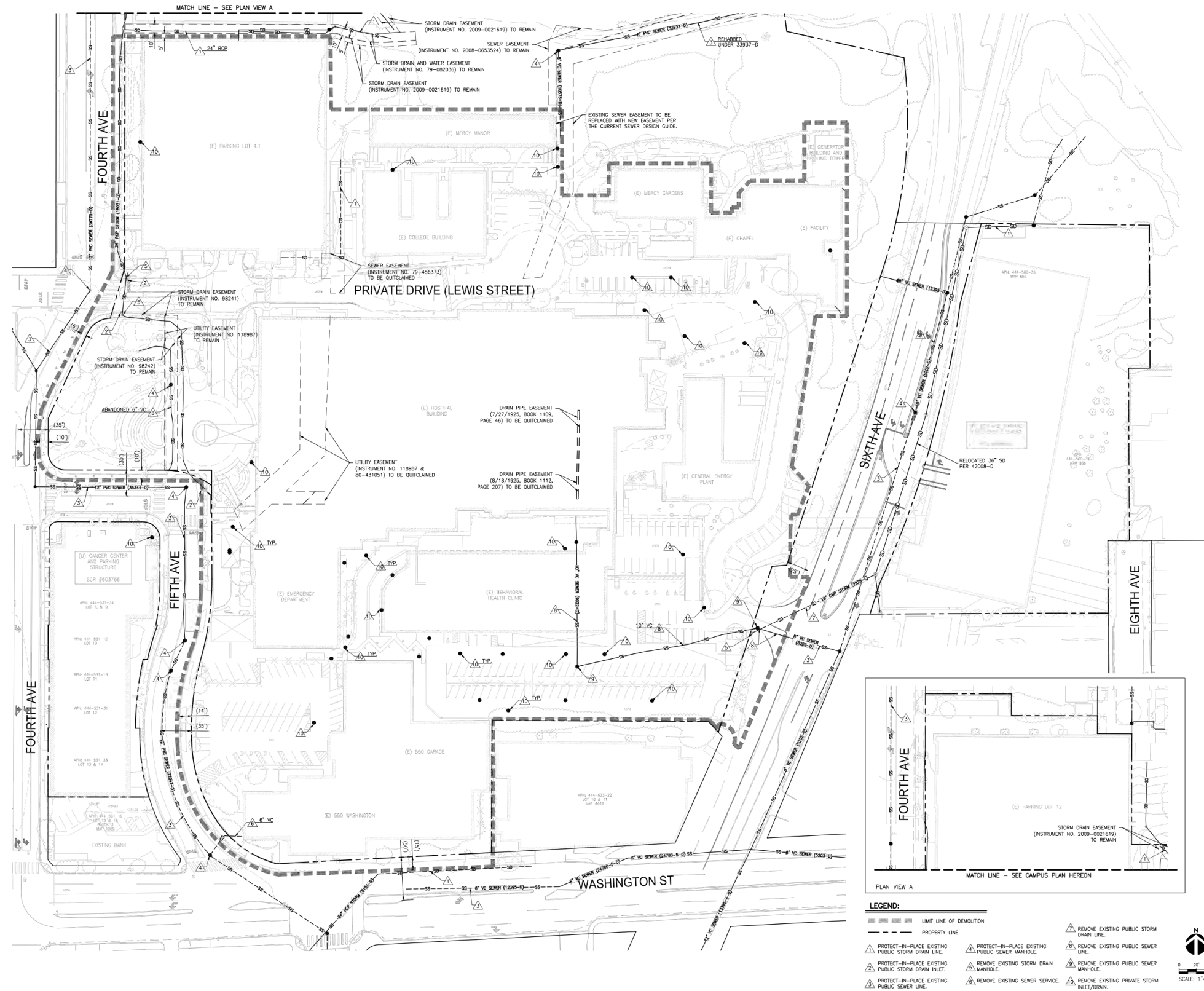


Figure 5.9-2. Existing Sewer Utilities

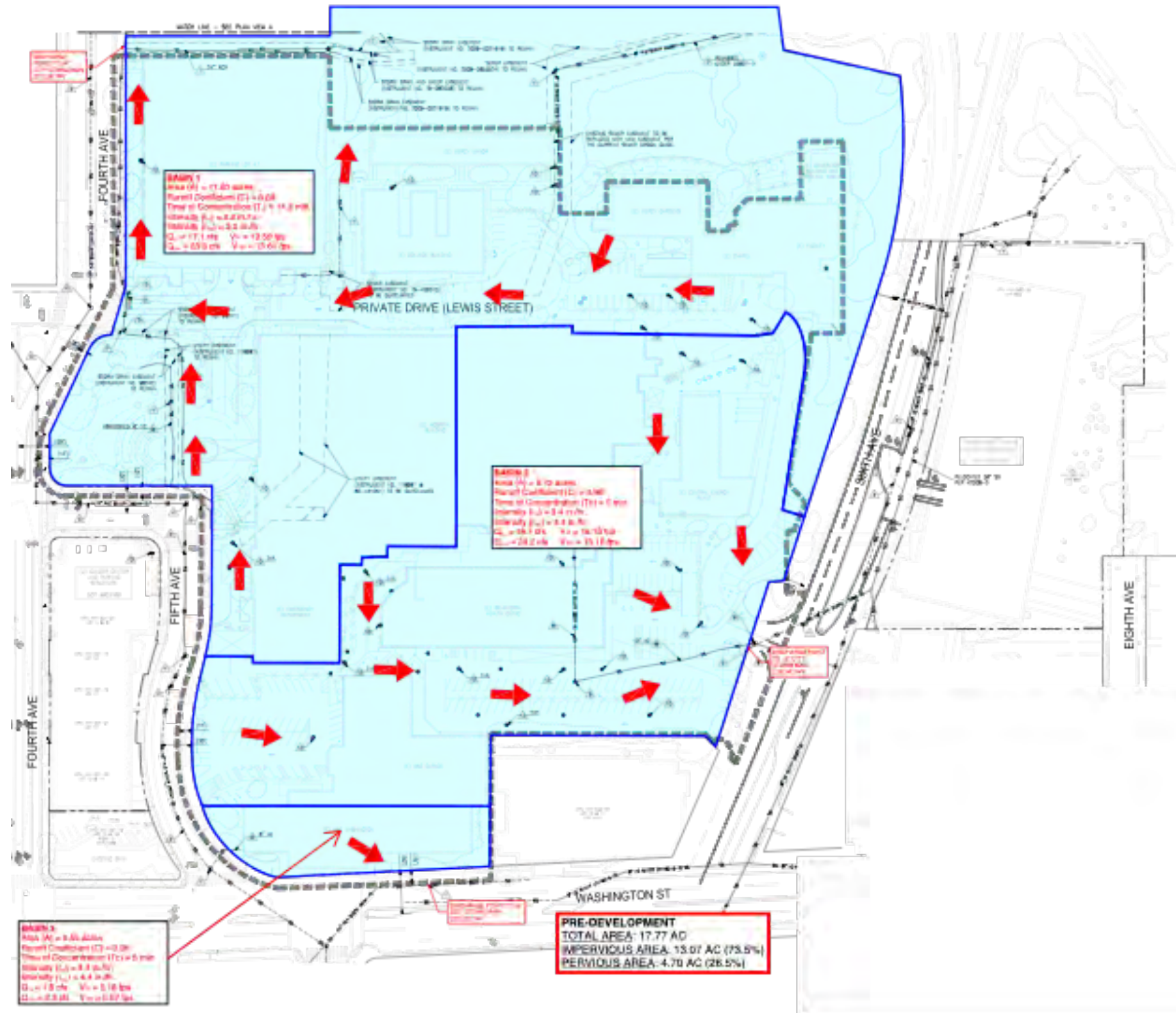


Figure 5.9-3. Existing Drainage

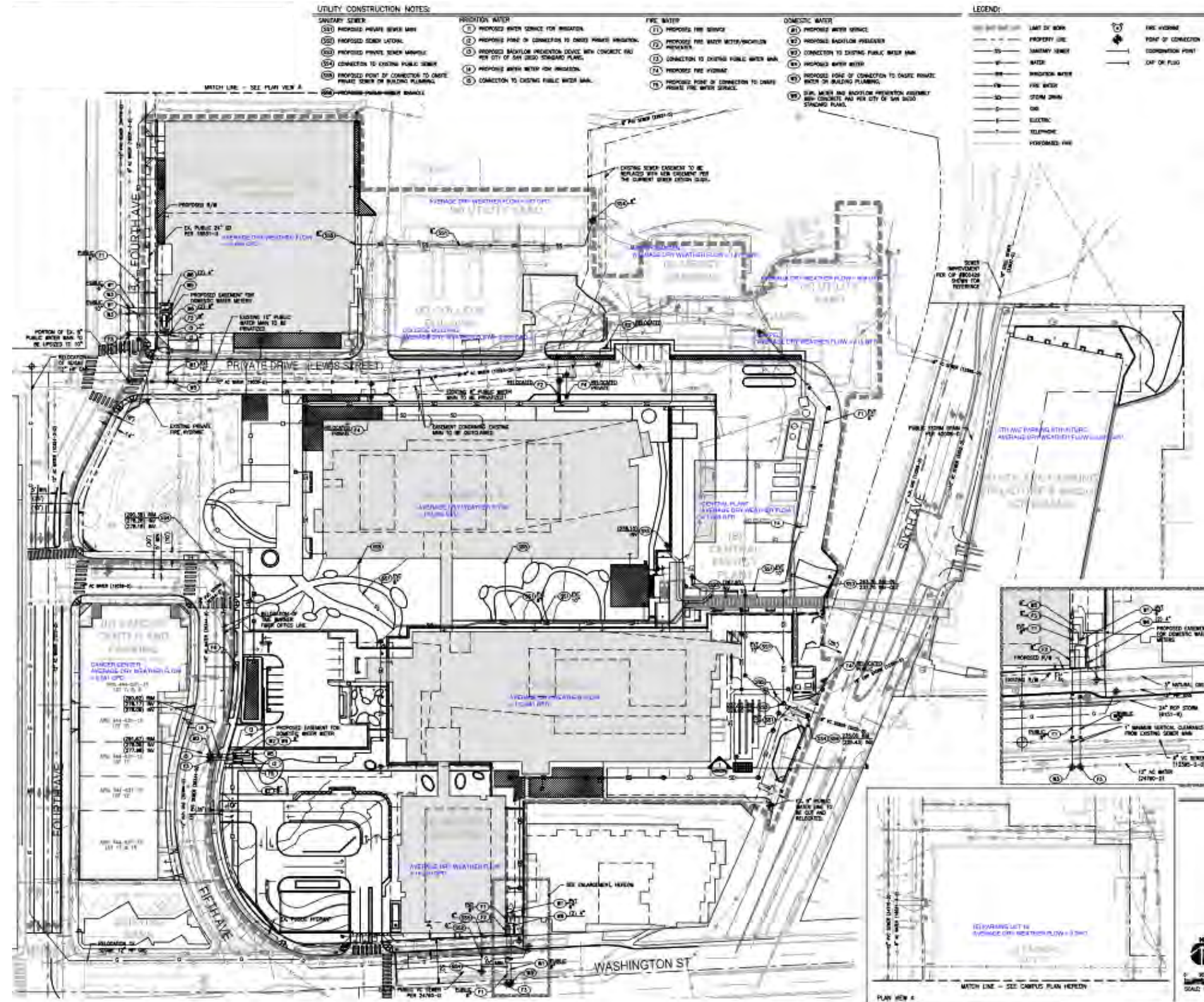


Figure 5.9-4. Proposed Water System Modifications

6.0 CUMULATIVE EFFECTS

Section 15355 of the State CEQA Guidelines defines “cumulative impacts” as two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts. These individual effects may be changes resulting from a single project or a number of separate projects and can result from individually minor but collectively significant projects taking place over a period of time.

The CEQA Guidelines Section 15130 provides guidance for analyzing cumulative impacts and requires that an EIR address cumulative impacts of a project when the project’s incremental effect would be cumulatively considerable. Cumulatively considerable, as defined in Section 15065(a)(3), means that the incremental effects of the individual project are considerable when viewed in connection with the effects of past projects, other current projects and the effects of probable future projects. Where a lead agency determines the project’s incremental effect would not be cumulatively considerable, a brief description of the basis for such a conclusion must be included. In addition, the CEQA Guidelines allow for a project’s contribution to be rendered less than cumulatively considerable with implementation of appropriate mitigation.

According to Section 15130(b) of the CEQA Guidelines, the discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided for the effects attributable to the project alone. The discussion should be guided by the standards of practicality and reasonableness, and should focus on the cumulative impact to which the identified other projects contribute rather than the attributes of other projects which do not contribute to the cumulative impact. The evaluation of cumulative impacts is to be based on either:

- A list of past, present and probable future projects producing related or cumulative impacts including, if necessary, those projects outside the control of the agency; or
- A summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated region- or area-wide conditions contributing to the impacts, including, if necessary, those projects outside the control of the agency; or cumulative impact. Any such planning document shall be referenced and made available to the public at a location specified by the lead agency.

This EIR utilizes the “Plan” approach for the project’s cumulative analysis in accordance with CEQA Section 15130(b). CEQA Section 15130(e) identifies If a cumulative impact was adequately addressed in a prior EIR for a community plan, zoning action, or general plan, and the project is consistent with that plan or action, then an EIR for such a project should not further analyze that cumulative impact, as provided in Section 15183(j). According to CEQA Section 15152(f)(3), adequately addressed means mitigated or avoided by the prior EIR, or examined in detail sufficient to allow impacts to be

mitigated or avoided by site specific project conditions. CEQA also provides that cumulative impacts caused by other projects do not necessarily mean the project undergoing environmental review has its own cumulative impacts. CEQA Guidelines Sections 15130 (d) and (e), 15064(h), and 15152(f)(3).

The Uptown CPU Program EIR adequately addressed cumulative impacts resulting from buildout of the Uptown Community Plan for the environmental resource areas addressed in the Uptown CPU Program EIR. The City CEQA findings for the Uptown CPU Program EIR found cumulatively considerable impacts for the following resource issue areas: (1) transportation (traffic circulation – roadway segments, intersections, and freeway facilities) (2) historical resources, and (3) paleontological resources (due to grading from ministerial projects).¹

Consistent with CEQA Guidelines 15130(d), this section summarizes and incorporates by reference for purposes of tiering from the Uptown CPU Program EIR cumulative effects analysis that adequately addresses each resource issue area. It analyzes the site-specific project-level cumulative impacts from the project without assuming that the project's cumulative impacts are the same as the two cumulatively considerable and unmitigated impacts identified the Uptown CPU Program EIR. In doing so, this analysis identifies whether the City's CEQA findings for why the Uptown CPU Program EIR found cumulatively considerable and unmitigable impacts are applicable to the project, and whether there are alternatives available to avoid those cumulatively considerable impacts that are applicable to the project.

6.1 Plans Considered for Cumulative Effects Analysis

The Uptown Community Plan is utilized in this cumulative effects analysis. The Uptown Community Plan provides a long-range guide for the future physical development of the community. The project site contains developed and undeveloped portions. The Uptown Community Plan designates the developed portion of the site as Institutional and Community Commercial: 0-109 Du/Ac. The undeveloped vegetated slopes within the project site are designated as Open Space. The project proposes no redevelopment in the Open Space-designated portions of the site. As demonstrated in Section 5.1, *Land Use*, the project is consistent with the Uptown Community Plan.

The cumulative impacts assessment in the Uptown CPU Program EIR primarily relied on the cumulative impact determinations in the City's General Plan Program EIR. Consistent with CEQA Guidelines Section 15130(e), where the significance of cumulative impacts was previously identified for the General Plan Program Environmental Impact Report (PEIR), and the CPU is consistent, those impacts do not need to be analyzed further. The Uptown CPU Program EIR determined that build-out of the Community Plan would add incremental effects to several of the issues evaluated in the General Plan Program EIR; however, the effects associated with the CPU would also be cumulatively

¹ Subsequent to certification of the Uptown CPU Program EIR, the City modified the Municipal Code and added Section 142.0157 to require paleontological monitoring when certain conditions are met, which would apply to all projects that involve grading, including ministerial projects. In so doing, the SDMC effectively avoids the potential for significant paleontological cumulative effects.

significant. Issue areas identified as cumulatively significant in the Uptown CPU Program EIR include: transportation (traffic circulation – roadway segments, intersections, and freeway facilities) and historical resources.

The Uptown CPU Program EIR analyzed biological resources, geologic conditions, and health and safety within Chapter 5.0 as environmental issue areas. These issue areas have been included in this EIR in Chapter 7.0, *Effects Found Not to be Significant*, and are, therefore, not included within this cumulative effects analysis. As determined in Chapter 7.0, the project does not have the potential to result in significant impacts to these issue areas.

6.2 Cumulative Effects Analysis

The following discussion provides an analysis of the project's potential cumulative effects and identifies those issue areas that have been excluded from discussion of cumulative effects, because those issue areas were adequately addressed in the Uptown CPU Program EIR.

6.2.1 Land Use

Land uses and development patterns are typically established in local land use planning documents specific to jurisdictions, but can have implications on surrounding areas. Therefore, the geographic scope for the land use cumulative analysis is generally the Uptown Community Plan area. Development on the project site area is governed by the Uptown Community Plan, a component of the City's General Plan, and the LDC. Additionally, the project site is regulated by the San Diego Forward; the Regional Plan, SDIA ALUCP, and is within the CPIOZ A for the Uptown Community Plan. For a detailed discussion and analysis of all these plans, refer to Section 5.1, *Land Use*.

6.2.1.1 Uptown Community Plan

The Uptown CPU contains nine core elements providing community-specific goals and policies that are consistent with Citywide zoning classifications, development design guidelines, mobility guidelines, and programs in accordance with the goals of the City's General Plan and the implementing regulations of the City's LDC. The Uptown CPU would accommodate existing development as well as encourage development consistent with community goals and character. The Uptown CPU is consistent with and also implements the environmental goals or objectives of the SANDAG's San Diego Forward: the Regional Plan. The CPU is consistent with the City's Multiple Species Conservation Program. Development implemented in accordance with the Uptown CPU would not result in conflicts with the City's Environmentally Sensitive Lands (ESL) Regulations, which contains policies supporting the goals of these regulations. Any development within the CPU areas that would encroach into ESL would be subject to review in accordance with the ESL Regulations (LDC, Section 143.0101 et seq.). Future development projects within the Airport Influence Area would be submitted to the Airport Authority, acting as the Airport Land Use Commission, to ensure the consistency of future development with the ALUCP for the San Diego International Airport, until

the Airport Land Use Commission determines the updated CPU and development regulations consistent with the ALUCP. Based on the compatibility of the proposed with the General Plan policy framework and other applicable land use plans and regulations, cumulative land use compatibility, impacts associated with build-out of the Uptown CPU would be less than significant.

6.2.1.2 Scripps Mercy Hospital Campus Project

As presented in Section 5.1, *Land Use*, of the EIR, the project is consistent with all applicable goals, policies, and objectives of the General Plan (except for the Noise Element), the Uptown Community Plan, and the LDC. As evaluated in Section 5.1, *Land Use*, and Section 5.6, *Noise*, the project would result in significant impacts associated with operational (vehicular) noise. There is no standard procedure to ensure that exterior noise affecting existing NSLUs due to traffic noise on a segment of Fourth Avenue between Montecito Way and Lewis Street is sufficiently attenuated to meet City standards. Therefore, there are no feasible mitigation measures to reduce this traffic noise level to a less than significant impact. Operational noise impacts would remain significant and unavoidable, and the project would result in a cumulatively considerable impact on noise.

The project would not result in a significant cumulative impact due to inconsistency or conflict with any other element of the General Plan and would be consistent with the land use designation and all other applicable policies. The project would not result in conflicts to the SDIA ALUCP. The project, when taken into account with other cumulative projects, would not result in a cumulatively considerable contribution to a land use compatibility impact.

6.2.2 Transportation and Circulation

Since the time of adoption of the General Plan and the update of the Uptown Community Plan, evaluation of transportation and circulation environmental effects have changed from a LOS-based discussion to one based on VMT, in accordance with SB 743. A VMT analysis, like that prepared for the project as part of the TIA and addressed in Section 5.2, *Transportation and Circulation*, is by nature a cumulative issue. The State of California OPR determined that: A project that falls below an efficiency-based threshold that is aligned with long-term environmental goals and relevant plans would have no cumulative impact distinct from the project impact. Accordingly, a finding of a less-than-significant project impact would imply a less than significant cumulative impact, and vice versa.

Due to the fact that VMT analysis measures the VMT efficiency of a project compared to the average VMT efficiency of the region covered by SANDAG, the geographic scope for the transportation cumulative analysis is the San Diego Region. A Local Mobility Assessment, separate from the CEQA analysis, analyzes a project's consistency with the applicable Community Plan and determines transportation improvements to be provided as the project builds out. The geographic scope of the Local Mobility Assessment is the Uptown Community Plan area.

6.2.2.1 Uptown Community Plan

The Community Plan allows for increased density in transit priority areas and a complementary mix of land uses that puts origins and destinations closer together and links them with a more complete active-transportation network, thus reducing the distances travelled and the need to travel by car. Nonetheless, as concluded in the Uptown CPU Program EIR, build-out of the Community Plan would result in cumulatively significant impacts to roadway segments, intersections, freeway segments, and freeway ramp meters under the CPU.

6.2.2.2 Scripps Mercy Hospital Campus

The project would be consistent with the Mobility Element of the General Plan and other adopted policies, plans (including the Uptown Community Plan), and programs supporting the transportation system, including pedestrian, bicycle, and transit facilities. The project design includes improvements that would enhance existing bicycle and pedestrian transportation modes on and around the site and facilitate access to and use of public transit. As a result, the project would be consistent with the City's alternative transportation policies. As no policy conflicts have been identified, cumulative impacts related to transportation policy would be less than significant.

The project is located within Census Tract 4 (Series 14, Year 2016 ABM2+) that has a VMT that is approximately 91.5 percent of the regional average. Therefore, because the project site's Employee VMT per Employee is greater than 15 percent below the regional average employee VMT per Employee, the project does not screen out from a VMT analysis. With implementation of TDM reduction measures, the project would mitigate its impacts to below a level of significance in Phase I. According to the VMT analysis, the project at buildout (Year 2035) is calculated to have an Employee VMT per Employee that is 65 percent of the regional average, which is below the regional threshold of 85 percent of regional average. Therefore, the project would not result in VMT exceeding thresholds identified in the TSM and cumulative VMT impact associated with the project would be less than significant.

Cumulative impacts associated with increased hazards due to design features and emergency access would be less than significant as the proposed project would include improvement to facilitate the movement of motorists, bicyclists, and pedestrians within the site and would provide connections to the surrounding areas. All transportation facilities would be designed in accordance with applicable City standards, satisfactory to the City Engineer. The project does not propose non-standard design features and is not expected to increase traffic hazards to motor vehicles, bicyclists, or pedestrians. Impacts would be less than significant. The project would not result in a cumulatively considerable impact; therefore, cumulative impacts would be less than significant.

6.2.3 Visual Effects and Neighborhood Character

The geographic scope for the visual effects and neighborhood character cumulative analysis is the Uptown Community Plan area which includes Hillcrest, Mission Hills, Bankers Hill/Park West, University Heights, Middletown, and the Medical Complex.

6.2.3.1 Uptown Community Plan

In its analysis of visual quality and neighborhood character, the Uptown CPU Program EIR concludes that the CPU would not result in a cumulatively significant impact relative to visual quality and neighborhood character, because the Community Plan area is already urbanized and includes existing development of the type that would be further developed under the CPU. The CPU includes policies to ensure that any new development is consistent with the existing character and protects public views. The policies address consistency in setbacks, height and bulk, landscaping, design, historic character, and natural features such as canyons and hillsides. Compliance with the Land LDC) would ensure that cumulative light and glare impacts are avoided.

6.2.3.2 Scripps Mercy Hospital Campus

As discussed in Section 5.3, *Visual Effects and Neighborhood Character*, the project would redevelop portions of the project site. The project would not result in substantial alteration to the existing or planned character of the area. The project would not contrast with existing surrounding development through excessive height or bulk. The project's bulk, scale, and materials would be compatible with the surrounding development. The project would not strongly contrast with the surrounding development or natural topography. Based on the existing urbanized character of the CPU area, implementation of regulations and policies contained in the CPU and the LDC would ensure that cumulative impacts would be less than significant. Implementation of the project and build-out of the Uptown community would continue to contribute to the sense of an urban community for this area of the City. Cumulatively significant impacts to visual quality and neighborhood character would not occur.

6.2.4 Air Quality

In general, the SDAB is used as the geographic scope for evaluating cumulative air quality impacts. It is appropriate to consider the entire air basin as air emissions can travel substantial distances and are not confined by jurisdictional boundaries; rather, they are influenced by large-scale climatic and topographical features. While some air quality emissions can be localized, such as a CO hotspots or odor, the overall consideration of cumulative air quality is typically more regional.

6.2.4.1 Uptown Community Plan

Construction Emissions

The Uptown CPU Program EIR determined that the exact number, timing and size of individual development projects that could occur per the CPU were not knowable at the time the CPU's Program EIR was certified. The CPU Program EIR acknowledged that if several worst case hypothetical projects were to occur simultaneously, there is the potential to exceed significance thresholds. However, in order for exceedance of construction emissions thresholds to occur, more than one large scale project would have to be occurring within close proximity to one another with overlapping construction schedules. While unlikely to occur based on the fact that the Uptown CPU area is largely built out, future environmental review for these larger projects would allow for a site-specific analysis of construction level air quality emissions to ensure projects are appropriately phased and timed to avoid such cumulative construction emissions. Thus, with implementation of the existing regulatory framework, cumulative construction emissions would be less than significant.

Operational Air Emissions

The Uptown CPU Program EIR concluded that cumulative operational emissions associated with buildout of the CPU would be less than significant. For the Uptown CPU Program EIR consistency with the RAQS was considered the applicable threshold since the City's project specific air quality impact screening levels would not be applicable to a community wide plan update. Build-out of the Uptown CPU area would result in emissions below what was used in the assumptions used to develop the RAQS; thus, overall build-out of the Uptown CPU area would not result in operational emission impacts. Since the RAQS are established for the SDAB which is the cumulative study area for air quality emissions, build-out of the land uses within the Uptown CPU area would not have the potential to result in a significant cumulative impact. Thus, cumulative operational emissions associated with build-out of the proposed Uptown CPU and associated discretionary actions would be less than significant.

Odors

Implementation of the Uptown CPU would not result in a significant cumulative odor impact because the CPU and associated discretionary actions would result in single-family residential, multi-family residential, commercial, and park and open space land uses. These uses are not associated with generation of substantial odors. Additionally, odors are typically confined to the immediate area surrounding their source and thus, individual odor sources would not combine to produce a cumulative impact. Thus, objectionable odors affecting a substantial number of people within the City would not result, and cumulative odor impacts would be less than significant.

Sensitive Receptors

CO Hot Spots

The CO hot spot analysis for the uptown CPU Program EIR evaluated three intersections in the Uptown CPU area. The hot spot analysis indicated that the increases of CO due to the implementation of the CPU would be below the federal and state 1-hour and 8-hour standards. Since CO hot spots are a localized phenomenon, development within other community plans would not contribute to a cumulative CO hot spot impact.

Toxic Air Emissions

The San Diego APCD would require an emissions inventory and health risk assessment in accordance with Assembly Bill 2588 prior to issuance of any permits to construct or operate a stationary emission source. These requirements would extend to land uses within the Uptown CPU area in addition to land uses within the SDAB as a whole. Site specific evaluation of health risks associated with stationary sources cannot be conducted at this level of review, as the project does not include specific development proposals. Nevertheless, existing regulations would ensure that cumulative impacts associated with stationary sources of toxic air emissions would be less than significant as build-out of the plan occurs.

The Uptown CPU Program EIR found that the carcinogenic risks associated with diesel-fueled vehicles operating on local freeways would be less than ten in a million within the Uptown CPU area and the non-carcinogenic risks from PM₁₀ are measured to have a maximum chronic hazard index below the significance threshold of one. Development of cumulative projects within the SDAB would not exacerbate health effects since the evaluation is location specific considering exposure to contaminants at a specific location. Therefore, the cumulative carcinogenic and non-carcinogenic toxic air emissions from exposure of residents to diesel particulate matter emissions would be less than significant.

6.2.4.2 Scripps Mercy Hospital Campus

Construction Emissions

The project and the other development projects in the SDAB would contribute particulates and the ozone precursors VOC and NO_x to the area during the same (short-term) period of construction. As described in Section 5.4, *Air Quality*, project emissions during construction would exceed the SDAPCD regional construction emission thresholds for daily emissions for NO_x. However, the project maximum daily construction NO_x emissions for Hospital I and II were conservatively modeled under a combined construction component from 2024 through 2028. Construction of Hospital II is scheduled to be at the end of the project and most likely would be constructed from 2034 to 2038. By adjusting the allocation of emissions to be associated with separate construction components for Hospital I and II, the daily construction emissions would be reduced by approximately 26 percent in 2024. Therefore, the estimated maximum NO_x emissions for all periods would be below the screening threshold and additional mitigation for NO_x emissions would not be required.

Construction impacts to air quality as a result of project construction would be less than significant and therefore, the project would not have a cumulatively considerable impact to air quality from construction emissions.

Operational Air Emissions

For the project, operational air quality impacts were found not to be significant, as presented in Section 5.4, *Air Quality*. Project emissions would not exceed the SDAPCD thresholds for ROG, NO_x, CO, SO_x, or PM_{2.5} or PM₁₀. Cumulative air quality impacts related to operational emissions would be less than significant.

Odors

Construction activities from the project would be temporary and are not considered significant. Furthermore, any odors emitted during construction would be short-term, and intermittent in nature, and would cease upon the completion of the respective phase of construction. Thus, the project would not create objectionable odors affecting a substantial number of people during construction, and impacts would be less than significant. The project does not include industrial or agricultural uses that are typically associated with objectionable odors. Furthermore, the project would be required to comply with SDAPCD Rule 51, which prohibits the discharge of odorous emissions that would create a public nuisance. Therefore, impacts associated with objectionable odors would be less than significant. The project would not result in significant cumulative impacts associated with odors.

Sensitive Receptors

CO Hot Spots

The Local Mobility Analysis (LMA) prepared for the project indicated that the project-related traffic would not worsen the LOS at intersections operating at LOS E or F. In addition, traffic improvements would be made to allow better traffic flow. Therefore, the project is anticipated to have a less than significant transportation impact. As such, receptors would not be exposed to additional pollutant concentrations related to CO hotspots. No further evaluation with respect to CO hotspots is required. The project would result in a less than significant impact relative to CO hotspots.

Toxic Air Emissions

The City's Thresholds requires a project applicant to assess whether the project will expose sensitive receptors to substantial pollutant concentrations. The HRA evaluates potential risk to residence locations near the project site. Receptors were placed at ten of the closest off-site residential locations (such as the Warwick apartments and the house on Bathhouse Row) and at three of the closest off-site sensitive receptor locations (Select Specialty Hospital, Florence Elementary School, and Green Beans Daycare Center). The noncancer chronic and acute risks due to construction of the project are below the SDAPCD CEQA thresholds. The cancer risk, however, exceeds the SDAPCD CEQA thresholds, which is considered a significant impact. With the implementation of mitigation

measure MM 5.4-1, the cancer risk impacts are below the SDAPCD CEQA threshold. Therefore, implementation of mitigation measure MM 5.4-1 would reduce cancer risk impacts from DPM to below the level of significance.

The project would not result in cumulative impacts associated with air quality.

6.2.5 Historical Resources

For historical resources, the geographic scope is the Uptown Community Plan area, given its importance for both archaeological and historic resources, as well as the greater San Diego region based on the cultural richness and significance of cultural resources in this area. Cumulative impacts to historical resources are expected to be limited by the fact that the project, as well as cumulative projects, will be required to comply with City and County mitigation measures (i.e., archaeology and historical resources monitoring and data recovery programs) applied to projects which could impact significant historical resources. These mitigation measures require information associated with these sites to be recorded before impacts may occur.

6.2.5.1 Uptown Community Plan

The Uptown CPU Program EIR determined individual future projects may contribute to incremental historical and cultural impacts. Even with the implementation of the City's Historic Resource Regulations to mitigate project impacts to such resources, the CPU Program EIR concluded there was no guarantee of ensuring the successful preservation of all historic or cultural resources, because it was possible that the area of a future project within a designated low sensitivity area could still contain a historic or cultural. Therefore, at the program level of analysis conducted for the CPU Program EIR, the City concluded that the cumulative impact on historical and cultural would be considered significant and unmitigated.

6.2.5.2 Scripps Mercy Hospital Campus

As stated in Section 5.5, *Historical Resources*, an HRRR was prepared for structures that would be affected by the project and could have historic value. As concluded in the HRRR, the project site does not contain any structures that would be adversely affected by the project as historical resources for the purposes of CEQA compliance. Furthermore, no existing religious or sacred uses are located on the project site, and the project is not located within a high sensitivity level for archaeological resources. Therefore, the reason why the CPU Program EIR concluded impacts would remain significant and unmitigated are not applicable to the project, as the project would not result in significant cumulative impacts to historical resources.

6.2.6 Noise

Generally, noise impacts are limited to the area directly surrounding the noise generator, as noise attenuates with distance and only has the potential to combine with other noise sources in the immediate vicinity. Therefore, the geographic scope for cumulative impacts relative to noise areas immediately surrounding the project site and Uptown Community Plan area roadways that would be used by project vehicles.

6.2.6.1 Uptown Community Plan

The Uptown CPU Program EIR concluded that noise impacts associated with build-out of neighboring CPUs would be localized in nature. For example, construction of restaurants or commercial uses in North Park or Golden Hill would not affect residences in Uptown with the exception of development that may occur at the boundary of the CPU areas. However, build-out of land uses within each CPU area would be subject to the same General Plan policies, noise ordinance requirements, and Title 24 standards discussed in this document. Thus, cumulative noise impacts would be less than significant.

6.2.6.2 Scripps Mercy Hospital Campus

Construction

As stated in Section 5.6, *Noise*, noise levels from project construction to off-site sensitive receptors would exceed the limits defined in the City Noise Ordinance during most phases of construction. Mitigation measure 5.6-1 would be implemented to reduce significant construction noise impacts to below a level of significance. Implementation of MM 5.6-1 would avoid the potential for cumulative impacts associated with construction. Furthermore, given the rapid attenuation of noise with distance, it would be too speculative to conclude that construction noise generated by the project would combine with the construction of other projects in the vicinity to generate a significant impact above the City's construction noise standards. Project construction noise and vibration impacts would therefore not be cumulatively considerable.

Operational

As evaluated in As evaluated in Section 5.1, *Land Use*, and Section 5.6, *Noise*, the project would result in significant impacts associated with operational (vehicular) noise. There is no standard procedure to ensure that exterior noise affecting existing NSLUs is sufficiently attenuated to meet City standards. Therefore, there are no feasible mitigation measures to reduce this traffic noise level to a less than significant impact. Impacts related to traffic noise at Fourth Avenue would remain significant and unmitigable.

Operational noise impacts are significant and unavoidable and the project would result in a cumulatively considerable impact on noise.

6.2.7 Greenhouse Gas Emissions

The geographic scope of consideration for GHG emissions is global, and as such emissions contribute, on a cumulative basis, to global climate change. By nature, GHG impacts are cumulative as they are the result of combined worldwide emissions over many years, and additional development would incrementally contribute to this cumulative impact. The discussion presented in Section 5.7, *Greenhouse Gas Emissions*, also serves as the project's cumulative impact analysis.

6.2.7.1 Uptown Community Plan

As concluded in the Uptown CPU Program EIR, the analysis of GHG emissions a cumulative analysis by nature, because GHG emissions are caused by global GHG emissions, not individual projects. The CPU Program EIR concludes that implementation of the Uptown Community Plan would not result in a cumulatively considerable contribution to GHG emission impacts and have been adequately addressed.

6.2.7.2 Scripps Mercy Hospital

As discussed in Section 5.1, *Land Use*, and demonstrated in Section 5.7, *Greenhouse Gas Emissions*, the project completed a CAP Conformance Evaluation, which determined that the project would be consistent with the CAP. Based on the project's consistency with the CAP Consistency Checklist strategies, the project's contribution of GHG emissions to cumulative Statewide emissions would be less than cumulatively considerable.

6.2.8 Public Services and Facilities

Public services and facilities generally serve residents on a community-wide basis. Thus, the geographic scope for analysis of public services and facilities is the Uptown Community Plan area.

6.2.8.1 Uptown Community Plan

The Uptown CPU Program EIR found that, some of the City's existing built areas have existing infrastructure deficiencies and would require capacity improvements to serve additional population.

Therefore, it is anticipated that new or improved public services and facilities infrastructure would be required to meet the needs of the City's future growth occurring through infill and redevelopment as well as remaining on vacant and developable lands. However, implementation of the proposed Uptown CPU and associated discretionary actions do not include construction of any specific public facilities or services. The proposed Uptown CPU includes policies that would support improvements to public facilities and includes a proposed Impact Fee Study that would specify the DIF applicable to future development within the CPU area.

The specific public facilities improvements that would be constructed in the cumulative area of Uptown, North Park, and Golden Hill and the degree of future impacts and applicability, feasibility, and success of future mitigation measures cannot be adequately known at this program level of analysis. However, each future facility improvement would undergo a separate environmental review and is not intended to be analyzed for purposes of this proposed Uptown CPU. Thus, cumulative impacts related to public facilities would be less than significant.

6.2.8.2 Scripps Mercy Hospital Campus

Cumulative impacts to public facilities are also addressed by community wide Infrastructure Financing Studies (IFS) that identify necessary facility improvements and form the basis for development of Development Impact Fees (DIFs) for public facilities addressed in the study. The project would either pay the DIF to help finance the construction of future public facilities or provide community public facilities on-site that meet or exceed the value of the DIF. The project level analysis performed for the project as presented in Section 5.8, *Public Services and Facilities*, explains that the project would not result in significant impacts to public services and facilities. The project does not generate any new residents or population and therefore would not contribute to the demand for libraries, parks and recreation or school services, which are typically resident-focused. The project does not trigger the need to construct a new police, fire, or EMS facility in order to meet response times. Therefore, the project would not have a cumulatively considerable impact on public facilities.

6.2.9 Public Utilities

Public utilities involve services that serve the San Diego region. More importantly for the project are those public utilities and providers within the City of San Diego. Thus, the geographic scope for the public utilities cumulative analysis is the City.

6.2.9.1 Uptown Community Plan

The Uptown CPU Program EIR found that, the Uptown CPU and discretionary actions would be consistent with the water demand assumptions included in the regional water resource planning documents of the SDCWA and the MWD. Furthermore, current and future water supplies, as well as the actions necessary to develop these supplies, have been identified in the water resources planning documents of the PUD, the SDCWA, and MWD to serve the projected demands of the proposed Uptown CPU area, in addition to existing and planned future water demand of the City. Additionally, the proposed Uptown CPU contains policies intended to ensure that no excessive water use takes place, encourage water conservation and reclamation, and ensure the continued operability of existing infrastructure. Thus, cumulative impacts related to water supply would be less than significant.

Mandatory compliance with City standards for the design, construction, and operation of storm water, water, and wastewater infrastructure (including environmental review) would preclude significant cumulative environmental impacts. As a result, the proposed Uptown CPU and associated discretionary actions would result in a less than significant cumulative impact associated with storm water, water, wastewater, and communication systems.

Future projects within the Uptown CPU area and Citywide, would be required to comply with City regulations regarding solid waste, including those intended to divert solid waste from the Miramar Landfill to preserve capacity. Compliance with the Municipal Code and consistency with the General Plan and applicable Community Plan policies promoting waste diversion would serve to preserve solid waste capacity. Discretionary projects generating more than 60 tons of waste would be required to develop and implement WMPs targeting 75 percent waste diversion. Therefore, cumulative solid waste impacts would be less than significant.

6.2.9.2 Scripps Mercy Hospital Campus

As discussed in Section 5.9, *Public Utilities*, the project would not result in the need to construct or substantially alter public utility systems or infrastructure. Existing off-site infrastructure currently serving the area would be sufficient to serve the project.

The project's water demand has been considered in conjunction with other past, present, and reasonably foreseeable future development in the City through the WSA. This analysis determined that sufficient water supplies would be available to serve the project in conjunction with other development.

The project also would not result in the need for new or altered off-site water systems. The project's water and sewer systems would be designed in conformance with City's standards. The project would implement source control, site design, and treatment-control BMPs that would preclude significant impacts to water quality from storm water runoff. Additionally, the project would comply with associated requirements including the NPDES Construction General, Municipal and Groundwater permits. These requirements have been reviewed by qualified City staff and would be reverified during the ministerial process. Adherence with the standards would preclude considerable degradation to water quality. Therefore, the project would not result in a cumulatively significant impact due to storm water runoff.

All projects in the City of San Diego would be required to comply with the City's Recycling Ordinance and prepare WMPs (for those that meet the 1,000,000-square-foot threshold) to show waste diversion measures as is required by the regional Integrated Waste Management Plan. These requirements are directed at ensuring cumulative impacts associated with solid waste would not be cumulatively significant.

Relative to the project's modifications to SDG&E facilities, the physical construction of electrical and gas facilities has been analyzed as part of the project's proposed construction plans and no impacts would result. Thus, the project impact on public utilities and SDG&E services has been analyzed, are not too speculative, and would not result in significant cumulative effects associated with public utilities.

7.0 EFFECTS FOUND NOT TO BE SIGNIFICANT

Section 15128 of the State CEQA Guidelines requires an EIR briefly describe potential environmental effects of the project that were determined not to be significant and were, therefore, not discussed in detail in the EIR. Based upon initial environmental review, the following issue areas were determined not to have the potential to cause adverse effects, and therefore have not been addressed in detail in the EIR.

7.1 Agricultural Resources and Forestry

Based on the City's Thresholds for impacts to Agricultural Resources and Forestry, a project may result in a significant impact if it would result in:

- The conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (as defined by the State of California on its Important Farmlands Map) to non-agricultural use.
- Conflict with existing zoning for agricultural use, or Williamson Act contract.
- Involve other changes in the existing environment which due to their location or nature, could result in conversion of Farmland, to no-agricultural use.

The project site is the location of the Scripps Mercy Hospital campus, consisting of medical office and hospital buildings, accessory/support buildings, and surface and structured parking. The site does not contain land that is designated as prime agricultural soils by the Soils Conservation Service, nor does it contain prime farmlands designated by the California Department of Conservation. The site is not subject to, nor is it near, a Williamson Act contract site pursuant to Sections 51200-51207 of the California Government Code. The project site and surrounding area are designated as urban and developed land. There is no farmland located in proximity to the project site. Therefore, there would be no impacts associated with agricultural resources.

7.2 Biological Resources

The City's Thresholds state a project could result in significant biological impacts if it would 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 MSCP or other local or regional plans, policies or regulations, or by the California Department of Fish and Game (CDFG) or U.S. Fish and Wildlife Service (USFWS);
- 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, regulations, or by the CDFG or USFWS;

- A substantial adverse impact on wetlands (including, but not limited to, marsh, vernal pool, riparian, etc.) through direct removal, filling, hydrological interruption, or other means;
- Interfering substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, including linkages identified in the MSCP Plan, or impede the use of native wildlife nursery sites;
- A conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or State habitat conservation plan, either within the MSCP plan area or in the surrounding region;
- Introducing land use within an area adjacent to the MHPA that would result in adverse edge effects;
- A conflict with any local policies or ordinances protecting biological resources; or
- An introduction of invasive species of plants into a natural open space area.

There are no sensitive biological resources (MHPA, habitat, or sensitive species) on site. The project is located in an urban area surrounded predominantly by urban uses (residential, commercial, retail, and associated parking). All development would occur within the existing developed area. As such, the project would not impact biological resources and no biological study was required. The project would not: require any adverse habitat modifications; result in any adverse impacts or changes to Tier I, Tier II, Tier IIIA, or Tier IIIB Habitats or wetlands, as none are located on the project site; interfere substantially with the movement of any native resident or migratory fish or wildlife species; conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or State habitat conservation plan, as well as any local policies or ordinances protecting biological resources; or introduce any invasive plant species into a natural open space area. Therefore, impacts relative to biological resources would be less than significant with the implementation of the project.

7.3 Energy

The City of San Diego has not yet prepared thresholds of significance for potential impacts to energy. Therefore, for purposes of this EIR, guidance provided by issue questions listed in CEQA Appendix G are utilized to evaluate the potential for significant impacts to energy:

- Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.

SDG&E, a subsidiary of Sempra Energy, provides natural gas and electricity service to the project site. SDG&E provides electrical services to 3.6 million customers through 1.4 million electric meters and 873,000 natural gas meters through the 4,100-square-mile service area in San Diego County and southern Orange County. SDG&E forecasts future natural gas and power consumption demand on a continual basis, primarily for installation of transmission and distribution lines. In situations where projects with large power loads are planned, this is considered together with other loads in the project vicinity, and electrical substations are upgraded as necessary. Direct impacts to electrical and

natural gas facilities are addressed and managed by SDG&E at the time incoming development projects occur.

The project site is developed with the Scripps Mercy Hospital Campus, encompassing 1,092,455 square feet of hospital, hospital support, medical office uses, and other associated facilities. SDG&E facilities that surround the project site within public streets and also traverse portions of the project site would continue to serve the project as they do today.

7.3.1 Electricity

According to the California Energy Commission's California Energy Consumption Database, California used approximately 279,401 gigawatt hours (2,794 trillion kilowatt hours) of electricity in 2019, which is the most recent year of data available. Electricity usage in California for different land uses varies substantially by the type(s) of uses in a building, type(s) of construction materials used in a building, and the efficiency of all electricity-consuming devices within a building. Due to the State's energy efficiency standards and efficiency and conversion programs, California's per capita electricity use had remained stable for more than 30 years, which the national average has steadily increased.

The State of California produces approximately 82 percent of its electricity and imports the remaining 18 percent. The California Independent System Operator (ISO) governs the transmission of electricity from power plants to utilities. Electricity to San Diego County is transferred via 138 kilo volts (kV) lines at Camp Pendleton, and a 500 kV line near Jacumba. Additionally, there are two operating power plants within San Diego County: Encina (Cabrillo Power) - 965 MW, and the Palomar Energy Power Plant, Escondido (SDG&E) - 550 MW, which began operating in the summer of 2006.

SDG&E receives electric power from a variety of sources. According to the California Public Utilities Commission's 2021 California Renewables Portfolio Standard Program Annual Report, 39 percent of SDG&E's power came from eligible renewable sources in 2020, including biomass/waste, geothermal, small hydroelectric, solar, and wind sources

In addition, a variety of energy conservation programs are provided by SDG&E to City residents and businesses. These programs include:

- Conducting surveys to determine energy use and recommending energy efficiency measures to reduce energy use;
- Providing discounts for retrofitting lighting, refrigeration, and mechanical equipment with energy efficient technologies; and
- Incentives for using energy during non-peak hours to reduce peak-hours demand.

Title 24 of the California Administrative Code sets efficiency standards for new construction, regulating energy consumed for heating, cooling, ventilations, water heating, and lighting. These building efficiency standards are enforced through the City's building permit process.

Construction

Temporary electrical power for as-necessary lighting and electronic equipment, such as computers inside temporary construction trailers, would be provided by SDG&E. The amount of electricity used during construction would be minimal because typical demand stems from the use of several construction trailers that are used by managerial staff during the hours of construction activities in addition to electrically-powered hand tools. Most energy used during construction would be from petroleum. The electricity used for such activities would be temporary and negligible.

Operation

SDG&E has indicated that the current energy system would be sufficient to service the project, and that SDG&E would serve the project. A letter from SDG&E states gas and electric services can be made available for the project (see Appendix G). No adverse effects to non-renewable energy resources are anticipated with development of the project site as proposed by the project. Furthermore, the project would not result in the use of excessive amounts of electricity and would not result in the need to develop additional sources of energy. Electricity use would be commensurate with the proposed use, and would not result in a substantial increase in consumption. Additionally, the project would not cause large amounts of electricity to be used in a manner that is wasteful or otherwise inconsistent with adopted plans or policies. The project would adhere to Title 24 requirements and the CAP and would incorporate several measures directed at minimizing energy use. These include:

- High-efficiency windows and kitchen appliances
- Energy Efficient Air Conditioning and Heating
- 3rd Party Performance Testing and Inspections of Design and Equipment
- Energy Efficient LED Lighting
- Programmable Thermostats
- Electric Vehicle charging stations

7.3.2 Natural Gas

Natural gas sources for the California include in-state sources (16 percent), Canada (28 percent), the Rockies (10 percent), and the Southwest (46 percent). Gas from outside sources enter the state through large high-pressure gas lines. These transmission lines feed natural gas storage areas located in Orange and northern Los Angeles counties, which serve all of southern California. From these storage facilities, high-pressure gas transmission lines enter San Diego County from the north inland area (Rainbow area). A 30-inch transmission line veers to the coast, and a 16-inch line continues inland.

Construction

Natural gas is not anticipated to be required during construction of the project. Fuels used for construction would primarily consist of diesel and gasoline, which are discussed under the “petroleum” subsection, below. Any minor amounts of natural gas that may be consumed as a result of project construction would be temporary and negligible and would not have an adverse effect.

Operation

Natural gas would be directly consumed throughout the operation of the project, primarily through building heating, water heating, and cooking. The project’s long-term increase in demand for natural gas would be commensurate with the proposed use, would not be substantial, and would not cause the use of large amounts of natural gas in a manner that is wasteful or otherwise inconsistent with adopted plans or policies. However, the project would be designed to comply with Title 24, Part 6, of the CCR, as well as the CAP. Natural gas consumption would be appropriate and not place a significant burden on SDG&E’s services. energy consumption relative to electricity and natural gas use would not be considered excessive, inefficient, or unnecessary.

7.3.3 Petroleum

There are more than 27 million registered vehicles in California, and those vehicles consumed an estimated 18.5 billion gallons of petroleum and diesel in 2014, according to the California Energy Commission. Gasoline and other vehicle fuels are commercially provided commodities, and would be available to the project via commercial outlets.

Petroleum accounts for approximately 92 percent of California’s transportation energy sources. Technological advances, market trends, consumer behavior, and government policies could result in significant changes to fuel consumption by type and total. At the Federal and State levels, various policies, rules, and regulations have been enacted to improve vehicle fuel efficiency, promote the development and use of alternative fuels, reduce transportation-source air pollutants and GHG emissions, and reduce VMT. Market forces have driven the price of petroleum products steadily upward, and technological advances have made use of other energy resources or alternative transportation modes increasingly feasible.

Construction

Petroleum would be consumed throughout construction of the project. Fuel consumed by construction equipment would be the primarily energy resource expended over the course of construction, while VMT associated with the transportation of construction materials and construction worker commutes would also result in petroleum consumption. Heavy-duty equipment used for project construction would rely on diesel fuel, as would haul trucks involved in off-hauling materials from demolition and excavation. Construction workers would travel to and from the project site throughout the duration of construction. It is assumed that construction workers would travel to and from the project site in gasoline-powered passenger vehicles. There are no unusual project characteristics or construction processes that would require the use of equipment that

would be more energy intensive than is used for comparable activities or use of equipment that would not conform to current emissions standards (and related fuel efficiencies).

Heavy-duty construction equipment of various types would be used during each phase of construction. Petroleum use is necessary to operate construction equipment, and construction equipment would employ Tier 3 engines or higher (and thus would be newer off-road equipment units). Additionally, energy used during construction of the project would be limited to the construction period, and would not involve long-term petroleum use. As such, energy consumption during construction activities would not be considered excessive, inefficient, or unnecessary. Demand for jobs in the project vicinity demonstrates that the proposed construction would not be considered unnecessary.

Operation

Over the lifetime of the project, the fuel efficiency of vehicles in use is expected to increase, as older vehicles are replaced with newer, more efficient models. Thus, the amount of petroleum consumed as a result of vehicle trips to and from the project site during operation would decrease over time. There are numerous regulations in place that require and/or encourage increased fuel efficiency. For example, CARB has adopted a new approach to passenger vehicles by combining the control for smog-causing pollutants and GHG emissions into a single coordinated package of standards. The new approach also includes efforts to support and accelerate the numbers of plug-in hybrids and zero-emissions vehicles in California. As such, operation of the project is expected to use decreasing amounts of petroleum over time, due to advances in fuel economy.

In summary, although the project would result in an increase in petroleum use during construction and operation compared to the existing conditions, the project would implement measures required under the CAP Checklist regarding VMT reduction through the implementation of a TDM program, as well as provision of a new trolley stop. Additionally, project-specific petroleum use would be expected to diminish over time as fuel efficiency improves and due to the project's walkability and proximity to transit and active transportation networks. Given these considerations, petroleum consumption associated with the project operation would not be considered excessive. The project would increase demand for energy in the project area and SDG&E's service area. However, no adverse effects on non-renewable resources are anticipated. The project would follow UBC and Title 24 requirements for energy efficiency and would incorporate sustainable design features directed at reducing energy consumption. As such, the project would not result in wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation. No significant impacts would result.

7.4 Geologic Conditions

Based on the City's Thresholds for impacts to geology, a project may result in a significant impact if it meets one or more of the following criteria:

- If the project would expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:
 - Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault.
 - Strong seismic ground shaking.
 - Seismic-related ground failure, including liquefaction.
 - Landslides.
- If the project would result in substantial soil erosion or the loss of topsoil.
- If the project is 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.
- If the project would be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property.
- If the project would have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.

Kleinfelder conducted a geotechnical study for the project that consisted of a desktop review of numerous existing geotechnical and geologic hazard investigations along with geologic literature and aerial photographs. The complete Geotechnical Services for Master Plan Update and CUP Amendment Scripps Mercy Hospital dated July 22, 2020 (Revised March 1, 2022), is included in Appendix J to this EIR.

The site is located on a coastal terrace within the Peninsular Range geomorphic province. This province stretches for several hundreds of miles south from the Los Angeles area to the tip of Baja California. The site is underlain by silty and clayey sand fill soils over very dense and variably depth of San Diego Formation that overlay the Pomerado Conglomerate Formation. Static groundwater was not encountered within the depths explored. One exploration location encountered seepage or a localized perched groundwater condition and elevated moisture contents were measured in several samples. Based on the nature of the proposed construction and types of near-surface soils, as well as the observed depth of groundwater, any groundwater problems to development due to the construction of the new site improvements are not expected, provided sound engineering and construction practices are followed.

There are no known active faults crossing the site. The closest active fault to the site is the Rose Canyon Fault, which is located approximately 1.5 miles to the southwest. The site is not within a State of California Alquist-Priolo Earthquake Fault Zone. In addition, published geologic maps do not show any faults crossing through or nearby the site. Finally, review of predevelopment aerial photographs do not show geomorphic features or lineaments indicative of faulting across the site. Based on this information, the geologic hazard with respect to fault rupture is considered low.

Earthquake-induced soil liquefaction can be described as a significant loss of soil strength and stiffness caused by an increase in pore water pressure resulting from cyclic loading during shaking. Liquefaction is most prevalent in loose to medium dense, sandy and gravelly soils below the groundwater table. The potential consequences of liquefaction to engineered structures include loss of bearing capacity, buoyancy forces on underground structures, ground oscillations or “cyclic mobility”, increased lateral earth pressures on retaining walls, post liquefaction settlement, lateral spreading and “flow failures” in slopes. Based on the absence of near-surface groundwater, as well as the presence of dense to very dense formational soils, the potential for liquefaction of the subsurface soils at the site is considered low.

Based on the relatively level ground over most of the campus for proposed structures, setback distances to slopes, presence of very dense formational materials, favorable geologic structure, and proposed construction, the hazard to the proposed improvements by landslides is considered low. The proposed project improvements are located on previously developed relatively level ground surfaces at variable distances to existing slopes. New slopes are not proposed. In addition, the project would comply with City requirements to submit project-specific geotechnical and geologic hazards reports prior to issuance of construction permits and following completion of the grading. Therefore, there would be no impacts relative to geologic conditions with the implementation of the project.

7.5 Health and Safety

The City's Thresholds are used to determine whether the project could have a significant impact on health and safety resources. The significance criteria guidelines discuss three issue areas, Hazardous Materials/Public Safety, Human Health, and Brush Management. A project could result in significant health and safety impacts if it would result in:

- Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or environment;
- Result in potential hazards from construction and operation of the project, including the potential for hazardous material release from routine use or from accident conditions;
- Result in hazardous emissions or handle acutely hazardous materials, substances, or waste within a quarter mile of an existing or proposed school;
- Exposed people to toxic substances, such as pesticides and herbicides, some of which have long-lasting ability;
- Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including when wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands;
- Would impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan;

- Result in a safety hazard for people residing or working in a designated airport influence area or within two miles of a private airstrip or heliport facility that is not covered by an adopted ALUCP;

The project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Although hazardous materials may need to be transported to or from the project site as a result of regular hospital operations, this transport would be in accordance with all applicable laws and regulations so as to avoid the creation of a significant hazard to the public or the environment. Additionally, 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. Compliance with applicable laws and regulations for the transport of hazardous materials would minimize the likelihood of reasonably foreseeable upset and accident conditions involving the release of hazardous materials.

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. Florence Elementary School is located within one-quarter mile of the project site. However, regular hospital operations do not result in the emission or handling of hazardous or acutely hazardous materials, substances, or waste, beyond the regulated transport of these substances to or from the site. An EnviroStor database search was undertaken for the project site. (See Appendix P.) Results of the search yielded that the project site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. As a result, the project would not create a significant hazard to the public or the environment.

The project site is located within an urbanized and developed portion of the City of San Diego. The City of San Diego LDC, Section 142.0412 requires the equivalent of a combined brush management Zone One and Two dimension of 100 feet, measured from the exterior of the structure towards the native/naturalized vegetation. The project incorporates Zone 1 on the north and eastern borders of the project site and Zone two occurs past Zone 1 in these areas. The project would implement ornamental planting areas with irrigation in Zone 1; and Zone 2 would be kept as the existing undisturbed, native or naturalized vegetation. No new planting would occur, and no irrigation would be added to portions of the site located in Zone 3. Brush management zones incorporated into project design features would effectively minimize exposure to wildland fire risk. Project impacts are less than significant.

The project proposes partial redevelopment of the Scripps Mercy Hospital campus. The hospital campus is located within the existing fabric of the community, which is served by existing emergency response services. The project would not substantially alter the existing circulation network surrounding the project site. Construction of the project could require temporary detours and/or lane closures that could temporarily disrupt travel along existing roadways for periods of time within the construction zone. Emergency access to all surrounding properties, however, would be

maintained throughout the construction period. In addition, a traffic control plan and haul route plan would be prepared and implemented as a standard City requirement during project construction. With implementation of these plans, the project would not impede access to publicly or privately-owned land and would not interfere with emergency response during construction. Therefore, no significant public safety impacts related to emergency services would occur during construction.

The project site is located within two miles of SDIA. However, the project site is not within the noise contours identified on the Noise Contour Map (see Figure 5.1-3, *SDIA Noise Contour Map*). The project site is not within the safety zones identified on the Safety Compatibility Zones Map. As such, the project would not result in a safety hazard or excessive noise for people residing or working in the project area. Therefore, there would be no impacts relative to health and safety with the implementation of the project.

7.6 Hydrology

A *Drainage Study for Scripps Mercy Hospital* (Drainage Study) was prepared for the project by KPFF Consulting Engineers (June 2022). The Drainage Study is included as Appendix A to this EIR.

Based on the City's Thresholds, a project could result in a significant impact associated with hydrology if it would:

- Result in increased flooding on- or off-site, that may result in significant impacts on upstream or downstream properties and to environmental resources.
- Impose flood hazards on other properties or development or be proposed to develop wholly or partially within the 100-year floodplain identified on the Federal Emergency Management Agency (FEMA) maps.
- Result in decreased aquifer recharge or result in extraction from an aquifer resulting in a net deficit in the aquifer volume or reduction in the local groundwater table.
- Grade, clear, or grub more than 1.0 acre of land, especially into slopes over a 25 percent grade, and would drain into a sensitive water body or stream, there may be significant impacts on stream hydrology if uncontrolled runoff results in erosion and subsequent sedimentation of downstream water bodies;
- Result in modifications to existing drainage patterns that impact environmental resources such as biological communities and arachnological resources.

The existing site infrastructure includes a college building, parking structures, surface parking lots, medical office buildings, emergency department facilities, and the main hospital building. In the pre-developed condition, the site consists of approximately of 74 percent impervious surface, with no expected off-site drainage. The pre-development condition is divided into three basins per existing grading and site features: Basin 1, Basin 2, and Basin 3.

In the post development condition, the site consists of approximately 67 percent impervious surface; a seven percent reduction in imperviousness when compared to the pre-development conditions. The post development condition is divided into 2 basins per the proposed grading and site features: Basin 1, Basin 2. Basin 1 entails the drainage produced from the existing north parking structure, proposed MOB, west side of Replacement Hospital 2, existing college building, existing Mercy Manor, and surface runoff from Lewis Street. Stormwater from Basin 1 passes through biofiltration planters scattered onsite. Treated stormwater from Basin 1 will discharge to an existing 24-inch RCP public main on Fourth Avenue, ultimately leading to a surface outfall to Mercy Canyon in the northern part of the site. Basin 2 consists of the drainage produced from the proposed Replacement Hospital 1 and 2, HSB and HSB Plaza, and proposed loading dock. Stormwater from Basin 2 passes through biofiltration planter, both traditional and compact form, then discharges via an existing 18-inch RCP storm drain main in Sixth Avenue.

The hydrology calculations are based on the City of San Diego Drainage Design Manual (January 2017). The project site is less than one square mile, and therefore the Rational Method was used to calculate the peak flow rate for the 10-year and 100-year storm events. The Rational Method calculates peak flow rate (Q) as a function of runoff coefficient (C), rainfall intensity (I), and drainage area (A). The proposed development would increase the amount of pervious area and thus reduce the project site peak flow runoff. The peak flow runoff rate (Q) for the 10-year storm event decreased from 37.6 cubic feet per second (cfs) to 33.5 cfs in the pre and post development conditions. This represents a roughly 12 percent decrease in the peak runoff flow rate. A similar decrease in the peak flow runoff rate is experienced in the 100-year storm event. In the pre and post development conditions, the peak runoff rate decreased from 49.8 cfs to 43.8 cfs. This represents an overall 13 percent decrease in the peak runoff flow rate. As evidenced by the decreased peak flow values in 10-year and 100-year storm, under the Post Development conditions the project site would not be negatively impacted in terms of hydrology or hydraulics. Proposed landscape area and various post construction BMPs identified in the project SWQMP would further alleviate the effects of additional hydrological or hydraulic demands which is typically expected from development. Therefore, there would be no impacts relative to hydrology with the implementation of the project.

The project site is not located within the 100-year floodplain of the San Diego River, based on FEMA's Flood Insurance Rate Map (FIRM). The project would not encroach into the floodplain and floodway. The project would not result in increased flooding on- or off-site and would not cause significant impacts on upstream or downstream properties or to environmental resources. The project would not impose flood hazards on other properties or development. No impacts relative to flooding would occur on any properties or environmental resources surrounding the project site.

Grading for the project would consist of approximately 155,000 cy of cut, approximately 42,500 cy of fill, and import 112,500 cy of soil. Grading would not affect slopes over a 25 percent grade as the project site is generally level. The project would result in a change to the amount of pervious and impervious surfaces, with an increase in pervious surfaces associated with the more efficient redevelopment of a predominately impervious site to one with a combination of impervious and

pervious surfaces. The amount of impervious surfaces would decrease from approximately 13 acres to approximately 7.6 acres, leaving the remainder of the site as pervious area. As the project would increase the amount of pervious area, the project site's peak flow runoff would be reduced.

The existing Scripps Mercy Hospital campus includes a college building, parking structures, surface parking lots, MOB, emergency department, Chapel, various utility facilities, and the main hospital building. The existing sewer connections to the public mains on Washington Street, Fifth Avenue, Fourth Avenue, and Sixth Avenue. The anticipated sewer demand for the pre-development condition is 219,530 gallons per day.

The existing eight-inch VCP on Sixth Avenue is at 60 percent full under existing conditions, which exceeds the capacity of 50 percent maximum. To meet the City of San Diego Sewer Design Manual requirements, the existing eight-inch VCP pipe would be upsized to 10-inch pipe. Thereby increasing sewer capacity. Therefore, development of the project would not result in any negative impacts to hydrology.

7.7 Mineral Resources

Based on the City's Thresholds, a project could result in a significant impact associated with mineral resources if it would:

- Result in the loss of availability of a significant mineral resource (e.g. sand or gravel) as identified in the Open File Report 96-04, Update of Mineral Land Classification: Aggregate Materials in the Western San Diego County Production – Consumption Region, 1996, Department of Conservation, California Department of Geological Survey (located in the EAS library).

The project site is not designated as a mineral resource area, as shown on the City of San Diego General Plan Figure CE-6, *Generalized Mineral Land Classification*. Additionally, the property is currently developed and is not being used for mineral resource extraction. The project would not result in the loss of availability of any mineral resources that would be of value to the region. Therefore, there would be no impact on mineral resources with the implementation of the project.

7.8 Paleontological Resources

Based on the City's Thresholds, a project could result in a significant impact associated with paleontological resources if it would:

- Require over 1,000 cubic yards of excavation in a high resource potential geologic deposit/formation/rock unit.

- Require over 2,000 cubic yards of excavation in a moderate resource potential geologic deposit/formation/rock unit.

Paleontological resources, or fossils, are the remains and/or traces of prehistoric plant and animal life. Fossils provide direct evidence of ancient organisms and document the patterns of organic evolution and extinction that have characterized the history of life. Fossil remains, such as bones, teeth, shells, and wood, are found in the geologic deposits (sedimentary rock formations) within which they were originally buried in deep bedrock layers of sandstone, mudstone, or shale. Paleontological resources contain not only the actual fossil remains, but also the localities where those fossils are collected and the geologic formations containing the localities.

The potential for fossil remains at a location can be predicted through previous correlations that have been established between the fossil occurrence and the geologic formations within which they are buried. For this reason, knowledge of the geology of a particular area and the paleontological resource sensitivity of particular rock formations makes it possible to predict where fossils will or will not be encountered.

Paleontological resource sensitivity is typically rated from high to zero depending upon the impacted formations. Paleontological monitoring during grading activities would be required if it is determined that the project's earth movement quantity exceeds the paleontological threshold (if greater than 1,000 cy and 10 feet deep for formations with a high sensitivity rating and if greater than 2,000 cy and 10 feet deep for formations with a moderate sensitivity rating). Monitoring may also be required for shallow grading (less than 10 feet) when a site has been previously graded and/or unweathered formations are present at the surface.

Per the County of San Diego Guidelines, paleontological sensitivity is defined as follows:

- **High Sensitivity:** High sensitivity is assigned to geologic formations known to contain paleontological localities with rare, well-preserved, critical fossil materials for stratigraphic or paleoenvironmental interpretation, and fossils providing important information about the paleobiology and evolutionary history (phylogeny) of animal and plant groups. Generally speaking, highly sensitive formations produce vertebrate fossil remains or are considered to have the potential to produce such remains.
- **Moderate Sensitivity:** Moderate sensitivity is assigned to geologic formations known to contain paleontological localities with poorly preserved, common elsewhere, or stratigraphically unimportant fossil material. The moderate sensitivity category is also applied to geologic formations that are judged to have a strong, but unproven potential for producing important fossil remains.
- **Low Sensitivity:** Low sensitivity is assigned to geologic formations that, based on their relatively youthful age and/or high-energy depositional history, are judged unlikely to

produce important fossil remains. Typically, low sensitivity formations produce poorly preserved invertebrate fossil remains in low abundance.

- **Zero Sensitivity:** Zero sensitivity is assigned to geologic formations that are entirely igneous in origin and therefore have no potential for producing fossil remains. Artificial fill materials are also placed in this category.

According to the site-specific Geotechnical Report (see Appendix J), the project site is situated on a relatively level terrace. The project site is underlain by Pliocene-age San Diego Formation exposed on most of the slopes. Very old paralic deposits, previously designated as Lindavista Formation, cap the surface of the various mesas at the project site. Lastly, artificial fill was placed at numerous locations across the campus to create building pads.

Artificial fill soils are derived from the mechanical compaction of soils placed during earthwork grading operations. Most of the artificial fill on the project site was generated from on-site cuts made into the very old paralic deposits and the San Diego Formation. Documentation of the placement for much of the fill placed during previous phases of the project site's development may not exist or be available; thus, this artificial fill is considered undocumented.

Very old paralic deposits are assigned a "moderate" sensitivity, and San Diego Formation is considered to have a "high" sensitivity for paleontological resources. Artificial fill is not a native geologic unit and, therefore, have no potential for paleontological resources.

The project would result in approximately 155,000 cy of cut and 42,500 cy of fill. The maximum depth of cut would be 49 feet and the maximum fill depth would be 33 feet. Thus, paleontological monitoring would be required. However, compliance with SDMC Section 142.0151 would ensure that project impacts to paleontological resources are less than significant.

7.9 Population and Housing

The project site does not contain existing housing, nor does it propose any new housing that would result in an increase in population. As stated in Chapter 9.0, *Growth Inducement*, the project would not induce substantial population growth in the surrounding area, as the project is an in-fill, redevelopment project. Additionally, since the project does not propose the extension of new roads or other infrastructure into a previously undeveloped area, it does not have the potential to indirectly increase population or housing. Furthermore, the project does not displace existing housing, which could necessitate the construction of replacement housing elsewhere as no housing currently exists on-site. Therefore, the project does not have the potential to result in significant adverse environmental effects associated with population and housing.

7.10 Public Services (Libraries, Recreation, and Schools)

Based on the City's Thresholds, a project could result in a significant impact associated with public services if it would:

- Have an effect upon, or result in a need for new or altered governmental services in any of the following areas:
 - Police protection*
 - Fire/Life Safety protection*
 - Libraries
 - Parks or other recreational facilities
 - Maintenance of public facilities, including roads
 - Schools

*Police protection and Fire/Life Safety protection services are discussed in Section 5.8 *Public Services*.

The project would construct new medical offices, hospital, and related support buildings on the Scripps Mercy Hospital campus. The project does not propose to construct any housing or permanent residential uses and would not add any new residents or increase population in the area. Therefore, the project would not increase demand for libraries, recreational areas, or schools in the community. No impacts to libraries, recreational areas, or schools would occur as a result of the project.

7.11 Tribal Cultural Resources

The City of San Diego has not yet prepared thresholds of significance for potential impacts to Tribal Cultural Resources. Therefore, for purposes of this EIR, guidance provided by issue questions listed in CEQA Appendix G are utilized to evaluate the potential for significant impacts to Tribal Cultural Resources:

- 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
- 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 Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Tribal Cultural Resources (TCRs) include sites, features, places, cultural landscapes, and sacred places or objects that have cultural value or significance to a Native American Tribe. TCRs include "non-unique archaeological resources" that, instead of being important for "scientific" value as a

resource, can also be significant because of the sacred and/or cultural tribal value of the resource. Tribal representatives are considered experts appropriate for providing substantial evidence regarding the locations, types, and significance of tribal cultural resources within their traditional and cultural affiliated geographic area (PRCS 21080.3.1(a)).

The City of San Diego, as Lead Agency, determined that Tribal Cultural Resources pursuant to subdivision PRC Section 5024.1(c) would not be potentially impacted through project implementation, as the project site has been developed and is located within an urban area. There are no recorded resources on site, nor are there any recorded sites within a one-mile radius of the site. In accordance with the requirements of PRC 21080.3.1, the City of San Diego provided formal notification to the Lipay Nation of Santa Isabel and the Jamul Indian Village, both traditionally and culturally affiliated with the project area, requesting consultation via email on March 24, 2021. Both Native American Tribes responded within the 60-day formal notification period and determined that tribal cultural resources would not be anticipated onsite; therefore, consultation was deemed unnecessary. No impact would result.

7.12 Water Quality

Based on the City's Thresholds, compliance with the Water Quality Standards is assured through permit conditions provided by LDR Engineering. Adherence to the City storm water standards is thus considered adequate to preclude surface water quality impacts, unless substantial evidence supports a fair argument that a significant impact will occur.

Implementation of the project would be in proximity to a 303(d) listed water body (San Diego River). Development near this impaired water body could potentially generate pollutants that would exacerbate existing impairments, cause additional pollution, and impact water quality if not properly controlled. The following categories of anticipated or potential pollutants have been identified as "pollutants of concern" based on the project:

- Sediments
- Nutrients
- Heavy metals
- Trash and debris
- Oxygen demanding substances
- Oil and grease

Water quality is affected by sedimentation caused by erosion, by runoff-carrying contaminants, and by direct discharge of pollutants. Potential project-related pollutant discharge and water quality impacts are associated with both short-term construction activities and long-term operation and maintenance of the project site.

Infiltration feasibility screening was conducted at Drainage Management Area (DMA) 1, DMA 2, and DMA 7 and consisted of percolation testing at two locations within each DMA (Perc-1 and Perc-2). Borehole percolation testing at DMA 1 found the unfactored infiltration rate was 0.22 inches per hour at Perc-1 which is greater than 0.05 and less than 0.5 inches per hour and may support partial infiltration. A partial infiltration condition was determined for this area. One borehole percolation test was performed at Perc-2 and the unfactored infiltration rate was 2.47 inches per hour. Full infiltration condition was determined for this area. For DMA 2 borehole percolation testing found infiltration rates of were 0.01 inchehs/hour at Perc-1 and 0.03 inches per hour at Perc-2. Reliable infiltration rate is less than 0.05 inches/hour and partial infiltration is not required. No infiltration condition was determined for DMA 2. At DMA 7 borehole percolation testing was performed to evaluate the infiltration rate at the site and the reliable infiltration rate was 0.02 inches per hour at Perc-1 and was 0.01 inches per hour at Perc-2. No infiltration condition was determined for DMA 7.

The site was determined to not be self-mitigating, de minimis, or self-retaining, while harvest and reuse was determined to be infeasible. Due to the underlying Scripps formation layer, the campus is under 'No Infiltration' condition. Thus, biofiltration planters were chosen and sized for the DCV.

The project would implement structural BMPs including seven biofiltration planters and a Modular Wetland System on Sixth Avenue. The project would also implement nine DMAs which are described in the table below.

DMA	Area (Acres)	Percent Pervious	Required BMP Capacity	Proposed BMP Capacity
DMA 1	2.39	92	8,712 CF	8,760 CF
DMA 2	1.79	72	2,888 SF	2,900 SF
DMA 3	1.29	75	1,895 SF	1,900 SF
DMA 4	0.64	71	970 SF	1,000 SF
DMA 5	1.52	71	2,190 SF	2,200 SF
DMA 6A	0.32	99	628 SF	630 SF
DMA 6B	0.37	95	724	730 SF
DMA 6C	1.08	95	2,098	2,100 SF
DMA 7	0.36	91	712 SF	715 SF
DMA 8	0.24	95	493 SF	495 SF
DMA 9	0.16	90	319 SF	325 SF

The project would implement a Hydromodification Plan, including appropriate source control, site design, and treatment-control BMPs during construction and post-construction, as well maintenance efforts in conformance with the City of San Diego's Stormwater Standards (May 2021). With these measures, the project is characterized as not expected to have significant adverse impacts on water quality. Implementation of the proposed BMPs would preclude significant potential impacts to water quality.

Additionally, the project would comply with associated requirements including the NPDES Construction General, Municipal and Groundwater permits. These requirements have been reviewed by qualified City staff and would be reverified during the ministerial process. Adherence with the standards would preclude considerable degradation to water quality. Therefore, pollutant discharge and water quality impacts associated with construction and operation of the project would not occur.

7.13 Wildfire

The VHFHSZ Map, as shown on Figure 5.9-2, was established on February 24, 2009, in coordination between the San Diego Fire Department and CAL FIRE. The VHFHSZ map identifies areas within and adjacent to the project site that would fall into a risk zone. However, the project site is mostly surrounded by urban development. The remaining area of vegetated fuel load is located along the northeast corner and east boundary of the project site. Additionally, the project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. The project would be in compliance with applicable regulatory requirements pertaining to fire hazards and prevention, including Section 142.0412 (Brush Management) of the SDMC. Project implementation would include compliance with brush management regulations, including the provision of Brush Management Zones 1 and 2, as well as alternative compliance where strict adherence to brush management regulations is not feasible. Brush Management Zone 1 extends 35 feet out from the structure towards flammable vegetation on a level portion of the property. Brush Management Zone 2 is the remaining 65 feet that extends beyond Zone 1, typically comprised of undisturbed vegetation on a slope.

A Brush Management Plan has been prepared for the project. The project cannot provide a full 35-foot defensive space for Zone 1 at MOB due to the existing slope gradient of greater than 4:1. Additionally, new development cannot extend Zone 2 greater than 65-feet to compromise for the lack of a full Zone 1. Therefore, the development is subject to alternative compliance. The project would include dual glazed windows and sprinklers in the building, and a Brush Management Plan for the abutting property, which is also a part of the Scripps Mercy Campus.

Through compliance with applicable regulatory requirements, hazards associated with wildfires would be substantially reduced. Therefore, the project does not have the potential to result in significant adverse environmental effects associated with wildfire.

8.0 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

This section addresses irreversible environmental changes that would be involved should the project be implemented.

8.1 Introduction

As required by Section 15126.2(c) of the CEQA Guidelines, the significant irreversible environmental changes of a project shall be identified. Irreversible commitments of non-renewable resources are evaluated to assure that their use is justified. Irreversible environmental changes typically fall into three categories: primary impacts, such as the use of nonrenewable resources; secondary impacts, such as highway improvements that provide access to previously inaccessible areas; and environmental accidents associated with a project. Section 15126.2(d) of the CEQA Guidelines states that irretrievable commitments of resources should be evaluated to assure that current consumption of resources is justified.

8.2 Impacts Related to Nonrenewable Resources

Development would occur as a result of the project that would entail the commitment of energy and natural resources. (See Chapter 7.0, Section 7.3, *Energy*, for a discussion of energy use associated with the project.) The primary energy sources would be electricity, natural gas, and fossil fuels. Use of electricity, natural gas, and fossil fuels represents an irreversible commitment of these resources. Construction of the project would also require the use of various raw materials, including cement, concrete, lumber, steel, etc. These resources would also be irreversibly committed. Once constructed, operation of the project would entail a further commitment of energy resources in the form of fossil fuels and electricity. This commitment would be a long-term obligation since the project would result in the development of structures that are likely to have a useful life of 20 to 30 years or more.

As presented in Section 7.3, *Energy*, the project would increase demand for energy in the project area and SDG&E's service area. However, no adverse effects on non-renewable resources are anticipated. The project would follow Uniform Building Code (UBC) and Title 24 requirements for energy efficiency and would incorporate sustainable design features directed at reducing energy consumption. The impact of increased energy usage would not result in a significant adverse environmental impact.

Additionally, the project would be consistent with the City's CAP. A CAP Consistency Checklist has been prepared for the project that outlines specific strategies and actions that reduce greenhouse gas emissions, which would also reduce energy consumption. For example, pursuant to CAP

Strategy 1, the project would include roofing materials with a minimum three-year aged solar reflection and thermal emittance or solar reflection index equal to or greater than the values specified in the voluntary measures under California Green Building Standards Code; or would include roof construction that has a thermal mass over the roof membrane, including areas of vegetated (green) roofs weighing at least 25 pounds per square foot as specified in the voluntary measures under California Green Building Standards Code; or would provide a combination of these two design features. In addition, the project would be in compliance Appendix A6.1 of the California Green Building Standards Code – Voluntary Standards for Health Facilities. These features would contribute to more energy- and water-efficient buildings. In accordance with Strategy 3, the project includes electric vehicle parking spaces with the necessary electric vehicle supply equipment installed to provide active electric vehicle charging stations ready for use by residents.

8.3 Other Environmental Changes

As evaluated in Chapter 7.0, *Effects Found Not to be Significant*, implementation of the project would not result in significant irreversible impacts to agricultural; biological; energy; geologic; health and safety; hydrology; mineral, paleontological resources; population and housing; public services related to libraries, parks, and schools; tribal cultural resources; water quality and wildfire. The project site is currently accessible via regional transportation facilities and local roadways. The immediate vicinity is a largely developed, urbanized area of the City with single- and multi-family residential developments to the north, commercial uses to the south, medical offices to the west with multi-family residential and commercial uses further to the west, and SR 163 and open space slopes located to the east and northeast. No new freeways or roadways are proposed that would provide access to currently inaccessible areas. Therefore, implementation of the project would not result in a significant irreversible commitment with regard to unplanned land use.

9.0 GROWTH INDUCEMENT

In accordance with Section 15126(d) of the State CEQA Guidelines, an EIR must include an analysis of the growth-inducing impacts of the project. The growth inducement analysis must address: (1) the ways in which the project could foster economic or population growth, or the construction of additional housing, either directly or indirectly in the surrounding environment; and (2) the potential for the project to encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. This second issue involves the potential for the project to induce further growth by the expansion or extension of existing services, utilities, or infrastructure. The State CEQA Guidelines further state that “[i]t must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment” (Section 15126.2[d]). The City of San Diego’s CEQA Significance Determination Thresholds state that a project would have a significant impact related to growth inducement if it would:

1. Induce substantial population growth in an area;
2. Substantially alter the planned location, distribution, density, or growth rate of the population of an area; or
3. Induce extensions of roads or other infrastructure not assumed in the community plan or adopted Capital Improvement Project list, when such infrastructure exceeds the needs of the project and could accommodate future development.

Relative to growth inducement and based on the City’s Thresholds (July 2016), the EIR must analyze the consequences of growth. According to Section 15126.2 (d) of the CEQA Guidelines, it must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment. In general, the analysis must avoid speculation and focus on probable growth patterns or projections. Conclusions must also be presented that determine whether this impact is significant and/or unavoidable, and provide for mitigation or avoidance, as necessary.

9.1 Short-term Effects

During construction activities associated with the project, demand for various construction trade skills and labor would increase. However, it is anticipated that this demand would be met by the local labor force and would not require importation of a substantial number of workers that could cause an increased demand for temporary or permanent housing in this area. Further, construction of the project is divided into several phases. While the size of the project would require a construction period longer than most projects, construction phases would nonetheless be short-term and temporary. It would not lead to an increase in employment on-site that would stimulate the need for additional housing or services. Therefore, no associated substantial short-term growth-inducing effects would result.

9.2 Long-term Effects

The project involves the phased construction of various buildings on the Scripps Mercy Hospital Campus, including a medical office building, hospital support buildings, two main hospital buildings, and associated parking. The proposed project would result in a greater availability of hospital services, which would serve projected increases in demand in the area. As the local population ages, the demand for medical services and hospital beds in the area could also increase, while more efficient means to meet these demands would also be needed to otherwise keep potentially rising costs down. Meeting projected demands for hospital and medical services would not be growth-inducing. Jobs on the project site would continue to be present and support these demands; the project would not result in creating a substantial number of new jobs that would induce growth in the area. Rather, the project focuses on modernizing the hospital facility to serve existing and projected needs. The hospital would not be expanded to accommodate a larger number of patients. As such, while employment numbers may be affected, total services offered would remain generally the same as today.

In addition, the project promotes infill redevelopment in portions of the developed campus rather than encouraging new development within a currently undeveloped area. All major public services and utilities currently service the area and would continue to service the site as redevelopment occurs. Therefore, growth inducement as a result of the extension of these facilities into a new area would not occur. The project would not require the extension or expansion of roadways, public services, utilities, or infrastructure into areas currently without service. As a result, development of the project would not remove any physical barriers to growth. Therefore, growth inducement would not be significant as a result of the project.

10.0 PROJECT ALTERNATIVES

10.1 Introduction

In accordance with Section 15126.6(a) of the CEQA Guidelines, an EIR must contain a discussion of a range of reasonable alternatives to the project, or to the location of a project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. Section 15126.6(f) further states that the range of alternatives required in an EIR is governed by a 'rule of reason' that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. Thus, the following discussion focuses on project alternatives that are capable of eliminating significant environmental impacts or substantially reducing them as compared to the project, even if the alternative would impede the attainment of some project objectives, or would be more costly. In accordance with Section 15126.6(f)(1) of the State CEQA Guidelines, among the factors that may be taken into account when addressing the feasibility of alternatives are: (1) site suitability; (2) economic viability; (3) availability of infrastructure; (4) general plan consistency; (5) other plans or regulatory limitations; (6) jurisdictional boundaries; and (7) whether the proponent can reasonably acquire, control, or otherwise have access to the alternative site. Additionally, a discussion on alternatives that were considered but rejected from further detailed analysis is provided.

10.2 Project Objectives

In accordance with State CEQA Guidelines Section 15126.6(a), the project alternatives are assessed relative to their ability to (1) meet the basic objectives of the project and (2) avoid or substantially lessen the significant effects of the project. Therefore, in developing the alternatives to be addressed in this section, consideration was given regarding an alternative's ability to meet the objectives of the project. As presented in Chapter 3.0, *Project Description*, the project objectives are:

- Meet the seismic safety requirements of Senate Bill 1953 by replacing the non-conforming existing hospital buildings on the campus by 2030 while maintaining existing health care operations in the community.
- Replace aging-buildings and utilities infrastructure through redevelopment of the Scripps Mercy Hospital Campus in a manner that promotes community wellness, healthcare, and technology in both its facilities and its site development.
- Maximize development intensity on the project site to allow for the optimal expansion of services to meet the needs of the community by providing patient centered, personalized, private care in the appropriate setting.
- Enhance the work environment and increase employment opportunities with expanded services offered.

- Promote a welcoming patient experience by ensuring ease of access and wayfinding efficiency and by establishing the medical campus as a destination for healthcare within the community.
- Establish an integrated campus of programs, facilities, and operations that serve the current community health care needs.
- Establish a Medical Office Building to house ambulatory services and programs designed to support hospital-based programs in a lower cost environment and provide growth opportunities as well as flexibility in meeting evolving outpatient needs.
- Improve campus access and circulation while minimizing transportation effects to adjoining neighborhoods.
- Improve transportation-related facilities including parking structures, transit, and passenger drop-off and pick-up areas in a way that allows for intuitive vehicular, biking, and patient-oriented access.
- Enhance the campus entry for patients, visitors, and employees, as well as the surrounding community.
- Separate facility supply delivery and support services access from patient, visitors and staff to enhance delivery of health care services on campus.

10.3 Significant Impacts of the Project

The review of alternatives includes an evaluation to determine if any specific significant environmental effect(s) would be substantially less than the project. A significant effect is defined in Section 15382 of the CEQA Guidelines as a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project.

Based on the analysis contained in Chapter 5.0 of this EIR, project implementation would result in significant impacts associated with cumulative impacts associated with land use (operational noise impact due to increased traffic volumes on one street segment), direct impacts to air quality (health risk due to diesel emissions) and noise (construction noise at sensitive receptors and operational noise impact due to increased traffic volumes on one street segment). Mitigation measures have been identified that reduce air quality health risk impacts and construction noise impacts to below a level of significance. There are no feasible mitigation measures to reduce operational noise impacts to below a level of significance.

As addressed in Chapter 6.0, *Cumulative Effects*, cumulative impacts have been evaluated for build-out of the Uptown Community Plan as part of the Uptown CPU Program EIR. Cumulative impacts at the Community Plan build-out level included the development intensity of the project. As concluded in Chapter 6.0, the project would not result in cumulative impacts beyond those already addressed in Uptown CPU Program EIR.

10.4 Alternatives Considered but Rejected

The following alternatives were considered for the project. These alternatives were rejected from further consideration as these alternatives would not reduce or avoid project impacts and may increase significant impacts associated with the project and would not meet the project objectives.

10.4.1 Alternative Locations

Consideration was given to alternative sites located within the Uptown community, as well as other areas in the City, where the project could occur. In accordance with CEQA Guidelines Section 15126.6(f)(2), identifying possible alternative locations focused on sites where any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project would need to be considered for inclusion in the EIR.

The project proposes an integrated hospital campus on approximately 21 acres within the Uptown community via partial redevelopment and modernization/enhancement of the fully-developed project site. The project site is centrally located for patients within the urban core of San Diego and has been developed with this specific use for about a century. Additionally, the project site provides synergy with other medical uses within the Medical Complex and Hillcrest neighborhoods, to include UCSD Medical campus and numerous medical office buildings. The project requires a large land mass to serve as a full-service medical campus facility. Additionally, such a site must be accessible by public transit. There are no other sites available within the Uptown community that would allow for such a facility to be developed.

While there may be areas in other portions of the City that remain undeveloped and of appropriate size to develop the project, these sites could be constrained to a greater degree by environmental resources, do not share the same qualities as the project site with respect to transit and accessibility, or would result in similar or greater environmental effects. The project is proposed on a developed medical campus site, which is centrally located within the City and the Uptown community and is under one ownership. The site has easy access to public streets and freeways and would be served by existing transit. Large landholdings that could accommodate the project could be further removed from existing infrastructure and lack access to transit. The same project in another location could result in greater VMT impacts than the project.

The project would result in a significant unmitigated operational and construction impact relative to noise. The operational noise impact is primarily related to increased trips on surrounding streets. Relocating the project to another site within the City may reduce the operational noise impact. However, as the size and scope of the project would remain the same, an alternative site could require more and longer trips due to lack of proximity to transit and a mix of existing uses, thereby

increasing other impacts, such as air quality and greenhouse gas emissions. An alternative site could also result in greater construction noise impacts, depending on location and amount of sensitive receptors proximate to the alternative site.

Thus, locating the project on an alternative site in the City would not avoid or substantially lessen the project's impacts and could result in greater environmental effects. Furthermore, the project applicant does not own any other properties within the City of a size to accommodate the project. For these reasons, there are no other feasible alternative locations for the project as proposed. Finally, the site is being proposed for land uses that are consistent with the Community Plan's identified land use and zoning; there are no land use conflicts that would be avoided by analyzing an alternative site. For these reasons, no alternative site location was analyzed in detail within the EIR.

10.4.2 Operational Noise Impact Avoidance Alternative

As presented in Section 5.7, *Noise*, the project would result in significant operational noise impact associated with a 3 dBA or greater increase in noise (from the current 73.7 CNEL to 77.0 CNEL) due to increased traffic on one roadway segment – Fourth Avenue, between Montecito Way and Lewis Street. This impact cannot be mitigated.

An alternative was considered that would avoid the significant increase in noise levels on Fourth Avenue, between Montecito Way and Lewis Street. In order to avoid the impact, traffic from the project would need to be reduced by 90 percent at this location (from 14,564 ADT to approximately 1,400 ADT). This would result in essentially eliminating any increase in traffic from the project site and thus no redevelopment of the project and no new construction. Such an alternative would not be able to meet State law and seismic building codes requirements or any of the project objectives. Therefore, consideration of an alternative that would avoid the operational noise impact has been rejected from further consideration.

10.4.3 Retrofit Existing Buildings Alternative

A primary objective of the project is to meet the seismic safety requirements of Senate Bill 1953 by replacing the non-conforming existing hospital buildings on the campus by 2030. The project meets this primary objective through redevelopment of the hospital campus with two new hospitals and associated facilities, replacing aging buildings and utilities infrastructure, constructing new up-to-date buildings, and expanding services offered by the hospital to better serve the community.

The Retrofit Existing Buildings alternative was evaluated. This alternative would not replace, rebuild, and expand the Scripps Mercy Hospital campus buildings and facilities. Instead, this alternative evaluates retrofitting the existing hospital buildings to meet Senate Bill 1953. Existing buildings would remain; no new buildings would be constructed; there would be no change to the current

amount of beds for the hospital. In this manner, the Retrofit Existing Buildings alternative would be much like the No Project/No Build alternative. However, under the Retrofit Existing Buildings, existing buildings would be remodeled to ensure seismic safety as mandated by the State.

When compared to the project, the Retrofit Existing Buildings alternative would avoid significant and unmitigated operational noise impacts associated with the project. The Retrofit Existing Buildings alternative would also avoid mitigable impacts to health risk associated with air quality and construction noise impacts. This alternative would result in the same level of less than significant impact or no impact as the project relative to land use, transportation and circulation, visual effects and neighborhood character, public utilities, and public services and facilities.

However, this alternative would require that the entire hospital be shut down during retrofitting. All patients would need to be re-located, and no new patients could be admitted. Additionally, all emergency services at Scripps Mercy Hospital, including life-flight helicopter operations, would cease. Retrofitting is estimated to take approximately 60 months. Relocating patients and stopping all operations at the hospital would have a devastating effect on medical and emergency services for the community and City, which could be catastrophic during times of emergencies or in the event of a future pandemic.

While the Retrofit Existing Buildings alternative would meet the project's primary objective to replace existing hospital buildings on the campus for seismic safety in accordance with seismic safety requirements of Senate Bill 1953 by 2030, this alternative would not allow the hospital to maintain existing health care operations in the community, as it would have to be removed from operations during retrofitting. Furthermore, this alternative would not meet any of the project's other objectives.

10.5 Alternatives Considered

The alternatives identified in this analysis have been developed in order to further reduce or avoid significant environmental impacts associated with the project. These include the "no project" alternative that is mandated by CEQA and two Reduced Development Intensity alternatives. The discussion of project alternatives in this section provides:

- A description of the alternatives considered.
- The identification of the impacts of the alternatives.
- A comparative analysis of the impacts of the alternatives under consideration and the project. The focus of this comparative analysis is to determine if the alternative is capable of eliminating or substantially reducing the significant environmental effects of the project.
- A determination as to whether the alternative meets the objectives of the project.

Table 10-3, *Comparison of Alternatives to Project*, presented at the end of this section provides a comparison of environmental issues for all alternatives analyzed in this section.

10.5.1 No Project/No Build Alternative

CEQA Guidelines Section 15126.6(e) requires that an EIR evaluate a “no project” alternative, along with its impacts. The purpose of describing and analyzing a no project alternative is to allow a lead agency to compare the impacts of approving the project to the impacts of not approving it. Specifically, Section 15126.6(e)(3)(B) requires that an EIR for a development project on an identifiable property address the no project alternative as circumstances under which the project does not proceed. In other words, the no project assumes that the project site would not be developed with the project.

Under the No Project/No Build alternative, the project would not be implemented on the site. None of the improvements or redevelopment associated with the project would occur. Instead, the site would be remains as it exists currently, with the Scripps Mercy Hospital in operation.

(It should be noted that the no project alternative would not be feasible due to State law and seismic building codes requiring modifications to the hospital and associated buildings in order to meet HCAI requirements by January 1, 2030. This alternative is presented in this section to meet the intent of CEQA.)

10.5.1.1 Environmental Analysis

Land Use

The project site is currently developed with the Scripps Mercy Hospital Campus. Under the No Project/No Build alternative, the hospital would continue operation. Continued operation of the hospital would not result in potential impacts relative to land use, as the existing use is consistent with the underlying zone and land use designations. Like the project, this alternative would not physically divide an established community and would not result in land uses that are incompatible with the SDIA ALUCP.

This alternative would not require deviations for exceeding FAR, as no new development would occur. This alternative would be generally consistent with the General Plan, the Uptown Community Plan, and the Uptown Community Plan CPIOZ Type A; however, this alternative would not allow for the expansion of healthcare facilities consistent with General Plan Policy PF-O.2 and Community Plan goals relative to providing opportunities for new medical office development/expansion of medical-related development and employment and Community Plan Policy EP-1.5.

Transportation and Circulation

Continued operation of the Scripps Mercy Hospital Campus, as would occur under this alternative, would not result in additional trips being generated by the use. Existing VMT would not change. Because the No Project/No Build alternative assumes continued operation under of the existing medical facilities and no new development, no transportation improvements would be required.

Transit opportunities in the project vicinity include bus service. Pedestrian and bicycle opportunities are provided through sidewalks and bicycle lanes throughout Uptown. The No Project/No Build alternative would not affect bus service and would not affect existing pedestrian and bicycle facilities. However, this alternative would not provide upgrades to the bus stop or other improvements to pedestrian/bicycle accessibility and connectivity to and through the site and, therefore, would not result in the benefits to mobility options created by the project.

Visual Effects and Neighborhood Character

The No Project/No Build alternative would retain the existing medical buildings and would not include any new development, redevelopment, or alterations to the site or its appearance as it exists today. The project would not create a negative aesthetic on-site; similarly, this alternative would not create a negative aesthetic and it would also not result in an inconsistency relative to bulk, scale, materials, or style of the surrounding development, as no redevelopment would occur. Although the existing and planned character in the surroundings of the site continues to evolve and intensify, the existing use would not result in a substantial alteration to the surrounding character, as the use currently exists within the community fabric. This alternative would not create new sources of light or glare, as such sources already exist on-site. Like the project, this alternative would not result in significant impacts relative to visual effects and neighborhood character.

Air Quality

Under the No Project/No Build alternative, no changes to the existing site would result. No demolition, grading, and construction would occur. Air emissions associated with medical campus operations and use would continue. The medical campus operations would be consistent with and would not impair the implementation of the RAQS, SIP, and AQMP, as existing development would have been taken into account in the preparation of those documents. No objectional odors would occur as a result of continued medical campus operation and no exposure to toxic air contaminants or CO hot spots would occur, as no increase in vehicle trips would be anticipated. Because no redevelopment would occur, no new construction emissions would occur, avoiding the potential health risk associate with diesel emissions during construction. Air quality impacts would be considered less than the project under this alternative, because no construction would occur, and health risk associated with diesel emissions would be avoided.

Historical Resources

No demolition of existing structures would occur as a result of the No Project/No Build alternative, because the medical campus would remain in operation as it exists today. As such, there would be no opportunity to affect historical resources. No historical resources impacts would result.

As part of the project, the Mercy Chapel, which is a San Diego registered historic resource, would be rehabilitated in accordance with the Secretary of Interior's Standards for the Treatment of Historic Resources. Rehabilitation of the Mercy Chapel would not occur under this alternative.

Noise

The noise levels generated by the existing operations would continue under this alternative. No new operational noise sources would be created within the surrounding community (as increased traffic associated with the project would not occur) and no construction noise would occur. This alternative would result in less noise impacts than what would occur with the project.

Greenhouse Gas Emissions

Under the No Project/No Build alternative, emissions would be associated with on-going operation and maintenance of the medical campus. No new construction would occur. As no new development or emissions would be generated, no GHG impacts would occur. Although a significant GHG impact was not identified for the project, generation of GHG emissions would be less under this alternative when compared to the project.

Public Utilities

The No Project/No Build alternative would not affect public utilities. Sewer, water, gas, and electric services would continue to be provided as they are today. The No Project/No Build alternative would avoid new impacts to solid waste, as no construction or increased operational waste generation would occur. While the project would not result in significant impacts to public utilities, this alternative's environmental effect would be incrementally less than the project.

Public Services and Facilities

The No Project/No Build alternative would not result in development that would increase population resulting in a need to expand public services and facilities. Impacts to public services and facilities when compared to the project would be considered less. While the project would not result in significant impacts to public services and facilities, this alternative's environmental effect would be incrementally less than the project.

Cumulative Effects

The No Project/No Build alternative would not result in any new cumulative impacts, as no new development would occur. Thus, cumulative impacts under this alternative would be less than the project.

10.5.1.2 Evaluation of Alternative

The No Project/No Build alternative would result in no changes to the current site conditions. The project would not be implemented, and the Scripps Mercy Hospital Campus would remain in operation as it does today.

When compared to the project, the No Project/No Build alternative would avoid significant unmitigated operational noise impact associated with the project. The No Project/No Build alternative would also avoid mitigable impacts to health risk associated with air quality and construction noise impacts. This alternative would result in the same level of less than significant impact or no impact as the project relative to land use, transportation and circulation, visual effects and neighborhood character, public utilities, and public services and facilities. The No Project/No Build alternative would not meet any of the project objectives.

Furthermore, the No project alternative would not be feasible. State law and seismic building codes require modifications to the hospital and associated buildings in order to meet HCAI requirements by January 1, 2030.

10.5.2 Replace Hospital Buildings Only Alternative

A primary objective of the project is to meet the seismic safety requirements of Senate Bill 1953 by replacing the non-conforming existing hospital buildings on the campus by 2030. The project meets this primary objective through redevelopment of the hospital campus with two new hospitals and associated facilities. The project would further enhance care by replacing aging buildings and utilities infrastructure, constructing new up-to-date buildings, and expanding services offered by the hospital to better serve the community.

The Replace Existing Hospital Buildings Only alternative would demolish and reconstruct the central portion of the campus as two new hospitals and hospital support building in a manner that meets the requirements of Senate Bill 1953. (See Table 10-1, *Replace Existing Buildings Only Alternatives Compared to Proposed Project*, and Figure 10-1, *Area of Replace Hospital Buildings Only Alternative*.) The Behavioral Health Building and the 550 Washington Building would be demolished to allow for construction of Hospital I and the Hospital Support Building. The existing Emergency Department and Scripps Mercy Hospital would then be demolished, and Hospital II would be constructed. This would allow for the existing Scripps Mercy Hospital to remain in operation while Hospital I is being

constructed. All other portions of the campus would remain as they are today. Like the project, overall bed count would not change from what exists today. The MOB proposed as part of the project would not be developed under this alternative. Instead, the location of the MOB would remain a parking structure.

10.5.2.1 Environmental Analysis

Land Use

The project site is currently developed with the Scripps Mercy Hospital Campus. The Replace Existing Hospital Buildings Only alternative would not result in potential impacts relative to land use, as the existing use is consistent with the underlying zone and land use designations. Like the project, this alternative would not physically divide an established community and would not result in land uses that are incompatible with the SDIA ALUCP. Like the project, this alternative would require a zone deviation for FAR, as the existing development exceeds the FAR of the underlying zone. Like the project, this deviation would not result in significant land use impacts. This alternative would be consistent with the General Plan and the Uptown Community Plan. Relative to the Uptown Community Plan CPIOZ Type A, this alternative would require an NDP for building heights. This alternative would allow for the expansion of healthcare facilities consistent with General Plan Policy PF-O.2 and Community Plan goals relative to providing opportunities for new medical office development/expansion of medical-related development and employment and Community Plan Policy EP-1.5; although, not to the level that the project would.

Transportation and Circulation

This alternative would result in the construction of two new hospitals and the hospital support building to replace the existing hospital buildings, resulting in an increase of 1,078,800 square feet beyond that which occurs on the project site today. However, because this alternative would not construct the new medical office building and the overall bed count would not change, this alternative would result in a 1,330 ADT decrease in trips when compared to the project. Existing VMT would not change. This alternative would require implementation of TDM measures in accordance with the CAP Consistency Checklist.

Transit opportunities in the project vicinity include existing bus service. Pedestrian and bicycle facilities are provided through sidewalks and bicycle lanes throughout Uptown. The Replace Existing Hospital Buildings Only alternative would not affect bus service and would not affect existing pedestrian and bicycle facilities. However, this alternative would not provide upgrades to the bus stop or other improvements to pedestrian/bicycle accessibility and connectivity to and through the site and, therefore, would not result in the benefits to mobility options created by the project.

Visual Effects and Neighborhood Character

The Replace Existing Hospital Buildings Only alternative would redevelop the central portion of the hospital campus with two new hospitals and a hospital support building. All other parts of the campus would remain as they are today. As discussed in this EIR, the project would not create a negative aesthetic on-site; similarly, this alternative would not create a negative aesthetic and it would also not result in an inconsistency relative to bulk, scale, materials, or style of the surrounding development, as no redevelopment would occur. Although the existing and planned character in the surroundings of the site continues to evolve and intensify, the Replace Existing Hospital Buildings Only alternative would also not result in a substantial alteration to the surrounding character, as the use currently exists within the community fabric. This alternative would not create new sources of light or glare, as such sources already exist on-site. Like the project, this alternative would not result in significant impacts relative to visual effects and neighborhood character.

Air Quality

Under the Replace Existing Hospital Buildings Only alternative, the existing hospital would be demolished and two new hospitals and a hospital support building would be constructed in its place. As such, this alternative would result in generation of diesel emissions during construction, albeit to a lesser degree than with the project. While diesel emissions would decrease under this alternative, the reduction would not be substantial enough to reduce health risk impacts to below a level of significance. Mitigation measures as required for the project would be required with this alternative. Air emissions associated with medical campus operations and use would continue as they occur today, as no increase in traffic, other than required for construction, would occur under this alternative. The medical campus operations would be consistent with and would not impair the implementation of the RAQS, SIP, and AQMP, as existing development would have been taken into account in the preparation of those documents. No objectional odors would occur as a result of continued medical campus operation and no exposure to toxic air contaminants or CO hot spots would occur, as no increase in vehicle trips would be anticipated. Air quality impacts would be considered less than the project under this alternative, because significant impacts associated with health risk associated would be avoided.

Historical Resources

The Replace Existing Hospital Buildings Only alternative would result in demolishing the existing hospital, as well as the Behavioral Health Building and 550 Washington Building; all other parts of the hospital campus would remain unchanged. The existing hospital, Behavioral Health Building and 550 Washington Building are not historic. Therefore, like the project, this alternative would not affect historical resources.

As part of the project, the Mercy Chapel, which is a San Diego registered historic resource, would be rehabilitated in accordance with the Secretary of Interior's Standards for the Treatment of Historic Resources. Rehabilitation of the Mercy Chapel would not occur under this alternative.

Noise

This alternative would result in an increase in noise during construction of two new hospitals and a hospital support building. As with the project, construction of new the hospital support building would occur proximate to an adjacent residential building. Impacts to this NSLU would be significant and would require mitigation measures similar to the proposed project.

The project would result in an increase in traffic volumes on a segment of Fourth Avenue, causing an increase in vehicular noise levels and a significant operational noise impact. Although traffic volumes would be less under this alternative, operational noise impacts would occur which cannot be mitigated. Thus, like the project, this alternative would result in significant and unmitigated operational noise impacts.

Greenhouse Gas Emissions

Under the Replace Existing Hospital Buildings Only alternative, emissions would be associated with on-going operation and maintenance of the medical campus, as well as construction of two new hospitals and a hospital support buildings. Like the project, this alternative would require consistency with the CAP. Thus, this alternative would not conflict with the CAP or any other applicable plan, policy, or regulation adopted for the purpose of reducing emissions of greenhouse gases. This alternative would have the same level of no significant impact relative to greenhouse gas emissions as the project.

Public Utilities

The Replace Existing Hospital Buildings Only alternative would require connections to public utilities, including sewer, water, gas, and electric services, to serve the new buildings. This alternative would also generate solid waste; however, at a reduced level when compared to the project. While the project would not result in significant impacts to public utilities, this alternative's environmental effect would be incrementally less than the project, because construction would be limited to the new hospital and hospital support buildings. However, neither the project nor this alternative would result in significant impacts to public utilities. Therefore, the Replace Existing Hospital Buildings Only alternative would have the same level of no significant impact relative to public utilities as the project.

Public Services and Facilities

The Replace Existing Hospital Buildings Only alternative would not result in development that would increase population resulting in a need to expand public services and facilities. Impacts to public services and facilities when compared to the project would be considered less, because there would be less increase in employees, building space, and the need for fire and police services. While this alternative's environmental effect would be incrementally less than the project, the Replace Existing Hospital Buildings Only alternative would have the same level of no significant impact relative to public services as the project.

Cumulative Effects

Like the project, this alternative, when taken into account with other cumulative projects, would not result in a significant land use impact and would not result in a cumulatively considerable contribution to a land use compatibility impact. This alternative would also be consistent with the City's alternative transportation policies and would not result in cumulative impacts related to transportation policy would be less than significant. Also like the project, this alternative would not result in VMT exceeding thresholds identified in the TSM, and cumulative VMT impacts associated with the project would not be significant.

Like the project, this alternative would not result in substantial alteration to the existing or planned character of the area and would not contrast with existing surrounding development through excessive height or bulk. Cumulatively significant impacts to visual quality and neighborhood character would not occur.

Like the project, construction emissions associated with the Replace hospital Buildings Only alternative would not conflict with the SIP, RAQS or AQMP, violate an air quality standard or contribute to an existing or projected violation, result in a cumulatively considerable increase in ozone or particulate matter emissions or expose receptors to substantial pollutant concentrations. This alternative would also not result in cumulatively significant air quality impacts associated with operations and would not result in cumulatively significant impacts associated with odors. This alternative would also result in a significant air quality impact associated with health risk due to the level of diesel emissions during construction and would require mitigation as required for the project.

The project site does not contain any structures that would be adversely affected by the project as historical resources for the purposes of CEQA compliance. Furthermore, no existing religious or sacred uses are located on the project site, and the project is not located within a high sensitivity level for archaeological resources. Therefore, like the project, this alternative would not result in cumulatively significant impacts to historical resources.

Similar to the project, noise levels from construction of this alternative to off-site sensitive receptors would exceed the limits defined in the City Noise Ordinance during construction of the hospital support building. Mitigation would be required to reduce significant construction noise impacts to below a level of significance. As with the project, given the rapid attenuation of noise with distance, it would be too speculative to conclude that construction noise generated by the project would combine with the construction of other projects in the vicinity to generate a significant impact above the City's construction noise standards. Construction noise and vibration impacts associated with this alternative would, therefore, not be cumulatively considerable.

Like the project, this alternative project would result in significant impacts associated with operational (vehicular) noise due to increased trip generation on Fourth Avenue. There is no

standard procedure to ensure that exterior noise affecting existing NSLUs is sufficiently attenuated to meet City standards. Therefore, there are no feasible mitigation measures to reduce this traffic noise level to a less than significant impact. Impacts related to traffic noise at Fourth Avenue would result in a cumulatively considerable impact on noise that cannot be mitigated.

Relative to GHG emissions, like the project, this alternative would require consistency with the CAP through implementation of specific CAP Consistency Checklist strategies. Thus, contribution of GHG emissions to cumulative Statewide emissions would be less than cumulatively considerable.

Like the project, this alternative would not result in significant impacts to public services, public facilities, or public utilities. This alternative would not generate any new residents or population and that could significantly contribute to the demand for libraries, parks and recreation or school services, which are typically resident-focused. Like the project, this alternative would not trigger the need to construct a new police, fire, or EMS facility in order to meet response times and would not result in the need to construct or substantially alter public utility systems or infrastructure. Cumulatively considerable impacts on public facilities and utilities would not occur.

10.5.2.2 Evaluation of Alternative

The Replace Existing Hospital Buildings Only alternative would demolish and reconstruct the central portion of the campus as two new hospitals and hospital support building in a manner that meets the requirements of Senate Bill 1953. All other portions of the campus would remain as they are today.

When compared to the project, the Replace Existing Hospital Buildings Only alternative would avoid significant and unmitigated operational noise impacts associated with the project, as this alternative would result in a decrease in trips. However, like the project, this alternative would result in significant noise impacts associated with construction and significant air quality health risk impacts associated with diesel emissions and would require mitigation measures as presented in Chapter 5.0, *Environmental Analysis*. This alternative would result in the same level of less than significant impact or no impact as the project relative to land use, transportation and circulation, visual effects and neighborhood character, public utilities, and public services and facilities.

While the Replace Existing Hospital Buildings Only alternative would meet the project's primary objective to replace existing hospital buildings on the campus in accordance with seismic safety requirements of Senate Bill 1953 by 2030, this alternative would not meet any of the project's other objectives. Specifically, this alternative would not:

- Replace aging-buildings and utilities infrastructure through redevelopment of the Scripps Mercy Hospital Campus in a manner that promotes community wellness, healthcare, and technology in both its facilities and its site development.
- Maximize development intensity on the project site to allow for the optimal expansion of services to meet the needs of the community by providing patient centered, personalized, private care in the appropriate setting.
- Enhance the work environment and increase employment opportunities with expanded services offered.
- Promote a welcoming patient experience by ensuring ease of access and wayfinding efficiency and by establishing the medical campus as a destination for healthcare within the community.
- Establish an integrated campus of programs, facilities, and operations that serve the current community health care needs.
- Establish a Medical Office Building to house ambulatory services and programs designed to support hospital-based programs in a lower cost environment and provide growth opportunities as well as flexibility in meeting evolving outpatient needs.
- Improve campus access and circulation while minimizing transportation effects to adjoining neighborhoods.
- Improve transportation-related facilities including parking structures, transit, and passenger drop-off and pick-up areas in a way that allows for intuitive vehicular, biking, and patient-oriented access.
- Enhance the campus entry for patients, visitors, and employees, as well as the surrounding community.
- Separate facility supply delivery and support services access from patient, visitors and staff to enhance delivery of health care services on campus.

10.6 Environmentally Superior Alternative

The environmental analysis of alternatives presented above is summarized in Table 10-2, *Comparison of Alternatives to Project*. CEQA requires that the EIR identify the environmentally superior alternative among all of the alternatives considered, including the project. If the No Project alternative is selected as environmentally superior, then the EIR shall also identify an environmentally superior alternative among the other alternatives.

The Replace Hospital Buildings Only alternative would avoid the air quality (health risks) environmental impacts identified as significant for the project. This alternative would not avoid the noise (construction and operational) impacts associated with the project. Because the Replace Hospital Buildings Only alternative would avoid the air quality impact, this alternative could be considered the environmental superior alternative. While the Replace Hospital Buildings Only alternative would meet the project's primary objective to replace existing hospital buildings on the

campus for seismic safety in accordance with seismic safety requirements of Senate Bill 1953 by 2030, this alternative would not meet any of the project's other objectives.

Table 10-1. Replace Existing Buildings Alternative Compared to Proposed Project

Hospital Building	Proposed Project	Replace Hospital Building Only Alternative
College Building	40,700 sf	40,700 sf
Mercy Gardens	26,790 sf	26,790 sf
Chapel	5,920 sf	5,920 sf
Central Energy Plant	17,895 sf	17,895 sf
Parking Lot 12	223,842 sf	223,842 sf
Generator Building & Cooling Tower	555 sf	555 sf
Cancer & Parking Structure	119,293 sf	119,293 sf
6th Avenue Parking Structure & Bridge	439,513 sf	439,513 sf
Parking Lot 4.1	--	161,939 sf
Behavioral Health Clinic	--	--
550 Garage	--	--
550 Washington	--	--
Emergency Department	--	--
Hospital	--	--
Mercy Manor	--	16,668 sf
Facility Building	--	12,984 sf
Medical Office Building and Above Grade Parking Structure	276,000 sf	--
Hospital Support Building	67,000 sf	67,000 sf
Hospital I	631,000 sf	631,000 sf
Hospital II	380,000 sf	380,000 sf
Utility Yard	9,000 sf	--
Utility Yard	9,500 sf	--
Central Energy Plant Expansion	2,400 sf	--
TOTAL	2,249,408 sf	2,144,099 sf


 Indicates new hospital buildings that would be constructed.

Table 10-2. Comparison of Alternatives to Project

Environmental Issue Area	Project	No Project/No Build	Replace Existing Hospital Buildings Alternative
Land Use	Significant and unmitigated relative to Noise (operational).	Less than significant impact.	Less than significant.
Transportation and Circulation	Less than significant impact.	Less than significant impact.	Less than significant impact .
Visual Effects and Neighborhood Character	Less than significant impact.	No impact.	Less than significant impact.
Air Quality	Air quality health risk impacts due to construction (diesel emissions); mitigated to below a level of significance.	Less than significant impact.	Air quality health risk impacts due to construction (diesel emissions); can be mitigated to below a level of significance.
Historical Resources	Less than significant impact.	No impact.	Less than significant impact.
Noise	Construction noise impacts mitigated to below a level of significance; operational impacts significant and unmitigated.	Less than significant impact.	Construction noise impacts can be mitigated to below a level of significance; operational impacts avoided.
Greenhouse Gas Emissions	Less than significant impact.	Less than significant impact.	Less than significant impact.
Public Utilities	Less than significant impact.	Less than significant impact.	Less than significant impact.
Public Services and Facilities	Less than significant impact.	Less than significant impact.	Less than significant impact.
Cumulative Effects	Less than significant impact.	Less than significant impact.	Less than significant impact.

11.0 MITIGATION MONITORING AND REPORTING PROGRAM

CEQA, Section 21081.6, requires that a mitigation monitoring and reporting program (MMRP) be adopted upon certification of an EIR to ensure that the mitigation measures are implemented. The mitigation monitoring and reporting program specifies what the mitigation is, the entity responsible for monitoring the program, and when in the process it should be accomplished.

The EIR, incorporated herein as referenced, focuses on issues determined to be potentially significant by the City of San Diego. The issues addressed in the EIR include land use, transportation/circulation, visual effects and neighborhood character, air quality, historical resources, noise, greenhouse gas emissions, public utilities, and public services and facilities.

PRC section 21081.6 requires the monitoring of measures proposed to mitigate significant environmental effects. Issues related to land use (operational noise), biological resources, historical resources, noise, and tribal cultural resources, were determined to be potentially significant and require mitigation as described in this EIR. All impacts associated with these issue areas would be fully mitigated to below a level of significance with implementation of mitigation measures, with the exception of land use (operational noise) and noise (operational), which would remain significant and unmitigable.

The MMRP for the project is under the jurisdiction of San Diego and other agencies as specified below. The MMRP for the project addresses only the issue areas identified above as potentially significant. The following is an overview of the mitigation monitoring and reporting program to be completed for the project.

11.1 Monitoring Activities

Monitoring activities would be accomplished by individuals identified in the *Document Submittal/Inspection Checklist* table, below. Specific consultant qualifications will be determined by the City of San Diego.

11.2 Mitigation Measures

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. **PRE-CONSTRUCTION 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 the MITIGATION MONITORING COORDINATOR (MMC). Attendees must also include the Permit Holder's Representative(s), Job Site Superintendent and the following consultants:

Qualified Acoustician

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

CONTACT INFORMATION:

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

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

2. **MMRP COMPLIANCE:** This Project, Project Tracking System (PTS) Number 581984 and/or Environmental Document Number 581984, 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:

- N/A

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

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

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

DOCUMENT SUBMITTAL/INSPECTION CHECKLIST		
Issue Area	Document Submittal	Associated Inspection/Approvals/Notes
General	Consultant Qualification Letters	Prior to Preconstruction Meeting
General	Consultant Construction Monitoring Exhibits	Prior to or at Preconstruction Meeting
Noise	Acoustical Reports	Noise Mitigation Features Inspection
Bond Release	Request for Bond Release Letter	Final MMRP Inspections Prior to Bond Release Letter

C. SPECIFIC MMRP ISSUE AREA CONDITIONS/REQUIREMENTS

Air Quality

MM 5.4-1: Diesel Exhaust Emissions Reduction. During construction activities, efforts shall be made to reduce diesel exhaust emissions from all construction equipment greater than 100 hp with use of Tier 4 Interim or better equipment, including equipment with an installed DPF, where feasible, and by use of other emission reduction practices. Construction equipment that is certified less than Tier 4 Interim may only be used if unavailable from vendors, in which case equipment with DPFs installed shall be used whenever possible. Additionally, measures shall be employed to reduce DPM emissions, that may include, but would not be limited to, reduction in the number and/or horsepower rating of construction equipment, limiting the number of daily construction haul truck trips to and from the proposed project using cleaner vehicle fuel, and/or limiting the number of individual construction project components occurring simultaneously.

A qualified air quality monitor shall be on-site during grading and demolition phases to confirm that construction equipment greater than 100 hp employs Tier 4 Interim or better equipment and that construction equipment that is certified less than Tier 4 Interim is being used only where Tier 4 Interim equipment is unavailable from vendors. When such equipment is being used, such equipment shall be installed with DPFs whenever possible. The monitor shall also determine the need to be on-site during construction, if multiple construction equipment with larger engines is planned for use at the same time.

Noise

MM 5.6-1: Construction Noise. The following measures would be planned and reviewed by a qualified acoustic consultant to limit noise levels to meet requirements of the SDMC. These measures would be applied to all phases of the project site demolition and construction work.

- Ensure that all equipment items have the manufacturers' recommended noise abatement measures, such as mufflers, engine covers, and engine vibration isolators intact and operational.
- Turn off idling equipment, whenever possible.
- Construction activities shall be limited to daytime hours, 7 a.m. to 7 p.m. No noise generating construction activities shall take place on Sundays and holidays.
- Include in tenders, employment contracts, subcontractor agreements and work method statements clauses that assure the minimization of noise and compliance with directions from management to minimize noise.
- Give preference to the use quieter technology or other measures rather than lengthening construction duration (i.e. it is not recommended to lower noise by having fewer pieces of equipment running at a time thereby leading to extended construction duration).
- Regularly train workers and contractors (such as at toolbox talks) to use equipment in ways that minimize noise.
- Ensure that site managers periodically check the site, nearby residences and other sensitive receptors for noise problems so that solutions can be quickly applied.
- Keep truck drivers informed of designated vehicle routes, parking locations, acceptable delivery hours and other relevant practices (e.g. minimizing the use of engine brakes and periods of engine idling).
- Consider alternatives to diesel and gasoline engines and pneumatic units such as hydraulic or electric-controlled units where, feasible and reasonable.
- Examine and implement, where feasible and reasonable, alternatives to pile driving using a diesel hammer, such as hydraulic hammer, hydraulic press-in, or vibratory piledriver.
- To reduce the impact of backup alarms, examine and consider implementing, where feasible and reasonable, ambient sensitive back-up alarms, signal workers, turning circles and side loading/unloading trucks.
- To reduce the line-of-sight noise transmission to residences and other sensitive receptors, temporary noise barriers shall be erected as required prior to demolition of the Parking Lot 4.1, Behavioral Health Building, 550 Washington Street, Emergency Department, Existing Hospital, and Facility and Generator Building, and prior to construction of MOB, Hospital I, Hospital Support Building, and Mercy Manor.
 - Temporary noise barriers can be constructed from boarding (plywood boards, panels of steel sheeting or compressed fiber cement board) with no gaps between the panels at the site boundary. Stockpiles and shipping containers can also be used as effective noise barriers.
 - Planned barrier type, height, and placement shall be outlined in a Noise Report prepared by a qualified acoustic consultant at the time of issuance of building permits for the aforementioned buildings.
 - A qualified noise monitor shall be on-site in areas identified for noise barriers to ensure that noise levels are reduced to meet City standards.

12.0 REFERENCES

A list of the reference materials consulted in the course of the EIR's preparation is included in this section.

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.

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KPFF, *Storm Water Quality Management Plan (SWQMP)*. June 1, 2022.

Linscott, Law, and Greenspan, *Transportation Impact Analysis*. July 2022.

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13.0 INDIVIDUALS AND AGENCIES CONSULTED/ PREPARERS

This document has been prepared by the City of San Diego's Development Services Department. The EIR is based on independent analysis and determination made pursuant to the San Diego Land Development Code Section 128.0103.

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