TIERED MITIGATED NEGATIVE DECLARATION

THE CITY OF SAN DIEGO

Project No. 647676
SCH No. 2019060003

SUBJECT: **SCIENCE VILLAGE**: A COMMUNITY PLAN AMENDMENT to transfer development intensity rights (3,744 average daily trips or "ADT") from University Community Plan Area Subarea 37 (City Ownership) to newly created Subareas 102 and Subarea 10; REZONE to change the zoning from RS-1-14 (Residential--Single-Family Unit) to EMX-2 (Employment Mixed-Use); a GENERAL PLAN AMENDMENT, as the University Community Plan is a component of the City's General Plan Land Use and Community Planning Element; a SPECIFIC PLAN AMENDMENT to remove the project site from the Nexus Technology Centre Specific Plan; and a PLANNED DEVELOPMENT PERMIT for the demolition of three existing scientific research buildings totaling approximately 138,400 square feet; and the construction of two, four-story scientific research and development (R&D) buildings totaling approximately 369,878 square feet with associated accessory uses. The project would consist of approximately 310,416 square feet of R&D uses and 59,462 feet of accessory/amenity space. Additionally, three levels of subterranean parking with approximately 938 parking spaces are proposed. The approximately 3.97-acre site is located on three parcels which include 9363, 9373, and 9393 Towne Centre Drive. The site is designated as Industrial Employment per the General Plan and designated Scientific Research and zoned RS-1-14 in the University Community Plan. Additionally, the site is within the Airport Land Use Compatibility Overlay Zone (Marine Corps Air Station [MCAS] Miramar); the Airport Influence Area (MCAS Miramar-Review Area 1); the Federal Aviation Administration (FAA) Part 77 Noticing Area; Airport Noise Contours (MCAS Miramar-60-65 Community Noise Equivalent Level [CNEL]); the Community Plan Implementation Overlay Zone type A (CPIOZ-A); the Parking Impact Overlay Zone (Campus); the Parking Standards Transit Priority Area; Prime Industrial Lands; and the Transit Priority Area. (LEGAL DESCRIPTION: Lot 4 & 5 of Map No. 11876.) APPLICANT: Alexandria Real Estate

I. PROJECT DESCRIPTION:

See attached Tiered Initial Study.

II. ENVIRONMENTAL SETTING:

See attached Tiered Initial Study.

III. DOCUMENTATION:

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

IV. MITIGATION, MONITORING, AND REPORTING PROGRAM:

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

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

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

3. These notes must be shown within the first three (3) sheets of the construction documents in the format specified for engineering construction document templates as shown on the City website:

   https://www.sandiego.gov/development-services/forms-publications/design-guidelines-templates

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 MITIGATION MONITORING COORDINATION (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, it is also required to call **RE and MMC at 858-627-3360**

2. **MMRP COMPLIANCE:** This Project, Project Tracking System (PTS) No. 647676 and /or Environmental Document No. 647676, shall conform to the mitigation requirements contained in the associated Environmental Document and implemented to the satisfaction of the DSD's Environmental Designee (MMC) and the City Engineer (RE). The requirements may not be reduced or changed but may be annotated (i.e. to explain when and how compliance is being met and location of verifying proof, etc.). Additional clarifying information may also be added to other relevant plan sheets and/or specifications as appropriate (i.e., specific locations, times of monitoring, methodology, etc.

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

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

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

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

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

DOCUMENT SUBMITTAL/INSPECTION CHECKLIST		
Issue Area	Document Submittal	Associated Inspection/Approvals/Notes
General	Consultant Qualification Letters	Prior to Preconstruction Meeting
General	Consultant Construction Monitoring Exhibits	Prior to or at Preconstruction Meeting
Bond Release	Request for Bond Release Letter	Final MMRP Inspections Prior to Bond Release Letter

C. SPECIFIC MMRP ISSUE AREA CONDITIONS/REQUIREMENTS

NOISE

MM NOI-1 Prior to issuance of any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits or a Notice to Proceed for Subdivisions, but prior to the first preconstruction meeting, whichever is applicable, the Development Services Department Environmental Designee shall verify that the requirements for the following noise control measure have been noted on the applicable construction documents through the plan check process:

To reduce construction noise, a temporary noise barrier or enclosure shall be installed prior to the initiation of demolition and maintained through the end of construction along the eastern and southern property lines to break the line of sight between the construction equipment and the adjacent residences. The MMC or RE shall verify the temporary noise barrier is installed to the specifications below prior to the initiation of demolition activities. The temporary noise barrier shall have a sound transmission class of 20 or greater in accordance with American Society for Testing and Materials Test Method E90, or at least 2 pounds per square foot to ensure adequate transmission loss characteristics. In order to achieve this, the barrier may consist of 3-inch steel tubular framing, welded joints, a layer of 18-ounce tarp, a 2-inch-thick fiberglass blanket, a half-inch-thick weatherwood asphalt sheathing, and 7/16-inch sturdy board siding with a heavy duct seal around the perimeter. The length, height, and location of noise control barrier walls shall be adequate to assure proper acoustical performance. To avoid objectionable noise reflections, the source side of the noise barrier shall be lined with an acoustic absorption material meeting a noise reduction coefficient rating of 0.70 or greater in accordance with American Society for Testing and Materials Test Method C423. All noise control barrier walls shall be designed to preclude structural failure due to such factors as winds, shear, shallow soil failure, earthquakes, and erosion.

TRANSPORTATION/CIRCULATION

MM TR-1 Prior to issuance of occupancy permits for any new on-site buildings, the project shall demonstrate the following Vehicle Miles Traveled (VMT) Reduction Measures have been implemented to achieve a 10.5 point reduction in accordance with Mobility Choices Regulations (San Diego Municipal Code Chapter14, Article 3, Division 11), Appendix T Mobility Choices Regulations: Implementation Guidelines. Implementation of these measures would minimize VMT impacts to the extent feasible.

- Provide short-term bicycle parking spaces that are available to the public, at least 10% beyond minimum requirement.
- Provide long-term bicycle parking spaces, at least 10% beyond minimum requirement.
- Provide on-site bicycle repair station offering a minimum of an air pump and basic repair and maintenance tools for bicycles.
- Provide on-site multi-modal kiosks (above minimum kiosk requirement to serve a larger site).

V. PUBLIC REVIEW DISTRIBUTION:

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

Federal
MCAS Miramar Air Station (13)

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

City of San Diego
Mayor's Office (91)
Councilmember Kent Lee, District 6 (MS10A)
Mitigation, Monitoring, and Coordination (MS 1102B (77A)
City Attorney's Office
Development Services:
Development Project Manager
LDR Engineering
LDR Environmental
LDR Geology
LDR Landscaping
LDR Planning Review

LDR Transportation
Environmental Services Department
PUD Water and Sewer
Planning Department:
Plan-Long Range
Plan-MSCP
Fire-Rescue Department
San Diego Police Department
Transportation Development - DSD (78)
Development Coordination (78A)
Fire and Life Safety Services (79)
San Diego Fire – Rescue Department Logistics (80)
University City Community Branch Library (81JJ)
North University Branch Library (81JJJ)

Other Interested Organizations, Groups, and Individuals
Historical Resources Board (87)
Carmen Lucas (206)
South Coastal Information Center (210)
San Diego Archaeological Center (212)
Save Our Heritage Organization (214)
Ron Christman (215)
Clint Linton (215B)
Frank Brown – Inter-Tribal Cultural Resources Council (216)
Campo Band of Mission Indians (217)
San Diego County Archaeological Society, Inc. (218)
Kumeyaay Cultural Heritage Preservation (223)
Kumeyaay Cultural Repatriation Committee (225)
Native American Distribution (225 A-S)
University City Community Planning Group (480)
Editor, Guardian (481)
Robert Clossin, UCSD Physical & Community Planning (482)
Commanding General, Community Plans Liaison MCAS Miramar Air Station (484)
Marian Bear Natural Park Recreation Council (485)
Friends of Rose Canyon (487)
University City Library (488)
La Jolla Village Community Council (489)
Rachel B. Hooper / Deborah L. Keeth, Shute Mihaly & Weinberger LLP (490)
Chamber of Commerce (492)
Clint Linton, Iipay Nation of Santa Ysabel
Lisa Cumper, Jamul Indian Village
John Stump
Richard Drury, Lozeau Drury LLP
Molly Greene, Lozeau Drury LLP
Kevin Johnston
Komal Toor, Lozeau Drury LLP
Stacey Oborne Lozeau Drury LLP

Lozeau Drury LLP

VI. RESULTS OF PUBLIC REVIEW:

☐ No comments were received during the public input period.

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

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

Copies of the tiered environmental document and associated project-specific technical appendices, if any, may be accessed on the City of San Diego's California Environmental Quality Act (CEQA) webpage at https://www.sandiego.gov/ceqa. For reference, the Complete Communities: Housing Solutions and Mobility Choices Program EIR document with associated appendices may be examined at https://www.sandiego.gov/ceqa/final.

Dawna Marshall
Senior Planner
Development Services Department

May 9, 2023
Date of Draft Report

Date of Final Report

Analyst: M. Dresser

Attachments:

Tiered Initial Study Checklist
List of Acronyms
Figure 1 - Regional Vicinity
Figure 2 - Local Vicinity
Figure 3 - Site Plan

TIERED INITIAL STUDY CHECKLIST

1 INTRODUCTION

1.1 Tiered Initial Study

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

1.2 Tiering Process

This environmental analysis is a Tiered Initial Study for the proposed Science Village project (referred to as the "proposed project" or "project" throughout this document). This environmental analysis is tiered from the *Complete Communities: Housing Solutions and Mobility Choices Program EIR* in accordance with Sections 15152 and 15168 of the CEQA Guidelines and Public Resources Code Section 21094. The Complete Communities: Housing Solutions and Mobility Choices Program EIR was prepared pursuant to Section 15168 of the CEQA Guidelines and is incorporated by reference pursuant to Section 15152 of the CEQA Guidelines. The Complete Communities: Housing Solutions and Mobility Choices Program EIR document with associated appendices may be examined at https://www.sandiego.gov/ceqa/final.

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

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

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

1.3 Appropriateness of a Tiered Initial Study

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

2 PROJECT INFORMATION

2.1 Project title/Project number:
Science Village CPA/PDP / Project No. 647676

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

2.3 Contact person and phone number:
Morgan Dresser / (619) 446-5404

2.4 Project location:
9363, 9373, and 9393 Towne Centre Drive, San Diego, California 92121

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

2.6 General/Community Plan designation:
General Plan: Industrial Employment, Prime Industrial / Community Plan: Scientific Research

2.7 Zoning:
RS-1-14 (Residential--Single-Family Unit)

2.8 Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):
None required

3 PROJECT DESCRIPTION

3.1 Environmental Setting and Surrounding Land Uses

The approximately 3.97-acre site is located on three parcels which include 9363, 9373, and 9393 Towne Centre Drive, between Eastgate Mall and Executive Drive in San Diego, California. La Jolla Village Drive is located approximately 1,000 feet to the south of the project site. Regional access to the project area is provided via Interstate 805 (I-805) approximately 1 mile to the east and Interstate 5 (I-5) approximately 2 miles to the west (see Figure 1, Regional Vicinity). The project site is located within the City of San Diego's University Community Plan Area. The County Assessor's Parcel Numbers (APNs) for the project site are 345-200-04 and -05.

The site is designated as Industrial Employment per the General Plan and designated Scientific Research and zoned RS-1-14 in the University Community Plan. The site is within University Community Plan Area Subarea 37.

Additionally, the project site is within the Airport Land Use Compatibility Overlay Zone (Marine Corps Air Station [MCAS] Miramar, the Airport Influence area (MCAS Miramar-Review Area 1), the Federal Aviation Administration (FAA) Part 77 Noticing Area, Airport Noise Contours (MCAS Miramar-60-65 Community Noise Equivalent Level [CNEL]), the Community Plan Implementation Overlay Zone type A (CPIOZ-A), the Parking Impact Overlay Zone (Campus), the Parking Standards Transit Priority Area, Prime Industrial Lands and the Transit Priority Area.

The area surrounding the project site is highly developed and urbanized with a variety of land uses such as light industrial, scientific/clinical research, medical, and general office uses. Commercial uses are located immediately adjacent to the west and south. The University of California, San Diego campus is located farther west. Additionally, residential uses are located approximately 0.2 miles to the southwest. The Westfield University Town Center shopping center is located approximately 0.3 miles to the southwest. Additionally, the trolley line operated by the San Diego Metropolitan Transit Service (MTS) runs generally north–south in the vicinity of the site along Genesee Avenue, approximately 0.4 miles to the west. The site includes three existing scientific R&D buildings that are connected below grade by one level of subterranean parking. Access to the existing parking garage is provided from one two-way right-in/right-out only driveway along Executive Drive and from a ramp within the on-site surface parking lot which is accessed via one two-way right-in/right-out only driveway along Town Centre Drive (see Figure 2, Local Vicinity).

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

A GENERAL PLAN AMENDMENT, COMMUNITY PLAN AMENDMENT, SPECIFIC PLAN AMENDMENT, REZONE, and PLANNED DEVELOPMENT PERMIT for the demolition of three scientific research buildings totaling approximately 138,400 square feet; and the construction of two (2) four-story scientific R&D buildings totaling approximately 369,878 square feet. The project would consist of approximately 310,416 square feet of Research and Development uses and 59,462 feet of accessory/amenity space. The accessory/amenity space would consist of a 7,655 square foot market, 563 square foot food and beverage space, 23,397 square foot fitness center, and 27,847 square foot of conference space(s).

Additionally, 3 levels of subterranean parking with approximately 938 parking spaces are proposed.

The project proposes a Community Plan Amendment to transfer development intensity rights (3,744 average daily trips or "ADT") from University Community Plan Area Subarea 37 (City Ownership) to newly created Subarea 102 and Subarea 10 as follows: 1,933 ADT transferred to new Subarea 102 (project site), which would allow an additional 241,600 square feet of scientific research/R&D; and 1,811 ADT transferred to Subarea 10 (Alexandria, Campus Point), which would allow an additional 226,400 square feet of scientific research/R&D space. A General Plan Amendment is required as revisions are proposed to the University Community Plan, which is a component of the General Plan Land Use and Community Planning Element. Additionally, the project proposes a rezone to change the zoning from RS-1-14 (Residential--Single-Family Unit) to EMX-2 (Employment Mixed-Use), which is consistent with and would implement the Scientific Research use designation and Prime Industrial identification.

TABLE 3-1. BUILDING USE SUMMARY

	Use by Building	Square Footage of Proposed Use
Existing Buildings (to be Demolished)	Scientific Research and Development	138,400
	Total	**138,400**
Proposed Buildings	Scientific Research and Development	310,416
	Secondary Uses	
	Food and Beverage	*563*
	Retail/Market	*7,655*
	Fitness Center	*23,397*
	Conference Space	*27,847*
	Subtotal	**59,462**
	Total	**369,878**

As mentioned above, the requested project entitlements/discretionary actions required by the City include a General Plan Amendment, Specific Plan Amendment to the Nexus Technology Centre Specific Plan, Planned Development Permit, a rezone, and a Community Plan Amendment to the University Community Plan, as detailed below.

- Specific Plan Amendment – A Specific Plan Amendment would be required to remove the project site from the Nexus Technology Centre Specific Plan. The project site is composed of Lots 7 and 8 in the Nexus Specific Plan. The amendment would remove Lots 7 and 8 from the Nexus Specific Plan and any applicable development regulations and rezone the property to the EMX-2 (Employment Mixed-Use) zone; see Rezone below. The amendment would allow for additional development intensity on-site due to the proposed expansion of land uses and building square footage.

- Rezone – A rezone would be required to redesignate the property from RS-1-14 (Residential--Single-Family Unit) to EMX-2 (Employment Mixed-Use) as the existing RS-1-14 zone does not allow for the proposed Scientific Research Community Plan land use. Rezoning to EMX-2 would allow the project to be consistent with the City's Scientific Research use designation and Prime Industrial identification by allowing for a variety of employment-focused uses.

- General Plan Amendment – A General Plan Amendment would be required relative to the revisions proposed to the University Community Plan. The General Plan currently designates the project site for "Industrial Employment" and Prime Industrial Lands. The proposed project would not change the existing Scientific Research use designation or Prime Industrial classification, and no changes to the text or figures in the General Plan Land Use and Planning Element, including the General Plan land use map, are required or proposed with the General Plan Amendment.

- Community Plan Amendment – A Community Plan Amendment to the University Community Plan would be required to allow for increased development intensity of the project site. The amendment would also entail a revision of the “Commercial Encroachment” provisions of the Industrial Element of the Community Plan to allow the proposed commercial uses to serve the surrounding community and for the redesignation of the southern portion of Subarea 37 (south of Nobel Drive) from Scientific Research to “Open Space.”

- Planned Development Permit – A Planned Development Permit is required for project implementation to allow for the demolition of three existing scientific research buildings totaling approximately 138,400 square feet; and the construction of two (2) four-story scientific R&D buildings totaling approximately 369,878 square feet with associated accessory uses.

The proposed improvements are illustrated in Figure 3A, Site Plan; 3B, Zoning Plan; and Figure 3C, Zoning Plan - Parking.

Per the San Diego Municipal Code (SDMC), a total of 769 parking spaces is required. Of these, a minimum of 6 percent (57 spaces) is required to be allocated for Electrical Vehicle Charging (EVCS) per CALGreen mandatory measures. Half of those spaces, 3 percent (29 spaces), would be required with a listed cabinet, box or enclosure connected to a conduit linking parking spaces with electrical service for future installation of electric vehicle supply equipment (EVSE). However, the project proposes to satisfy the Voluntary CALGreen Tier 2 requirements by providing 188 EVCS (20% of 938 total spaces provided). A minimum of 10% (or 77 designated parking spaces) would be required for low-emitting, fuel-efficient, and carpool/vanpool vehicles. The project would provide the required spaces to meet the CALGreen Tier 2 voluntary measure of 22% (or 207) of total parking spaces which will include a combination of low-emitting, fuel-efficient, carpool/vanpool vehicles and EVCS spaces per CALGreen 2019 with the July 2021 supplement.

The City's Municipal Code requires that the project provide 47 short-term and 47 long-term bicycle parking spaces. The project would exceed the minimum requirement by providing 60 short-term spaces at the Level P1 main building entrance at the southwest corner and at the north plaza on Level 1 as well as 61 long-term secure spaces inside the building at the bike storage room on Level P1.

Bike lockers and shower facilities would be provided on-site consistent with the City of San Diego Climate Action Plan (CAP) in accordance with voluntary measures under CALGreen.

Bicycle repair stations that offer basic repair and maintenance tools would also be provided on-site.

It is anticipated that employees would generally occupy the on-site buildings during typical working hours (i.e., 7:00 a.m. to 6:00 p.m.) on a daily basis; however, extended hours would likely occur to some degree based upon specific tenant needs. As the project would encourage tenants/employees to telecommute and to implement alternative work schedules to reduce the number of back-and-forth trips, it is anticipated that employees may be on-site outside of typical working hours.

Other uses proposed with the development, such as the market and food and beverage space, would mainly be utilized by project tenants/employees. However, such amenities would also be available to guests and visitors.

The project would be served by the City's public water system via connection to existing pipelines in Executive Drive and Towne Centre Drive. The project proposes improvements to the City's sewer system to ensure that it would operate at design criteria and would connect to an existing sewer line located in Executive Drive.

The project includes a drainage network designed to control and filter stormwater runoff in conformance with requirements of the San Diego Regional Water Quality Control Board (RWQCB) and the City of San Diego. As designed, the project would incorporate on-site underground storage vaults with modular wetland systems for stormwater treatment. The majority of runoff from the proposed parking structure would be collected from the roof of the structure. Proposed storm drains around the site perimeter would collect the remaining runoff which would confluence with the rooftop runoff and flow through an on-site vault and water quality treatment facility (modular wetland units) at the southeast corner of the property, then exit the site to the public storm drain located in Executive Drive, consistent with the existing condition.

Project construction is anticipated to occur over an approximate 47-month time frame (approximately 4 years) from the onset of demolition through final construction. It is anticipated that the work would be completed in 8- or 10-hour shifts, with a total of five shifts per week (Monday-Friday). Per City Municipal Code Section 59.5.0404, construction would be limited to the hours between 7:00 a.m. and 7:00 p.m. daily (except Sundays and legal holidays). All construction activities shall be prohibited at night (between 7:00 p.m. and 7:00 a.m.). Overtime and weekend work, if required, would be limited to Saturday during permitted hours as necessary to meet scheduled milestones or accelerate the schedule and would comply with all applicable City ordinances.

Demolition of the existing buildings on-site is anticipated to take approximately 5 months. Demolition would be accomplished with cranes, dozers, and other heavy equipment. Waste materials would be uploaded onto large trucks using small cranes, forklifts, and other construction equipment as needed. Demolition equipment would be delivered to the site on low-bed trucks unless the equipment can be driven to the site (e.g., on boom trucks).

Project grading would require a total cut of approximately 315,000 cubic yards, and a total fill of approximately 100 cubic yards Therefore, approximately 314,900 cubic yards of soil would be exported off-site and disposed of at a licensed facility. Grading would be accomplished with scrapers, motor graders, water trucks, dozers, and compaction equipment. Building materials would be off-loaded and installed using small cranes, boom trucks, forklifts, rubber-tired loaders, rubber-tired backhoes, and other small- to medium-sized construction equipment as needed. Construction equipment would be delivered to the site on low-bed trucks unless the equipment can be driven to the site (e.g., on boom trucks). Existing on-site vegetation would be removed to allow for construction of the proposed development.

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

Pursuant to the requirements of Senate Bill 18 (SB 18), which requires tribal notification prior to the adoption or amendment of a city or county's general plan, the City provided written notice of the proposed project to relevant Native American tribes on April 13, 2020. Additionally, in accordance with the requirements of Public Resources Code 21080.3.1, the City of San Diego provided formal notifications to the Iipay Nation of Santa Ysabel and the Jamul Indian Village, which are traditionally and culturally affiliated with the project area, requesting consultation on April 13, 2020. Both the Jamul Indian Village and Iipay Nation of Santa Ysabel Native American Tribes responded within the notification period, concurring with staff's determination. Therefore, the consultation process was concluded.

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

4 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

5 DETERMINATION (To be completed by Lead Agency)

On the basis of this initial evaluation:

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

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

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

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

6 EVALUATION OF ENVIRONMENTAL IMPACTS

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

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

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

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

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

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

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

7. The discussion in each issue should include the following:
    - Discussion of *Complete Communities: Housing Solutions and Mobility Choices Program EIR* impact (direct and cumulative) conclusions
    - Discussion of potential project impacts
    - Applicable *Complete Communities: Housing Solutions and Mobility Choices Program EIR* mitigation measures assumed in the project
    - Significance determination after *Complete Communities: Housing Solutions and Mobility Choices Program EIR* mitigation measures
    - Additional project-level mitigation measures
    - Significance determination after all mitigation

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

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

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

Under existing conditions, the project site is designated as Industrial Employment per the General Plan, and designated as Scientific Research and zoned RS-1-14 in the University Community Plan. The site is currently developed and supports similar R&D uses totaling approximately 138,400 square feet, connected below grade by one level of subterranean parking. As the project would result in development of the site with similar scientific R&D uses totaling approximately 369,878 square feet, along with accessory/amenity space and 3 levels of subterranean parking, the proposed land use and zoning changes, as described in greater detail below, would not result in a substantial change in use as compared to existing site conditions.

Nexus Specific Plan

A Specific Plan Amendment would be required to remove the project site (Lots 7 and 8) from the Nexus Technology Centre Specific Plan. The proposed amendment would remove Lots 7 and 8 from the Nexus Specific Plan and any applicable development regulations and rezone the property to the EMX-2 (Employment Mixed-Use) zone. The existing Specific Plan allows for 138,400 of building square feet on the project site and provides various form and design requirements for all properties in the 22-acre plan area. The amendment would allow for additional development intensity on-site due to the proposed expansion of land uses and building square footage. This action would not result in a conflict with any land use plan or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

City of San Diego General Plan

As noted above, the project site currently supports three existing buildings utilized for scientific research purposes. The General Plan designates the site for "Industrial Employment" and identifies it as Prime Industrial Lands. The project would not change the Scientific Research use designation or Prime Industrial classification, and the proposed R&D uses would be consistent with the Prime Industrial General Plan designation. The project would implement the goals and policies of the General Plan Economic Prosperity Element through support of Base Sector Industrial Uses. The project would increase the floor area of these uses consistent with the goals of the General Plan and make better use of the limited prime industrial lands and the extension of the Blue Line trolley line and transit stations in the area. Further, the project does not represent a land use that would adversely affect or conflict with area occupants or other existing commercial, office, light industrial, or office uses or that would otherwise expose sensitive receptors to substantial noise levels or hazardous conditions. The project is consistent with relevant elements of the City's General Plan and would not cause a significant environmental impact resulting from inconsistency with the General Plan. Overall, the project is consistent with General Plan land use anticipated for the site. Refer also to Table 6.1-1A, Project Consistency with City General Plan, below.

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

Zoning

Additionally, a rezone would be required to redesignate the property from RS-1-14 (Residential--Single-Family Unit) to EMX-2 (Employment Mixed-Use) as the existing RS-1-14 zone does not allow for the proposed Scientific Research Community Plan land use. Per Section 131.0704 of the City's Municipal Code, the purpose of the EMX zones is to provide for a broad mix of uses, including office, research and development, industrial, and retail; non-residential use is to be the primary use. Development that contains a research and development use within Prime Industrial Land identified in the land use plan does not require a secondary use. Rezoning the site to EMX-2 would allow the project to be consistent with the City's University Community Plan designation of Scientific Research and General Plan Prime Industrial designation by allowing for a variety of employment-focused uses.

University Community Plan

The site is designated as Scientific Research in the University Community Plan. The project proposes a Community Plan Amendment to the University Community Plan to allow for increased development intensity of the project site. The amendment would also entail a revision of the "Commercial Encroachment" provisions of the Industrial Element of the Community Plan to allow the proposed commercial uses to serve the surrounding community.

The proposed project would transfer development intensity rights (3,744 ADT) from University Community Plan Area Subarea 37 (City Ownership) to newly created Subarea 102 and Subarea 10 as follows: 1,933 ADT transferred to new Subarea 102 (project site), which would allow an additional 241,600 square feet of scientific research/R&D; and 1,811 ADT transferred to Subarea 10 (Alexandria, Campus Point), which would allow an additional 226,400 square feet of scientific research/R&D space. The proposed amendment to the Community Plan would redesignate the southern portion of Subarea 37 (south of Nobel Drive) from Scientific Research to Open Space. The southern portion of Subarea 37, though designated Scientific Research, is precluded from development due to existing conservation easements. The transfer from Subarea 37 to Subareas 102 and 10 would allow development of additional Scientific Research uses that otherwise would not be realized, and the proposed amendment would designate the southern portion of Subarea 37 to Open Space to align with the existing conservation easements. The project would not adversely affect the applicable land use plan since the increase in development intensity is accommodated by the community plan amendment, planned development permit, and ADT transfer from Subarea 37.

The proposed amendment to the Community Plan would not adversely affect any environmental resources, and would not result in a significant environmental impact as the result of conflict with any Community Plan goals or policies adopted for the purpose of avoiding or mitigating an environmental effect in this regard. Table 6.1-1B, Project Consistency with University Community Plan, below provides a summary of project consistency with relevant goals and policies identified in the University Community Plan.

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

TABLE 6.1-1A. PROJECT CONSISTENCY WITH CITY GENERAL PLAN

Goal	Summary of Project Consistency
Land Use and Community Planning Goals	
Land use categories and designations that remain consistent with the General Plan Land Use Categories as community plans are updated and/or amended.	The General Plan designates the site for "Industrial Employment" and identifies it as Prime Industrial Lands. Although a General Plan Amendment is required, the project would not change the existing Scientific Research use designation or Prime Industrial classification, and the proposed R&D uses would be consistent with the Prime Industrial General Plan designation. Overall, the project is consistent with General Plan land use anticipated for the site. Additionally, the project proposes a Community Plan Amendment to transfer development intensity rights (3,744 average daily trips or "ADT") from University Community Plan Area Subarea 37 (City Ownership) to newly created Subarea 102 and Subarea 10 as follows: 1,933 ADT transferred to new Subarea 102 (project site), which would allow an additional 241,600 square feet of scientific research/R&D; and 1,811 ADT transferred to Subarea 10 (Alexandria, Campus Point), which would allow an additional 226,400 square feet of scientific research/R&D space. Such amendments are considered to be consistent with the General Plan and with the City's intended use of the subject property.
Community plans that are kept consistent with the future vision of the General Plan through comprehensive updates or amendments.	Refer to above response.
Approve plan amendments that better implement the General Plan and community goals and policies.	Refer to above response.
Protection of the health, safety, and welfare of persons within an airport influence area by minimizing the public's exposure to high levels of noise and risk of aircraft accidents.	The project site is located within Federal Aviation Administration (FAA) Part 77 Noticing Area for the MCAS Miramar Airport Land Use Compatibility Plan (ALUCP) and is required to obtain an FAA Part 77 Notice of Determination Letter. However, consistent with FAA allowances, the project applicant has completed self-certification of the project. A note has been added to the improvement plans to indicate that the City does not require notification to the FAA if a professional, licensed by the state of California to prepare construction documents, provides a certification on the plans along with their registration and stamp and signature, as allowed per Section 77.15(A) of Title 14 of the Code of Federal Regulations CFR Part 77. Additionally, the project is required to obtain a determination of consistency from the San Diego County Regional Airport Authority, which acts as the Airport Land Use Commission (ALUC) for San Diego County. A letter was received from the County ALUC on May 2, 2022 indicating that the site lies within the Airport Influence Area (AIA) for the Marine Corps Air Station (MCAS) Miramar Airport Land Use Compatibility Plan (ALUCP). The letter indicated that the ALUC had reviewed the project and determined that, in accordance with the San Diego Regional Airport Authority Policy 8.30 and applicable provisions of the State Aeronautics Act (Cal. Pub. Util. Code §21670-21679.5), the project is conditionally consistent with the MCAS Miramar ALUCP, based upon the findings summarized in the letter. Therefore, the project has been designed in accordance with relevant height and safety regulations pertaining to airport operations and is in conformance with allowed use of the subject site; refer to Appendix A for a copy of the determination letter. Refer also to response below under Noise Goals.

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

TABLE 6.1-1A, CONTINUED

Goal	Summary of Project Consistency
Mobility Goals	
A complete, functional, and interconnected pedestrian network, that is accessible to pedestrians of all abilities.	The project is located in an area with established pedestrian and public transit networks within proximity to the site. The project would provide linkages to such systems via proposed non-contiguous sidewalks and the off-site pedestrian network (contiguous sidewalks and marked crosswalks).
Increased transit ridership.	The site is located within one half mile walking distance of several transit stops, allowing access and linkage to local and regional transit systems. Refer to above response regarding pedestrian network to the existing transit stops.
Expanded travel options and improved personal mobility.	The project would provide a minimum of 10% (or 77 designated parking spaces) for low-emitting, fuel-efficient, and carpool/vanpool vehicles, thereby encouraging shared ride transportation. The project would also provide a transportation demand management program for employees that would include unbundled parking, maintaining an employer network in the San Diego Association of Governments' (SANDAG) iCommute Program, flexible or alternative work hours, and access to services that reduce the need to drive, to further promote the use of alternative means of transportation.
A safe and comprehensive local and regional bikeway network.	The project proposes removal of existing on-street parking to provide a buffered Class II bike lane along Towne Centre Drive from Executive Drive to Eastgate Mall and a Class IV one-way cycle track along Executive Drive from Towne Centre Drive to Judicial Drive with green conflict striping at all driveways. Additionally, the project would provide on-site bike parking, lockers, and showers to encourage use of bicycle mode.
Urban Design Goals	
A pattern and scale of development that provides visual diversity, choice of lifestyle, and opportunities for social interaction.	The project has been designed in accordance with applicable design regulations of the proposed zone to visually enhance the structures and affected site for use by future employees and visitors alike. The accessory/amenity space would consist of a market, food and beverage space, fitness center, and conference space(s), as well as common seating areas, allowing for social interaction and active and passive recreation.
Utilization of landscape as an important aesthetic and unifying element throughout the City.	The project would incorporate landscaping consistent with City landscaping requirements and as illustrated on the Conceptual Landscape Plan prepared for the project. Such landscaping is intended to enhance the appearance of the site and visually blend the development into the surrounding community.
Promote the enhanced visual quality of office and industrial development.	Refer to above responses under Urban Design Goals.
Provide increased pedestrian and transit orientation within office and industrial developments.	Refer to above responses under Mobility Goals.
Economic Prosperity Goals	
A City with sufficient land capacity for base sector industries to sustain a strong economic base.	The project would result in redevelopment of the subject site with scientific R&D uses that would allow for job creation and retention, and lead to enhanced local economic development opportunities in the area. The project would support the trend, as noted in the General Plan, away from the production and assembly of physical goods and toward the provision of services and the production of intellectual property, offering long term growth potential.
Efficient use of existing employment lands.	Refer to above response.

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

TABLE 6.1-1A, CONTINUED

Goal	Summary of Project Consistency
A City with an increase in the number of quality jobs for local residents including middle-income employment opportunities and jobs with career ladders.	Refer to the above responses. The project will provide the opportunity for high technology companies to locate in the area which, as stated in the General Plan, has successfully created higher income employment opportunities for local residents and attracted others from outside of the region seeking such employment. The project would facilitate expansion of high technology business facilities that would also have the potential to offer middle-income jobs likely to be filled by local residents and others, and have been found to have favorable long term growth potential.
A City bale to retain, attract, and maintain the type of businesses likely to contribute positively to the local economy. There industries contribute to diverse economic base, maintain environmental quality, and provide high quality employment opportunities.	Refer to above responses.
Conservation Goals	
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.	Energy-saving features incorporated into the proposed development are anticipated to include drought-tolerant landscaping; low water and recycled water irrigation systems; installation of a solar-ready roof; and energy-saving lighting, mechanical systems, and low-flow plumbing fixtures and fittings. The project would be designed to meet or exceed requirements of the California Green Building Code (CALGreen; CCR Title 24, Part 11) and would achieve LEED Gold certification. Additionally, transportation-related sustainability features would include such measures as the provision of on-site bike racks and bike lockers/storage; shower facilities; electric vehicle charging stations (EVCS); promotion of alternative transportation programs; and carpool priority parking.
Reduction in greenhouse gas emissions effecting climate change.	Refer to above response.
Noise Goals	
Consider existing and future noise levels when making land use planning decisions to minimize people's exposure to excessive noise.	The project site is located within the 60-65 community noise equivalent level (CNEL) noise contour of the 2020 MCAS Miramar Air Installations Compatible Use Zones (AICUZ) Update. The site is subject to multiple flight corridors and will experience overflight and noise from operations. However, the U.S. Marine Corps has provided written correspondence to the City indicating that the project as proposed is consistent with AICUZ noise criteria; refer to Appendix A. The project would implement mitigation (mitigation measure NOI-1) to reduce potential construction noise impacts to less than significant. Due to the nature of the proposed use, the project would not result in significant noise impacts from operational activities, Significant impacts due to vehicle traffic or stationary noise sources would not occur. Additionally, the project would be consistent with the City's General Plan Noise Element Table 3, City of San Diego Land Use Compatibility for Community Noise Environments, that identifies a 50 dBA CNEL exterior noise level for industrial uses (including light manufacturing) and a 50 dBA CNEL exterior noise level for office uses. As demonstrated in the analysis provided in Section 6.10, Noise, of this IS/MND, project operations would not exceed such noise level thresholds; refer also to Appendix G, Acoustical Assessment, for additional discussion. Thus, the proposed uses would minimize and avoid adverse noise impacts.
Minimal excessive aircraft-related noise on residential and other noise-sensitive land uses.	Refer to above response.

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

TABLE 6.1-1B. PROJECT CONSISTENCY WITH UNIVERSITY COMMUNITY PLAN

Goal	Summary of Project Consistency
Urban Design Goals	
Improve accessibility and use relationships within the community by establishing well-defined, multi-modal linkage systems.	To encourage tenants/employees to walk to and from the site, the project has been designed to provide pedestrian connectivity via a pedestrian access network that would link to existing off-site external streets and pedestrian facilities (i.e., sidewalks) contiguous with the project site. There are multiple cafes, commercial stores, banks, post offices, restaurants, and gyms within 1,320 feet (one-quarter mile) of the project site. The pedestrian network would also provide access to local transit that would link to the larger regional transportation system. Currently, there are three existing major transit stops located within a half mile from the project site, as listed below. These transit stops offer access to bus service operated by the San Diego Metropolitan Transit Service (MTS). • Northwest corner of La Jolla Village Drive/Towne Centre Drive • Southeast corner of La Jolla Village Drive/Executive Way • Northwest corner of La Jolla Village Drive/Executive Way Additionally, the MTS operates the City's light rail transit system (San Diego Trolley). The UC San Diego Blue Line was recently extended to the University community, with the nearest stop approximately 0.45 mile walking distance west of the Executive Drive Station, located along Genesee Avenue, south of Executive Drive.
Ensure that every new development contributes to the public realm and street livability by providing visual amenities and a sense of place.	The project also proposes a small outdoor plaza in the southwest portion of the site near the market/food and beverage uses that would be available for public use. The plaza is intended to support passive and active recreation (gathering, eating, walking, etc.) and engage interest at the pedestrian/street level; refer to Figure 5B, Conceptual Elevation, which illustrates this outdoor space. Additionally, the project would include additional amenities for passive recreation for employee use, including a market, food and beverage space, and an open atrium/plaza with gardens for gathering and interaction.
Transportation Goals	
Provide a network of transportation systems that are integrated, complementary and compatible with other citywide and regional goals. The network should take into account the physical, social, economic and environmental conditions of the community, both present and future.	Refer to the first response under Urban Design Goals, above. The project is located in a highly urbanized area with established pedestrian and public transit networks within proximity to the site. The project would provide linkages to such systems via the off-site pedestrian network (sidewalks and crosswalks). The project has been designed to provide pedestrian connectivity via a pedestrian access network that would link to existing off-site external streets and pedestrian facilities contiguous with the project site. Additionally, the project would provide on-site bike parking, lockers, and showers to encourage use of such modes of transit. The site is also located within one half mile of several transit stops, allowing access and linkage to local and regional transit systems. The project would also offer a minimum of 10% (or 77 designated parking spaces) for low-emitting, fuel-efficient, and carpool/vanpool vehicles, thereby encouraging shared ride transportation. Employees would also be encouraged to participate in the San Diego Association of Governments' (SANDAG) iCommute Program (or equivalent) to further promote the use of alternative means of transit.
Provide a balanced public transportation system to link the entire community to all of its own activity areas and to the San Diego metropolitan area as a whole.	Refer to the above response.

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

TABLE 6.1-1B, CONTINUED

Goal	Summary of Project Consistency
Industrial Goals	
Ensure that industrial land needs as required for a balanced economy and balanced land use are met consistent with environmental considerations.	The approximately 3.97-acre site is designated as Scientific Research in the City of San Diego University Community Plan. The General Plan designates the site for "Industrial Employment" and Prime Industrial Lands. The proposed project would not change the existing Prime Industrial or Scientific Research use designations, and the proposed R&D use would be consistent with the intended use of the property; however, approval of a General Plan Amendment is required relative to the proposed changes to the University Community Plan. The project proposes to rezone the site from RS-1-14 (Residential--Single-Family Unit) to EMX-2 (Employment Mixed-Use), which is consistent with and implements the Prime Industrial identification and Scientific Research use designation. The project would result in redevelopment of the site with approximately 369,878 sq. ft. of mixed-use research, retail, and office uses across two buildings. The project would consist of approximately 310,416 sq. ft. of R&D uses and 59,462 sq. ft. as accessory/amenity space to serve the University community and the larger San Diego region. The site is highly developed under current conditions and is located within the urbanized University community. Environmental impacts resulting with development of the site as proposed have been evaluated in this Tiered Initial Study and all potential impacts would be reduced to less than significant through implementation of the mitigation measures identified.
Emphasize the citywide importance of and encourage the location of scientific research uses in the North University area because of its proximity to UCSD.	The project site is designated as Scientific Research in the City of San Diego University Community Plan. The project would transfer development intensity rights (3,744 average daily trips or "ADT") from University Community Plan Area Subarea 37 (City Ownership) to newly created Subarea 102 and Subarea 10 as follows: 1,933 ADT transferred to new Subarea 102 (project site), which would allow an additional 241,600 square feet of scientific research/R&D; and 1,811 average daily trips (or ADT) transferred to Subarea 10 (Alexandria, Campus Point), which will allow an additional 226,400 square feet of scientific research/R&D space. The southern portion of Subarea 37, though designated Scientific Research, is precluded from development due to existing conservation easements. The transfer from Subarea 37 to Subareas 102 and 10 would allow development of additional Scientific Research uses that otherwise would not be realized, and the proposed Community Plan amendment would designate the southern portion of Subarea 37 to Open Space to align with the existing conservation easements. The project would include approximately 310,416 sq. ft. for use in support of scientific research and development use. R&D space would account for approximately 84 percent of the total square footage proposed, thereby supporting the goal of locating such uses within the University community and within proximity to UCSD.

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

TABLE 6.1-1B, CONTINUED

Goal	Summary of Project Consistency
Public Facilities Goals	
Provide a high level of service in police and fire protection.	The project site is currently served by the San Diego Fire-Rescue Department Station 35, located approximately 0.6 miles west of the site (4285 Eastgate Mall in University). San Diego Fire-Rescue facilities and personnel would continue to be available and adequate to serve the project site, as occurs under existing conditions, once the proposed development is constructed. Due to the nature of the proposed use (Scientific Research), combined with the fact that the fire department currently provides service to similar on-site commercial office uses, the project would not adversely affect existing levels of fire protection services to the area. All access to the site, as well as on-site circulation, has been designed in accordance with local City and fire department regulations to ensure that public safety is maintained. Further, the project applicant would be subject to the payment of development impact fees to offset potential effects on fire protection services. The subject site is currently served by the San Diego Police Department (SDPD) Northern Division, located approximately 0.6 miles west (4275 Eastgate Mall in University). Due to the close proximity of the police station and the mobile nature of police patrols, it is anticipated that adequate facilities and personnel would be available to respond to any incident at the project site. Additionally, the proposed land use type is not anticipated to substantially increase demand for police protection services in the area as compared to existing conditions. Improvement plans prepared for the project have been reviewed by the City's Fire and Police Departments as part of the discretionary review process. The project has been designed in accordance with comments provided by such agencies to ensure that adequate fire and police protection services can be provided for the project as proposed.
Noise Goals	
Minimize and avoid adverse noise impacts by planning for the appropriate placement and intensity of land uses relative to noise sources.	The project site is located within the 60-65 community noise equivalent level (CNEL) noise contour of the 2020 MCAS Miramar Air Installations Compatible Use Zones (AICUZ) Update. The site is subject to multiple flight corridors and will experience overflight and noise from operations. However, the U.S. Marine Corps has provided written correspondence to the City indicating that the project as proposed is consistent with AICUZ noise criteria; refer to Appendix A. The project would implement mitigation (mitigation measure NOI-1) to reduce potential construction noise impacts to less than significant. Due to the nature of the proposed use, the project would not result in significant noise impacts from operational activities, Significant impacts due to vehicle traffic or stationary noise sources would not occur. Additionally, the project would be consistent with the City's General Plan Noise Element Table 3, City of San Diego Land Use Compatibility for Community Noise Environments, that identifies a 50 dBA CNEL exterior noise level for industrial uses (including light manufacturing) and a 50 dBA CNEL exterior noise level for office uses. As demonstrated in the analysis provided in Section 6.10, Noise, of this IS/MND, project operations would not exceed such noise level thresholds; refer also to Appendix G, Acoustical Assessment, for additional discussion. Thus, the proposed uses would minimize and avoid adverse noise impacts.

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

TABLE 6.1-1B, CONTINUED

Goal	Summary of Project Consistency
Safety Goals	
Protect the public health and safety by guiding future development so that land use is compatible with identified geologic risks, including seismic and landslide hazards.	Although no active faults traverse the project site, all new development would be required to comply with the requirements of the Alquist-Priolo Fault Zoning Act and the California Building Code to ensure structural seismic safety and to address other geologic hazards. Compliance with the recommendations of the site-specific geotechnical reports prepared for the project would minimize potential safety risks caused by strong seismic shaking and/or fault rupture (Geocon Incorporated 2022; see Appendix C). Additionally, the site is relatively flat and does not support steep slopes that may be subject to landslides. The potential for liquefaction and seismically induced settlement occurring within on-site soils is considered to be very low due to the dense nature of the fill, Very Old Paralic Deposits and Scripps Formation and lack of groundwater within 50 feet of the ground surface (Geocon Incorporated 2022; see Appendix C).
Ensure that proposed development does not create or increase geologic hazards either on- or off-site.	Refer to the above response. The project site is relatively flat and site development as proposed would not induce geologic hazards on-site or off-site. No steep slopes, active faults, or areas susceptible to landslide, subsidence, or ground failure occur on-site and would therefore not be affected or disturbed by the project.
Provide for the safe operation of MCAS Miramar through the preservation of appropriate departure corridors.	The project site is located within FAA Part 77 Noticing Area for the MCAS Miramar Airport Land Use Compatibility Plan (ALUCP) and is required to obtain an FAA Part 77 Notice of Determination Letter. However, consistent with FAA allowances, the project applicant has completed self-certification of the project. A note has been added to the improvement plans to indicate that the City does not require notification to the FAA if a professional, licensed by the state of California to prepare construction documents, provides a certification on the plans along with their registration and stamp and signature, as allowed per Section 77.15(A) of Title 14 of the Code of Federal Regulations CFR Part 77. Additionally, the project is required to obtain a determination of consistency from the San Diego County Regional Airport Authority, which acts as the ALUC for San Diego County. A letter was received from the County ALUC on May 2, 2022 indicating that the site lies within the Airport Influence Area (AIA) for the MCAS Miramar ALUCP. The letter indicated that the ALUC had reviewed the project and determined that, in accordance with the San Diego Regional Airport Authority Policy 8.30 and applicable provisions of the State Aeronautics Act (Cal. Pub. Util. Code §21670-21679.5), the project is conditionally consistent with the MCAS Miramar ALUCP, based upon the findings summarized in the letter. Therefore, the project has been designed in accordance with relevant height and safety regulations pertaining to airport operations and is in conformance with allowed use of the subject site; refer to Appendix A for a copy of the determination letter.

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

TABLE 6.1-1B, CONTINUED

Goal	Summary of Project Consistency
Resource Management Goals	
Contribute to the maintenance or improvement of regional water quality by controlling siltation and urban pollutants in runoff.	A stormwater pollution prevention plan (SWPPP) that specifies best management practices (BMPs) to prevent grading/construction-related pollutants (including sediment from erosion) from contacting stormwater and moving off-site into receiving waters, as well as elimination/reduction of non-stormwater discharges, would be implemented during construction. Further, all project construction activities would occur in conformance with the recommendations of the *Stormwater Quality Management Plan (SWQMP)* prepared for the project (Michael Baker 2022; refer to Appendix F-1). Pursuant to the City's Stormwater Standards Manual, the project would be designed to ensure that there would be no measurable increase of pollution (including sediment) in runoff from the site; no slope erosion; and, water velocity moving off-site would not be greater than preconstruction levels during project operation. The project would meet these requirements by creating and implementing a series of stormwater BMPs and detention facilities specifically designed for the project.
Encourage the conservation of water in the design and construction of buildings and in landscaping.	The project has been designed to incorporate drought-tolerant landscaping and low water and recycled water irrigation systems to encourage water conservation goals. Refer also to Figure 4, Conceptual Landscape Plan.
Reduce energy consumption by requiring energy efficiency in building design and landscaping and by planning for a self-contained community and energy-efficient transportation.	Energy-saving features incorporated into the proposed development are anticipated to include drought-tolerant landscaping; low water and recycled water irrigation systems; installation of a solar-ready roof; and energy-saving lighting, mechanical systems, and low-flow plumbing fixtures and fittings. The project would be designed to meet or exceed requirements of the California Green Building Code (CALGreen; CCR Title 24, Part 11) and would achieve LEED Gold certification. Additionally, transportation-related sustainability features would include such measures as the provision of on-site bike racks and bike lockers/storage; shower facilities; electric vehicle charging stations (EVCS); promotion of alternative transportation programs; and carpool priority parking.
Provide for the identification and recovery of significant paleontological resources.	The project site is underlain by moderately sensitive Lindavista Formation at depths of 15.5 to 24.9 feet and the highly sensitive Scripps Formation at depths between 25 to 34 feet, as well as potentially underlain by the highly sensitive Stadium Conglomerate at depths between 15.5 to 34 feet. Excavation for the project is planned at an approximate maximum depth of 71 feet to accommodate the subterranean parking garage. As excavation would extend approximately 50 feet deeper than the existing on-site development, the project is considered to have the potential to impact undiscovered paleontological resources. To ensure the protection of such resources, the project would be subject to requirements identified in the City of San Diego grading ordinance (Land Development Code Section 142.0151, Paleontological Resources Requirements for Grading Activities], which requires monitoring for paleontological resources during project grading activities and proper identification and handling of any resources discovered in accordance with the City's General Grading Guidelines for Paleontological Resources (Land Development Code Section 142.0151(b)).

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

TABLE 6.1-1B, CONTINUED

Goal	Summary of Project Consistency
Ensure the effective preservation and management of significant archaeological and historic resources.	A *Cultural Resources Identification Report (*Appendix E*)* was completed for the site. No known historical, archaeological, or tribal cultural resources have been identified on the project site. The project site appears to have low to moderate sensitivity for buried archaeological resources based on proximity of previously recorded archaeological sites in the vicinity. There are no known archaeological resource concerns on the project site. Based on existing site conditions, the results of the cultural resources database searches, and consultations with the affected tribes, it is not anticipated that the project would result in a significant impact relative to cultural resources. No mitigation measures or construction monitoring are required. Impacts would be less than significant. Refer to Appendix E*, Cultural Resources Identification Report*, for additional details.

City of San Diego Municipal Code

The project proposes a rezone to redesignate the property from RS-1-14 (Residential--Single-Family) to EMX-2 (Employment Mixed-Use), as the existing RS-1-14 zone does not allow for the proposed Scientific Research Community Plan land use. Rezoning to EMX-2 would allow the project to be consistent with the City's Scientific Research University Community Plan land use designation and Prime Industrial General Plan designation by allowing for a variety of employment-focused uses.

The project site is currently developed and located within an urbanized area of the City. The site is generally flat in nature and does not support any steep slopes or hillsides. In addition to the developed/paved surface areas, ornamental landscaping and a number of mature trees are present; however, no natural open space areas are present on-site. Further, the site does not support any areas designated by the City as Environmentally Sensitive Lands (ESLs), defined in Section 113.0103 of the City's Municipal Code as "lands containing steep hillsides, sensitive biological resources, coastal beaches, sensitive coastal bluffs, or Special Flood Hazard Areas." As no such resources exist on-site, the project would not cause a significant environmental impact as the result of conflict with any regulations adopted for the purpose of avoiding or mitigating an environmental effect. Refer also to Section 6.3, Biological Resources.

City of San Diego Climate Action Plan (CAP)

The City of San Diego CAP, adopted in December 2015, quantifies greenhouse gas (GHG) emissions; establishes citywide reduction targets for 2020 and 2035; identifies GHG-reduction strategies; and identifies means of monitoring annual progress. The CAP establishes goals and policies aimed at reducing GHG emissions through water- and energy-efficient buildings; clean and renewable energy; bicycling, walking, transit and land use; zero waste; and climate resiliency.

The City recently adopted its 2022 CAP which builds upon the 2015 CAP, establishing more aggressive goals to reduce GHG emissions. The 2022 CAP establishes a community-wide goal of net zero energy by 2035, thereby committing the City to an accelerated strategy to achieve GHG reductions while also requiring equity, accountability, and transparency in doing so. Further, the City recently adopted its CAP Consistency Regulations in April 2022 (SMDC Chapter 14, Article 3, Division 14, Climate Action Plan Consistency Regulations) which apply to ministerial and discretionary projects to ensure that such projects comply with the goals and objectives of the updated CAP. The

City's prior GHG Significance Determination threshold allowed for project-level environmental analysis to demonstrate consistency with the CAP through use of the CAP Consistency Checklist. The recently adopted CAP Consistency Regulations replaced the City's CAP Consistency Checklist as the list of measures that can be implemented on a project-by-project basis to collectively achieve a specified emissions level as required by CEQA Guidelines Section 15183.5b(1)(D). However, the proposed project was deemed complete prior to the CAP Consistency Regulations effective date of October 23, 2022, and therefore, per the CAP Consistency Regulations, the previous CAP Consistency Checklist and GHG 2020 significance determination guidelines were applied in evaluating potential project effects on climate change (as analyzed herein in this Initial Study).

As discussed below in Section 6.6, Greenhouse Gas Emissions, the project is required to demonstrate conformance with the City's CAP Consistency Checklist relative to GHG and energy reductions. The project has been designed to incorporate design measures to ensure consistency with the City's CAP and would therefore not result in a significant impact relative to global climate change and GHG emissions.

The project is not anticipated to conflict with any land use plans or regulations adopted for the purpose of avoiding or mitigating an environmental effect in this regard. Impacts would be less than significant.

Marine Corps Air Station (MCAS) Miramar Airport Land Use Compatibility Plan ALUCP

The MCAS Miramar ALUCP was adopted on October 2, 2008, and subsequently amended. MCAS Miramar is located north of SR 52 and south of the Mira Mesa community. Portions of the project site lie within the MCAS Miramar Airport Influence Area (AIA) Review Areas 1 and 2.

The City of San Diego Development Services Department received a letter dated March 18, 2022 from the U.S. Marine Corps in regard to the proposed project recognizing that the project site is located within the 60-65 community noise equivalent level (CNEL) noise contour of the 2020 MCAS Miramar Air Installations Compatible Use Zones (AICUZ) Update (refer also to Appendix A, Airport Land Use Compatibility Documentation). The site is subject to multiple flight corridors and will experience overflight and noise from operations. However, the Marine Corps indicated that the project as proposed is consistent with AICUZ noise criteria.

As stated above, the project site is located within Federal Aviation Administration (FAA) Part 77 Noticing Area for the MCAS Miramar ALUCP and is required to obtain an FAA Part 77 Notice of Determination Letter. However, consistent with FAA allowances, the project applicant has completed self-certification of the project, as allowed per Section 77.15(A) of Title 14 of the Code of Federal Regulations CFR Part 77.

Additionally, the project is required to obtain a determination of consistency from the San Diego County Regional Airport Authority, which acts as the ALUC for San Diego County. A letter was received from the County ALUC on May 2, 2022 indicating that the ALUC had determined that, in accordance with the San Diego Regional Airport Authority Policy 8.30 and applicable provisions of the State Aeronautics Act (Cal. Pub. Util. Code §21670-21679.5), the project is conditionally consistent with the MCAS Miramar ALUCP, based upon the findings summarized in the letter.

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

Therefore, the project has been designed in accordance with relevant height and safety regulations pertaining to airport operations and is in conformance with allowed use of the subject site; refer to Appendix A for a copy of the determination letter.

The project as proposed has been designed consistent with land use and height limitations for the area and would not cause a significant environmental impact relative to noise or hazardous conditions as the result of conflict with any adopted regulations aimed at avoiding or mitigating an environmental effect. Refer also to Section 6.7, Health and Safety. Impacts would be less than significant.

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

The project site is located in a highly urbanized setting surrounded by existing development. The site currently supports commercial office buildings and is predominantly developed and paved.

No lands designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance under the California Department of Conservation Farmland Mapping and Monitoring Program or lands designated for agricultural use or open space in the City of San Diego's Progress Guide and General Plan are present on the subject site. Therefore, the project would not lead to the development or conversion of General Plan or Community Plan designated open space or Prime Farmland to a more intensive land use, resulting in a physical division of the community. No impact would occur with project implementation.

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

The ALUCP for MCAS Miramar establishes land use compatibility policies and development criteria for new development within the AIA to prevent incompatible land uses and to identify development criteria that can be used by the City (and other agencies) to ensure orderly growth within the airport vicinity. The policies and criteria adopted with the ALUCP are addressed in the City's General Plan Land Use and Community Planning Element and Noise Element and are further guided by development regulations identified for the Airport Land Use Compatibility Overlay Zone in Chapter 13 of the San Diego Municipal Code.

Portions of the project site lie within the AIA Review Areas 1 and 2 of the ALUCP for MCAS Miramar. As stated above, the U.S. Marine Corps has indicated that the project as proposed is consistent with AICUZ noise criteria. Therefore, no conflict is anticipated to occur in this regard; refer to Appendix A. Additionally, the project as proposed has been designed with respect for land use and height limitations for the area and would not cause a significant environmental impact relative to noise or hazardous conditions.

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

The project site is within FAA Part 77 Noticing Area for MCAS Miramar ALUCP and is required to obtain an FAA Part 77 Notice of Determination Letter. As stated above, the project applicant has completed self-certification of the project, as allowed per Section 77.15(A) of Title 14 of the Code of Federal Regulations CFR Part 77. Additionally, the San Diego County Regional Airport Authority ALUC has indicated that the ALUC determined that, in accordance with the San Diego Regional Airport Authority Policy 8.30 and applicable provisions of the State Aeronautics Act (Cal. Pub. Util. Code §21670-21679.5), the project is conditionally consistent with the MCAS Miramar ALUCP. The ALUC identified the following: 1) the proposed use is compatible with airport uses and that development must adhere to the noise compatibility policies of the ALUCP, including interior noise level standards; 2) the project is subject to maximum height limitations and FAA determination of no hazard to air navigation, or certification that FAA notice is not required as the project would have no effect on air navigation; 3) the project lies outside of all Safety Zones or overflight notification requirements; 4) if the project contains the above-required conditions, the project would be consistent with the MCAS Miramar ALUCP.

Therefore, the project has been designed in accordance with relevant height and safety regulations pertaining to airport operations and is in conformance with allowed use of the subject site; refer to Appendix A for a copy of the determination letter.

The project as proposed would therefore not result in land uses that are incompatible with an adopted airport land use compatibility plan. Impacts would be less than significant.

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

The State Implementation Plan (SIP) sets forth the state's strategies for attaining and maintaining the national ambient air quality strategies (NAAQS). The San Diego Air Pollution Control District (SDAPCD) is responsible for developing the San Diego portion of the SIP and has developed an attainment plan for attaining the 8-hour NAAQS for ozone (O_3). The RAQS sets forth the plans and programs designed to meet the state air quality standards. Through the RAQS and SIP planning processes, the SDAPCD adopts rules, regulations, and programs designed to achieve attainment of the ambient air quality standards and maintain air quality in the San Diego Air Basin.

Conformance with the RAQS and SIP determines whether a project will conflict with or obstruct implementation of the applicable air quality plans. Because California Air Resources Board (CARB) mobile source emission projections and SANDAG growth projections are based on population and vehicle trends and land use plans developed by local jurisdictions as part of their general plans, projects that propose development consistent with the growth anticipated by the general plan are assumed to be consistent with the RAQS and SIP. In the event a project proposes development which is less dense than anticipated within the general plan, the project would likewise be consistent with the RAQS and SIP.

The project site is located within the University Community Plan area. The plan manages traffic volumes and development intensity through its Development Intensity Element. The University Community Plan is divided into subareas and assigned development intensities based on a

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

community-wide traffic forecast. Under the plan, "Development rights may be transferred between subdivisions in conjunction with a Planned Development Permit restricting both the sending and receiving sites" (City of San Diego 2019). Effectively, this mechanism allows for an increase of development intensity in one subarea in exchange for an equivalent decrease of development intensity in another subarea, leading to no-net increases in ADT in the community plan area.

As previously stated, the project would transfer development intensity rights (3,744 ADT) from University Community Plan Area Subarea 37 (City Ownership) to newly created Subarea 102 and Subarea 10 as follows: 1,933 ADT transferred to new Subarea 102 (project site), which will allow an additional 241,600 square feet of scientific research/R&D; and 1,811 ADT transferred to Subarea 10 (Alexandria, Campus Point), which will allow an additional 226,400 square feet of scientific research/R&D space. As such, the project would be consistent with the anticipated development density planned for the project site. As the project would not increase the development intensity beyond that accounted for in the RAQS, the project would be consistent with the RAQS and SIP. Therefore, impacts would be less than significant.

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

Short-Term Construction Emissions

Short-term air quality impacts would occur during grading and construction operations associated with project implementation. Temporary air emissions would result from the following activities:

- Particulate (fugitive dust) emissions from grading and building construction; and
- Exhaust emissions from construction equipment and construction crew motor vehicles.

Construction activities would include demolition, grading, paving, building construction, and architectural coatings. It is anticipated that necessary earthwork to accommodate the proposed improvements would require a total cut of approximately 315,000 cubic yards and a total fill of approximately 100 cubic yards Therefore, approximately 314,900 cubic yards of soil would be exported off-site and disposed of at a licensed facility.

Project construction would require concrete saws, excavators, and rubber-tired dozers during demolition; excavators, graders, rubber-tired dozers, scrapers, and tractors/loaders/backhoes during grading; cranes, forklifts, generator sets, tractors/loaders/ backhoes, and welders during building construction; pavers, paving equipment, and rollers during paving; and air compressors during architectural coatings. Emissions for each construction phase have been quantified based upon the phase durations and equipment types. An analysis of daily construction emissions was prepared utilizing the California Emissions Estimator Model version 2020.4.0 (CalEEMod). Table 6.2-1, Maximum Daily Construction Emissions, identifies the anticipated daily short-term construction emissions.

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

TABLE 6.2-1. MAXIMUM DAILY CONSTRUCTION EMISSIONS

Emissions Source	Pollutant (pounds per day)[1,2]					
	VOC	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Year 1						
Construction Emissions[2]	9.10	144.53	77.55	0.43	15.79	6.80
SDAPCD Thresholds	*137*	*250*	*550*	*250*	*100*	*55*
Threshold Exceeded?	***No***	***No***	***No***	***No***	***No***	***No***
Year 2						
Construction Emissions[2]	3.12	26.17	29.05	0.09	3.96	1.72
SDAPCD Thresholds	*137*	*250*	*550*	*250*	*100*	*55*
Threshold Exceeded?	***No***	***No***	***No***	***No***	***No***	***No***
Year 3						
Construction Emissions[2]	71.18	35.56	46.32	0.12	4.95	2.26
SDAPCD Thresholds	*137*	*250*	*550*	*250*	*100*	*55*
Threshold Exceeded?	***No***	***No***	***No***	***No***	***No***	***No***

Notes: VOC = volatile organic compounds; NO_X = nitrous oxides; CO = carbon monoxide; SO_2 = sulfur dioxides; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter

1. Emissions were calculated using CalEEMod version 2020.4.0. Winter emissions represent worst-case.
2. The mitigation reduction/credits for construction emissions are based on mitigation included in CalEEMod and are required by the SDAPCD Rule 55&67.1. The mitigation applied in CalEEMod includes the following: properly maintain mobile and other construction equipment; water exposed surfaces three times daily; limit speeds on unpaved roads to 15 miles per hour; and use of low VOC paint. The emissions results in this table represent the "mitigated" emissions shown in Appendix A of Appendix B.

Source: *Air Quality Assessment,* Michael Baker International. 2022. See Appendix B.

Total Daily Construction Emissions

In accordance with the SDAPCD Guidelines, CalEEMod was utilized to model construction emissions for reactive organic gases (ROG), NO_X, CO, SO_X, PM_{10}, and $PM_{2.5}$. The greatest emissions would be generated during the initial stages of construction. Additionally, the greatest amount of ROG emissions would typically occur during the final stages of construction due to the application of architectural coatings.

As depicted in Table 6.2-1 above, construction emissions would not exceed the SDAPCD thresholds of significance for any criteria pollutants. Thus, construction-related air emissions would not result in a cumulatively considerable net increase of any criteria pollutant and a less than significant impact would occur.

Naturally Occurring Asbestos

Asbestos is a term used for several types of naturally occurring fibrous minerals that are a human health hazard when airborne. The most common it is not type of asbestos is chrysotile, but other types such as tremolite and actinolite are also found in California. Asbestos is classified as a known human carcinogen by state, federal, and international agencies and was identified as a toxic air contaminant (TAC) by CARB in 1986.

Asbestos can be released from serpentinite and ultramafic rocks when the rock is broken or crushed. At the point of release, the asbestos fibers may become airborne, causing air quality and human health hazards. These rocks have been commonly used for unpaved gravel roads, landscaping, fill projects, and other improvement projects in some localities. Asbestos may be released to the atmosphere due to vehicular traffic on unpaved roads, during grading for development projects, and at quarry operations. All of these activities may have the effect of releasing potentially harmful asbestos into the air. Natural weathering and erosion processes can act on asbestos bearing rock and make it easier for asbestos fibers to become airborne if such rock

is disturbed. According to the California Department of Conservation Division of Mines and Geology, serpentinite and ultramafic rocks are not known to occur within the project area (Michael Baker 2022). Thus, there would be no impact in this regard.

Long-Term Operational Emissions

Operational impacts associated with the project would include those generated by mobile, area, and energy sources. Table 6.2-2, Long-Term Operational Source Emissions, presents the project's anticipated long-term air quality emissions. It should be noted that the emissions reduction for the existing office buildings has not been accounted for in Table 6.2-2. Therefore, the project's operational emissions shown in Table 6.2-2 are considered conservative.

TABLE 6.2-2. LONG-TERM OPERATIONAL EMISSIONS

	Emissions (pounds per day)[1]					
Scenario	**ROG**	**NO_x**	**CO**	**SO_x**	**PM_{10}**	**$PM_{2.5}$**
Project Summer Emissions[2]						
Area Source	10.48	<0.01	0.13	<0.01	<0.01	<0.01
Energy Source	0.16	1.47	1.23	<0.01	0.11	0.11
Mobile	7.69	7.49	66.15	0.14	15.08	4.209
Total Maximum Daily Emissions[3]	*18.33*	*8.96*	*67.52*	*0.15*	*15.20*	*4.20*
SDAPCD Regional Threshold	***137***	***250***	***550***	***250***	***100***	***55***
Threshold Exceeded?	*No*	*No*	*No*	*No*	*No*	*No*
Project Winter Emissions[2]						
Area Source	10.48	<0.01	0.13	<0.01	<0.01	<0.01
Energy Source	0.16	1.47	1.23	<0.01	0.11	0.11
Mobile	7.50	8.13	68.17	0.14	15.08	4.09
Total Maximum Daily Emissions[3]	*18.13*	*9.60*	*69.53*	*0.15*	*15.20*	*4.20*
SDAPCD Regional Threshold	***137***	***250***	***550***	***250***	***100***	***55***
Threshold Exceeded?	*No*	*No*	*No*	*No*	*No*	*No*

Notes: VOC = volatile organic compounds; NO_X = nitrous oxides; CO = carbon monoxide; SO_2 = sulfur dioxides; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter

1. Emissions were calculated using CalEEMod version 2020.4.0.
2. These emissions correspond with the "unmitigated" CalEEMod operational emissions shown in Appendix A of Appendix B.
3. The numbers may be slightly off due to rounding.

Source: *Air Quality Assessment*, Michael Baker International. 2022. See Appendix B.

Mobile Source Emissions

Mobile sources are emissions from motor vehicles, including tailpipe and evaporative emissions. Depending upon the pollutant being discussed, the potential air quality impact may be of either regional or local concern. For example, ROG, NO_X, SO_X, PM_{10}, and $PM_{2.5}$ are all pollutants of regional concern (NO_X and ROG react with sunlight to form O_3 [photochemical smog], and wind currents readily transport SO_X, PM_{10}, and $PM_{2.5}$). However, CO tends to be a localized pollutant, dispersing rapidly at the source.

Project-generated vehicle emissions were estimated using CalEEMod. Trip generation rates associated with the project are provided in Appendix B, Traffic Data, of Appendix B. The project would generate an estimated 2,959 ADT. As shown in Table 6.2-2, emissions generated by vehicular traffic associated with the project would not exceed established SDAPCD regional thresholds, and therefore, impacts in this regard would be less than significant.

Area Source Emissions

Area source emissions would be generated due to architectural coatings, an increased demand for consumer products, and landscaping associated with the proposed project. As shown in Table 6.2-2, area source emissions from the project would not exceed SDAPCD thresholds for ROG, NO_X, CO, SO_X, PM_{10}, or $PM_{2.5}$.

Energy Source Emissions

Energy source emissions would be generated as a result of electricity and natural gas (non-hearth) usage associated with the proposed project. The primary use of electricity and natural gas by the project would be for space heating and cooling, water heating, ventilation, lighting, appliances, and electronics. As shown in Table 6.2-2, energy source emissions from the project would not exceed SDAPCD thresholds for ROG, NO_X, CO, SO_X, PM_{10}, or $PM_{2.5}$.

As indicated in Table 6.2-2, operational emissions from the proposed project would not exceed SDAPCD thresholds. If stationary sources, such as backup generators, are installed on-site, they would be required to obtain the applicable permits from the SDAPCD for operation of such equipment. The SDAPCD is responsible for issuing permits for the operation of stationary sources in order to reduce air pollution, and to attain and maintain the NAAQS and California AAQS in the San Diego Air Basin. If backup generators are required, they would be used only in emergency situations, and would not contribute substantial emissions capable of exceeding SDAPCD thresholds. Thus, operational air emissions would not result in a cumulatively considerable net increase of any criteria pollutant and a less than significant impact would occur.

Air Quality Health Impacts

Adverse health effects induced by criteria pollutant emissions are highly dependent on a multitude of interconnected variables (e.g., cumulative concentrations, local meteorology and atmospheric conditions, and the number and character of exposed individual [e.g., age, gender]). In particular, O_3 precursors, volatile organic compounds (VOCs), and NO_x affect air quality on a regional scale. Health effects related to O_3 are therefore the product of emissions generated by numerous sources throughout a region. Existing models have limited sensitivity to small changes in criteria pollutant concentrations, and, as such, translating project-generated criteria pollutants to specific health effects or additional days of nonattainment would produce meaningless results. In other words, the project's less than significant increases in regional air pollution from criteria air pollutants would have nominal or negligible impacts on human health. The project would have a less than significant impact relative to air quality health impacts.

Carbon Monoxide (CO) Hotspot

CO emissions are a function of vehicle idling time, meteorological conditions, and traffic flow. Under certain extreme meteorological conditions, CO concentrations near a congested roadway or intersection may reach unhealthful levels (i.e., adversely affecting residents, school children, hospital patients, the elderly, etc.).

The Basin is designated as an attainment area for the federal and state CO standards. There has been a decline in CO emissions even though VMT on US urban and rural roads have increased. Nationwide estimated anthropogenic CO emissions have decreased 68 percent between 1990 and

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

2014. In 2014, mobile sources accounted for 82 percent of the nation's total anthropogenic CO emissions. CO emissions have continued to decline since this time. Three major control programs have contributed to the reduced per-vehicle CO emissions: exhaust standards, cleaner burning fuels, and motor vehicle inspection/ maintenance programs.

A potential CO hotspot may occur at any location where the background CO concentration already exceeds 20 parts per million (ppm), which is the 1-hour California ambient air quality standard. The closest monitoring station to the project site that monitors CO concentration is the San Diego-Rancho Carmel Drive Monitoring Station, and the maximum CO concentration was measured at 3.300 ppm in 2020. Given that the background CO concentration does not currently exceed 20 ppm, a CO hotspot would not occur at the project site. Therefore, CO hotspot impacts would be less than significant.

As discussed above, the project would not be a significant source of TAC or result in CO hotspot emissions impacts. As such, the project would not expose sensitive receptors to substantial pollutant concentrations and a less than significant impact would occur.

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

Air quality regulators typically define sensitive receptors as schools (preschool through twelfth grade), hospitals, resident care facilities, or day care centers, or other facilities that may house individuals with health conditions that would be adversely impacted by changes in air quality. Residential land uses may also be considered sensitive to air pollution because residents (including children and the elderly) tend to be at home for extended periods of time, resulting in sustained exposure to existing pollutants. Recreational land uses are considered moderately sensitive to air pollution. Exercise places a high demand on respiratory functions, which can be impaired by air pollution even though exposure periods during exercise are generally short. In addition, noticeable air pollution can detract from the enjoyment of recreation. Industrial and commercial areas are considered the least sensitive to air pollution. Exposure periods are relatively short and intermittent as the majority of the workers tend to stay indoors most of the time.

The project vicinity includes a mixture of residential, commercial, and industrial land uses. The nearest sensitive receptor to the site is a multifamily residential complex located approximately 220 feet to the southwest.

If a project has the potential to result in TAC emissions with a cancer risk greater than 10 in 1 million or substantial non-cancer risk, the project would be deemed to have a potentially significant impact. Project construction activities are anticipated to involve the operation of diesel-powered equipment, which would emit diesel particulate matter (DPM). In 1998, CARB identified diesel exhaust as a TAC. Cancer health risks associated with exposures to diesel exhaust typically are associated with chronic exposure, in which a 30-year exposure period often is assumed.

The project would comply with CCR, Title 13, Sections 2449(d)(3) and 2485, which minimizes the idling time of construction equipment either by turning it off when not in use or by reducing the

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

time of idling to no more than five minutes. Implementation of these regulations would reduce the amount of DPM emissions from project construction.

The nearest sensitive receptors to the project site include a multifamily residential complex located approximately 220 feet to the southwest. However, health impacts on sensitive receptors associated with exposure to DPM from project construction are anticipated to be less than significant because construction activities are expected to occur well below the 30-year exposure period used in health risk assessments. Additionally, emissions would be short term and intermittent in nature, and therefore would not generate TAC emissions at high enough exposure concentrations to represent a health hazard. Therefore, construction of the proposed project is not anticipated to result in an elevated cancer risk to nearby sensitive receptors and impacts would be less than significant.

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

Project construction could result in minor amounts of odor compounds associated with diesel heavy equipment exhaust. These compounds would be emitted in various amounts and at various locations during construction. The nearest sensitive receptor to the site is a multifamily residential complex approximately 220 feet to the southwest. Odors are highest near the source and would quickly dissipate off-site. Additionally, any odors associated with construction would be temporary. The project would also be required to comply with CCR, Title 13, Sections 2449(d)(3) and 2485, which minimizes the idling time of construction equipment either by shutting it off when not in use or by reducing the time of idling to no more than five minutes. This would further reduce the detectable odors from heavy-duty equipment exhaust. Thus, given the distance of the nearest sensitive receptors and the fact that construction-related odorous emissions would be short term and temporary, construction activities would result in less than significant impacts in this regard.

The project consists of scientific research and accessory uses and would not include land uses that would be sources of objectionable odors. In addition, the project would comply with SDAPCD Rule 51, which prohibits the emission of any material, including odors, which causes a nuisance to a considerable number of people or endangers the comfort, health, or safety of the public. Thus, the potential for odor impacts associated with the project is less than significant.

6.3. BIOLOGICAL RESOURCES - Would the project:

Issue 1: Result in a substantial adverse impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in the Multiple Species Conservation Program or other local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☐	☒

The project site is currently fully developed with no natural habitat occurring on-site. Additionally, surrounding lands are urbanized and likewise do not contain natural habitat. The project site is

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

located within the boundaries of the City of San Diego MSCP Subarea Plan, but outside the boundaries of the Coastal Overlay Zone and Multi-Habitat Planning Area (MHPA).

As such, the proposed project would not directly or through habitat modification affect any species identified as a candidate, sensitive, or special status in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or the US Fish and Wildlife Service, as no such species are present on-site. No impact to biological resources would occur in this regard.

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

Refer to Section 6.3, Issue 1, above. The project site is currently developed with commercial uses. Riparian habitat or other sensitive natural communities do not occur on-site or in the immediate project vicinity. Therefore, the project would not directly or indirectly impact any Tier I Habitats, Tier II Habitats, Tier IIIA Habitats, or Tier IIIB Habitats as identified in the City's Biology Guidelines of the Land Development Manual or other sensitive natural community. Therefore, no impact would occur.

Issue 3: Result in a substantial adverse effect on federally protected wetlands (including but not limited to marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☐	☒

Refer to Section 6.3, Issue 1, above. The project site is fully developed and does not contain any wetland habitat. Therefore, potential impacts to such habitat through direct removal, filling, hydrological interruption, or other means would not occur. No impact would result with project implementation.

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

Refer to Section 6.3, Issue 1, above. No formal and/or informal wildlife corridors or native wildlife nursery sites exist on or near the project, as the site is located within a fully urbanized area. No adverse impacts to the movement of any native resident or migratory fish or wildlife species or to established native resident or migratory wildlife corridors would occur as a result of the proposed project. Therefore, no impact would occur.

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
Issue 5: Result in a conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan, either within the Multiple Species Conservation Program (MSCP) plan area or in the surrounding region?	☐	☐	☐	☐	☒

Refer to Section 6.3, Issue 1 and 3, above. The project site is located within the boundaries of the City of San Diego MSCP Subarea Plan, but outside the boundaries of the MHPA. The project site is fully developed and surrounded by urban development. The closest MHPA is located approximately 1 mile south of the project site. As stated, the project site does not support sensitive habitat or species due to its developed condition and location within a highly urbanized area of the City. Thus, project implementation would not result in the loss of any such resources due to development, nor would it conflict with any goals, policies, or requirements aimed at the long-term protection of such resources.

Additionally, the southern portion of University Community Plan Area Subarea 37 that is to be redesignated Scientific Research to Open Space is currently within the MHPA. The redesignation would be consistent with the current conservation status of this area.

Therefore, the project would not result in a conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan, either within a MSCP plan area or in the surrounding region. No impact would occur.

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

Refer to Section 6.3, Issue 1, above. No sensitive habitats or species are present on-site due to the developed nature of the subject property and location within a highly urbanized portion of the City. The project site does not contain native trees or any sensitive biological resources or habitat. All trees currently present on-site are ornamental trees planted as landscape enhancements and are therefore not sensitive biological resources requiring protection; refer also to Figure 4, Conceptual Landscape Plan.

For the reasons above, the project would not conflict with any local policies or ordinances for the protection of biological resources, such as a tree preservation policy or ordinance. No impact would occur.

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
6.4. ENERGY - Would the project:					
Issue 1: Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☐	☒	☐

Project construction would require the use and operation of heavy equipment; however, such activities would be temporary and short term in nature and would therefore not require the consumption of substantial amounts of energy. Energy use during project operations over the long term would be decreased through the incorporation of design measures that reduce energy demands. The project has been designed to exceed current CALGreen and California Energy Code standards (CCR, Title 24, Part 6), as well as to achieve a LEED Gold standard, and would incorporate energy-saving features, such as high efficiency lighting, energy-efficient appliances (i.e., low-flow fixtures), water-efficient irrigation, and drought-tolerant landscaping. Additionally, transportation-related sustainability features that would reduce energy consumption would include provision of on-site bike racks and bike lockers/storage; shower facilities; electric vehicle charging stations; promotion of alternative transportation programs; carpool priority parking; and discount transit passes and a bikeshare program for employees. Additionally, the project would be required to demonstrate consistency with the City's CAP, which requires incorporation of energy-saving measures to meet the City's adopted thresholds related to GHG emissions; refer also to Section 6.6, Greenhouse Gas Emissions.

As designed, and with demonstrated conformance with applicable Title 24 requirements, as well as achieving a LEED Gold standard, project construction and operation would not result in a significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources. Impacts would be less than significant.

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

Refer to Section 6.4, Issue 1, above. The project as proposed would be consistent with the City's General Plan and the University Community Plan's land use designation of Scientific Research, and would therefore be in compliance with future development expectations for the property. Further, as discussed above, the project would be required to comply with the City's CAP and would incorporate energy-reducing design measures to minimize project energy demands. As the CAP has been adopted to ensure City compliance with state and local energy goals, the project would not conflict with or obstruct such plans aimed at renewable energy or energy efficiency. Impacts would be less than significant.

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
6.5. GEOLOGY/SOILS/SEISMICITY - Would the project:					
Issue 1: Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure, including liquefaction, or landslides?	☐	☐	☐	☒	☐

Southern California, including the project site, is subject to the effects of seismic activity because of active faults that traverse the region. Active faults are defined as those that have experienced surface displacement within Holocene time (approximately the last 11,000 years) and/or are in a state-designated Alquist-Priolo Earthquake Fault Zone. The nearest known active faults to the City are the Newport-Inglewood (offshore) and Rose Canyon Faults and the dominant source of potential ground motion.

Based on the City of San Diego Seismic Safety Study, Geologic Hazards and Faults, Map Sheet 34, a concealed fault defined as Fault Zone 12: Potentially Active, Inactive, Presumed Inactive, or Activity Unknown is mapped approximately 1,850 feet northwest of the project site, trending in a northeast to southwest direction (Geocon Incorporated 2022; see Appendix C). Based on the distance of the concealed fault, it is not anticipated to impact the proposed development of the site.

Although no active faults traverse the project site, all new development would be required to comply with the requirements of the Alquist-Priolo Fault Zoning Act and the California Building Code. California Building Code requirements address structural seismic safety and include design criteria for seismic loading and other geologic hazards. The California Building Code includes provisions for buildings to structurally survive an earthquake without collapsing and measures such as anchoring to the foundation and structural frame design.

Furthermore, site-specific geotechnical studies have been prepared for the proposed project which provide site-specific geotechnical recommendations for each building, including pad compaction levels, foundation requirements, wall footing design parameters, and other recommendations to ensure all buildings are constructed to appropriate engineering requirements. Compliance with such measures would minimize potential safety risks caused by strong seismic shaking and/or fault rupture. Additionally, the site is relatively flat and does not support steep slopes that may be subject to landslides. The potential for liquefaction and seismically induced settlement occurring within on-site soils is considered to be very low due to the dense nature of the fill, Very Old Paralic Deposits and Scripps Formation and lack of groundwater within 50 feet of the ground surface (Geocon Incorporated 2022; see Appendix C).

The project would be required to comply with seismic requirements of the California Building Code and utilize proper engineering design and standard construction practices (to be verified at the building permit stage) to ensure that potential impacts to people or structures would be reduced to an acceptable level of risk. The project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure, including liquefaction, or landslides. Impacts would be less than significant.

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
Issue 2: Result in substantial soil erosion or the loss of topsoil?	☐	☐	☐	☒	☐

Refer to Section 6.9, Hydrology and Water Quality, below. Soil erosion may result during project construction, as grading and construction can loosen surface soils and make soils susceptible to the effects of wind and water movement across the surface. All grading activities would be required to comply with the City Grading Ordinance, which ensures soil erosion and topsoil loss is minimized through the issuance of a Grading Permit. Grading permits typically require projects to implement measures to prevent surface waters from damaging the face of any excavation or fill, ensuring erosion is minimized. Additionally, a SWPPP that specifies BMPs to prevent grading/construction-related pollutants (including sediment from erosion) from contacting stormwater and moving off-site into receiving waters, as well as elimination/reduction of non-stormwater discharges, would be implemented during construction. Further, all project construction activities would occur in conformance with the recommendations of the *Stormwater Quality Management Plan* prepared for the project (Michael Baker 2022; refer to Appendix F-1). Refer to Section 6.9, Hydrology and Water Quality, for additional discussion.

With conformance to applicable federal, state, and local regulations, and implementation of appropriate construction and post-construction BMPs, the project would not result in substantial soil erosion or the loss of topsoil. Impacts would be less than significant.

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

Liquefaction is typified by a loss of shear strength in the affected soil layer, thereby causing the soil to behave as a viscous liquid. Both research and historical data indicate that loose, saturated, granular soils are susceptible to liquefaction and dynamic settlement; liquefaction and dynamic settlement of soils can be caused by strong vibratory motion due to earthquakes.

Based on the evaluation of the project site, the potential for liquefaction is considered very low due to the presence of dense, Very Old Paralic Deposits, Scripps Formation, and planned engineered fill. Considering planned grading and foundation design measures, the potential for dynamic settlement on-site is also considered insignificant. Further, based on the low susceptibility to liquefaction and the formational material unit underlying the site, the possibility of earthquake-induced lateral spreading is not anticipated. Subsidence is also not anticipated to be a design factor due to the underlying Very Old Paralic Deposits (Geocon Incorporated 2022; refer to Appendix C).

The project would be required to comply with seismic requirement of the California Building Code, utilize proper engineering design and standard construction practices, to be verified at the building permit stage, in order to ensure that would reduce impacts to people or structures to an acceptable level of risk. Additionally, the project would comply with the recommendations of the geotechnical studies prepared for the subject site (see Appendix C).Therefore, the project would be located on a

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

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. Impacts would be less than significant.

Issue 4: Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☐	☒	☐

Expansive soils contain significant amounts of clay particles that swell considerably when wetted and shrink when dried. According to findings in the *Geotechnical Investigation* the majority of the on-site material is expected to have a "very low" to "medium" expansion potential (Geocon Incorporated 2022; see Appendix C). Therefore, development of the project site as proposed is not anticipated to result in substantial direct or indirect risks to life or property as the result of being located on expansive soils. The project would be required to comply with seismic requirements of the California Building Code and to utilize proper engineering design and standard construction practices (to be verified at the building permit stage), in order to ensure that impacts to people or structures would be reduced to an acceptable level of risk. Accordingly, impacts would be less than significant.

6.6. GREENHOUSE GAS EMISSIONS - Would the project:

Issue 1: Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☐	☒	☐

The CAP Consistency Checklist is utilized for this project to ensure consistency with the underlying assumptions in the 2015 CAP, and to ensure that the City would achieve its emission reduction targets identified in the CAP. As stated above under Section 6.1, Land Use, the City recently adopted its current CAP, effective October 23, 2022; however, the proposed project was previously deemed complete prior to the effective date, and therefore, relies instead on the previously adopted 2015 CAP and CAP Consistency Checklist.

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

The project has been found to be consistent with the Checklist; refer to Appendix D, CAP Consistency Checklist. The following summarizes that determination based on the various items included on the Checklist. Further, project compliance with the Checklist would be made a condition of approval of the discretionary permit to ensure conformance.

Land Use Consistency

1. The University Community Plan identifies the project site as a RS-1-14, zoned for residential use. The project would require a Community Plan Amendment to amend the plan to the

mixed-use EMX-2 zone and allow for the construction of an R&D use. The project would increase employment density within a TPA and implement CAP Strategy 3 actions.

Furthermore, completion of Step 2 of the CAP Consistency Checklist demonstrates that the project would be consistent with applicable strategies and actions for reducing GHG emissions. This includes project features consistent with the energy and water efficient buildings strategy (e.g., low flow fixtures and fittings), as well as bicycling (e.g., provision of on-site bicycle parking and showers), walking (connection to off-site sidewalk network), transit (e.g., participation in the iCommute Program), and land use strategy.

The project would implement a Transportation Demand Management Program that would include the following:

- Unbundled Parking - All on-site parking would be provided in conformance with City parking regulations and with respect for the site being located in a TPA. A total of 938 on-site parking spaces are proposed. Unbundled parking would be provided whereby parking spaces would be leased or sold separately from the rental or purchase fees for the development for the life of the development.

- SANDAG iCommute and RideMatcher Programs - Commitment to maintaining an employer network in the SANDAG iCommute program and promoting its RideMatcher service to tenants/employees.

- Access to Services - The project site is located in an area where services are located within 1,320 feet (one-quarter mile) which reduces the need to drive to access such services. Additionally, the project proposes an on-site market, food and beverage space, and conference space(s) for tenant and employee use that would reduce the need for vehicle trips to access other services in the surrounding area. The project would also provide pedestrian connectivity through a pedestrian access network that would link to existing external streets and pedestrian facilities contiguous with the project site in order to promote pedestrian trips to surrounding services off-site.

- Flexible or Alternative Work Hours - Allowing employees to work flexible or alternative hours to reduce the number of employees commuting during peak hours. Implemented by not allowing mass starts/stops during the workday as specified in individual leases.

Based on project conformance with the City's CAP Consistency Checklist, the project's contribution of GHG emissions to cumulative statewide emissions are considered less than cumulatively considerable. Therefore, the project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment. Impacts would be less than significant.

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
Issue 2: Conflict with City's Climate Action Plan or another applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☐	☒	☐

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

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

The routine transport, use, and disposal of hazardous materials can result in potential hazards to the public through accidental release. Such hazards are typically associated with certain types of land uses, such as chemical manufacturing facilities, industrial processes, waste disposal, and storage and distribution facilities. None of these uses are proposed by the project; rather, the project would consist of scientific research and development uses and accessory/amenity space.

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

The proposed project may result in temporary hazards related to the transport and use of hazardous materials, including those associated with construction vehicle use and maintenance (e.g., diesel fuel, motor oil, etc.). To reduce potential hazardous effects from such activities (e.g., polluted stormwater runoff from the site), the project would prepare and implement a stormwater pollution prevention plan, consistent with applicable regulations. Once operational, the project would not result in the routine transport, use, or disposal of hazardous materials due to the nature of the land uses proposed. Project operations would not generate hazardous waste. Impacts in this regard would be less than significant.

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

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

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

The nearest school is the Eastgate Christian School located approximately 0.25 miles to the west of the project site. Operation and maintenance of the project would not produce hazardous emissions; refer to Section 6.7, Issue 1, above. Therefore, the project would not result in impacts related to hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. No impact would occur in this regard.

Issue 4: Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☐	☒

Refer to Section 6.7, Issue 1, above. Hazardous materials sites pursuant to Government Code Section 65962.5 are typically associated with certain types of land uses, such as chemical manufacturing facilities, industrial processes, waste disposal, and storage and distribution facilities. None of these uses are currently conducted on-site as the subject property currently supports scientific research uses.

A search of potential hazardous materials sites compiled pursuant to Government Code Section 65962.5 was completed for the project site. Based on the searches conducted, the project site is not identified on a list of hazardous materials sites (State Water Resources Control Board 2022; DTSC 2022). As the project site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, the project would not create a significant hazard to the public or the environment in this regard. No impact would occur.

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
Issue 5: Result in a safety hazard for people residing or working within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport?	☐	☐	☐	☒	☐

The project site is located within Review Areas 1 and 2 of the MCAS Miramar's AIA. Within Review Area 1, certain types of land use actions, including rezones and plan amendments, are to be submitted to the ALUC for review and consistency determination with the ALUCP for MCAS Miramar. The project site is located within the 60-65 a-weighted dBA community noise equivalent level (CNEL), within the Safety Transition Zone, and within the Airspace Protection Compatibility Zone.

The City of San Diego Development Services Department received a letter dated March 18, 2022 from the U.S. Marine Corps in regard to the proposed project recognizing that the project site is located within the 60-65 dBA CNEL noise contour of the 2020 MCAS Miramar Air Installations Compatible Use Zones (AICUZ) Update (refer also to Appendix A, Airport Land Use Compatibility Documentation). The site is subject to multiple flight corridors and will experience overflight and noise from operations. However, the Marine Corps indicated that the project as proposed is consistent with AICUZ noise criteria. Further, the project has been designed with respect for land use and height limitations for the area and would not cause a significant environmental impact relative to noise or hazardous conditions.

The project site is located within Federal Aviation Administration (FAA) Part 77 Noticing Area for the MCAS Miramar Airport Land Use Compatibility Plan (ALUCP) and is required to obtain an FAA Part 77 Notice of Determination Letter. However, consistent with FAA allowances, the project applicant has completed self-certification of the project. A note has been added to the improvement plans to indicate that the City does not require notification to the FAA if a professional, licensed by the state of California to prepare construction documents, provides a certification on the plans along with their registration and stamp and signature, as allowed per Section 77.15(A) of Title 14 of the Code of Federal Regulations CFR Part 77.

Additionally, the project is required to obtain a determination of consistency from the San Diego County Regional Airport Authority, which acts as the Airport Land Use Commission (ALUC) for San Diego County. A letter was received from the County ALUC on May 2, 2022 indicating that the site lies within the Airport Influence Area (AIA) for the Marine Corps Air Station (MCAS) Miramar Airport Land Use Compatibility Plan (ALUCP). The letter indicated that the ALUC had reviewed the project and determined that, in accordance with the San Diego Regional Airport Authority Policy 8.30 and applicable provisions of the State Aeronautics Act (Cal. Pub. Util. Code §21670-21679.5), the project is conditionally consistent with the MCAS Miramar ALUCP, based upon the findings summarized in the letter. Therefore, the project has been designed in accordance with relevant height and safety regulations pertaining to airport operations and is in conformance with allowed use of the subject site; refer to Appendix A for a copy of the determination letter.

Therefore, the project would not result in a safety hazard for people residing or working within an airport land use plan. Impacts would be less than significant.

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
Issue 6: Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☐	☒

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

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

Issue 1: Result in an alteration, including the adverse physical or aesthetic effects and/or destruction of a historic building (including architecturally significant building) structure, object, or site?	☐	☐	☐	☐	☒

The City's criteria for determination of historic significance, pursuant to CEQA, is evaluated based upon age (over 45 years), location, context, association with an important event, uniqueness, or structural integrity of the building. In addition, projects requiring the demolition of structures that are 45 years or older are also reviewed for historic significance in compliance with CEQA. CEQA Section 21084.1 states, "A project that may cause a substantial adverse change in the significance of a historical resource is a project that may cause a significant effect on the environment."
A *Cultural Resources Identification Report* was prepared by Michael Baker International (2022; see Appendix E) to analyze the potential for cultural resources to be impacted by the proposed project. Preparation of the report included a records search at the South Coast Information Center on August 29, 2019 and a literature and historical map review. No resources were identified within the project area; three resources were identified within a quarter-mile search radius; refer to Appendix E.

The site currently supports several on-site office buildings which are connected below grade by subterranean parking. The project site is located in a heavily urbanized setting surrounded by existing development, such as commercial and mixed-use developments. The on-site structures were constructed in 1988-1989, making the buildings approximately 32 years of age (Michael Baker 2022; see Appendix E). The existing structures on the site are therefore less than 45 years of age and do not meet the City's criteria for determination of historic significance. No other on-site objects or components of the site are considered to be of potential historical value.

Therefore, proposed on-site demolition activities would not result in alteration and/or destruction of a historic building, structure, object, or site. No impact to historic resources would occur.

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
Issue 2: Result in a substantial adverse change in the significance of a prehistoric or historic archaeological resource, a religious or sacred site, or the disturbance of any human remains those interred outside of formal cemeteries?	☐	☐	☒	☐	☐

The purpose and intent of the San Diego Historical Resources Regulations of the Land Development Code (Chapter 14, Article 3, Division 2) are to protect, preserve and, where damaged, restore the historical resources of San Diego. The regulations apply to all proposed development within the City of San Diego when historical resources are present on the premises. CEQA requires that before approving discretionary projects, the lead agency must identify and examine the significant adverse environmental effects, which may result from that project. A project that may cause a substantial adverse change in the significance of a historical resource may have a significant effect on the environment (Sections 15064.5[b] and 21084.1). A substantial adverse change is defined as demolition, destruction, relocation, or alteration activities, which would impair historical significance (Sections 15064.5[b][1]). Any historical resource listed in, or eligible to be listed in the California Register of Historical Resources, including archaeological resources, is considered to be historically or culturally significant.

As part of the *Cultural Resources Identification Report,* a records search from the South Coastal Information Center was conducted to determine whether the project could result in adverse impacts to historical resources (archaeological or built environment) in accordance with CEQA. The South Coastal Information Center, as part of the California Historical Resources Information System, California State University, San Diego, an affiliate of the California Office of Historic Preservation, is the official state repository of cultural resources records and reports for San Diego County. As part of the records search, the following federal and California inventories were reviewed:

- California Inventory of Historic Resources (OHP 1976)
- California Points of Historical Interest (OHP 1992 and updates)
- California Historical Landmarks (OHP 1996)
- Directory of Properties in the Historic Property Data File (OHP 2012). The directory includes the listings of the National Register of Historic Places (National Register), National Historic Landmarks, California Register of Historical Resources (California Register), California Historical Landmarks, and California Points of Historical Interest.

The SCIC records search, literature, and historical map review identified no historical or archaeological resources, as defined by CEQA Section 16054.5 (a), within the project area (Michael Baker 2022; Appendix E). The project site appears to have low to moderate sensitivity for buried archaeological resources based on proximity of previously recorded archaeological sites in the vicinity. There are no known archaeological resource concerns on the project site; therefore impacts would be less than significant and mitigation would not be required.

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

Based on existing site conditions, the results of the cultural resources database searches, and consultations with the affected tribes, it is not anticipated that the project would result in a significant impact relative to tribal cultural resources. No mitigation measures or construction monitoring are required. Impacts would be less than significant.

Issue 3: Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:					
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k); or,					
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☐	☒	☐	☐

Response to Issue 3a: The project would not cause a substantial adverse effect to tribal cultural resources, as there are no recorded sites listed or sites eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined by the Public Resources Code. Refer also to discussion under Issues 1 and 2, above. No impact would result.

Response to Issue 3b: Tribal Cultural Resources include sites, features, places, cultural landscapes, and sacred places or objects that have cultural value or significance to a Native American Tribe. Tribal Cultural Resources include “non-unique archaeological resources” that, instead of being important for “scientific” value as a resource, can also be significant because of the sacred and/or cultural tribal value of the resource. Tribal representatives are considered experts appropriate for providing substantial evidence regarding the locations, types, and significance of tribal cultural resources within their traditionally and cultural affiliated geographic area (PRC § 21080.3.1(a)).

Pursuant to the requirements of Senate Bill 18 (SB 18), which requires tribal notification prior to the adoption or amendment of a city or county’s general plan, the City provided written notice of the proposed project to relevant Native American tribes on April 13, 2020. Additionally. in accordance with the requirements of PRC Section 21080.3.1, Assembly Bill (AB) 52, the City notified Native American tribes that are traditionally and culturally affiliated with the project area. Notification letters were sent on April 13, 2020 informing the tribes of the proposed project and asking them of any knowledge or information about tribal cultural resources they may have about the project area. Both the Jamul Indian Village and Iipay Nation of Santa Ysabel Native American Tribes responded within the notification period, concurring with staff’s determination. Therefore, the consultation process was concluded.

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

Based on the result of the and consultation with the affected tribes, it is not anticipated that the project would have a significant impact on tribal cultural resources, and no mitigation measures or construction monitoring are required. Impacts would be less than significant in this regard.

6.9. HYDROLOGY/WATER QUALITY - Would the project:

Issue 1: Result in flooding due to an increase in impervious surfaces or changes in absorption rates, drainage patterns, or the rate of surface runoff?	☐	☐	☐	☒	☐

Natural water bodies, such as streams and rivers, do not occur on-site or near the project site. As the subject site is fairly level, no mass grading is required or proposed. It is anticipated that necessary earthwork would require a total cut of approximately 315,000 cubic yards, mainly to accommodate the three levels of subterranean parking, and a total fill of approximately 100 cubic yards Therefore, approximately 314,900 cubic yards of soil would be exported off-site and disposed of at a licensed facility.

The project would replace the existing commercial development that is present on-site. According to the *Stormwater Quality Management Plan* prepared for the project, the project would almost entirely be developed with impervious surfaces (Michael Baker International 2022; refer to Appendix F-1). The proposed site plan calls for approximately 95% impervious under proposed conditions, which has been accounted for in the stormwater mitigation calculations; pervious portions of the site would primarily be limited to ornamental landscaping.

The project would be designed to accommodate all on-site stormwater flows to ensure that runoff from the site does not result in an increase in rate or volume from the property as compared to the proposed condition. Pursuant to the City's Stormwater Standards Manual, the project would be designed to ensure that there would be no measurable increase of pollution (including sediment) in runoff from the site; no slope erosion; water velocity moving off-site would not be greater than preconstruction levels; and development would preserve the natural hydraulic features. The project would meet these requirements by creating and implementing a series of stormwater BMPs and detention facilities specifically designed for the project.

As applicable, adherence to the requirements of the City's Stormwater Standards Manual may require implementation of Low Impact Development (LID) practices to improve surface drainage conditions or, at a minimum, not exacerbate flooding or cause erosion. Proposed landscaping would further increase infiltration. The project would also be required to design all drainage facilities in compliance with the City's Drainage Design Manual. Through conformance with the guidelines provided in the manual, project drainage facilities would be designed to avoid drainage-related impacts.

Therefore, the project is not anticipated to result in flooding due to an increase in impervious surfaces or changes in absorption rates, drainage patterns, or the rate of surface runoff. Impacts would be less than significant as a result of project implementation.

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

Generally, stormwater runoff (both dry and wet weather) discharges into storm drains and/or flows directly to creeks, rivers, lakes, and the ocean. Polluted runoff can have harmful effects on drinking water, recreational water, and wildlife. Stormwater characteristics depend on site conditions (e.g., land use, impervious cover, pollution prevention, type and number of BMPs), rain events (duration, amount of rainfall, intensity, and time between events), soil type and particle sizes, multiple chemical conditions, the amount of vehicular traffic, and atmospheric deposition. Major pollutants typically found in runoff include sediments, nutrients, oxygen-demanding substances, heavy metals, petroleum hydrocarbons, pathogens, and bacteria. The majority of stormwater discharges are considered nonpoint sources and are regulated by a NPDES Municipal General Permit or Construction General Permit.

The project site is located in the Miramar Hydrologic Area (906.40) within the Peñasquitos Hydrologic Unit (906.00) (Michael Baker 2022); see Appendix F-1). The total drainage area of the Los Peñasquitos watershed covers approximately 100 square miles. As such, the approximately 3.97-acre project site represents a limited portion of the total watershed. Stormwater from the project site eventually discharges to Rose Creek, Mission Bay, and the Pacific Ocean. The primary pollutants of concern are nutrients and heavy metals. Rose Creek is impaired for selenium and toxicity pursuant to the 2010 303(d)[1] list of water quality limited segments. In addition, Mission Bay at the mouth of Rose Creek is 303(d) listed for eutrophic and lead.

Short-Term Construction

Construction grading, excavation, and other construction activities associated with the proposed project are anticipated to have a negligible impact on water quality or wastewater. Site preparation would consist of demolition of the existing on-site buildings and surface parking lot. The subject site is fairly level under existing conditions. It is anticipated that necessary earthwork would require a total cut of approximately 315,000 c.y., mainly to accommodate the three levels of subterranean parking, and a total fill of approximately 100 c.y. Therefore, approximately 314,900 c.y. of soil would be exported off-site and disposed of at a licensed facility. Grading would be accomplished with scrapers, motor graders, water trucks, dozers, and compaction equipment. Building materials would be off-loaded and installed using small cranes, boom trucks, forklifts, rubber-tired loaders, rubber-tired backhoes, and other small- to medium-sized construction equipment as needed. Existing on-site vegetation would be removed to allow for construction of the proposed development.

Impacts to water quality due to sheet erosion resulting from exposed soils and the subsequent deposition of particles and pollutants in off-site drainage areas are not anticipated. Construction controls to minimize water quality impacts are not necessarily the same measures used for long-term water quality management, as construction-related water quality control measures are temporary in nature and specific to the type of construction. Development would be subject to

1 Waters identified on the "303(d) list" are those waters listed by a state as being impaired or threatened waters (e.g., stream/river segments, lakes). States are required to submit their list of impaired or threatened waters for US Environmental Protection Agency approval every two years. For each water on the list, the state identifies the pollutant causing the impairment, when known.

compliance with NPDES permit requirements to effectively control non-stormwater discharges to the stormwater conveyance system and to reduce pollutants in stormwater discharges, including those pollutants taken up by stormwater as it flows over urban areas, to the maximum extent practicable to achieve applicable receiving water quality objectives.

A SWQMP and Drainage Study have been prepared for the proposed project by Michael Baker International (2022; refer to Appendices F-1 and F-2, respectively). The SWQMP includes site design and source control BMPs to help ensure stormwater runoff and impervious areas are minimized, as well as a treatment control BMP for post-construction runoff. The project would be required to comply with the hydromodification flow control requirements consistent with the current City Stormwater Standards and would provide LID and BMPs, as applicable, per the City's Stormwater Standards during construction and post-construction and as outlined in the SWQMP. As such, the proposed vault has been designed as a conjunctive-use BMP to provide both hydromodification flow control and attenuate post-development 100-year peak flow to less than existing conditions. The Drainage Study outlines the existing, un-mitigated proposed, and mitigated proposed peak flow discharge from the site and includes 100-year routing through the proposed vault.

With implementation of an approved SWQMP and compliance with the NPDES, short-term construction activities would not violate water quality standards or waste discharge requirements, nor would the project result in a substantial increase in pollutant discharge to receiving waters or increase of identified pollutants to an already impaired water body. A less than significant impact to water quality would occur.

Long-Term Operations

Potential pollutants resulting with long-term occupancy and operation of the project include litter, trash, and debris; oil, grease, metals, and toxic chemicals from vehicle hydrocarbons; and sediments, nutrients, pesticides, and fertilizers from landscaped areas.

The existing drainage system in the project vicinity is entirely urban and developed. Natural drainage pathways or hydrologic features do not currently exist on-site. The existing drainage network consists of catch basins and area drains that collect runoff from the existing parking area and roof area. According to the SWQMP, runoff collected by the existing drainage system is conveyed to the southwest corner of the property where it is discharged to a public main with Executive Drive through an 18-inch reinforced concrete pipe.

The project design includes a drainage network designed to control and treat stormwater runoff on-site in conformance with requirements of the San Diego RWQCB and the City of San Diego. Off-site flows are not anticipated to enter the project area. As designed, the project would incorporate an underground storage vault with a modular wetland system (MWS) for stormwater treatment. Runoff from the proposed parking structure will be collected from the roof of the structure and directed to the proposed vault and MWS. Proposed storm drains around the site perimeter will collect the remaining runoff which will confluence with the rooftop runoff and flow through the on-site vault and MWS at the southeast corner of the property. Mitigated runoff is discharged from the site as pipe flow connecting to the City's MS4 system located in Executive Drive.. The discharge location and configuration is consistent with the existing condition. After entering the public storm drain system,

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

runoff from the site would be conveyed south to Rose Creek which flows southwards into Mission Bay and then to the Pacific Ocean.

Long-term project operation activities are not anticipated to result in a substantial increase in pollutant discharge to receiving waters and increase of identified pollutants to an already impaired water body. Therefore, impacts would be **l**ess than significant.

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

The project would replace the existing commercial development that is present on-site under current conditions. The project would connect to the existing public infrastructure system operated by the City of San Diego's for water service; the use of groundwater is not proposed. Further, the project would not pump groundwater or substantially interfere with groundwater recharge as the project has been designed to accommodate landscaped areas and on-site stormwater improvements that would allow for groundwater infiltration and ensure that groundwater quality is maintained (e.g., via BMPs).

Therefore, the project as proposed would not deplete groundwater supplies, degrade groundwater quality, or substantially interfere with groundwater recharge. Impacts to groundwater resources in this regard would be less than significant.

6.10. NOISE - Would the project:

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

An *Acoustical Assessment* was prepared for the project by Michael Baker International (2022). Refer to Appendix G, *Acoustical Assessment*, for additional discussion.

Table 6.10-1, Noise Measurements, shows the existing ambient noise levels in the project area; refer also to Figure 5, Noise Measurement Locations and Sensitive Receptors, of Appendix G. Existing measured noise levels ranged from 58.6 to 63.3 dBA L_{eq} in the project vicinity. Other noise sources observed include heating, ventilation, and air conditioning (HVAC) units on nearby buildings, birds calling, and wind in trees.

TABLE 6.10-1. NOISE MEASUREMENTS

Site No.	Location	L_{eq} (dBA)	L_{min} (dBA)	L_{max} (dBA)	Time
ML1	Towne Centre Drive	58.6	61.3	69.9	3:45 p.m.
ML2	Eastgate Mall	63.3	56.3	71.5	4:10 p.m.
ML3	Judicial Drive	59.2	52.9	73.2	4:35 p.m.

Notes: dBA = A-weighted decibels; L_{eq} = Equivalent Sound Level; L_{min} = Minimum Sound Level; L_{max} = Maximum Sound Level
Source: *Acoustical Assessment*, Michael Baker International. See Appendix G.

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

Construction

Construction of the project would include demolition, grading, paving, building construction, and architectural coatings. Groundborne noise and other types of construction-related noise impacts would typically occur during excavation activities in the grading and construction phases. Table 6.10-2, Maximum Noise Levels Generated by Construction Equipment, indicates the anticipated noise levels of construction equipment. It should be noted that the noise levels identified are maximum sound levels (L_{max}), which are the highest individual sound occurring at an individual time period. Operating cycles for these types of construction equipment may involve one or two minutes of full power operation followed by three to four minutes at lower power settings. Other primary sources of acoustical disturbance would be due to random incidents, which would last less than one minute (such as dropping large pieces of equipment or the hydraulic movement of machinery lifts).

TABLE 6.10-2. MAXIMUM NOISE LEVELS GENERATED BY CONSTRUCTION EQUIPMENT

Equipment Type	Actual L_{max} at 50 Feet (dBA)	Actual L_{max} at 220 Feet[1] (dBA)
Backhoe	78	65
Bulldozer	82	69
Compactor	82	69
Compressor	78	65
Concrete Mixer	79	66
Concrete Pump	81	68
Crane, Mobile	81	68
Dump Truck	76	63
Excavator	81	68
Generator	81	68
Grader	85	72
Impact Pile Driver	101	88
Loader	79	66
Paver	77	74
Pump	81	68
Roller	80	67
Tractor	84	71
Flatbed Truck	74	61
Welder	74	61

Notes:
dBA = A-Weighted Decibel; L_{max} = Maximum Sound Level
1 Distance from the closest sensitive receptor to the project boundary.
Source: Federal Highway Administration, *Roadway Construction Noise Model User's Guide,* January 2006.

The nearest sensitive receptor (residential use) is located approximately 220 feet southwest of the project boundary. As shown in Table 6.10-2, construction equipment noise levels would range between 61 dBA and 88 dBA at a distance of 220 feet. Using the Federal Highway Administration's (FHWA) Roadway Construction Noise Model and construction information, the estimated noise levels from construction were calculated for the nearest sensitive receptor; refer to Table 6.10-3, Construction Noise Model Results Summary.

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

TABLE 6.10-3. CONSTRUCTION NOISE MODEL RESULTS SUMMARY

ID	Distance from Receptor Site to Project Boundary (feet)	Land Use	Demolition (dBA L_{eq})	Grading (dBA L_{eq})	Building Construction (dBA L_{eq})	Paving (dBA L_{eq})	Architectural Coating (dBA L_{eq})
Unmitigated							
1	220	Residential	71.7	73.4	81.6	70.6	60.8
			73.4 When these two construction phases overlap				
					82.0 When these three construction phases overlap		
Mitigated							
1	220	Residential	51.7	53.4	61.6	50.6	40.8
			53.4 When these two construction phases overlap				
					62.0 When these three construction phases overlap		

Notes: dBA = A-Weighted Decibel; L_{eq} = Equivalent

Source: *Acoustical Assessment*, Michael Baker International. 2022; see Appendix G.

The City's Noise Ordinance states that construction noise may not exceed 75 dBA L_{eq} at or beyond the property line of a residentially zoned property. The noise levels presented in Table 6.10-3 are conservative as these noise levels assume the simultaneous operation of all construction equipment at the same precise location. In reality, construction equipment would be used throughout the project site and would not be concentrated at the point closest to the sensitive receptors. It should also be acknowledged that construction activities would occur during normal daytime hours (between 7:00 a.m. and 7:00 p.m. Monday through Saturday) to avoid noise disturbances at nearby receptors during the more sensitive hours (between 7:00 p.m. and 7:00 a.m.).[2]

As depicted in Table 6.10-3, project construction noise levels would range from 60.8 dBA L_{eq} to 82.0 dBA L_{eq} at the nearest sensitive receptor. Construction phases may overlap during the demolition and grading phases, as well as the building construction, paving, and architectural coating phases. During the time when the demolition and grading phases would occur at the same time, the combined noise level would be approximately 73.4 dBA L_{eq} at the nearest residential sensitive receptor. Similarly, the noise level generated during the overlapping building construction, paving, and architectural coating phases would be approximately 82.0 dBA L_{eq} at the nearest residential sensitive receptor. Thus, construction noise levels would exceed the 75 dBA L_{eq} threshold during the overlapping building construction, paving, and architectural coating phases, and a significant impact would occur.

Noise source control is the most effective method of controlling construction noise. Source controls, which limit noise, are the easiest to oversee on a construction project. Mitigation at the source reduces the problem everywhere, not just along one single path or for one receiver. Noise path controls are the second method in controlling noise. Barriers or enclosures can provide a substantial reduction in the nuisance effect in some cases. Path control measures include moving equipment

2 It is not anticipated that project construction would occur at night (7:00 p.m. to 7:00 a.m.), on Sundays, or on legal holidays.

farther away from the receiver; enclosing especially noisy activities or stationary equipment; erecting noise enclosures, barriers, or curtains; and using landscaping as a shield and dissipater.

Noise barriers or enclosures can provide a sound reduction up to 20 dBA or greater. To be effective, a noise enclosure/barrier must physically fit in the available space, must completely break the line of sight between the noise source and the receptors, must be free of degrading holes or gaps, and must not be flanked by nearby reflective surfaces. Noise barriers must be sizable enough to cover the entire noise source, and extend length-wise and vertically as far as feasibly possible to be most effective. The limiting factor for a noise barrier is not the component of noise transmitted through the material, but rather the amount of noise flanking around and over the barrier. In these cases, the enclosure/barrier system must either be very tall or have some form of roofed enclosure to protect upper-story receptors.

Therefore, A Mitigation, Monitoring, and Reporting Program as detailed in Section IV. of the Tiered Mitigated Negative Declaration would be required. With implementation of the monitoring program, potential impacts on noise would be reduced to below a level of significance.

Operations

Vehicle Traffic Noise

The project would increase traffic volumes on local roadways. The project is forecasted to generate approximately 2,959 ADT. Traffic noise modeling was conducted using the FHWA's Highway Noise Prediction Model (FHWA RD-77-108). The noise model calculates the average noise level at specific locations based on traffic volumes, average speeds represented by the posted speed limit, roadway geometry, and site environmental conditions. Street segment traffic noise calculations for "Opening Year Without Project" and "Opening Year With Project" conditions are detailed in Appendix A of Appendix G.

The "Opening Year Without Project" and "Opening Year With Project" scenarios are compared in Table 6.10-4, Opening Year (2027) Traffic Noise Levels With and Without Project. Under the "Opening Year Without Project" scenario, noise levels would range from approximately 56.9 dBA to 64.5 dBA at 100 feet from the roadway centerline, with the highest noise levels occurring along the Towne Centre Drive segment from Executive Drive to Towne Centre Driveway. The "Opening Year With Project" scenario noise levels would range from approximately 57.2 dBA to 64.6 dBA at 100 feet from the roadway centerline, with the highest noise levels also occurring along the Towne Centre Drive segment from Executive Drive to Towne Centre Driveway.

As shown in Table 6.10-4, project-related traffic would result in a less than 1 dBA increase in traffic noise over existing without project conditions for all roadway segments. As previously indicated, an increase of 3 dBA or greater would result in a significant impact, based on the City's adopted significance thresholds Therefore, impacts related to project-generated traffic noise would be less than significant.

TABLE 6.10-4. OPENING YEAR (2027) TRAFFIC NOISE LEVELS WITH AND WITHOUT PROJECT

Roadway Segment	Traffic Volume (ADT) Opening Year		Noise Level (CNEL) at 100 feet from Roadway Centerline Opening Year		
	Without Project	With Project	Without Project	With Project	Noise Increase
Towne Centre Drive					
Eastgate Mall to Project Driveway "A"	18,262	19,151	62.9	63.1	0.2
Project Driveway "A" to Executive Drive	18,541	19,430	63.1	63.3	0.2
Executive Drive to Towne Centre Driveway	26,140	26,709	64.5	64.6	0.1
Towne Centre Driveway to La Jolla Village	25,988	26,557	64.4	64.5	0.1
Judicial Drive					
Executive Drive to Judicial Driveway	10,179	10,890	60.5	60.8	0.3
Judicial Driveway to Golden Haven Drive/Brook Lane	10,473	11,184	60.6	60.9	0.3
Executive Drive					
Towne Centre Drive to Project Driveway "B"	7,832	8,384	56.9	57.2	0.3
Project Driveway "B" to Judicial Drive	7,832	8,384	56.9	57.2	0.3

Notes: ADT = average daily traffic; dBA = A-weighted decibels; CNEL = Community Noise Equivalent Level, "-" = contour located within roadway right of way
Source: *Acoustical Assessment*, Michael Baker international. 2022. See Appendix G.

Stationary Noise Impacts

Mechanical Equipment

The project would require the use of commercial heating, ventilation, and air conditioning (HVAC) units. Commercial-scale HVAC equipment units are generally equipped with noise shielding cabinets, placed on the roof, and not usually significant sources of noise impacts. HVAC units typically result in noise levels that average 55 dBA at 50 feet from the source.[3] Roof-mounted HVAC units would be located as close as 272 feet from the nearest sensitive receptor, located to the southwest of the site. At this distance, HVAC noise levels would be approximately 40 dBA. In addition, the HVAC units would not be visible to the nearest sensitive receptors as a parapet would separate the proposed buildings and receptors, further attenuating the HVAC noise levels by approximately 5 dBA.[4] Therefore, the closest HVAC unit could produce a noise level of approximately 35 dBA. As such, the City's most restrictive multifamily residential noise standard (45 dBA during nighttime hours [10:00 p.m. to 7:00 a.m.]) would not be exceeded as a result of HVAC units at the project site. It should be noted that additional mechanical equipment, including an emergency generator, may be located in the first level of the underground parking garage. As the mechanical equipment would be fully enclosed and not visible to the nearest sensitive receptors, noise from mechanical equipment operations would not be perceptible at the nearest sensitive receptors. Impacts would be less than significant.

Parking Garage

Parking for the project would be provided by a three-level underground parking garage. The proposed parking garage would provide approximately 938 parking spaces for project tenants and employees.

Traffic noise associated with parking lots is typically not of sufficient volume to exceed community noise standards, which are based on a time-averaged scale such as the L_{dn} scale. However, the

[3] U.S. Environmental Protection Agency, Community Noise, 1971.
[4] Federal Highway Administration, *Roadway Construction Noise Model User's Guide*, January 2006.

instantaneous maximum sound levels generated by a car door slamming, engine starting up, and car pass-bys may be an annoyance to adjacent noise-sensitive receptors. Estimates of the maximum noise levels associated with typical parking lot activities are presented in Table 6.10-5.

TABLE 6.10-5. TYPICAL NOISE LEVELS GENERATED BY PARKING LOTS

Noise Source	Maximum Noise Levels at 50 Feet from Source
Car door slamming	61 dBA L_{eq}
Car starting	60 dBA L_{eq}
Car idling	53 dBA L_{eq}

Source: *Acoustical Assessment*, Michael Baker International. 2022. See Appendix G.

As shown, parking lot noise levels range between 53 dBA and 61 dBA at a distance of 50 feet. The nearest sensitive receptor is located approximately 220 feet southwest of the project site. Given the distance and the parking garage being below ground, parking lot noise levels would be negligible at the nearest sensitive receptor. In addition, the project would comply with all Municipal Code ordinances related to stationary noise sources. Therefore, noise related to the proposed underground parking structure would be less than significant.

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

Construction Vibration

Construction activities may generate varying degrees of groundborne vibration, depending on the construction procedure and the construction equipment used. Operation of construction equipment generates vibrations that spread through the ground and diminish in amplitude with distance from the source. The effect on buildings in the vicinity of the construction site often varies depending on soil type, ground strata, and construction characteristics of the receiver building(s). Impacts from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, to slight damage at the highest levels. However, groundborne vibration from construction activities rarely reaches levels that result in damage to structures.

The Federal Transit Administration (FTA) has published standard vibration velocities for construction equipment operations. The types of construction vibration impacts include human annoyance and building damage. Human annoyance occurs when construction vibration rises significantly above the threshold of human perception for extended periods of time. Building damage can be cosmetic or structural. According to the Caltrans *Transportation and Construction Vibration Guidance Manual*, the threshold for structural damage to commercial structures is 0.5 inch-per-second peak particle velocity (PPV) and the human annoyance threshold is 0.2 inch-per-second PPV (Michael Baker 2022; see Appendix G).

Construction activities are anticipated to occur up to the project boundary line, based on the proposed design. Therefore, the nearest structure (i.e., commercial uses) would be located approximately 55 feet to the north of the project site boundary and the nearest noise sensitive receptors (residential uses) would be located approximately 220 feet to the southwest of the project site boundary. As shown in Table 6.10-6, groundborne vibration generated during project

construction activities would range from 0.001 to 0.465 inch-per-second PPV at the nearest structure and from less than 0.001 to 0.058 inch-per-second PPV at the nearest sensitive receptors. Therefore, groundborne vibration generated during project construction activities would not exceed the human annoyance criterion (0.2 inch-per-second PPV) or the structural damage criterion (0.5 inch-per-second PPV). A less than significant impact would occur.

TABLE 6.10-6. TYPICAL VIBRATION LEVELS FOR CONSTRUCTION EQUIPMENT

Equipment		Approximate peak particle velocity at 25 feet (inches/second)	Approximate peak particle velocity at 55 feet (inches/second)	Approximate peak particle velocity at 220 feet (inches/second)
Impact Pile Driver	Upper Range	1.518	0.465	0.058
	Typical	0.644	0.197	0.025
Sonic Pile Driver	Upper Range	0.734	0.225	0.028
	Typical	0.170	0.052	0.007
Vibratory Roller		0.210	0.064	0.008
Large Bulldozer		0.089	0.027	0.003
Loaded Trucks		0.076	0.023	0.003
Jackhammer		0.035	0.011	0.001
Small bulldozer		0.003	0.001	<0.001

Notes:
1. Calculated using the following formula:
   $PPV_{equip} = PPV_{ref} \times (25/D)^{1.5}$
   where: PPV (equip) = the peak particle velocity in in/sec of the equipment adjusted for the distance
   PPV (ref) = the reference vibration level in in/sec from Table 12-2 of the FTA *Transit Noise and Vibration Impact Assessment Guidelines*
   D = the distance from the equipment to the receiver

Source: *Acoustical Assessment*, Michael Baker International. 2022. See Appendix G.

Operational Vibration

The proposed R&D and accessory/amenity uses would not generate groundborne vibration due to typical operational characteristics of such uses. Project operations would not involve railroads or substantial heavy truck operations, and therefore, would not result in potential vibration impacts at surrounding uses. Thus, no impact would occur.

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

The proposed project is located approximately 2.5 miles northwest of MCAS Miramar and is within AIA Review Areas 1 and 2 of the adopted MCAS Miramar ALUCP. The project is located within the airport's 60 dBA CNEL noise contour and therefore must comply with the ALUCP's land use compatibility policies. Similar to the General Plan, the ALUCP considers outdoor noise levels of up to 75 dBA CNEL commercial and industrial uses (e.g., clinical laboratories, office buildings, and eating/drinking establishments) as being conditionally compatible as long as interior noise levels of 50 dBA CNEL can be maintained.

As determined in the *Acoustical Assessment* prepared for the project (Michael Baker 2022), outdoor noise levels in the project vicinity range from 59.2 to 63.3 dBA. Accounting for a 24 dBA exterior-to-

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

interior attenuation factor, interior noise levels following project implementation would be approximately 39.3 dBA or lower (refer to Appendix G). Therefore, the project would be compatible with the ALUCP standards and guidelines (i.e., 75 dBA CNEL exterior noise threshold and 50 dBA CNEL interior noise threshold); no significant noise impact would occur in this regard.

Additionally, the City of San Diego Development Services Department received a letter dated March 18, 2022 from the U.S. Marine Corps in regard to the proposed project recognizing that the project site is located within the 60-65 community noise equivalent level (CNEL) noise contour of the 2020 MCAS Miramar Air Installations Compatible Use Zones (AICUZ) Update (refer to Appendix A, Airport Land Use Compatibility Documentation). The site is subject to multiple flight corridors and will experience overflight and noise from operations. However, the Marine Corps indicated that the project as proposed is consistent with AICUZ noise criteria. Therefore, future occupants of the proposed development would not be exposed to excessive noise levels in this regard.

The project site is not located within the vicinity of a private airstrip or related facilities. No potential noise effects due to such conditions would therefore occur.

Thus, project implementation would not expose people residing or working in the project area to excessive noise levels associated with aircraft and impacts would be less than significant.

6.11. PALEONTOLOGICAL RESOURCES - Would the project:

Issue 1:	Result in development that requires over 1,000 cubic yards of excavation in a high resources potential geologic deposit/formation/rock unit or over 2,000 cubic yards of excavation in a high resources potential geologic deposit/formation/rock unit?	☐	☐	☐	☒	☐

Impacts to paleontological resources occur when excavation activities encounter fossiliferous geological deposits and cause physical destruction of fossil remains. Fossil remains, fossil sites, fossil-producing geologic formations, and geologic formations with the potential for containing fossil remains are all considered paleontological resources or to have the potential to be paleontological resources. Fossil remains are considered important if they are well preserved, identifiable, type/topotypic specimens, age diagnostic, useful in environmental reconstruction, and/or represent new, rare, and/or endemic taxa.

A *Paleontological Resources Identification Report* was prepared by Michael Baker International (2022; refer to Appendix H) for the project to determine the potential for paleontological resources to occur on-site. A paleontology collection records search for locality and specimen data was conducted at the San Diego Museum of Natural History on September 2, 2019. The records search identified no previously identified fossil localities within the project site.

The project site is underlaid with the moderately sensitive Lindavista Formation at depths of 15.5 to 24.9 feet and the highly sensitive Scripps Formation at depths between 25 to 34 feet, as well as potentially underlaid by the highly sensitive Stadium Conglomerate at depths between 15.5 to 34 feet. Excavation for the project is planned at an approximate maximum depth of 71 feet to

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

accommodate the subterranean parking garage. As excavation would extend approximately 50 feet deeper than the existing on-site development, the project is considered to have the potential to impact undiscovered paleontological resources.

To ensure the protection of such resources, the project would be subject to requirements identified in the City of San Diego grading ordinance (Land Development Code Section 142.0151, Paleontological Resources Requirements for Grading Activities), which requires monitoring for paleontological resources during project grading activities, as specified above under discussion of the Complete Communities PEIR. If paleontological resources, as defined in the General Grading Guidelines for Paleontological Resources (Appendix P of the City's Land Development Manual), are discovered during project grading, all grading in the area of discovery shall be required to cease until a qualified paleontological monitor has observed the discovery and the discovery has been recovered in accordance with the General Grading Guidelines for Paleontological Resources (Land Development Code Section 142.0151(b)).

With conformance to the Land Development Code and General Grading Guidelines for Paleontological Resources, the project would not result in development that may affect unknown paleontological resources in a high resources potential geologic deposit/formation/rock unit. Impacts would be less than significant**.**

6.12. PUBLIC SERVICES AND FACILITIES - Would the project:

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

Emergency Services

The project site is currently served by the San Diego Fire-Rescue Department Station 35, located approximately 0.6 miles west of the site (4285 Eastgate Mall in University). It is anticipated that San Diego Fire-Rescue facilities and personnel would continue to be available and adequate to serve the project site, as occurs under existing conditions, once the proposed development is constructed. Due to the nature of the proposed use (Scientific Research), combined with the fact that the fire department currently provides service to similar on-site commercial office uses, the project is not anticipated to adversely affect existing levels of fire protection services to the area. All access to the site, as well as on-site circulation, has been designed in accordance with local City and fire department regulations to ensure that public safety is maintained. Further, the project applicant would be subject to the payment of development impact fees to offset potential effects on fire protection services. The project would not require the construction of new or expanded governmental facilities that could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives. Impacts to fire protection services would be less than significant.

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

The subject site is currently served by the San Diego Police Department (SDPD) Northern Division, located approximately 0.6 miles west (4275 Eastgate Mall in University). The Northern Division serves a population of 225,234 people and encompasses 41.3 square miles (City of San Diego n.d.). The SDPD maintains mutual aid agreements with other law enforcement agencies in San Diego County to expand available protection services when needed.

It is anticipated that adequate facilities and personnel would be available to respond to any incident at the project site. Additionally, the proposed land use type is not anticipated to substantially increase demand for police protection services in the area as compared to existing conditions. The project would not directly result in new population that may increase demand for police protection services. As such, the project would not result in the construction of new or expanded governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives. Impacts to police protection would be less than significant.

Schools

The project site is located within the service boundaries of the San Diego Unified School District. The project does not propose any residential uses that would generate additional population that may in turn increase demand for schools in the surrounding area. However, as the project would provide new employment opportunities, the proposed development may indirectly contribute to an increase in area population. To offset potential impacts on school systems, the project applicant would be subject to the payment of development fees in accordance with Section 65995 of the California Government Code, and as authorized under Section 17620 of the Education Code, which allow for the collection of fees that can be used for the expansion of existing school facilities or the construction of new school facilities as needed. Such fees are "deemed to be full and complete mitigation" (California Government Code Section 65995 et seq.). With payment of the required school facilities fees, the project would not result in the construction of new or expanded governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives. Impacts would be less than significant.

Libraries

The project does not propose residential uses that would directly generate new population to be served by local library facilities. It is not anticipated that future employees of the project would substantially increase demand for such services. Therefore, the project would not result in the construction of new or expanded governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives. Impacts would be less than significant.

Parks and Recreational Facilities

The project site is located within a highly urbanized portion of the City and surrounding lands are largely developed with commercial, light industrial, scientific/clinical research, medical, and general office uses. Existing parks in the vicinity include Weiss Mandell Eastgate Neighborhood Park,

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

approximately 0.6 miles southwest (City of San Diego 2022). Additionally, Torrey Pines State Reserve is located approximately 2.5 miles to the west.

The project does not propose residential uses that would directly generate new population to be served by local or regional parks or recreational facilities. It is not anticipated that future employees at the project site would substantially increase demand for such resources. The project would not result in the construction of new or expanded governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives. Impacts would be less than significant.

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

The project proposes Scientific Research & Development uses; no residential development would occur. Therefore, the project would not directly increase area population. Although the project would provide for new employment opportunities, it is not anticipated that such new employment in the area would substantially increase demands on existing neighborhood or regional recreational facilities such that substantial deterioration of existing facilities would occur or be accelerated. Impacts in this regard would be less than significant.

Issue 3:	Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒	☐

Refer to Issues 1 and 2, above. The project does not include residential development and would therefore not directly increase area population that would require new or expanded parks or recreational facilities. The provision of parks is not proposed with the project, and no adverse environmental effects would occur as the result of construction or expansion of such uses on-site or off-site. Although the project would provide new employment opportunities in the area, it is not anticipated that employees generated with project implementation would substantially increase the demand on existing neighborhood or regional recreational facilities such that an adverse physical effect on the environment would result. Therefore, impacts would be less than significant.

6.13. PUBLIC UTILITIES AND INFRASTRUCTURE - Would the project:

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

The 2020 City Urban Water Management Plan (UWMP) serves as the water resources planning document that assesses the current and future water supply and needs for the City. The Public Utilities Department local water supply is generated from recycled water, local surface supply, and groundwater, which accounts for approximately 20 percent of the total water requirements for the City. The City purchases water from the San Diego County Water Authority to make up the difference between total water demands and local supplies (City of San Diego 2021).

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

The project proposes a rezone to redesignate the property from RS-1-14 (Residential--Single-Family Unit) to EMX-2 (Employment Mixed-Use) as the existing RS-1-14 zone does not allow for the proposed Scientific Research Community Plan land use. Rezoning to EMX-2 would allow the project to be consistent with the City's Scientific Research land use designation and Prime Industrial identification by allowing for a variety of employment-focused uses. Further, the project would result in an increase in building square footage from approximately 134,800 sq. ft. (existing) to approximately 369,878 sq. ft. (proposed), and therefore, would intensify use of the site. However, the proposed use is not anticipated to generate a substantial increase in demand for water supplies over existing conditions, due to the nature of the use. The project would be constructed to meet all current local and state regulations pertaining to water conservation for both building use and landscaping. Further, as the project site is located in an urbanized and developed area, adequate water supply services are currently available to serve the site, and the project would not result in the introduction of a new land use in an area not currently served.

As previously stated, the project would transfer development intensity rights (3,744 average daily trips or "ADT") from University Community Plan Area Subarea 37 (City Ownership) to newly created Subarea 102 and Subarea 10 as follows: 1,933 ADT transferred to new Subarea 102 (project site), which will allow an additional 241,600 square feet of scientific research/R&D; and 1,811 ADT transferred to Subarea 10 (Alexandria, Campus Point), which will allow an additional 226,400 square feet of scientific research/R&D space. In doing so, the project would not adversely affect the applicable land use plan since the increase in development intensity is accommodated by the community plan amendment, planned development permit, and ADT transfer from Subarea 37. Additionally, the project is consistent with the Scientific Research use designation and Prime Industrial identification, and all other policies in the University Community Plan. Therefore, the proposed development would not adversely affect the applicable land use plan or increase water demand over that already anticipated to occur with future buildout of the area.

For the reasons above, the project would not result in the use of excessive amounts of water beyond projected available supplies. Impacts would be less than significant.

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

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

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

The City maintains ongoing franchise agreements with a number of haulers for solid waste disposal services. Solid waste from the project site is collected and taken to the Miramar Landfill (5180 Convoy Street, San Diego). The Miramar Landfill is expected to cease operation January 1, 2031, and is permitted to accept 8,000 tons per day (CalRecycle 2019).

As noted above, development in the City is subject to the provisions of the City's C&D Debris Diversion Deposit Ordinance, as amended in 2016, and the project would therefore be required to divert at least 75 percent of its construction waste generated by recycling, reusing, or donating usable materials. The project applicant must also provide a refundable C&D debris recycling deposit as part of the demolition permit process. The City established a threshold of 40,000 sq. ft. of development as generating sufficient waste (60 tons) to potentially result in a cumulatively significant impact on solid waste services. As the proposed project would exceed 40,000 sq. ft. of development and the 60-ton threshold, a Waste Management Plan (WMP) was prepared to identify measures to reduce the project's potential to contribute to a cumulative impact to below a level of significance for both construction and operational waste generation (Michael Baker 2022; see Appendix I), thereby reducing potential impacts on solid waste services in accordance with state and local regulations.

In accordance with the WMP, the project applicant would implement waste diversion measures to reduce impacts during all aspects of project demolition, clearing, grading, construction, and operations. Such measures would include, but not be limited to: 1) construction waste management coordination and oversight (via contractor agreements and City coordination; designation of a solid waste management coordinator [SWMC]; contractor waste management training; daily site inspections by contractors, and City verification); 2) construction waste reduction, diversion compliance, and verification (via identification, separation, and diversion of recyclable/reusable materials; source reduction measures); and 3) operational waste management and diversion measures (via a recycling program; exterior storage for refuse and recyclables; organic waste recycling). Mandatory compliance with these measures shall be included in all project contractor agreements, clearly reflected on project plans, and verifiable by City Environmental Services Department staff through written submittals and/or site inspections. Refer to the WMP (Appendix I) for additional details pertaining to each measure.

During site development, construction waste would be separated by material type and sent to the appropriate facility. As shown in the SWMP, the anticipated total waste diversion rate by phase is as follows: demolition (96 percent), grading (100 percent), and construction (96 percent). Based on such

calculations, total waste diversion rate for the entire site development phase of the project is anticipated to be 99 percent, which would surpass the 75 percent diversion rate requirement set by the City. The remaining amount of construction waste, mainly drywall, would be disposed of in an approved landfill (Michael Baker 2022; Appendix I).

With implementation of the diversion procedures outlined above, it is estimated that waste generated during site development would be diverted to appropriate facilities for reuse. All solid waste from the project site would be transported to an appropriate facility which would have adequate capacity to accept the waste generated by the project.

During the occupancy-operational phase, the project would result in a considerable contribution to a cumulative solid waste impact as the project would exceed the City's threshold of 60 tons per year for a development that is above 40,000 sq. ft. in size. However, implementation of the identified sustainability measures and a recycling program are proposed to reduce the project's potential contribution to a cumulative impact to a less than significant level.

As part of the waste diversion measures, an SWMC would be assigned to monitor and enforce on-site waste reduction and recycling efforts. The SWMC would be responsible for training the contractor(s), staff, and tenants on the proper waste management guidelines and procedures outlined in the WMP. The SWMC would ensure compliance with the San Diego Municipal Code, Recycling Ordinance, and Recyclable Materials Storage Regulations and would record the recycling and diversion rates for both project phases (site development and occupancy-operational) to ensure that all project goals and requirements are met. The SWMC would have the authority to issue stop work orders if proper procedures are not being followed. As the WMP is designed to adhere to all state and City ordinances and regulations with regard to waste management, the proposed project would not result in a significant impact with implementation of the SWMP.

Additionally, as the project anticipates that the mixed-use development would support restaurant and/or food service uses, such establishments would be required to conform to applicable regulations pertaining to recycling and disposal of organic waste. The project would be subject to requirements of AB 827, which requires that food establishments provide trash containers for products purchased and consumed on the premises as well as properly labeled containers for recyclables and organic waste (food waste). Effective as of July 1, 2020, this law applies to limited-service restaurants such as those restaurants where customers order and pay at the counter and bus their own tables after eating. Full-service food establishments that do not provide access to trash containers for products consumed on the premises are exempt. Similarly, the project would implement an organic waste recycling program to reduce methane emissions from short-lived climate pollutants, per the requirements of SB 1383, effective January 1, 2022. SB 1383 establishes targets to achieve a 50 percent reduction of the statewide disposal of organic waste from the 2014 level by 2020 and a 75 percent reduction by 2025. The project would also support landscaped areas that would be maintained periodically. Green waste generated by ongoing landscaping and landscape maintenance activities shall be source separated by the landscaping contractor and diverted to Miramar Greenery. Refer also to Appendix I for additional discussion.

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

The project would not result in impacts pertaining to solid waste management, including the need for construction of new solid waste infrastructure including organics management, materials recovery facilities, and/or landfills; or result in development that would not promote the achievement of a 75 percent target for waste diversion and recycling as required under AB 341 and the City's CAP. Impacts would be less than significant.

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

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

Complete Communities PEIR

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

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

Proposed Project

The project includes redevelopment of the site with approximately 369,878 square feet of scientific R&D with accessory uses across two buildings (310,416 SF of R&D use and 59,462 SF are planned as accessory/amenity space). The accessory/amenity space is expected to consist of a 7,655 SF market, 563 SF food and beverage space, 23,397 SF fitness center, and 27,847 SF of conference space(s). A rezone is proposed to change the zoning from RS-1-14 (Residential--Single-Family Unit) to EMX-2 (Employment Mixed-Use), which would be consistent with the land use designation of Scientific Research within the University Community Plan and the designations of "Industrial Employment" and Prime Industrial Lands from the City of San Diego General Plan. The project is anticipated to generate a net increase of 1,778 weekly average daily trips. This project trips would not conflict with an adopted program, plan, ordinance, or policy addressing the transportation system. Impacts would be less than significant and consistent with the findings in the Complete Communities PEIR.

Project Cumulative

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

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

Complete Communities PEIR

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

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

Proposed Project

The project's VMT Assessment Memo was prepared consistent with guidance from the City of San Diego Transportation Study Manual (TSM, September 2020), which is consistent with the State of California Office of Planning and Research's (OPR's) recommendations to evaluate potential transportation impacts using a VMT metric. The TSM provides guidelines for screening criteria, significance thresholds, analysis methodology, and mitigation measures.

As specified in the TSM, the requirement to prepare a detailed transportation VMT analysis applies to all land development projects, except for those projects that meet at least one of several screening criteria identified. Based on the project's proposed use, the TSM categorizes the project as a Commercial Employment land-use type. The VMT Assessment Memo evaluated whether the project would qualify under the TSM screening criteria for a Commercial Employment Project Located in a VMT Efficient Area. Therefore, the project was evaluated as a Commercial Employment land use using the SANDAG base year screening map (Series 14 ABM2, Year 2016). The regional mean VMT per employee is 27.2 miles. The project is located in Census Tract 83.39 for which the Employee VMT per employee is 32.1, or 118.0 percent of the regional mean. The project is not located within an area that is defined as VMT efficient, and therefore, the project does not meet the criteria to be screened out of further VMT analysis; refer to Table 6.14-1, Project VMT Generation, below.

TABLE 6.14-1. PROJECT VMT GENERATION

Regional Mean (VMT/Employee)	Significance Threshold (VMT/Employee)	Significance Threshold (% of Regional Mean)	Project VMT Generation (VMT/Employee)	Project VMT Generation (% of Regional Mean)	Significant Impact?
27.2	23.1	85%	32.1	118.0%	Yes

Source: Urban Systems Associates, Inc. 2022; see Appendix J.

Since the project did not satisfy the above screening criterion, it must evaluate the VMT produced by the project. The proposed commercial employment project is expected to generate approximately 2,959 daily unadjusted driveway trips and therefore, would typically be required to input the project into the SANDAG Regional Travel Demand Model to provide the Project's employee VMT per employee. However, since the project does not propose to quantify proposed mitigation measures, the project's VMT per employee is considered the same as the VMT per employee of the census tract in which it is located.

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

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

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

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

SDMC Section 143.1103(b)(1) requires the application of VMT reduction measures for all development located within a Mobility Zone 2 in accordance with the Land Development Manual Appendix T. Such VMT Reduction Measures are required to total a minimum of 5.0 points for Mobility Zone 2. These VMT Reduction Measures are listed under a series of categories including Pedestrian Measures, Bicycle Supportive Measures, Transit Supportive Measures, and Other Measures. Each individual measure is assigned a point value per unit of measure.

Implementation of mitigation measure MM-TRA-1 would reduce VMT impacts to the extent feasible and ensure project consistency with the Complete Communities: Mobility Choices ordinance. Table 6.14-2 presents the VMT Reduction Measures that would be implemented under MM-TRA-1 and their associated point values. As shown, the project would provide measures that add up to 10.5 points, which exceeds the minimum of 5.0 points required for development within Mobility Zone 2. Therefore, the project would be in compliance with the Mobility Choices Program regulations as mitigation to the extent feasible by relying upon the Findings and Statement of Overriding Considerations from the Complete Communities: Housing Solutions and Mobility Choices Final PEIR for its significant VMT impact.

TABLE 6.14-2 MOBILITY CHOICE MEASURES

Description of Mobility Choices Measure	Points Credited Towards Compliance
(S) Provide short-term bicycle parking spaces that are available, at least 10% beyond minimum requirements • Required short-term bicycle parking = 47 spaces • Provided short-term bicycle parking = 60 spaces (20% more than required)	3.0
(S) Provide long-term bicycle parking spaces that are available, at least 10% beyond minimum requirements • Required long-term bicycle parking = 47 spaces • Provided long-term bicycle parking = 61 spaces (20% more than required)	4.0
(S) Provide an on-site bicycle repair station	1.5
(S) Provide on-site multi-modal kiosks (above minimum kiosk requirement to serve a larger site)	2
Total Points for Mobility Choices Compliance	10.5

Source: Urban Systems Associates, Inc. 2022; see Appendix J.

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

Complete Communities PEIR

The Complete Communities PEIR found that although the project did not propose specific changes to roadways, future projects implemented in accordance with the Housing Program may include

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

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

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

Proposed Project

There would be no hazardous design features or incompatible uses introduced as a result of the project. Construction would take place within the existing site. The proposed scientific R&D and accessory uses would be consistent with the site's land use designation of Scientific Research within the University Community Plan and the designations of "Industrial Employment" and Prime Industrial Lands from the City of San Diego General Plan. The project proposes one 2-way right-in/right-out only driveway along Executive Drive and two 2-way right-in/right-out only driveways along Towne Centre Drive. All driveways would be constructed per City of San Diego Standard Drawings. However, the project proposes the northern driveway along Towne Centre Drive as 30 feet wide which requires a deviation from SDMC Section 142.0560(j)(1) for maximum permitted two-way nonresidential driveway width of 25 feet within a Parking Impact Area. The 30-foot width was demonstrated through turn radius templates as necessary to allow large trucks (WB-65) to enter the site without conflicting with the existing raised median. Parking is currently prohibited on Towne Centre Drive and therefore, the nonstandard driveway width would not eliminate on-street parking. Therefore, the project would not substantially increase hazards due to a geometric design features (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment), and impacts would be less than significant.

Project Cumulative

The project would not result in a cumulative increase in roadway hazards and therefore, the project would not result in cumulative impacts related to roadway hazards. Cumulative impacts would be less than significant and would be consistent with the findings in the Complete Communities PEIR.

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

Complete Communities PEIR

Aa stated in the Complete Communities PEIR, future development allowed under the proposed ordinances would be required to comply with all applicable City codes and policies related to emergency access, including the California Fire Code; the San Diego Municipal Code Chapter 5, Article 5, Division 87: Appendix D - Fire Apparatus Access Roads; and City Fire Policies A-14-1 Fire Access Roadways, A-14-9 Access Roadways: Modified Roadway Surface, and A-14-10 Fire Apparatus

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

Access Road for Existing Public Streets. Implementation of the Complete Communities Program does not specify any improvements that would interfere with or result in inadequate emergency access. Additionally, future development anticipated with implementation of the Complete Communities Program would be subject to review by the City Fire Marshal to ensure that adequate emergency access is maintained. As a result, impacts pertaining to emergency access would be less than significant.

Proposed Project

As indicated above, the project proposes access via two (2) 2-way right-in/right-out only driveways along Towne Centre Drive and one (1) 2-way driveway along Executive Drive. All proposed driveways would be constructed per City of San Diego Standard Drawings and the proposed driveway width deviation for the northern driveway along Towne Centre Drive would not affect emergency access. Therefore, the project would result in adequate emergency access. Impacts would be less than significant, consistent with the findings in the Complete Communities PEIR.

6.15. WILDFIRE - Would the project:

Issue 1: Expose people or structures, either directly or indirectly to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒	☐

According to the City of San Diego Fire-Rescue Department Official Very High Fire Hazard Severity Zone Map, the southern portion of the project site is located in an area designated as a Very High Fire Hazard Severity Zone (VHFHSZ) (City of San Diego 2022). Lands adjacent to the east and south are similarly identified as being in a VHFHSZ; lands immediately adjacent to the north and west are not identified as being subject to a high potential for fire hazard.

The proposed project is located in a highly developed area and would redevelop an existing commercial site, which is currently served by the City's fire department under existing conditions. Activities associated with the proposed project would not impede existing emergency response plans for the project area. Further, the project would not result in closures of local roadways that may have an effect on emergency response or evacuation plans in the vicinity of the project site, nor does the project take access off a major circulation roadway which may result in additional response delays. It is anticipated that all local roadways would remain open during project construction and operation. Further, demolition and construction activities occurring within the project site would comply with all conditions, including grading permit conditions regarding lay-down and fire access, and would not restrict access for emergency vehicles responding to incidents on the site or in the surrounding area. It is anticipated that all vehicles and construction equipment would be staged on-site, off of public roadways, and would not block emergency access routes.

Additionally, the design of project access and internal circulation, as well as the size and location of fire suppression facilities (e.g., hydrants and sprinklers), would be subject to applicable state and local standards and made conditions of approval of the project plans. The City Fire Department would also review the proposed development plans prior to project approval to ensure that adequate emergency access and on-site circulation are provided. The proposed project would also be subject to payment of public safety services impact fees to reduce potential effects of increased demand on fire protection services. The project would not require the installation or maintenance of

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

associated infrastructure that may exacerbate fire risk, as utility connections are already present on-site.

Although the project is partially located within an area designated as VHFHSZ, project conformance with applicable state and local requirements, in combination with existing fire protection facilities that are considered adequate to serve the proposed use, would reduce the potential for the project to result in the exposure of people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. Impacts in this regard would be less than significant.

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

Refer to Section 6.15, Issue 1, above. The project site is relatively flat and currently supports commercial development; no undeveloped lands, steep slopes, or areas susceptible to high speed wind patterns are present on-site or in the immediate vicinity. Further, the site is located within a highly urbanized portion of the City; surrounding lands are developed, thereby reducing the potential for the occurrence and/or spread of wildfire within the immediate community.

Although the project is partially located within an area designated as VHFHSZ, project conformance with applicable state and local requirements, in combination with existing conditions on-site and in the surrounding vicinity, would reduce the potential for the project to exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Impacts in this regard would be less than significant.

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

Refer to Section 6.15, Issue 1 and 2, above. The proposed project is located in a highly developed area and would redevelop an existing commercial site. The project would not require the installation or maintenance of associated infrastructure that may exacerbate fire risk as utility connections are already present and serve the existing on-site development. The project is therefore not anticipated to require the installation or maintenance of associated infrastructure that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment. Impacts would be less than significant.

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

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

Refer to Section 6.15, Issues 1 and 2, above. As the project site and surrounding lands are relatively flat, the potential risk of downslope flooding or landslide hazards is considered low (see also Section 6.5, Geology and Soils). Further, as the project has been designed in accordance with City standards for grading and drainage control, the project would not increase the quantity or rate of runoff from the subject site with project implementation, thereby minimizing the potential for the project to contribute to significant risk including downstream flooding as a result of runoff or drainage changes. Therefore, impacts would be less than significant.

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

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

The California Department of Transportation (Caltrans) is responsible for denoting Officially Designated State Scenic Highways and Historic Parkways. I-5 is located approximately 2 miles west of the project site. Caltrans has designated I-5 as an eligible state scenic highway within the vicinity of the University community; however, it is not identified as an official state scenic highway.

As noted in the University Community Plan, scenic resources within the project area include the Pacific Ocean, Torrey Pines State Reserve, and Torrey Pines City Park and golf course. Views of the beach, sheer cliffs, native vegetation and scenic views of the Pacific Ocean are considered to be distinctive features of the University Community Plan area. Regional aesthetic resources also include Rose Canyon and San Clemente Canyon.

The project site is not located in an area designated as a scenic vista or viewshed by either the City of San Diego General Plan or the University Community Plan. The area surrounding the project site is highly urbanized and developed with a variety of land uses such as light industrial, scientific/clinical research, medical, and general office uses. Commercial uses are located immediately adjacent to the west and south. The University of California at San Diego campus is located farther to the west. Additionally, residential uses are located approximately 0.2 miles to the southwest. The Westfield University Town Center shopping center is located approximately 0.3 miles to the southwest. Additionally, the trolley line operated by the MTS runs generally north–south in the vicinity of the site along Genesee Avenue, approximately 0.4 miles to the west.

The project proposes to demolish the existing on-site buildings that total approximately 138,400 square feet and construct two four-story structures that would support approximately 310,416 square feet of R&D uses with 59,442 square feet of accessory/amenity uses. Maximum height of the proposed buildings would be 72 feet.

Due to the surrounding setting and existing on-site development, the project would not substantially change existing public views. The proposed development would not obstruct any public views of the Pacific Ocean or Torrey Pines State Reserve, as both features are located approximately 2.5 miles to the west. Furthermore, existing development such as commercial uses, the University of San Diego, and other infrastructure (such as I-5), combined with intervening topography and mature vegetation (e.g., landscaping), currently obstruct potential views to any such scenic resources.

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

The project would not result in a substantial obstruction of a vista or scenic view from a public viewing area. No impact to a scenic vista would occur with project implementation.

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

The project site is located in a highly urbanized and developed area, surrounded by a variety of light industrial, scientific/clinical research, medical, and general office uses, as well as established infrastructure such as roadways, the trolley line, and other such urban elements.

The site currently supports several office buildings that are connected below grade by one level of subterranean parking; additional surface parking is also provided. The project would demolish the existing on-site buildings and construct two four-story structures that would support scientific research and supporting amenities. On-site development currently totals approximately 134,800 square feet.; uses proposed with the project would total approximately 369,878 square feet. As such, the project would result in a similar land use type on-site.

The project would be required to demonstrate conformance with the University Community Plan which provides design guidelines regulating the visual character of new development within the plan boundaries. Specifically, the University Community Plan Urban Design Element provides a vision for the community's future and identifies policies and goals, as well as specific design criteria intended to guide the form of future growth in the community and provide the basis for City review of proposed development.

Additionally, the Development Intensity Element of the Community Plan is intended to regulate the intensity of development, based on the finite traffic capacity of the projected circulation system, and allocates specific building square footage or dwelling units per net acre to ensure continued compatibility with the intended visual character of the area. As stated previously, the project would transfer development intensity rights (3,744 ADT) from University Community Plan Area Subarea 37 (City Ownership) to newly created Subarea 102 and Subarea 10 as follows: 1,933 ADT transferred to new Subarea 102 (project site), which would allow an additional 241,600 square feet of scientific research/R&D; and 1,811 ADT transferred to Subarea 10 (Alexandria, Campus Point), which would allow an additional 226,400 square feet of scientific research/R&D space.

Although the project would result in an increase in total square footage and building height as compared to existing conditions, the project design would remain in conformance with that allowed by applicable zoning and design guidelines. The project would be consistent with design requirements identified in the Municipal Code for the proposed EMX-2 (Employment Mixed-Use) zone (e.g., building height, lot coverage, floor area ratio). Further, development of the project site as proposed would not adversely alter existing views to the site from off-site public vantage points. Although the project would result in a visual change in existing public views of the site, the development is considered to be consistent with the underlying zoning and applicable design guidelines.

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

For the reasons above, the project would not result in a substantial adverse alteration to the existing or planned character of the area. Impacts would be less than significant.

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

The project site is located in a highly urbanized area supporting a variety of commercial and light industrial uses. A number of mature trees planted as ornamental landscaping on-site would be removed to allow for development of the subject property as proposed; refer to Figure 4, Conceptual Landscape Plan. However, such trees are not considered to be distinctive in character or landmark trees, and do not substantially contribute to the scenic value of the site or its surroundings. Therefore, impacts in this regard would be less than significant.

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

The project site is generally flat and does not support any hillsides, landforms, or other topographic features. On-site grading and excavation would be required to accommodate the proposed buildings and subterranean parking garage. However, topography of the site would not be substantially altered with the proposed development as compared to that under current, developed conditions. The project would not result in a substantial change in the existing landform. Impacts would be less than significant.

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

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

6.17 AGRICULTURE AND FORESTRY RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled

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

by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

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

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

According to the DOC's California Important Farmland Finder (DOC 2018), the project site is classified as Urban and Built-Up Land, which is land that is occupied by structures with a building density of at least one unit to 1.5 acres, or approximately six structures to a 10-acre parcel. The project site is located in a highly developed area supporting a variety of land uses including light industrial, scientific/clinical research, medical, and general office uses. Agricultural land is not present on the site or in the general vicinity. As a result, the project would not result in the conversion of such lands to non-agricultural use. No impact would occur in this regard.

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

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

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

As stated in item II(a) above, the project site is located in an area classified by the DOC as Urban and Built-Up Land where neither farmland nor agricultural resources are present. Per the City's General Plan, the project site is given Scientific Research and Prime Industrial land use designations. Additionally, the project site is not encumbered by a Williamson Act Contract and would not affect any properties zoned for agricultural use or affected by a Williamson Act Contract, as there are none within the project vicinity. No impact would occur in this regard.

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

Public Resources Code Section 12220(g) defines "forest land" as land that can support 10 percent native cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits. Based on this definition, no forest land occurs within or adjacent to the project site. Moreover, there is no land zoned as forest land or timberland that exists within the project site or its vicinity. Scattered ornamental trees and vegetation exists throughout the project site; however, there is no concentration of trees within the site boundaries that would constitute a forest. Moreover, as discussed under Section 6.3, Issue 1, above, the project has been designed to avoid direct impacts to naturally occurring Torrey pine trees and no removal of naturally-occurring Torrey pine trees are expected. The project would not conflict with existing zoning for or cause a rezoning of forest land, timberland, or timberland zoned Timberland Production. No impact would occur.

Issue 4:	Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒

As stated in Issue 3 above, there is no forest land present on the site or vicinity. The site has not been historically used, and is not currently used or planned to be used, for forest land. As such, implementation of the proposed project would not result in the loss of forest land or conversion of forest land to non-forest use. No impact would occur.

6.18 MINERAL RESOURCES

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

The DOC classifies the project site as within Mineral Resource Zone 1 (MRZ-3), areas containing known or inferred mineral occurrences of undetermined mineral resource significance (DOC 2017). No known mineral resource recovery sites occur or are designated within or adjacent to the project site, including in the Conservation Element of the City's General Plan. The project site is not currently

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

being utilized for mineral extraction and the site is zoned and planned for Research and Development purposes with supporting amenities. The project would not result in the loss of availability of a known mineral resource. No impact would occur.

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

See response to Section 6.18, Issue 1. No impact would occur.

6.19 POPULATION AND HOUSING

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

The project does not include housing that would directly induce population growth. The project would provide employment opportunities through the development of 310,416 SF of research and development land uses and associated amenities and infrastructure. As discussed, the future tenants are unknown, so it is too speculative to provide an estimate on the number of new employment opportunities that would be introduced and if those opportunities would be at a magnitude to induce the relocation of employees to the area. It is possible that some of the project's future tenants would have a percentage of employees relocate to the area, but such numbers would not be substantial so as to adversely affect existing and future housing stock in the community. According to estimates by the San Diego Association of Governments, the La Jolla area had a 9.6 percent housing vacancy rate in 2021 and is projected to have a vacancy rate of 11.2 percent in 2035 and continue to remain fairly stable near that rate for the planning horizon year of 2050 at 11.9 percent. Thus, any incremental population growth as a result of project-related employment opportunities could be accommodated by the current and future housing stock. Impacts would be less than significant in this regard.

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

The project site is currently developed with three buildings that are used in support of scientific research and development as well as subterranean and surface parking, all of which would be demolished to accommodate the proposed project. Thus, the proposed project would not displace existing housing, necessitating the construction of replacement housing elsewhere. Although the project site is currently zoned RS-1-14 (Single Family Residential), the site would be rezoned to EMX-2 (Employment Focused Mixed-Use) with project implementation. As such, the project would be consistent with the existing Scientific Research and Prime Industrial land use designations for the site, as indicated in the City's University Community Plan and General Plan. Project implementation

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

would not remove land assigned for residential purposes thereby indirectly resulting in the need for housing elsewhere. No impact would occur.

20. MANDATORY FINDINGS OF SIGNIFICANCE - The lead agency shall find that a project may have a significant effect on the environment and thereby require an EIR to be prepared for the project where there is substantial evidence, in light of the whole record, that any of the following conditions may occur. Where prior to commencement of the environmental analysis a project proponent agrees to mitigation measures or project modifications that would avoid any significant effect on the environment or would mitigate the significant environmental effect, a lead agency need not prepare an EIR solely because without mitigation the environmental effects would have been significant (per Section 15065 of the State CEQA Guidelines):

a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☒	☐	☐

As documented in this Initial Study, the project may have the potential to degrade the quality of the environment, notably with respect to noise and transportation. The project does not have the potential to result in any other impacts that would substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory. As such, mitigation measures have been incorporated to reduce impacts to less than significant as outlined within the Initial Study.

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

As described herein, all impacts identified would be reduced to less than significant with the incorporation of mitigation measures, as applicable. At a program level, the PEIR found that potentially significant VMT impacts could nonetheless remain significant because it could not be determined with certainty whether the improvements would be implemented at the time a future development project's VMT impacts could occur and whether those impacts would be mitigated to a less than significant level. As the analysis for this issue was cumulative in nature, accordingly, cumulative impacts related to VMT would also be significant. Adequate mitigation is proposed to reduce VMT-related impacts for the proposed project to the extent feasible and ensure project consistency with the Complete Communities: Mobility Choices ordinance. The project would provide

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

measures that exceed the minimum of 5.0 points required for development within Mobility Zone 2. Therefore, the project would be in compliance with the Mobility Choices Program regulations as mitigation to the extent feasible by relying upon the Findings and Statement of Overriding Considerations from the Complete Communities: Housing Solutions and Mobility Choices Final PEIR for its significant VMT impact. VMT related impacts would be minimized to the extent feasible, but would remain a cumulatively significant impact that was adequately addressed as part of the Complete Communities PEIR.

Air quality is a regional issue and the cumulative study area for air quality impacts encompasses the San Diego Air Basin as a whole. Therefore, the cumulative analysis considers regional air quality plans and policies, such as the RAQS, as well as the project's contribution to a net increase of any criteria pollutant for which the basin is listed as a non-attainment area. As described in Section 6.2, Air Quality. Issue 1 above, the project would be consistent with the Industrial Employment and Prime Industrial General Plan designations, the Scientific Research designation in the University Community Plan. Therefore, the project would be consistent with the growth assumptions of the General Plan used to develop the RAQS emissions budgets. Additionally, as discussed under Section 6.2, Air Quality, Issue 2 above, the project would not result in construction or operational emissions in excess of the applicable screening level thresholds for all criteria pollutants. Consequently, the project would not result in an increase in emissions that are not already accounted for in the RAQS emissions budgets. As described in Section 6.3, Biological Resources, Issue 1 above, the project would be required to comply with federal, state, and City regulations, including avoidance of impacts to nesting bird species, through implementation of measures that would be spelled out as conditions of approval for the project that would reduce impacts on nesting migratory birds and raptors to a level less than significant. As described in Section 6.6, Greenhouse Gas Emissions, Issue 2 above, the project would be consistent with the City's CAP Consistency Checklist, thereby ensuring that the project's contribution of GHGs to cumulative statewide emissions would be less than cumulatively considerable. All other project impacts were determined to be less than significant, and due to the limited scope of the project, would result in less than cumulatively considerable impacts.

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

As discussed throughout this document, it is not anticipated that the demolition, construction, and/or operation of the project would cause environmental effects that would significantly directly or indirectly impact human beings; all such potential impacts identified as being significant have been mitigated to below a level of significance. For this reason, all environmental effects would fall below the thresholds of significance adopted by the City of San Diego. Impacts would be less than significant with mitigation incorporated.

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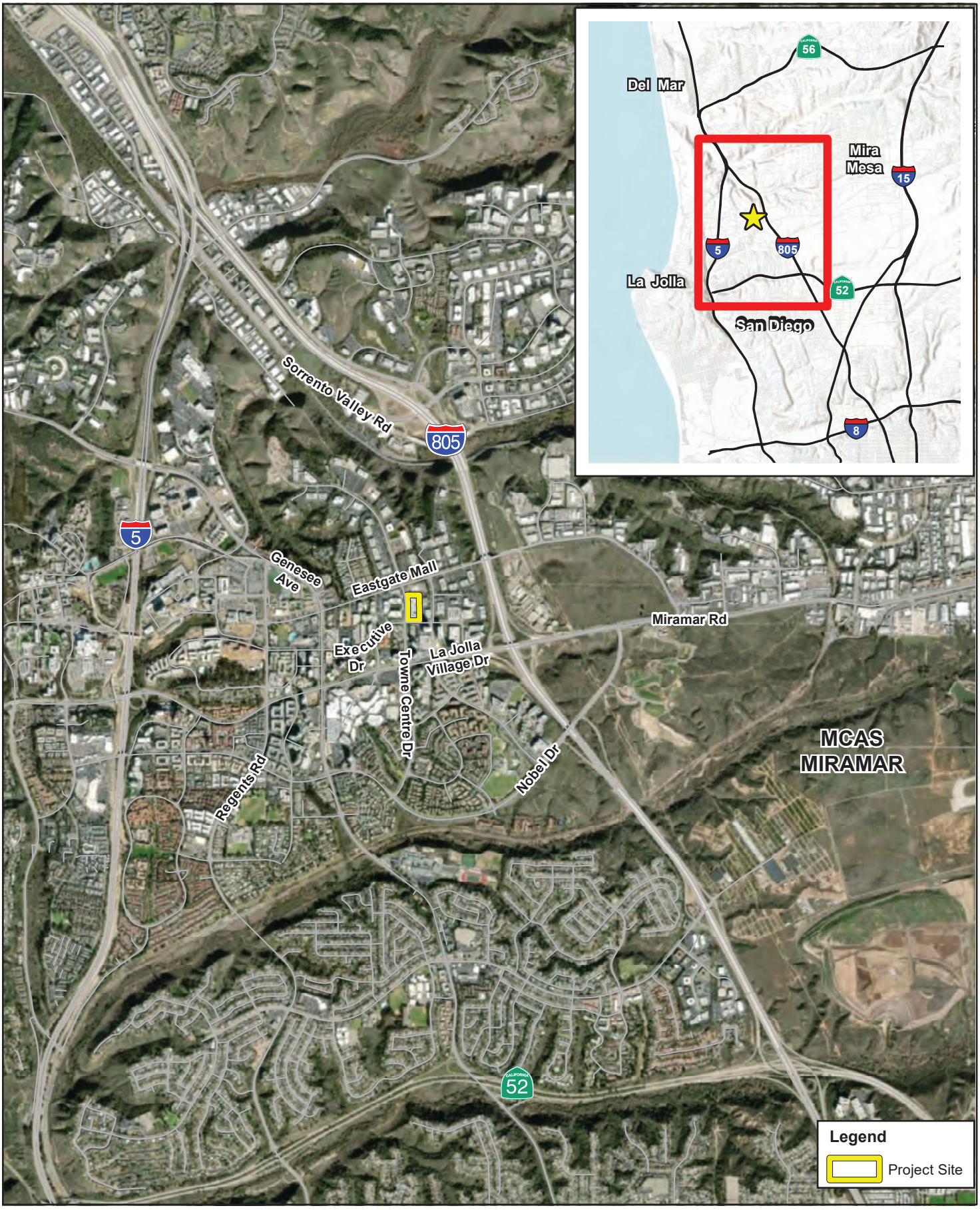
No references were specifically sourced.

8 LIST OF ABBREVIATED TERMS

AAQS	Ambient Air Quality Strategies
AB	Assembly Bill
ADT	Average Daily Trip
afy	acre feet per year
AIA	Airport Influence Area
AICUZ	Air Installations Compatible Use Zones
ALUC	Airport Land Use Commission
ALUCP	Airport Land Use Compatibility Plan
APN	Assessor's Parcel Number
ARE	Alexandria Real Estate
BMP	Best Management Practice
C&D	Construction and Demolition
c.y.	cubic yard
Cal/OSHA	California Division of Occupational Safety and Health
CalEEMod	California Emissions Estimator Model
CALGreen	California Green Building Code
California Register	California Register of Historical Resources
CalRecycle	California Department of Resources Recycling and Recovery
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CARB	California Air Resources Board
CCR	California Code of Regulations
CEQA	California Environmental Quality Act
CHRIS	California Historical Resources Information System
CIP	capital improvements program
CNEL	Community Noise Equivalent Level
CO	carbon monoxide
CP	Community Plan
CPU	Community Plan Update
dBA	A-weighted decibel
DPM	Diesel Particulate Matter
EIR	Environmental Impact Report
EMX-2	Employment Mixed-Use
ESL	Environmentally Sensitive Lands
EVCS	Electric vehicle charging station
EVSE	Electric vehicle supply equipment
FAA	Federal Aviation Administration
FHWA	Federal Highway Administration
FTA	Federal Transit Administration
GHG	Greenhouse Gas
GP	General Plan
Housing Program	Complete Communities: Housing Solutions
HVAC	heating, ventilation, and air conditioning
I-5	Interstate 5
I-805	Interstate 805
LDM	Land Development Manual

LEED	Leadership in Energy and Environmental Design
L_{eq}	Equivalent Sound Level
LID	Low Impact Development
L_{max}	Maximum Sound Level
L_{min}	Minimum Sound Level
MCAS	Marine Corps Air Station
MHPA	Multi-Habitat Planning Area
MMRP	Mitigation, Monitoring, and Reporting Program
MMT CO_2E	million metric tons of carbon dioxide equivalent
MND	Mitigated Negative Declaration
Mobility Choices Program	Complete Communities: Mobility Choices
MSCP	Multiple Species Conservation Program
MTS	Metropolitan Transit Service
MWD	Metropolitan Water District
NAAQS	National Ambient Air Quality Strategies
National Register	National Register of Historic Places
NCWRP	North City Water Reclamation Plant
NO_X	nitrous oxides
NPDES	National Pollutant Discharge Elimination System
O_3	photochemical smog (ozone)
PDP	Priority Development Project
PEIR	Program Environmental Impact Report
PM_{10}	coarse particulate matter
$PM_{2.5}$	fine particulate matter
PPV	peak particle velocity
PRC	Public Resources Code
R&D	research and development
RAQS	Regional Air Quality Strategies
ROG	reactive organic gases
RS-1-14	Residential--Single-Family Unit
RWQCB	San Diego Regional Water Quality Control Board
SANDAG	San Diego Association of Governments
SB	Senate Bill
SCAQMD	South Coast Air Quality Management District
SDAPCD	San Diego Air Pollution Control District
SDCWA	San Diego County Water Authority
SDG&E	San Diego Gas & Electric
SDMC	San Diego Municipal Code
SDPD	San Diego Police Department
SIP	State Implementation Plan
SJVAPCD	San Joaquin Valley Air Pollution Control District
SO_2	sulfur dioxides
sq. ft.	square feet
SR	Scientific Research
SR 52	State Route 52
SWMC	Solid Waste Management Coordinator

SWPPP	Stormwater Pollution Prevention Plan
TAC	Toxic Air Contaminant
TDM	Transportation Demand Management
TPA	Transit Priority Area
U.S.	United States
UCSD	University of California, San Diego
UWMP	Urban Water Management Plan
VHFHSZ	Very High Fire Hazard Severity Zones
VMT	Vehicle Miles Traveled
VOC	volatile organic compounds
VPHCP	Vernal Pool Habitat Conservation Plan
WMP	Waste Management Plan
WQMP	Water Quality Management Plan
WSA	Water Supply Assessment



0 0.25 0.5 1 Miles

Source: ESRI World Imagery, US Census Tiger/Line, National Highway Planning Network

ARE SCIENCE VILLAGE

Regional Vicinity

Figure 1



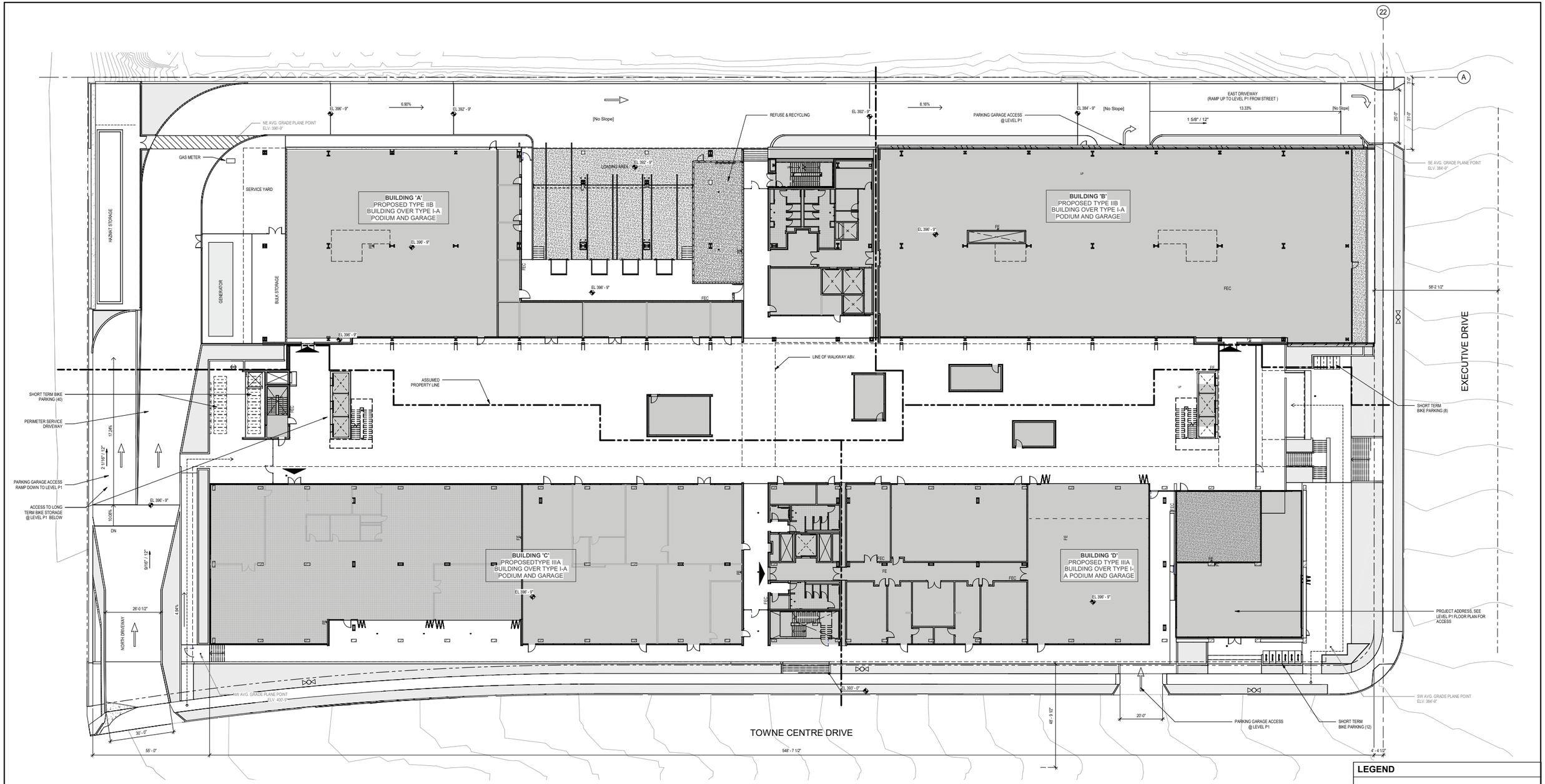
0 100 200 400 Feet

Source: ESRI World Imagery

Science Village

Location Map

Figure 2



GENERAL SITE PLAN NOTES

1. SEE LANDSCAPE SHEET L110 FOR LANDSCAPE AND HARDSCAPE PLAN.
2. SEE CIVIL SHEET C200 FOR CIVIL/ GRADING PLAN.
3. ALL MECHANICAL EQUIPMENT, TRASH STORAGE. SERVICE AREAS AND UTILITY APPURTENANCES, SHALL BE SCREENED FROM PUBLIC VIEW. SCREENING MAY INCLUDE WALLS AND LANDSCAPING.
4. PROVIDE BUILDING ADDRESS NUMBERS, VISIBLE AND LEGIBLE FROM THE STREET OR ROAD FRONTING THE PROPERTY PER FHPS POLICY P-20-6 (UFC 901.4.4)
5. NO EXISTING OR PROPOSED EASEMENTS ON SITE
6. NO OBSTRUCTION INCLUDING LANDSCAPING OR SOLID WALLS IN THE VISIBILITY AREA SHALL EXCEED 36" IN HEIGHT.

LEGEND

- PROPERTY LINE
- ASSUMED PROPERTY LINE
- LIMIT-OF-WORK LINE
- ACCESSIBLE PATH OF TRAVEL
- FIRE HYDRANT SEE C200 FOR MORE INFO.
- BUILDING MAIN ENTRY

Not to Scale

Sources: The Miller Hull Partnership, LLP and Alexandria, 05/24/2022

ARE SCIENCE VILLAGE

Site Plan

Figure 3