



**Draft Initial Study/Environmental  
Checklist and Mitigated Negative  
Declaration for the La Atalaya Project  
Del Mar, California**

*Prepared for*  
City of Del Mar  
1050 Camino del Mar  
Del Mar, CA 92014-2604

*Prepared by*  
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RECON Number 9378  
October 27, 2020

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**ATTACHMENTS**

- 1: Air Quality Report, RECON Environmental, Inc. dated July 6, 2020.
- 2: Biological Resources Report, Klutz Biological Consulting dated September 21, 2020
- 3: Historical Resources Survey, RECON Environmental Inc. dated March 30, 2020
- 4: Historic Evaluation Report, Heritage Architecture & Planning on May 12, 2020
- 5: Preliminary Geotechnical and Infiltration Testing Report, Geotechnical Exploration, Inc. dated June 18, 2018.
- 6: Greenhouse Gas Analysis, RECON Environmental, Inc. dated July 6, 2020
- 7: Storm Water Management Plan (SWMP), by Sowards & Brown Engineering, Inc. dated September 3, 2019
- 8: Vehicle Miles Traveled (VMT) Analysis Technical Memorandum, Chen Ryan dated June 2, 2020
- 9: AB 52 Tribal Notification and Consultation Request

## 1.0 Introduction

This Initial Study/Mitigated Negative Declaration (IS/MND) has been prepared in accordance with relevant provisions of the California Environmental Quality Act (CEQA) of 1970, as amended, and the CEQA Guidelines, as revised. This IS/MND evaluates the environmental effects of the La Atalaya Project (project), which involves the subdivision of the project site into eight new lots.

The IS/MND includes the following components:

- A Draft IS/MND and findings made by the City of Del Mar (City) that the project would result in potentially significant environmental impacts unless mitigation is incorporated, as identified in the CEQA IS Checklist.
- A detailed project description.
- The CEQA IS Checklist, which provides standards to evaluate the potential for significant environmental impacts from the project, and is adapted from Appendix G of the CEQA Guidelines. The project is evaluated in 20 environmental issue categories to determine whether the project's environmental impacts would be significant in any category. Brief discussions are provided that further substantiate the project's anticipated environmental impacts in each category.

Because the project fits into the definition of a “project” under Public Resources Code Section 21065 requiring discretionary approvals by the City, and because it could result in a significant effect on the environment, the project is subject to CEQA review. The IS Checklist was prepared to determine the appropriate environmental document to satisfy CEQA requirements: an Environmental Impact Report (EIR), a Mitigated Negative Declaration (MND), or a Negative Declaration (ND). The analysis in this IS Checklist supports the conclusion that the project would result in potentially significant environmental impacts unless mitigation is incorporated; therefore, a MND has been prepared.

This IS/MND will be circulated for 30 days for public and agency review, during which time individuals and agencies may submit comments on the adequacy of the environmental review. Following the public review period, the City will consider any comments received on the IS/MND when deciding whether to adopt the MND.



## 2.0 Draft Mitigated Negative Declaration

**Project Name:** La Atalaya Project

**Project Location:** The project is located in the city of Del Mar, San Diego County, California. The project is generally located between Zapo and Gatun streets, and Serpentine and San Dieguito Drive (assessor parcel numbers 299-200-62, 299-200-63, 299-200-64, 299-200-65, 299-192-24, 299-161-14, 299-161-42, and 299-161-43). The project is located within Section 14 of Township 14 South, Range 4 West on the United States Geological Survey (USGS) Del Mar OE W, California topographic quadrangle.

Figure 1 provides the regional location of the project site and Figure 2 shows the project location and surrounding land uses on an aerial photograph.

**Project Description:** The project is an approximately 18-acre property that is currently configured in eight separate lots (Figure 3). As identified in Figure 3, vacant lots 1 and 2 are accessible off San Dieguito Drive, lot 3 is an existing developed lot accessed off Gatun Street, lot 4 is an existing developed lot accessed off Serpentine Drive, lot G is an existing vacant lot accessed off Serpentine Drive, lot “Block 30” is a small teardrop-shaped lot located in the middle of the Serpentine turnaround, and vacant lots O and U are accessible off Zapo Street.

The project proposes to reconfigure the eight existing lots into eight new lots identified as Proposed lots 1, 2, 3, 4, 5, 6, 7, and 8 (Figure 4) through a series of lot line adjustments. The eight new lots are proposed to be subdivided as follows:

1. Existing lots 1 and 2 along San Dieguito Drive would be split into four lots and are labeled on Figure 4 as lots 5-8.
2. Existing and proposed lot 3 is an existing developed lot with minor modifications proposed to the lot lines.
3. Existing lots G and “Block 30” would become a part of proposed lot 4.
4. Existing lot O would be labeled as lot 1 with minor modifications to lot lines.
5. Existing lot U would be labeled as lot 2 with minor modifications to lot lines.

Proposed lots 1, 2, 5, 6, 7, and 8 are vacant. The existing lot “Block 30” is a small undevelopable teardrop-shaped lot located in the turnaround of the terminus of Serpentine Drive and contains 11 Torrey pine trees. Existing lots G and O are not in conformance with some of the existing City and California Coastal Commission (CCC) land use regulations with respect to Street Frontage and/or the ability to develop the property with minimum encroachment into steep slopes. As shown in Figure 4, there are a variety of unused easements, encroachments, and property encumbrances that are outdated. These easements would either be quitclaimed or vacated with the proposed project.

The proposed project is a subdivision map that would make currently non-complying lots comply more with the applicable City Zoning Ordinance (Del Mar Municipal Code [DMMC] Title 30) and certified Local Coastal Program (LCP) requirements by adjusting lot lines between existing lots to better accommodate the constraints of the environmental and land use regulations. The proposed project is limited to the subdivision map and development of utility lines, road modifications, and storage shed relocation. No further development has

been requested by the project applicant on any of the proposed lots. The proposed lot line adjustments are in compliance with subdivision requirements of the DMMC, with exception to proposed lot 1 which is proposed to maintain an existing non-conforming minimum street frontage. The proposed subdivision includes encroachments into required steep slope setbacks and proposed reductions in the required buffer from lagoon wetlands required by DMMC Chapters 30.52 (Bluff, Slope and Canyon) and 30.53 (Lagoon Overlay Zone).

Proposed development would be limited to site improvements for utility lines, widening and lengthening of the existing private road (to be named La Atalaya Way) with related improvements (e.g., retaining wall, turnaround, modification to existing “Snake Wall” for vehicle sight-line), and relocation of an existing storage shed. While further development of lots 1, 2, 5, 6, 7, and 8 are not proposed at this time, this IS/MND evaluates potentially significant impacts that could occur from full buildout of homes within the undeveloped lots. Notwithstanding, the analysis herein, in the event future development is proposed on these lots, the scope of development would be further evaluated by the City for potential impacts and compliance with applicable regulations and mitigation measures discussed in this IS/MND.

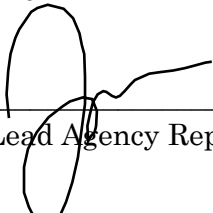
**Findings:** Pursuant to the provisions of CEQA (Public Resources Code, Section 21000 et seq.) and based on information contained in the attached IS Checklist, the City of Del Mar has determined that the project would not result in significant adverse impacts in the following areas: Aesthetics, Agriculture and Forestry Resources, Air Quality, Energy, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Population and Housing, Public Services, Recreation, Transportation, Utilities and Services, and Wildfire.

Impacts that were shown to have a less-than-significant impact with mitigation were in regards to Biological Resources as a result of future development, Cultural Resources as a result of ground-disturbing activities, Geology and Soils as a result of future development, and Tribal Cultural Resources as a result of ground-disturbing activities. Measures to avoid or mitigate the effects would be incorporated into the project to reduce the impacts to below a level of significance.

Due to the COVID-19 pandemic, the Del Mar City Hall and Del Mar Branch Library, locations commonly used for placement of hard copy documents, are closed to the public until further notice. However, the Draft IS/MND is available to the general public for review on the City’s website at: [www.delmar.ca.us/Archive.aspx?AMID=57](http://www.delmar.ca.us/Archive.aspx?AMID=57).

Upon the re-opening of the Del Mar City Hall and/or Del Mar Branch Library to the public during the 30-day circulation period for public comment, a hard copy of the Draft IS/MND will be made immediately available at the following locations:

Del Mar Library	Del Mar Civic Center
1309 Camino del Mar	1050 Camino del Mar
Del Mar, CA 92014	Del Mar, CA 92014

 _____ Signature of Lead Agency Representative	10/27/2020 _____ Date
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## 3.0 Project Description

### 1. Project:

La Atalaya Project

### 2. Lead Agency:

City of Del Mar  
1050 Camino del Mar  
Del Mar, CA 92014-2698

### 3. Contact Person and Phone Number:

Ms. Jennifer Gavin  
Associate Planner  
City of Del Mar Planning Department  
(858) 755-9313  
jgavin@delmar.ca.us

### 4. Project Location:

The project is located in the city of Del Mar, San Diego County, California, east of Zapo Street and north of Serpentine Drive. The property includes eight existing parcels (assessor parcel numbers (APNs) 299-200-62, 299-200-63, 299-200-64, 299-200-65, 299-261-42, 299-261-43, 299-192-24, 299-261-14). The location is further described as being within Section 14 of Township 14 South, Range 4 West on the USGS Del Mar OE W, California topographic quadrangle.

Figure 1 provides the regional location of the project site, and Figure 2 shows the project location and surrounding land uses on an aerial photograph.

### 5. Project Applicant/Sponsor:

Mr. Ron Neeley  
La Atalaya LLC  
PO Box 1129  
Del Mar, CA 92014

### 6. City of Del Mar Community Plan (General Plan) Designation:

The project site is located within the North Hills District and designated as Very Low Density Residential.

## **7. Zoning:**

The project site is designated in the Zoning Ordinance (DMMC Title 30) as Very Low Density Residential (R1-40). Additionally, the project site is located within the following overlay zones: Bluff, Slope, and Canyon (DMMC Chapter 30.52); Lagoon (DMMC Chapter 30.53); and Open Space (DMMC Chapter 30.60).

## **8. Description of Project:**

### **Existing Condition**

The project is an approximately 18-acre property that is currently configured in eight separate lots (see Figure 3). Existing lots 3 and 4 have been previously developed with a primary residence at 690 Serpentine Drive and a guest house at 2100 Gatun Street, respectively. The six remaining existing lots are vacant.

As identified in Figure 3, vacant lots 1 and 2 are accessible off San Dieguito Drive, lot 3 is an existing developed lot accessed off Gatun Street, lot 4 is an existing developed lot accessed off Serpentine Drive, lot G is an existing vacant lot accessed off Serpentine Drive, lot “Block 30” is a small teardrop-shaped lot located in the middle of the Serpentine turnaround, and vacant lots O and U are accessible off Zapo Street. Existing lots G and O are not in conformance with some of the existing City and CCC land use regulations with respect to Street Frontage and/or the ability to develop the property with minimum encroachment into steep slopes.

### **Proposed Project**

The project proposes to reconfigure the eight existing lots into eight new lots identified as proposed lots 1, 2, 3, 4, 5, 6, 7, and 8 (Figure 4) through a series of lot line adjustments. The eight new lots are proposed to be subdivided as follows:

1. Existing lots 1 and 2 along San Dieguito Drive would be split into four lots and are labeled on Figure 4 as lots 5-8.
2. Existing and proposed lot 3 is an existing developed lot with minor modifications proposed to the lot lines.
3. Existing lots G and “Block 30” would become a part of proposed lot 4.
4. Existing lot O would be labeled as lot 1 with minor modifications to lot lines.
5. Existing lot U would be labeled as lot 2 with minor modifications to lot lines.

Proposed lots 1, 2, 5, 6, 7, and 8 are vacant. The existing lot “Block 30” is a small undevelopable teardrop shaped lot located in the turnaround of the terminus of Serpentine Drive and contains 11 Torrey pine trees. Existing lots G and O are not in conformance with some of the existing City and CCC land use regulations with respect to Street Frontage and/or the ability to develop the property with minimum encroachment into steep slopes. As shown in Figure 4, there are a variety of unused easements, encroachments, and property encumbrances that are outdated. These easements would either be quitclaimed or vacated with the proposed project.

The proposed project is a subdivision map that would make currently non-complying lots comply more with the applicable City Zoning Ordinance (DMMC Title 30) and certified LCP

requirements by adjusting lot lines between existing lots to better accommodate the constraints of the environmental and land use regulations. The proposed project is limited to the subdivision map and development of utility lines, road modifications, and storage shed relocation. No further development has been requested by the project applicant on any of the proposed lots.

The proposed lot line adjustments are in compliance with subdivision requirements of the DMMC, with exception to proposed lot 1 which is proposed to maintain an existing non-conforming minimum street frontage. The proposed subdivision includes encroachments into required steep slope setbacks and proposed reductions in the required buffer from lagoon wetlands required by DMMC Chapters 30.52 (Bluff, Slope and Canyon) and 30.53 (Lagoon Overlay Zone).

Proposed development would be limited to site improvements for utility lines, widening and lengthening of the existing private road (to be named La Atalaya Way), formally paving the road connecting to San Dieguito which runs along proposed lots 5, 6, 7, and 8, and relocation of an existing storage shed. A low (3.5-foot maximum exposed) retaining wall would be necessary to widen and lengthen the existing private road, including the construction of a hammerhead turnaround. In addition, portions of the perimeter boundary wall, commonly called the “snake wall”, would be relocated to improve sight distances at the intersection of an adjacent public alley and San Dieguito Drive. Further development of lots 1, 2, 5, 6, 7, and 8 are not proposed at this time; however, this ISMND evaluates potentially significant impacts that could occur from full buildout of homes within the undeveloped lots.

This IS/MND analyzes the proposed project and assesses the full project area buildout consistent with the R1-40 – Very Low Density development standards in order to identify future environmental impacts from future development buildout. As vacant lots are proposed for development on proposed lots 1, 2, 5, 6, 7, and 8, future plans would be further evaluated by the City for potential impacts and compliance with applicable regulations and mitigation measures in this IS/MND.

<b>Table 1</b> <b>Proposed Lot Data</b> <b>(square feet)</b>			
Proposed Lot	Gross Area <sup>1</sup>	Net Area	Development Area <sup>2</sup>
1	41,108	41,108	5,904
2	47,505	47,505	4,180
3	173,386	173,386	N/A
4	270,130	270,130	N/A
5	47,876	43,036	13,455
6	46,987	42,524	24,573
7	51,834	41,009	21,235
8	110,013	110,013	16,828
N/A = not applicable <sup>1</sup> Assumes City of Del Mar will vacate the public right-of-way over the unimproved alley currently existing between a portion of proposed lots 2 and 4. <sup>2</sup> Based on Figure 3 (Proposed Lot Reconfiguration), the development area does not include any encroachment into substantially steep slopes as allowed by code.			

***Access***

Proposed lots 1 and 2 would be accessible via Zapo Road. Proposed lot 3 would be accessed off Gatun Road. Proposed lot 4 would be accessible via the existing gate at Serpentine Drive. San Dieguito Drive is located adjacent to the San Dieguito Lagoon. Proposed lots 5 through 8 are adjacent to San Dieguito Drive and would be accessible by formally paving the road connecting to San Dieguito which runs along proposed lots 5, 6, 7, and 8.

***Site Drainage***

The project site is comprised of vegetated steep slopes that descend from a centrally located ridge running northwesterly. The site drains from the ridge to the east, north, and west. The San Dieguito Lagoon and associated wetlands exist to the east of San Dieguito Drive along the easterly boundary of the subject property. The project site is located west of San Dieguito Drive. Drainage within the site is comprised of 11 drainage basins, each with different drainage patterns.

The majority of the drainage to the east and north of the ridge (basins 1, 5, 6, 7, 8, 9, and 10) is captured and conveyed in private drainage systems that comingle with roadway drainage at two drainage inlets along the westerly side of San Dieguito Drive. Each of the inlets is connected to a drainage pipe that runs under San Dieguito Drive and outlets into the San Dieguito Lagoon. Approximately 98 percent of the property would remain unchanged as a result of the project.

The proposed changes from the site improvements to utility lines, and widening and lengthening of the existing private road would be minimally invasive and existing drainage patterns would not be altered. As part of the project, private storm drain inlets are proposed which would be utilized to collect runoff from the lengthened and improved portion of the roadway (La Atalaya Way) and divert the runoff to a biofiltration basin for treatment. Runoff from the replaced portion of the roadway would be collected in a swale and routed to a biofiltration basin for treatment. Runoff from the relocated shed would also flow on the surface to a biofiltration basin for treatment. Since the runoff within the area of site improvements is conveyed off-site within storm drain pipes to the two drainage inlets along San Dieguito Drive, then conveyed within storm drain pipes to the San Dieguito Lagoon, the portion of the site under development is exempt from hydromodification.

**9. Surrounding Land Use(s) and Project Setting:**

San Dieguito Drive borders the northeast portion of the project site. The San Dieguito Lagoon is located northeast of San Dieguito Drive. The project site is surrounded on the southern, eastern, and northern boundaries by residential homes.

**10. Other Required Agency Approvals or Permits Required:**

None

**11. 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 this consultation begun?**

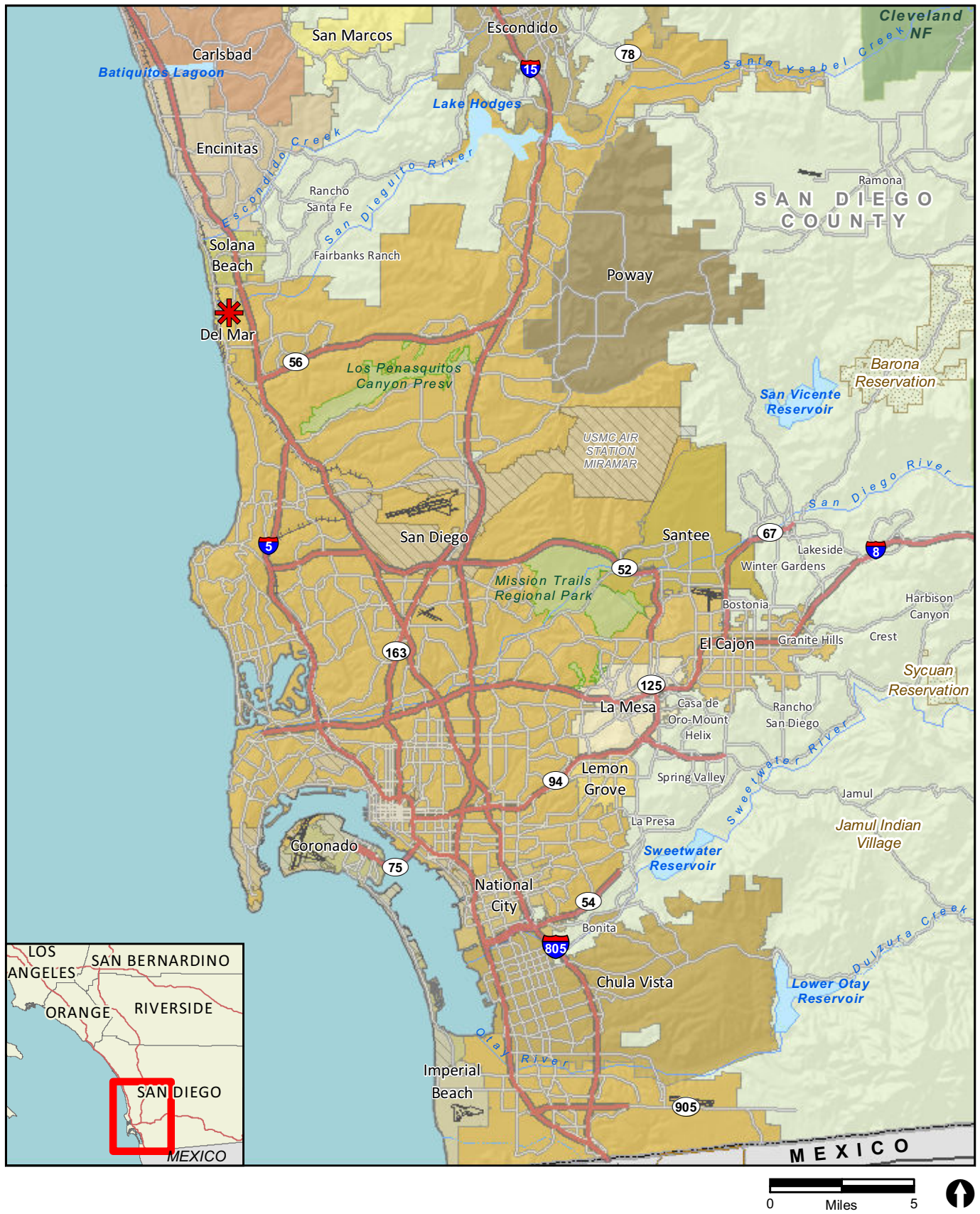
No

**12. Summary of Environmental Factors Potentially Affected:**

The project would have the following Potentially Significant Impacts to the resource areas listed below. A summary of the environmental factors potentially affected by this project are included below. These are environmental factors that consist of Potentially Significant Impacts that would be reduced from “Potential Impact” to “Less than Significant with Mitigation.” The potential impacts and mitigation are described in the Initial Study Checklist.

- |  |   |  |
|--|---|--|
| <input type="checkbox"/> Aesthetics                      | <input type="checkbox"/> Agriculture and Forestry Resources | <input type="checkbox"/> Air Quality                                   |
| <input checked="" type="checkbox"/> Biological Resources | <input checked="" type="checkbox"/> Cultural Resources      | <input type="checkbox"/> Energy  |
| <input checked="" type="checkbox"/> Geology/Soils        | <input type="checkbox"/> Greenhouse Gas Emissions           | <input type="checkbox"/> Hazards & Hazardous Materials                 |
| <input type="checkbox"/> Hydrology/Water Quality         | <input type="checkbox"/> Land Use/Planning                  | <input type="checkbox"/> Mineral Resources                             |
| <input type="checkbox"/> Noise                           | <input type="checkbox"/> Population/Housing                 | <input type="checkbox"/> Public Services                               |
| <input type="checkbox"/> Recreation                      | <input type="checkbox"/> Transportation                     | <input checked="" type="checkbox"/> Tribal Cultural Resources          |
| <input type="checkbox"/> Utilities/Service Systems       | <input type="checkbox"/> Wildfire                           | <input checked="" type="checkbox"/> Mandatory Findings of Significance |





 Project Location

**FIGURE 1**  
Regional Location

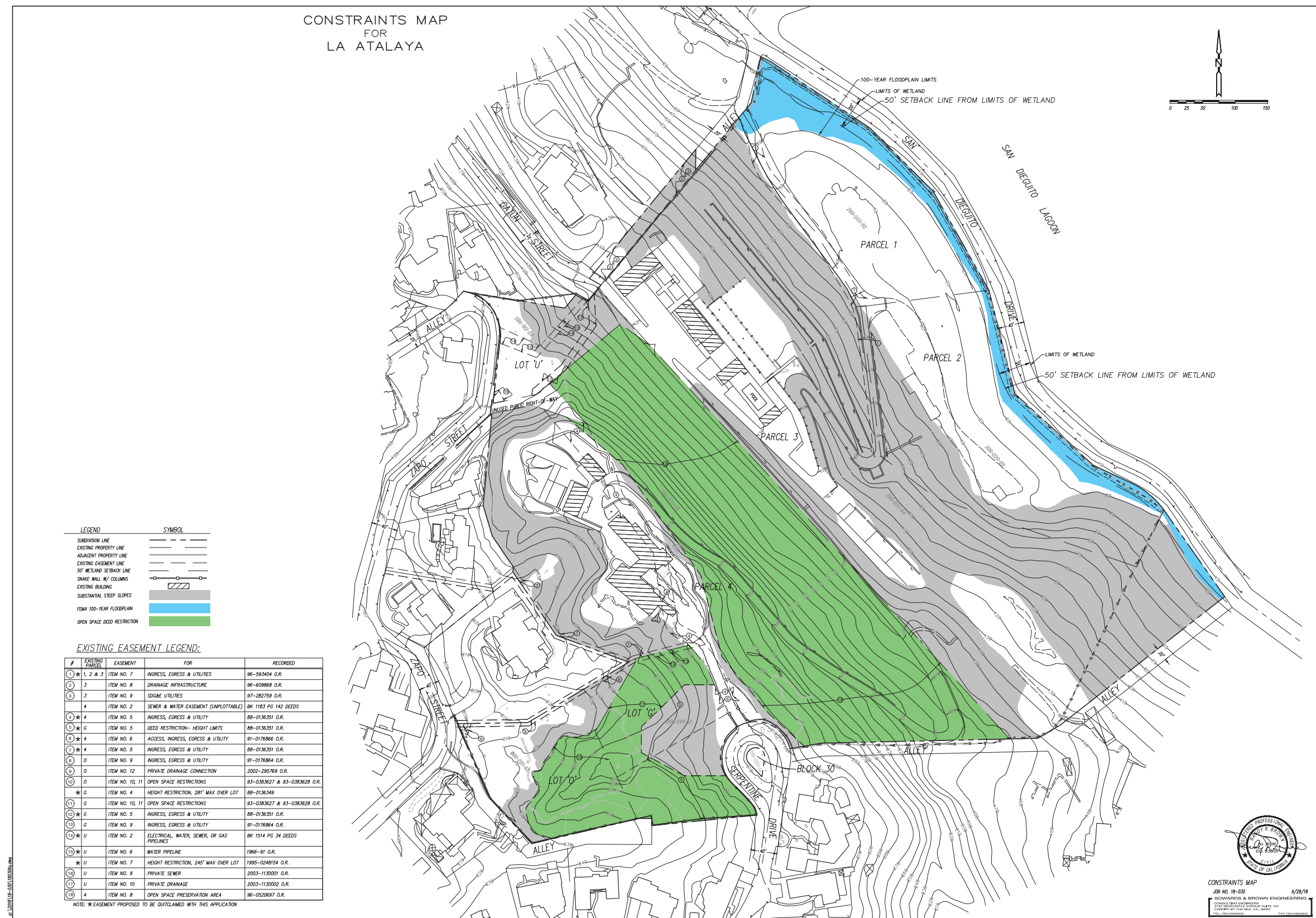




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FIGURE 2







PLANNING STUDY  
FOR  
LA ATALAYA

PROPOSED LOT DATA

PROPOSED LOT	GROSS AREA (1)	NET AREA	MAXIMUM F.A.R.	DEVELOPMENT AREA (2)	EXISTING COVERAGE	EXISTING F.A.R. (3)	LOT FRONTAGE	LOT WIDTH	LOT DEPTH
1	41,108	41,108	5.139	5,904	---	---	220'	184'	196'
2	47,505	47,505	5.398	4,180	---	---	215'	170'	270'
3	173,386	173,386	21.673	N/A	5.2%	3.6%	32'	139'	1,008'
4	270,130	270,130	33.766	N/A	3.3%	7.0%	266'	389'	572'
5	47,876	43,036	5.380	13,455	---	---	202'	195'	239'
6	46,987	42,524	5.316	24,573	---	---	149'	180'	267'
7	51,834	41,009	5.126	21,235	---	---	216'	210'	250'
8	110,013	110,013	13.752	16,828	---	---	24'	453'	250'

- (1) ASSUMES CITY OF DEL MAR WILL VACATE THE PUBLIC RIGHT-OF-WAY OVER THE UNIMPROVED ALLEY CURRENTLY EXISTING BETWEEN A PORTION OF PROPOSED LOTS 2 AND 4.  
(2) DOES NOT INCLUDE ANY ENCROACHMENT INTO SUBSTANTIALLY STEEP SLOPES AS ALLOWED BY CODE.  
(3) LOT 3 BUILDING AREA: 6,223 SF  
LOT 4 BUILDING AREA: 16,804 SF

SUBSTANTIAL STEEP SLOPE DATA

PROPOSED LOT	NET AREA	SUBSTANTIAL STEEP SLOPE AREA	SUBSTANTIAL STEEP SLOPE AREA / NET AREA	AREA OF LA ATALAYA WAY IMPROVEMENTS IN SUBSTANTIAL STEEP SLOPE AREA	AREA OF LA ATALAYA WAY IMPROVEMENTS IN SUBSTANTIAL STEEP SLOPE AREA / SUBSTANTIAL STEEP SLOPE AREA
1	41,108	24,682	60.0%	0	0
2	47,505	35,666	75.1%	0	0
3	173,386	91,280	52.7%	0	0
4	270,130	210,220	77.8%	0	0
5	43,036	15,285	35.5%	0	0
6	42,524	11,237	26.4%	0	0
7	41,009	17,951	43.8%	718	4.0%
8	110,013	80,995	73.6%	0	0

LEGEND	SYMBOL
SUBDIVISION LINE	---
PROPOSED PROPERTY LINE	---
EXISTING PROPERTY LINE	---
ADJACENT PROPERTY LINE	---
EXISTING EASEMENT LINE	---
PROPOSED SETBACK LINE	---
SUBSTANTIAL SLOPE SETBACK LINE	---
50' WETLAND SETBACK LINE	---
SHAKE WALL W/ COLUMNS	---
EXISTING BUILDING	---
RETAINING WALL	---
SUBSTANTIAL STEEP SLOPES	---
FEMA 100-YEAR FLOODPLAIN	---
OPEN SPACE DEED RESTRICTION	---
DEVELOPMENT AREA	---
PROPOSED ACCESS ROAD	---
POTENTIAL BUILDING FOOTPRINT TO REFLECT MAXIMUM F.A.R.	---

EXISTING EASEMENT TABLE:

#	EXISTING PARCEL	EASEMENT	FOR	RECORDED
1	1, 2 & 3	ITEM NO. 7	INGRESS, EGRESS & UTILITIES	96-593404 O.R.
2	3	ITEM NO. 8	DRAINAGE INFRASTRUCTURE	96-609868 O.R.
3	3	ITEM NO. 9	SOGAE UTILITIES	97-282759 O.R.
4, G, O	ITEM NO. 2	SEWER & WATER EASEMENT (UNPLOTTABLE)	8K1183 PG42 DEEDS (3/10/1928)	
4	★	ITEM NO. 5	UTILITY	88-0136351 O.R.
4	★	ITEM NO. 5	DEED RESTRICTION- HEIGHT LIMITS	88-0136351 O.R.
4	★	ITEM NO. 6	ACCESS, INGRESS, EGRESS & UTILITY	91-0176866 O.R.
7	★	ITEM NO. 5	UTILITY	88-0136351 O.R.
8	★	ITEM NO. 9	INGRESS, EGRESS & UTILITY	91-0176864 O.R.
9	★	ITEM NO. 12	PRIVATE DRAINAGE CONNECTION	2002-295769 O.R.
10	★	ITEM NO. 10, 11	OPEN SPACE RESTRICTIONS	93-0383627 & 93-0383628 O.R.
10	★	ITEM NO. 4	HEIGHT RESTRICTION, 28' MAX OVER LOT	88-0136349
11	★	ITEM NO. 10, 11	OPEN SPACE RESTRICTIONS	93-0383627 & 93-0383628 O.R.
12	★	ITEM NO. 5	INGRESS, EGRESS & UTILITY	88-0136351 O.R.
13	★	ITEM NO. 9	INGRESS, EGRESS & UTILITY	91-0176864 O.R.
14	★★U	ITEM NO. 2	ELECTRICAL, WATER, SEWER, OR GAS PIPELINES	8K 1514 PG 34 DEEDS (3/14/1928)
15	★★U	ITEM NO. 6	WATER PIPELINE	1966-91 O.R.
16	★	ITEM NO. 7	HEIGHT RESTRICTION, 245' MAX OVER LOT	1995-0248154 O.R.
17	★	ITEM NO. 9	PRIVATE SEWER	2003-1130001 O.R.
18	★	ITEM NO. 10	PRIVATE DRAINAGE	2003-1130002 O.R.
19	★	ITEM NO. 8	OPEN SPACE PRESERVATION AREA	96-0520697 O.R.
20	★★★	ALLEY ADJACENT TO EXIST. PARCEL 4/LOT 4	MAP 1343, REC. 6/08/1911	

NOTE: \* EASEMENT PROPOSED TO BE QUILCLAIMED WITH THIS APPLICATION  
\*\* EASEMENT PROPOSED TO BE VACATED WITH THIS APPLICATION  
\*\*\* ALLEY RIGHT-OF-WAY PROPOSED TO BE VACATED WITH THIS APPLICATION



PLANNING STUDY  
JOB NO. 18-032  
08/03/19  
SOWARDS & BROWN ENGINEERING  
15000 SOWARDS & BROWN DRIVE  
SAN DIEGO, CA 92128  
TEL: 619.594.0000 FAX: 619.594.0001

## 4.0 Initial Study Checklist

1. A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved. A “No Impact” answer should be explained where it is based on project specific factors as well as general standards.
2. 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.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
4. “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level.
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or (mitigated) negative declaration. Section 15063(c)(3)(D).
6. 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.
7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project’s environmental effects in whatever format is selected.
9. The explanation of each issue should identify:
  - a. The significance criteria or threshold, if any, used to evaluate each question; and
  - b. The mitigation measure identified, if any, to reduce the impact to less than significant.

## 4.1 Aesthetics

Would the project:

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### EXPLANATIONS:

#### a. Less than Significant Impact

The City has identified the Pacific Ocean, the North Bluff area, and the San Dieguito and Los Peñasquitos lagoons as scenic vistas. In order to provide context and to reduce duplicative analysis, “scenic vistas” are defined as views or vistas generally panoramic in nature and identified as viewpoints or vistas (e.g., formal turn-outs along roadways) or within planning documents. A substantial adverse effect on a scenic vista or view would occur where the majority of an existing view would be blocked or substantially interrupted.

The City of Del Mar Community Plan (Community Plan) is its “constitution for development”. The Community Plan includes goals and policies to preserve and enhance open space, natural resources, and the City’s special residential character and small-town atmosphere with its harmonious blending of buildings and landscape in proximity to a beautiful shoreline. According to the Community Plan, the City is characterized by scenic stretches of coastal beaches, picturesque sea cliffs, flat-topped coastal areas, steep mesa bluffs, broad level-floored stream valleys, and gently rolling hills (City of Del Mar 1985).

Applicable policies of the Community Plan (Community Development, Goal 3) related to visual resources and the character of development include the following:

- Objective A    Maintain a low-density residential character and allow only one and two story low mass intensity development in residential areas.
- Policy 4        Limit building height to two stories in all residential areas, prohibit three-story façades, and encourage single-story development in areas where two-story construction would be disruptive to neighborhood character and scale of development.
- Objective B    Ensure that future development, whether commercial or residential, does not detract from high-quality vistas and terrain, either by blocking views or disturbing natural topography, mature trees, or native growth.
- Policy 1        Strengthen height controls to protect scenic vistas from both private and public areas. Construction in areas of view sensitivity should require design approval to ensure protection, in an equitable manner, or the right to view scenic vistas from both near and far.
- Objective F    Protect and enhance human scale, warmth, charm, interest, texture, pedestrian involvement and landscaping.
- Policy 1        Encourage harmonious development which is in scale with the character of existing development.

All new residential development is subject to discretionary permit review in accordance with the City's Design Review Ordinance (DRO) (DMMC Chapter 23.08). The City's Design Review process is intended to preserve and improve the scenic amenities of Del Mar and to protect the City's natural environment, its scenic vistas and the community's overall aesthetic quality. The Design Review process encourages good design, including the use of harmonious materials and colors, and the appropriate use of landscaping.

As part of the review process, applications for Design Review Permits are evaluated for their consistency with the applicable provisions of DMMC Chapter 23.08 (Design Review) and DMMC Title 30 (Zoning Code). The City's DRO was adopted to implement and enforce the above-mentioned policies of the City's Community Plan.

All properties within the city are located within the California Coastal Zone as defined in the California Coastal Act and are accordingly subject to the provisions of the City's certified Local Coastal Plan (LCP). The LCP is composed of the certified Land Use Plan (LUP) and Implementing Ordinances that are incorporated into Title 30 (Zoning) of the DMMC. The LCP addresses shoreline resources and development policies and regulations aimed at preserving ocean views and coastal access, as well as beach, coastal bluffs, erosion control, and hazards.

To preserve scenic public ocean views and vistas, the City has adopted policies and regulations in place that are implemented through the City's Zoning Code (DMMC Title 30) and the DRO, which generally limit the design and potential massing of new development through criteria and development standards that require low-scale building height and floor area and preservation of scenic views (public and private). Additional local requirements that maintain protection of scenic vistas and visual resources are

implemented through the requirements of three overlay zones within the City's Zoning Code as further described below.

The Bluff, Slope, and Canyon Overlay Zone (DMMC Chapter 30.52) is applied to properties to implement existing Community Plan policies that protect scenic public views in areas such as the North Bluffs and San Dieguito Lagoon through implementation of a 14-foot height limit. The Bluff, Slope, and Canyon Overlay Zone requires a Conditional Use Permit for all new development in an effort to protect and maintain the City's sandstone bluffs, slopes, and canyons.

The Lagoon Overlay Zone (DMMC Chapter 30.52) applies to properties that are located directly in or along the San Dieguito Lagoon within the City's Floodway Zone and/or Floodplain Overlay Zone. The Lagoon Overlay Zone prohibits new development within wetlands and within sensitive upland resources. Development can generally be permitted within the Lagoon Overlay Zone with a Conditional Use Permit and Coastal Development Permit where it complies with the required wetland buffers.

The Open Space Overlay Zone (DMMC Chapter 30.60) is designed to protect open space areas of community-wide residents, define Del Mar as a distinct and separate community, ensure an atmosphere of openness, and preserve scenic vistas and particularly unique natural features in specific neighborhoods. Development can generally be permitted within the Open Space Overlay Zone with a Conditional Use Permit.

The project site is located within the Bluff, Slope, and Canyon; Lagoon; and Open Space Overlay Zones. Future development within the proposed vacant lots would require measures such as appropriate placement of buildings and supporting structures (e.g., parking areas), and limiting building heights in sensitive viewshed areas. Conformance with regulatory requirements appropriate for the overlay zones would help minimize impacts on existing views and scenic vistas. Additionally, future development would be required to adhere to all state and local requirements for avoiding violation of standards during construction and operations which could lead to impacts to vistas and view sheds, albeit temporarily, including the City's DRO, Tree Ordinance (DMMC Chapter 23.50), Zoning Code, and LCP. Conformance with all regulatory requirements would ensure that the proposed project would not have a substantial adverse effect on a scenic vista. Thus, impacts would be less than significant.

#### **b. No Impact**

No State Scenic Highways traverse the City or are in its vicinity. The nearest State-designated highway is a portion of State Route 163 running south from the northern boundary of Balboa Park to the southern boundary of the park. This State Scenic Highway is located approximately 15 miles south of the City. According to the California Department of Transportation (Caltrans), Interstate 5 (I-5) which runs east of the City boundary and east of the San Dieguito Lagoon is eligible to become an officially designated State Scenic Highway. However, the nearest segment of I-5 is located over one-half mile from the project site. As there are no State Scenic Highways located adjacent to or within immediate view of the project site, no impacts to scenic resources within a state scenic highway would occur (Caltrans 2020).



**c. Less than Significant Impact**

All future development within the project site would be reviewed to confirm compliance with all applicable requirements to protect and enhance the city's visual character and public views, including the City's Community Plan (General Plan), LCP, DMMC, and Design Review process including compatibility with surrounding land uses. Specifically, future development would be required to show appropriate landscaping, setbacks, height (including reduced height for development in the Bluff, Slope, and Canyon Overlay Zone), building articulation, and other design features as required by City development standards and the DRO. Conformance with these requirements would ensure the proposed project would not substantially degrade the existing visual character or quality of public views. Thus, impacts would be less than significant.

**d. Less than Significant Impact**

Future housing development within the project site could add new sources of light and glare. Potential new light sources would be primarily exterior nighttime lighting fixtures, parking area lighting, light glow from windows, doors and skylights, and accent lighting. Future development plans would be required to comply with all applicable requirements related to light and glare, including the California Green Building Standards Code (Part 11 of Title 24), the City's Community Plan (General Plan) and DRO. The DRO lighting policies and companion Citywide Design Guidelines (2017) ensure that new outdoor lighting associated with structures would not have substantial adverse effects. These standards require that outdoor lighting be directed downward and shielded away from surrounding properties and public rights-of-way. DMMC §23.08.077 requires that projects be consistent with existing neighborhoods, including ensuring that a project's design would not adversely affect the lighting quality of the local neighborhood and that exterior lighting be functional, shielded, and subtle or architecturally integrated with the building's style, materials, or colors.

Future housing development could also add new sources of glare. Glare is commonly associated with reflective surfaces, such as glass, rooftop solar panels, windows, heat-reflective roofing materials, and other building elements. DMMC §23.08.077 requires that projects not adversely affect the lighting quality of the local neighborhood. Further, to minimize glare, future project applicants may be required to install glass with low reflectivity, which would be required to meet California Building Code Title 24 standards. To minimize glare associated with rooftop solar panels, panels could be installed flat, treated with anti-reflective coatings, and manufactured from modern glass technology. Conformance with all regulatory requirements would ensure that the proposed project would not create a new source of substantial light or glare. Thus, impacts would be less than significant.



## 4.2 Agriculture and Forestry Resources

Would the project:

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with existing zoning for agricultural use, or a Williamson Act Contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. 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])?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### EXPLANATIONS:

#### a. No Impact

The project site is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (State of California Department of Conservation (DOC; 2016). Additionally, any future housing development within the project site would not impact agricultural resources by conversion to a non-agricultural usage. Thus, no impacts to Prime Farmland, Unique Farmland, or Farmland of Statewide Importance would occur.

#### b. No Impact

Only land located within an agricultural preserve is eligible for Williamson Act contracts. According to the DOC and San Diego County, the project site contains no designated agricultural preserves, and therefore, no lands under a Williamson Act contract (DOC 2016). Because the project site is not zoned for agricultural and is not subject to Williamson Act contracts, no impacts would occur.

**c. No Impact**

The project site is not designated or zoned for forestry uses, nor is the project site adjacent to any zoning for forest land or timberland. The proposed subdivision would allow for future residential development on vacant lots that would remain zoned for very low density residential development. Consequently, the project would not conflict with existing zoning nor would it cause rezoning of forest land, timberland, or timberland zoned Timberland Production. Thus, no impact would occur.

**d. No Impact**

As discussed in Section 4.2 (c), the project would not result in the loss of forest land or the conversion of forest land to non-forest use. Therefore, no impacts to forest resources would occur.

**e. No Impact**

The Farmland Mapping and Monitoring Program classifies the project site and surrounding properties as “urban and built up land” (DOC 2016). Future housing development within the project site would occur only on properties designated and zoned for residential use. Therefore, no impacts to agricultural or forest land resources would occur.

## 4.3 Air Quality

Would the project:

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**EXPLANATIONS:**

This section describes potential impacts related to air quality and is based on an Air Quality Report prepared for the project by RECON Environmental, Inc. dated July 6, 2020. The report is included as Attachment 1 to this IS/MND.

**a. Less than Significant Impact**

The San Diego Air Pollution Control District (SDAPCD) prepared the original 1991/1992 Regional Air Quality Strategy (RAQS) in response to requirements set forth in the California Clean Air Act (CAA). The RAQS is the applicable regional air quality plan that sets forth the SDAPCD's strategies for achieving the National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS). The SDAB is designated a non-attainment area for the federal and state ozone standard. Accordingly, the RAQS was developed to identify feasible emission control measures and provide expeditious progress toward attaining the standards for ozone. The two pollutants addressed in the RAQS are reactive organic gases (ROG) and nitrogen oxide (NO<sub>x</sub>), which are precursors to the formation of ozone. Projected increases in motor vehicle usage, population, and growth create challenges in controlling emissions and, by extension, to maintaining and improving air quality. The RAQS was most recently adopted in 2016.

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

No zoning or land use changes are proposed as a part of the project. As discussed, two of the lots are currently developed and six of the lots are vacant. No new development is proposed as a part of the project, and the project would not allow for increased development potential or density of the site. The project would be consistent with the regional growth projections anticipated by SANDAG, and emissions would be accounted for in the RAQS. Additionally, future development on the vacant sites would be required to adhere to all federal, state, and local requirements for minimizing construction and operational pollutant emissions, including: SDAPCD Rule 50 (Visible Emissions), Rule 51 (Nuisance), Rule 55 (Fugitive Dust), and Rule 67.0.01 (Architectural Coatings); the City's Community Plan (Transportation Goal 2, Objective F and Policies 1 and 2; and Environmental Management Goal 1, Objective H and Policy 12); and the DMMC (California Energy Code per Section 23.12.050; Solar Energy Ordinance in Chapter 23.20; Rooftop Solar Systems in Chapter 23.21; and Electric Vehicle Charging in Chapter 23.22 ). Thus, the project would not obstruct or conflict with implementation of the RAQS and impacts would be less than significant.

## b. Less than Significant Impact

The region is classified as an attainment area for all criterion pollutants except ozone, 10-micron particulate matter (PM<sub>10</sub>), and 2.5-micron particulate matter (PM<sub>2.5</sub>). The SDAB is a non-attainment area for the 8-hour federal and state ozone standards. Ozone is not emitted directly, but is a result of atmospheric activity on precursors. NO<sub>x</sub> and ROG are known as the chief “precursors” of ozone. These compounds react in the presence of sunlight to produce ozone. PM<sub>2.5</sub> includes fine particles that are found in smoke and haze, and are emitted from all types of combustion activities (motor vehicles, power plants, wood burning, etc.) and certain industrial processes. PM<sub>10</sub> includes both fine and coarse dust particles, and sources include crushing or grinding operations and dust from paved or unpaved roads.

Impacts to air quality could result from both project construction and future operations associated with build-out of the subdivision lots. The SDAPCD also does not provide specific numeric thresholds for determining the significance of air quality impacts under the CEQA Guidelines. However, the SDAPCD does specify Air Quality Impact Analysis “trigger” levels for criteria pollutant emissions associated with new or modified stationary sources (SDAPCD Rules 20.1, 20.2, and 20.3). The SDAPCD does not consider these trigger levels to represent adverse air quality impacts; rather, if these trigger levels are exceeded by emissions associated with a project, the SDAPCD requires an air quality analysis to determine if a significant air quality impact would occur. This analysis uses SDAPCD trigger levels shown in Table 2 as air quality impact screening levels.

Table 2 Air Quality Impact Analysis Trigger Levels			
Pollutant	Emission Rate (pounds/hour)	Emission Rate (pounds/day)	Emission Rate (tons/year)
NO <sub>x</sub>	25	250	40
SO <sub>x</sub>	25	250	40
CO	100	550	100
PM <sub>10</sub>	--	100	15
Lead	--	3.2	0.6
ROG	--	250	--
PM <sub>2.5</sub>	--	67	10
SOURCE: SDAPCD, Rules 20.1, 20.2, 20.3 (SDAPCD 2016).			
<sup>1</sup> ROG threshold based on federal General Conformity <i>de minimis</i> levels for ozone precursors.			

**Construction Emissions:** Project construction would be limited to site improvements for utility lines, the existing private road (to be named La Atalaya Way) to be widened and lengthened to allow access to proposed lots of the easterly side of the property, and an existing storage shed is proposed to be relocated. The air quality assessment considered construction emissions related to the proposed project improvements and assesses the full project area buildout consistent with the R1-40 – Very Low Density development standards. This allows a full buildout scenario assessment of potential impacts based on a full buildout of the vacant parcels. For modeling purposes, it was assumed construction would begin in January 2021 with standard dust control measures implemented as a part of project construction in accordance with SDAPCD rules and regulations.

Construction emissions were calculated and compared to the trigger levels. Details related to the calculations and modeling results are compiled in Attachment 1 and summarized in Table 3.

<b>Table 3</b> <b>Summary of Maximum Build-out Construction Emissions</b> <b>(pounds per day)</b>						
	ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Roadway and Utility Improvements	1	9	9	<1	<1	<1
Single-family Residence Construction						
Site Preparation	4	41	22	<1	2	12
Grading	2	25	16	<1	3	4
Building Construction	2	18	17	<1	1	1
Paving	1	11	15	<1	1	1
Architectural Coatings	8	1	2	<1	<1	<1
<b>Maximum Daily Emissions</b>	<b>8</b>	<b>41</b>	<b>22</b>	<b>&lt;1</b>	<b>3</b>	<b>12</b>
<i>Significance Threshold</i>	<i>250</i>	<i>250</i>	<i>550</i>	<i>250</i>	<i>100</i>	<i>67</i>

The construction emissions were compared to the significance thresholds shown in Table 2. As shown, maximum daily construction emissions associated with the project are projected to be less than the applicable thresholds for all criteria pollutants.

**Operational Emissions:** Operational emissions associated with the project include mobile and stationary sources. Mobile source emissions would originate from traffic generated by the project. According to the project's traffic report, the project would generate a maximum of 60 daily trips (Chen Ryan Associates 2020). Operational sources include consumer products, natural gas used in space and water heating, architectural coatings, and landscaping equipment. Hearths (fireplaces) and woodstoves are also a source of area emissions. As a worst-case analysis, all single-family residences were modeled with a wood-burning fireplace. Details related to the specific emission inputs, calculations, and modeling results are compiled in Attachment 1 and summarized in Table 4.

<b>Table 4</b> <b>Summary of Maximum Build-out Operational Emissions</b> <b>(pounds per day)</b>						
	Pollutant					
	ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Area Sources	26	<1	29	<1	4	4
Energy Sources	<1	<1	<1	<1	<1	<1
Mobile Sources	<1	<1	1	<1	<1	<1
<b>Total</b>	<b>26</b>	<b>1</b>	<b>30</b>	<b>&lt;1</b>	<b>4</b>	<b>4</b>
<i>Significance Threshold</i>	<i>250</i>	<i>250</i>	<i>550</i>	<i>250</i>	<i>100</i>	<i>67</i>
NOTE: Totals may vary due to independent rounding.						

As shown, project-generated emissions are projected to be less than the significance thresholds for all criteria pollutants.

**Air Quality Emission Conclusions:** Emissions of ozone precursors (ROG and NO<sub>x</sub>), PM<sub>10</sub>, and PM<sub>2.5</sub> from construction and operation would be below the applicable thresholds for all criteria pollutants. These thresholds are designed to provide limits below which project emissions would not significantly change regional air quality. Thus, the project would not

result in a cumulatively considerable net increase in emissions of ozone, PM<sub>10</sub>, or PM<sub>2.5</sub>, and impacts would be less than significant.

**c. Less than Significant Impact**

Sensitive land uses include schools and schoolyards, parks and playgrounds, daycare centers, nursing homes, hospitals, and residential communities. There are residential uses located in the vicinity of the project site.

Project construction would result in short-term diesel exhaust emissions from on-site heavy-duty equipment. Construction activities would result in the generation of diesel-exhaust diesel particulate matter (DPM) emissions from the use of off-road diesel equipment.

Generation of DPM from construction projects typically occurs in a single area for a short period. According to the Office of Environmental Health Hazard Assessment (OEHHA), health risk assessments, which determine the exposure of sensitive receptors to toxic emissions, should be based on a 30-year exposure period; however, such assessments should be limited to the period/duration of activities associated with the project (OEHHA 2015). Construction activities would be short-term and would only be a fraction of the total exposure period used for health risk calculation.

Therefore, because of the limited size of the project and the short duration of construction, DPM generated by project construction is not expected to create conditions where the probability is greater than 10 in 1 million of contracting cancer for the Maximally Exposed Individual or to generate ground-level concentrations of non-carcinogenic toxic air contaminants that exceed a Hazard Index greater than 1 for the Maximally Exposed Individual. Additionally, with ongoing implementation of U.S. Environmental Protection Agency (U.S. EPA) and California Air Resources Board (CARB) requirements for cleaner fuels; off-road diesel engine retrofits; and new, low-emission diesel engine types, the DPM emissions of individual equipment used for future construction activities would be substantially reduced over time. Therefore, construction would not expose sensitive receptors to substantial pollutant concentration.

A CO hot spot is an area of localized CO pollution that is caused by severe vehicle congestion on major roadways, typically near intersections. CO hot spots have the potential to violate state and federal CO standards at intersections, even if the broader basin is in attainment for federal and state levels. Due to increased requirements for cleaner vehicles, equipment, and fuels, CO levels in the state have dropped substantially. All air basins are attainment or maintenance areas for CO. Therefore, recent screening procedures based on more current methodologies have been developed. The Sacramento Metropolitan Air Quality Management District developed a screening threshold in 2011, which states that any project involving an intersection experiencing 31,600 vehicles per hour or more will require detailed analysis. In addition, the Bay Area Air Quality Management District developed a screening threshold in 2010, which states that any project involving an intersection experiencing 44,000 vehicles per hour would require detailed analysis. No intersections in the vicinity of the project carry this substantial amount of traffic. Additionally, traffic generated by the project would be minimal and would not result in any

heavily congested intersections. Thus, the project is not anticipated to result in a CO hot spot.

#### d. Less than Significant Impact

The project does not include heavy industrial or agricultural uses that are typically associated with odor complaints. During construction, diesel equipment may generate some nuisance odors. Sensitive receptors near the project site include residential uses; however, exposure to odors associated with project construction would be short term and temporary in nature. Residential uses do not typically include operational sources of objectionable odors. Thus, operation of the project is not expected to generate significant objectionable odors affecting a substantial number of people, and impacts would be less than significant.

## 4.4 Biological Resources

Would the project:

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Have substantial adverse effects, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Have a substantial adverse effect on any riparian habitat or other community identified in local or regional plans, policies, and regulations or by the CDFW or USFWS?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
d. 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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**EXPLANATIONS:**

This section describes potential impacts related to biological resources and is based on a Biological Resources Report prepared for the project by Klutz Biological Consulting dated September 21, 2020. The report is included as Attachment 2 to this IS/MND.

**a. Potentially Significant Unless Mitigation Incorporated**

The Biological Resources Report observed six special status plant species within the project site: Torrey pine, sea dahlia, San Diego barrel cactus, Del Mar manzanita, Nuttall's scrub oak, and wart-stemmed ceanothus. With the exception of individual Torrey pine trees, direct impacts to sensitive species are not anticipated because these species are not found within the proposed reconfigured lots. As shown in Figure 4 in Attachment 2, the individual Torrey pine trees, future project development would be required to implement measures pursuant to the City's Tree Ordinance (DMMC Section 23.50) and associated Public Tree Policy Manual (2004) that would reduce significant impacts to Torrey pine trees to a level less than significant.

A total of four special-status wildlife species were recorded in the project area, including monarch, Belding's orange-throated whiptail, coastal California gnatcatcher, and Belding's savannah sparrow. Because these wildlife species are highly mobile, it is unlikely that the proposed development would result in the direct loss of individuals.

No coastal California gnatcatchers were observed during focused surveys in 2019. While the proposed widening and improvements to the existing road, and relocation of the shed, which is part of the current development plan, would not directly or indirectly impact



coastal California gnatcatchers or their habitat, future development within the proposed lots could result in a significant impact to nesting birds. Mitigation measure BIO-1, as set forth in detail in the MMRP, would ensure future development applications shall be required to submit site-specific biological surveys to delineate the precise location of sensitive habitat and assess project-specific impacts. Each project that is proposed for construction would be individually analyzed whether their development has the potential to directly or indirectly impact coastal California gnatcatchers.

The project area supports native habitats, non-native vegetation, and ornamental vegetation which could provide potential nesting and foraging habitat for a variety of songbirds and raptors in the area. Although no active or inactive nests were identified during the surveys, there is a potential for birds to nest within the project site. If future development occurs during the bird breeding season (February 1 through August 31), a significant impact to nesting raptors and other nesting birds could occur as a result of vegetation clearing activities. Mitigation measure BIO-2, as set forth in detail in the MMRP, outlines protection measures which would be required to avoid impacts to nesting bird species covered under the Migratory Bird Treaty Act, through either construction avoidance of the bird breeding season or breeding bird surveys.

Through implementation of the MMRP, mitigation measures BIO-1 and BIO-2 would reduce impacts to species identified as a candidate, sensitive, or special status species to a level less than significant.

#### **b. Potentially Significant Unless Mitigation Incorporated**

Two sensitive habitat types occur within the project site, Southern Maritime Chaparral and Torrey Pine Forest. Each of these habitat types is considered rare. Although the proposed project would not directly impact sensitive habitat, future development based on the conceptual plans would result in impacts to both Southern Maritime Chaparral and Torrey Pine Forest. Table 5 details the potential conceptual project impacts to land cover types within each of the newly created lots and the driveway impacts. Figures 5a and 5b show potential future impacts to biological resources.

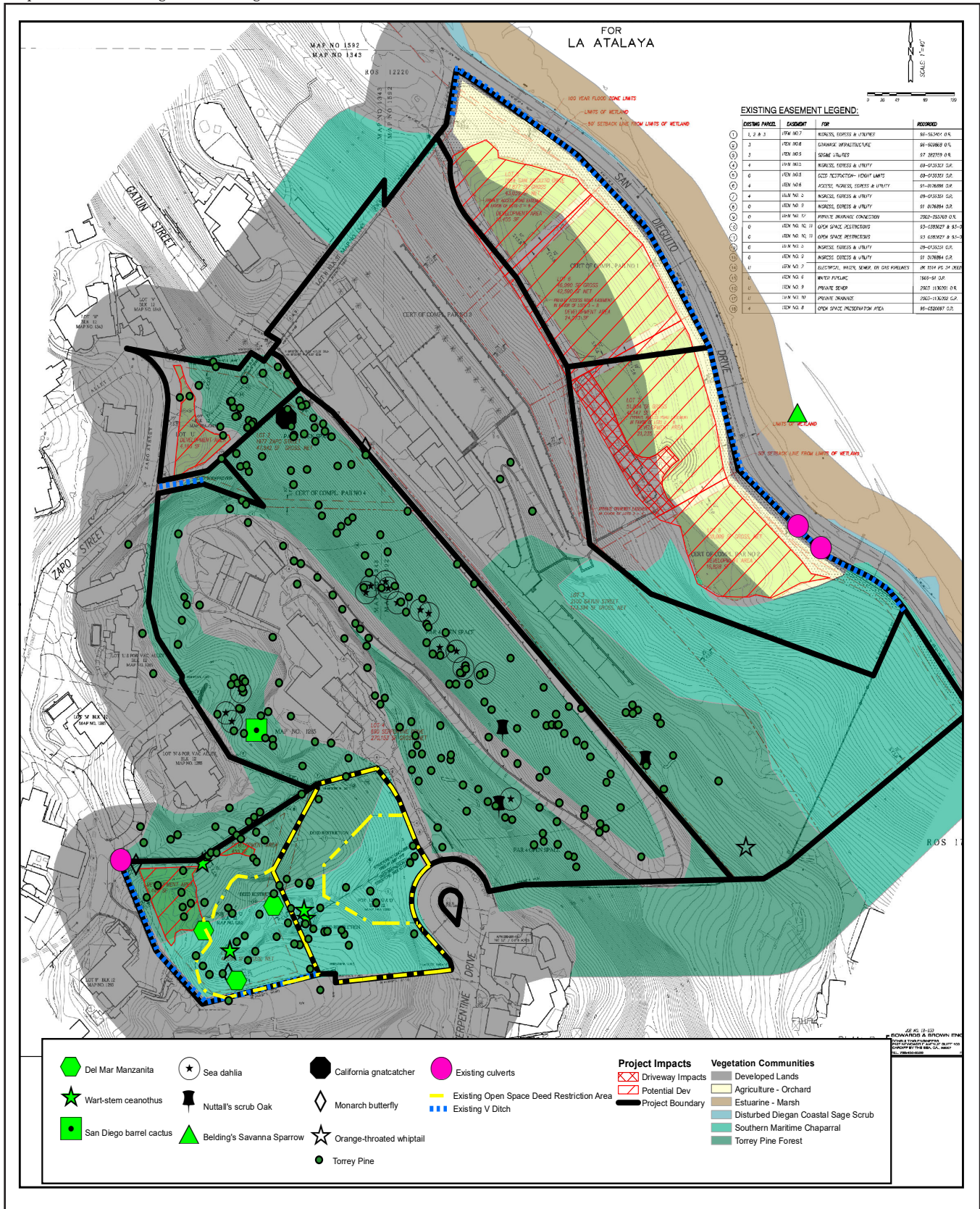
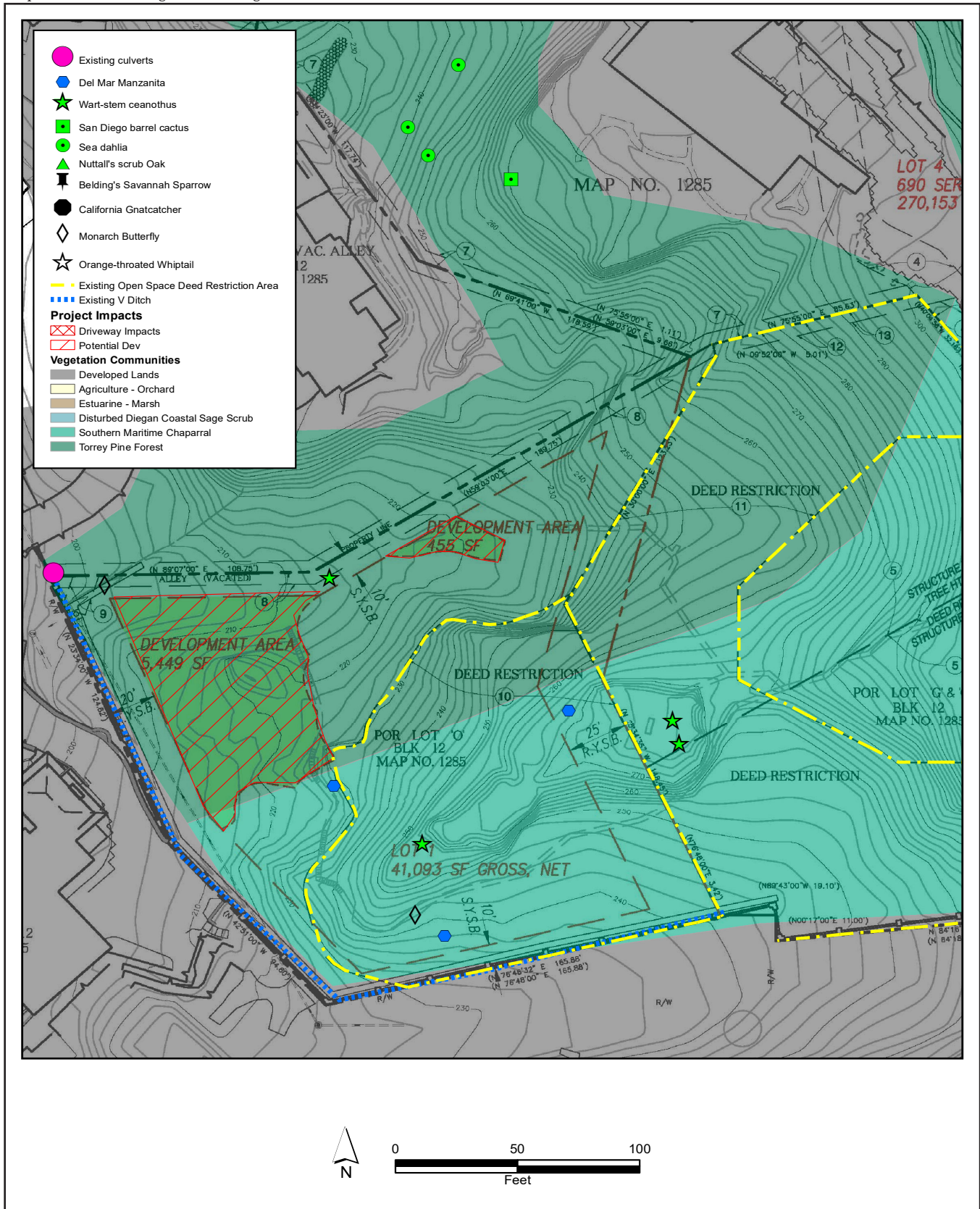


FIGURE 5a  
Project Impacts to  
Biological Resources





**FIGURE 5b**  
Project Impacts to  
Biological Resources

<b>Table 5 Vegetation Community Impacts by Lot</b>			
<b>Lot</b>	<b>Square Feet</b>	<b>Impact Areas</b>	<b>Required Mitigation (3:1 for SMC &amp; TPF)</b>
<b>Lot 1</b>			
Southern Maritime Chaparral (SMC)	53.73	0.001	0.003
Torrey Pine Forest (TPF)	5,893.64	0.14	0.42
<b>Lot 2</b>			
Developed Lands (DEV)	4,186.94	0.10	NA
<b>Lot 5</b>			
Orchard (ORC)	6,496.22	0.15	NA
Developed Lands (DEV)	11,496.19	0.26	NA
<b>Lot 6</b>			
Orchard (ORC)	12,696.11	0.29	NA
Developed Lands (DEV)	19,285.52	0.44	NA
<b>Lot 7</b>			
Orchard (ORC)	16,980.52	0.39	NA
Developed Lands (DEV)	6,790.35	0.16	NA
<b>Lot 8</b>			
Southern Maritime Chaparral (SMC)	86.16	0.002	0.006
Orchard (ORC)	12,053.52	0.28	NA
Developed Lands (DEV)	5,770.39	0.13	NA
<b>Driveway Impacts (Connects Lot 7 to Lot 8)</b>			
Orchard (ORC)	765.89	0.02	NA
Developed Lands (DEV)	6,753.58	0.15	NA
<b>Total</b>	<b>109,308.80</b>	<b>2.51</b>	<b>0.0429</b>

Future development projects would be required to implement mitigation measures as set forth in the MMRP. As described in mitigation measure BIO-1, impacts to Torrey Pine Forest and Southern Maritime Chaparral would be mitigated at a 3:1 ratio either on-site or in a City-approved off-site location. Additionally, mitigation measure BIO-1 would ensure future development applications be required to submit site-specific biological surveys to delineate the precise location of sensitive habitat and assess project-specific impacts. Thus, implementation of mitigation measure BIO-1 would reduce impacts from future development to sensitive habitats to a level less than significant.

### **c. Less than Significant Impact**

As shown in Figures 5a and 5b of the project's Biological Resources Report, the proposed project would not directly impact jurisdictional waters or wetlands. However, due to the proximity of the project relative to adjacent off-site wetland habitat located within the San Dieguito Lagoon, indirect impacts associated with the proposed development could result in a significant biological impact.

In order to avoid indirect impacts and to comply with existing City policies, the establishment of a wetland buffer would be required. The project proposes to incorporate a minimum 50-foot wetland buffer on proposed lots 5, 6, 7, and 8. The buffer begins along the edge of the lagoon vegetation and pavement edge on the northern boundary of San Dieguito Road. The existing road footprint and historic snake wall that occurs along the project boundary would remain within the buffer. Beyond the snake wall, the project would

implement an additional 15 to 22 feet of wetland buffer on lots 5 through 8. All project improvements would occur outside of the on-site wetland buffer.

The project proposes a 50-foot wetland buffer instead of a standard 100-foot buffer because of the location of San Dieguito Road and the existing on-site historic snake wall, which consists of a 6-foot-tall masonry barrier that isolates the project boundary from off-site wetland resources. The snake wall has served well to prevent domestic animals and people from entering the wetlands and causing any damage. Implementation of a full 100-foot wetland buffer would not improve the security of the San Dieguito wetlands and is a rather arbitrary number given the development conditions that existed for decades prior to the implementation of the City's wetland buffer policy. Reduction in the wetland buffer would not adversely affect the wetlands from the existing conditions in any way. However, establishment of a 100-foot wetland buffer would substantially limit the development of the parcels at the northern portion of the site and thus push the proposed development associated with this action into steep slopes that would adversely impact southern maritime chaparral and create visual impacts.

Thus, the wetland habitat associated with the San Dieguito Lagoon would not be directly or indirectly impacted by the proposed lot reconfiguration or the driveway improvements. Furthermore, as shown in Figures 5a and 5b the v-ditches that occur on-site would not be impacted by proposed lot reconfiguration or the driveway improvements. Reduction of the wetland buffer from 100 feet to 50 feet would not adversely affect the function or aesthetics of the wetland and it would avoid other more significant impacts to upland vegetation and habitat areas. Thus, impacts would be less than significant.

#### **d. Potentially Significant Unless Mitigation Incorporated**

The project site supports native habitats, non-native vegetation and ornamental vegetation which could provide potential nesting and foraging habitat for a variety of songbirds and raptors in the area. Although no active or inactive nests were identified during the surveys, there is a potential for birds to nest within the study area. If future development occurs during the breeding season (February 1 to July 15 for raptors and January 15 to August 31 for other birds), nesting raptors and other nesting birds could be directly impacted by vegetation clearing activities. Mitigation measure BIO-2 would be required to avoid impacts to nesting bird species covered under the Migratory Bird Treaty Act, through either construction avoidance of the bird breeding season or breeding bird surveys. Conformance with mitigation measure BIO-2 would reduce potential impacts to native species to a level less than significant.

#### **e. Less than Significant Impact**

As stated in Section 4.4 (a) above, Torrey pine trees are located within the project site. Implementation of the City's Tree Ordinance (DMMC Section 23.50) and associated Public Tree Policy Manual (2004) would reduce significant impacts to Torrey pine trees to a level less than significant.

#### **f. No Impact**

The County of San Diego Multiple Species Conservation Program (MSCP), adopted in 1997, is a comprehensive, habitat conservation planning program for the San Diego region, and

currently consists of 11 planning subareas. However, no MSCP Subarea Plan or Draft Subarea Plan has been prepared for the City at this time; nor does the City have any other approved local, regional, or state habitat conservation plan. Thus, no impacts would occur.

## Mitigation Measures

### *Sensitive Habitat*

Table 5 summarizes the mitigation measures which are based on the conceptual plans. The project has designated four potential on-site mitigation areas (Figure 6 and Table 6). The first mitigation area is located along the northeastern section of the property. This habitat area is contiguous with the off-site open space both north and east of the property. The second mitigation area is located on lot 4 and the third and fourth mitigation areas are located on lot 2. The mitigation areas on lots 4 and 2 are connected via previously conserved habitat located on lot 4. The on-site habitat mitigation areas have the capacity to fully mitigate habitat-based impacts associated with the future developments of lots 1 and 8. The other lots (2, 3, 4, 5, 6, and 7) would not result in impacts requiring habitat-based mitigation. Eventually, as future development plans are brought forward, additional evaluation by the City would be required to determine project-level impacts and mitigation. The exact quantities and exact boundaries of the required habitat mitigation will be calculated during the review of each individual development, consistent with the mitigation measures identified herein. This could include additional avoidance or impact minimization measures.

<b>Table 6</b>		
<b>On-Site Mitigation Areas</b>		
<b>Mitigation Areas</b>	<b>Torrey Pine Forest</b>	<b>Southern Maritime Chaparral</b>
2A	0.72 acre	0.0
2B	0.05 acre	0.0
3A	0.74 acre	0.15 acre
4A	0.03 acre	0.28 acre
8A	0.01 acre	0.51 acre
8B	0.0	0.58 acre
<b>Total</b>	<b>1.55 acres</b>	<b>1.52 acres</b>

The 1.55 total acres of Torrey Pine Forest mitigation allows for the loss of up to 0.52 acre of existing Torrey Pines habitat on lot 1. The 1.52 total acres of southern maritime chaparral mitigation allows for the loss of up to 0.51 acre of southern maritime chaparral habitat on lots 1 and 8.



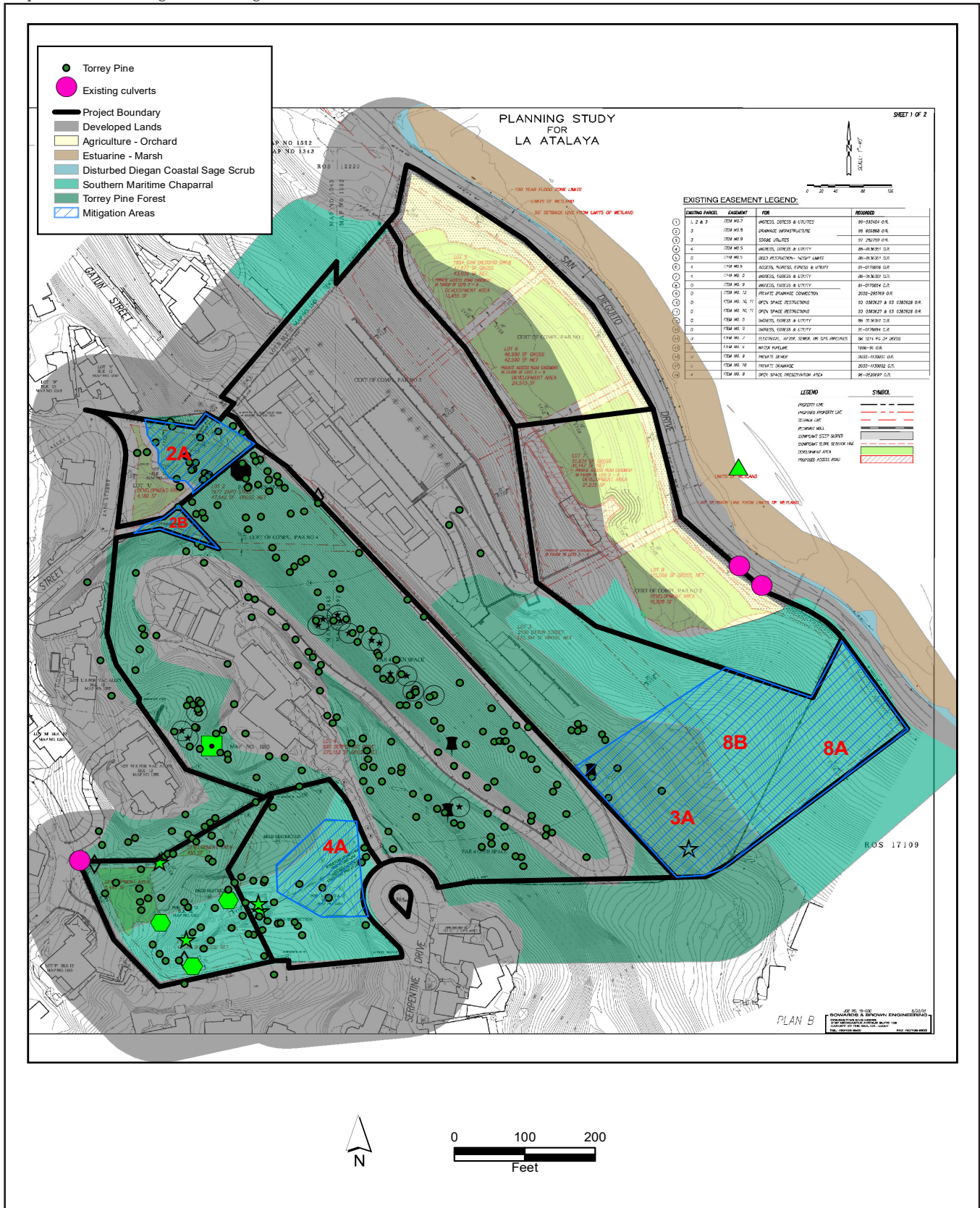


FIGURE 6  
Project Mitigation

**Mitigation Measure BIO-1**

Prior to the issuance of any building permit for future home development on lots 1 and 8, site-specific biological surveys shall be conducted to delineate the precise location of sensitive habitat and assess project-specific impacts. The biological survey shall include:

1. The methods used to determine the presence of sensitive biological resources;
2. Vegetation mapping of all vegetation communities and/or land cover types;
3. The locations of any sensitive plant or wildlife species;
4. An evaluation of the potential for occurrence of any listed, rare, and narrow endemic species; and
5. An evaluation of the significance of any potential direct or indirect impacts from the proposed project.

If potentially significant impacts to sensitive biological resources are identified, future project level grading and site plans shall incorporate project design features to minimize direct impacts on sensitive resources to the extent feasible, and the report shall also review the mitigation already identified and dedicated as deed restricted open space on the Final Subdivision Map. Figure 5 shows the areas that will be deed restricted open space upon recordation of the Final Subdivision Map and identifies the habitat type and area of each mitigation open space. By setting aside four future mitigation areas (as shown on Figure 5) each development already has enough mitigation available to fully mitigate for their proposed project-based impacts. If the specific plans for homebuilding result in habitat impacts greater than the mitigation set aside in the Final Subdivision Map specified above, then the site-specific biological surveys required for lots 1 and 8, as applicable, shall also recommend appropriate mitigation to be implemented by the future homebuilding applicant to reduce the impacts to below a level of significance. No future site-specific biological surveys and no habitat mitigation is required for issuance of any permits related to lots 3 through 7.

**Mitigation Measure BIO-2**

If future development occurs during the breeding season (February 1 to July 15 for raptors and January 15 to August 31 for other birds) and otherwise cannot be avoided, the applicant shall be responsible for a qualified biologist to conduct a pre-construction nesting bird survey prior to the commencement of any ground disturbing activities to determine the presence/absence, location, and status of any active nests on or adjacent to the survey area. The extent of the survey buffer area surrounding each site shall be established by the qualified biologist to ensure that direct and indirect effects to nesting birds are avoided. To avoid the destruction of active nests and to protect the reproductive success of birds protected by the Migratory Bird Treaty Act and the California Fish and Game Code and minimize the potential for project delay, nesting bird surveys shall be performed by the qualified biologist prior to project commencement. In the event that active nests are discovered, the biologist shall recommend suitable noise attenuation measures or a suitable buffer (distance to be determined by the biologist) shall be established around such active nests, and no construction within the buffer shall be allowed until the biologist has determined that the nest(s) is no longer active (i.e., the nestlings have fledged and are no



longer reliant on the nest). Completion of this mitigation measure shall be a condition of any future homebuilding permits issued for any of the lots included in the La Atalaya Final Subdivision Map.

## 4.5 Cultural Resources

Would the project:

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Cause a substantial adverse change in the significance of an historical resource pursuant to §15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Disturb human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### EXPLANATIONS:

This section describes potential impacts related to cultural resource issues and is based on review of the Historical Resources Survey prepared by RECON Environmental Inc. dated March 30, 2020. The Historical Resources Survey is included as Attachment 3 to this IS/MND. Additionally, a Historic Evaluation Report was prepared by Heritage Architecture & Planning on May 12, 2020 in order to assess the snake wall structure located within the project site. The Historic Evaluation Report is included as Attachment 4 to this IS/MND.

#### a. Potentially Significant Unless Mitigation Incorporated

As discussed in the Historical Resources Survey (see Attachment 3), a self-records search with a one-mile radius buffer was conducted on February 19, 2020, at the California Historical Resources Information System, South Coast Information Center at San Diego State University. The self-search was conducted to determine if previously recorded prehistoric or historic cultural resources occur on the property. No previously recorded cultural resources were found to occur within the project site.

The “snake” wall is located on the project site and is adjacent to neighboring properties. The Historic Evaluation Report (see Attachment 4) assessed the potential eligibility for national, state, or local historic registers of the snake wall structure. The circa 1930s La Atalaya snake wall is a simple board-formed concrete wall with a stucco finish. Its most ornate feature is the arched entry gate at the top of the hill at the end of Serpentine Drive.

This gate retains much of its Spanish-Revival design including the arch with a scalloped parapet. The gate also retains its deep cornice and original band of colorful glazed tile with “La Atalaya” spelled out above the arched opening. The wrought iron gates with intricate scrolls and other flourishes are extant. Modifications include the widening of the main gate opening for fire truck access and the addition of vehicular gate openings at lots 2 and 5. Despite these alterations, the snake wall still retains the majority of its character-defining appearance and design integrity.

In addition, the structure was designed as part of the overall Burnett property by Master Architect Richard Requa during the height of his architectural career. It also appears that there are no known comparative walls of this size designed by the architect within the City of Del Mar nor the county of San Diego. Moreover, Requa’s studies abroad and subsequent published books on the Spanish style of architecture, which highly influenced his design style, were also sponsored by Coy Burnett’s company, the Monolith Portland Cement Company, during this same period. This style is evident at La Atalaya and was incorporated into Burnett’s auxiliary buildings and the entry gate to the property.

The California Register of Historical Resources (“California Register” or “CRHR”) identifies historical and archeological resources significant to the state. The eligibility requirements for listing in the California Register are very similar to the eligibility requirements for listing in the National Register, though they have a somewhat stronger focus on California-specific issues. More specifically, to qualify as an historical resource for purposes of the California Register, a resource must meet at least one of four criteria:

**Criterion 1:** Associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage,

**Criterion 2:** Associated with the lives of persons important to local, California, or national history,

**Criterion 3:** Embodies the distinctive characteristics of a type, period, region or method of construction or represents the work of a master or possesses high artistic value, or

**Criterion 4:** Has yielded or has the potential to yield information important to the prehistory or history of the local area, California, or the nation.

Since the structure is locally rare in the City of Del Mar and enough of the resource survives to its circa 1930s period of significance encompassing its date of construction, it is, therefore, considered a significant resource under Criterion C at the local level of significance. While damage or demolition of the wall as a result of the proposed project would result in a significant impact to a historic resource, mitigation measure CUL-1, through implementation of the MMRP would require Historic American Building Survey (HABS) documentation to reduce potential impacts to the snake wall to a level less than significant.

**b. Potentially Significant Unless Mitigation Incorporated**

A letter was sent to the California Native American Heritage Commission (NAHC) on February 19, 2020, requesting a search of their Sacred Lands File. The NAHC sent a reply on March 4, 2020, indicating that they had no record of Native American cultural resources in the immediate area of the project; however, they included a list of Native American tribes who may have knowledge of cultural resources within the project site. The field survey was conducted on February 26, 2020, by RECON archaeologist Nathaniel Yerka, accompanied by Gabe Kitchen and Gretchen White, Native American monitors from Red Tail Environmental. Also in attendance were David Marshall from Heritage Architecture & Planning, Greg Shannon from Sedona Pacific Corporation, and Jean Crutchfield from the City. No significant or potentially significant prehistoric or historic archaeological resources were found during the survey. The possibility of buried significant cultural resources being present within the project area is considered low because a considerable portion of the project area has been disturbed during past development. Included within the area of disturbance is the olive orchard and associated gravel parking area. However, this area is known to have received fill soils which may have capped possible cultural material associated with the San Dieguito Lagoon. Therefore, grading activities associated with the widening and improvement of the existing road, utility lines, and removal of the shed could result in significant impacts to unknown archeological resources. Likewise, ground disturbing activities needed to develop within the future lots could unearth potentially significant archeological resources.

Because the project includes ground-disturbing activities, mitigation measure CUL-2, as set forth in detail in the MMRP, requires a qualified archaeological monitor and Native American monitor be present for any ground-disturbing activities in case unexpected intact subsurface deposits or features are uncovered. Additionally, mitigation measure CUL-3 would reduce potential future impacts to archaeological resources by requiring a qualified archaeologist to conduct an archaeological survey and archaeological resource report to evaluate the potential presence of cultural resources and the need for project specific mitigation which could include preservation, relocation, or other methods as each development is individually proposed. Through implementation of the MMRP, mitigation measures CUL-2 and CUL-3 would reduce potential impacts related to archaeological resources to a level less than significant.

**c. Less than Significant Impact**

There are no known burial sites or cemeteries near the City. Therefore, it is not expected that human remains would be disturbed as a result of future development on the vacant sites. However, the discovery of human remains is always a possibility during ground disturbing activities. In the unlikely event that human remains are discovered during project construction or future development within the project site, work shall halt in that area and the procedures set forth in the California Public Resources Code (Section 5097.98) and State Health and Safety Code (Section 7050.5) would be implemented in consultation with the assigned most likely descendant as identified by the Native American Heritage Commission. In this event, no further construction activities would be permitted until the coroner is contacted, as well as any applicable Native American tribes. The City would be required to comply with the California Native American Graves Protection and

Repatriation Act (2001) and the Federal Native American Graves Protection and Repatriation Act (1990). As regulations are in place to respond to any inadvertent uncovering of human remains during grading, impacts to human remains would be less than significant.

## **Mitigation Measures**

### **Mitigation Measure CUL-1**

Prior to modification of the snake wall, the project applicant shall hire a professional who is qualified to complete the Secretary of the Interior's Standards for Architectural and Engineering documentation in order to mitigate the Snake Wall in the form of the equivalent to HABS documentation. HABS level I documentation includes a full set of drawings depicting existing or historic conditions and large format negative photographs in black and white of exterior and interior views to add to the written history and description in the existing report titled La Atalaya – Snake Wall Historic Evaluation Report. The drawings shall include a site plan, elevations, cross sections, and details of construction techniques and architectural elements.

### **Mitigation Measure CUL-2**

Unanticipated Discovery of Tribal Cultural and Archaeological Resources: Upon discovery of any tribal, cultural, or archaeological resources during ground-disturbing activities, the Applicant shall immediately cease such activities in the immediate vicinity. The find will then be assessed by a qualified archeologist retained by the Applicant and a tribal monitor/consultant approved by the consulting tribe. The Applicant shall promptly notify the Planning and Community Development Director to the discovery of resources. If the resources are Native American in origin, the consulting tribe shall coordinate with the landowner regarding treatment and curation of these resources. Typically, the tribe will request preservation in place or recovery for educational purposes. At the direction of the qualified archaeologist and tribal monitor/consultant, and in coordination with the Planning and Community Development Department, work may continue on other parts of the affected site while evaluation and, if necessary, additional protective measures are completed at the affected portion of the site pursuant to State CEQA Guidelines §15064.5[f]. If a resource is determined by the qualified archaeologist to constitute a "historical resource" or "unique archaeological resource," time and funding to allow for sufficient implementation of avoidance measures must be made available. The treatment plan established for the resources shall be in accordance with State CEQA Guidelines §15064.5(f) for historical resources.

Preservation in place (i.e., avoidance) is the preferred manner of treatment upon identification of unique archeological resources (Public Resources Code §§21083.2(b)). If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. All tribal cultural resources shall be returned to the consulting tribe. Any historic archaeological material that is not Native American in origin shall be curated at a public, non-profit institution with a research interest in the materials,

such as the San Diego Archeological Center. Acceptance and curation of the historic archeological materials will be at the discretion of the institution. If no institution accepts the archaeological material, they shall be offered to the consulting tribe or the Del Mar Historical Society for educational purposes.

### **Mitigation Measure CUL-3**

Applications for future development where the City has determined a potential for impacts to archeological resources, shall be required to comply with the following mitigation framework:

Prior to the issuance of any permit for future development located on a previously undisturbed site, the applicant shall retain a qualified archaeologist to conduct an archaeological survey to evaluate the presence of cultural resources and the need for project impact mitigation by preservation, relocation, or other methods. An archaeological resource report shall be submitted by the applicant to the City and shall include the methods used to determine the presence or absence of archaeological resources, identify potential impacts from the proposed project, and evaluate the significance of any archaeological resources identified. If there are potentially significant impacts to an identified archaeological/cultural resource, the report shall also recommend appropriate mitigation required by the applicant to reduce impacts to below a level of significance. to reduce the impacts to below a level of significance.

## **4.6 Energy**

Would the project:

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**EXPLANATIONS:****a. Less than Significant Impact**Construction

As proposed, project construction would be limited to site improvements for utility lines, road improvements to La Atalaya Way, and relocation of an existing storage shed. However, the analysis of impacts also considers the future buildout of six single-family residences to provide a full buildout scenario assessment of potential impacts. Construction of any new housing development would be required to follow the City's Construction and Demolition Waste (C&D) Recycling Ordinance (DMMC Chapter 23.70). Transportation energy use during short-term construction would come from the transport and use of equipment and employee vehicles that would use diesel fuel and/or gasoline. The use of energy resources by these vehicles would be temporary. Impacts related to transportation energy use during construction would be temporary and would not require expanded energy supplies or the construction of new infrastructure. Impacts would be less than significant.

Operation

Operational emissions associated with the project include mobile and stationary sources. According to the project's traffic report, future construction of six single-family residences would generate a maximum of 60 daily trips (Chen Ryan Associates 2020). Additionally, area and energy source emissions would result from the use of natural gas and consumer products. Future construction of single-family residences would comply with current Energy Code and CALGreen standards, which require energy-efficient measures including solar ready roofs, increased lighting efficiency, and the installation of Energy Star appliances. Prior to the issuance of building permits, future development of single-family residences must demonstrate compliance with the current Energy Code through submission and approval of a Title 24 Compliance Report to the local building permit review authority and the California Energy Commission (CEC). Additionally, future development would be required to implement the Del Mar Solar Energy Ordinance (see Section 4.5.2.2) requiring all conventional heating, ventilation, and air conditioning systems to be provided with an active, passive, or hybrid solar system. Thus, impacts would be less than significant.

**b. No Impact**

On June 6, 2016, the City adopted a Climate Action Plan (CAP) which sets targets for reducing greenhouse gas (GHG) emissions by 2020 and 2035 (City of Del Mar 2016). The CAP's goal for 2035 is to reduce GHG emissions to at least 50 percent below Del Mar's baseline 2012 values, and to continue further reductions to meet the state goal of 80 percent reduction below statewide 1990 values by 2050. Recognizing that energy use is a significant contributor to the City's GHG emissions (36 percent of the 2012 baseline), the CAP has a goal to achieve 100 percent renewable energy by 2035 (City of Del Mar Climate Action Plan 2016, page S-1).

As of October 2019, the Del Mar City Council adopted an ordinance to implement a Community Choice Energy (CCE) Program, with a planned launch date of 2021. The CCE Program is in partnership with the cities of Solana Beach and Carlsbad and is operated through a Joint Powers Authority (JPA), specifically, the Clean Energy Alliance (CEA). Once the CEA begins, residents and businesses will automatically be enrolled into a power supply portfolio with greater than or equal to 50 percent renewable power sources. Residents and businesses will have the choice to opt-out entirely or opt into 100 percent renewable power sources. CEA plans to offer 100 percent renewable power sources to all customers by 2035.

As proposed, project construction would be limited to site improvements for utility lines, road improvements to La Atalaya Way, and relocation of an existing storage shed. However, the analysis of impacts considers the hypothetical construction of six single-family residences to provide a full buildout scenario assessment of potential impacts. City energy-related strategies would not directly apply to the initial short-term construction emissions from private road and utility line improvements; however, future residential development on proposed lots 1, 2, 5, 6, 7, and 8 would be required to comply with current Energy Code and CALGreen standards, which require energy-efficient measures including solar ready roofs, increased lighting efficiency, and the installation of Energy Star appliances. Prior to the issuance of building permits, future development of residences must demonstrate compliance with the current Energy Code through submission and approval of a Title 24 Compliance Report to the local building permit review authority and the CEC. Additionally, future development would be required to implement the Del Mar Solar Energy Ordinance requiring all conventional heating, ventilation, and air conditioning systems to be provided with an active, passive, or hybrid solar system. The City's CCE Program is structured to offer competitive rates to residents and to reduce greenhouse gas emissions. Once the CEA begins in 2021, residents and businesses will automatically be enrolled into a power supply portfolio with greater than or equal to 50 percent renewable power sources. Residents and businesses will have the choice to opt out entirely or opt into 100 percent renewable power sources. CEA plans to offer 100 percent renewable power sources to all customers by 2035. Thus, through regulatory compliance it is ensured that the project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Impacts would be less than significant.

## 4.7 Geology and Soils

Would the project:

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>



Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Directly or indirectly destroy a unique paleontological resource or site or unique geological feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**EXPLANATIONS:**

This section describes potential impacts related to geology and soils and is based on a Preliminary Geotechnical and Infiltration Testing Report prepared for the project by Geotechnical Exploration, Inc. dated June 18, 2018. The report is included as Attachment 5 to this IS/MND.

**a.i and a.ii. Less than Significant**

Ground surface rupture is unlikely to occur due to the absence of any known active or potentially active faults on-site. The project site is subject to seismic activity from the San Andreas fault to the east and the parallel fault systems of the Elsinore fault to the east, as well as the offshore Rose Canyon and Coronado Bank faults.

Future residential development on proposed lots 1, 2, 5, 6, 7 and 8 would be required to demonstrate conformance with seismic design guidelines and requirements contained in the City's Uniform Codes for Construction Building Code (DMMC Chapter 23.12) and requirements would be confirmed through the design review and building plan review processes (DMMC Chapter 23.08). The Construction Building Code contains design and construction regulations pertaining to seismic safety for buildings, which covers issues such as ground motion, soil classifications, redundancy, drift, and deformation compatibility. The City's Grading Ordinance requires that a grading permit be obtained prior to grading, including a geotechnical investigation, which would include conclusions and recommendations addressing grading procedures, soil stabilization during and post-construction, foundation design, and slope stability. The report would also include recommendations for corrective measures relative to other potential site geotechnical issues such as temporary shoring, interim slopes during construction, expansive soils, liquefaction, collapsible soils, consolidation, undocumented fill, compressible material, soil erosion, seepage, and landslides. Thus, impacts associated with a strong seismic event or seismic ground shaking would be less than significant.

**a.iii and a.iv. Less than Significant Impact**

As discussed in the Preliminary Geotechnical and Infiltration Testing Report, the project site contains medium dense to dense natural ground material and lacks shallow static groundwater surface under the site. Therefore, the project site is not considered at risk for liquefaction of foundation materials due to seismic shaking. Additionally, the project site does not contain deep-seated ancient landslides. Future residential development on proposed lots 1, 2, 5, 6, 7, and 8 would be required to adhere to the DMMC Chapter 11.30, which requires soil erosion best management practices (BMPs). Compliance with City regulations would protect against soil erosion or the potential for landslides. Thus, impacts would be less than significant.

**b. Less than Significant Impact**

Initial project construction would be limited to site improvements for utility lines, the existing private road, and an existing storage shed to be relocated. Therefore substantial erosion or loss of topsoil is not expected to occur. Future residential development on proposed lots 1, 2, 5, 6, 7, and 8 would be required to the DMMC Chapter 11.30, which requires soil erosion BMPs. Compliance with City regulations would protect against soil erosion or the loss of topsoil. Thus, impacts would be less than significant.

**c. Less than Significant Impact**

The project site contains medium dense to dense natural ground material and lacks shallow static groundwater surface under the site. Therefore, the project site is not considered at risk for liquefaction of foundation materials due to seismic shaking. Additionally, the project site does not contain deep-seated ancient landslides. Future residential development on proposed lots 1, 2, 5, 6, 7, and 8 would be required to adhere to the DMMC Chapter 11.30, which requires soil erosion best management practices (BMPs). Compliance with City regulations would protect against soil erosion or the potential for landslides. Thus, impacts would be less than significant.

**d. No Impact**

The project site contains medium dense to dense natural ground material and lacks shallow static groundwater surface under the site. These soils have a low expansion potential. Thus, no impacts related to soil expansion would occur.

**e. No Impact**

The project does not propose the use of septic tanks or alternative wastewater disposal systems. Future residential development on proposed lots 1, 2, 5, 6, 7, and 8 would connect to existing water and sewer lines. No impact would occur.

**f. Potentially Significant Unless Mitigation Incorporated**

Impacts to paleontological resources typically occur during grading activities associated with project construction on previously undisturbed land, or during development where much deeper grading in native soil is proposed. The proposed minor construction would not include grading activities. Potential future impacts to paleontological resources would be analyzed on a lot-by-lot basis as each development is individually proposed. Mitigation measure GEO-1 would reduce potential future impacts related to paleontological resources to a level less than significant.

**Mitigation Measures****Mitigation Measure GEO-1**

For future development identified as having high paleontological sensitivity, the applicant shall:

- a. Retain a Qualified Project Paleontologist. Prior to ground disturbing activities, the Applicant shall retain a qualified Project Paleontologist, defined as a paleontologist who meets the Society of Vertebrate Paleontology standards for Qualified Professional Paleontologist, to direct all mitigation measures related to paleontological resources.
- b. Prepare a Paleontological Monitoring and Compliance Program. After design of the development has been finalized to determine the precise extent and location of ground disturbing activities, and prior to ground disturbing activities, the Project Paleontologist shall prepare a Paleontological Monitoring and Compliance Program to be implemented during the ground disturbing activities. The program shall be prepared in accordance with the standards set forth by current Society of Vertebrate Paleontology guidelines (2010). Prior to ground disturbing activities, the program shall be provided to the City of Del Mar.

Ground disturbing activities where paleontological sensitivity has been identified shall be monitored full-time by a qualified paleontological monitor during initial ground disturbing activities.

The program shall be supervised by the Project Paleontologist in coordination with the City. The duration and timing of the monitoring shall be determined by the Project Paleontologist. If the Project Paleontologist determines that full-time monitoring is no longer warranted, he or she may recommend to the City that monitoring be reduced to periodic spot-checking or cease entirely. Monitoring shall be reinstated, if reduction or suspension would need to be reconsidered by the Project Paleontologist.

The program shall outline the procedures for construction staff Worker Environmental Awareness Program (WEAP) training, paleontological monitoring extent and duration, salvage and preparation of fossils, the final mitigation and monitoring report, and paleontological staff qualifications.

- c. Paleontological WEAP. Prior to ground disturbing activities, the Project Paleontologist or his or her designee shall conduct construction personnel training regarding the appearance of fossils and the procedures for notifying paleontological staff should fossils be discovered by construction staff. The WEAP shall be presented at a preconstruction meeting that a qualified paleontologist shall attend.
- d. Fossil Discovery. In the event of a fossil discovery by construction personnel, all work in the find's immediate vicinity shall cease, and the City of Del Mar and a qualified paleontologist shall be contacted to evaluate the find before restarting work in the area. If ground disturbing activities bring potentially sensitive geologic deposits to the surface in areas considered to have an undetermined paleontological sensitivity, these areas shall be inspected and further assessed. If it is determined that the fossil(s) is (are) scientifically significant, the qualified paleontologist shall complete the following conditions:
  - i. Salvage of Fossils. If fossils are discovered, the Project Paleontologist or paleontological monitor shall recover them. Typically, fossils can be safely salvaged quickly by a single paleontologist and not disrupt construction activity. In some cases, larger fossils (such as complete skeletons or large mammal fossils) require more extensive excavation and longer salvage periods. In this case, the paleontologist shall have the authority to temporarily direct, divert, or halt construction activity to ensure that the fossil(s) can be removed in a safe and timely manner.
  - ii. Preparation and Curation of Recovered Fossils. Once salvaged, the City shall ensure that significant fossils are identified to the lowest possible taxonomic level, prepared to a curation-ready condition, and curated in a scientific institution with a permanent paleontological collection (such as the San Diego County Natural History Museum), along with all pertinent field notes, photos, data, and maps. Fossils of undetermined significance at the time of collection may also warrant curation at the discretion of the Project Paleontologist. Field collection and preparation of fossil specimens shall be performed by the Project Paleontologist with further preparation as needed by an accredited museum repository institution at the time of curation.
- e. Final Paleontological Monitoring and Compliance Report. Upon completion of ground disturbing activities (and curation of fossils, if necessary) the Project Paleontologist shall prepare a Final Paleontological Monitoring and Compliance Report outlining the results of the Paleontological Monitoring and Compliance Program. The report shall be provided to the City of Del Mar and shall include discussion of the location, duration, and methods of the monitoring, stratigraphic sections, any recovered fossils, and the scientific significance of those fossils, and where fossils were curated.

## 4.8 Greenhouse Gas Emissions

Would the project:

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### EXPLANATIONS:

This section describes potential impacts related to greenhouse gas emissions and is based on a Greenhouse Gas Analysis prepared for the project by RECON Environmental, Inc. dated July 6, 2020. The report is included as Attachment 6 to this IS/MND.

The CEQA Guidelines require lead agencies to adopt GHG thresholds of significance. When adopting these thresholds, a lead agency would be allowed to consider (1) thresholds of significance adopted or recommended by other public agencies, (2) thresholds recommended by experts, provided that the thresholds are supported by substantial evidence, and/or (3) develop their own significance threshold.

The City has not adopted a GHG threshold of significance for general use as part of its environmental review process. Guidance from the California Air Pollution Control Officers Association (CAPCOA) report CEQA & Climate Change, dated January 2008, identifies several potential approaches for assessing a project's GHG emissions (CAPCOA 2008). Among these approaches, the guidance introduces the concept of establishing thresholds based on GHG emission market capture rates. Following this approach, a lead agency defines an acceptable market capture rate and identifies the corresponding emissions level.

State GHG emissions reduction targets proposed and/or codified by Executive Order (EO) S-3-05, Assembly Bill (AB) 32, EO B-30-15, and Senate Bill (SB) 32 include achieving 1990 emission levels by 2020; 40 percent below 1990 levels by 2030; and 80 percent below 1990 levels by 2050<sup>1</sup>. Note that California had achieved the 2020 goal by 2017. The most

<sup>1</sup> Whereas the 2020 and 2030 reduction targets have been codified by AB 32 and SB 32, respectively, the 2050 reduction targets proposed by EO S-3-05 have not yet been codified.

ambitious reduction target, 80 percent below 1990 levels, corresponds to a 90 percent reduction in statewide BAU emissions. Thus, the guidance identifies project-level thresholds that would correspond to a 90 percent market capture rate, annual emission of 900 metric tons (MT) of carbon dioxide equivalent (CO<sub>2</sub>E). Following rationale presented in the CAPCOA Guidance, the aggregate emissions from all projects with individual annual emissions that are equal to or less than 900 MT CO<sub>2</sub>E would not impede achievement of the state GHG emissions reduction targets codified by SB 32 (2016), and impacts under CEQA would, therefore, be less than cumulatively considerable.

As this 900 MT CO<sub>2</sub>E screening level corresponds to the most ambitious state reduction target, 80 percent below 1990 levels by 2050, and does not account for emission reductions achieved by federal, state, and local reduction measures implemented between 2020 and 2050, it is highly conservative. Projects with annual emissions that exceed 900 MT CO<sub>2</sub>E would warrant more detailed conformity analysis for 2030 targets.

#### **a. Less than Significant Impact**

As proposed, project construction would be limited to site improvements for utility lines, road improvements to La Atalaya Way, and relocation of an existing storage shed. However, the analysis of impacts considers the hypothetical construction of six single-family residences to provide a full buildout scenario assessment of potential impacts. The primary sources of direct and indirect GHG emissions have been calculated for the proposed construction of private road and utility line improvements. Table 7 summarizes the GHG emissions that would directly result from project implementation.

<b>Table 7 Direct Project GHG Emissions (MT CO<sub>2</sub>E per Year)</b>	
<b>Emission Source</b>	<b>GHG Emissions</b>
Total Private Road and Utility Line Construction	20
Construction Emissions Amortized Over 30 Years	<1

As shown, construction of the private road and utility line improvements would result in a total of approximately 20 MT CO<sub>2</sub>E, which would be less than 1 MT CO<sub>2</sub>E when amortized over 30 years. These emissions would be minimal, and would cease once construction activities are complete.

GHG emissions were also calculated for the potential construction and operation of six single-family residences. The results are summarized in Table 8.

<b>Table 8</b> <b>GHG Emissions – Six Single-family Residences</b> <b>(MT CO<sub>2</sub>E per Year)</b>	
Emission Source	GHG Emissions
Vehicles	58
Energy Use	17
Area Sources	15
Water Use	2
Solid Waste Disposal	4
Construction (Amortized Over 30 Years)	12
<b>TOTAL</b>	<b>107</b>
NOTE: Totals may vary due to independent rounding.	

As shown, the potential construction and operation of six single-family residences would result in approximately 107 MT CO<sub>2</sub>E per year. Annual emissions would be well less than 900 MT CO<sub>2</sub>E per year. As discussed in Section 4.0, CAPCOA guidance, the annual 900 MT CO<sub>2</sub>E screening level corresponds to the most ambitious state reduction target and is highly conservative. Projects with individual annual emissions that are equal to or less than 900 MT CO<sub>2</sub>E would not impede achievement of the state GHG emissions reduction targets codified by SB 32 (2016), and impacts under CEQA would, therefore, be less than cumulatively considerable.

## **b. No Impact**

The City's CAP identifies strategies to meet the targets, formulates a plan for implementation, and discusses ways the City needs to adapt to the effects of climate change already occurring or anticipated to occur, such as sea level rise and water supply shortages. The CAP's strategies are categorized into the following key focus areas: energy and buildings, water and waste, transportation, and urban tree planting. Many of the measures included in the CAP are intended for the City to implement. The CAP's measures generally do not align with project-specific GHG reductions, but rather community-wide or City actions. A summary of the City's goals and a discussion of how these are supported by the project are provided below. The City's CAP is not a "qualified CAP" as it has not gone through CEQA review; therefore, the proposed project's consistency is provided for informational purposes only and no impact would occur.

### ***Energy and Buildings***

The CAP contains the following goals related to energy and buildings:

- E1—Efficiency and Renewables Education: Develop and implement targeted educational and marketing strategies to encourage and build awareness of efficiency and renewable energy programs, products, and practices.
- E2—Energy Benchmarking: Promote tools like ENERGY STAR Portfolio Manager for residential and commercial property owners to build awareness of their energy use, GHG footprint, and options for improving efficiency.
- E3—Streamlining Approvals: Facilitate the permit process and/or adopt progressive fee schedules for projects that meet a minimum standard for incorporating efficiency

or renewable energy components—going beyond state requirements for solar streamlining.

- E4—Financing Tools for Efficiency and Renewables: Support implementation of Property Assessed Clean Energy (PACE) programs in Del Mar and continue to assess other efficiency and renewables financing tools for possible use in the community.
- E5—Community Choice Aggregation (CCA): Support the creation of and join a regional CCA providing 100 percent renewable energy by 2035.
- E6—Municipal Renewable Energy: Increase the City's use of renewable energy.

Emissions associated with the project would be limited to short-term construction emissions from private road and utility line improvements. Future construction of single-family residences would comply with current Energy Code and CALGreen standards, which require energy-efficient measures including solar ready roofs, increased lighting efficiency, and the installation of Energy Star appliances. Prior to the issuance of building permits, future development of single-family residences must demonstrate compliance with the current Energy Code through submission and approval of a Title 24 Compliance Report to the local building permit review authority and the CEC. Additionally, future development would be required to implement the Del Mar Solar Energy Ordinance (see Section 4.5.2.2) requiring all conventional heating, ventilation, and air conditioning systems to be provided with an active, passive, or hybrid solar system. The project would not conflict with implementation of City efforts to reduce GHG emissions associated with energy and buildings.

### ***Water and Waste***

The CAP contains the following goals related to water and waste:

- W1—Water Waste Enforcement: Complement educational strategies with increased enforcement against water waste.
- W2—Update Landscape Water Conservation Ordinance.
- W3—Finance Tools for Efficiency: Support implementation of PACE programs in Del Mar and continue to assess other efficiency financing tools for possible use in the community.
- W4—Implement Pool Cover Program.
- W5—Develop a Zero Waste Plan: Increase waste reduction through reuse, recycling, composting, and other technologies until the goal of zero waste is achieved.
- W6—Sponsor Zero Waste Events: Require zero waste at all City-sponsored events by 2017.
- W7—Construction & Demolition (C&D) Recycling Standards: Reduce construction waste consigned to the landfills.



- W8—Organics Diversion Program: Divert organic waste from landfills.
- W9—Methane Capture for Landfills: Encourage increased methane capture for landfills serving Del Mar.
- W10—Methane Capture for Wastewater Treatment Plants: Encourage increased methane capture for wastewater treatment plants serving Del Mar.

City strategies to implement these goals include implementation of a Water and Energy Conservation Ordinance (WECO), implementation of Purchase of Agricultural Easements programs, developing public education programs, promoting water efficiency rebate programs, and following the City's C&D Recycling Ordinance (DMMC Chapter 23.70). The project itself would not include any water consumption. During construction, the project would divert 65 percent of its construction waste, per CALGreen requirements. Future development would be required to reduce indoor water consumption by 20 percent and would implement outdoor water use reduction measures outlined in the Model Water Efficient Landscape Ordinance, and would implement a recycling program as required by the DMMC and AB 341 to reduce, recycle, or compost 75 percent of the solid waste generated. The project would not conflict with implementation of City efforts to reduce GHG emissions associated with water and waste.

### ***Transportation***

The CAP contains the following goals related to transportation:

- T1—Improve Transit Service: Ensure reliable, comfortable, and safe transit options for Del Mar residents, employees, and visitors.
- T2—Improve Transit Efficiency: Provide enhanced bus service in Del Mar by 2020.
- T3—Retrofit Major Corridors to be “Complete Streets”: Consider every transportation mode and user when designing streets, and incorporate multimodal design principles in all projects.
- T4—Expand Alternative Fuel Infrastructure: Advocate and collaborate with neighboring jurisdictions for the installation of at least one fueling station for all major alternative fuels within five miles of Del Mar by 2020.
- T5—Preferential Parking for Clean Vehicles: Set aside convenient parking spaces for high efficiency and clean vehicles, including motorcycles and scooters.
- T6—Install Roundabouts.
- T7—Support Regional Transportation Demand Management.

There are a number of City strategies to implement these goals including coordinating with SANDAG and the San Diego Metropolitan Transit System to increase mass transit ridership, exploring adoption of a “Complete Streets” policy and bicycle strategy, exploring development of a pedestrian master plan, promoting the use of electric and alternative fuel vehicles, and constructing roundabouts, among other strategies. The project itself would not

include any operational mobile source of emissions. The development of six single-family residences would generate 60 daily trips; however, these trips could occur with or without implementation of the project. The project would not conflict with implementation of City efforts to reduce GHG emissions associated with vehicle use.

### ***Urban Tree Planting***

The CAP contains the following goal related to urban tree planting:

- Achieve 15 percent urban canopy cover by 2020 for 500 acres of land in Del Mar, increasing to 30 percent by 2035

The strategy to achieve this goal would be for the City to implement an urban tree planting program. This program would reduce GHG emissions by sequestering CO<sub>2</sub>. Trees planted near pavement can reduce the surface temperatures of streets and parking lots, and trees planted strategically near windows or roofs of buildings can effectively reduce interior temperatures, thereby reducing energy used for cooling. The project would not interfere with City efforts towards achieving this goal.

## **4.9 Hazards and Hazardous Materials**

Would the project:

<b>Issue</b>	<b>Potentially Significant Impact</b>	<b>Potentially Significant Unless Mitigation Incorporated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
a. Create a significant hazard to the public or the environment through routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
d. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. For a project located 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, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**EXPLANATIONS:****a–b. Less than Significant Impact**

As proposed, project construction would be limited to site improvements for utility lines, the existing private road, and an existing storage shed to be relocated. During these construction activities, materials would be managed and used in accordance with all applicable federal, state, and local laws and regulations, and would not represent a significant hazard to the public or environment. Additionally, future development of single-family residences on the proposed lots 1, 2, 5, 6, 7, and 8 would not involve ongoing or routine use of substantial quantities of hazardous materials during operations (occupancy of future housing). Only small quantities of hazardous materials would be anticipated including cleaning solvents, fertilizers, pesticides, and other materials used in regular maintenance. Therefore, potential impacts from the routine transport, use, or disposal of hazardous materials would be less than significant given conformance to existing regulations.

**c. No Impact**

As proposed, project construction would be limited to site improvements for utility lines, road improvements to La Atalaya Way, and relocation of an existing storage shed, followed by future construction of six single-family residences. No schools are located within 0.25 mile of the project site. The closest schools are the Winston School which is located approximately 1.4 miles southwest of the project site and Del Mar Hills Elementary which is located approximately 2 miles southwest from the project site. Therefore, the project would not emit hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school and no impact would occur.

**d. No Impact**

The Hazardous Waste and Substances Sites (Cortese) List is a planning document that provides information about the location of hazardous materials release sites in the state. Government Code Section 65962.5 requires the California Environmental Protection Agency to develop at least annually an updated Cortese List. The California Department of Toxic Substances Control (DTSC) is responsible for a portion of the information contained in the Cortese List. Other state and local government agencies are required to provide additional information for the Cortese List. A review of the Cortese List (EnvirStor 2020) indicated that no hazardous materials locations have been recorded within 0.5 mile of the project site. Therefore, the project is not located on a site or near a site included on a list of hazardous materials sites that would create a significant hazard, and no impacts would occur.

**e-f. No Impact**

The project site is not located within an airport land use compatibility plan area; or within two miles of a public or public use airport, or a private airstrip. The project would not interfere with emergency response plans or operations near the project site. No impact would occur.

**g. Less than Significant Impact**

The California Department of Forestry and Fire Protection (CAL FIRE) has mapped areas of significant fire hazards in San Diego County into different Fire Hazard Severity Zones (FHSZ) based upon fuels, terrain, weather, and other relevant factors. Portions of the project site are located in the Very High FHSZ within the local responsibility area (CAL FIRE 2009). Additionally, the project area is mapped within the Wildland Urban Interface (WUI) Zone. Wildfires may originate in undeveloped areas and spread to developed or urban areas where landscape and structures are not designed and maintained to be fire-resistant. Areas where residential developments are built or located among lands prone to wildfires are characterized as WUI areas. In general, a WUI is an area where structures and other human developments meet or intermingle with wildland vegetative fuels, including shrubs, trees and grasses.

As proposed, project construction would be limited to site improvements for utility lines, the existing private road, and an existing storage shed to be relocated. Future development

would be subject to discretionary permits and required to adhere to mandatory fire prevention requirements and regulations of DMMC Chapter 10.04 (Fire Prevention, which incorporates the 2019 California Fire Code) and DMMC Section 10.04.070-503 (Fire Apparatus Access Roads). Adherence to state and local fire codes are intended to reduce risks in conjunction with future development related to wildland fire. As a result, impacts associated with wildland fires would be less than significant.

## 4.10 Hydrology and Water Quality

Would the project:

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner, which would:				
i. result in substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
iv. impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**EXPLANATIONS:**

This section describes potential impacts related to hydrology and water quality and is based on a Storm Water Management Plan (SWMP) prepared for the project by Sowards & Brown Engineering, Inc. dated September 3, 2019. The report is included as Attachment 7 to this IS/MND.

**a. Less than Significant Impact**

The SWMP complies with the priority development project requirements of the City of Del Mar BMP Design Manual, which is a design manual for compliance with the City of Del Mar and the MS4 Permit (California Regional Water Quality Control Board San Diego Region Order No. R9-2015-0100) requirements for storm water management.

Project construction is subject to the City's Stormwater Management, and Discharge Control Ordinance (DMMC Chapter 11.30), which requires implementation and maintenance of minimum BMPs outlined in the City's Stormwater Standard Manuals. The City would require installation of BMPs as outlined in the SWMP to prevent erosion, runoff, and pollution into storm drains. Implementation of BMPs would minimize potential impacts to water quality. With implementation of the applicable regulatory framework, the project would not violate any water quality standards or waste discharge requirements. Therefore, impacts related to water quality and runoff would be less than significant.

**b. No Impact**

The project would not withdraw groundwater or result in discharge of groundwater from the site into the existing groundwater table. Therefore, no impact related to groundwater supplies would occur.

**c.i. – c.iv. Less than Significant Impact**

The project site is comprised of vegetated steep slopes that descend from a centrally located ridge running northwesterly. The site drains from the ridge to the east, north, and west.



Drainage within the site is comprised of 11 drainage basins, each with different drainage patterns.

As discussed in the SWMP, the majority of the drainage to the east and north of the ridge (basins 1, 5, 6, 7, 8, 9, and 10) is captured and conveyed in private drainage systems that comeingle with roadway drainage at two drainage inlets along the westerly side of San Dieguito Drive. Each of the inlets is connected to a drainage pipe that runs under San Dieguito Drive and outlets into the San Dieguito Lagoon. The project proposes private storm drain inlets which would be utilized to collect runoff from the lengthened portion of the roadway (La Atalaya Way) and divert the runoff to a biofiltration basin for treatment. Runoff from the replaced portion of the roadway would be collected in a swale and routed to a biofiltration basin for treatment. Runoff from the relocated shed would also flow on the surface to a biofiltration basin for treatment.

Approximately 98 percent of the property would remain unchanged as a result of the project. The proposed changes would be minimally invasive and existing drainage patterns would not be altered.

Since the runoff within the area of site improvements to utility lines, and widening and improving the existing private road is conveyed off-site within storm drain pipes to the two drainage inlets along San Dieguito Drive, then conveyed within storm drain pipes to the San Dieguito Lagoon, the portion of the site under development is exempt from hydromodification. As shown in Figure 4, a portion of proposed lots 5, 6, 7, and 8 are within the 100-year floodplain of the San Dieguito Lagoon, but not within the development areas. There is no potential flooding impact to downstream properties due to increased peak flow within the portion of the site subject to the proposed improvements. Thus, the project would not substantially alter the existing drainage pattern of the project site, nor would it alter the course of a river in a manner that would result in substantial erosion, siltation, or flooding on- or off-site. Compliance with the City's storm water regulations would maintain runoff rates. Furthermore, the project site does not contain any stream, river, or water course. Thus, impacts would be less than significant.

#### **d. Less than Significant Impact**

As stated in the Preliminary Geotechnical and Infiltration Testing Report, the project site has an elevation of 15 to over 250 feet above mean sea level. Additionally, the project site is not located within a possible inundation zone of the California Geologic Survey's "Tsunami Inundation Map for Emergency Planning, Del Mar Quadrangle" (2009). No impacts related to tsunamis would occur.

There is no flood risk due to dam or levee failure, and the potential for seiche and mudflow risk would be very low. As shown in Figure 4, a portion of proposed lots 5, 6, 7, and 8 are within the 100-year floodplain of the San Dieguito Lagoon, but not within the development areas. Additionally, the soils within the project area are not prone to mudslides. The City is located downstream from Lake Hodges Dam, which is approximately 12 miles east of the City. Since no development would be located within the 100-year floodplain, impacts from the Lake Hodges Dam would be less than significant.

**e. Less than Significant Impact**

The City's Best Management Practices Design Manual (City 2016) addresses on-site post-construction storm water requirements and provides procedures to plan, design, and select storm water management best practices to meet the performance standards of the MS4 Permit. Best practices include reducing water use, employing erosion-resistant surfaces, diverting water around the construction site, keeping vegetation, protecting channels, and not excavating or grading during wet weather. The manual provides guidelines for preparation and review of storm water management programs.

Dischargers whose projects disturb one or more acres of soil or whose projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to comply with the General Permit for Discharges of Stormwater Associated with Construction Activity (Construction General Permit Order 2009-0009-DWQ). The Construction General Permit requires the development of a Stormwater Pollution Prevention Plan (SWPPP) by a certified Qualified SWPPP Developer. A SWMP was prepared for the proposed project. Conditions of approval have been issued by the City's Engineering Consultant which, in addition to the SWPPP, requires additional studies including a drainage plan, geotechnical report, and BMP details prior to construction of the private road.

Future development of single-family residences on the proposed lots 1, 2, 5, 6, 7, and 8 would be required to adhere to all federal, state, and local requirements for avoiding and minimizing construction and operations impacts to prevent conflicts with or obstruction of implementation of a water quality control plan or sustainable groundwater management plan, including the Basin Plan and the City's Jurisdictional Runoff Management Plan. Further, future development would not prevent the City's Clean Water Program staff from ensuring that MS4 Permit and Basin Plan requirements are met through implementing programs such as education/training, water quality monitoring and assessment, inspections, and enforcement activities.

Example City activities implemented to address potential pollution sources include:

- Focused inspections of construction sites
- Response to public or City staff observations of potential polluting activities
- Observations of storm drains to identify pollutant sources
- Investigations of pollutant sources
- Cleaning of the storm drain system
- Street sweeping
- Diverting non-stormwater discharges to the sanitary sewer system.

As a result, future development would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Therefore, impacts would be less than significant.

## 4.11 Land Use and Planning

Would the project:

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### EXPLANATIONS:

#### a. No Impact

The project would not physically divide an established community. As discussed in Section 3.0, the project is an approximately 18-acre property that is currently comprised of eight separate lots. Two of the existing lots, lots 3 and 4, have been previously developed with a primary residence at 690 Serpentine Drive and a guest house at 2100 Gatun Street, respectively. Future housing development would occur in areas currently zoned for residential use and the addition of six single-family residences would be a consistent land use that would not physically divide the community. The project would not displace the owners of the existing home on-site. Therefore, no impact would occur from the project.

#### b. No Impact

As discussed in Section 3.0, the project proposes to reconfigure eight existing lots into eight new lots identified as proposed lots 1, 2, 3, 4, 5, 6, 7, and 8 (see Figure 4) through a series of lot line adjustments. The proposed lot line adjustments are in compliance with subdivision requirements of the DMMC, with exception to proposed lot 1 which is proposed to maintain an existing non-conforming minimum street frontage. The proposed lot data can be found in Section 3.0, Table 1.

Eventually, as vacant lots are brought forward for development of single-family residences on the proposed lots 1, 2, 5, 6, 7, and 8, those detailed future plans would be further evaluated by the City for their potential impacts and compliance of those future plans with the applicable regulations. Furthermore, the City does not have an approved local, regional, or state habitat conservation plan or natural community conservation plan. Thus, the project would not conflict with any applicable land use plan, policy, or regulation, and no impacts would occur.

## 4.12 Mineral Resources

Would the project:

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### EXPLANATIONS:

#### a-b. No Impact

The California Geological Survey classifies the regional significance of mineral resources in accordance with the California Surface Mining and Reclamation Act of 1975 and designates lands containing significant aggregate resources. Mineral resource zones (MRZ) have been designated to indicate the significance of mineral deposits. As identified in the California Department of Conservation Mineral Lands Classification Map (1996), the project site is classified as MRZ-3, which is defined as areas that contain known mineral deposits that could qualify as mineral resources. The project proposes to reconfigure eight existing lots into eight new lots identified as proposed lots 1, 2, 3, 4, 5, 6, 7, and 8 through a series of lot line adjustments. Additionally, the project proposes site improvements for the existing private road, utility lines, and an existing storage shed to be relocated. Thus, the project would not impact any known mineral resources or result in the loss of availability of any locally important resource recovery site. No impacts to mineral resources would occur.

## 4.13 Noise

Would the project:

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. 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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Generation of excessive ground borne vibration or ground borne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. For a project 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 area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### EXPLANATIONS:

#### a. Potentially Significant Unless Mitigation Incorporated

Noise is defined as sound that is loud, unpleasant, unexpected, or undesired and, therefore, may cause general annoyance, interference with speech communication, sleep disturbance, and, in the extreme, hearing impairment. Decibels (dB) are the standard unit of measurement of the sound pressure generated by noise sources and are measured on a logarithmic scale that quantifies sound intensity. A doubling of the energy of a noise source, increases the noise level by 3 dB; and a halving of the noise energy would result in a 3 dB decrease in noise.

The human ear is not equally sensitive to all frequencies within the sound spectrum. To accommodate this phenomenon, the A-weighted scale, which approximates the frequency response of the average young ear when listening to most ordinary everyday sounds, was devised. Noise levels using A-weighted measurements are written as dB(A). It is widely accepted that the average healthy ear can barely perceive changes of 3 dB(A) (increase or decrease) and that a change of 5 dB(A) is readily perceptible. An increase of 10 dB(A) is

perceived as twice as loud, and a decrease of 10 dB(A) is perceived as half as loud (Caltrans 2013).

Although dB(A) may adequately indicate the level of environmental noise at any instant in time, community noise levels vary continuously. Most environmental noise includes a conglomeration of frequencies from distant sources that create a relatively steady background noise in which no particular source is identifiable. Average noise levels over a period of minutes or hours are usually expressed as dB(A)  $L_{eq}$ , which typically assumes a 1-hour average noise level and is used as such in this report. The maximum noise level ( $L_{max}$ ) is the highest sound level occurring during a specific period.

### Construction Noise Levels

Construction-related noise is regulated within the City by the Noise Ordinance (DMMC Chapter 9.20), which limits construction noise to the hours of 7:00 a.m. to 7:00 p.m. Monday through Friday and 9:00 a.m. to 7:00 p.m. on Saturdays. Construction noise is prohibited on Sundays and City-designated holidays. DMMC Section 9.20.050(D) requires that construction activity shall not cause an hourly average sound level greater than 75 dB on property zones or used for residential purposes.

Project construction noise would be generated by diesel engine-driven construction equipment used for site preparation and grading, building construction, loading, unloading, and placing materials and paving. Diesel engine-driven trucks also would bring materials to the site and remove the soils from excavation. In general, construction would typically involve the following construction sequences: (1) site preparation and/or demolition; (2) grading and utilities construction; (3) building construction; (4) paving; and (5) architectural coatings. Typical construction equipment would include backhoes, excavators, graders, loaders, compactors, cranes, trucks, pavers, pneumatic tools, generator sets, and air compressors. Construction equipment with a diesel engine typically generates maximum noise levels from 70 to 95 dB(A)  $L_{eq}$  at a distance of 50 feet (Federal Highway Administration [FHWA] 2006). Table 9 summarizes typical construction equipment noise levels.



Table 9 Typical Construction Equipment Noise Levels			
Equipment	Maximum Noise Level at 50 Feet [dB(A) $L_{eq}$ ] <sup>1</sup>	Typical Duty Cycle <sup>2</sup>	Average Noise Level at 50 Feet [dB(A) $L_{eq}$ ] <sup>3</sup>
Auger Drill Rig	85	20%	78
Backhoe	80	40%	76
Blasting	94	1%	74
Chain Saw	85	20%	78
Compactor (ground)	80	20%	73
Compressor (air)	80	40%	76
Concrete Mixer Truck	85	40%	81
Concrete Pump	82	20%	75
Concrete Saw	90	20%	83
Crane (mobile or stationary)	85	20%	78
Dozer	85	40%	81
Dump Truck	84	40%	80
Excavator	85	40%	81
Front End Loader	80	40%	76
Generator (25 kilovolt amps or less)	70	50%	67
Generator (more than 25 kilovolt amps)	82	50%	79
Grader	85	40%	81
Hydra Break Ram	90	10%	80
Impact Pile Driver (diesel or drop)	95	20%	88
In situ Soil Sampling Rig	84	20%	77
Jackhammer	85	20%	78
Mounted Impact Hammer (hoe ram)	90	20%	83
Paver	85	50%	82
Pneumatic Tools	85	50%	82
Pumps	77	50%	74
Rock Drill	85	20%	78
Roller	74	40%	70
Scraper	85	40%	81
Tractor	84	40%	80
Vacuum Excavator (vac-truck)	85	40%	81
Vibratory Concrete Mixer	80	20%	73
Vibratory Pile Driver	95	20%	88
SOURCE: FHWA 2006.			
<sup>1</sup> Noise levels based on those specified in FHWA Road Construction Noise Model.			
<sup>2</sup> Amount of time equipment operates at full power.			
<sup>3</sup> Calculated average hourly noise level that takes duty cycle into account.			

During excavation, grading, and paving operations, equipment moves to different locations and goes through varying load cycles, and there are breaks for the operators and for non-equipment tasks, such as measurement. For this analysis, the simultaneous operation of two large pieces of construction equipment, such as an excavator and a loader, was modeled. This equipment would generate an average hourly noise level of approximately 82 dB(A)  $L_{eq}$  at 50 feet from the center of construction activity.

Construction/demolition equipment moves to different locations and goes through varying load cycles, and there are breaks for the operators and for non-equipment tasks. Thus,

equipment is not continuously generating noise. Although maximum noise levels may be 70 to 95 dB(A) at a distance of 50 feet during most construction activities, average hourly noise levels would be lower when taking into account equipment usage factors and breaks for non-equipment tasks. While the existing adjacent residences would be exposed to noise levels that may be heard above ambient conditions, the exposure would be temporary. All construction/demolition would occur during daytime hours consistent with the Noise Ordinance. However, due to the relatively quiet ambient noise environment in the project area, even temporary exposure to increased noise levels would be a significant impact. The project would implement mitigation measures NOS-1 and NOS-2, as set forth in detail in the MMRP. These measures would require implementation of a site-specific Noise Reduction Program and submitting specific construction noise measure requirements to the City for tracking purposes. Through implementation of the MMRP, mitigation measures NOS-1 and NOS-2 would reduce impacts associated with a temporary increase in ambient noise levels to less than significant.

### Operations Noise

Future housing development would result in additional housing, people, pets, and automobiles in the community. Noise is also likely to occur from stationary operation-related sources, such as heating, ventilation, and air conditioning (HVAC) units, tankless water heaters, generators, lawn maintenance equipment, and swimming pool pumps. Future housing development would be subject to discretionary permits and compliance with DMMC Chapter 9.20 (Noise Ordinance) and DMMC Chapter 23.08 (Design Review). The City's DRO is intended to implement the Community Plan. It requires most new development projects within the City to obtain a Design Review Permit in accordance with DMMC Chapter 23.08. The City Council-appointed Design Review Board also applies the Citywide Design Guidelines (adopted November 6, 2017, Resolution No. 2017-72) as applicable to single-family development. Though not binding, the Design Guidelines include quantifiable standards and criteria to add clarity, definition, and detail to the DRO's standards of review. The Design Review Board would not approve applications that include designs that would adversely affect the lighting or noise quality of the local neighborhood or fail to minimize noise created by a proposed project (traffic, air conditioning, use, etc.). Thus, adherence to discretionary permits and compliance with DMMC Chapter 9.20 (Noise Ordinance) and DMMC Chapter 23.08 (Design Review) would mitigate any potential impact from future housing to less than significant.

### **b. Less than Significant Impact**

The proposed project would involve construction activities that do not require the use of equipment that creates significant groundborne vibration or groundborne noise, and no uses occur in the area that produce vibration or groundborne noise. Project construction activities are not anticipated to generate excessive groundborne vibration or groundborne noise levels. Furthermore, the project would be required to comply with the DMMC Section 9.20.050, Construction Noise, which regulates construction activity, including demolition. Thus, the vibration and groundborne noise impacts associated with the proposed project would be less than significant.

**c. No Impact**

No public or private airports are located within two miles of the project site and would thus not result in the exposure of people on- or off-site to excessive noise levels. Therefore, the project would have no impact related to airport noise.

**NOS-1:** To reduce construction-related noise impacts, where construction activities would exceed the standards established in DMMC §9.20.050 (Construction Noise), the Applicant shall require construction contractors to implement a site-specific Noise Reduction Program, which includes the following measures, ongoing through demolition, grading, and/or construction:

- Equipment and trucks used for project construction shall utilize the best available noise control techniques (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically-attenuating shields or shrouds), wherever feasible.
- Construction noise reduction methods such as shutting off idling equipment, maximizing the distance between construction equipment staging areas and occupied residential areas, and use of electric air compressors and similar power tools, rather than diesel equipment, shall be used where feasible.
- During construction, stationary construction equipment shall be placed such that emitted noise is directed away from or shielded from sensitive noise receivers.
- During construction, stockpiling and vehicle staging areas shall be located as far as practical from noise sensitive receptors.
- Impact tools (e.g., jack hammers, pavement breakers, and rock drills) used for construction shall be hydraulically or electronically powered wherever possible to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where use of pneumatic tools is unavoidable, an exhaust muffler shall be used [this muffler can lower noise levels from the exhaust by up to approximately 10 dB(A)]. External jackets on the tools themselves shall be used where feasible (this can achieve an approximately 5.0 dB(A) reduction. Quieter procedures shall be used, such as drills rather than impact equipment, whenever feasible.

**NOS-2:** Prior to demolition, grading, or building permit approval, the Applicant shall submit to the Planning and Community Development Department a list of measures to respond to and track complaints pertaining to construction noise, ongoing throughout demolition, grading, and/or construction. At minimum, these measures shall include the following:

- A procedure to the public for notifying the City's Code Compliance Officer and Sheriff's Department (during regular construction hours and off-hours);
- A requirement for a sign to be posted by the Applicant on-site specifying the permitted construction days and hours, and notification procedure, and who to notify in the event of a noise-related concern. The sign shall also include the construction contractor's telephone numbers (during regular construction hours and off-hours); and

- A requirement for a preconstruction meeting to be held with the Applicant and general contractor/on-site project manager to confirm that noise measures and practices (including construction hours, neighborhood notification, posted signs, etc.) are completed.

## 4.14 Population and Housing

Would the project:

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Induce substantial unplanned 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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### EXPLANATIONS:

#### a. No Impact

The project would not induce population growth, either directly or indirectly, as the project site is currently configured in eight lots within the R1-40 (Very Low Residential) Zone. The proposed lot reconfiguration would maintain eight lots within the R1-40 Zone. As proposed, project construction would be limited to site improvements for utility lines, the existing private road, and an existing storage shed to be relocated. The project would include widening and lengthening of the existing private road. However, this road is located within the project boundaries and would not induce substantial unplanned population growth in the area. No residential development is proposed at this time; however, future development on the proposed lots 1, 2, 5, 6, 7, and 8 would allow for single-family residences. . As the lot reconfiguration does not increase the number of development lots in the R1-40 Zone from what is currently allowed, no growth inducing impacts would occur.

#### b. No Impact

The project would not displace the owners of the existing home on-site. Therefore, the project would not displace substantial numbers of existing housing or people, and no impact would occur.

## 4.15 Public Services

Would the project:

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
i. Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv. Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
v. Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### EXPLANATIONS:

#### a.i-ii. Less than Significant

##### *Fire and Police Protection*

The Del Mar Fire Department (DMFD) consists of one fire station located in the north part of the City on the San Diego County Fairgrounds at 2200 Jimmy Durante Boulevard. Personnel are comprised of nine full-time staff (three captains, three fire engineers, and three firefighters/paramedics). The DMFD operates one front-line fire engine, one rescue unit, and a reserve fire engine (City of Del Mar 2016a). DMFD's service area covers more than 2.5 square miles. DMFD's fire prevention and education program provides information on fuel management and as-needed inspections of fire lane access and turnaround areas, as well as Fire Code and safety compliance when needed. While the City is served by a single fire station, according to San Diego County's Operational Area Emergency Operations Plan, the City can request additional mutual aid assistance from other fire departments throughout San Diego County by requesting help from the Operational Area Fire and Rescue Coordinator dispatch center. Additionally, the DMFD provides mutual aid to the cities of Solana Beach, Encinitas, and portions of San Diego. DMFD does not operate under a firefighter/resident target ratio or response time goal.

The City contracts law enforcement services from the San Diego County Sheriff's Department (SDCSD). The City is provided routine patrol of city streets by patrol and traffic deputies, crime prevention services, and a wide array of other law enforcement services by the SDCSD Encinitas Station (North Coastal State) located at 175 North El Camino Real in the City of Encinitas (City of Del Mar 2016b). However, a satellite SDCSD office is provided at the City of Del Mar Civic Center at 1050 Camino del Mar. SDCSD does not have any required response times.

The project site is currently configured in eight lots within the R1-40 (Very Low Residential) Zone. The proposed lot reconfiguration would maintain eight lots within the R1-40 Zone. Future development of single-family residences on the proposed lots 1, 2, 5, 6, 7, and 8 would be required to adhere to DMMC Chapter 10.04 which incorporates the 2019 California Fire Code and 2018 International Fire Code. In general, this code provides regulations and requirements to protect residents and property from fire hazards (e.g., DMMC §10.04.070 sets roadway dimensions for emergency vehicle access to developments and DMMC §10.04.090 requires automatic sprinkler systems in new buildings. Future development would occur in locations near existing infrastructure (e.g., roads and utilities) and would be served by fire and other emergency responders currently providing services to the project area. As such, buildout of the project site is not anticipated to create the need to expand fire or law enforcement facilities. The City would review future development applications to ensure compliance with the established regulatory framework. Additionally, prior to issuance of occupancy permits, applicants of future development would be required to pay City fees for Fire Code plan review and inspections, and confirm adequate water service is provided onto each of the lots for fire sprinkler supply. Therefore, future development would not result in substantial adverse physical impacts associated with the provision of new or physically altered fire or law enforcement facilities. Thus, less than significant impacts would occur.

#### **a.iii-v. No Impact**

##### *Public Schools*

The City is within the jurisdiction of the Del Mar Union School District (DMUSD), which provides public education for elementary students, grades kindergarten through sixth grade. Two elementary schools, Del Mar Hills Academy and Del Mar Heights, are located north and south of Del Mar Heights Road west of I-5. The City is within jurisdiction of the San Dieguito Union High School District (SDUHSD), which provides public education for grades 7 through 12. All public schools are located outside of the City's jurisdictional boundary and within the cities of San Diego, Solana Beach, and Encinitas.

The project site is currently configured in eight lots within the R1-40 (Very Low Residential) Zone. The proposed lot reconfiguration would maintain eight lots within the R1-40 Zone. Future development of single-family residences on the proposed lots 1, 2, 5, 6, 7, and 8 would be subject to payment of school impact fees in accordance with SB 50 and DMMC Chapter 23.24 (School Facilities/Fees). Pursuant to Government Code §65995(3)(h), "payment of statutory fees is deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use or development of real property...". Further, DMMC Chapter 23.24 enables the City to



require land dedication, in lieu fees, or a combination of both from residential developers to address school overcrowding. This chapter provides a process for determining school crowding and developer requirements. Therefore, the proposed project and future development would not result in substantial adverse physical impacts associated with the provision of new school facilities. No impact would occur.

#### *Parks*

The project site is currently configured in eight lots within the R1-40 (Very Low Residential) Zone. The proposed lot reconfiguration would maintain eight lots within the R1-40 Zone. The City's estimated 2018 population was 4,322 persons (SANDAG 2019). As discussed in the City 6<sup>th</sup> Cycle Housing Element Draft Environmental Impact Report (2020), the City has 401 total acres of park and recreation land (including the beach). The park and recreation land supply exceeds demand by approximately 336 acres. Therefore, sufficient excess park and recreation land exists to meet future development of individual custom homes on the proposed lots 1, 2, 5, 6, 7, and 8. The project would not result in substantial physical deterioration of existing neighborhood or regional parks. Thus, no impacts to recreation facilities would occur.

#### *Other Public Facilities (Public Library)*

The project site is currently configured in eight lots within the R1-40 (Very Low Residential) Zone. The proposed lot reconfiguration would maintain eight lots within the R1-40 Zone. Currently, the City is served by two libraries within five miles of the project site - Del Mar Branch located at 1309 Camino del Mar in Del Mar and Carmel Valley Branch located east of Del Mar at 3919 Townsgate Drive in San Diego. The City would review future development applications to ensure compliance with the established regulatory framework. Thus, no impact would occur.

## 4.16 Recreation

Would the project:

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**EXPLANATIONS:****a–b. No Impact**

The City's recreational resources include various opportunities for both passive and active recreation including parks, beaches, open spaces, and reserves located throughout the City. These include approximately 371 acres of passive and active recreational resources in neighborhood and community parks and other recreational facilities throughout the City. The City's principal parks include Powerhouse Community Park and Seagrove Park, located between 15<sup>th</sup> and 18<sup>th</sup> streets on Coast Boulevard, and Shores Park located west of Camino del Mar and south of 9<sup>th</sup> Street. Seagrove Park, at the base of 15<sup>th</sup> Street, transitions into Powerhouse Park, which then stretches northward to 18<sup>th</sup> Street. Both parks include long turf areas that overlook Del Mar City Beach. There is a playground at the south end of Powerhouse Park, and the Powerhouse Community Center at the north end of the park. The Powerhouse Community Center includes amenities such as a community room, trellis-covered verandas, an outdoor theatre, outdoor rinse showers, and restrooms. Shores Park is currently used for informal recreation and as an intermittent dog park. No City recreational programming occurs on the site. Additionally, the City provides tennis courts for public use located at 21<sup>st</sup> Street off Court Street east of Camino del Mar.

Within the City, over 23 acres of public beach lands and the state-owned Del Mar Fairgrounds, also provide regional recreation opportunities. The City also owns approximately seven acres of Crest Canyon, which connects with the remainder of Crest Canyon that is owned and maintained by the City of San Diego. This canyon is tributary to the San Dieguito River floodplain and Lagoon and is part of a regional open space system within the City of San Diego. The City of Del Mar has over two miles of sandy beach along the Pacific coastline. The Del Mar Beach is generally a continuous sandy beach that runs the entire length of the City's westerly boundary. Areas along the City's beach are typically referenced in many different ways. The northernmost portion, located between the City's northern border with Solana Beach and the north side of the San Dieguito River inlet, is commonly referred to as Dog Beach or North Beach. The main beach is generally considered to run north from Powerhouse Park to the south side of the San Dieguito River inlet. The beach's southern portion runs from the south side of Powerhouse Park to the City's southern boundary where the beach connects with Torrey Pines State Beach.

The City's estimated 2018 population was 4,322 persons (SANDAG 2019). As discussed in the City 6<sup>th</sup> Cycle Housing Element Draft Environmental Impact Report (2020), the City has 401 total acres of park and recreation land comprised of 371 acres of passive and active recreational resources in neighborhood and community parks and other recreational facilities; 23 acres of public beach lands; and 7 acres of Crest Canyon. Pursuant to Objective 7 of the City's Community Plan which provides a standard of 15 acres of park and recreation land (including the beach) for every 1,000 persons, the City's park and recreation land supply exceeds demand by approximately 336 acres. Therefore, sufficient excess park and recreation land exists to meet future development of single-family residences on the proposed lots 1, 2, 5, 6, 7, and 8. The project would not result in substantial physical deterioration of existing neighborhood or regional parks and it would not require the expansion of recreational facilities. Thus, no impacts to recreation facilities would occur.

## 4.17 Transportation

Would the project:

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### EXPLANATIONS:

This section describes potential impacts related to transportation and is based on a Vehicle Miles Traveled (VMT) Analysis Technical Memorandum prepared for the project by Chen Ryan dated June 2, 2020. The report is included as Attachment 8 to this IS/MND.

The VMT analysis of transportation-related impacts is consistent with the State CEQA Guidelines §15064.3, Determining the Significance of Transportation Impacts, by focusing on the environmental impacts of traffic including noise, air pollution, safety concerns, and VMT. VMT is a transportation impact analysis metric that replaced level of service (LOS) in the CEQA transportation impact analysis when the State CEQA Guidelines were amended in December 2018. As amended, State CEQA Guidelines §15064.3 states that reduced LOS can no longer be considered an environmental impact under CEQA.

On June 1, 2020, the City of Del Mar City Council adopted Resolution 2020-24 that approved an update to the City's CEQA Guidelines to add significance thresholds and procedures for the review of anticipated transportation related impacts of projects that are subject to State CEQA Guidelines §15064.3. The new local CEQA Guidelines are consistent with the State CEQA Guidelines by focusing the transportation impact analysis on the environmental impacts of traffic instead of LOS. In accordance with the local Guidelines, several project types are listed that are presumed to cause a less than significant impact on the environment and are therefore "screened out" as exempt from VMT analysis. The

following applicable project types are included: (1) projects that generate less than 110 trips per day; and (2) projects of 11 single dwelling units or less.

#### **a. Less than Significant Impact**

Project construction activities would temporarily contribute to additional vehicle trips on the local circulation system. Construction traffic would likely use I-5, Via de la Valle, Jimmy Durante Boulevard, and Camino del Mar. Construction activity would initially be limited to the private road and utility improvements, and thereafter would likely be staggered based on the timing of construction of future single-family residential development (applications for development have not been submitted at this time). Thus, construction activities would not require a substantial amount of vehicle trips.

Trip generation for the future construction of single-family residences on lots 1, 2, 5, 6, 7, and 8 was calculated using the SANDAG Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region. Table 10 displays the number of daily and peak hour (AM and PM) trips the future residences on proposed lots 1, 2, 5, 6, 7, and 8 is anticipated to generate.

<b>Table 10</b>													
<b>Proposed Project Trip Generation</b>													
Land Use	Unit	Trip Rate	ADT	AM Peak Hour					PM Peak Hour				
				%	Trips	Split	In	Out	%	Trips	Split	In	Out
Single-Family	6 DU	10	60	8%	5	(3:7)	2	3	10%	6	(7:3)	4	2

As shown in Table 10, the future development of six residences on proposed lots 1, 2, 5, 6, 7, and 8 would generate 60 average daily traffic (ADT) with five trips during the AM peak hour (two inbound / three outbound) and six trips during the PM peak hour (four inbound / two outbound). As the proposed residences would result in less than 110 ADT, the project would not conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, nor would it interfere with other relevant components of the circulation system, including pedestrian/bicycle paths or mass transit. Impacts would be less than significant.

#### **b. Less than Significant Impact**

The City adopted local CEQA Guidelines on June 1, 2020, to address potential transportation-related VMT impacts of projects subject to CEQA. These Guidelines implement SB 743, by promoting public health, infill development, multimodal transportation networks and the reduction of greenhouse gas emissions. The City's Guidelines require analysis of whether the associated project VMT will cause significant impact on the environment. The City adopted the State-recommended threshold of 15 percent below the VMT per the baseline (i.e., existing conditions). Generally, projects that decrease average vehicle miles traveled per capita (e.g., resident, worker, customer) in the project area compared to existing conditions are considered to have a less than significant impact. In accordance with the City's Guidelines, residential projects that generate less than 110 trips per day; or projects of 11 single dwelling units or less are presumed to cause a less than significant impact on the environment, unless substantial evidence is otherwise identified that indicates the projects would generate a potentially significant level of VMT..

As described in the VMT Analysis Technical Memorandum (Chen Ryan 2020), the future development of six residences is anticipated to generate a total of 60 ADT, which is less than the 110 ADT threshold included in the City's local CEQA Guidelines. Impacts would be less than significant.

**c. No Impact**

The project would not substantially increase hazards due to a transportation design feature or incompatible uses. The City has adopted the California Fire Code, which applies to all proposed development. DMMC §10.04.070 (Fire Apparatus Access Roads) that requires compliance with emergency access design standards as part of new construction of roads to provide sufficient access for emergency equipment. The Fire Code also sets minimum standards for road dimension, design, grades, and other fire safety features. Additionally, more stringent California Building Code (CBC) standards also apply regarding new construction and development of emergency access issues associated with earthquakes, flooding, climate/strong winds, and water shortages. Project construction would widen and lengthen the existing private road to allow access to proposed lots on the easterly side of the property. No change to the City roadway design would result from the project. Therefore, the project would have no impact to hazards due to a design feature or incompatible uses.

**d. No Impact**

The project site is accessible via the existing gated and paved private road off Serpentine Drive. Proposed lots 5 through 8 are adjacent to the San Dieguito Lagoon and would require improvements to the existing road off San Dieguito Drive. As previously mentioned, the City has adopted the California Fire Code and DMMC §10.04.070 (Fire Apparatus Access Roads) that requires compliance with emergency access design standards as part of new construction of roads to provide sufficient access for emergency equipment. The Fire Code also sets standards for road dimension, design, grades, and other fire safety features. Additionally, more stringent CBC standards also apply regarding new construction and development of emergency access issues associated with earthquakes, flooding, climate/strong winds, and water shortages. Future housing development would be required to comply with applicable building and fire safety regulations required for the design of new housing and emergency access. Thus, compliance with the DMMC would ensure adequate access issues, including emergency access. Therefore, no impact would occur.

## 4.18 Tribal Cultural Resources

Would the project:

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. 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:				
i. 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)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii. 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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



**EXPLANATIONS:****a.i-ii. Potentially Significant Unless Mitigation Incorporated**

A letter was sent to the California NAHC on February 19, 2020, requesting a search of their Sacred Lands File. The NAHC sent a reply on March 4, 2020, indicating that they had no record of Native American cultural resources in the immediate area of the project; however, they included a list of Native American tribes who may have knowledge of cultural resources within the project site. Based on the information received from the NAHC, the City provided formal notification pursuant AB 52 on March 26, 2020. Correspondence was sent to the designated contact/tribal representative for the following tribes:

- Manzanita Band of Kumeyaay Nation
- Viejas Band of Kumeyaay Indians
- Sycuan Band of the Kumeyaay Nation
- Lipay Nation of Santa Ysabel
- Lipay Nation of Santa Ysabel (note: two separate contacts for the Lipay Nation of Santa Ysabel)
- La Posta Band of Mission Indians
- Kwaaymii Laguna Band of Mission Indians
- Jamul Indian Village
- Ewiiapaayp Band of Kumeyaay Indians
- Campo Kumeyaay Nation

Refer to Attachment 9 for copies of the correspondence. Per AB 52, tribes must respond in writing within 30 days of receipt of the formal notification from the City and request consultation. No responses from the tribes contacted were received.

A field survey was conducted on February 26, 2020, by RECON archaeologist Nathaniel Yerka, accompanied by Gabe Kitchen and Gretchen White, Native American monitors from Red Tail Environmental. Also in attendance were David Marshall from Heritage Architecture & Planning, Greg Shannon from Sedona Pacific Corporation, and Jean Crutchfield from the City. No previously unrecorded archaeological resources were observed during the survey. The proposed project does not include grading or any other ground-disturbing activities. Potential impacts to archaeological resources would be analyzed on a lot-by-lot basis as each development is individually proposed. Applications for future development where the City has determined a potential for impacts to tribal cultural resources, shall be required to comply with the following mitigation measure CUL-2. Compliance with mitigation measure CUL-2 would reduce potential impacts related to archaeological resources to a level less than significant.

**Mitigation Measures**

Implementation of Mitigation Measure CUL-2.

## 4.19 Utilities and Service Systems

Would the project:

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Comply with federal, state, and local management and reduction statutes and regulation related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### EXPLANATIONS:

#### a. Less than Significant Impact

Project construction would be limited to site improvements for utility lines, the existing private road, and an existing storage shed to be relocated. No residential development is

proposed at this time; however, future single-family development on the proposed lots 1, 2, 5, 6, 7, and 8 is anticipated at a later date. The analysis below discusses potential impacts from future development.

**Water Facilities.** Domestic water in the City is provided by the City of San Diego and via the San Diego County Water Authority (SDCWA). The City of San Diego treats more than 360 million gallons of water per year for Del Mar and transports the water approximately 14 miles to Del Mar from the Lake Miramar Treatment Plant (Santa Fe Irrigation District 2019). The City currently uses an average of 1,050 acre-feet of water per year but has a capacity to provide approximately 1,800 acre-feet per year (City of Del Mar 2020). The water pressure in the local water distribution system is controlled by a pressure-reducing station located northeast of the South Cedros Avenue at Via de la Valle intersection. A 6-inch diameter reclaimed water line owned and operated by the City is located within Camino del Mar. The Del Mar CAP identifies a projected annual water supply for the City of 381 million gallons (1,169 acre-feet) for 2020 (City of Del Mar 2020).

Water service throughout the City is provided by the City's Public Works Department, which handles the operation and maintenance of the City's infrastructure, including the storm drain system, streets, water supply, and sanitary sewer systems. Water would be supplied to future development by the City's Public Works Department. Future development would be expected to connect to the City's domestic water supply system in adjacent areas and would provide infrastructure/pipelines that are adequately sized to accommodate its demands. Applicants for future development projects would be required to submit a Utility Service Application to the City.

Under DMMC Title 21 (Water Supply), the City established provisions for regulation, use, and operation of the City's water system, as acquired from the City of Del Mar Utilities. DMMC Title 21 regulations relating to service connections, water rates and charges, extensions of water mains, backflow, administrative enforcement, water conservation, and emergency water management are addressed, and all projects within the City must be in conformance. In November 2019, the City formally adopted the 2019 California Energy Code for prescribing regulations associated with conservation measures applicable to building and construction standards (DMMC §23.12.050). On June 6, 2016, the Del Mar City Council adopted a CAP, which sets targets for reducing GHG emissions by 2020 and 2035, identifies strategies to meet the targets, and formulates a plan for implementation. CAP Goal 9 calls for the reduction of outdoor water consumption by 20 gallons (6.1 acre-feet) per capita per day by 2020 and 30 gallons (9.2 acre-feet) per capita per day by 2035. Therefore, future development would not require the construction or expansion of public water facilities.

**Wastewater Treatment Facilities.** The City owns and operates a sanitary sewer collection system. Wastewater generated by future development would be treated at the San Elijo Joint Powers Authority San Elijo Wastewater Treatment Facility which processes most (98 percent) of the City's wastewater; however, the remainder (2 percent) including extreme emergency flows can be sent to Metro Wastewater Joint Powers Authority Point Loma Wastewater Treatment Plant and the North City Water Reclamation Plant. Future development would be expected to connect to existing wastewater infrastructure in adjacent

areas. Therefore, future development would not require the construction or expansion of wastewater facilities.

**Storm Water.** All storm water infrastructure, including on- and off-site improvements, would connect to the City's existing storm water infrastructure. The City also implements a Clean Water Program to prevent urban runoff from polluting the lagoons and ocean. The program includes water-quality monitoring; street and storm drain cleaning and maintenance; construction site inspections, permit fees, and public education. Under DMMC Chapter 11.30 (Stormwater Management and Discharge Control), the City prohibits polluted non-stormwater discharges to the stormwater conveyance system, in addition to establishes minimum requirements for stormwater management, development project low impact development site design, requirements for the management of stormwater flows from development projects, standards for the use of off-site facilities for stormwater management to supplement on-site practices at new development sites, and notice procedures and standards for adjusting stormwater and non-stormwater management requirements where necessary. Thus, future development would not require construction of new storm water treatment and conveyance facilities, including on-site storm drains and water quality biofiltration basins.

**Solid Waste.** The City has an exclusive franchise agreement with Waste Management-North County for solid waste services, including refuse, recycling, and green waste. Residential trash, recycling, and green waste is collected weekly. The City's solid waste is collected and transported to the Palomar Transfer Station and then the non-recyclables are transported for disposal to the West Miramar Sanitary Landfill (Miramar Landfill) located just north of State Route 52, between Interstate 805 and State Route 163 in the City of San Diego. Under DMMC Chapter 11.20, rules and regulations were adopted to manage the City's solid waste and conform to AB 341 regulations. DMMC Chapter 11.20 was in part based on the County of San Diego's Municipal Code, including ordinances for construction debris diversion and recycling. In August 2019, the City adopted a Construction and Demolition Waste Recycling Ordinance, creating a process to demonstrate compliance with CALGreen building requirements. Projects subject to CALGreen regulations are required to divert 65 percent of construction-related waste from landfills (DMMC Chapter 23.70). As such, future development could be adequately serviced without need for construction or expansion of solid waste facilities.

**Dry Utilities (i.e., Electric Power, Natural Gas, and Telecommunications).** The project site is located near existing electric power, natural gas, and telecommunications facilities. San Diego Gas & Electric (SDG&E) currently provides natural gas and electricity service in the County through their transmission and distribution infrastructure. As of October 2019, the City Council adopted an ordinance to implement a CCE Program, with a planned launch date of 2021. The CCE Program is in partnership with the cities of Solana Beach and Carlsbad and is operated through a JPA, specifically, the CEA. The CEA's purpose is to offer competitive rates to residents and reduce GHG emissions. The Joint Powers Agreement requires CEA to always offer a greater base energy product than SDG&E, leading to competitive rates. Once the CEA begins, residents and businesses will automatically be enrolled into a power supply portfolio with greater than or equal to 50 percent renewable power sources. Residents and businesses will have the choice to opt out entirely or opt into 100 percent renewable power sources. CEA plans to offer

100 percent renewable power sources to all customers by 2035. Further, adequate telecommunications services are provided throughout the City (e.g., telephone, internet, cable).

While future construction and operation would result in increased water, wastewater treatment, electric power, natural gas, and telecommunications demands, and wastewater and solid waste generation, the project does not result in any net new lots being created from what currently exists for single-family residential development. The project site is currently configured in eight lots within the R1-40 (Very Low Residential) Zone. The proposed lot reconfiguration would maintain eight lots within the R1-40 Zone. Any construction and operation effects associated with future buildout to utilities and service systems can be sufficiently serviced and would be subject to compliance with all federal, state, and local requirements for minimizing construction and operational impacts to utilities, including water and wastewater system capacities, solid waste reduction goals, and supplies of electric power, natural gas, and telecommunications.

Since all future development within the project site would be required to adhere to relevant regulations and requirements associated with facilities, impacts regarding the relocation or construction of utilities would be less than significant.

#### **b. No Impact**

As proposed, project construction would be limited to site improvements for utility lines, the existing private road, and an existing storage shed to be relocated. No residential development is proposed at this time; however, future development on the proposed lots 1, 2, 5, 6, 7, and 8 would allow for single-family residences. The project site is currently configured in eight lots within the R1-40 (Very Low Residential) Zone. The proposed lot reconfiguration would maintain eight lots within the R1-40 Zone. Future development would be subject to discretionary permits and required to adhere to all federal, state, and local requirements during construction and operation for ensuring that sufficient water supplies are available and projects adhere to local requirements, including DMMC Title 21 and the City's CAP. Further, future development would be required to present will-serve letters or submit a Utility Service Application to the City substantiating that adequate water supplies would be available. Considering these requirements, sufficient water supplies would be available to serve the development of six single-family residences. Conformance with all regulatory requirements would ensure that the proposed project would not have a substantial adverse effect on water supplies. Thus, no impacts would occur.

#### **c. Less than Significant Impact**

As proposed, project construction would be limited to site improvements for utility lines, the existing private road, and an existing storage shed to be relocated. No residential development is proposed at this time; however, future development on the proposed lots 1, 2, 5, 6, 7, and 8 would allow for single-family residences. Future development would be subject to discretionary permits and required to adhere to all federal, state, and local requirements related to wastewater treatment during construction and operations, including the City's Stormwater Management and Discharge Control Ordinance (DMMC Chapter 11.30), the City's BMP Design Manual, and the General Permit for Discharges of

Stormwater Associated with Construction Activity (Construction General Permit Order 2009-0009-DWQ). The Construction General Permit requires the development of a SWPPP by a certified Qualified SWPPP Developer. Conformance with all regulatory requirements would ensure that the proposed project would not have a substantial adverse effect on the increase in wastewater. Thus, impacts would be less than significant.

#### **d and e. Less than Significant Impact**

Project construction may generate debris requiring disposal. However, the project would comply with DMMC Chapter 23.70 Construction and Demolition Debris Recycling, which provides guidance for the disposal of demolition debris on a project (City of Del Mar 2020). Furthermore, current landfill capacities within the San Diego region would be able to accommodate debris generated during demolition and construction activities, as well as solid waste generated during operation. Therefore, impacts related to solid waste would be less than significant.

## **4.20 Wildfire**

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

<b>Issue</b>	<b>Potentially Significant Impact</b>	<b>Potentially Significant Unless Mitigation Incorporated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
d. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**EXPLANATIONS:****a. No Impact**

CAL FIRE has mapped areas of significant fire hazards in San Diego County into different fire hazard severity zones (FHSZ) based upon fuels, terrain, weather, and other relevant factors. Portions of the project site are located in the Very High FHSZ within the local responsibility area (CAL FIRE 2009). Additionally, the project area is mapped within the WUI Zone. Wildfires may originate in undeveloped areas and spread to developed or urban areas where landscape and structures are not designed and maintained to be fire-resistant. Areas where residential developments are built or located among lands prone to wildfires are characterized as WUI areas. In general, a WUI is an area where structures and other human developments meet or intermingle with wildland vegetative fuels, including shrubs, trees, and grasses.

Project construction would not impair or physically interfere with an adopted emergency response or evacuation plan. The City and County Emergency Operations Plans guide the integration and coordination within other governmental agencies that are required during an emergency to serve the existing and future public safety needs in the city. The Emergency Operations Plans identify evacuation routes, emergency facilities, and personnel, and describes the overall responsibilities of federal, state, regional, and city entities.

The City has adopted and implemented programs to reduce and prevent risks associated with wildfire including DMMC §2.52.020 (Emergency Plan), DMMC Chapter 10.04 (Fire Code), and DMMC Chapter 23.12 (Uniform Codes for Construction Building Code). Future development would be subject to discretionary permits and required to meet the mandatory requirements related to the prevention of wildfire impacts. DMMC §10.04.070 (Fire Apparatus Access Roads), requires compliance with emergency access design standards as part of new construction of roads to provide sufficient access for emergency equipment. The Fire Code also sets standards for road dimension, design, grades, and other fire safety features. Additionally, more stringent CBC standards also apply regarding new construction and development of emergency access issues associated with earthquakes, flooding, climate/strong winds, and water shortages. Future development would be required to comply with applicable building and fire safety regulations required for the design of new housing and emergency access.



The project site is currently configured in eight lots within the R1-40 (Very Low Residential) Zone. The proposed lot reconfiguration would maintain eight lots within the R1-40 Zone. Future development would be subject to discretionary permits and required to comply with the regulations described above to maintain adequate availability of emergency services during an emergency response or an emergency evacuation which would prevent impairment of an adopted emergency response plan or emergency evacuation plan. As a result, the project would not substantially impair an adopted local or county-wide emergency response or evacuation plan and impacts would be less than significant.

**b. Less than Significant Impact**

Project construction would be limited to site improvements for utility lines, the existing private road, and an existing storage shed to be relocated. Future development would be subject to discretionary permits and required to adhere to mandatory fire prevention requirements and regulations of DMMC Chapter 10.04 (Fire Prevention, which incorporates the 2019 California Fire Code) and DMMC Section 10.04.070-503 (Fire Apparatus Access Roads). Future development would be required to adhere to mandatory fire prevention requirements and regulations, including the California Fire Code Chapter 49, Requirements for Wildland-Urban Interface Fire Areas that would require applicants to prepare a fire protection plan for development sites located in the Very High FHSZ or WUI areas, where applicable. The requirements include sufficient fuel modification around structures and other vegetation maintenance measures to minimize risk from wildfire. Adherence to state and local fire codes are intended to reduce risks in conjunction with future development related to wildland fire. As a result, impacts associated with wildland fires would be less than significant. Therefore, impacts related to the exposure of project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire would be less than significant.

**c. No Impact**

The site is accessible via the existing gated and paved private road off Serpentine Drive, Zapu Road, and Gatun Street. Proposed lots 5 through 8 are adjacent to the San Dieguito Lagoon and would require a new private road off San Dieguito Drive. The widening and lengthening of the existing private road (to be named La Atalaya Road) would allow for easier access throughout the project site. Therefore, the project would not include 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. Future development would be required to offset wildfire exposure by complying with the wildfire protection building construction requirements contained in the 2019 California Building Codes, including the California Building Code, Chapter 7A, California Residential Code, §R327, and California Referenced Standards Code, Chapter 12-7A. No impact would occur.

**d. No Impact**

As described in 4.20(a) above, the project site is located in the WUI and, therefore, the natural environment of the WUI sites indicate people and structures are highly prone to

wildfires and downslope or downstream flooding as a result of runoff, post-fire instability or drainage. Applicants for future housing development within the WUI would be required to submit a fire protection plan. Adherence to State and City codes, and emergency and evacuation plans set by the City and the County of San Diego (including the Countywide Multi-Jurisdiction Hazard Mitigation Plan [MHMP] that identifies risks and ways to minimize damage by natural and manmade disasters; the City is party to the County's MHMP) would prevent impacts to people or structures from significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. Therefore, impacts would be less than significant.

## 4.21 Mandatory Findings of Significance

Does the project:

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Have the potential to 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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. 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 futures projects)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**EXPLANATIONS:****a. Potentially Significant Unless Mitigation Incorporated**

As described in Section 4.4 above, implementation of the City's Tree Ordinance (DMMC Section 23.50) and associated Public Tree Policy Manual (2004) would reduce significant impacts to Torrey Pine trees to a level less than significant. Although no coastal California gnatcatchers were observed during focused surveys in 2019, mitigation measure BIO-1 would ensure avoidance measures and noise reduction measures would be implemented to ensure direct impacts do not occur. In addition, the study area supports native habitats, non-native vegetation, and ornamental vegetation which could provide potential nesting and foraging habitat for a variety of songbirds and raptors in the area. Although no active or inactive nests were identified during the surveys, there is a potential for birds to nest within the project site. If future development occurs during the breeding season (February 1 to July 15 for raptors and January 15 to August 31 for other birds), nesting raptors and other nesting birds could be directly impacted by vegetation clearing activities. Mitigation measure BIO-2 outlines protection measures which would be required to avoid impacts to nesting bird species covered under the Migratory Bird Treaty Act, through either construction avoidance of the bird breeding season or breeding bird surveys.

Additionally, as described in Section 4.5, the snake wall is considered a significant resource under Criterion C of the California Register. Mitigation measure CUL-1 would reduce potential impacts to the snake wall to a level less than significant.

**b. Potentially Significant Unless Mitigation Incorporated (Cumulative)**

As described in Sections 4.1 through 4.20, project impacts and future development impacts would be reduced with mitigation measures and conformance with all regulatory compliance. Potential impacts would be localized and limited to the short-term construction period, and the project (including buildout) would not result in conflicts with applicable land use plans and policies. In the event of other future development in the surrounding area, adherence to all applicable local, state, and federal regulations would be required to reduce potential impacts to a less than significant level. Therefore, the project is not anticipated to contribute to considerable environmental impacts, and impacts would be less than significant.

**c. Less than Significant Impact**

The project would not result in any substantial adverse direct or indirect impacts to human beings. With adherence to applicable codes and regulations, potential direct or indirect impacts on humans resulting from the proposed project would be less than significant.

## 5.0 Mitigation Monitoring and Reporting Program

Section 21081.6 of the Public Resources Code and Section 15097 of the CEQA Guidelines require adoption of a Mitigation Monitoring and Reporting Program (MMRP) for all projects for which an EIR or MND has been prepared. This requirement was originally mandated by AB 3180 which was enacted on January 1, 1989, to ensure the implementation of all mitigation measures adopted through the CEQA process. Specifically, Section 21081.6 of the Public Resources Code states that “...the agency shall adopt a reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment...[and that the program]...shall be designed to ensure compliance during project implementation.”

AB 3180 provided general guidelines for implementing monitoring and reporting programs, which are enumerated in more detail in Section 15097 of the CEQA Guidelines. Specific reporting and/or monitoring requirements to be enforced during project implementation are defined prior to final approval of the project. The proposed monitoring and reporting program will be considered by the City of Del Mar (the lead agency) prior to certification of the MND. Although the lead agency may delegate reporting or monitoring responsibilities to other agencies or entities, it “...remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the program.”

As shown in Table 11, each mitigation measure is categorized by impact area and corresponding number, with an accompanying identification of:

- The time of the project during which the measure should be implemented;
- The responsible monitoring party; and
- The action indicating compliance with the mitigation measure.

<p><b>Table 11</b> <b>Mitigation Monitoring and Reporting Plan</b></p>			
Mitigation Measure	Implementation/Timing	Responsible Monitoring Party	Compliance Action
<p><b>BIO-1:</b> Prior to the issuance of any building permit for future home development on lots 1 and 8, site-specific biological surveys shall be conducted to delineate the precise location of sensitive habitat and assess project-specific impacts. The biological survey shall include:</p> <ol style="list-style-type: none"> <li>1. The methods used to determine the presence of sensitive biological resources;</li> <li>2. Vegetation mapping of all vegetation communities and/or land cover types;</li> <li>3. The locations of any sensitive plant or wildlife species;</li> <li>4. An evaluation of the potential for occurrence of any listed, rare, and narrow endemic species; and</li> <li>5. An evaluation of the significance of any potential direct or indirect impacts from the proposed project.</li> </ol> <p>If potentially significant impacts to sensitive biological resources are identified, future project level grading and site plans shall incorporate project design features to minimize direct impacts on sensitive resources to the extent feasible, and the report shall also review the mitigation already identified and dedicated as deed restricted open space on the Final Subdivision Map. Figure 5 shows the areas that will be deed restricted open space upon recordation of the Final Subdivision Map and identifies the habitat type and area of each mitigation open space. By setting aside four future mitigation areas (as shown on Figure 5) each development already has enough mitigation available to fully mitigate for their proposed project-based impacts. If the specific plans for homebuilding result in habitat impacts greater than the mitigation set aside in the Final Subdivision Map specified above, then the site specific biological surveys</p>	<p>Prior to the issuance of any building permit for future home development</p>	<p>Applicant</p>	<p>Site-specific biological surveys</p>

**Table 11**  
**Mitigation Monitoring and Reporting Plan**

Mitigation Measure	Implementation/Timing	Responsible Monitoring Party	Compliance Action
required for lots 1 and 8, as applicable shall also recommend appropriate mitigation to be implemented by the future homebuilding applicant to reduce the impacts to below a level of significance. No future site-specific biological surveys and no habitat mitigation is required for issuance of any permits related to lots 3 through 7.			
<b>BIO-2:</b> If future development occurs during the breeding season (February 1 to July 15 for raptors and January 15 to August 31 for other birds) and otherwise cannot be avoided, the applicant shall be responsible for a qualified biologist to conduct a pre-construction nesting bird survey prior to the commencement of any ground disturbing activities to determine the presence/absence, location, and status of any active nests on or adjacent to the survey area. The extent of the survey buffer area surrounding each site shall be established by the qualified biologist to ensure that direct and indirect effects to nesting birds are avoided. To avoid the destruction of active nests and to protect the reproductive success of birds protected by the Migratory Bird Treaty Act and the California Fish and Game Code and minimize the potential for project delay, nesting bird surveys shall be performed by the qualified biologist prior to project commencement. In the event that active nests are discovered, the biologist shall recommend suitable noise attenuation measures or a suitable buffer (distance to be determined by the biologist) shall be established around such active nests, and no construction within the buffer shall be allowed until the biologist has determined that the nest(s) is no longer active (i.e., the nestlings have fledged and are no longer reliant on the nest). Completion of this mitigation measure shall be a condition of any future homebuilding permits issued for any of the lots	If future development occurs during the breeding season (February 1 to July 15 for raptors and January 15 to August 31 for other birds) and otherwise cannot be avoided.	Applicant	Pre-construction Nesting Bird Survey

<p><b>Table 11</b> <b>Mitigation Monitoring and Reporting Plan</b></p>			
Mitigation Measure	Implementation/Timing	Responsible Monitoring Party	Compliance Action
included in the La Atalaya Final Subdivision Map.			
<b>CUL-1:</b> Prior to modification of the snake wall, the project applicant shall hire a professional who is qualified to complete the Secretary of the Interior's Standards for Architectural and Engineering documentation in order to mitigate the Snake Wall in the form of the equivalent to Historic American Building Survey (HABS) documentation. HABS level I documentation includes a full set of drawings depicting existing or historic conditions and large format negative photographs in black and white of exterior and interior views to add to the written history and description in the existing report titled La Atalaya – Snake Wall Historic Evaluation Report. The drawings shall include a site plan, elevations, cross sections, and details of construction techniques and architectural elements.	Prior to modification of the snake wall	Applicant	Historic American Building Survey (HABS) documentation
<b>CUL-2:</b> Unanticipated Discovery of Tribal Cultural and Archaeological Resources: Upon discovery of any tribal, cultural, or archaeological resources during ground-disturbing activities, the Applicant shall immediately cease such activities in the immediate vicinity. The find will then be assessed by a qualified archeologist retained by the Applicant and a tribal monitor/consultant approved by the consulting tribe. The Applicant shall promptly notify the Planning and Community Development Director to the discovery of resources. If the resources are Native American in origin, the consulting tribe shall coordinate with the landowner regarding treatment and curation of these resources. Typically, the tribe will request preservation in place or recovery for educational purposes. At the direction of the qualified archaeologist and tribal monitor/consultant, and in coordination with the Planning and Community	During ground-disturbing activities	Applicant	Assessment



**Table 11**  
**Mitigation Monitoring and Reporting Plan**

Mitigation Measure	Implementation/Timing	Responsible Monitoring Party	Compliance Action
Development Department, work may continue on other parts of the affected site while evaluation and, if necessary, additional protective measures are completed at the affected portion of the site pursuant to State CEQA Guidelines §15064.5[f]. If a resource is determined by the qualified archaeologist to constitute a “historical resource” or “unique archaeological resource,” time and funding to allow for sufficient implementation of avoidance measures must be made available. The treatment plan established for the resources shall be in accordance with State CEQA Guidelines §15064.5(f) for historical resources. Preservation in place (i.e., avoidance) is the preferred manner of treatment upon identification of unique archeological resources (Public Resources Code §§21083.2(b)). If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. All tribal cultural resources shall be returned to the consulting tribe. Any historic archaeological material that is not Native American in origin shall be curated at a public, non-profit institution with a research interest in the materials, such as the San Diego Archeological Center. Acceptance and curation of the historic archeological materials will be at the discretion of the institution. If no institution accepts the archaeological material, they shall be offered to the consulting tribe or the Del Mar Historical Society for educational purposes.			
GEO-1: For future development identified as having high paleontological sensitivity, the applicant shall:  a. Prior to ground disturbing activities, the Applicant shall retain a qualified Project Paleontologist, defined	Prior to Ground Disturbing Activities for Future Development	Applicant	Prepare a Paleontological Monitoring and Compliance Program and

**Table 11**  
**Mitigation Monitoring and Reporting Plan**

Mitigation Measure	Implementation/Timing	Responsible Monitoring Party	Compliance Action
<p>as a paleontologist who meets the Society of Vertebrate Paleontology standards for Qualified Professional Paleontologist, to direct all mitigation measures related to paleontological resources.</p> <p>b. Prepare a Paleontological Monitoring and Compliance Program. After design of the development has been finalized to determine the precise extent and location of ground disturbing activities, and prior to ground disturbing activities, the Project Paleontologist shall prepare a Paleontological Monitoring and Compliance Program to be implemented during the ground disturbing activities. The program shall be prepared in accordance with the standards set forth by current Society of Vertebrate Paleontology guidelines (2010). Prior to ground disturbing activities, the program shall be provided to the City of Del Mar.</p> <p>Ground disturbing activities where paleontological sensitivity has been identified shall be monitored full-time by a qualified paleontological monitor during initial ground disturbing activities.</p> <p>The program shall be supervised by the Project Paleontologist in coordination with the City. The duration and timing of the monitoring shall be determined by the Project Paleontologist. If the Project Paleontologist determines that full-time monitoring is no longer warranted, he or she may recommend to the City that monitoring be reduced to periodic spot-checking or cease entirely. Monitoring shall be reinstated, if reduction or suspension would need to be reconsidered by the Project Paleontologist.</p>			Report

**Table 11**  
**Mitigation Monitoring and Reporting Plan**

Mitigation Measure	Implementation/Timing	Responsible Monitoring Party	Compliance Action
<p>The program shall outline the procedures for construction staff Worker Environmental Awareness Program (WEAP) training, paleontological monitoring extent and duration, salvage and preparation of fossils, the final mitigation and monitoring report, and paleontological staff qualifications.</p> <p>c. Paleontological WEAP. Prior to ground disturbing activities, the Project Paleontologist or his or her designee shall conduct construction personnel training regarding the appearance of fossils and the procedures for notifying paleontological staff should fossils be discovered by construction staff. The WEAP shall be presented at a preconstruction meeting that a qualified paleontologist shall attend.</p> <p>d. Fossil Discovery. In the event of a fossil discovery by construction personnel, all work in the find's immediate vicinity shall cease, and the City of Del Mar and a qualified paleontologist shall be contacted to evaluate the find before restarting work in the area. If ground disturbing activities bring potentially sensitive geologic deposits to the surface in areas considered to have an undetermined paleontological sensitivity, these areas shall be inspected and further assessed. If it is determined that the fossil(s) is (are) scientifically significant, the qualified paleontologist shall complete the following conditions:</p> <p>i. Salvage of Fossils. If fossils are discovered, the Project Paleontologist or paleontological monitor shall recover them. Typically, fossils can be safely</p>			

**Table 11**  
**Mitigation Monitoring and Reporting Plan**

Mitigation Measure	Implementation/Timing	Responsible Monitoring Party	Compliance Action
<p>salvaged quickly by a single paleontologist and not disrupt construction activity. In some cases, larger fossils (such as complete skeletons or large mammal fossils) require more extensive excavation and longer salvage periods. In this case, the paleontologist shall have the authority to temporarily direct, divert, or halt construction activity to ensure that the fossil(s) can be removed in a safe and timely manner.</p> <p>ii. Preparation and Curation of Recovered Fossils. Once salvaged, the City shall ensure that significant fossils are identified to the lowest possible taxonomic level, prepared to a curation-ready condition, and curated in a scientific institution with a permanent paleontological collection (such as the San Diego County Natural History Museum), along with all pertinent field notes, photos, data, and maps. Fossils of undetermined significance at the time of collection may also warrant curation at the discretion of the Project Paleontologist. Field collection and preparation of fossil specimens shall be performed by the Project Paleontologist with further preparation as needed by an accredited museum repository institution at the time of curation.</p> <p>e. Final Paleontological Monitoring and Compliance Report. Upon completion of ground disturbing activities (and curation of fossils, if necessary) the Project Paleontologist shall prepare a Final Paleontological Monitoring and Compliance Report</p>			

<p><b>Table 11</b> <b>Mitigation Monitoring and Reporting Plan</b></p>			
Mitigation Measure	Implementation/Timing	Responsible Monitoring Party	Compliance Action
<p>outlining the results of the Paleontological Monitoring and Compliance Program. The report shall be provided to the City of Del Mar and shall include discussion of the location, duration, and methods of the monitoring, stratigraphic sections, any recovered fossils, and the scientific significance of those fossils, and where fossils were curated.</p>			
<p><b>NOS-1:</b> To reduce construction-related noise impacts, where construction activities would exceed the standards established in DMMC § 9.20.050 (Construction Noise), the Applicant shall require construction contractors to implement a site-specific Noise Reduction Program, which includes the following measures, ongoing through demolition, grading, and/or construction:</p> <ul style="list-style-type: none"> <li>• Equipment and trucks used for project construction shall utilize the best available noise control techniques (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically-attenuating shields or shrouds), wherever feasible.</li> <li>• Construction noise reduction methods such as shutting off idling equipment, maximizing the distance between construction equipment staging areas and occupied residential areas, and use of electric air compressors and similar power tools, rather than diesel equipment, shall be used where feasible.</li> <li>• During construction, stationary construction equipment shall be placed such that emitted noise is directed away from or shielded from sensitive noise receivers.</li> <li>• During construction, stockpiling and vehicle staging areas shall be located as far as practical from noise</li> </ul>	<p>Ongoing through demolition, grading, and/or construction</p>	<p>Applicant</p>	<p>A site-specific Noise Reduction Program</p>

**Table 11**  
**Mitigation Monitoring and Reporting Plan**

Mitigation Measure	Implementation/Timing	Responsible Monitoring Party	Compliance Action
<p>sensitive receptors.</p> <ul style="list-style-type: none"> <li>Impact tools (e.g., jack hammers, pavement breakers, and rock drills) used for construction shall be hydraulically or electronically powered wherever possible to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where use of pneumatic tools is unavoidable, an exhaust muffler shall be used [this muffler can lower noise levels from the exhaust by up to approximately 10 dB(A)]. External jackets on the tools themselves shall be used where feasible (this can achieve an approximately 5.0-dBA reduction. Quieter procedures shall be used, such as drills rather than impact equipment, whenever feasible.</li> </ul>			
<p><b>NOS-2:</b> Prior to demolition, grading, or building permit approval, the Applicant shall submit to the Planning and Community Development Department a list of measures to respond to and track complaints pertaining to construction noise, ongoing throughout demolition, grading, and/or construction. At minimum, these measures shall include the following:</p> <ul style="list-style-type: none"> <li>A procedure to the public for notifying the City's Code Compliance Officer and Sheriff's Department (during regular construction hours and off-hours);</li> <li>A requirement for a sign to be posted by the Applicant on-site specifying the permitted construction days and hours, and notification procedure, and who to notify in the event of a noise-related concern. The sign shall also include the construction contractor's telephone numbers (during regular construction hours and off-hours); and</li> <li>A requirement for a preconstruction meeting to be held with the Applicant and general contractor/on-</li> </ul>	<p>Prior to demolition, grading, or building permit approval</p>	<p>Applicant</p>	<p>A list of measures to respond to and track complaints pertaining to construction noise, ongoing throughout demolition, grading, and/or construction</p>

**Table 11**  
**Mitigation Monitoring and Reporting Plan**

Mitigation Measure	Implementation/Timing	Responsible Monitoring Party	Compliance Action
site project manager to confirm that noise measures and practices (including construction hours, neighborhood notification, posted signs, etc.) are completed.			



## 6.0 Determination and Preparers

### CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE FEE DETERMINATION

#### (Fish and Game Code Section 711.4, Statutes of 2006 – SB 1535)

- [X] It is hereby found that this project involves no potential for any adverse effect, either individual or cumulatively, on wildlife resources and that a “Certificate of Fee Exemption” shall be prepared for this project.
- [ ] It is hereby found that this project could potentially impact wildlife, individually or cumulatively, and therefore, fees in accordance with Section 711.4(d) of the Fish and Game Code shall be paid to the County Clerk.

#### **Report Preparers**

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##### Technical Consultants

##### Biological Resources Report

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Mr. Korey Klutz  
Phone: 760-492-3342

##### Historic Evaluation Report

Heritage Architecture & Planning  
633 Fifth Avenue,  
San Diego, CA 92101

##### Preliminary Geotechnical and Infiltration Testing Report

Geotechnical Exploration, Inc.  
7420 Trade Street,  
San Diego, CA 92121

**Storm Water Management Plan (SWMP)**

Sowards & Brown Engineering, Inc.  
2187 Newcastle Avenue, Suite 103  
Cardiff, CA 92007

**Vehicle Miles Traveled (VMT) Analysis Technical Memorandum**

Chen Ryan Associates  
3900 Fifth Avenue, Suite 310  
San Diego, CA 92103

## 7.0 Sources Consulted

**Aesthetics****California Department of Transportation (Caltrans)**

2020 Scenic Highways. <https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways>.

**Del Mar, City of**

1985 The Community Plan for the City of Del Mar Community Plan.

2017 Citywide Design Guidelines.

<https://www.delmar.ca.us/DocumentCenter/View/3318/City-Council-Adopted-Design-Guidelines-PDF?bidId=>.

**Agricultural/Forest Resources****State of California, Department of Conservation**

2016 California Important Farmland Finder. <https://maps.conservation.ca.gov/dlrp/ciff/>.

**Air Quality****Chen Ryan Associates**

2020 La Atalaya Del Mar – Vehicle Miles Traveled (VMT) Analysis Technical Memorandum. May 1.

**Office of Environmental Health Hazard Assessment (OEHHA)**

2015 Air Toxics Hot Spots Program Guidance Manual for the Preparation of Risk Assessments (Guidance Manual), February.

**RECON Environmental, Inc.**

2020 Air Quality Analysis for the La Atalaya Project. July 6.

**San Diego Air Pollution Control District (SDAPCD)**

2016 *Resolution Adopting Amended Rule 20.1 – New Source Review – General Provisions; Rule 20.2 – New Source Review – Non-Major Stationary Sources; Rule 20.3 – New Source Review – Major Stationary Sources And Prevention of Significant Deterioration (PSD) Stationary Sources; Rule 20.4 – New Source*

*Review – Portable Emission Units; and Rule 20.6 – Standards for Permit to Operate Air Quality Analysis, of Regulation II of the Rules and Regulations of the San Diego Air Pollution Control District. Resolution Number 16-041. April 27.*

**Biological Resources**

Del Mar, City of

2004 Public Tree Policy Manual. <https://www.delmar.ca.us/DocumentCenter/View/264>.

2020 Municipal Code Section 23.50. Revised December.

Klutz Biological Consulting

2020 Biological Resources Report. September 21.

**Cultural Resources**

RECON Environmental, Inc.

2020 Results of Historical Resources Survey for the La Atalaya Subdivision Project, Del Mar, California. March 30.

Heritage Architecture & Planning

2020 Historic Evaluation Report. March 12.

**Energy**

Southern California Association of Governments (SCAG)

2016 Regional Transportation Plan/Sustainable Communities Strategy.  
<http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS.pdf>.

**Geology and Soils**

2020 Preliminary Geotechnical and Infiltration Testing Report for the La Atalaya Project. June 18.

**Greenhouse Gas Emissions**

California Air Pollution Control Officers Association (CAPCOA)

2008 CEQA & Climate Change, Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act, January.

RECON Environmental, Inc.

2020 Greenhouse Gas Analysis for the La Atalaya Project. July 6.

**Hazards/Hazardous Materials**

California Department of Forestry and Fire Protection (CAL FIRE)

2009 Very High Fire Hazard Severity Zones  
<https://gis.data.ca.gov/datasets/789d5286736248f69c4515c04f58f414>.

EnvirStor

2020 Hazardous Waste and Substances List (Cortese).  
[https://www.envirostor.dtsc.ca.gov/public/map/?global\\_id=38330005](https://www.envirostor.dtsc.ca.gov/public/map/?global_id=38330005).

**Hydrology and Water Quality**

Del Mar, City of

- 2016 Best Management Practices Design Manual.  
<https://www.delmar.ca.us/DocumentCenter/View/2597/BMP-Design-Manual?bidId=>.

Sowards & Brown Engineering, Inc.

- 2019 Storm Water Management Plan (SWMP). September 3.

**Mineral Resources**

California Department of Conservation

- 1996 Mineral Lands Classification.

**Noise**

California Department of Transportation (Caltrans)

- 2013 Technical Noise Supplement.

**Public Services**

Del Mar, City of

- 2016a Fire Department. City of Del Mar. <http://www.delmar.ca.us/134/Fire-Department>.
- 2016b Sheriff's Department. City of Del Mar. <http://www.delmar.ca.us/162/Sheriffs-Department>.

**Recreation**

San Diego Association of Governments (SANDAG)

- 2019 Demographic and Socioeconomic Estimates Jurisdiction Del Mar. San Diego, CA.

Del Mar, City of

- 2020 Del Mar 6<sup>th</sup> Cycle Housing Element Update. Draft Environmental Impact Report.

**Transportation**

Chen Ryan

- 2020 Vehicle Miles Traveled (VMT) Analysis Technical Memorandum. June 2.

San Diego Association of Governments (SANDAG)

- 2002 (Not So) Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region.

**Utilities**

Del Mar, City of

- 2020 Del Mar 6<sup>th</sup> Cycle Housing Element Update. Draft Environmental Impact Report.

**Santa Fe Irrigation District**

2019 District at a Glance. Retrieved from Santa Fe Irrigation District:  
<https://www.sfidwater.org/174/District-at-a-Glance>.

**Wildfire**

California Department of Forestry and Fire Protection (CAL FIRE)

2009 Very High Fire Hazard Severity Zones  
<https://gis.data.ca.gov/datasets/789d5286736248f69c4515c04f58f414>.

**ATTACHMENTS**  
**Under Separate Cover**