Draft Initial Study/Environmental Checklist and Mitigated Negative Declaration for the Blue Wave Hotel & Residences Project Imperial Beach, California

Prepared for
City of Imperial Beach
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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 Blue Wave Hotel & Residences project, which would construct an approximately 73,447-square-foot multi-use facility at 550 Highway 75 in Imperial Beach, California.

The IS/MND includes the following components:

- A Draft MND and the formal findings made by the City of Imperial Beach (City) that the project would not result in any significant effects on the environment with the incorporation of noise mitigation, 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 19 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. The analysis in this IS Checklist supports the conclusion that the project would not result in significant environmental impacts with the incorporation of mitigation; therefore, an 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 Council will consider any comments received on the IS/MND when deciding whether to adopt the IS/MND.

2.0 Draft Mitigated Negative Declaration

Project Name: Blue Wave Hotel & Residences

Project Location: The project is located at 550 Highway 75 on an approximately 1.27-acre lot in the city of Imperial Beach, California. Access to the project site is provided via Highway 75 as well as 7th Street (Assessor's Parcel Numbers 625-140-08-00, 626-070-33-00, and 626-070-57-00).

Project Description: The Blue Wave Hotel & Residences project (project) consists of the development of an approximately 73,447-square-foot multi-use facility located at 550 Highway 75 in Imperial Beach, California. The facility would consist of a Z-shaped, four-story building containing 47 hotel rooms and 51 apartment units along the northeastern perimeter of the site. In addition, the project would construct a two-story building with 6,680 square feet of office/shop/restaurant space adjacent to Highway 75. Other amenities would include a courtyard, a 765-square-foot fitness building, a pool, and deck. Access to the site would be from Highway 75, as well as a one-way exit to 7th Street.

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 Imperial Beach has determined that the project will not have a significant effect on the environment.

Tyler Foltz

Signature of Lead Agency Representative

4/30/19

Date

3.0 Project Description

1. Project:

Blue Wave Hotel & Residences

2. Lead Agency:

City of Imperial Beach
825 Imperial Beach Boulevard
Imperial Beach, CA 91932

3. Contact Person and Phone Number:

Jim Nakagawa, AICP
City Planner
Community Development Department
City of Imperial Beach
825 Imperial Beach Boulevard
Imperial Beach, CA 91932
(619) 628-1355
jnakagawa@imperialbeachca.gov

4. Project Location:

550 Highway 75, Imperial Beach, CA 91932.

5. Project Applicant/Sponsor:

Blue Wave Enterprise LLC

6. General Plan Designation:

C/MU-1 General Commercial & Mixed Use

7. Zoning:

C/MU-1 General Commercial & Mixed Use

8. Description of Project:

The project involves the construction of an approximately 73,447 -gross-square-foot multi-use facility on three parcels located at 550 Highway 75 in Imperial Beach, California (Figures 1 to 3). The facility would include a four-story Z-shaped hotel/apartment building that follows the northern perimeter of the site and a two-story rectangular restaurant building along the southwestern perimeter (Figure 4). Overall, the project would provide 40,149 square feet of residential dwelling unit space (51 units), 18,148 square feet of hotel units (47 units), 1,800 square feet of courtyard patio space, 4,306 square feet of a pool

terrace, 6,680 square feet of office/shop/restaurant space, 21,995 square feet of interior and exterior corridor, trash, and stairway/elevator space, 765 square feet of fitness space in the east building, and 1,768 square feet of outdoor deck space (Table 1). The project would include 47 hotel rooms and 51 apartments.

Table 1
Proposed Uses

Use	Square Feet	Units
Residential	40,149	51
Hotel	18,148	47
Courtyard Patio	1,800	-
Pool Terrace	4,306	-
Office/Shop/Restaurant	6,675	-
Deck	1,768	-
East Building Fitness	765	-
Exterior Corridor Space/Stair & Elevator/Trash Storage	14,325	-
Interior Corridor Space/Stair & Elevator/Trash Storage	7,670	-

The residential component would consist of 30 one-bedroom apartments and 21 two-bedroom apartments, for a total of 51 dwelling units. The third and fourth floors of the facility would consist only of residential apartments and studios, while 11 one-bedroom units would be located on the second floor. A pool would be provided to serve the residential component of the project and may include occasional outdoor daytime events such as birthday parties.

The hotel area would consist of three unit types: micro, standard, and deluxe. The first and second floors of the facility would contain 10 and 9 micro units, respectively. In addition, the first and second floors would both contain 10 standard units and 4 deluxe units, while a manager's unit would be located on the first floor. The total hotel dwelling unit count would be 47 units.

The office/shop/restaurant space would consist of a two-story building, totaling 6,680 square feet. The first floor would contain a lobby, front desk/reception area, and office space, in addition to a lounge seating area, a kitchen and associated pantry area, as well as restrooms. A roll-up wall would be located at the westerly end of the lounge area, which would provide access to a 1,800-square-foot outdoor courtyard patio area. The second floor would consist of a bar area and associated storage room, a lounge, office space, and restrooms. In addition, a 1,768-square-foot deck area would be constructed on the second floor. Entertainment, such as music, may occur in the outdoor patio area at the restaurant until approximately 9:00 p.m.

Access to the project site would be provided via a right-in/right-out un-signalized driveway from Highway 75, with a secondary outbound access provided to 7th Street. The 17,138-square-foot surface parking lot would contain both hotel and residential parking spaces.

The surface parking lot would consist of 20 standard spaces, 2 ADA (Americans with Disabilities Act) compliant handicap spaces, and 4 motorcycle spaces for hotel parking, and 2 electric-vehicle spaces for apartment parking. A 40,750-square-foot below-grade parking structure would be constructed, containing designated spaces for both hotel guests and residents. The hotel parking would consist of 4 motorcycle, 2 handicap, 4 electric-vehicle, and 17 standard spaces. The residential parking would consist of 5 motorcycle, 2 handicap, 3 tandem, 6 electric-vehicle, and 45 standard parking spaces. A total of 106 parking spaces would be provided.

The project features also include an array of Transportation Demand Management (TDM) measures. These include public transportation passes for project employees, shuttle for military personnel to and from the base, general public and resident bicycle racks, residential bicycle storage, alternative transportation pick-up zones, bus stop proximity, flex parking for the hotel, shuttle from adjacent parking lot, and discounts with proof of public/alternative transportation.

The project site would contain approximately 8,606 square feet of landscaped area. The northern border of the project site would contain a bio-swale area, consisting of a combination of small tress, low shrubs, and/or ground covers. Other landscaped areas throughout the project site would contain pre-cast planter/pots with low shrubs, small scale trees, medium scale trees, specimen trees, synthetic lawn surfaces, a water feature, and a hedge living wall. In addition, the landscaping along the northern border would be designed to ensure privacy with the adjacent residential units to the north. Similarly, the retaining wall ramp along the east property would be six feet in height and plantings will occur at select areas at the base of the wall to provide screening.

The building height of the office/shop/restaurant space would be 40 feet. The building architectural style would be modern, with the primary colors including grays and whites exterior stucco, and accent colors including dark brown metal wall panels and a royal blue metal roof. Landscaping would be provided throughout the development, with planters located in interior areas, a bioswale and medium trees along the northern perimeter, a living hedge wall along the eastern perimeter, smaller trees along the highway frontage, and specialized planting demarcating main project entrance.

Due to the inclusion of subterranean parking, the project includes export of soils. More specifically, 17,500 cubic yards would be exported to an approved site. In addition, the project grading phase would include the demolition of the two existing residential structures on 7th Street. All utility improvements would be limited to the site, with the exception of connections made to utilities existing within Highway 75 and to the sewer line directly north.

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

The project site includes a triangular vacant lot that contains ornamental landscaping, as well as a single-family residence on 7th Street. The site is surrounded by single-family residences and restaurant uses to the east, Palm Avenue/CA-75 to the south and west, and a multi-family residential development to the north.

10. Required Approvals:

Site Plan Review
Conditional Use Permit
Vesting Tentative Map
Coastal Development Permit
Design Review Case

11. Other Required Agency Approvals or Permits Required:

Coastal Development Permit to be reviewed by the California Coastal Commission

12. Summary of Environmental Factors Potentially Affected:

Based upon the evaluation presented in the following IS/ND, it is concluded that the project would not result in any potentially significant adverse environmental impacts to the following resource areas:

☐ Aesthetics	☐ Agriculture and Forestry Resources	☐ Air Quality
☐ Biological Resources	☒ Cultural Resources	☐ Geology and Soils
☐ Greenhouse Gas Emissions	☒ Hazards and Hazardous Materials	☐ Hydrology and Water Quality
☐ Land Use and Planning	☐ Mineral Resources	☒ Noise
	☐ Population and Housing	☐ Public Services
☐ Recreation	☐ Transportation/Traffic	☐ Tribal Cultural Resources
☐ Utilities and Service Systems	☐ Mandatory Findings of Significance	

DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION shall be prepared.

☒ I find that, although the proposed project might have a significant effect on the environment, there would not be a significant effect in this case because revisions in the project have been made, or agreed to, by the project proponent. A MITIGATED NEGATIVE DECLARATION shall be prepared.

☐ I find that the proposed project might have a significant effect on the environment and/or deficiencies exist relative to the City's General Plan Quality of Life Standards, and the extent of the deficiency exceeds the levels identified in the City's Environmental Quality Regulations pursuant to Zoning Code Article 47, Section 33-924 (b), and an ENVIRONMENTAL IMPACT REPORT shall be required.

☐ I find that the proposed project might have a "potentially significant impact" or "potentially significant unless mitigated impact" on the environment, but at least one effect: (a) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (b) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT shall be required, but it shall analyze only the effects that remain to be addressed.

☐ I find that, although the proposed project might have a significant effect on the environment, no further documentation is necessary because all potentially significant effects: (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project.

Project Location

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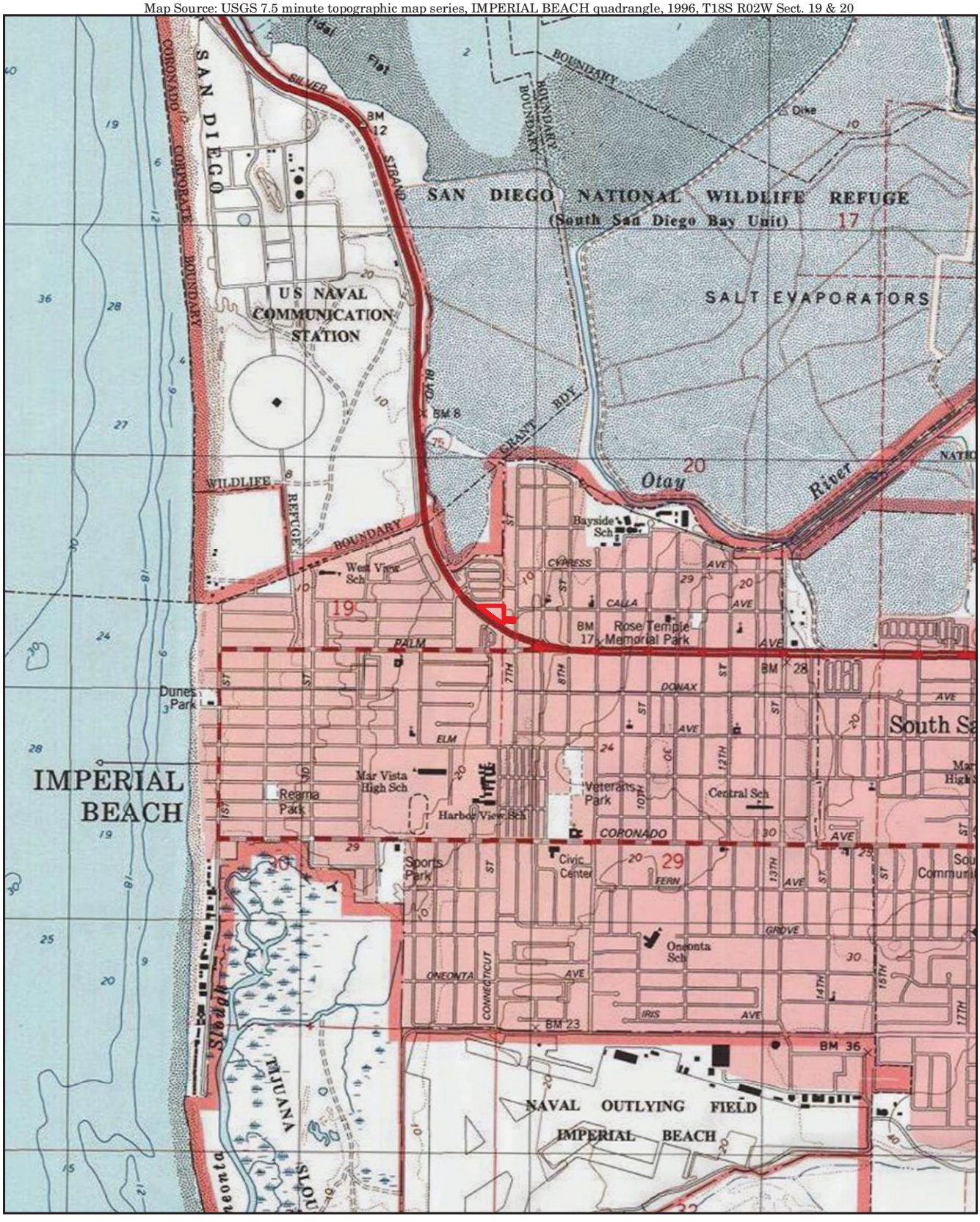
FIGURE 1

Regional Location

Map Source: USGS 7.5 minute topographic map series, IMPERIAL BEACH quadrangle, 1996, T18S R02W Sect. 19 & 20



Project Boundary

FIGURE 2
Project Location on USGS Map

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Image Source: Nearmap (flown June 2018)

Project Boundary

FIGURE 3

Project Location on Aerial Photograph

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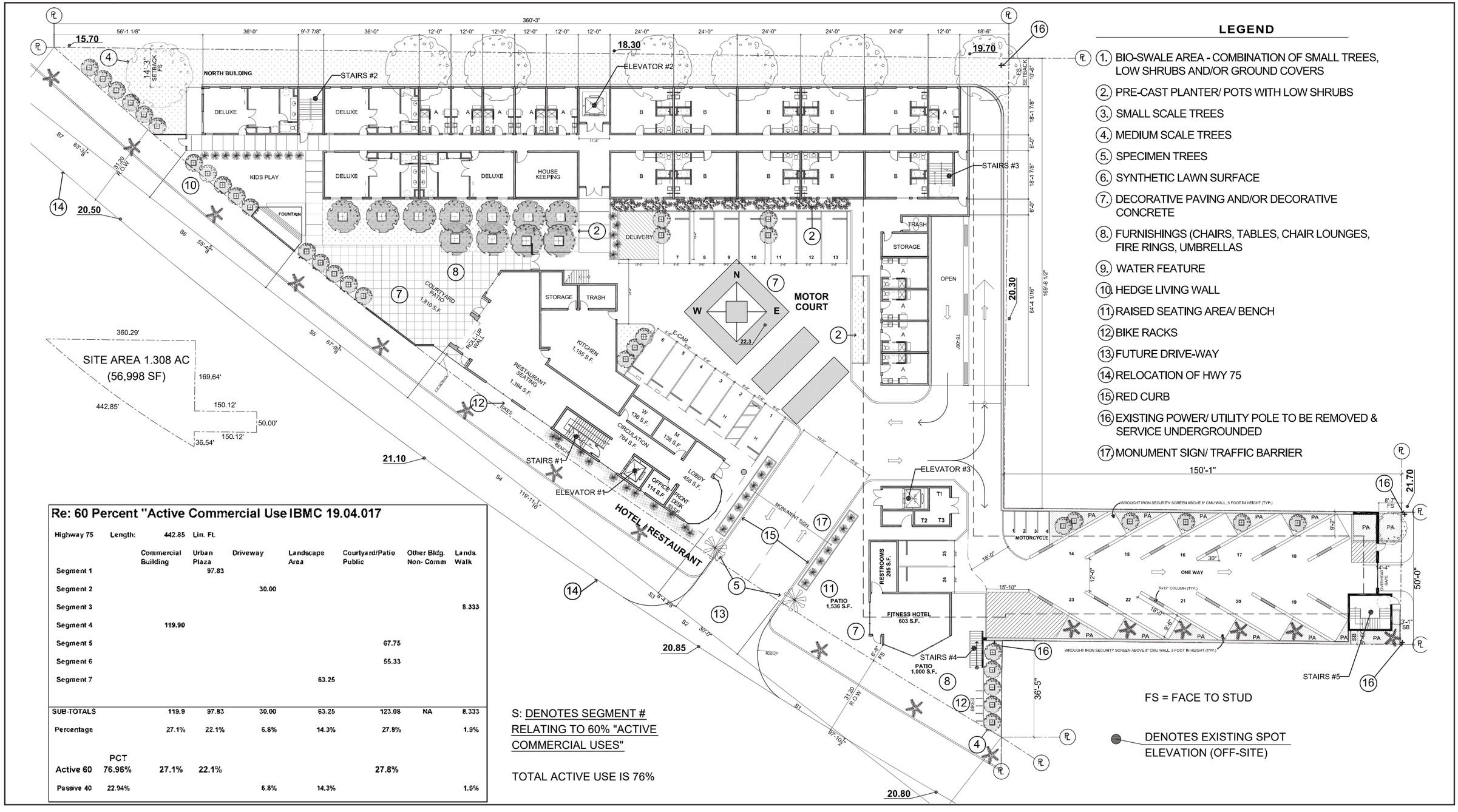
Map Source: Hunsaker and Associates



LEGEND

1. BIO-SWALE AREA - COMBINATION OF SMALL TREES, LOW SHRUBS AND/OR GROUND COVERS
2. PRE-CAST PLANTER/ POTS WITH LOW SHRUBS
3. SMALL SCALE TREES
4. MEDIUM SCALE TREES
5. SPECIMEN TREES
6. SYNTHETIC LAWN SURFACE
7. DECORATIVE PAVING AND/OR DECORATIVE CONCRETE
8. FURNISHINGS (CHAIRS, TABLES, CHAIR LOUNGES, FIRE RINGS, UMBRELLAS
9. WATER FEATURE
10. HEDGE LIVING WALL
11. RAISED SEATING AREA/ BENCH
12. BIKE RACKS
13. FUTURE DRIVE-WAY
14. RELOCATION OF HWY 75
15. RED CURB
16. EXISTING POWER/ UTILITY POLE TO BE REMOVED & SERVICE UNDERGROUNDED
17. MONUMENT SIGN/ TRAFFIC BARRIER

Re: 60 Percent "Active Commercial Use IBMC 19.04.017

Highway 75 Length: 442.85 Lin. Ft.

		Commercial Building	Urban Plaza	Driveway	Landscape Area	Courtyard/Patio Public	Other Bldg. Non- Comm	Lands. Walk
Segment 1			97.83					
Segment 2				30.00				
Segment 3								8.333
Segment 4		119.90						
Segment 5						67.75		
Segment 6						55.33		
Segment 7					63.25			
SUB-TOTALS		119.9	97.83	30.00	63.25	123.08	NA	8.333
Percentage		27.1%	22.1%	6.8%	14.3%	27.8%		1.9%
	PCT							
Active 60	76.96%	27.1%	22.1%			27.8%		
Passive 40	22.94%			6.8%	14.3%			1.9%

S: DENOTES SEGMENT # RELATING TO 60% "ACTIVE COMMERCIAL USES"

TOTAL ACTIVE USE IS 76%

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FIGURE 4
Site Plan

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?	☐	☐	☒	☐
b. Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☒	☐
c. Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	☒	☐
d. Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

EXPLANATIONS:

a: Less Than Significant Impact

The Design Element of the City of Imperial Beach General Plan and Local Coastal Plan identifies views of the Pacific Ocean as a scenic resource (City of Imperial Beach 2015). Public viewpoints near the project site include points along Highway 75, as well as along 7th Street, to the east of the project site.

While the project is approximately 0.75 mile from the Pacific Ocean coastline, views of the Pacific Ocean from the project viewshed are limited due to the flat terrain and existing development between the project site and the Pacific Ocean. Ornamental landscaping and existing homes also block views of the Pacific Ocean from public vantage points along the roadways. There are no other public viewing points, such as open space or trail networks, within the project vicinity. Construction of the project would not impede views of the Pacific Ocean from surrounding public viewing areas. Therefore, the project would not have a substantial adverse effect on a scenic vista, and impacts would be less than significant.

b: Less Than Significant Impact

There are no trees, naturally occurring rock outcroppings, or designated historic buildings within the project site. According to the California Department of Transportation (Caltrans) State Scenic Highway Program Map, the closest state scenic highway is Highway 75, of which the project site is adjacent. However, the portion of roadway that has been designated as a scenic highway begins approximately one-quarter mile to the northwest of

the project site (California Department of Transportation [Caltrans] 2018). Therefore, the project would not substantially damage scenic resources within a state scenic highway. Impacts would be less than significant.

c: Less Than Significant Impact

The project site is currently a vacant lot as well as a single-family residence, with minimal amounts of ornamental landscaping scattered throughout the site. The project site is surrounded by single- and multi-family residential and commercial development.

Due to the presence of multi-family residential development to the north associated with the Bayside Landing Development, residential area to the east, and commercial development surrounding the project site, construction of the project would not introduce new features that would contrast with the visual character of the surrounding area. Project features include landscaping along the northern border designed to provide visual screening and ensure privacy with the adjacent residential units to the north. In addition, the six-foot-high retaining wall along the east property would include plantings at select areas at the base of the wall to provide screening.

With the implementation of the project, the visual quality of the site would improve from a vacant lot surrounded by development (see Figure 3) to a developed site consistent with surrounding development. Refer to the visual simulation in Figure 5. Impacts would be less than significant.

d: Less Than Significant Impact

Any exterior lighting included with the project site would be designed in compliance with Imperial Beach Municipal Code Section 19.56.030 (the City Zoning Ordinance Lighting Regulations), which requires all lighting be adjusted to reflect light away from adjacent properties, and be shielded or directed so as to not cause a major disturbance to adjacent properties. While the project would include new sources of lighting, the project site is located in an urban environment, and would not contribute substantially to a new source of light or glare. Therefore, the project would not produce a new source of light and glare that would adversely affect day or nighttime views, and impacts would be less than significant.

Map Source: M + C CORPORATION

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FIGURE 5
Visual Simulation

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?	☐	☐	☐	☒
b. Conflict with existing zoning for agricultural use, or a Williamson Act Contract?	☐	☐	☐	☒
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])?	☐	☐	☐	☒
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
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?	☐	☐	☐	☒

EXPLANATIONS:

a – e: No Impact

The project site and surrounding properties are not identified as prime farmland, unique farmland, or farmland of statewide importance. The Farmland Mapping and Monitoring Program classifies the project site and surrounding properties as "urban and built up land" (California Department of Conservation 2016). The project site and surrounding properties are not zoned for agricultural uses and are not subject to a Williamson Act contract. Similarly, the project site and surrounding properties are not zoned as forest land or

timberland and do not include any forest land or timberland. Therefore, the project would have no impact on agricultural resources, forest land, or timberland.

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?	☐	☐	☒	☐
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☐	☒	☐
c. 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	☐	☐	☒	☐
d. Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
e. Create objectionable odors affecting a substantial number of people?	☐	☐	☒	☐

EXPLANATIONS:

a: Less Than Significant Impact

The project is located within the San Diego Air Basin (SDAB), which is under the jurisdiction of the San Diego Air Pollution Control District (SDAPCD). Air districts are tasked with regulating emissions such that air quality in the basin does not exceed National or California Ambient Air Quality Standards (NAAQS and CAAQS); where NAAQS and CAAQS represent the maximum levels of background pollution considered safe, with an adequate margin of safety, to protect the public health and welfare. NAAQS and CAAQS have been established for six common pollutants of concern known as criteria pollutants, which include ozone, carbon monoxide (CO), sulfur dioxide (SO_2), nitrogen dioxide (NO_2), lead (Pb), and respirable particulate matter (PM_{10} and $PM_{2.5}$). The SDAB is currently classified as a federal and state non-attainment area for ozone. The SDAPCD prepared an air quality plan, the 2016 Regional Air Quality Strategy (RAQS), to identify

feasible emission control measures intended to progress toward attaining the state standard for ozone. Reducing ozone concentrations is achieved by reducing the precursors to the photochemical formation of ozone—volatile organic compounds (VOC) and oxides of nitrogen (NO_X).

The growth forecasting for the RAQS is based in part on San Diego Association of Governments (SANDAG) growth projections and the land uses established by local general plans. If a project is consistent with land use designated in the local general plan, it can normally be considered consistent with the RAQS.

The project site is zoned C/MU-1 General Commercial and Mixed Use. The project consists of a mixed use development, consisting of residential and hotel uses along with an office/retail/restaurant space. The project would, therefore, be consistent with the City General Plan and Local Coastal Plan land use designation and SANDAG growth projections. Emissions associated with short-term construction activities would be localized and would not affect RAQS compliance. The project would not increase the long-term emissions generated within the City. Therefore, the project would comply with the assumptions used in the development of the RAQS and would not conflict with or obstruct implementation of the applicable air quality plan, and impacts would be less than significant.

b: Less Than Significant Impact

NAAQS and CAAQS have been established for six criteria pollutants (ozone, CO, SO_2, NO_2, lead, and particulate matter). The City has not adopted air quality significance thresholds for these pollutants, and the SDAPCD 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 stationary sources 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 per hour)	Emission Rate (pounds per day)	Emission Rate (tons per year)
NO_X	25	250	40
SO_X	25	250	40
CO	100	550	100
PM_{10}	--	100	15
Lead	--	3.2	0.6
ROG[1]	--	250	--
$PM_{2.5}$	--	67	10

SOURCE: SDAPCD, Rules 20.1, 20.2, 20.3 (SDAPCD 2016)
[1]The reactive organic gases (ROG) threshold is based on federal General Conformity de minimis levels for ozone precursors.
NOx = oxides of nitrogen; SOx = oxides of sulfur; CO = carbon monoxide;
PM_{10} = 10-micron particulate matter; ROG = reactive organic gas;
$PM_{2.5}$ = 2.5-micron particulate matter

The project would result in short-term emissions from construction and long-term emissions associated with project operation. Construction and operational emissions associated with the project were modeled using CalEEMod version 2016.3.2 (California Air Pollution Control Officers Association [CAPCOA] 2017; Appendix A), which incorporates current air emission data. Planning methods, protocol, modeling methodology, and assumptions are summarized below.

Construction Emissions

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

- demolition
- fugitive dust from grading activities;
- equipment exhaust;
- off-gassing from architectural coatings (paints, etc.) and paving; and
- vehicle trips by workers, delivery trucks, and material-hauling trucks.

The specific construction schedule has not been developed at this time; thus, specific construction phasing and equipment parameters were estimated based on project survey data incorporated in the CalEEMod program.

Table 3 shows the total projected construction maximum daily emission levels for each criteria pollutant. The CalEEMod output files for construction emissions for the project are contained in Appendix A.

Table 3
Summary of Maximum Build-out Construction Emissions
(pounds per day)

	Pollutant					
	ROG	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Demolition	2	23	15	0	2	1
Site Preparation	2	20	8	0	7	4
Grading/Excavation	2	27	9	0	6	3
Building Construction	3	17	15	0	1	1
Paving	1	8	9	0	1	0
Architectural Coatings	9	2	2	0	0	0
Maximum Daily Emissions	**9**	**27**	**15**	**0**	**7**	**4**
Significance Threshold	*250*	*250*	*550*	*250*	*100*	*67*

SOURCE: Appendix A
SDAPCD, Rules 20.2 and 20.3
ROG = reactive organic gas; NOx = oxides of nitrogen; CO = carbon monoxide;
SOx = oxides of sulfur; PM_{10} = 10-micron particulate matter;
$PM_{2.5}$ = 2.5-micron particulate matter

Standard dust control measures would be implemented as a part of project construction in accordance with SDAPCD rules and regulations. Fugitive dust emissions were calculated using CalEEMod default values, and did not take into account the required dust control measures. Thus, the emissions shown in Table 3 are conservative.

To assess the significance of the air quality emissions resulting from construction of the project, construction emissions were compared to the significance thresholds shown in Table 3. As shown, maximum daily construction emissions associated with the project are projected to be less than 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. Therefore, as project construction emissions would be well below these limits, construction emissions would not result in regional emissions that would exceed the NAAQS or CAAQS or contribute to existing violations. Construction related air quality impacts would be less than significant.

Operational Emissions

Operation of the project would result in long-term emissions from mobile and area sources. Mobile emissions were calculated based on the vehicle type and the trip rate for each land use. Based on information from the project Traffic Impact Analysis (Appendix B-1), the project would generate 1,316 trips prior to accounting for mixed use and by-pass trip reductions. Vehicle emission factors and fleet mix were based on regional averages from the California Air Resources Control Board (CARB) Emission Factors 2014 model. Based on regional data compiled by CARB as part of Emission Factors 2014 model, the average regional trip length for all trips in San Diego County in year 2020 is 5.6 miles (CARB 2014). Default vehicle emission factors were used. Area emissions include emissions from the use of landscaping equipment, consumer products (aerosols, cleansers, etc.), and architectural coatings (e.g., paint). Area sources were calculated based on regional use factors.

Table 4 provides a summary of the operational emissions generated by the project. CalEEMod output files for operation of the project are contained in Appendix A.

Table 4
Summary of Maximum Build-out Operational Emissions (pounds per day)

	Pollutant					
Emissions Sources	ROG	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Area Sources	2	0	4	0	0	0
Energy Sources	0	1	0	0	0	0
Mobile Sources	2	5	12	0	2	1
Total	**4**	**6**	**16**	**0**	**2**	**1**
Significance Threshold	*250*	*250*	*550*	*250*	*100*	*67*

SOURCE: Appendix A
NOTE: Totals may vary due to independent rounding.
ROG = reactive organic gas; NOx = oxides of nitrogen; CO = carbon monoxide; SOx = oxides of sulfur; PM_{10} = 10-micron particulate matter; $PM_{2.5}$ = 2.5-micron particulate matter

As shown in Table 4, operation of the project would not exceed the applicable regional emissions thresholds. Therefore, as operation emissions would be below these limits, operation emissions would not result in regional emissions that would exceed the NAAQS or CAAQS or contribute to existing violations. Therefore, the project would result in a less than significant impact.

c: Less Than Significant Impact

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

As shown in Tables 3 and 4, emissions of ozone precursors (ROG and NO_X), PM_{10}, and $PM_{2.5}$ from construction and operation of the project would be below the applicable thresholds. Therefore, the project would not result in a cumulatively considerable net increase in emissions of ozone, PM_{10}, or $PM_{2.5}$, and impacts would be less than significant.

d: Less Than Significant Impact

Air quality sensitive receptors are associated with various land uses such as residences, schools, or other facilities that may house individuals with health conditions who would be adversely impacted by poor air quality. Sensitive receptors (residences) are in close proximity to the project site. Residential uses are located north and east of the project site, and a recreational vehicle (RV) park is located south of the project site.

Diesel Particulate Matter–Construction

Construction-related activities would result in short-term emissions of diesel particulate matter (PM) exhaust emissions from off-road, heavy-duty diesel equipment. Diesel PM has been identified by the CARB as a carcinogen. Cancer risk is dependent on the exposure concentration (dose) and duration of exposure. Generation of diesel PM from construction projects typically occurs in a single area for a short period. The risks associated with exposure to diesel PM is typically evaluated based on a lifetime of chronic exposure. According to the Office of Environmental Health Hazard Assessment (OEHHA), health risk assessments are based on a 30-year exposure period (OEHHA 2015). However, construction of the project would be temporary and short term, and there would therefore be a short exposure time much less than 30 years. Due to the short exposure period and the implementation of the U.S. Environmental Protection Agency (EPA) and CARB requirements for cleaner fuels, diesel engine retrofits, and new low-emission diesel engine types, diesel PM generated by project construction is not expected to affect nearby residences, and impacts would be less than significant.

Diesel Particulate Matter–Freeways and Heavily Traveled Roadways

CARB has provided guidelines for the siting of land uses near heavily traveled roadways. The CARB guidelines indicate that siting new sensitive land uses within 500 feet of a freeway or urban roads with 100,000 or more vehicles per day should be avoided when possible (CARB 2005). The project site is located adjacent to Highway 75, however, future traffic volumes on Highway 75 in the vicinity of the project are projected to be 31,930 average daily traffic (ADT). The project would not place sensitive receptors within 500 feet of a roadway carrying 100,000 vehicles per day. Therefore, once operational, the project would not expose sensitive receptors to substantial concentrations of diesel PM, and impacts would be less than significant.

Carbon Monoxide Hot Spots

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. The Caltrans Project-Level Carbon Monoxide Protocol (CO Protocol) screening procedures have been utilized to determine if the project could potentially result in a CO hot spot (U.C. Davis Institute of Transportation Studies 1997). As indicated by the CO Protocol, CO hot spots occur nearly exclusively at signalized intersections operating at level of service (LOS) E or F. Accordingly, the CO Protocol recommends detailed air quality dispersion modeling for projects that may worsen traffic flow at any signalized intersections operating at LOS E or F.

Due to increased requirements for cleaner vehicles, equipment, and fuels, CO levels in the state have dropped substantially. All air basins are attainment or maintenance areas for CO. Therefore, more recent screening procedures based on more current methodologies have been developed. The Sacramento Metropolitan Air Quality Management District developed a screening threshold in 2011, which states that any project involving an

intersection experiencing 31,600 vehicles per hour or more will require detailed analysis. In addition, the Bay Area Air Quality Management District developed a screening threshold in 2010, which states that any project involving an intersection experiencing 44,000 vehicles per hour would require detailed analysis. This analysis conservatively assesses potential CO hot spots using the South Coast Air Quality Management District screening threshold of 31,600 vehicles per hour. Based on the Traffic Impact Analysis for the project, intersection volumes are projected to be well less than 31,600 vehicles per hour. Therefore, the project is not anticipated to result in a CO hot spot and project impacts related to CO hot spots would be less than significant.

e: 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. Therefore, construction of the project is not expected to generate significant objectionable odors affecting a substantial number of people.

Regarding operation of the project, residential, hotel, and retail uses do not typically include operational sources of objectionable odors. The restaurant may generate noticeable odors through the preparation of food. However, the odors from general food preparation are not generally considered objectionable. Additionally, kitchens are required to install ventilation systems that would decrease odor impacts. Therefore, operation of the project is not expected to generate significant objectionable odors affecting a substantial number of people.

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)?	☐	☐	☐	☒

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒
c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
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?	☐	☐	☐	☒
e. Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance?	☐	☐	☐	☒
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?	☐	☐	☐	☒

EXPLANATIONS:

a: No Impact

The project site consists of a vacant lot and a developed lot with a single-family residence. The ornamental vegetation located on the vacant lot does not qualify as sensitive plant species, nor does it provide habitat for designated sensitive species. Additionally, the project site does not provide suitable nesting or foraging habitat due its location within a highly urbanized environment. The project would be constructed within the property boundaries and would not impact any riparian or other habitat community. No impact would occur.

b: No Impact

The project site does not support riparian habitats or other sensitive natural communities. No impact would occur.

c: No Impact

No hydrological features associated with a definable channel or wetland exist within or adjacent to the project site. Therefore, no United States Army Corps of Engineers (USACE) or CDFW jurisdictional areas were identified on the project site. No impact would occur.

d: No Impact

The project site is not part of a regional or local wildlife corridor and does not serve as a nursery site. No impact would occur.

e: No Impact

The project would not conflict with any local policies or ordinances protecting biological resources. No impact would occur.

f: No Impact

The City is located within the designated boundary of the Multiple Species Conservation Program, but is not a participant. The City does not have any other approved local, regional, or state Habitat Conservation Plan. No impact would occur.

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 as defined in §15064.5?	☐	☐	☐	☒
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☐	☒	☐
c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
d. Disturb human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐

EXPLANATIONS:

a: No Impact

The project site consists of a vacant lot on Highway 75 and two residential structures on a lot along 7th Street. The main house was constructed prior to 1953, and the back house was constructed around 2002. The main house is not currently listed on any state, local, or federal historical resource register. Due to previous modifications made to the main house and no known historical significance, the site is not anticipated to meet state or national eligibility criteria (California Code of Regulations Title 14, Section 4852; Section 106 of the National Historic Preservation Act) for listing. Thus, impacts to historical resources are not anticipated to occur.

b: Less Than Significant Impact

The site has been subject to mass grading associated with past development. Consequently, it is not anticipated that archaeological resources exist on-site, nor that excavation during construction would unearth any unknown archaeological resources. Therefore, impacts to archaeological resources would be less than significant.

c: Less Than Significant Impact

Impacts to paleontological resources typically occur during grading activities (excavation) associated with project construction on previously undisturbed land, or redevelopment where much deeper grading in native soil is proposed. According to the Geotechnical Investigation prepared for the project (Construction, Testing & Engineering South 2018; Appendix C), the project site is underlain by Quaternary Older Paralic Deposits (formerly mapped as Bay Point Formation). The Bay Point Formation is assigned a high paleontological resource sensitivity (Deméré and Walsh 1992). This is because the Bay Point Formation has produced large and diverse assemblages of well-preserved marine invertebrate fossils, primarily mollusks. Remains of fossil marine vertebrates (i.e., sharks, rays, and bony fishes) also have been recovered from this rock unit.

Project grading is anticipated to take place within the undocumented artificial fill soils as well as the Quaternary Older Paralic Deposits. As the proposed grading would involve over 10 feet of cuts into Quaternary Older Paralic Deposits for the proposed underground parking and footings, the project could result in significant impacts to unknown subsurface paleontological resources.

Implementation of the following mitigation measures would reduce potential impacts to less than significant levels:

CUL-1 If grading requires cuts deeper than that of the fill soils (i.e., into the Bay Point Formation), the applicant shall retain a qualified paleontologist approved by the City (Project Paleontologist) to create and implement a project-specific plan for monitoring site grading/earth-moving activities.

CUL-2 The project paleontologist retained shall review the approved development plan and grading plan and shall conduct any pre-construction work necessary to render appropriate monitoring and mitigation requirements as appropriate. These requirements shall be documented by the project paleontologist in a Paleontological Resource Impact Mitigation Program (PRIMP). This PRIMP shall be submitted to the City Planning Director for review and approval prior to issuance of a Grading Permit. Information to be contained in the PRIMP, at a minimum and in addition to other industry standard and Society of Vertebrate Paleontology standards, are as follows:

1. Description of the project site and planned grading operations.

2. Description of the level of monitoring required for all earth-moving activities in the project area.

3. Identification and qualifications of the qualified paleontological monitor to be employed for grading operations monitoring.

4. Identification of personnel with authority and responsibility to temporarily halt or divert grading equipment to allow for recovery of large specimens.

5. Direction for any fossil discoveries to be immediately reported to the property owner who in turn will immediately notify the City Planning Director of the discovery.

6. Means and methods to be employed by the paleontological monitor to quickly salvage fossils as they are unearthed to avoid construction delays.

7. Sampling of sediments that are likely to contain the remains of small fossil invertebrates and vertebrates.

8. Procedures and protocol for collecting and processing of samples and specimens.

9. Fossil identification and curation procedures to be employed.

10. Identification of the permanent repository to receive any recovered fossil material. The City must be consulted on the repository/museum to receive the fossil material and a written agreement between the property owner/developer and the repository must be in place prior to site grading.

11. All pertinent exhibits, maps, and references.

12. Procedures for reporting of findings.

13. Identification and acknowledgement of the developer for the content of the PRIMP as well as acceptance of financial responsibility for monitoring, reporting and curation fees.

All reports shall be signed by the project paleontologist and all other professionals responsible for the report's content (e.g., professional geologist), as appropriate. Copies of the report(s) shall be submitted to the City Planning Director, along with a copy of this condition and the grading plan for appropriate case processing and tracking. In addition, the applicant shall submit proof of hiring (i.e., copy of executed contract, retainer agreement, etc.) a project paleontologist for the in-grading implementation of the PRIMP.

CUL-3 Prior to grading final inspection, the applicant shall submit to the City Planning Director one copy of the Paleontological Monitoring Report prepared for site grading operations at this site. The report shall be certified by the professionally qualified paleontologist responsible for the content of the report. The report shall contain a report of findings made during all site grading activities and an appended itemized list of fossil specimens recovered during grading (if any) and proof of accession of fossil materials into the pre-approved museum repository. In addition, all appropriate fossil location information shall be submitted to the San Diego County Natural History Museum, at a minimum, for incorporation into their regional locality inventories.

d: Less Than Significant Impact

No dedicated cemetery or human remains are known to be present on-site, and the potential for encountering human remains during construction activities of the project is very low. In the event that human remains are discovered, construction activities would be halted until the coroner is contacted, as well as any applicable Native American tribes consistent with Health and Safety Code Section 7050.5 and Public Resources Code Sections 5097.98 and 5097.993. The California Native American Graves Protection and Repatriation Act (2001) and the federal Native American Graves Protection and Repatriation Act (1990) require any remains or associated cultural items be treated with dignity and, as necessary, be repatriated. Therefore, impacts to human remains would be less than significant.

4.6 Geology and Soils

Would the project:

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Expose people or structures to 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?	☐	☐	☒	☐
ii. Strong seismic ground shaking?	☐	☐	☒	☐
iii. Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv. Landslides?	☐	☐	☐	☒
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
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?	☐	☐	☒	☐
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	☐	☐	☒	☐

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?	☐	☐	☐	☒

EXPLANATIONS:

a.i. Less Than Significant Impact

According to the Geotechnical Investigation prepared for the project (Construction, Testing & Engineering South 2018; Appendix C), the project site is not located within a State of California Alquist-Priolo fault zone or a City Special Studies Zone, and there are no known active fault traces that underlie or project towards the project site. Therefore, the risk from fault rupture is low, and impacts related to the exposure of people or structures to rupture of a known earthquake fault would be less than significant.

a.ii. Less Than Significant Impact

The project site is located in the seismically active southern California region. According to the Geotechnical Investigation prepared for the project (Construction, Testing & Engineering South 2018), the closet active regional faults are the Rose Canyon Fault and Coronado Bank, 14 and 17.6 miles away from the project site, respectively. Therefore, the site could be affected by seismic activity as a result of earthquakes on major active faults located throughout the southern California area. The project would utilize proper engineering design, in accordance with California and international building codes and guidelines established by the Structural Engineers Association of California, and would be required to comply with recommendations included in the Geotechnical Investigation prepared for the project (Construction, Testing & Engineering South 2018). In addition, utilization of standard construction practices, to be verified at the building permit stage, would ensure that impacts from regional geologic hazards are minimized. Therefore, impacts related strong seismic shaking would be less than significant.

a.iii. Less Than Significant Impact

Liquefaction is a phenomenon where water-saturated granular soil loses shear strength during strong ground shaking produced by earthquakes. The loss of soil strength occurs when cyclic pore water pressure increases below the groundwater surface. Potential hazards due to liquefaction include the loss of bearing strength beneath structures, possibly causing foundation failure and/or significant settlements and differential settlements.

As discussed in the Geotechnical Investigation prepared for the project (Construction, Testing & Engineering South 2018), a quantitative liquefaction analysis was performed for the project site, due to the presence of groundwater. The potential total liquefaction settlement is estimated to be 1.69 inches and a differential settlement of less than 0.5 inch over a distance of 30 feet (Construction, Testing & Engineering South 2018). The project would utilize proper engineering design, in accordance with California and International building codes and guidelines established by the Structural Engineers Association of California, and would be required to comply with recommendations included in the Geotechnical Investigation prepared for the project. Compliance with these building codes and the Geotechnical Investigation would ensure impacts associated with liquefaction would be less than significant.

a.iv. No Impact

According to the Geotechnical Investigation prepared for the project (Construction, Testing & Engineering South 2018), the site is within an urbanized area considered to be "Marginally Susceptible" to landslides. However, no landslides have been mapped within the project site, and there is no evidence of land sliding based on site reconnaissance. In addition, the project site is relatively flat. As such, landslides are not considered to pose a significant geologic hazard within the project site, and impacts would be less than significant.

b: Less Than Significant Impact

The majority of the site is currently vacant, and being used as a construction staging area. The 7th Street lot currently includes a single-family home with landscaping. Currently, site runoff results in minor soil erosion, as the soils are stabilized by hardscape, landscaping, and weedy vegetation.

The proposed grading would result in a potential for soils to temporarily be unstabilized; however, the project would include best management practices (BMPs). Example construction BMPs include perimeter silt fences and hay bales. Specific BMPs would be determined by the project contractor and engineer based on site-specific conditions. As part of the project, the contractor will monitor the construction BMPs, including conducting routine inspections of disturbed areas to ensure that the BMPs remain intact and effective.

During operations, the project would be required to comply with the Storm Water Quality Management Plan (REC Consultants, Inc. [REC] 2018a; Appendix D), which requires BMPs to control erosion and an on-site storm drain system to control runoff. BMPs require that runoff be directed into pervious areas as possible, and to minimize impervious areas. The runoff would be directed into the on-site stormdrain system, which includes biofiltration, detention of runoff in an underground vault, and outlet into the existing stormdrain system in Highway 75. Thus, operations would not have potential to result in significant soil erosion.

Overall, the project would not result in in substantial soil erosion or the loss of topsoil, and impacts would be less than significant.

c: Less Than Significant Impact

Site preparation and grading activities for the proposed structures would be conducted in conformance with the City's grading ordinance and the project would utilize proper engineering design, in accordance with California and International building codes and guidelines established by the Structural Engineers Association of California, and would be required to comply with recommendations included in the Geotechnical Investigation prepared for the project (Construction, Testing & Engineering South 2018). Adherence to these requirements would avoid or minimize impacts from potential on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse, and impacts would be less than significant.

d: Less Than Significant Impact

According to the Geotechnical Investigation prepared for the project (Construction, Testing & Engineering South 2018), the project site contains Quaternary Previously Placed Fill, which was encountered at the surface of the project site to a maximum depth of approximately 2.5 feet. These soils consist generally of loose to medium dense, slightly moist, light to red brown, silty to clayey fine grained sand. This soil is underlain by Quaternary Older Paralic Deposits, which were encountered beneath the fill and extended to a maximum depth of 43 feet. This soil type generally consisted of stiff to hard, fine sandy clays and clayey sands, as well as medium dense to very dense, slightly moist to wet, gray brown to red brown, silty, fine grained to poorly graded sands with gravel and cobbles, in addition to some interbedded silts.

As discussed in the Geotechnical Investigation (Construction, Testing & Engineering South 2018), the near-surface soil materials are anticipated to exhibit a low expansion potential. However, the clayey soils located at five feet below surface level are anticipated to have a medium expansion potential. As such, the soils within the project site exhibit a low to medium expansion potential.

The project would utilize proper engineering design, in accordance with California and international building codes and guidelines established by the Structural Engineers Association of California, and would be required to comply with recommendations included in the Geotechnical Investigation prepared for the project (Construction, Testing & Engineering South 2018). Excavations would use temporary and/or permanent shoring if necessary and would not affect existing building and development to the east of the site (Construction, Testing & Engineering South 2019). In addition, the recommendations from the project structural engineer have been incorporated in the project design for the foundation requirements for the parking structure and multi-story project improvements. Also, the parking lot over the garage is an elevated slab that will be structural in nature and the project structural engineer will review the parameters. Construction of the underground parking structure would be required to comply with the engineering design requirements of the California and international building codes, as well as the recommendations included in the Geotechnical Investigation prepared for the project (Construction, Testing & Engineering South 2018). Compliance with these building codes

and the Geotechnical Investigation would ensure impacts associated with expansive soils and adjacent properties would be less than significant.

e: No Impact

The project does not propose the use of septic tanks or alternative wastewater disposal systems. No impact would occur.

4.7 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?	☐	☐	☒	☐
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

EXPLANATIONS:

a: Less Than Significant Impact

The City has not adopted a Climate Action Plan or adopted a greenhouse gas (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. The most ambitious reduction target, 80 percent below 1990 levels, corresponds to a 90 percent reduction in statewide business-as-usual emissions. Thus, the guidance identifies project-level thresholds that would correspond to a 90 percent market capture rate, annual emission of 900 metric tons of carbon dioxide equivalent (MT CO_2E). 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_2E would not impede achievement of the state GHG emissions reduction targets codified by AB 32 (2006) and SB 32 (2016), and impacts under CEQA would, therefore, be less than cumulatively considerable.

As this 900 MT CO_2E 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_2E would warrant more detailed conformity analysis for 2020 and 2030 targets.

Annual GHG emissions due to construction and operation of the project were calculated using CalEEMod (CAPCOA 2017) and the assumptions discussed in Section 4.3. The emissions sources include construction (off-road vehicles), mobile (on-road vehicles), area (consumer products [cleansers, aerosols, solvents, etc.], landscape maintenance equipment, and architectural coatings), water and wastewater, and solid waste sources. The project would include a number of Leadership in Energy and Environmental Design (LEED) features that would reduce GHG emissions. This includes the installation of approximately 3,000 square feet of rooftop solar photovoltaic (PV) panels. The average panel is 17.6 square feet thus the project would include installation of 170 solar panels on the roof for sustainable energy. It is not known at this time which brand/model of solar panels would be selected for use in the project. Although some solar panel models have a nameplate generation capacity above 350 watts, the majority of solar panel models generate between 230 and 290 watts, and the average solar panel generates 260 watts[1] (California Solar Initiative 2018). Project solar PV panels were assumed to generate 260 watts per panel. Based on regional solar generation estimates provided in Table AE-2.1 of the CAPCOA's Quantifying Greenhouse Gas Mitigation Measures, solar PV systems in San Diego County typically generate approximately 1,705.6 kilowatts per hour (kWh) per nameplate kW installed (CAPCOA 2010). Thus, project solar panels are anticipated to have an approximate system capacity of 44.2 kW and would generate approximately 75,000 kWh per year.

Table 5 summarizes the project emissions.

[1]Based on the California Solar Initiative Simplified PV Module List. The 25th percentile nameplate capacity is 230 watts; 50th percentile nameplate capacity is 260 watts; 75th percentile nameplate capacity is 295 watts; and the 95th percentile nameplate capacity is 350 watts.

Table 5 Project GHG Emissions in 2020 (MT CO_2E per year)	
Emissions Source	Project Emissions
Vehicles	414
Energy Use	248
Area Sources	1
Water Use	25
Solid Waste Disposal	43
Construction[1]	13
Total	744

SOURCE: Appendix A
[1]Following the recommendation of multiple air districts construction-related emissions were amortized over a 30-year period (to represent the equivalent annual emissions) and added to operational emissions.

As shown, the project would result in a total of 744 MT CO_2E per year. Therefore, the project would not exceed the 900 MT CO_2E screening threshold for GHG emissions, and impacts would be less than significant.

b: Less Than Significant Impact

State GHG emissions reduction targets proposed and/or codified by EO S-3-05, AB 32, EO B-30-15, and SB 32 include achieving 1990 emission levels by 2020, 40 percent below 1990 levels by 2030, and 80 percent below 1990 levels by 2050. As discussed, the 900 MT CO_2E criterion used to determine significance under CEQA was designed to set the emission threshold appropriate to exclude small development projects that would contribute a relatively small fraction of the cumulative statewide GHG emissions. These smaller projects were determined to not conflict with the AB 32 mandate for reducing GHG emission (CAPCOA 2008).

The project's 2020 emissions represent the maximum emissions inventory for the project, as project emissions would continue to decline from 2020 through at least 2050 due to regulatory requirements that would increase the amount of renewable energy sources thereby decreasing GHG emissions associated with energy use. Given the reasonably anticipated decline in project emissions, due to existing regulatory programs, once the project is fully constructed and operational, the project emissions would continue to decline in line with the GHG reductions needed to achieve the GHG emissions reduction goals. As the project would generate emissions below the 900 MT CO_2E screening level, it would not conflict with the AB 32 mandate for reducing GHG emissions. Impacts would be less than significant.

4.8 Hazards and Hazardous Materials

Would the project:

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Create a significant hazard to the public or the environment through routine transport, use, or disposal of hazardous materials?	☐	☒	☐	☐
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?	☐	☒	☐	☐
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
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?	☐	☐	☒	☐
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?	☐	☐	☐	☒
f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☐	☐	☒

EXPLANATIONS:

a: Potentially Significant Unless Mitigation Incorporated

The project would involve the demolition of the existing residential structures. Due to the age of the main house (circa 1949; SCS Engineers 2018; Appendix E), there is potential for lead based paint (LBP) and asbestos-containing materials (ACMs) to be present. The EPA, California Environmental Protection Agency (CalEPA) and the Occupational Health and Safety Administration (OSHA) regulate hazardous materials, including LBP and ACMs. The EPA and OSHA require proper abatement and disposal of asbestos- and lead-containing materials to protect human health and safety. To ensure this is completed, the following mitigation is required:

MM H-1: Prior to issuance of a building permit or other applicable permit that includes demolition of the main house on Parcel 626-070-5700 (624th 7th Street), a survey shall be performed to determine the presence or absence of Asbestos-Containing Materials (ACMs). Suspect materials that will be disturbed by the demolition or renovation activities shall be sampled and analyzed for asbestos content, or assumed to be asbestos containing. The survey shall be conducted by a person certified by Cal/OSHA pursuant to regulations implementing subdivision (b) of Section 9021.5 of the Labor Code, and shall have taken and passed an EPA-approved Building Inspector Course. Should regulated ACMs be found, it shall be handled in compliance with the San Diego County Air Pollution Control District Rule 361.145 – Standard for Demolition and Renovation. Evidence of completion of the facility survey shall consist of a signed, stamped statement from the person certified to complete the facility survey indicating that the survey has been completed and that either regulated asbestos is present or absent. If present, the letter shall describe the procedures that will be taken to remediate the hazard.

MM H-2: Prior to issuance of a building permit or other applicable permit that includes demolition of the main house on Parcel 626-070-5700 (624th 7th Street), a survey

> shall be performed by a California Department of Health Services certified lead inspector/risk assessor to determine the presence or absence of LBP. All lead-containing materials scheduled for demolition must comply with applicable regulations for demolition methods and dust suppression. Lead-containing materials shall be managed in accordance with applicable regulations including, at a minimum, the hazardous waste disposal requirements (Title 22 California Code of Regulations [CCR] Division 4.5), the worker health and safety requirements (Title 8 CCR Section 1532.1), and the State Lead Accreditation, Certification, and Work Practice Requirements (Title 17 CCR Division 1, Chapter 8).

Construction activities associated with the project itself would not involve the routine use of hazardous materials. During construction of the project, small amounts of solvent and petroleum products, such as waste oil and oil-saturated material, may occur on-site. These 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.

Once constructed, the residential, hotel, restaurant, and retail uses would not require the routine transport, use, or disposal of hazardous materials. Therefore, the project would not create a significant hazard through the routine transport, use, or disposal of hazardous materials, and impacts would be less than significant.

b: Potentially Significant Unless Mitigation Incorporated

A Phase I Environmental Site Assessment (ESA) was conducted for the project site by SCS Engineers. According to the Phase I ESA (SCS Engineers 2018; Appendix E), there were no indications of the presence of hazardous materials/petroleum products or hazardous waste observed within or around the existing garage or located within the vacant portion of the project site. In addition, there were no obvious signs of a past release of hazardous materials, wastes or petroleum products within the project site, nor were there any indications of wells, cisterns, pits, sumps, dry wells, or bulk storage tanks observed within the project site.

According to site research performed and documents in the Phase I ESA, a search of the County of San Diego DEH file indicated that there is no regulatory file associated with the project site. The City of Imperial Beach Fire Department indicated no hazardous materials/underground storage tank records for the site.

Interviews of past and present owners of the project site indicated that there have been no releases of hazardous materials, petroleum products, and/or hazardous wastes at the site. In addition, the interviews indicated that there are no notices from governmental entities regarding possible violations of environmental laws or possible liability relating to hazardous substances or petroleum products within the site.

An environmental regulatory database search was conducted for the project site in order to identify facilities within up to one mile from the site. The site itself was not listed on any environmental regulatory database. With regards to off-site listed sites, the Phase I ESA determined that there is a low likelihood that off-site facilities listed represent a recognized

environmental condition in connection with the project site. The Phase I ESA determined that there is no evidence of a recognized environmental condition in connection with the project site.

As indicated above, the main residence on-site has potential for LBP and ACMs. Disturbance of such materials during demolition has potential to create a hazard for workers on the site and possibly the adjacent properties. The above mitigation measure H-1 and H-2 would be required to reduce this potential to below a level of significance.

c: No Impact

The project site is not located within 0.25 mile of any schools. The nearest school is Mar Vista High School, located approximately 0.30 mile south of the project site at 601 Elm Avenue in the city of Imperial Beach. Use and handling of hazardous materials during construction of the project would be conducted consistent with all applicable regulations (see Section 4.8[a]) and the completed single-family residence and seawall would not emit hazardous materials. No impact would occur.

d: Less Than Significant Impact

As discussed in the Phase I ESA, the project site is not located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, or any other environmental regulatory database. Impacts would be less than significant.

e: No Impact

The project site is located approximately eight miles west of Brown Field Municipal Airport. Naval Outlying Landing Field (NOLF) Imperial Beach, also known as Ream Field, is located approximately one mile south of the project site, which is one of two naval auxiliary airfields operated by Naval Air Station (NAS) North Island as part of the Naval Base Coronado (NBC) installation. NOLF is used for helicopter flight training operations. The project site is located within the Airport Influence Area (AIA) Review Area 2 of the NOLF Airport Land Use Compatibility Plan (ALUCP), which is subject to airspace protection and overflight policies and standards. However, the height of the proposed structure would not exceed that of surrounding residential structures and would not disrupt flight patterns. In addition, the project site is not within a designated safety compatibility zone of the NOLF ALUCP. Therefore, the project would not result in a safety hazard for people working or residing in the project area. No impact would occur.

f: No Impact

There are no private airstrips located within the vicinity of the project site. No impact would occur.

g: No Impact

Construction and operation of the proposed project would not interfere with any adopted emergency response plan or emergency evacuation plan. No impact would occur.

h: No 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 based upon fuels, terrain, weather, and other relevant factors. The project site is in a Non Very High Fire Hazard Severity Zones (CAL FIRE 2009). Furthermore, the project site is surrounded by existing development. No impact would occur.

4.9 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?	☐	☐	☒	☐
b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table?	☐	☐	☒	☐
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner, which would result in substantial erosion or siltation on- or off-site?	☐	☐	☒	☐
d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner, which would result in flooding on- or off-site?	☐	☐	☒	☐

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
e. 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?	☐	☐	☒	☐
f. Otherwise substantially degrade water quality?	☐	☐	☒	☐
g. Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	☐	☐	☒	☐
h. Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	☐	☐	☒	☐
i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☒	☐
j. Contribute to inundation by seiche, tsunami, or mudflow?	☐	☐	☒	☐

EXPLANATIONS:

a, e, and f: Less Than Significant Impact

The project would comply with the City's Storm Water Management, Discharge Control Ordinance, and other applicable storm water quality standards during and after construction. A Storm Water Quality Management Plan (SWQMP) has been prepared for the project by REC Consultants, Inc. (REC 2018a; see Appendix D), detailing the treatment control BMPs that have been selected that would ensure pollutants are not discharged to receiving waters. Proposed BMPs as fully described in the storm water quality management plan (REC 2018a) are summarized below.

The project would employ site design, source control and structural BMPs. Source control BMPs include prevention of illicit discharges into the Municipal Storm Drain System (MS4), storm drain stenciling or signage, and protection of trash storage areas from rainfall, run-on and run-off and wind dispersal. Site design BMPs include maintaining existing drainage pathways and hydrologic features in the existing condition/location, conservation natural areas, soils and vegetation, minimizing impervious areas, minimizing

soil compaction, impervious area dispersion, and the use of landscaping with native or drought-tolerant species. Structural BMPs include flow-based proprietary modular biofiltration and a flow-control storage facility. With the implementation of these BMPs, runoff would be treated to remove pollutants before exiting the project site. Furthermore, the project would comply with all applicable storm water regulations during construction and operation of the project including a statewide General National Pollution Discharge Elimination System (NPDES) permit for Storm Water Discharges Associated with Construction Activities. Compliance with existing storm water quality regulations including the storm water BMPs outlined in the project's storm water quality management plan (REC 2018a). Thus, the project would not substantially degrade water quality, violate any water quality standards, or otherwise create or contribute runoff water, which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff.

The project would collect and convey storm water runoff through an on-site storm drain system and conveyed to an underground detention vault located within the northwest corner of the project site that would convey, collect, and treat runoff and avoid water quality impacts from runoff. Water quality would be treated before exiting the project site by the storm water BMPs identified above. Additionally, the proposed condition peak flow rate from the site would remain the same as the existing condition; thus, the project runoff would not exceed the capacity of storm water drainage systems. Thus, the project would result in a less than significant impact related to storm water drainage systems and polluted runoff.

b: Less Than Significant Impact

The project is located in an urban area with existing infrastructure and would not withdraw groundwater. The nominal increase of impervious surfaces at the project site would not affect local groundwater recharge. Therefore, the project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge, and impacts would be less than significant.

c – d: Less Than Significant Impact

A site-specific SWQMP (REC 2018a) and Drainage Study (REC 2018b; Appendix F) was prepared for the project that evaluates the existing and proposed drainage patterns.

The site is currently a vacant lot with a smaller developed single-family residence located to the east of the main vacant lot. Runoff drains via overland flow in a northwesterly direction towards the adjacent development north of the project site, ultimately draining to the salt ponds/San Diego Bay north of the project site. The existing discharge location from the site is located at the northwest corner the site adjacent to the northern development. The existing condition peak flowrate generated from the site is 1.7 cubic feet per second (cfs). The overall existing impervious area is approximately 4,589 square feet. The impervious surfaces on the site include roof, sidewalk, and asphalt (parking). The pervious surfaces consist of vegetated grass areas.

In the post-project condition, impervious surfaces on the project site would increase by 44,135 square feet to a total of 48,724 square feet due to the majority of the site existing in an undeveloped condition.

Runoff from the majority of the project site would be intercepted by an on-site storm drain system and conveyed to an underground detention basin located within the northwest corner of the project site. Peak flows are mitigated by this detention vault and would then be discharged via storm drain to the existing storm drain system located within the adjacent Highway 75 to the south of the project site, which ultimately discharges into San Diego Bay. A portion of the frontage of the project site is unable to discharge to this detention system and would drain directly to the existing storm drain system within Highway 75. Ultimately, the peak flow from the project site is mitigated by the detention vault such that post developed condition flows are equal to those experienced in the current existing condition, as summarized in Table 6.

Table 6
Summary of Peak Flows

Discharge Location	Drainage Area			100-Year Peak Flow (cfs)		
	Existing	Developed	Difference	Existing	Developed	Difference
San Diego Bay	1.3	1.4	+0.1	1.7	1.7	0.0

SOURCE: Appendix F
cfs = cubic feet per second

As shown in Table 6, the 100-year peak flows from the project site would remain the same (1.7 cfs) as those experienced under the existing condition, as there is no increase in peak flow due to the development of the project site. As such, the project would not substantially alter the drainage patterns of the project site, and would not result in on- or off-site erosion, siltation or flooding, and impacts related to drainage would be less than significant.

g, h, and i: Less Than Significant Impact

The project site is not located within a 100-year flood hazard area as mapped by the Federal Emergency Management Agency Flood Insurance Rate Map Number 060723C2153G. The dams nearest to the project site are the Upper and Lower Otay Lakes Reservoir dams, located approximately 11 miles to the east of the project site. The project site is not located within the dams' inundation area (County of San Diego 2010). Therefore, the project would not expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam, and impacts would be less than significant.

j: Less Than Significant Impact

The project site is not at risk from seiches because there are no rivers, reservoirs, ponds, or lakes near the project site. No impact would occur. The project site is relatively flat and would not be subject to inundation by mudflow. No impact would occur.

The 2009 Tsunami Inundation Map for Emergency Planning prepared for the region indicates the project is not within a tsunami inundation zone (California Emergency Management Agency 2009).

4.10 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?	☐	☐	☐	☒
b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐
c. Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☐	☒

EXPLANATIONS:

a: No Impact

The project site is located at 550 Highway 75 in the city of Imperial Beach. Surrounding land uses consist of multi-family residential to the north, single-family/commercial to the west, as well as an RV park and other commercial services to the west and south across Highway 75. The project would be constructed on a vacant lot and former single-family residential lot. Considering the adjacent mixed residential and commercial uses, the proposed residential and commercial project would be consistent with the surrounding land uses. Therefore, the project would not physically divide an established community, and no impact would occur.

b: Less Than Significant Impact

The project would be consistent with the adopted general plan and zoning designation for the project site of C/MU-1 General Commercial & Mixed Use. The C/MU-1 land use designation provides for commercial development, mixed use development, multiple-family dwellings, and businesses to meet the local demand for commercial goods and services.

In addition, the project would not conflict with the Palm Avenue Mixed Use and Commercial Corridor Master Plan, adopted in 2015. Consistent with this plan, the project would include pedestrian improvements along the project frontage with Highway 75 as well

as bike racks. The project is also oriented in a manner to be conducive towards pedestrians along the roadway, as it places the taller structure at the rear of the property to not wall off the site; includes open active use areas such as tables, patios, and a play area accessible from the sidewalk; and an enhanced streetscape with landscaping and walkway. Thus, the project promotes the Palm Avenue Mixed Use and Commercial Corridor Master Plan's objective of providing a multi-modal corridor conducive to pedestrians, bicyclists, transit, vehicles as well as to business and new infill development.

c: No Impact

As described in Section 4.4(f), the City is located within the designated boundary of the Multiple Species Conservation Program, but is not a participant. The City does not have any other approved local, regional, or state Habitat Conservation Plan. No impact would occur.

4.11 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?	☐	☐	☐	☒
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?	☐	☐	☐	☒

EXPLANATIONS:

a – b: No Impact

According to the California Department of Conservation Mineral Land Classification Map, Plate 29, the project site is not within a known designated mineral resource zone (California Department of Conservation 1985). No known previous mineral-related activities (e.g., exploration and production) have occurred within or adjacent to the project site. The site is zoned and designated for urban development, with mineral-related activities not an allowable use under applicable designations. In addition, the urban nature of the surrounding areas would generally preclude the type of extraction operations typically associated with aggregate minerals (i.e., large-scale pits or quarries). The site also is not delineated as a mineral resource recovery area on any land use plans. No impact would occur.

4.12 Noise

Would the project:

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Expose persons to or generate noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☒	☐	☐
b. Expose persons to or generate excessive ground borne vibration or ground borne noise levels?	☐	☐	☒	☐
c. Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐
d. Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above existing without the project?	☐	☐	☒	☐
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 expose people residing or working in the area to excessive noise levels?	☐	☐	☐	☒
f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☒	☐

EXPLANATIONS:

a: Potential Significant Impact Unless Mitigation Incorporated

The following is based on the Noise Analysis report prepared by RECON Environmental, Inc. (RECON) in September 2018 (Appendix G).

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 in a manner similar to the Richter scale for earthquake magnitudes. A doubling of the energy of a noise source, such as doubling of traffic volume, would increase the noise level by 3 dB; a halving of the noise energy would result in a 3 dB decrease.

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).

The impact of noise is not a function of loudness alone. The time of day when noise occurs and the duration of the noise are also important. In addition, most noise that lasts for more than a few seconds is variable in its intensity. Consequently, a variety of noise descriptors has been developed. The noise descriptors used for this study are the equivalent noise level (L_{eq}), the maximum noise level, and the community noise equivalent level (CNEL).

The L_{eq} is the equivalent steady-state noise level in a stated period of time that is calculated by averaging the acoustic energy over a time period; when no period is specified, a 1-hour period is assumed. The maximum noise level is the highest sound level occurring during a specific period.

The CNEL is a 24-hour equivalent sound level. The CNEL calculation applies an additional 5 dB(A) penalty to noise occurring during evening hours, between 7:00 p.m. and 10:00 p.m., and a 10 dB(A) penalty is added to noise occurring during the night, between 10:00 p.m. and 7:00 a.m. These increases for certain times are intended to account for the added sensitivity of humans to noise during the evening and night.

General Plan Land Use Compatibility

The City's Noise Element of the General Plan specifies compatibility standards for different land use categories. The project proposes a hotel and residential uses along with a retail space and a restaurant. Exterior use areas include a rooftop pool for residential use, a second-floor restaurant terrace, and a ground-floor kids play area and courtyard. Due to the

unique mixed use nature of the project, various standards were applied based on the primary use of the area. The residential and transient lodging standards were applied to the residential uses (including the pool deck) and hotel uses, the playground standards were applied to the kids play area and courtyard, and the commercial standards were applied to the second-floor restaurant terrace. As shown, residential uses are "acceptable" with exterior noise levels up to 60 CNEL and "conditionally acceptable" with exterior noise levels up to 70 CNEL. Hotel uses are "acceptable" with exterior noise levels up to 60 CNEL and "conditionally acceptable" with exterior noise levels up to 75 CNEL. Playgrounds are "acceptable" with exterior noise levels up to 70 CNEL and "conditionally acceptable" with exterior noise levels up to 75 CNEL. Commercial uses "acceptable" with exterior noise levels up to 75 CNEL (City of Imperial Beach 2015). According to the City Noise Element, "[f]or areas where the noise environment is conditionally acceptable for a particular land use, development shall be allowed only after noise mitigation has been incorporated into the design of the project to reduce noise levels." Therefore, if noise levels are in the "conditionally acceptable" levels, the City requires exterior noise levels to be reduced to comply with the "acceptable" noise level for the particular land use.

The main source of traffic noise at the project site is vehicle traffic on Highway 75. Exterior noise levels were modeled in the Noise Analysis prepared for the project. Exterior noise levels were modeled at the exterior use areas (pool, deck, courtyard, and kids play area) for the purposes of determine compatibility with the City's exterior noise standards. Exterior noise levels were modeled at first- through fourth-floor building façade elevations to determine the need for an interior noise analysis. The results are summarized in Table 7.

The exterior use areas include the courtyard (Receivers 26 and 27), kids play area (Receiver 28), deck (Receivers 29 and 30), and pool (Receivers 31, 32, and 33). The residential standard of 60 CNEL was applied to the rooftop pool deck, the playground standard of 70 CNEL was applied to the kids play area and courtyard, and the commercial standard of 75 CNEL was applied to the second-floor restaurant terrace. As shown, noise levels at the kids play area and courtyard would range from 66 to 68 CNEL, and noise levels at the second-floor restaurant terrace would range from 67 to 70 CNEL. These areas would be compatible with the City's playground and commercial "acceptable" noise level limits of 70 and 75 CNEL, respectively.

As shown, exterior noise levels at the rooftop pool deck would range from 63 to 64 CNEL and would be considered "conditionally acceptable" with residential uses. Therefore, mitigation would be required to reduce noise levels to comply with the City's compatibility standards. Based on the current site plan, required mitigation would include a 3.5-foot-high barrier adjacent to the rooftop pool (Figure 6). By incorporating this barrier in to the project, exterior noise levels would be reduced to 60 CNEL or less.

Table 7
Future Vehicle Traffic Noise Levels without Barriers

Receiver	Location	Exterior Noise Level (CNEL)				
		1st Floor	2nd Floor	3rd Floor	4th Floor	Roof
1	Lobby/Office/Restaurant Building Façade	70	71	--	--	--
2	Lobby/Office/Restaurant Building Façade	70	73	--	--	--
3	Lobby/Office/Restaurant Building Façade	67	70	--	--	--
4	Hotel/Residential Building Façade	66	68	68	67	--
5	Hotel/Residential Building Façade	62	64	64	64	--
6	Hotel/Residential Building Façade	60	62	63	63	--
7	Hotel/Residential Building Façade	61	62	63	65	--
8	Hotel/Residential Building Façade	68	69	70	71	--
9	Hotel/Residential Building Façade	70	72	72	71	--
10	Hotel/Residential Building Façade	60	64	64	64	--
11	Hotel/Residential Building Façade	57	61	62	62	--
12	Hotel/Residential Building Façade	56	60	61	60	--
13	Hotel/Residential Building Façade	56	59	59	59	--
14	Hotel/Residential Building Façade	55	57	58	58	--
15	Hotel/Residential Building Façade	50	51	51	52	--
16	Hotel/Residential Building Façade	49	50	50	51	--
17	Hotel/Residential Building Façade	42	41	44	47	--
18	Hotel/Residential Building Façade	40	43	43	48	--
19	Residential Building Façade	40	41	43	46	--
20	Residential Building Façade	40	41	41	46	--
21	Residential Building Façade	59	62	62	62	--
22	Residential Building Façade	68	70	70	70	--
23	Residential Building Façade	68	71	71	71	--
24	Residential Building Façade/Retail Patio	69	71	72	71	--
25	Residential Building Façade/Retail Patio	69	71	71	71	--
26	Courtyard	66	--	--	--	--
27	Courtyard	67	--	--	--	--
28	Kids Play Area	68	--	--	--	--
29	Second-Floor Terrace	--	67	--	--	--
30	Second-Floor Terrace	--	70	--	--	--
31	Rooftop Pool	--	--	--	--	64
32	Rooftop Pool	--	--	--	--	63
33	Rooftop Pool	--	--	--	--	63

SOURCE: Appendix G
CNEL = community noise equivalent level

Image Source: Nearmap (flown June 2018)

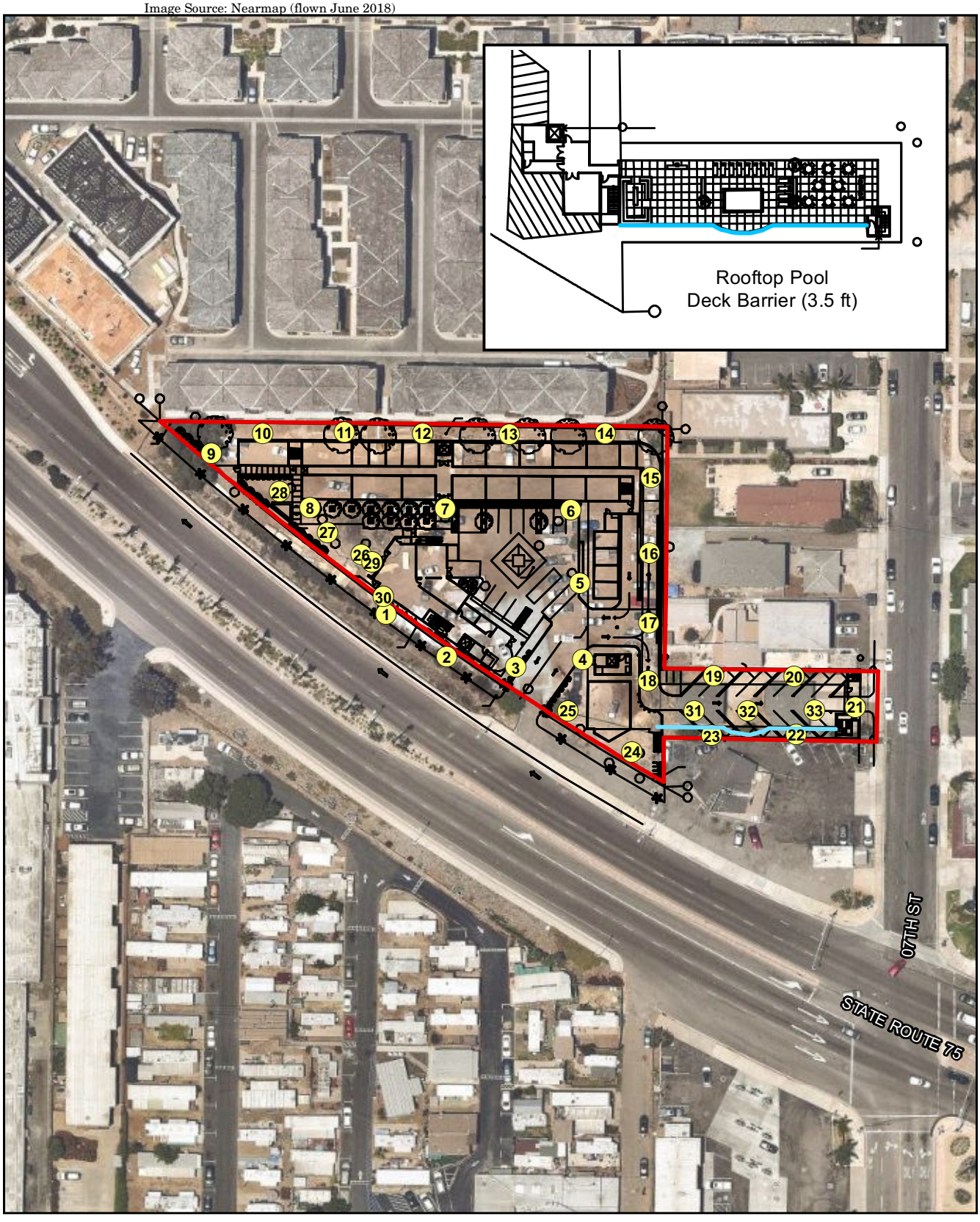

FIGURE 6

Modeled Receivers and Barrier Locations

RECON

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MM N-1: On-site Noise Barrier. Prior to the issuance of building permits, the City shall verify the building plans state the following and identify noise barrier, as applicable:

Exterior noise levels at the rooftop pool deck identified as Receivers 31 through 33 on Figure 6 shall be reduced to the City's Noise Element threshold of 60 CNEL for residential uses. Noise reduction for exterior traffic noise impacts can be accomplished through an on-site noise barrier. A 3.5-foot-high barrier adjacent to the rooftop pool, as shown in Figure 6, shall be constructed. The sound attenuation wall must be solid and free of cracks or holes. It can be constructed of masonry, wood, plastic, fiberglass, steel, or a combination of those materials, as long as there are no cracks or gaps, through or below the wall. Any seams or cracks must be filled or caulked. If wood is used, it can be tongue and groove and must be at least one-inch total thickness or have a density of at least 4 pounds per square foot.

The interior noise level standard for residential units and sleeping units (e.g., hotel rooms) is 45 CNEL. Assuming standard light-frame construction with double-glazed windows, interior noise levels would be reduced to 45 CNEL or less in buildings exposed to exterior noise levels of 70 CNEL or less. Exterior noise levels at the residential and hotel façades would range from 40 to 72 CNEL (see Table 7). Exterior noise levels would exceed 70 CNEL at the building façades located closest to SR-75 (Receivers 8, 9, 23, 24, and 25). For the residential units and hotel rooms located where exterior noise exceeds 70 CNEL, building components that achieve a greater composite sound transmission class rating of up to 27 dB would be required.

MM N-2: Interior Noise. Prior to the issuance of building permits for the hotel and residential buildings, the City shall verify the building plans state the following and identify sound resistant construction specifications, as applicable:

Interior noise levels shall be reduced to 45 CNEL or less in all habitable rooms for the residential units and hotel rooms located adjacent to Receivers 8, 9, 23, 24, and 25 as identified in Figure 6. Sound-resistant construction for walls adjacent to these receivers shall achieve a combined minimum sound transmission class rating (STC) ranging of 27 dB. This can be achieved with typical exterior wall construction consisting of wood framing, drywall, insulation, and exterior stucco siding, and window and door components with a minimum STC rating of 27. This minimum sound transmission class rating shall be identified on the building plans window and door schedule.

Imperial Beach Municipal Code – Construction

Construction noise is regulated by Chapter 9.32 of the Imperial Beach Municipal Code. According to Section 9.32.020(H), the use of any tools, power machinery, or equipment so as to cause noises disturbing to the comfort and repose of any person residing or working in the vicinity, or in excess of 75 dB(A) L_{eq}, between the hours of 10:00 p.m. and 7:00 a.m. is prohibited, except when the same is necessary for emergency repairs required for the

health and safety of any member of the community. The Municipal Code does not set daytime noise level limits on construction activities. However, for purposes of environmental review the City uses the County of San Diego's Noise Ordinance limit of 75 dB(A) $L_{eq(8)}$ at residential uses during the daytime hours.

Noise associated with the grading, building, and paving for the project would potentially result in short-term impacts to surrounding properties. Residential uses are located north and east of the project site, and an RV park is located south of the project site. A variety of noise-generating equipment would be used during the construction phase of the project, such as excavators, backhoes, front-end loaders, and concrete saws, along with others. Construction noise levels at the adjacent properties were modeled in the Noise Analysis prepared for the project. Noise levels were modeled at a series of 15 receivers located at the adjacent uses. The results are summarized in Table 8. Modeled receiver locations and construction noise contours are shown in Figure 7.

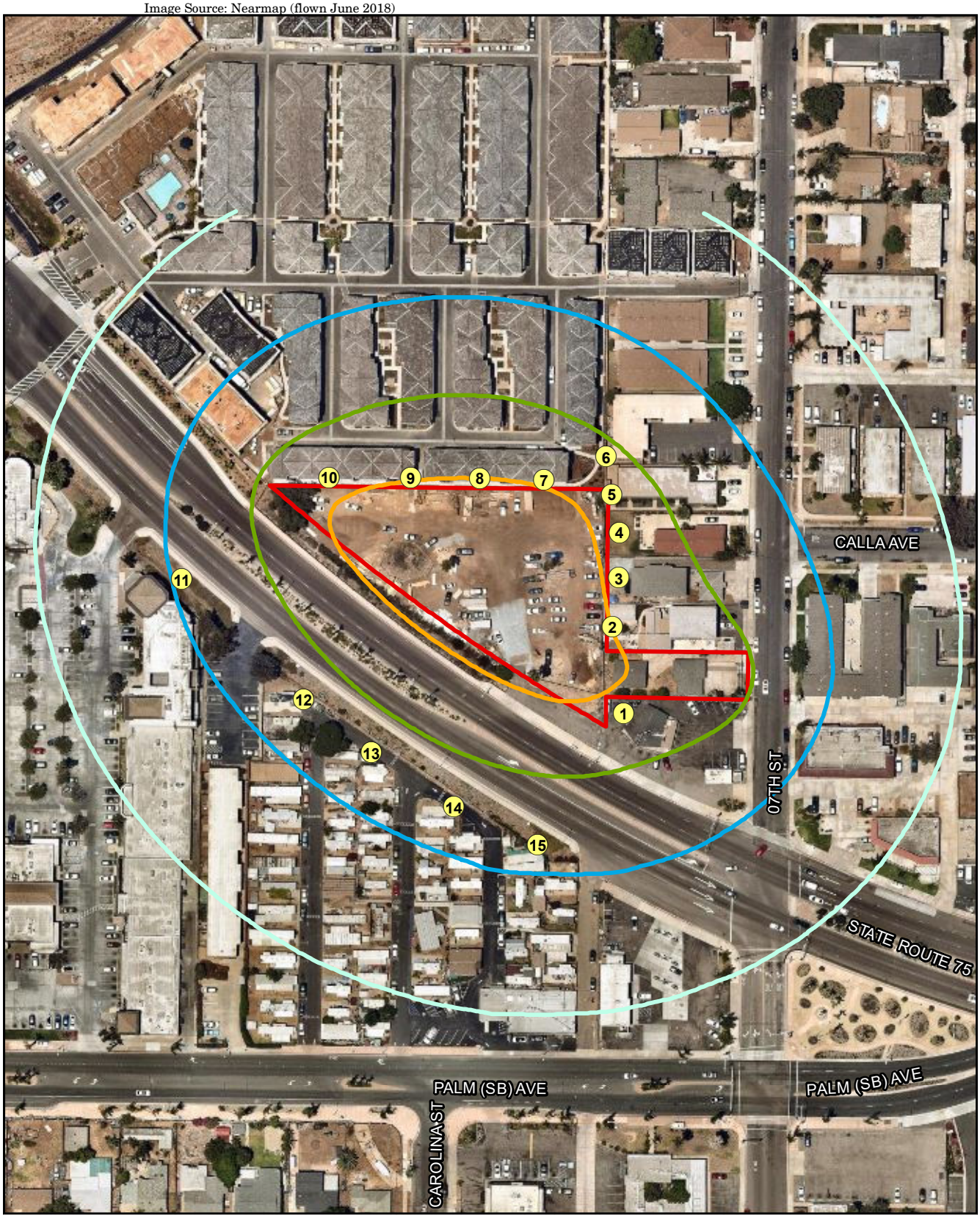
Table 8
Construction Noise Levels

Receiver	Land Use	Construction Noise Level [dB(A) L_{eq}]
1	Restaurant	73
2	Residential	75
3	Residential	74
4	Residential	73
5	Residential	73
6	Residential	72
7	Residential	75
8	Residential	75
9	Residential	75
10	Residential	74
11	Commercial	66
12	RV Park	68
13	RV Park	68
14	RV Park	67
15	RV Park	66

SOURCE: Appendix G
dB(A) L_{eq} = A-weighted decibels equivalent noise level

As shown, construction noise levels are not anticipated to exceed 75 dB(A) L_{eq} at the adjacent residential uses. Although the existing adjacent residences would be exposed to construction noise levels that could be heard above ambient conditions, the exposure would be temporary. Additionally, construction activities would occur during the daytime hours and would comply with Section 9.32.020(H) of the City's Municipal Code. As construction activities associated with the project would comply with Municipal Code Section 9.32.020(H) and daytime noise levels would not exceed 75 dB(A) L_{eq} at adjacent residential uses, temporary increases in noise levels from construction activities would be less than significant.

Image Source: Nearmap (flown June 2018)



Project Boundary

Modeled Receivers

Construction Noise Contours

60 dB(A) Leq

65 dB(A) Leq

70 dB(A) Leq

75 dB(A) Leq

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FIGURE 7

Construction Noise Contours

Stationary Noise

The City does not identify specific property line noise standards for stationary noise sources; however, the City commonly utilizes the County's Noise Ordinance limits for projects within the City. The most restrictive property line noise level limits are 50 dB(A) L_{eq} between 7:00 a.m. and 10:00 p.m. and 45 dB(A) L_{eq} between 10:00 p.m. and 7:00 a.m.

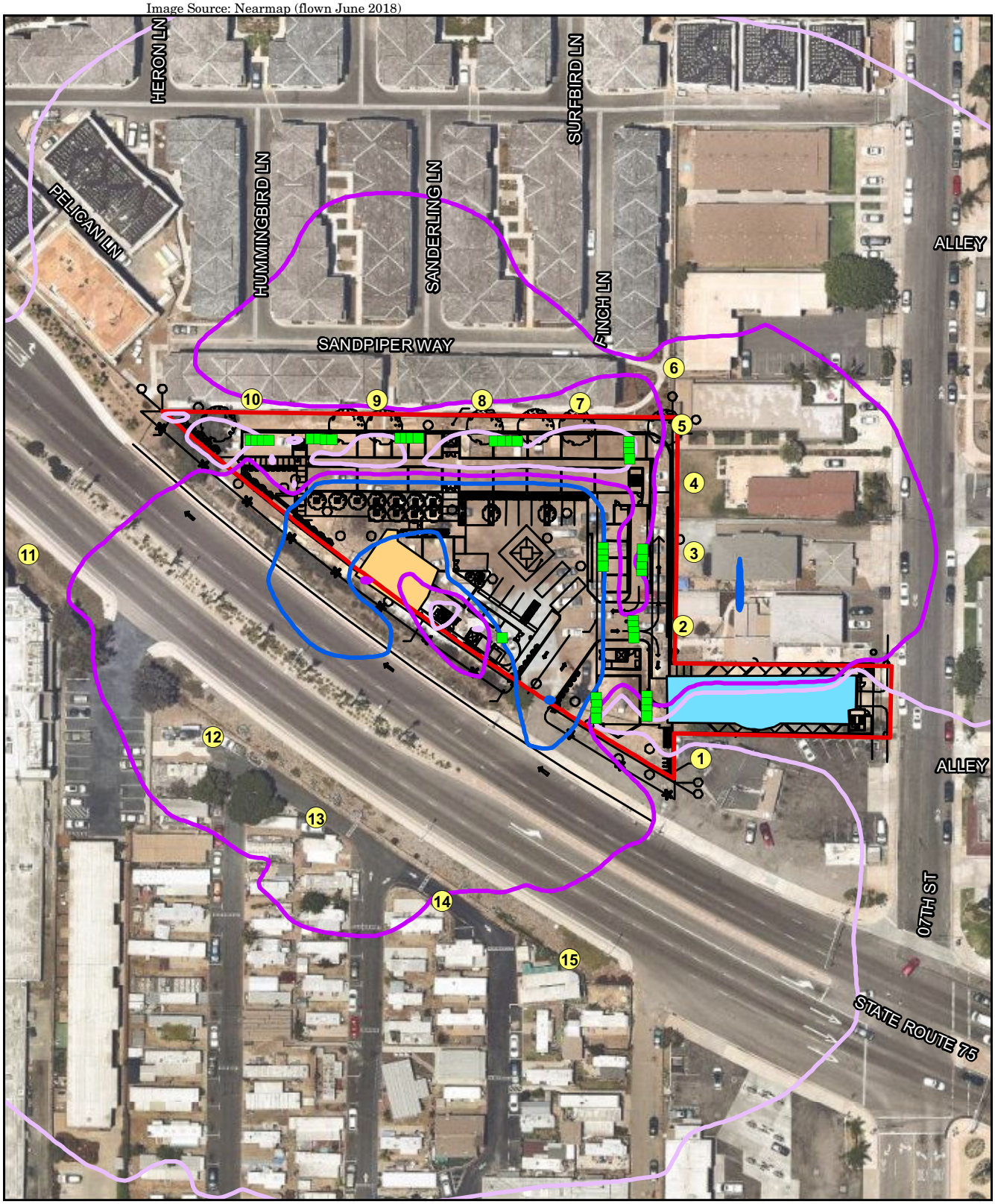
The primary noise sources on-site would be rooftop heating, ventilation, and air conditioning (HVAC) equipment, people gathering, and occasional music at the second-floor restaurant terrace, and people gathering on the rooftop pool deck. Noise levels due to these sources were modeled in the Noise Analysis prepared for the project. Noise levels were modeled at a series of 15 receivers located at the adjacent property lines. Future projected noise levels are summarized in Table 9 and shown in Figures 8a and 8b.

Table 9
On-Site Generated Noise Levels at Adjacent Property Lines

Receiver	Daytime Noise Level [dB(A) L_{eq}]	Nighttime Noise Level [dB(A) L_{eq}] (i.e., no terrace or pool)
1	36	32
2	44	43
3	44	44
4	43	43
5	41	41
6	41	41
7	39	38
8	41	41
9	41	41
10	40	40
11	38	36
12	42	40
13	41	39
14	40	39
15	39	38
SOURCE: Appendix G		

As shown, daytime on-site generated noise levels with all HVAC units operating at full capacity, people gathered and music playing on the restaurant terrace, and people gathered on the pool deck would range from 36 to 44 dB(A) L_{eq} at the adjacent properties, and nighttime noise levels with all HVAC units operating at full capacity would range from 32 to 44 dB(A) L_{eq} at the adjacent properties. Noise levels would be less than the most restrictive noise limit of 45 dB(A) L_{eq}.

Image Source: Nearmap (flown June 2018)



Project Boundary
Site Plan
Modeled Receivers
HVAC Units
Second Floor Terrace
Rooftop Pool Deck

On-Site Generated Noise Contours
35 dB(A) Leq
40 dB(A) Leq
45 dB(A) Leq

0 Feet 100

FIGURE 8a

On-Site Generated Noise Contours - Daytime

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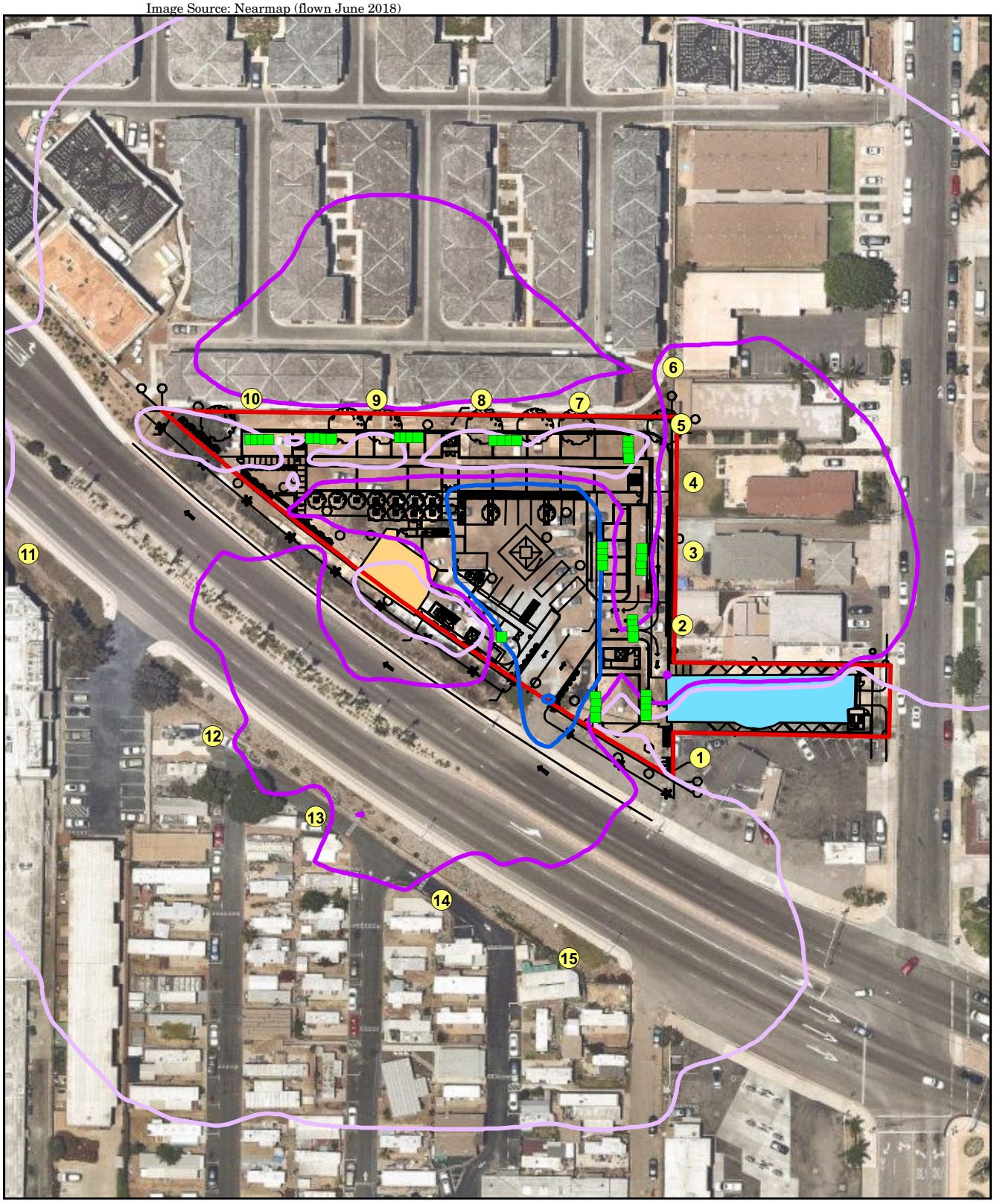
Image Source: Nearmap (flown June 2018)



0 Feet 100

Project Boundary
Site Plan
Modeled Receivers
HVAC Units
Second Floor Terrace
Rooftop Pool Deck

On-Site Generated Noise Contours

35 dB(A) Leq
40 dB(A) Leq
45 dB(A) Leq

FIGURE 8b

RECON

On-Site Generated Noise Contours - Nighttime

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b: Less Than Significant Impact

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

Vibration perception would occur at structures, as people do not perceive vibrations without vibrating structures. Human reaction to vibration is dependent on the environment the receiver is in as well as individual sensitivity. As example, vibration outdoors is rarely noticeable and generally not considered annoying. Heavy equipment used during the demolition, grading, and construction activities may generate some ground vibration; however, construction activities would be short-term, are not anticipated to result in continuous vibration levels, and would cease once construction is complete. No pile or caisson drilling or impact hammering would be required for the project. Construction activities are not expected to require the use of equipment with higher noise generation and vibration characteristics such as pile drivers, rock drills, or blasting equipment; therefore, construction of the project is not expected to generate excessive ground borne vibration or ground borne noise levels. Impacts would be considered less than significant.

Once occupied, the project would not be a source of groundborne vibration or groundborne noise levels.

c: Less Than Significant Impact

Construction noise would be temporary, and the primary sources of long-term, or "operational," noise would be rooftop HVAC equipment, people gathering, and occasional music at the second-floor restaurant terrace, and people gathering on the rooftop pool deck. As discussed in Section 4.12(a) Stationary Noise, daytime on-site generated noise levels with all HVAC units operating at full capacity, people gathered and music playing on the restaurant terrace, and people gathered on the pool deck would range from 36 to 44 dB(A) L_{eq} at the adjacent properties, and nighttime noise levels with all HVAC units operating at full capacity would range from 32 to 44 dB(A) L_{eq} at the adjacent properties. Noise levels would be less than the most restrictive noise limit of 45 dB(A) L_{eq}. Thus, there would be no substantial permanent increase in ambient noise levels, and impacts would be less than significant.

d: Less Than Significant Impact

Temporary increases in noise levels due to the project are associated with construction activities. As discussed in Section 4.12(a) above, construction noise levels are not anticipated to exceed 75 dB(A) L_{eq} at the adjacent residential uses. Although the existing adjacent residences would be exposed to construction noise levels that could be heard above ambient conditions, the exposure would be temporary. Additionally, construction activities would occur during the daytime hours and would comply with Section 9.32.020(H) of the

City's Municipal Code. As construction activities associated with the project would comply with Municipal Code Section 9.32.020(H) and daytime noise levels would not exceed 75 dB(A) L_{eq} at adjacent residential uses, temporary increases in noise levels from construction activities would be less than significant.

In addition, significant off-site noise impacts from project traffic on 7th Street would not occur. The projected traffic volumes and slow speeds of vehicles entering and exiting the project would not result in adverse noise increases that would exceed City standards.

e: No Impact

No public 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 public airport noise.

f: Less Than Significant Impact

NOLF Imperial Beach, also known as Ream Field, is located approximately one mile south of the project site, which is one of two naval auxiliary airfields operated by NAS North Island as part of the NBC installation. NOLF is used for helicopter flight training operations. The project site is located within the AIA Review Area 2, which is subject to airspace protection and overflight policies and standards. However, according to the Airport Land Use Compatibility Plan for NOLF, the project site is located well outside the 60 CNEL contour for airport operations (San Diego Regional Airport Authority 2015). Therefore, noise impacts due to airport operations would be less than significant.

4.13 Population and Housing

Would the project:

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐

b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

EXPLANATIONS:

a: Less Than Significant Impact

The project would involve removing one residence and constructing 51 apartments. Based on an average of 2.89 people per household, the project is anticipated to result in an increase of approximately 148 persons (SANDAG 2016). Per the SANDAG Series 13 growth forecast, the estimated population within the City is expected to rise to 30,369 by 2035 (SANDAG 2013), which would be an increase of 2,935 from the current estimated population of 27,434 in 2016 (SANDAG 2016). As such, the project would accommodate anticipated population growth as projected by SANDAG. The project would not indirectly result in growth, as it would not provide infrastructure improvements beyond that required to service the project, and employment generated by the site is anticipated to be filled by existing local residents or residents of the project. Therefore, the project would not induce substantial population growth, either directly or indirectly, and impacts would be less than significant.

b – c: No Impact

The project would involve the demolition of one residence. The proposed 51 apartments would more than replace this one unit. Thus, the project would not displace substantial numbers of existing housing or people, and no impact would occur.

4.14 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				

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐
ii. Police protection?	☐	☐	☒	☐
iii. Schools?	☐	☐	☒	☐
iv. Parks?	☐	☐	☒	☐
v. Other public facilities?	☐	☐	☒	☐

EXPLANATIONS:

a.i. Less Than Significant Impact

The Imperial Beach Fire Department is responsible for fire safety services for the City, which has one fire station located at 865 Imperial Beach Boulevard, approximately 1.25 miles southeast of the project site. The incremental increase in fire protection demand associated with the project would not result in the need for new or altered facilities, and has been accounted for in the General Plan and Local Coastal Plan. Therefore, impacts would be less than significant.

a.ii. Less Than Significant Impact

The City contracts law enforcement services from the San Diego County Sheriff's Department, which maintains a substation in the City located at 845 Imperial Beach Boulevard, approximately 1.25 miles southeast of the project site. The incremental increase in police protection demand associated with the single-family residence would not result in the need for new or altered facilities, and has been accounted for in the General Plan and Local Coastal Plan. Therefore, impacts would be less than significant.

a.iii. Less Than Significant Impact

Public school education in the City is provided by the South Bay Union School District for preschool and kindergarten through sixth grade. Sweetwater Union High School District serves grades 7 through 12. There are five schools within one mile of the project site, which include Bayside Elementary School, Imperial Beach Charter West, Sweetwater Community Day School, Mar Vista High School, and Imperial Beach Charter School. The incremental increase in demand for school services associated with the single-family residence would not substantially affect school enrollment. In addition, implementation of the project would require the payment of school fees. Conformance to statutory requirements for the payment

of school fees would ensure that project impacts to school facilities remain below a level of significance. Therefore, impacts would be less than significant.

a.iv. Less Than Significant Impact

The City operates six parks. The three City parks located within one mile of the project site include Dunes Park, located approximately one-quarter mile to the south, Portwood Pier Plaza, located approximately one-half mile to the south, and Imperial Beach Sports Park, located approximately one mile to the southeast of the project site. The incremental increase in demand for City parks associated with the project would not require construction of new facilities. Therefore, impacts would be less than significant.

a.v. Less Than Significant Impact

The San Diego County Library operates an Imperial Beach branch at 810 Imperial Beach Boulevard. The incremental increase in demand for library services associated with the project would not require construction of new facilities. Therefore, impacts would be less than significant.

4.15 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?	☐	☐	☒	☐
b. Include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	☐	☐	☒	☐

EXPLANATIONS:

a – b: Less Than Significant Impact

The project would include additional residences and, therefore, would cause an increase in the population within the project vicinity and the City. In addition, the hotel would generate temporary visitors to the City who could potentially use neighborhood and regional parks and the nearby beach. Nonetheless, the project is not anticipated to

substantially increase the demand or use of existing parks or recreational facilities (including the beach) in the City. Impacts would be less than significant.

4.16 Transportation/Traffic

Would the project:

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	☐	☐	☒	☐
b. Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	☐	☐	☒	☐
c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☒	☐
d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒
e. Result in inadequate emergency access?	☐	☐	☐	☒

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	☐	☐	☒	☐

EXPLANATIONS:

a: Less Than Significant Impact

The following impact analysis is based on the Traffic Impact Analysis (TIA) prepared for the project by Linscott, Law & Greenspan, Engineers (see Appendix B-1) and a stand-alone parking analysis has been prepared by the project architect and is included as Appendix B-2. The City uses the published San Diego Traffic Engineering Council (SANTEC)/Institute of Traffic Engineers (ITE) Guidelines for Traffic Impact Studies in the San Diego Region for the determination of the significant of impacts. The project is anticipated to generate 1,227 net ADT with 63 AM peak hour trips (22 in/41 out) and 105 PM peak hour trips (70 in/35 out). Project trip generation is summarized in Table 10.

Table 10
Net Project Trip Generation

Land Use	Size	Daily Trip Ends (ADT)		AM Peak Hour			PM Peak Hour		
		Rate	Volume	In	Out	Total	In	Out	Total
Motel	47 Rooms	9/Room	423	14	20	34	23	15	38
Apartments	51 DU	6/DU	306	5	20	25	20	8	28
Restaurant	5.385 ksf	100/ksf	539	3	2	5	30	13	43
Retail	1.205 ksf	40/ksf	48	1	1	2	2	2	4
10% Mixed Use Reduction[1]			(30)	(1)	(2)	(3)	(2)	(1)	(3)
Driveway Trips			1,286	22	41	63	73	37	110
10% Pass-By Reduction			(59)	(0)	(0)	(0)	(3)	(2)	(5)
Net Project Trip Generation			**1,227**	**22**	**41**	**63**	**70**	**35**	**105**

SOURCE: Appendix B-1
[1]Mixed-use reduction applied only to residential apartment component of the project

The TIA evaluated the project's direct and cumulative impacts on the local street system in the near-term and in the horizon year (2040). An assessment of near-term cumulative projects in the area was also conducted in order to evaluate the effects of these other proposed projects that could be developed and operating within the same near-term time period (approximately 2021) as the project. Table 11 summarizes the traffic impact significance thresholds.

Table 11 Traffic Impact Significance Thresholds		
Level of Service with Project	Allowable Increase Due to Project Impacts	
	Roadway Segments	Intersections
	V/C	Delay (seconds)
E&F	0.02	2
V/C = volume to capacity ratio		

The study area was based on the criteria identified in the SANTEC/ ITE Guidelines for Traffic Impact Studies in the San Diego Region. Based on these criteria and input from City staff, the following street segments and intersections were analyzed in the Existing, Near-Term, and Year 2040 conditions with and without the project:

Street Segments

- Highway 75
  - North of Rainbow Drive
  - Rainbow Drive to 7th Street
  - 7th Street to Delaware Street
  - Delaware Street to 9th Street
  - 9th Street to Florida Street
- Palm Avenue
  - Rainbow Drive to Highway 75
- Rainbow Drive
  - Highway 75 to Palm Avenue

Intersections

- Highway 75/Rainbow Drive
- Highway 75/7th Street
- Palm Avenue/7th Street
- Highway 75/Delaware Street
- Highway 75/9th Street

Existing Without and With Project Conditions

Street Segments

Table 12 summarizes the existing roadway segment operations with and without project traffic. As shown, with the addition of project traffic, the study area segments are calculated to continue to operate at LOS D or better, except for Palm Avenue between Rainbow Drive and Highway 75 (LOS E). However, the project-related increase in volume/capacity (V/C) ratio on this segment is less than the allowable 0.02, therefore, no significant direct impact would occur with development of the project.

Table 12
Existing + Project Street Segment Operations

Street Segment	Existing Capacity (LOS E)	Existing			Existing + Project			Δ V/C	Is this Impact Significant?
		ADT	LOS	V/C	ADT	LOS	V/C		
Highway 75									
North of Rainbow Drive	40,000	19,960	B	0.492	19,996	B	0.500	0.008	No
Rainbow Drive to 7th Street	40,000	16,730	B	0.418	17,436	B	0.436	0.018	No
7th Street to Delaware Street	50,000	21,320	B	0.426	21,946	B	0.439	0.013	No
Delaware Street to 9th Street	50,000	23,870	B	0.477	24,471	B	0.489	0.012	No
9th Street to Florida Street	50,000	35,190	C	0.704	35,742	C	0.715	0.011	No
Palm Avenue									
Rainbow Drive to Highway 75	15,000	13,640	E	0.909	13,824	E	0.922	0.013	No
Rainbow Drive									
Highway 75 to Palm Avenue	8,000	5,710	D	0.714	5,802	D	0.725	0.011	No

SOURCE: Appendix B-1
ADT = average daily traffic; LOS = level of service; V/C = volume to capacity

Intersections

Table 13 summarizes the intersections LOS with and without the project's peak hour traffic volumes. As shown, all intersections are calculated to continue to operate at LOS D or better, therefore, no significant direct impacts would occur with development of the project.

Table 13
Existing + Project Intersection Operations

Intersection	Control Type	Peak Hour	Existing		Existing + Project		Increase in Delay	Is this Impact Significant?
			Delay	LOS	Delay	LOS		
Highway 75/ Rainbow Drive	Signal	AM	34.4	C	35.1	D	0.7	No
		PM	26.0	C	27.1	C	1.1	No
Highway 75/ 7th Street	Signal	AM	12.5	B	13.8	B	1.3	No
		PM	14.4	B	16.8	B	2.4	No
Palm Avenue/ 7th Street	Signal	AM	9.3	A	9.4	A	0.1	No
		PM	8.5	A	8.6	A	0.1	No
Highway 75/ Delaware St.	Signal	AM	20.4	C	20.5	C	0.1	No
		PM	29.8	C	29.9	C	0.1	No
Highway 75/ 9th Street	Signal	AM	39.4	D	39.5	D	0.1	No
		PM	51.6	D	51.7	D	0.1	No
Project Driveways								
Highway 75/ Project Driveway	TWSC	AM	-	-	18.5	C	-	No
		PM	-	-	9.9	A	-	No
7th Street/ Project Driveway	TWSC	AM	-	-	9.2	A	-	No
		PM	-	-	8.8	A	-	No

SOURCE: Appendix B-1
Delay = seconds; LOS = level of service; TWSC = two-way stop controlled

Near-Term Without and With Project Conditions

Cumulative projects are other projects in the study area that will add traffic to the local circulation system in the near future. Based on information received from the City, 12 cumulative projects were identified and analyzed in the near-term condition. The net trip generation associated with these projects would be 4,630 ADT.

Street Segments

Table 14 summarizes the near-term roadway segment operations with and without project traffic. As shown, with the addition of cumulative-only projects as well as project traffic, the study area segments are calculated to continue to operate at LOS D or better, except for Palm Avenue between Rainbow Drive and Highway 75 (LOS E). However, the project-related increase in V/C on this segment is less than the allowable 0.02, therefore, no significant direct impact would occur with development of the project.

Table 14
Near-Term Street Segment Operations

Street Segment	Existing Capacity (LOS E)	Near-Term			Near-Term + Project			Δ V/C	Is this Impact Significant?
		ADT	LOS	V/C	ADT	LOS	V/C		
Highway 75									
North of Rainbow Drive	40,000	21,881	C	0.547	22,187	C	0.555	0.008	No
Rainbow Drive to 7th Street	40,000	18,557	B	0.464	19,263	B	0.482	0.018	No
7th Street to Delaware Street	50,000	23,165	B	0.463	23,791	B	0.476	0.013	No
Delaware Street to 9th Street	50,000	26,631	B	0.533	27,232	B	0.545	0.012	No
9th Street to Florida Street	50,000	37,972	C	0.759	38,524	C	0.770	0.011	No
Palm Avenue									
Rainbow Drive to Highway 75	15,000	14,630	E	0.975	14,814	E	0.988	0.013	No
Rainbow Drive									
Highway 75 to Palm Avenue	8,000	6,181	D	0.773	6,273	D	0.784	0.011	No

SOURCE: Appendix B-1
ADT = average daily traffic; LOS = level of service; V/C = volume to capacity

Intersections

Table 15 summarizes the intersections LOS with and without the project's peak hour traffic volumes. As shown, with the addition of cumulative as well as project traffic, all intersections are calculated to continue to operate at LOS D or better, therefore, no significant direct impacts would occur with development of the project.

Table 15
Near-Term Intersection Operations

Intersection	Control Type	Peak Hour	Near-Term		Near-Term + Project		Increase in Delay	Is this Impact Significant?
			Delay	LOS	Delay	LOS		
Highway 75/ Rainbow Drive	Signal	AM	48.7	D	50.0	D	1.3	No
		PM	32.5	C	34.2	C	1.7	No
Highway 75/ 7th Street	Signal	AM	12.8	B	14.0	B	1.2	No
		PM	14.7	B	17.1	B	2.4	No
Palm Avenue/ 7th Street	Signal	AM	9.5	A	9.6	A	0.1	No
		PM	8.7	A	8.7	A	0.1	No
Highway 75/ Delaware Street	Signal	AM	20.7	C	20.7	C	0.1	No
		PM	31.8	C	31.8	C	0.1	No
Highway 75/ 9th Street	Signal	AM	40.3	D	40.3	D	0.2	No
		PM	52.7	D	52.7	D	0.2	No
Project Driveways								
Highway 75/ Project Driveway	TWSC	AM	-	-	20.8	C	-	No
		PM	-	-	10.1	B	-	No
7th Street/ Project Driveway	TWSC	AM	-	-	9.2	A	-	No
		PM	-	-	8.8	A	-	No

SOURCE: Appendix B-1
Delay = seconds; LOS = level of service; TWSC = two-way stop controlled

Year 2040 Without and With Project Conditions

The City of Imperial Beach General Plan and the Otay Mesa-Nestor Community Plan identify several vehicular capacity enhancing projects; however, in order to be conservative, no circulation network changes or improvements are assumed for the Year 2040 conditions.

Street Segments

Table 16 summarizes the year 2040 roadway segment operations with and without project traffic. As shown, in year 2040 without project conditions, the study area segments are calculated to continue to operate at LOS D or better, except for Highway 75 between 9th Street and Florida Street (LOS E) and Palm Avenue between Rainbow Drive and Highway 75 (LOS E). With the addition of project traffic, study area segments are calculated to continue to operate at LOS D or better, except for Highway 75 between 9th Street and Florida Street (LOS E) and Palm Avenue between Rainbow Drive and Highway 75 (LOS F). However, these segments would operate at an unacceptable LOS without the project, and the project-related increase in V/C on these segments are less than the allowable 0.02; therefore, no significant cumulative impact would occur with development of the project.

Table 16
Year 2040 Street Segment Operations

Street Segment	Existing Capacity (LOS E)	Year 2040			Year 2040 + Project			Δ V/C	Is this Impact Significant?
		ADT	LOS	V/C	ADT	LOS	V/C		
Highway 75									
North of Rainbow Drive	40,000	31,630	D	0.791	31,936	D	0.798	0.007	No
Rainbow Drive to 7th Street	40,000	26,320	C	0.658	27,026	C	0.676	0.018	No
7th Street to Delaware Street	50,000	34,010	C	0.680	34,636	C	0.693	0.013	No
Delaware Street to 9th Street	50,000	41,780	D	0.836	42,381	D	0.848	0.012	No
9th Street to Florida Street	50,000	46,970	E	0.939	47,522	E	0.950	0.011	No
Palm Avenue									
Rainbow Drive to Highway 75	15,000	14,940	E	0.996	15,124	F	1.008	0.012	No
Rainbow Drive									
Highway 75 to Palm Avenue	8,000	5,490	D	0.686	5,582	D	0.698	0.012	No

SOURCE: Appendix B-1
ADT = average daily traffic; LOS = level of service; V/C = volume to capacity

Intersections

Table 17 summarizes the intersections LOS with and without the project's peak hour traffic volumes. As shown, under year 2040 conditions without and with the project, all intersections are calculated to continue to operate at LOS D or better, except the intersection of Highway 75/Rainbow Drive, which would operate at LOS E in the AM peak hour without and with the project. However, since the increase in delay at this intersection would be less than the allowable 2.0-second threshold with addition of project traffic to the year 2040 baseline condition, no significant cumulative impacts would occur with development of the project.

Table 17
Year 2040 Intersection Operations

Intersection	Control Type	Peak Hour	Year 2040		Year 2040 + Project		Increase in Delay	Is this Impact Significant?
			Delay	LOS	Delay	LOS		
Highway 75/ Rainbow Drive	Signal	AM	63.8	E	65.1	E	1.3	No
		PM	31.4	C	33.2	C	1.8	No
Highway 75/ 7th Street	Signal	AM	11.2	B	12.4	B	1.2	No
		PM	15.3	B	16.7	B	1.4	No
Palm Avenue/ 7th Street	Signal	AM	9.0	A	9.1	A	0.1	No
		PM	8.9	A	9.0	A	0.1	No
Highway 75/ Delaware Street	Signal	AM	24.6	C	24.7	C	0.1	No
		PM	35.4	D	35.5	D	0.1	No
Highway 75/ 9th Street	Signal	AM	39.2	D	39.4	D	0.2	No
		PM	53.0	D	53.4	D	0.4	No
Project Driveways								
Highway 75/ Project Driveway		AM	-	-	25.5	D	-	No
		PM	-	-	10.6	B	-	No
7th Street/ Project Driveway		AM	-	-	9.1	A	-	No
		PM	-	-	8.9	A	-	No

SOURCE: Appendix B-1
Delay = seconds; LOS = level of service; TWSC = two-way stop controlled

b: Less Than Significant Impact

The project would not conflict with a Congestion Management Plan (CMP) and would not negatively affect level of service standards. See response 4.16.a.

c: Less Than Significant Impact

NOLF Imperial Beach, also known as Ream Field, is located approximately one mile south of the project site, which is one of two naval auxiliary airfields operated by NAS North Island as part of the NBC installation. NOLF is used for helicopter flight training operations. The project site is located within the AIA Review Area 2, which is subject to airspace protection and overflight policies and standards. However, the height of the proposed structure would not exceed that of surrounding residential structures and would not disrupt flight patterns. In addition, the project site is not within a designated safety compatibility zone of the NOLF ALUCP. Less than significant air traffic impacts would occur.

d: No Impact

The project would not include the construction of any hazards (e.g., sharp curves or dangerous intersections), and would not result in incompatible uses with the surrounding developed area. Primary project access is proposed via a mid-block, right-in/right-out driveway to Highway 75. The left-turn restrictions at these types of driveways result in out-of-direction travel and corresponding U-turns for left-turn demand into or out of the site. A secondary, one-way outbound-only driveway is also proposed to 7th Street. The project would not increase hazards associated with any new design feature or create an incompatible use in association with the project access. Therefore, impacts would be less than significant.

e: No Impact

Emergency access would be maintained on existing public streets that border the project site. As discussed, primary access would be via a mid-block driveway. The internal access driveway would be constructed to a curb-to-curb width of at least 16 feet to allow for fire truck access. The project would not result in inadequate emergency access, as the project would not change any road features. No impact would occur.

f: Less Than Significant Impact

Bus service and bicycle routes are provided within the City. There is currently a bus stop located at the intersection of Highway 75/Rainbow Drive north of the project site, and at the intersection of Highway75/7th Street, directly south of the project site. The project would not affect the transit operations. The existing bus stops and services would continue to be available both during and after project construction. The City's Bicycle Transportation Plan identifies Highway 75 as a Class II bicycle facility. In addition, the Bayshore Bikeway, a Class I bike lane located approximately 1,500 feet to the north of the project site, provides for additional alternative modes of transportation (i.e., by bicycles and foot).

The project would construct a mixed use development that would promote and enhance the use of alternative transportation. The project would expand pedestrian facilities within the project site and also provide bike racks along the frontage. The project was also designed to promote pedestrian travel along the frontage, as it includes pedestrian orientation of structures as well as patio and exterior amenities to promote pedestrian usage.

In addition, the project would provide TDM features to further encourage transit use, carpooling, pedestrian/bike (multimodal) use, and transportation network company (TNC) use, such as Uber and Lyft. The following is a list of the TDM features to be provided:

- Monthly bus passes for employees
- Direct marketing/catering to military personnel including available shuttle service to and from the base
- Provision of bicycle racks (14) on-site for the general public
- Provision of motorcycle parking spaces
- Resident bicycle storage racks
- Dedicated on-site pickup zones for Uber and Lyft
- Proximity to the existing MTS bus stop (Route 901)
- Retail discounts with proof of public ridership or alternative transportation
- Shuttle services from adjacent parking lots, as needed/required
- Flex-parking for hotel purposes (e.g., Uber/Lyft and/or rental)

Thus, the project would be consistent with the Palm Avenue Mixed Use and Commercial Corridor Master Plan (as discussed in Section 4.10(b)); the project would not conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities. A less than significant impact would occur.

The project would also generate truck trips from the proposed export of soil during grading and construction. Approximately 17,500 cubic yards of export is proposed, resulting in

approximately 1,750 truck trips during the grading operation. The truck trips would result in short-term impacts on project area roadways that would be utilized for hauling of the export material. Construction traffic control measures at the project site would be incorporated into the project design and included as conditions of approval to ensure that public safety is ensured during the excavation operations. As such, these short-term construction impacts on any roadway segment or intersection within the project area would be less than significant.

4.17 Tribal Cultural Resources

Would the project:

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
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)?	☐	☐	☒	☐

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐

EXPLANATIONS:

a.i. and a.ii: Less Than Significant Impact

Pursuant to Assembly Bill 52, California tribes now have the ability to establish, through a formal notice letter, a standing request to consult with a lead agency regarding any proposed project subject to CEQA in the geographic area with which the tribe is traditionally and culturally affiliated. The Native American Heritage Commission has authority to verify the tribes' cultural affiliation. A lead agency must provide written notification to requesting tribes on its notice list within 14 days of a decision to undertake a project or a determination that a project application is complete. Notice to the tribes must include a brief project description, the project location, and the lead agency's contact information. A tribe then has 30 days to request consultation. If the tribe does not respond in that period or writes to decline consultation, the lead agency has no further obligation. The City of Imperial Beach sent the tribal notice to the tribal affiliate on March 7, 2019, and did not receive a response within the 30-day period.

4.18 Utilities and Service Systems

Would the project:

Issue	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☒	☐
b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐
c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐
d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☐	☒	☐
e. Result in a determination by the wastewater treatment provided 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?	☐	☐	☒	☐
f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☒	☐
g. Comply with federal, state, and local statutes and regulation related to solid waste?	☐	☐	☒	☐

EXPLANATIONS:

a: Less Than Significant Impact

The Metropolitan Sewerage System (Metro) treats wastewater from the City and 15 other cities and districts. The City operates its own collection system, which transports sewage to Metro's South Bay Interceptor. This interceptor conveys sewage to the Point Loma Wastewater Treatment Plant. The Point Loma plant processes approximately 160 million gallons a day of wastewater generated by 2.2 million residents in a 450-square-mile service area. An average of 180 million gallons of wastewater is treated every day by Metro. The Point Loma plant has a treatment capacity of 240 million gallons per day. The proposed facilities would be connected to the City's wastewater system. The incremental increase in wastewater generated by the project would be treated by Metro and would not exceed the existing capacity of the Point Loma Plant. Therefore, the project would not exceed applicable Regional Water Quality Control Board wastewater treatment requirements, and impacts would be less than significant.

b: Less Than Significant Impact

California American Water (CalAm) provides water service to the City, as well as the City of Coronado and portions of the cities of San Diego and Chula Vista. As a private water company, CalAm does not purchase water directly from the San Diego County Water Authority. Instead, CalAm purchases water from the City of San Diego. CalAm's contract agreement with the City of San Diego assures CalAm the right to purchase as much water as they require to supply its customers for an indefinite period of time. In the event of a drought, which would require water restrictions, the contract provides for the City of San Diego's and CalAm's customers to be restricted proportionately. The proposed facilities would be connected to the City's water system. The incremental increase in water demand generated by the project would not exceed the existing capacity of CalAm.

As described in Section 4.18(a) above, the incremental increase in wastewater generated by the project would be treated by Metro and would not exceed the existing capacity of the Point Loma plant. Therefore, the project would not require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, and impacts would be less than significant.

c: Less Than Significant Impact

As described in Section 4.9(a) above, the project would control storm water flows during construction by implementing site design, source control and structural BMPs consistent with the regulatory requirements of the City and NPDES (MS4 Permit). The project would require off-site connections to existing stormwater facilities; however, the project would not result in storm water flows that exceed the existing capacity of the City storm drain system, as 100-year peak flow runoff rate would be equal to the current condition with the inclusion of the BMPs identified in the SWQMP prepared for the project (REC 2018a and 2018b). Therefore, the project would not require construction of new storm water drainage facilities. Therefore, impacts related to water supply would be less than significant.

d: Less Than Significant Impact

As described in Section 4.18(b) above, the incremental increase in water demand generated by the project would not exceed the existing capacity of CalAm. Therefore, impacts related to water supply would be less than significant.

e: Less Than Significant Impact

As described in Section 4.18(a) above, the incremental increase in wastewater generated by the project would be treated by Metro and would not exceed the existing capacity of the Point Loma plant. Therefore, the project would not require or result in the construction of new storm water drainage facilities or expansion of existing facilities, and impacts would be less than significant.

f – g: Less Than Significant Impact

The City oversees solid waste services, which are provided by EDCO through a franchise agreement. Solid waste ordinances are jointly enforced to make sure waste is properly disposed. Solid waste generated in the City is primarily taken to the Otay Landfill located north of Interstate 905. The Otay Landfill is permitted to receive 5,830 tons per day, and has a remaining capacity of approximately 24.5 million cubic yards and a projected closure date of 2028 (California Department of Resources Recycling and Recovery 2018).

Construction of the project would generate debris requiring disposal. However, the project would comply with applicable federal, state, and local statutes and regulations regarding diversion of solid waste during construction and operation. Sufficient landfill capacity exists at the Otay Landfill to serve the proposed project. Therefore, impacts related to solid waste would be less than significant.

4.19 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 degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☒	☐
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable futures projects)?	☐	☐	☒	☐
c. Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

EXPLANATIONS:

a: Less Than Significant Impact

As described in Section 4.4, the project site is located in an urbanized area that does not feature any vegetation designated as sensitive species nor provide habitat for designated sensitive species. Similarly, the project site does not possess any riparian habitat or communities, nor any wetlands, wetland buffer areas, or non-wetland waters of the United States. Therefore, no impacts to sensitive species, riparian habitat, or wetlands would

occur. As described in Section 4.5, the project would not impact any historical resources. Therefore, impacts would be less than significant.

b: Less Than Significant Impact

As described in Sections 4.1 through 4.18, the project would not result in any significant environmental impacts. Consequently, the project's contribution to cumulative impacts would be less than significant.

c: Potentially Significant Unless Mitigation Incorporated

As described in Section 4.3, the project would not result in any substantial adverse direct or indirect impacts to human beings related to air quality. The project includes mitigation to reduce potential noise and hazards and hazardous material impacts to below a level of significance, as discussed in Sections 4.8 and 4.12. Therefore, impacts would be less than significant with mitigation.

5.0 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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Sean Bohac, Graphics Preparer, GIS Technician
Stacey Higgins, Technical Editor, Production Specialist

6.0 Sources Consulted

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