City of San Diego

SUBSEQUENT MITIGATED NEGATIVE DECLARATION

PRJ-1056938
SCH No. 2019060003

SUBJECT: **11085 Torreyana Road (Healthpeak Torreyana)**: A COASTAL DEVELOPMENT PERMIT, and NEIGHBORHOOD DEVELOPMENT PERMIT for the demolition of two existing research and development (R&D) buildings totaling 81,419 square feet (SF) and associated parking lots and walkways to construct two, two-level R&D buildings totaling up to 122,980 SF. Four potential development options are proposed: Option 1 with two new buildings totaling 111,000 SF, Option 2 with one new 105,532 SF building, Option 3 with the existing 40,000 SF building plus one new 49,200 SF building (89,200 SF total), and Option 4 with a new 61,800 SF building plus the existing 40,000 SF building (101,800 SF total). The project would provide surface parking as well as subterranean parking. Various site improvements would also be constructed, including an extended fire access lane, hardscape, and landscape. The project also includes a Multi-Habitat Planning Area (MHPA) Boundary Line Correction to remove a 0.13-acre portion of the site that was legally permitted and developed prior to adoption of the Multiple Species Conservation Plan Subarea Plan. A covenant of easement would be placed on all remaining Environmentally Sensitive Lands on the site. The 6.15-acre project site is located at 11085 and 11095 Torreyana Road. The site is designated Scientific Research within the University Community Plan and zoned Industrial Park (IP-1-1). Additionally, the project site is within the Airport Land Use Compatibility Overlay Zone (Marine Corps Air Station [MCAS] Miramar), the Airport Influence Area (MCAS Miramar-Review Area 1), the Airport Safety Zone (MCAS Miramar Accident Potential Zone 2), the Coastal Height Limitation Overlay Zone, the Coastal Overlay Zone (Appealable), the Community Plan Implementation Overlay Zone B, the 2035 Transit Priority Area, MHPA, the Very High Fire Hazard Severity Zone, First Public Roadway, Mobility Zone 2, and Prime Industrial Lands. LEGAL DESCRIPTION: Lot 8 of Torrey Pines Science Park, Unit No. 2, in the City of San Diego, County of San Diego, State of California, According to Map Thereof No. 8434, recorded December 10, 1976. ASSESSOR'S PARCEL NUMBER: 340-010-3000. APPLICANT: HCP Torreyana, LLC.

I. PROJECT DESCRIPTION:

See the attached Subsequent Initial Study.

II. ENVIRONMENTAL SETTING:

See attached Subsequent Initial Study.

III. DOCUMENTATION:

The attached Subsequent Initial Study documents the reasons to support the Determination.

IV. MITIGATION, MONITORING AND REPORTING PROGRAM (MMRP):

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

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

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

3. These notes must be shown within the first three (3) sheets of the construction documents in the format specified for engineering construction document templates as shown on the City website: http://www.sandiego.gov/development-services/industry/information/standtemp.

4. The TITLE INDEX SHEET must also show on which pages the "Environmental/Mitigation Requirements" notes are provided.

5. SURETY AND COST RECOVERY: The Development Services Director or City Manager may require appropriate surety instruments or bonds from private Permit Holders to ensure the long-term performance or implementation of required mitigation measures or programs. The City is authorized to recover its cost to offset the salary, overhead, and expenses for City personnel and programs to monitor qualifying projects.

B. GENERAL REQUIREMENTS – PART II Post Plan Check (After permit issuance/Prior to start of construction)

1. PRE-CONSTRUCTION MEETING is required ten (10) working days prior to beginning any work on this project. the permit holder/owner is responsible to arrange and perform this meeting by contacting the city resident engineer (RE) of the field engineering division and city staff from mitigation monitoring coordination (MMC). attendees must also include the permit holder's representative(s), job site superintendent, and the following consultant:

   Acoustician
   Biologist

Note: Failure of all responsible Permit Holder's representatives and consultants to attend shall require an additional meeting with all parties present.

Contact Information:

a) The primary point of contact is the RE at the Field Engineering Division – 858-627-3200

b) For clarification of environmental requirements, applicant is also required to call RE and MMC at 858-627-3360

2. MMRP COMPLIANCE: This Project, PRJ-1056938, shall conform to the mitigation requirements contained in the associated Environmental Document and implemented to the satisfaction of the DSD's Environmental Designee (MMC) and the City Engineer (RE). The requirements may not be reduced or changed but may be annotated (i.e., to explain when and how compliance is being met and location of verifying proof, etc.). Additional clarifying information may also be added to other relevant plan sheets and/or specifications as appropriate (i.e., specific locations, times of monitoring, methodology, etc.

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

3. OTHER AGENCY REQUIREMENTS: Evidence of compliance with all other agency requirements or permits shall be submitted to the RE and MMC for review and acceptance prior to the beginning of work or within one week of the Permit Holder obtaining documentation of those permits or requirements. Evidence shall include copies of permits, letters of resolution, or other documentation issued by the responsible agency:

   - National Pollutant Discharge Elimination System (NPDES) Municipal Storm Water Permit Compliance

   - NPDES General Construction Activity Permit for Storm Water Discharges Compliance

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

   Note: Surety and Cost Recovery – When deemed necessary by the Development Services Director or City Manager, additional surety instruments or bonds from the private Permit Holder may be required to ensure the long-term performance or

implementation of required mitigation measures or programs. The City is authorized to recover its cost to offset the salary, overhead, and expenses for City personnel and programs to monitor qualifying projects.

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

Document Submittal/Inspection Checklist

Issue Area	Document Submittal	Associated Inspection/Approvals/Notes
General	Consultant Qualification Letters	Prior to Preconstruction Meeting
General	Consultant Construction Monitoring Exhibits	Prior to or at Preconstruction Meeting
Bond Release	Request for Bond Release Letter	Final MMRP Inspections Prior to Bond Release Letter
Transportation	Verification Letter of Vehicle Miles Traveled Reduction Measures Implementation	Inspection to Verify Vehicle Miles Traveled Reduction Measures Implementation Prior to Issuance of First Occupancy Permit(s)
Noise	Verification Letters	Prior to the issuance of any construction permit
Biology*	Consultant Qualification Letters	Prior to the first preconstruction meeting
Biology*	Biologist Limit of Work Verification	Limit of Work Inspection
Land Use*	Land Use Adjacency Issues	Prior to the issuance of any construction permit, including demolition permit and grading permit

* While no mitigation measures are included for these issue areas, the project includes conditions of approval with submittals/inspection checklist items for these issues.

A. SPECIFIC MMRP ISSUE AREA CONDITIONS/REQUIREMENTS

Noise

NOI-1 Vibration-Sensitive Equipment

The project's construction equipment shall not generate vibration levels exceeding 65 vibration decibels (VdB) at off-site buildings that may contain vibration-sensitive equipment. One of the following options shall be implemented during construction to prevent impacts to vibration-sensitive equipment at surrounding land uses:

Prior to issuance of any construction permit (demolition permit, grading permit, building permit, etc.), the Permittee shall demonstrate via a written correspondence to the City Environmental Designee that the project meets one of the following qualifications:

- The structures within 232 feet of the proposed project site are vacant per written confirmation from the building Owner/Permittee, or no longer exist at the start of project construction.

- The applicant shall provide the City with written confirmation from the building Owner/Permittee of any buildings within 232 feet of the project that the building does not contain high-resolution lithographic equipment, optimal microscopes, or electron microscopes with vibration isolation systems.

- The project applicant demonstrates to the satisfaction of the City Environmental Designee via calculations from a qualified acoustician that project-specific construction equipment to be used would produce less than 65 VdB at off-site buildings that may contain vibration-sensitive equipment. This shall include a letter from the contractor to the Environmental Designee, certifying the equipment to be used shall be the same model and used in the same manner (mode and daily hours of operation) as assumed by the acoustician in the testing data or calculations.

Transportation/Circulation

TRA-1 Transportation/Circulation (Vehicle Miles Traveled)

Prior to the issuance of first occupancy permits for any new on-site buildings, the Permittee shall provide and maintain the following Vehicle Miles Traveled (VMT) Reduction Measures totaling at least 8 points of VMT reduction measures in accordance with the Mobility Choices Regulations (San Diego Municipal Code [SDMC] Chapter 14, Article 3, Division 11), Appendix T Mobility Choices Regulations: Implementation Guidelines. Implementation of these measures would minimize VMT impacts to the extent feasible.

1. Provide an on-site bicycle repair station (1.5 points).

2. Provide short-term bicycle parking spaces available to the public, at least 10% beyond minimum requirements. The minimum required per the SDMC is 16 spaces and 21 spaces will be provided (4.5 points).

3. Provide long-term bicycle parking spaces at least 10% beyond minimum requirements. The minimum required per the SDMC is 16 spaces and 18 spaces will be provided (2 points).

V. PUBLIC REVIEW DISTRIBUTION:

Draft copies or notices of this Subsequent Mitigated Negative Declaration (MND) were distributed to:

Federal
MCAS Miramar Air Station (13)
US Fish and Wildlife Service (23)

State
California Department of Fish and Wildlife (32)
State Clearinghouse (46)
California State Parks (40A)
California State Parks (40B)
California Coastal Commission (47)
California State Coastal Conservancy (54)

City
Mayor's Office (91)
Council Member La Cava, District 1 (MS 10A)
Development Services Department
- Development Project Manager
- EAS
- LDR Planning
- LDR Landscape
- Transportation
- Geology
- Engineering

Planning Department
- Plan Long-Range
- MSCP

Environmental Services Department
Fire-Rescue Department
San Diego Police Department
Transportation Development-DSD (78)
Development Coordination (78A)
Fire and Life Safety Services (79)
San Diego Fire- Rescue Department Logistics (80)
Central Library (81A)
North University Branch Library (81JJJ)
Historical Resources Board (87)
City Attorney Office (93)

Other Organizations, Groups, and Interested Individuals
Building Industry Association (158)
Sierra Club (165)
San Diego Canyonlands (165A)

Other Organizations, Groups, and Interested Individuals (cont.)
San Diego Bird Alliance (167)
Mr. Jim Peugh (167A)
California Native Plant Society (170)
Center for Biological Diversity (176)
Citizens Coordinate for Century 3 (179)
Endangered Habitats League (182A)
MSCP Reviewer (MS-5A)
South Coast Information Center (210)
San Diego Archaeological Center (212)
Save Our Heritage Organisation (214)
Ron Christman (215)
Clint Linton (215B)
Frank Brown-Inter-Tribal Cultural Resources Council (216)
Campo Band of Mission Indians (217)
San Diego County Archaeological Society, Inc. (218)
Native American Heritage Commission (222)
Kumeyaay Cultural Heritage Preservation (223)
Kumeyaay Cultural Repatriation Committee (225)
Native American Distribution (225 A-S)
University City Community Planning (480)
Editor, Guardian (481)
UCSD Physical and Community Planning (482)
Commanding General, Community Plans Liaison MCAS Miramar Air Station (484)
Deron Bear Chairman (485)
Debby Knight (487)
University City Library (488)
La Jolla Village Community Council (489)
Chamber of Commerce (492)
Clint Linton, Iipay Nation of Santa Ysabel
Lisa Cumper, Jamul Indian Village
John Flores, San Pasqual Band of Mission Indians
Lozeau Drury LLP
Richard Drury, Lozeau Drury LLP
Molly Greene, Lozeau Drury LLP
John Stump

VI. RESULTS OF PUBLIC REVIEW:

- [ ] No comments were received during the public input period.
- [ ] Comments were received but did not address the accuracy or completeness of the draft environmental document. No response is necessary, and the letters are incorporated herein.
- [x] Comments addressing the accuracy or completeness of the draft environmental document were received during the public input period. The letters and responses are incorporated herein.

Copies of the subsequent environmental document and associated project-specific technical appendices, if any, may be accessed on the City of San Diego's California Environmental Quality Act (CEQA) webpage at https://www.sandiego.gov/ceqa.

Dawna Marshall
Senior Planner, Development Services Department

October 28, 2025
Date of Draft Report

March 4, 2026
Date of Final Report

Analyst: D. Marshall

Attachments:
- Initial Study
- List of Acronyms
- Figure 1: Regional Location
- Figure 2: Aerial Photograph
- Figure 3: Existing Easements and MHPA
- Figure 4: MHPA Boundary Line Correction
- Figure 5: Site Plan
- Figure 6: Vegetation Communities and Sensitive Resources/Impacts

COMMENTS	RESPONSES
Marshall, Dawna **From:** Livia Borak Beaudin <livia@coastlawgroup.com> **Sent:** Tuesday, November 25, 2025 11:45 AM **To:** DSD EAS **Cc:** Kristen Northrop **Subject:** [EXTERNAL] 11085 Torreyana Road (Healthpeak Torreyana) / PRJ-1056938 **This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.** Good morning, A-1 Please accept the following comments on behalf of Coastal Environmental Rights Foundation. The proposed project is not adequately defined as it includes numerous variations and no stable, finite project description. A-2 In addition, the project will result in significant GHG emissions and VMT impacts. The CalEEMod output reveals emissions over the 900 MTCO2e annual CAPCOA threshold. The project will include natural gas and does not comply with the City's CAP decarbonization goals or transportation/VMT reduction goals. The City has not implemented the majority of its CAP goals and emissions increased during the last available reporting period. The City has not made any measurable progress on its CAP since that time and there is no reason to believe emissions have gone down since 2023. Rather, it is clear the City will not meet its CAP 2030 or 2035 goals. This project and its significant GHG emissions will only make it that much harder for the City to meet its GHG emissions goals – including decarbonization. A-3 A-4 A-5 Please add CERF to the interested parties list and include me on all future notices, including CEQA notices, for this project. Thank you. ~Livia *Livia Borak Beaudin (she/her)* **Coast Law Group LLP** 1140 South Coast Highway 101 Encinitas, California 92024 *telephone: 760.942.8505* *direct dial: 760-514-0165* *"Like music and art, love of nature is a common language that can transcend political or social boundaries."* – Jimmy Carter 1	**Response to Comment Letter A: Coastal Environmental Rights Foundation via Livia Borak Beaudin** A-1: The commenter asserts that the project is not adequately defined and has an unstable project description. The project description provided in the Subsequent Mitigated Negative Declaration (MND) is consistent with CEQA requirements, including CEQA Guidelines Section 15144, which acknowledges that environmental documents require some degree of forecasting and that agencies must use their best efforts to disclose all reasonably foreseeable impacts. Section 3.2 of the MND describes the four development options anticipated for the project site. Table 1, *Project Development Options*, describes and compares the development characteristics of each option, including the total proposed building square feet, the impact footprint, and distance to nearby receptors, including the Multi-Habitat Planning Area. This comparison demonstrates that Development Option 1 would be most impactful. The analysis completed in the MND addresses all potential environmental impacts of the project in accordance with CEQA. No revision to the environmental analysis is required. A-2: The commenter asserts that the project would result in significant GHG emissions and VMT impacts and would conflict with the City's goals related to decarbonization and VMT reduction. The City does not utilize the CAPCOA threshold referenced in this comment. Project impacts related to GHG and VMT were assessed according to the City's CEQA Significance Determination Thresholds, as discussed in MND Sections 6.6, Greenhouse Gas Emissions and 6.14, Transportation of the MND. As described in the City's CEQA Significance Determination Thresholds, the City may determine that a project's incremental contribution to a cumulative greenhouse gas (GHG) effect is not cumulatively considerable if the project complies with the requirements of a previously adopted GHG emission reduction plan pursuant to CEQA Guidelines Sections 15183.5(b), 15064(h)(3), and 15130(d). The City's Climate Action Plan was originally adopted by the City Council on December 15, 2015, and was most recently updated on August 2, 2022. Consistency with the CAP is demonstrated through land-use consistency and adherence to the CAP Consistency Regulations (San Diego Municipal Code Chapter 14, Article 3). As detailed in the MND, the project would be consistent with both the land use and CAP Consistency Regulations and, therefore, the project's greenhouse gas impacts would be less than significant. While the City's CAP identifies goals to reduce natural gas use with targets of a 45% reduction by 2030 and a 90% reduction by 2035, the CAP and associated CAP Consistency Regulations do not prohibit the proposed project from utilizing natural gas and the use of natural gas by the project is not in conflict with the CAP. Pertaining to the Vehicle Miles Travelled (VMT) issue, the Complete Communities: Housing Solutions and Mobility Choices Final Program Environmental Impact

COMMENTS	RESPONSES
	Report and associated Findings and Statement of Overriding Considerations (PEIR; SCH No. 2019060003) identified that new development in the City would result in significant VMT impacts. Consistent with this and in accordance with the City's CEQA Significance Determination Thresholds, the MND prepared for the proposed project identified that the project would result in significant VMT impacts. VMT impacts would be mitigated to the extent feasible through compliance with the City's Complete Communities Mobility Choices Program in accordance with the PEIR and associated Findings and Statement of Overriding Considerations. Refer to MND Section 6.14 for more information. No revisions to the environmental analysis are required. A-3: Citywide compliance with the CAP is beyond the scope or the project's abilities. This comment does not pertain to the adequacy of the proposed project environmental document or the impacts of the project. A-4: The commenter asserts that the project's significant GHG emissions would contribute to a Citywide failure to achieve the goals and emissions reduction targets set forth in the City's CAP. As indicated in Response A-2 above, the project's GHG emission impacts would be less than significant and would not significantly contribute to a cumulative impact. No revisions to the environmental analysis are required. A-5: This commenter was added to the interested parties list for this project, as requested.

SUBSEQUENT INITIAL STUDY CHECKLIST

1. INTRODUCTION

1.1 Subsequent Initial Study

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

1.2 Tiering Process

This environmental analysis is a Subsequent Initial Study for the proposed Healthpeak Torreyana Project (referred to as the "proposed project" or "project" throughout this document). This environmental analysis is tiered from the *Complete Communities: Housing Solutions and Mobility Choices Program EIR* in accordance with Sections 15152 and 15168 of the CEQA Guidelines and Public Resources Code Section 21094. See also CEQA Statutes 21068.5 regarding the definition of tiering. The *Complete Communities: Housing Solutions and Mobility Choices Program EIR* was prepared pursuant to Section 15168 of the CEQA Guidelines.

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

The CEQA concept of "tiering" refers to the evaluation of general environmental matters in a broad program-level EIR, with subsequent focused environmental documents for individual projects that implement the program. This environmental document incorporates by reference the discussions in the *Complete Communities: Housing Solutions and Mobility Choices Program EIR* and concentrates on project-specific issues. CEQA and the CEQA Guidelines encourage the use of tiered environmental documents to reduce delays and excessive paperwork in the environmental review process. This is accomplished in tiered documents by eliminating repetitive analyses of issues that were adequately addressed in the Program EIR and by incorporating those analyses by reference. See also CEQA Statutes Section 21068.5 for the definition of tiering.

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

1.3 Appropriateness of a Subsequent Initial Study

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

2. PROJECT INFORMATION

2.1 Project title/Project number: 11085 Torreyana Road (a.k.a. Healthpeak Torreyana / PRJ-1056938)

2.2 Lead agency name and address: City of San Diego, 550 W. C Street, MSDSD 2A, San Diego, California 92101

2.3 Contact person and phone number: Dawna Marshall, 619-687-5904

2.4 Project location: 11085 and 11095 Torreyana Road, San Diego, CA 92121

2.5 Project Applicant/Sponsor's name and address: HCP Torreyana, LLC, 420 Stevens Street, Solana Beach, CA 92075

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

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

2.8 Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement): N/A

3. PROJECT DESCRIPTION

3.1 Environmental setting and surrounding land uses:

The approximately 6.15-acre project site is located in the University Community Planning area in the northern portion of the City of San Diego (City), California (see Figure 1, *Regional Location*). The site is generally located east of the Pacific Ocean and west of Interstate (I-) 5, south of the city of Del Mar, and north of the community of La Jolla. The site is specifically located at 11085 and 11095 Torreyana Road, San Diego, CA 92121 (Accessor's Parcel Number 340-010-3000), north of the terminus of Torreyana Road (see Figure 2, *Aerial Photograph*). An existing access road off Torreyana Road currently provides driveway access to the existing uses. A total of 4.16-acres of the site is presently developed, and the existing development

includes two Research and Development (R&D) buildings totaling 81,419 square-feet (SF), a parking lot, walkways and landscaping.

A 2.8-acre open space easement occurs within the eastern portion of the site, as shown in Figure 3, *Existing Easements and MHPA*. The open space easement includes a previously impacted 25-foot landscape maintenance area adjacent to the current development footprint. This 25-foot landscape maintenance easement was originally established through an agreement made on February 14th, 1981, between Torrey Pines Properties Ltd. and the City of San Diego, and was adopted on February 17th, 1981, by City Council Resolution No. 253635. However, the landscape maintenance agreement had a 30-year term and expired on February 17th, 2011. A covenant of easement would be placed on all remaining Environmentally Sensitive Lands on the site in accordance with the Environmentally Sensitive Lands Regulations.

A 0.20-acre sliver of MHPA overlaps the northeastern edge of the project site. Approximately 0.13 acres of this area currently contains concrete landscape/retaining walls, patio, parking lot, landscaping, and irrigation associated with the existing development and does not contain sensitive habitat.

Surrounding land uses include open space to the north, east, and west and scientific research uses to the south. Recreational development, such as the Torrey Pines Golf Course, is located west of the site, and I-5 is located east of the site.

The site is designated Scientific Research within the University Community Plan and zoned Industrial Park (IP-1-1). Additionally, the project site is within the Airport Land Use Compatibility Overlay Zone (Marine Corps Air Station [MCAS] Miramar), the Airport Influence Area (MCAS Miramar-Review Area 1), the Airport Safety Zone MCAS Miramar (Accident Potential Zone [APZ] II), the Coastal Height Limitation Overlay Zone, the Coastal Overlay Zone (Non-Appealable – 1), the Community Plan Implementation Overlay Zone -B, the 2035 Transit Priority Area (TPA), the Very High Fire Hazard Severity Zone (VHFHSZ), First Public Roadway, Mobility Zone 2, and Prime Industrial Lands. Additionally, the site is located within an area served by existing public utilities, services and facilities.

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

A COASTAL DEVELOPMENT PERMIT (CDP) and NEIGHBORHOOD DEVELOPMENT PERMIT (NDP) to allow for the demolition of the 81,419 SF of R&D facility.

As shown in Figure 4, *MHPA Boundary Line Correction*, a Boundary Line Correction (BLC) would be processed to remove 0.13 acre of developed land from the MHPA. The other 0.07 acre of overlap occurs within the southern maritime chaparral protected by the existing open space easement. This 0.07-acre overlap would remain MHPA and would be protected through a covenant of easement.

Additionally, the project would provide a deed restriction regarding the maximum intensity limit of 50 people per acre for the project to comply with the APZ II requirements under the MCAS Miramar Airport Land Use Compatibility Plan (ALUCP).

The project application proposes four development options with varying amounts of demolition and construction (Table 1, *Project Development Options*).

Table 1
PROJECT DEVELOPMENT OPTIONS

	Development Option 1	Development Option 2	Development Option 3	Development Option 4
New Building SF (122,980 SF Entitled)	111,000 SF (2) New Buildings	105,532 SF (1) New Building	49,200 SF +(E) 40,000 SF =89,200 SF Total	61,800 SF +(E) 40,000 SF =101,800 SF Total
New Building Height, per Coastal Height Limit Proposition D	30 feet max	Same as Option 1	Same as Option 1	Same as Option 1
Impact Footprint Area (On Site)	141,400 SF	Same as Option 1	75,900 SF (all within footprint of Option 1)	67,200 SF (all within footprint of Option 1)
Deviations	N/A	N/A	N/A	N/A
Correction	MHPA Boundary Line Correction	Same as Option 1	Same as Option 1	Same as Option 1
Utilities/Infrastructure	Water/Sewer run between new building and the (E) access road	Same as Option 1	Same as Option 1	Same as Option 1
Planting Area Provided	9,216 SF	7,812 SF	4,260 SF	4,820 SF
Retaining Walls Length	1,050 linear feet (LF)	Same as Option 1	528 LF	539 LF
Retaining Walls Max Height	14.7 feet (Interior Facing)	Same as Option 1	Same as Option 1	6.7 feet
New Surface Parking	73 Spaces	70 Spaces	41 Spaces	34 Spaces
Distance of New Building from South Property Line	39 feet	111 feet	253 feet	Same as Option 1
Distance from generator to MHPA	115 feet	Same as Option 1	Same as Option 1	217 feet

	Development Option 1	Development Option 2	Development Option 3	Development Option 4
Work in Open Space Easement	Allowable uses including approximately 13,570 SF grading, 9,445 SF landscaping/brush management, and 1,729 SF paving	Same as Option 1	Allowable uses including approximately 7,388 SF grading, 4,940 SF landscaping/brush management, and 1,729 SF paving	Allowable uses including approximately 4,958 SF grading, 5,982 SF landscaping/brush management, and 0 SF paving

SF = square feet; N/A = not applicable; LF = linear feet

Under development Option 1, the project would demolish the two existing buildings to construct two, two-story scientific research buildings totaling up to 122,980 SF with 107,550 SF of subterranean parking. The buildings would have a maximum height of 30 feet and would not exceed the coastal zone's 30-foot height limit outlined in Section 132.0505 of the SDMC. Approximately 3.43 acres of hardscape and 2.72 acres of landscaping or undeveloped open space would also be provided. The project proposes to maintain and reconstruct the existing access driveway to current City standards (Figure 5, *Site Plan*).

Development Option 2 proposes to demolish both existing buildings and construct one new building on the site. Development Options 3 and 4 propose to demolish one of the existing buildings and construct a new, second building on the site. A comparison of the four development options is provided in Table 1 above. As shown in Table 1, Options 2 through 4 involve less square footage, have an equal or smaller impact footprint, and are equidistant or farther from nearby structures than Option 1. As a result, Option 1 involves the greatest intensity of development and is therefore addressed in the remainder of this document as the "project."

The surface parking would provide 73 parking spaces and the subterranean parking garages would provide 234 parking spaces. Of the total 307 parking spaces, 31 stalls would be electric vehicle (EV) charging and 31 stalls would be clean air/carpool. The project would also provide 6 motorcycle parking spaces and 39 bicycle parking spaces (21 short term and 18 long term).

Electricity and gas service would be provided by existing San Diego Gas & Electric (SDG&E) facilities at the site. Water and fire service laterals would be provided to connect to an existing City 12-inch water main located in Torreyana Road. Similarly, a sewer lateral would be provided to connect to an existing 10-inch City sewer main located in Torreyana Road. Captured runoff would be conveyed to five basins with proposed modular wetlands systems and storm water detention vaults before flowing to the existing storm drain at the project's northern boundary.

Grading would include approximately 60,000 cubic yards (CY) of cut and 1,000 CY of fill, for a total export quantity of 59,000 CY. Maximum cut slopes would be 16 feet with a maximum cut depth of 24 feet.

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

In accordance with the requirements of Public Resources Code 21080.3.1, the City of San Diego provided formal notifications to the Iipay Nation of Santa Ysabel, the Jamul Indian Village, and the San Pasqual Band of Mission Indians, which are traditionally and culturally affiliated with the project area, requesting consultation. Formal notification letters were sent via electronic mail on January 31, 2024. No request for tribal consultation was received.

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

4. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

5. **DETERMINATION** (TO BE COMPLETED BY LEAD AGENCY)

On the basis of this initial evaluation:

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

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

☐ The proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☒ The proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. A SUBSEQUENT MITIGATED NEGATIVE DECLARATION is required, but it must analyze only the effects that remain to be addressed.

☐ Although the proposed project could have a significant effect on the environment, 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, nothing further is required.

6. EVALUATION OF ENVIRONMENTAL IMPACTS

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

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

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

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

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

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

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

7. The discussion in each issue should include the following:

    - Discussion of potential project impacts
    - Applicable Complete Communities: Housing Solutions and Mobility Choices Program EIR mitigation measures assumed in the project
    - Significance determination after Complete Communities: Housing Solutions and Mobility Choices Program EIR mitigation measures
    - Additional project-level mitigation measures
    - Significance determination after all mitigation

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

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

6.1 Land Use

Would the project:

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

The project site is designated Industrial Employment per the General Plan and is designated Scientific Research and zoned IP-1-1 per the University Community Plan. The proposed R&D uses would be consistent with the land use designations and zoning. The project would comply with the MHPA Land Use Adjacency Guidelines and would not significantly impact any habitat or species protected under the Multiple Species Conservation Program (MSCP), as described in Section 6.3 below. Implementation of the project would not cause significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. No impact would occur.

The project site includes a 0.20-acre sliver of the MHPA which overlaps the northeastern edge of the site. The area where the MHPA overlaps the project site includes land that was developed prior to adoption of the MSCP Subarea Plan. To correct the mapping error that included the developed portion of the site in the MHPA, the proposed project includes processing a BLC as depicted in Figure 4. An MHPA correction would typically be considered by the City when it can be shown that there is a discrepancy between the adopted MHPA boundary and other mapping information (e.g., aerial photography, vegetation maps, topographic maps), which results in inclusion of existing developed areas in the MHPA due to the regional scale of the MHPA mapping (City of San Diego 2023). MHPA boundary corrections are allowed under the City's MSCP to rectify minor mapping inaccuracies at the project level and can processed with the project's discretionary or ministerial review. For a MHPA correction to be supported by City staff, it must be clearly demonstrated that 1) the proposed area to be corrected out was legally permitted prior to the adoption of the MSCP in March 1997; 2) no habitat, including wetlands, would be removed; 3) no buffer area (e.g., wetland buffer, wildlife corridor) would be impacted; and 4) removing the area from the MHPA would not avert the applicant from having to otherwise comply with the City's MSCP Land Use Adjacency Guidelines.

The MSCP Subarea Plan was adopted in March 1997 while the site was developed in 1981. Review of aerial photography supports this date, as shown in the 1980 and 1981 images in Biological Resources Letter Report (BRLR; Appendix C) Figure 6. In the 1980 photograph of the area, the current developed footprint had been cleared and the footprint or foundation of the building at 11095 is visible. In the 1981 photograph, Torreyana Road and both buildings had been built. Additional evidence of legal development is provided in the form of a scan of approved plans, provided in Attachment G of the BRLR. The area to be removed from the MHPA with this BLC

consists of the northeastern edge of the project site that was developed in 1980-1981 and currently contains concrete landscape/retaining walls, patio, parking lot, landscaping, and irrigation, including a small piece within the 25-foot landscape maintenance area. The 25-foot landscape maintenance area was previously impacted and fitted with permanent irrigation. A copy of the 1981 agreement that established the 25-foot landscape maintenance area is provided in Attachment G of the BRLR. The 1981 agreement refers to an obligation to replant it with flora, and repair and replace irrigation lines. No buffer area for wetlands or wildlife corridor would be impacted by this BLC because no wetlands were found onsite, and no wildlife corridor is known to occur adjacent to the project site or the BLC area. Removal of 0.13 acre of developed land within the development would not negatively impact nearby preserved land. Additionally, removing the 0.13-acre area of developed land from the MHPA would not avert the applicant from having to otherwise comply with the City's MSCP Land Use Adjacency Guidelines. Compliance with MSCP Land Use Adjacency Guidelines is further described in Appendix C and would be made conditions of the NDP.

Issue		Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
Issue 2:	Lead to the development of conversion of General Plan or community designated open space or prime farmland to a more intensive land use, resulting in a physical division of the community?	☐	☐	☐	☐	☒

The project site has a General Plan land use designation of Industrial Employment and Community Plan land use designation of Scientific Research. Although the project site is not designated for open space or prime farmland, the eastern portion of the project site contains an existing 2.8-acre biological open space easement with a 25-foot impacted landscape maintenance area along the western edge of the easement. As part of the project, there would be a new 2.41-acre Covenant of Easement created in compliance with current standards over the remaining undeveloped open space outside of the 25-foot landscape maintenance area. Select allowable site work would be added in the old 25-foot landscape maintenance area. The proposed buildings would be shifted toward the northwest so that they are set back at a greater distance from the open space than existing development. Therefore, the project would not result in the conversion of open space to a more intensive land use. The project would replace the existing R&D uses with new R&D uses and would not result in a physical division of a community. No impact would occur.

Issue		Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
Issue 3:	Result in land uses which are not compatible with an adopted airport land use compatibility plan?	☐	☐	☐	☒	☐

The project is located approximately five miles northwest of the MCAS Miramar Airport. According to the ALUCP for MCAS Miramar, the project site is located within an Air Installations Compatible Use Zone (AICUZ) Safety Zone, specifically APZ II, for MCAS Miramar (San Diego County Regional Airport Authority 2011). However, project implementation would not conflict with the APZ II designation. According to the MCAS Miramar ALUCP, R&D uses are conditionally compatible in the APZ II provided that the uses comply with a Floor Area Ratio (FAR) of 0.34 or less and do not exceed 50 people per acre. The project would have a FAR of 0.41; however, per Policy 3.4.6(c) of the MCAS Miramar ALUCP, FAR limitations may be exceeded provided that the project meets the applicable maximum intensity limits (people per acre), provides a deed restriction regarding the maximum intensity limits for the project, and meets the applicable local agency parking requirements consistent with the maximum intensity limits for the project. Additionally, the project is required to submit a NDP to demonstrate compliance with these requirements, which are discussed in the following paragraphs.

The maximum number of people for the proposed project site would be restricted to 307 people based on the occupancy permit. With a total acreage of 6.15 acres and 307 people, this would be 50 people per acre, and the project would therefore comply with the APZ II.

As part of the requirements under the APZ II zone, the project would provide a deed restriction regarding the maximum intensity limits for the project and would therefore comply with the APZ II.

The project would provide parking at a ratio of one parking space per person, for a total of 307 parking spaces. Section 142.0530 of the SDMC establishes minimum and maximum allowed parking ratios. For R&D uses, the minimum allowed parking ratio is 2.1 spaces per 1,000 SF of floor area and the maximum allowed parking ratio is 4.0 spaces per 1,000 SF of floor area. The project is entitled for 122,980 SF of floor area and would provide 307 parking spaces, resulting in a parking ratio of 2.5. This is within the parking ratio range established in the SDMC, so the project would meet the applicable local agency parking requirements consistent with the maximum intensity limits for the project. The project would comply with the requirements of the APZ II.

As such, the project would not result in land uses that are incompatible with an adopted ALUCP. Impacts would be less than significant.

6.2 Air Quality

Would the project:

Issue		Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
Issue 1:	Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	☒	☐

The project site is located within the San Diego Air Basin (SDAB), which is governed by the San Diego County Air Pollution Control District (SDAPCD). The SDAPCD develops and administers local regulations for stationary air pollutant sources within the SDAB, and also develops plans and

programs to meet attainment requirements for both federal and state ambient air quality standards (National Ambient Air Quality Standards [NAAQS] and California Ambient Air Quality Standards [CAAQS], respectively). The current regional air quality plan for the NAAQS is the SDAPCD's 2020 Plan for Attaining the National Ambient Air Quality Standards for Ozone in San Diego County (Attainment Plan; SDAPCD 2020) and the current regional air quality plan for the CAAQS is SDAPCD's *2022 Revision of the Regional Air Quality Strategy* (RAQS; SDAPCD 2022). These plans accommodate emissions from a variety of sources, including natural sources, through implementation of control measures, where feasible, on stationary sources to attain the standards. Mobile sources are regulated by the U.S. Environmental Protection Agency (USEPA) and California Air Resources Board (CARB), and the emissions and reduction strategies related to mobile sources are considered in the Attainment Plan and RAQS.

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

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

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

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

Issue		Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
Issue 2:	Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☐	☒	☐

The project would generate criteria pollutants in the short-term during construction and the long-term during operation. The project's criteria pollutant emissions were calculated using the California Emissions Estimator Model (CalEEMod) Version 2022.1 and the full modeling output is provided in Appendix A.

Construction Emissions

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

Construction emissions calculated using CalEEMod Version 2022.1 are provided in Appendix A. The results of the calculations for project construction are shown in Table 2, *Estimated Maximum Daily Construction Emissions*. Construction was assumed to take place over approximately 14 months, and the CalEEMod default construction schedule and equipment were used. The analysis assessed total annual emissions from individual construction activities, including demolition, site preparation, grading, building construction, paving, and architectural coatings. The modeling assumes implementation of standard required dust control measures in accordance with SDAPCD Rule 55, including watering two times daily during grading, ensuring that all exposed surfaces maintain a minimum soil moisture of 12%, and limiting vehicle speeds on unpaved roads to 15 miles per hour. The project would also comply with the requirements of SDAPCD Rule 67 by using low-VOC coatings with a content of 50 grams per liter. The quantities of coatings that would be applied to the interior and exterior of the new buildings were estimated according to CalEEMod default assumptions.

Table 2
ESTIMATED MAXIMUM DAILY CONSTRUCTION EMISSIONS

Construction Year	Pollutant Emissions (pounds per day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
2025	3.4	52.3	31.6	0.2	11.0	5.2
2026	28.7	10.6	14.8	<0.1	0.9	0.5
Maximum Daily Emissions	**28.7**	**52.3**	**31.6**	**0.2**	**11.0**	**5.2**
SDAPCD Thresholds	*137*	*250*	*550*	*250*	*100*	*55*
Significant Impact?	***No***	***No***	***No***	***No***	***No***	***No***

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

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

Operational Emissions

Long-term operational sources of pollutant emissions include area, energy, mobile (transportation), and stationary sources. Operational emissions from area sources include engine emissions from landscape maintenance equipment and VOC emissions from repainting of buildings and consumer products. As previously discussed, the project would use low-VOC coatings in accordance with SDAPCD Rule 67. Energy source emissions include the combustion of natural gas for heating and hot water. The model-calculated default for natural gas usage was used for the emissions estimates.

Operational emissions from mobile sources are associated with project-generated vehicle trips. According to the VMT Assessment prepared for the project by Linscott Law & Greenspan Engineers (LLG; Appendix B), the project would generate 984 average daily trips (ADT). In the absence of specific weekend trip rates, the weekday trip rate of 8 trips per 1,000 SF was applied to Saturday and Sunday trips. The mobile emissions below are therefore a conservative estimate of project emissions. CalEEMod default vehicle speeds, trip purpose, and trip distances were applied to the trips. Model output data sheets are included in Appendix A. Table 3, *Estimated Maximum Daily Operational Emissions*, presents a summary of maximum daily operational emissions for the proposed project.

Table 3
ESTIMATED MAXIMUM DAILY OPERATIONAL EMISSIONS

Category	Pollutant Emissions (pounds per day)					
	VOC	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Area	3.7	<0.1	5.3	<0.1	<0.1	<0.1
Energy	<0.1	1.1	0.9	<0.1	<0.1	<0.1
Mobile	3.8	2.8	27.0	<0.1	5.9	1.5
Maximum Daily Emissions[1]	**7.5**	**3.8**	**33.2**	**<0.1**	**6.0**	**1.6**
SDAPCD Thresholds	*137*	*250*	*550*	*250*	*100*	*55*
Significant Impact?	***No***	***No***	***No***	***No***	***No***	***No***

Source: Appendix A

[1] Totals and differences may not compute due to rounding.

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

As shown in Table 3, the emissions of all criteria pollutants and ozone precursors associated with the operation of the project would be below the daily thresholds. Additionally, this analysis does not consider the emissions of the existing R&D uses on the project site; the project's net increase in emissions would be lower than the quantities shown in Table 3 above. Therefore, the operation of the project would not result in a significant impact on air quality.

The region is a federal and/or state nonattainment area for PM_{10}, $PM_{2.5}$, and ozone. The project would contribute particulates and the ozone precursors VOC and NO_X to the area during project construction and operation. As described above, emissions during both construction and operations would not exceed regional thresholds and would not violate an air quality standard or contribute

substantially to an existing or projected air quality violation. Therefore, emissions would not be cumulatively considerable, and impacts would be less than significant.

Issue		Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
Issue 3:	Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☐	☒	☐

Sensitive receptors (i.e., children, senior citizens, and acutely or chronically ill people) are more susceptible to the effects of air pollution than are the general population. Land uses that are considered sensitive receptors typically include residences, schools, playgrounds, childcare centers, hospitals, convalescent homes, and retirement homes. The nearest sensitive receptors to the project site are a hotel and golf course located west of North Torrey Pines Road, approximately 0.4 mile from the project site. An analysis of the project's potential to expose sensitive receptors to pollutants during construction and operation is provided below.

Carbon Monoxide Hotspots

Localized air quality effects occur when emissions from vehicular traffic increase in local areas. The primary mobile source pollutant of local concern is CO, which is a direct function of vehicle idling time and, thus, traffic flow conditions. CO transport is extremely limited; it disperses rapidly with distance from the source under normal meteorological conditions. However, under certain extreme meteorological conditions, CO concentrations proximate to a congested roadway or intersection may reach unhealthful levels affecting local sensitive receptors. Typically, high CO concentrations are associated with roadways or intersections operating at unacceptable levels of service or with extremely high traffic volumes.

To verify that the project would not cause or contribute to a violation of the CO standards, a screening evaluation of the potential for CO hotspots was conducted using the County of San Diego screening threshold of 3,000 peak trips (County of San Diego 2007). Based on the VMT Assessment prepared for the project (Appendix B), there would be approximately 157 AM peak hour trips and 138 PM peak hour trips, which would be minimal in comparison to the screening threshold of 3,000 peak trips. Therefore, the project would not result in a CO hotspot and would result in a less than significant impact.

Exposure to Toxic Air Contaminants

Construction

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

effects. For this reason, although other pollutants would be generated, DPM would be the primary pollutant of concern.

There would be relatively few pieces of off-road, heavy-duty diesel equipment operating at a given time during project construction. Further, the project includes multiple components at different areas throughout the project site, and construction equipment would not be operating in a single location with the potential to affect a given receptor for the entire duration of project construction. As shown above in Table 2, the highest daily emission of PM_{10} (which includes equipment emissions of DPM) during construction would be approximately 11.0 pounds per day in 2025, which would be well below the 100 pounds per day significance level threshold. As discussed above in Section 6.2, Issue 1, these significance level thresholds were developed with the purpose of attaining the NAAQS and CAAQS, which identify concentrations of pollutants in the ambient air below which no adverse effects on the public health and welfare are anticipated. Combined with the highly dispersive properties of diesel PM, construction-related emissions would not expose sensitive receptors to substantial emissions of TACs considering the significant distance of 0.40 mile. Impacts from construction emissions would be less than significant.

Operation

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

Issue		Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
Issue 4:	Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☐	☒	☐

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

During project operation, the temporary storage of refuse could be a potential source of odor; however, project-generated refuse is required to be stored in covered containers and removed at regular intervals in compliance with the SDMC solid waste regulations, thereby precluding significant odor impacts. Furthermore, the proposed project would be required to comply with SDAPCD Rule 51, which prohibits the discharge of odorous emissions that would create a public nuisance. As

such, long-term operation of the proposed project would not create objectionable odors affecting a substantial number of people. Impacts would be less than significant.

6.3 Biological Resources

Would the project:

Issue		Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
Issue 1:	Result in a substantial adverse impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in the Multiple Species Conservation Program or other local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒	☐

Athena Consulting prepared a Biological Resources Letter Report (BRLR) dated September 2025 for the proposed project (Appendix C). The BRLR was prepared in accordance with City's Biology Guidelines, Multiple Species Conservation Program (MSCP), and the CEQA requirements. The BRLR included a biological database search, three site surveys, and a Crotch's bumble bee habitat assessment by a qualified biologist (see qualifications in Attachment A of the BRLR). The discussion below is based on this report.

Vegetation Communities

The existing biological resources on the project site are shown in Figure 6, *Vegetation Communities and Sensitive Resources/Impacts*. As described in Section 3.2 and 6.1 above, a 0.20-acre area of MHPA overlaps the northeastern edge of the project site due to a mapping error. Of this overlap, 0.13 acre currently contains Tier IV developed area consisting of concrete landscape/retaining walls, patio, parking lot, landscaping, and irrigation associated with the existing development. A BLC is proposed as part of the project to correct the mapping error and remove the 0.13 acre of developed land from the MHPA. The remaining 0.07 acre of MHPA consists of southern maritime chaparral protected by the existing open space easement. This 0.07-acre overlap would remain MHPA and would be protected under the project's proposed covenant of easement.

The proposed project would result in direct impacts to 4.16 acres of developed land, also known as disturbed land, which is classified as Tier IV land in the City's Biology Guidelines (City 2018). Pursuant to the City's Significance Determination Thresholds (City 2022a), impacts to Tier IV land are not considered significant and do not require mitigation. As such, impacts to 4.16 acres of disturbed land are not considered significant, and mitigation is not required.

Project construction would occur immediately adjacent to sensitive upland habitat. The project would be required to implement the MSCP Land Use Adjacency Guidelines as detailed in Appendix C, as conditions of project approval to ensure the avoidance of sensitive habitats located immediately adjacent to construction work areas.

The project permit has been conditioned to incorporate bird-safe glass into the design to reduce potential window collisions by birds. The methods to be utilized would be consistent with the guidance provided in the USFWS publication Low-Cost Methods to Reduce Bird Collisions with Glass, prepared June 4, 2021 (https://www.fws.gov/media/low-cost-methods-reduce-bird-collisions-glass). Window collision impacts would be less than significant.

The site is already developed with similar Research and Development uses and serviced by existing roads. The project does not propose any roadway construction through a wildlife corridor area or substantially change traffic through a wildlife corridor area that would introduce a wildlife collision issue.

Therefore, potential indirect impacts to adjacent sensitive habitat would be avoided.

Special-Status Species

Species that are considered sensitive biological resources consist of those listed as rare, endangered, or threatened under Section 670.2 or 670.5, Title 14, California Code of Regulations or the Federal Endangered Species Act, Title 50, Code of Federal Regulations, Section 17.11 or 17.12, or candidate species under the California Code of Regulations; narrow endemic species as listed in the Biology Guidelines, or covered species as listed in the City's Multiple Species Conservation Plan Subarea.

The proposed project grading and development would be limited to the existing developed and disturbed areas, and would avoid significant impacts to sensitive species. Project impacts on special-status plant and animal species are described below.

Special-Status Plant Species

As shown in Figure 6, four special-status plant species were observed on the project site during the general biological survey, including wart-stemmed ceanothus (*Ceanothus verrucosus*), coast barrel cactus (*Ferocactus viridescens*), Torrey pine (*Pinus torreyana*), and Nuttall's scrub oak (*Quercus Dumosa*). None of these species are federally listed, state listed, or City narrow endemic plant species. Wart-stemmed ceanothus is listed as California Rare Plant Rank (CRPR) 2B.2 and is covered under the MSCP. Coast barrel cactus is listed as CRPR 2B.1 and is covered under the MSCP. Torrey pine is listed as CRPR 1B.2 and is covered under the MSCP. Nuttall's scrub oak is listed as CRPR 1B.1 and is not an MSCP-covered species. Generally, impacts to plant species with a CRPR of 1 or 2 are considered potentially significant, whereas CRPR 3 and 4 species are relatively widespread, and impacts to such species would not substantially reduce their populations in the region and are not typically significant. Snake cholla (*Cylindropuntia californica*), a City narrow endemic plant species, was also detected in the open space adjacent to the project's development area. Showy island snapdragon (*Gambelia speciosa*) is a rare plant species with a limited natural range in the Channel Islands; in the 2025 survey, individuals were observed on the site as part of recent landscaping

additions. Because these individuals are well outside their natural range and part of the site's landscaping, they are not considered sensitive in this analysis.

In addition to the observed species, one other special-status plant species, Ashy spike-moss (*Selaginella cinerascens*), was determined to have a high potential to occur within offsite Diegan coastal sage scrub to the northeast. Two sensitive plant species that could occur in the project's open space but would not have been detectable during the biological surveys are short-leaf dudleya (*Dudleya brevifolia*) and variegated dudleya (*D. variegata*). No spring focused plant surveys were conducted because the native habitat in the eastern open space would be preserved and protected from impacts; however, these two species are assumed to be present for the purposes of this analysis.

The proposed project is limited to existing developed and disturbed areas and impacts to native habitats with the potential to support these species would not occur. No naturally occurring special-status plant species were documented within the impact footprint. Therefore, no significant impact to any special-status plant species would occur.

Torrey pine within the project site consists of 29 cultivated trees that were planted as part of the mitigation efforts of the previous development. While these do not represent a naturally occurring population, they must be replaced considering they were planted as mitigation. The proposed project would remove 19 Torrey pine and replace them with 19 Torrey pine (Appendix C).

The project site contains four Nuttall's scrub oaks along the southern and southeastern edge of the existing developed area. The four Nuttall's scrub oaks have grown in a previously developed area, and their potential loss would not be considered a significant impact.

Special-Status Animal Species

No special-status animal species were detected within the project site during the general biological survey. The following species were determined to have a moderate potential to occur in the onsite southern maritime chaparral: Belding's orange-throated whiptail (*Aspidoscelis hyperythra beldingi*), Coronado skink (*Plestiodon skiltonianus interparietalis*), and northwestern San Diego pocket mouse (*Chaetodipus fallax fallax*). Crotch's bumble bee (*Bombus crotchii*), a California Endangered Species Act candidate species, has a low potential to occur in the project development area and a moderate to high potential to occur in the southern maritime chaparral and surrounding natural habitat. No suitable Diegan coastal sage scrub habitat exists on the project site to support coastal California gnatcatcher (*Polioptila californica californica*); however, coastal California gnatcatcher has a moderate potential to occur in the coastal sage scrub vegetation to the northeast of the project site. As stated above, the project would take place within the existing development footprint of the project site, where no sensitive animal species have been detected, and would not impact the native habitat to the east or nearby offsite habitat. Therefore, the project would not directly impact the sensitive species with a potential to occur in the project vicinity.

The project would not result in direct impacts to Diegan coastal sage scrub. Therefore, no direct impacts to the coastal California gnatcatcher or suitable gnatcatcher habitat would occur. However, the offsite habitat to the northeast contains suitable gnatcatcher habitat. The project would be required to comply with the standard MHPA Land Use Adjacency Guidelines, which include measures to avoid potential indirect impacts to coastal California gnatcatcher within the MHPA.

Monitoring noise levels adjacent to offsite MHPA coastal sage scrub habitat to the northeast would be required by the City if construction or other loud activities were to be scheduled during the coastal California gnatcatcher breeding season (March 1–August 15). As a condition of project approval, pre-construction surveys for the coastal California gnatcatcher would be required to determine species presence/absence if construction were to occur during the gnatcatcher breeding season. If surveys are not conducted, the presence of the species would be assumed, and the implementation of noise attenuation and biological monitoring would be required during the gnatcatcher breeding season if construction would generate noise levels higher than 60 dBA or ambient (whichever is higher). Therefore, potential indirect impacts to coastal California gnatcatcher would be avoided.

Although it was determined that the Crotch's bumble bee has a moderate to high potential to occur in the onsite southern maritime chaparral, where foraging, nesting, and possible overwintering could occur, the project would take place within the current development footprint, which lacks suitable habitat for nesting and overwintering. The habitat assessment completed by the qualified biologist identified that the development impact footprint area did not provide suitable habitat for Crotch's bumble bee and bumblebee surveys were not warranted. As such, the project would not result in any significant impact to nesting habitat, potential nest sites, potential overwintering habitat, or potential overwintering sites of the Crotch's bumble bee.

Crotch's bumble bee foraging resources also occur further to the east, outside of the impact area and within the proposed open space for the project, and in nearby offsite scrub habitat. The project would be required to implement standard avoidance and minimization measures as conditions of project approval to ensure potential foraging resources located immediately adjacent to construction work areas within the proposed open space are avoided during construction. Given the fact that the flowering species found within the impact area are not considered significant foraging habitat for the Crotch's bumble bee and given the abundance of better-quality foraging resources available for the species outside of the proposed impact area, project impacts on potential foraging habitat for the Crotch's bumble bee would be less than significant.

In conclusion, impacts to sensitive species would be less than significant.

Issue		Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
Issue 2:	Result in a substantial adverse impact on any Tier I Habitats, Tier II Habitats, Tier IIIA Habitats, or Tier IIIB Habitats as identified in the Biology Guidelines of the Land Development Manual or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☐	☒

As discussed in Section 6.3, Issue 1 above, the project would result in impacts to 4.16 acres of developed land. Pursuant to the City's Significance Determination Thresholds (City 2022a), impacts to Tier IV developed land are not considered significant and do not require mitigation. As such, no impact would occur.

Issue		Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
Issue 3:	Result in a substantial adverse effect on federally protected wetlands (including but not limited to marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☐	☒

No waterways, wetlands, or riparian habitat potentially subject to U.S. Army Corps of Engineers, Regional Water Quality Control Board, and/or California Department of Fish and Wildlife jurisdiction were observed during project surveys (Appendix C). Therefore, no impact would occur to jurisdictional wetlands and waterways.

Issue		Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
Issue 4:	Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	☒	☐

The project site is located within the Los Peñasquitos Lagoon/Del Mar Mesa/Peñasquitos Canyon core biological resource area, and project's impact area is adjacent to the MHPA. However, the proposed project is limited to existing developed and disturbed areas and would not result in the introduction of new land uses within the MHPA or core biological resource area. As such, the proposed project would not substantially alter current baseline conditions for local wildlife movement within and around the project area.

The project would not create any barriers to wildlife movement and would not impede wildlife movement or the use of native nursery sites. Therefore, impacts would be less than significant.

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

The project has been specifically designed to minimize impacts to biological resources addressed in the City's MSCP Subarea Plan (1997) and Land Development Code (2018). The project would be consistent with the MSCP and impacts to 4.16 acres of developed land are not considered significant in accordance with Land Development Code requirements, as detailed in Section 6.3, Issue 2. The project would not conflict with the local, regional, or state conservation plans.

The project is subject to City's MHPA Land Use Adjacency Guidelines designed to minimize edge effects to sensitive resources contained in the MHPA. Compliance with the MHPA Land Use Adjacency Guidelines is a condition of project approval. Impacts would be less than significant.

Issue		Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
Issue 6:	Result in a conflict with the provisions of any local policies or ordinances protecting biological resources?	☐	☐	☐	☒	☐

The project site contains southern maritime chaparral, which is one of the communities categorized as Environmentally Sensitive Habitat Area (ESHA). This habitat is located entirely within the proposed open space easement. Five sensitive species, including wart-stemmed ceanothus, coast barrel cactus, Torrey pine, Nuttall's scrub oak, and snake cholla, are known to occur within this community. Short-leaf dudleya and variegated dudleya are also assumed to exist in the project's open space. Southern maritime chaparral is considered a rare habitat, and this community is easily disturbed/degraded by human activities.

The project activities would be limited to the site's existing impact area and would not result in direct impacts to southern maritime chaparral within the open space easement. Per the City's Biology Guidelines (City 2018), impacts to 4.16 acres of Tier IV developed land would not be considered significant and would not require mitigation.

The project would provide protection to the habitats within the MHPA and would not conflict with any of the Local Coastal Program (LCP) Specific Language in the University Community Plan and LCP (City 2024a) or the University-La Jolla LCP Addendum related to ESHA (City 1981).

Pursuant to the City Land Development Code ESL Regulations (City 2018) and MSCP implementing agreement (City 1997), a new 2.41-acre covenant of easement shall be placed over the existing easement to further protect the remaining open space ESL and MHPA. The easement shall include only the remaining biological resources and natural steep hillsides.

Steep hillsides, defined as slopes greater than 25%, are present within the project site. As described in Section 142.0142 of the SDMC (City 2018), within the Coastal Overlay Zone, steep hillsides shall be preserved in their natural state. When encroachment onto such steep hillsides is unavoidable, encroachment shall be minimized; except that encroachment is permitted in such steep hillsides to provide for a development area (including Zone 1 brush management) of up to a maximum of 25% of the premises on premises containing less than 91% of such steep hillsides.

The project proposes no additional impacts to steep hillsides within the project site. The existing site is already developed within the maximum of 25% of steep hillsides and the project proposes to develop within the existing 25% of steep hillsides; therefore, the project would not conflict with the Development Regulations for Steep Hillsides in the SDMC. Furthermore, any increase in runoff resulting from the development of the site shall be directed away from any steep hillside areas and either into an existing or newly improved public storm drain system or onto a street developed with a gutter system or public right of way designated to carry surface drainage runoff. Impacts would be less than significant.

6.4 Energy

Would the project:

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

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

throughout the duration of construction, presumably in gasoline-powered vehicles. While construction activities would consume petroleum-based fuels, consumption of such resources would be temporary and would cease upon the completion of construction.

Once operational, the project would result in R&D uses similar to the existing uses on the project site and in the surrounding area. Operation of the project would not require a significant increase in energy usage over the existing energy demand for the existing R&D uses at the site. Additionally, long-term energy usage from the buildings would be reduced through mandatory design measures outlined in the 2022 Building Energy Efficiency Standards Title 24, Part 6 established by the California Energy Commission (CEC; 2025). The project would incorporate required energy conservation features in heating, ventilation and air conditioning systems, lighting and window treatments, and insulation and weather stripping. The project would also incorporate Title 24 requirements for cool-roofing materials (Section 140.3) and solar panels (Section 140.10). Activities occurring at the site would be consistent with zoning of IP-1-1 and land use designation of Scientific Research. Therefore, the project would not result in wasteful, inefficient, or unnecessary consumption of energy sources during project construction or operation. Impacts would be less than significant.

Issue		Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
Issue 2:	Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐	☒	☐

First, the project is consistent with the site zoning and land use designations and is within a TPA. The CAP Consistency Regulations (City 2024b) specify tree planting requirements to combat the heat island effect and promote carbon sequestration. The project would protect 10 existing trees on the project site, 13 trees adjacent to the site, and would plant an additional 56 trees. At least 50% of the project's short term and long term bicycle parking spaces would be supplied with electrical outlets for electric charging for each bicycle parking spaces also include electric vehicle charging stations, and trash and recycling receptacles consistent with the CAP Consistency Regulations. The project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency, and impacts would be less than significant.

6.5 Geology/Soils/Seismicity

Would the project:

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

The discussion below is based on the Geotechnical Investigation prepared by Geocon Incorporated (Geocon) for the proposed project (Appendix D) dated April 2022. The study includes a review of geologic literature, completion of engineering analyses, soil sampling, and laboratory testing.

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

While there are no known active faults that cross the project site, there are several active faults that run throughout San Diego County. There are multiple small fault lines occurring as close as 0.8 mile from the project site, with the Newport-Inglewood-Rose Canyon fault zone occurring approximately 2.8 miles west of the project site. The project site is within a seismically active area and, therefore, can be subject to strong seismic ground motion.

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

The Geotechnical Investigation prepared for the project did not observe evidence of previous or recent slope instability at the project site or on the descending slopes adjacent to the project site.

Implementation of the project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake

fault, strong seismic ground shaking, seismic-related ground failure, including liquefaction, or landslides. The project would be required to comply with seismic requirement of the California Building Code (CBC; California Department of General Services 2025), utilize proper engineering design and standard construction practices, to be verified at the building permit stage, in order to ensure that would reduce impacts to people or structures to an acceptable level of risk. The project would be conditioned to comply with a final geotechnical investigation that is prepared by a qualified geologist and approved by the City prior to building permit issuance that demonstrates compliance with the CBC and local requirements. Impacts would be less than significant.

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

Soil exposed by construction activities, such as grading, could be subject to erosion if exposed to heavy rain, winds, or other storm events. Construction of the proposed project would involve a variety of heavy equipment associated with intensive earthwork, structural, and paving phases. The project would be required to comply with the City's Storm Water Standards (City 2024c), which require the implementation of appropriate best management practices (BMPs). Grading activities would be required to comply with the City of San Diego Grading Regulations in Chapter 14, Article 2, Division 1 of the SDMC (City 2021a) as well as the Storm Water Standards and the project's Stormwater Quality Management Plan (SWQMP; Appendix E), which would ensure soil erosion and topsoil loss is minimized to less than significant levels. The project proposes four Modular Wetlands Systems that would capture, treat, and release project runoff at a slower rate than existing conditions; this would help minimize surface flows and soil erosion on the site in conformance with local and state requirements. Therefore, the project would not result in substantial soils erosion or loss of topsoil; therefore, impacts would be less than significant.

Issue		Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
Issue 3:	Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☐	☒	☐

As discussed in Section 6.5, Issue 1 above, the potential for liquefaction and seismically induced settlement occurring at the site is considered negligible, and landslides would not be a concern for the project. Therefore, impacts related to lateral spreading would be less than significant. Additionally, the potential for ground rupture at the project site is considered to be negligible due to the absence of active faults at the subject site. Seismic design of structures would be required to be evaluated in accordance with the CBC guidelines currently adopted by the City and comply with

applicable regulations. The project would not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and impacts would be less than significant.

Issue		Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
Issue 4:	Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☐	☒	☐

According to the Geotechnical Investigation prepared for the project site, the soil encountered in the field investigation is classified as having "Very Low" to "Medium" expansion potential as defined by the American Society for Testing and Materials D 4829 Expansion Index Test (Appendix D). Per the recommendation in the Geotechnical Investigation, the upper portion of the previously placed fill would be removed and replaced as compacted fill to reestablish proper moisture content and provide suitable fill for support of planned improvements. Scripps Formation and Ardath Shale are suitable for the support of proposed fill and structural loads. Therefore, impacts related to expansive soil would be less than significant.

6.6 Greenhouse Gas Emissions

Would the project:

Issue		Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
Issue 1:	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☐	☒	☐

The City's Significance Determination Thresholds state that for project-level environmental documents, the significance of impacts related to GHG emissions is determined through land use consistency analysis and the project's compliance with the regulations set forth in the CAP Consistency Regulations (SDMC Chapter 14, Article 3, Division 14). Projects that are consistent with the CAP (City 2022b), as determined through land use consistency and compliance with the CAP Consistency Regulations, may rely on the CAP for the cumulative impacts analysis of GHG emissions.

The first step in determining CAP consistency for development projects is to assess the project's consistency with the growth projections used in the development of the CAP. Since the proposed project is consistent with the existing General Plan and Community Plan land use and zoning designations, the project is consistent with the assumptions included in the CAP.

The second step in demonstrating consistency with the CAP is the implementation of the regulations set forth in SDMC Chapter 14, Article 3, Division 14 to ensure that new development is consistent with the CAP's assumptions for relevant CAP strategies toward achieving the identified GHG reduction targets. As described in Section 6.4, Issue 2, the project is consistent with the CAP Consistency Regulations and would provide the GHG-reducing features required therein.

Since the project would be consistent with the planned land use and the CAP Consistency Regulations, the project would not result in GHG emissions that would have a significant impact on the environment. Impacts would be less than significant.

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

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

6.7 Health and Safety

Would the project:

Issue		Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
Issue 1:	Create a significant hazard to the public or the environment through routine transport, use, or disposal of hazardous materials?	☐	☐	☐	☒	☐

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

The project, as a R&D facility, includes laboratory uses that could involve the use of acutely hazardous materials. However, chemicals would be located in separate containers and incompatible chemicals would be separated as specified by the International Fire Code. Materials that could involve the emission of vapors would be performed under fume hoods that would function to capture emissions at the source, dilute the emissions in the hood, and then expel the emissions

where they can disperse in the atmosphere. Waste streams, if determined to be hazardous, would be organized to be disposed of as a hazardous material at a state-permitted treatment or disposal facility. The delivery and disposal of chemicals to and from the project site would occur in full accordance with all applicable federal, state, and local regulations. Therefore, the project would not create a significant hazard to the public or the environment through routine transport, use, or disposal of hazardous materials. Impacts would be less than significant.

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

As discussed above, Section 6.7, Issue 1, limited quantities of hazardous materials such as gasoline, diesel, oils, and lubricants may be required to operate the construction equipment. Construction activities would be short-term, and the use of these materials would cease once construction is complete. The hazardous substances used during construction would be required to comply with existing federal, state, and local regulations regarding the use and disposal of these materials. In the event of an accidental release during construction containment and clean up would be in accordance with existing applicable regulatory requirements.

Project operation may include the transport and use of hazardous materials onsite. However, the project would adhere to all applicable federal, state, and local regulations related to the use of hazardous materials. In the event of an accidental release during operation containment and clean up would be in accordance with existing applicable regulatory requirements. Therefore, the project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Impacts would be less than significant.

Issue		Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
Issue 3:	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☐	☒

The proposed project is not located within one-quarter mile of an existing or proposed school. The nearest school is the Torrey Hills School, which is an elementary school located approximately

one mile northeast of the project site. Therefore, the project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. No impact would occur.

Issue		Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
Issue 4:	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?	☐	☐	☐	☐	☒

A database search was conducted for the project site using the Department of Toxic Substances Control's (DTSC's) EnviroStor database and the State Water Resources Control Board's (SWRCB's) GeoTracker database (DTSC 2024; SWRCB 2024). No active sites were identified within 1,000 feet of the project site on either database. One Tiered Permit cleanup site (71002885) is located within 1,000 feet of the project site, but it has remained inactive since 2001, and the status is no action required. Therefore, the project would not create a significant hazard to the public or environment resulting from being included on a list of hazardous materials sites. No impact would occur.

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

Refer to Section 6.1, Issue 3 above. The proposed project is located approximately five miles northwest of the MCAS Miramar Airport. According to the ALUCP for MCAS Miramar, the project site is located within an AICUZ Safety Zone, specifically APZ II, for MCAS Miramar (San Diego County Regional Airport Authority 2011). Project implementation would not conflict with the APZ II designation. While the project would exceed the FAR allowed within the APZ II designation, the project would not exceed the allowed people per acre or parking intensity standards set by the City and would therefore be consistent with the APZ II designation. As such, the project would not result in land uses that are incompatible with an adopted ALUCP. Impacts would be less than significant.

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

Access to the project site is proposed via the existing access driveway off Torreyana Road. No off-site improvements are proposed, and all construction activities would occur within the site. A total of 140 employees and 50 trucks are expected each day during construction, resulting in 480 ADT (Appendix B). Construction traffic would not impair implementation of or physically interfere with the City's emergency response plan or evacuation routes. As a result, the project's construction-related impacts on emergency response or evacuation would be less than significant.

The project's trip generation is based on the project's total entitled building area of 122,980 SF. As discussed in the VMT Assessment prepared for the project (Appendix B), the project would generate 984 ADT, with 157 AM (141 in, 16 out) peak hour trips and 138 PM (14 in, 124 out) peak hour trips. The project does not propose changes to the City's existing circulation network and no land uses are proposed that would impair implementation of or physically interfere with the City's emergency response plan or evacuation routes. The project is consistent with the underlying land use and zoning that was considered in emergency evacuation planning efforts. Thus, the proposed project would not result in interference with emergency response access or evacuation. The impacts related to the operation of the project would be less than significant.

6.8 Historical/Archaeological/Tribal Cultural Resources

Would the project:

Issue		Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
Issue 1:	Result in an alteration, including the adverse physical or aesthetic effects and/or destruction of a historic building (including architecturally significant building) structure, object, or site?	☐	☐	☐	☐	☒

The project site is located on the City's Historical Resources Sensitivity Map, which was most recently updated as Figure 4.4-3 of the University Community Plan Update Final EIR (City 2024d). A California Historic Resources Information System (CHRIS) search was conducted to determine the presence or absence of potential resources within the project site. According to the CHRIS search, no sites are mapped within the project site (City 2024e). Proposed grading would be limited to the existing

development footprint and grading would not extend into areas with potential for archaeological resources. The existing buildings on the project site do not constitute a significant historic resource and development of the project would not result in the destruction of a historic building. No impact would occur.

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

As stated above, the CHRIS search conducted for the project site was negative, and the project would not result in an adverse change in the significance of a historical resource. As described in the project's Geotechnical Investigation (Appendix D), the project site is underlain by undocumented fill, Scripps Formation, and Ardath Shale. The undocumented fill was placed during the previous grading of the project site, at which point any potential cultural resources on the project site would have been removed. Scripps Formation and Ardath Shale, which underly the undocumented fill, are approximately 50 million years old and do not have the potential to contain archaeological resources or human remains. Due to the previously disturbed nature of the project site and the site's underlying conditions, the project would result in a less than significant impact to cultural resources.

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

Issue	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
Issue 3: Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:					
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k); or,	☐	☐	☐	☒	☐

As detailed in Section 6.8, Issues 1 and 2 above, the CHRIS search conducted for the project site was negative, and due to the disturbed nature of the project site and the site's underlying geology, the project site is not anticipated to contain any tribal cultural resources. AB 52 consultation process was also completed by the City, and no tribal cultural resources were identified during that process (see Section 3.3 above). The existing buildings on the project site are not eligible for listing in the California Register of Historical Resources or in any other local register of historical resources, and impacts would be less than significant.

Issue	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☐	☐	☒	☐

Refer to Section 6.8, Issue 3a above. The project's CHRIS search, development history, and geological setting make the presence of tribal cultural resources unlikely. The project would not result in a substantial adverse change in the significance of a tribal cultural resource, and impacts would be less than significant.

6.9 Hydrology/Water Quality

Would the project:

Issue		Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
Issue 1:	Result in flooding due to an increase in impervious surfaces or changes in absorption rates, drainage patterns, or the rate of surface runoff?	☐	☐	☐	☒	☐

The discussion below is based on the Hydrology and Drainage Study and the Priority Development Project (PDP) SWQMP prepared by Snipes-Dye Associates in August 2024 (Appendices F and E, respectively).

The project would occur within the footprint of the existing developed portion of the site. As discussed in the Hydrology and Drainage Study prepared for the project, the drainage characteristics would remain similar to existing conditions (Appendix F). The existing storm drain system involves eight basins that confluence at a single point in an existing storm drain cleanout on the adjacent property to the north, which then flows downhill towards Los Peñasquitos Lagoon. The existing peak discharge rate for the 100-year storm event is 13.07 cubic feet per second (cfs).

The post-development conditions associated with the project involve five basins, four of which contain a Modular Wetlands System and an underground detention basin for hydromodification (Appendix E). All five basins would connect to a main storm drain system in the project driveway, which would then direct storm flows to the existing storm drain system on the site that runs down the northerly slope towards Los Peñasquitos Lagoon. The total peak discharge in the post-development condition would be 12.45 cfs, a decrease of 0.62 cfs from the pre-development condition. The project would not substantially change the drainage pattern of the site, nor would it result in an increase in peak flows over existing conditions.

Therefore, the project would not result in flooding or substantially increase impervious surfaces, absorption rates, or the rate of surface runoff. Impacts would be less than significant.

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

The discussion below is based on the Hydrology and Drainage Study and the SWQMP prepared by Snipes-Dye Associates in August 2024 (Appendices F and E, respectively).

As described in the project's SWQMP (Appendix E), project runoff ultimately discharges into the Los Peñasquitos Lagoon, which is a Clean Water Act Section 303(d) listed impaired water body. The Los Peñasquitos Lagoon is primarily impaired with sedimentation and siltation which result in significant alterations to habitat. Other impairments include freshwater inundation and bacteria.

There are no Critical Coarse Sediment Yield Areas on the existing project footprint nor upstream of the area draining through the project (Appendix E). As a result, the project is not anticipated to result in increased sedimentation in the Los Peñasquitos Lagoon. Regardless, the project would include features to capture sediment on site. The project would contain five basins, four of which would contain a Modular Wetlands System and an underground detention basin, to catch and store project runoff. The Modular Wetlands Systems would remove sediment from project runoff before the runoff enters the biofiltration chamber to be treated and released. As a result, the project would not result in an increase in sediment discharge to the Los Peñasquitos Lagoon.

The five basins described above would catch and slow freshwater runoff on the project site. As described in Issue 1 above, the total peak discharge in the post-development condition would be 12.45 cfs, a decrease of 0.62 cfs from the pre-development condition (Appendix F). The project would not result in increased freshwater inundation to the Los Peñasquitos Lagoon.

The project's Modular Wetlands Systems are designed to capture and treat project runoff through biofiltration. Modular Wetlands Systems effectively remove total suspended solids, heavy metals, nutrients, hydrocarbons, and bacteria from runoff through a combination of physical, chemical, and biological filtration processes (Appendix E). Project runoff would flow into the four Modular Wetlands Systems on the project site for treatment before being released, and no increase in bacteria or other pollutant discharge to the Los Peñasquitos Lagoon would occur.

The project would not result in significant runoff or pollutant introduction through the incorporation of Modular Wetlands Systems and underground detention systems, which would slow and treat project runoff.

A Storm Water Pollution Prevention Plan (SWPPP) would be prepared in compliance with the Construction General Permit, which would identify sediment and pollutant control BMPs that would be implemented to minimize water quality impacts during construction. Common BMPs include silt fences, fiber rolls, and dust control, but final measures would be determined during the preparation of the SWPPP.

Therefore, the project would not result in a substantial increase in pollutant discharge to receiving waters or increase of identified pollutants to an already impaired water body. Impacts would be less than significant.

Issue		Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
Issue 3:	Deplete groundwater supplies, degrade groundwater quality, or interfere with groundwater recharge?	☐	☐	☐	☒	☐

According to the San Diego Basin Plan, groundwater recharge is not a beneficial use for the Los Peñasquitos Creek Watershed (California Water Boards 2021). Additionally, the project is not located in a priority groundwater basin area (San Diego County Water Authority 2025). There is no groundwater extraction occurring or planned at the project site; therefore, there would be no disruption to any existing groundwater levels or well production. In relation to impervious surfaces that could interfere with groundwater recharge, the project would occur within the footprint of the existing developed portion of the site. The project would ultimately reduce the site's impervious surface area by approximately 1,070 SF, from 126,560 SF under existing conditions to 125,490 SF with the project. Additionally, as discussed in the Hydrology and Drainage Study prepared for the project, the project would incorporate Modular Wetlands Systems and underground detention systems to attenuate the 100-year 6-hour storm event peak flow below pre-project conditions which would provide for percolation into the groundwater (Appendix F). Captured runoff from catch basins on site would discharge into the underground detention system and then be treated in the adjacent Modular Wetlands Systems prior to entering into the groundwater basin. Therefore, the project would not result in flows that may interfere with groundwater quality. Impacts related to groundwater would be less than significant.

6.10 Noise

Would the project:

Issue		Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
Issue 1:	Result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☐	☒	☐

The City's Thresholds identify that a significant impact would occur if:

- Operational generated noise would result in an increase of three decibels and exterior noise levels that exceed the noise compatibility standards in General Plan Table NE-3. Residential uses must also not be exposed to noise levels resulting in interior noise levels exceeding 45 dBA CNEL.

- The project would generate operational noise levels at the property line exceeding the City's Noise Ordinance Standards.

- Temporary construction noise would exceed an hourly noise level (denoted as L_{EQ}) of 75 dBA L_{EQ} at a sensitive receptor. In addition, construction activity must comply with the hours and days when construction is allowed according to SDMC Section 59.5.0404, unless a permit states otherwise.

- Construction noise would interfere with normal business communications or affect sensitive receptors such as daycare facilities.

- Noise levels during the breeding season for the coastal California gnatcatcher, least Bell's vireo, southern willow flycatcher, least tern, cactus wren, tricolored blackbird or western snowy plover would exceed 60 dBA or existing ambient noise level if above 60 dBA.

<u>Construction Equipment Noise</u>

The nearest noise-sensitive land use to the project site is the hotel approximately 2,100 feet to the west. At this distance, it is not anticipated that construction would result in noise levels exceeding ambient conditions. For example, a grader, which is typically the loudest piece of equipment associated with grading activities, is anticipated to generate an hourly noise level of 48.6 dBA L_{EQ} at 2,100 feet. Other construction activity is anticipated to be less intensive and result in lower noise levels than grading. In addition, construction would occur during the hours and days allowed by the SDMC, reducing the disturbance associated with construction. Therefore, project construction is not anticipated to exceed the construction noise limit of 75 dBA L_{EQ} at a noise sensitive land use and impacts would be less than significant.

The project is located adjacent to an R&D building to the south. As described above, a grader is typically the loudest piece of equipment associated with construction activities. Grading activities would take place throughout the project site, at an average distance of 150 feet from the neighboring structure. A grader would generate an hourly noise level of 71.5 dBA L_{EQ} at 150 feet, which is less than the construction noise limit of 75 dBA L_{EQ} at noise sensitive land uses. Additionally, the neighboring R&D structure would attenuate construction noise at indoor receptors. As a result, the proposed construction would not affect regular business communications within the adjacent building to the south.

As required by permit conditions, if occupied habitat is detected or presumed to occur adjacent to the project site during the breeding season, construction noise levels would be required to be reduced in accordance with MHPA regulations. Temporary increases in ambient noise levels from construction activity would not conflict with the applicable regulations and impacts would be less than significant.

Construction Traffic Noise

Construction would generate vehicular traffic in the form of worker vehicles and soil export trucks. Vehicles associated with project construction would utilize North Torrey Pines Road to access the site, which carried approximately 16,100 ADT in 2016 (per City of San Diego traffic counts records). As a general rule, the doubling of noise source would cause a perceptible increase in noise for the average human receptor. The addition of construction worker commute trips and hauling trips throughout the construction period would not result in a doubling of existing traffic volumes or noise sources along North Torrey Pines Road. Therefore, noise impacts resulting from temporary increases in construction traffic would be less than significant.

Operational Noise

The City Noise Ordinance (SDMC Section 59.5.0401) sets limits for noise generation, as measured at the property line. For the project's light industrial land use and surrounding light industrial land uses, the applicable noise standard would be 75 dBA L_{EQ}.

Operational noise associated with the project would primarily be generated by employees traveling to and from the project site. As discussed above, traffic volumes would generally need to double for a perceptible increase in traffic noise to occur. The project would generate 984 ADT, which would not double traffic along North Torrey Pines Road, which carried approximately 16,100 trips in 2016 per City of San Diego traffic count records. The project would replace an existing R&D use with development of a similar type and scale, and a substantial change in traffic volumes would not occur on the project site. Therefore, the project would not cause an increase in traffic noise that would expose off site uses to substantial increases in traffic noise and impacts related to operational traffic noise would be less than significant. Maintenance activities may require the use of landscaping equipment and minor tools, but the associated noise would be occasional and would not result in a significant noise impact.

Operation of the project would include stationary sources of noise such as heating, ventilation, and air conditioning (HVAC) systems and on-site generators. Project HVAC units would be installed in underground mechanical rooms at a central utility plant approximately 200 feet north of the southern property line and cooling towers would be installed within an enclosed mechanical yard approximately 100 feet south of the northeastern property line. Given this distance and the installation of HVAC equipment within enclosed spaces, HVAC noise would not conflict with the 75 dBA L_{EQ} property line limit established for industrial land uses by the City's Noise Abatement and Control Ordinance.

Project generators would be placed on the eastern side of the property approximately 100 feet from the adjusted MHPA boundary. It is assumed that habitat within the MHPA east of the site would be occupied at times during project operation; therefore, project-generated noise levels at coastal California gnatcatcher habitat in the MHPA would be considered significant if they would exceed the assumed 60 dBA L_{EQ} ambient noise level. The project proposes sound enclosures and concrete masonry unit walls around project generators to reduce operational noise. The project would be conditioned to comply with the MHPA Land Use Adjacency Guidelines, including measures protecting nesting gnatcatchers from noise. The project would also be specifically conditioned to ensure that generator noise would not exceed 60 dBA L_{EQ} at the MHPA boundary during operation in accordance with the MHPA Land Use Adjacency Guidelines, as follows:

Prior to the issuance of the first building permit, the Permittee shall demonstrate the proposed generators shall comply with the Land Use Adjacency Guidelines noise limit of 60 A-weighted decibels (dBA) equivalent continuous sound level (L_{EQ}) at the Multiple Habitat Planning Area (MHPA) boundary. Sound levels shall be quantified by a qualified acoustical professional. The acoustical professional shall provide a letter to the satisfaction of the Environmental Designee and MSCP that demonstrates the noise levels would not exceed 60 dBA at the nearest MHPA boundary. All required features to obtain the 60 dBA noise level shall be identified on the building plans prior to building permit issuance.

Adherence to the MHPA noise limit would also ensure compliance with the property line noise limit for industrial land uses of 75 dBA L_{EQ}.

With adherence to the MHPA Land Use Adjacency Guidelines, noise impacts would be less than significant.

Issue		Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
Issue 2:	Cause the generation of, excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐	☐

Excessive ground-borne vibration would occur if construction-related ground-borne vibration exceeds the “severe” vibration annoyance potential criteria for human receptors of 0.4 inch per second peak particle velocity (PPV) or the damage potential criteria criterion to modern commercial buildings of 0.5 inch per second PPV for continuous/frequent intermittent construction sources (such as impact pile drivers, vibratory pile drivers, and vibratory compaction equipment) at adjacent buildings, as specified by the California Department of Transportation ([Caltrans] 2020). In addition, given the surrounding research land uses that may contain vibration-sensitive equipment, the Federal Transit Administration (FTA) criterion of 65 VdB is considered in this analysis (FTA 2018).

The piece of construction equipment with the greatest vibration potential that would be needed for project construction activities is a vibratory roller, which is used for compaction of soil beneath building foundations and could be used within 25 feet of the nearest off-site building to the south. No rock blasting or piledriving, which generate higher levels of vibration, is proposed. A vibratory roller creates approximately 0.210 inch per second PPV and 94 VdB at a distance of 25 feet (Caltrans 2020). At the nearest off-site building, the vibration level of 0.210 inch per second PPV would be lower than the structural damage impact to commercial structures criterion of 0.5 inch per second PPV and the “severe” impact criterion for humans of 0.4 inch per second PPV. However, buildings in the project vicinity are R&D uses that could contain vibration-sensitive equipment such as microscopes or lithographic equipment. A vibratory roller must be operated at least 232 feet away from a structure to keep vibration levels below 65 VdB, but the project proposes construction activity within 232 feet of the R&D building to the south. As a result, the FTA criteria for vibration-sensitive equipment of 65 VdB would be exceeded. Mitigation measure MM-NOI-1 would be required to prevent interference with vibration-sensitive equipment. Under mitigation measure MM-NOI-1, the project applicant would be required to coordinate with nearby building owners and/or

operate vibratory construction equipment at specified distances from nearby buildings to reduce vibration impacts to a less than significant level. With the implementation of mitigation measure MM-NOI-1, impacts related to groundborne vibration would be less than significant.

Issue		Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
Issue 3:	Be located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒	☐

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

6.11 Paleontological Resources

Would the project:

Issue		Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
Issue 1:	Result in development that requires over 1,000 cubic yards of excavation in a high resources potential geologic deposit/formation/rock unit or over 2,000 cubic yards of excavation in a high resources potential geologic deposit/formation/rock unit.	☐	☐	☐	☒	☐

According to the Geotechnical Investigation prepared for the project, the project site is underlain with undocumented fill, the Scripps Formation, and Ardath Shale (Appendix D). The potential for paleontological resources in undocumented fill is extremely low. The Scripps Formation is considered to be potentially fossiliferous in most locations. Most of the fossils known from this formation consist of remains of marine organisms (i.e., bony fishes, sharks, rays, etc.) and land mammals (i.e., uintathere, brontothere, rhinoceros, and artiodactyl). Therefore, the Scripps Formation is recognized as having a high paleontological resource sensitivity. The Ardath Shale has yielded diverse and well-preserved assemblages of marine microfossils, macroinvertebrates, and

vertebrates. As such, the Ardath Shale is also recognized as having a high paleontological resource sensitivity.

The project is anticipated to involve 60,000 cubic yards of cut and 1,000 cubic yards of fill during excavation. In accordance with SDMC Section 142.0151 (Paleontological Resources Requirements for Grading Activities), the project would require paleontological monitoring during grading and/or excavation activities as outlined in the City's Land Development Manual Appendix P, General Grading Guidelines for Paleontological Resources (City 2004). Adherence to Section 142.0151 of the SDMC would reduce impacts to a less than significant level.

6.12 Public Services and Facilities

Would the project:

Issue	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
Issue 1: Promote growth patterns resulting in the need for and/or provision of new or physically altered public facilities (including police, fire-rescue, schools, libraries, parks, or other recreational facilities), the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?	☐	☐	☐	☒	☐

The City of San Diego Police Department provides police services for the project site, and the City of San Diego Fire-Rescue Department provides fire-rescue services for the project site. The project would replace the R&D uses with new R&D uses and supporting amenities that are consistent with the site's zoning of IP-1-1 and land use designations of Industrial Employment/Scientific Research. As the use of the project site would remain similar and the net increase would be less than the 75,000 square feet identified in the City's Significance Determination Thresholds (2022), a substantial increase in the number of calls for fire or police services is not anticipated and project implementation would not require the construction of new or expanded fire and police facilities. In addition, the project would not result in population generation, thereby resulting in additional demand for fire protection, police protection, schools, parks, or other public facilities. Impacts would be less than significant.

Issue		Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
Issue 2:	Increase the use of existing neighborhood and regional recreational facilities such that substantial deterioration of the facility would occur or be accelerated?	☐	☐	☐	☐	☒

The proposed project involves the replacement of R&D uses with new R&D uses and supporting amenities. The project would not introduce inhabitants or visitors that would use existing recreational facilities or create the need for new facilities. The proposed project would not result in the physical deterioration of an existing open space area or any recreation facilities. Therefore, no impact would occur.

Issue		Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
Issue 3:	Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☐	☒

The proposed project does not involve or require the construction or expansion of recreational facilities. See above Section 6.12 Issue 2 response. Therefore, no impact would occur.

6.13 Public Utilities and Infrastructure

Would the project:

Issue		Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
Issue 1:	Use excessive amounts of water beyond projected available supplies?	☐	☐	☐	☒	☐

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

between total water demands and local supplies. Implementation of the project would not result in new or expanded water entitlements from the water service provider. The project would be consistent with the existing land use and zoning designations for the project site, and therefore, would be consistent with existing water demand projections contained in the UWMP. The net change in R&D space would not trigger the need for a water supply assessment per Senate Bill 610. Therefore, the project would not use excessive amounts of water beyond projected available supplies, and impacts would be less than significant.

Issue		Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
Issue 2:	Promote growth patterns resulting in the need for and/or provision of new or physically altered utilities, the construction of which could cause significant environmental impacts in order to maintain service ratios, or other performance objectives?	☐	☐	☐	☒	☐

The project involves the replacement of the existing R&D uses with new R&D uses, consistent with the project's land use designations of Industrial Employment/Scientific Research and zoning of IP-1-1. The project site is currently served by existing underground water, stormwater, and sewer lines located within the adjacent streets. Infrastructure improvements would be limited to connections with these underground utility lines located within the adjacent streets. Additionally, utility improvements would occur at the project site as part of the project, the impacts of which are considered herein. Impacts would be less than significant.

As discussed under Section 6.13, Issue 3 below, the project would generate waste during pre-construction, construction, and operation. However, the project would not generate excessive amounts of waste that would require the need for new or physically altered waste disposal facilities. The project would also provide at least 720-square feet of trash and recycling storage space, per the City Storage Ordinance. Furthermore, the project would be required to comply with the SDMC (including the Refuse, Organic Waste, and Recyclable Materials Storage Regulations (SDMC Chapter 14, Article 2, Division 8; City 2024f), Recycling Ordinance (SDMC Chapter 6, Article 6, Division 7; City 2022c), and the C&D Debris Deposit Ordinance (SDMC Chapter 6, Article 6, Division 6; City 2016)) for diversion of both construction waste during the demolition phase and solid waste during the long-term, operational phase.

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

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

The discussion below is based upon the Waste Management Plan (WMP) prepared by Snipes-Dye Associates for the proposed project dated August 2025 (Appendix G). The project would be conditioned to comply with the WMP.

During pre-construction demolition, clearing/grubbing, and grading, the project would produce approximately 9,010 tons of excavated soils, green waste, asphalt/concrete, and other C&D waste, and divert approximately 7,622 tons of these materials from the landfill. Approximately 1,388 tons of solid waste material generated during pre-construction is anticipated to be disposed of as non-recyclable/non-reusable waste at EDCO Recovery and Transfer, for an overall pre-construction diversion rate of 84.6%.

During construction, the project would produce approximately 267 tons of solid waste (metal, concrete, concrete/steel, asphalt, brick/masonry, wood, drywall, carpet/carpet padding, mixed debris, and trash), and divert approximately 232 tons of solid waste materials from the landfill. The diverted material would consist of clean, source-separated (segregated) recyclable and/or reusable material, as well as mixed debris, to be deposited at the recycling/reuse facilities identified in the City's Certified C&D Recycling Facility Directory (City 2024g). Approximately 35 tons of solid waste material generated during construction is anticipated to be disposed of as non-recyclable/non-reusable waste at the Otay C&D/Inert Debris Processing Facility, for an overall diversion rate during construction of approximately 87%.

With the combined pre-construction and construction phases, the project would produce 9,277 tons of solid waste and would divert 7,854 tons. This would be an overall diversion rate during pre-construction and construction of 85%. Therefore, the project would exceed the C&D diversion threshold of 75% in Assembly Bill (AB) 341.

During occupancy, it has been estimated that the project would generate an additional 70 tons of waste per year over existing conditions. Using an estimated 50-percent diversion rate, which is based on compliance with SB 1383, an additional approximately 35 tons per year are calculated to be diverted to recycling/reuse facilities (in comparison to existing conditions). An additional estimated 35 tons per year, or 50% of occupancy material generated, are projected to be disposed of as non-recyclable/non-reusable waste (in comparison to existing conditions). The project would

also be required to comply with organic waste diversion requirements pursuant to SB 1383, which mandates diversion of a minimum of 75% of organic waste generated on site as of 2025. To assist in achieving this goal, project tenants, operators, and/or future owners shall subscribe to a City-certified organic waste collection service that either "source-separates" the waste (e.g., separate bins), or transports all unsegregated waste to a facility that recovers 75% of the organic content collected from the system.

Additionally, organic waste generated by the project's routine landscaping would be diverted from the landfill. Thus, the project is expected to achieve a waste diversion rate of greater than 50% overall. Additional waste reduction, recycling, and diversion measures, specified in the WMP, would further reduce the project's operational waste disposal. Regarding trash and recycling storage space during operation, for the proposed buildings, the project would provide at least 720-square feet of trash and recycling storage space, per the City Storage Ordinance. The project would comply with the City Recycling Ordinance by providing adequate space, bins, and educational materials for recycling during occupancy. Additionally, the project would provide adequate organic waste disposal space per the requirements of SDMC Section 142.0801. Therefore, the project's impacts related to solid waste would be less than significant.

6.14 Transportation

Would the project:

Issue		Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
Issue 1:	Conflict with an adopted program, plan, ordinance, or policy addressing the transportation system, including transit, roadways, bicycle, and pedestrian facilities?	☐	☐	☐	☒	☐

The project is opting in to the Complete Communities: Mobility Choices Ordinance. The transportation analysis provided herein is tiered from the Complete Communities: Housing Solutions and Mobility Choices Program PEIR (SCH. No. 2019060003) and associated Findings and SOCs (City 2020) as identified in CEQA Guidelines Section 15152. As such, the assessment below addresses if the significant effects of the project were adequately addressed in the prior PEIR. A project-specific VMT Assessment dated March 2024 (Appendix B) was prepared to support this analysis in accordance with the Mobility Choices Program requirements.

The Complete Communities: Housing Solutions and Mobility Choices Program is incorporated by reference and available online at https://www.sandiego.gov/sites/default/files/final_peir_for_complete_communities_housing_solutions_and_mobility_choices.pdf and the Findings and SOCs are incorporated by reference and available online at https://www.sandiego.gov/sites/default/files/r-313279.pdf

Complete Communities PEIR

The Complete Communities PEIR found that the Complete Communities project would not conflict with adopted transportation policies, plans, and programs, including those supporting transit, bicycle, and pedestrian facilities. The project incentivized the development of high-density multi-family residential development near existing transit areas. The Complete Communities project would support the goals of the City's General Plan, CAP, and SANDAG's 2021 Regional Plan, because it supports high densities within proximity to transit. Impacts would be less than significant.

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

Project

The project involves the replacement of existing R&D uses with new R&D uses that would be consistent with the land use designations of Industrial Employment/Scientific Research and zoning of IP-1-1. The project is anticipated to generate 984 weekday ADT with 157 AM (141 in, 16 out) peak hour trips and 138 PM (14 in, 124 out) peak hour trips. This increase would not conflict with applicable transportation regulations or plans or inhibit implementation of the regional transportation improvements required under SANDAG's 2021 Regional Plan (SANDAG 2021). As discussed further in Issue 2 below, the project would comply with the City's Complete Communities: Mobility Choices program by providing short- and long-term bicycle parking beyond the minimum requirements. The project is approximately 700 feet from the nearest bus stop and employees would have access to public transit. Sidewalks along the project frontage would allow pedestrian access to the project site. Therefore, the project would not conflict with an adopted program, plan, ordinance, or policy addressing the transportation system. Impacts would be less than significant and consistent with the findings in the Complete Communities PEIR.

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

Complete Communities PEIR

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

Although the Mobility Choices Program was anticipated to result in the implementation of infrastructure improvements that could result in VMT per capita and VMT per employee reductions, at a program level, potentially significant VMT impacts could nonetheless remain significant because it could not be determined with certainty whether the improvements would be implemented at the time a future development project's VMT impacts could occur and whether those impacts would be mitigated to a less than significant level. VMT impacts associated with development under the Housing Solutions and Mobility Choices Program located in less efficient VMT areas would be significant and unavoidable for both VMT per capita and VMT per employee.

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

Project

The VMT Assessment prepared for the project was prepared in accordance with the City of San Diego Transportation Study Manual (TSM; City 2022d), which is consistent with Office of Planning and Research (OPR's) recommendations and evaluates potential VMT transportation impacts. The City of San Diego TSM includes screening criteria, significance thresholds, analysis methodology, and mitigation.

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

The proposed commercial employment project is located within Census tract 83.39 with 25.1 VMT/employee (Series 14 ABM2+ Base Year 2016) which is 132.8 % of the regional mean of 18.9

VMT/employee. Therefore, the project is not screened out from a full VMT analysis per the City's screening criteria, and due to the location of the project in a VMT-inefficient area, the project may result in a significant VMT impact.

Since the project did not satisfy the above screening criterion, it must evaluate the VMT produced by the project. For Commercial Employment projects that are expected to generate less than 2,400 daily trips, the project's VMT per employee is considered the same as the VMT per employee of the census tract in which it is located.

As stated above, the project is in a census tract with 25.1 VMT per employee, or 132.8% of the regional mean. The proposed project would have a significant VMT impact based on the significance threshold for a commercial employment project of 15% below the regional mean VMT per Employee. Therefore, additional measures are required per SDMC to reduce the project's VMT impact to the extent feasible.

The SDMC Ordinance Number O-21274 provides the development regulations for the Mobility Choices portion of the Complete Communities Program. According to the ordinance, the project is within Mobility Zone 2, which means it is located either partially or entirely within a TPA. The SDMC Section 143.1103(b) states that all development within Mobility Zone 2 is required to provide VMT Reduction Measures in accordance with the Land Development Manual Appendix T. The Land Development Manual Appendix T provides a list of VMT Reduction Measures, each of which is assigned a point value per unit of measure. Per SDMC Section 143.1103(b)(6), developments in Mobility Zone 2 that provide more than the minimum required parking are required to provide VMT Reduction Measures totaling at least 8 points.

Implementation of mitigation measure MM-TRA-1 that includes VMT Reduction Measures in accordance with the SDMC would reduce VMT impacts to the extent feasible and ensure project consistency with the Complete Communities: Mobility Choices Ordinance. Under MM-TRA-1, the project would provide VMT Reduction Measures as required by the ordinance that add up to at least 8 points as identified in the Land Development Manual Appendix T, through the measures provided in Table 4, *VMT Reduction Measures for Mobility Choices Compliance*, below.

Table 4
VMT REDUCTION MEASURES FOR MOBILITY CHOICES COMPLIANCE

Category	Measures	Points
Bicycle Supportive Measures	The project will provide an on-site bicycle repair station.	1.5
	The project will provide short-term bicycle parking spaces that are available to the public, 30% beyond minimum requirements (16 spaces required; 21 spaces proposed).	4.5[1]
	The project will provide long-term bicycle parking spaces at least 10% beyond minimum requirements (16 spaces required; 18 spaces proposed).	2[1]
	Total	**8**

[1] 1.5 points for each multiple of 10% beyond the minimum requirement.

The project's proposed VMT Reduction Measures identified in MM-TRA-1 total 8 points, and the project would comply with the Mobility Choices Program. The project would mitigate its significant VMT impact to the extent feasible by complying with the City's Complete Communities Mobility Choices Program in accordance with the Complete Communities: Housing Solutions and Mobility

Choices Final PEIR and associated Findings and SOCs. The project VMT impacts were adequately addressed in the Complete Communities: Housing Solutions and Mobility Choices Final PEIR, and the project CEQA analysis herein incorporates by reference the Complete Communities: Housing Solutions and Mobility Choices Final PEIR and associated Findings and SOCs (City 2020). Refer to those documents for additional information.

Issue		Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
Issue 3:	Substantially increase hazards due to geometric design features (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?	☐	☐	☐	☒	☐

Complete Communities PEIR

The Complete Communities PEIR (City 2020) found that although the project did not propose specific changes to roadways, future projects implemented in accordance with the Housing Program may include transportation improvements. Additionally, transportation improvements would result from the implementation of the Mobility Choices Program. Any proposed improvements to roadways or amenities, such as bicycle facilities, would undergo review and approval by the City Engineer. Adherence to the City standards, including the City's Street Design Manual, would ensure that a substantial increase in hazards or incompatible uses would not occur as part of the project. The project did not include any design features or improvements that would result in a substantial increase in hazards due to design features or incompatible uses. Impacts would be less than significant.

The Complete Communities PEIR (City 2020) found that cumulative impacts associated with increased hazards due to design features would be less than significant as the project would support transportation infrastructure and amenities intended to increase multi-modal accessibility and safety. Development associated with the Housing Solutions Program would occur in existing Mobility Zones 1, 2, and 3. Cumulative impacts associated with hazardous geometric design features or incompatible uses would be less than significant.

Project

There would be no hazardous design features or incompatible uses introduced as a result of the project. Construction would take place within the site of the existing R&D uses. The proposed R&D uses would be compatible with the site's land use designations of Industrial Employment/Scientific Research and zoning of IP-1-1. The project's paved internal roadways would not include sharp curves or intersections. The access driveway would be built to current City standards with appropriate widths, sight distance, spacing, permitted turn movements, and accommodation of delivery vehicles. The parking areas would provide adequate vehicle circulation and parking maneuvers consistent with City standards. Therefore, impacts would be less than significant.

Issue		Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
Issue 4:	Result in inadequate emergency access?	☐	☐	☐	☒	☐

Complete Communities PEIR

The Complete Communities PEIR (City 2020) determined that future development allowed under the proposed ordinances would be required to comply with all applicable City codes and policies related to emergency access including the California Fire Code, the 2022 California Fire Code (CFC) Appendix D Section D103, and City Fire Policies A-14-1 Fire Access Roadways (City 2015a), A-14-9 Access Roadways: Modified Roadway Surface (City 2015b), and A-14-10 Fire Apparatus Access Road for Existing Public Streets (City 2015c).

The Complete Communities PEIR (City 2020) found that cumulative impacts associated with emergency access would be less than significant, as the project would support transportation infrastructure and amenities intended to increase multi-modal accessibility and safety that would not conflict with emergency access. Development associated with the Housing Solutions Program would occur in existing Mobility Zones 1, 2, and 3. Cumulative impacts associated with emergency access would be less than significant.

Project

The project would not result in inadequate emergency access. The project would reconstruct the existing access driveway to 26 feet wide per current City Standards with appropriate sight distance, spacing, permitted turn movements, and accommodation of delivery vehicles and emergency vehicles. Therefore, the project would provide adequate emergency access. The impacts would be less than significant and consistent with the findings in the Complete Communities PEIR.

6.15 Wildfire

Would the project:

Issue		Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
Issue 1:	Expose people or structures, either directly or indirectly to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒	☐

Dudek prepared a Fire Fuel Load Monitoring report dated October 2023 for the project (Appendix H), which is incorporated into the following analysis.

According to the California Department of Forestry and Fire Protection's (CAL FIRE's) map of VHFHSZs prepared for the City, the project site and the majority of the surrounding area is located within a Local Responsibility Area VHFHSZ (CAL FIRE 2009). However, implementation of the project would not increase wildland fire risk at the site over existing conditions. The project would replace the existing R&D uses with new R&D uses that are consistent with the site's zoning of IP-1-1 and land use designations of Industrial Employment/Scientific Research. The project would install standard fire safety features and construct buildings in compliance with the fire regulations in the CBC and local requirements. Additionally, the project's Fire Fuel Load Monitoring Report describes brush management practices that would be implemented by the project, such as fire-resistant plants and annual brush maintenance, to reduce the risk of fire on the project site (Appendix H). Sitewide brush management would be implemented in phases alongside project construction to reduce the risk of fire during construction. Therefore, the project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires. Impacts would be less than significant.

Issue		Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
Issue 2:	Due to slope, prevailing winds, and other factors, exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒	☐

Dudek prepared a Fire Fuel Load Monitoring report dated October 2023 for the project (Appendix H) which is incorporated into the following analysis.

As discussed under Section 6.15, Issue 1 above, the VHFHSZ map prepared by CAL FIRE for the City of San Diego classifies the project site and the majority of the surrounding area is located within a VHFHSZ (CAL FIRE 2009). Areas are classified based on their terrain, weather, and other factors relevant to exacerbating wildfires. Although the project is located near the slopes of the open space to the east, implementation of the project would not increase wildland fire risk at the site over existing conditions. The project would replace the existing R&D uses with new R&D uses that are consistent with the site's zoning of IP-1-1 and land use designations of Industrial Employment/Scientific Research. The project would install standard fire safety features and construct buildings in compliance with the fire regulations in the CBC. Additionally, the project would conduct regular brush management to minimize fire risk to project buildings (Appendix H). Therefore, the project would not expose project occupants to pollutant concentrations from a wildfire of the uncontrolled spread of a wildfire due to slope, prevailing winds, and other factors. Impacts would be less than significant.

Issue		Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
Issue 3:	Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒	☐

Dudek prepared a Fire Fuel Load Monitoring report dated October 2023 for the project (Appendix H) which is incorporated into the following analysis.

The project has a zoning of IP-1-1 and land use designations of Industrial Employment/Scientific Research. The project would construct R&D uses similar to those in the area, and would not install infrastructure such as power lines, or other utilities that may exacerbate fire risk. If the project requires underground utility installation or connections, the utilities would be minimal and similar to the R&D uses in the surrounding area. Construction work would be both minimal and temporary and would incorporate brush management tactics such as vegetation clearing to reduce fire risk during construction (Appendix H). The project would not exacerbate fire risk or result in temporary or ongoing impacts to the environment. Impacts would be less than significant.

Issue		Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
Issue 4:	Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒	☐

The proposed project involves the replacement of R&D uses with new R&D uses and supporting amenities on a site with a zoning of IP-1-1 and land use designations of Industrial Employment/Scientific Research. As stated in Section 6.15, Issue 2 above, the proposed project would not exacerbate wildfire risks due to slope, prevailing winds, and other factors, and would not expose project occupants to significant levels of pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. The risk of people and structures experiencing significant risks such as downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes is negligible. As such, impacts would be less than significant.

6.16 Visual Effects and Neighborhood Character

Would the project:

Issue		Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
Issue 1:	Result in a substantial obstruction of a vista or scenic view from a public viewing area?	☐	☐	☐	☒	☐

A scenic vista is generally defined as a public viewpoint that provides expansive or notable views of a highly valued landscape and are typically identified in planning documents, such as a community plan, but can also include locally known areas or locations where high-quality public views are available. The University Community Plan does not explicitly list scenic vistas within the planning area but does recognize natural resources as visual resources (City 2024a). As such, the open space to the east of the project site can be considered scenic resources.

The project site is currently occupied by R&D land uses and does not include public viewing areas. As discussed in Section 3.1, the eastern portion of the project site contains a biological open space easement. However, the easement does not currently provide public access or provide public views. Implementation of the project would replace the existing buildings with R&D and supporting amenities, which would be of similar scale to the existing uses. The project would not block views or remove scenic vistas at the site because none are currently available. In addition, development would be limited to the existing developed footprint and would not encroach into the open space that provides scenic value. A covenant of easement would be placed over the remaining ESL on the site to ensure preservation. Impacts would be less than significant.

Issue		Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
Issue 2:	Result in a substantial adverse alteration (e.g., bulk, scale, materials, or style) to the existing or planned (adopted) character of the area?	☐	☐	☐	☒	☐

The project involves the replacement of an existing R&D development with new R&D buildings and supporting amenities. Therefore, the character of the site would be similar to existing conditions. Additionally, the project would be consistent with the site's zoning of IP-1-1 and land use designations of Industrial Employment/Scientific Research. The project would also have similar character to the nearby R&D land uses in the area. Therefore, the project would not result in a substantial adverse alteration to the existing or planned character of the area. Impacts would be less than significant.

Issue		Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
Issue 3:	Result in the loss of any distinctive or landmark tree(s), or stand of mature trees?	☐	☐	☐	☒	☐

Project implementation may result in the removal of onsite cultivated trees including 19 mature Torrey pine trees located within the open space easement which are currently serving as a buffer between the areas of development and open space on site; however, the project would not result in the loss of any distinctive or landmark trees or stand of mature trees. The project would protect 23 of the existing 73 trees in place and would plant 56 new trees, for a new total of 79 trees on the project site. As discussed in Section 6.3, Biological Resources, Torrey pine trees and Nuttall's scrub oak are the only distinctive trees located on the project site. Neither of these species are federally or state listed nor City narrow endemic plant species. The proposed project is primarily limited to existing developed and disturbed areas and impacts to native habitats with the potential to support these species would be minimal. Torrey pine within the project site consists of 29 cultivated trees that were planted as part of the previous development's mitigation; the project would remove 19 Torrey pine and replant 19 Torrey pine, resulting in no net decrease of Torrey pine on the project site. The project site contains four Nuttall's scrub oaks along the southern and southeastern edge of the existing developed area. The four Nuttall's scrub oaks have grown in a previously developed area, and their potential loss would not be considered a significant impact. Therefore, the project would not result in the loss of any distinctive or landmark trees or stand of mature trees. Impacts would be less than significant.

Issue		Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
Issue 4:	Result in a substantial change in the existing landform?	☐	☐	☐	☒	☐

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

Issue		Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
Issue 5:	Create substantial light or glare which would adversely affect daytime or nighttime views in the area?	☐	☐	☐	☒	☐

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

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

Construction activities would occur during permitted daylight hours between 7:00 a.m. and 7:00 p.m. Nighttime construction is not planned. The project would include lighting typical of industrial park and commercial land uses; such lighting would not create a new source of substantial light that would adversely affect daytime or nighttime views in the area. Sources of light would include interior light emanating from the buildings and exterior lighting for security, ambience, and signage. Largely, the project lighting would be similar to the existing land uses. Moreover, project lighting would be regulated by compliance with Section 142.0740 of the City of San Diego Land Development Code and the MHPA Land Use Adjacency Guidelines. Similar to the existing structures, the project would incorporate glass on the building exterior to serve as windows for the building. In accordance with Section 142.0730 of the Land Development Code, glass material having a light reflectivity greater than 30% would not be incorporated into the project's exterior. Those areas that would provide glass material would be tempered where required and would not result in the reflection of natural or artificial light off of the glass such that a bird strike or safety impact to motorists on surrounding roadways would occur. Impacts would be less than significant.

6.17 Agricultural and Forest Resources

Would the project:

Issue		Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
Issue 1:	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☐	☒

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

According to the DOC's California Important Farmland Finder (DOC 2022), the project site is classified as Urban and Built-Up Land; land characterized by a building density of at least 1 unit to 1.5 acres, or approximately 6 structures to a 10-acre parcel. Common examples include residential, industrial, commercial, institutional facilities, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, and water control structures. Agricultural land is not present on the site or in the general vicinity. As a result, the project would not result in the conversion of such lands to non-agricultural use. No impact would occur.

Issue		Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
Issue 2:	Conflict with existing zoning for agricultural use, or a Williamson Act Contract?	☐	☐	☐	☐	☒

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

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

Issue		Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
Issue 3:	Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 1220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	☐	☐	☐	☐	☒

Public Resources Code Section 12220(g) defines “forest land” as land that can support 10% native cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits. Based on this definition, no forest land occurs within or adjacent to the project site. Moreover, there is no land zoned as forest land or timberland that exists within the project site or within its vicinity. The project would not conflict with

existing zoning for or cause a rezoning of forest land, timberland, or timberland zoned Timberland Production. No impact would occur.

Issue		Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
Issue 4:	Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☐	☒

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

6.18 Mineral Resources

Would the project:

Issue		Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
Issue 1:	Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☐	☒

The DOC classifies the project site as within Mineral Resource Zone 1 (DOC 1997), which are areas where adequate information indicates that no significant mineral deposits are present or where it is judged that there is little likelihood for their presence to exist. The project site is not currently being utilized for mineral extraction, and the site is zoned and planned for R&D purposes with supporting amenities. The project would not result in the loss of availability of a known mineral resource. No impact would occur.

Issue		Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
Issue 2:	Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☐	☐	☒

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

6.19 Population and Housing

Would the project:

Issue		Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
Issue 1:	Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☒	☐

The proposed project does not include housing that would directly induce population growth. The project would provide employment opportunities through the development of up to 122,980 SF of R&D land uses and associated amenities and infrastructure. As discussed, the future tenants are unknown, so it is too speculative to provide an estimate on the number of new employment opportunities that would be introduced and if those opportunities would be at a magnitude to induce the relocation of employees to the area. It is possible that some of the project's future tenants would have a percentage of employees relocate to the area, but such numbers would not be substantial so as to adversely affect existing and future housing stock in the community. Thus, any incremental population growth as a result of project-related employment opportunities could be accommodated by the current and future housing stock. In addition, the proposed uses are consistent with the land use designation and zoning, and would not increase employment opportunities beyond that planned for. Therefore, impacts would be less than significant.

Issue		Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
Issue 2:	Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☐	☒

The project site is developed with the current R&D facility and surface parking, both of which would be demolished to accommodate the proposed project. Thus, the proposed project would not displace existing housing, necessitating the construction of replacement housing elsewhere. Moreover, the project site is not designated or zoned for residential land uses and therefore, project implementation would not remove land assigned for this purpose thereby indirectly resulting in the need for housing elsewhere. Therefore, no impact would occur.

6.20 Mandatory Findings of Significance

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

Issue	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
Issue 1: Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number, or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☐	☒	☐

As described in Section 6.3, the proposed development would be located in an existing developed area, and the project would not result in significant direct impacts to special-status species or sensitive natural communities. The project would be required to comply with federal, state, and City regulations to avoid potential indirect impacts to sensitive plants and animals. The project would be conditioned to comply with the MHPA Land Use Adjacency Guidelines to minimize indirect impacts to adjacent sensitive habitats and species. In accordance with the MHPA Land Use Adjacency Guidelines, the project would include a condition to limit noise generated at coastal California gnatcatcher habitat in the MHPA, as detailed in Section 6.3 above. The project therefore does not have the potential to result in impacts that would substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or substantially reduce the number or restrict the range of a rare or endangered plant or animal. Impacts would be less than significant.

The proposed development would be located in an existing developed area where no known historical, archaeological or tribal cultural resources exist. The project would not significantly impact cultural materials related to major periods of California history or prehistory, including tribal cultural resources. Refer to Section 6.8 above. Impacts would be less than significant.

Issue		Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
Issue 2:	Does the project have impacts that are individually limited but cumulatively considerable ("cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☒	☐	☐	☐

Cumulative impacts are defined as two or more individual project effects that, when considered together or in concert with other projects, combine to result in a significant impact (CEQA Guidelines Section 15355). There is potential for the construction schedules of other projects in the City to overlap. The construction of the proposed project would not impact biological resources, cultural resources, or tribal cultural resources, and therefore would not contribute to cumulative impacts regarding these topics. The project may result in impacts to paleontological resources that would be reduced to less than significant through standard paleontological monitoring required by SDMC Section 142.0151, which the surrounding projects in the City would also be subject to. Construction noise would be less than significant, and operational noise and construction vibration impacts would be reduced to a less than significant level through mitigation measure MM-NOI-1. Therefore, the project would not contribute to cumulative noise impacts. Additionally, all nearby projects would be required to comply with existing federal, state, and local regulations.

Cumulative impacts on biological resources in the City are addressed through project consistency with the City's MSCP Subarea Plan. The project was found to be consistent with the City's MSCP as well as local, state, and federal regulations, and therefore would not significantly contribute to any cumulatively significant biological impact. The cumulative impacts to biological resources would be less than significant.

The project would be consistent with the site's land use designations of Industrial Employment/Scientific Research and zoning of IP-1-1. Therefore, the project would be consistent with applicable planning documents, and its operation would not cause significant impacts that could contribute to cumulative land use impacts.

As discussed in Section 6.14 above, the project would not result in cumulative transportation impacts related to conflicting with a circulation plan, implementing hazardous design features or incompatible uses, or resulting in emergency access. While the project would result in a significant impact related to VMT that is inherently a cumulative issue, the project would be consistent with the findings in the Complete Communities PEIR (City 2020) and would implement VMT reduction measure MM-TRA-1 to reduce impacts to the extent feasible. Therefore, the project would not result in new cumulative impacts that have not previously been analyzed in the Complete Communities PEIR (City 2020).

Issue		Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
Issue 3:	Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐	☐

The proposed project would adhere to regulatory codes, ordinances, regulations, standards, and guidelines applicable to each of the environmental issue areas analyzed herein. As described above, the project would have a less than significant impact on air quality and greenhouse gas emissions and would not result in emissions that would significantly impact sensitive receptors. The project would not have the potential to cause adverse effects on human beings through the use, transport, or storage of hazardous materials through adherence to applicable regulations. Additionally, the project would mitigate vibration to such levels that would have substantial adverse effects on human beings. Impacts would be less than significant with mitigation.

7. APPENDICES

Appendix A CalEEMod Output (HELIX Environmental Planning, Inc. 2024)

Appendix B VMT Assessment (LLG 2024)

Appendix C Biological Resources Letter Report (Athena Consulting 2025)

Appendix D Geotechnical Investigation (Geocon 2022)

Appendix E SWQMP (Snipes-Dye Associates 2024)

Appendix F Hydrology and Drainage Study (Snipes-Dye Associates 2024)

Appendix G Waste Management Plan (Snipes-Dye Associates 2025)

Appendix H Fire Fuel Load Monitoring Report (Dudek 2023)

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Population and Housing

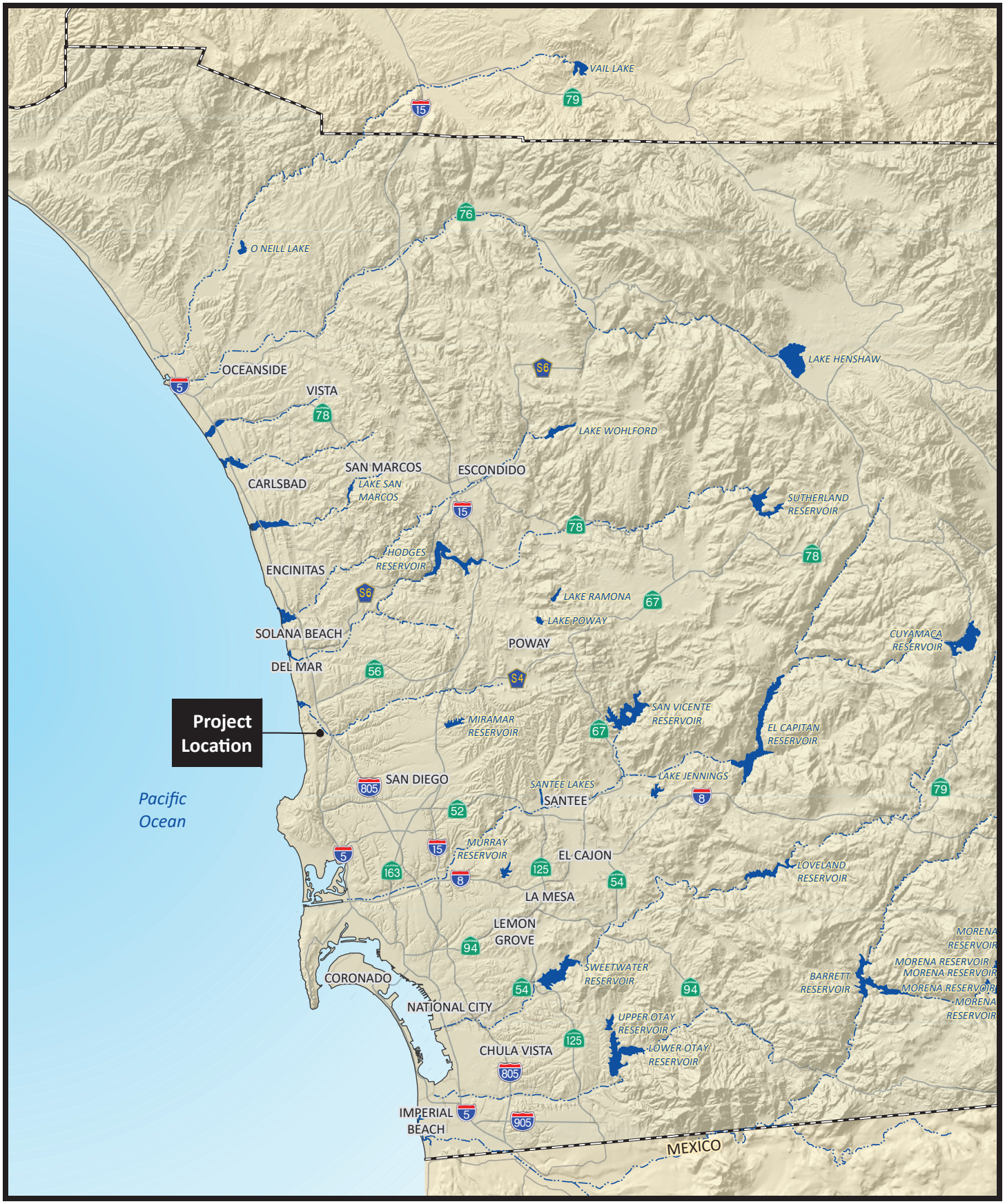
Not applicable.

9. LIST OF ACRONYMS AND ABBREVIATED TERMS

AB	Assembly Bill
ADD	Assistant Deputy Director
ADT	average daily trips
AICUZ	Air Installations Compatible Use Zone
ALUCP	Airport Land Use Compatibility Plan
APZ II	Accident Potential Zone II
BLC	Boundary Line Correction
BMP	best management practice
BRLR	Biological Resources Letter Report
C&D	construction and demolition
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
CalEEMod	California Emissions Estimator Model
CAL FIRE	California Department of Forestry and Fire Protection
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CARB	California Air Resources Board
CBC	California Building Code
CD	Construction Documents
CDP	Coastal Development Permit
CEQA	California Environmental Quality Act
cfs	cubic feet per second
CHRIS	California Historic Resources Information System
City	City of San Diego
CNEL	Community Noise Equivalent Level
CO	carbon monoxide
CRPR	California Rare Plant Rank
CY	cubic yards
dBA	A-weighted decibels
DPM	diesel particulate matter
DOC	California Department of Conservation

DSD	Development Services Department
DTSC	Department of Toxic Substances Control
ED	Environmental Designee
EIR	Environmental Impact Report
ESHA	environmentally sensitive habitat area
ESL	environmentally sensitive lands
EV	electric vehicle
FAR	Floor Area Ratio
FMMP	Farmland Mapping and Monitoring Program
FTA	Federal Transit Administration
GHG	greenhouse gas
I-	Interstate
IP-1-1	Industrial-Park
LCP	Local Coastal Program
L_{EQ}	equivalent continuous sound level
MCAS	Marine Corps Air Station
MHPA	Multiple Habitat Planning Area
MMC	mitigation monitoring coordination
MMRP	Mitigation Monitoring and Reporting Program
MND	Mitigated Negative Declaration
MSCP	Multiple Species Conservation Program
NAAQS	National Ambient Air Quality Standards
NDP	Neighborhood Development Permit
NO_2	nitrogen dioxide
NO_x	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
OPR	Office of Planning and Research
PDP	Priority Development Project
PEIR	Program Environmental Impact Report
PM_{10}	respirable particulate matter 10 microns or less in diameter
$PM_{2.5}$	fine particulate matter 2.5 microns or less in diameter
PPV	peak particle velocity
R&D	research and development
RAQS	Regional Air Quality Strategy
RE	Resident Engineer
SANDAG	San Diego Association of Governments
SB	Senate Bill
SDAB	San Diego Air Basin
SDAPCD	San Diego Air Pollution Control District
SDG&E	San Diego Gas & Electric
SDMC	San Diego Municipal Code
SF	square foot
SIP	state implementation plan
SO_2	sulfur dioxide
SOC	Statement of Overriding Considerations
SWPPP	Storm Water Pollution Prevention Plan
SWQMP	Storm Water Quality Management Plan

SWRCB	State Water Resources Control Board
TAC	toxic air contaminant
TPA	Transit Priority Area
TSM	Transportation Study Manual
USEPA	U.S. Environmental Protection Agency
UWMP	Urban Water Management Plan
VdB	vibration decibels
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	vehicle miles traveled
VOC	volatile organic compounds
WMP	Waste Management Plan



The City of SAN DIEGO

Regional Location

11085 Torreyana Road (Healthpeak Torreyana)/Project No. PRJ-1056938

Development Services Department

FIGURE No. 1

The City of SAN DIEGO

Aerial Photograph

11085 Torreyana Road (Healthpeak Torreyana)/Project No. PRJ-1056938

Development Services Department

FIGURE No. 2

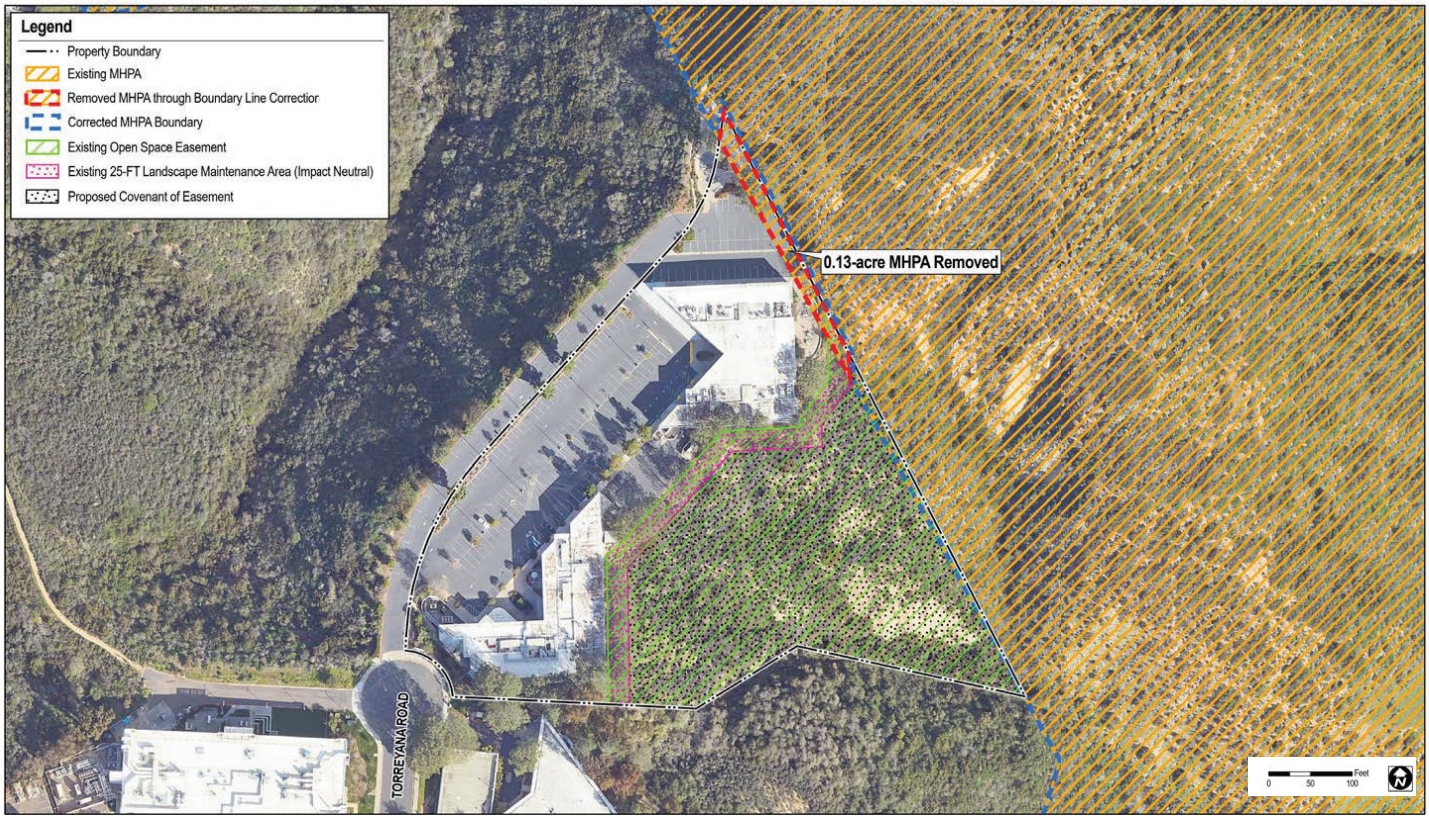
The City of SAN DIEGO

Existing Easements and MHPA

11085 Torreyana Road (Healthpeak Torreyana)/Project No. PRJ-1056938

Development Services Department

FIGURE No. 3



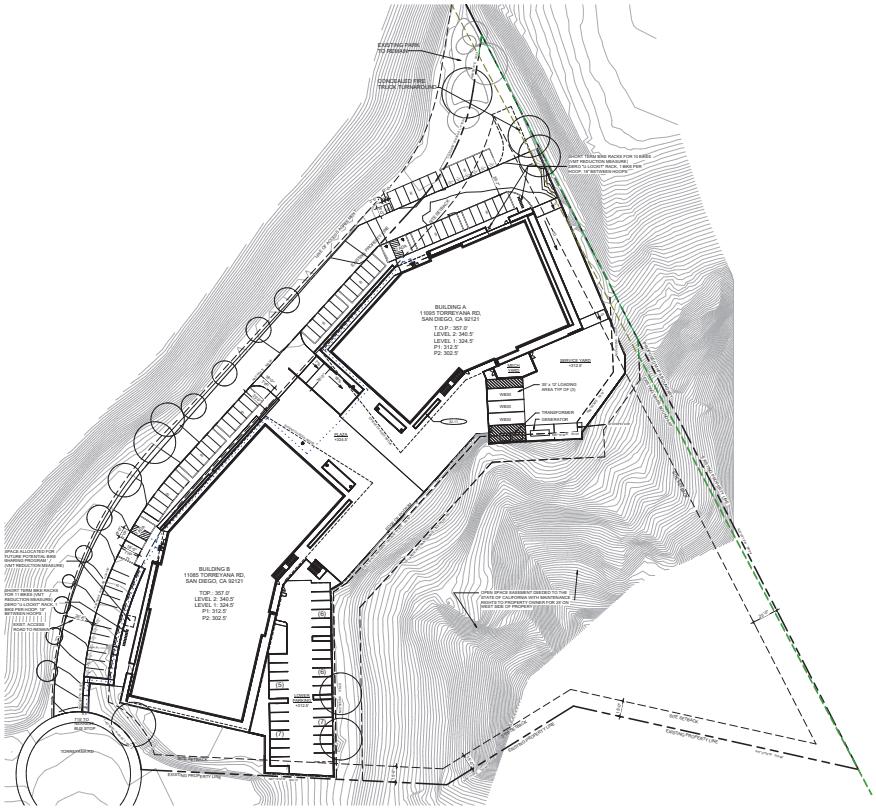
The City of SAN DIEGO

MHPA Boundary Line Correction

11085 Torreyana Road (Healthpeak Torreyana)/Project No. PRJ-1056938

Development Services Department

FIGURE No. 4



SITE PLAN LEGEND

- ACCESSIBLE PATH OF TRAVEL
- LANDSCAPE BUFFER
- EXISITING PROPERTY LINE
- SITE SETBACK
- BRUSH MANAGEMENT ENCROACHMENT
- LIMIT OF WORK
- BUILDING ENTRY
- 5' FROM THE FARTHER OUT FACE OF THE BUILDING
- EXISTING MHPA BOUNDARY
- PROPOSED MHPA BOUNDARY

SITE PLAN GENERAL NOTES

1. NO EXISTING OR PROPOSED TRANSIT STOPS EXIST IMMEDIATELY ADJACENT TO THE SITE.
2. THIS PROJECT MUST COMPLY WITH THE MUNICIPAL CODE REQUIREMENTS FOR THE MAXIMUM HEIGHT OF THE STRUCTURE NOT TO EXCEED 30 FEET (SDMC, SECTIONS 113.0270.A.4.D AND 132.0505). HIGHEST POINT ON ROOF EQUIPMENT, PIPE, VENT, ANTENNA OR OTHER PROJECTION SHALL NOT EXCEED 30 FEET ABOVE GRADE.

KEYNOTES

32.11 RAISED PLANTER

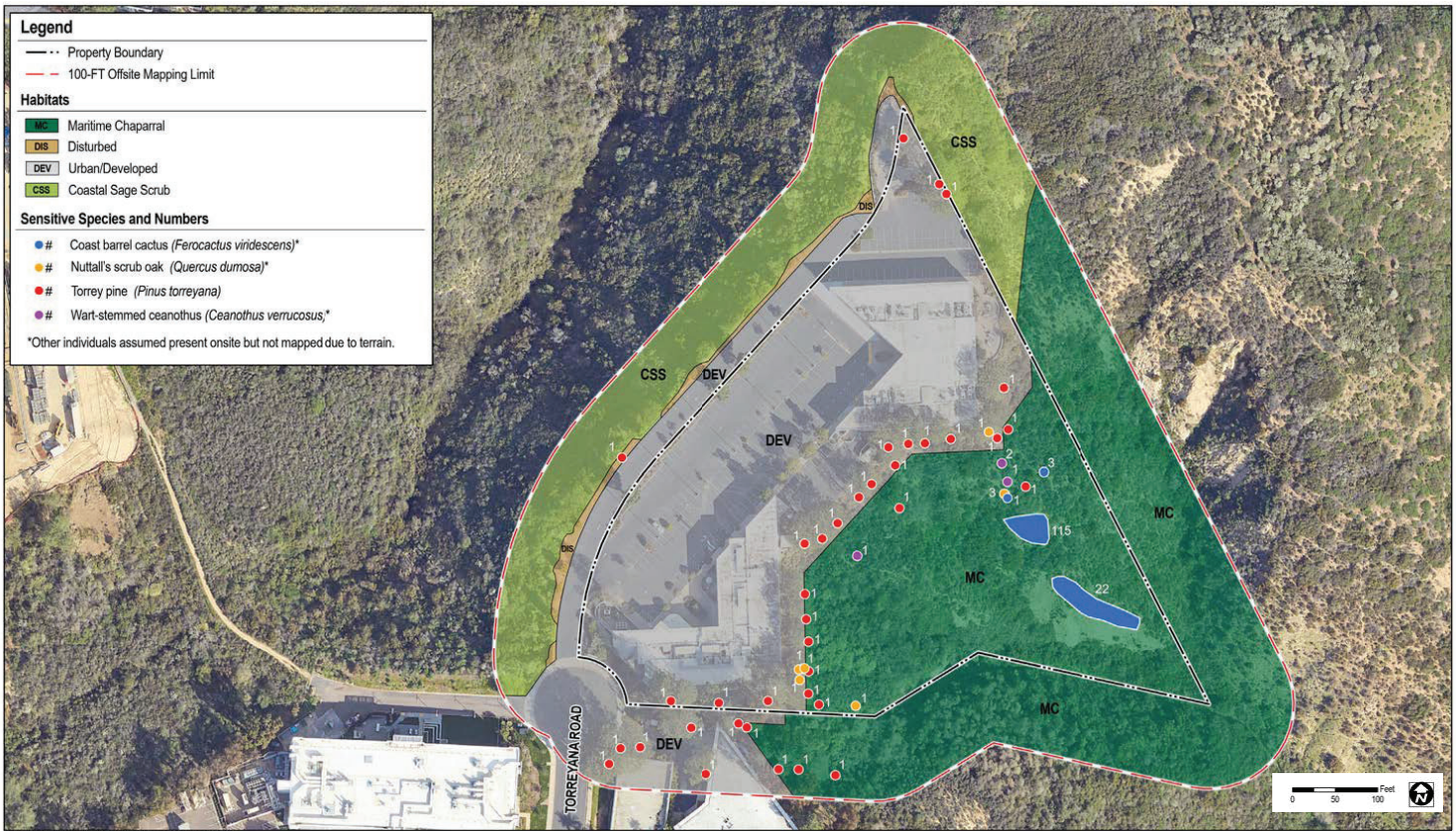
The City of SAN DIEGO

Site Plan

11085 Torreyana Road (Healthpeak Torreyana)/Project No. PRJ-1056938

Development Services Department

FIGURE No. 5



The City of SAN DIEGO

Vegetation Communities and Sensitive Resources/Impacts

11085 Torreyana Road (Healthpeak Torreyana)/Project No. PRJ-1056938

Development Services Department

FIGURE No. 6