



**Environmental Initial Study/
Draft Mitigated Negative Declaration**

**Allison Avenue Transit Oriented Development (TOD) Project
City of La Mesa, County of San Diego, California**

AUGUST 2021

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**CITY OF LA MESA
COMMUNITY DEVELOPMENT DEPARTMENT
DRAFT MITIGATED NEGATIVE DECLARATION**

Project Title:	Allison Avenue Transit Oriented Development (TOD) Project
Lead Agency Name and Address:	City of La Mesa Community Development Department 8130 Allison Avenue La Mesa, CA 91942
Contact Person and Phone Number:	Kerry Kusiak Director of Community Development 619-667-1187
Project Location:	8181 Allison Avenue – Southeast corner of the intersection of Allison Avenue and Date Avenue
La Mesa General Plan Land Use Designation:	Downtown Village Specific Plan Area – Downtown Commercial
Applicant Names and Addresses:	USA Properties Fund, Inc. 3200 Douglas Boulevard, Suite 200 Roseville, CA 95661
Zoning:	Public Use – Civic Center
Assessor's Parcel Numbers:	470-672-22-00

Project Description:

The Allison Avenue TOD Project (project) involves the construction of an affordable workforce residential community on a 1.23-acre site located at 8181 Allison Avenue at the southeast corner of the Allison Avenue/Date Avenue intersection in the Downtown Village area of La Mesa. The project site is located approximately 500 feet southeast of the La Mesa Trolley Station and near local bus routes. The site is vacant and previously contained the City of La Mesa Police Station that was vacated in 2010 and demolished in 2012. The project includes a density bonus pursuant to California Government Code Section 65915 (State Density Bonus Law). The project would provide housing affordable to a variety of household types with incomes ranging from 30 to 70 percent of the area median income. The project also proposes to change the zoning of the site from Civic Center to Downtown Commercial to make the zoning consistent with the General Plan designation (Downtown Commercial).

The proposed project involves the development of a four-story residential structure that would consist of 147 apartment homes and on-site amenities on a podium deck with a parking garage underneath. The proposed building would encompass a total floor area of 145,735 square feet (SF). Apartments would consist of 103 one-bedroom and one-bath and 44 two-bedroom and two-bath units ranging from 578 to 860 SF each. Floor plans include a full kitchen, open concept living space, with closets and storage options. Some units would include balconies.

In addition to the residential units, 4,113 SF of lobby space would be provided. Proposed on-site common open space area would encompass 10,665 SF, which would include two outdoor courtyards, two ground level entry plazas, and a skydeck. An additional 4,759 SF of private open space consisting of balconies would also be provided. The parking garage would be partially subterranean and would encompass 46,700 SF and provide a total of 117 parking spaces for residents.

The residential units are designed around two podium-level outdoor courtyards (east and west) that combine passive, landscaped outdoor amenities including a spa, outdoor living areas with moveable furniture, a double-sided fireplace, fire pit, barbeques, family-style dining, and lighting. A skydeck and lounge area would be created on the top floor of the building. Other proposed amenities include a clubroom, fitness room, and laundry facilities.

The ground floor would include the residential lobby, mechanical/electric rooms, and the parking garage, which includes 97 standard parking spaces, 15 tandem parking spaces, five compact spaces, and bicycle lockers. The podium level (first floor) would include the leasing/management offices, a clubhouse area with game and exercise facilities, and a laundry room. Floors two through four would include residential units and laundry facilities. Vehicular access to the parking garage would occur from one access point along Date Avenue. Pedestrian access to the building would occur at the ground level at the northwest portion of the building at the corner of Allison Avenue and Date Avenue, and at the northeast portion of the building along Allison Avenue.

The building is designed in a contemporary Mediterranean architectural style with flat roofs, cantilevered balconies with mesh panel railings, metal canopies, metal awnings, and painted metal trellises. Building facades would be finished primarily in painted exterior cement plaster (stucco) in white, gray, and orange. The building would also include varying rooflines with horizontal and vertical articulation. The building facades would be finished with stucco and color-blocked in a color palette that ranges from whites and neutrals to more saturated accent colors, including white, light grey, warm grey, and orange. The lobby entrances would include aluminum storefront windows/doors. Building signage in anodized aluminum would also be included and affixed to the building. Parapets would screen the roof mounted mechanical equipment and accommodate stormwater runoff management systems. The proposed building would be wood-frame construction, and the parking garage would be concrete. The maximum building height would be 53 feet above grade, measured to where the roof meets the parapet.

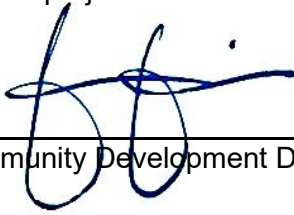
Project landscaping would include a variety of plantings and trees within the courtyards. The streetscape along the Date Avenue project frontage would include palm trees, a variety of ground covers, stormwater plantings. The Allison Avenue streetscape would include a variety of ground plantings and accent trees.

Utility services (water, sewer, storm drain, electricity, gas, and telecommunications) would be provided via connections to existing pipelines/facilities within Allison Avenue and/or Date Avenue. Biofiltration planters would also be provided along the Date Avenue project frontage.

Project construction would be completed in approximately two years and is anticipated to start in August 2022. Grading would require excavation and export of approximately 12,042 cubic yards of cut material.

Community Development Department Determination:

On the basis of the initial environmental study prepared for the proposal, it has been determined that the project would not have an adverse impact on the environment.



Community Development Department, City of La Mesa

August 18, 2021

Date

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1. Project Title

Allison Avenue Transportation Oriented Development (TOD) Project

2. Lead Agency Name and Address

City of La Mesa Community Development Department
8130 Allison Ave
La Mesa, CA 91942

3. Contact Person and Phone Number

Kerry Kusiak
Director of Community Development
619-667-1187

4. Project Location

The project site is located at 8181 Allison Avenue at the southeast corner of the intersection of Allison Avenue and Date Avenue in the Downtown Village area of the City of La Mesa (see Figure 1, *Regional Location*, and Figure 2, *Project Site Location*).

5. Existing Setting

The site is currently minimally improved with an asphalt-paved parking area in the western portion that once served as visitor parking for the former police headquarters, cinderblock walls on the southern and eastern boundaries, and temporary perimeter fencing on the northern and western boundaries. Most of the site is covered in rock, gravel, and asphalt, with some landscaping in the northwest and northeast corners of the fenced-in area and the western parking lot. The current access to the site is from Date Avenue.

Surrounding uses include La Mesa City Hall and surface parking to the north; La Mesa Springs shopping center, La Mesa Spring Valley School District office, and a dental office to the west; the Mason Lodge and La Mesa Village Plaza mixed-use development to the south; and the Orange Line trolley and Spring Street to the east.

6. General Plan Designation/Zoning

The Project site has a General Plan designation of Downtown Commercial and a zoning classification of Public Use – Civic Center.

7. Description of Project

The Allison Avenue TOD Project (project) involves the construction of an affordable workforce residential community on a 1.23-acre site located at 8181 Allison Avenue at the southeast corner of the Allison Avenue/Date Avenue intersection in the Downtown Village area of La Mesa. The project site is located approximately 500 feet southeast of the La Mesa Trolley Station and near local bus routes. The site is vacant and previously contained the City of La Mesa Police Station that was vacated in 2010 and demolished in 2012. The project includes a density bonus pursuant to California Government Code Section 65915 (State Density Bonus Law). The project would provide housing affordable to a variety of

household types with incomes ranging from 30 to 70 percent of the area median income. The project also proposes to change the zoning of the site from Civic Center to Downtown Commercial to make the zoning consistent with the General Plan designation (Downtown Commercial).

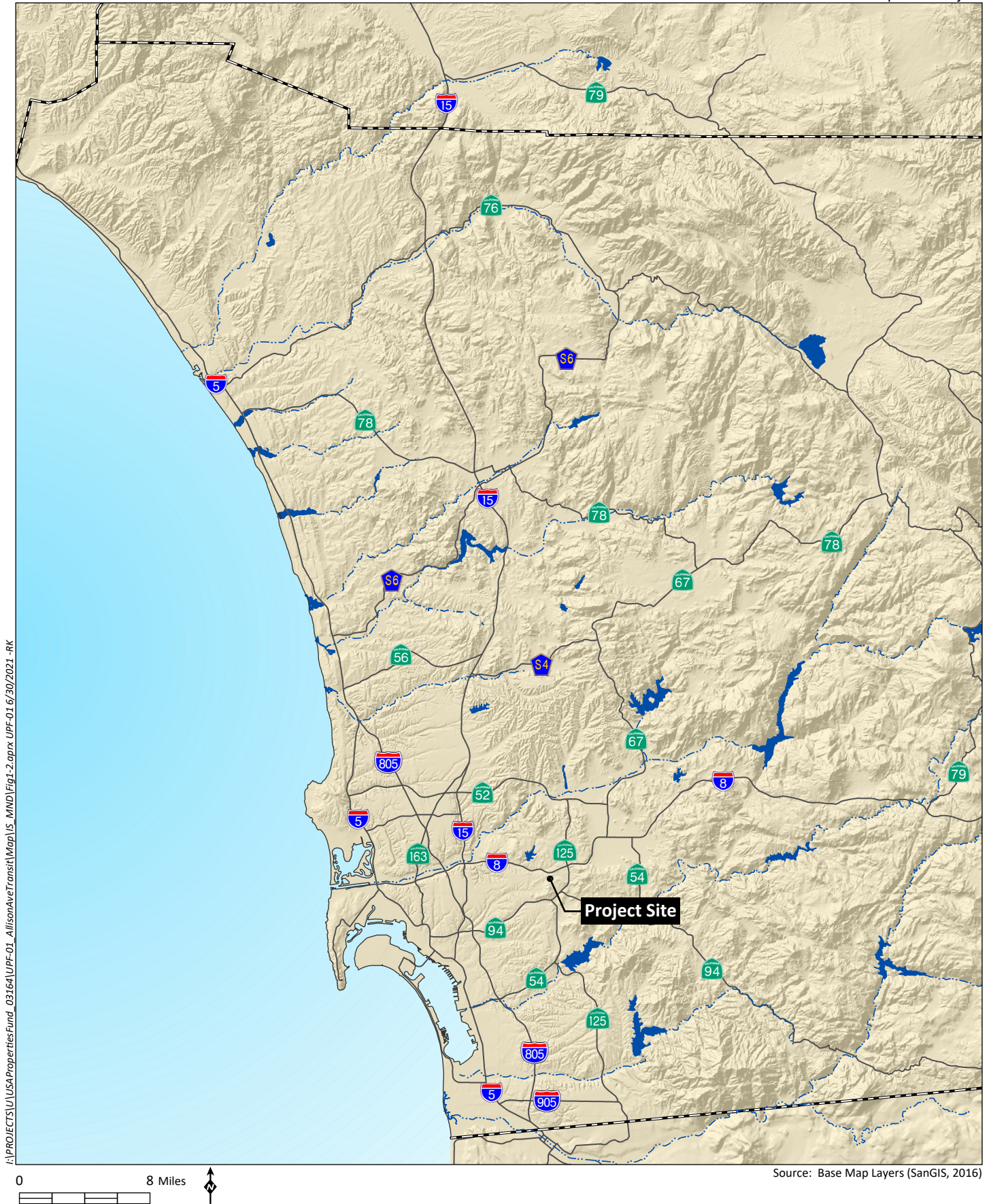
The proposed project involves the development of a four-story residential structure that would consist of 147 apartment homes and on-site amenities on a podium deck with a parking garage underneath. The proposed building would encompass a total floor area of 145,735 square feet (SF). Apartments would consist of 103 one-bedroom and one-bath and 44 two-bedroom and two-bath units ranging from 578 to 860 SF each. Floor plans include a full kitchen, open concept living space, with closets and storage options. Some units would include balconies (see Figures 3a – 3e, *Site Plan*).

In addition to the residential units, 4,113 SF of lobby space would be provided. Proposed on-site common open space area would encompass 10,665 SF, which would include two outdoor courtyards, two ground level entry plazas, and a skydeck. An additional 4,759 SF of private open space consisting of balconies would also be provided. The parking garage would be partially subterranean and would encompass 46,700 SF and provide a total of 117 parking spaces for residents.

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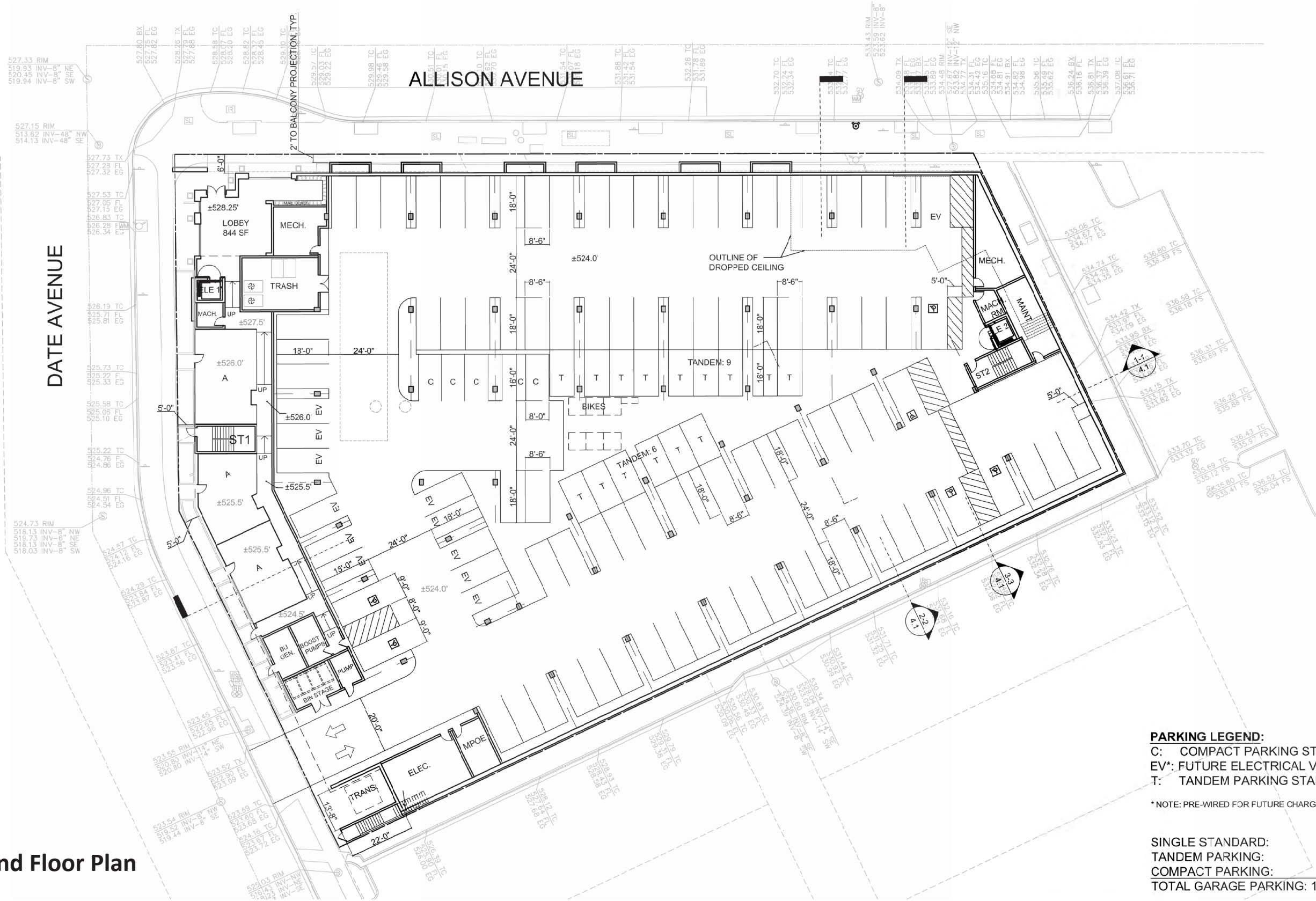
The building is designed in a contemporary Mediterranean architectural style with flat roofs, cantilevered balconies with mesh panel railings, metal canopies, metal awnings, and painted metal trellises. Building facades would be finished primarily in painted exterior cement plaster (stucco) in white, gray, and orange. The building would also include varying rooflines with horizontal and vertical articulation. The building facades would be finished with stucco and color-blocked in a color palette that ranges from whites and neutrals to more saturated accent colors, including white, light grey, warm grey, and orange. The lobby entrances would include aluminum storefront windows/doors. Building signage in anodized aluminum would also be included and affixed to the building. Parapets would screen the roof-mounted mechanical equipment and accommodate stormwater runoff management systems. The proposed building would be wood-frame construction, and the parking garage would be concrete. The maximum building height would be 53 feet above grade, measured to where the roof meets the parapet (see Figures 4a – 4d, *Conceptual Building Design*).



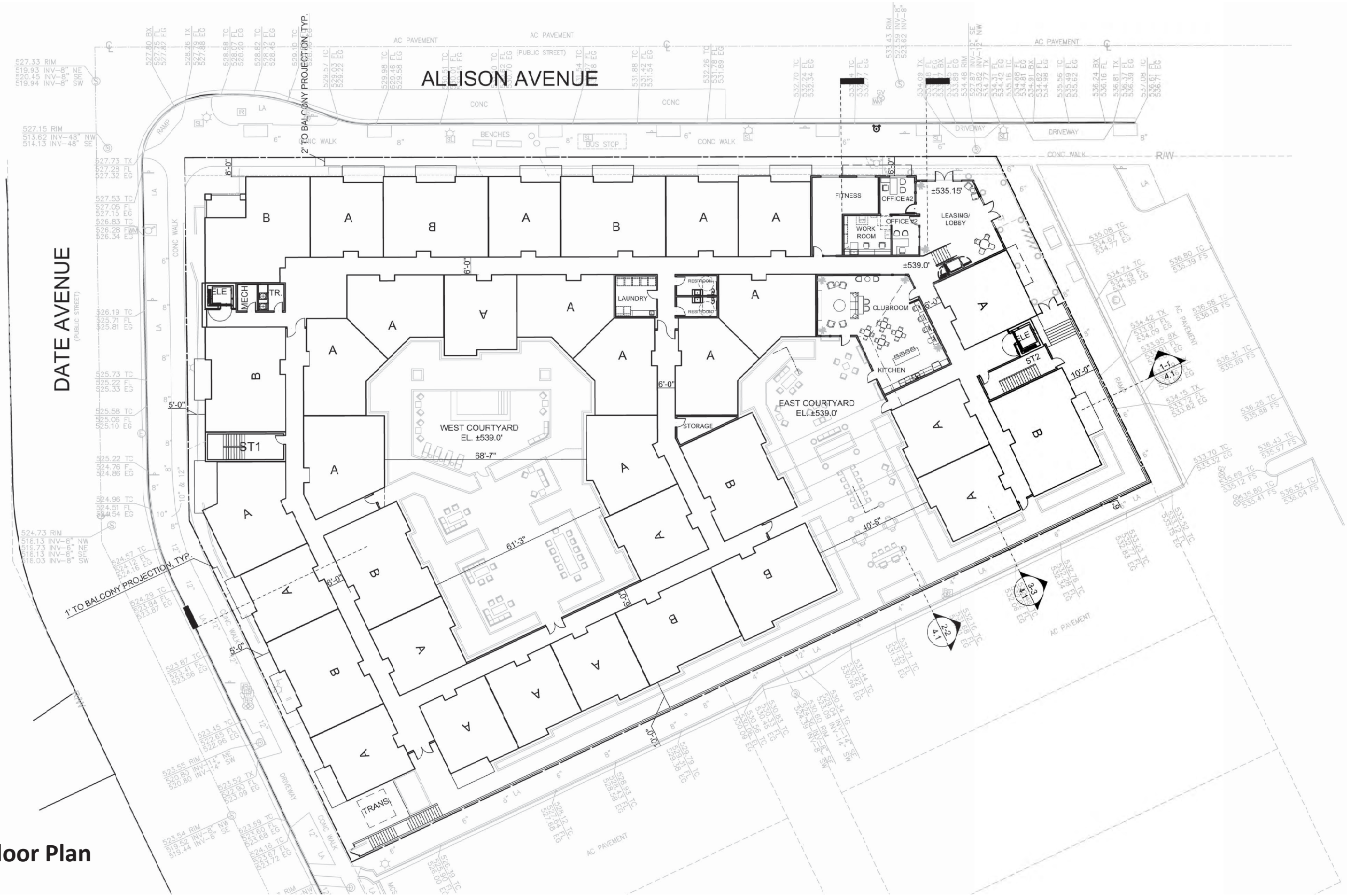


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Ground Floor Plan



Source: USA Properties Funds 2021



Source: USA Properties Funds 2021



HELIX
Environmental Planning



HELIX
Environmental Planning



HELIX
Environmental Planning



View of Trolley Plaza at Northeast Corner

Source: USA Properties Funds 2021



View of Plaza at Allison Ave and Date Ave

Source: USA Properties Funds 2021



View of Southwest Corner

Source: USA Properties Funds 2021



View of Southeast Corner

Source: USA Properties Funds 2021

Project landscaping would include a variety of plantings and trees within the courtyards. The streetscape along the Date Avenue project frontage would include palm trees, a variety of ground covers, stormwater plantings. The Allison Avenue streetscape would include a variety of ground plantings and accent trees (see Figure 5, *Landscape Plan*).

Utility services (water, sewer, storm drain, electricity, gas, and telecommunications) would be provided via connections to existing pipelines/facilities within Allison Avenue and/or Date Avenue. Biofiltration planters would also be provided along the Date Avenue project frontage.

Project construction would be completed in approximately two years and is anticipated to start in August 2022. Grading would require excavation and export of approximately 12,042 cubic yards of cut material.

8. Required Approvals

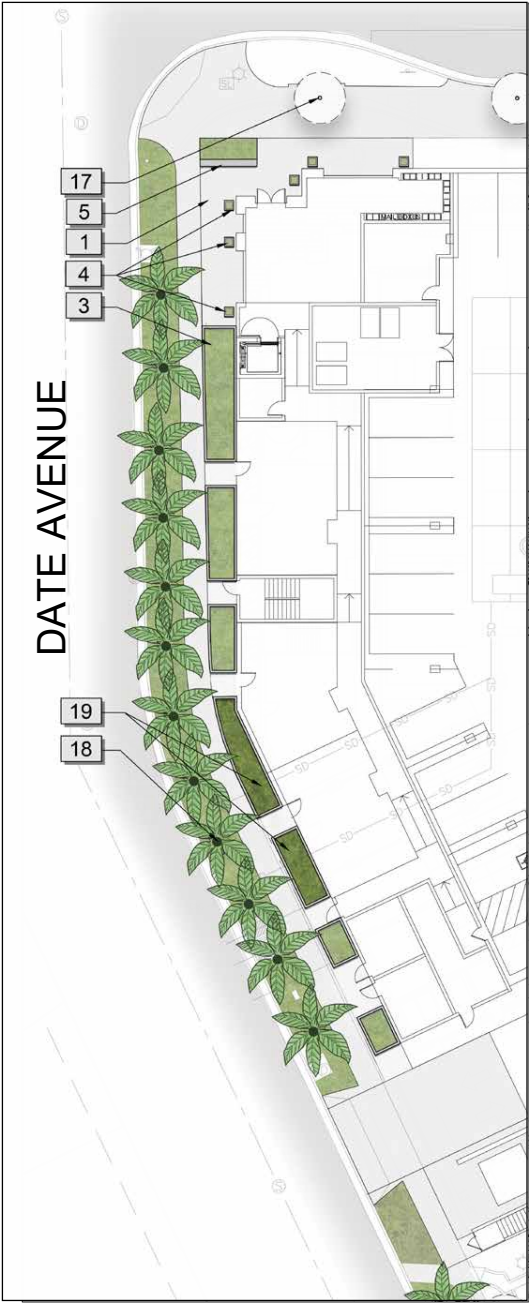
The project would require the approval of the San Diego Regional Water Quality Control board (RWQCB) for a National Pollution Discharge Elimination System (NPDES) Construction General Permit coverage. The following City of La Mesa approvals would also be required:

- Approval of Site Plan, Landscape Plan, and Building Architecture by the Design Review Board
- Adoption of this IS/MND and a Mitigation Monitoring and Reporting Program
- Approval of zone change of the project site from Civic Center to Downtown Commercial
- Building Permit
- Grading Permit

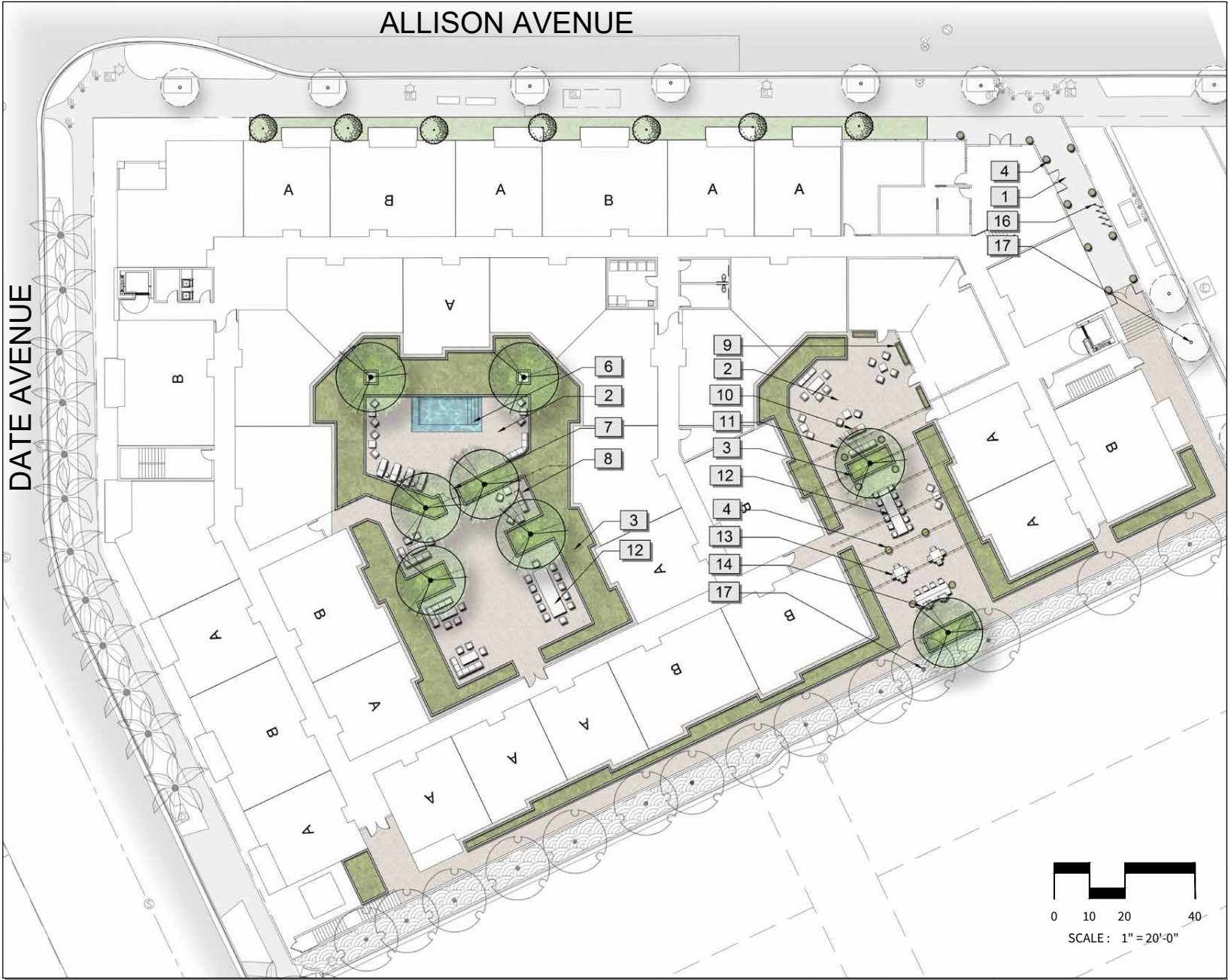
This project would potentially affect the environmental factors checked, involving at least one impact that is a “Potentially Significant Impact” or is “Less than Significant with Mitigation Incorporated” as indicated by the checklist on the following pages.

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

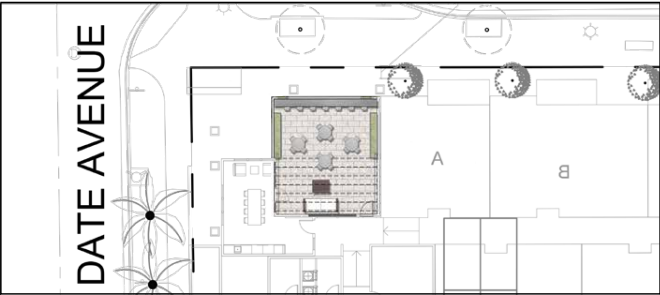
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1 GROUND LEVEL



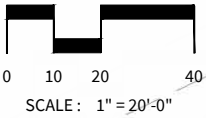
2 PODIUM LEVEL



3 FOURTH FLOOR SKY DECK

REFERENCE NOTES SCHEDULE

SYMBOL	DESCRIPTION
1	PEDESTRIAN CONCRETE PAVING. COLOR: NATURAL GRAY
2	ENHANCED PEDESTRIAN CONCRETE PAVING WITH INTEGRAL COLOR
3	PLANTER
4	ACCENT POT
5	POURED-IN-PLACE CONCRETE SEATWAL
6	SPA
7	SPA FENCE W/ GATE
8	OUTDOOR SEATING
9	MODULAR PLANTERS
10	DOUBLE-SIDED FIRE PLACE
11	FESTOON LIGHTS
12	FAMILY-STYLE DINING
13	MOVABLE DINING
14	BBQ
16	BIKE RACKS
17	EXISTING TREE TO REMAIN
18	EXISTING TREE TO BE REPLACED
19	LID PLANTER



Source: USA Properties Funds 2021

Determination

Based on this initial evaluation:

- ☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☒ I find that 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.
- ☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find that 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. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that 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.

Signature

Kerry Kusiak

Printed Name

August 18, 2021

Date

Director of Community Development

Title

Evaluation of Environmental Impacts

1. A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (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 would not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
4. “Less than Significant with Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level.
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063I(3)(D). In this case, a brief discussion should identify the following:
 - a) Earlier Analyses Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are “Less than Significant with Mitigation Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
9. The explanation of each issue should identify:
 - a) the significance criteria or threshold, if any, used to evaluate each question; and
 - b) the mitigation measure identified, if any, to reduce the impact to less than significant.

Environmental Checklist

1. Aesthetics

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, would the project:				
a. Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

Public Resources Code Section (PRC) 21099 states, "Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment." PRC 21099 defines a Transit Priority Area (TPA) as an area within one-half mile of a major transit stop that is existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program or applicable regional transportation plan. Further, PRC 21099 defines an infill site as a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses. While a public agency has the authority to adopt significance thresholds pertaining to aesthetics, the City has not adopted significance thresholds beyond what is contained in Appendix G of the CEQA Guidelines and therefore, the project would not have significant aesthetic impacts pursuant to PRC 21099. However, for purposes of disclosure, this document contains a discussion of each of the CEQA Appendix G thresholds as they pertain to aesthetics.

- a. The Land Use and Urban Design Element of the La Mesa General Plan identifies specific vistas that contribute to the City's community image. Vistas are described in the La Mesa General Plan as views with a narrow angle characterized by long vertically defined spaces that open to allow sight of a few select elements. The General Plan designates four vistas within the City none of which are on or adjacent to the project site: the view of Lake Murray from Baltimore Drive; the view from Fletcher Parkway near Baltimore Drive; and two views along La Mesa Boulevard in the Downtown Village. Figure LD-10, *Community Image*, of the City's General Plan Land Use and Urban Design Element (City 2012) identifies the nearest designated vista to the project site as a grouping of downtown palm trees along La Mesa Boulevard, west of Spring Street and the project site itself is approximately 800 feet north of

La Mesa Boulevard. At the pedestrian level, views along La Mesa Boulevard are linear and limited to corridor and adjacent development. The built-up urban nature of the Downtown Village area precludes large expansive views. There are several intervening structures between La Mesa Boulevard and the project site, including a mixed-use residential building with five levels above ground. The construction of a multi-story residential building would be a notable visual change in relation to the existing site conditions; however, its visibility from La Mesa Boulevard would be limited as it is not within the street corridor. Additionally, the proposed building would not block views into La Mesa Boulevard since intervening structures currently obstruct any direct views of La Mesa Boulevard from the project site and surrounding area. Therefore, the project would not result in a substantial adverse effect on a scenic vista, and no impacts would occur.

- b. No designated scenic resources or scenic highways are present within or adjacent to the project site. The site is vacant and does not contain any historic buildings. The nearest designated scenic highway is a two-mile portion of State Route (SR) 125 as it transitions from SR 94 to I-8, approximately one mile east of the project site. No trees or rock outcrops would be disturbed as all improvements would occur in the existing vacant lot, which is comprised of a combination of asphalt and gravel. Thus, the project would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway. No impacts to scenic resources would occur.
- c. The protection of scenic resources is guided by the La Mesa General Plan and the Downtown Village Specific Plan (DVSP). The DVSP bridges the gap between the general policy-oriented language of the General Plan and the more detailed criteria guiding the development of specific sites. As such, the DVSP contains a series of design guidelines, and development within the DVSP is subject to design review in relation to the guidelines. Additionally, the La Mesa Urban Design Program applies design principles during a review process that are intended to ensure that new development fits into the fabric of the community. The program includes guidelines for evaluating public and private projects based on the community image concept and hierarchy of land use ranging from regional to site-specific plans. The stated goal of the La Mesa Urban Design Program is to “Preserve and enhance the community character and sense of place by delivering projects and programs that build upon positive design features.” Projects subject to design review include new or substantially renovated commercial properties, multi-unit residential developments, projects within the City’s mixed-use corridors, and sites within the DVSP area.

The DVSP identifies that to preserve the surrounding residential neighborhoods, that residential development in the DVSP should occur in a compact manner and any land uses that include greater than two stories shall designate all floors above the second as residential. The project is consistent with this in that the entire development consists of residential land uses and the upper floors contain residential units.

The DVSP also establishes policies for development. The DVSP notes that Allison Avenue is to visually tie the Civic Center complex to the rest of the village. Further, this area is to be designed to have a pedestrian scale and emphasize the overall design goal of the DVSP to promote pedestrian scale buildings, streets, and parking. One of the project objectives is to reinforce the pedestrian-oriented civic and commercial district by embracing connectivity and walkability, and it accomplishes this by lining the proposed semi-subterranean parking garage with dwelling units along Date Avenue and by carving out entries with pedestrian pocket plaza areas facing the planned new City Hall Complex and Town Square to the north as well as the trolley station to the east.

In relation to the La Mesa Urban Design Program goals, the project is designed to reflect the architectural heritage of La Mesa and greater San Diego. Building materials would include a range of finishes, colors, and three-dimensional architectural elements, such as deep roof overhangs, colorful shade elements, and cantilevered balconies. This articulation in building massing allows for a variety of spaces and textures, to enhance the public's experience, along with shaded, tree-lined sidewalks and landscaped/hardscaped pedestrian plazas. The building facades would be color-blocked in a color palette that ranges from whites and neutrals to more saturated accent colors, including white, light grey, warm grey, and orange. Metal mesh railing treatments on outdoor balconies and a dark bronze painted shade trellis at the skydeck terrace create visual interest and depth to the elevations.

The project would require a zone change from Civic Center to Downtown Commercial. The City's Municipal Code, Title 24, Section 24.06 contains the development standards for the Downtown Commercial zone. As stated in Section 24.06.030, the objectives for the Downtown Commercial development standards that are applicable to aesthetics include:

- Types of buildings, walls, and fences shall be architecturally pleasing in appearance.
- Setback or lack of setbacks shall not be utilized to locate a building or nonbuilding structure which is out of character with adjacent properties.
- Lighting must be of a type and situated in such a manner as to not create safety problems for either pedestrians or drivers.
- All setbacks shall be landscaped.

The project is designed to be cohesive with the character of the surrounding Civic Center and Downtown Village. As stated above, the project is designed to reflect the architectural heritage of La Mesa and greater San Diego. The project is designed in accordance with the proper setbacks including those pertaining to balconies, open public spaces, and landscaping. As required and discussed further below in item 1.d., project lighting would be directed downward onto the property and designed to prevent spillover onto adjacent properties, including roadways. The project would extend to a height of 51.5 feet, greater than the 46 feet established for the Downtown Commercial zone, but the proposed building height would be allowable through the density bonus waiver in conjunction with the allocation of affordable housing. However, it is also noted that the City's zoning code allows for height exceptions to height limitations through a special permit by the planning commission although this project would not require a special permit for the proposed height. Moreover, while the project would exceed the 46-foot height limit of the Downtown Commercial Zone, this is compatible with surrounding development, such as the adjacent mixed-use residential structure that extends to a height of greater than 50 feet.

Therefore, through the project's design and strategic location of residential land uses near the various civic, commercial, and transportation land uses and its emphasis on pedestrian accessibility, the project supports the policies of the DVSP and La Mesa Urban Design Program. Likewise, the project is designed in accordance with the development standards set forth in the City's zoning code by employing architectural features that are consistent with the character of the surrounding Civic Center and Downtown Village area, adhering to setbacks, and through light features that would not spillover onto adjacent uses. In addition, the increase in building height is permitted through a density bonus waiver. Moreover, in relation to consistency of character, the project would be of a similar height as the adjacent

mixed-use structure. Thus, the project would not introduce a structure that would be visually incompatible or out of scale with surrounding development. Therefore, the project would not conflict with applicable zoning and other regulations governing scenic quality. Impacts would be less than significant in relation to this issue.

- d. 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 its proximity to nearby light-sensitive areas.

The project site is in a developed urban area with substantial existing nighttime lighting from the existing civic, commercial/retail, multi-family residential, and transportation facility land uses nearby. The existing light sources in the project area include building lights, streetlights, security lights, and the lighting at the trolley station.

The project would contain multiple new sources of exterior lighting, such as security lighting along internal walkways, plazas, project signage, and accent lighting on the building. Proposed lights would be at a low level as possible, timed as appropriate, directed downward, and shielded to minimize spillover onto adjacent properties. Additionally, interior lights from the residential units would be a new source of illumination. Although project lighting would produce light levels brighter than currently exists on the site, the net increase in nighttime lighting would not be considered substantial due to the urbanized nature of the site and surrounding area. Exterior lighting would be subject to Section 24.06.030 of the City's Zoning Code, which requires lighting to be designed, installed, and maintained to prevent light spillover onto adjacent properties. Furthermore, the proposed building and other site amenities would not include large expanses of reflective material or surfaces such as glass or metal. Therefore, the proposed project would not result in a significant impact related to new sources of substantial light and glare that would adversely affect day or nighttime views in the area. Impacts would be less than significant impact.

2. Agriculture and Forestry Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:

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

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c. Conflict with existing zoning for or cause rezoning of forest land (as defined in Public Resources Code Section 12220(g)); timberland (as defined by Public Resources Code Section 4526); or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	☐	☐	☐	☒
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒
a. A review of the California Department of Conservation (DOC) online California Important Farmland Finder Map query program designates the project site and surrounding area as Urban Built-Up Land. The Urban Built-Up Land designation applies to land that the DOC has identified as being used for a variety of urban uses and contains man-made structures or buildings under construction and the infrastructure required for development that are specifically designed to serve that land. No agricultural resources or operations are located within the vicinity of the project area. Therefore, the project would not convert farmland to non-agricultural use. No impact would occur in relation to this issue.				
b. 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 that 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 2.a, the project site is classified by the DOC as Urban and Built-Up Land where neither farmland nor agricultural resources are present. The project site is not currently zoned for agricultural use, and the proposed zone of Downtown Commercial would similarly not allow for agricultural uses. Additionally, it is not 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. Further, the City of La Mesa General Plan Land Use Map classifies the land as Downtown Commercial. Therefore, the project would not conflict with existing zoning for agricultural use, or a Williamson Act contract. No impact would occur in relation to this issue.				
c. Public Resources Code Section 12220(g) defines “forest land” as land that can support 10 percent native cover of any species, including hardwoods, under natural conditions, and				

that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits. Based on this definition, no forest land occurs within or adjacent to the project site. Moreover, there is no land zoned as forest land or timberland that exists within the project site or within its vicinity. The project site contains mature street trees along the project site boundaries, and there are trees associated with ornamental landscaping scattered throughout the greater project area; however, there is no concentration of trees that would constitute a forest. Therefore, the proposed project would not conflict with existing zoning for forest land or timberland, and no impact would occur in relation to this issue.

- d. As stated in item 2.c above, implementation of the project would not result in the loss or conversion of forest land to non-forest use because no forest land exists on the project site or in the surrounding area. Therefore, no impact would occur in relation to this issue.
- e. As stated in items 2.a and 2.c above, implementation of the project would not result in the conversion of agricultural land to non-agricultural use or forest land to non-forest use. Therefore, no impact would occur in relation to this issue.

3. Air Quality

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	☒
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c. Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

An Air Quality Technical Report (AQTR) was prepared for the project, which is included as Appendix A to this IS/MND (HELIX 2021a). The results of this analysis are summarized in this section.

- a. The San Diego Air Pollution Control District (SDAPCD) and San Diego Association of Governments (SANDAG) are responsible for developing and implementing the clean air plan for attainment and maintenance of the ambient air quality standards in the San Diego Air Basin (SDAB). The regional air quality plan for the County is SDAPCD's 2020 Plan for Attaining the National Ambient Air Quality Standards for Ozone in San Diego County (Attainment Plan; SDAPCD 2020). The Attainment Plan outlines SDAPCD's plans and control measures designed to attain the California Ambient Air Quality Standards (CAAQS)

for ozone. In addition, the SDAPCD relies on the State Implementation Plan (SIP), which includes the SDAPCD's plans and control measures for attaining the ozone National Ambient Air Quality Standards (NAAQS). These plans accommodate emissions from all sources, including natural sources, through the 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 the California Air Resources Board (CARB), and the emissions and reduction strategies related to mobile sources are considered in the Attainment Plan and SIP.

The Attainment Plan relies on information from CARB and SANDAG, including projected growth in San Diego County, mobile, area, and all other source emissions in order to project future emissions and determine from that the strategies necessary for the reduction of stationary source emissions through regulatory controls. CARB mobile source emission projections and SANDAG growth projections are based on population, vehicle trends, and land use plans developed by the cities and by the County. As such, projects that propose development that is consistent with the growth anticipated by the general plans would be consistent with the Attainment Plan. In the event that a project proposes development, which is less dense 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 City General Plan and SANDAG's growth projections upon which the Attainment Plan is based, the project may be in conflict with the Attainment Plan and SIP and may have a potentially significant impact on air quality. This situation would warrant further analysis to determine if the project and the surrounding projects exceed the growth projections used in the Attainment Plan for the specific subregional area.

A project would be inconsistent with the Attainment Plan and/or SIP if it results in population and/or employment growth that exceed growth estimates for the area. While the project would increase the number of residential dwelling units in the City, and would contribute to transportation-generated air pollutants, this would generally be in response to population growth forecasts and the resulting County-wide demand for housing. The Attainment Plan and SIP rely on the same information from the SANDAG growth forecast to develop emission inventories and emission reduction strategies that are included in the attainment demonstration for the air basin. The project has a land use designation of Downtown Commercial, and the project's proposed apartments are a permitted use consistent with the General Plan land use designation. Therefore, the project would not result in population growth beyond the levels assumed for the region, and the project would not conflict with any population projections for the region and would, therefore, be consistent with the Attainment Plan and SIP. In addition, as discussed in item 3.b below, the project would not result in a significant air quality impact with regards to emissions of ozone precursors or criteria air pollutants. Due to the housing density and proximity of the project to the La Mesa Boulevard Trolley Station and MTS bus stops, the project is considered TOD. Project impacts related to vehicle miles traveled (VMT) would be less than significant (LLG 2021). Because mobile emissions (which result from VMT) are the primary source of criteria pollutants for residential development projects, from an air quality perspective, the project would result in lower mobile source emissions per resident compared to equivalent new development not located in a TOD area. Therefore, the proposed project would not conflict with or obstruct the implementation of the Attainment Plan. No impact would occur in relation to this issue.

- b. The project would generate criteria pollutants and precursors in the short-term during construction and the long-term during operation. To determine whether a project would result in a cumulatively considerable net increase in criteria pollutants that would violate an

air quality standard or contribute substantially to an existing or projected air quality violation, a project's emissions are evaluated based on the quantitative emission thresholds established by the SDAPCD, as shown in Table 1, *Screening-Level Thresholds for Air Quality Impact Analysis*.

Table 1
SCREENING-LEVEL THRESHOLDS FOR AIR QUALITY IMPACT ANALYSIS

Pollutant	Total Emissions		
Construction Emissions (Pounds/Day)			
Respirable Particulate Matter (PM ₁₀)	100		
Fine Particulate Matter (PM _{2.5})	67		
Oxides of Nitrogen (NO _x)	250		
Oxides of Sulfur (SO _x)	250		
Carbon Monoxide (CO)	550		
Volatile Organic Compounds (VOCs)	137		
Operational Emissions			
	lbs. per Hour	lbs. per Day	Tons per Year
Respirable Particulate Matter (PM ₁₀)	---	100	15
Fine Particulate Matter (PM _{2.5})	---	67	10
Oxides of Nitrogen (NO _x)	25	250	40
Oxides of Sulfur (SO _x)	25	250	40
Carbon Monoxide (CO)	100	550	100
Lead and Lead Compounds	---	3.2	0.6
Volatile Organic Compounds (VOC)	---	137	15
Toxic Air Contaminant Emissions			
Excess Cancer Risk	1 in 1 million 10 in 1 million with T-BACT		
Non-Cancer Hazard	1.0		

Source: HELIX 2021a

T-BACT = Toxics-Best Available Control Technology

Construction Emissions

The project's temporary construction emissions were estimated using CalEEMod. The results of the modeling of the project's construction emissions of criteria pollutants and precursors are shown in Table 2, *Daily Construction Emissions*. The data are presented as the maximum anticipated daily emissions for comparison with the SDAPCD thresholds. The complete CalEEMod output and a detailed discussion on methodology is provided in the AQTR (HELIX 2021a) in Appendix A to this IS/MND.

Table 2
DAILY CONSTRUCTION EMISSIONS

Construction Activity	ROG (lb./day)	NO_x (lb./day)	CO (lb./day)	SO_x (lb./day)	PM₁₀ (lb./day)	PM_{2.5} (lb./day)
2022 Site Preparation	1.5	14.2	9.8	<0.1	3.7	2.2
2022 Grading/Excavation	2.4	30.3	20.0	<0.1	5.2	2.8
2022 Podium Construction	2.4	16.1	18.0	<0.1	1.9	1.0
2023 Building Construction	1.9	13.0	15.9	<0.1	1.7	0.8
2024 Architectural Coating	7.3	1.3	2.3	<0.1	0.3	0.1
Maximum Daily Emissions¹	9.1	30.3	20.0	<0.1	5.2	2.8
<i>SDAPCD Screening Thresholds</i>	<i>137</i>	<i>250</i>	<i>550</i>	<i>250</i>	<i>100</i>	<i>67</i>
Significant Impact?	No	No	No	No	No	No

Source: HELIX 2021a

¹ Maximum daily emissions of ROG would occur during concurrent 2024 building construction and architectural coating.

lb./day = pounds per day; ROG = reactive organic gas; NO_x = nitrogen oxides; CO = carbon monoxide; SO_x = sulfur oxides; PM₁₀ = 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, the project's short-term construction-related criteria pollutant and precursor emissions would be below the SDAPCD's screening-level significance thresholds. Therefore, the project's construction activities would not result in a cumulatively considerable net increase of criteria pollutants that would violate any air quality standard or contribute substantially to an existing or projected air quality violation, and the impact would be less than significant.

Operations Emissions

The project's long-term maximum daily and annual operational emissions were also estimated using CalEEMod. The results of the modeling of the project's operational emissions of criteria pollutants and precursors are shown in Table 3, *Operational Emissions*. The data are presented as the maximum anticipated daily emissions and annual emissions for comparison with the SDAPCD thresholds. The complete CalEEMod output and a detailed discussion on methodology is provided in the AQTR (HELIX 2021a) in Appendix A to the IS/MND.

**Table 3
OPERATIONAL EMISSIONS**

Source	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Daily Emissions (pounds per day)						
Area	4.0	2.3	13.1	<0.1	0.2	0.2
Energy	<0.1	0.3	0.1	<0.1	<0.1	<0.1
Mobile	2.1	2.1	17.8	<0.1	3.9	1.1
Total Project Emissions¹	6.1	4.7	31.0	<0.1	4.2	1.3
<i>SDAPCD Daily Thresholds</i>	<i>137</i>	<i>250</i>	<i>550</i>	<i>250</i>	<i>100</i>	<i>67</i>
Exceed Daily Threshold?	No	No	No	No	No	No
Annual Emissions (tons per year)						
Area	0.7	0.1	1.1	<0.1	<0.1	<0.1
Energy	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1
Mobile	0.4	0.4	3.2	<0.1	0.7	0.2
Total Project Emissions¹	1.0	0.5	4.3	<0.1	0.7	0.2
<i>SDAPCD Annual Screening Thresholds</i>	<i>15</i>	<i>40</i>	<i>100</i>	<i>40</i>	<i>15</i>	<i>10</i>
Exceed Annual Threshold?	No	No	No	No	No	No

Source: HELIX 2021a

¹ Totals may not sum due to rounding.

VOC = volatile organic compound; NO_x = nitrogen oxides; CO = carbon monoxide; SO_x = sulfur oxides; PM₁₀ = particulate matter 10 microns or less in diameter; PM_{2.5} = particulate matter 2.5 microns or less in diameter; SDAPCD = San Diego County Air Pollution Control District

As shown in Table 3, the project's long-term emissions of criteria pollutants and precursors would not exceed the SDAPCD daily or annual screening thresholds. Therefore, the project's operational activities would not result in a cumulatively considerable net increase of criteria pollutants that would violate any air quality standard or contribute substantially to an existing or projected air quality violation, and the impact would be less than significant.

- c. Land uses that are commonly considered sensitive receptors include residences, schools, hospitals, and daycare centers. The closest existing sensitive receptors to the project site are single-family residences approximately 355 feet northeast of the project site, across Allison Avenue and Spring Street; and multi-family residences approximately 370 feet southwest of the project site, across Date Avenue. The closest school is the Christ Lutheran School, approximately 1,580 feet (0.3 mile) to the west. The closest daycare center is the Grey Rabbit Pre-School, approximately 1,900 feet (0.4 mile) to the south. There are no hospitals located within 0.5 mile of the project site. The primary pollutants of concern for sensitive receptors are toxic air contaminants (TACs) and carbon monoxide (CO) hotspots.

Construction Activities

Implementation of the project would result in the use of heavy-duty construction equipment, haul trucks, on-site generators, and construction worker vehicles. These vehicles and equipment could generate the TAC diesel particulate matter (DPM). Generation of DPM from construction projects typically occurs in a localized area (e.g., at the project site) for a short period of time. Because construction activities and subsequent emissions vary depending on the phase of construction (e.g., grading, building construction), the construction-related emissions to which nearby receptors are exposed to would also vary throughout the construction period. During some equipment-intensive phases such as grading, construction-related emissions would be higher than other less equipment-intensive phases such as building construction.

The dose (of TAC) to which receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance in the environment and the extent of exposure a person has with the substance; a longer exposure period to a fixed amount of emissions would result in higher health risks. Current models and methodologies for conducting cancer health risk assessments are associated with longer-term exposure periods (typically 30 years for individual residents based on guidance from the Office of Environmental Health Hazard Assessment [OEHHHA]) and are best suited for evaluation of long duration TAC emissions with predictable schedules and locations. These assessment models and methodologies do not correlate well with the temporary and highly variable nature of construction activities. Cancer potency factors are based on animal lifetime studies or worker studies, where there is long-term exposure to the carcinogenic agent. There is considerable uncertainty in trying to evaluate the cancer risk from projects that will only last a small fraction of a lifetime (OEHHHA 2015). Considering this information, the highly dispersive nature of DPM, and the fact that construction activities would occur at various locations throughout the project site, it is not anticipated that construction of the project would expose sensitive receptors to substantial DPM concentrations. Therefore, this impact would be less than significant.

Operational Activities

Carbon Monoxide Hotspots

Vehicle exhaust is the primary source of CO. In an urban setting, the highest CO concentrations are generally found within close proximity to congested intersections. Under typical meteorological conditions, CO concentrations tend to decrease as distance from the emissions source (i.e., congested intersection) increase. Project-generated traffic has the potential of contributing to localized “hot spots” of CO off-site. Because CO is a byproduct of incomplete combustion, exhaust emissions are worse when fossil-fueled vehicles are operated inefficiently, such as in stop-and-go traffic or through heavily congested intersections, where the level of service (LOS) is severely degraded.

CARB recommends evaluation of the potential for the formation of locally high concentrations of CO, known as CO hot spots. A CO hot spot is a localized concentration of CO that is above the state or national one-hour or eight-hour CO ambient air standards. To verify that the project would not cause or contribute to a violation of the one-hour and eight-hour CO standards, an evaluation of the potential for CO hot spots at nearby intersections was conducted.

The Transportation Impact Analysis (TIA) prepared for the project (LLG 2021) evaluated whether there would be a change in the LOS at the intersections affected by the proposed project. In accordance with the Transportation Project-Level Carbon Monoxide Protocol, CO hot spots are typically evaluated when: (a) the LOS of an intersection decreases to a LOS E or worse because of the project; (b) signalization and/or channelization is added to an intersection; and (c) sensitive receptors such as residences, schools, hospitals, etc., are located in the vicinity of the affected intersection or roadway segment (California Department of Transportation [Caltrans] 1998).

According to the TIA, all of the analyzed intersections are forecast to operate at LOS C or better in the project opening year condition, without implementation of the project. Implementation of the project would not result in the LOS of any of the analyzed intersections degrading (LLG 2021). Therefore, consistent with the CO Protocol, operation

of the project would not result in the exposure of sensitive receptors to substantial localized CO concentrations. Impacts to sensitive receptors by CO hotspots would be less than significant.

New Sensitive Receptors

As a residential development, the project would site new sensitive receptors. The CARB siting recommendations within the Air Quality and Land Use Handbook suggests avoiding new siting sensitive receptors within: 1,000 feet of a warehouse distribution center, 300 feet of a large gas station (defined as a facility with a throughput of 3.6 million gallons per year or greater), 50 feet of a typical gas dispensing facilities, 300 feet of a dry cleaning facility that uses perchloroethylene (PCE), or 500 feet of a freeway or urban road with 100,000 or more vehicles per day (CARB 2005). The closest gas station to the project is located approximately 590 feet to the north, and the closest dry-cleaning facility to the project site is approximately 550 feet to the south. The closest road with 100,000 vehicles per day is Interstate (I-) 8, approximately 1,700 feet to the north. Therefore, future project residents would not be exposed to substantial concentrations of TACs. Associated impacts would be less than significant.

- d. The State of California Health and Safety Code Sections 41700 and 41705, and SDAPCD Rule 51, prohibit emissions from any source whatsoever in such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to the public health or damage to property.

According to the SCAQMD *CEQA Air Quality Handbook*, land uses associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting activities, refineries, landfills, dairies, and fiberglass molding operations (SCAQMD 1993). The project, consisting of a residential development, would not include any of these uses nor are there any of these land uses in the project vicinity.

Emissions from construction equipment, such as diesel exhaust, and VOCs from architectural coatings and paving activities may generate odors; however, these odors would be temporary, intermittent, and not expected to affect a substantial number of people. Additionally, such odors would be confined to the immediate vicinity of construction equipment. By the time such emissions reach any sensitive receptor sites, they would be diluted to well below any level of air quality concern. Furthermore, short-term construction-related odors are expected to cease upon the drying or hardening of the odor-producing materials. Long-term operation of the project would not be a substantial source of objectionable odors. Therefore, the project would not create objectionable odors affecting a substantial number of people. Impacts would be less than significant.

4. Biological Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	☒
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒
a. The project site is developed and currently includes a paved parking lot in the western portion of the site. The remainder of the site is vacant but previously contained a police station building, which was demolished in 2012. There are scattered mature trees that are remnants of the ornamental landscaping that was associated with the police station and sparse low-lying weedy vegetation within a portion of the gravel area of the project site. As identified in the La Mesa General Plan EIR Figure 4.3.1, <i>Vegetation</i> , the project site is mapped as Urban/Developed (AECOM 2012). As discussed in the EIR, this type of land is land that is permanently altered due to above ground construction. Limited vegetation consists of isolated patches of non-native ornamental landscaping that does not provide habitat suitable to support candidate, sensitive, or special status species. Therefore, no impact would occur in relation to this issue.				
b. Please refer to the response to item 4.a. The project site is a developed and disturbed area and does contain sensitive vegetation. As noted, there are remnants of the ornamental landscaping that was associated with the former police station and sparse weedy vegetation. There is no riparian habitat or other sensitive vegetation 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. No impact would occur in relation to this issue.				

- c. The project site is developed and disturbed and, as noted in item 4.b., does not contain sensitive vegetation or riparian habitat. No wetlands occur on or adjacent to the project site either. Thus, no impact would occur in relation to this issue.
- d. Wildlife corridors usually consist of natural habitat areas that connect wildlife populations. The project site is located in a developed area that lacks any of the features of a wildlife corridor and includes many hindrances, such as an established roadway network that preclude the area from being a corridor or migratory route. Therefore, no impact would occur in relation to this issue.
- e. Project construction would require the removal of four existing mature trees and some ornamental bushes within the site. The existing trees along the site perimeter would remain. The proposed project would not conflict with applicable goals, objectives, and policies within the General Plan Conservation and Sustainability Element or Recreation and Open Space Element, including Policy CS-1.1.3 (preserve existing trees where appropriate and require planting of new trees in conjunction with public and private developments). As noted, the existing street trees along the Allison and Date Avenue frontage, as well as trees along the eastern and southern site perimeters, would remain upon project construction. New trees and ornamental landscaping would be planted as part of the project landscape plan. New trees would be planted in accordance with the City's Tree Policy Manual. As discussed in items 4.a through 4.d, the project would not impact sensitive biological resources. Therefore, the proposed project would not conflict with local policies or ordinances protecting biological resources. No impact would occur in relation to this issue.
- f. The City of La Mesa Subarea Habitat Conservation Plan/Natural Community Conservation Plan (HCP/NCCP; City 1998) is a local habitat conservation plan prepared pursuant to the NCCP to supplement the San Diego Multiple Species Conservation Plan (MSCP) The MSCP is intended to provide for the protection and conservation of the region's sensitive plant and wildlife species habitat while continuing to allow appropriate levels of development and growth. As a planning tool, the MSCP protects the region's biodiversity while reducing conflicts between development interests and natural resources. The project site is located within the boundaries of the City of La Mesa Subarea HCP/NCCP, but not within or in the vicinity of areas designated as Multi-Habitat Planning Area, Core Biological Resource Areas and Linkages, or other preserve lands as identified in the Subarea HCP/NCCP. The project site is not within a preserve or core biological area of the MSCP or contains species protected by any other approved local, regional, or state HCP. Therefore, no impact would occur in relation to this issue.

5. Cultural Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☐	☐	☒
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☐	☒	☐

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
c. Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☒	☐
a. The project site is comprised of an asphalt parking lot and vacant developed/disturbed land. It previously contained a police station building that was removed in 2012. There are currently no buildings, structures, or foundations present within the project site. Therefore, the project would have no impact on built-environment historical resources.				
b. The project site contains a paved parking lot and vacant developed/disturbed land that was previously developed with a police station building that included a subterranean level. The proposed project would also include a partially subterranean parking garage. Due to the highly disturbed nature of the project site and the previous ground disturbance (including the subterranean level), it is unlikely that project construction activities would extend into previously undisturbed materials. Thus, the likelihood to encounter intact subsurface archaeological resources is low. However, there is still a possibility for buried, unknown archaeological resources to occur. As a condition of approval, a note shall be placed on the building plans stating that should any archeological (cultural) resources or human remains be discovered during construction-phase ground-disturbing activities, all work in the immediate vicinity must stop and the project applicant shall notify the City immediately. A qualified professional shall be retained to evaluate the finds and recommend appropriate action. For human remains, the applicant shall notify the County Coroner. For human remains determined to be of Native American origin, the procedures outlined in CEQA Section 15064.5 (d) and (e) shall be followed. The applicant shall ensure, to the satisfaction of the City and the Native American Heritage Foundation, if applicable, that appropriate measures are undertaken prior to resuming any project activities that may affect such resources. With the inclusion of this condition of approval and the required regulatory compliance, impacts to archaeological resources would be less than significant.				
c. Disturbance to human remains, including those interred outside of formal cemeteries is not anticipated given the generally disturbed nature of the project site and the extent of historic and modern development within the project area. If human remains are discovered, California Health and Safety Code Section 7050.5 states that further disturbance and activities shall cease in any area or nearby area suspected to overlie remains and the County Coroner contacted. Pursuant to Public Resources Code (PRC) Section 5097.98, if the Coroner recognizes the remains to be Native American, the Coroner shall notify the Native American Heritage Commission, who would then notify the Most Likely Descendent. If Native American remains are discovered, the remains shall be kept <i>in situ</i> , or in a secure location in close proximity to where they were found, and the analysis of the remains shall only occur on-site in the presence of a Native American monitor (see response to item 5.a.). Further provisions of PRC Section 5097.98 are to be followed as applicable. Based on compliance with existing codes, the proposed project would not be expected to disturb any human remains. This impact is less than significant.				

6. Energy

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐	☒

- a. As is typical of any construction, the project would temporarily consume energy for the operation of construction equipment and vehicles. During construction, standard methods of excavation and concrete pouring are planned. Construction activities do not include methods of construction which would result in inefficient or unnecessary use of energy resources. The project is designed to meet California Code of Regulations (CCR) Title 24 CALGreen mandatory green building standards. As such, the development includes a suite of design features that assist in meeting the required energy reduction standards including: dual-paned, energy efficient windows; electric appliances within residential dwellings; Energy Star rated (or similar level) appliances; roof-mounted solar thermal panels to preheat domestic water; drought-tolerant landscaping; water-efficient plumbing fixtures; pre-wiring for the future install of electric vehicle charging stations for use by residents and office staff; and use of low VOC paints, coatings, finishes, and materials. Thus, the project would have a less than significant impact in relation to this issue.
- b. Several levels of government have implemented regulatory programs in response to reducing greenhouse gas emissions (GHG) emissions, which consequently serve to increase energy efficiency. Several state agencies, including CARB, California Energy Commission, California Public Utilities Commission, CalRecycle, California Department of Transportation (Caltrans), and the Department of Water Resources have developed regulatory and incentive programs that promote energy efficiency. Many of the measures are generally beyond the ability of any future development to implement and are implemented at the utility provider or the manufacturer level.

Locally, the City of La Mesa adopted its Climate Action Plan (CAP) in March 2018, which provides the framework for reducing the City's GHG emissions and consequently improving energy efficiency. Often local energy conservation plans and goals, such as those in the City's CAP are devised based upon the anticipated land uses within a planning area as outlined in planning documents including a City's General Plan or Zoning Ordinance. The Project does not conflict with the General Plan or Zoning Ordinance land uses. The project is designed as a TOD, and as such the site is strategically located in the downtown village near the La Mesa Boulevard Trolley Station and local bus route stops. Therefore, the project would provide opportunities for residents to utilize other alternative transportation options, which could result in energy conservation.

The project does not conflict with any state or local plans for renewable energy efficiency. The project would employ standard methods of construction and does not propose to create

a project condition post-construction whereby increased energy demand would be created. Thus, the project would have no impact in relation to this issue.

7. Geology and Soils

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?	☐	☐	☐	☒
ii. Strong seismic ground shaking?	☐	☐	☒	☐
iii. Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv. Landslides?	☐	☐	☒	☐
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☒	☐
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☐	☒
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

Group Delta Consultants (GDC) conducted a Geotechnical Investigation for the project in October 2019. The results of this analysis are summarized herein. The Geotechnical Investigation can be referenced in its entirety as Appendix B of this IS/MND. The geotechnical engineering recommendations included in the Geotechnical Investigation are designed to meet the CBC standards, and have been incorporated into the project as design features.

- a.i. 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 pre-existing faults, which are zones of weakness. Sudden displacements are more damaging to structures because they are accompanied by

shaking. Under the Alquist-Priolo Earthquake Fault Zoning Act, the California State Geologist identifies areas in the State that are at risk from surface fault rupture. The Alquist-Priolo Act's main purpose is to prevent the construction of buildings used for human occupancy on the surface trace of active faults; that requires the State Geologist to establish regulatory zones, known as Alquist-Priolo Earthquake Fault Zones, around the surface traces of active faults and to issue appropriate maps that identify these zones. The project is not located within a designated Alquist-Priolo Earthquake Fault Zone. Thus, no impact would occur in relation to this issue.

- a.ii. The closest fault to the project site is the Rose Canyon Fault, which is approximately 10 miles west of the site. Like most of southern California, the project site is susceptible to strong seismic shaking during an earthquake and can therefore be subject to strong seismic ground motion. The project would comply with the seismic design parameters outlined in the California Building Code (CBC), which provide requirements for earthquake safety based on factors such as occupancy type, the types of soils on-site, and the probable strength of ground motion. Compliance with the CBC would include the incorporation of: (1) seismic safety features to minimize the potential for significant effects as a result of earthquakes; (2) proper building footings and foundations; and (3) construction of the building structure so that it would withstand the effects of strong ground shaking. In addition, the City's Building Department would review the building plans through building plan checks, issuance of a building permit, and inspection of the project during construction, which would ensure that all required CBC seismic safety measures are incorporated into the project. Compliance with the CBC (as encoded as Chapter 14.04.010, of the La Mesa Municipal Code) and the Building Department's review process, permit application, and inspection would result in less than significant impacts in relation to this issue.
- a.iii. Liquefaction is a soil phenomenon in which water-saturated soils lose strength when subject to the forces of intense and prolonged ground shaking. Liquefaction is more likely to occur in loose to moderately saturated soils with poor drainage, such as silty sands or sands and gravel containing impermeable sediments. The presence of a shallow groundwater table can also increase the susceptibility of liquefaction during seismic events. Borings conducted by GDC revealed that the groundwater table in the project vicinity is 20 to 30 feet below existing grades. Additionally, the project site is underlain by Stadium Conglomerate, which ranges from dense to very dense and compacted fill. Given the depth to groundwater and the density of the underlying geologic materials, the project site has a low susceptibility to liquefaction and impacts would be less than significant in relation to this issue.
- a.iv. A site reconnaissance and literature review conducted by GDC did not reveal any evidence of landslides or slope instability at the project site. This is further evidenced by the gentle slope of the project site from 535 feet above mean sea level (AMSL) in the northeast to 525 feet AMSL in the southwest. As noted, geotechnical engineering recommendations are included in the Geotechnical Investigation and have been incorporated into the project as design features. With the project design features, the project would not experience slope instability and impacts are less than significant in relation to this issue.
- b. Construction of the proposed project would involve a variety of heavy equipment associated with intensive earthwork, structural, and paving phases. Soil exposed by construction activities, such as excavation, could be subject to erosion if exposed to

heavy rain, winds, or other storm events. The project would be required to obtain an NPDES Construction General Permit and be required to submit a Notice of Intent with the RWQCB for the preparation of a Stormwater Pollution Prevention Program (SWPPP). Generally, a SWPPP demonstrates how water quality during and post-construction would be maintained in accordance with mandated objectives. Often this is achieved by employing best management practices (BMPs) (see Section 10, *Hydrology and Water Quality*). Many BMPs designed to protect water quality also serve to reduce soil erosion and loss of topsoil.

Specific BMPs may include the following:

- Preservation of existing vegetation within staging/parking areas where feasible.
- Covering stockpiled, excavated, and/or fill materials to reduce potential off-site sediment transport.
- Use of erosion control devices, such as straw wattles, mulch, mats, and/or geotextiles.
- Use of sediment controls to protect the site perimeter and prevent off-site sediment transport, including measures such as silt fencing, fiber rolls, gravel bags, temporary sediment basins, street sweeping, stabilized construction access points and sediment stockpiles, and use of properly fitted covers for sediment transport vehicles.
- Compliance with local dust control measures.
- Daily backfill, compaction, and/or covering of excavated pipeline trenches to minimize erosion potential.
- Paving of disturbed roadway areas as soon as feasible after completion of trenching.
- Regular inspection and maintenance of all erosion control and sediment catchment facilities to ensure proper function and effectiveness.

Prior to the issuance of a grading permit, the City requires that an applicant demonstrates proof of coverage under the NPDES Construction General Permit and a complete SWPPP. Moreover, as required by the City of La Mesa Grading Ordinance (No. 2002-2718), all grading plans shall include an erosion control plan designed to limit erosion of all disturbed portions of the property and to eliminate the transport of soil onto adjacent properties, or into streets, storm drains, or drainage ways.

With the implementation of required standard erosion control measures and storm water construction BMPs, construction-related erosion and sedimentation impacts would be less than significant. Additionally, once constructed, the project site would no longer include a large area of exposed soils that would contribute to erosion and sedimentation. Therefore, impacts related to substantial soil erosion or loss of top soils would be less than significant.

- c. As discussed in items a.iii. and a.iv. above, impacts associated with liquefaction and landslides would be less than significant. In relation to other potential geologic instability

hazards, the project incorporates the recommendations of the Geotechnical Investigation as project design features, and the project would be designed in accordance with the CBC, which includes measures to reduce geologic impacts. Further, the project site is in an area that is flat, with little topographic variation in the immediate affected area. Thus, the project would have less than significant impact in relation to this issue.

- d. Laboratory tests on the near surface soils by GDC indicated that the on-site soils have a low expansion potential. Moreover, adherence to the CBC and the City's Grading Ordinance would reduce hazards related to expansive soils. Specifically, the Grading Ordinance States, "The City Engineer shall not issue a grading permit in any case where the City Engineer finds that the work, as proposed by the applicant, will damage any private or public property, or interfere with any existing drainage course in a manner which may cause damage to any adjacent property, or create an unreasonable hazard to person or property". Thus, with the required adherence to the CBC and the Grading Ordinance, the project would have no impact in relation to this issue.
- e. The project does not involve the installation of septic tanks or alternative wastewater systems. Therefore, no impact would occur in relation to this issue.
- f. The disturbance area for the project is entirely within the previously disturbed area of the site. As noted in item 5.b, the former police station building included a subterranean level, and the proposed project would also include a partially subterranean parking garage. Due to the highly disturbed nature of the project site and the previous ground disturbance (including the subterranean level), it is unlikely that project construction activities would extend into previously undisturbed materials. Thus, the likelihood to encounter intact paleontological resources is low. However, based on the paleontological resource sensitivity of underlying formational materials, there is a possibility to encounter paleontological resources. The project site is underlain by fill material that extends to depths ranging between approximately 2 to 13.5 feet, and the Stadium Conglomerate formation occurs at depths greater than 2 to 13.5 feet (GDC 20190). Fill material exhibits zero potential for the occurrence of sensitive paleontological resources. The Stadium Conglomerate formation, however, exhibits a high potential for the occurrence of sensitive paleontological resources. Thus, ground disturbing activities associated with construction of the project have the potential to uncover paleontological resources. In the event that paleontological resources are encountered during construction, such resources could potentially be damaged or destroyed. Therefore, the implementation of the proposed project could potentially result in significant impacts to paleontological resources. Implementation of the proposed project could result in a potentially significant impact to unknown paleontological resources. Implementation of mitigation measure PAL-1 would reduce this impact to below a level of significance.

PAL-1 Paleontological Monitoring. Prior to construction, the project applicant shall retain a qualified paleontological monitor. The paleontological monitor shall attend pre-construction meeting(s) with the construction manager and shall be present during all initial cutting, grading, or excavation of previously undisturbed substratum. If a fossil is encountered, all operations in the area where the fossil was found shall be suspended immediately, the City shall be notified, and a qualified paleontologist shall be retained to evaluate the significance of the find; to salvage, record, clean, and curate significant fossil(s); and to document the find in accordance with current professional paleontological standards. Within 30 days of completion of ground-disturbing activities, either a letter signed by the

paleontological monitor stating that no fossils were found or, if fossils were found, a report prepared by the qualified paleontologist documenting the mitigation program shall be submitted to the City.

8. Greenhouse Gas Emissions

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

A Greenhouse Gas Emissions Technical Report was prepared for the project, which is included as Appendix C to this IS/MND (HELIX 2021b). The results and conclusions of this analysis are summarized in this section.

- a. Global climate change refers to changes in average climatic conditions on Earth, including temperature, wind patterns, precipitation, and storms. Global temperatures are moderated by atmospheric gases. These gases are commonly referred to as GHGs because they function like a greenhouse by letting sunlight in but preventing heat from escaping, thus warming the Earth's atmosphere. The GHGs defined under California's Assembly Bill 32 include carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF₆).

GHGs have long atmospheric lifetimes that range from one year to several thousand years. Long atmospheric lifetimes allow for GHG emissions to disperse around the globe. Because GHG emissions vary widely in the power of their climatic effects, climate scientists have established a unit called global warming potential (GWP). The GWP of a gas is a measure of both potency and lifespan in the atmosphere as compared to CO₂. For example, because methane and N₂O are approximately 25 and 298 times more powerful than CO₂, respectively, in their ability to trap heat in the atmosphere, they have GWPs of 25 and 298, respectively (CO₂ has a GWP of 1). CO₂e is a quantity that enables all GHG emissions to be considered as a group despite their varying GWP. The GWP of each GHG is multiplied by the prevalence of that gas to produce CO₂e.

To determine whether the project would result in emissions that may have a significant impact on the environment, the project's GHG emissions were compared to the GHG emissions efficiency threshold of 3.46 MT CO₂e per capita by the year 2035 selected as a target by the City for GHG reductions in the CAP (City of La Mesa 2018). This target was developed to meet the statewide GHG emissions reduction target of 40 percent below 1990 levels by 2030 and be on track to meet the 80 percent below 1990 levels by 2050 target in accordance with Senate Bill (SB) 32 and Executive Order (EO) S-3-05.

A 2035 target value between the 2030 and 2050 state reduction targets would require GHG reductions of 50 percent below 1990 levels. A 50 percent reduction below 1990 levels is equivalent to a 53 percent reduction below 2010 levels. A 53 percent reduction below La Mesa's 2010 baseline of 7.37 MT CO₂e per capita would be 3.46 MT CO₂e per capita (City of La Mesa 2018).

The project would generate GHG emissions during construction and operation of the project, as discussed below.

Construction Emissions

Project construction GHG emissions were estimated using the CalEEMod model. Details of phasing, selection of construction equipment, and other input parameters, including CalEEMod data, are included in Appendix C to this IS/MND.

Emissions of GHGs related to the construction of the project would be temporary. As shown in Table 4, *Construction GHG Emissions*, total GHG emissions associated with construction of the project are estimated at 838 MT CO₂e. To be conservative in accounting for all the project's GHG emissions, construction emissions are amortized (i.e., averaged) over the 30-year estimated life span of the project buildings and added to operational emissions. Averaged over 30 years, the proposed construction activities would contribute approximately 27.9 MT CO₂e emissions per year.

Table 4
CONSTRUCTION GHG EMISSIONS

Year/Activity	Emissions (MT CO₂e)
2022/Site Preparation, Grading and Excavation, and Podium Construction	253.9
2023/Podium Construction and Building Construction	416.8
2024 Building Construction and Architectural Coating	167.3
TOTAL¹	838.0
<i>Amortized Construction Emissions²</i>	<i>27.9</i>

Source: HELIX 2021b

¹ Totals may not sum due to rounding.

² Construction emissions are amortized over 30 years.

GHG = greenhouse gas; MT = metric tons; CO₂e = carbon dioxide equivalent

Operational Emissions

The project's operational GHG emissions were estimated using CalEEMod. The complete modeling output is included as Appendix C to this IS/MND. As shown in Table 5, *Operational GHG Emissions*, the project would result in approximately 1,096 MT CO₂e per year. For comparison with the City's 2035 GHG reduction target from the CAP, the project's operational emissions were divided by the project's estimated future population. Based on the SANDAG 2019 estimated rate of 2.40 persons per household in La Mesa, the project population would be 353 persons (SANDAG 2021a).

**Table 5
OPERATIONAL GHG EMISSIONS**

Emission Sources	2020 Emissions (MT CO₂e)
Area Sources	106.7
Energy Sources	274.6
Vehicular (Mobile) Sources	608.4
Solid Waste Sources	26.8
Water Sources	51.5
Subtotal¹	1,067.9
Construction (Annualized over 30 years)	27.9
TOTAL¹	1,095.8
Emissions per Capita²	3.10
CAP 2035 Target Emissions per Capita	3.46
Exceed Threshold?	No

Source: HELIX 2021b

¹ Totals may not sum due to rounding.

² Emission per capita is the project total emissions divided by the project population (1,067.9/353).
GHG = greenhouse gas; MT = metric tons; CO₂e = carbon dioxide equivalent

As shown in Table 5, the project's per capita emissions would be approximately 3.10 MT CO₂e per year, below the City's GHG emissions target of 3.46 MT CO₂e per capita by the year 2035. Therefore, the project would not generate GHG emissions that may have a significant impact on the environment, and the impact would be less than significant.

- b. There are numerous State plans, policies, and regulations adopted for the purpose of reducing GHG emissions. The principal overall State plan and policy is Assembly Bill (AB) 32, the California Global Warming Solutions Act of 2006. The quantitative goal of AB 32 is to reduce GHG emissions to 1990 levels by 2020. SB 32 would require further reductions of 40 percent below 1990 levels by 2030. Because the project's operational year is post-2020, the project aims to reach the quantitative goals set by SB 32. Statewide plans and regulations such as GHG emissions standards for vehicles (AB 1493), the LCFS, and regulations requiring an increasing fraction of electricity to be generated from renewable sources are being implemented at the statewide level; as such, compliance at the project level is not addressed. Therefore, the proposed project would not conflict with those plans and regulations.

The City's CAP describes the 2010 GHG emissions baseline and forecasted emissions for 2020 and 2035, and identifies achievable, measurable strategies and actions for the City to implement to reduce emissions to 15 percent below 2010 levels by 2020 and 53 percent below 2010 levels by 2035 (City of La Mesa 2018). These CAP reduction goals were designed to enable the City to meet the 2020 GHG reduction mandates of AB 32, the 2030

GHG reduction mandates SB 32, and to be on-track to meet the 2050 mandates of EO S-3-05 goal of GHG emissions 80 percent below 1990 levels by 2050.

The CAP contains reduction measures within the City's direct influence to achieve the City's 2020 and 2035 GHG reduction targets in five strategy areas: energy; transportation and land use; water; solid waste; and green infrastructure (urban forest). The project is approximately 500 feet southeast of the La Mesa Trolley Station and adjacent to MTS bus stops. Due the project's proposed high-density multi-family housing and proximity to a major transit stop, the project would be considered TOD. Therefore, the project would support the CAP Transportation and Land Use reduction measure T-4, Mixed-Use and Transit-Oriented Development. In addition, the project's conformance to the 2019 Title 24 Part 6 building energy efficiency code and Part 11 CALGreen code would ensure the project is consistent with the CAP building energy, water use, and solid waste diversion strategies and measures; and the project would be consistent with the green infrastructure strategies and measures by implementing the 2019 CALGreen and City standards for public right of way and shade trees on the project's frontage with Allison Avenue and Date Avenue. As discussed in Issue 1, the project's GHG emissions would not exceed the City's CAP 2035 GHG reduction target. Therefore, the project would not conflict with or obstruct the implementation of the City's CAP.

The project has a land use designation of Downtown Commercial, and the project's proposed apartments are a permitted use consistent with the General Plan land use designation. Therefore, the project would not result in population growth beyond the levels assumed for the region and the project would not conflict with any population projections for the region used to develop the SANDAG's Regional Plan. The transportation sector is the largest source of GHG emissions in the state and in the San Diego region. A project's GHG emissions from cars and light trucks are directly correlated to the project's VMT. A reduction of VMT through the implementation of TOD projects is a key component of SANDAG's Regional Plan to mitigate the adverse effects of traffic congestion and reduce GHGs (SANDAG 2015). The TIA analyzed the project's VMT and concluded VMT impacts would be less than significant (LLG 2021). Therefore, the project would not conflict with or obstruct the implementation of the SANDAG's Regional Plan. Overall, the project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs, and the impacts would be less than significant.

9. Hazards and Hazardous Materials

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☒	☐
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

- a. Materials and waste are generally considered hazardous if they are poisonous (toxicity), can be ignited by open flame (ignitability), corrode other materials (corrosivity), or react violently, explode, or generate vapors when mixed with water (reactivity). The term “hazardous material” is defined in the State Health and Safety Code (Chapter 6.95, Section 25501[o]) as any material that, because of quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment. Hazardous waste is defined as any hazardous material that is abandoned, discarded, or recycled, as defined in the State Health and Safety Code (Chapter 6.95, Section 25125). The transportation, use, and disposal of hazardous materials, as well as the potential releases of hazardous materials to the environment, are closely regulated through many state and federal laws.

During the project construction period, hazardous substances used to maintain and operate construction equipment (such as fuel, lubricants, adhesives, and solvents) would be present. The use of these materials could potentially result in significant impacts through accidental discharge associated with the use and storage of hazardous materials. The transport, use, and disposal of hazardous materials and/or wastes would be conducted in accordance with applicable federal and state laws. In addition, implementation of the proposed project would require conformance with the NPDES Construction General Permit. Specifically, this would entail the implementation of a SWPPP to address the use of hazardous materials and the potential discharge of contaminants including construction-related hazardous wastes through the installation of appropriate BMPs. While specific BMPs would be determined during the SWPPP process, the suite of BMPs would include standard industry measures and guidelines contained in the NPDES Construction Permit text and Stormwater Best Management Practices Construction Handbook (California Stormwater Quality Association

[CASQA] 2019). Based on the implementation of appropriate BMPs, hazardous material impacts related to construction activities would be less than significant.

Operation of the proposed project would include the storage and use of household hazardous materials and wastes. Typical household hazardous materials associated with the residential land uses could include cleaning products, paints, solvents, adhesives, other chemical materials used in building maintenance and interior improvements, automotive lubricants, small combustion engine fuels and lubricants, expired pharmaceuticals, mercury thermometers, sharp or used needles, and electronic wastes from household and car batteries. No special permits would be required for such limited use or disposal of common agents and products. Therefore, operation of the project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Impacts would be less than significant in relation to this issue.

- b. As discussed in response to item 9.a above, any transport, use, or disposal of hazardous materials would be limited to typical equipment used during construction or routine maintenance, and the operation of which is subject to regulations. Post-construction, the project does not include land uses or improvements that would involve any transport, use, or disposal of hazardous materials, nor would they emit hazardous emissions, other than common household hazardous materials and chemicals and products for routine maintenance. 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 are less than significant in relation to this issue.
- c. There are no schools located within one-quarter mile of the project site. The nearest school is Lutheran Catholic School, approximately 0.30 miles west of the project site. The project would introduce residential land uses to the site. These land uses do not generate hazardous emissions or involve the handling of acutely hazardous materials, substances, or wastes. As noted in the response to item 9.a, the residential land uses would involve the regular handling of minor quantities of common household chemical agents and related wastes; however, these types of wastes are typical and do not represent a hazardous materials or waste impact. Thus, a less than significant impact would occur in relation to this issue.
- d. A Phase I Environmental Site Assessment (ESA) was completed by Essel Environmental Engineering and Consulting (Essel) to evaluate any potentially hazardous conditions at the project site that could impact the project, public, or environment (Essel 2019). The Phase I ESA is contained in Appendix D to the IS/MND. As stated by the American Society for Testing Materials (ASTM) Standard Practice for ESAs, the purpose of the Phase I ESA is to identify recognized environmental conditions (RECs), which are defined as “the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to any release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment. De minimis conditions are not recognized environmental conditions.” There are three categories of RECs: existing RECs (as defined above), Historical RECs (HRECs), or Controlled RECs (CRECs). An HREC is defined as “a past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls.” An HREC is an environmental condition that was recognized in the

past but may or may not still be recognized as a current environmental condition. A CREC is defined as a “recognized environmental condition resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority, with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls.” A CREC is an active environmental concern because while the hazardous substances have been corrected to meet certain regulatory levels, the contaminants still remain and have the potential to be above regulatory levels for some types of development.

The Phase I ESA included a site reconnaissance, a historical records review, a regulatory records review, the review of user provided information, and interviews with persons knowledgeable with the site (past site owners and occupants, government officials, etc.). The Phase I ESA did not identify any evidence of a REC in connection with the project site related to either current or historical on-site activities or to current or historical activities on adjacent and nearby properties.

The Phase I ESA notes that given that the project would require excavation and the disposal of soils off-site, that as is required with soil removal projects, the on-site soils would be tested prior to hauling and relocation. However, this is standard practice in accordance with regulatory requirements and is not an indicator of the presence of a hazard.

Government Code 65962.5 stipulates that the Department of Toxic Substances Control (DTSC), the Department of Health Services (DHS), the State Water Resources Control Board (SWRCB), and any local enforcement agency, as designated by Section 18051, Title 14 of the CCR, identify and update annually a list of sites that have been reported to have certain types of contamination.

Essel reviewed federal and state regulatory agency database information, provided by Environmental Data Resources, Inc. (EDR), concerning activities that may be of environmental concern at and in the vicinity of the project site. The database search was conducted using publicly available regulatory records. Specifically, the EDR report includes properties and facilities that are contained in regulatory-agency environmental databases and are The EDR report contains a table that summarizes the findings of the database report, a copy of which is included in Appendix D of this IS/MND

The project site is listed on the Facility and Manifest Database (HAZNET) maintained by the California Environmental Protection Agency (Cal EPA), NPDES, and the California Integrated Water Quality System Database (CIWQS) maintained by the State Water Resources Control Board. The HAZNET database records annual hazardous waste shipments as required by Resource Conservation and Recovery Act. According to the Phase I ESA, the listing is related to the realignment of a pipeline, a portion of which occurred within the project site and there are no indicators that any materials were misused. The NPDES and CIWQS listings are also for the pipeline realignment. The NPDES listing indicates that an NPDES permit was required for pipeline realignment, which would be standard for such a construction project. Additionally, all businesses that use and dispose of hazardous materials are entered into the CIWQS database to track and manage permits, inspections, violations, and enforcement actions. Given the nature of the pipeline realignment project, it is not unusual for the site to be listed on these two databases. It is noted that the project site is not listed on any other environmental regulatory databases that would indicate a hazardous materials or waste threat. In addition, The EDR report identifies 41 listings for facilities that are located within a one-eighth mile radius of the project site.

Four listings are included on the EDR Historic Cleaner database, seven on the EDR Historical Auto database, and the remaining 30 entries are included on various regulatory-agency environmental databases. A review of the listings determined that none of the listed surrounding properties were a REC based on use, status, and location relative to the inferred predominant south to southeast direction of groundwater flow. Therefore, there would be a less than significant impact in relation to the site being listed on a database compiled pursuant to Government Code 65962.5.

- e. The project area is located approximately five miles southwest of Gillespie Field Airport, approximately eight miles southeast of the Montgomery Field Airport, and approximately nine miles east of San Diego International Airport. The project site is not located within the Airport Influence Area or within any safety zone or noise contour of these airports, as defined in their Airport Land Use Compatibility Plans (San Diego County Regional Airport Authority 2014, 2010a, and 2010b). Therefore, no impact would occur in relation to this issue.
- f. The project may require that traffic would at times be re-directed during construction. Heavy construction vehicles could potentially affect emergency response in the area or emergency evacuation procedures in the event of an emergency (e.g., vehicles traveling behind the slow-moving truck). However, such delays would be brief and infrequent. A traffic control plan would be required to be prepared and approved by the City Engineer. This plan would include the appropriate measures to assure that emergency access and response procedures would not be hindered by the project. Once operational, the project is required to adhere to the CBC, as encoded in the City's Municipal Code and the California Fire Code, both of which provide design standards to prevent the interference with emergency response plans. Thus, impacts related to emergency evacuation and the implementation of an emergency response plan would be less than significant in relation to this issue.
- g. The California Department of Forestry and Fire Protection (CALFIRE) classifies lands in accordance with whether a very high fire hazard is present so that public officials are able to identify measures that will retard the rate of fire spread and reduce the intensity of uncontrolled fire through vegetation management and building standards. The designation of being within a very high or high fire severity hazard zone is based upon a combination of fuels, terrain, weather, and other relevant factors. According to the County of San Diego online Wildfire Hazard Map, the project site is in an area that is not located in a very high fire hazard severity zone; thus, no impact would occur in relation to this issue (County of San Diego 2021).

10. Hydrology and Water Quality

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i. result in a substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	☐	☐	☒	☐
iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
iv. impede or redirect flood flows?	☐	☐	☒	☐
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

A drainage study (KPFF 2021a) and stormwater quality management plan (SWQMP; KPFF 2021b) were prepared for the project, which is included as Appendices E and F to this IS/MND. The results and conclusions of this analysis are summarized in this section.

- a. The project includes the construction of a 145,735-SF residential structure and associated infrastructure. As such, the proposed project would change the site through grading and by increasing impervious surfaces that would alter the hydrological patterns of the site and could introduce new sources of water pollutants in site runoff. There is the potential for water pollutants to be generated in the short-term during construction activities and in the long term due to the permanent changes to the site. Construction-related pollutants might include loose soils, liquid and solid construction materials and wastes, and accidental spills of concrete, fuels, and other materials. As an urban development, the proposed project would add typical, non-point-source pollutants to stormwater runoff, primarily due to runoff from impervious surfaces where a variety of pollutants can collect over time, such as roofs, the podium structure, balconies, and other paved surfaces. Landscaped areas can also generate water pollutants such as fertilizers and weed control agents, as well as green waste from landscape maintenance cuttings. Several measures to protect water quality and limit discharges are directed and implemented, through both the preparation of various plans and adherence to established programs. As discussed below, the project would be required to demonstrate compliance with such plans and programs.

La Mesa is within the jurisdiction of the San Diego RWQCB, which is tasked with protecting the region's water quality objectives that meet the standards set forth in Section 303 of the federal Clean Water Act (CWA) as well as the state's Porter-Cologne Water Quality Act. The San Diego RWQCB designates beneficial uses of surface water and groundwater, sets qualitative and quantitative water quality objectives that must be met to protect designated beneficial uses, and develops implementation programs to protect the regional water resources through its Water Quality Control Plan for the San Diego Basin (the Basin Plan).

Additionally, the project would be subject to the NPDES program, which regulates point source and non-point source pollutant discharges to surface waters. Municipalities are required to obtain permits for the water pollution generated by stormwater in their jurisdictions. These permits are known as municipal separate storm sewer system (MS4) permits. Because the proposed project's storm water runoff would be discharged into the local municipal storm drain system, the project is required to demonstrate that it would be consistent with the standards established in the MS4 permit as encoded in Chapter 7.18 of the City of La Mesa Municipal Code, Storm Water Management and Discharge Control Program.

The project would adhere to the NPDES Construction General Permit during construction, which includes BMPs that serve to protect groundwater quality. A SWPPP would also be prepared in compliance with the Construction General Permit, which would identify erosion control and sediment control BMPs that would be implemented to minimize the occurrence of soil erosion or loss of topsoil. Such BMPs may include desilting basins or other temporary drainage or control measures, or both, as may be necessary to control construction-related pollutants. Project specific BMPs would be outlined in the SWPPP. A grading permit for the project is not issued until the SWPPP has been submitted to and approved by the City.

Once operational, a series of project design features, including roof and podium drains, pretreatment unit, cistern (a concrete module for storm water storage), biofiltration system, and overflow and curb drains would collectively capture and treat runoff. Therefore, impacts related to water quality would be less than significant.

Additionally, the project is a Priority Development Project (PDP) and, therefore, a final SWQMP would be prepared. The PDP SWQMP includes construction and post-construction BMPs in compliance with the City and San Diego RWQCB regulations such as source control, and hydromodification designs. Implementation of these BMPs under the PDP SWQMP would preclude any potential violations of applicable standards and discharge violations.

Based on the analysis above, the project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. Impacts would be less than significant in relation to this issue.

- b. The project does not include any groundwater extraction wells and all water demand would be met through piped connections to the municipal water system that is serviced by the Helix Water District (District). According to the District's 2020 Urban Water Management Plan Update (UWMP), less than one percent of the District's water supply comes from groundwater. Of that one percent, that supply comes from a single well that extracts from the San Diego River Valley Basin (Basin). There is no sustainable groundwater management act for the Basin; however, the Sustainable Groundwater Management Act of 2014 requires the Department of Water Resources to classify all basins in relation to the

threat of overdraft (high, medium, and low priority). The Basin has been designated as a low priority with no restrictions on pumping (District 2021).

The project would result in an increase in impervious surfaces at the site, which would decrease the availability of water to permeate below ground and recharge. However, as noted above, the District does not rely on groundwater recharge to meet its demand for water. Further, given that the Basin is designated as low priority, the decrease in any water recharge related to the increase in impervious surfaces would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the Basin. Impacts are less than significant in relation to this issue.

- c.i. There are no on-site drainage courses and no nearby off-site drainage courses that would be altered by the project. The nearest drainage courses are Alvarado Creek, approximately 0.7 mile north/northwest of the project site, and Spring Creek is approximately one mile southeast of the project site. However, the project would alter the drainage patterns during both construction during earth moving activities and operation through the introduction of structures and new impervious surfaces. Specifically, storm water currently sheet flows across the site and is either routed to a v-ditch gutter that routes the flow to an on-site catch basin located at the southwest corner of the site or directly to a catch basin. Flow entering this catch basin is then routed to another catch basin located on Date Avenue. There appears no off-site runoff is conveyed through the site. Once the project is constructed, the pervious features would involve biofiltration landscape planters surrounding the outside perimeter of the building and in the podium deck of the courtyard. Roof and podium drains would capture and convey storm water to the proposed cistern. The captured runoff will then be discharged to the proposed biofiltration system and then into the public storm drain system via curb drains.

As discussed in item 7.b, the project would be required to adhere to the NPDES Construction General Permit, which would require the preparation of a SWPPP that would outline construction-related BMPs that would reduce the amount of siltation and erosion during project construction.

Once developed, the project would alter the on-site drainage patterns through the introduction of new and intensified land uses that would be a combination of both impervious surfaces and landscaped and semi-permeable surfaces. According to the Drainage Study (KPFF 2021a), currently 55 percent of the project site is impervious and under project conditions, 91 percent of the site would be impervious (due to the structure surfaces). Further, the site's existing topography would be altered due to the excavation for the partially subterranean parking structure. Currently, storm water sheet flows across the site and is conveyed either through a gutter or directly to a catch basin in the southwest portion of the site. The post project storm drain system consists of roof and podium drains which would capture storm water that would enter a pretreatment unit and be conveyed to a cistern. The captured runoff would then be discharged to a biofiltration system and discharged to the public storm drain system via a system of catch basins and overflow and curb drains. Thus, the storm drain system would accommodate on-site runoff and would not result in the potential for erosion or sedimentation to occur.

In addition, the project would be required to adhere to the City's Storm Water Ordinance that is codified in the City's Municipal Code Chapter 7.18. In part, this Ordinance would require that the project comply with the City's Standard Urban Storm Water Mitigation Plan

(SUSMP), that provides operational storm water discharge and conveyance regulations. The SUSMP contains BMPs that serve two overarching goals: (1) to provide effective means to prohibit non storm water discharges; and (2) reduce the discharge of pollutants from storm water conveyance systems to the maximum extent practicable during construction and throughout the use of a developed site. Like the BMPs contained within the Construction General Permit, while these BMPs are designed with the intent of preserving water quality, they serve a dual purpose of also reducing the amount of erosion and siltation that occurs.

Therefore, given that the site would include the installation of a proposed storm drain system to capture and convey on-site runoff to the municipal system, the project would not result in substantial erosion or siltation on- or off-site and project impacts would be less than significant in relation to this issue.

c.ii. Implementation of the project would change the condition of the site from an asphalt and gravel vacant lot to a developed residential structure, with a combination of impervious surfaces and landscaped conditions, which would increase the rate and amount of site runoff by approximately 37 percent during a 10-year, 50-year, or 100-year storm event. As discussed above in item 10 c.i., the project would include a cistern for storm water storage. From the cistern, storm water would be released into the storm water conveyance system that ultimately discharges into the City's municipal storm water system. Overflow drains are also included in the site design that would intercept runoff that could not be accepted in the City system in large events. This proposed storm drain system would adequately collect, convey, and discharge on-site runoff and would not result in flooding of the site or surrounding properties during storm events. Therefore, the project would have a less than significant impact in relation to this issue.

c.iii. As discussed in item 10 c.ii, project development would increase the rate and amount of on-site runoff. KPFF calculated the peak storm runoff conditions for the 10-year, 50-year, and 100-year storm event. For all three, the post-project conditions would result in an approximately 37-percent increase in peak runoff flows. The project would include storm drain infrastructure designed to capture, store, and release runoff at rates that are either equal to or less than the current site conditions. Additionally, captured runoff would enter a pretreatment unit and the project's biofiltration system. Further, the project is required to incorporate both construction and operational BMPs that reduce pollutants. The project design also includes pervious features such as biofiltration landscape planters surrounding the outside perimeter of the housing structure and in the podium deck of the courtyard.

Therefore, through a combination of the construction and operational BMPs and the project design features, the project would have a less than significant impact in relation to this issue.

c.iv. The Federal Emergency Management Agency (FEMA) online Flood Insurance Rate Maps designate the project site as in an area of minimal flood hazard and is not in a mapped floodplain or flood hazard zone (FEMA 2021). Thus, while the project would alter the drainage patterns on the project site, it would not impede or redirect flood flows. Therefore, the project would have a less than significant impact in relation to this issue.

d. As discussed in item 10. c.iv., the project site is in an area of minimal flood hazard and is not in a mapped floodplain or flood hazard zone (FEMA 2021). An event associated with a tsunami would occur as a result of an oceanic disturbance, likewise, a seiche event would occur if there was a disturbance to an inland body of water. The project site is located

approximately 11 miles from the Pacific Ocean and two miles from Lake Murray. Therefore, given distance and topography, it is unlikely that the project site would experience inundation from either a tsunami or seiche. Thus, no impact would occur in relation to this issue.

- e. The project site is located within the regulatory boundaries of the San Diego RWQCB. The San Diego RWQCB is responsible for the adoption and implementation of water quality control plans, issuance of discharge permits, and performs other functions in relation to regulating the region's water quality. Project-related activities would be required to comply with the RWQCB Basin Plan. Adherence would be achieved through the implementation of a SWPPP, an erosion control plan, and by implementing BMPs during construction, thus ensuring the project would not conflict with or obstruct the RWQCB Basin Plan.

In relation to sustainable groundwater management, please see item 7.b. In addition, the project site is located within the larger Basin that is comprised of four contiguous sub-basins. The Basin has multiple users, is not adjudicated, and currently does not have an overall groundwater basin management plan. To comply with the Sustainable Groundwater Management Act and the California Statewide Groundwater Elevation Monitoring Program, in 2015, several local jurisdictions and water agencies formed a cooperative to monitor groundwater. Currently, the Basin is not exhibiting signs of overdraft or being at risk of overdraft. Impacts are less than significant in relation to this issue.

11. Land Use and Planning

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Physically divide an established community?	☐	☐	☐	☒
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☒	☐	☐

- a. The physical division of an established community typically refers to the construction of a linear feature, such as an interstate highway or railroad tracks, or the removal of a means of access, such as a local road or bridge that would impact mobility within an existing community or between a community and outlying area.

The project site is in an urban and developed area that includes City Hall and other civic uses such as the library, post office, and fire and police stations. The project site is also close to transit facilities, including the La Mesa Boulevard Trolley Station and local bus route stops. There are a variety of commercial and retail uses within proximity of the site. Rather than divide a community, the project would introduce housing in an area that is accessible to services and transportation and is intended to reinforce the pedestrian-oriented civic and downtown commercial district by promoting connectivity and walkability through design, such as street landscaping and lighting, pedestrian plazas, and location. No new major supporting infrastructure facilities would need to be constructed and extended to the project site that could result in a physical disruption to an established land

use or the local pattern of development. Therefore, the project would not physically divide the community and there would be no impact in relation to this issue.

- b. The project has a land use designation of Downtown Commercial and is zoned Civic Center. The project would rezone the site to Downtown Commercial to be consistent with the General Plan land use designation (see Figure DG-6 of the Downtown Village Specific Plan). Apartments are a permitted use consistent with the General Plan land use designation and the proposed Downtown Commercial zoning designation. City approval of a zone change is required prior to development to evaluate that the proposed zoning would be compatible with the surrounding land uses. This zone change would bring consistency between the existing land use designation and zoning and assist in achieving the vision of the City's General Plan. Additionally, the City's Design Review Board would review the proposed project in relation to the building height and bulk, parking, access and circulation, architectural style, public amenity spaces, lighting, landscaping, etc., to determine if the project implements the intent of the Downtown Specific Plan and the General Plan Land Use Element land use designation.

As discussed in this IS/MND, the project does not conflict with any policies regarding scenic resources and would be consistent with the General Plan Land Use and Urban Design Element. The 1.23-acre site does not contain any open space or conservation resources that may be subject to goals and policies of the City's General Plan Conservation and Sustainability Element, is not subject to an HCP or other conservation plans. Further, the project site does not contain any historic or known archaeological resources, and there are no goals or policies in the City's General Plan Historic Preservation Element that are pertinent to the project. The proposed project would be adequately served by existing public services, and would require compliance with the City's building and fire codes, and with the seismic regulations within the CBC. Consequently, no inconsistencies with the City's Public Services and Facilities, Safety, or Health and Wellness Elements are anticipated because of project implementation. As discussed in item 17.a., the project is consistent with the City's General Plan Circulation Element.

The goal of the Noise Element of the La Mesa General Plan (City of La Mesa 2013) is to minimize the impact of noise on the community by identifying existing and potential noise sources and providing the policies and standards needed to keep noise from reducing the quality of life in La Mesa. The General Plan Noise Element establishes guidelines to evaluate the compatibility of land uses and noise exposure levels. Table 6, *Land Use/Noise Compatibility Guidelines*, summarizes the City's exterior land use-noise compatibility guidelines. Shading in this table represents the maximum noise exposure level considered compatible for each land use category. The goal for maximum outdoor noise levels in commercial areas is 70 CNEL. This level is intended to guide the design and location of future development and serve as a target for the reduction of noise in existing development.

Table 6
EXTERIOR LAND USE/NOISE COMPATIBILITY GUIDELINES

Land Use Category	55*	60*	65*	70*	75*
Residential – Low Density Single Family, Duplex, and Mobile homes					
Residential – Multiple Family					
Transient Lodging – Motels, Hotels					
Schools, Libraries, Churches, Hospitals, and Nursing Homes					
Auditoriums, Concert Halls, Amphitheaters					
Sports Arena, Outdoor Spectator Sports					
Playgrounds, Neighborhood Parks					
Golf Courses, Riding Stables, Water Recreation, Cemeteries					
Offices Buildings, Business, Commercial, and Professional					
Industrial, Manufacturing, Utilities, Agriculture					

Source: City 2013

Notes: Shading represents the maximum noise exposure level considered normally acceptable for each land use category.

* = Annual CNEL (dBA)

As shown in Table 6, future land uses would be compliant with the City General Plan Noise Element if the project's residential exterior use areas are exposed to noise levels below 65 CNEL. Additionally, the Noise Element establishes an interior noise level threshold of 45 CNEL. A Noise and Vibration Technical Report was prepared for the project, which is included as Appendix G to this IS/MND (HELIX 2021c). This report includes a land use–noise compatibility analysis; results and conclusions of this analysis are summarized below.

Exterior Noise Levels

Future on-site residential land uses would be exposed to noise from vehicular traffic and light rail traffic along the Trolley line adjacent to the project site. The noise levels associated with vehicular and rail traffic were modeled at the project site using CadnaA. Impacts related to exterior noise would be significant if future residential exterior use areas intended for frequent outdoor use are exposed to noise levels in excess of the 65 CNEL limit set forth in the City General Plan Noise Element. The project's residential units include outward-facing balconies, however these are not considered areas intended for frequent outdoor use. The project's ground-level common exterior use areas are located in a south-facing east courtyard and within an interior west courtyard. The skydeck and lounge exterior use areas are located at the northwestern corner of the project's fourth floor.

Noise modeling indicated that noise levels at the project's skydeck and lounge exterior would be approximately 64.4 CNEL. Thus, since the noise levels at the common exterior use areas would not exceed 65 CNEL, impacts would be less than significant, and no mitigation is required.

Interior Noise Levels

Traditional architectural materials are conservatively estimated to attenuate noise levels by 15 CNEL; therefore, if exterior noise levels at building façades exceed 60 CNEL, interior noise levels may exceed the 45 CNEL limit set forth in the City General Plan Noise Element for residential uses. Modeled noise levels would exceed 60 CNEL for those units along the

northern, eastern, and western façades. Additionally, noise levels exceed 60 CNEL along the project's southern façade, east of the east courtyard.

Using modeled exterior façade noise levels, an exterior-to-interior noise analysis was conducted to calculate expected interior noise levels to determine if they would comply with the 45 CNEL standard. The information in this interior noise analysis includes wall heights/lengths, room volumes, window/door tables typical for a standard building plan, as well as information on any other openings in the building shell for the habitable residential rooms. The analysis provides information for the rooms with the highest potential interior noise and extends these requirements to other similar rooms.

The highest noise levels were modeled to occur at the project's eastern-facing façade, where noise levels exceed 65 CNEL. This analysis modeled a typical A Unit plan living and bedroom area. The proposed floor plan includes a bedroom with a window and wall exposed to vehicular traffic and rail noise and a living room with a balcony wall and door. The room was analyzed with the conservative noise condition of 67.8 CNEL. The room specifications used in this analysis are based on current floor plans provided by the project applicant.

Table 7, *Exterior-to-Interior Noise Levels*, displays the Sound Transmission Class (STC) ratings necessary to ensure interior noise levels for the proposed project are consistent with the City's interior 45 CNEL limit. Detailed modeling results can be found in Appendix G to the IS/MND.

Table 7
EXTERIOR-TO-INTERIOR NOISE LEVELS

Specification	Bedroom
Minimum exterior wall requirement	STC 46
Wall construction	Standard 0.875-inch Stucco over 0.5-inch Shearwall on 2x6 Studs with 0.625-inch Type "X" Drywall
Minimum window requirement	STC 28
Window construction	Dual Glazing Window Thickness 0.125-inch and 0.5-inch Air Gap
Exterior Noise	67.8 CNEL
Interior Noise	35.0 CNEL (windows closed)
Above 45 CNEL interior noise standard?	No
Specification	Living Room
Minimum exterior wall requirement	STC 46
Wall construction	Standard 0.875-inch Stucco over 0.5-inch Shearwall on 2x6 Studs with 0.625-inch Type "X" Drywall
Minimum window requirement	STC 28
Window construction	Dual Glazing Window Thickness 0.125-inch and 0.5-inch Air Gap
Exterior Noise	67.8 CNEL
Interior Noise	31.6 CNEL (windows closed)
Above 45 CNEL interior noise standard?	No

Source: HELIX 2020c

STC = Sound Transmission Class; CNEL = Community Noise Equivalent Level

Through incorporation of the building materials described above, all rooms would comply with the relevant interior noise standards of 45 CNEL for habitable areas. Appropriate means of air circulation and provision of fresh air would be present to allow windows to remain closed for extended intervals of time so that acceptable levels of noise can be maintained on the interior. The building design would include a mechanical ventilation system that would meet the criteria of the International Building Code (Chapter 12, §1203.3 of the 2016 California Building Code) to ensure that windows would be able to remain permanently closed. With incorporation of mitigation measure LU-1 below, noise levels would be reduced to acceptable levels per the City's General Plan Noise Element.

LU-1 Building Materials. Interior noise levels shall not exceed the City's General Plan interior noise standard of 45 CNEL for habitable areas of project residences. The following specifications, or like-kind to achieve the required noise control, shall be used in the construction of all habitable rooms along the project's external-facing northern façade, eastern façade, western façade, and southern façade east of the east courtyard:

- Exterior wall requirement of STC 46 including standard 0.875-inch stucco over 0.5-inch shearwall on 2-inch x 6-inch studs with 0.625-inch Type "X" Drywall.
- Minimum window requirement of STC 28 including windows with dual glazing, window thickness 0.125-inch, and 0.5-inch air gap.
- Appropriate means of air circulation and provision of fresh air must be present to allow windows to remain closed for extended intervals of time so that acceptable levels of noise can be maintained on the interior.
- The building design would include a mechanical ventilation system that would meet the criteria of the International Building Code (Chapter 12, §1203.3 of the 2016 California Building Code) to ensure that windows would be able to remain permanently closed.

12. Mineral Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state?	☐	☐	☐	☒
b. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☐	☒
a. Mineral resources are commonly defined as a concentration or occurrence of natural, solid, inorganic, or fossilized organic material in or on the earth's crust in such form and quantity and of such a grade or quality that it has reasonable prospects for economic extraction.				

Mineral resources can be categorized into three classes: fuel, metallic, and non-metallic. Fuel resources comprise coal, oil, and natural gas. Metals include such resources as gold, silver, iron, and copper. Lastly, non-metal resources include industrial minerals and construction aggregate. Industrial minerals include boron compounds, rare-earth elements, clays, limestone, gypsum, salt, and dimension stone. Construction aggregate includes sand and gravel, and crushed stone.

The Surface Mining and Reclamation Act of 1975 (SMARA) is the primary regulator of surface mining in the state. The act requires the state geologist (California Geological Survey) to identify all mineral deposits in the state and to classify them based on their significance. SMARA defines a mineral deposit as a naturally occurring concentration of minerals in amounts or arrangement that under certain conditions may constitute a mineral resource. The concentration may be of value for its chemical or physical characteristics. The classification of these mineral resources is a joint effort of the state and local governments. It is based on geologic factors and requires that the State Geologist classify the mineral resources area as one of the four Mineral Resource Zones (MRZs), Scientific Resource Zones (SZs), or Identified Resource Areas (IRAs), described below:

- MRZ-1: A Mineral Resource Zone where adequate information indicates that no significant mineral deposits are present or likely to be present.
- MRZ-2: A Mineral Resource Zone where adequate information indicates that significant mineral deposits are present, or a likelihood of their presence and development should be controlled.
- MRZ-3: A Mineral Resource Zone where mineral resource significance is undetermined.
- MRZ-4: A Mineral Resource Zone where there is insufficient data to assign any other MRZ designation.
- SZ Areas: Containing unique or rare occurrences of rocks, minerals, or fossils that are of outstanding scientific significance shall be classified in this zone.
- IRA Areas: County or State Division of Mines and Geology Identified Areas where adequate production and information indicate that significant minerals are present.

The California Geological Survey has designated the project site and surrounding area as MRZ-2 (Department of Conservation 2021). However, the La Mesa General Plan Conservation and Open Space Element states that the City does not have any mineral resources (City 2012). The entire project footprint is within an area that has been developed. Additionally, the project site is not being used for mineral resource extraction, and mineral resource extraction would be an incompatible use with the site's current and proposed zoning and adjacent civic, commercial/retail, and residential land uses. Thus, no impact would occur in relation to this issue.

- b. Please refer to response to item 12.a above. No impact would occur in relation to this issue.

13. Noise

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b. Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☒	☐

A Noise and Vibration Technical Report was prepared for the project, which is included as Appendix G to this IS/MND (HELIX 2021c). The results and conclusions of this analysis are summarized in this section.

- a. The project would result in an increase in noise during project construction and operation, as discussed below. All noise level or sound level values presented herein are expressed in terms of decibels (dB), with A-weighting (dBA) to approximate the hearing sensitivity of humans. Time-averaged noise levels are expressed by the symbol L_{EQ} , with a specified duration. The Community Noise Equivalent Level (CNEL) is a 24-hour average, where noise levels during the evening hours of 7:00 p.m. to 10:00 p.m. have an added 5 dBA weighting, and noise levels during the nighttime hours of 10:00 p.m. to 7:00 a.m. have an added 10 dBA weighting. All railroad vibration levels in this report are referenced to 1×10^{-6} inches/second with the notation VdB.

Operational On-site Noise

Per the City Noise Ordinance, impacts would be significant if the project would generate noise levels at the property line of any property exceeding: 60 dBA from 7:00 a.m. to 10:00 p.m., 55 dBA from 10:00 p.m. to 7:00 a.m., or for air conditioning units, to exceed the ambient base noise level by more than 5 dBA.

The project would include heating, ventilation, and air conditioning (HVAC) units at the building's rooftop, although specific planning data for the future HVAC units are not available at this stage of project design. Modeling assumed that a single typical residential HVAC unit generates a noise level of 56 dBA at a distance of seven feet.

Section 10.80.090 of the City Noise Ordinance states that HVAC units shall not generate noise that would increase the noise level at the property line to exceed the ambient base noise level by more than 5 dBA. Although multiple HVAC units would be required for the project, the units would be located at heights exceeding 40 feet from ground level and would be screened through the use of architectural parapets. At this height, noise

generated by HVAC units would be minimal, and would not exceed existing ambient noise levels. Impacts would be less than significant.

Operational Off-site Transportation Noise

For traffic-related noise, impacts are considered significant if noise levels at nearby NSLUs would increase by 3 CNEL or more.

The project would generate vehicular traffic that would utilize Allison Avenue and Date Avenue. An increase in traffic has the potential to result in increased noise levels along those roadways. The project is expected to generate an additional 882 average daily trips (ADT), with 679 of those trips directed along Allison Avenue west of the project (LLG 2021). As a general rule of thumb, the doubling of a noise source, in this case traffic, would lead to a 3 CNEL increase in noise levels. A 3-CNEL increase would be a noticeable increase and would therefore be considered significant for a permanent noise source. Allison Avenue currently carries approximately 3,900 ADT. An additional 679 trips would not double the traffic, and noise levels would therefore not increase significantly. Additionally, no noise sensitive land uses (NSLUs) are located in the immediate vicinity of the project, with the nearest residences approximately 500 feet to the northwest along University Avenue and Palm Avenue. The traffic generated by the project would therefore not generate an increase in noise levels for nearby NSLUs, and impacts would be less than significant.

On-site Construction Noise

As stated in the City Noise Ordinance, construction activity would be considered significant for residences within 500 feet if construction occurs during the hours of 10:00 p.m. and 7:00 a.m. Construction noise exceeding 10 dBA above ambient noise levels at nearby sensitive receptors would be considered a significant increase.

Construction of the project would require site clearing, grading, installation of underground utilities/infrastructure, construction of new buildings, paving, and architectural coating. The magnitude of the noise would depend on the type of construction activity, equipment, duration of each construction phase, distance between the noise source and receiver, and any intervening structures. Construction would generate elevated noise levels at nearby land uses, although no NSLUs are located in the project's immediate vicinity. The nearest residences are those along University Avenue and Palm Avenue, approximately 500 feet to the northeast. At this distance, and with multiple intervening structures, construction noise at the project site would not be expected to rise above ambient noise levels. Additionally, construction equipment would not all operate at the same time or location and would not be in constant use during the 8-hour operating day. For informational purposes, Table 8, *Construction Equipment Noise Levels*, provides the 500-foot distance noise levels for equipment anticipated to be used for general construction activities. At these distances, construction noise is not anticipated to be audible above ambient noise levels. Impacts would be less than significant.

Table 8
CONSTRUCTION EQUIPMENT NOISE LEVELS

Unit	Percent Operating Time	L _{MAX} at 500 feet	dBA L _{EQ} at 500 feet
Backhoe	40	57.6	53.6
Compactor	20	63.2	56.2
Compressor	40	57.7	53.7
Concrete Mixer Truck	40	58.8	54.8
Concrete Pump Truck	20	61.4	54.4
Crane	16	60.6	52.6
Dozer	40	61.7	57.7
Dump Truck	50	56.5	52.5
Drum Mixer	40	60	57
Excavator	40	60.7	56.7
Front End Loader	40	59.1	55.1
Generator	50	60.6	57.6
Paver	50	57.2	54.2
Roller	20	60	53

Source: HELIX 2021c

L_{MAX} = maximum noise level; dBA = A-weighted decibel; L_{EQ} = equivalent sound level

Note: Modeling results do not include intervening structures that would attenuate noise levels further.

Construction Traffic Noise

As stated earlier under Operational Off-site Transportation Noise, traffic-related noise impacts are considered significant if noise levels at nearby NSLUs would increase by 3 CNEL or more.

It is anticipated that 10 haul trips per day would be required for debris hauling, and 118 daily trips would be required during grading and excavation. Over the course of an 8-hour construction day, it is assumed 15 haul truck trips would occur per hour during grading and excavation. This daily traffic level associated with soil export is anticipated to be the highest daily traffic level associated with project construction.

Existing traffic levels along the nearby streets exceed 3,900 ADT along Allison Avenue. An additional 10 daily trips for debris removal and 118 daily trips for grading and excavation would not be anticipated to increase noise levels above 3 CNEL.

Furthermore, no NSLUs are located along the haul routes leading from the project. Noise levels from 118 additional daily trips would therefore not affect nearby residences. Further, this localized increase in noise from haul trucks would be temporary (estimated at 10 days for site preparation and 30 days for grading and excavation) and would cease upon the completion of construction. Therefore, impacts from construction traffic noise would be less than significant.

- b. Vibration is measured in feet or inches (in). Acceleration is measured by comparing acceleration to that of the Earth's gravity, and this unit is "G." These units of acceleration or velocity are relative to time in seconds (sec) and are noted as in/sec² for acceleration and in/sec for velocity. Displacement is not relative to time and is only shown as inches. Vibration effects can be described by its peak and root mean square (RMS) amplitudes. Building damage is often discussed in terms of peak velocity, or peak particle velocity

(PPV). The PPV is defined as the maximum instantaneous positive or negative peak of the vibration signal. Decibel notation for vibration is noted as VdB.

Excessive ground-borne vibration would occur if construction-related ground-borne vibration exceeds the “strongly perceptible” vibration annoyance potential criteria for human receptors of 0.1 inch per second PPV or the damage potential criteria to relatively old residential structures 0.5 inch per second PPV for continuous/frequent intermittent construction sources (such as impact pile drivers, vibratory pile drivers, and vibratory compaction equipment), as specific by Caltrans (2020). For transit sources, vibration impacts are considered significant if vibration levels would exceed 72 VdB.

A possible source of vibration during general project construction activities would be a vibratory roller, which may be used for compaction of soil beneath building foundations. Construction would not be conducted in the vicinity of off-site residences. The nearest structure is a building across Date Avenue to the west, approximately 75 feet from the project’s building footprint. A vibratory roller would create approximately 0.210 inch per second PPV at a distance of 25 feet (Caltrans 2020). A 0.210 inch per second PPV vibration level would equal 0.063 inch per second PPV at a distance of 75 feet.¹ This would be far lower than the structural damage impact to older structures of 0.5 inch per second PPV and the “strongly perceptible” impact for humans of 0.1 inch per second PPV. Additionally, off-site exposure to such ground-borne vibration would be temporary as it would be limited to the short-term construction period. Temporary impacts associated with the roller (and other potential equipment) would be less than significant.

As a residential development, the project would not generate excessive ground-borne vibration during operations; therefore, no impacts would occur.

The project would be located approximately 85 feet from the Trolley’s railroad track centerline. At a distance of 85 feet from the railroad tracks, the highest on-site measurement was measured at 65 VdB. This measurement was measured at the ground surface and is below the impact criteria levels of 72 VdB. Vibration impacts on the project would therefore be less than significant.

- c. The project site is approximately five miles southwest of Gillespie Field Airport, eight miles southeast of Montgomery Field, and nine mile east of San Diego International Airport. The project site is not located within the Airport Influence Area or noise contour of these airports, as defined in their Airport Land Use Compatibility Plans (San Diego County Regional Airport Authority 2014, 2010a, and 2010b). At these distances, no effects related to airport noise would occur at the project site. Therefore, the project would not expose people residing or working in the project area to excessive noise levels. Impacts would be less than significant.

¹ Equipment PPV = Reference PPV * (25/D)ⁿ (inches per second), where Reference PPV is PPV at 25 feet, D is distance from equipment to the receiver in feet, and n = 1.1 (the value related to the attenuation rate through the ground); formula from Caltrans 2013b.

14. Population and Housing

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☒
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
a. The project would introduce 147 one and two-bedroom units that would result in a direct increase in population in the project area. Based upon the San Diego Association of Governments (SANDAG 2019) rate of 2.40 persons per household, the project has the potential to introduce 353 persons into the project area. This would not represent a substantial unplanned population as the project site is designated as Downtown Commercial, which as outlined in the City's General Plan Land Use Element, encourages residential land uses (City 2012). The Land Use Element, Table LD-4 identifies that the site is compatible with the RB (Residential Business) zone and conditionally compatible with the R-3 (Multiple Family) zone. As stated in Title 24 of the La Mesa Municipal Code, the RB zone is designed for areas which appear to be in transition from residential to business development and it is intended to provide incentives for accommodating a reasonable transition, by permitting apartment-type development. Additionally, Title 24 of the La Mesa Municipal Code states that the R-3 zone is intended for apartment-type development. Thus, while the project would directly induce population growth it would not introduce unplanned growth as this growth is envisioned through the City's General Plan process and the designation of this area for multi-family development in the Land Use Element. Therefore, the project would have no impact in relation to this issue.				
b. The project site is currently contains a parking lot in the western portion and vacant developed and disturbed land elsewhere. No structures, homes, or businesses are present. Therefore, the project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere and no impact would occur in relation to this issue.				

15. Public Services

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				
i. Fire protection?	☐	☐	☒	☐
ii. Police protection?	☐	☐	☒	☐
iii. Schools?	☐	☐	☒	☐
iv. Parks?	☐	☐	☒	☐
v. Other public facilities?	☐	☐	☒	☐

- a.i. The project site is already served by Heartland Fire and the nearest fire station is approximately 500 feet west of the project site at 8034 Allison Avenue (Station 11). Based on SANDAG's estimate of 2.40 persons per household for La Mesa, (SANDAG 2019), the project would result in an additional 353 people in the project area. This growth was envisioned in the City's General Plan and as stated in the General Plan EIR, construction of new fire facilities is not anticipated to serve General Plan growth (City 2013) Therefore, although the project would potentially result in increases in calls for fire protection and/or emergency service, no new facilities or improvements to existing facilities would be required as a result of the project.

The proposed project is in a developed urban area of La Mesa, which is not considered at high risk for wildland fires and is not adjacent to any undeveloped areas that are susceptible to wildland fires. Furthermore, the proposed project would comply with the City's Fire Code (La Mesa Municipal Code Title 11), including applicable requirements for fuel management, brush clearance, and sprinklers for the proposed buildings to minimize on-site fire hazards. Heartland Fire provided input in the design of the proposed project to ensure that it meets state and local fire safety standards. Therefore, the project would not result in substantial adverse physical impacts associated with the provision of new or physically altered fire facilities. Impacts would be less than significant in relation to this issue.

- a.ii. The project proposes 147-family residential units housing approximately 353 residents, which would increase the demand for police protection services in the service area and could potentially adversely impact current response times. The project site is currently provided with police protection services by the La Mesa Police Department. The nearest

police facility (approximately 480 feet northwest) is the 40,000-SF Police Department Headquarters building located at 8085 University Avenue. Typical of residential developments, the project would result in a generation for services in relation to property crimes or crimes against persons, however these types of crimes are not considered unique. As discussed, the project is consistent with projected General Plan growth and the General Plan EIR identified that no new or physically altered facilities within the City would be required to serve the growth associated with the buildout of the General Plan. Therefore, impacts would be less than significant in relation to this issue.

- a.iii. The project includes the development of 147 multi-family units, some of which may house school-aged children. The project site is located within the boundaries of the La Mesa – Spring Valley School District (LMSVSD), which serves elementary and middle school age students and Grossmont Union High School District (GUHSSD), which serves high school age students.

As discussed, using approved planning forecasts, the project would result in 353 new persons in the project area, some of which may be school-age children. There would be an increase in the demand for school services if the units are ultimately occupied by people from outside the City.

California Code of Regulations Section 65995 and California Education Code Section 17620 allow school districts to levy fees on residential and/or commercial/industrial construction projects within a school district's boundaries. The State Allocation Board (SAB) Developer fees may be used for multiple purposes, including to fund construction or reconstruction of school facilities, and to fund costs attributable to the increased demand for public facilities reasonably related to the development in order to refurbish existing facilities to maintain the existing level of service or achieve an adopted level of service that is consistent with a general plan sets the per-square-foot Level I school impact fees (developer fees) every two years. The legislation holds that an acceptable method of offsetting a project's effect on the adequacy of school facilities is payment of a school impact fee prior to issuance of a building permit. Once paid, the school impact fees would serve as mitigation for any project-related impacts to school facilities. As such, the City is legally prohibited from imposing any additional mitigation related to school facilities, as payment of the school impact fees constitutes full and complete mitigation. Therefore, with payment of the required fee, impacts would be less than significant in relation to this issue.

- a.iv. In order to generate funds for park improvements or to acquire land for parks, the City adopted two park development impact fees as part of the City's Municipal Code, including the Residential Parkland Dedication In-lieu Fee (La Mesa Municipal Code Section 9.20.040) and the Residential Park Improvement Impact Fee (La Mesa Municipal Code Section 9.20.050). These impact fees are designed for single and multi-family residential developments to mitigate the impact of new development on the City's existing facilities and infrastructure. Residential development projects are obligated to dedicate three acres of undeveloped parkland per one thousand people. The fees developed were based on population and growth projections, facility standards, amount/cost of facilities required to accommodate growth, and total cost of facilities per unit of development. By collecting these fees, the goals and priorities of the City's recreational space and facilities standards established in the Parks Master Plan and General Plan can be met (City 2012). However, the City's impact fee waiver policy provides for park development impact fees to be waived for projects that contain 100 percent affordable housing units and therefore, the project is not required to pay parks fees.

The project does not include the provision of new parks, yet with the increase in residents there would be a corresponding increase in the demand for park services in the area. However, as outlined in response to item 14 a., the project would not result in substantial unplanned growth. As stated in the General Plan, the projected population growth does not necessitate the development of new park space and notes that new park space would be difficult to achieve in an urban environment (City 2012). Further the General Plan states that it is the intent to increase pedestrian access to existing parks (City 2012). One of the project objectives is to create a pedestrian friendly environment and the project includes several design features to promote walkability, which is consistent with the General Plan approach. Therefore, since the project is consistent with projected General Plan growth and the General Plan EIR identified that no new or physically altered facilities within the City would be required to serve the growth associated with the buildout of the General Plan, impacts would be less than significant in relation to this issue.

- a.v. Future residents of the developed project may occasionally visit other public facilities such as senior centers, community centers, public pools, and libraries. All of these facilities are intended to serve the general public. The added population from this project would have a less than significant impact on the facilities, as only a small percentage of the project's residents would visit a particular facility on a given day. In addition, the project is consistent with projected General Plan growth and the General Plan EIR identified that no new or physically altered facilities within the City would be required to serve the growth associated with the buildout of the General Plan. The proposed project would not individually result in a need to construct new types of other public facilities. Impacts would be less than significant in relation to this issue.

16. Recreation

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☒	☐
a. The introduction of 147 residential units would introduce people into the project area who would use recreational facilities both within the project site and in the greater vicinity. According to the City's General Plan EIR, the buildout of the General Plan planning area does not necessitate the need for additional park space in the City, which would be difficult to achieve in an urban built-out environment (City 2013). Instead, the focus should be upon pedestrian access to existing neighborhood parks and additional recreational amenities within the urban context. This is consistent with General Plan Recreation and Open Space Element Policy RO-3.1.1, that directs planned residential developments, mixed-use projects, and multiple-family residential projects to provide usable on-site open space areas as a supplement to the public parks and open space system. Correspondingly, the project design				

includes the podium-level outdoor courtyards that include passive, landscaped outdoor amenities including a spa and outdoor living areas. A skydeck and lounge area would be created on the top floor of the building and the ground floor includes a clubhouse area with game and exercise facilities. In addition, the project is strategically located in the downtown village and with pedestrian accessibility to recreational amenities. The Stroll is a flat, one-mile beginner route and starts at the La Mesa Railroad Depot and the La Mesa Art Alliance created a two-mile walk highlighting art throughout the Downtown Village. There are also two pocket parks as identified in the City's General Plan Recreation and Open Space Element, one that includes the La Mesa Railroad Depot and the other is the Walkway of the Stars that connects Allison Avenue and La Mesa Boulevard.

The residents in the proposed development would likely visit and utilize the various existing parks, recreation facilities, and trails throughout the city and surrounding region. However, these visits would be intermittent and would not occur en masse. The City's existing park and recreation facilities can accommodate this type of occasional use and would not experience a physical deterioration from these types of uses and visits. The project provides everyday recreational opportunities for the project residents on-site. Therefore, the project itself would not lead to substantial physical deterioration of any recreational facilities and would have less than significant impacts in relation to this issue.

- b. Please see item 16.a. The proposed project does not involve, and would not require, the construction or expansion of off-site recreational facilities. The environmental effects associated with development of the project site, which includes recreation facilities associated with the proposed project, are discussed throughout this IS/MND. There would be no unique or extreme effects attributable to the proposed recreational functions, as the on-site recreation areas would be limited to activities by on-site residents. Therefore, the proposed on-site recreational facilities would have a less than significant impact on the environment.

17. Transportation

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☐	☒
b. Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?	☐	☐	☒	☐
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒
d. Result in inadequate emergency access?	☐	☐	☒	☐

Linscott, Law, and Greenspan (LLG) prepared a Transportation Impact Analysis (TIA) in May 2021 that includes a local mobility analysis and vehicle miles traveled (VMT) analysis for the project. The TIA is included as Appendix H of this IS/MND and is summarized below.

- a. The proposed project would be consistent with applicable transportation plans, including San Diego Forward: The Regional Plan, the Circulation Element of the General Plan, The Smart Growth – Pedestrian and Bicycle Improvements Plan, and the City of La Mesa Bicycle Facilities and Alternative Transportation Plan, as discussed below.

San Diego Forward Regional Plan

The proposed project would be consistent with the overarching principles of the Regional Plan of increasing residential concentrations in areas served by transit and implementation of smart growth designed to strengthen the integration of land use and transportation. The project site is identified as a smart growth area on SANDAG's Smart Growth Concept Map (SANDAG 2016). Each smart growth place type is associated with certain housing and employment density targets and transit service thresholds. In particular, the site is identified as site LM-2 and is designated a Town Center Smart Growth place type. Further, site LM-2 is designated as an existing/planned smart growth area, which is a location that either contains existing smart growth development or allows planned smart growth in accordance with the identified land use targets and are accompanied by existing or planned transit services included in The Regional Plan. Site LM-2 is described as an area with planned infill development of residential and commercial uses exist in the historic La Mesa Village, which is located adjacent to the Downtown La Mesa transit center. A trolley station and local bus routes serve this neighborhood. The minimum land use and transit targets for a Town Centers includes a minimum residential target of 20 dwelling units per acre and minimum transit service characteristics of Trolley, SPRINTER, Rapid Service, or Streetcar/Shuttle. The proposed project would be consistent with both the land use target and transit characteristics through the provision of 147 residential units within proximity to the trolley and bus transit services,

In addition, the project would be consistent with other Regional Plan goals and strategies of increasing transportation mode choices and reducing reliance on the single-occupancy automobile. The project's strategic location adjacent to civic and commercial land uses promote pedestrian alternatives in conjunction with the proximity to the trolley station and bus stops.

La Mesa General Plan Circulation Element

The General Plan contains several Circulation Element alternative transportation policies that are primarily programmatic rather than implemented at the project level. However, at the project-level, the project would support Goal CE-5 to provide opportunities that encourage safe pedestrian travel and Objective CE-3.1 to maximize the utility of La Mesa's transit services. As noted throughout this IS/MND, one of the objectives of the project is to create a pedestrian friendly environment and the project includes several design features to promote walkability and is strategically located within walking distance to transportation facilities.

The project would likely add new users to nearby alternative transportation facilities, yet the addition of 353 persons is consistent with the General Plan buildout projections. The project is considered a TOD, higher intensity development that is within a short distance of the transit station (typically 300 to 500 feet). The project site is 500 feet from the La Mesa

Trolley Station and MTS bus lines. Transit service is provided to the area via the Orange trolley line and bus routes 1 and 852 as discussed below.

Orange Line: The Orange trolley line provides single-line service to both the downtown courthouse and Arnele Avenue in El Cajon with several stops in between. Through interconnections with the Blue and Green trolley lines, service is provided as far east as Santee, as far south as San Ysidro, and to several locals such as San Diego State University, Santa Fe Rail Station (Coaster and Amtrak service), and eventually University of San Diego.

Route 1: Route 1 provides bus service between the Hillcrest Transit Center and Grossmont Transit Center and operates between 4:49 a.m. and 11:14 p.m. with a 15-minute frequency for the most part of the day on weekdays and between 6:28 AM to 8:34 PM with a frequency of a 30-minute frequency on weekends.

Route 852: Route 852 provides bus service from University Avenue/54th Street to Grossmont transit Center operates from 5:00 am to 11:00 pm Monday through Friday at 30-minute frequency during the AM and PM peak hours. On Saturdays, this route runs from 6:30 AM to 10:30 PM and on Sundays from 6:30 AM to 9:30 PM at 30-minute frequency.

Thus, the project's accessibility to both the trolley and bus lines is consistent the with the Circulation Element's strategy to encourage alternative transportation.

Smart Growth – Pedestrian and Bicycles Improvement Plan

The Smart Growth – Pedestrian and Bicycle Improvements Plan was prepared to assist pedestrians and bicyclists feel more comfortable navigating downtown La Mesa (Kimley Horn 2015). In general, the Smart Growth- Pedestrian and Bicycle Improvements Plan includes a variety of strategies that improve safety and accessibility for pedestrians and bicyclists. The project would be a TOD and encouraging the use of alternative transportation and does not include any features that would obstruct implementation of the proposed projects on the Smart Growth – Pedestrian and Bicycle Improvements Plan.

Bicycle Facilities and Alternative Transportation Plan

The Bicycle Facilities and Alternative Transportation Plan is a conceptual plan that addresses opportunities to connect and integrate existing and proposed bicycle and pedestrian facilities. Within the vicinity of the project, the Bicycle Facilities and Alternative Transportation Plan identifies the recommendation of Class II bike lane along Allison Avenue from University Avenue to La Mesa Boulevard. The project does not include any improvements or realignments, etc., to roadways and would not conflict with any of the proposed facilities.

Therefore, since the project does not conflict with the San Diego Regional Forward Plan, the City's General Plan, the Smart Growth– Pedestrian and Bicycle Improvements Plan, the Bicycle Facilities and Alternative Transportation Plan, is designed to promote walkability, and within 500 feet of a transit facility that is serviced by both the trolley and bus lines, the project would have no impact in relation to this issue.

- b. In September 2013, the Governor's Office signed Senate Bill (SB) 743 into law, starting a process that fundamentally changes the way transportation impact analyses are conducted

under CEQA. In response to the passage of SB 743, the Governor's Office of Planning and Research (OPR) was required to amend the CEQA Guidelines to provide a new approach to evaluating traffic impacts. These changes include the elimination of auto delay, level of service, and similar measurements of vehicular roadway capacity and traffic congestion as the basis for determining significant impacts. The mandate of SB 743 was to devise an alternative traffic impact evaluation criterion that would promote the reduction of GHG emissions as well as foster the development of multi-modal transportation networks and a diversity of land uses. SB 743 further suggested that a measurement such as vehicle miles traveled (VMT) would be an appropriate method to evaluate traffic impacts. VMT is defined as a measurement of miles traveled by vehicles within a specified region and for a specified time period. VMTs are calculated based on individual vehicle trips generated and their associated trip lengths.

The Institute of Transportation Engineers (ITE) San Diego Section prepared the Guidelines For Transportation Impact Studies in May 2019 for use in the San Diego Region. The recommended methodology for conducting a VMT analysis is based on guidance prepared by OPR as provided in the published Technical Advisory on Evaluating Transportation Impacts in CEQA (OPR 2018).

The basic process to determine impacts is to compare a project's estimated VMT/capita or VMT/employee to average values on a regional, citywide, or community basis. The target is to achieve a project VMT/capita or VMT/employee that is 85 percent or less of the appropriate average based on suggestions in the OPR VMT guidelines. The methodology for determining VMT/capita or VMT/employee is related to the project's expected daily trip generation.

In addition, OPR's technical advisory contains the following guidance regarding projects located near transit stations. Proposed CEQA Guideline Section 15064.3, subdivision (b)(1), states that lead agencies generally should presume that certain projects (including residential, retail, and office projects, as well as projects that are a mix of these uses) proposed within a half mile of an existing major transit stop or an existing stop along a high-quality transit corridor will have a less-than-significant impact on VMT.² This presumption would not apply, however, if project-specific or location-specific information indicates that the project will still generate significant levels of VMT.

The TIA determined that the project would generate a total of 882 average daily trips (ADT). The ITE guidelines consider a project that has less than or equal to 200 ADT to be screened out of a VMT analysis; hence the project is not screened out based on ADT. However, the project is located within a half mile distance of the La Mesa Boulevard Trolley Station and adjacent to the Metropolitan Transit Station (MTS) bus stop serving Routes 1 and 852. The Orange Trolley line connects La Mesa to downtown San Diego in the west to El Cajon in the east and operates with a 15-minute frequency during the peak hours, Monday through Friday. Bus Route 1 connects Fashion Valley Transit Center in the west to downtown La Mesa and operates with a 15-minute frequency during the peak hours, Monday through Friday. The Orange Trolley line and MTS bus Route 1 both meet the criteria of a high-quality

² An existing major transit stop is defined as a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods. For the purposes of these guidelines, the distance between the project site and the transit station is typically based on direct walking distance without missing sidewalks or physical barriers.

transit corridor. Therefore, based on the convenient and the close walkable access to the trolley and bus services, the project is screened out and a detailed transportation VMT analysis is not required. The project would have less than significant impacts in relation to this issue.

- c. There would be no hazardous design features or incompatible uses introduced because of the project. Access to the project would be via a drive to the parking garage that is provided along Date Avenue. The project does not propose any new roadways or alterations to existing roadways. No unique roadway features, traffic patterns, or incompatible vehicles would be introduced as part of the development. As a result, the project would not substantially increase hazards due to a design feature. Development of the proposed project would not increase traffic hazards due to incompatible uses that could affect existing traffic or circulation in the project area. No impact would occur in relation to this issue.
- d. During construction of the project, heavy construction-related vehicles could interfere with emergency response to the site or emergency evacuation procedures in the event of an emergency (e.g., vehicles traveling behind the slow-moving truck). However, such trips would be brief and infrequent. Furthermore, as discussed in item 9. f., the City requires traffic control plans for any construction activity that will disrupt traffic flow on city streets and project conditions of approval would require that emergency access be maintained during construction. Upon construction, emergency vehicle access would be provided via Allison and Date Avenues. Impacts would be less than significant.

18. Tribal Cultural Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☐	☒	☐
ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code §5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code §5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☐	☒	☐
a.i-ii In accordance with the requirements of AB 52, the City has initiated correspondence and sent out notification letters regarding the project to Native American Tribes traditionally and culturally affiliated with the project area on July 12, 2021. No responses or requests for consultation were received.				

Due to the highly disturbed nature of the project site and the previous ground disturbance, it is unlikely that project construction activities would extend into previously undisturbed materials. Thus, the likelihood to encounter intact subsurface tribal cultural resources is low. However, there is still a possibility for buried, unknown tribal cultural resources to occur. As noted in item 5.b, as a condition of approval, a note shall be placed on the building plans stating that should any archeological (cultural) resources or human remains be discovered during construction-phase ground-disturbing activities, all work in the immediate vicinity must stop and the project applicant shall notify the City immediately. A qualified professional shall be retained to evaluate the finds and recommend appropriate action. For human remains, the applicant shall notify the County Coroner. For human remains determined to be of Native American origin, the procedures outlined in CEQA Section 15064.5 (d) and (e) shall be followed. The applicant shall ensure, to the satisfaction of the City and the Native American Heritage Foundation, if applicable, that appropriate measures are undertaken prior to resuming any project activities that may affect such resources. With the inclusion of this condition of approval and the required regulatory compliance, impacts to tribal cultural resources would be less than significant.

19. Utilities and Service Systems

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	☐	☐	☒	☐
c. Result in a determination by the waste water treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d. Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐
a. The project would introduce new impervious surfaces that would increase the amount and rate of stormwater runoff as well as new residents to the area that would generate a demand for utility services.				

The proposed project would connect to the existing municipal utilities infrastructure through local connections at the site. Utilities are present in the project site and previously served

the site when it contained a police station. Project design includes storm drain infrastructure that would collect and convey runoff through a series of roof and podium drains which would capture storm water that would enter a pretreatment unit and be conveyed to a cistern. The captured runoff would then be discharged to a biofiltration system and discharged to the public storm drain system via a system of catch basins and overflow and curb drains. The proposed water delivery system is a master meter with a dedicated fire line. Dry utilities that include electric, gas, and telecommunication infrastructure would also be extended to the site from existing infrastructure. The project would not result in the need for new or expanded water, wastewater treatment or storm drainage, electric power, natural gas, or telecommunication facilities. Impacts would be less than significant.

- b. Helix Water District (District) supplies water to the site and has indicated that the District would be able to provide service to the site (District 2021). The District prepared a UWMP that provides forecasts for water demand and supply. As part of the planning process, current and projected population data within the District's service area is provided by SANDAG and the growth parameters established by local community general plans. Thus, since the project is consistent with the General Plan designation of Downtown Commercial, the project's growth is accounted for in the UWMP.

The UWMP (in Table 7-4, Multiple Dry Years Supply and Demand Comparison identifies the District's water supply and projects the reliability through the 25-year planning horizon, for a single year and five consecutive dry years beginning in year 2025. The District forecasts indicate that even for a 6-year dry period, the District would continue to have adequate supply to meet the service area demands. Through the exercise of preparing the UWMP, the District concluded that if supplies continue to be developed as planned and conservation measure continue to be employed, no shortages are anticipated for the District during future normal, single-dry years, or a consecutive five-year drought through the 25-year planning horizon to 2045 (UWMP 2021). Thus, since the project's water demands have been accounted for in the UWMP and that the District has not forecasted any shortages under any scenarios, the project would have a less than significant impact in relation to this issue.

- c. The City is a member of the Metro Wastewater Joint Powers Authority (MWJPA), a coalition of agencies that utilize the Point Loma Wastewater Treatment Plant (WTP) operated by the City of San Diego. Wastewater generated within the City is collected by the City's sewer service and then conveyed to the Point Loma WTP located at the south end of the Point Loma peninsula. The Point Loma WTP treats approximately 175 million gallons per day (mgd) of wastewater generated in a 450-square-mile area by more than 2.2 million residents. The WTP has a treatment capacity of 240 mgd (City of San Diego 2020). The Point Loma WTP is owned and operated by the City of San Diego and allows 15 other municipalities, including La Mesa, to purchase allocations of wastewater treatment capacity at the plant.

The project would increase wastewater generation at the site due to the construction of additional housing units. The City's Wastewater Master Plan identifies a generation rate of 180 gallons per day (gpd) for multi-family residential units. (City 2008). Based on this rate the project would generate 26,460 gpd of wastewater. Given the WTP's existing remaining treatment capacity of 65 mgd, the project's increase would represent less than one tenth of a percent of the WTP's remaining capacity. Therefore, the Point Loma WTP has adequate capacity to serve the project's projected demand in addition to its existing commitments. Impacts would be less than significant.

- d. The project would generate solid waste during construction activities. Title 14 of the La Mesa Building Code (Chapter 14.27, Construction and Demolition Debris Diversion Deposit Program) requires that a Project applicant recycle or reuse 75 percent of designated recyclables (including asphalt, concrete, and dirt reuse) from a project.

Once operational, would result in an increase in domestic municipal solid waste generation because of the proposed land use. In accordance with AB 341, the project would divert at least 75 percent of operational waste from landfills through reuse and recycling in and provide areas for storage and collection of recyclables and yard waste in accordance with 2019 Title 24 Part 11 CALGreen Standards. Following such standards would ensure that the project would also comply with Title 7.22, Mandatory Recycling, of the La Mesa Municipal Code and AB 939, which mandates that 50 percent of solid waste generated be diverted from landfill disposal through source reduction, recycling, or composting. Once constructed, solid waste and recycling generated from the project site would be typical of that generated by similar residential uses.

The project site would be serviced by EDCO, which maintains a current contract with the City, and all waste would be disposed of at either the Sycamore Landfill or the Otay Landfill. Based on the 2017 Five-Year Review Report of the Countywide Integrated Solid Waste Management Plan prepared for San Diego County pursuant to AB 939, the County has sufficient landfill capacity to accommodate disposal for at least the next 15 years, which meets the state requirements that the County maintains a minimum of 15 years of future disposal capacity. Therefore, the project would not generate solid waste in excess of state or local standards or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. It would also comply with federal, state, and local management and reduction statutes and regulations related to solid waste. Thus, the project would have a less than significant issued in relation to this issue.

- e. Please see response to item 19.d. Additionally, the proposed project would be required to comply with all regulations related to solid waste such as the California Integrated Waste Management Act and city recycling programs; therefore, impacts would be less than significant.

20. Wildfire

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒
a. Please refer to items 9.f and 17.c. The project would have a less than significant impact in relation to this issue.				
b. The project site is level and void of slopes. The surrounding area is highly developed and does not support the common characteristics identified as a wildfire risk, such as difficult terrain, inadequate access, and unmaintained vegetation. As discussed in item 9.g, the project is not within a very high fire hazard severity zone as mapped by CALFIRE. The project would have no impact in relation to this issue.				
c. Please refer to item 20.b. The proposed project is located in a developed area. The project does not involve the installation of fuel breaks, emergency water sources, or power lines. The project would involve the extension or upgrades of existing utilities, such as sewer, water, electric, gas, and telecommunication facilities. Such utility improvements would not exacerbate fire risk or result in temporary or ongoing impacts to the environment. Therefore, no impact would occur in relation to this issue.				
d. Please refer to items 7.a-d and item 20.b. The project is in an urban area. The 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 project would not result in 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. No impact would occur in relation to this issue.				

21. Mandatory Findings of Significance

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Does the project:				
a. Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
b. Have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	☐	☒	☐	☐
c. Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

- a. The project site is an asphalt and gravel parking lot and vacant developed/disturbed land in an urban area. The site does not contain or support any sensitive habitat or special status species.

The project would not affect any known archaeological, tribal cultural, or paleontological resources. Yet, while the project site is highly disturbed, there is still the potential for unknown paleontological resources to be disturbed or uncovered during project construction. With required compliance with regulatory codes for discovery of archaeological or tribal cultural resources and implementation of mitigation measure PAL-1, the project would not eliminate important examples of the major periods of California history or prehistory.

- b. A total of eight cumulative projects have been identified in consultation with the City for inclusion in the cumulative analysis, which include the following:
- Costco Gas Station: includes the installation of a gas station at an existing Costco store on Fletcher Parkway, just north of Baltimore Drive.
 - Alvarado Specific Plan: includes the up to 950 apartments in four buildings on a site south of I-8 and east of 70th Street.
 - Lake Murray Village: includes the development of a 2,000- SF Starbucks coffee shop located in the northwest quadrant of the Jackson Drive/Center Drive intersection in the City of La Mesa.

- Spring Street Starbucks: includes a 1,850-SF coffee shop located in the northeast quadrant of the Spring Street/Palm Avenue intersection in the City of La Mesa.
- Spring Street Mixed-Use Project: consists of 48 multi-family dwelling units located at 4210 Spring Street.
- 7601 University Avenue Project: consists of 60 multi-family dwelling units.
- Jefferson La Mesa project: consists of 230 multi-family dwelling units and 4 live/work units. The “work” part is 712 SF per unit, for a total of 2,848 SF. The total square footage of these dwelling units is 165,760.
- Montebello: consists of Montebello North and Montebello South and is located east of Maple Avenue on either side of El Cajon Boulevard. Montebello North Site consists of 120 multi-family units and 6,000 of retail. This development will replace the existing 37 multi-family units, 5 single family units and 5,500 restaurant/specialty retail currently on the site. Montebello South is located in the southwest quadrant of the El Cajon Boulevard/Maple Avenue intersection and consists of 80 apartments, 5,000 SF of specialty retail and 3,000 SF of office.

There may be short-term cumulative impacts in relation to any diversion of traffic or access to the greater project site area. However, as with the project, other cumulative projects would be required to prepare traffic control plans that would require approval of the City Engineer prior to the issuance of the appropriate permits. Further, the Transportation Impact Analysis (see Appendix H) prepared for the project evaluated the potential for cumulative impacts to occur in relation to the projects listed above and the proposed project. It was determined that no significant transportation impacts would occur.

Likewise, cumulative impacts to paleontological resources could be significant if not mitigated. With the implementation of mitigation measure PAL-1, the project’s contribution would not be cumulatively considerable.

As discussed under item 3.b., the project’s long-term emissions of criteria pollutants and precursors would not exceed the SDAPCD daily or annual screening thresholds. Therefore, the project’s operational activities would not result in a cumulatively considerable net increase of criteria pollutants that would violate any air quality standard or contribute substantially to an existing or projected air quality violation. Similarly, the project would have a less than significant impact in relation to GHG, which is inherently discussed in terms of cumulative impacts.

All resource topics associated with the project have been analyzed in accordance with State CEQA Guidelines and found to pose no impact, less-than-significant impact, or less than significant with mitigation. Potential cumulative projects that could be constructed in the vicinity of the project would be required to comply with existing applicable federal, state, and local regulations.

- c. The project would not consist of any uses or activities that would negatively affect persons in the vicinity. In addition, all resource topics associated with the project have been analyzed in accordance with CEQA and the State CEQA Guidelines and found to pose no impact, less-than-significant impact, or less than significant with mitigation. As discussed in Section 9, Hazards and Hazardous Materials of this IS/MND, there are no concerns from past activities

at the site and no present hazardous materials and/or wastes concerns have been identified. Further, there is the potential for land use consistency conflicts in relation to noise impacts upon future residents of the project site; however, with implementation of mitigation measure LU-1, potential impacts are reduced to less than significant. Consequently, the project would not result in any environmental effects that would cause substantial adverse effects on human beings directly or indirectly.

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