#332
11/05/19

(R-2020-187)

RESOLUTION NUMBER R- 312739

DATE OF FINAL PASSAGE NOV 12 2019

A RESOLUTION OF THE COUNCIL OF THE CITY OF SAN DIEGO MAKING CERTAIN FINDINGS AND DETERMINATIONS, AND APPROVING A DISPOSITION AND DEVELOPMENT AGREEMENT RELATED TO THE HILLTOP & EUCLID AFFORDABLE HOUSING PROJECT IN THE SOUTHEASTERN SAN DIEGO MERGED REDEVELOPMENT PROJECT AREA.

WHEREAS, from its formation in 1958 until its elimination on February 1, 2012, the Redevelopment Agency of the City of San Diego (Former RDA) administered the implementation of various redevelopment projects, programs, and activities within designated redevelopment project areas throughout the City of San Diego (City); and

WHEREAS, the Former RDA dissolved as of February 1, 2012, in accordance with a deadline for elimination of all redevelopment agencies throughout California set forth in Assembly Bill x1 26 (AB 26), as modified by the California Supreme Court in *California Redevelopment Assn. v. Matosantos*, 53 Cal.4th 231 (2011); and

WHEREAS, pursuant to Resolution R-307238 adopted by the City Council effective January 12, 2012, the City, solely in its capacity as the designated successor agency to the Former RDA (Successor Agency), elected to serve as the successor agency to the Former RDA, and the City also elected to serve as housing successor to the Former RDA in order to retain housing assets and assume housing responsibilities; and

WHEREAS, at the time of the Former RDA's dissolution on February 1, 2012, the Successor Agency became vested with all of the Former RDA's authority, rights, powers, duties, and obligations under the California Community Redevelopment Law and, by operation of law,

received all assets, properties, contracts, leases, books and records, buildings, and equipment of the Former RDA; and

WHEREAS, the Successor Agency is winding down the Former RDA's operations in accordance with AB 26, enacted on June 28, 2011, Assembly Bill 1484, enacted on June 27, 2012, and subsequent related legislation; and

WHEREAS, the Successor Agency transferred the Former RDA's affordable housing assets (Housing Assets) to the City as housing successor on or about January 28, 2013, based on the approval by the Oversight Board and the California Department of Finance (DOF) of the City's comprehensive list of housing assets in accordance with California Health and Safety Code (Code) section 34181(c); and

WHEREAS, one of the Housing Assets in the City's ownership consists of approximately 8.76 acres of real property located on the northwest intersection of Hilltop Drive and Euclid Avenue in the Chollas View neighborhood in the Encanto community in the City of San Diego (Site); and

WHEREAS, the Oversight Board and the DOF approved the list of housing assets based on the express representation that the City would cause the Site (as well as other "mixed-use" assets) to be developed with a combination of affordable housing units and other potential uses, consistent with Code section 34176(f); and

WHEREAS, the City as housing successor created a new, separate fund, known as the Low and Moderate Income Housing Asset Fund (Housing Asset Fund), for purposes of depositing any encumbered funds related to the Housing Assets and retaining any revenues generated from the Housing Assets in the future, as required by Code section 34176(d); and

WHEREAS, Code sections 34176(d) and 34176.1(a) obligate the City to expend all monies in the Housing Asset Fund for specified affordable housing purposes; and

WHEREAS, the City has negotiated a Disposition and Development Agreement (DDA) with Hilltop Family Housing, L.P., a California limited partnership (Affordable Developer), a copy of which is included as Attachment C to the Staff Report dated June 6, 2018, accompanying this Item at the November 5, 2019 City Council meeting (Staff Report); and

WHEREAS, the DDA requires the City to convey fee title ownership of an approximately 4.53-acre portion of the Site located north of Hilltop Drive and east of, and including, the arroyo that bisects the Site (Affordable Project Property) to Affordable Developer for a purchase price of $1.00, and requires Affordable Developer to develop the Affordable Project Property with 113 residential rental units, commercial space, various site improvements, and parking (Affordable Project); and

WHEREAS, 111 of the 113 residential rental units in the Affordable Project will be restricted as housing that is affordable to extremely low-income, very low-income, or low-income households as specified in 55-year affordability covenants to be recorded against the Affordable Project Property in accordance with the DDA; and

WHEREAS, the DDA provides for a residual receipts loan by the City to Affordable Developer in an amount not to exceed $5,850,000 (City Loan), proposed to include up to $3,369,606.08 from the Housing Asset Fund, and the following pre-2011 housing bond proceeds (collectively, Bond Proceeds), with the following estimated amounts to be adjusted as needed to allow expenditure of the bond proceeds plus all accrued interest: (i) $368,637.66 from Centre City Redevelopment Project Area Tax Allocation Bonds, Series 2004C, Fund No. 200571; (ii) $0.08 from Centre City Redevelopment Project Area Tax Allocation Bonds, Series 2004D, Fund

No. 200573; (iii) $904.70 from Centre City Redevelopment Project Area Tax Allocation Bonds, Series 2006B, Fund No. 200571; (iv) $1,104,801.01 from Centre City Redevelopment Project Area Tax Allocation Bonds, Series 2008, Fund No. 200586; (v) $135.14 from Horton Plaza Redevelopment Project Area Tax Allocation Bonds, Series 2003C, Fund No. 200572; (vi) $2,761.14 from North Bay Tax Allocation Bonds, Series 2000, Fund No. 200562; (vii) $4.94 from Central Imperial Housing Set Aside Tax Allocation Bonds, Series 2007A, Fund No. 200553; and (viii) $1,003,149.25 from Central Imperial Housing Set Aside Tax Allocation Bonds, Series 2007B, Fund No. 200557; and

WHEREAS, the City Loan includes a predevelopment loan in an amount not to exceed $2,626,626 as set forth in the DDA; and

WHEREAS, pursuant to Code section 34176(g), commitments for expenditure of pre-2011 housing bond proceeds are valid and binding only when they are included in an approved Recognized Obligation Payment Schedule (ROPS); and

WHEREAS, lines 631, 632, 643 and 644 of the Fiscal Year 2017-18 ROPS, approved by the DOF as of April 10, 2017, include expenditure of pre-2011 housing bond proceeds in an amount sufficient to cover the proposed expenditure of Bond Proceeds for the City Loan; and

WHEREAS, consistent with the California Environmental Quality Act (CEQA), the environmental impacts of development within the Encanto Neighborhoods Community Plan area have been reviewed under the Final Program Environmental Impact Report for the Southeastern San Diego and Encanto Neighborhoods Community Plan Updates (Program FEIR), certified by the City Council on December 2, 2015 with Resolution R-310077; and

WHEREAS, the City has administered preparation of the CEQA Consistency Evaluation for the DDA and the PSA (Consistency Evaluation), in accordance with CEQA and related state

and local guidelines, and a copy of the Consistency Evaluation is included as Attachment F to the Staff Report and is incorporated fully into this Resolution; and

WHEREAS, the Consistency Evaluation sets forth findings that the Affordable Project is within the scope of the development program analyzed in the Program FEIR and will not result in new or increased environmental effects compared to what already has been evaluated in the Program FEIR; and

WHEREAS, in accordance with Code section 33433(a)(1), the City Council held a public hearing on November 5, 2019, to consider the approval of the DDA after publishing notice of the public hearing as specified in California Government Code section 6066; and

WHEREAS, in accordance with Code section 33433(a)(2), the City administered the preparation of a "Summary Report" dated April 2018, attached to the Staff Report as Attachment D; and

WHEREAS, the City has made copies of the DDA, the Summary Report, and the Consistency Evaluation available for public inspection and copying no later than the time of the first publication of the notice of the public hearing; and

WHEREAS, the City Council has considered the information in the Summary Report, which contains a summary describing and specifying all of the following:

(i) The cost of the DDA to the City; and

(ii) The estimated value of the Affordable Project Property to be conveyed by the City under the DDA, determined at the highest and best use permitted under the Redevelopment Plan for the Southeastern San Diego Merged Redevelopment Project Area, as amended (Redevelopment Plan); and

(iii) The estimated value of the Affordable Project Property, determined at the use and with the conditions, covenants, and development costs required by the DDA; and

(iv) The purchase price for the Affordable Project Property under the DDA, along with an explanation as to why the purchase price is less than the fair market value determined at the highest and best use consistent with the Redevelopment Plan; and

(v) An explanation of why the City's sale of the Affordable Project Property in accordance with the DDA will assist in the elimination of blight, with reference to all supporting facts and materials relied upon in making this explanation; and

WHEREAS, the Summary Report discloses that the estimated fair market value of the Affordable Project Property at its highest and best use is $6,606,600, and that the estimated fair reuse value of the Affordable Project Property, taking into account the conditions, covenants, and development costs required by the DDA, is negative $5,850,000; and

WHEREAS, the City Council believes that the DDA is in the best interests of the City and the health, safety, morals and welfare of its residents, and in accordance with the public purposes and provisions of applicable state and local law and requirements; and

WHEREAS, in making the resolutions set forth below, the City Council is relying solely on its independent judgment, and has considered any written evidence and/or testimony received in support of or in opposition to the DDA, as well as the entire record prepared by City staff; NOW, THEREFORE,

BE IT RESOLVED, by the City Council of the City of San Diego (Council), as follows:

1. The Council finds and determines that all recitals set forth in this Resolution are true and correct and fully incorporated in this Resolution.

2. Consistent with the analysis contained in the Consistency Evaluation, the environmental effects of the Affordable Project were adequately addressed in the Program FEIR, and the Affordable Project is within the scope of the development program described in the Program FEIR.

3. The Council adopts the following findings, as set forth in the Consistency Evaluation, with respect to the environmental effects of the Affordable Project:

(a) No substantial changes are proposed in the Encanto Neighborhoods Community Plan (Community Plan), or with respect to the circumstances under which it is to be undertaken as a result of the Affordable Project, which will require important or major revisions in the Program FEIR; and

(b) No new information of substantial importance to the Community Plan has become available, which was not known or could not have been known at the time the Program FEIR was certified as complete, and which shows that the Affordable Project will have any significant effects not discussed previously in the Program FEIR, or that any significant effects previously examined will be substantially more severe than shown in the Program FEIR, or that any mitigation measures or alternatives previously found not to be feasible or not previously considered would substantially reduce or lessen any significant effects on the environment; and

(c) No negative declaration, subsequent environmental impact report, or supplement or further addendum to the Program FEIR is necessary or required; and

(d) The development of the Affordable Project will have no significant effect on the environment, except as identified and considered in the Program FEIR, and no new or additional project-specific mitigation measures are required in connection with development of the Affordable Project; and

(e) The Affordable Project will not have any new effects that were not adequately covered in the Program FEIR, and therefore, the Affordable Project is within the scope of the development program approved under the Program FEIR.

4. Pursuant to CEQA Guidelines section 15168, the Council determines that no further environmental documentation is required to address the potential environmental effects of the Affordable Project.

5. The City Clerk, or designee, is directed to file a Notice of Determination with the Clerk of the Board of Supervisors for the County of San Diego regarding the Affordable Project.

6. The Council has received and heard any and all oral and written objections relating to the proposed DDA, and all such oral and written objections are overruled.

7. The Council finds that the consideration to be received by the City for the sale of the Affordable Project Property under the DDA is not less than fair reuse value at the use and with the covenants, conditions, and development costs required by the DDA.

8. The Council finds that the sale of the Affordable Project Property under the DDA will assist in the elimination of blight in the Southeastern Merged Redevelopment Project Area, and is consistent with the Redevelopment Plan and the most recent five-year implementation plan adopted pursuant to Code section 33490.

9. The Council finds that the sale of the Affordable Project Property under the DDA will assist in providing housing for low-income or moderate-income persons.

10. The Council approves the sale of the Affordable Project Property in accordance with the DDA.

11. The Council approves the DDA, including all attachments and exhibits to the DDA.

12. The Mayor, or designee, is authorized and directed to execute the DDA, including all attachments and exhibits requiring the City's signature. A copy of the DDA, when fully executed, shall be placed on file with the City Clerk as Document No. RR-312739.

13. The Mayor, or designee, is authorized and directed to sign all documents necessary and appropriate to carry out and implement the DDA and to administer the City's obligations, responsibilities, and duties to be performed under the DDA, including all attachments and exhibits.

14. Contingent upon the Comptroller first issuing a certificate stating that the funds are available, the Council authorizes the Chief Financial Officer, as delegated, to appropriate and expend an amount not to exceed $5,850,000 to fund the City Loan under the DDA, including up to $3,369,606.08 from the Housing Asset Fund, Fund No. 200708, and the Bond Proceeds, itemized as follows, with the following estimated amounts to be adjusted as needed to allow expenditure of the Bond Proceeds plus all accrued interest: (i) $368,637.66 from Centre City Redevelopment Project Area Tax Allocation Bonds, Series 2004C, Fund No. 200571; (ii) $0.08 from Centre City Redevelopment Project Area Tax Allocation Bonds, Series 2004D, Fund No. 200573; (iii) $904.70 from Centre City Redevelopment Project Area Tax Allocation Bonds, Series 2006B, Fund No. 200571; (iv) $1,104,801.01 from Centre City Redevelopment Project Area Tax Allocation Bonds, Series 2008, Fund No. 200586; (v) $135.14 from Horton Plaza Redevelopment Project Area Tax Allocation Bonds, Series 2003C, Fund No. 200572; (vi) $2,761.14 from North Bay Tax Allocation Bonds, Series 2000, Fund No. 200562; (vii) $4.94 from Central Imperial Housing Set Aside Tax Allocation Bonds, Series 2007A, Fund No.

200553; and (viii) $1,003,149.25 from Central Imperial Housing Set Aside Tax Allocation Bonds, Series 2007B, Fund No. 200557.

APPROVED: MARA W. ELLIOTT, City Attorney

By _____
Adam Wander
Deputy City Attorney

ARW:als
10/24/2019
Or.Dept: Econ Dev't
Doc. No.: 2207970

I certify that the foregoing Resolution was passed by the Council of the City of San Diego, at this meeting of NOV 05 2019.

ELIZABETH S. MALAND
City Clerk

By _____
Deputy City Clerk

Approved: 11/12/19
(date)

_____
KEVIN L. FAULCONER, Mayor

Vetoed: _____
(date)

_____
KEVIN L. FAULCONER, Mayor

CEQA CONSISTENCY EVALUATION FOR THE PROPOSED HILLTOP AND EUCLID DISPOSITION AND DEVELOPMENT AGREEMENT & PURCHASE AND SALE AGREEMENT

Prepared by:
AECOM
401 West A Street, Suite 1200
San Diego, California 92101
OCTOBER 2017

ATTACHMENT F

TABLE OF CONTENTS

LIST OF FIGURES

This page intentionally left blank.

CEQA CONSISTENCY EVALUATION

1. **PROJECT TITLE:** Hilltop and Euclid Disposition and Development Agreement (DDA) and Purchase and Sale Agreement (PSA)

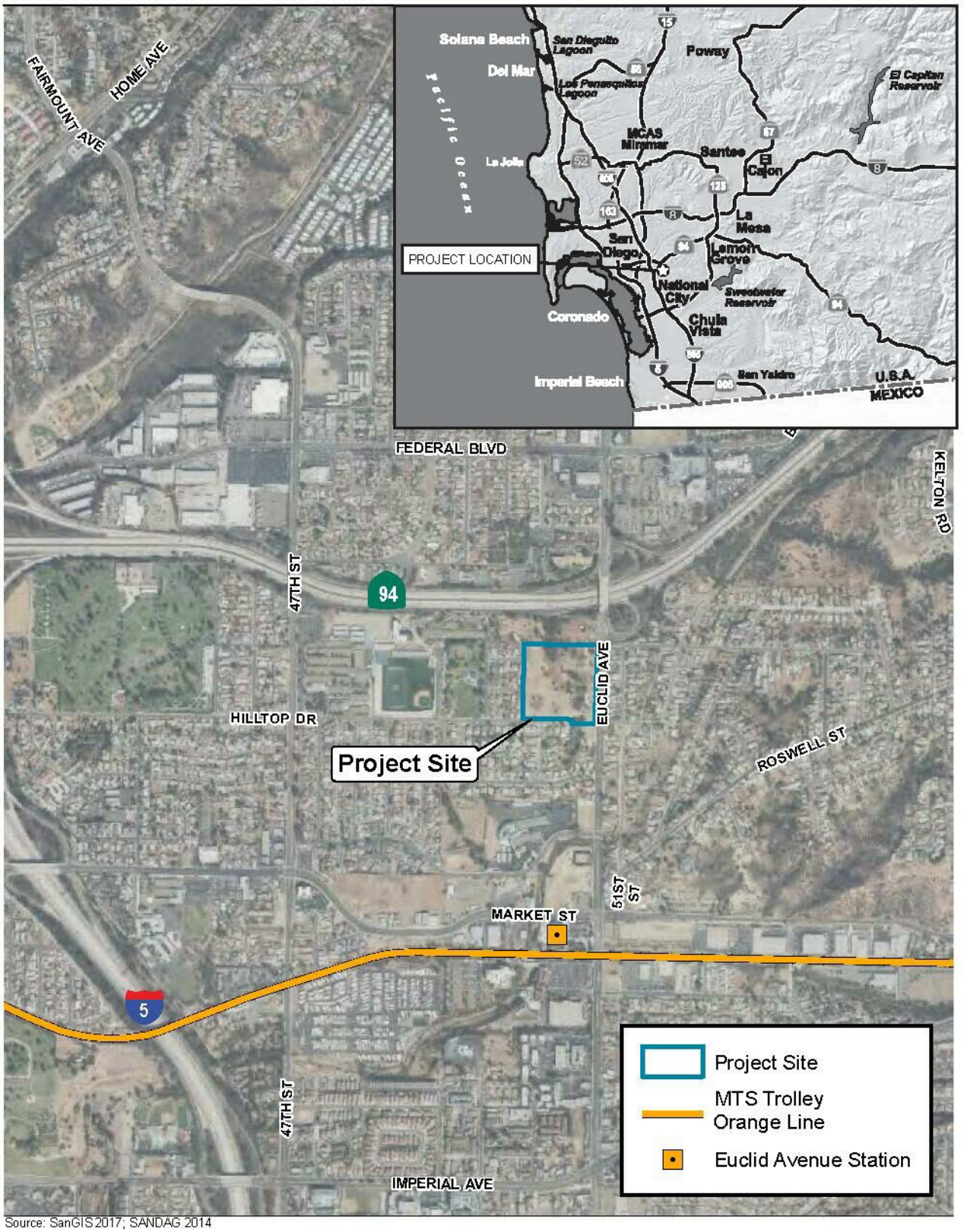
2. **APPLICANT:** Hilltop Family Housing LP (Affordable Developer) and Hilltop Encanto LLC (Market Rate Developer), on behalf of Civic San Diego

3. **PROJECT LOCATION:** The project site is located north and west of the intersection of Hilltop Drive and Euclid Avenue, east of and including the arroyo traversing the currently vacant site (Assessor's Parcel Numbers 542-480-0300, 542-480-0900, 542-480-1000, 542-480-1200, 542-480-1400, 842-480-1600, 542-480-1800, and 542-480-2000), in the Encanto Neighborhoods Community Plan Area within the City of San Diego, California (Figure 1). The project site is located in the Chollas View neighborhood and the Village at Market Creek Village District Community Plan Implementation Overlay Zone of the Encanto Neighborhoods Community Plan Area and within ½ mile of the Euclid Avenue multi-modal trolley and bus transit station. The Encanto Neighborhoods community includes approximately 3,811 acres and is located approximately 5 miles east of downtown San Diego. The community is bounded by State Route 94/Martin Luther King Jr. Freeway to the north and Interstate 805 to the west. The Mid-City community is to the north, the Southeastern San Diego community is to the west, and the Skyline-Paradise Hills community is to the southeast.

4. **PROJECT SETTING:** The Final Program Environmental Impact Report (PEIR) for the Southeastern San Diego and Encanto Neighborhoods Community Plan Updates (CPU) describes the existing setting of the Encanto Neighborhoods community (City of San Diego 2015). This description is hereby incorporated by reference.

   Located in the highly urbanized Encanto Neighborhoods community, the project site is currently vacant. Existing land uses within the vicinity of the site include Millennial Tech Middle School, Gompers Preparatory Academy, Gompers Park, and single-family residential uses to the west; Interstate 94 and San Diego Unified School District property EarthLab to the north; commercial and single-family and multi-family residential uses to the east; and single-family residential uses, Horton Elementary School, Valencia Park/Malcolm X Library, commercial uses, and the Euclid Avenue multi-modal trolley and bus transit station to the south.

   Applicable plans and policies governing the site include the Encanto Neighborhoods Community Plan and the City of San Diego Municipal Code. The Encanto Neighborhoods Community Plan establishes allowed land uses; minimum and maximum development intensities; parking requirements; building standards such as height, bulk, setbacks, and stepbacks; site coverage; vehicular circulation requirements; and other development standards. The Encanto Neighborhoods Community Plan permits residential and neighborhood mixed-use, which includes shopping and services, as well as civic uses.



Source: SanGIS 2017; SANDAG 2014

1,250 625 0 1,250 Feet

Scale: 1:15,000 ; 1 in = 1,250 feet

Figure 1
Regional Location and Vicinity

Path: \\ussdg1fp001\DATA\marketing\2017\02. RFQ, RFP & Presentations\Civic San Diego On-Call Env-CEQA Consulting Svcs\Hilltop&Euclid\GIS\Euclid_Regional.mxd, 10/6/2017, augellop

5. **PROJECT DESCRIPTION:** This California Environmental Quality Act (CEQA) Consistency Evaluation analyzes the potential environmental impacts associated with the approval of the proposed terms set forth in the DDA between the City of San Diego (Agency) and Hilltop Family Housing LP (Affordable Developer) and PSA between City of San Diego (Agency) and Hilltop Encanto LLC (Market Rate Developer). The proposed terms of the DDA and PSA are discussed in detail below. This CEQA Consistency Evaluation provides applicable information about the project site and analyzes the potential environmental impacts associated with the approval of the proposed terms of the DDA and PSA. Upon approval, future proposed projects at this site would undergo extensive design review, entitlements, and environmental analysis in addition to this study.

   The project is approval of a DDA and PSA to convey 9.38 acres of property to private developers for future construction of a mixed-use, multi-family affordable housing development and a market rate residential development (Figure 2).

   The future affordable housing development will be located east of the arroyo that bisects the project site. The development will include 113 units in three- and four-story buildings, in accordance with the current zoning of CN-1-4. The development will include approximately 145,000 square feet of residential and commercial building area, including approximately 8,485 square feet of commercial space; approximately 146 at-grade parking spaces, including 25 covered or partially covered parking spaces; and associated landscaping and public improvements. The development will also include drought-tolerant/resistant landscaping, children's play areas, a residents' garden, barbeque and picnic areas, art/mural elements, iconic neighborhood gateway signage, outdoor gathering space, pedestrian bridge, residents' community building, arroyo restoration with native plantings, trails, pedestrian-scale lighting, pocket parks, Hilltop Drive extension, and Euclid Avenue improvements, all as reflected in the final approvals to be processed for the project.

   The future market rate residential development will be located west of the arroyo that bisects the project site. The development will include two- and three-story residential structures, including 20 detached single-family homes with three and four bedrooms; off-street parking and attached two-car garages; and 27 attached townhomes with three bedrooms and attached two-car garages, as well as all other surface parking and improvements as required by the approvals, in accordance with the current zoning of RM-1-2. The development will comprise approximately 66,142 square feet of gross residential building area, approximately 126 at-grade parking spaces, and associated landscaping and public improvements. The development will include drought-tolerant/resistant landscaping, common open space areas, and private street improvements.

   Based on the land use designation in the Community Plan and zoning, the PEIR evaluated the project site with future residential and neighborhood mixed-use uses. As discussed in Chapter 5.1 of the PEIR, proposed development in the Community Plan Area was assumed to be developed at specific allowed densities and intensities to analyze expected impacts. The development assumption used for the site included the maximum density allowed within the residential medium and neighborhood mixed-use land uses. The maximum density and intensity allowed under the Community Plan and associated PEIR is 29 du/ac for RM-1-2 and 44 du/ac for CN-1-4. The DDA and PSA would develop 199,274 square feet of residential uses (RM-1-2) at 11 dwelling units per acre (du/ac) and 153,795 square feet of neighborhood mixed-use uses (CN-1-4) at 31 du/ac. As such, future development in accordance with the DDA and PSA would be less dense than that assumed under the PEIR. Therefore, future development of the project site is consistent with and less than the development capacity allowed under the Community Plan and PEIR.

Source: SanGIS 2017; SANDAG 2014

400 200 0 400 Feet

Scale: 1:4,800 ; 1 in = 400 feet

Figure 2
Project Site

Path: M:\2017\02. RFQ, RFP & Presentations\Civic San Diego On-Call Env-CEQA Consulting Svcs\Hilltop&Euclid\GIS\Euclid_Site.mxd, 10/6/2017, dugdillop

The project site is located in the Market Creek Village District and is therefore subject to Community Implementation Overlay Zone-Type A regulations. As such, future development would comply with the Supplemental Development Regulations (SDR) included in the Community Implementation Overlay Zone-Type A. As discussed in the PEIR, compliance with SDR-1 would determine if new projects are required to provide traffic improvements based on density/intensity. Compliance with SDR-2 requires the proposed development to comply with the City's Climate Action Plan (CAP) by completing a CAP Checklist, and implementing the associated greenhouse gas (GHG) reduction measures. Compliance with SDR-3 ensures that any habitable space within the development would be protected from excessive interior noise levels.

6. **CALIFORNIA ENVIRONMENTAL QUALITY ACT COMPLIANCE:** The following environmental document and its appendices, which were prepared prior to this Consistency Evaluation and are hereby incorporated by reference, included the project site within the Community Plan area analyzed:

   Final Program Environmental Impact Report (PEIR) for the Southeastern San Diego and Encanto Neighborhoods Community Plan Updates (CPUs) (State Clearinghouse No. 2014051075), certified by the City Council (Resolution No. R-310077) on December 2, 2015.

   The environmental document is available for review at the City of San Diego Planning Department, 1010 Second Avenue. Suite 1200, MS 413, San Diego, California 92101 and on the City's website at https://www.sandiego.gov/sites/default/files/legacy//planning/programs/ceqa/2015/20151006ssdandenfeir.pdf.

   This Consistency Evaluation has been prepared in compliance with Sections 15168 and 15183 of the CEQA Guidelines. Under this process, a Consistency Evaluation is prepared for each subsequent project to determine whether the potential impacts were anticipated in the PEIR. This Consistency Evaluation uses the same thresholds of significance as the PEIR prepared for the Encanto Neighborhoods Community Plan. No additional documentation is required for subsequent specific development projects if the Consistency Evaluation determines that the potential impacts have been adequately addressed in the PEIR and subsequent specific development projects implement appropriate mitigation measures identified in the Mitigation, Monitoring, and Reporting Program (MMRP) that accompanies the PEIR.

   If the Consistency Evaluation identifies new impacts or a substantial change in circumstances, additional environmental documentation is required. The form of this documentation depends upon the nature of the impacts of the specific development project being proposed. Should a proposed project result in (a) new or substantially more severe significant impacts that are not adequately addressed in the PEIR, or (b) there is a substantial change in circumstances that would require major revision to the PEIR, or (c) that any mitigation measures or alternatives previously found not to be feasible or not previously considered would substantially reduce or lessen any significant effects of the project on the environment, a Subsequent Environmental Impact Report (EIR) or Supplement to the EIR would be prepared in accordance with Sections 15162 or 15163 of the CEQA Guidelines (CEQA Statutes Section 21166). If the lead agency under CEQA finds pursuant to Sections 15162 and 15163, no new significant impacts will occur or no new mitigation will be required, the lead agency can approve the subsequent specific development project, as being within the scope of the project covered by the PEIR, and no new environmental document is required.

7. **PROJECT-SPECIFIC ENVIRONMENTAL ANALYSIS:** See Section 10, Environmental Checklist, for evaluation of environmental impacts.

8. **MITIGATION, MONITORING, AND REPORTING PROGRAM:** Any specific projects associated with implementation of the DDA and PSA will be subject to future environmental review and mitigation, as appropriate, pursuant to CEQA at the time a specific project is proposed. Mitigation may include, but is not necessarily limited to, the mitigation measures included in the MMRP as found in Chapter 11 of the PEIR.

   Some of the mitigation measures found in Chapter 11 of the PEIR are planwide and implemented on an ongoing basis regardless of whether the proposed project is enacted. Other measures are to be specifically implemented by development projects as they come forward. The project is anticipated to result in impacts that would require mitigation to reduce the impact to a less than significant level. Because of this, a project-specific mitigation monitoring and reporting program (MMRP) is identified for the DDA and PSA and is included as Appendix A of this Consistency Evaluation. The project-specific MMRP incorporates applicable mitigation measures from the PEIR.

9. **DETERMINATION:** In accordance with Sections 15168 and 15180 of the CEQA Guidelines, the potential impacts associated with future development within the Encanto Neighborhoods Community Plan Area are addressed in the PEIR prepared for the Encanto Neighborhoods Community Plan, which was certified on December 2, 2015, by the City Council.

   The previous document addresses the potential effects of future development within the Encanto Neighborhoods Community Plan Area based on buildout forecasts projected from the land use designations, density bonus, and other policies and regulations governing development intensity and density. Based on this analysis, the PEIR and its appendices concluded that future development would result in significant impacts related to the following issues (mitigation and type of impact shown in parentheses) (D = direct impact, C = cumulative impact):

   <u>Significant but Mitigated Impacts</u>

   - Land Use: Environmentally Sensitive Lands and Historical Resources (MM-LU-1a; MM-LU-1b) (D)
   - Land Use: Multi-Habitat Planning Area Land Use Adjacency Guidelines (MM-LU-2) (D)
   - Air Quality: Sensitive Receptors (MM-AQ-3; MM-AQ-4) (D/C)
   - Noise: Stationary Noise (MM-NOS-3) (D/C)
   - Noise: Construction Noise (MM-NOS-4) (D/C)
   - Biological Resources: Sensitive Species (MM-BIO-1) (D)
   - Biological Resources: Wetlands (MM-BIO-2) (D)
   - Biological Resources: Migratory Wildlife (MM-BIO-3) (D)
   - Biological Resources: Multiple Species Conservation Plan (MM-BIO-1 and MM-LU-2) (D)
   - Biological Resources: Multi-Habitat Planning Area (MM-LU-2) (D)
   - Hydrology and Water Quality: Adverse Effect (MM-HYD-WQ-1) (D)
   - Hydrology and Water Quality: Increased Runoff (MM-HYD-WQ-1) (D)
   - Hydrology and Water Quality: Increased Pollutant Discharges (MM-HYD-WQ-2) (D)
   - Historical Resources: Alteration of a Prehistoric or Historic Building, Structure, Object, or Site (MM-HIST-1; MM-HIST-2) (D)
   - Historical Resources: Impact on Religious or Sacred Uses or the Disturbance of Human Remains (MM-HIST-1) (D)
   - Paleontological Resources: Impact on Paleontological Resources (MM-PALEO-1) (D)
   - Geology and Seismic Hazards: Exposure to Geologic Hazards (MM-GEO-1) (D)

- Geology and Seismic Hazards: Increased in Wind of Water Erosion of Soils (MM-GEO-2) (D)

Significant and Not Mitigated Impacts

- Transportation: Impact on Roadways and Intersections (CPU policies) (D/C)
- Transportation: Impact on Freeway Segments, Interchanges, and Ramps (CPU policies) (D/C)
- Transportation: Impact on Existing or Planned Transportation System (CPU policies) (D/C)
- Air Quality: Air Quality Plan (CPU policies) (D/C)
- Air Quality: Ozone (MM-AQ-1; MM-AQ-2) (D/C)
- Noise: Vehicle Traffic Noise (MM-NOS-1; MM-NOS-2) (D/C)
- Noise: Increase in Ambient Noise Levels (MM-NOS-1; MM-NOS-2) (D/C)

In certifying the PEIR and approving the Encanto Neighborhoods Community Plan, the City of San Diego adopted a Statement of Overriding Considerations, which determined that the unmitigated impacts were acceptable in light of economic, legal, social, technological, or other factors, including the following:

Overriding Considerations

- The CPUs will provide comprehensive guides for growth and development in the Southeastern San Diego and Encanto Neighborhoods communities.
- The CPUs implement the General Plan's City of Villages Strategy by providing balanced land use plans that meet the needs of the Southeastern San Diego and Encanto Neighborhoods communities.
- Plan adoption and implementation will support the City of Villages strategy through the implementation of additional housing and mixed uses near job/employment centers.
- The CPUs provides more effective means to protect and enhance character and function than existing land use controls.
- The CPU promotes the City's Complete Streets policy by restoring a more balanced street environment that prioritizes public transit, walking, and bicycling over private vehicle movement.
- The CPU implements the City's goal to incorporate its General Plan policies and goals into its neighborhoods as part of its long-term community plan update process.

The proposed activity analyzed within this Consistency Evaluation is covered under the PEIR for the Encanto Neighborhoods Community Plan, which was certified by the City Council by Resolution R-310077 on December 2, 2015, and MMRP of the PEIR for the Encanto Neighborhoods Community Plan.

This activity is adequately addressed in the environmental document noted above and the Consistency Evaluation prepared for this project reveals there is no change in circumstance, additional information, or project changes to warrant additional environmental review. Because the prior environmental document adequately covered this activity as part of the previously approved project, this activity is not a separate project for purposes of review under CEQA pursuant to CEQA Guidelines Sections 15060(c)(3), 15180, and 15378(c).

Environmental Conclusions: Based on the evaluation summarized above, it is concluded that:

- Development in accordance with the DDA and PSA is consistent with the land use assumed for the property by the PEIR, and that no changes to the CPU are required;
- Development in accordance with the DDA and PSA will not affect the analysis and conclusions of the PEIR because future development would be consistent with the land use type and intensity assumed for the subject property in the PEIR;
- Development in accordance with the DDA and PSA will not result in any significant impacts not considered in the PEIR, nor will it increase the severity of significant impacts which were identified in the PEIR;
- No change in circumstances has occurred since the PEIR was certified which affect its applicability to the project; and
- No new information of substantial importance has come to light since the PEIR was certified which affects its applicability to the project.

Therefore, staff has determined that approval of the DDA and PSA may rely on the PEIR to satisfy CEQA.

Signature of Lead Agency Representative	October 23, 2017 Date
Signature of Preparer	October 23, 2017 Date

10. **ENVIRONMENTAL CHECKLIST:** This environmental checklist evaluates the potential environmental effects of the proposed project consistent with the significance thresholds and analysis methods contained in the PEIR for the Encanto Neighborhoods Community Plan. Based on the assumption that the proposed activity is adequately addressed in the PEIR, the environmental checklist table indicates how the impacts of the proposed activity relate to the conclusions of the PEIR. As a result, the impacts are classified into one of the following categories:

    - Significant and Not Mitigated (SNM)
    - Significant but Mitigated (SM)
    - Not Significant (NS)

    The checklist summarizes the potential impacts of approving the DDA and PSA for the future mixed-use, multi-family affordable housing development and market rate residential development. The checklist identifies each potential environmental effect and provides information supporting the conclusion drawn as to the degree of impact associated with the proposed project when compared to the PEIR. *Note: The impact conclusion (in bold and italic text) that follows each threshold question reflects the impact conclusion as analyzed in the PEIR.*

    As discussed in the project description, approval of the DDA and PSA would convey 9.38 acres of property to private developers for future construction of a mixed-use, multi-family affordable housing development and a market rate residential development. The project is covered by the PEIR and the development capacity assumed for the Encanto Neighborhoods community and the project site. Future development of the project site is consistent with and less than the development capacity allowed under the Community Plan and PEIR. Therefore, no impacts beyond those analyzed in the PEIR are expected to occur.

Issues and Supporting Information		Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
		Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
I.	LAND USE						
(a)	**Conflict with the environmental goals, objectives, or guidelines of the general plan, community plan, or other applicable land use plans?** ***No Impact.*** The PEIR concluded that implementation of the CPU would not result in impacts related to conflicts with the environmental goals, objectives or guidelines of the general plan, community plan, or other applicable land use plan (Impact 5.1-1). Development of the project site in accordance with the DDA and PSA would not allow for an increase in density or intensity of development, or allow substantially different types or intensity of development on the project site other than those assumed in the Encanto Neighborhoods Community Plan (Community Plan) and the PEIR. As discussed in the project description, the development density and intensity allowed under the DDA and PSA would be less than the density and intensity proposed under the Community Plan buildout scenario. The project is consistent in land use and intensity with the General Plan City of Villages Strategy and the Community Plan. As the project is consistent with the General Plan and Community Plan, the project would also be consistent with various regional plans, such as San Diego Association of Governments' (SANDAG's) Regional Plan, SANDAG's 2050 Regional Transportation Plan, and local plans. As discussed in the project description, the project would consist of the approval of a DDA and PSA to convey the project site to private developers for future construction of a mixed-use, affordable housing development and a market rate residential development. The project would not change the limits of development allowed on the project site and would be consistent with the Community Plan and the associated PEIR. No mitigation is required.					**X**	**X**

Issues and Supporting Information	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
(b) **Conflict with the purpose and intent of the Historical Resources Regulations and the Environmentally Sensitive Lands Regulations?** ***Less than Significant with Mitigation.*** The PEIR identified potentially significant conflicts of future development with respect to the City's Environmentally Sensitive Lands (ESL) Ordinance due to the potential for development into areas identified as environmentally sensitive, including sensitive biological resources, historical resources, steep slopes, and floodplains (Impact 5.1-2). The PEIR acknowledged that compliance with the requirements of the ESL Ordinance, including securing a site development permit for encroachment into environmentally sensitive lands, would reduce potential impacts. Furthermore, implementation of biological resource mitigation measures requiring mitigation for encroachment into sensitive biological resources or historical resources would reduce impacts of future development within the CPU. Development of the project site in accordance with the DDA and PSA was determined to not result in any new or more severe impacts on ESL or other conservation policies. As indicated earlier, the project site is vacant. The project site contains steep slopes as 1.83 acres of the project site in the area of the existing arroyo have a slope greater than 25 percent. Generally, the steep hillside regulations of the ESL Ordinance are applicable when development is proposed on a site containing any portions with a natural gradient of at least 25 percent (25 feet of vertical distance for every 100 feet of horizontal distance) and a vertical elevation of at least 50 feet (City of San Diego 2004). Additionally, an arroyo bisects the project site which is considered a potential jurisdictional wetland/water. As such, future development of the project site would be required to comply with the ESL Ordinance, the City of San Diego Biology Guidelines and the MSCP Subarea					**X**	**X**

Issues and Supporting Information		Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
		Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
	Plan to reduce impacts. Implementation of PEIR Mitigation Measure LU-1a would reduce impacts to less than significant (see Appendix A).						
(c)	**Conflict with the provision of the City's Multiple Species Conservation Program Subarea Plan or approved local, regional, or state habitat conservation plan?** ***Less than Significant with Mitigation.*** The PEIR identified potentially significant impacts of future development on land designated as Multi-Habitat Plan Area (MHPA) by the City's Multiple Species Conservation Plan (MSCP) (Impact 5.1-3). The impacts were associated with indirect impacts on vegetation and wildlife in MHPAs which are adjacent to future development. Future development adjacent to an MHPA would be required to evaluate the development pursuant to the Land Use Adjacency Guidelines specified in the MSCP Subarea Plan. Subsequent development would be required to implement measures to avoid significant impacts to the MHPA, including buffers, barriers, and light shielding to reduce indirect impacts. Development of the project site in accordance with the DDA and PSA was determined to not result in any new or more severe impacts on land designated as MHPA because the project site is not located within or adjacent to the MHPA. No mitigation is required.					**X**	**X**
(d)	**Result in land uses which are not compatible with an adopted Airport Land Use Compatibility Plan?** ***No Impact.*** The PEIR concluded no impacts associated with incompatible land uses under an adopted Airport Land Use Compatibility Plan (ALUCP) would occur (Impact 5.1-4). The project site is located within Review Area 2 of the San Diego International Airport (SDIA) Airport Influence Area and is therefore subject to the SDIA ALUCP. Airspace protection and overflight policies and standards apply to Review Area 2. The City requires a Federal Aviation Administration					**X**	**X**

Issues and Supporting Information		Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
		Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
	determination of no hazard to air navigation for both ministerial and discretionary projects prior to approving or recommending approval as addressed in Development Services Department Information Bulletin 520. Additionally, an overflight notification agreement must be recorded with the Office of the County Recorder for any new dwelling unit within the overflight area. Furthermore, the proposed development of residential and commercial uses would conform to the assumptions of the PEIR and would not result in the location of uses that would be incompatible with the adopted ALUCP. Thus, the project would not affect the conclusion of the PEIR that future development would not conflict with the ALUCP. No mitigation is required.						
II.	**TRANSPORTATION**						
(a)	**Result in an increase in projected traffic which is substantial in relation to the existing traffic load and capacity of the street system? *Significant and Unavoidable.*** The PEIR concluded that implementation of the CPU would result in significant impacts on the capacity of surface roads and freeways serving the community (Impacts 5.2-1, 5.2-2 and 5.2-3). These impacts were related to an increase in projected traffic which would be substantial in relation to the existing traffic load and capacity of the streets and freeways. Mitigation measures, including potential street and intersection improvements (e.g., widening, restriping, and roadway diet), were identified in the Traffic Impact Study (TIS) for the PEIR. Although implementation of the improvements identified in the TIS would have substantially reduced traffic congestion, several of the improvements were rejected as mitigation because they would be inconsistent with the Community Plan Mobility Element. For example, extensive road widening could impact sidewalk access and reduce walkability of the neighborhood. Development of the project site in accordance with the DDA and PSA was determined to not result in any new					**X**	**X**

Issues and Supporting Information		Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
		Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
	or more severe impacts to the local roadway network or freeway system. As discussed in the project description, future development would be required to comply with SDR-1 of the CPIOZ-A which would limit development on the site to no more than 1,000 ADT. A traffic study would be required to demonstrate that the proposed development would not exceed 1,000 ADT. If this trip limit were exceeded, the proposed development would be subject to additional traffic analysis and CEQA review. No mitigation is required.						
(b)	**Result in the addition of a substantial amount of traffic to a congested freeway segment, interchange, or ramp? *Significant and Unavoidable.*** As discussed above in Section II (a), the PEIR concluded that implementation of the CPU would result in significant impacts on the capacity of surface roads and freeways serving the community (Impacts 5.2-1, 5.2-2 and 5.2-3). Development of the project site in accordance with the DDA and PSA was determined to not result in any new or more severe impacts to the local roadway network or freeway system. As discussed in the project description, future development would be required to comply with SDR-1 of the CPIOZ-A which would limit development on the site to no more than 1,000 ADT. A traffic study would be required to demonstrate that the proposed development would not exceed 1,000 ADT. If this trip limit were exceeded, the proposed development would be subject to additional traffic analysis and CEQA review. No mitigation is required.					**X**	**X**
(c)	**Have a substantial impact upon existing or planned transportation systems? *Significant and Unavoidable.*** As discussed above in Sections II (a) and II (b), the PEIR concluded that implementation of the CPU would result in significant impacts on the capacity of surface roads and freeways serving the community (Impacts 5.2-1, 5.2-2 and 5.2-3). Development of the project site, in accordance with the					**X**	**X**

Issues and Supporting Information		Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
		Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
	DDA and PSA, was determined to not result in any new or more severe impacts to the existing or planned transportation system. As discussed in the project description, future development would be required to comply with SDR-1 of the CPIOZ-A which would limit development on the site to no more than 1,000 ADT. A traffic study would be required to demonstrate that the proposed development would not exceed 1,000 ADT. If this trip limit were exceeded, the proposed development would be subject to additional traffic analysis and CEQA review. No mitigation is required.						
(d)	**Result in substantial alterations to present circulation movements including effects on existing public access areas?** ***Less than Significant.*** The PEIR concluded that implementation of the CPU would result in less than significant impacts related to substantial alterations to present circulation movements including effects on existing public access areas (Impact 5.2-4). Development of the project site in accordance with the DDA and PSA was determined to not result in any new or more severe impacts to existing public access points. Future development of the project would extend Hilltop Drive to Euclid Avenue and includes Euclid Avenue improvements and a four-way signalization at the future Hilltop Drive and Euclid Avenue intersection, as reflected in the DDA. The project is also located approximately 0.3 mile from the Euclid Avenue multi-modal trolley and bus transit station. As such, future development of the project site is expected to result in improved access for transit users and pedestrians in the Community Plan Area. Temporary closures with detours may be required when street improvements are being constructed, but would be addressed through a traffic control plan in accordance with City policy. No mitigation is required.					**X**	**X**
(e)	**Conflict with adopted policies, plans or programs supporting alternative transportation modes?** ***Less than Significant.*** The PEIR concluded that implementation of the CPU would result in less than					**X**	**X**

Issues and Supporting Information	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
significant impacts related to conflicts with adopted policies, plans, or programs supporting alternative transportation modes (Impact 5.2-5). The PEIR would not conflict with adopted policies, plan, or programs supporting alternative transportation modes. In fact, future development at the project site would be located approximately 0.3 mile from the Euclid Avenue multi-modal trolley and bus transit station. As reflected in the DDA, future development of the project site would also implement sidewalk improvements on Euclid Avenue. No mitigation is required.						
III. AIR QUALITY						
(a) **Conflict or obstruct the implementation of the applicable air quality plan?** ***Significant and Unavoidable.*** The PEIR concluded that total air emissions related to development pursuant to the Community Plan would be greater than the total emissions under the previously adopted Community Plan for reactive organic gases (ROG), which are considered the chief precursors of ozone. As a result, emissions of ROG would be greater than what is accounted for in the adopted Regional Air Quality Strategy (RAQS). Therefore, the PEIR concluded that the CPU would conflict with implementation of the RAQS (Impact 5.3-1), and would have a potentially significant impact on regional air quality because the current RAQS were based on a previous land use plan. Since revisions can only be made by SANDAG and the San Diego Air Pollution Control District (SDAPCD), no mitigation was determined to be within the control of the City. Development of the project site pursuant to the limits of the DDA and PSA was determined to not result in any new or more severe impacts on regional air quality planning than identified in the PEIR. As discussed in the project description, the PEIR assumed that the project site would be developed at maximum density					**X**	**X**

Issues and Supporting Information	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
and intensity with 199,247 square feet of residential development (29 du/ac; RM-1-2) and 153,795 square feet of neighborhood mixed-use development (44 du/ac; CN-1-4), which would include ground floor retail with residential units above. The development capacity of the DDA and PSA is less than the development capacity assumed in the PEIR as the project would include 11 du/ac for RM-1-2 zone and 31 du/ac for CN-1-4 zone. As discussed earlier, future development would require consistency with the residential and neighborhood mixed-use designations and zones that apply to the property. Therefore, since the PEIR based its analysis of air quality impacts on the level of development that would ultimately be allowed on the site, no new impacts would occur and would likely result in less impacts than assumed under the PEIR. No mitigation is required as the only measure that can lessen this effect is the revision of the RAQS based on the revised CPU. This effort is the responsibility of SANDAG and SDAPCD and outside the jurisdiction of the City and the project developer.							
(b) **Result in a violation of any air quality standard or contribute substantially to an existing or projected air quality violation?** ***Significant and Unavoidable.*** As discussed in the PEIR, the San Diego Air Basin is not in attainment for ozone, PM_{10}, and $PM_{2.5}$. Construction could potentially contribute to localized violations, and operational emissions could potentially contribute to regional violations (Impact 5.3-2). Mitigation measures require future projects that would exceed daily construction emissions thresholds established by the City of San Diego to incorporate best available control measures/technology to reduce construction emissions to below daily emission standards established by the City of San Diego. Development that would significantly impact air quality, either individually or cumulatively, would be approved only if it is conditioned with all reasonable mitigation to avoid, minimize, or offset the impact. However, development of the project site in accordance					**X**	**X**

Issues and Supporting Information	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
with the DDA and PSA was determined to not result in any new or more severe impacts related to ozone. As a component of the air quality analyses in the PEIR, an air quality model was used to evaluate the potential emissions resulting from expected land development projects. Mobile-source air emissions related to development of the project site were also assumed in the PEIR analysis. As discussed above in the project description and in Section III (a), the development capacity of the DDA and PSA is less than the development capacity assumed in the PEIR as future development proposed under the DDA and PSA includes less dwelling units per acre than assumed under the maximum buildout scenario used for analysis in the PEIR. As discussed in the PEIR, future projects that conform to the Community Plan could contribute to cumulatively considerable emissions if multiple projects are implemented simultaneously and operational emissions could potentially contribute to regional violations. Development on the site would be required to implement applicable air emission controls during construction. Implementation of PEIR Mitigation Measure AQ-1 and AQ-2 would minimize, but may not fully mitigate, this potential impact (see Appendix A).							
(c) **Expose sensitive receptors to substantial pollutant concentrations, including toxins?** ***Less than Significant with Mitigation.*** The PEIR indicates that implementation of the Community Plan could result in a potentially significant impact from exposing sensitive receptors to substantial emissions of carbon dioxide or diesel particulate matter from traffic or general pollution from stationary sources (Impact 5.3-3). Development of the project site in accordance with the DDA and PSA was determined to not result in any new or more severe air pollutant impacts on sensitive receptors. As discussed earlier, the PEIR air quality analysis assumed that the property would be developed with residential and commercial land uses. Furthermore, as noted in the PEIR, future uses which					**X**	**X**

Issues and Supporting Information		Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
		Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
	may involve air pollutants would require permits from SDAPCD. Implementation of PEIR Mitigation Measure AQ-3 and AQ-4 would reduce impacts to sensitive receptors to less than significant (see Appendix A).						
(d)	**Result in a substantial alteration of air movement in the area of the project? *Less than Significant.*** The PEIR concluded implementation of the CPU would not result in the substantial alteration of air movement (Impact 5.3-4) as future development would be similar in height, bulk, and scale to the existing conditions in the heavily developed area. The Community Plan Area is heavily developed. Future development of the project site would be relatively small in terms of land area (approximately 9 acres) and would develop residential and commercial uses near Interstate 94. Future development of the project, in accordance with the DDA and PSA, is expected to be similar in height, bulk, and scale to existing development in the Community Plan Area and therefore would not substantially change air movement. No mitigation is required.					X	X
IV.	**NOISE**						
(a)	**Result in the exposure of people to future transportation noise levels which exceed the land use compatibility standards established in the General Plan? *Significant and Unavoidable.*** The PEIR indicates that traffic noise levels at existing and proposed residential use areas closest to the freeways and heavily traveled roadways would exceed the City's compatibility thresholds for residential land uses (Impact 5.4-1). The PEIR identifies mitigation measures that would require a project-specific noise study if required to determine the noise attenuation measures needed to achieve the noise levels specified in the Noise Element and implement the necessary attenuation. In addition, the PEIR concludes that buildout of the Community Plan Area will result in substantial traffic noise increases on					X	X

Issues and Supporting Information		Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
		Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
	several street segments. Particularly, future traffic noise contours on Euclid Avenue in the vicinity of the project site exceed 75 dBA Community Noise Equivalent Level (CNEL). Development of the project site in accordance with the DDA and PSA was determined to not result in any new or more severe traffic noise impacts than those identified in the PEIR as the future traffic noise on Euclid Avenue was identified in the PEIR. As noted in the PEIR, development of the project site would require a project-specific noise study to determine and implement the noise attenuation measures needed to achieve the noise levels specified in the Noise Element. Implementation of PEIR Mitigation Measure NOS-1 and NOS-2 would minimize, but may not fully mitigate, this potential impact (see Appendix A).						
(b)	**Result in or create a significant increase in the existing ambient noise levels?** ***Significant and Unavoidable.*** As discussed above in Section IV (a), future traffic noise contours on Euclid Avenue in the vicinity of the project site exceed 75 dBA CNEL (Impact 5.4-2). As such and as discussed in the PEIR, development would require a project-specific noise study to incorporate feasible mitigation measures to mitigate vehicle traffic noise. Implementation of PEIR Mitigation Measure NOS-1 and NOS-2 would minimize, but may not fully mitigate, this potential impact (see Appendix A).					**X**	**X**
(c)	**Result in the exposure of people to noise levels which exceed standards established in the Noise Abatement and Control Ordinance?** ***Less than Significant with Mitigation.*** As discussed in the PEIR, mixed-use sites and areas where residential uses are located in proximity to commercial sites could result in an exposure of sensitive receptors to noise levels in excess of limits established in the Noise Abatement and Control Ordinance (Impact 5.4-3). Noise conflicts between commercial and residential could occur because of traffic, mechanical equipment, deliveries,					**X**	**X**

Issues and Supporting Information	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
trash-hauling activities, and customer and employee use of commercial facilities. City noise policies as contained in the General Plan and Noise Abatement and Control Ordinance include policies and regulations that require noise studies for land uses proposed for potentially incompatible locations, limits on hours of operation, a limit on truck idling time, and enclosures for external equipment that are adjacent to residential uses. Construction noise would also be regulated by the City through enforcement of noise ordinance standards and imposition of conditions of approval for building or grading permits. Development of the project site in accordance with the DDA and PSA was determined to not result in any new or more severe stationary noise impacts on sensitive noise receptors. As required by the Noise Abatement and Control Ordinance, commercial uses on the project site would be required to reduce noise levels at common property lines with sensitive receptors. Development on the project site would require a project-specific noise study to incorporate feasible mitigation measures to limit noise exposure to sensitive receptors. Implementation of PEIR Mitigation Measure NOS-3 and NOS-4 would reduce impacts related to noise levels that exceed standards to less than significant (see Appendix A).							
V. **BIOLOGICAL RESOURCES**						
(a) **Result in a substantial adverse impact either directly or through habitat modifications (including Tier I, II, IIIA, or IIIB Habitats as identified in the Biology Guidelines of the Land Development manual), on any species identified as a candidate, sensitive, or special status species in the MSCP or other local or regional plans, policies, or regulations, or by the CDFW or USFWS? *Less than Significant with Mitigation.*** Sensitive plant and wildlife species exist in the Community Plan Area; however, the PEIR did not identify any existing sensitive species or					**X**	**X**

Issues and Supporting Information	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
vegetation communities on or adjacent to the project site. There is no MHPA land within the project site or adjacent to the project site. There is potential for future development of the project site to impact migratory birds and active nests as a result of brush removal, grading, and construction, which could result in displacement (Impact 5.5-1). The PEIR identified a number of mitigation measures aimed at reducing impacts on sensitive species. Whenever future development could impact a sensitive biological resource, the PEIR requires a site-specific study to determine the degree of impact and identify appropriate mitigation measures. Mitigation measures for sensitive species included resource avoidance, restoration or creation of habitat, and/or dedication or acquisition of habitat. Development of the project site, in accordance with the DDA and PSA, was determined to not result in any new or more severe impacts on sensitive species. There is no existing sensitive plant or wildlife species on the project site as indicated on Figure 5.5-2 and the site is classified as urban/developed land. Projects that have the potential to adversely impact sensitive species are required to prepare a project-specific biological resource report in accordance with City of San Diego Biology Guidelines and the MSCP Subarea Plan. See Section V (b) below for discussion of the on-site arroyo. Implementation of PEIR Mitigation Measure BIO-1 would reduce sensitive species impacts to less than significant (see Appendix A).							
(b) **Result in a substantial adverse impact on wetlands (including, but not limited to, marsh, vernal pool, riparian, etc.) through direct removal, filling, hydrological interruption, or other means?** ***Less than Significant with Mitigation.*** An arroyo bisects the project site and is identified as a potentially jurisdictional wetland/water (Impact 5.5-2) in the PEIR. However, future development of the project site would include restoration of the arroyo with native plantings,					**X**	**X**

Issues and Supporting Information	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
which would limit potential impacts. Regardless, future development at the project site has the potential to result in impacts to habitat and drainages that are under the jurisdiction of the U.S. Army Corps of Engineers in accordance with Section 404 of the Clean Water Act (CWA), Regional Water Quality Control Board in accordance with Section 401 of the CWA, and California Department of Fish and Wildlife under Section 1600 of the Fish and Game Code. The PEIR identified mitigation measures for impacts to wetlands including a combination of habitat creation, restoration, and enhancement at specific ratios. Development of the project site, in accordance with the DDA and PSA, was determined to not result in any new or more severe impacts on wetlands. As described above, the site was expected to be developed with residential and commercial uses for the PEIR impact analysis. While the site contains a potentially jurisdictional wetland/water, project-specific surveys would be conducted to verify the presence of jurisdictional wetlands/waters and incorporate any necessary mitigation measures to limit potential impacts. This is consistent with the requirements of the PEIR. Thus, no new impacts to wetlands would occur. Implementation of PEIR Mitigation Measure BIO-2 would reduce wetland impacts to less than significant (see Appendix A).							
(c) **Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, including linkages identified in the MSCP Plan, or impede the use of native wildlife nursery sites? *Less than Significant with Mitigation.*** As discussed above and in the PEIR, future development of the project has the potential to impact active nests of migratory bird species; however, the canyons and water courses in the vicinity of the project site are not anticipated to function as significant regional or local wildlife movement corridors for large					**X**	**X**

Issues and Supporting Information	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
mammals (Impact 5.5-3). In addition, many of the canyon areas and water courses are included in the adopted MHPA and existing conserved land, and open space and would continue to be preserved regardless of the project. Consistent with the PEIR, projects that have the potential to interfere with the nesting, foraging, or movement of wildlife species are required to prepare a project-specific biological resource report in accordance with City of San Diego Biology Guidelines and the MSCP Subarea Plan. Implementation of PEIR Mitigation Measure BIO-3 would reduce migratory species impacts to less than significant (see Appendix A).						
(d) **Result in a conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state habitat conservation plan, either within the MSCP plan area or in the surrounding region?** ***Less than Significant with Mitigation.*** The PEIR identified potentially significant impacts with respect to the City of San Diego's MSCP (Impacts 5.5-4). Development of the project site in accordance with the DDA and PSA was determined to not result in any new or more severe impacts that would conflict with an adopted habitat conservation plan, natural conservation community plan, or the City's MSCP. As discussed in Section V (b), future development of the project site has the potential to result in temporary and permanent impacts on wetlands as discussed above. However, consistent with the PEIR, project-specific surveys would also be conducted to verify the presence of jurisdictional wetlands and waters occurring on individual properties and to determine the extent of any potential impacts when development is proposed. Implementation of PEIR Mitigation Measure BIO-1 would reduce impacts related to conflicts with the					**X**	**X**

Issues and Supporting Information		Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
		Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
	MSCP to less than significant (see Appendix A).						
(e)	**Introduce land use within an area adjacent to the MHPA that would result in adverse edge effects?** ***Less than Significant with Mitigation.*** As discussed in Section I (c), there is no MHPA land within the project site or adjacent to the project site. Development of the project site in accordance with the DDA and PSA was determined to not result in any new or more severe impacts on the MHPA. No mitigation is required.					**X**	**X**
VI.	**HYDROLOGY AND WATER QUALITY**						
(a)	**Result in a substantial increase in impervious surfaces and associated increased runoff?** ***Less than Significant with Mitigation.*** The PEIR identified impacts related to hydrology due to increased runoff and impacts related to water quality due to increased runoff and pollutant discharges (Impacts 5.6-1, 5.6-2, and 5.6-3). Increased impermeable surface area resulting from new development was determined to increase the amount of stormwater entering the drainage system serving the community. In some cases, the increase may exceed the capacity of the drainage system to transport storm water resulting in flooding. Increased development and storm water flow would also increase the amount of pollutants entering the drainage system, and also increase erosion and sedimentation. The PEIR identifies mitigation measures that require future projects to be sited and designed to minimize impacts on absorption rates, drainage patterns, and surface runoff rates and floodwaters in accordance with current regulations imposed by the City and San Diego Regional Water Quality Control Board (RWQCB). Development of the project site in accordance with the DDA and PSA was determined to not result in any new or more severe impacts related to runoff and water quality. Furthermore, development is required to comply with the National Pollutant Discharge Elimination System (NPDES) permit requirements and					**X**	**X**

Issues and Supporting Information	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
the City of San Diego's Storm Water Standards. Implementation of PEIR Mitigation Measure HYD/WQ-1 would reduce runoff and water quality impacts to less than significant (see Appendix A).						
(b) **Result in substantial alteration to on- and off-site drainage patterns due to changes in runoff flow rates or volumes?** ***Less than Significant with Mitigation.*** The PEIR identified impacts related to hydrology due to increased runoff and impacts related to water quality due to increased runoff and pollutant discharges (Impacts 5.6-1, 5.6-2, and 5.6-3). Development of the project site in accordance with the DDA and PSA was determined to not result in any new or more severe impacts related to runoff and water quality. On-site or off-site alterations due to changes in runoff flow rates or volumes can occur due to increases in runoff discharge rates and durations and contribute to downstream indirect impacts. To mitigate potential impacts on downstream receiving waters, future development of the project site consistent with the DDA and PSA would be required to comply with the City Storm Water Standards. As a part of the City requirements and obligations under the Municipal Storm Water Permit, projects that trigger priority project requirements would be required to address the hydromodification requirements. For applicable projects, hydromodification design features would reduce flow-duration impacts to downstream receiving waters. Implementation of PEIR Mitigation Measure HYD/WQ-1 would reduce runoff impacts to less than significant (see Appendix A).						X	X
(c) **Result in an increase in pollutant discharge to receiving waters and increased discharge of identified pollutants to an already impaired water body?** ***Less than Significant with Mitigation.*** As discussed in the PEIR, the Regional MS4 Permit requires all development projects to implement storm water source control, and site design and treatment control practices to minimize the generation of					X	X

Issues and Supporting Information		Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
		Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
	pollutants. The permit also requires new development that exceeds certain size thresholds to implement Structural Storm Water Best Management Practices (BMPs) to reduce pollutant loads in storm water runoff and control runoff volume. Development of the project site in accordance with the DDA and PSA was determined to not result in any new or more severe impacts related to runoff and water quality. Implementation of PEIR Mitigation Measure HYD/WQ-2 would reduce pollutant discharge impacts to less than significant (see Appendix A).						
(d)	**Otherwise impact local and regional water quality, including groundwater?** ***Less than Significant.*** The PEIR identified impacts related to regional water quality, including groundwater, as less than significant (Impacts 5.6-4). The RWQCB administers the NPDES Regional MS4 Permit and the General Construction Permit which require water quality protection measures during project construction and operation. Additionally, the City of San Diego Storm Water Standards Manual provides guidance on required water quality improvements for new development, and the required construction BMPs to protect surface water and groundwater beneficial uses. Development of the project site in accordance with the DDA and PSA was determined to not result in any new or more severe impacts to water quality. Development is required to comply with the Storm Water Standards Manual to provide guidance on the required water quality improvements for new development project and the required construction BMPs. No mitigation is required.					**X**	**X**
(e)	**Expose people or structures to a significant risk of loss, injury, or death involving flooding, as a result of dam failure or levee failure?** ***Less than Significant.*** Impacts associated with exposing people or structures to risk of loss, injury, or death involving					**X**	**X**

Issues and Supporting Information	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
flooding, were less than significant (Impact 5.6-5). As discussed in the PEIR, compliance with the City of San Diego's floodplain regulations would be required for future development. Additionally, the Community Plan Area does not contain major dams or levees that would potentially cause flooding in the event of a structural failure. The project site is not located within a 100-year floodway, 100-year floodplain, or 500-year floodplain. As such, development of the project site, in accordance with the DDA and PSA, was determined to not result in any new or more severe impacts to flooding. No mitigation is required.						
VII. **HISTORICAL RESOURCES**						
(a) **An alteration, including the adverse physical or aesthetic effects and/or the destruction of a prehistoric or historic building (including an architecturally significant building), structure, object or site? *Less than Significant with Mitigation.*** The PEIR determined that future development pursuant to the CPU could impact significant pre-historic and/or historic resources (Impact 5.7-1). Alteration of historic structures could have adverse impacts on their historical value. Excavation to prepare sites for development could impact pre-historic resources on or below the ground surface. The PEIR includes mitigation measures that require the identification of any archaeological resources on a project site, and the designation of appropriate mitigation for any significant resource which may be impacted by development activity in accordance with the City's Historical Resources Regulations and Historical Resources Guidelines. Recovery of significant pre-historic or historic resources would be required by a qualified archaeologist. The project site is vacant and not known to contain historic buildings, structure, or object; however, as					**X**	**X**

Issues and Supporting Information	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
noted in the PEIR, there is potential for archaeological resources along Chollas Canyon and other waterways, such as the arroyo that bisects the project site. The City of San Diego General Plan, combined with federal, state, and local regulations, provides a regulatory framework for developing project-level historical resource mitigation for future discretionary projects. Development projects with the potential to affect archaeological sites are subject to site-specific review in accordance with the City's Historical Resources Regulations and Historical Resource Guidelines, through the discretionary process. Development of the project site, in accordance with the DDA and PSA, was determined to not result in any new or more severe impacts related to historical resources. Implementation of PEIR Mitigation Measure HIST-1 would reduce historic resource impacts to less than significant (see Appendix A).							
(b) **Result in an impact on existing religious or sacred uses within the potential impact area? *Less than Significant with Mitigation.*** Impacts on existing religious or sacred uses or the disturbance of any human remains were also identified by the PEIR as potentially significant (Impact 5.7-2). Mitigation measures require the presence of a Native American observer for all subsurface investigations, including geotechnical testing and other ground-disturbing activities, whenever a Native American Traditional Cultural Property or any archaeological site may be impacted. Development of the project site in accordance with the DDA and PSA was determined to not result in any new or more severe impacts related to historical resources. As discussed in the PEIR, there are no known religious or sacred uses within the project site or in the Community Plan Area as a whole. However, potential impacts may be unavoidable if resources are discovered during construction. Areas of potential concern include areas along waterways where prehistoric resources are					**X**	**X**

Issues and Supporting Information	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
most likely found. As discussed in the PEIR, while it is not expected that religious or sacred places or human remains would be disturbed as a result of future development at the project site, there is potential for resources to be present. In the event that human remains are discovered during project grading, work would halt in that area and the procedures set forth in the California Public Resources Code (Section 50987.98) and State Health and Safety Code (Section 7050.5), and in the federal, state, and local regulations would be undertaken. Development of the project site in accordance with the DDA and PSA was determined to not result in any new or more severe impacts related to historical resources. Implementation of PEIR Mitigation Measure HIST-1 would reduce religious and sacred use impacts to less than significant (see Appendix A).							
(c) **Result in the disturbance of any human remains, including those interred outside of formal cemeteries?** ***Less than Significant with Mitigation.*** As discussed above in Section VII (b), impacts on existing religious or sacred uses or the disturbance of any human remains were also identified by the PEIR as potentially significant (Impact 5.7-2). While there are no known human remains interred outside of formal cemeteries within the Community Plan Area, there are many areas within the region where previously unknown prehistoric human remains and prehistoric sites have been uncovered during archaeological investigations and grading activities. Therefore, the potential exists for encountering human remains during construction activities. As discussed above in Section VII (b), in the event that human remains are discovered during project grading, work would halt in the area and procedures set forth in the California Public Resources Code (Section 50987.98) and State Health and Safety Code (Section 7050.5), and in the federal, state, and local regulations would be undertaken. Development of the project site in accordance with the DDA and PSA was determined to not result in any new or more					**X**	**X**

Issues and Supporting Information	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
severe impacts related to historical resources. Implementation of PEIR Mitigation Measure and HIST-1 would reduce disturbance of human remain impacts to less than significant (see Appendix A).						
VIII. PALEONTOLOGICAL RESOURCES						
(a) **Allow development to occur that could substantially impact a unique paleontological resource or a geologic formation possessing a moderate to high fossil-bearing potential? *Less than Significant with Mitigation.*** The PEIR concludes that excavation within geologic formations containing a moderate to high potential for fossils could result in a significant impact to important paleontological resources (Impact 5.8-1). The PEIR includes mitigation measures that require monitoring for paleontological resources during construction activities if excavation would remove over 1,000 cubic yards of soil in a high resource potential geologic formation, or over 2,000 cubic yards to a depth of more than 10 feet in a geologic formation with a moderate resource potential. Recovery of significant paleontological resources would be required by a qualified paleontologist. The project site is underlain by alluvial floodplain deposits and the San Diego, Mission Valley, Stadium, Otay, and Sweetwater formations. The alluvial deposits are of low paleontological sensitivity and the river terrace deposits are of moderate paleontological sensitivity. The marine terrace deposits and the San Diego, Mission Valley, Stadium, Otay, and Sweetwater formations are all rated as having high paleontological sensitivity. The PEIR concludes that, based on the existence of geologic formations with a high or moderate resource potential, the potential exists that subsequent projects implemented in accordance with the Community Plan that involve grading and excavation of native soils could impact paleontological resources. The mitigation framework identified in the PEIR is required of all development with the potential					**X**	**X**

Issues and Supporting Information	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
to impact significant paleontological resources. Development of the project site in accordance with the DDA and PSA was determined to not result in any new or more severe impacts related to paleontological resources. Implementation of PEIR Mitigation Measure PALEO-1 would reduce paleontological resource impacts to less than significant (see Appendix A).						
IX. GEOLOGY AND SEISMIC HAZARDS						
(a) **Result in the exposure of people or structures to geologic hazards such as earthquakes, landslides, mudslides, ground failure, or similar hazards?** ***Less than Significant with Mitigation.*** The PEIR identified potentially significant impacts related to geologic and seismic hazards (Impacts 5.9-1 and 5.9-2). Potential impacts include the exposure of people or structures to geologic hazards such as earthquakes, landslides, mudslides, ground failure or similar hazards, and an increase in wind or water erosion of soils. The PEIR identified mitigation measures that require the identification of compressible and expansive soils on a building site, adherence to the City of San Diego's Grading Regulation and NPDES permit requirements, and the incorporation of engineering design that meets or exceeds adherence to the City of San Diego's Municipal Code and the California Building Code. The Community Plan Area contains geologic conditions that would pose significant risks for future development if not properly addressed at the project level. As discussed in the PEIR, the project site is not located in a fault zone or traversed by a fault. Additionally, the site's liquefaction potential indicates low risk and the site is not at risk for landslide. The project is also located outside the source shaking zone for the Alquist-Priolo Fault Zone located west of the Southeastern San Diego Community Plan Area. Development of the project site in accordance with the DDA and PSA was determined to not result in any new or more severe impacts related to geology or seismic					**X**	**X**

Issues and Supporting Information		Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
		Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
	hazards. Development of the project site is required to comply with the regulations specified above. Implementation of PEIR Mitigation Measure GEO-1 would reduce geologic hazard impacts to less than significant (see Appendix A).						
(b)	**Result in a substantial increase in wind or water erosion of soils? *Less than Significant with Mitigation.*** See Section IX (b) above. As discussed in the PEIR, project construction and grading activities could expose topsoil and increase soil erosion from water and wind. Continued implementation of the City's Municipal Code would ensure no adverse impacts from erosion or loss of topsoil. Development of the project site in accordance with the DDA and PSA was determined to not result in any new or more severe impacts related to erosion of soils. Development of the project site is required to comply with the regulations specified above in Section IX (b). Implementation of PEIR Mitigation Measure GEO-2 would reduce soil erosion impacts to less than significant (see Appendix A).					X	X
(c)	**Result in allowing structures to be located on a geological unit or soil that is unstable or that would become unstable and potentially result in on-site or off-site landslides, lateral spreading, subsidence, liquefaction or collapse? *Less than Significant.*** The PEIR concluded that future projects implemented in accordance with the CPU would comply with the policies outlined in the plan, as well as the City of San Diego's Municipal Code and the California Building Code, which would prevent the location of structures on an unstable geologic unit or soil, and thus reduce associated impacts to less than significant (Impact 5.9-3). As discussed in the PEIR, development on a geologic unit or soil that is unstable would pose potential risks to life and property if not properly addressed at the project level. Figure 5.9-4 of the PEIR indicates that the project site is not located on a known fault or a slide-prone					X	X

Issues and Supporting Information	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
formation. The potential for liquefaction on the project site is mapped as low. Development of the project site in accordance with the DDA and PSA was determined to not result in any new or more severe impacts to unstable geologic soils. In addition, development must comply with applicable requirements of the City of San Diego's Municipal Code and the California Building Code. No mitigation is required.						
X. HAZARDOUS MATERIALS						
(a) **Expose people or sensitive receptors to potential health hazards (e.g., exposing sensitive receptors to hazardous materials in industrial areas)? *Less than Significant.*** The PEIR concluded that implementation of the CPU would result in less than significant impacts related to exposure of people or sensitive receptors to potential health hazards (Impact 5.10-1). As discussed in the PEIR, development of sites with existing contamination could potentially pose a hazard to the public or environment by placing sensitive receptors on, or adjacent to, known hazardous materials sites. There are no documented hazardous material release cases on the project site. As discussed in the PEIR, one documented hazardous material release case is located at 1025 Euclid Avenue, across the street from the project site. Cleanup was complete on July 10, 1992 and the case is closed. Additionally, while the site is currently vacant, aerial imagery shows that a portion of the project site, abutting Euclid Avenue, was previously developed with residential units. Since the site was previously developed with residences, the potential for unknown hazardous materials at the site is low. Development of the project site in accordance with the DDA and PSA was determined to not result in any new or more severe impacts related to hazardous materials. Additionally, development on the project site is required to adhere to specific local, state and federal guidelines regarding the use, transportation, disposal, and accidental release of hazardous materials. No					X	X

Issues and Supporting Information		Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
		Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
	mitigation is required.						
(b)	**Result in a project located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or environment?** ***No Impact.*** The PEIR concluded that implementation of the CPU would result in no impacts associated with the creation of a significant hazard to the public or environment resulting from the development of a hazardous materials site (Impact 5.10-2). As discussed in the PEIR, no properties within the Community Plan Area are included in a list of hazardous materials sites compiled pursuant to Government Code Section 6596.2, which includes hazardous waste facilities subject to corrective action, land designated as hazardous waste property or border zone property, properties with hazardous waste disposals on public land, hazardous substance release sites selected for a response action, and sites included in the Abandoned Site Assessment Program. The documented hazardous release case discussed above in Section X (a) at 1025 Euclid Avenue is a closed site and not contained on the list pursuant to Government Code Section 65962.5. Compliance with federal, state, and local regulations would ensure that any potential impact is less than significant. Development of the project site in accordance with the DDA and PSA was determined to not result in any new or more severe impacts related to hazardous materials sites. No mitigation is required.					**X**	**X**
(c)	**Impair implementation of, or physically interfere with an adopted emergency response plan or emergency evacuation plan?** ***Less than Significant.*** The PEIR concluded that implementation of the CPU would result in less than significant impacts related to interference with an adopted emergency response or evacuation plan (Impact 5.10-3).					**X**	**X**

Issues and Supporting Information		Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
		Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
	The project would not physically interfere with the San Diego County Operational Area Emergency Plan, and the Community Plan policies provide improvements to the street and freeway system that would serve to improve evacuation times. Therefore, no impacts beyond those analyzed in the PEIR are expected to occur. No mitigation is required.						
(d)	**Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including when wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?** ***Less than Significant.*** The PEIR concluded that implementation of the CPU would result in less than significant impacts related to exposure of people or structures to risks associated with wildfires (Impact 5.10-4). The project site is not located within a fire hazard zone. As discussed in the PEIR, future projects implemented in accordance with the Community Plan are required to incorporate sustainable development and other measures into site plans in accordance with the City's Brush Management Regulations, and Landscape Standards pursuant to General Plan and Community Plan policies intended to reduce the risk of wildfires. In addition, development projects must be reviewed for compliance with the 2010 California Fire Code, Section 145.07 of the Land Development Code, and Chapter 7 of the CBC, and would be reviewed for compliance with all City and Fire Code requirements aimed at ensuring the protection of people or structures from potential wildland fire hazards. Therefore, development of the project site in accordance with the DDA and PSA was determined to not result in any new or more severe impacts related to wildfire risk. No mitigation is required.					**X**	**X**
(e)	**Result in hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within a quarter-mile of an existing or proposed school?** ***Less than Significant.*** The PEIR concluded					**X**	**X**

Issues and Supporting Information	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
that implementation of the CPU would result in less than significant impacts related to hazardous emissions within a quarter-mile of an existing or proposed school (Impact 5.10-5). The project site is located within 0.25 mile of existing schools (0.05 mile east of Millennial Tech Middle School, 0.15 mile east of Gompers Preparatory Academy, and 0.15 mile north of Horton Elementary School). However, as discussed in Section X (a), the project site is not located on a documented hazardous material release site. In addition, the project does not propose to demolish any existing structures on-site that could produce a hazard related to the release of asbestos, lead based paint, or other hazardous materials. The current regulatory environment of federal, state, and local requirements provides a high level of protection from new hazardous uses that may be sited near schools or other sensitive receptors. Therefore, development of the project site in accordance with the DDA and PSA was determined to not result in any new or more severe impacts related to hazardous materials within a quarter-mile of an existing or proposed school. No mitigation is required.							
(f) **Result in a safety hazard for people residing or working in a designated airport influence area?** ***Less than Significant.*** The PEIR concluded that implementation of the CPU would result in less than significant impacts related to safety hazards for people residing or working in a designated airport influence area (Impact 5.10-6). The project site is located within Review Area 2 of the SDIA Influence Area and is therefore subject to the SDIA ALUCP. Airspace protection and overflight policies and standards apply to Review Area 2. The City requires a Federal Aviation Administration determination of no hazard to air navigation for both ministerial and discretionary projects prior to approving or recommending approval as addressed in					**X**	**X**

Issues and Supporting Information	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Development Services Department Information Bulletin 520. Additionally, an overflight notification agreement must be recorded with the Office of the County Recorder for any new dwelling unit within the overflight area. Development of the project site would be subject to airspace protection and overflight policies and standards. Development of the project site in accordance with the DDA and PSA was determined to not result in any new or more severe impacts related to airport safety hazards. No mitigation is required.						
XI. GREENHOUSE GAS EMISSIONS						
(a) **Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?** ***Less than Significant.*** The PEIR concluded that GHG emissions resulting from implementation of the CPU would be less than significant as the emissions at buildout of the CPU would be less than would occur without the CPU (Impact 5.11-1). Development of the project site, in accordance with the DDA and PSA, was determined to not result in any new or more severe impacts related to GHG emissions. As discussed earlier, the project site was assumed to be developed at the maximum density and intensity allowed under the Community Plan and PEIR. The residential and commercial land use density and intensity allowed by the DDA and PSA are less than the maximum density and intensity assumed for the GHG analysis in the PEIR; therefore the future development's GHG emissions would be less than proposed under the Community Plan. Regardless, the DDA and PSA require development to conform with SDR-2 of the Encanto Neighborhoods CPIOZ-Type A, which requires the development to comply with the City's Climate Action Plan (CAP) by completing a CAP Checklist and implementing the associated GHG reduction measures. No mitigation is required.					**X**	**X**

Issues and Supporting Information	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
(b) **Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emission of GHGs?** ***No Impact.*** The PEIR concluded that implementation of the CPU would not conflict with a plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs (Impact 5.11-2). As discussed in the City of San Diego CEQA Significance Determination Thresholds, the Community Plan would be consistent with the General Plan if it would reduce vehicle miles traveled by encouraging alternative modes of transportation. Development of the project site, in accordance with the DDA and PSA, was determined to not result in any new or more severe impacts related to GHG emissions. As discussed above in Section XI (a), the residential and commercial land use density and intensity allowed by the DDA and PSA are less than was assumed in the GHG analysis in the PEIR; therefore GHG emissions would be less than proposed under the buildout scenario of the Community Plan. Regardless, the development would comply with the City's CAP by completing a CAP Checklist and implementing the associated greenhouse gas reduction measures. Future development would also be located approximately 0.3 mile from the Euclid Avenue multi-modal trolley (Orange Line) and bus transit station, which would encourage the use of alternative transportation and fewer vehicle miles traveled in the Community Plan Area. No mitigation is required.					X	X
XII. ENERGY						
(a) **Result in the use of excessive amounts of electric power, fuel, or other forms of energy (e.g., natural gas, oil) during its construction or long-term operation?** ***Less than Significant.*** The PEIR concluded that implementation of the CPU would result in less than significant impacts related to electrical power (Impact 5.12-1). The increased demand for electric power in the Community Plan Area, including					X	X

Issues and Supporting Information	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
development of the project site, was determined to not result in a need for new electrical systems or a requirement for a substantial alteration of existing utilities, which would create physical impacts. Implementation of the CPU was determined not to have an adverse effect on the use of fuel (Impact 5.12-2). Energy used during future construction of the planned land uses was not considered excessive given the anticipated reduction in construction equipment emissions and the short-term nature of the energy consumption needed for construction. The PEIR also concluded that development in accordance with the CPU would not result in the use of excessive amounts of fuel during the operation of future development projects under the CPU due to the incorporation of goals to promote alternatives to the automobile and compliance with energy conservation measures required by energy policies. Development of the project site in accordance with the DDA and PSA was determined to not result in any new or more severe impacts related to electrical power or fuel consumption. At a minimum, development at the project site implemented in accordance with the Community Plan is required to meet the mandatory energy standards of the current California energy code. Future development of the project site would also be required to comply with the Community Plan Urban Design Element, which contains a list of climate change and sustainable development policies that focus on designing new development to have a climate, energy efficient, and environmentally oriented site design. Additionally, construction of future development at the project site would consume energy through the operation of heavy off-road equipment, trucks, and worker traffic. However, construction equipment used for future development is anticipated to be more efficient as engines are replaced, exhaust systems are						

Issues and Supporting Information	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
retrofitted, and older equipment is retired and new equipment meeting more stringent emission standards is put into service. Future operational energy use related to vehicle use would consist of transportation fuels consumed to transport future residents, employees, and visitors of the project. However, the Community Plan Mobility Element contains policies to reduce vehicle miles traveled and associated fuel consumption. In addition, future residents would be able to reduce reliance on the automobile by taking advantage of nearby bus and trolley transportation. No mitigation is required.						
XIII. PUBLIC SERVICES AND FACILITIES						
(a) **Have an effect upon, or result in the need for new or altered governmental service in police protection, parks or other recreational facilities, fire/safety protection, libraries, schools, or maintenance or public facilities, including roads? *Less than Significant.*** The PEIR concluded that implementation of the CPU would result in less than significant impacts related to the need for new or altered governmental service in police protection, parks or other recreational facilities, fire/safety protection, libraries, schools, or maintenance of public facilities, including roads (Impact 5.13-1). Given that the police protection standards enumerated in the General Plan, that the CPU include relevant policies to reduce criminal activity, that the Impact Fee Study (IFS) would support additional police and fire facilities, the impact on these facilities was determined to be less than significant. As the CPU improves the ratio of usable acres per 1,000 residents, and contains policies to promote future park equivalencies, impacts related to recreation resources were determined to be less than significant. Since the CPU would be adequately served by existing school capacity under a low estimate, and contain policies to improve school capacity, impacts on school facilities were determined to be less than significant. The CPU contains policies to ensure that future library services					X	X

Issues and Supporting Information	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
provide the necessary resources for future residents. Given these policies, in addition to General Plan policies, it is reasonable to expect that the community would have adequate access to library services. As such, impacts related to library service were determined to be less than significant. The PEIR concludes that implementation of the Community Plan would increase the demand for public services and facilities as a result of population growth (Encanto Neighborhoods may generate an increase of up to 26,020 residents). An IFS was prepared as part of the implementation of the Community Plan. The IFS ensures that future projects proposed within the Community Plan Area are assessed fees that would contribute towards the construction of any necessary new police and/or fire safety protection facilities. The PEIR also identified that implementation of the Community Plan would result in demand for new park lands. However, this deficit would be fulfilled in the future by land acquisitions/donations or future park equivalencies identified by the City or the community. Buildout of the Community Plan and the project also has the potential to result in an increased student population; however, the San Diego Unified School District is responsible for planning, siting, building, and operating schools in their responsible districts within the community. Payment of school fees mitigates project-level impacts to schools. Policies identified in the Community Plan would also provide enhanced public services and facilities, which, in combination with the preparation of the IFS, would ensure public services and facilities needs are met. The physical effects of constructing these facilities would be assessed pursuant to CEQA at the time such facilities are proposed. In relation to public services and facilities, approval of the project would facilitate the development of						

Issues and Supporting Information	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
residential and commercial land uses consistent with the development capacity assumed under the Community Plan buildout. In fact, future development in accordance with the DDA and PSA would develop less dense residential and commercial uses than those assumed in the Community Plan and PEIR analysis. Therefore, no impacts beyond those analyzed in the PEIR are expected to occur. No mitigation is required.						
XIV. PUBLIC UTILITIES						
(a) **Result in a need for new systems, or require substantial alteration to existing utilities, the construction of which would create physical impacts with regard to the following: natural gas, water, sewer, communication systems, and solid waste disposal?** ***Less than Significant.*** The PEIR concluded that implementation of the CPU would result in less than significant impacts related to need for new utility systems, or require substantial alterations to existing utilities, the construction of which would create physical impacts with regard to utilities related to natural gas, water, sewer, storm water, communication systems, or solid waste disposal (5.14-1). Implementation of the CPU would not directly require alteration to existing natural gas facilities. The planning level analysis of the CPU shows an estimated decrease in future natural gas consumption in the CPU areas compared to current consumption. Given ongoing and planned improvements to the supporting infrastructure, existing regulations and guidelines to ensure adequate capacity, and proposed CPU policies to support capital improvements, impacts related to water supply, sewer treatment and storm drainage utilities were considered less than significant. With ongoing compliance from future development with the Land Development Code and Waste Management Plan requirements and policies promoting waste diversion, as well as compliance with proposed policies in the CPU, impacts from solid waste were determined to be less than significant.					**X**	**X**

Issues and Supporting Information	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
As discussed in the PEIR, implementation of the Community Plan would result in future residential, commercial, and industrial land uses resulting in additional population, which would generate additional demand for natural gas, water, sewer, communication systems, and solid waste management over existing levels. However, future development of the project site would be consistent with the development capacity assumed under the Community Plan buildout scenario. In fact, future development in accordance with the DDA and PSA would develop less dense residential and commercial uses than those assumed in the Community Plan and PEIR analysis. As discussed in the PEIR, natural gas consumption in the Community Plan Area is estimated to decrease and sufficient water supply is available to meet the project water demands of the Community Plan. Future development of the project site would also be required to comply with the City's Municipal Code regulations regarding sewers and wastewater facilities and would be expected to follow the City's Sewer Design Guidelines, and would be required to comply with City regulations regarding solid waste. Any construction of communications systems associated with future development would occur in accordance with the City's permitting processes and construction standards. Therefore, no impacts beyond those analyzed in the PEIR are expected to occur. No mitigation is required.							
(b) **Result in the use of excessive amounts of water?** ***Less than Significant.*** The PEIR concluded that CPU implementation would not result in the use of excessive amounts of water (Impact 5.14-2). Based upon the findings in the Water Supply Assessments prepared for the PEIR, the projected water demands for the CPU are consistent with existing water resource planning documents, that sufficient water supplies exist to meet projected demands, and that water conservation policies in the CPU seek to reduce the amount of water required for development, impacts to water consumption were considered less than significant.					X	X

Issues and Supporting Information	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
The Community Plan is also consistent with water demand assumptions in the regional water resources planning documents of the City, the San Diego County Water Authority, and the Metropolitan Water District. Additionally, development of the project site would be consistent with the development capacity assumed under the Community Plan buildout scenario. In fact, future development in accordance with the DDA and PSA would develop less residential and commercial uses than those assumed in the Community Plan and PEIR analysis. Therefore, development of the project site in accordance with the DDA and PSA was determined to not result in any new or more severe impacts related to water consumption. No mitigation is required.						
XV. **VISUAL EFFECTS AND NEIGHBORHOOD CHARACTER**						
(a) **Result in a substantial adverse alteration to the existing or planned visual character of the area?** ***Less than Significant.*** The PEIR concluded that implementation of the CPU would not result in significant impacts to the existing or planned character of the area (Impact 5.15-1). Much of the CPU area is already developed, and any new development was expected to take place on infill sites. New development projects were anticipated to be developed in accordance with the City's General Plan and Land Development Code. Compliance with these existing policies and regulations would prevent development in excess of height and bulk regulations and ensure that any new development would be compatible with historic preservation standards, landform features such as hillsides, and any sensitive resources that may contribute to visual character. Development of the project site would be considered infill development as the project site is currently vacant and surrounded by existing residential and commercial land uses. Additionally, development at the site would					**X**	**X**

Issues and Supporting Information	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
be in accordance with the City's General Plan and Municipal Code to prevent development in excess height and bulk regulations and ensure that any new development is compatible with historic preservation, landform features, and any sensitive resources that may contribute to visual character. Additionally, future development at the site would be in accordance with the Community Plan, which serves to enhance the existing character of the neighborhoods within the community. Development of the project site in accordance with the DDA and PSA was determined to not result in any new or more severe impacts related to neighborhood character. No mitigation is required.						
(b) **Result in a substantial change in the existing landform?** ***Less than Significant.*** Though future development in the CPU area may require grading activities as part of construction, the PEIR concluded that future development would not have a significant impact on landforms (Impact 5.15-2). All future projects were assumed to be subject to the regulations in the City's Land Development Code. As a result, projects need to demonstrate compliance with the hillsides regulations and other ESL Regulations. The project site is flat with the exception of the arroyo where the elevation is approximately 15 to 20 feet less than the rest of the project site. However, future development of the site would include restoration of the arroyo with native plantings. Regardless, future development would be subject to the regulations in the City's Land Development Code and any projects in slope areas would need to demonstrate compliance with the Environmentally Sensitive Lands Regulations prior to permit approval. As summarized in the project description, approval of project would facilitate future development of residential and commercial uses less dense than the development capacity assumed for Community Plan Area and the project site. Therefore, no impacts beyond					**X**	**X**

Issues and Supporting Information	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
those analyzed in the PEIR are expected to occur. No mitigation is required.						
(c) **Create a substantial light or glare which would adversely affect daytime and nighttime views in the area?** ***Less than Significant.*** Implementation of the CPUs was determined to not create light or glare which would adversely affect daytime and nighttime views in the area (Impact 5.15-3). The CPU area is largely developed. Furthermore, the PEIR concluded that future development would be required to comply with applicable lighting controls contained in the Municipal Code All future development at the project site is required to comply with the City of San Diego Municipal Code, which includes light pollution reduction regulations. The Community Plan Area is largely developed and any new development resulting from the Community Plan would take place in or near developed and urbanized areas where moderate light and glare already exist. Lighting from future development in compliance with the Municipal Code and the policies in the Community Plan would not be out of character with the urban environment. Therefore, development of the project site in accordance with the DDA and PSA was determined to not result in any new or more severe impacts related to water consumption. No mitigation is required.						**X**	**X**
XVI. MANDATORY FINDINGS OF SIGNIFICANCE						
(a) **Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?** ***Less than Significant with Mitigation.*** As indicated in the PEIR,					**X**	**X**

Issues and Supporting Information		Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
		Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
	future development of the project site has the potential to impact sensitive plant and wildlife species and a potentially jurisdictionally wetland (arroyo). Furthermore, future development of the project site has the potential to impact unknown historic and paleontological resources. For projects that have the potential to reduce the number of unique, rare, endangered, sensitive, or protected species or impact wetlands, site-specific surveys would be conducted in accordance with City of San Diego Biology Guidelines and MSCP Subarea Plan. Further, development projects with the potential to affect historical and paleontological resources are subject to site-specific review in accordance with the City's Historical Resources Regulations and Historical Resource Guidelines, through the discretionary process. Cumulative impacts are described in Section XVI (b) below. Implementation of PEIR Mitigation Measure BIO-1 through BIO-3 and HIST-1 would reduce impacts to less than significant (see Appendix A).						
(b)	**Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)? *Less than Significant with Mitigation.*** As acknowledged in the PEIR, implementation of the Community Plan would result in cumulative impacts associated with transportation, air quality, and noise. Development of the project site in accordance with the DDA and PSA was determined to not result in any new or more severe cumulative impacts. As discussed above, the type and intensity of development which would occur under the DDA and PSA was assumed to occur on the project site as part of the PEIR analysis and would be less than assumed. Thus, development of the project would not result in a substantial increase in					**X**	**X**

Issues and Supporting Information	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
the significant cumulative impacts associated with traffic, air quality or noise. No mitigation is required.						
(c) **Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly? *Less than Significant with Mitigation.*** Impacts associated with air quality, noise, and geology and seismic hazards have the potential to cause substantial adverse effects on human beings. In regards to air quality, air quality emissions were assumed in the Community Plan and PEIR. Future projects that would exceed daily construction emissions thresholds established by the City of San Diego would be required to incorporate best available control measures/technology to reduce construction emissions to below daily emission standards established by the City of San Diego. In regards to noise, future development would require a project-specific noise study if required to determine the noise attenuation measures needed to achieve the noise levels specified in the Noise Element and implement the necessary attenuation. In regards to geology and seismic hazards, future development on the project site would be required to adhere to the City of San Diego's Grading Regulation and NPDES permit requirements, and incorporate engineering design that meets or exceeds adherence to the City of San Diego's Municipal Code and the California Building Code, which would result future potential impacts. Implementation of PEIR Mitigation Measure AQ-1 through AQ-4 and GEO-1 and GEO-2 would reduce impacts to less than significant (see Appendix A).					**X**	**X**

REFERENCES

City of San Diego. 2015. *Southeastern San Diego and Encanto Neighborhoods Community Plan Updates Final Program Environmental Impact Report.* October. Available online at: https://www.sandiego.gov/sites/default/files/legacy//planning/programs/ceqa/2015/20151006ssdandenfeir.pdf. Accessed October 2, 2017.

City of San Diego. 2004. *San Diego Municipal Code, Land Development Code, Steep Hillside Guidelines.* September. Available online at: https://www.sandiego.gov/sites/default/files/legacy/development-services/pdf/industry/landdevmanual/ldmsteephillsides.pdf. Accessed October 9, 2017.

APPENDIX A
HILLTOP AND EUCLID CEQA CONSISTENCY EVALUATION
MITIGATION MONITORING AND REPORTING PROGRAM

Significant Impact	Mitigation Measure (MM)	Implementation Time Frame	Implementation Responsibility	Verification Responsibility
LAND USE				
Impact 5.1-2: The project has the potential to conflict with the purpose and intent of the ESL Regulations. [1]	**MM-LU-1a:** Future development proposals subject to discretionary review shall be reviewed in accordance with MM BIO-1 through BIO-3.	Prior to Development Permit Approval	City of San Diego Development Services Department (DSD)	DSD
AIR QUALITY				
Impact 5.3-2: The project would substantially contribute to the existing violation of state and federal ambient air quality standards for ozone.	**MM-AQ-1:** Future projects that would exceed daily construction emissions thresholds established by the City of San Diego shall incorporate best available control measures/technology to reduce construction emissions to below daily emission standards established by the City of San Diego. Best available control measures/technology shall include: A. Minimizing simultaneous operation of multiple pieces of construction equipment; B. Use of more efficient, or low pollutant emitting, equipment, e.g., Tier III or IV rated equipment; C. Use of alternative fueled construction equipment; D. Minimizing idling time by construction vehicles; E. Haul trucks shall be covered when loaded with soil; F. Paved streets shall be swept at least once per day where there is evidence of dirt that has been carried on to the roadway; G. Active disturbed areas shall have water applied to them two times daily; H. Inactive disturbed areas shall be revegetated to prevent soil erosion; I. For disturbed surfaces to be left inactive for 4 or more days and that will not be revegetated, a chemical stabilizer shall be applied per manufacturer's instruction; J. Vehicle speed on unpaved roads shall be limited to 15 miles per hour (mph); K. For open storage piles that will remain on-site for 2 or more days, water shall be applied once per hour, or coverings shall be used; L. For paved road track-out, all haul vehicles shall be covered, or shall comply with	Prior to Construction Permits and During Construction	Developer	DSD

[1] MM-LU-1b and LU-2 have been omitted from this project-specific MMRP as they are not applicable to the project. MM-LU-1b applies to projects that are within the Sherman Heights and Grant Hill Park Historic Districts; the project site is not located within either of the two historic districts and therefore not subject to MM-LU-1b. MM-LU-2 applies to land within or adjacent to MHPA; the project site is not located within or adjacent to MHPA and therefore not subject to MM-LU-2.

Significant Impact	Mitigation Measure (MM)	Implementation Time Frame	Implementation Responsibility	Verification Responsibility
	vehicle freeboard requirements of Section 23114 of the California Vehicle Code for all public and private roads; M. During high wind conditions (sustained wind speeds in excess of 25 mph), all earthmoving activities shall cease or water shall be applied to soil not more than 15 minutes prior to disturbing such soil.			
	MM-AQ-2: Development that would significantly impact air quality, either individually or cumulatively, shall receive entitlement only if it is conditioned with all reasonable mitigation to avoid, minimize, or offset the impact. As a part of this process, future projects shall be required to buffer sensitive receptors from air pollution sources through the use of landscaping, open space, and other separation techniques.	Prior to Development Permit Approval	Project Applicant	DSD
Impact 5.2-3: The project would not expose sensitive receptors to substantial pollutant concentrations.	**MM-AQ-3:** Prior to the issuance of building permits for any new facility that would have the potential to emit toxic air contaminants, in accordance with AB 2588, an emissions inventory and health risk assessment shall be prepared. If adverse health impacts exceeding public notification levels (cancer risk equal to or greater than 10 in 1,000,000) are identified, the facility shall provide public notice to residents located within the public notification area and submit a risk reduction audit and plan to the APCD that demonstrates how the facility would reduce health risks to less than significant levels within five years of the date the plan.	Prior to Building Permit	Developer	DSD
	MM-AQ-4: Prior to the issuance of building permits for any project containing a facility identified in Table 5.3-3 of the PEIR, or locating air quality sensitive receptors closer than the recommended buffer distances, future projects implemented in accordance with the CPUs shall be required to prepare a health risk assessment (HRA) with a Tier I analysis in accordance with APCD HRA Guidelines and the Office of Environmental Health Hazard Assessment (OEHHA) Air Toxics "Hot Spots" Program Risk Assessment Guidelines (APCD 2006; OEHHA 2003). All HRAs shall include: 1. The estimated maximum 70-year lifetime cancer risk, 2. The estimated maximum non-cancer chronic health hazard index (HHI), and 3. The estimated maximum non-cancer acute health hazard index (HHI). Risk estimates shall each be made for the off-site point of maximum health impact (PMI), the maximally exposed individual resident (MEIR), and the maximally exposed individual worker (MEIW). The location of each of these receptors shall be specified. The lifetime cancer risk, non-cancer chronic and acute health hazard indexes for nearby sensitive receptors shall also be reported. Cancer and non-cancer chronic risk estimates shall be based on inhalation risks. HRAs shall include estimates of population exposure, including cancer burden, as well as cancer and noncancer chronic and acute risk isopleths (contours). The HRA shall identify best available control technology (BACT) required to reduce risk to less than 10 in 1,000,000.	Prior to Building Permit	Developer	DSD

Significant Impact	Mitigation Measure (MM)	Implementation Time Frame	Implementation Responsibility	Verification Responsibility
NOISE				
Impact 5.4-1: The project would result in the exposure of people to future transportation noise levels which exceed the land use compatibility standards established in the General Plan.	**MM-NOS-1:** Site-specific exterior noise analyses demonstrating that the project would not place residential receptors in locations where the exterior existing or future noise levels would exceed the noise compatibility standards of the City's General Plan shall be required as part of the environmental and discretionary review of future development proposals. Effective noise reduction measures may include, but are not limited to, building noise barriers, increased building setbacks, speed reductions on surrounding roadways, alternative pavement surfaces, or other relevant noise attenuation measures. Exact noise mitigation measures and their effectiveness shall be determined by the site-specific exterior noise analyses.	Prior to Development Permit Approval	Project Applicant	DSD
	MM-NOS-2: When building plans are available and prior to the issuance of building permits, site-specific interior noise analyses demonstrating compliance with the interior noise compatibility standards of the City's General Plan and other applicable regulations shall be prepared for noise sensitive receptors located in areas where exterior noise levels exceed the noise compatibility standards of the City's General Plan. Noise control measures including but not limited to, increasing roof, wall, window, and door sound attenuation ratings, placing heating, ventilation, and air conditioning (HVAC) units in noise reducing enclosures, or designing buildings so that no windows face freeways or major roadways, may be used to achieve the noise compatibility standards. Exact noise mitigation measures and their effectiveness shall be determined by the site-specific exterior noise analyses.	Prior to Building Permit	Developer	DSD
Impact 5.4-2: The project would result in a significant increase in the existing ambient noise levels.	See **MM-NOS-1** and **NOS-2** above, and **MM-NOS-3** below.	Prior to Building Permit	Developer	DSD
Impact 5.4-3: The project would result in the exposure of people to noise levels which exceed standards established in the Noise Abatement and Control Ordinance.	**MM-NOS-3:** Prior to the issuance of a building permit, a site-specific acoustical/noise analysis of any on-site generated noise sources, including generators, mechanical equipment, and trucks, shall be prepared which identifies all noise-generating equipment, predicts noise levels at property lines from all identified equipment, and recommends mitigation to be implemented (e.g., enclosures, barriers, site orientation), to ensure compliance with the City's Noise Abatement and Control Ordinance. Noise reduction measures shall include building noise-attenuating walls, reducing noise at the source by requiring quieter machinery or limiting the hours of operation, or other attenuation measures. Additionally, future projects shall be required to buffer sensitive receptors from noise sources through the use of open space and other separation techniques as recommended after thorough analysis by a qualified acoustical engineer. Exact noise mitigation measures and their effectiveness shall be determined by the site specific noise analyses.	Prior to Building Permit	Developer	DSD

Significant Impact	Mitigation Measure (MM)	Implementation Time Frame	Implementation Responsibility	Verification Responsibility
	MM-NOS-4: For projects that exceed daily construction noise thresholds established by the City of San Diego, best construction management practices shall be used to reduce construction noise levels to comply with standards established by the Municipal Code in Chapter 5, Article 9.5, Noise Abatement and Control. Project applicant shall prepare and implement a Construction Noise Management Plan. Appropriate management practices shall be determined on a project-by-project basis, and are specific to the location. Control measures shall include: A. Minimizing simultaneous operation of multiple construction equipment units; B. Locating stationary equipment as far as reasonable from sensitive receptors; C. Requiring all internal combustion-engine-driven equipment to be equipped with mufflers that are in good operating condition and appropriate for the equipment; and D. Construction of temporary noise barriers around construction sites that block the line-of-sight to surrounding receptors.	Prior to Construction Permits and During Construction	Developer	DSD
BIOLOGICAL RESOURCES				
Impact 5.5-1: The project could have an adverse effect on sensitive plant and wildlife species.	**MM-BIO-1:** Prior to issuance of any discretionary permit for a future development project implemented in accordance with the CPUs, all projects which could have potentially significant impacts resulting in a reduction in the number of unique, rare, endangered, sensitive, or fully protected species of plants or animals shall be analyzed in accordance with the CEQA Significance Thresholds, which require that site-specific biological resources surveys be conducted in accordance with City of San Diego Biology Guidelines (2012) and MSCP Subarea Plan. Where sensitive biological resources are known or suspected on or adjacent to a proposed project site, a biological assessment shall be performed for that project. Based on available habitat within the CPU areas, focused presence/absence surveys shall be conducted in accordance with the Biology Guidelines and applicable resource agency survey protocols. Engineering design specifications based on project-level grading and site plans shall be incorporated into the design of future projects to minimize or eliminate direct impacts on sensitive plant and wildlife species consistent with the FESA, MBTA, CESA, MSCP Subarea Plan, and ESL Regulations. <u>Mitigation for Impacts on Sensitive Upland Habitats</u> Future projects implemented in accordance with the CPUs resulting in impacts on sensitive upland Tier I, II, IIIA, or IIIB habitats shall implement avoidance and minimization measures consistent with the City Biology Guidelines and MSCP Subarea Plan and provide suitable mitigation in accordance with Table 3 in the City's Biology Guidelines (see Table 11.5-1, reproduced from Table 5.5-4 in Chapter 5 of the PEIR) and MSCP Subarea Plan. Future project-level grading and site plans shall incorporate	Prior to Development Permit Approval	Project Applicant	DSD

Significant Impact	Mitigation Measure (MM)	Implementation Time Frame	Implementation Responsibility	Verification Responsibility
	project design features to minimize direct impacts on sensitive vegetation communities including but not limited to riparian habitats, wetlands, maritime succulent scrub, coastal sage scrub, and grasslands consistent with federal, state, and City guidelines. Any required mitigation for impacts on sensitive vegetation communities shall be outlined in a conceptual mitigation plan following the outline provided in the City Biology Guidelines. Mitigation for impacts on sensitive vegetation communities shall be implemented at the time future development projects are proposed. Project-level analysis shall determine whether the impacts are within or outside the MHPA. Any MHPA boundary adjustments shall be processed by the individual project applicants through the City and Wildlife Agencies during the early project planning stage. Mitigation for impacts on sensitive upland habitats shall occur in accordance with the MSCP mitigation ratios as specified within the City's Biology Guidelines (City of San Diego 2012). These mitigation ratios are based on the tier level of the vegetation community, the location of the impact, and the location of the mitigation site(s). For example, impacts on lands inside the MHPA and mitigated outside the MHPA would have the highest mitigation ratio, whereas impacts on lands outside the MHPA and mitigated inside the MHPA would have the lowest mitigation ratio. <u>Mitigation for Impacts to Wetlands</u> Please refer to Mitigation Framework MM-BIO-2 under Impact 5.5-2. <u>Mitigation for Short-term Impacts on Sensitive Species from Project Construction</u> Within the Encanto Neighborhoods CPU area, for proposed development adjacent to or within the MHPA, construction noise that exceeds the maximum levels allowed shall be avoided during the breeding seasons for protected avian species such as: coastal California gnatcatcher (March 1-August 15); least Bell's vireo (March 15-September 15); and coastal cactus wren (February 15-August 15). If construction is proposed during the breeding season for these species, USFWS protocol surveys shall be required in order to determine species presence/absence. When applicable, adequate noise reduction measures shall be incorporated. Additional specific measures necessary for reducing potential indirect impacts on sensitive bird species, including coastal California gnatcatcher. least Bell's vireo, and coastal cactus wren, are further detailed in Mitigation Framework MM-BIO-3.			

Significant Impact	Mitigation Measure (MM)	Implementation Time Frame	Implementation Responsibility	Verification Responsibility
Impact 5.5-2: The project could have an adverse effect on wetlands.	**MM-BIO-2:** To reduce potential direct impacts on City, state, and federally regulated wetlands, all subsequent projects developed in accordance with the CPUs shall be required to comply with ACOE CWA Section 404 requirements and special conditions, RWQCB in accordance with Section 401 of the CWA, CDFW Section 1602 Streambed Alteration Agreement requirements and special conditions, and the City of San Diego ESL Regulations for minimizing impacts on wetlands. Achieving consistency with these regulations for impacts on wetlands and special aquatic sites would reduce potential impacts on regulated wetlands and provide compensatory mitigation (as required) to ensure no net loss of wetland habitats. In addition, if federal listed species are present on a project site, the USFWS would be included in the consultation initiated by the ACOE during the 404 permit process in accordance with Section 7 of the FESA. If there is no federal nexus to jurisdictional waters, then a Section 10(A) authorization from USFWS would be required to cover any potential effects on federal listed species. Prior to obtaining discretionary permits for future actions implemented in accordance with the CPUs that are subject to ESL, and/or where the CEQA review has determined that there may be a significant impact on other biological resources considered sensitive under CEQA, a site-specific biological resources survey shall be completed in accordance with City of San Diego Biology Guidelines. In addition, a preliminary or final jurisdictional waters/wetlands delineation of the project site shall be completed following the methods outlined in the ACOE's 1987 *Wetlands Delineation Manual*, the 2008 *Regional Supplement to the Corps of Engineers Delineation Manual for the Arid West Region*, and any required updated or additional standards. A determination of the presence/absence and boundaries of any waters of the U.S. and waters of the state shall also be completed following the appropriate ACOE guidance documents for determining the OHWM boundaries. The limits of any riparian habitats on-site under the sole jurisdiction of CDFW shall also be delineated, as well as any special aquatic sites (excluding vernal pools) that may not meet federal jurisdictional criteria but are regulated by the RWQCB. Engineering design specifications based on project-level grading and site plans shall be incorporated into the project design to minimize direct impacts to wetlands, jurisdictional waters, riparian habitats, and vernal pools consistent with federal, state, and City guidelines. Any required mitigation for proposed impacts shall be outlined in a conceptual wetland mitigation plan prepared in accordance with the City's Biology Guidelines (2012). Additionally, any impacts on wetlands in the City of San Diego would require a deviation from the ESL wetland regulations. Under the wetland deviation process, development proposals that have wetland impacts shall be considered only pursuant to one of three options: Essential Public Project, Economic Viability Option, or Biologically Superior Option. ESL Regulations require that impacts on wetlands be avoided. Unavoidable impacts on wetlands shall be minimized to the maximum extent	Prior to Development Permit Approval	Applicant	DSD

Significant Impact	Mitigation Measure (MM)	Implementation Time Frame	Implementation Responsibility	Verification Responsibility
	practicable and mitigated as follows: • As part of the project-specific environmental review pursuant to CEQA, all unavoidable wetland impacts shall be analyzed, and mitigation shall be required in accordance with ratios shown in Tables 11.5-2a and 11.5-2b in the PEIR. Mitigation shall be based on the impacted type of wetland and project design. Mitigation shall prevent any net loss of wetland functions and values of the impacted wetland. • For the Biologically Superior Option, the project shall include avoidance, minimization, and compensatory measures, which would result in a biologically superior net gain in overall function and values of (a) the type of wetland resource being impacted and/or (b) the biological resources to be conserved. The Biologically Superior Option mitigation shall include either (1) standard mitigation per Table 11.5-2a in the PEIR, including wetland creation or restoration of the same type of wetland resource that is being impacted that results in high quality wetlands; and a biologically superior project design whose avoided area(s) (i) is in a configuration or alignment that optimizes the potential long-term biological viability of the on-site sensitive biological resources, and/or (ii) conserves the rarest and highest quality on-site biological resources; or (2) for a project not considered consistent with "1" above, extraordinary mitigation per Table 11.5-2b in the PEIR is required. As part of any future project-specific environmental review pursuant to CEQA, all unavoidable wetlands impacts (both temporary and permanent) shall be analyzed and mitigation required in accordance with the City Biology Guidelines; mitigation shall be based on the impacted type of wetland habitat. Mitigation shall prevent any net loss of wetland functions and values of the impacted wetland. Operational definitions of the four types of activities that constitute wetland mitigation under the ESL Regulations are as follows: • **Wetland creation** is an activity that results in the formation of new wetlands in an upland area. An example is excavation of uplands adjacent to existing wetlands and the establishment of native wetland vegetation. • **Wetland restoration** is an activity that re-establishes the habitat functions of a former wetland. An example is the excavation of agricultural fill from historic wetlands and the re-establishment of native wetland vegetation. • **Wetland enhancement** is an activity that improves the self-sustaining habitat functions of an existing wetland. An example is removal of exotic species from existing riparian habitat. • **Wetland acquisition** may be considered in combination with any of the three mitigation activities above.			

Significant Impact	Mitigation Measure (MM)	Implementation Time Frame	Implementation Responsibility	Verification Responsibility
	Wetland enhancement and wetland acquisition focus on the preservation or the improvement of existing wetland habitat and function and do not result in an increase in wetland area; therefore, a net loss of wetland may result. As such, acquisition and/or enhancement of existing wetlands shall be considered as partial mitigation only for any balance of the remaining mitigation requirement after restoration or creation if wetland acreage is provided at a minimum of a 1:1 ratio. For permanent wetland impacts that are unavoidable and minimized to the maximum extent feasible, mitigation shall consist of creation of new in-kind habitat to the fullest extent possible and at the appropriate ratios. If on-site mitigation is not feasible, then at least a portion of the mitigation must occur within the same watershed. The City's Biology Guidelines and MSCP Subarea Plan require that impacts on wetlands, including vernal pools, shall be avoided, and that a sufficient wetland buffer shall be maintained, as appropriate, to protect resource functions/values. The project specific biology report shall include an analysis of on-site wetlands (including City, state, and federal jurisdiction analysis) and, if present, include project alternatives that fully/substantially avoid wetland impacts. Detailed evidence supporting why there is no feasible less environmentally damaging location or alternative to avoid any impacts must be provided for City staff review, as well as a mitigation plan that specifically identifies how the project is to compensate for any unavoidable impacts. A conceptual wetland mitigation plan (which includes identification of the mitigation site) shall be approved by City staff prior to the release of the draft environmental document. Avoidance shall be the first requirement; mitigation shall only be used for impacts clearly demonstrated to be unavoidable. Prior to the commencement of any construction-related activities on-site for projects impacting wetland habitat (including earthwork and fencing), the applicant shall provide evidence of the following to the Mayor-appointed Environmental Designee prior to any construction activity: • Compliance with ACOE Section 404 nationwide permit; • Compliance with the RWQCB Section 401 Water Quality Certification; and • Compliance with the CDFW Section 1601/1603 Streambed Alteration Agreement.			
Impact 5.5-3: The project could have an adverse effect on migratory wildlife.	**MM-BIO-3:** Mitigation for future projects to reduce potentially significant impacts that would interfere with the nesting, foraging, or movement of wildlife species within the CPU areas shall be identified in site-specific biological resources report prepared in accordance with City of San Diego Biology Guidelines, as further detailed in MM-BIO-1 during the discretionary review process. The biology report shall include results of protocol surveys and recommendations for additional measures to be implemented during construction-related activities; shall identify the limits of any identified local-scale wildlife corridors or habitat linkages and analyze potential impacts in relation to	Prior to Development Permit Approval; and	Applicant; and	DSD; and

Significant Impact	Mitigation Measure (MM)	Implementation Time Frame	Implementation Responsibility	Verification Responsibility
	local fauna, and the effects of conversion of vegetation communities to minimize direct impacts on sensitive wildlife species and to provide for continued wildlife movement through the corridor. Measures that shall be incorporated into project-level construction documents to minimize direct impacts on wildlife movement, nesting, or foraging activities shall be addressed in the biology report and shall include recommendations for preconstruction protocol surveys to be conducted during established breeding seasons, construction noise monitoring and implementation of any species-specific mitigation plans in order to comply with the FESA, MBTA, State Fish and Game Code, and/or the ESL Regulations.	Prior to construction permits and during construction	Developer	DSD
Impact 5.5-4: The project would not have a substantial adverse effect on the City's MSCP.	See **MM-BIO-1** above.	Prior to Development Permit Approval	Project Applicant	DSD
HYDROLOGY AND WATER QUALITY				
Impact 5.6-1: The project would result in an adverse effect on hydrology or water quality associated with runoff.	**MM-HYD/WQ-1:** Prior to approval of development projects implemented in accordance with the CPUs, the applicant shall demonstrate to the satisfaction of the City Engineer, based on the project application, that future projects are sited and designed to minimize impacts on absorption rates, drainage patterns, and surface runoff rates and floodwaters in accordance with current City and San Diego RWQCB regulations identified below. Future design of projects shall incorporate all applicable and practicable measures as further outlined below in accordance with the RWQCB, the City Storm Water Runoff and Drainage Regulations (Chapter 14, Article 2, Division 2 of the LDC), and the LDC, and shall be based on the recommendations of a detailed water quality and hydraulic analysis. A. San Diego RWQCB 1. Comply with all NPDES permit(s) requirements, including the development of a SWPPP if the disturbed soil area is one acre or more, or a Water Quality Control Plan if less than one acre, in accordance with the City's Storm Water Standards. 2. If a future project includes in-water work, it shall require acquiring and adhering to a 404 Permit (from USACE) and a Streambed Alteration Agreement (from CDFW). 3. Comply with the San Diego RWQCB water quality objectives and bacteria TMDL.	Prior to Development Permit Approval (Part A) Prior to Building Permit (Part B)	Project Applicant (Part A) Developer (Part B)	DSD (Part A) DSD (Part B)

Significant Impact	Mitigation Measure (MM)	Implementation Time Frame	Implementation Responsibility	Verification Responsibility
	B. City of San Diego To prevent flooding, future projects implemented in accordance with the CPUs shall be designed to incorporate any applicable measures from the City of San Diego Land Development Code. Flood control measures that shall be incorporated into future projects within an SFHA, or within a 100-year floodway, include but are not limited to the following: 1. Prior to issuance of building permits or approval of any project within or in the vicinity of a floodway or SFHA, all proposed development within a SFHA shall be subject to the following requirements and all other applicable requirements and regulations of FEMA and those provided in Chapter 14, Article 3, Division 1 of the LDC. 2. In all floodways, any encroachment, including fill, new construction, significant modifications, and other development, is prohibited unless certification by a registered professional engineer is provided demonstrating that encroachments shall not result in any increase in flood levels during the occurrence of the base flood discharge except as allowed under Code of Federal Regulations Title 44, Chapter 1, Part 60.3(c) (13). 3. If the engineering analysis shows that development will alter the floodway or floodplain boundaries of the SFHA, the developer shall obtain a Conditional Letter of Map Revision from FEMA. 4. Fill placed in the SFHA for the purpose of creating a building pad shall be compacted to 95 percent of the maximum density obtainable with the Standard Proctor Test Fill method issued by the American Society for Testing and Materials (ASTM). Granular fill slopes shall have adequate protection for a minimum flood water velocity of five feet per second. 5. Improvement plans shall note "Subject to Inundation" for all areas lower than the base elevation plus two feet. 6. If structures will be elevated on fill such that the lowest adjacent grade is at or above the base flood elevation, a Letter of Map Revision based on Fill (LOMR-F) shall be obtained prior to occupancy. The developer or applicant shall provide all documentation, engineering calculations, and fees required by FEMA to process and approve the LOMR-F. 7. In accordance with Chapter 14, Article 3, Division 1 of the LDC channelization or other substantial alteration of rivers or streams shall be limited to essential public service projects, flood control projects, or projects where the primary function is the improvement of fish and wildlife habitat. The channel shall be designed to ensure that the following occur: a. Stream scour is minimized. b. Erosion protection is provided. c. Water flow velocities are maintained as specified by the City Engineer.			

Significant Impact	Mitigation Measure (MM)	Implementation Time Frame	Implementation Responsibility	Verification Responsibility
	d. There are no significant increases or contributions to downstream bank erosion and sedimentation of sensitive biological resources; acceptable techniques to control stream sediment shall include planting riparian vegetation in and near the stream and detention or retention basins. e. Wildlife habitat and corridors are maintained. f. Groundwater recharge capability is maintained or improved. 8. Within the flood fringe of an SFHA or floodway, permanent structures and fill for permanent structures, roads, and other development shall be allowed only if the following conditions are met: a. The development or fill shall not significantly adversely affect existing sensitive biological resources on-site or off site. b. The development is capable of withstanding flooding and does not require or cause the construction of off-site flood protective works including artificial flood channels, revetments, and levees nor shall it cause adverse impacts related to flooding of properties located upstream or downstream, nor shall it increase or expand a FIRM Zone A. c. Grading and filling shall be limited to the minimum amount necessary to accommodate the proposed development; harm to the environmental values of the floodplain shall be minimized including peak flow storage capacity; and wetlands hydrology shall be maintained. d. The development shall not significantly increase or contribute to downstream bank erosion and sedimentation nor cause an increase in flood flow velocities or volume. e. There shall be no significant adverse water quality impacts to downstream wetlands, lagoons, or other sensitive biological resources, and the development shall be in compliance with the requirements and regulations of the NPDES as implemented by the City of San Diego.			
Impact 5.6-2: The project would result in increased runoff.	See **MM-HYD/WQ-1** above.	Prior to Development Permit Approval (Part A) Prior to Building Permit (Part B)	Project Applicant (Part A) Developer (Part B)	DSD (Part A) DSD (Part B)
Impact 5.6-3: The project would result in increased pollutant discharge.	**MM-HYD/WQ-2:** Future projects implemented in accordance with the CPUs shall be sited and designed to minimize impacts on receiving waters, in particular the discharge of identified pollutants to an already impaired water body. Prior to approval of any entitlements for any future project, the applicant shall demonstrate to the satisfaction of the City Engineer that measures to ensure that impacts to receiving waters are fully	Prior to Development Permit Approval	Project Applicant	DSD

Significant Impact	Mitigation Measure (MM)	Implementation Time Frame	Implementation Responsibility	Verification Responsibility
	mitigated in accordance with the requirements of the City's Storm Water Runoff and Drainage Regulations (Chapter 14, Article 2, Division 2 of the LDC) and other appropriate agencies (e.g., San Diego RWQCB). To prevent erosion, siltation, and transport of urban pollutants, all future projects shall be designed to incorporate any applicable storm water improvement, both off- and on-site, in accordance with the City of San Diego Storm Water Standards Manual. These measures may be updated, expanded, or refined when applied to specific future projects based on project-specific design and changes in existing conditions; as well as changes to local, state, and federal laws. Storm water improvements and water quality protection measures that shall be required for future projects include: a. Increasing on-site filtration; b. Preserving, restoring, or incorporating natural drainage systems into site design; c. Directing concentrated flows away from MHPA (Encanto Neighborhoods CPU area only) and open space areas. If not possible, drainage shall be directed into sediment basins, grassy swales, or mechanical trapping devices prior to draining into the MHPA (Encanto Neighborhoods CPU area only) or open space areas; d. Reducing the amount of impervious surfaces through selection of materials, site planning, and narrowing of street widths where possible; e. Increasing the use of vegetation in drainage design; f. Maintaining landscape design standards that minimize the use of pesticides and herbicides; and g. To the extent practicable, avoiding development of areas particularly susceptible to erosion and sediment loss. San Diego RWQCB and Municipal Code Compliance a. The requirements of the San Diego RWQCB for storm water quality are addressed by the City in accordance with the City NPDES requirements and the participation in the regional permit with the San Diego RWQCB. b. Prior to permit approval, the City shall ensure any impacts on receiving waters are precluded or mitigated in accordance with the City of San Diego Storm Water Regulations. c. In accordance with the City of San Diego Storm Water Standards Manual, development shall be designed to incorporate on-site storm water improvements satisfactory to the City Engineer and shall be based on the adequacy of downstream storm water conveyance.			

Significant Impact	Mitigation Measure (MM)	Implementation Time Frame	Implementation Responsibility	Verification Responsibility
HISTORICAL RESOURCES				
Impact 5.7-1: The project could result in an alteration of a prehistoric or historic building, structure, object, or site.	**MM-HIST-1:** Archaeological Resources Prior to issuance of any permit for a future development project implemented in accordance with the CPU area that could directly affect an archaeological resource, the City shall require the following steps be taken to determine: (1) the presence of archaeological resources and (2) the appropriate mitigation for any significant resources which may be impacted by a development activity. Sites may include, but are not limited to, residential and commercial properties, privies, trash pits, building foundations, and industrial features representing the contributions of people from diverse socio-economic and ethnic backgrounds. Sites may also include resources associated with prehistoric Native American activities. Initial Determination The environmental analyst will determine the likelihood for the project site to contain historical resources by reviewing site photographs and existing historic information (e.g. Archaeological Sensitivity Maps, the Archaeological Map Book, and the City's "Historical Inventory of Important Architects, Structures, and People in San Diego") and conducting a site visit. If there is any evidence that the site contains archaeological resources, then a historic evaluation consistent with the City Guidelines would be required. All individuals conducting any phase of the archaeological evaluation program must meet professional qualifications in accordance with the City Guidelines. Step 1: Based on the results of the Initial Determination, if there is evidence that the site contains historical resources, preparation of a historic evaluation is required. The evaluation report would generally include background research, field survey, archeological testing and analysis. Before actual field reconnaissance would occur, background research is required which includes a record search at the SCIC at San Diego State University and the San Diego Museum of Man. A review of the Sacred Lands File maintained by the NAHC must also be conducted at this time. Information about existing archaeological collections should also be obtained from the San Diego Archaeology Center and any tribal repositories or museums. In addition to the record searches mentioned above, background information may include, but is not limited to: examining primary sources of historical information (e.g., deeds and wills), secondary sources (e.g., local histories and genealogies), Sanborn Fire Maps, and historic cartographic and aerial photograph sources; reviewing previous	Prior to Development Permit Approval	Project Applicant	DSD

Significant Impact	Mitigation Measure (MM)	Implementation Time Frame	Implementation Responsibility	Verification Responsibility
	archeological research in similar areas, models that predict site distribution, and archeological, architectural, and historical site inventory files; and conducting informant interviews. The results of the background information would be included in the evaluation report. Once the background research is complete, a field reconnaissance must be conducted by individuals whose qualifications meet the standards outlined in the City Guidelines. Consultants are encouraged to employ innovative survey techniques when conducting enhanced reconnaissance, including, but not limited to, remote sensing, ground penetrating radar, and other soil resistivity techniques as determined on a case-by-case basis. Native American participation is required for field surveys when there is likelihood that the project site contains prehistoric archaeological resources or traditional cultural properties. If through background research and field surveys historical resources are identified, then an evaluation of significance must be performed by a qualified archaeologist. Step 2: Once a historical resource has been identified, a significance determination must be made. It should be noted that tribal representatives and/or Native American monitors will be involved in making recommendations regarding the significance of prehistoric archaeological sites during this phase of the process. The testing program may require reevaluation of the proposed project in consultation with the Native American representative which could result in a combination of project redesign to avoid and/or preserve significant resources as well as mitigation in the form of data recovery and monitoring (as recommended by the qualified archaeologist and Native American representative). An archaeological testing program will be required which includes evaluating the horizontal and vertical dimensions of a site, the chronological placement, site function, artifact/ecofact density and variability, presence/absence of subsurface features, and research potential. A thorough discussion of testing methodologies, including surface and subsurface investigations, can be found in the City Guidelines. The results from the testing program shall be evaluated against the Significance Thresholds found in the Guidelines. If significant historical resources are identified within the Area of Potential Effect, the site may be eligible for local designation. At this time, the final testing report must be submitted to Historical Resources Board staff for eligibility determination and possible designation. An agreement on the appropriate form of mitigation is required prior to distribution of a draft environmental document. If no significant resources are found, and site conditions are such that there is no potential for further discoveries, then no further action is required. Resources found to be non-significant as a result of a survey and/or assessment will require no further work beyond			

Significant Impact	Mitigation Measure (MM)	Implementation Time Frame	Implementation Responsibility	Verification Responsibility
	documentation of the resources on the appropriate Department of Parks and Recreation (DPR) site forms and inclusion of results in the survey and/or assessment report. If no significant resources are found, but results of the initial evaluation and testing phase indicates there is still a potential for resources to be present in portions of the property that could not be tested, then mitigation monitoring is required. Step 3: Preferred mitigation for historical resources is to avoid the resource through project redesign. If the resource cannot be entirely avoided, all prudent and feasible measures to minimize harm shall be taken. For archaeological resources where preservation is not an option, a Research Design and Data Recovery Program is required, which includes a Collections Management Plan for review and approval. The data recovery program shall be based on a written research design and is subject to the provisions as outlined in CEQA, Section 21083.2. The data recovery program must be reviewed and approved by the City's Environmental Analyst prior to draft CEQA document distribution. Archaeological monitoring may be required during building demolition and/or construction grading when significant resources are known or suspected to be present on a site, but cannot be recovered prior to grading due to obstructions such as, but not limited to, existing development or dense vegetation. A Native American observer must be retained for all subsurface investigations, including geotechnical testing and other ground-disturbing activities, whenever a Native American Traditional Cultural Property or any archaeological site located on City property or within the Area of Potential Effect of a City project would be impacted. In the event that human remains are encountered during data recovery and/or a monitoring program, the provisions of Public Resources Code Section 5097 must be followed. In the event that human remains are discovered during project grading, work shall halt in that area and the procedures set forth in the California Public Resources Code (Section 50987.98) and State Health and Safety Code (Section 7050.5), and in the federal, state, and local regulations described above shall be undertaken. These provisions are outlined in the Mitigation Monitoring and Reporting Program (MMRP) included in the environmental document. The Native American monitor shall be consulted during the preparation of the written report, at which time they may express concerns about the treatment of sensitive resources. If the Native American community requests participation of an observer for subsurface investigations on private property, the request shall be honored. Step 4:			

Significant Impact	Mitigation Measure (MM)	Implementation Time Frame	Implementation Responsibility	Verification Responsibility
	Archaeological Resource Management reports shall be prepared by qualified professionals as determined by the criteria set forth in Appendix B of the Guidelines. The discipline shall be tailored to the resource under evaluation. In cases involving complex resources, such as traditional cultural properties, rural landscape districts, sites involving a combination of prehistoric and historic archaeology, or historic districts, a team of experts will be necessary for a complete evaluation. Specific types of historical resource reports are required to document the methods (see Section III of the Guidelines) used to determine the presence or absence of historical resources; to identify the potential impacts from proposed development and evaluate the significance of any identified historical resources; to document the appropriate curation of archaeological collections (e.g. collected materials and the associated records); in the case of potentially significant impacts to historical resources, to recommend appropriate mitigation measures that would reduce the impacts to below a level of significance; and to document the results of mitigation and monitoring programs, if required. Archaeological Resource Management reports shall be prepared in conformance with the California Office of Historic Preservation "Archaeological Resource Management Reports: Recommended Contents and Format" (see Appendix C of the Guidelines), which will be used by Environmental Analysis Section staff in the review of archaeological resource reports. Consultants must ensure that archaeological resource reports are prepared consistent with this checklist. This requirement will standardize the content and format of all archaeological technical reports submitted to the City. A confidential appendix must be submitted (under separate cover) along with historical resources reports for archaeological sites and traditional cultural properties containing the confidential resource maps and records search information gathered during the background study. In addition, a Collections Management Plan shall be prepared for projects which result in a substantial collection of artifacts and must address the management and research goals of the project and the types of materials to be collected and curated based on a sampling strategy that is acceptable to the City. Appendix D (Historical Resources Report Form) may be used when no archaeological resources were identified within the project boundaries. Step 5: For Archaeological Resources: All cultural materials, including original maps, field notes, non-burial related artifacts, catalog information, and final reports recovered during public and/or private development projects must be permanently curated with an appropriate institution, one which has the proper facilities and staffing for insuring research access to the collections consistent with state and federal standards. In the event that a prehistoric and/or historic deposit is encountered during construction monitoring, a Collections Management Plan would be required in accordance with the			

Significant Impact	Mitigation Measure (MM)	Implementation Time Frame	Implementation Responsibility	Verification Responsibility
	project MMRP. The disposition of human remains and burial related artifacts that cannot be avoided or are inadvertently discovered is governed by state (i.e., Assembly Bill 2641 and California Native American Graves Protection and Repatriation Act of 2001) and federal (i.e., Native American Graves Protection and Repatriation Act) law, and must be treated in a dignified and culturally appropriate manner with respect for the deceased individual(s) and their descendants. Any human bones and associated grave goods of Native American origin shall be turned over to the appropriate Native American group for repatriation. Arrangements for long-term curation must be established between the applicant/property owner and the consultant prior to the initiation of the field reconnaissance, and must be included in the archaeological survey, testing, and/or data recovery report submitted to the City for review and approval. Curation must be accomplished in accordance with the California State Historic Resources Commission's Guidelines for the Curation of Archaeological Collection (dated May 7, 1993) and, if federal funding is involved, 36 Code of Federal Regulations 79 of the Federal Register. Additional information regarding curation is provided in Section II of the Guidelines.			
Impact 5.7-2: The project could result in impacts on existing religious or sacred uses or the disturbance of any human remains, including those interred outside of formal cemeteries.	See **MM-HIST-1** above.	Prior to Development Permit Approval	Project Applicant	DSD
PALEONTOLOGICAL RESOURCES				
Impact 5.8-1: The project could have a substantial adverse effect on paleontological resources in a high or moderate resource potential geologic deposit/formation/rock units.	**MM-PALEO-1:** Prior to the approval of subsequent development projects implemented in accordance with the CPUs, the City shall determine the potential for impacts to paleontological resources based on review of the project application submitted, and recommendations of a project-level analysis completed in accordance with the steps presented below. Future projects shall be sited and designed to minimize impacts on paleontological resources in accordance with the City's Paleontological Resources Guidelines and CEQA Significance Thresholds. Monitoring for paleontological resources required during construction activities shall be implemented at the project-level and shall provide mitigation for the loss of important fossil remains with future subsequent development projects that are subject to environmental review. I. Prior to Project Approval A. The environmental analyst shall complete a project-level analysis of potential	Prior to Development Permit Approval (Part A); and During Construction (Part B)	Project Applicant (Part A); and Developer	DSD (Part A) DSD (Part B)

Significant Impact	Mitigation Measure (MM)	Implementation Time Frame	Implementation Responsibility	Verification Responsibility
	impacts on paleontological resources. The analysis shall include a review of the applicable USGS Quad maps to identify the underlying geologic formations, and shall determine if construction of a project would: • Require over 1,000 cubic yards of excavation and/or a 10-foot, or greater, depth in a high resource potential geologic deposit/formation/rock unit. • Require over 2,000 cubic yards of excavation and/or a 10-foot, or greater, depth in a moderate resource potential geologic deposit/formation/rock unit. • Require construction within a known fossil location or fossil recovery site. Resource potential within a formation is based on the Paleontological Monitoring Determination Matrix. B. If construction of a project would occur within a formation with a moderate to high resource potential, monitoring during construction would be required. • Monitoring is always required when grading on a fossil recovery site or a known fossil location. • Monitoring may also be needed at shallower depths if fossil resources are present or likely to be present after review of source materials or consultation with an expert in fossil resources (e.g., the San Diego Natural History Museum). • Monitoring may be required for shallow grading (<10 feet) when a site has previously been graded and/or unweathered geologic deposits/formations/rock units are present at the surface. • Monitoring is not required when grading documented artificial fill. When it has been determined that a future project has the potential to impact a geologic formation with a high or moderate fossil sensitivity rating a Paleontological MMRP shall be implemented during construction grading activities.			
GEOLOGY AND SEISMIC HAZARDS				
Impact 5.9-1: The project would result in exposure of people or structures to geologic hazards such as earthquakes, landslides, mudslides, ground failure, or similar hazards.	**MM-GEO-1:** Impacts associated with geologic hazards shall be mitigated at the project-level through adherence to the City's Seismic Safety Study and recommendations of a site-specific geotechnical report prepared in accordance with the City's Geotechnical Report Guidelines. Impacts shall also be avoided or reduced through engineering design that meets or exceeds adherence to the City's Municipal Code and the California Building Code. More specifically, compressible soils impacts shall be mitigated through the removal of undocumented fill, colluvium/topsoil, and alluvium to firm the ground. Future development shall also be required to clean up deleterious material and properly moisture, condition, and compact the soil in order to provide suitable foundation	Prior to Building Permit	Developer	DSD

Significant Impact	Mitigation Measure (MM)	Implementation Time Frame	Implementation Responsibility	Verification Responsibility
	support. Regarding impacts related to expansive soils, future development shall be required to implement typical remediation measures, which shall include placing a minimum 5-foot cap of low expansive (Expansion Index [EI] of 50 or less) over the clays; or design of foundations and surface improvements to account for expansive soil movement.			
Impact 5.9-2: The project would result in an increase in wind or water erosion of soils.	**MM-GEO-2:** As part of the future development permitting process, the City shall require individual projects to adhere to the Grading Regulation and NPDES permit requirements. All subsequent projects developed in accordance with the CPUs shall also adhere to the California Building Code to avoid or reduce geologic hazards to the satisfaction of the City Engineer. Submittal, review, and approval of site specific geotechnical investigations shall be completed in accordance with the City's Municipal Code requirements. Engineering design specifications based on future project-level grading and site plans shall be incorporated into all future projects implemented in accordance with the CPUs to minimize hazards associated with site-level geologic and seismic conditions satisfactory to the City Engineer and shall include the following measures to control erosion during and after grading or construction: • Desilting basins, improved surface drainage, or planting of ground covers installed early in the improvement process in areas that have been stripped of native vegetation or areas of fill material; • Short-term measures, such as sandbag placement and temporary detention basins; • Restrictions on grading during the rainy season (November through March), depending on the size of the grading operation, and on grading in proximity to sensitive wildlife habitat; and • Immediate post-grading slope revegetation or hydroseeding with erosion-resistant species to ensure coverage of the slopes prior to the next rainy season. Conformance to mandated City grading requirements shall ensure that future grading and construction operations would avoid significant soil erosion impacts. Furthermore, any development involving clearing, grading, or excavation that causes soil disturbance of one or more acres, or any project involving less than one acre that is part of a larger development plan, shall be subject to NPDES General Construction Storm Water Permit provisions. Additionally, any development of this significant size within the City shall be required to prepare and comply with an approved Stormwater Pollution Prevention Plan (SWPPP) that shall consider the full range of erosion control BMPs such as, but not limited to, including any additional site-specific and seasonal conditions. Project compliance with NPDES requirements would significantly reduce	Prior to Grading Permit and During Construction	Developer	DSD

Significant Impact	Mitigation Measure (MM)	Implementation Time Frame	Implementation Responsibility	Verification Responsibility
	the potential for substantial erosion or topsoil loss to occur in association with new development. Prior to obtaining grading permits for future actions a site-specific geotechnical investigation shall be completed as necessary in accordance with the City of San Diego Guidelines for Preparing Geotechnical Reports. Engineering design specifications based on project-level grading and site plans shall be incorporated into the project design to minimize hazards associated with site-level geologic and seismic conditions satisfactory to the City Engineer. Measures designed to reduce erosion at the project-level shall include the following: • Control erosion by minimizing the area of slope disturbance and coordinate the timing of grading, resurfacing, and landscaping where disturbance does occur. • On sites for industrial activities require reclamation plans that control erosion, where feasible, in accordance with the LDC. • Control erosion caused by storm runoff and other water sources. • Preserve as open space those hillsides characterized by steep slopes or geological instability in order to control urban form, insure public safety, provide aesthetic enjoyment, and protect biological resources. • Replant with native, drought-resistant plants to restore natural appearance and prevent erosion. • Practice erosion control techniques when grading or preparing building sites. • Utilize ground cover vegetation when landscaping a development in a drainage area to help control runoff. • Incorporate sedimentation ponds as part of any flood control or runoff control facility. • During construction, take measures to control runoff from construction sites. Filter fabric fences, heavy plastic earth covers, gravel berms, or lines of straw bales are a few of the techniques to consider. • Phase grading so that prompt revegetation or construction can control erosion. Only disturb those areas that will later be resurfaced, landscaped, or built on. Resurface parking lots and roadways as soon as possible, without waiting until completion of construction. • Promptly revegetate graded slopes with groundcover or a combination of groundcover, shrubs, and trees. Hydroseeding may substitute for container plantings. Groundcovers shall have moderate to high erosion control qualities. • Where necessary, design drainage facilities to ensure adequate protection for the community while minimizing erosion and other adverse effects of storm runoff to the natural topography and open space areas.			

Significant Impact	Mitigation Measure (MM)	Implementation Time Frame	Implementation Responsibility	Verification Responsibility
	• Ensure that the timing and method of slope preparation protects natural areas from disturbance due to erosion or trampling. The final surface shall be compacted and spillovers into natural areas shall be avoided. • Plant and maintain natural groundcover on all created slopes. When required, the geologic technical report shall consist of a preliminary study, a geologic reconnaissance, or an in-depth geologic investigation report that includes field work and analysis. The geologic reconnaissance report and the geologic investigation report shall include all pertinent requirements as established by the Building Official. In addition, the Building Official shall require a geologic reconnaissance report or a geologic investigation report for any site if the Building Official has reason to believe that a geologic hazard may exist at the site. Section 145.1803 of the San Diego Municipal Code discusses in more detail the requirements related to the geotechnical report outlined in the SDSSS (City of San Diego 2009).			

Passed by the Council of The City of San Diego on NOV 05 2019, by the following vote:

Councilmembers	Yeas	Nays	Not Present	Recused
Barbara Bry	☒	☐	☐	☐
Jennifer Campbell	☒	☐	☐	☐
Chris Ward	☒	☐	☐	☐
Monica Montgomery	☒	☐	☐	☐
Mark Kersey	☒	☐	☐	☐
Chris Cate	☒	☐	☐	☐
Scott Sherman	☒	☐	☐	☐
Vivian Moreno	☒	☐	☐	☐
Georgette Gómez	☒	☐	☐	☐

Date of final passage NOV 12 2019.

(Please note: When a resolution is approved by the Mayor, the date of final passage is the date the approved resolution was returned to the Office of the City Clerk.)

AUTHENTICATED BY:

KEVIN L. FAULCONER
Mayor of The City of San Diego, California.

(Seal)

ELIZABETH S. MALAND
City Clerk of The City of San Diego, California.

By Linda Irwin, Deputy

Office of the City Clerk, San Diego, California

Resolution Number R- 312739