

DATE ISSUED: February 3, 2011

REPORT NO. PC-11-013

ATTENTION: **Planning Commission, Agenda of February 10, 2011**

SUBJECT: CONNECTIONS HOUSING (1250 SIXTH AVENUE) – CONDITIONAL USE PERMIT/PLANNED DEVELOPMENT PERMIT/NEIGHBORHOOD USE PERMIT NO. 2010-62 FOR A MULTI-USE PROJECT CONSISTING OF 75 PERMANENT SUPPORTIVE LIVING UNITS, 150 TRANSITIONAL HOUSING BEDS, A PRIMARY HEALTH CARE CLINIC, ADMINISTRATIVE OFFICES AND A MULTI-SERVICE HOMELESS CENTER - **PROCESS FIVE**

**OWNER/
APPLICANT:** City of San Diego
Connections Housing Downtown L.P.

SUMMARY

Issue(s): Should the Planning Commission recommend that the City Council approve Neighborhood Use Permit/Conditional Use Permit/Planned Development Permit (CUP/PDP/NUP) No. 2010-62 for the Connections Housing Project (“Facility”)?

Staff Recommendation: Staff recommends that the Planning Commission recommends that the City Council approve CUP/PDP/NUP No. 2010-62 for the Facility subject to conditions as listed in the Draft Permit.

Community Planning Group Recommendation: On January, 29, 2011 the Centre City Advisory Committee (CCAC) voted 14 in favor, 2 opposed, 1 abstention and 2 recusals and the Project Area Committee (PAC) voted 14 in favor, 2 opposed, 1 abstention and 2 recusals to support the staff recommendation.

Environmental Review: This activity is covered under the Final Environmental Impact Report (FEIR) for the San Diego Downtown Community Plan, Centre City Planned District Ordinance, and 10th Amendment to the Redevelopment Plan for the Centre City Redevelopment Project (including all subsequent addenda) certified by the Redevelopment Agency pursuant to Resolution No. R-04001 adopted effective March 14, 2006, in compliance with the California Environmental Quality Act (CEQA). The FEIR is a “Program EIR” prepared in compliance with State CEQA Guidelines Section 15168. An Environmental Secondary Study (ESS) has been prepared for the project to evaluate the project’s compliance with the above documents. Based on the conclusions of the ESS, the environmental impacts of the proposed project were adequately addressed in the FEIR and the proposed project is within the scope of the development program described in the

FEIR. Therefore, no further environmental documentation is required under CEQA.

Fiscal Impact Statement: Expenditure of Redevelopment Agency of the City of San Diego (“Agency”) funds in the total amount not to exceed \$17,000,000 for the acquisition of the World Trade Center (WTC) Building and adjoining 250-stall parking structure are required for the proposed project. Funds in the amount of \$10,000,000 are available in the Fiscal Year 2011 (FY2011) Low and Moderate Income Housing Fund (“Low/Mod Fund”) and \$3,000,000 are available in the FY2011 Social Services budget line item. The amount of \$4,000,000 is available in the FY2011 Core Neighborhood line item for the acquisition of the parking structure.

The transaction will provide the City of San Diego (“City”) with \$8.2 million of funds from the sale proceeds of the Property for the Capital Outlay Fund, which shall be used exclusively for the acquisition, construction and completion of permanent public improvements, pursuant to City Charter Section 77.

This project also has the potential to significantly decrease City and County emergency medical and law enforcement costs as the homeless population is provided with access to housing, medical and social services.

Economic Impact: The project will provide approximately 136 construction jobs and 84 permanent on-going jobs on-site. As of December 31, 2010, approximately 62,000 construction jobs and 23,000 permanent jobs have been created as a result of Downtown redevelopment activities.

Code Enforcement Impact: None.

Housing Impact Statement: The project will create 150 transitional housing beds and 73 permanent supportive living units restricted to 40 percent Area Median Income (AMI) to help meet the housing needs of the chronically homeless.

BACKGROUND

The San Diego Housing Commission (SDHC), in collaboration with the Centre City Development Corporation (“Corporation”) and the City, issued a Request for Proposals (RFP) on April 3, 2009 with a goal to address homelessness by providing housing coupled with supportive services, consistent with the Housing First Model as outlined in the 10-Year Plan to End Chronic Homelessness in the San Diego Region (PTECH). A selection committee was formed, representing the public sector, business community, residents and nonprofit organizations working on homelessness issues in San Diego. After an extensive review process, a developer was selected to rehabilitate the historic WTC building located at 1250 Sixth Avenue into a one-

stop service center and affordable housing for the homeless population.

On October 5, 2010, the Agency approved an Exclusive Negotiation Agreement (ENA) with the Developer to negotiate the terms and conditions of a Disposition and Development Agreement (DDA) for the rehabilitation and operation of the Project. Under the ENA, the Agency and the developer have 270 days to negotiate a DDA and obtain approval of required land use entitlements, with a 90-day option to extend by the Agency’s Executive Director or designee.

Since April 2010, the Developer has conducted extensive community outreach to receive input from the public regarding the proposed Project. A summary of the outreach effort is attached to this report (Attachment 1).

DEVELOPMENT TEAM

ROLE	FIRM/CONTACT	OWNERSHIP
Developer	People Assisting the Homeless (PATH) Ventures, Joel John Roberts	A 501(c)(3) nonprofit corporation (see attached Board of Directors list)
	Affirmed Housing Group (AHG), James Silverwood	James Silverwood Privately Owned
Architect	Architects Richard Bundy and David Thompson	Richard Bundy David Thompson Privately Owned

The development team consists of People Assisting the Homeless and Affirmed Housing Group. PATH is a California-based nonprofit corporation organized in 1984 to meet the needs of homeless and at-risk homeless individuals. PATH operates a successful “one-stop” homeless service center in Los Angeles. PATH will operate the transitional housing (with Alpha Project) and service center, and provide residential service coordination. AHG is an affordable housing developer with a successful track record in building and financing affordable housing projects statewide. AHG will secure financing for the rehabilitation, manage the rehabilitation process, as well as operate the permanent supportive housing.

Family Health Centers of San Diego (FHCS D) will be the operator of the primary health center. FHCS D is a nonprofit community clinic organization, with a mission to provide comprehensive, accessible, quality healthcare services to people of all income levels, with a special commitment to low income and medically underserved individuals. FHCS D operates 29 locations throughout the County, including 12 primary care clinics, three dental clinics, an HIV clinic, and three mobile medical units. FHCS D will operate the medical clinic and services at the project.

DISCUSSION

Project Description:

The proposed project includes the rehabilitation and conversion of the historical WTC building (formerly known as the San Diego Athletic Club) located at 1250 Sixth Avenue into a one-stop service center and affordable housing for the homeless population. The multi-use project consists of 75 permanent supportive living units (includes two manager’s units), 150 transitional housing beds, a primary health care clinic, administrative offices, and a multi-use social service homeless center.

The following is a summary of the project:

Site Area	15,000 square feet
Maximum Floor Area Ratio (FAR) Permitted	10.0
Minimum FAR Required	6.0
Proposed FAR	8.53 (existing)
Stories / Height	12 stories /151 feet
Residential	
Living Units - Permanent Supportive	75 units 47,000 sq. ft. Levels 4-12
Transitional Housing	150 beds 25,000 sq. ft. Levels 2 & 3
Total Residential	225 beds 72,000 sq. ft.
Average Affordability	33% AMI
Non-Residential	
Medical Clinic	13,600 sq. ft. Ground level
Multi-Service Homeless Center	17,300 sq. ft. Basement level
Admin Offices, storage, training	13,400 sq. ft. Sub-basement level
Total Non-Residential	44,300 sq. ft.
Projected Rental Rates	
Supportive Units – Living Units	\$954/mo. (with Section 8 vouchers)
Transitional Housing	\$0
Number of Units Demolished	None
Inclusionary Housing Ordinance Compliance/Number of Affordable Units	225 beds
Parking	
Required*	1 *see parking discussion below
Proposed	0
Assessor’s Parcel Number	534-055-04

The project site is located on the southwest corner of Sixth Avenue and A Street in the Civic Core neighborhood of the Downtown Community Plan Area. The WTC building was constructed in 1928 and uses included athletic facilities, assembly space, offices and 96 sleeping rooms on

the upper floors. The building was converted to office and storage space in the late 1960's. The building is currently being occupied by office uses. Other buildings on the block include a 24-story office building (Union Bank), and a six-level, 250-space public parking garage. The surrounding blocks include a mix of office uses, financial institutions, parking structures and surface parking lots, residential uses, hotels, and commercial uses in buildings of varied heights (Attachment 2).

The Facility will be designed as a one-stop service center where homeless individuals in need can receive information, service needs assessment, case management and referrals to housing, personal care (showers and haircuts), and access to other on-site or off-site service providers. The Facility will host multiple providers for services, including veterans and legal services, benefits advocacy, employment services, case management, substance abuse treatment and housing referrals. The Developer has provided letters of support from some of the proposed service providers, such as Alpha Project, Veterans Villages of San Diego, Homeless Court Program and Legal Aid Society of San Diego. The partner agencies will be responsible for the day-to-day operations of their own programs within the Facility under Memorandums of Agreement with PATH, which will oversee the Facility's program operations and ensure program quality and cohesiveness.

The multi-service homeless center is proposed to be located in the basement with an entrance located on A Street and will contain office spaces for individual service providers, meeting rooms, computer/training rooms, an employment/job center, partner agency suites and cubicles, a commercial kitchen and café, and client bathroom/shower facilities. The sub-basement level will provide space for administrative office space, storage, meeting rooms and equipment rooms.

The health clinic and main reception area, to be leased and operated by FHCSO, will be located on the first floor. The reception area will include a large space for waiting clients, restrooms, offices for intake/assessment and case management. The medical clinic will have a separate entrance on Sixth Avenue and a waiting room.

The health clinic will provide comprehensive primary care, medical and mental health services, allowing homeless individuals to access health care as part of their regular routine of services.

The 150 transitional housing beds will be located on the second and third floors with an entrance on A Street. There will be approximately 94 beds for men on the second floor and 56 beds on the third floor. The beds will be set up in cubicles with individual twin beds (not bunk-bed style). Each floor will have a small residential community kitchen, common lounge areas, laundry facilities, small lockers for each resident and staff offices. Residents entering the 150 transitional housing beds will sign house rules that are designed to ensure the community's safety and security.

The 75 permanent supportive living units (includes two manager units) will be located on floors 4-12 with an entrance on Sixth Avenue. Common areas and support facilities such as computer rooms and storage will be scattered between floors. Occupancy and rent for the living units will be restricted to persons with household income at or below 40 percent AMI. The supportive housing units will operate like any other apartment building, where each resident will sign a lease with specific building rules. Any illegal behavior in or around the building will not be allowed, and will be grounds for eviction from the housing.

All residents of the building will be screened to ensure compliance with Megan's Law (preventing sex offenders from residing at this location). Intake specialists will also perform intensive interviews. The Developer will provide private security licensed and in good standing with the State of California. Minimum staffing will include: one security guard present at the Facility all times (24 hours), one additional security guard on one hour before and on duty during business hours for the multi-service homeless center and medical clinic, and one additional security guard in the evening hours for the permanent supportive housing. The health clinic will also have an additional security team on call should a crisis occur. Security cameras will monitor activity within the building and along the sidewalk adjacent to the building. Cameras will be installed at all exterior entrances, exterior corners outside of the building, interior stairs and elevators, and in the main hall of the multi-service homeless center. Security personnel will monitor video cameras. Security guards will have another staffer provide coverage when they periodically leave the monitoring station to patrol interior or exterior areas or respond to incidents. It is anticipated that the multi-service homeless center will be open seven days of the week, and will be open no earlier than 6 a.m. and close no later than 9 p.m. The health clinic may be open during the following hours: Monday through Friday open no earlier than 6 a.m. and close no later than 9 p.m., Saturday open no earlier than 8 a.m. and close no later than 5 p.m., Sunday open no earlier than 8:00 a.m. and close no later than 12:00 p.m.

Proposed Rehabilitation

The proposed rehabilitation scope includes repair and restoration of ornamental features, storefronts and painting consistent with Secretary of Interior's Standards for Rehabilitation and the City's Regulations for Historical Resources. In addition, accessibility upgrades and improvements will be completed in compliance with California Building Code, Life and Safety requirements.

The proposed rehabilitation will incorporate green building measures wherever possible to make the project environmentally sustainable. Specific measures include: new lighting and energy management systems utilizing Title 24 compliant fixtures and motion sensors that control common area lighting; a new variable volume mechanical system that allows individual control of heating and cooling for each space; a new plumbing piping system that will maximize efficiency of the water system and ultra-low-flow plumbing fixtures; and, recycling of construction waste. Draft architectural plans are attached to this report as Attachment 3.

Project Analysis:

Permitted land uses and development standards for this area of Downtown are established in the Centre City PDO. As previously mentioned, the site at 1250 Sixth Avenue is located within the Civic Core land use district which serves as a high-intensity office and employment center. Under the PDO, a CUP is required for the on-site provision of social services and transitional housing within this district. The site is also located within the Employment Required Overlay Zone which requires at least 50 percent of the gross floor area (GFA) within a development to be dedicated to employment uses such as professional office, education, cultural uses, retail, hotel or other similar commercial uses. Residential uses in this district cannot exceed more than 50 percent of the GFA against the base FAR. In addition, floor area currently devoted to employment uses may not be converted to non-employment uses within this overlay zone. However, the PDO permits uses not otherwise permitted within historical buildings through the review of a CUP, as discussed below.

Parking Requirements

The Facility is proposing to not provide off-street parking for its operations (it should be noted that the adjoining parking structure is located on another property and is not part of this project). The PDO exempts living units from parking requirements when their affordability level is restricted to at or below the 40 percent AMI income and rent levels. However, unrestricted units are required to provide 0.5 spaces per unit. The project includes two unrestricted managers' living units requiring a total of 1 parking space per the PDO. Due to the historical nature of the existing building parking cannot be accommodated on-site. Under the PDO the proposed conversion of a commercial building to a residential use that cannot meet the parking requirements may be granted a deviation to the parking requirements with approval of an NUP. Parking requirements for transitional housing facilities are established through the CUP review process, and the Facility is proposing (with staff support) that no parking be required for this use as the residents will be formerly homeless individuals. The one-stop multi-service center and offices are also exempt from parking requirements as they will be located in an existing building and conversions from one commercial land use to another are exempted from parking requirements under the PDO. Employees of the project requiring parking can secure monthly parking passes from public parking facilities nearby similar to other commercial uses in the area.

Neighborhood Advisory Committee

During the community outreach process prior to the ENA approval, the Developer made a commitment to form a Neighborhood Advisory Committee (NAC) to provide input on operation of the facility and conditions of the CUP/PDP, including on-site security, queuing and loitering prevention, rules of resident and patient conduct and hours of operations. On October 5, 2010, the Agency passed a motion to require the Developer to form an NAC within 60 days and include at least three seats for representatives of the Downtown San Diego Partnership, San Diego

Building Owners and Manager's Association (BOMA) and NEIOP, a commercial real estate development association.

The Developer formed the NAC and has held three meetings to date at the WTC building (November 10, 2010, December 13, 2010 and January 5, 2011). At these meetings, the NAC reviewed the proposed uses, security and loitering prevention plan and resident conduct rules to be incorporated into the CUP/PDP. On January 4, 2011, the Developer also hosted a meeting of adjacent property owners, residents and tenants of the commercial buildings located within 300 feet of the site.

Conditional Use Permit

A CUP is required for this Facility for the following uses:

1. Social Services.
2. Transitional Housing.
3. Uses not otherwise permitted within a historical resource.

The CUP procedure establishes a review process for the development of uses that may be desirable under appropriate circumstances, but are not permitted by right. The intent of these procedures is to review these uses on a case-by-case basis to determine whether, and under what conditions, such a use may be approved at a given site.

Approval of a CUP requires that certain findings be made as listed below, thereby requiring an evaluation of the project's compatibility with the surrounding neighborhood.

Under Section 126.0305 of the San Diego Municipal Code, the following four findings must be made in order to approve a CUP, as follows:

1. *The proposed use or development will not adversely affect the applicable land use plan.*

The proposed project includes the rehabilitation and adaptive reuse of an existing designated historical resource into a one-stop service center and housing for the homeless. The facility will include a multi-use social service center, a medical clinic, 150 transitional housing beds, and 75 permanent supportive living units.

The Facility will provide a valuable service critical in assisting the chronically homeless population. It is the goal of the Downtown Community Plan to allow health and human service facilities areawide, while minimizing impacts to surrounding land uses, and balancing provisions of services to populations in need of assistance. The Downtown Community Plan envisions that these facilities employ a continuum of care approach whereby multiple services are provided on-site.

In addition, the project proposes to retain, rehabilitate and adaptively reuse the WTC; an important historical resource for downtown San Diego. The Downtown Community Plan encourages the rehabilitation and reuse of historical resources as a cultural and sustainability goal. Therefore, the project as proposed does not adversely affect the applicable land use plan, but rather meets several key goals of the Downtown Community Plan.

2. *The proposed use or development will not be detrimental to the public health, safety, and welfare.*

The proposed use will not be detrimental to, but rather contribute to, public health, safety, and welfare by providing homeless members of the community with needed services and living facilities in a one-stop location. The proposed conditions of approval have been designed to address potential public health and safety concerns within the surrounding neighborhood. The facility will be required to implement protocols to avoid off-site impacts from clients including a Litter and Loiter control plan which makes the applicant responsible for keeping the site and a one-block area surrounding the site free of graffiti, litter, trash and other nuisances. The operator will establish and enforce policies to discourage littering and loitering in and around the property. All persons visiting the facility for services will be required to wait indoors to avoid any lines outside the facility. Adequate lighting will be provided to illuminate entrances to provide surveillance opportunities of the neighborhood by the public, employees, residents and visitors.

Residents entering the transitional housing facility will be required to sign rules of conduct designed to ensure the safety and security of both the residents and the community. Residents of the permanent supportive living units will sign a lease with specific building rules and any illegal behavior in or around the building will not be allowed, and will be grounds for expulsion. Twenty-four hour security will be provided for protection of project residents, clients and the surrounding neighborhood.

In addition, the formation of the NAC has been included as a condition of approval. The NAC will meet regularly to assess the impacts, recommend solutions to enhance collaboration, and provide a vehicle for accountability for the operator(s) of the Facility.

The rehabilitation of the existing building will greatly improve the surrounding area as it will consolidate uses, provide a more attractive building and improve the quality of life for a neglected segment of the population.

3. *The proposed use or development will comply to the maximum extent feasible with the regulations of the Land Development Code.*

The proposed Facility is located within the Civic Core District which allows for a variety

of uses including office, hotel, educational and residential uses. Social service uses and transitional housing are permitted with the approval of a CUP subject to reasonable conditions of approval. The Facility is also located within the Employment Required Overlay Zone, which requires 50 percent of the GFA to be devoted to employment uses. While social services, transitional housing, and residential living units are not considered employment uses; the PDO allows historical resources to be occupied by uses otherwise not allowed by the underlying zoning subject to specific conditions. The Facility as proposed will comply with such conditions and will operate in conformance with the regulations of the Land Development Code (LDC), the Downtown Community Plan, and the Centre City PDO to the maximum extent feasible.

4. *The proposed use is appropriate at the proposed location.*

The proposed project implements the goals and objectives of the Downtown Community Plan by providing transitional housing and permanent supportive housing to meet the needs of the chronically homeless, providing a social service facility that provides assistance to people who are homeless or at risk of homelessness, and rehabilitates a designated historical building for adaptive reuse. The Developer has formed a NAC to ensure impacts to the community are relayed to the operator and quickly remediated. The project site is located within the Civic Core District which allows the proposed uses with the approval of an NUP/CUP/ PDP and is located near a transit corridor making it accessible to the residents and clients of the facility, most of whom walk or use public transit; therefore, the proposed use is appropriate at the proposed location.

Social services, transitional housing, and residential living units are not considered employment uses under the PDO; therefore, a CUP is required to allow the non-employment uses of the Facility to exceed 50 percent of the GFA within the Employment Required Overlay District, which may be allowed under the PDO for a designated historical resource subject to the following regulations:

1. *The building must be designated as a historical resource by the City of San Diego Historical Resources Board before approval of the Conditional Use Permit.*

The property at 1250 Sixth Avenue is locally designated HRB Site # 685 – World Trade Center building. It was built in 1928 and originally known as the San Diego Athletic Club. The City acquired the building in 2004 and has used it as an office building. The building’s design is primarily Art Deco with Gothic Revival details and is a rare example of the “New York Skyscraper” influence in San Diego.

According to the building assessment prepared by Heritage Architecture and Planning, the building’s interior finishes were significantly altered during the conversion of the building from an Athletic Club to office space, and the original character of the interior is

no longer evident and cannot be defined. The majority of the historic detailing and cast-stone ornamentation on the building's exterior are still extant.

2. *The use of the building shall be compatible with the uses in the surrounding area or shall be consistent with the purpose for which the building was originally designed.*

The area surrounding the WTC is primarily commercial/office. The building is currently owned by the City and has been occupied by office uses since 1993. The proposed combination of office and residential uses are similar to the original use of the building. The original Athletic Club building included athletic facilities, assembly space, offices and 96 sleeping rooms on the upper floors.

With the approval of the appropriate discretionary permits including the NUP, CUP and PDP and applicable conditions of approval, the proposed use will be compatible with the surrounding uses and consistent with the purpose for which the building was originally designed.

3. *The site shall be maintained in, or restored to, its original or historical appearance, in accordance with Chapter 14, Article 3, Division 2 (Historical Resources Regulations).*

As part of this project, the Developer proposes to rehabilitate the building in accordance with the Secretary of the Interior's Standards for Rehabilitation. The proposed rehabilitation has been reviewed by HRB staff and found to be a minor alteration or improvement consistent with City Chapter 14, Article 3, Division 2 (Historical Resources Regulations) and the Secretary of the Interior's Standards for Rehabilitation. The proposed repairs and alterations will preserve a historical resource, allow a contemporary use, and will not damage or destroy materials, features or finishes that are important in defining the building's historic character.

Planned Development Permit

Living Units and Transitional Housing are considered separately regulated uses under the PDO and LDC and are subject to special development regulations. The existing floor layout of the historical building limits the ability of the developer to strictly apply these development regulations; therefore, a PDP is required to allow for any requested deviations from the development standards of the PDO for the living units and from the transitional housing requirements of the LDC.

The Developer is proposing to construct 75 permanent supportive living units, including two manager's units, on floors 4-12 of the building. In order to accommodate the 75 living units within the existing floor layout of the historical building, the Developer is seeking deviations from the following development regulations of the PDO:

1. **Living Unit Size** - The PDO limits the floor area of Living Units to an average size of 300 square feet, with any individual unit not exceeding 400 square feet. As a result of the existing floor plan layout, large windows and historical resource designation of the property, the proposed floor plan layout of the living units will range in size from 285 to 640 square feet, with an average unit size of 390 square feet.
2. **Common Space** - The PDO requires that each living unit project provide common interior space at a ratio of 50 square feet per living unit.
The Facility proposes to provide approximately 46 square feet of common space per living unit.

In addition to the deviations of the PDO, the Developer is requesting the following deviations to the LDC development standards for transitional housing:

1. **Sleeping Area**- The LDC requires that transitional housing facilities provide at least 70 square feet of sleeping space for each resident, not including closet or storage space, multi-purpose rooms, bathrooms, dining rooms, and halls. The Facility proposes to provide approximately 42 square feet per bed. Based on experience in operating a similar facility with approximately 40 square feet per bed in Los Angeles, the applicant has indicated that providing a smaller space has proven successful.
2. **Bathroom Facilities**- The LDC requires one full bathroom including sink, toilet, and shower or bathtub for every seven beds. The Facility will provide bathrooms that contain toilets, sinks, and showers for both the women's and men's floors. In order to accommodate the number of people in the Facility these bathrooms will be communal. The Facility will provide one shower, one sink and one toilet for every seven beds in compliance with the LDC for the women's floor (third floor). However, one shower, one sink, one toilet per 12 beds and one urinal for every 11 beds will be provided for the men's floor (second floor). The Developer has operated at a similar facility in Los Angeles containing approximately one fixture per 13 beds, and therefore feels confident that the number of fixtures provided will be sufficient for the residents of the transitional housing. In addition, due to the existing floor layout, the addition of more bathroom fixtures would reduce the number of beds in the floor plan.

The purpose of the PDP procedures is to establish a review process for development that allows an applicant to request greater flexibility from the strict application of the regulations. The findings for approval of a PDP listed below are evaluated to determine if the proposed deviations facilitate a project that is beneficial to the community and results in a more desirable project than could otherwise be achieved if the project were required to rigorously adhere to the development regulations.

In order to grant approval of a PDP, the following findings must be made:

1. *The proposed use or development will not adversely affect the applicable land use plan.*

The proposed project is consistent with the objectives of the Downtown Community Plan and the Centre City PDO by rehabilitating and re-using a locally designated historical resource. The requested deviations will provide relief from the strict application of the development standards in order to allow for more efficient use of the space given the constraints associated with the historical designation of the building and the proposed program of the Facility to address the special needs of the services being provided to the homeless population. The requested deviations meet the intent of the regulations and will have a negligible impact on the surrounding neighborhood.

2. *The proposed use or development will not be detrimental to the public health, safety, and welfare.*

The deviations to allow for the increased size of living units and deviations for transitional housing, including living area per bed, storage areas and restroom facilities are minor given the constraints of the existing building floor layout and will not have an impact on the public health, safety and general welfare. Overall the project provides a significant enhancement to the public health, safety and general welfare by providing essential services and housing for the chronically homeless population of downtown San Diego.

3. *The proposed use or development will comply to the maximum extent feasible with the regulations of the Land Development Code.*

As discussed earlier in this report, the proposed project is consistent with the goals and policies of the Downtown Community Plan. Approval of the proposed deviations from the development regulations of the PDO and LDC for living units and transitional housing will result in the ability to provide much needed social services and housing consistent with the Downtown Community Plan. With approval of the PDP, the project will comply to the maximum extent feasible with all applicable regulations.

4. *The proposed development, when considered as a whole, will be beneficial to the community.*

The proposed project is compatible with existing and planned land uses in the surrounding neighborhood and overall downtown area and will provide much needed services, health care, and housing (both transitional and permanent) for the growing homeless population in downtown. The development of a one-stop service center and housing facility is beneficial to the community at large given the increased homeless population in downtown San Diego and the limited availability of services and housing.

Integrating services and housing into one facility is cost effective, provides consistent quality of care, provides for better coordination between services, and ultimately ensures that more people get the services and housing they need to become contributing members of society. The benefits of the proposed project heavily outweigh any of the minor impacts associated with the proposed deviations. In addition, the approval of the deviations will result in the rehabilitation and adaptive reuse of an underutilized historical building, and will add to the diversity of uses in the neighborhood.

5. *Any proposed deviations pursuant to Section 126.0602(b)(1) are appropriate for this location and will result in a more desirable project than would be achieved if designed in strict conformance with the development regulations of the applicable zone.*

The proposed deviations are appropriate for the project due to the existing floor layout, large windows and historical nature of the building. The building will be upgraded to be fully accessible and the improvements will comply with the California Building Code, Life and Safety requirements and the Secretary of the Interior's Standards for Rehabilitation. It is appropriate to allow flexibility from the development standards of the PDO and LDC for living units and transitional housing in order to make more efficient use of the space, provide more livable units for residents, and comply with the Secretary of the Interior's Standards, thereby resulting in a more desirable project. The deviations will allow the Developer to successfully operate and provide services and housing advancing the visions and goals of the Downtown Community Plan by providing services and housing to the chronically homeless.

Neighborhood Use Permit

Under the PDO, the proposed conversion of a building from commercial to a residential use requires the provision for off-street parking. While living units restricted to at or below 40 percent AMI income and rent levels are exempt from the parking requirements of the PDO, unrestricted living units are required to provide 0.5 spaces per unit. The proposed project includes two unrestricted manager's units thereby requiring a total of 1 off-street parking space. Managers' units are typically unrestricted to allow for greater flexibility for hiring on-site residential managers. The historical nature of the building limits the ability of the developer to make accommodations for one off-street parking space. Therefore, an NUP is required to allow for any requested deviations from the parking requirements of the PDO for the unrestricted managers' living units.

The NUP procedure establish a review process for developments that propose new uses, changes to existing uses, or expansions of existing uses that could have limited impacts on the surrounding properties. The intent of these procedures is to determine if the development complies with all applicable regulations of the zone and any supplemental regulations pertaining to the use, and to apply conditions that may be necessary to help ensure compliance.

Approval of an NUP is an administrative approval by the Corporation appealable to the Corporation Hearing Officer; however, under the San Diego Municipal Code's consolidated processing when an applicant applies for more than one permit or other approval for a single project, the applications are consolidated for processing and a reviewed by a single decision maker at the highest level of authority.

Under Section 126.0205 of the San Diego Municipal Code, the following four findings must be made in order to approve an NUP, as follows:

1. *The proposed use or development will not adversely affect the applicable land use plan.*

The Centre City PDO allows a deviation to the parking requirements with approval of a NUP for any building that cannot meet these requirements. This deviation is intended to encourage the adaptive re-use and rehabilitation of historical resources consistent with the goals and policies of the Downtown Community Plan. Given the constraints associated with the historical designation of the building the developer cannot accommodate off-street parking. Allowing the project to be built without the one required parking space will not result in any adverse impacts to the applicable land use plan.

2. *The proposed use or development will not be detrimental to the public health, safety, and welfare.*

The deviation to not require the construction of one parking space for the project will not have a detrimental impact to the public health, safety and welfare. As a whole the proposed project results in a significant benefit to the community by preserving and adaptively re-using a historical building and providing housing and services to the chronically homeless population.

3. *The proposed use or development will comply to the maximum extent feasible with the regulations of the Land Development Code.*

The LDC specifically contains regulations to allow minor deviations from specific development regulations, including parking. With approval of the NUP, the project will meet all applicable regulations.

4. *The proposed use is appropriate at the proposed location.*

The project site is located within the Civic Core District which allows the proposed use with approval of a CUP/PDP/NUP. The proposed project will rehabilitate a designated historical building for adaptive reuse consistent with the goals and policies of the Downtown Community Plan and will provide the homeless or people at risk of homelessness with essential social services, transitional housing and permanent

supportive housing in a one-stop facility located near transit. Therefore, the proposed use is appropriate at the proposed location.

A draft CUP/PDP/NUP is attached to this report as Attachment 4.

Community Plan Analysis

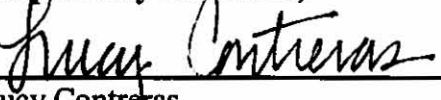
The proposed project advances the Visions and Goals of the Downtown Community Plan and the Objectives of the Centre City Redevelopment Project by:

- Providing transitional housing and permanent supportive housing to meet the housing needs of the chronically homeless,
- Providing a human service facility that provides assistance to people who are homeless or at risk of homelessness,
- Rehabilitating a designated historic building for reuse, and
- Pursuing a diversity of facilities to meet the long- and short-term medical needs of downtown residents, the poor, visitors and employees.

Conclusion:

The project is consistent with the Downtown Community Plan and complies with all requirements of the Centre City PDO and LDC to the greatest extent feasible given the goals and program of the Facility. The services provided by the Facility are vital for the downtown homeless population. The consolidation of services and housing will provide people living on the streets with the tools to overcome their struggles and provide access to permanent housing. Staff recommends that the findings for approval of a CUP/PDP/NUP can be made and is recommending conditions be incorporated into the permit to mitigate any concerns from the surrounding neighborhood related to the impacts associated with the facility including, but not limited to, conditions addressing on-site security, lighting, prevention of queuing and loitering, and rules of conduct and hours of operation.

Respectfully submitted,



Lucy Contreras
Associate Planner



Brad Richter,
Assistant Vice President Planning



Frank Alessi, Executive VP & Chief Financial Officer

Attachments:

1. Summary of Community Outreach
2. Project Location Map
3. Draft Architectural Plans
4. Draft Permit with Conditions
5. Environmental Secondary Study
6. PATH Board of Directors

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Community Outreach Update October through December 2010

Service Provider Outreach Conducted

1. September 19th-23rd: Members of the PATH Street Outreach Team participated in San Diego's Registry week.
2. October 26th: Attended Regional Task Force for the Homeless press conference
3. October 28th: Met with Amy Gonyeau from Alpha Project
4. October 29th: Met with Paige Hazard, Deputy City Attorney, to inform her about Connections Housing and speak with her regarding the Homeless Court System.
5. November 3rd: Toured Veterans Village of San Diego; met with David Siegler
6. November 10th: Toured the Friend to Friend program through Episcopal Community Services, met with Sarah Koenigsberg, director of the program, and Holly Younghans, Vice President of Housing and Supportive Services.
7. November 10th: Toured Jane Westin Walk-in Center with Community Research Foundation, spoke with Jack Farmer about partnering with CRF at the PATH Depot.
8. December 9th: Toured YWCA Cortez Hill Family Center, met with Beatriz Cornego and George Ossavou, Co-Program Managers.
9. December 9th: Met with McAlister Institute and Family Health Centers San Diego to discuss potential partnership with McAlister. Spoke with Toni Occhipinti, Corporate Services Director, and Denise Wagner, Quality Assurance Director.
10. December 14th: Conducted Outreach with the Episcopal Community Services Friend to Friend Outreach Team at the Veterans winter shelter tent.
11. December 16th: Toured Rachel's Women's Center, spoke with Martha Ranson about creating a space which is welcoming towards women.



Community Outreach Update October through December 2010

Community Outreach Conducted: **STAKEHOLDERS/NEIGHBORS**

1. October 12, 2010: Attended CCAC Social Issues Sub-Committee meeting with FHCSO, briefed the group regarding the Neighborhood Advisory Committee.
2. October 29th: Conducted a ride-along with Fax Hall, SGI Program Manager of the Downtown Partnership Clean and Safe Team.
3. November 10th, 2010: **First Neighborhood Advisory Committee** meeting.
4. Week of November 15th: Distributed Connections Housing November Community Update to properties within a 300 ft radius of the World Trade Center.
5. December 7th: Met with Hines GS property management team; informed them about the Neighborhood Advisory Committee progress and answered questions.
6. December 8th: Met with Ryan Blum, Assistant Property Manager with Equity Office at 701 B Street. Informed him about Connections Housing Progress in the neighborhood.
7. December 13th: **Second Connections Housing Neighborhood Advisory Committee**
8. December 14th: Met with Yvette Magana, Assistant Property Manager with Legacy Partners, 600 B Street. Informed her of progress in the neighborhood. Spoke with Officer Palmer, front desk security staff for the building.
9. December 16th: Spoke about PATH at the Downtown Church and Ministry Fellowship, informed the group about progress in the neighborhood.
10. December 16th: Spoke with security officers at 450 B Street, informed them of PATH's progress in the Neighborhood. Security officers redirected Connections Housing staff to Colliers Management Company.

11. December 16th: Spoke with Security officer at 530 B Street; he mentioned there is not as much homeless activity around the building as there has been before. Spoke with Brittany Nelson and Joy Cole from Jones Lang LaSalle property management; updated them about Connections Housing community activities.
12. December 16th: Spoke with officers Jack and Danny from security at 401 B street, informed them of Connections Housing progress in the community.
13. December 16th: Spoke with Susana on the security team at 525 B Street regarding Connections Housing progress in the community.
14. Week of December 20th: Distributed Connections Housing December Update to properties within a 300 ft radius of the World Trade Center.
15. January 4th: Community Question and Answer Meeting For Tenants and Owners.
16. January 5th: **Third Connections Housing Neighborhood Advisory Committee.**



Community Outreach Update

June 28, 2010

At the April 21, 2010 Land Use and Housing Sub-Committee, Connections Housing (PATH, Family Health Centers of San Diego, and Affirmed Housing) was asked to accomplish three tasks in 60 days: (1) perform community outreach, (2) link the development to a region-wide plan, and (3) show that the development is part of the solution to the city's homeless lawsuit.

Below is an update:

Community Outreach

- 15 **public community meetings** with business groups, neighborhood associations, and public forums. Numerous small group and one-on-one meetings.
- Sent an **outreach mailer** to 2,000 residents and businesses within ¼ mile of the facility.
- Over 75 people attended an **open house** at the facility.
- Created an informational **website** (www.sdconnections.org), and an email response system for people with questions.
- Offered a **tour** to the Los Angeles PATH Mall.
- Met with **public agencies**: SD Police Chief (coordinate SDPD HOT team with the center), SD EMS Medical Director (coordinate homeless "frequent flyers" with the center), County departments, and Housing Commission.
- Created a draft **Neighborhood Covenant** (Conditional Use Permit) using the SD Rescue Mission as a model. Also, set up guidelines for a Neighborhood Advisory Board.
- Performed a **Neighborhood Homeless Survey** of the blocks surrounding the facility – with the assistance of the SD HOT Teams, Alpha Project.

Regional Plan

- Connections Housing fits into the **San Diego Ten Year Plan to End Homelessness**
- Created a **replicable local neighborhood model** where the center becomes a solution to reducing street homelessness within the surrounding area, and other SD neighborhoods in the region want to do the same.
- Met with, or scheduled to meet with, **San Diego regional planning groups**, including the San Diego Regional Task Force on Homelessness, SD United Way, and the SD Regional Continuum of Care.
- **Adjusted design and program to coordinate with other downtown services.** Recommended that the Neil Good Day Center and the Veterans Winter Beds continue to operate the first few years of opening WTC.
- **Recruited other San Diego homeless service partners:** Alpha Project (interim housing), Legal Aid Foundation of SD (public benefits and legal assistance), Workforce Partnership (employment), SDPD Homeless Outreach Teams (street outreach), and Downtown Interfaith Group (food, volunteers).

Details – Community Outreach

PUBLIC AND LARGE GROUP PRESENTATIONS

- 5/4 ◦Homeless Services Providers – Father Joe’s, VVSD, Alpha Project, Catholic Charities, Interfaith Shelter, Regional Continuum of Care, United Way
◦Center City Advisory Committee Social Issues Committee
- 5/11 ◦Chamber of Commerce Land Use and Housing Committee
- 5/12 ◦Chamber of Commerce Healthcare Committee
- 5/17 ◦BOMA/NAIOP
- 5/19 ◦Center City Advisory Committee
- 5/20 ◦Downtown Partnership Homeless Task Force
◦East Village Community Action Network
- 5/25 ◦Regional Continuum of Care Consortium
- 5/26 ◦Downtown Partnership Homeless Forum
◦Gaslamp Quarter Association Board of Directors
- 6/3 ◦Mental Health Housing Council
◦East Village Association Board of Directors
- 6/8 ◦Little Italy Association Board of Directors
- 6/9 ◦Downtown Residents Group
- 6/14 ◦Downtown Church and Ministry Fellowship
- 6/15 ◦Chamber of Commerce Public Policy Committee
- 6/16 ◦Center City Advisory Committee
- 6/23 ◦Community Planners Committee
- 6/27 ◦National Alliance on Mental Illness San Diego

PRIVATE AND ONE-ON-ONE MEETINGS

- 5/3 ◦Workforce Partnership
- 5/10 ◦Key leaders of Downtown Partnership hosted by Rob Lankford
◦San Diego Fire/Rescue and Emergency Medical Services, hosted by Jim Dunford

- Cox Communications
- 5/17 ◦County of San Diego Health and Human Services and Supervisor Ron Roberts' office
- Chief Bill Lansdowne
- 5/18 ◦Greg Knoll, Legal Aid
- Alpha Project
- 5/24 ◦Bridgepoint Education
- Kiddie Hall Childcare Center
- 6/4 ◦San Diego Symphony
- 6/8 ◦Jason Hughes, Irving Hughes
- 6/21 ◦Clay King, Chief, Social Work Service, VA
- 6/26 ◦San Diego Rescue Mission

UPCOMING MEETINGS

- Westfield/Horton Plaza
- Chamber of Commerce Board of Directors
- Gaslamp Quarter Association Retail and Hospitality Committees
- Cortez Hill residents
- Little Italy Residents
- Navajo Planning Group
- San Diego Human Relations Commission

OTHER MEETINGS REQUESTED

- Rotary 33: Declined. No room on schedule
- Cortez Neighbors Group: No initial concerns, didn't want presentation, offer left open if needed in the future
- Ecumenical Council: No response
- Downtown Lions Club: No response
- Economic Develop Corporation: Declined, not a long term economic issue
- Downtown Soundbites: Declined. No room on schedule.
- Downtown Breakfast Rotary: Declined. No room on schedule

OTHER ACTIVITIES

- 5/11 Letter to every resident, tenant, and property owner within ¼ mile radius of World Trade Center – 2200 count – providing details of proposed facility, contact information, and invitation to Open House
- 5/10 Website www.sdconnections.org goes live. Includes a "Contact Us" email. We received 5 emails at that address – 3 offering support, 1 from a homeless person seeking services, 1 requesting a presentation to the Navajo Planning Committee and 1 nearby resident wanting information about how the facility would impact the neighborhood. We have also received several endorsement forms through the website.
- 5/17 and 5/18 PATH Outreach Team, Alpha Outreach Team, and SDPD HOT Team (Homeless Outreach) conduct street count and interview representative sample of homeless people in Core Downtown area.

- 5/24 World Trade Center Open House and Tours. 75 attendees.
- 6/4 Offered a transportation provided tour of PATHMall in Los Angeles. Cancelled due to lack of participation. Several groups and individuals have visited the PATHMall on their own, including the Los Angeles regional staff of the corporation that owns the childcare center across the street from the World Trade Center, Dr. Jim Dunford and several people from City of San Diego Emergency Medical Services, a City Council staff member, a Housing Commission staff member, and a representative of the Center for Justice and Social Compassion.

MATERIALS DISTRIBUTED AND AVAILABLE THROUGH WEBSITE

- Connections Housing Fact Sheet
- Connections Housing Frequently Asked Questions
- Draft Neighborhood Covenant
- Draft Neighborhood Advisory Board Overview
- Core Area Homeless Count Map
- Core Area Homeless Count Interview Results
- San Diego Union Tribune* Op-Ed: Housing is Good Medicine
- San Diego Business Journal* Op-Ed: The Business of Homeless Services Has Changed
- General background material on PATH, Family Health Centers of San Diego, Affirmed Housing
- News articles regarding PATH projects and permanent supportive housing
- Letters of support for PATH from Southern California business leaders
- ABC World News Tonight video clip profiling PATHMall

Outreach Summary

Community Comments and Questions

What was the selection process?

This process started with the initial open meetings of the City Council, Housing Commission, and CCDC to discuss the issue. A Request for Proposals (RFP) was then publicly issued in 2009. It is normal for the selection process following an RFP to be private; however, once the selection committee made its recommendation, the process became public once again. In April 2010, the selection committee's recommendation was discussed at a meeting of the City Council's Land Use and Housing Committee. At that meeting, staff was directed to conduct a 60-90 day public outreach period, which is currently underway. Connections Housing's outreach plan includes numerous meetings and presentations, a mailing to the neighbors of the proposed site, a website where people can contact the development team, and an open house on May 24. The full City Council is expected to make a decision on the proposal sometime this summer and will hear more public input prior to that decision.

How does this model address PTECH recommendations?

The Plan to End Chronic Homelessness Report (PTECH, released in September 2006) recommends addressing the issue of chronic homelessness with outreach and engagement, triage of the neediest and most vulnerable, and offering them permanent supportive housing. Connections Housing is proposing to survey the chronic homeless in the midtown area, engage with them, and offer them housing and services at the World Trade Center (WTC) site. PTECH also recommends regional Access and Intervention Centers throughout the County which offer the homeless services and resources. Connections Housing is proposing a site in downtown San Diego where chronic homelessness is evident and additional services and housing are needed. PTECH emphasizes expanding the current system already in place. The Community Connections proposal is not a standalone large scale solution, but an addition to some of the current homeless resources and systems currently operating in the downtown area.

What will happen to the existing homeless facilities such as the Winter & Veterans Shelters and the Neil Good Day Center?

Connections Housing will not eliminate the need for other homeless services throughout the City. Most importantly, we must continue to increase the stock of permanent supportive housing units (apartments linked to services) available, as that is the best and most permanent solution for chronic homelessness. In addition, there will always be a need for services for people who are episodically homeless due to a job loss, illness, or other unanticipated setback, and some traditional shelter space will still be needed. We recommend that the temporary Veterans Winter Tent remain in operation while resources are sought for a permanent, year-round solution to replace its 150 beds. We also recommend that Neil Good Day Center remain open for now, phasing out as more people are placed in permanent housing and the need for a

place to go during the day diminishes. Connections Housing will replace the downtown Winter Shelter Tent.

Why is the number of beds proposed lower than the number of shelter beds at the Winter Shelter program?

The number of beds proposed is doable in terms of minimal neighborhood impact and operating costs. The center will provide 150 beds and 73 units year-round, which is a significant improvement over the 220 beds historically provided for 16 weeks a year in the winter shelter tent. The Connections Housing proposal offers a long term solution to vulnerable people rather than temporary relief from the cold.

Will this facility result in a lifting of the settlement agreement that prohibits illegal lodging citations for people sleeping on the street at night?

The sponsors of this project have no direct connection with the litigation. However, similar litigation in Los Angeles was settled relying exclusively on permanent supportive housing units (studio apartments linked to social services) and not on shelter beds. In San Diego, over 500 permanent supportive units, including 73 in the WTC project, are expected to become available in the next few years. While the lawsuit's outcome is not known at this time, it is clear that the only viable way to get the settlement agreement lifted is to generate housing alternatives for homeless people. This project is part of that solution.

What will happen to the historical façade of the building? Will this use require a re-zone?

The historic façade will be repaired and upgraded as part of the renovation plan. The current zoning allows the proposed use with a Conditional Use Permit (CUP). Originally designed and permitted as the San Diego Athletic Club, the property was home to a restaurant, health and recreation amenities, and hotel/residential units. While the property is within the Employment Overlay Zone, CCDC has a historic ordinance that exempts historic buildings from the effects of the overlay. As a condition of the CUP, there will be a Good Neighbor Covenant which will be legally enforceable.

What will be the hours of operation of the proposed center and how will that impact neighborhood businesses?

Residents of the interim and permanent housing may be on site at any time. The one stop service center and the medical clinic will be open a minimum of 40 hours a week, during regular business hours, but specific hours of operation will not be set until there is a finalized financial agreement. Extended evening and weekend hours will also be considered, based upon funding and client needs. The facility will improve the neighborhood for businesses by bringing many of the 250-300 homeless people who live on the streets in the immediate vicinity off the streets and inside Connections Housing for housing and services.

Will children and others in the neighborhood be safe?

PATH is an experienced operator with a tested safety protocol. In Los Angeles, PATH Mall is located within .4 miles of ten schools and the Gramercy Housing Group (a PATH project) has its own childcare center with approximately forty children. In addition, PATH's Hollywood Interim Housing facility (65 beds) has operated across the street from a daycare center for about six years without incident

Activities in the building will include a full service medical clinic that is open to families and singles; all of the twenty-nine sites currently operated in San Diego County by Family Health Centers have strong safety records. The new facility will increase neighborhood safety by: maintaining 24 hour/7 day a week security in the residence sections of the building and a standard security protocol in the medical clinic and service center during hours of operation; 24 hour phone line for general concerns; a Loitering Prohibition Plan; a Neighborhood Covenant and Advisory Board, which will conduct regularly scheduled meetings to discuss problems and solutions; an Outreach Team that will identify and evaluate homeless persons sleeping in the area to offer them appropriate housing and supportive services; and security features such as fences and privacy windows (frosted). Residents who live on site will not be required to leave the premises during the day.

Is this facility displacing current tenants or taking up office space we will need for the future?

The World Trade Center is owned by the City of San Diego which tried to sell it for several years. The current tenants are on month-to-month leases and are aware of the possibility of a sale of the building. In addition, there is an abundance of vacant retail/office space in the downtown area.

Does this facility serve all of Downtown?

Connections Housing Downtown will focus on the estimated three hundred homeless people who live in the immediate vicinity plus homeless people from other parts of downtown who have been identified as being the most vulnerable for dying on the streets. As a major step forward from the winter tent program, Connections Housing will offer engagement, assessment, supportive services and long-term housing onsite as well as placement at other appropriate locations for a permanent solution to living -- and dying - on the street. In other parts of the country, this approach has led to a reduction in chronic homelessness and significant cost reductions for public services without pushing homeless people from one neighborhood to another.

Explain how or if CCDC/SDHC can invest in HHS private programs regionally?

CCDC affordable housing guidelines require 15% of the units in any Agency-funded affordable housing development to be supportive units. Twenty percent of CCDC's annual gross tax increment is set aside for affordable housing construction and preservation. CCDC also has approximately \$4 million budgeted in its Health and Human Services Program for capital improvements to expand or improve downtown service providers' facilities. Agency funds cannot be used for operations or maintenance. CCDC funded projects must benefit the downtown area.

The Housing Commission can only expend funds within the City of San Diego; however investment in both private and not-for-profit entities is permitted.

What are the cost/benefits of the proposed project?

There are currently too many variables outstanding to allow for a precise economic analysis, but following are some cost data which demonstrate that permanent supportive housing with on-site services will not only improve quality of life for the people affected, but will also save significant tax dollars in the long run.

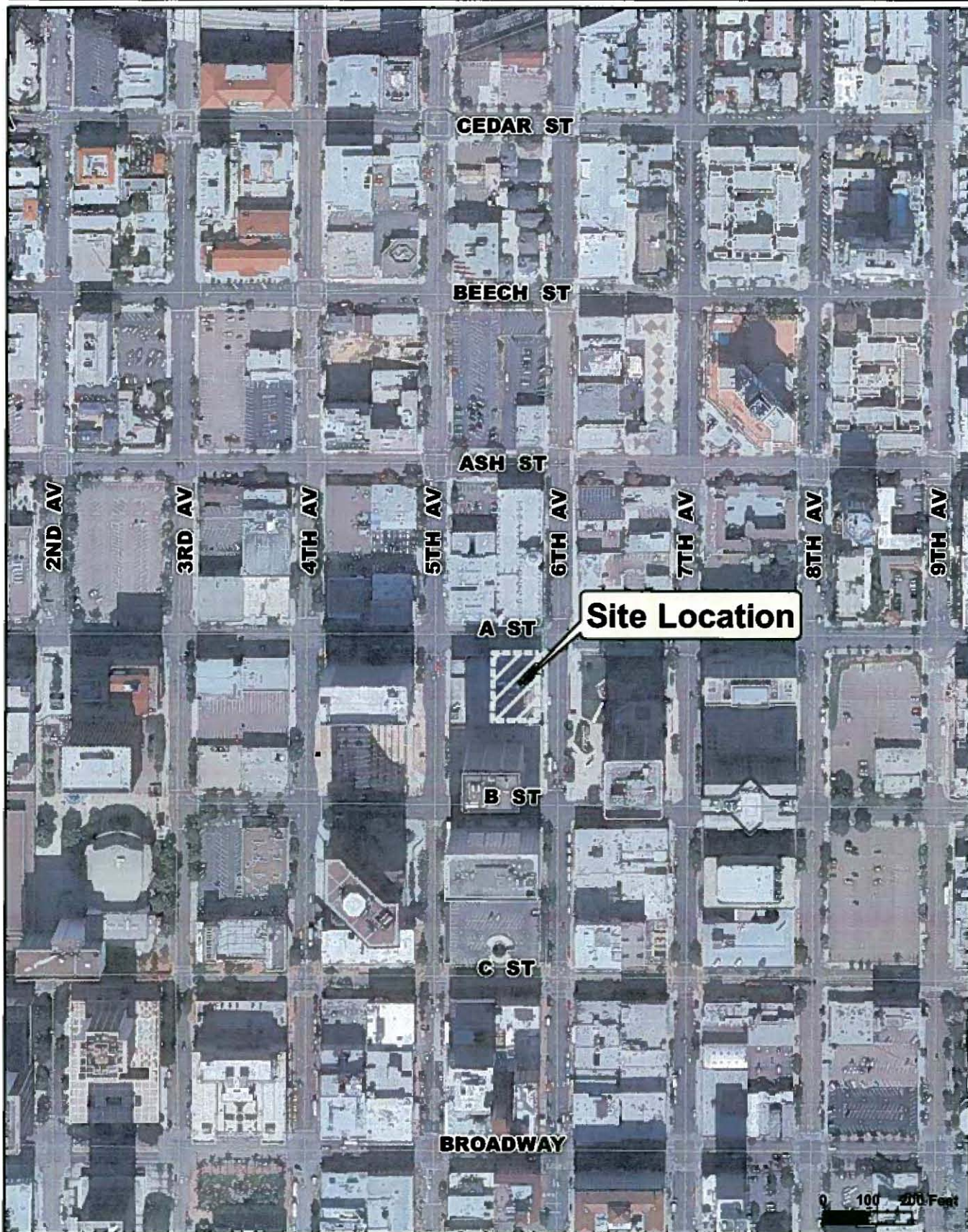
The City of San Diego currently budgets about \$2 million per year on direct services for homeless people. About half a million of that is for the temporary winter emergency shelter. This only represents the tip of the iceberg of what is spent on addressing homelessness downtown and does not include the cost of emergency medical treatment or law enforcement.

Many homeless people are caught in a revolving door of street to emergency room to hospital to jail and back to the street. Often, expensive ambulances or squad cars are the means of transportation for homeless people in crisis. Homeless people suffer serious illness and injury three to six times as often as those who have homes and are less likely to have a regular primary care physician. As a result, even routine health conditions end up becoming more serious and costly, especially since the emergency room is often the place where their health problems are treated. A San Diego study of 15 homeless people showed that they were responsible for \$1.5 million in treatment costs at two regional medical centers in one year – nearly \$100,000 per person.

A unit of permanent supportive housing costs approximately \$10,000 per year to operate. The cost of supportive services associated with that unit can vary widely, but \$5,000 - \$10,000 per year is a fair and conservative estimate. Even taking into account the initial investment to build or develop these housing units, the savings to taxpayers in the long run is significant.

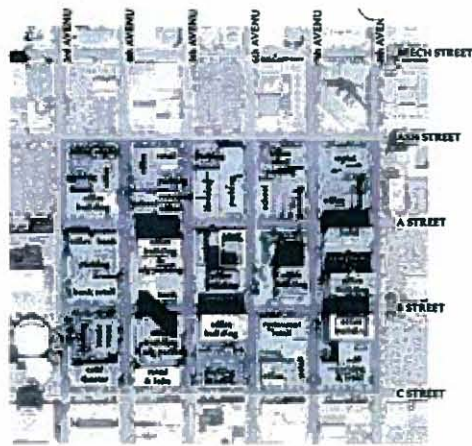
Many other cities have experienced dramatic savings using the same approach proposed for Connections Housing. For example, supportive housing in Portland resulted in health care savings of 59 %, mental health care savings of 41%, emergency room care savings of 62% and ambulance and police service savings of 66%. Even if the City were not to save one dollar, ending a person's homelessness improves the quality of individual lives, as well as the quality of the surrounding neighborhood, in ways that are beyond pricing.

ATTACHMENT 2
PROJECT LOCATION MAP



 **SITE LOCATION**

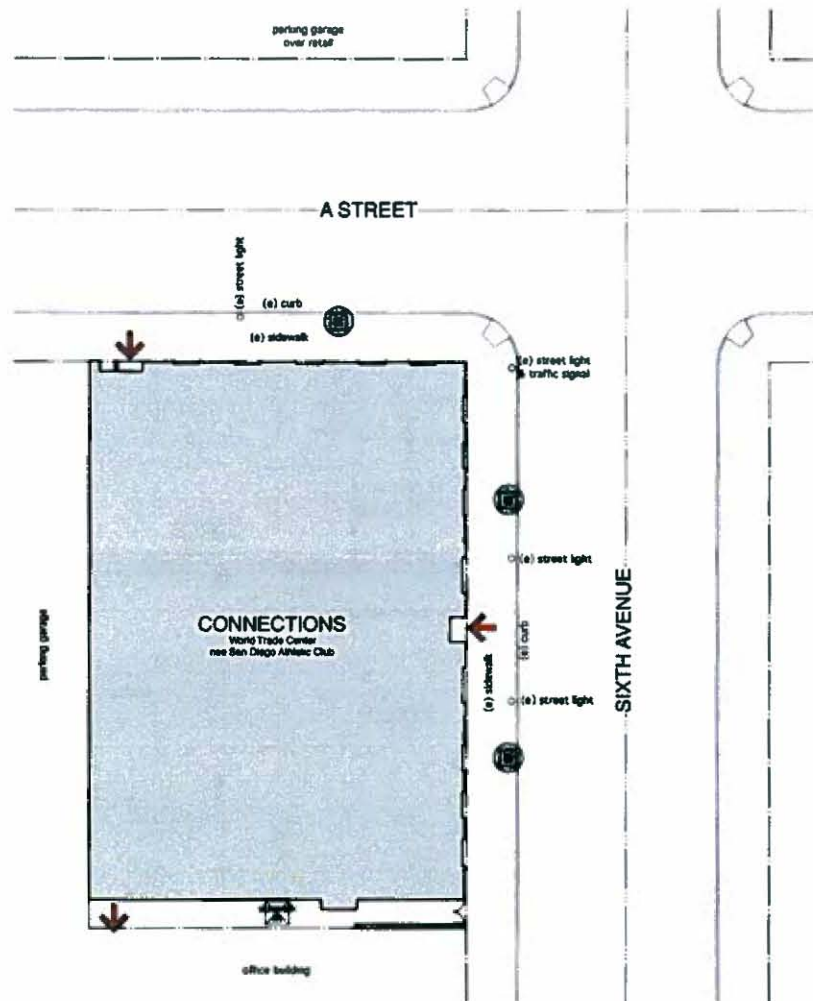
 Centre City
Development
Corporation



VICINITY PLAN



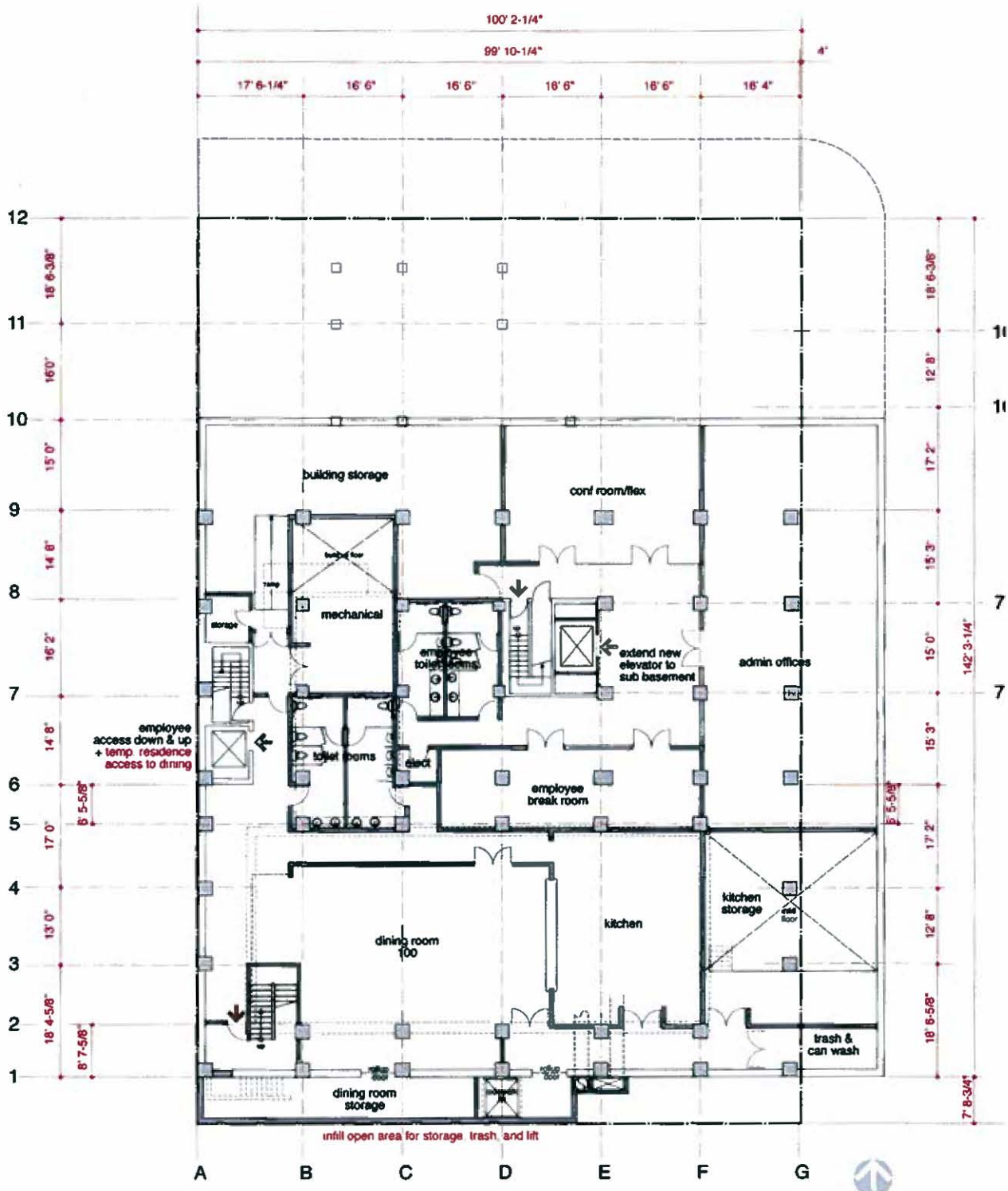
VICINITY PLAN



SITE PLAN
1/16" = 1 0"



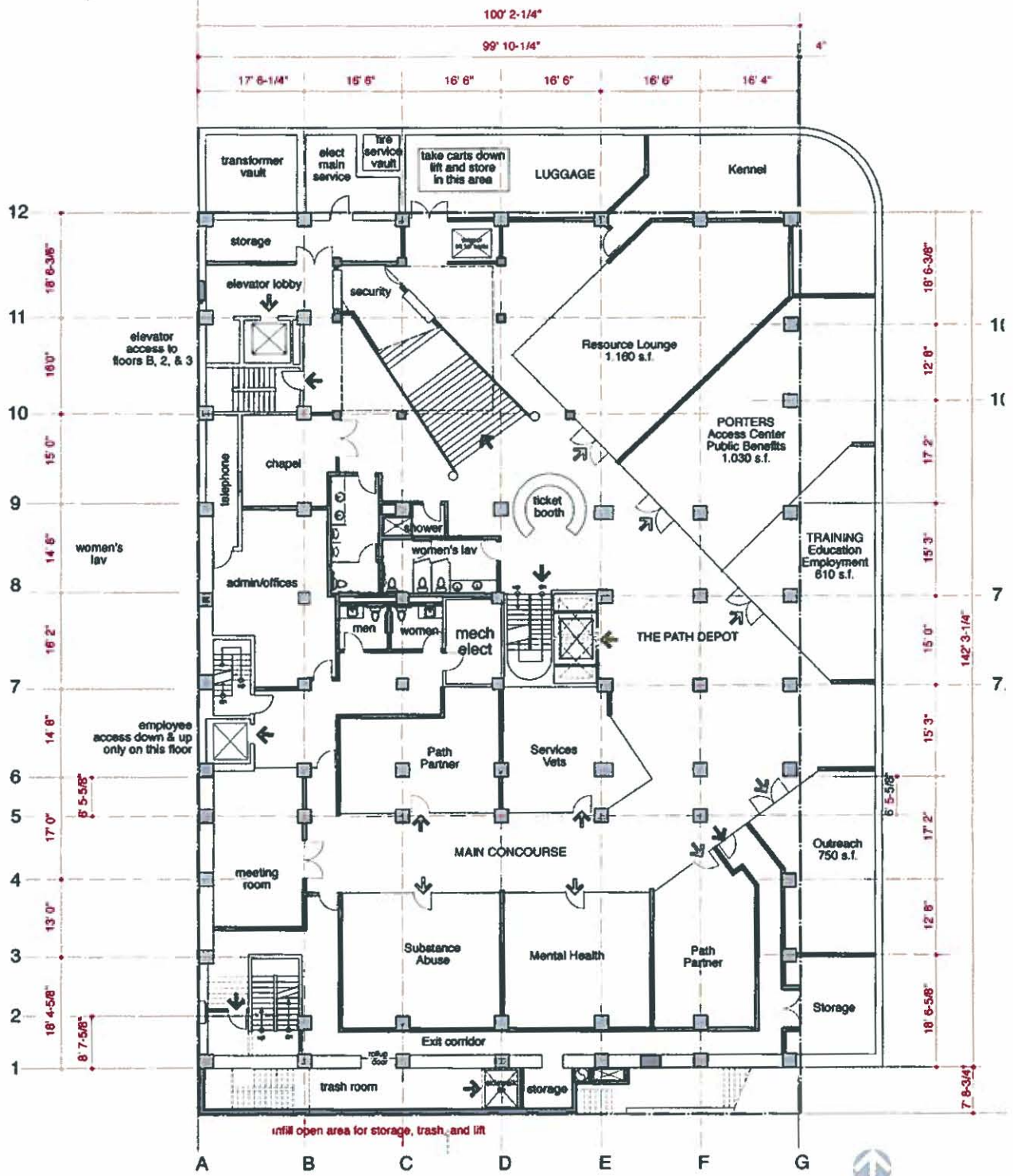
october 21, 2010
 1250 Sixth Avenue
CONNECTIONS
 ARCHITECTS Richard Bundy & David Thompson



SUB BASEMENT PLAN
1/8" = 1' 0"



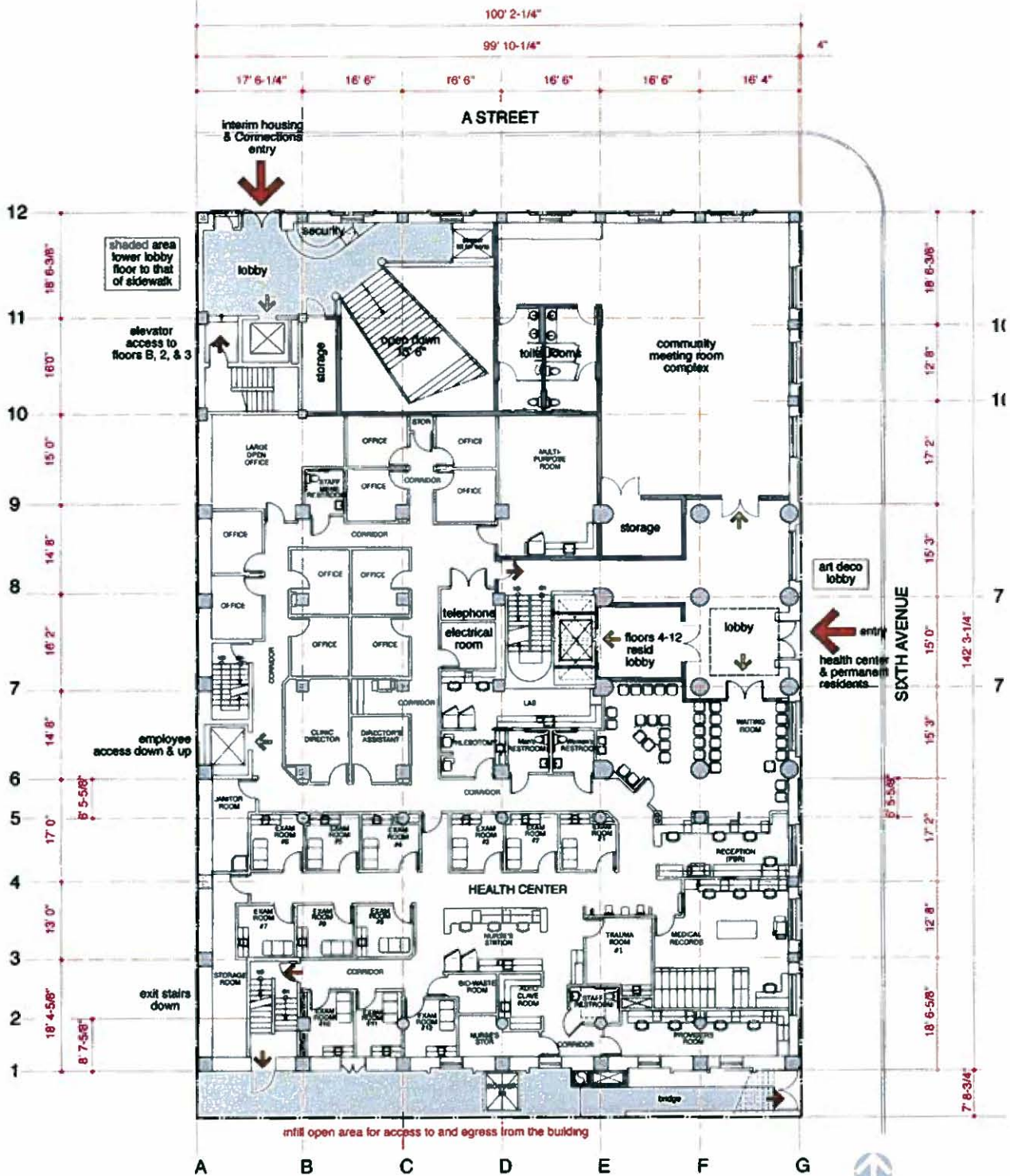
october 21, 2010
 1250 Sixth Avenue
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BASEMENT PLAN
1/8" = 1' 0"



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1250 Sixth Avenue
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FIRST FLOOR PLAN

1/8" = 1 0"



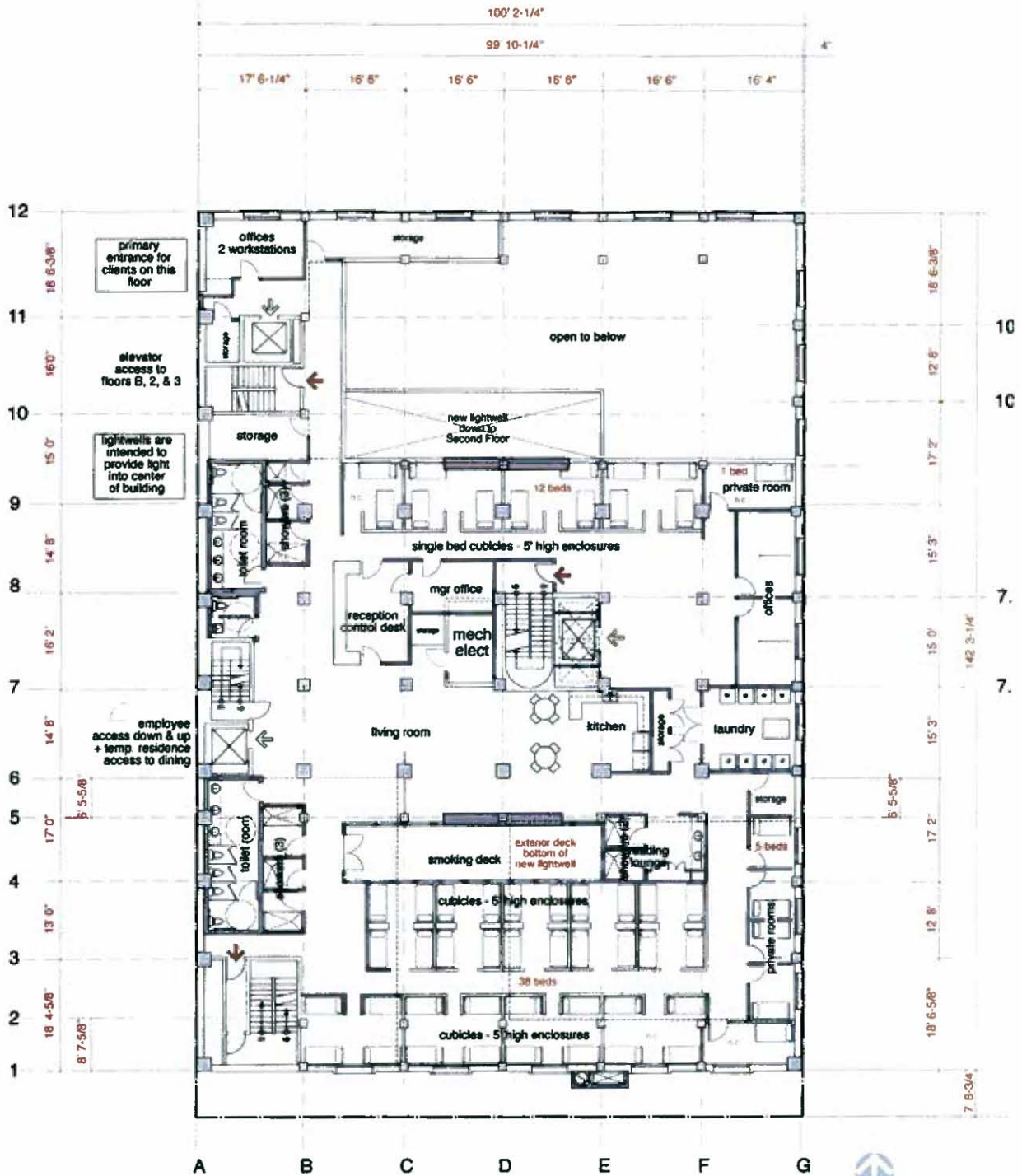
FAMILY HEALTH CENTERS
OF PA. INC.



october 21, 2010

**1250 Sixth Avenue
CONNECTIONS**

ARCHITECTS Richard Bundy & David Thompson

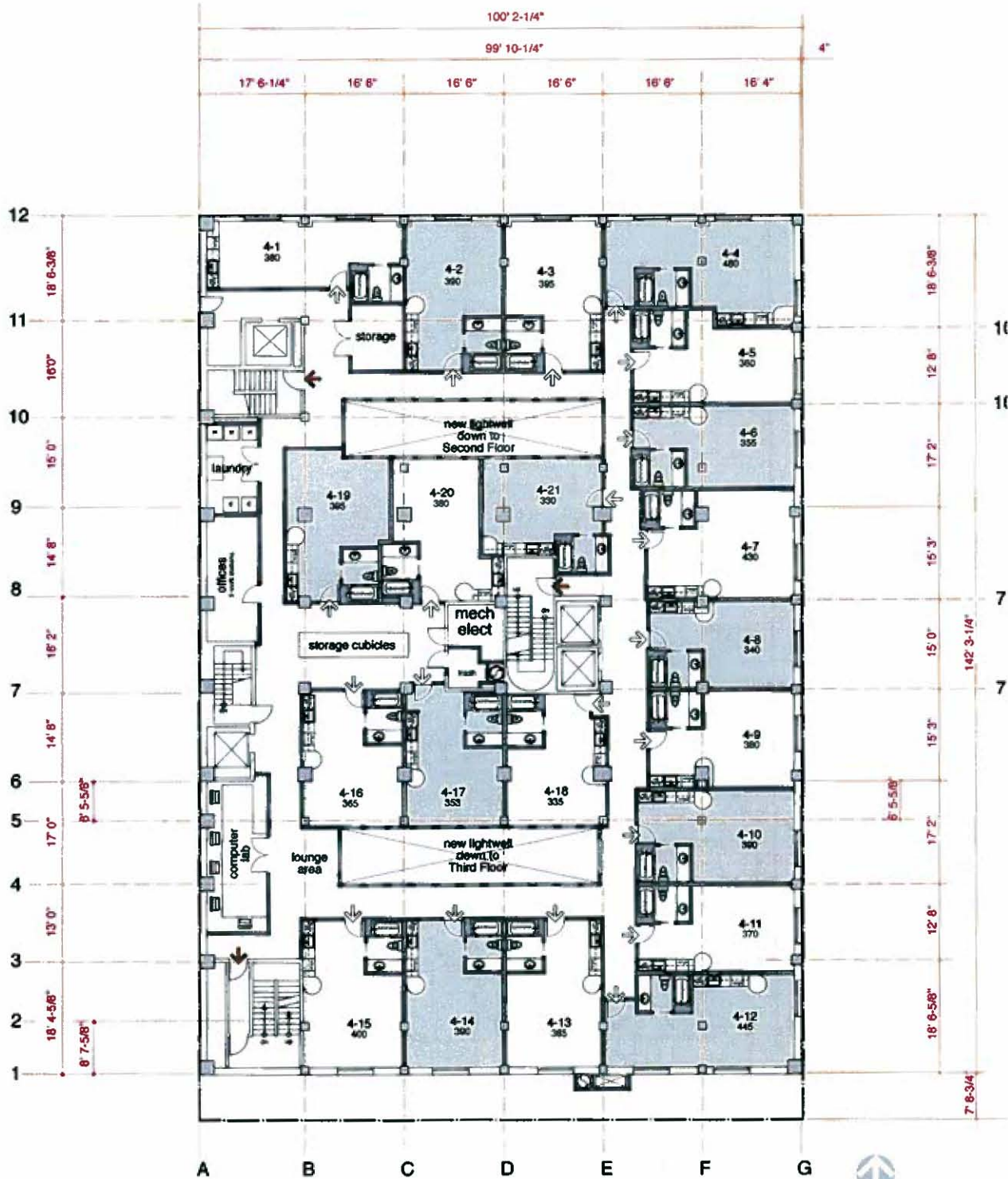


3rd FLOOR
1/8" = 1 0"



WOMEN 56
50 beds
+6 private beds

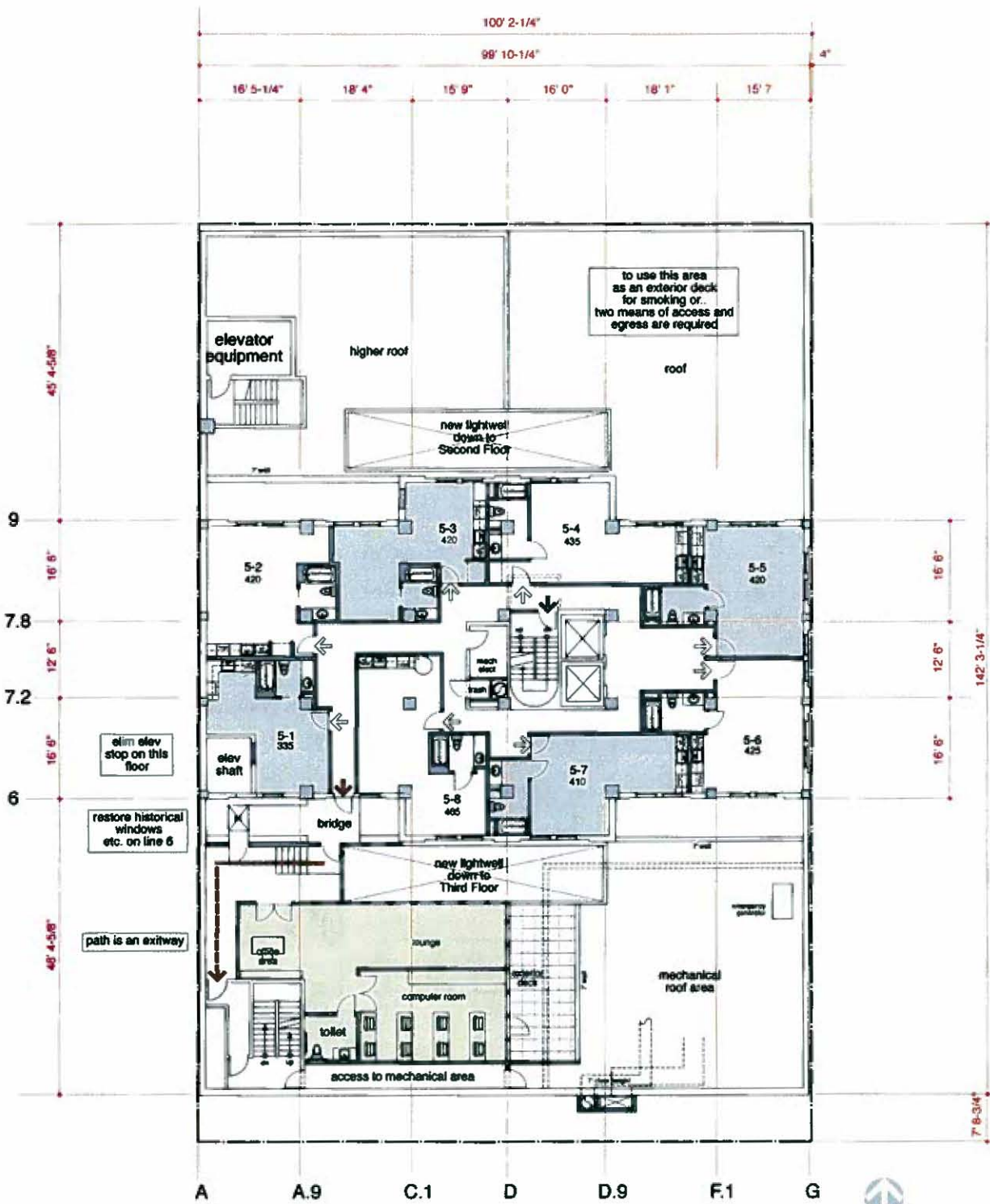
January 6, 2011
1250 Sixth Avenue
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4th FLOOR
1/8" = 1' 0"



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5th FLOOR
1/8" = 1'0"



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6th FLOOR
1/8" = 1 0"



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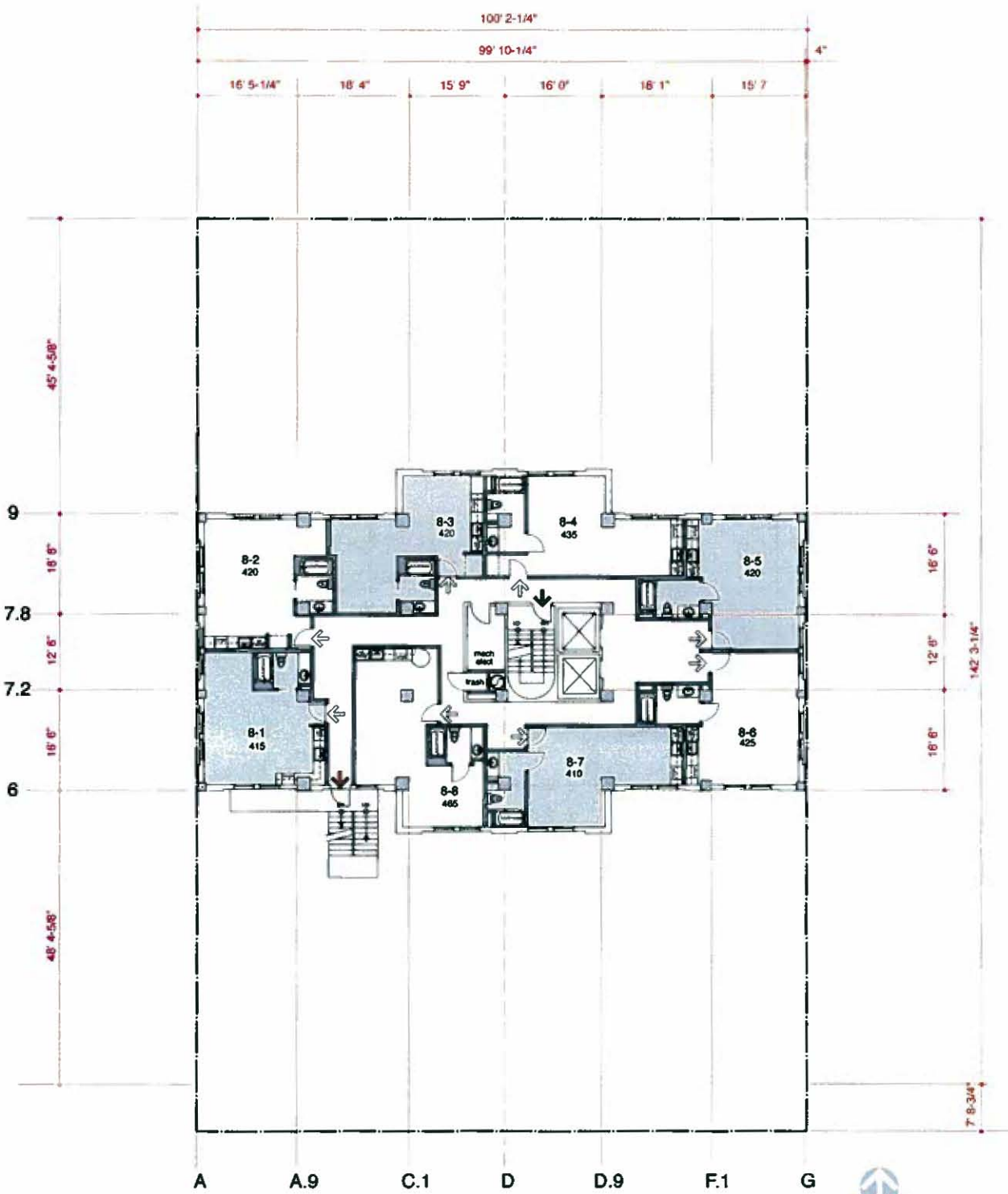
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7th FLOOR
1/8" = 1 0"



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8th FLOOR
1/8" = 1 0"



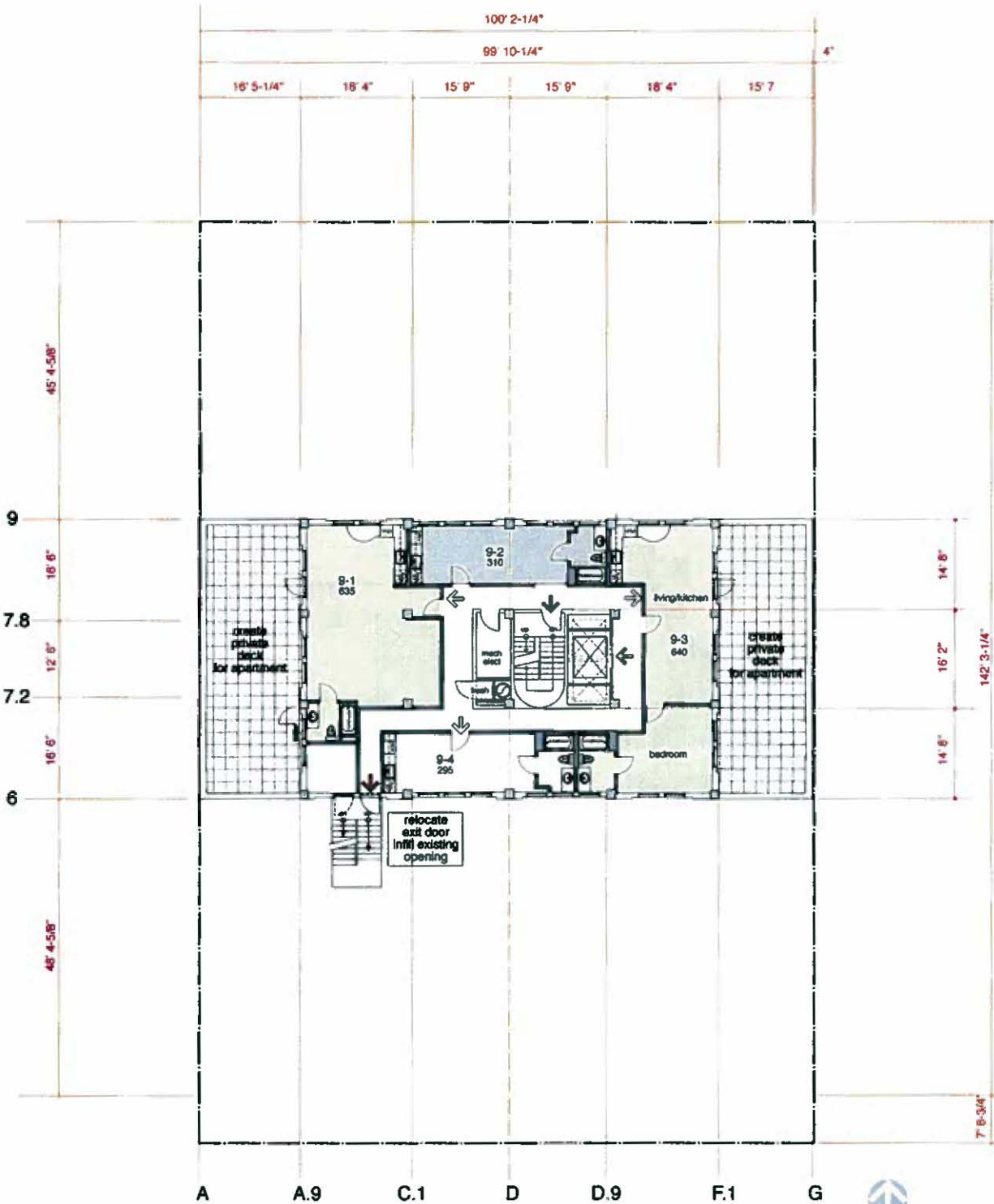
FAMILY HEALTH CENTERS
BY DAN THOMPSON



october 21, 2010

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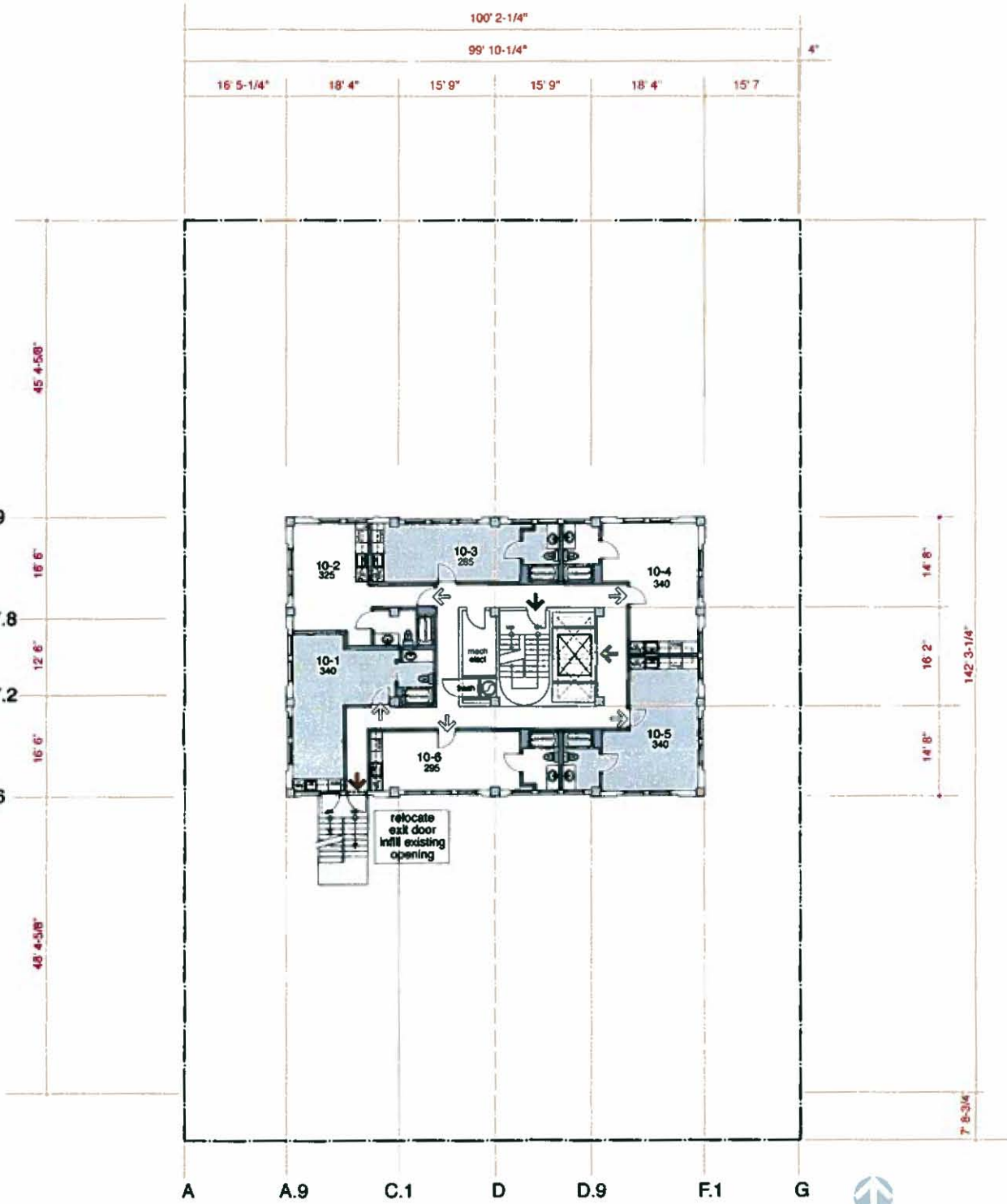
9th FLOOR
1/8" = 1.0"



october 21, 2010

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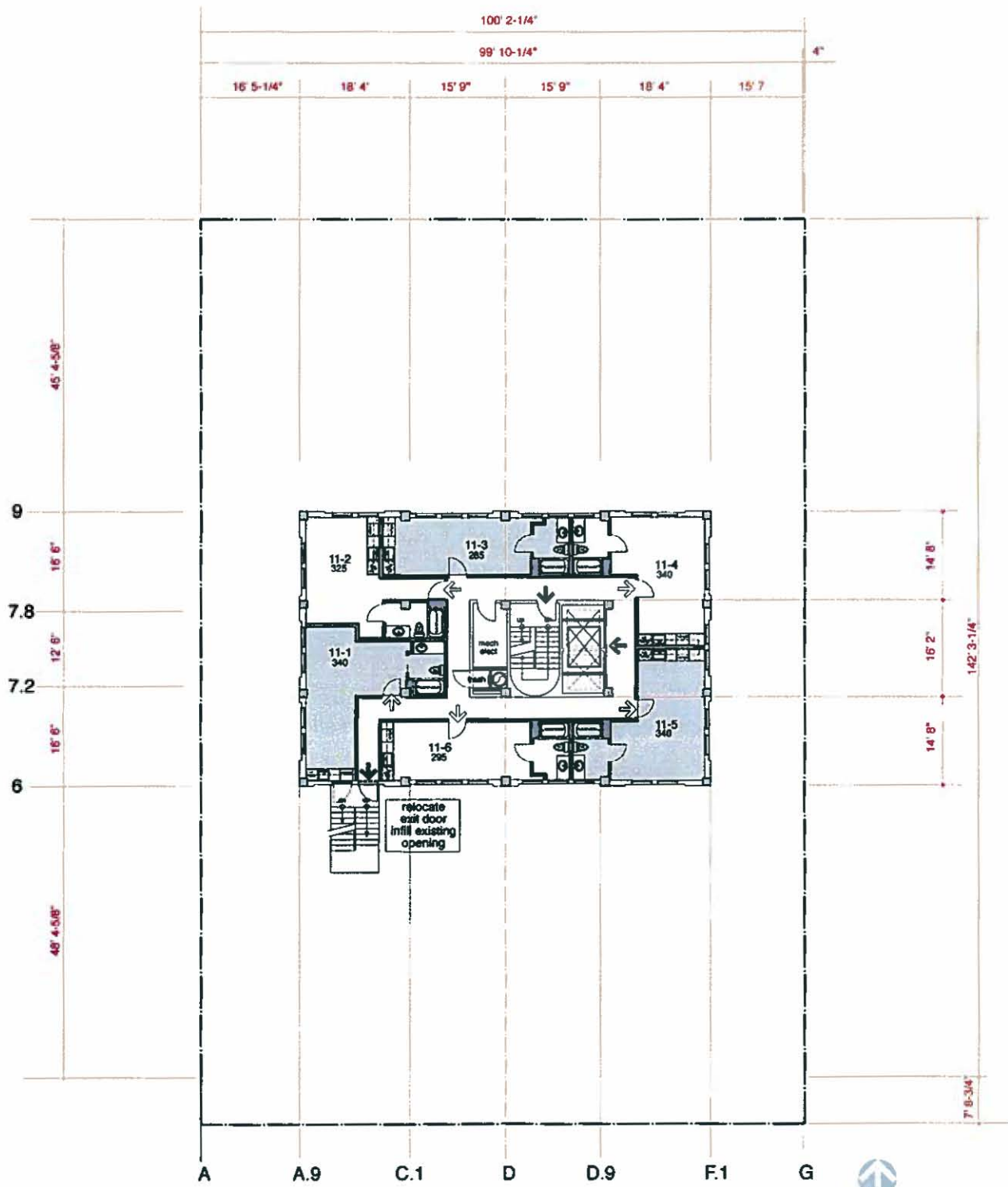
10th FLOOR
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october 21, 2010

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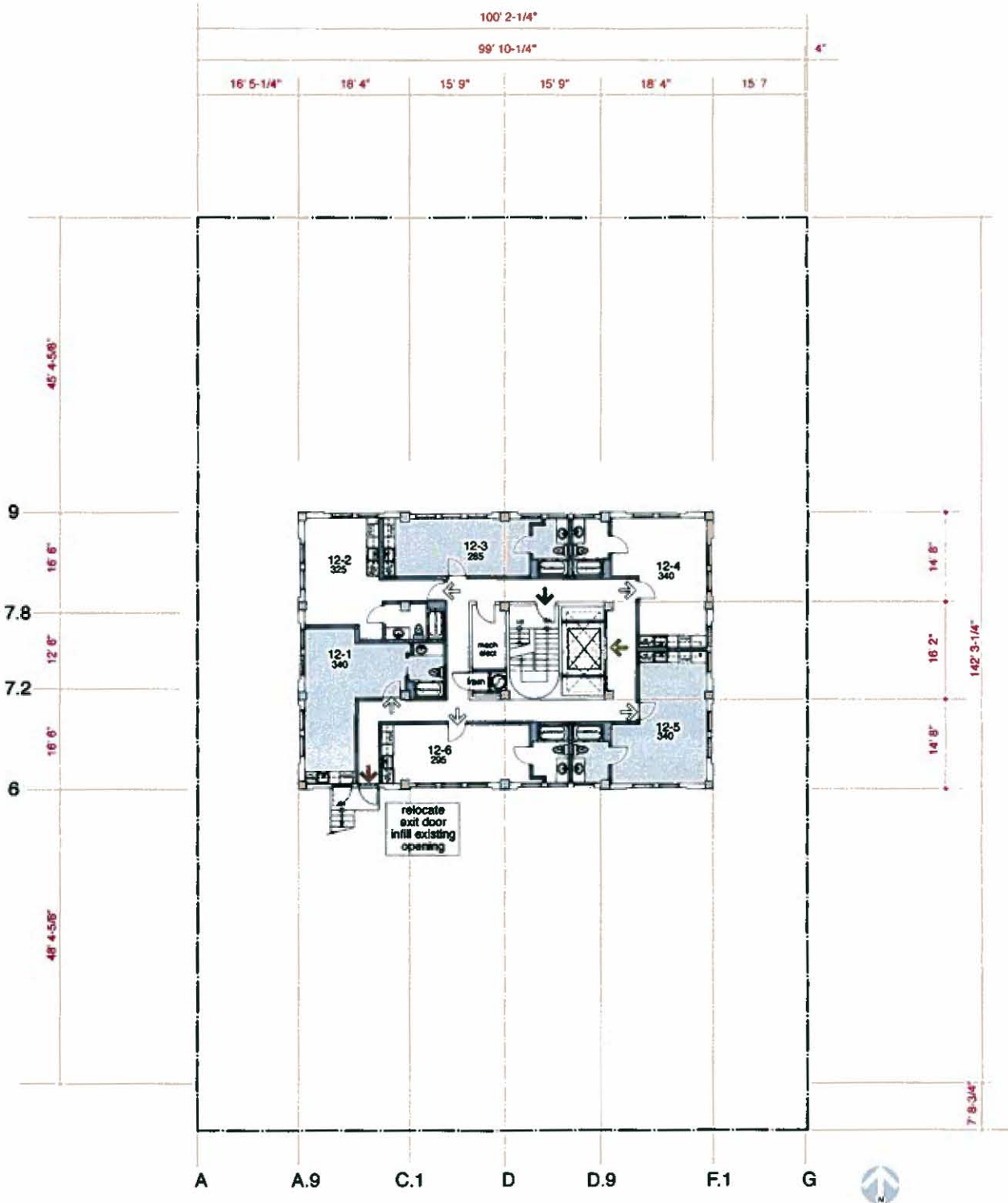
11th FLOOR
1/8" = 1'0"



october 21, 2010

1250 Sixth Avenue
CONNECTIONS

ARCHITECTS Richard Bundy & David Thompson



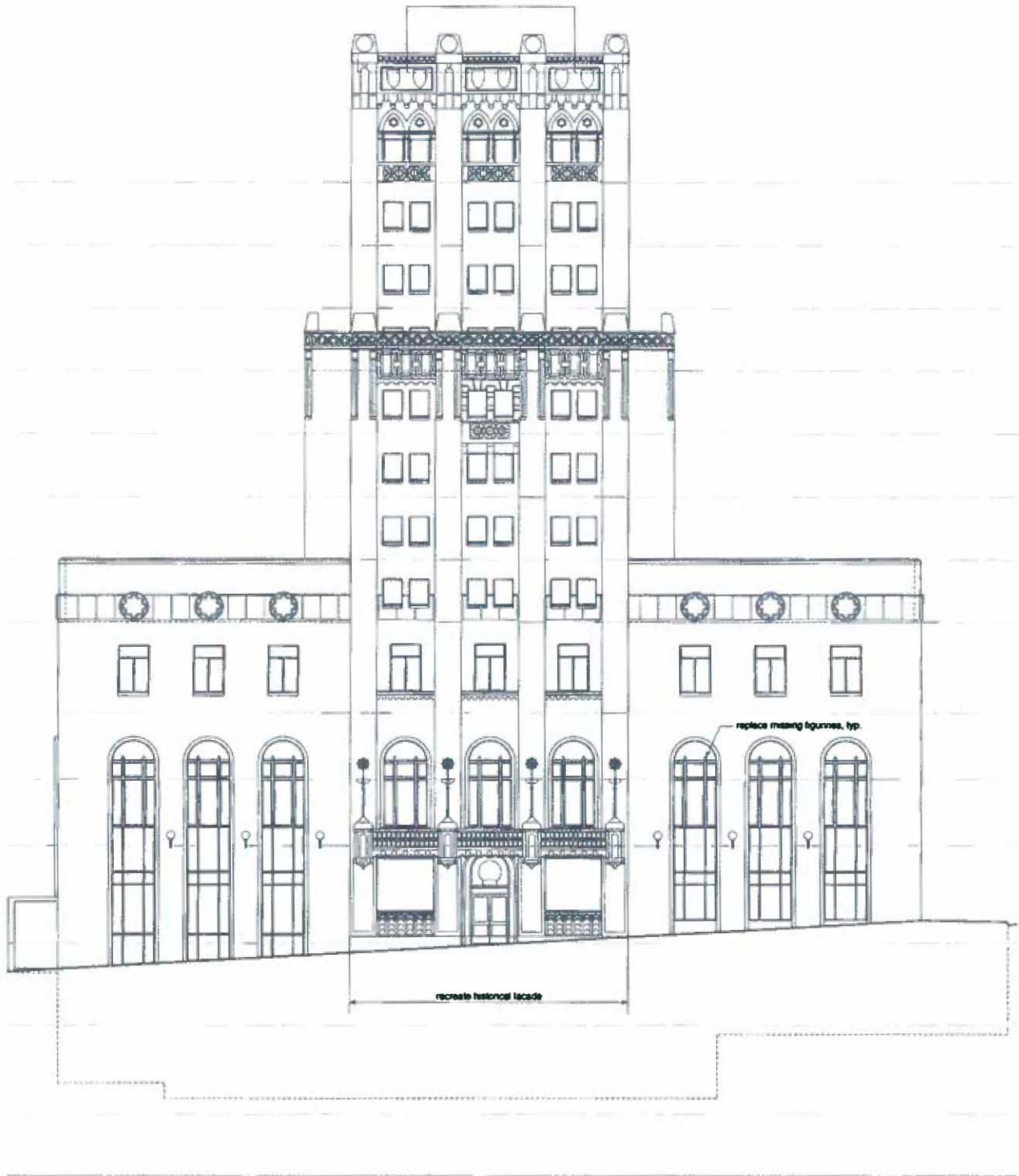
12th FLOOR
1/8" = 1' 0"



october 21, 2010

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ARCHITECTS Richard Bundy & David Thompson



EAST ELEVATION - 6th Avenue

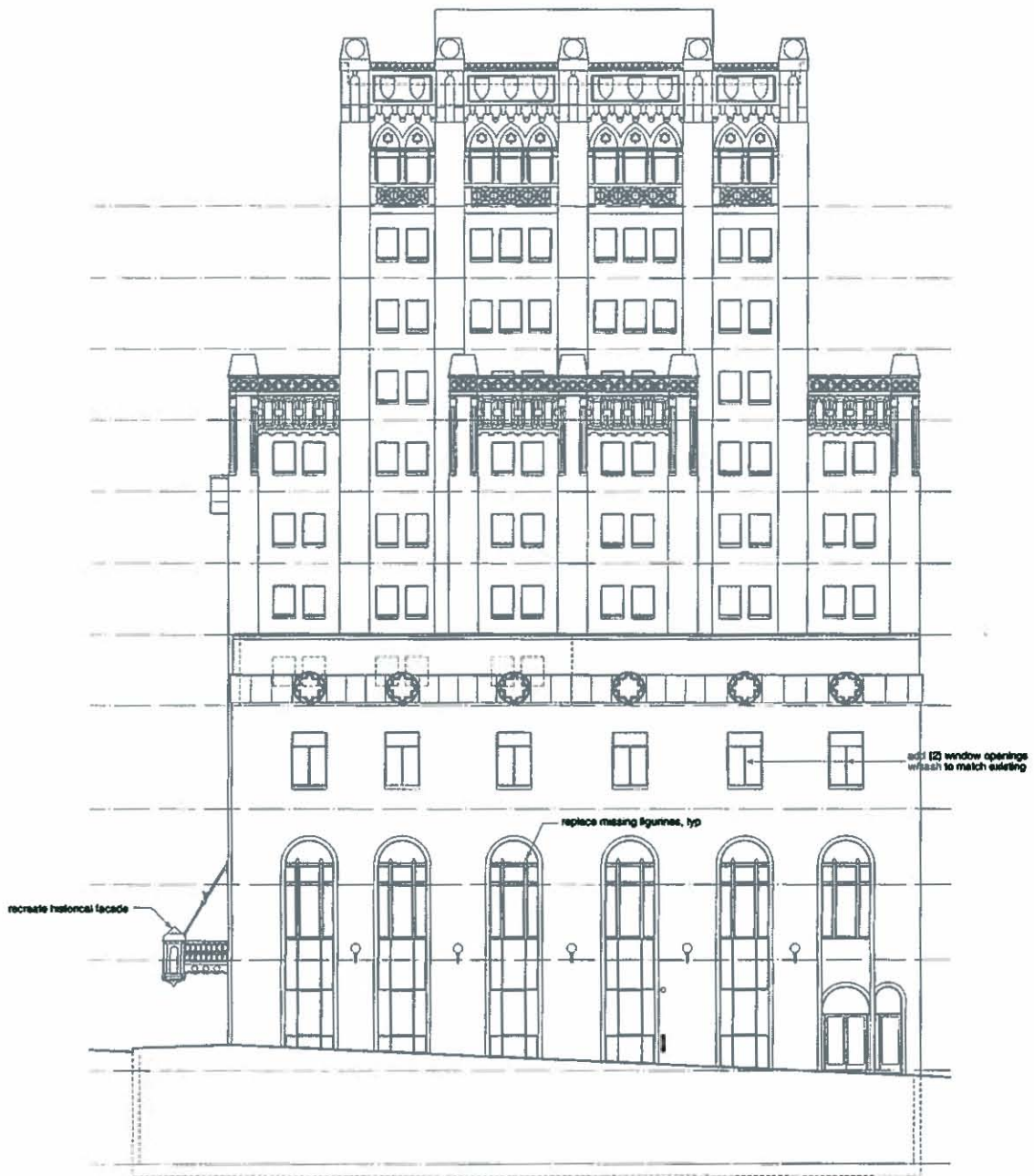


October 21, 2010

1250 Sixth Avenue

CONNECTIONS

ARCHITECTS Richard Bundy & David Thompson



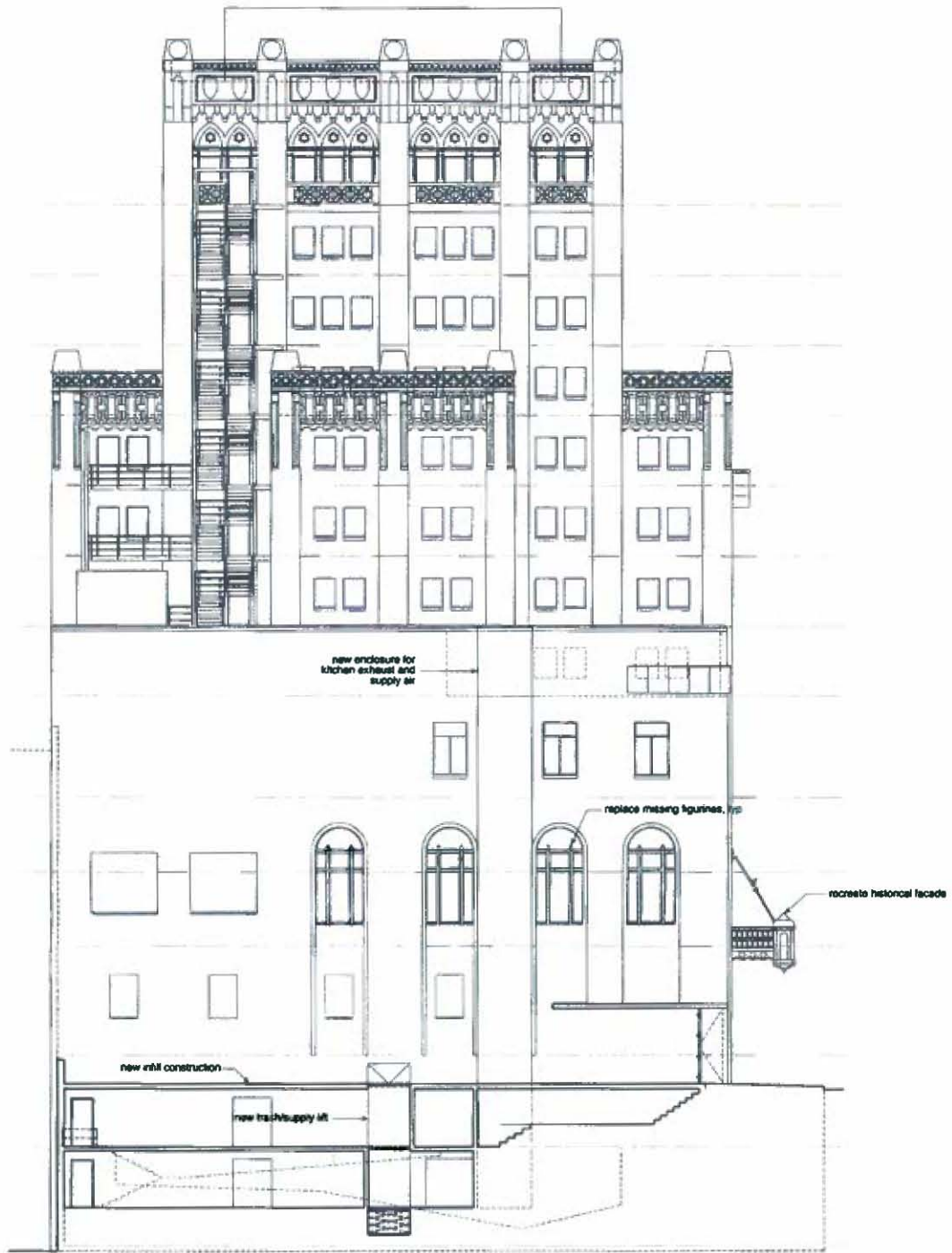
NORTH ELEVATION - A Street



October 21, 2010

1250 Sixth Avenue
CONNECTIONS

ARCHITECTS Richard Bundy & David Thompson



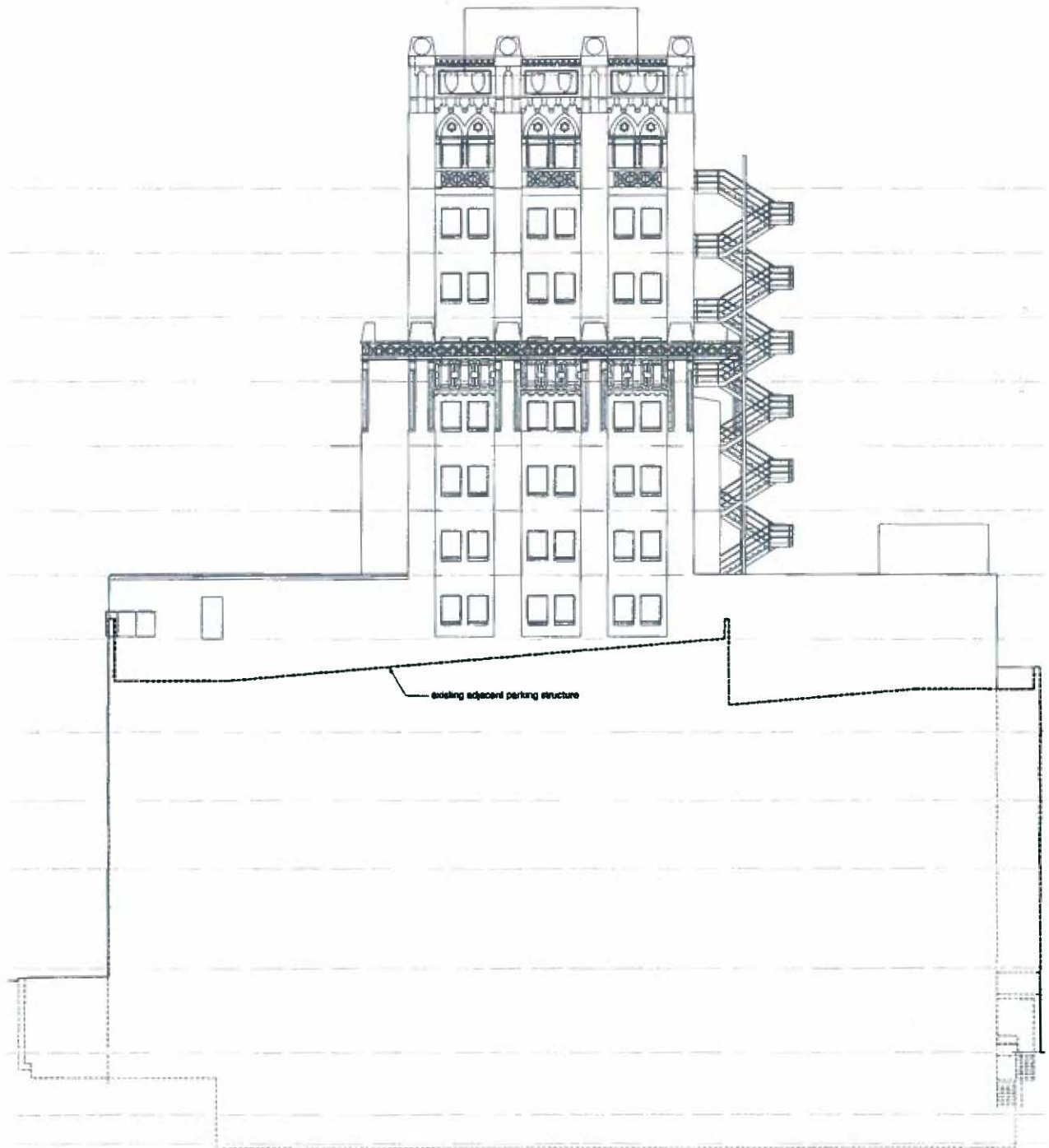
SOUTH ELEVATION



october 21, 2010

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CONNECTIONS

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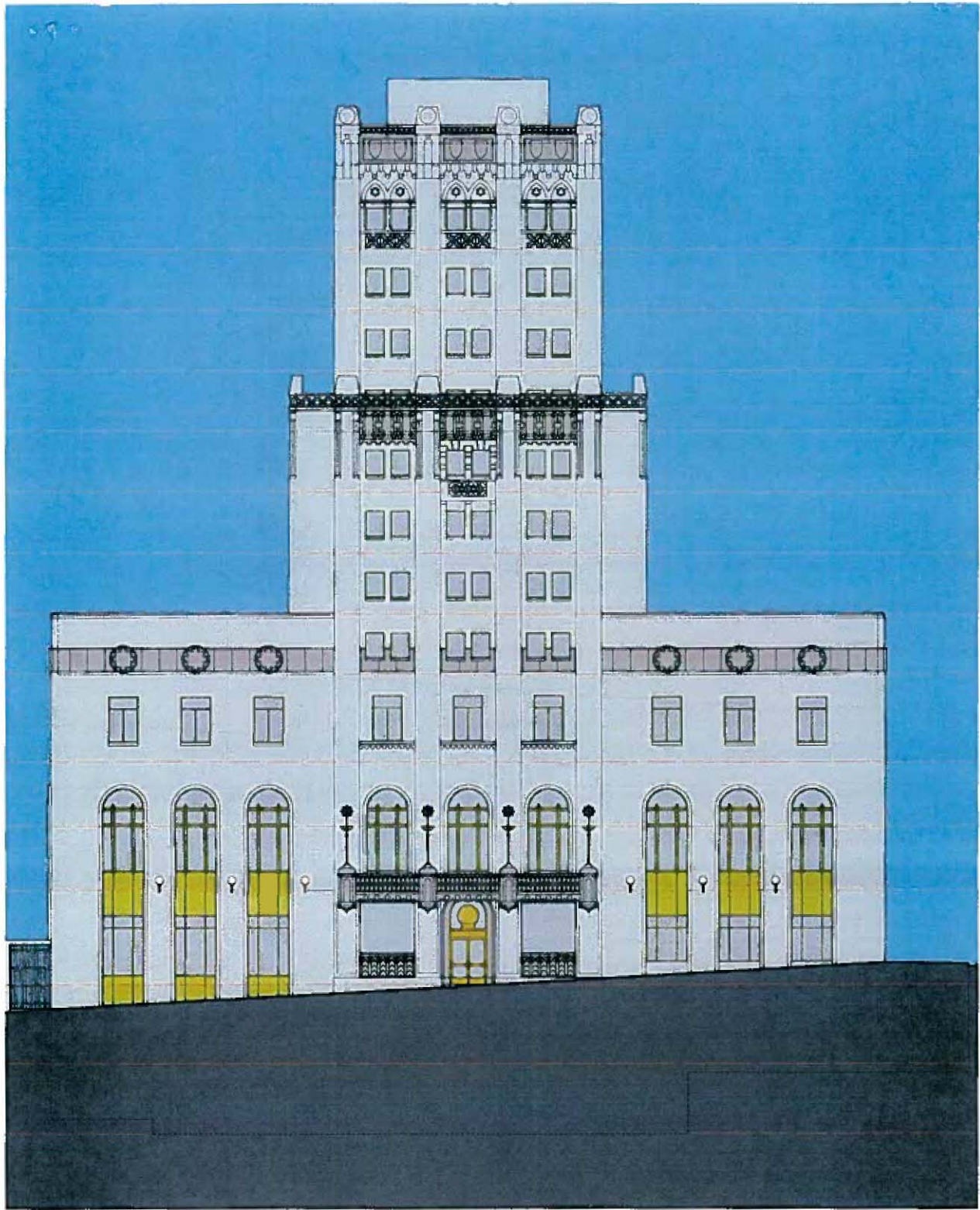
WEST ELEVATION



october 21, 2010

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CONNECTIONS

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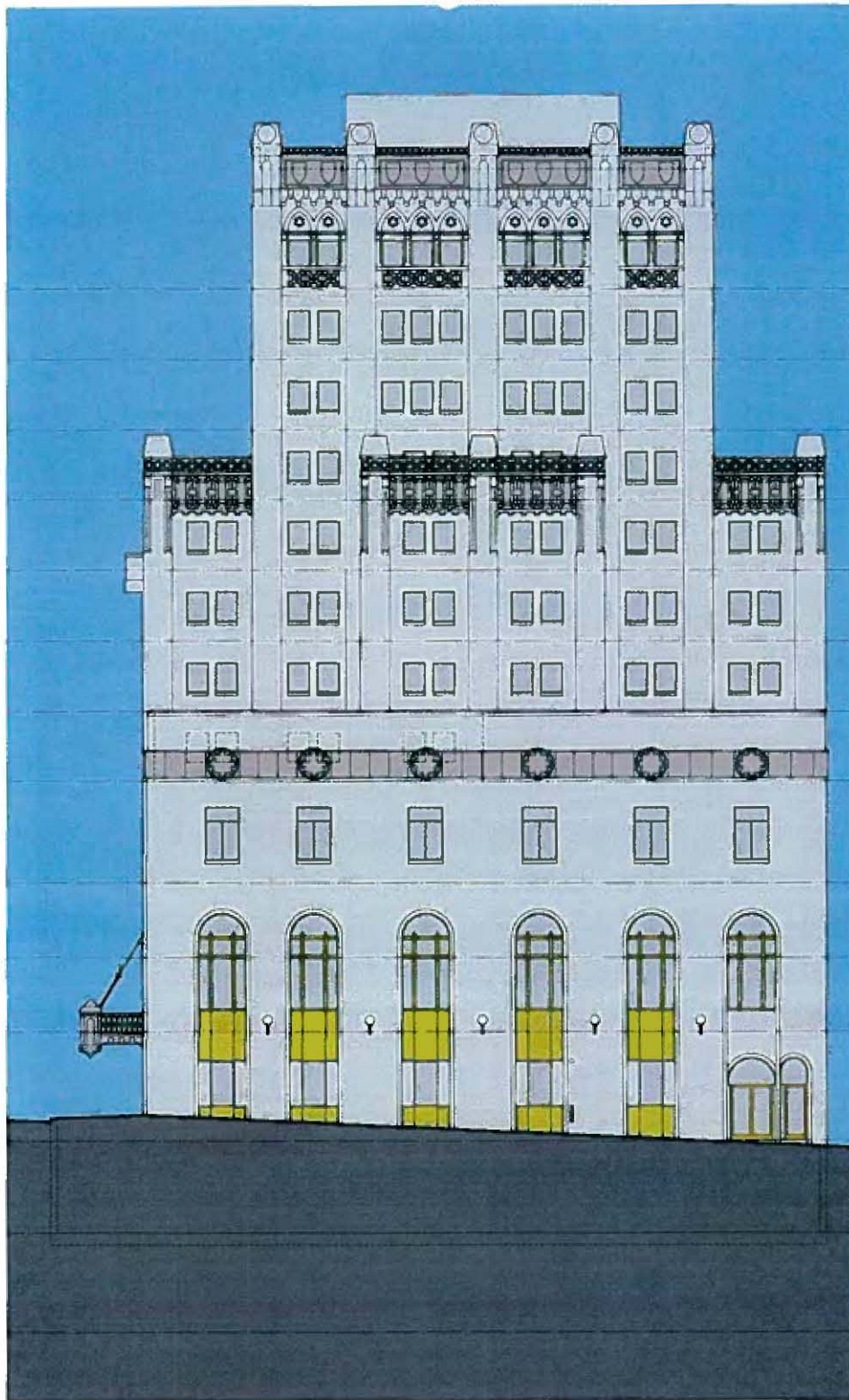
EAST ELEVATION - 6th Avenue



october 21, 2010

1250 Sixth Avenue
CONNECTIONS

ARCHITECTS Richard Bundy & David Thompson



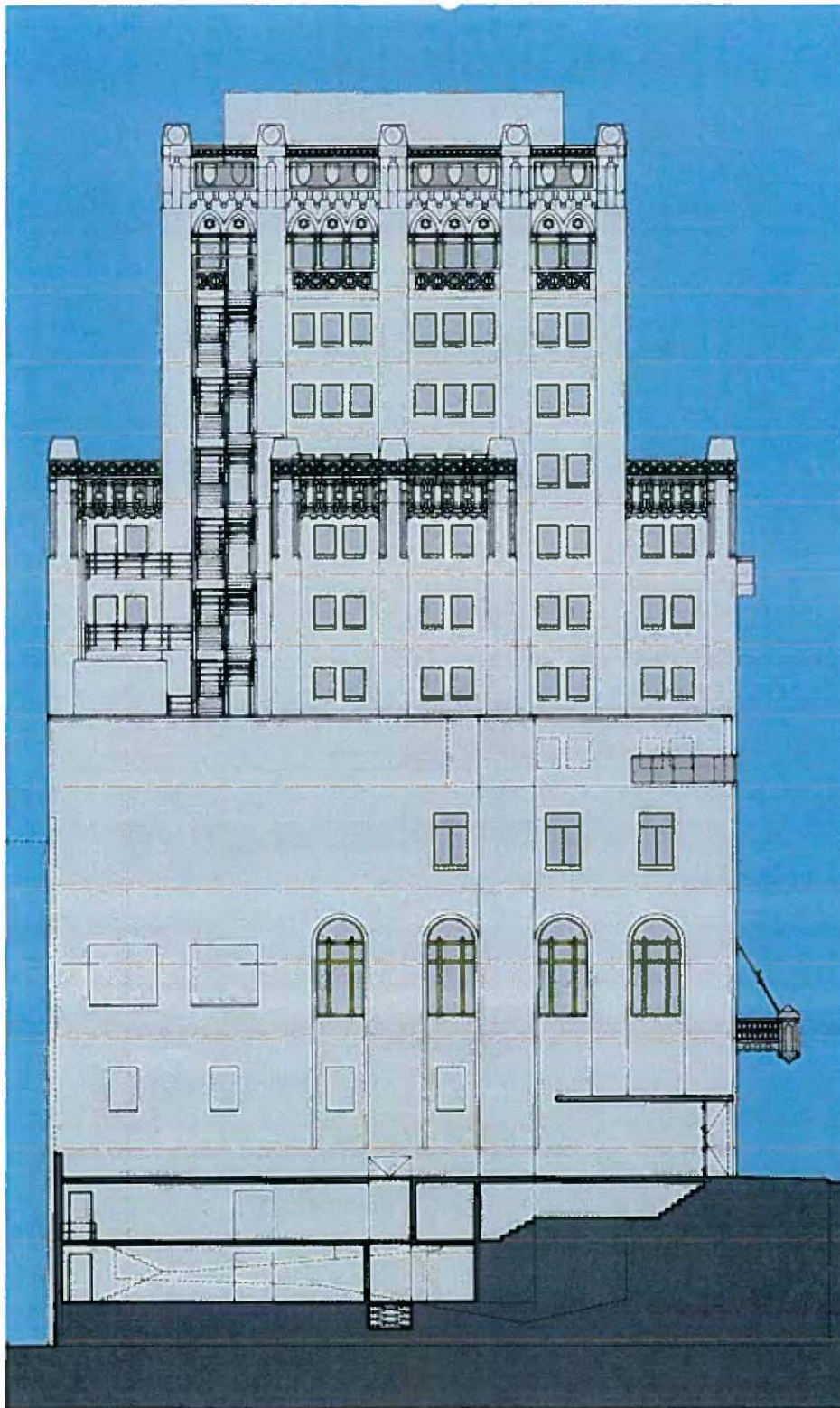
NORTH ELEVATION - A Street



october 21, 2010

1250 Sixth Avenue
CONNECTIONS

ARCHITECTS Richard Bundy & David Thompson



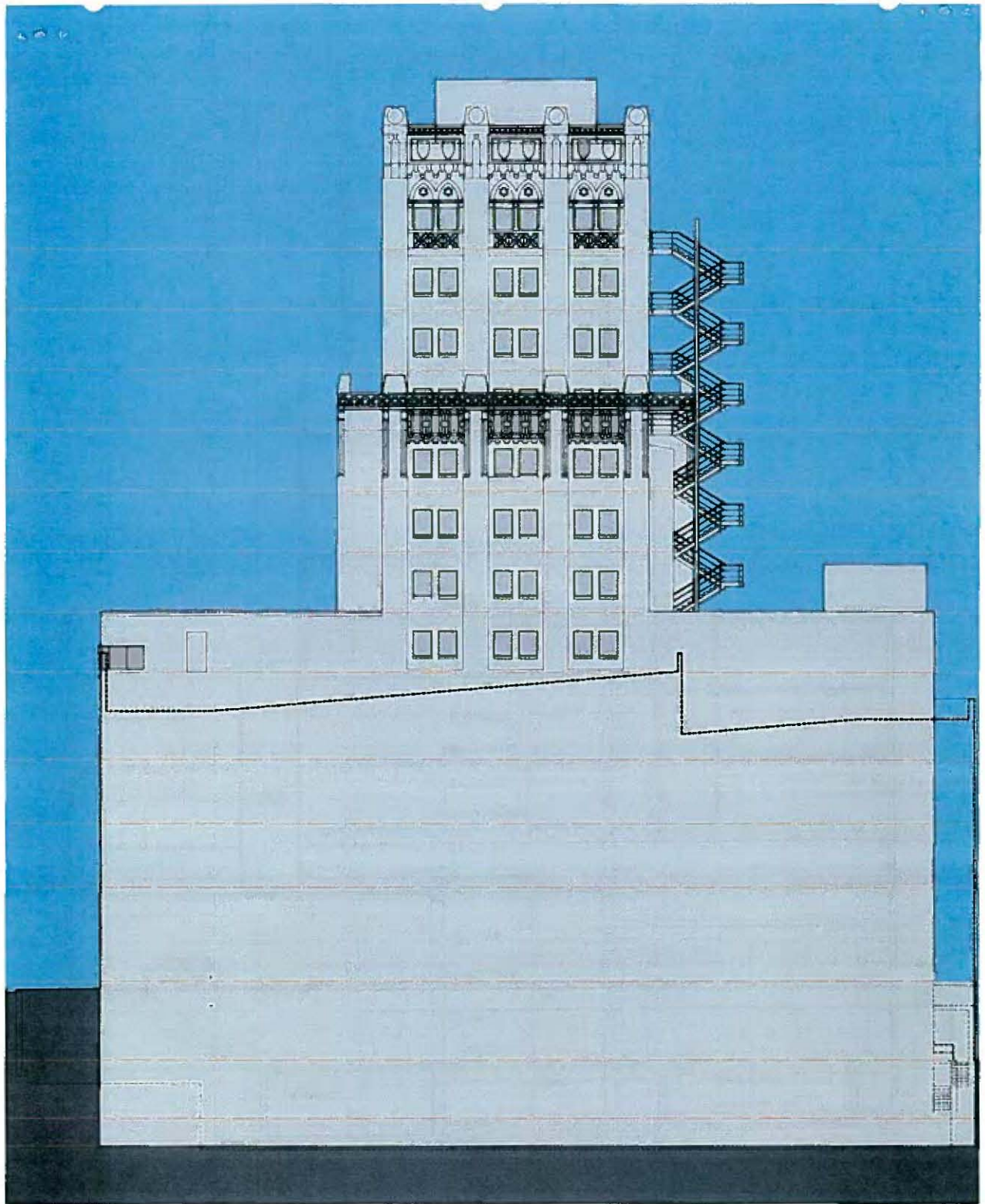
SOUTH ELEVATION



october 21, 2010

1250 Sixth Avenue
CONNECTIONS

ARCHITECTS Richard Bundy & David Thompson



WEST ELEVATION



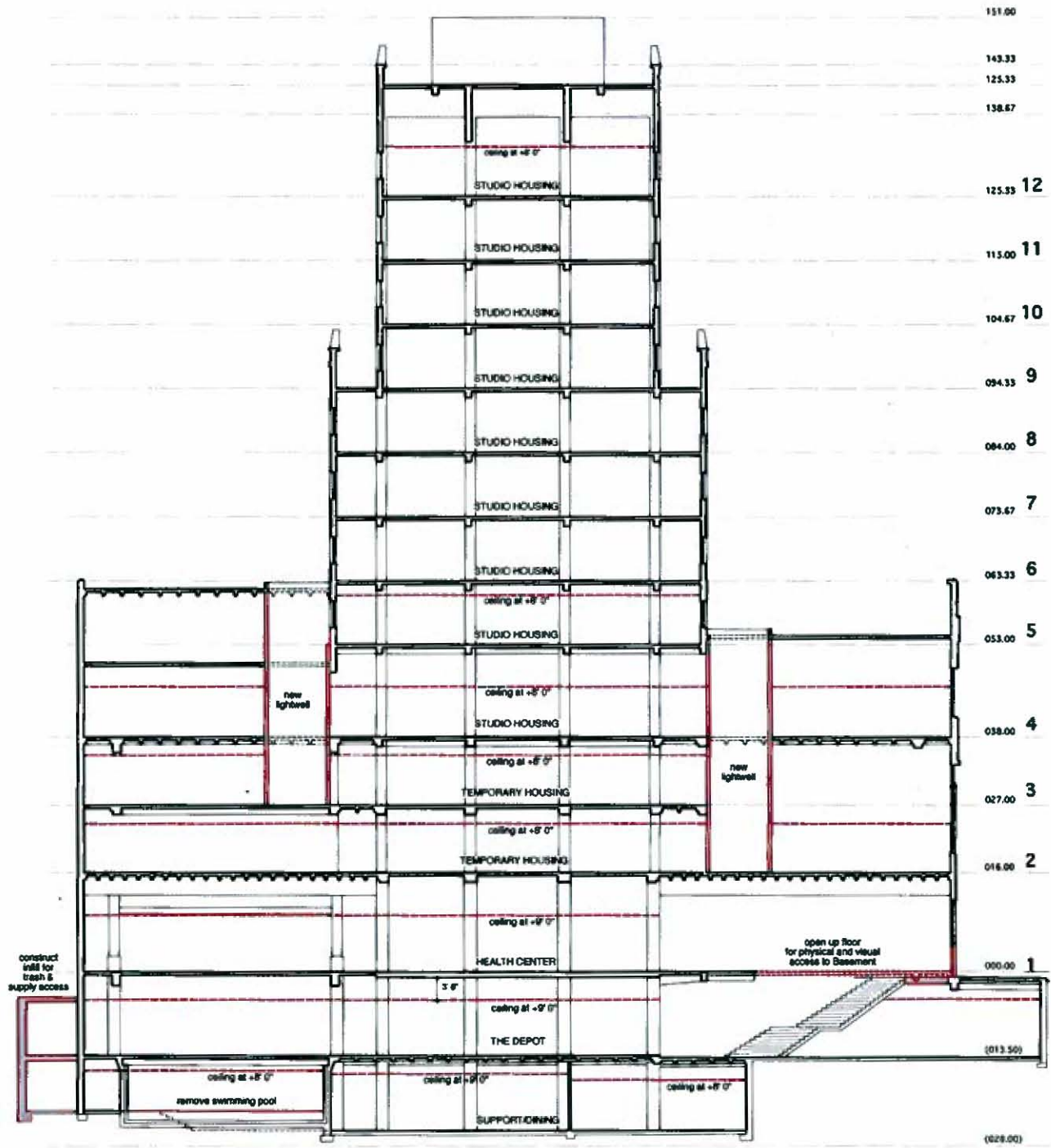
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117 N. 3rd St. Minneapolis, MN



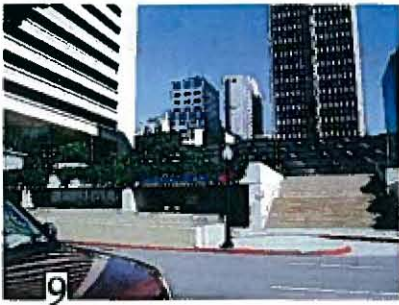
october 21, 2010

1250 Sixth Avenue
CONNECTIONS

ARCHITECTS Richard Bundy & David Thompson



october 21, 2010
 1250 Sixth Avenue
CONNECTIONS
 ARCHITECTS Richard Bundy & David Thompson



FAMILY HEALTH CENTERS
OF SAN DIEGO



october 21, 2010

1250 Sixth Avenue CONNECTIONS

ARCHITECTS Richard Bundy & David Thompson

**RECORDING REQUESTED
BY
Centre City Development
Corp.(CCDC)
PLANNING DEPARTMENT**

**WHEN RECORDED MAIL
TO
CCDC
PLANNING DEPT.
401 B Street, Suite 400
San Diego, CA 92101**

SPACE ABOVE THIS LINE FOR RECORDER'S USE

**CENTRE CITY
CONDITIONAL USE PERMIT/PLANNED DEVELOPMENT
PERMIT/NEIGHBORHOOD USE PERMIT NO. 2010-62
CONNECTIONS HOUSING
CITY COUNCIL**

This Conditional Use Permit/Planned Development Permit/Neighborhood Use Permit No. 2010-62 is granted by the City Council of the City of San Diego to City of San Diego/Connections Housing Downtown, L.P., Permittee, respectively, pursuant to San Diego Municipal Code Chapter 12, Article 6, Divisions 3 and 6. The site is located at 1250 Sixth Avenue in the Civic/Core neighborhood of the Downtown Community Planning Area. The project site is further described as Lots A through C and Lots J through L in Block 9 of Horton's Addition in the City of San Diego, State of California, according to map thereof made by L.L. Lockling on file in the office of the County Recorder of San Diego County, is located in the Employment/Residential Mixed-Use District/Employment Required Overlay District of the Downtown Community Planning Area; and,

Subject to the terms and conditions set forth in this Permit, permission is granted to the Permittee for a Conditional Use Permit/Planned Development Permit/Neighborhood Use Permit to operate uses as described and identified by size, dimension, quantity, type and location as follows and on the approved exhibits dated (*INSERT DATE OF FINAL PLANS*) on file in the offices of the City Clerk of the City of San Diego and the Centre City Development Corporation (CCDC).

1. **Conditional Use Permit**

The City Council hereby grants a Conditional Use Permit (CUP) for the Connections Housing facility (Facility) to contain the following uses:

January 27, 2011

- a. Primary Health Care Clinic providing comprehensive primary care with reception/waiting area, clinical space, healthcare for homeless program, and other enabling healthcare services (ground level).
- b. 150 bed Transitional Housing program for men and women (floors two and three).
- c. 75 permanent affordable supportive living units to include 2 manager units (floors four through twelve).
- d. Multi-use social service center for the homeless (Basement).
- e. Administrative Offices including full service kitchen for residents and employees, training facilities and storage (Sub-Basement).

2. **Conditional Use Permit for Historical Buildings Occupied by Uses Not Otherwise Allowed**

The City Council hereby grants a CUP to allow the conversion of employment to non-employment uses and to allow non-employment uses within the Facility to exceed 50 percent of the gross floor area within the Employment Required Overlay Zone pursuant to Centre City Planned District Ordinance (PDO) Section 156.0315 (d)(1-4).

3. **San Diego Register #865 - World Trade Center**

The building shall be rehabilitated according to the Secretary of Interior Standards for the Treatment of Historic Properties and guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings and the City of San Diego's Regulations for Historical Resources.

4. **Planned Development Permit**

The City Council hereby grants a Planned Development Permit (PDP) allowing for the following deviations:

- a. Deviations from the requirements of the PDO for Living Units as follows:
 1. Increase the average and maximum floor area requirements of PDO Section 156.0315(b) (1) from 300 to 390 and 400 to 640, respectively.
 2. Reduction in the common interior space requirements of PDO Section 156.0315 (b)(7) from 50 to 46 square feet per living unit.
- b. Deviations to the requirements of the San Diego Municipal Code (SDMC)/Land Development Code (LDC) for Transitional Housing as follows:

1. Reduction in the minimum sleeping space requirements of SDMC/LDC Section 141.0313(c) from 70 to 42 square feet of sleeping space for each resident, not including closet or storage space, multipurpose rooms, bathrooms, dining rooms, and halls.
2. Reduction in the minimum bathroom requirements of SDMC/LDC Section 141.0313(g) from one per seven beds to allow the following ratios: Second Floor (Men's) – 1 shower, 1 sink and 1toilet per 12 beds and 1 urinal per 11 beds.

5. **Neighborhood Use Permit**

The City Council hereby grants a Neighborhood Use Permit (NUP) allowing for the elimination of one parking space (0.5 spaces per unit) as required by PDO Section 156.0313 Table 156-0313A requiring one parking for two unrestricted managers' living units.

6. **Parking**

There shall be no off-street parking required for the proposed uses. Under the Centre City PDO, the conversion of one commercial use to another is exempted from parking under Section 156.0313(g). The Living Units containing income and rent restrictions at or below 40% average median income (AMI) levels are exempted from parking requirements under Section 156.0313 Table 156-0313A. The two managers' units are exempt from the parking requirements of Section 156.0313 Table 156-0313A as approved by the NUP. Transitional Housing parking requirements are established through the CUP review and approval process under PDO Section 156.0313, Table 156.0313A and no parking is required under the CUP for the Transitional Housing use.

Permitted uses for the Facility shall be subject to the conditions listed below:

7. **Living Units**

- a. 75 Living Units occupying floors 4 through 12; not including the two manager's units, occupancy and rent shall be restricted to those persons with household income at or below 40 percent of AMI as most published by the California Department of Housing and Community Development for San Diego County, as adjusted for a one-person household. The Permittee shall enter into an agreement with the City of San Diego Housing Commission for the review and enforcement of such restrictions.
- b. The Permittee shall comply with the following conditions listed in PDO Section 156.0315 (b) of the Centre City PDO with the exception to those conditions approved by the PDP/NUP.
 1. The maximum occupancy for a living unit is two persons.
 2. Kitchen facilities with at least a kitchen sink, garbage disposal, counter top, refrigerator, and microwave oven or cook-top is required for every living unit.

3. A complete bathroom is not required in every living unit. However, at least one private toilet must be provided and be screened from the remainder of the unit.
4. Each living unit that is not provided with a private shower or bathtub must be served by a shared shower or bathtub. Shared bathing facilities must be provided at a ratio of at least one facility for every five units, or fraction thereof, which lack private bathroom facilities. Each shared bathing facility must be on the same floor as the units it is intended to serve, must be directly accessible from a common area or hallway, and must have an interior lockable door.
5. Each living unit must be pre-wired for phone and cable television service.
6. A minimum of one living unit shall be occupied by a resident manager.
7. The Facility shall provide a front desk with a full view of the entry area, staffed 24 hours a day, seven days a week; or provide an operational outdoor entry intercom system connected to the manager's unit and each living unit.

8. **Transitional Housing**

- a. The Permittee shall provide 150 Transitional Housing beds located on the second and third floors of the Facility. There will be approximately 94 beds for men on the second floor and 56 beds on the third floor. On-site management and security staff shall be present at all times.
- b. The Permittee shall comply with the following conditions listed in Section 141.0313 of the SDMC/LDC with the exception to those conditions approved by the PDP.
 1. Only one transitional housing facility may be permitted per lot or premises.
 2. Sleeping areas shall not be used as a public or general passageway to another room, bath, or toilet.
 3. The Facility shall provide at least 5 square feet of living area per bed, not including sleeping space, dining areas, and kitchen areas.
 4. The Facility shall provide at least 8 square feet of storage area (closet or drawers) per bed.

9. **Multi-Use Service Center (Center)**

- a. The Permittee shall operate a Multi-Use Social Service Center for the homeless, with counseling offices, personal care facilities, case management; service needs assessments and referrals to housing and other on-site or off-site service providers. The Center shall host multiple providers to provide services, including; but not limited to, veterans services, legal services, benefits advocacy and employment services. All

providers shall be responsible for ensuring their operations comply with all applicable conditions of the CUP.

- b. The Center shall not operate as a Congregate Meal Facility offering meals to the general public.
- c. The Center may be open seven days of the week. The Center may open no earlier than 6a.m. and close no later than 9p.m.
- d. All activities associated with the Center shall occur within the confines of the building.
- e. The Center shall provide on-site supervision at all times.
- f. Only those clients actively participating in a program of the Center may utilize the personal care facilities.

10. **Primary Health Care Clinic (Clinic)**

The Clinic and main reception area shall be located on the first floor. The reception area shall include a large space for waiting clients, restrooms, offices for intake/assessment and case management. The Clinic will have a separate entrance and waiting room. The Clinic will provide comprehensive primary care, medical and mental health services, allowing homeless individuals to access health care as part of their regular routine of services. The Clinic shall no operate as a hospital, 24-hour emergency clinic, intermediate care facility or nursing facility. The Clinic may be open during the following hours seven days of the week: Monday through Friday open no earlier than 6a.m. and close no later than 9p.m., Saturday open no earlier than 8a.m. and close no later than 5 p.m., Sunday open no earlier than 8:00a.m. and close no later than 12:00p.m.(Noon).

- 11. A sign shall be posted at the project entrance identifying the Facility, listing the services offered and hours of operation, rules of persons entering the Facility, and contact numbers for the Facility, Neighborhood Code Compliance for filing of any complaints.
- 12. Patrons, residents, and visitors of the Facility shall comply with the Rules of Conduct (attached Exhibit 1) and shall be advised by staff that loitering is prohibited in the area before, during, or after the hours of operation.

13. **Neighborhood Advisory Committee (NAC)**

- a. A Neighborhood Advisory Committee (NAC) (attached Exhibit 2) shall be established by the Permittee to give regular input on the operation of the facility. The advisory group shall be formed within 30 days of the approval of this Permit and shall consist of representatives of residents, business owners and property owners within a quarter mile radius of the facility, local community, neighborhood and business organizations. The NAC shall also include a staff member from the office of the City Council member representing Downtown San Diego and a member of the Mayor's office. The Permittee shall meet with the NAC on a quarterly basis. If an earlier meeting is requested by

the NAC based on an urgent matter, the Permittee shall reasonably attempt to accommodate the request.

b. The Permittee shall provide the following reports to the NAC:

1. Quarterly summary of incidents logged by the private security of the Facility.
2. Annual report of compliance with this permit, including a summary of incidents logged by the private security for the facility, as well as incidents logged by the San Diego Police Department, and private security for adjacent properties if provided. The report shall be delivered no later than February 1 of the year following the reporting year.

14. **Communications/Litter and Loiter Plan**

The Permittee shall strictly enforce the Communications/Litter and Loiter Control Plan created to remove litter, discourage loitering and maintain communication with the immediate neighborhood (attachment 3) The Communications /Litter and Loiter plan shall also establish a street outreach response team and an e - mail/telephone response system for neighbors within ¼ mile of the Facility, the NAC and any interested parties. The street outreach team shall be staffed during normal business hours.

15. **Security Plan**

The Permittee shall develop and maintain a Security Plan for the Facility. The Security Plan shall be provided to the NAC for comment and the final Security Plan provided to CCDC and the City's Neighborhood Code Compliance Department (NCCD) prior to issuance of occupancy permit for the Facility. The Security Plan shall contain, at a minimum, the components and provisions as shown in Exhibit 4. The minimum requirements, including, but not limited to, security personnel and video surveillance, shall not be reduced without approval of an amendment to this Permit.

16. **Lighting**

All private outdoor lighting shall be shaded and adjusted to fall on the same premises where such lights are located. Prior to issuance of any occupancy permits, a night inspection shall be required to verify compliance of the outdoor lighting system.

17. **Rooftop**

No mechanical equipment, tank, duct, elevator enclosure, cooling tower or mechanical ventilator or air conditioner shall be erected, or constructed, converted or established, altered, or enlarged on the roof of any buildings, unless such equipment and appurtenances are screened and contained within a completely enclosed structure.

18. **Utilitarian Areas**

- a. Areas housing trash, recyclable materials or other utility services shall be completely concealed from view of the right-of-way and adjoining properties, except for utilities required to be exposed by the City or utility company.
- b. The project shall provide trash and recyclable material storage as follows:
 1. A minimum of one interior trash and recyclable materials storage area shall be provided for each Living Unit.
 2. A minimum of two trash and recyclable material storage areas shall be provided for the Facility.

19. **12-Month Review**

Twelve months (12) after the commencement of operations, this permit shall be reviewed by the San Diego City Council at a duly noticed public hearing to ensure conformance with the conditions stated herein. Based on testimony received at the hearing, the City Council may consider modifications to, or revocation of, the permit.

20. The subject property and associated common areas on site shall be maintained clean and free of graffiti at all times.
21. This Permit may be revoked or modified by the City of San Diego following a public hearing pursuant to the authority and procedures outlined in the SDMC/LDC, which may include any complaint or report from the NAC.
22. The Permittee shall secure all necessary building permits. The Permittee is informed that to secure these permits, substantial modifications to the building and site improvements to comply with applicable building, fire, mechanical and plumbing codes and State Law requiring access for disabled people may be required.
23. This Permit is a covenant running with the subject property and shall be binding upon the the Permittee and any successor or successors, and the interest of any successor shall be subject to each and every condition set out in this Permit and all referenced documents.
24. No permit for construction, operation or occupancy of any facility shall be granted nor shall any activity authorized by this Permit be conducted on the premises until the Permit is recorded by the Office of the San Diego County Recorder.
25. Unless this Permit has been revoked by the City of San Diego, the property included by reference within this Permit shall be used only for the purposes and under the terms and conditions set forth in this Permit.

26. Any future requested amendments to this Permit shall be reviewed for compliance with the regulations of the underlying zone(s) which are in effect on the date of the submittal of the requested amendment.
27. All of the conditions contained in this Permit have been considered and have been determined necessary in order to make the findings required for this Permit. It is the intent that the holder of this Permit be required to comply with each and every condition in order to be afforded the special rights which the holder of the Permit is entitled as a result of obtaining this Permit. It is the intent that the Permittee of the property, which is subject to this Permit, either utilize the property for any use allowed under the zoning and other restrictions which apply to the property or, in the alternative, that the Permittee of the property be allowed the special and extraordinary rights conveyed by this Permit, but only if the Permittee complies with all the conditions of this Permit.

In the event that any condition of this Permit, on a legal challenge by the Permittee of this Permit, is found or held by a court of competent jurisdiction to be invalid, unenforceable, or unreasonable, this Permit shall be void. However, in such an event, the Permittee shall have the right, by paying the applicable processing fees, to bring the request for a new Permit without the "invalid" condition(s) back to the discretionary body which approved the Permit for a determination by that body as to whether all of the findings necessary for the issuance of the proposed Permit can still be made in the absence of the "invalid" conditions(s). Such hearing shall be a hearing de novo and the discretionary body shall have the absolute right to approve, disapprove, or modify the proposed Permit and the condition(s) contained therein.

Passed and adopted by the City Council of the City of San Diego on _____.

January 27, 2011

EXHIBIT 1

CONNECTIONS HOUSING

REGULATIONS AND RULES OF CONDUCT FOR PATRONS, RESIDENTS AND VISITORS

1. Anyone engaging in behavior that is disruptive, threatening, violent or illegal will be asked to leave the premises. Lease documents between Connections Housing and residents of the permanent supportive housing units will contain a provision that such behavior will be grounds for eviction.
2. No Weapons
3. No trays, napkins, plates, utensils, or food shall be removed from the dining area.
4. No loitering or queuing around the outside of the Facility shall be permitted at any time.
5. No illegal drugs allowed in the Facility.
6. No alcohol allowed in the multi-service center, health clinic, or transitional housing programs.
7. No alcohol allowed in any public space in the permanent living units of the Facility.
8. No smoking inside the Facility, except in designated smoking areas.
9. No unattended children. All children must be accompanied by adult.
10. Belongings may be searched and checked into the storage area should security deem it necessary.
11. Each resident of permanent living unit will sign a lease with specific Facility rules and regulations. Any illegal behavior in the Facility or around the building will not be allowed, and will be grounds for expulsion.
12. Each resident of the transitional housing program will sign house rules that are designed to ensure the community's safety and security. Any illegal behavior in the Facility or around the building will not be allowed, and will be grounds for expulsion.
13. All residents of the Facility will be screened to verify they are not registered sex offenders via California Megan's Law. Intake specialist will also perform intensive pre-screening interviews.

EXHIBIT 2

CONNECTIONS HOUSING

NEIGHBORHOOD ADVISORY COMMITTEE (NAC)

An advisory committee shall be formed to facilitate appropriate interchange and beneficial collaboration between Connections Housing and the surrounding community. This NAC shall work with neighborhood residents, businesses, and organizations to develop and recommend remedies that would enhance such interaction. The NAC will be composed of one representative from each of the following groups (selected by Connections Housing in consultation with District 2, the San Diego Housing Commission, and CCDC):

1. Business Representative- From an office-type business within ¼ mile to be nominated by BOMA
2. Property Owner- Owns property within ¼ mile radius to be nominated by NAIOP
3. Resident- Living within ¼ mile from Connections Housing from the Cortez Neighbors Group
4. Resident- Living within ¼ mile from Connections Housing from the Downtown Residents Group
5. Child Care Center, located at 600 B Street, San Diego, CA 92101
6. Downtown San Diego Partnership
7. Downtown Mental Health Agency
8. Downtown Neighborhood Group
9. Downtown Homeless Service Provider
10. Faith Community- From parish or faith group located in Downtown San Diego
11. Medical Community- Representing an individual or organization that delivers care to Downtown homeless persons
12. Connections Housing- Mall & Transitional Housing- PATH
13. Connections Housing- Permanent Supportive Housing- Affirmed Housing
14. Ad Hoc Members:
 - Council District 2 Representative
 - Mayor's Office Representative
 - Centre City Development Corporation
 - San Diego Police Department Homeless Outreach Team

The NAC will be formally established prior to commencement of operations. NAC meetings shall be hosted and coordinated by Connections Housing. The NAC shall meet on a quarterly basis, unless an earlier meeting is requested on an urgent matter. The NAC shall exist in perpetuity or until it is no longer necessary. The purpose of the NAC shall be to review, evaluate, and provide solutions to improve the interaction between the Downtown Community and Connections Housing, focusing on the area approximately a quarter mile from the Connections Housing Downtown San Diego site at 1250 Sixth Avenue

EXHIBIT 3

CONNECTIONS HOUSING

COMMUNICATIONS/LITTER AND LOITER CONTROL PLAN

1. Connections Housing shall establish and strictly enforce Regulations and Rules of Conduct applicable to all persons using the Facility.
2. Personnel shall be provided 24 hours a day for the enforcement of the hours of operations, to maintain order and to prevent vandalism and loitering both on and off-site. Personnel shall observe the area in a one block radius around the facility.
3. Connections Housing shall install 24 hour recorded video surveillance of the site to monitor activity within the Facility and along the sidewalk adjacent to the Facility. Security video shall stream directly to San Diego Police Department (SDPD) vehicles, if requested by the SDPD.
4. Patrons, residents and visitors of Connections Housing shall be prohibited from queuing outside the Facility.
5. There shall be no loitering outside the Facility. Connections shall post anti-loitering signs near all entrances to the Facility. At least twice each day a Connections Housing employee or subcontractor shall inspect the site and discourage loitering.
6. Connections Housing shall sign a letter of agency giving the City of San Diego Police Department permission to enter the property as necessary to enforce laws.
7. Connections shall provide private security licensed and in good standing with the State of California Bureau of Security and Investigative Services. Connections will provide a minimum of one security guard at the Facility at all times (24 hours) and one additional security guard on duty during business hours.
8. Connections shall, at its own cost and expense, be responsible for trash abatement on the site and within 100 feet of the Facility entrances, and shall keep the area free of graffiti, litter, trash, and other related nuisances.
9. At least twice each day a Connections Housing Employee or sub-contractor shall inspect the site and sweep the sidewalks. At its own expense, Connections Housing shall provide sweeping and litter control for the site.
10. Any hypodermic needles shall be disposed of in accordance with County Health Development standards.
11. A Neighborhood Advisory Committee shall be established as set forth in Exhibit 2 to facilitate appropriate interchange and beneficial collaboration between Connections Housing and the surrounding community.
12. A street outreach response team (minimum of two people) shall be established and an e-mail/telephone response system shall be provided to neighbors within ¼ mile of the Facility, the NAC, and any interested parties. The street outreach team is to be staffed

during normal business hours. Responsibilities of the street outreach team include: direct engagement with homeless persons on the streets, coordinating efforts with both law enforcement and business security teams, responding to requests for services from the community, regular assessment of homeless population in the area, regular updates to the community, and educate neighbors on how to respond to homelessness.

EXHIBIT 4

CONNECTIONS HOUSING

SECURITY PLAN

1. **Security:** Connections Housing will hire a private security company in good standing and licensed with the State of California Bureau of Security and Investigative. Minimum staffing shall include:
 - a. One (1) security guard on the premises twenty-four (24) hours a day, seven days a week; One (1) additional security guard on the premises at least hour before and during the time either the Service Center or Health Clinic are open to the public. The health clinic shall have an additional security team on call should a crisis occur.
 - b. A security guard shall survey public sidewalks adjacent to the Facility at least one hour prior to the opening of the Service Center or Health Clinic to discourage any potential queuing or loitering. The security guard shall open the Facility waiting area and direct people inside should there be any line forming outside prior to opening the Health Clinic or Service Center.
2. **Video Surveillance:** 24 hour recorded video surveillance shall be provided to monitor within the building and along the sidewalk adjacent to the building.
 - a. Security cameras shall be installed at all exterior entrances, exterior corners outside the building, interior stairs and elevators, and in the main hall of the multi-service homeless center.
 - b. Security personnel shall monitor video cameras. Should a security guard need to leave the camera station, another staff member trained in security procedures shall provide coverage.
 - c. Security cameras shall be made available to the San Diego Police Department (SDPD) vehicles, if requested by the SDPD.
3. **Security Plan:** A Security Plan and Standard Operating Procedures will be implemented for Facility security which details the duties and responsibilities for policing the site and adjacent areas.

The Security Plan and Standard Operating Procedures Manual shall include the following:

- a. A listing of general site rules and specific officer duties to include the following minimum conditions.

1. Security officers shall not leave his/her post of patrol area for any reason.
 2. Security officers must remain on continuous patrol when not dealing with an incident.
 3. All security officers shall be well versed with the emergency procedures of the post for the safety of residents, clients, and visitors.
 4. Loitering on-site is not permitted. Politely inform them of this and as that they leave the premises.
 5. Security officers shall do a complete patrol of the interior of the facility, adjacent sidewalks, and stairwells at the beginning and ending of their shift.
- b. A list of important contact information (telephones, e-mails) should emergencies arise to include:
1. Director of Security
 2. Property Manager
 3. San Diego Police Department HOT team and Non-Emergency line
 4. City of San Diego Neighborhood Code Compliance Department
 5. Alarm System
 6. PATH
- c. Code of Conduct to include:
1. Responsibilities and procedures for employees.
- d. Procedure for Contact Implementation and Post Instruction to include:
1. Responsibilities & procedures in the implementation of new contracts & post instructions.
 2. Responsibilities and procedures for patrol supervisory and command personnel regarding post instructions
 3. Copies of post instructions
 4. Supervisor visits
 5. Services changes
 6. Emergencies, special assignments
- e. Attendance Warnings to include:
1. Responsibilities and procedures for security guards
 2. Attendance memoranda
 3. Tardiness
- f. Incident Reports to include:
1. Responsibilities and procedures for members of Security Team
 2. Responsibilities and procedures for supervisory and command personnel

3. Disposition of reports

g. Alarm Response

1. Definitions
2. Search
3. Key control
4. Alarm response documentation
5. Billing Procedures

h. Scheduling

1. Setting up a post

ENVIRONMENTAL SECONDARY STUDY

FOR THE

CONNECTIONS HOUSING PROJECT

JANUARY 2011

Prepared for: City of San Diego Redevelopment Agency
1200 Third Avenue, 14th Floor
San Diego, California 92101

Preparation Administered by: Centre City Development Corporation
401 B Street, Suite 400
San Diego, California 92101

Prepared by: AECOM
1420 Kettner Boulevard, Suite 500
San Diego, California 92101

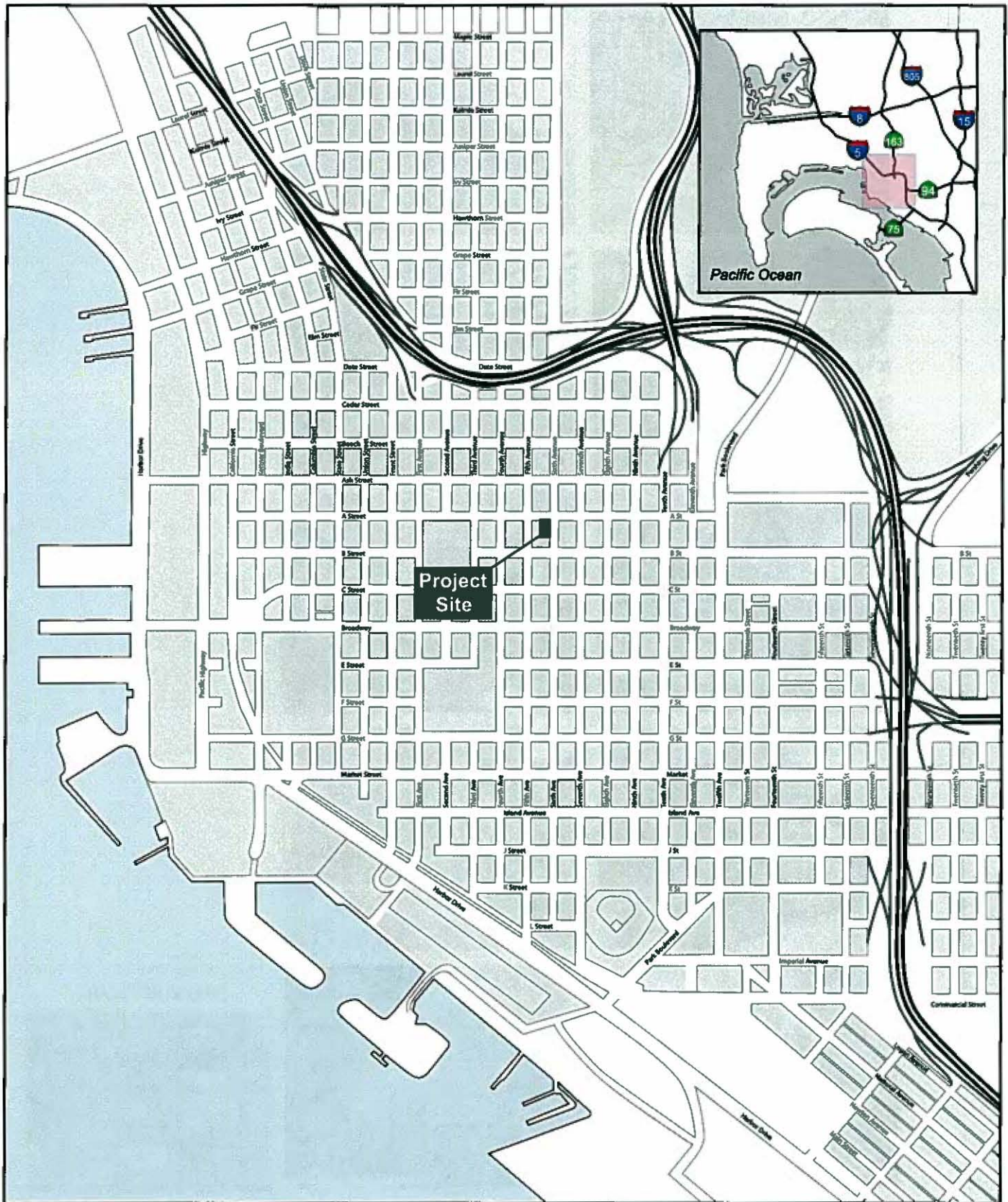
ENVIRONMENTAL SECONDARY STUDY

1. **PROJECT TITLE:** Connections Housing
2. **APPLICANT:** Affirmed Housing Group (AHG)
3. **PROJECT LOCATION:** The project site is located at 1250 Sixth Avenue. The site is located at the southwest corner of A Street and Sixth Avenue in the Civic Core neighborhood of the Downtown Community Plan area in the City of San Diego (Figure 1). The Downtown Community Plan area (downtown planning area) includes approximately 1,500 acres of the metropolitan core of San Diego, bounded by Interstate 5 (I-5) on the north and east and San Diego Bay on the south and southwest. Centre City is located 15 miles north of the United States International Border with Mexico.
4. **PROJECT SETTING:** The Final Environmental Impact Report (FEIR) for the San Diego Downtown Community Plan, Centre City Planned District Ordinance (PDO), and Redevelopment Plan for the Centre City Project Area describes the existing setting of the downtown planning area, including the Core neighborhood. This description is hereby incorporated by reference.

Located at 1250 Sixth Avenue in the Civic Core neighborhood of the Downtown Community Plan Area, the proposed project would rehabilitate and convert the historical World Trade Center building (formerly known as the San Diego Athletic Club) into a one-stop service center and affordable housing for the homeless population. The multi-use project consists of 75 permanent supportive living units (includes two managers units), 150 transitional housing beds, a primary health care clinic, administrative offices, and a multi-use social service homeless center.

The building was constructed in 1928 and uses included athletic facilities, assembly space, offices and 96 sleeping rooms on the upper floors. The building was converted to office and storage space in the late 1960s. The building is currently being occupied by office uses. The other buildings on the block include a 24-story office building (Union Bank) and a six-level, 250-space public parking garage. Directly east of the project site, the 24-story Bridgepoint building encompasses the entire block, providing primarily office space, but also includes the Kiddie Hall Preschool located in a fenced, enclosed area on the north side of the site. The surrounding blocks include a mix of office uses, financial institutions, parking structures and surface parking lots, residential uses, hotels, and commercial uses in buildings of varied heights (Figure 2).

Applicable plans and policies governing the site are the San Diego Downtown Community Plan, Redevelopment Plan for the Centre City Redevelopment Project and the 11th amendment thereof, Centre City Planned District Ordinance (PDO) and the amendments thereof, and the Land Development Code (LDC). The project is not located in the coastal zone. The PDO Land Use District for the site is Civic Core (C), and is intended to serve as a high-intensity office and employment center. The C District operates as a center of regional importance and as a primary hub for businesses, communications, offices, and hotels, with fewer restrictions on building bulk and tower separation than in other districts. Mixed-use development shall be accommodated as an important component of the area's vitality. Retail, educational, entertainment, residential, civic, governmental, and cultural uses are permitted.



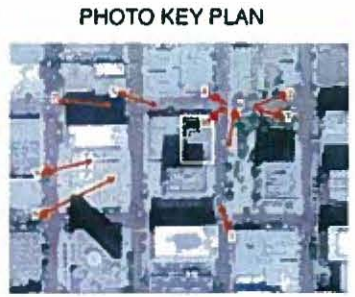
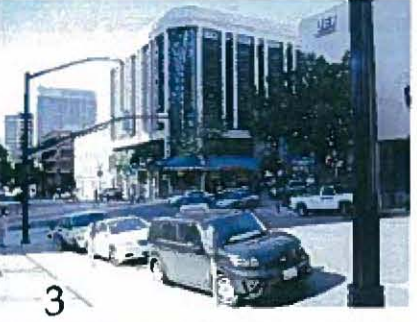
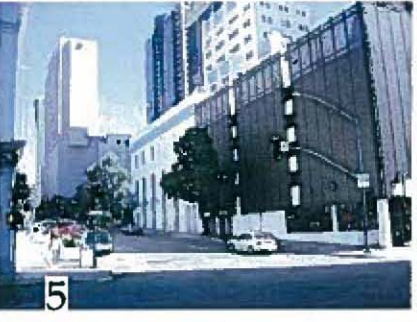
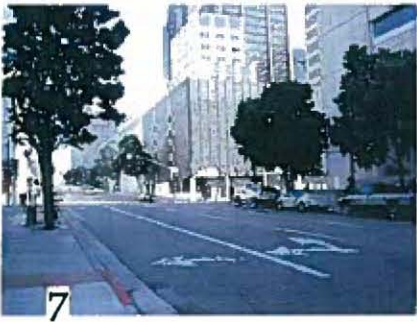
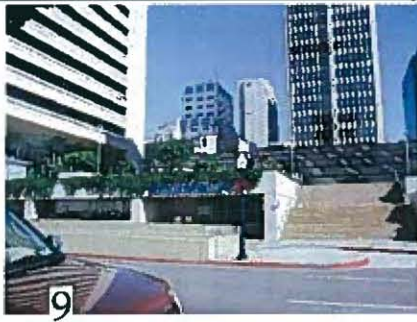
Source: EDAW 2007



Connections Housing
CCDC Secondary Study

Figure 1
Regional Location and Vicinity

January 2011



Source: Architects Richard Bundy & David Thompson 2010



No Scale

Connections Housing
CCDC Secondary Study

Figure 2
Surrounding Land Uses

January 2011

Under the PDO, a conditional use permit (CUP) is required for the on-site provision of social services and transitional housing within this district. The site is also located within the Employment Required Overlay Zone which requires at least 50 percent of the gross floor area (GFA) within a development to be dedicated to employment uses such as professional office, education, cultural uses, retail, hotel or other similar commercial uses. Residential uses in this district cannot exceed more than 50 percent of the GFA against the base FAR. In addition, floor area currently devoted to employment uses may not be converted to non-employment uses within this overlay zone. However, the PDO permits uses not otherwise permitted to be located within historical buildings through the review of a CUP pursuant to Section 156.0315(d).

The proposed project therefore requires a CUP to allow the following uses: (1) Social Services; (2) Transitional Housing; and (3) Uses not otherwise permitted within a historical resource. The CUP would contain certain conditions under which the property would be required to operate, such as on-site security, prevention of queuing and loitering, background check of residents, rules of resident and patient conduct, and hours of operation.

A Planned Development Permit (PDP) is required to allow for (1) a deviation from the PDO standards to allow for the increased size of living units from an average of 300 square feet to 390 square feet and maximum size from 400 square feet to 430 square feet for the 75 living units; and, 2) deviations from Land Development Code (LDC) standards for transitional housing facilities, including but not limited to living area per bed, storage areas, and restroom facilities.

5. PROJECT DESCRIPTION: This Secondary Study analyzes the potential environmental impacts associated with the proposed Connections Housing project (proposed project). The proposed project includes the rehabilitation and conversion of the historical World Trade Center building into a one-stop service center and affordable housing for the homeless population. The building is a 12-story over two underground levels, cast-in-place reinforced concrete building with varying floor-to-floor heights and a gross floor area of 116,376 square feet. The existing conditions and the proposed project are described in further detail in the paragraphs below.

Existing Conditions

The World Trade Center building is locally designated Historical Resource Board (HRB) Site # 685. It was built in 1928 and originally known as the San Diego Athletic Club. The City of San Diego (City) acquired the building in 2004, and has been used for office purposes since that time. The building's design is primarily Art Deco with Gothic Revival details and is a rare example of the "New York Skyscraper" influence in San Diego. According to the building assessment prepared by Heritage Architecture and Planning, the building's interior finishes were significantly altered during the conversion of the building from the San Diego Athletic Club to office space, and the original character of the interior is no longer evident and cannot be identified. The majority of the historic detailing and cast-stone ornamentation on the building's exterior are still extant. Most of the roofing is in poor condition, beyond its life expectancy, and is in need of replacement. Voluntary seismic upgrades are anticipated as part of the proposed renovation.

Proposed Project

The proposed project includes the rehabilitation and conversion of the historical World Trade Center building described above into a one-stop service center and affordable housing for the homeless. The multi-use project consists of 75 permanent supportive living units (includes two managers units), 150

transitional housing beds, a primary health care clinic, administrative offices, and a multi-use social service homeless center.

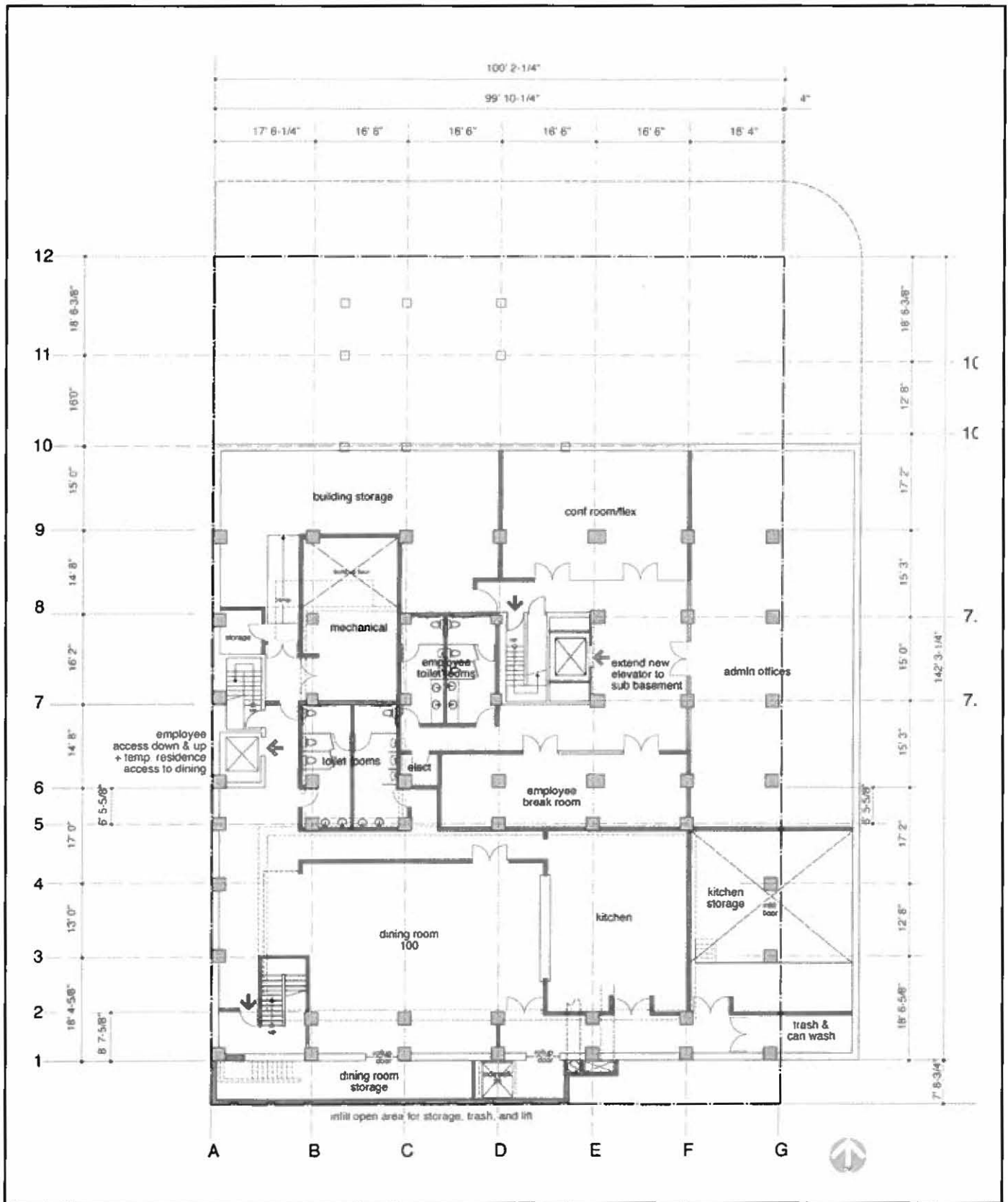
Administrative offices and kitchen uses would be located on the subbasement level (Figure 3). The multi-service center would be located on the basement floor and would be approximately 17,300 square feet (Figure 4). The multi-service center would be designed as a one-stop center where anyone in need can come for information, personal care (showers and haircuts), service needs assessments, case management and referrals to housing and other on-site and off-site service providers. The multi-service center would host multiple providers for services such as veteran's services, legal services, benefits advocacy, employment services, case management, substance abuse treatment, and housing referrals.

The health clinic would be located on the ground level and would be approximately 13,600 square feet (Figure 5). The medical clinic would be a comprehensive primary care community health center with a reception/waiting room area, clinical space for medical and mental health services, and other enabling supportive health care services that would allow homeless individuals to access health care as part of their regular routine.

The transitional housing would be located on floors 2 and 3 of the building (Figures 6 and 7). Approximately 25,000 square feet would be dedicated to this use, and 150 transitional beds would be provided. These transitional beds would be set up in cubicles with individual twin beds. Each floor would have a small residential community kitchen, common lounge areas, laundry facilities, small lockers for each resident, and staff offices. Residents entering interim housing would sign house rules that are designed to address the community's safety and security.

Floors 4 through 12 would be dedicated to affordable permanent supportive living units consisting of 75 units (includes two manager's units) totaling approximately 47,000 square feet, with kitchenettes and private American with Disabilities Act (ADA)-compliant bathrooms (Figures 8 through 16). Common areas and on-site laundry facilities would also be located on these residential floors. These supporting housing units would operate as any other apartment building, where each resident would sign a lease with specific building rules.

As stated earlier, the parking structure adjacent to the building is not part of the original building constructed in 1928, is not a designated historical resource, and is not part of the proposed project.



Source: Architects Richard Bundy & David Thompson 2010

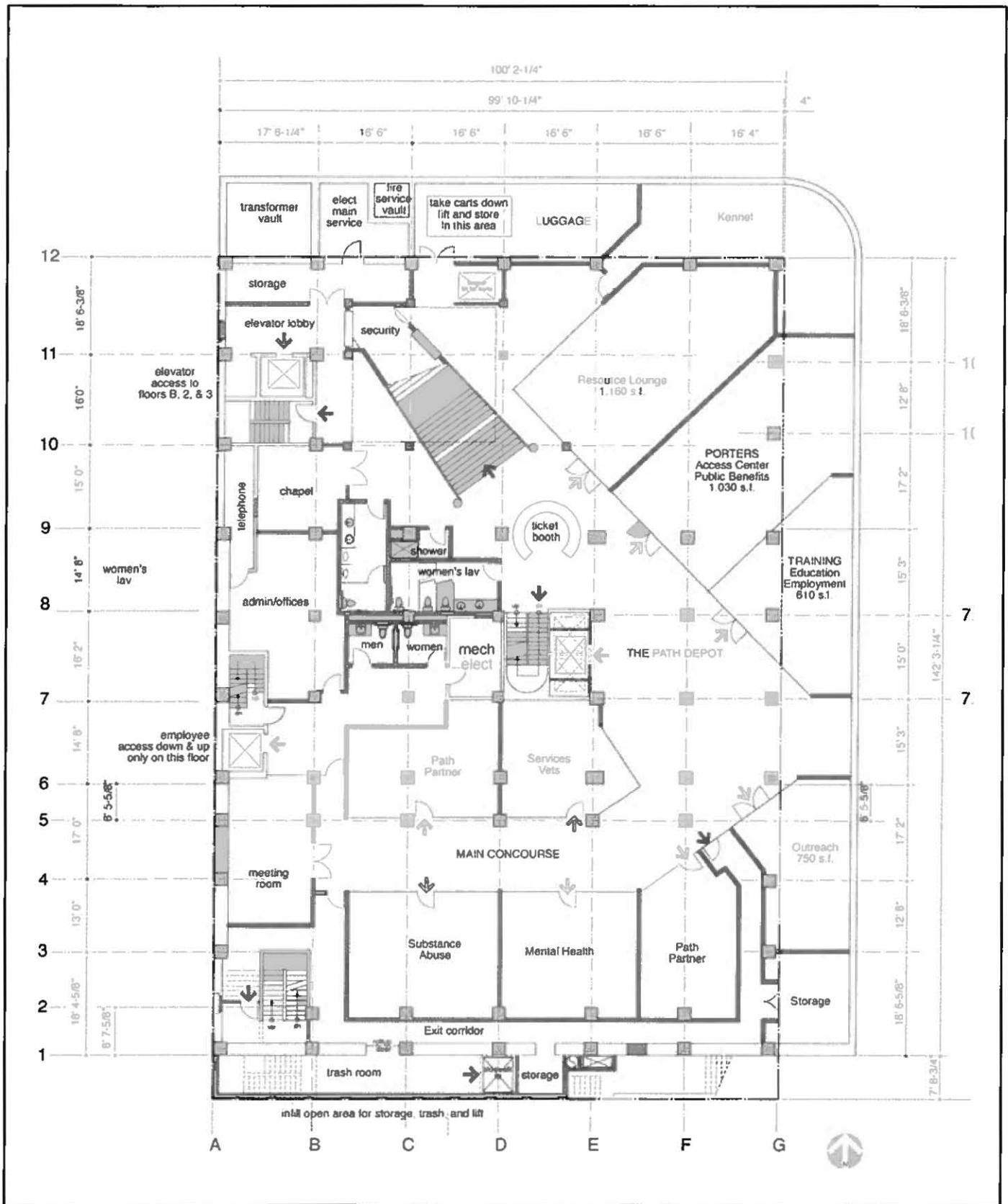


No Scale

Connections Housing
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Figure 3
Sub Basement Plan

January 2011



Source: Architects Richard Bundy & David Thompson 2010

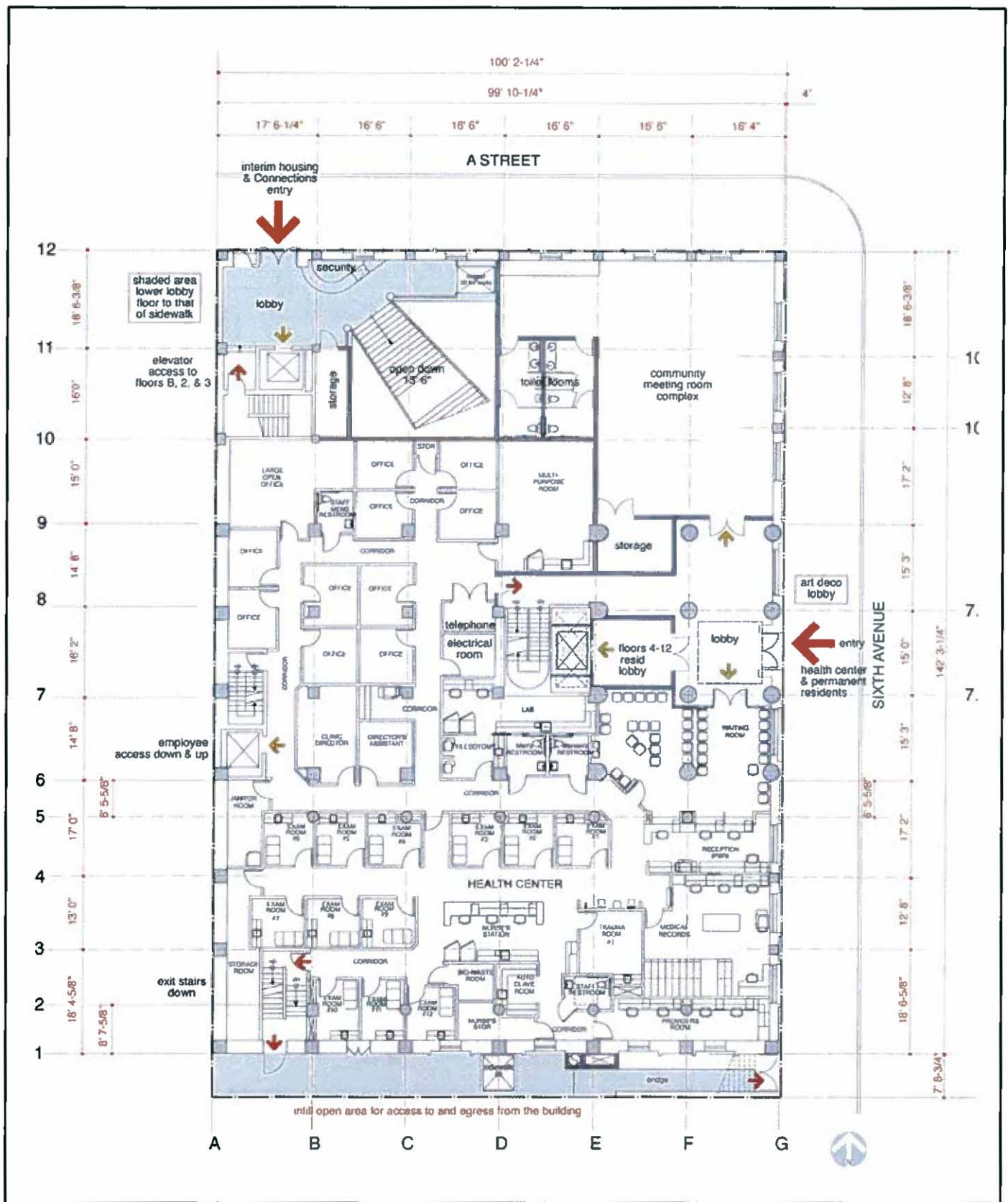


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Connections Housing
CCDC Secondary Study

Figure 4
Basement Plan

January 2011



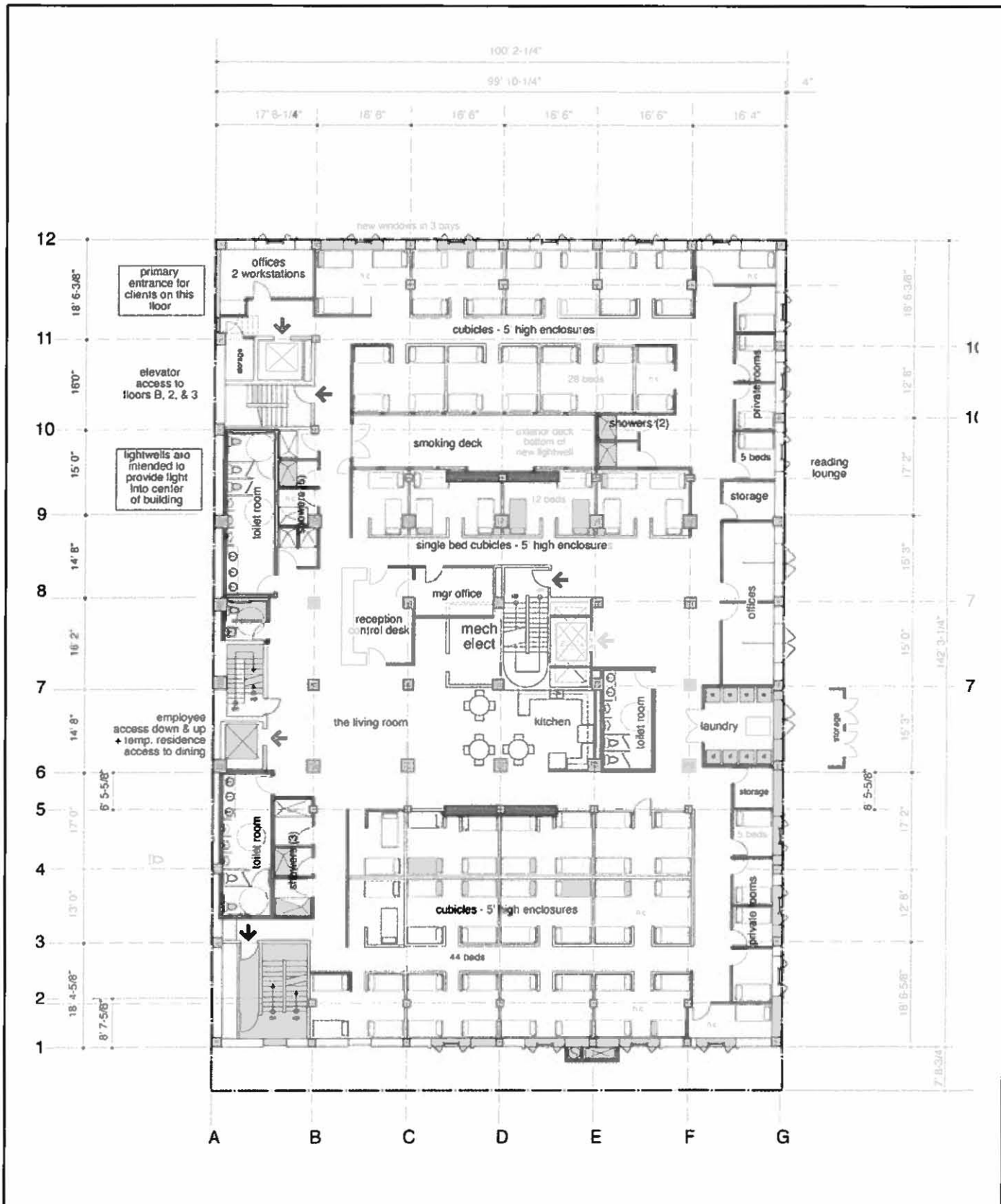
Source: Architects Richard Bundy & David Thompson 2010



Connections Housing
CCDC Secondary Study

Figure 5
Ground Floor Plan

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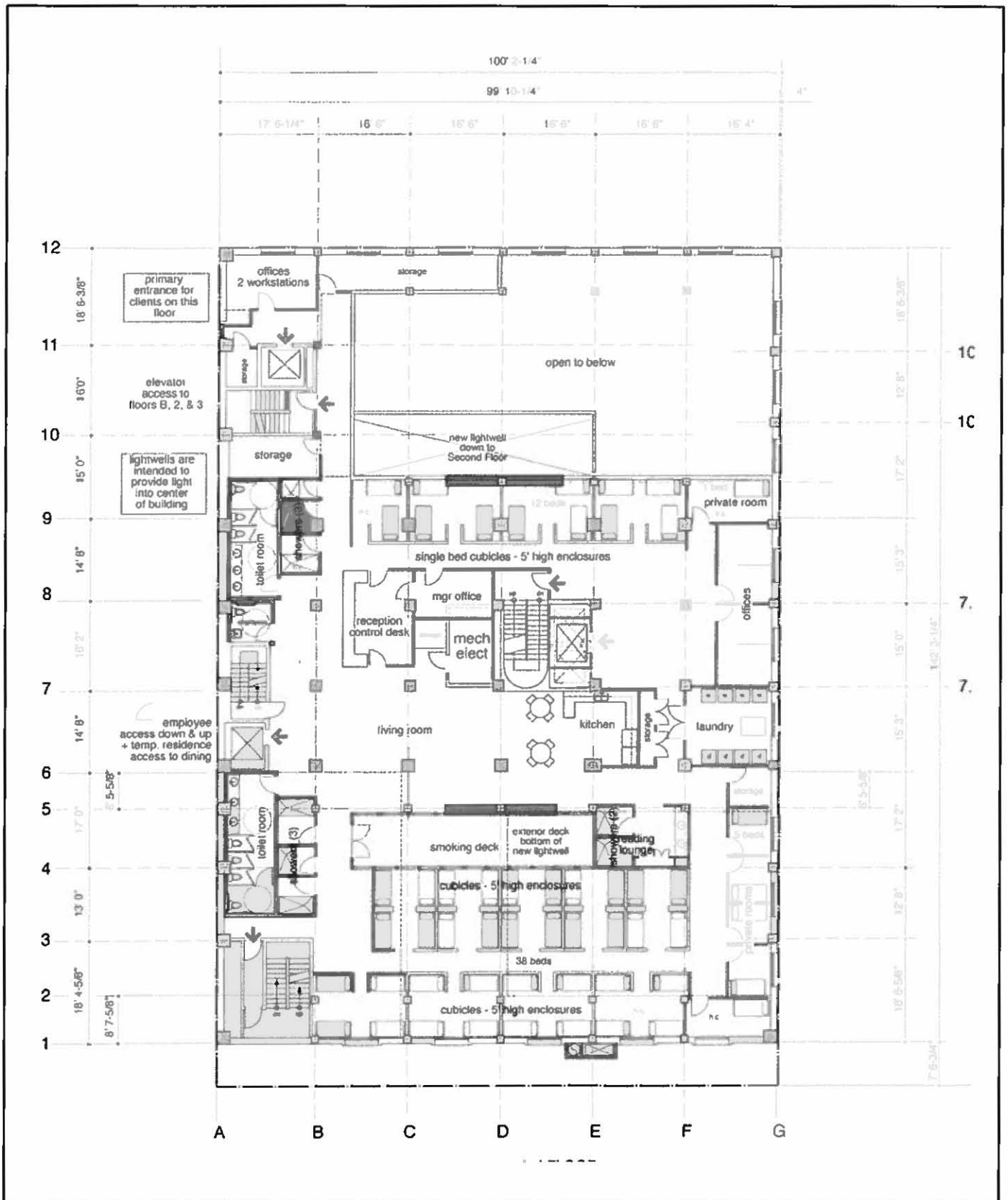
Source: Architects Richard Bundy & David Thompson 2010

Figure 6
Second Floor Plan

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Connections Housing
CCDC Secondary Study

January 2011



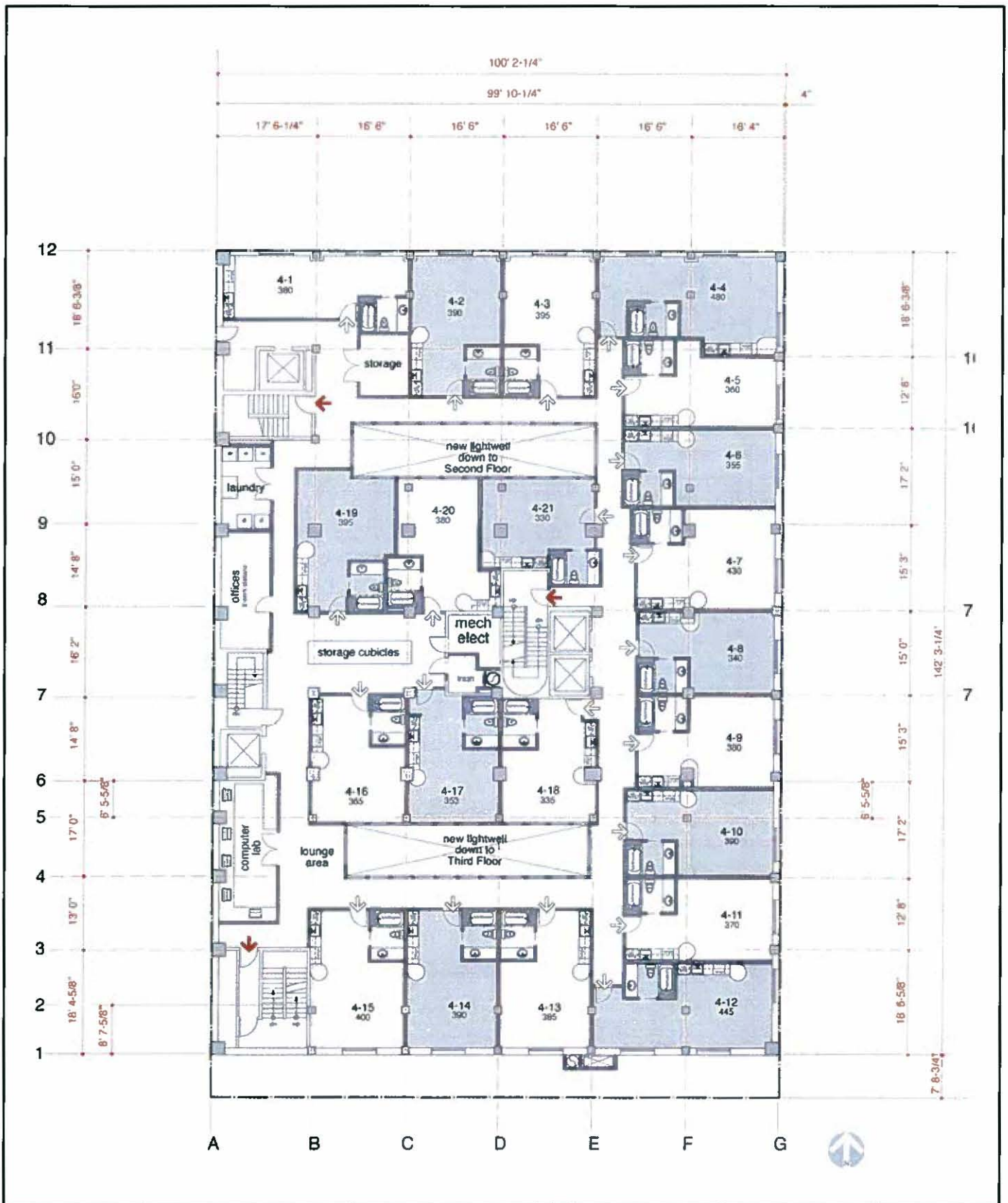
Source: Architects Richard Bundy & David Thompson 2010



Connections Housing
CCDC Secondary Study

Figure 7
Third Floor Plan

January 2011



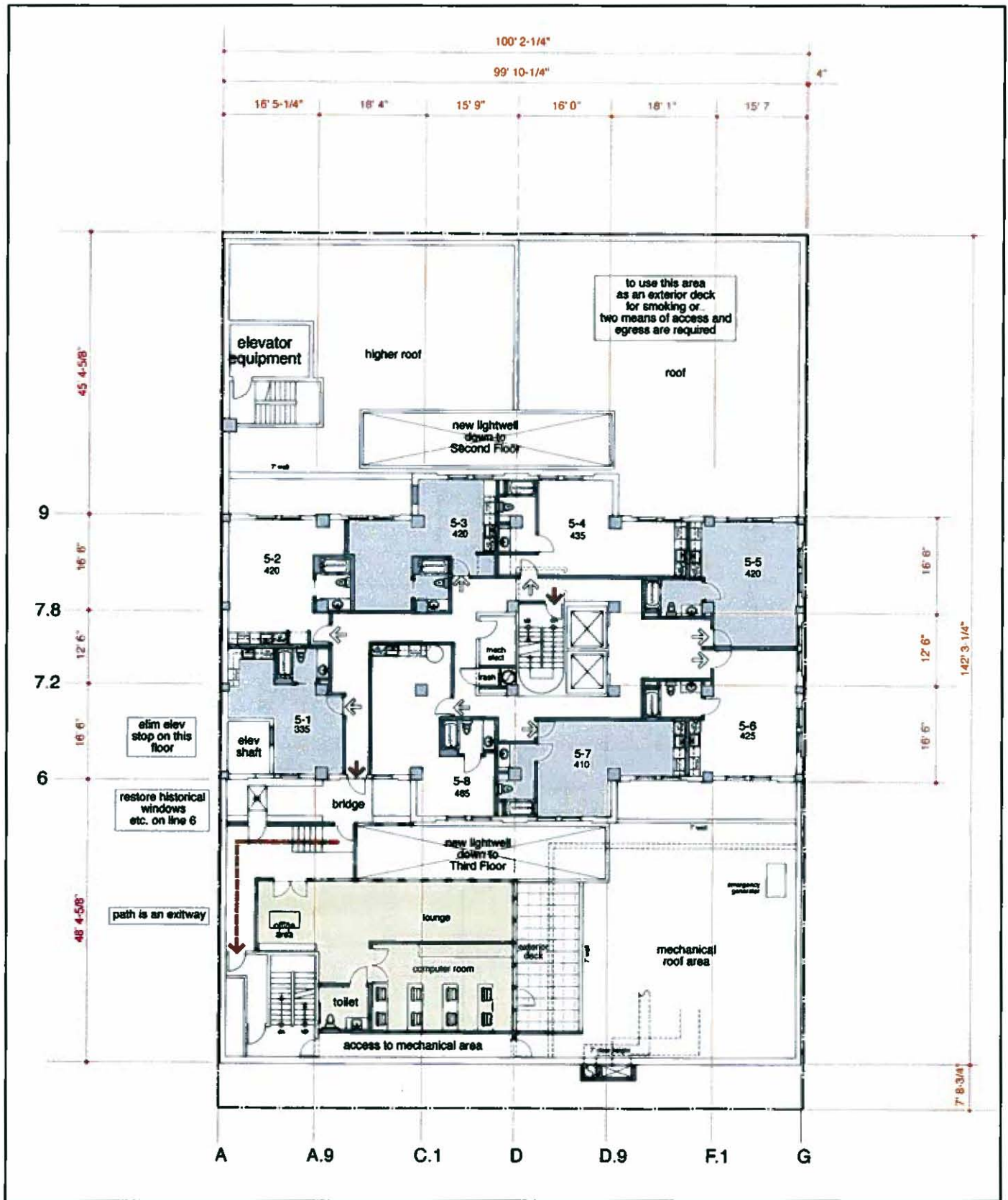
Source: Architects Richard Bundy & David Thompson 2010



Connections Housing
CCDC Secondary Study

Figure 8
Fourth Floor Plan

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Source: Architects Richard Bundy & David Thompson 2010

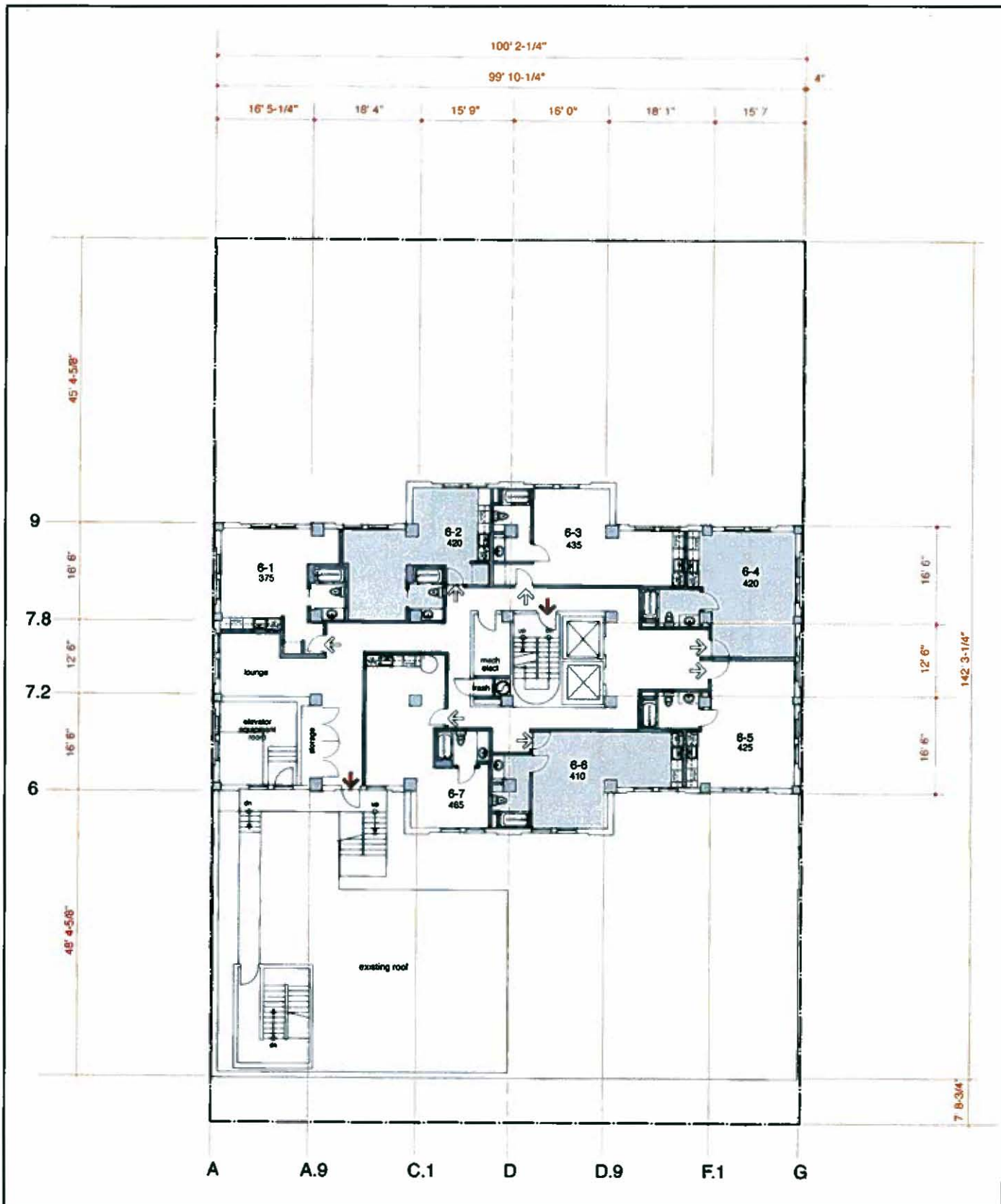


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Connections Housing
CCDC Secondary Study

Figure 9
Fifth Floor Plan

January 2011

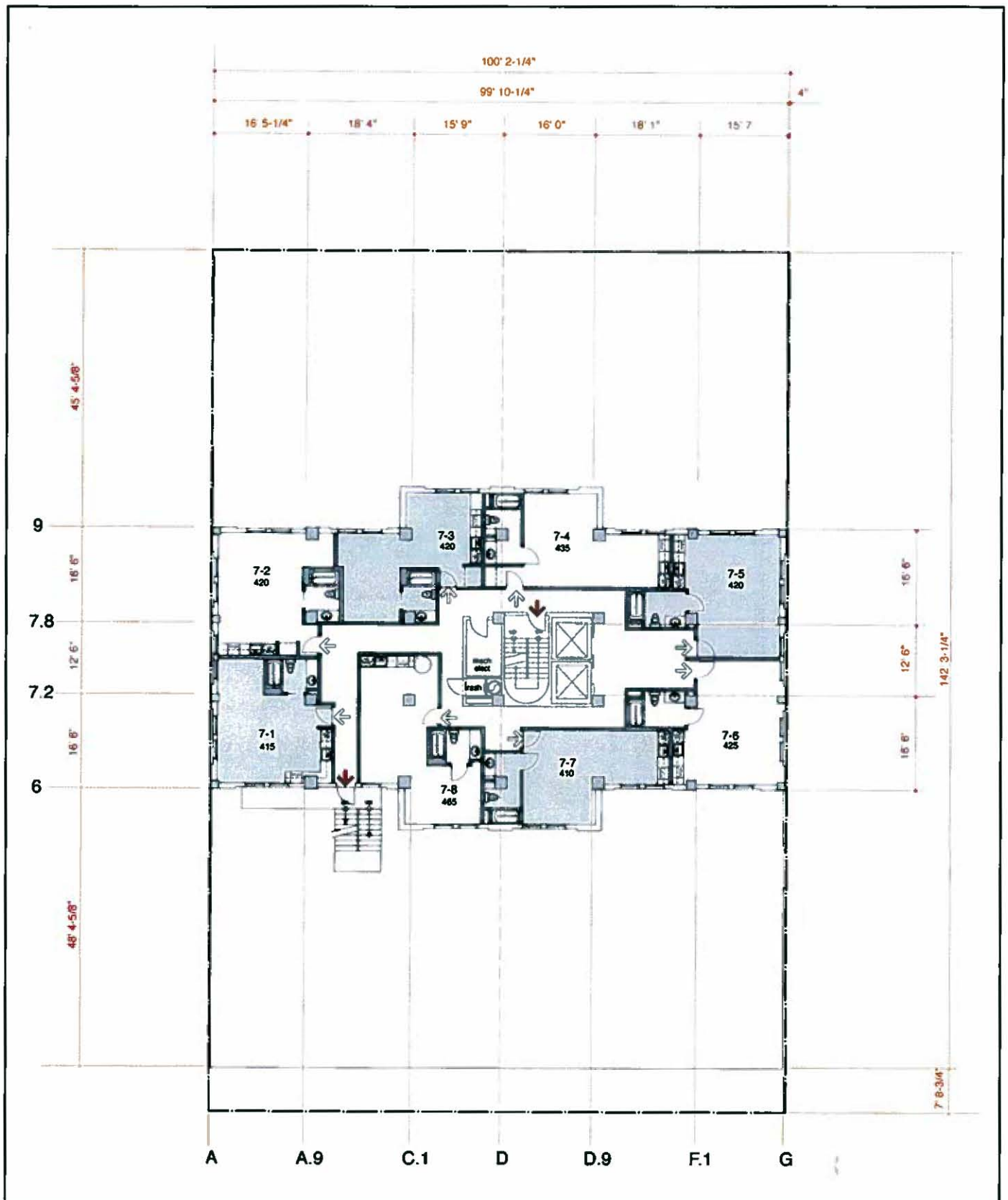


Source: Architects Richard Bundy & David Thompson 2010

Figure 10
Sixth Floor Plan



No Scale

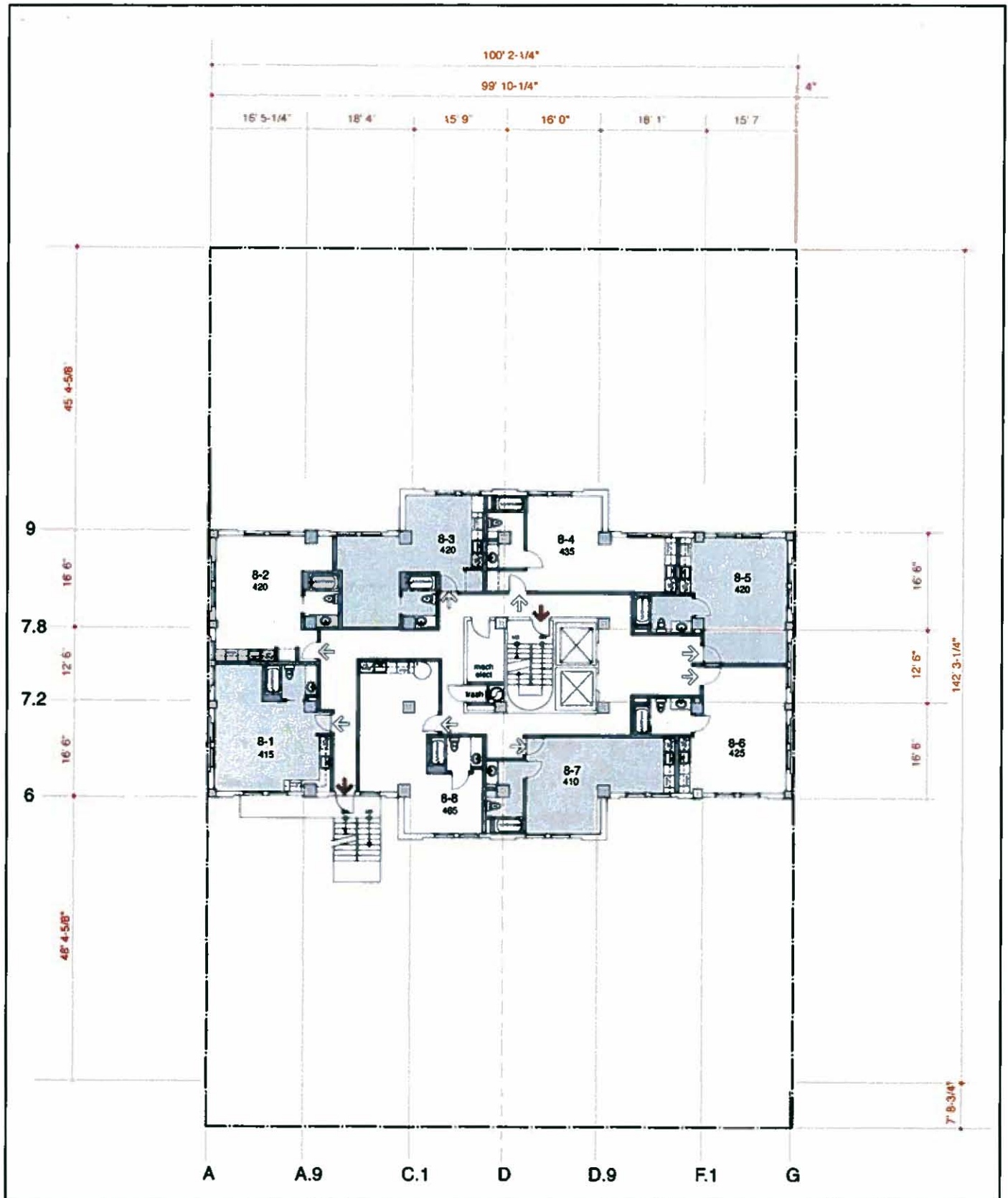


Source: Architects Richard Bundy & David Thompson 2010


 No Scale
 Connections Housing
 CCDC Secondary Study

Figure 11
Seventh Floor Plan

January 2011



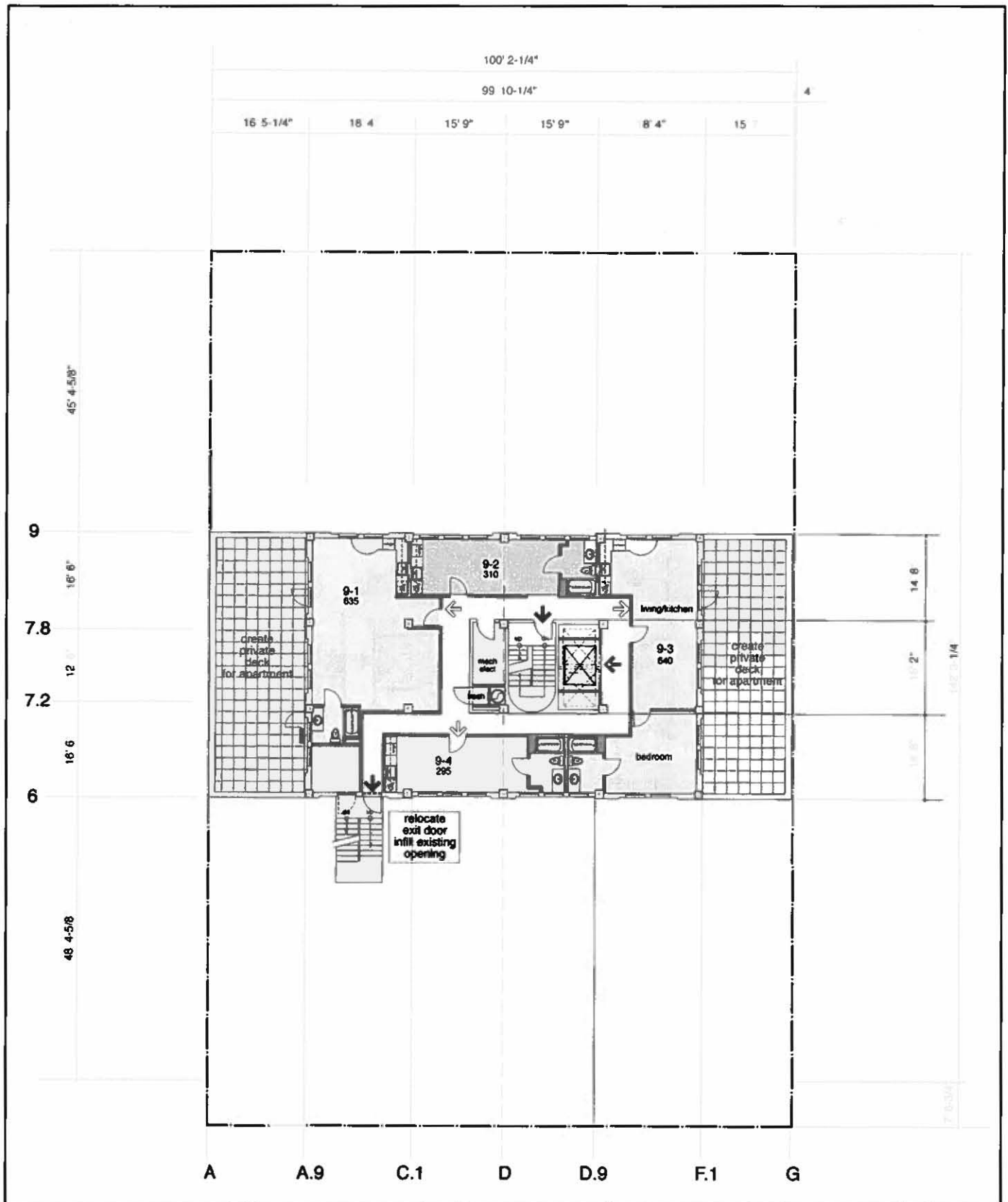
Source: Architects Richard Bundy & David Thompson 2010



Connections Housing
CCDC Secondary Study

Figure 12
Eighth Floor Plan

January 2011



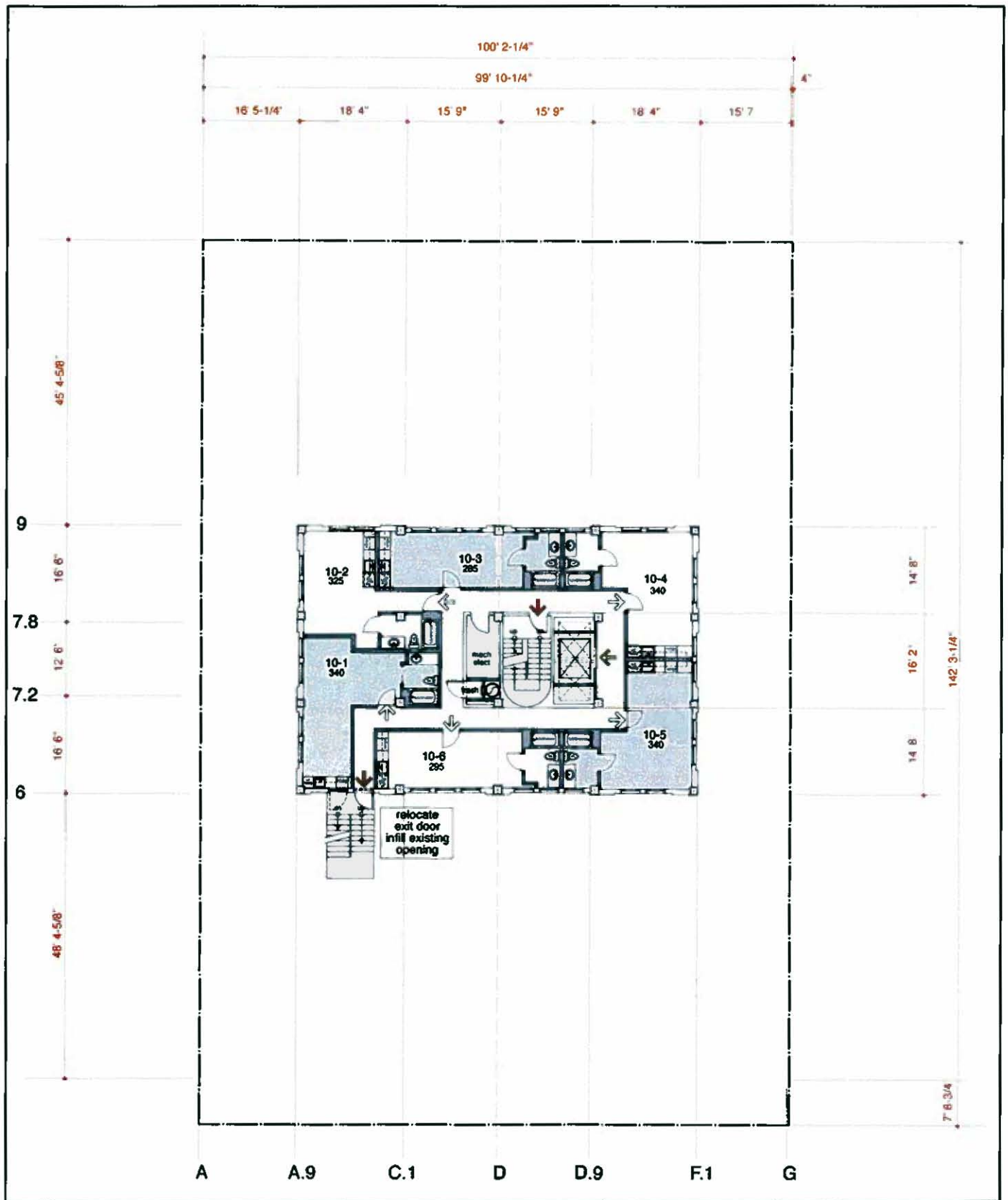
Source: Architects Richard Bundy & David Thompson 2010



Connections Housing
CCDC Secondary Study

Figure 13
Ninth Floor Plan

January 2011



Source: Architects Richard Bundy & David Thompson 2010

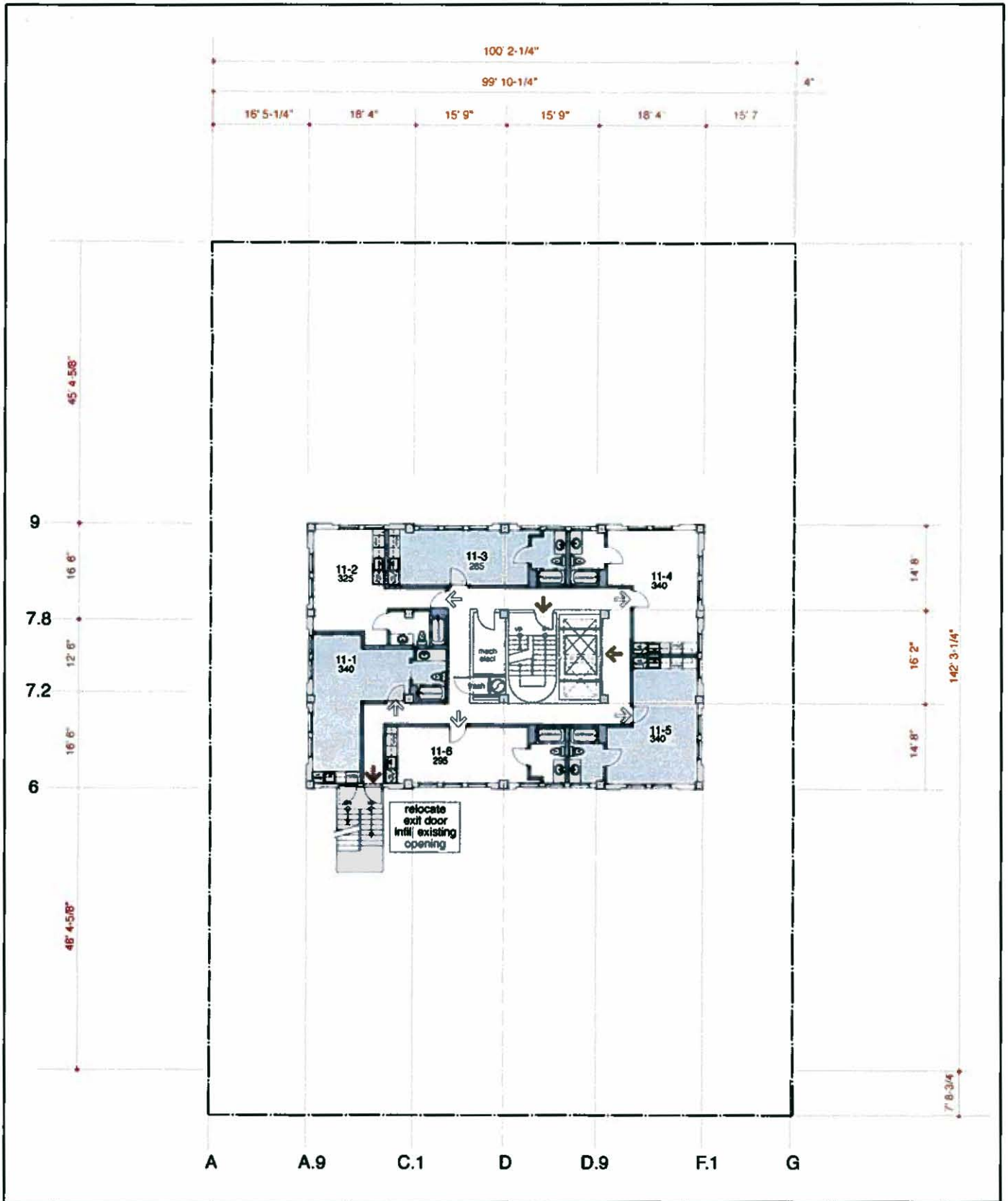


No Scale

Connections Housing
CCDC Secondary Study

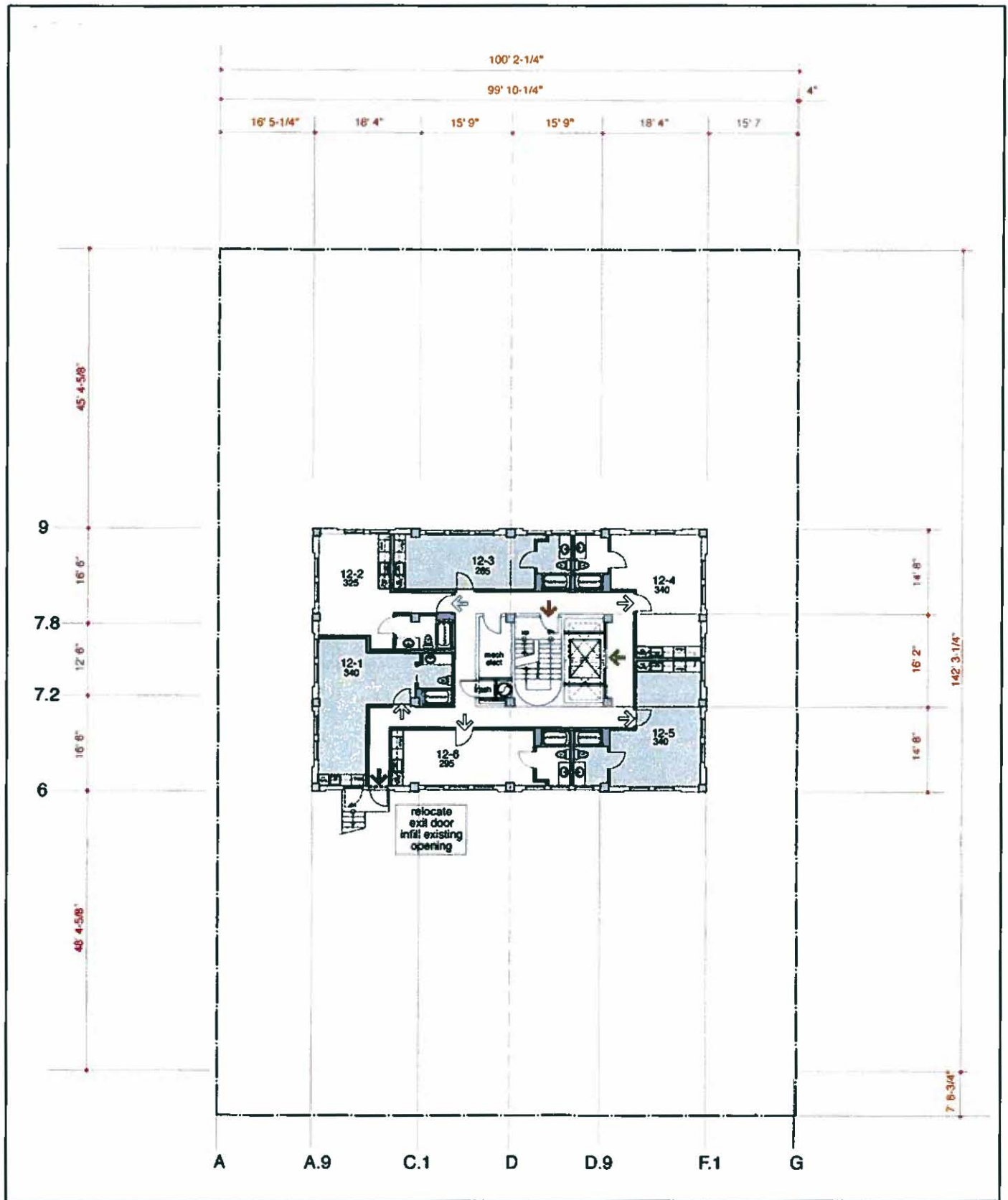
Figure 14
Tenth Floor Plan

January 2011



Source: Architects Richard Bundy & David Thompson 2010

Figure 15
Eleventh Floor Plan



Source: Architects Richard Bundy & David Thompson 2010



Connections Housing
CCDC Secondary Study

Figure 16
Twelfth Floor Plan

January 2011

6. CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) COMPLIANCE: The Centre City Redevelopment Project and related activities have been addressed by the following environmental documents, which were prepared prior to this Secondary Study and are hereby incorporated by reference:

Final Environmental Impact Report (FEIR) for the San Diego Downtown Community Plan, Centre City Planned District Ordinance, and 10th Amendment to the Redevelopment Plan for the Centre City Project (State Clearinghouse Number 2003041001, certified by the Redevelopment Agency (Resolution No. R-04001) and the City Council (Resolution No. R 301265) on March 14, 2006.

Addendum to the FEIR for the 11th Amendment to the Redevelopment Plan for the Centre City Redevelopment Project, Amendments to the San Diego Downtown Community Plan, Centre City Planned District Ordinance, Marina Planned District Ordinance, and Mitigation, Monitoring and Reporting Program of the FEIR for the San Diego Downtown Community Plan, Centre City Planned District Ordinance, and the Redevelopment Plan for the Centre City Redevelopment Project certified by the Redevelopment Agency by Resolution R-04193 and by the City Council by R-302932, with date of final passage on August 3, 2007.

Second Addendum to the FEIR for the proposed amendments to the San Diego Downtown Community Plan, Centre City Planned District Ordinance, Marina Planned District Ordinance, and Mitigation Monitoring and Reporting Program certified by the Redevelopment Agency by Resolution R-04508 302932, with date of final passage on April 21, 2010.

Third Addendum to the FEIR for the Residential Emphasis District Amendments to the Centre City Planned District Ordinance certified by the Redevelopment Agency by Resolution R-04510 with date of final passage on April 21, 2010.

Fourth Addendum to the FEIR for the San Diego Civic Center Complex Project certified by the Redevelopment Agency by Resolution R-04544 with date of final passage on August 3, 2010.

The FEIR is a "Program EIR" as described in Section 15168 of the State CEQA Guidelines. The aforementioned environmental documents are the most recent and comprehensive environmental documents pertaining to the proposed project. These environmental documents are available for review at the office of the Centre City Development Corporation, 401 B Street, Suite 400, San Diego, California 92101.

This Secondary Study was prepared in compliance with the San Diego Redevelopment Agency's amended "Procedures for Implementation of CEQA and the State CEQA Guidelines" (adopted July 17, 1990) (Agency Guidelines). Under these Agency Guidelines, environmental review for subsequent specific development projects is accomplished using the Secondary Study process defined in the Agency Guidelines, as allowed by Sections 15168 and 15180 of the State CEQA Guidelines. The Secondary Study includes the same evaluation criteria as the Initial Study defined in Section 15063 of the State CEQA Guidelines. Under this process, the Secondary Study is prepared for each subsequent specific development project to determine whether the potential impacts were anticipated in the FEIR. No additional documentation is required for subsequent specific development projects if the Secondary Study determines that the potential impacts have been adequately addressed in the FEIR and subsequent specific development projects implement appropriate mitigation measures identified in the Mitigation, Monitoring, and Reporting Program (MMRP) that accompanies the FEIR.

If the Secondary Study identifies new impacts or a substantial change in circumstances, additional environmental documentation is required. The form of this documentation depends on the impacts of the subsequent 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 FEIR, (b) there is a substantial change in circumstances that would require major revision to the FEIR, or (c) 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 or Supplement to the EIR would be prepared in accordance with Sections 15162 or 15163 of the State 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 FEIR, and no new environmental document is required.

7. PROJECT-SPECIFIC ENVIRONMENTAL ANALYSIS: See attached Environmental Checklist and *Section 10 Evaluation of Environmental Impacts*.

8. MITIGATION, MONITORING, AND REPORTING PROGRAM (MMRP): As described in the Environmental Checklist and summarized in **Attachment A**, the following mitigation measures included in the MMRP found in Volume 1B of the FEIR will be implemented by the proposed project:

- Air Quality (AQ-B.1-1)
- Historical Resources (HIST-A-1.2)
- Noise (NOI-B.1-1)

9. DETERMINATION:

In accordance with Sections 15168 and 15180 of the CEQA Guidelines, the potential impacts associated with future development within the Downtown Community Plan are addressed in the FEIR prepared for the San Diego Downtown Community Plan, Centre City Planned District Ordinance, and Tenth Amendment to the Redevelopment Plan for the Centre City Redevelopment Project, which was certified on March 14, 2006, and the Addenda certified thereafter in 2007 and 2010.

These previous documents address the potential effects of future development within the Downtown Community Plan 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 FEIR and Addenda concluded that development would result in significant impacts related to the following issues (mitigation and type of impact shown in parentheses):

Significant but Mitigated Impacts

- Air Quality: Construction Emissions (AQ-B.1) (Direct [D])
- Land Use: Ballpark Noise (LU-B.1) (D)
- Land Use: Ballpark Lighting (LU-B.5) (D)
- Noise: Interior From Traffic Noise (NOI-B.1) (D)
- Noise: Interior From Ballpark Noise (NOI-B.2) (D)
- Paleontology: Impacts to Significant Paleontological Resources (PAL-A.1) (D)

Significant and Not Mitigated Impacts

- Aesthetics/Visual Quality: Views Of Bay And Bay Bridge (VIS-B.1) (D)
- Air Quality: Construction Emissions (AQ-B.1) (Cumulative [C])

- Air Quality: Mobile-Source Emissions (C)
- Historical Resources: Historical (D/C)
- Historical Resources: Archaeological (D/C)
- Land Use: Traffic Noise (LU-B.2) (D)
- Land Use: Aircraft Noise (LU-B.3) (D)
- Land Use: Railroad Noise (LU-B.4) (D)
- Land Use: Physical Changes Related to Transient Activity (LU-B.6) (D/C)
- Noise: Traffic Noise Level Increase on Grid Streets (NOI-A.1) (D/C)
- Noise: Exterior Traffic Noise in Residential Development (NOI-C.1) (D)
- Noise: Exterior Aircraft Noise in Residential Development (NOI-C.2) (D)
- Noise: Exterior Traffic Noise in Public Parks and Plazas (NOI-D.1) (D)
- Noise: Exterior Aircraft Noise in Public Parks and Plazas (NOI-D.2) (D)
- Parking: Excessive Parking Demand (TRF-D.1) (D/C)
- Traffic: Impact on Grid Streets (TRF-A.1.1) (D)
- Traffic: Impact on Surrounding Streets (TRF-A.1.2) (D/C)
- Traffic: Impact on Freeway Ramps and Segments (TRF-A.2.1) (D/C)
- Traffic: Impact from Removal of Cedar Street Ramp (TRF-A.2.2) (D)
- Water Quality: Urban Runoff (WQ-A.1) (C)

In certifying the FEIR and approving the Downtown Community Plan, Planned District Ordinance, and 10th Amendment to the Redevelopment Plan, the San Diego City Council and the Redevelopment Agency 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

- Develop downtown as the primary urban center for the region
- Maximize employment opportunities within the downtown area
- Develop full-service, walkable neighborhoods linked to the assets downtown offers
- Increase and improve parks and public spaces
- Maximize the advantages of downtown’s climate and waterfront setting
- Implement a coordinated, efficient system of vehicular, transit, bicycle, and pedestrian traffic
- Integrate historical resources into the new downtown plan
- Facilitate and improve the development of business and economic opportunities located in the downtown area
- Integrate health and human services into neighborhoods within downtown
- Encourage a regular process of review to ensure that the Plan and related activities are best meeting the vision and goals of the Plan

The proposed activity analyzed within this Secondary Study is covered under the FEIR for the San Diego Downtown Community Plan, Centre City Planned District Ordinance 1992, and 10th Amendment to the Redevelopment Plan for the Centre City Redevelopment Project, which was certified by the Redevelopment Agency by Resolution R-04001 and by the City Council by Resolution R-301265 on March 14, 2006, and the Addenda certified thereafter in 2007 and 2010.

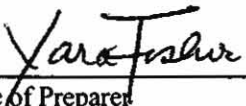
This activity is adequately addressed in the environmental documents noted above, and the Secondary Study prepared for this project reveals that there is no change in circumstance, additional information, or project changes to warrant additional environmental review. Because the prior environmental

documents 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).

SUMMARY OF FINDINGS: In accordance with Public Resources Code sections 21166 and 21083.3, and CEQA Guidelines sections 15162(a), 15168, and 15183, the following findings are derived from the environmental review documented by this Secondary Study and the 2006 FEIR.

1. No substantial changes are proposed in the Centre City Redevelopment Project, or with respect to the circumstances under which the Centre City Redevelopment Project is to be undertaken as a result of the development of the proposed project, which will require important or major revisions in the 2006 FEIR or Addenda certified thereafter in 2007 and 2010 for the Centre City Redevelopment Project.
2. No new information of substantial importance to the Centre City Redevelopment Project has become available, which was not known or could not have been known at the time the 2006 FEIR for the Centre City Redevelopment Project was certified as complete, and which shows that the Centre City Redevelopment Project will have any significant effects not discussed previously in the 2006 FEIR or Addenda certified thereafter in 2007 and 2010, or that any significant effects previously examined will be substantially more severe than shown in the 2006 FEIR or Addenda certified thereafter in 2007 and 2010, 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 of the project on the environment.
3. No Negative Declaration, Subsequent EIR, or Supplement or Addendum to the 2006 FEIR is necessary or required.
4. The development of the site will have no significant effect on the environment, except as identified and considered in the 2006 FEIR and Addenda certified thereafter in 2007 and 2010 for the Centre City Redevelopment Project. No new or additional project-specific mitigation measures are required for this project.
5. The proposed project and its associated activities would not have any new effects that were not adequately covered in the 2006 FEIR or Addenda certified thereafter in 2007 and 2010; therefore, the proposed project is within the scope of the program approved under 2006 FEIR and Addenda certified thereafter in 2007 and 2010.

The Centre City Development Corporation (CCDC), the implementing body for the Redevelopment Agency of the City of San Diego, administered the preparation of this Secondary Study.

_____	January 6, 2011
Signature of Lead Agency Representative	Date
	January 3, 2011
_____	Date
Signature of Preparer	

ENVIRONMENTAL CHECKLIST

10. EVALUATION OF ENVIRONMENTAL IMPACTS

This environmental checklist evaluates the potential environmental effects of the proposed project consistent with the significance thresholds and analysis methods contained in the FEIR for the San Diego Downtown Community Plan and Addenda certified thereafter in 2007 and 2010, Centre City PDO, and Redevelopment Plan for the Centre City Project Area.

In addition, this environmental checklist also recognizes the requirements of Assembly Bill (AB) 32 and Senate Bill (SB) 97. AB 32, the California Global Warming Solutions Act, established a state goal of reducing greenhouse gas (GHG) emissions to 1990 levels by the year 2020 (a reduction of approximately 30 percent from forecast emission levels). SB 97, a companion bill, directed the California Natural Resources Agency (Resources Agency) to certify and adopt guidelines for the mitigation of GHG or the effects of GHG emissions. SB 97 was the State Legislature's directive to the Resources Agency to specifically establish that GHG emissions and their impacts are appropriate subjects for CEQA analysis.

On December 30, 2009, the Resources Agency adopted revisions to the State CEQA Guidelines (Title 14, California Administrative Code Section 15000 et. seq.) to address analysis and mitigation pursuant to SB 97. These amendments became effective March 18, 2010. CEQA now requires that public agencies review the environmental impacts of proposed projects. As such, this review includes an analysis of GHG emissions for the proposed project.

Based on the assumption that the proposed activity is adequately addressed in the FEIR and the Addenda to the FEIR, the environmental checklist table indicates how the impacts of the proposed activity relate to the conclusions of the FEIR and the Addenda to the FEIR. 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 identifies each potential environmental effect and provides information supporting the conclusion drawn as to the degree of impact associated with the proposed project. As applicable, mitigation measures from the FEIR are identified and are summarized in Attachment A to this Secondary Study. Some of the mitigation measures are plan-wide and not within the control of the proposed project. Other measures, however, are to be specifically implemented by the proposed project. Consistent with the FEIR analysis, the following issue areas have been identified as SNM even with inclusion of the proposed mitigation measures, where feasible:

- Traffic: Impact on Surrounding Streets (TRF-A.1.2) (C)
- Traffic: Impact on Freeway Ramps and Segments (TRF-A.2.1) (C)

The following Overriding Considerations apply to the proposed project:

- Integrate historical resources into the new downtown plan.
- Integrate health and human services into neighborhoods within downtown.

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)
1. AESTHETICS/VISUAL QUALITY:						
(a) Substantially disturb a scenic resource, vista, or view from a public viewing area, including a State scenic highway or view corridor designated by the Community Plan? The proposed project would involve the restoration and rehabilitation of an existing historically designated building located on Sixth Avenue. The proposed project would not alter the height of the building or introduce new elements into the viewshed. Therefore, the proposed project would not disturb or change current views of scenic resources such as San Diego Bay, San Diego-Coronado Bay Bridge, Point Loma, Coronado, or the downtown skyline that are afforded by public viewing areas within and around downtown and along view corridor streets within the downtown planning area. The proposed project also would not disturb any views of a state scenic highway or view corridor designated by the Downtown Community Plan. As such, no direct or cumulative impacts associated with this issue would occur.					X	X
(b) Substantially incompatible with the bulk, scale, color and/or design of surrounding development? Since the proposed project would involve the restoration and rehabilitation of an existing historically designated building, the current bulk, scale, and footprint of the building would not be altered. However, it should be noted that the building exterior has deteriorated over the years. While it retains its overall form and much of its historic detailing, some important, high-profile historic fabric was lost or altered during renovation in the 1960s, including the exterior paint color. With this project, this					X	X

	Significant and Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
detail would be restored to match the original historic condition consistent with the Secretary of the Interior Standards for Rehabilitation and City of San Diego Chapter 14, Article 3, Division 2 (Historical Resources Regulations). Restoration of this building would improve the current aesthetic condition of the site and would complement existing surrounding land uses. Since the proposed project would not introduce additional height or building features, it would be considered compatible with the bulk, scale, color, and design of the surrounding existing and planned development. Therefore, no significant direct or cumulative impacts associated with this issue would occur.						
(c) Substantially affect daytime or nighttime views in the area due to lighting? The proposed project would not require a substantial amount of exterior lighting or introduce materials that would generate substantial glare through the restoration of the existing building. Furthermore, the City's Light Pollution Law (Municipal Code Section 101.1300 et seq.) protects nighttime views (e.g., astronomical activities) and light-sensitive land uses from excessive light generated by development in the downtown planning area. The proposed project's conformance to this requirement would ensure that direct and cumulative impacts associated with this issue are not significant.					X	X
2. AGRICULTURAL RESOURCES						
(a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) to non-agricultural use? The downtown planning area is an urban environment that does not contain land designated as prime agricultural soils by the Soils Conservation Service, nor does it contain prime farmlands					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)
designated by the California Department of Conservation. Therefore, no direct or cumulative impacts to agricultural resources would occur.						
(b) Conflict with existing zoning for agricultural use, or a Williamson Act contract? The proposed project is located on a site that does not contain, nor is it near, land zoned for agricultural use or land subject to a Williamson Act contract pursuant to Section 51201 of the California Government Code. Therefore, no direct or cumulative impacts resulting from conflicts with existing zoning for agricultural use or a Williamson Act contract would occur.					X	X
3. AIR QUALITY						
(a) Conflict with or obstruct implementation of an applicable air quality plan, including the County's Regional Air Quality Strategies or the State Implementation Plan? The proposed project, and the entire downtown planning area, is located within the San Diego Air Basin, which is under the jurisdiction of the San Diego Air Pollution Control District (SDAPCD). The San Diego Air Basin is designated by state and federal air quality standards as nonattainment for ozone and particulate matter (PM) less than 10 microns (PM ₁₀) and less than 2.5 microns (PM _{2.5}) in equivalent diameter. The SDAPCD has developed a Regional Air Quality Strategy (RAQS) to achieve the state air quality standards for ozone. According to the FEIR, development consistent with the Downtown Community Plan would not conflict with regional air quality planning, and would be consistent with the RAQS. While the proposed project would allow for a different use of the building other than its current use, it would not result in a conflict with, or obstruct the implementation of, applicable air quality plans. No direct or cumulative impacts					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)
relative to the obstruction of air quality attainment plans would occur with implementation of the proposed project.						
<p>(b) Expose sensitive receptors to substantial air contaminants including, but not limited to, criteria pollutants, smoke, soot, grime, toxic fumes and substances, particulate matter, or any other emissions that may endanger human health? Sensitive receptors could be exposed to substantial air contaminants through three main air emissions generators: construction-related, mobile source, and stationary source.</p> <p>During restoration of the existing building, the proposed project could involve activities that could result in the exposure of surrounding sensitive receptors to substantial air contaminants associated with the use of construction equipment and the generation of dust. The potential for impacts to surrounding sensitive receptors during construction activities would be mitigated to below a level of significance through compliance with the City's mandatory standard dust control measures and the dust control and construction equipment emission-reduction measures required by FEIR Mitigation Measure AQ-B.1-1 (see Table A).</p> <p>The long-term operation of the proposed project would not result in significant mobile or stationary source emissions. Mobile source emissions are primarily generated by automobile use. As discussed in Section 16(a) of this Secondary Study, the proposed project is anticipated to result in a net reduction of Average Daily Trips (ADT) compared to existing conditions. With respect to stationary source emissions, the only notable source related to the</p>			X		X	

	Significant and Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
<p>proposed project would occur with respect to reactive organic gas (ROG) emissions. ROG-producing products include personal care products (i.e., hair sprays and deodorants, household cleaning products, and landscape maintenance equipment). Given the nature and uses of the proposed project, it is not likely that these emissions generators would expose sensitive receptors to substantial air contaminants. Furthermore, the FEIR concludes that development within the downtown planning area would not expose sensitive receptors to significant levels of any of the substantial air contaminants discussed above. The project would not expose sensitive receptors to a level of air contaminants beyond the level assumed by the FEIR. Additionally, the project is not located near any industrial activities and, therefore, would not be impacted by any emissions associated with such activities. Therefore, direct impacts associated with project implementation are potentially significant but mitigated below a level of significance, while cumulative impacts would be considered not significant. Project impacts associated with the generation of substantial air contaminants are discussed below in 3(c).</p>						
<p>(c) Generate substantial air contaminants including, but not limited to, criteria pollutants, smoke, soot, grime, toxic fumes and substances, PM, or any other emissions that may endanger human health? Generation of substantial air contaminants could occur through the following three main air emission generators: construction activities, mobile sources, and stationary sources.</p> <p>Construction-related activities associated with preparation of the site and restoration of the</p>			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)
<p>existing building would involve potentially adverse impacts associated with hazardous building materials, the creation of dust, and the generation of emissions from construction equipment. Compliance with the City's existing regulations requiring a preconstruction hazards assessment and strict remediation measures if harmful materials are present would ensure that air quality impacts associated with hazardous building materials are not significant. Implementation of FEIR Mitigation Measure AQ-B.1-1 (see Table A) would reduce dust and construction equipment emissions generated during construction of the proposed project to below a level of significance. As discussed in Section 3(b) above, long-term operation of the proposed project would not result in significant generation of mobile or stationary source emissions. Therefore, direct impacts associated with project implementation are potentially significant but mitigated below a level of significance, while cumulative impacts would be considered not significant.</p>						
4. BIOLOGICAL RESOURCES						
<p>(a) Substantially effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive or special status species in local or regional plans, policies, or regulations, or by local, state, or federal agencies? Due to the highly urbanized nature of the downtown planning area, there are no sensitive plants or animal species, habitats, or wildlife migration corridors within the area, including the proposed project site. Therefore, no direct or cumulative impacts associated with this issue would occur.</p>					X	X
<p>(b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional</p>					X	X

	Significant and Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
<p>plans, policies, and regulations by local, state, or federal agencies? As identified in the FEIR, the downtown planning area is not within a subregion of the San Diego County Multiple Species Conservation Program (MSCP). In addition, the proposed project will comply with the provisions of the Migratory Bird Treaty Act regarding nesting birds, nests, and fledglings, as applicable. Furthermore, the proposed project will comply with any applicable local, regional, state, and federal plans, policies, and regulations protecting riparian habitat or other sensitive natural communities. Therefore, impacts associated with substantial adverse effects on riparian habitat or other sensitive natural communities identified in local or regional plans, policies, and regulations by local, state, or federal agencies would not occur.</p>						
5. HISTORICAL RESOURCES						
<p>(a) Substantially impact a significant historical resource, as defined in § 15064.5? The proposed project involves the restoration and rehabilitation of the World Trade Center (formerly known as the San Diego Athletic Club, constructed in 1928) consistent with the Secretary of the Interior Standards for Rehabilitation and City of San Diego Chapter 14, Article 3, Division 2 (Historical Resources Regulations). This building is a locally designated historical building listed as HRB Site #685. The proposed project would result in a change in use for the historic building from office to residential. Although the building does not currently have a residential occupancy, historical data indicates that the original San Diego Athletic Club use included 96 sleeping rooms on the upper floors. The proposed project would, therefore, partially re-establish a historic</p>			X			X

	Significant and Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
<p>use.</p> <p>According to the building assessment prepared by Heritage Architecture and Planning, the building's interior finishes were significantly altered during conversion of the building from the San Diego Athletic Club to office space in the late 1960s, and the original character of the interior is no longer evident and cannot be identified. The majority of the historic detailing and cast-stone ornamentation on the building's exterior are still extant. Most of the roofing is in poor condition, beyond its life expectancy, and is in need of replacement. Voluntary seismic upgrades are anticipated as part of the proposed renovation.</p> <p>The Downtown Community Plan seeks to preserve and protect historical resources, and the FEIR requires mitigation where a historical site or district would be impacted. Because the building has historical and architectural significance at the local level, the building improvements associated with the proposed project would be subject to the requirements set forth in FEIR Mitigation Measure HIST-A.1-2. In addition, the proposed project must also comply with the Secretary of the Interior's Standards and Guidelines for the Preservation, Rehabilitation, Restoration, and Reconstruction of Historic Buildings to ensure that direct impacts to the historical resource would be mitigated to a level less than significant. In addition, the restoration and rehabilitation activities would only occur to the existing building and would not impact other potentially historic resources nearby. Therefore, no indirect or cumulative impacts associated with this issue</p>						

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)
would occur.						
(b) Substantially impact a significant archaeological resource pursuant to § 15064.5, including the disturbance of human remains interred outside of formal cemeteries? According to the conclusions in the FEIR, the likelihood of encountering archaeological resources is greatest for projects that include grading and/or excavation of areas on which past grading and/or excavation activities have been minimal (e.g., surface parking lots). The proposed project would involve the restoration and rehabilitation of the existing historic building, which has been previously excavated. The proposed project would not include components that would require additional subsurface excavation or grading activities. As stated in the FEIR, previously excavated areas are generally considered to have a low potential for archaeological resources, since the soil containing the archaeological resources has been removed. Since the site has been previously developed and the building is not expanding in size, it is not anticipated that the proposed project would result in significant direct or cumulative impacts to archaeological resources.					X	X
(c) Substantially impact a unique paleontological resource or site or unique geologic feature? The proposed project site is underlain by the San Diego Formation and Bay Point Formation, which have high paleontological resource potentials. However, the project site has been previously excavated and developed. The proposed project would not include components that would require additional subsurface excavation or grading activities. Therefore, no direct or cumulative impacts associated with this issue would occur.					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)
6. GEOLOGY AND SOILS						
<p>(a) Substantial health and safety risk associated with seismic or geologic hazards? The proposed project is located in a seismically active region and lies within the City of San Diego's Special Study Zone as defined by the City's Seismic Safety Study. The Rose Canyon Fault Zone traverses the downtown planning area and contains two recognized areas of active faulting: the Downtown Graben and the San Diego Fault. In addition, the site is located on the Baypoint Formation and, although the potential for geologic hazards (landslides, liquefaction, slope failure, and seismically induced settlement) is considered low due to the site's moderate to low expansive geologic structure, such hazards could nevertheless occur. Therefore, the potential exists for substantial health and safety risks associated with a seismic hazard.</p> <p>The proposed project would rehabilitate the existing historic building on-site and would also include voluntary seismic upgrades to the structure. The building improvements would be required to implement and to be in conformance with all seismic-safety development requirements, including City requirements for the Downtown Special Fault Zone and the seismic design requirements of the Uniform Building Code. The City of San Diego Notification of Geologic Hazard procedures would ensure that the potential direct impacts associated with seismic and geologic hazards are not significant. Cumulative impacts associated with this issue would not occur.</p>					X	X
7. GREENHOUSE GAS EMISSIONS						

	Significant and Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
<p>(a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? CCDC has not adopted a recommended methodology for evaluating GHG emissions associated with new development. CCDC recommends that the City of San Diego's guidance memo titled Addressing Greenhouse Gas Emissions from Projects Subject to CEQA (Guidance) be used for analyzing the proposed project's impacts from GHG emissions (City 2010).</p> <p>The City of San Diego (City) does not currently have adopted thresholds of significance for GHG emissions. The City is using the California Air Pollution Control Officers Association (CAPCOA) report, CEQA & Climate Change, dated January 2008, as an interim threshold to determine whether a GHG analysis will be required. A 900 metric ton screening threshold for determining when a GHG analysis is required was chosen based on available guidance from the CAPCOA white paper. The CAPCOA report references the 900 metric ton guideline as a conservative threshold for requiring further analysis and mitigation. This emission level is based on the amount of vehicle trips, the typical energy and water use, and other factors associated with projects. CAPCOA identifies project types that are estimated to emit approximately 900 metric tons of GHGs annually.</p> <p>The proposed project is greater than the project sizes listed in the guidance memo, and, therefore, requires an analysis to show that the project is below the 900 metric ton screening criteria. The analysis should include, at a minimum, the five primary sources of GHG emissions: vehicular</p>					X	X

	Significant and Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
<p>Issues and Supporting Information</p> <p>traffic, generation of electricity, natural gas consumption/combustion, solid waste generation, and water usage.</p> <p>The proposed project's direct and indirect GHG emissions from the above-mentioned sectors were estimated according to the recommended methodologies from the California Air Resources Board (ARB) and the California Climate Action Registry (CCAR). Direct sources include emissions such as vehicle trips and on-site natural gas consumption. Indirect sources include off-site emissions occurring as a result of the project's operations such as electricity and water consumption. Direct emissions associated with mobile sources were estimated using URBEMIS (Rimpo and Associates 2008). Modeling was based on project-specific data (e.g., size and type of proposed uses) and vehicle trip information from the City's Trip Generation Manual (City 2003). Consumption and generation data for electricity, natural gas, water, and solid waste for the proposed uses were estimated based on current regional or state estimates of commercial and residential consumption rates.</p> <p>Energy consumption rates, including office, medical, and residential electricity, and natural gas use were obtained from the California Energy Commission's (CEC) California Commercial End Use Survey (CEC 2006). GHG emission factors associated with energy consumption were obtained from San Diego Gas & Electric's (SDG&E's) 2008 Annual Entity Emissions report to CCAR and the CCAR General Reporting Protocol Version 3.1 (CCAR 2009).</p> <p>Estimates of water consumption, as gallons per</p>						

	Significant and Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
<p>resident or square foot of work space, were obtained from the CEC California Energy–Water Relationship Staff Report (CEC 2007a). GHG emissions associated with the consumption of water were calculated based on the estimated level of electricity required to convey, treat, and distribute the project’s estimated water usage and the aforementioned emission factors for electricity production. Electricity consumption associated with water consumption was estimated using an electricity consumption rate from the CEC’s Refining Estimates of Water-Related Energy Use in California report (CEC 2007b).</p> <p>Solid waste generation rates were estimated using CalRecycle waste generation rates for commercial and medical uses, and the Environmental Protection Agency’s (EPA’s) Municipal Solid Waste in the United States: 2007 Facts and Figures (EPA 2008). GHG emissions from solid waste disposal were calculated using CalRecycle waste generation and characterization data, and emission factors contained in EPA’s Waste Reduction Model (WARM).</p> <p>It is important to note that all carbon dioxide (CO₂) emissions from project operation may not necessarily be considered “new” emissions. Per information provided by CCDC, the project site is estimated to be 90 percent occupied by office space, and, therefore, existing GHG emissions are calculated according to the same methodology described above. The current, proposed, and net increase in GHG emissions from implementation of the proposed project are reported in Table I, below. As described above, the proposed project’s GHG emissions would require further analysis and mitigation if the net increase in GHG</p>						

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)																																
<p>emissions is greater than 900 metric tons per year. Refer to Attachment B for a detailed summary of the modeling assumptions, inputs, and outputs.</p> <p>Table 1. Summary of Modeled Greenhouse Gas Emissions (CO₂e) from Existing and Proposed Sources</p> <table border="1"> <thead> <tr> <th>Source</th> <th>Existing CO₂e Emissions¹</th> <th>CO₂e Emissions from the Proposed Project</th> <th>Net CO₂e Emissions (Proposed – Existing)</th> </tr> </thead> <tbody> <tr> <td colspan="4">Operational Emissions at Full Buildout (Year 2011) (metric tons/year)</td> </tr> <tr> <td>Mobile Sources</td> <td>2,476</td> <td>1,797</td> <td>-679</td> </tr> <tr> <td>Electricity Consumption</td> <td>627</td> <td>567</td> <td>-60</td> </tr> <tr> <td>Natural Gas Consumption</td> <td>123</td> <td>252</td> <td>129</td> </tr> <tr> <td>Water Consumption</td> <td>16</td> <td>31</td> <td>15</td> </tr> <tr> <td>Solid Waste Generation</td> <td>50</td> <td>161</td> <td>111</td> </tr> <tr> <td>Total GHG Emissions</td> <td>3,292</td> <td>2,807</td> <td>-485</td> </tr> </tbody> </table> <p>Notes: CO₂e = carbon dioxide equivalent</p> <p>¹ The values presented do not include the full life cycle of GHG emissions that would occur over the production/transport of materials used during the construction of the project or used during the operational life of the project and the end of life for the materials and processes that would occur as an indirect result of the project. Estimating the GHG emissions associated with these processes would be too speculative for meaningful consideration and would require analysis beyond the current state of the art in impact assessment, and may lead to a false or misleading level of precision in reporting operational GHG emissions. Furthermore, indirect emissions associated with in-state energy production and generation of solid waste would be regulated under</p>	Source	Existing CO ₂ e Emissions ¹	CO ₂ e Emissions from the Proposed Project	Net CO ₂ e Emissions (Proposed – Existing)	Operational Emissions at Full Buildout (Year 2011) (metric tons/year)				Mobile Sources	2,476	1,797	-679	Electricity Consumption	627	567	-60	Natural Gas Consumption	123	252	129	Water Consumption	16	31	15	Solid Waste Generation	50	161	111	Total GHG Emissions	3,292	2,807	-485						
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	Significant and Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
<p>AB 32 directly at the source or facility that would handle these processes. The emissions associated with off-site facilities in California would be closely controlled, reported, capped, and traded under AB 32 and California ARB programs, as recommended by ARB's Scoping Plan (ARB 2008). Therefore, it is assumed that GHG emissions associated with these life cycle stages would be consistent with AB 32 requirements. It should be noted that EPA's WARM model is based on a life cycle approach, which reflects emissions and avoided emissions upstream and downstream from the point of use. As such, the emission factors provided in the model provide an account of the net benefit of these actions to the environment. However, the WARM model is the most applicable tool to estimate GHG emissions from solid waste disposal at the time of this writing, and the emissions are included here for completeness.</p> <p>Source: Modeling performed by AECOM in 2010</p> <p>As shown above, the proposed project's net GHG emissions would be below the recommended screening threshold of 900 metric tons per year. Thus, the project would have a less-than-significant impact with respect to GHG emissions and climate change.</p>						
<p>(b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emission of greenhouse gases? Since the project's GHG emissions would fall below the level deemed by CAPCOA and the City to be less than significant, implementation of the proposed project would not hinder the state's ability to attain the GHG-reduction goals identified in AB 32 (the Global Warming Solutions Act). This impact is less than significant.</p>					X	X
8. HAZARDS AND HAZARDOUS MATERIALS						
<p>(a) Substantial health and safety risk related to on-site hazardous materials? The proposed project would include the restoration and rehabilitation of an existing building that is not located on a site that has known hazardous</p>					X	X

	Significant and Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
<p>materials. However, the proposed project would allow for the addition of a medical clinic on the ground floor of the restored building to service the inhabitants and the general homeless population in the downtown planning area. Medical uses typically generate, store, use, and dispose of various types of hazardous waste such as biohazardous waste, pharmaceutical waste, and other toxic chemicals associated with medical instruments, including radioactive waste from x-ray machines (although x-ray machines do not involve radioactive substances, they are regulated as radioactive materials).</p> <p>The project-related effects of hazardous materials handled on-site would generally be limited to the immediate areas where materials would be located because this is where exposure would most likely occur. Accordingly, the individuals most at risk would be the employees at the medical clinic or others in the immediate vicinity of hazardous materials. The routes through which these individuals could be exposed are inhalation, contact, ingestion, injection, and other accidents. Federal and state laws set occupational safety standards to minimize worker safety risks from both physical and chemical hazards in the workplace. The California Division of Occupational Safety and Health (Cal/OSHA) is responsible for developing and enforcing workplace safety standards and assuring worker safety in the handling and use of hazardous materials. Among other requirements, Cal/OSHA requires many entities to prepare Injury and Illness Prevention Plans and Chemical Hygiene Plans. The Hazard Communication Standard requires that workers be informed of the hazards associated with the materials they handle. For instance, manufacturers must appropriately label</p>						

	Significant and Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
<p>containers, Material Safety Data Sheets must be available in the workplace, and employers must properly train workers. The U.S. Occupational Safety and Health Administration's Bloodborne Pathogens Standard requires the use of Universal Precautions (handling all human blood and certain body fluids as if they contain infectious agents) in the workplace. Operation of the proposed project would require compliance with these federal and state safety standards and practices regarding workplace safety to provide a safe and healthy environment for patient care.</p> <p>As such, the proposed project's adherence to existing mandatory federal, state, and local regulations controlling hazardous materials would ensure that impacts associated with this issue are not significant. Therefore, no significant direct or cumulative impacts associated with this issue would occur.</p>						
<p>(b) Be located on or within 2,000 feet of a site that is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment? The project site is not located on the State of California Hazardous Waste and Substances Sites (Cortese) List and is not located on or within 2,000 feet of a site on the State of California Hazardous Waste and Substances Sites List. The County of San Diego maintains a Site Assessment Mitigation (SAM) Case Listing of known contaminated sites throughout the county. While no SAM Case Listings exist on-site, there are several sites on the SAM case listing that are within 2,000 feet of the project site. The majority of the SAM-listed sites are considered closed cases and are not located directly adjacent to the</p>					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)
project site block. Compliance with existing regulations will avoid significant impacts to human health and the environment. Additionally, in accordance with the analysis in the FEIR, adherence to existing mandatory federal, state, and local regulations, as well as uniformly applied development policies and standards, would avoid significant impacts to human health and the environment.						
(c) Substantial safety risk to operations at San Diego International Airport? The project site is within the boundaries of the Airport Influence Area of the Airport Land Use Compatibility Plan (ALUCP) for San Diego International Airport (SDIA). The proposed project would restore the existing building on-site. No changes would be made to the existing building height. The building is currently, and will remain, consistent with the Airspace Protection guidelines and well within the limits of airspace protection. Therefore, no direct or cumulative impacts associated with this issue would occur.					X	X
(d) Substantially impair implementation of an adopted emergency response plan or emergency evacuation plan? The FEIR concludes that development that occurs in accordance with the Downtown Community Plan would not adversely affect implementation of the City of San Diego's Emergency Operations Plan. The construction and operation of the proposed project would not alter or affect the City's ability to adequately respond during an emergency. Therefore, no direct or cumulatively significant impacts associated with this issue are anticipated.					X	X
9. HYDROLOGY AND WATER QUALITY						
(a) Substantially degrade groundwater or surface water quality? Urban runoff generated within					X	X

	Significant and Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
<p>the Downtown Community Plan area is collected by storm drains that eventually discharge into San Diego Bay. San Diego Bay is currently experiencing water quality problems caused by urban development within its watershed. The proposed project site is currently covered by a structure and redevelopment of the site would not result in an increase in impervious surfaces on-site and, therefore, no increase in runoff would occur. Construction activities on-site could result in groundwater discharge of runoff, which would contribute cumulatively to the water quality impacts to San Diego Bay. However, existing state and local regulations, as described under the FEIR, would apply to the project, and would provide protection against significant water quality impacts. Implementation of best management practices (BMPs) required by the City's Standard Urban Storm Water Mitigation Program would likely reduce the project's urban runoff contribution to below the present level. In addition, Waste Discharge Permits required for groundwater discharge during construction would ensure that impacts to groundwater quality are not significant. Therefore, direct impacts associated with groundwater and surface water quality would not be significant.</p> <p>Although the proposed project would not result in direct impacts to water quality, the FEIR concluded that the water quality of San Diego Bay is already impacted, and the addition of any pollutants in urban runoff discharged to the bay would result in a cumulatively significant impact. However, the proposed project would restore and rehabilitate an existing building. It would not generate more urban runoff than what is currently being produced onsite. Therefore, the cumulative</p>						

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)
water quality impact would not be significant.						
(b) Substantially increase impervious surfaces and associated runoff flow rates or volumes? The proposed project is located on a site that is currently developed and covered with impervious surfaces. Implementation of the proposed project would result in impervious surfaces similar to those that presently exist on-site. Therefore, redevelopment of the proposed site would not substantially increase the runoff volume entering the storm drain system, and the proposed project would not substantially increase the pollutant concentration entering the storm drain system since the amount of impervious surfaces would not increase. Consistent with the analysis of the FEIR, direct and cumulative impacts associated with this issue are not significant.					X	X
(c) Substantially impede or redirect flows within a 100-year flood hazard area? The proposed project is located on a site that is not within a 100-year floodplain. Similarly, the proposed project would not affect off-site flood hazard areas, as no 100-year floodplains are located downstream. Therefore, direct and cumulative impacts associated with this issue are not significant.					X	X
(d) Substantially increase erosion and sedimentation? The proposed project is located on a site that is currently developed with impervious surfaces. The hydrology of the proposed site would not be substantially altered by implementation of the proposed project, as the site would maintain a similar quantity of impervious surfaces; therefore, the proposed project would not substantially increase the long-term potential for erosion and sedimentation. However, the potential for erosion and sedimentation could increase during the short-					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)
term during site preparation and other construction activities. The proposed project's compliance with regulations mandating the preparation and implementation of a Storm Water Pollution Prevention Plan would ensure that impacts associated with erosion and sedimentation are not significant. Therefore, no direct or cumulative impacts associated with this issue are anticipated.						
10. LAND USE AND PLANNING						
(a) Physically divide an established community? The proposed project would rehabilitate a historically designated building to preserve the structure, sensitively restore its exterior, and accommodate new and historic uses in the Civic Core neighborhood. The proposed project does not include additional features or structures that would change the existing building footprint and would, therefore, respect the existing street grid; include an appropriately scaled and varied street wall; and ensure light access in the public right-of-way. Therefore, the proposed project would not physically divide an established community and no direct or cumulative impacts associated with this issue are anticipated.					X	X
(b) Substantially conflict with the City's General Plan and Progress Guide, Downtown Community Plan, Centre City PDO or other applicable land use plan, policy, or regulation? The proposed project is located in the Civic Core (C) Land Use District, which is intended to serve as a high-intensity office and employment center. In addition, the site is located within the Employment Required Overlay, which requires at least 50 percent of the gross floor area within each development to be dedicated to employment uses such as professional office, education, cultural, retail,					X	X

	Significant and Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
<p>Issues and Supporting Information</p> <p>hotel, or similar commercial uses.</p> <p>The proposed project would rehabilitate a locally designated historical building into a one-stop service center and housing (transitional and permanent) for the homeless population in the downtown planning area. The project proposes uses that are not consistent with the designated land use overlay district for the project site, the proposed project requires approval of a Conditional Use Permit (CUP) and a Planned Development Permit (PDP).</p> <p>Pursuant to Section 156.0315 (d) of the PDO, historical buildings occupied by uses not otherwise allowed may be permitted with a CUP. The CUP is required for the following uses:</p> <ul style="list-style-type: none"> • Allow for non-employment uses of the facility to exceed 50 percent of the gross floor area within the Employment Required Overlay District; • Allow for the on-site provision of social services and transitional housing. <p>The CUP would contain certain conditions under which the property would be required to operate, such as on-site security, prevention of queuing and loitering, background check of residents, rules of resident and patient conduct, and hours of operation.</p> <p>In addition, the proposed project also requires a PDP to allow for a deviation from the PDO standards to allow for the increased size of living units from an average of 300 square feet to 390 square feet and maximum size from 400 square feet to 430 square feet for 75 units and;</p>						

	Significant and Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
<p>Issues and Supporting Information</p> <p>deviations from Land Development Code (LDC) standards for transitional housing, including but not limited to living area per bed, storage areas, and restroom facilities.</p> <p>While the proposed project would require the above deviations from the PDO, it should be noted that the proposed project does advance the vision and goals of the Downtown Community Plan. Specifically, Policy 3.4-G-5 is stated as follows:</p> <ul style="list-style-type: none"> • Support the development of projects that serve homeless and special needs populations. • Prioritize and build/rehabilitate service enriched rental apartments to meet the housing needs of the chronically homeless. • Assist in the development of affordable, permanent supportive housing projects in the downtown and surrounding neighborhoods. These would serve working families identified in need of transitional housing. <p>In addition, the proposed project also supports the historic preservation goals of the Downtown Community Plan by promoting the adaptive reuse of a historically designated building and encouraging the retention of historical resources on-site.</p> <p>While the proposed project would require a CUP and a PDP for deviations to the PDO, it would complement the overarching goals of the Downtown Community Plan and help to address the significant and not mitigated impacts that</p>						

	Significant and Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
chronic homelessness presents in the downtown planning area. The proposed project would rehabilitate a locally designated historic building according to the Secretary of Interior Standards for Rehabilitation and City of San Diego Chapter 14, Article 3, Division 2 (Historical Resources Regulations) and reintroduce a historic use once provided by the San Diego Athletic Club (i.e., 96 transitional beds). No additional features or structures would be introduced on-site that would cause it to be incompatible with existing downtown-based or regional plans, policies, or regulations. Therefore, no direct or cumulative impacts associated with this issue would occur.						
<p>(c) Substantial incompatibility with surrounding land uses? As defined in the FEIR, sources of land use incompatibility include noise, lighting/shading, and industrial activities. It is not anticipated that construction of the proposed project would result in, or be subject to, adverse impacts due to substantially incompatible land uses.</p> <p>The proposed project would not include noise generators that would cause noise levels at common property lines with noise-sensitive receivers to exceed the limits established by the City's Noise Abatement and Control Ordinance, Section 59.5.01101 through 59.5.0802. While the proposed project would contain sensitive receptors as defined by the FEIR (i.e., residential uses), they would not be significantly impacted by ballpark, traffic, aircraft, or railroad noise. Compliance with the City's Light Pollution Ordinance would ensure that land use incompatibility impacts related to the proposed project's emitting of, and exposure to, lighting are not significant. In addition, existing</p>					X	X

	Significant and Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
<p>Issues and Supporting Information</p> <p>mandatory local, state, and federal regulations controlling industrial activities would ensure that if the project were to be constructed and operated at the project site, it would not be vulnerable to potential land use compatibility impacts resulting from its proximity to nearby industrial activities.</p> <p>It is also noted the downtown planning area is a unique urban environment that hosts a mix of uses in close proximity to one another (i.e., bars, restaurants, residences, retail, daycare facilities, auto repair shops, social service facilities, etc.). It is recognized that this mix of land uses downtown is internally compatible for an urbanized area. The proposed project would provide shelter and rehabilitation services to currently homeless individuals on a site that is in close proximity to nearby residences, offices, and a preschool. The CUP would place certain conditions of approval on the project, including a 24-hr security monitor and additional requirements that would ensure that any illegal behavior in or around the building would be minimal. Residents of the living units would be screened via Megan's Law and intake specialist would also perform intensive reviews and background checks. Additional appropriate measures would be taken to ensure that the proposed project would not conflict with the existing surrounding land uses. Therefore, no direct or cumulative issues associated with land use incompatibility are anticipated.</p>						
<p>(d) Substantially impact surrounding communities due to sanitation and litter problems generated by transients displaced by downtown development? The purpose of the proposed project is to help address the on-going impacts associated with chronic homelessness</p>					X	X

	Significant and Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
<p>Issues and Supporting Information</p> <p>within the downtown planning area. While the proposed project would attract homeless individuals to the project site to receive services, only those individuals seeking the services provided on-site or residing on-site would be visiting the center. The center would not include a feeding program or other services which could attract other homeless individuals. It should also be noted that the immediate area surrounding A Street and Sixth Avenue is an area where transients are already known to congregate under current conditions. In addition, the proposed project would have to meet conditions of approval as defined in the CUP discussed above in Section 9(b).</p> <p>Upon approval, the proposed project would provide transitional and permanent housing and supportive medical and rehabilitation services for the homeless population. The proposed project would serve to meet the needs of the chronically homeless and offset the displacement of this population to surrounding neighborhoods and communities by providing shelter and rehabilitative care for these individuals, with the ultimate goal of integration back into the community. Therefore, the proposed project would not result in the direct or cumulative displacement of homeless populations into surrounding neighborhoods.</p>						
11. MINERAL RESOURCES						
<p>(a) Substantially reduce the availability of important mineral resources? The FEIR concludes that the viable extraction of mineral resources is limited in the downtown planning area due to its urbanized nature and the fact that the area is not designated as having high mineral resource potential. Therefore, no direct or</p>					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)
cumulative impacts associated with this issue would occur.						
12. NOISE						
<p>(a) Substantial noise generation? The proposed project would result in short-term impacts from noise generated from construction activity associated with building restoration activities. Impacts from construction noise would be avoided by adherence to construction noise limitations imposed by the City's Noise Abatement and Control Ordinance.</p> <p>According to the analysis in the FEIR, noise generation resulting from new development would not generate substantial stationary noise that would adversely affect the acoustic environment. Consistent with the conclusion in the FEIR, the proposed project would not generate substantial stationary noise. However, for mobile source noise, the FEIR defines a significant long-term traffic noise increase as an increase of at least 3.0 A-weighted decibels (dBA) community noise equivalent level (CNEL) for street segments already exceeding 65 dBA CNEL. The FEIR identified nine segments in the downtown planning area that would be significantly impacted as a result of traffic generation. The proposed project is not located on any of the identified segments. In addition, the proposed project would not result in a substantial increase in traffic noise due to the proposed uses (i.e., supportive services and housing for the homeless). In addition, the proposed project would restore an existing building in accordance with the California Building Code Title 24 standards. Therefore, no significant or direct impacts associated with this issue would occur.</p>					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) Substantial exposure of required outdoor residential open spaces or public parks and plazas to noise levels (e.g., exposure to levels exceeding 65 dBA CNEL)? The proposed project would not be required to provide outdoor residential open spaces or public parks. Therefore, no significant or direct impacts associated with this issue would occur.					X	X
(c) Substantial interior noise within habitable rooms (e.g., levels in excess of 45 dBA CNEL)? The proposed project would be required to restore the existing building in adherence to Title 24 of the California Building Code. In addition, implementation of Mitigation Measure NOI-B.1-1 would reduce the impacts associated with interior noise in habitable rooms to a level less than significant. Therefore, project-level impacts associated with this issue are anticipated to be less than significant with mitigation. Cumulative impacts associated with this issue would not occur.			X			X
13. POPULATION AND HOUSING						
(a) Substantially induce population growth in an area? The proposed project would provide transitional and permanent affordable supportive housing to serve the existing homeless population in the downtown planning area. It would not induce population growth to exceed that analyzed throughout the FEIR. Therefore, no direct or cumulative impacts associated with this issue would occur.					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)
<p>(b) Substantial displacement of existing housing units or people? The proposed project would result in the rehabilitation and reuse of an existing historically designated building. Currently, the building is used for office space; however, the proposed project would allow for the conversion of uses to interim and permanent housing with supportive services for the homeless population in the downtown planning area. It would not displace existing housing or people; rather, it would provide additional transitional housing beds and permanent living units for the chronically homeless population. The proposed project is not anticipated to generate population growth to exceed that analyzed throughout the FEIR. No direct or cumulative impacts associated with this issue would occur.</p>					X	X
14. PUBLIC SERVICES AND UTILITIES:						
<p>(a) Substantial adverse physical impacts associated with the provision of new schools? The population of school-aged children attending public schools is dependent on current and future residential development. The proposed project would provide interim and permanent housing for the existing homeless population in the downtown planning area. The project, in and of itself, would not generate a sufficient number of students to warrant construction of a new school facility due to the proposed uses of the project.</p> <p>However, the FEIR concludes that the additional student population anticipated at buildout of the downtown planning area would require the construction of at least one additional school, and that additional capacity could potentially be accommodated in existing facilities. The specific future location of new facilities is unknown at the</p>					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)
present time. Pursuant to Section 15145 of CEQA, analysis of the physical changes in the downtown planning area, which may occur from future construction of these public facilities, would be speculative and no further analysis of their impacts is required. Construction of any additional schools would be subject to CEQA. Environmental documentation prepared pursuant to CEQA would identify potentially significant impacts and appropriate mitigation measures. Therefore, the proposed project would not result in direct or cumulative impacts associated with this issue. Therefore, the proposed project would not result in direct or cumulative impacts associated with this issue.						
(b) Substantial adverse physical impacts associated with the provision of new libraries? The FEIR concludes that, cumulatively, development in downtown would generate the need for a new Main Library and possibly several smaller libraries in downtown. The proposed project, in and of itself, would not generate significant additional demand necessitating the construction of new library facilities. However, according to the analysis in the FEIR, the proposed project is considered to contribute to the cumulative need for new library facilities in the downtown identified in the FEIR. Nevertheless, the specific future location of these facilities (except the Main Library) is unknown at present. Pursuant to Section 15145 of CEQA, analysis of the physical changes in the downtown planning area, which may occur from future construction of these public facilities, would be speculative and no further analysis of their impacts is required. (The environmental impacts of the Main Library were analyzed in a Secondary Study prepared by CCDC in 2001.) Construction of any additional library facilities would be subject to CEQA.					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)
Environmental documentation prepared pursuant to CEQA would identify potentially significant impacts and appropriate mitigation measures. Therefore, the proposed project would not result in direct or cumulative impacts associated with this issue.						
(c) Substantial adverse physical impacts associated with the provision of new fire protection/emergency facilities? The FEIR does not conclude that the cumulative development of the downtown area would generate additional demand necessitating the construction of new fire protection/emergency facilities. However, through the collective efforts of the City, the Redevelopment Agency, and CCDC, two sites for new fire stations have been secured in the downtown area. The proposed project would not result in direct or cumulative impacts associated with the provision of new fire protection/emergency services beyond those analyzed within this Secondary Study.					X	X
(d) Substantial adverse physical impacts associated with the provision of new law enforcement facilities? The FEIR concludes that the construction of new law enforcement facilities would not be required with buildout of the downtown planning area. The proposed project would not generate a level of demand for law enforcement facilities beyond the current levels and those assumed by the FEIR. However, the need for a new facility could be identified in the future. Pursuant to Section 15145 of CEQA, analysis of the physical changes in the downtown planning area, which may occur from future construction, would be speculative and no further analysis of their impacts is required. However, construction of new law enforcement facilities would be subject to CEQA. Environmental					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)
documentation prepared pursuant to CEQA would identify potentially significant impacts and appropriate mitigation measures. Therefore, the proposed project would not result in direct or cumulative impacts associated with this issue.						
(e) Substantial adverse physical impacts associated with the provision of new water transmission or treatment facilities? The FEIR concludes that new water treatment facilities would not be required to address the cumulative development of downtown. In addition, water pipe improvements that may be needed to serve the proposed project are categorically exempt from environmental review under CEQA, as stated in the FEIR. Therefore, the proposed project would not result in direct or cumulative impacts associated with this issue.					X	X
(f) Substantial adverse physical impacts associated with the provision of new storm water facilities? The FEIR concludes that the cumulative development of downtown would not impact the existing downtown storm drain system. Since implementation of the proposed project would result in impervious surfaces similar to the existing use of the site, the amount of runoff volume entering the storm drain system would not increase. Therefore, the proposed project would not create demand for new storm water facilities, and would not result in direct or cumulative impacts associated with this issue.					X	X
(g) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed? California Water Code Section 10910 requires projects analyzed under CEQA to assess water demand and compare that finding to the jurisdiction's projected water supply. The proposed project does not require the					X	X

	Significant and Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
<p>preparation of a Water Supply Assessment (WSA), as it does not meet any of the thresholds established by SB 610 or SB 221. According to the FEIR, in the short term, planned water supplies and transmission or treatment facilities are adequate. Expansion of the Alvarado Water Treatment Plant (construction scheduled to be complete in winter 2010) would also provide increased capacity for treating water supply for the downtown area. Water transmission infrastructure necessary to transport water supply to the downtown area is already in place. Potential direct impacts would not be significant. However, buildout of the 2006 Downtown Community Plan would generate 1.4 percent more water demand than planned for in the adopted 2005 Urban Water Management Plan (UWMP). This additional demand was not considered in San Diego County Water Authority's (SDCWA's) UWMP. To supplement this and meet the additional need, SDCWA indicates that it will have a local water supply (from surface water, water recycling, groundwater, and seawater desalination) to meet the additional demand resulting from buildout of the Downtown Community Plan. In accordance with the conclusion in the FEIR, this additional demand would not represent a substantial increase in the challenge of meeting the otherwise anticipated demand for water within the SDCWA service area. Since the proposed project does not meet the requirements of SB 610 and is consistent with the Downtown Community Plan, direct and cumulative impacts related to water supply would be considered not significant.</p>						
(h) Substantial adverse physical impacts associated with the provision of new wastewater transmission or treatment facilities? The FEIR concludes that 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)
wastewater treatment facilities would not be required to address the cumulative development of downtown. In addition, sewer improvements that may be needed to serve the proposed project are categorically exempt from environmental review under CEQA, as stated in the FEIR. Therefore, the proposed project would not result in direct or cumulative impacts associated with this issue.						
<p>(i) Substantial adverse physical impacts associated with the provision of new landfill facilities? The FEIR concludes that cumulative development within the downtown planning area would increase the amount of solid waste sent to the Miramar Landfill and contribute to the eventual need for an alternative landfill. The proposed project is not likely to generate a higher level of solid waste than the existing use of the site; however, implementation of a mandatory Waste Management Plan and compliance with the applicable provisions of the San Diego Municipal Code would ensure that both short- and long-term project-level impacts are not significant. However, the project would contribute, in combination with other development activities in downtown, to the cumulative increase in the generation of solid waste sent to the Miramar Landfill and the eventual need for a new landfill, as identified in the FEIR.</p> <p>The location and size of a new landfill is unknown at this time. Pursuant to Section 15145 of CEQA, analysis of the physical changes that may occur from future construction of landfills would be speculative and no further analysis of their impacts is required. However, construction or expansion of a landfill would be subject to CEQA. Environmental documentation prepared</p>					X	X

	Significant and Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
pursuant to CEQA would identify potentially significant impacts and appropriate mitigation measures. Therefore, the proposed project would not result in direct or cumulative impacts associated with this issue.						
15. PARKS AND RECREATIONAL FACILITIES:						
(a) Substantial increase in the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? The proposed project would establish interim and permanent housing with supportive services for the existing homeless population. It would not result in an increase in the level of demand for parks and recreational facilities beyond the level assumed by the FEIR. Therefore, substantial deterioration of existing neighborhood or regional parks would not occur or be substantially accelerated as a result of the proposed project. No direct or cumulative significant impacts associated with this issue would occur.					X	X
16. TRANSPORTATION/TRAFFIC						
(a) Cause the level of service (LOS) on a roadway segment or intersection to drop below LOS E? According to the FEIR, any project that is anticipated to generate more than 2,400 average daily trips (ADT) could result in significant direct impacts on roadway segments and intersections, and a project-level traffic study would be required. Based on the anticipated use of the proposed project (i.e., transitional housing, medical clinic, and supportive offices), and the May 2003 San Diego Municipal Code Trip Generation Manual, the worst-case scenario is 1,100 ADT. Since this estimate is below the threshold set forth in the		X			X	

	Significant and Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
<p>FEIR, the proposed project does not require a project-specific traffic study.</p> <p>It is important to note that all trips from project operation may not necessarily be considered “new” trips. The project site is currently occupied by office space that generates an estimated 1,422 ADT. Therefore, there would be a net reduction in ADT at the project site with implementation of the proposed project. While the project site is located in close proximity to the intersection at Sixth Avenue and Ash Street, which is operating at level of service (LOS) F during both AM and PM peak hours, the proposed project would not contribute additional trips over existing conditions at these intersections. Therefore, the proposed project would not result in significant direct impacts at impacted intersections.</p> <p>While the proposed project would generate a relatively low number of daily trips given the reuse of the existing building and the actual uses proposed as part of the project, it would continue to generate daily trips nonetheless. In conjunction with other development downtown, the proposed project would continue to contribute to the cumulative traffic impacts anticipated by the FEIR. The FEIR includes mitigation measures to address these impacts, but they may or may not be able to fully mitigate these cumulative impacts (these mitigation measures are not the responsibility of the proposed project and are, therefore, not included in Attachment A). Therefore, consistent with the conclusions in the FEIR, the proposed project could contribute to significant cumulative impacts associated with roadway and intersection capacity and could contribute to causing LOS on a roadway segment</p>						

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 intersection to drop below an acceptable LOS. Cumulative impacts associated with this issue remain significant and unavoidable.						
<p>(b) Cause the LOS on a freeway segment to drop below LOS E or cause a ramp delay in excess of 15 minutes? The FEIR concludes that development pursuant to the Downtown Community Plan would result in significant cumulative impacts to freeway segments and ramps serving the downtown planning area. The proposed project would not have a significant direct impact on freeway segments or ramp delays because of the net reduction in traffic generation that is estimated to occur according to the analysis conducted in Section 15(a).</p> <p>However, the FEIR concludes that new development and redevelopment within the downtown area would result in significant cumulative impacts to freeway segments and ramps serving the downtown area. As discussed in Section 15(a), while the project would likely result in a reduction of trips compared to existing conditions, it would still generate trips. Consistent with the analysis in the FEIR, the proposed project would contribute on a cumulative level to the substandard LOS identified in the FEIR on all freeway segments in the downtown area and on several ramps serving the downtown. FEIR Mitigation Measure TRF-A.2.I-1 would reduce these impacts to the extent feasible, but not below a level of significance, (this mitigation measure is not the responsibility of the proposed project, and, therefore, is not included in Attachment A). The FEIR concludes that the uncertainty associated with implementing freeway improvements and limitations in increasing ramp capacity limits the feasibility of</p>		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)
fully mitigating impacts to these facilities. Thus, the proposed project's cumulative-level impacts to freeways would remain significant and unavoidable, consistent with the analysis of the FEIR.						
(c) Create an average demand for parking that would exceed the average available supply? According to Table 156-0313A of the PDO, living units at or below 40 percent Area Median Income (AMI) are not required to provide parking. The proposed project would have an AMI of 33 percent; therefore, no parking is required for the living units. Parking requirements for transitional housing facilities are established through the CUP review process, and the Facility is proposing (with staff support) that no parking be required for this use as the residents will be formerly homeless individuals. The one-stop multi-service center and offices are also exempt from parking requirements as they will be located in an existing building and conversions from one commercial land use to another are exempted from parking requirements under the PDO. Employees of the project requiring parking can secure monthly parking passes from public parking facilities nearby similar to other commercial uses in the area. Therefore, no direct or permanent impacts associated with this issue would occur.					X	X
(d) Substantially discourage the use of alternative modes of transportation or cause transit service capacity to be exceeded? It is likely that the majority of the inhabitants of the proposed project would not own vehicles, and, therefore, would be travelling to and from the project site via transit and non-motorized methods of travel (i.e., bike and pedestrian). The proposed project would not include any features that would discourage 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)
use of alternative modes of transportation, nor would it include any design features that would cause hazards or barriers for pedestrians or bicyclists. Therefore, no impact would occur associated with transit or alternative modes of transportation.						
17. 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? As indicated in the FEIR, due to the highly urbanized nature of the downtown area, no sensitive plant or animal species, habitats, or wildlife migration corridors are located in the Centre City area. The project does not have the potential to eliminate important examples of major periods of California history or prehistory at the project level. No other aspects of the project would substantially degrade the environment. Cumulative impacts are described in subsection 16(b), below.					X	X
(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)? As acknowledged in the FEIR, implementation of the Downtown Community Plan, PDO, and Redevelopment Plan		X				

	Significant and Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
would result in cumulative impacts associated with aesthetics/visual quality, air quality, historical and archaeological resources, physical changes associated with transient activities, noise, parking, traffic, and water quality. The proposed project would contribute to those traffic and water quality impacts. No feasible mitigation was identified to reduce these cumulative impacts to a level less than significant; therefore, the impacts would remain significant and not mitigated. Cumulative impacts would not be greater than those identified in the FEIR.						
(c) Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly? As described elsewhere in this study, the proposed project would result in significant and unmitigated impacts. However, none of those impacts would have substantial adverse effects on human beings. Further, these impacts would be no greater than those assumed in the FEIR. Implementation of the mitigation measures identified in the FEIR would mitigate many, but not all, of the significant impacts.					X	X

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California Energy Commission (CEC)

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- 2007a *California Energy - Water Relationship Staff Report*. Available at <http://www.energy.ca.gov/2007publications/CEC-999-2007-008/CEC-999-2007-008.PDF>. Accessed December 2010.

- 2007b *Water-Related Energy Use in California*. Available at <http://www.energy.ca.gov/2007publications/CEC-999-2007-008/CEC-999-2007-008.PDF>. Accessed December 2010.

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ATTACHMENT A

**MITIGATION MEASURES FOR THE PROPOSED
CONNECTIONS HOUSING PROJECT**

JANUARY 2011

SIGNIFICANT IMPACT(S)	MITIGATION MEASURE(S)	IMPLEMENTATION TIME FRAME	IMPLEMENTATION RESPONSIBILITY	VERIFICATION RESPONSIBILITY
AIR QUALITY (AQ)				
<p>Impact AQ-B.1: Dust and construction equipment engine emissions generated during grading and demolition would impact local and regional air quality. (Direct and Cumulative)</p>	<p><i>Mitigation Measure AQ-B.1-1:</i> Prior to approval of a Grading or Demolition Permit, the City shall confirm that the following conditions have been applied, as appropriate:</p> <ol style="list-style-type: none"> 1. Exposed soil areas shall be watered twice per day. On windy days or when fugitive dust can be observed leaving the development site, additional applications of water shall be applied as necessary to prevent visible dust plumes from leaving the development site. When wind velocities are forecast to exceed 25 miles per hour, all ground-disturbing activities shall be halted until winds that are forecast to abate below this threshold. 2. Dust-suppression techniques shall be implemented, including, but not limited to, the following: <ol style="list-style-type: none"> a. Portions of the construction site to remain inactive longer than 3 months shall be seeded and watered until grass cover is grown or otherwise stabilized in a manner acceptable to the CCDC. b. On-site access points shall be paved as soon as feasible or watered periodically or otherwise stabilized. c. Material transported off-site shall be either sufficiently watered or securely covered to prevent excessive amounts of dust. d. The area disturbed by clearing, grading, earthmoving, or excavation operations shall be minimized at all times. 3. Vehicles on the construction site shall travel at speeds less than 15 miles per hour. 	<p>Prior to Demolition or Grading Permit (Design)</p>	<p>Developer</p>	<p>City</p>

SIGNIFICANT IMPACT(S)	MITIGATION MEASURE(S)	IMPLEMENTATION TIME FRAME	IMPLEMENTATION RESPONSIBILITY	VERIFICATION RESPONSIBILITY
	<ol style="list-style-type: none"> 4. Material stockpiles subject to wind erosion during construction activities, which will not be utilized within 3 days shall be covered with plastic, an alternative cover deemed equivalent to plastic, or sprayed with a nontoxic chemical stabilizer. 5. Where vehicles leave the construction site and enter adjacent public streets, the streets shall be swept daily or washed down at the end of the work day to remove soil tracked onto the paved surface. Any visible track-out extending for more than 50 feet from the access point shall be swept or washed within 30 minutes of deposition. 6. All diesel-powered vehicles and equipment shall be properly operated and maintained. 7. All diesel-powered vehicles and gasoline-powered equipment shall be turned off when not in use for more than 5 minutes, as required by state law. 8. The construction contractor shall use electric or natural-gas-powered equipment in lieu of gasoline or diesel-powered engines, where feasible. 9. As much as possible, the construction contractor shall time the construction activities so as not to interfere with peak hour traffic. To minimize obstruction of through-traffic lanes adjacent to the site, a flag-person shall be retained to maintain safety adjacent to existing roadways, if necessary. 10. The construction contractor shall support and encourage ridesharing and transit incentives for the construction crew. 11. Low VOC coatings shall be used as required by SDAPCD Rule 67. Spray equipment with high transfer efficiency, such as the high- pressure/low-volume (HPLV) spray method, or manual coatings application such as paint brush hand roller, trowel, spatula, dauber, rag, or sponge, shall be used to reduce VOC emissions, where feasible. 			

SIGNIFICANT IMPACT(S)	MITIGATION MEASURE(S)	IMPLEMENTATION TIME FRAME	IMPLEMENTATION RESPONSIBILITY	VERIFICATION RESPONSIBILITY
	<p>12. If construction equipment powered by alternative fuel sources (LPG/CNG) is available at comparable cost, the developer shall specify that such equipment be used during all construction activities on the development site.</p> <p>13. The developer shall require the use of particulate filters on diesel construction equipment if use of such filters is demonstrated to be cost-competitive for use on this development.</p> <p>14. During demolition activities, safety measures as required by the City, San Diego County, and state for removal of toxic or hazardous materials shall be used.</p> <p>15. Rubble piles shall be maintained in a damp state to minimize dust generation.</p> <p>16. During finish work, low-VOC paints and efficient transfer systems shall be used, to the extent possible.</p> <p>17. If alternative-fueled and/or particulate-filter-equipped construction equipment is not feasible, construction equipment shall use the newest, least-polluting equipment whenever possible.</p>			

SIGNIFICANT IMPACT(S)	MITIGATION MEASURE(S)	IMPLEMENTATION TIME FRAME	IMPLEMENTATION RESPONSIBILITY	VERIFICATION RESPONSIBILITY
HISTORICAL RESOURCES (HIST)				
<p>Impact HIST-A.1: Future development in downtown could impact significant architectural structures. (Direct and Cumulative)</p>	<p><i>Mitigation Measure HIST-A.1-2:</i> If the potential exists for direct and/or indirect impacts to retained or relocated designated and/or potential historical resources ("historical resources"), the following measures shall be implemented in coordination with a Development Services Department designee and/or City Staff to the Historic Resources Board (HRB) ("City Staff") in accordance with Chapter 14, Article 3, Division 2, Historical Resources Regulations of the Land Development Code.</p> <p>I. Prior to Permit Issuance</p> <p>A Construction Plan Check</p> <p>1. Prior to Notice to Proceed (NTP) for any construction permits, including the first Grading and Building Permits, but prior to the first preconstruction meeting (Precon Meeting), whichever is applicable, City Staff shall verify that the requirements for historical monitoring during demolition and/or stabilization have been noted on the appropriate construction documents.</p> <p>(a) Stabilization work cannot begin until a Precon Meeting has been held at least 1 week prior to issuance of appropriate permits.</p> <p>(b) Physical description, including the year and type of historical resource, and extent of stabilization shall be noted on the plans.</p> <p>B. Submittal of Treatment Plan for Retained Historical Resources</p> <p>1. Prior to NTP for any construction permits, including the first Grading Permit and Building Permits, but prior to the first Precon Meeting, whichever is applicable, the Applicant shall submit</p>	<p>Prior to Development Permit (Design)</p> <p>Prior to Demolition, Grading, and/or Building Permit (Design)</p> <p>Prior to Certificate of Occupancy (Implementation)</p>	<p>Developer</p>	<p>CCDC/City</p>

SIGNIFICANT IMPACT(S)	MITIGATION MEASURE(S)	IMPLEMENTATION TIME FRAME	IMPLEMENTATION RESPONSIBILITY	VERIFICATION RESPONSIBILITY
	<p>a Treatment Plan to City Staff for review and approval in accordance with the Secretary of the Interior's Standards for the Treatment of Historic Properties (1995) and the associated Guidelines. The Treatment Plan shall include measures for protecting any historical resources, as defined in the Land Development Code, during construction-related activities (e.g., removal of non-historic features, demolition of adjacent structures, subsurface structural support). The Treatment Plan shall be shown as notes on all construction documents (i.e., Grading and/or Building Plans).</p> <p>C. Letters of Qualification have been submitted to City Staff</p> <ol style="list-style-type: none"> 1. The Applicant shall submit a letter of verification to City Staff identifying the Principal Investigator (PI) for the project and the names of all persons involved in this MMRP (i.e., Architectural Historian, Historic Architect, and/or Historian), as defined in the City of San Diego Historical Resources Guidelines (HRG). 2. City Staff will provide a letter to the Applicant confirming that the qualifications of the PI and all persons involved in the historical monitoring of the project meet the qualification standards established by the HRG. Prior to the start of work, the applicant must obtain approval from City Staff for any personnel changes associated with the monitoring program. <p>II. Prior to Start of Construction</p> <p>A. Documentation Program (DP)</p> <ol style="list-style-type: none"> 1. Prior to the first Precon Meeting and/or issuance of any construction permit, the DP shall be submitted to City Staff for review and approval 			

SIGNIFICANT IMPACT(S)	MITIGATION MEASURE(S)	IMPLEMENTATION TIME FRAME	IMPLEMENTATION RESPONSIBILITY	VERIFICATION RESPONSIBILITY
	<p>and shall include the following:</p> <p>(a) Photo Documentation:</p> <p>(1) Documentation shall include professional-quality photo documentation of the historical resource(s) prior to any construction that may cause direct and/or indirect impacts to the resource(s) with 35mm black and white photographs, 4x6-inch standard format, taken of all four elevations and close-ups of select architectural elements, such as roof/wall junctions, window treatments, and decorative hardware. Photographs shall be of archival quality and easily reproducible.</p> <p>(2) Xerox copies or CD of the photographs shall be submitted for archival storage with the City of San Diego Historical Resources Board and the CCDC Project file. One set of original photographs and negatives shall be submitted for archival storage with the California Room of the City of San Diego Public Library, the San Diego Historical Society and/or other relative historical society or group(s).</p> <p>(b) Required drawings:</p> <p>(1) Measured drawings of the building's exterior elevations depicting existing conditions or other relevant features shall be produced from recorded, accurate measurements. If portions of the building are not accessible for measurement, or cannot be reproduced from historic sources, they should not</p>			

SIGNIFICANT IMPACT(S)	MITIGATION MEASURE(S)	IMPLEMENTATION TIME FRAME	IMPLEMENTATION RESPONSIBILITY	VERIFICATION RESPONSIBILITY
	<p>be drawn, but clearly labeled as not accessible. Drawings produced in ink on translucent material or archivally stable material (blue-line drawings) are acceptable). Standard drawing sizes are 19" x 24" or 24" x 36". standard scale is 1/4" = 1 foot.</p> <p>(2) One set of measured drawings shall be submitted for archival storage with the City of San Diego Historical Resources Board, the CCDDC Project file, the South Coastal Information Center, the California Room of the City of San Diego Public Library, the San Diego Historical Society and/or other historical society or group(s).</p> <p>2. Prior to the first Precon Meeting, City Staff shall verify that the DP has been approved.</p> <p>B. PI Shall Attend Precon Meetings</p> <p>1. Prior to beginning any work that may impact any historical resource(s) which is/are subject to this MMRP, the Applicant shall arrange a Precon Meeting that shall include the PI, Construction Manager (CM) and/or Grading Contractor, Resident Engineer (RE), Historical Monitor(s), Building Inspector (BI), if appropriate, and City Staff. The qualified Historian and/or Architectural Historian shall attend any grading/excavation related Precon Meetings to make comments and/or suggestions concerning the Historical Monitoring program with the Construction Manager and/or Grading Contractor.</p> <p>(a) If the PI is unable to attend the Precon Meeting, the Applicant shall schedule a focused Precon Meeting with City Staff.</p>			

SIGNIFICANT IMPACT(S)	MITIGATION MEASURE(S)	IMPLEMENTATION TIME FRAME	IMPLEMENTATION RESPONSIBILITY	VERIFICATION RESPONSIBILITY
	<p>the PI, RE, CM or BI, if appropriate, prior to the start of any work that requires monitoring.</p> <p>2. Historical Monitoring Plan (HMP)</p> <p>(a) Prior to the start of any work that is subject to an HMP, the PI shall submit an HMP which describes how the monitoring would be accomplished for approval by City Staff. The HMP shall include an Historical Monitoring Exhibit (HME) based on the appropriate construction documents (reduced to 11x17) to City Staff identifying the areas to be monitored including the delineation of grading/excavation limits.</p> <p>(b) Prior to the start of any work, the PI shall also submit a construction schedule to City Staff through the RE indicating when and where monitoring will occur.</p> <p>(c) The PI may submit a detailed letter to City Staff prior to the start of work or during construction requesting a modification to the monitoring program. This request shall be based on relevant information such as review of final construction documents which indicate site conditions such as underpinning, shoring and/or extensive excavation which could result in impacts to, and/or reduce impacts to the on-site or adjacent historical resource.</p> <p>C. Implementation of Approved Treatment Plan for Historical Resources</p> <p>1. Implementation of the approved Treatment Plan for the protection of historical resources within the project site may not begin prior to the completion of the Documentation Program as defined above.</p>			

SIGNIFICANT IMPACT(S)	MITIGATION MEASURE(S)	IMPLEMENTATION TIME FRAME	IMPLEMENTATION RESPONSIBILITY	VERIFICATION RESPONSIBILITY
	<p>2. The qualified Historical Monitor(s) shall attend weekly jobsite meetings and be on-site daily during the stabilization phase for any retained or adjacent historical resource to photo document the Treatment Plan process.</p> <p>3. The qualified Historical Monitor(s) shall document activity via the Consultant Site Visit Record (CSV). The CSV's shall be faxed by the CM to the RE the first day and last day (Notification of Monitoring Completion) of the Treatment Plan process and in the case of ANY unanticipated incidents. The RE shall forward copies to City Staff.</p> <p>4. Prior to the start of any construction related activities, the applicant shall provide verification to City Staff that all historical resources on-site have been adequately stabilized in accordance with the approved Treatment Plan. This may include a site visit with City Staff, the CM, RE or BI, but may also be accomplished through submittal of the draft Treatment Plan photo documentation report.</p> <p>5. City Staff will provide written verification to the RE or BI after the site visit or upon approval of draft Treatment Plan report indicating that construction related activities can proceed.</p> <p>III. During Construction</p> <p>A. Qualified Historical Monitor(s) Shall be Present During Grading/Excavation/Trenching</p> <p>1. The Qualified Historical Monitor(s) shall be present full-time during grading/excavation/trenching activities which could result in impacts to historical resources as identified on the HME. The Construction Manager is responsible for notifying the RE, PI.</p>			

SIGNIFICANT IMPACT(S)	MITIGATION MEASURE(S)	IMPLEMENTATION TIME FRAME	IMPLEMENTATION RESPONSIBILITY	VERIFICATION RESPONSIBILITY
	<p>and City Staff of changes to any construction activities.</p> <ol style="list-style-type: none"> 2. The Qualified Historical Monitor(s) shall document field activity via the Consultant Site Visit Record (CSVR). The CSVR's shall be faxed by the CM to the RE the first day of monitoring, the last day of monitoring, monthly (Notification of Monitoring Completion), and in the case of ANY incidents involving the historical resource. The RE shall forward copies to City Staff. 3. The PI may submit a detailed letter to City Staff during construction requesting a modification to the monitoring program when a field condition arises which could affect the historical resource being retained on-site or adjacent to the construction site. <p>B. Notification Process</p> <ol style="list-style-type: none"> 1. In the event of damage to a historical resource retained on-site or adjacent to the project site, the Qualified Historical Monitor(s) shall direct the contractor to temporarily divert construction activities in the area of historical resource and immediately notify the RE or BI, as appropriate, and the PI (unless Monitor is the PI). 2. The PI shall immediately notify City Staff by phone of the incident, and shall also submit written documentation to City Staff within 24 hours by fax or email with photos of the resource in context, if possible. <p>C. Determination/Evaluation of Impacts to a Historical Resource</p> <ol style="list-style-type: none"> 1. The PI shall evaluate the incident relative to the historical resource. 			

SIGNIFICANT IMPACT(S)	MITIGATION MEASURE(S)	IMPLEMENTATION TIME FRAME	IMPLEMENTATION RESPONSIBILITY	VERIFICATION RESPONSIBILITY
	<p>(a) The PI shall immediately notify City Staff by phone to discuss the incident and shall also submit a letter to City Staff indicating whether additional mitigation is required.</p> <p>(b) If impacts to the historical resource are significant, the PI shall submit a proposal for City Staff review and written approval in accordance with Chapter 14, Article 3, Division 2, Historical Resources Regulations of the Land Development Code and the Secretary of the Interior's Standards for the Treatment of Historic Properties (1995) and the associated Guidelines. Direct and/or indirect impacts to historical resources from construction activities must be mitigated before work will be allowed to resume.</p> <p>(c) If impacts to the historical resource are not considered significant, the PI shall submit a letter to City Staff indicating that the incident will be documented in the Final Monitoring Report. The letter shall also indicate that that no further work is required.</p> <p>IV. Night Work</p> <p>A. If night and/or weekend work is included in the contract</p> <ol style="list-style-type: none"> 1. When night and/or weekend work is included in the contract package, the extent and timing shall be presented and discussed at the Precon Meeting. 2. The following procedures shall be followed. <ul style="list-style-type: none"> (a) No Impacts/Incidents In the event that no historical resources were impacted during night and/or weekend work, the PI shall record the information on the CSVR and submit to City Staff via fax by 8 am of the next business day. 			

SIGNIFICANT IMPACT(S)	MITIGATION MEASURE(S)	IMPLEMENTATION TIME FRAME	IMPLEMENTATION RESPONSIBILITY	VERIFICATION RESPONSIBILITY
	<p>(b) Potentially Significant Impacts If the PI determines that a potentially significant impact has occurred to a historical resource, the procedures detailed under Section III - During Construction shall be followed.</p> <p>(c) The PI shall immediately contact City Staff, or by 8 am of the next business day to report and discuss the findings as indicated in Section III-B, unless other specific arrangements have been made.</p> <p>B. If night and/or weekend work becomes necessary during the course of construction:</p> <p>1. The Construction Manager shall notify the RE, or BI, as appropriate, a minimum of 24 hours before the work is to begin. The RE, or BI, as appropriate, shall notify City Staff immediately.</p> <p>C. All other procedures described above shall apply, as appropriate.</p> <p>V. Post Construction</p> <p>A. Submittal of Draft Monitoring Report</p> <p>1. The PI shall submit two copies of the Draft Monitoring Report (even if negative), prepared in accordance with the Historical Resources Guidelines and Appendices which describes the results, analysis, and conclusions of all phases of the Historical Monitoring Program (with appropriate graphics) to City Staff for review and approval within 90 days following the completion of monitoring.</p> <p>(a) The preconstruction Treatment Plan and Documentation Plan (photos and measured</p>			

SIGNIFICANT IMPACT(S)	MITIGATION MEASURE(S)	IMPLEMENTATION TIME FRAME	IMPLEMENTATION RESPONSIBILITY	VERIFICATION RESPONSIBILITY
	<p>drawings) and Historical Commemorative Program, if applicable, shall be included and/or incorporated into the Draft Monitoring Report.</p> <p>(b) The PI shall be responsible for updating (on the appropriate State of California Department of Park and Recreation forms-DPR 523 A/B) any existing site forms to document the partial and/or complete demolition of the resource. Updated forms shall be submitted to the South Coastal Information Center with the Final Monitoring Report.</p> <p>2. City Staff shall return the Draft Monitoring Report to the PI for revision or, for preparation of the Final Report.</p> <p>3. The PI shall submit revised Draft Monitoring Report to City Staff for approval.</p> <p>4. City Staff shall provide written verification to the PI of the approved report.</p> <p>5. City Staff shall notify the RE or BI, as appropriate, of receipt of all Draft Monitoring Report submittals and approvals.</p> <p>B. Final Monitoring Report(s)</p> <p>1. The PI shall submit one copy of the approved Final Monitoring Report to the RE or BI as appropriate, and one copy to City Staff (even if negative), within 90 days after notification from City Staff that the draft report has been approved.</p> <p>2. The RE shall, in no case, issue the Notice of Completion until receiving a copy of the approved Final Monitoring Report from City Staff.</p>			

SIGNIFICANT IMPACT(S)	MITIGATION MEASURE(S)	IMPLEMENTATION TIME FRAME	IMPLEMENTATION RESPONSIBILITY	VERIFICATION RESPONSIBILITY
NOISE (NOI)				
Impact NOI-B.1: Noise generated by I-5 and highly traveled grid streets could cause interior noise levels in noise-sensitive uses (exclusive of residential and hotel uses) to exceed 45 dB(A). (Direct)	<i>Mitigation Measure NOI-B.1-1:</i> Prior to approval of a Building Permit for any residential, hospital, or hotel within 475 feet of the centerline of Interstate 5 or adjacent to a roadway carrying more than 7,000 ADT, an acoustical analysis shall be performed to confirm that architectural or other design features are included which would assure that noise levels within habitable rooms would not exceed 45 dB(A) CNEL.	Prior to Building Permit (Design) Prior to Certificate of Occupancy (Implementation)	Developer	CCDC/City

ATTACHMENT B

**GREENHOUSE GAS MODELING ASSUMPTIONS
JANUARY 2011**

Summary of GHG Emissions

	Existing Sources MT CO₂e/yr	Proposed MT CO₂e/yr	Net Increase MT CO₂e/yr
Mobile	2,476	1,797	-679
Electricity	627	567	-61
Natural Gas	123	252	129
Water	16	31	15
Waste	50	161	111
Total	3,292	2,807	-485

Appendix GHG Emissions Calculations

Energy¹

Electricity Emissions	Total KWh ²	MWh	Region	Emission Factor (lb CO2/MWh)	GWP	Emission Factor (lb CH4/MWh)	GWP	Emission Factor (lb N2O/MWh)	GWP	Total CO2e (Metric Tons/year)
Existing										
Office	1,863,810	1,864	CALI	739.05	1	0.0302	23	0.0081		298
Total										627
Proposed										
Office	543,390	543	CALI	739.05	1	0.0302	23	0.0081		296
Medical	266,696	267	CALI	739.05	1	0.0302	23	0.0081		90
Residential	873,360	873	CALI	739.05	1	0.0302	23	0.0081		296
Total										567

Natural Gas Emissions	Total Therms	MMBTU	Region	Emission Factor (kg CO2/MMBTU)	GWP	Emission Factor (kg CH4/MMBTU)	GWP	Emission Factor (kg N2O/MMBTU)	GWP	Total CO2e (Metric Tons/year)
Existing										
Office	23,166	2,317	California	53.06	1	0.005	23	0.0001		296
Total										123
Proposed										
Office	6,754	675	California	53.06	1	0.005	23	0.0001		296
Medical	10,336	1,034	California	53.06	1	0.005	23	0.0001		296
Residential	30,240	3,024	California	53.06	1	0.005	23	0.0001		296
Total										252

¹ California Climate Action Registry [CCAR] General Reporting Protocol v 3.1 January 2009

² California Energy Commission [CEC] 2006. California Commercial End Use Survey CEC-400-2006-005.

Water Use Emissions (Includes conveyance, treatment, distribution, and wastewater treatment)¹

	KWh/million gallons/year ^a	KWh/acre-ft/year	Gallons/Year	Total KWh	MWh	Region	Emission Factor (lb CO2/MWh)	GWP	Emission Factor (lb CH4/MWh)	GWP	Emission Factor (lb N2O/MWh)	GWP	Total CO2e (Metric Tons/year)
Existing													
Office ^b	12,700	4138	3,685,500	46,806		47 CALI	739.05	1	0.0302		23	0.0081	296
Total													16
Proposed													
Office ^b	12,700	4138	1,550,500	19,691		20 CALI	739.05	1	0.0302		23	0.0081	296
Residential ^c	12,700	4138	5,691,263	72,279		72 CALI	739.05	1	0.0302		23	0.0081	296
Total													31

Proposed office space assumed medical, basement, and subbasement (44,300 sf)

¹ California Energy Commission [CEC] 2007. California Energy - Water Relationship Staff Report CEC-999-2007-008. Available: <http://www.energy.ca.gov/2007publications/CEC-999-2007-008/CEC-999-2007-008.PDF>

^a Southern California

^b office use 35 gallons per square foot per year

^c residential use 69.3 gallons per capita per day

<http://www.waterresearchfoundation.org/research/topicsandprojects/execSum/241b.aspx>

Accessed December 13, 2010

<http://www.waterresearchfoundation.org/research/topicsandprojects/execSum/241.aspx>

Accessed December 13, 2010

Urbemis 2007 Version 9.2.4

Detail Report for Annual Operational Unmitigated Emissions (Tons/Year)

File Name: C:\Documents and Settings\laskowskic\Application Data\Urbemis\Version9a\Projects\CCDC_ConnectionsHousing_EXISTING_90.urb924

Project Name: connections housing

Project Location: Riverside County

On-Road Vehicle Emissions Based on: Version : Emfac2007 V2.3 Nov 1 2006

Off-Road Vehicle Emissions Based on: OFFROAD2007

OPERATIONAL EMISSION ESTIMATES (Annual Tons Per Year, Unmitigated)

Source	CO2
General office building	2,729.46
TOTALS (tons/year, unmitigated)	2,729.46

Does not include correction for passby trips

Does not include double counting adjustment for internal trips

Analysis Year: 2012 Season: Annual

Emfac: Version : Emfac2007 V2.3 Nov 1 2006

Summary of Land Uses

Land Use Type	Acreage	Trip Rate	Unit Type	No. Units	Total Trips	Total VMT
General office building		13.50	1000 sq ft	105.30	1,421.55	14,467.83
					1,421.55	14,467.83

Vehicle Fleet Mix

Vehicle Type	Percent Type	Non-Catalyst	Catalyst	Diesel
Light Auto	45.5	0.7	99.1	0.2

Vehicle Fleet Mix

Vehicle Type	Percent Type	Non-Catalyst	Catalyst	Diesel
Light Truck < 3750 lbs	9.5	1.1	93.6	5.3
Light Truck 3751-5750 lbs	21.9	0.5	99.5	0.0
Med Truck 5751-8500 lbs	12.1	0.8	99.2	0.0
Lite-Heavy Truck 8501-10,000 lbs	1.9	0.0	78.9	21.1
Lite-Heavy Truck 10,001-14,000 lbs	0.6	0.0	50.0	50.0
Med-Heavy Truck 14,001-33,000 lbs	0.8	0.0	12.5	87.5
Heavy-Heavy Truck 33,001-60,000 lbs	1.5	0.0	0.0	100.0
Other Bus	0.1	0.0	0.0	100.0
Urban Bus	0.0	0.0	0.0	0.0
Motorcycle	4.5	57.8	42.2	0.0
School Bus	0.1	0.0	0.0	100.0
Motor Home	1.5	0.0	86.7	13.3

Travel Conditions

	Residential			Commercial		
	Home-Work	Home-Shop	Home-Other	Commute	Non-Work	Customer
Urban Trip Length (miles)	12.7	7.0	9.5	13.3	7.4	8.9
Rural Trip Length (miles)	17.6	12.1	14.9	15.4	9.6	12.6
Trip speeds (mph)	30.0	30.0	30.0	30.0	30.0	30.0
% of Trips - Residential	32.9	18.0	49.1			

% of Trips - Commercial (by land use)

Travel Conditions

	Residential			Commercial		
	Home-Work	Home-Shop	Home-Other	Commute	Non-Work	Customer
General office building				35.0	17.5	47.5

Operational Changes to Defaults

Urbemis 2007 Version 9.2.4

Detail Report for Annual Operational Unmitigated Emissions (Tons/Year)

File Name: C:\Documents and Settings\laskowskic\Application Data\Urbemis\Version9a\Projects\CCDC_ConnectionsHousing_PROPOSED.urb924

Project Name: connections housing

Project Location: Riverside County

On-Road Vehicle Emissions Based on: Version : Emfac2007 V2.3 Nov 1 2006

Off-Road Vehicle Emissions Based on: OFFROAD2007

OPERATIONAL EMISSION ESTIMATES (Annual Tons Per Year, Unmitigated)

<u>Source</u>	<u>CO2</u>
General office building	731.44
Hospital	427.51
Transitional Beds - Homeless Shelter	505.75
SRO - Studios and Manager's Apartments	316.10
TOTALS (tons/year, unmitigated)	1,980.80

Does not include correction for passby trips

Does not include double counting adjustment for internal trips

Analysis Year: 2012 Season: Annual

Emfac: Version : Emfac2007 V2.3 Nov 1 2006

Summary of Land Uses

<u>Land Use Type</u>	<u>Acreage</u>	<u>Trip Rate</u>	<u>Unit Type</u>	<u>No. Units</u>	<u>Total Trips</u>	<u>Total VMT</u>
General office building		22.02	1000 sq ft	17.30	380.95	3,877.08

Summary of Land Uses

Land Use Type	Acreage	Trip Rate	Unit Type	No. Units	Total Trips	Total VMT
Hospital		17.00	1000 sq ft	13.60	231.20	2,268.65
Transitional Beds - Homeless Shelter		2.00	unknown	150.00	300.00	2,691.90
SRO - Studios and Manager's Apartments		2.50	unknown	75.00	187.50	1,682.44
					1,099.65	10,520.07

Vehicle Fleet Mix

Vehicle Type	Percent Type	Non-Catalyst	Catalyst	Diesel
Light Auto	45.5	0.7	99.1	0.2
Light Truck < 3750 lbs	9.5	1.1	93.6	5.3
Light Truck 3751-5750 lbs	21.9	0.5	99.5	0.0
Med Truck 5751-8500 lbs	12.1	0.8	99.2	0.0
Lite-Heavy Truck 8501-10,000 lbs	1.9	0.0	78.9	21.1
Lite-Heavy Truck 10,001-14,000 lbs	0.6	0.0	50.0	50.0
Med-Heavy Truck 14,001-33,000 lbs	0.8	0.0	12.5	87.5
Heavy-Heavy Truck 33,001-60,000 lbs	1.5	0.0	0.0	100.0
Other Bus	0.1	0.0	0.0	100.0
Urban Bus	0.0	0.0	0.0	0.0
Motorcycle	4.5	57.8	42.2	0.0
School Bus	0.1	0.0	0.0	100.0
Motor Home	1.5	0.0	86.7	13.3

Travel Conditions

	Residential			Commercial		
	Home-Work	Home-Shop	Home-Other	Commute	Non-Work	Customer
Urban Trip Length (miles)	12.7	7.0	9.5	13.3	7.4	8.9
Rural Trip Length (miles)	17.6	12.1	14.9	15.4	9.6	12.6
Trip speeds (mph)	30.0	30.0	30.0	30.0	30.0	30.0
% of Trips - Residential	32.9	18.0	49.1			
% of Trips - Commercial (by land use)						
General office building				35.0	17.5	47.5
Hospital				25.0	12.5	62.5
Transitional Beds - Homeless Shelter				2.0	1.0	97.0
SRO - Studios and Manager's Apartments				2.0	1.0	97.0

Operational Changes to Defaults

	Trip Rate	Unit Type	No. Units	Daily Total Trips	Daily Total VMT	Annual Short Tons CO2	Annual MT CO2
Vehicle Emissions							
Existing Land Use Type							
General office building	13.50 ^a	1000 sq ft	105.30	1,422	14,468	2,729	2,476
Total							2,476
Proposed Land Use Type							
General office building	22.02 ^b	1000 sq ft	17.30	381	3,877	731	663
Medical Clinic	17.00 ^c	1000 sq ft	13.60	231	2,269	428	388
Transitional Beds - Homeless Shelter	2.00 ^d	beds	150.00	300	2,692	506	459
SRO - Studios and Manager's Apartments	2.50 ^e	units	75.00	188	1,682	316	287
Total							1,797

Emissions modeled with EMFAC Version 2007 V2.3

Trip Rate Source: San Diego Municipal Code Land Development Code Trip Generation Manual 2003

^a Table 5 General Office Space >100,000 square feet

Square footage 117,000
 Occupancy rate 90%
 Formula 0.81 [Ln(T) = 0.756 Ln(x) + 3.95]
 ADT = 1422.01
 Trip rate 13.50 per 1,000 sf

^b Table 5 General Office Space <100,000 square feet

Square footage 17,300
 Occupancy rate 100%
 Formula 0.85 [Ln(T) = 0.756 Ln(x) + 3.95]
 ADT = 380.93
 Trip rate 22.02 per 1,000 sf

^c Table 5 Medical Office 17 per 1,000 sf

^d Table 7 Homeless Shelter 2 per bed

^e Table 7 SRO 2.5 per SRO

Waste Emissions

	lbs per year	tons per year	MT CO2e per year ^d
Existing			
Office ^a	230,607	115	50
Total			50
Proposed			
Office ^a	67,233	34	15
Medical ^b	293,760	147	64
Residential ^c	383,524	192	83
Total			161

Municipal solid waste composition from the CIWMB 2004 Statewide Waste Characterization Study, and reflect the year 2003.

^a 0.006 lb/sf/day <http://www.calrecycle.ca.gov/WASTECHAR/WasteGenRates/Commercial.htm>

^b 0.0108 tons/sf/yr <http://www.calrecycle.ca.gov/WASTECHAR/WasteGenRates/Institution.htm>

^c 4.67 lbs/person/day EPA 2008 Municipal Solid Waste in the United States: 2007 Facts and Figures, EPA530-R-08-010

^d Calculations based on EPA WARM model, shown below

Landfilled Waste (MT/year)	Existing		Proposed	
	Landfilled tons	MTCO2e	Landfilled tons	MTCO2e
Residential Waste Characterization*				
Mixed Garbage	5.3%	6	2.26	7.30
PCs	0.3%	0	0.01	0.04
Glass	4.0%	5	0.18	0.60
Ferrous (iron/steel)	4.6%	5	0.21	0.68
Plastic	8.8%	10	0.41	1.31
Organics (food waste)	45.0%	52	35.28	113.91
Mixed Paper	27.5%	32	12.05	38.90
C&D (Construction/Demolition waste)	4.5%	5	(0.57)	(1.84)
Total	100.0%	115	49.84	160.90

*commercial waste characterization assumed to be similar.

(Version 9.01, 3/09)

http://www.epa.gov/climatechange/wycd/waste/calculators/Warm_home.html#click

The emission factors presented in this table reflect national average landfill gas recovery practices and transportation distances.

Greenhouse Gas Emission Factors (MTCO2E per short ton)

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