THE CITY OF SAN DIEGO

ADDENDUM

Project No. 675101
Addendum to EIR No. 386029
SCH No. 2014051075

SUBJECT: **Euclid Terrace**: A NEIGHBORHOOD DEVELOPMENT PERMIT, SITE DEVELOPMENT PERMIT, and TENTATIVE MAP for the subdivision and development of 25 single-family residences with deviations to the minimum lot size and setbacks, maximum floor area ratio, and retaining wall height, and a wetland deviation on an existing vacant site located east of South Euclid Avenue and north of La Paz Drive. The 2.98-acre project site is within the Encanto Neighborhoods Community Plan and the Airport Influence Review Area 2 for San Diego International Airport. (Legal Description: A portion of Lot 43 of Las Alturas Villa Sites, In the City of San Diego, County of San Diego, State of California, According to Map thereof No. 501, filed in the office of the County Recorder of San Diego County on March 5, 1888; APN 5484302800). Applicant: Euclid San Diego LLC

I. SUMMARY OF PROPOSED PROJECT

The project is a Neighborhood Development Permit (NDP), Site Development Permit (SDP), and Tentative Map (TM) for the subdivision and development of 25 single-family residences and one open space lot on a 2.98-acre vacant site. The project includes a wetland deviation and qualifies to be processed under the Biologically Superior Option pursuant to the City's environmentally sensitive lands (ESL) wetland regulations (City of San Diego 2018; see discussion of Biological Resources below). The following additional deviations from the base zone development regulations are also proposed:

- Reduced lot area from 5,000 square feet required to 1,680 to 3,523 feet proposed.
- Reduced lot width from 50 feet required to 21 to 33 feet proposed.
- Reduced lot depth from 95 feet required to 75 to 84 feet proposed.
- Reduced street frontage from 50 feet required to 0 feet if private drive.
- Reduced front setback from 15 feet required to 10 feet proposed (lots 1–4).
- Reduced rear setback from 13 feet required to 5 feet proposed (lots 14–25).
- Reduced driveway length from 20 feet required to 10 feet proposed
- Reduced side setback from 4 feet required to 3 feet on one side of lots 1–13 and 0 feet on lots 14–25 proposed.
- Increase maximum building height from 30 feet required to 31 feet and 4 inches on lots 1-4 and 14-25.

As shown in Table 1, the project proposes the following deviations to maximum floor area ratio (FAR).

Table 1 Floor Area Ratio Deviations				
Lot Number	Lot Area (sf)	Building Area (sf)	Proposed FAR	Maximum FAR
1	2,563	2,258	0.88	0.70
2	2,574	2,258	0.88	0.70
3	2,475	2,258	0.91	0.70
4	2,475	2,258	0.91	0.70
5	3,019	2,079	0.69	0.65
6	2,805	2,079	0.74	0.70
7	2,805	2,079	0.74	0.70
8	2,805	2,079	0.74	0.70
9	3,524	2,079	0.59	0.65
10	2,772	2,079	0.75	0.70
11	2,772	2,079	0.75	0.70
12	2,722	2,079	0.75	0.70
13	3,072	2,079	0.68	0.65
14	1,680	2,177	1.30	0.70
15	1,680	2,177	1.30	0.70
16	1,680	2,177	1.30	0.70
17	1,680	2,177	1.30	0.70
18	1,680	2,177	1.30	0.70
19	1,680	2,177	1.30	0.70
20	1,680	2,177	1.30	0.70
21	1,680	2,177	1.30	0.70
22	1,680	2,177	1.30	0.70
23	1,680	2,177	1.30	0.70
24	1,680	2,177	1.30	0.70
25	1,680	2,177	1.30	0.70

In addition, the project proposes the following deviations related to retaining wall heights:

- A single retaining wall up to 12 feet high is proposed in the rear yard where the maximum required rear yard wall height is two 6-foot-high walls.
- A 12-foot-high retaining wall is additionally provided where the maximum wall height outside of required yards is 12 feet tall.

Retaining walls are proposed along the northern, eastern, and southern boundary of the site. Along the northern side, a retaining wall would separate the drainage area from the development area with heights ranging from 7 to 12 feet. The retaining wall along the easterly project boundary would be 4 to 12 feet tall, while the retaining wall along the southern project boundary, in the rear of lots 14 to 25, would range from 8 to 12 feet tall. Where proposed retaining walls are 6 feet high and greater, the landscape plan requires plantings to provide 80 percent screening of the wall within two years.

Access to the project site would be right-in, right-out from Euclid Avenue onto the proposed Sonia Circle, a private road. Sonia Circle incorporates a sidewalk on one side and the private road is designed with a hammerhead turnaround for fire access. To ensure pedestrian connectivity with the surrounding area, a decomposed granite trail is proposed that would provide access from Euclid Avenue, connecting through the site to the existing terminus of San Bernardo Terrace, a public road.

The project would install a public streetlight on Euclid Avenue and three private streetlights along Sonia Circle. Two fire hydrants are proposed with the project. A 2:1 slope would be constructed north of the biofiltration area, and a masonry wall would be constructed north of the proposed trail.

The project site is undeveloped, but existing public utilities are located within the surrounding roadways. The project would connect to an existing 10-inch sewer main located at the intersection of Euclid Place and Euclid Avenue and a 12-inch water pipe in Euclid Avenue. Existing on-site drainage is within four drainage basins with runoff flowing east to west. The project would install one biofiltration basin for water quality, hydromodification, and peak flow detention in the northern portion of the project site. A Modular Wetland System (MWS) would be installed to treat run-off from the drainage basin that cannot hydrologically connect to the biofiltration basin. The project would also introduce an underground system of storm drainpipes and inlets to convey runoff from east to west.

The biofiltration area is proposed in the northern portion of the site. Drainage is provided to allow treated stormwater to flow into the drainage feature in the north portion of the site. Additionally, a 15-foot wetland buffer is provided between the edge of the drainage and the proposed retaining wall. Removal of the existing invasive, non-native vegetation within this buffer area is proposed and the area would be planted with low water use native plants and wetland trees.

Project grading would require 11,000 cubic yards of cut and 11,000 cubic yards of fill, resulting in no import or export. The maximum depth of cut slopes would be 11 feet from mass grade to finish grade, and the maximum height of fill slopes would be 11 feet from mass grade to finish grade.

The project proposes alternative compliance for brush management. Brush management zone 1 is accommodated on-site while a fire wall is provided instead of a brush management zone 2. All landscaping materials and irrigation within the project site would conform to the requirements of the City LDC Landscape Standards and the applicable sections of the City's Municipal Code (SDMC) Chapter 14, Article 2, Division 4: Landscape Regulations. The landscape plans show trees along the back of sidewalk, between the existing trees to achieve 50 percent shade coverage of the Throughway Zone along the Euclid Avenue project frontage. The landscape plan would consist of natural, drought-tolerant plant palette. Figure 1 presents the regional location of the project; Figure 2 presents the project location on a U.S. Geological Survey (USGS) map; Figure 3 presents the project location on a City 800-scale map; Figure 4 presents the project location on an aerial photograph; and Figure 5 presents the proposed site plan.

II. ENVIRONMENTAL SETTING

The 2.98-acre project site is currently undeveloped, surrounded by single-family residential development, and is not within or adjacent to the City Multi-Habitat Planning Area (MHPA). Three

sensitive vegetation communities including non-native grassland, disturbed riparian, and disturbed wetland were identified within the project site.

The project site is located in a vehicle miles traveled (VMT) efficient area based on the screening maps provide by the San Diego Association of Governments (SANDAG). SANDAG reports that the project area generates 84.5 percent of the regional average VMT per capita, which is more than 15 percent below the regional average.

As previously stated, the project site is within the Encanto Neighborhoods community planning area and is zoned Residential - Single Unit 1-7 (RS-1-7). Additionally, the project site is located within the San Diego International Airport (SDIA) Land Use Compatibility Overlay Zone, Airport Influence Area (Review Area 2-San Diego International Airport), Complete Communities Mobility Choices Mobility Zone 2, Parking Standards Transit Priority Area, and Transit Priority Area.

III. SUMMARY OF ORIGINAL PROJECT (2015)

The Southeastern San Diego (SESD) Community Plan was adopted in 1969 and comprehensively updated in 1987. In 2015, the City of San Diego (City) again updated the SESD Community Plan; the 2015 update split the community plan area into two planning areas: the Southeastern San Diego and the Encanto Neighborhoods communities. The community planning areas are located adjacent to each other, south of the State Route 94 (SR-94), and individually bordered by Interstate 805 (I-805). The community plan update project (hereafter referred to as the 2015 CPUs) enabled greater focus on each community and while two separate community plans were prepared, the 2015 CPUs were analyzed under the California Environmental Quality Act (CEQA) collectively in the Southeastern San Diego and Encanto Neighborhoods Community Plan Updates Project Final Program Environmental Impact Report (Project No. 386029; SCH No. 2014051075) (hereinafter referred to as the CPUs Final PEIR). The 2015 CPUs were approved and the CPUs Final PEIR was certified by the San Diego City Council on December 2, 2015, Resolution No. R-310077.

The 2015 CPUs included an update to the existing SESD Community Plan, adoption of the Encanto Neighborhoods Community Plan, adoption of the SESD Community Plan, adoption of the General Plan Amendment, adoption of the Encanto Neighborhoods Impact Fee Study (IFS), adoption of the Southeastern San Diego IFS, repeal of the SESD Planned District Ordinance, repeal of the Mt. Hope Planned District Ordinance, adoption of the Rezone Ordinance comprised of current Citywide zones and three new zones into the Land Development Code (LDC; CO-2-1, CN-1-4, and IP-3-1), and adoption of a new Community Plan Implementation Overlay Zone (CPIOZ), Type-A, to apply to the Village Districts.

The 2015 CPUs provide for a mix of uses and development intensity that supports transit use within each of the designated community village areas. The 2015 CPUs focus on promoting transit-oriented development, identifying the provision of additional public services and facilities in accordance with City standards, and maintaining and enhancing the character of single-family areas over the next 20 to 30 years. The Land Use elements of each CPU define Village Districts and key corridors where future growth is targeted within both communities in order to fulfill the General Plan's City of Villages strategy (City of San Diego 2015).

In accordance with CEQA Guidelines Section 15168, the CPUs Final PEIR examined the environmental impacts of the CPUs. The CPUs Final PEIR concluded that the project would result in significant and unavoidable environmental impacts to transportation (programmatic level), air quality (conflict with air quality plan and contribute to the existing air quality violation), and noise (exceed General Plan standards, increase ambient noise levels). The following issue areas were determined to be significant but mitigated to below a level of significance with mitigation: land use, transportation (project level), air quality (sensitive receptors), noise (exposure above Noise Ordinance standards), biology, hydrology/water quality, historical resources, paleontological resources, and geological resources. All other impacts analyzed in the CPUs Final PEIR were determined to be less than significant.

The CPUs Final PEIR provides a basis for the review of subsequent development projects and public improvements proposed within the CPU areas. Subsequent environmental documents may be tiered from the CPUs Final PEIR (City of San Diego 2015).

The proposed project is located within the Encanto Neighborhoods Community Plan. As established by the 2015 land use plan, the project site is designated Residential – Low, which provides for both single- and multi-family housing with a low density range of 5-9 dwelling units per acre (see Figure 3.3-2 and Table 3.3-1; City of San Diego 2015). The project site is zoned as RS-1-7 (Residential – Single Family) in the Encanto Neighborhoods Community Plan (see Figure 3.7-2; City of San Diego 2015). RS-1-7 requires minimum 5,000-square-foot lots. The project site is not located within the Encanto Neighborhoods CPIOZ-Village District.

IV. ENVIRONMENTAL DETERMINATION

The City previously prepared and certified the CPUs Final PEIR (Project No. 386029; SCH No. 2014051075) per Resolution No. R-310077on December 2, 2015. Based on all available information in light of the entire record, the analysis in this Addendum, and pursuant to Section 15162 and 15164 of the State CEQA Guidelines that:

- There are no substantial changes proposed in the project which will require major revisions of the previous environmental document due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

- Substantial changes have not occurred with respect to the circumstances under which the project is undertaken which will require major revisions of the previous environmental document due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

- There is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous environmental document was certified as complete or was adopted, shows any of the following:

    a. The project will have one or more significant effects not discussed in the previous environmental document;

b. Significant effects previously examined will be substantially more severe than shown in the previous environmental document;

c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or

d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous environmental documents would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

Based upon a review of the current project, none of the situations described in Sections 15162 and 15164 of the State CEQA Guidelines apply. No changes in circumstances have occurred, and no new information of substantial importance has manifested, which would result in new significant or substantially increased adverse impacts as a result of the project. Therefore, this Addendum has been prepared in accordance with Section 15164 of the CEQA State Guidelines. The CPUs Final PEIR has been incorporated by reference pursuant to CEQA Guidelines Section 15150. Public review of this Addendum is not required per the CEQA.

V. IMPACT ANALYSIS

This Addendum includes the environmental issues analyzed in detail in the previously certified CPUs Final PEIR as well as the project-specific environmental analysis pursuant to the CEQA. The analysis in this document evaluates the adequacy of the CPUs Final PEIR relative to the project and documents that the proposed modifications and/or refinements would not cause new or more severe significant impacts than those identified in the previously certified environmental document.

The CPUs Final PEIR identified significant and unavoidable impacts related to transportation, air quality, and noise. The following issue areas were determined to be significant but mitigated to below a level of significance with mitigation: land use, biology, hydrology/water quality, historical resources, paleontological resources, and geology and seismic hazards. With respect to cumulative impacts, implementation of the CPUs would result in significant impacts to transportation, air quality, and noise, which would remain significant and unmitigable.

An overview of the project's impacts in relation to the previously certified CPUs Final PEIR is provided in Table 2, Impact Assessment Summary. The following analysis indicates there would be no new significant impacts, nor would there be an increase in the severity of impacts resulting from the project. Further, there is no new information in the record or otherwise available indicating that there are substantial changes in circumstances that would require major changes to the CPUs Final PEIR. A comparison of the project's impacts related to those of the certified CPUs Final PEIR is provided below in Table 2.

Table 2 Impact Assessment Summary					
Environmental Issues	CPUs Final PEIR Finding Analysis	CPUs Mitigation	Project	Project Level New Mitigation?	Project Resultant Impact
Land Use	Significant but mitigated	Yes	No new impacts	No	Less than Significant
Transportation	Significant and Unavoidable	Yes	No new impacts	No	Less than Significant
Air Quality	Significant and Unavoidable	Yes	No new impacts	No	Less than Significant
Noise	Significant and Unavoidable	Yes	No new impacts	No	Less than Significant
Biological Resources	Significant, but mitigated	Yes	No new impacts	Yes, consistent with CPUs Final PEIR mitigation framework	Mitigated to a level Less than Significant
Hydrology and Water Quality	Significant, but mitigated	Yes	No new impacts	No	Less than Significant
Historical Resources	Significant but mitigated	Yes	No new impacts	No	Less than Significant
Paleontological Resources	Significant but mitigated	Yes	No new impacts	Yes, consistent with CPUs Final PEIR mitigation framework	Mitigated to a level Less than Significant
Geology and Seismic Hazards	Significant but mitigated	Yes	No new impacts	No	Less than Significant
Hazardous Materials	Less than Significant	No	No new impacts	No	Less than Significant
Greenhouse Gas Emissions	Less than Significant	No	No new impacts	No	Less than Significant
Energy	Less than Significant	No	No new impacts	No	Less than Significant
Public Services and Facilities	Less than significant	No	No new impacts	No	Less than Significant
Public Utilities	Less than Significant	No	No new impacts	No	Less than Significant
Visual Effects and Neighborhood Character	Less than Significant	No	No new impacts	No	Less than Significant

Land Use

CPUs Final PEIR

Land Use is discussed in Section 5.1 of the CPUs Final PEIR and concluded that implementation of the CPUs would result in significant, but mitigated impacts related to conflicts with applicable local and regional land use plans.

The CPUs Final PEIR identified that implementation of the CPUs would result in potential impacts to ESL and historical resources associated with future development. Implementation of CPUs Final PEIR mitigation framework LU-1a and LU-1b would reduce impacts to ESL and historical resources to a

level less than significant. Future projects would be required to comply with ESL and historical resources regulations, the CPUs policies, mitigation framework, and the City's Biology and Historical Resources Guidelines. Additionally, all future projects would require subsequent environmental review and compliance with established development regulations, guidelines, and mitigation framework which would serve to reduce impacts to below a level of significant at the program-level. Therefore, the program-level environmental impacts related to CPU conflicts with the ESL and HRR regulations would be mitigated to a level less than significant.

The CPUs Final PEIR identified that impacts on MHPA lands within Encanto Neighborhoods CPU area would be significant. Compliance with established development standards and regulations, along with implementation of CPUs Final PEIR mitigation framework LU-2 would serve to reduce impacts on MHPA lands at the program level to below a level less than significant.

Project

The project site consists of undeveloped land within the Encanto Neighborhoods Community Plan and is designated as Residential – Low, which allows for 5-9 dwelling units/acre. The project site is zoned as RS-1-7 (Residential – Single Family) in the Encanto Neighborhoods Community Plan. Development of the proposed 25 single-family residential units would be consistent with the existing land use and zoning designations. The proposed residential project would be consistent with surrounding residential development and would obtain access from an existing public road, Euclid Avenue. Therefore, the project would not divide an established community, and impacts would be less than significant.

The required permits for this project are a Neighborhood Development Permit (Process 2), in accordance with SDMC Section 126.0603 where development is consistent with affordable housing, in-fill projects, and or sustainable buildings regulations. The project is considered an in-fill project pursuant to SDMC Section 143.0915(b) for residential development within the Sustainable Development Area. The Site Development Permit (Process 4) is in accordance with SDMC Section 126.0502(d)(3) where subdivision of a premises that contains ESL as described in Section 143.0110. The project premises contains ESLs in the form of biologically sensitive resources with non-native grasslands. The Tentative Map (Process 4) is in accordance with SDMC Section 125.0430 for tentative final maps for the proposed subdivision of the existing vacant lot into 25 lots (25 residential lots and 1 common lot area).

The project proposes deviations to development regulations such as the reduction of lot area, lot width, lot depth, setbacks, street frontage, and driveway length. The project also proposes deviations to increase the maximum structure height and floor area ratio. The proposed deviations in reduction of lot area (5,000 square feet required to 1,680-3,523 square feet proposed), reduction of lot width (50 feet required to 21-33 feet proposed), reduction of lot depth (95 feet required to 75-84 feet proposed), and reduction of setbacks (15 feet required front setback to 10 feet, 13 feet required rear yard setback to 5 feet, and 4 feet required side yard setback to 3 feet for Lots 1-13 and 0 feet for Lots 14-25) are requested in order to create smaller lot sizes and provide attached family housing that cluster away from the existing hillside, existing sensitive biological resources, and existing noise from Euclid Avenue. The small lot sizes are also proposed to reduce overall grading into the existing hillside.

The proposed deviation to a reduced street frontage (50 feet required to 0 proposed) is in the form of a private drive (Sonia Circle). The purpose of the private drive is due to the unique existing shape of the existing site where existing street frontage would only accommodate three standard dwelling units on a lot that has the capacity to be developed up to 26 single family dwelling units. The private drive allows vehicular access through the site whilst providing more dwelling units to achieve the housing needs of the community.

The project proposes a deviation to the maximum structure height of 30 feet to 31 feet and 4 inches for structures on Lots 1-4 and 14-25 in the form of three-story dwelling units. The purpose of the proposed structure height deviation to reduce building footprint by building vertically rather than horizontally to minimize grading into the existing hillside.

The project proposes a deviation to FAR for each new residential lot in the RS-1-7 zone, which currently the FAR is dependent on lot area. The purpose of the proposed FAR deviation on each individual lot is to minimize lot grading on the existing hillside and to allow for residential lot clustering to address the necessary housing needs of the community. With approval of proposed deviations, the proposed project would be consistent with the existing zoning designation.

The purpose of the ESL Regulations (LDC Sections 143.0101–143.0160) is to protect, preserve, and, where damaged, restore environmentally sensitive lands and the viability of the species supported by those lands. The ESL Regulations apply to all proposed development when environmentally sensitive lands, including sensitive biological resources, steep hillsides, floodplains, or coastal bluffs, are present. The project site does not include steep hillsides, coastal bluffs and is not located within the 100-year floodplain. The project would not conflict with any applicable habitat conservation plan or natural community conservation plan. In addition, the project includes a wetland deviation and qualifies to be processed under the Biologically Superior Option pursuant to the City's ESL wetland regulations (City of San Diego 2018; see discussion of Biological Resources below). Further, the project would not conflict with the City's Multiple Species Conservation Plan (MSCP), because the site is not located within or adjacent to the MHPA. As discussed in the Biological Resources Report prepared by RECON Environmental, Inc. (RECON; 2022a), the project site does contain ESL due to the presence of sensitive biological resources and could impact MSCP-covered species. Impacts would be mitigated through habitat-based mitigation, (i.e., no species-specific mitigation needed). As described in the project analysis of biological resources below, the project would implement mitigation measures BIO-1 and BIO-2, as detailed in the project's Mitigation Monitoring Reporting Program (MMRP), to reduce impacts to a level less than significant. These mitigation measures are consistent with CPUs Final PEIR mitigation framework. Therefore, the project would be consistent with the City's ESL Regulations.

The purpose of the City's Historical Resources Regulations, found in Section 143.0251 of the LDC, is to protect, preserve, and, where damaged, restore the historical resources of San Diego, which include historical buildings, historical structures or objects, important archaeological sites, historical districts, historical landscapes, and traditional cultural properties. As described in the discussion of potential impact to historical resources below, there are no historic buildings, structures, or objects on the project site, and the Native American Heritage Commission (NAHC) records search of their Sacred Lands File was negative. Therefore, the project would be consistent with the City's Historical Resources Regulations.

Review of the San Diego International Airport, Airport Land Use Compatibility Plan (ALUCP) Exhibit 2-1 Noise Contour Map determined that the project site is located outside of the noise contour area and, therefore, would not be exposed to aircraft noise. Exhibit 1-1 Airport Influence Area, shows the project site located within Airport Influence Area - Review Area 2 for the San Diego International Airport. The project buildings would not exceed applicable height limits for this zone and would not create a hazard related to air navigation. Therefore, project land uses would be compatible with the applicable airport compatibility plan, and impacts would be less than significant.

The project is consistent with all relevant General Plan and CPU policies, in addition to the City's ESL regulations, Historic Resources Regulations, and the SDIA ALCUP. Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the CPUs Final PEIR. The project would not result in a new significant impact, nor would a substantial increase in the severity of impacts from that described in the CPUs Final PEIR result.

Transportation

CPUs Final PEIR

Section 5.2 of the CPUs Final PEIR provides an analysis of transportation/circulation impacts associated with the CPUs. The CPUs Final PEIR determined that impacts to the circulation system would be significant and unavoidable. Specifically, a total of 67 roadway segments would be expected to operate at unacceptable levels under buildout of the CPUs, resulting in significant roadway segment impacts. A total of 10 intersections would be expected to operate at unacceptable levels at the AM and/or PM peak hour, resulting in significant intersection impacts. The CPUs Final PEIR mitigation framework stated that at the program level, impacts shall be reduced through the classifications of roadways and necessary roadway, intersection, and freeway improvements. Mitigation or construction of these improvements shall be carried out at the project-level via the IFS, capital improvement program projects, future California Department of Transportation (Caltrans) projects, and future development projects. Funding shall be through construction by individual development projects, collection of development impact fees (DIFs), fair- share contributions to be determined at the project-level, and potentially other sources, such as Local TransNet funds and federal, state, and regional grant funding programs. The CPUs Final PEIR determined that the City shall implement all policies identified in the Mobility Element to reduce the demand for vehicles on the City's transportation system; CPU policies from both Southeastern San Diego and Encanto Neighborhoods P-MO-16, P-MO-17, P-MO-19, P-MO-21, P-MO-22, P-MO-23, P-MO-24, P-MO-25, P-MO-26, P-MO-27, and P-MO-28 would apply. However, as identified above, even with implementation of these policies, the impacts would remain significant and unavoidable.

The CPUs Final PEIR determined that impacts on both the regional and local existing transportation system would be significant and unavoidable. The CPUs Final PEIR determined that the City shall implement all policies identified in the Mobility Element (see above) to reduce the demand for vehicles on the local and regional transportation system. However, even with implementation of these policies, the impacts to existing and planned transportation systems including I-5, I-15, I-805, and SR-94 would remain significant and unavoidable at the program level.

The CPUs Final PEIR noted that at the project-level, partial mitigation may be possible in the form of transportation demand management measures that encourage carpooling and other alternate

modes of transportation. At the time future subsequent development projects are proposed, project-specific traffic analyses would contain detailed recommendations.

Complete Communities: Housing Solutions and Mobility Choices EIR

Senate Bill (SB) 743, which became effective July 1, 2020, was signed into law in 2013 with the intent to better align CEQA practices with statewide sustainability goals related to efficient land use, greater multi-modal choices, and GHG reductions and updated how transportation impacts are evaluated under CEQA. CEQA Guidelines Section 10564.3, enacted pursuant to SB 743, was adopted in December 2018, and became effective in the city of San Diego July 1, 2020. The amended section identifies VMT as the appropriate metric for measuring transportation impacts along with the elimination of auto delay/level of service (LOS) for CEQA purposes statewide. Since SB 743 became effective in the city of San Diego after the approved entitlements, VMT was not used as the performance metric in the 2019 Transportation Impact Analysis or Addendum. Currently, the City's CEQA Guidelines require examination of whether a project would result in VMT exceeding thresholds identified in the City's Transportation Study Manual.

In order to implement SB 743, the City adopted the Mobility Choices Program. The Mobility Choices Program was evaluated as part of the City's Complete Communities: Housing Solutions and Mobility Choices PEIR. The purpose of the Mobility Choices Program is to implement SB 743 by ensuring that new development mitigates transportation VMT impacts to the extent feasible, while incentivizing development within the City's Transit Priority Areas (TPAs) and urban areas. The Mobility Choices regulations included amendments to the City's SDMC and Land Development Manual to support implementation of the program in addition to adoption of a new CEQA significance threshold for transportation that implements SB 743. The Complete Communities: Housing Solutions and Mobility Choices PEIR found that implementation of the Mobility Choices Program and associated updates to the LDC to implement a new threshold for VMT impacts would not be associated with increases in per capita VMT. Rather, implementation of the Mobility Choices Program would support reductions in per capita VMT by either requiring the construction of, or funding for, transportation infrastructure and amenities within Mobility Zones 1 and 2 (e.g., Downtown or in a TPA) that would encourage non-vehicular travel. The Complete Communities: Housing Solutions and Mobility Choices PEIR found that implementation of the Mobility Choices program and the new significance threshold for transportation impacts, would result in VMT impacts for any new development that occurs in an area that generates resident VMT per capita or employee VMT per employee that is greater than 85 percent of the base year regional average, absent any mitigation. While the Mobility Choices Program regulations were intended to serve as mitigation to ensure an overall reduction in citywide VMT, the PEIR did not conclude that all potential VMT impacts would be fully mitigated because at a program level of analysis it could not be determined with certainty whether the improvements associated with program implementation would fully mitigate VMT impacts at the project level.

Although the Mobility Choices Program is anticipated to result in the implementation of infrastructure improvements that could result in per capita VMT reductions, at a program level, the PEIR found that potentially significant VMT impacts could nonetheless remain significant because it could not be determined with certainty whether the improvements would be implemented at the time a future development project's VMT impacts could occur and whether those impacts would be

mitigated to a less than significant level. The analysis for this issue was cumulative in nature, accordingly, cumulative impacts related to VMT would also be significant.

The City's Complete Communities: Housing Solutions and Mobility Choices PEIR evaluated, among other things, the environmental impacts of adoption of the City's Complete Communities: Mobility Choices (Mobility Choices Program). The Mobility Choices Program included adoption of Ordinance Number O-21274, on December 9, 2020. The Mobility Choices regulations included the identification of Mobility Zones, VMT Reduction Measures as outlined in SDMC Section 143.1103(b) and Land Development Manual Appendix T, and an Active Transportation In-Lieu Fee to be used to mitigate VMT impacts from new development in VMT inefficient areas by collecting funds for implementation of active transportation improvements in VMT efficient areas.

Project

The project is consistent with the land use/zoning and would not result in additional trips beyond that identified in the CPUs Final PEIR. Since certification of the CPUs Final PEIR, SB 743, which became effective July 1, 2020, updated how transportation impacts are evaluated under CEQA. Specifically, Public Resources Code Section 20199, enacted pursuant to SB 743, identifies VMT as the appropriate metric for measuring transportation impacts along with the elimination of auto delay/level of service (LOS) for CEQA purposes statewide. Since SB 743 became effective after the approved entitlements, VMT was not discussed in the 2017 CPMP SEIR. Currently, the City's CEQA Guidelines require a discussion in relation to whether a project would result in VMT exceeding thresholds identified in the City of San Diego Transportation Study Manual (TSM). To address VMT, Urban Systems Associates, Inc. (USAI) prepared a VMT Assessment Memorandum for the project. The Memorandum was prepared in accordance with the City of San Diego's Transportation Study Manual (September 2020) requirements, which are consistent with CEQA.

The proposed project was evaluated under the City's Transportation Study Manual VMT Screening Criteria for land development projects and it was determined the project satisfies the Small Project screening criterion outlined in the City of San Diego Transportation Study Manual. Based upon the information provided in the VMT Assessment Memorandum, the project is determined to be screened out from additional VMT analysis. Therefore, the Project is presumed to have a less than significant VMT impact.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the CPUs Final PEIR. The project would not result in a new significant impact, nor would a substantial increase in the severity of impacts from that described in the CPUs Final PEIR occur.

Air Quality

CPUs Final PEIR

Section 5.3 of the CPUs Final PEIR provides an analysis of air quality impacts associated with the CPUs.

Air Quality Plans

The CPUs Final PEIR determined that total emissions under the Encanto Neighborhoods CPU are projected to be greater than total emissions under the Adopted Community Plan for reactive organic gases (ROG), oxides of nitrogen (NOx), and carbon monoxide (CO). Thus, emissions of these pollutants would be greater than what is accounted for in adopted regional air quality improvement plans. Therefore, even with the implementation of CPU policies, the Encanto Neighborhoods CPU would result in a significant impact associated with conflicts with implementation of the Regional Air Quality Standards (RAQS). Because the significant air impact stems from an inconsistency between the Encanto Neighborhoods CPU and the adopted land use plans upon which the RAQS was based, the only measure that can lessen this effect is the revision of the RAQS and SIP based on the revised CPUs. This effort is the responsibility of SANDAG and the San Diego Air Pollution Control District (SDAPCD) and is outside the jurisdiction of the City. With no mitigation available to the City, impacts remain significant and unavoidable.

Construction and Operational Emissions

The CPUs Final PEIR determined that approval of future projects that conform to the Encanto Neighborhoods CPU could contribute to cumulatively considerable emissions if multiple projects are implemented simultaneously. In general, implementation of the policies in the CPU and General Plan would preclude or reduce air quality impacts. However, it is possible that for certain projects, adherence to the regulations may not adequately protect air quality, and such projects would require additional measures to avoid or reduce significant air quality impacts. Because specific development plans associated with future development were not available at the program level, it was determined that construction activities under the Encanto Neighborhoods CPU would have a potentially significant impact on local air quality without mitigation. Additionally, operational emissions of land uses proposed under the Encanto Neighborhoods CPU could potentially contribute to regional violations. Therefore, development under the CPU could contribute substantially to an existing air quality violation.

The CPUs Final PEIR describes that mitigation framework AQ-1 and AQ-2 shall be implemented to reduce project-level impacts. Notwithstanding the identification of mitigation, because no project level air emission data was available at the program level, it was determined that impacts would remain significant and unavoidable. These measures shall be updated, expanded, and refined when applied to specific future projects based on project-specific design and changes in existing conditions, and local, state, and federal laws.

CO Hot Spots

The CPUs Final PEIR hot spot analysis indicated that the increases of CO due to adoption of the Encanto Neighborhoods CPU would be below the federal and state 1-hour standard. Based on this calculation, increases of CO due to the CPU would be below the federal and state 8-hour standards. Therefore, there would be no harmful concentrations of CO, and localized pollutant emissions would not exceed applicable standards under either under either the adopted community plan or the Encanto Neighborhoods CPU.

Mobile Source Emissions

The CPUs Final PEIR determined with a modeling analysis that chronic risks resulting from diesel particulate matter emissions associated with the vehicles operating within and adjacent to the CPU areas are not projected to be significant within the Encanto Neighborhoods CPU area.

Stationary Source Emissions

The CPUs Final PEIR determined that the Encanto Neighborhoods CPU area is heavily developed, and it can be assumed that it would experience relatively small projects in terms of land area, most of which would involve the demolition of existing structures and improvements. As no project-specific data are available at this time, air emissions associated with planned industrial uses would represent a significant adverse air quality impact. The CPUs Final PEIR describes that mitigation framework AQ-3 and AQ-4 would require project-level review to demonstrate that health risks would be below a level of significance for all future projects. Thus, impacts from all future projects implemented in accordance with the Encanto Neighborhoods CPU would be below a level of significance.

Project

Project-specific construction and operational air emissions were calculated using the California Emissions Estimator Model (CalEEMod; RECON 2022b) to assess potential air quality impacts consistent with the CPUs Final PEIR mitigation framework.

Air Quality Plans

The RAQS is the applicable regional air quality plan that sets forth the SDAPCD's strategies for achieving the National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS). The San Diego Air Board is designated non-attainment for the federal and state ozone standard. Accordingly, the RAQS was developed to identify feasible emission control measures and provide expeditious progress toward attaining the standards for ozone (O_3). The growth projections used by the SDAPCD to develop the RAQS emissions budgets are based on the population, vehicle trends, and land use plans developed in general plans and used by SANDAG in the development of the regional transportation plans and sustainable communities strategy. As such, projects that propose development that is consistent with the growth anticipated by SANDAG's growth projections and/or the general plan would not conflict with the RAQS. The project site is designated as Residential – Low in the Encanto Neighborhoods CPU, which allows for 5-9 dwelling units/acre, and is zoned as RS-1-7 (Residential – Single Family). The project would be consistent with

the existing land use and zoning designations. Therefore, the project would be consistent with the growth projections and would not conflict with implementation of the RAQS.

Project Emissions

Short-Term (Construction) Emissions

Construction-related activities are temporary, short-term sources of air emissions. Sources of construction-related emissions include fugitive dust from grading activities, equipment exhaust, trips, and power consumption. Consistent with CPUs Final PEIR mitigation framework AQ-1, a project-specific analysis of daily construction emissions was prepared for the project. Construction emissions for the project were modeled assuming that construction would begin in 2023 and last for approximately one year. Primary inputs are the numbers of each piece of equipment and the length of each construction stage. Specific construction phasing and equipment parameters are not available at this time. However, CalEEMod can estimate the required construction equipment when project-specific information is unavailable. The estimates are based on surveys, performed by the South Coast Air Quality Management District and the Sacramento Metropolitan Air Quality Management District, of typical construction projects which provide a basis for scaling equipment needs and schedule with a project's size. Air emission estimates in CalEEMod are based on the duration of construction phases; construction equipment type, quantity, and usage; grading area; season; and ambient temperature, among other parameters. Table 3 shows the total projected construction maximum daily emission levels for each criteria pollutant (RECON 2022b).

Table 3
Summary of Worst-case Construction Emissions
(pounds per day)

Construction	Pollutant					
	ROG	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Site Preparation	1	14	10	<1	2	1
Grading	1	14	9	<1	8	4
Building Construction	2	14	15	<1	1	1
Paving	1	8	12	<1	1	<1
Architectural Coatings	29	1	2	<1	<1	<1
Maximum Daily Emissions	**29**	**14**	**15**	**<1**	**8**	**4**
Significance Threshold	*137*	*250*	*550*	*250*	*100*	*67*

SOURCE: RECON 2022b.
ROG = reactive organic gases; NO_X = oxides of nitrogen; CO = carbon monoxide; SO_X = oxides of sulfur; PM_{10} = particulate matter with an aerodynamic diameter of 10 microns or less; $PM_{2.5}$ = particulate matter with an aerodynamic diameter of 2.5 microns or less

Standard dust control measures would be implemented as a part of project construction in accordance with SDAPCD rules and regulations. Fugitive dust emissions were calculated using CalEEMod default values, which did not take into account the required dust control measures. Thus, the emissions shown in Table 3 are conservative. For assessing the significance of the air quality emissions resulting during construction of the project, the construction emissions were compared to the City significance thresholds shown in Table 3. As shown in Table 3, maximum daily construction emissions associated with the project are projected to be less than the applicable thresholds for all criteria pollutants. Construction-related air quality impacts would be less than significant, and

project construction would not result in emissions that would exceed the NAAQS or CAAQS, or contribute to existing violations, resulting in a less than significant impact. Also, the project would not result in the generation of 100 pounds per day or more of particulate matter. Standard dust control measures would be implemented as a part of project construction. Therefore, impacts would be less than significant.

Long-Term (Operational) Emissions

Consistent with the CPUs Final PEIR mitigation framework AQ-2, a project-specific analysis of operational air emissions was prepared for the project. Operations emissions generated by the project would come from area and energy sources (consumer products, landscape maintenance, architectural coatings, natural gas use, etc.), as well a mobile source (vehicle traffic). Based on a weekday trip generation rate of 10 trips per dwelling unit (SANDAG 2002), the project is anticipated to generate 250 daily weekday trips. Saturday and Sunday trip rates were calculated by proportionately adjusting the CalEEMod default weekend trip rates. The default trip length was used to model emissions associated with trips generated by the project. Table 4 provides a summary of the operational emissions generated by the project (RECON 2022b). As shown, project-generated emissions are projected to be less than the City's Significance Determination Thresholds (City of San Diego 2022) for all criteria pollutants. Therefore, project operation would not generate regional emissions that would exceed the NAAQS or CAAQS or contribute to existing violations, and impacts would be less than significant.

Table 4
Summary of Project Operational Emissions
(pounds per day)

Source	Pollutant					
	ROG	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Area Sources	1	<1	2	<1	<1	<1
Energy Sources	<1	<1	<1	<1	<1	<1
Mobile Sources	1	1	7	<1	2	<1
TOTAL	**2**	**1**	**9**	**<1**	**2**	**<1**
Significance Threshold	*137*	*250*	*550*	*250*	*100*	*67*

SOURCE: RECON 2022b.
NOTE: Totals may vary due to independent rounding.
ROG = reactive organic gases; NO_X = oxides of nitrogen; CO = carbon monoxide
SO_X = oxides of sulfur; PM_{10} = particulate matter with an aerodynamic diameter of 10 microns or less; $PM_{2.5}$ = particulate matter with an aerodynamic diameter of 2.5 microns or less

Sensitive Receptors

Sensitive receptors include schools and schoolyards, parks and playgrounds, daycare centers, nursing homes, hospitals, and residential communities. The project is surrounded by residential uses. Construction of the project would result in short-term diesel exhaust emissions from on-site heavy-duty equipment. Construction of the project would result in the generation of diesel exhaust diesel particulate matter (DPM) emissions from the use of off-road diesel equipment required for site grading, paving, and other construction activities and on-road diesel equipment used to bring materials to and from the project site. Generation of DPM from construction projects typically occurs in a single area for a short period. According to the Office of Environmental Health Hazard

Assessment (OEHHA), health risk assessments, which determine the exposure of sensitive receptors to toxic emissions, should be based on a 30-year exposure period; however, such assessments should be limited to the period/duration of activities associated with the project (OEHHA 2015). Thus, if the duration of proposed construction activities near any specific sensitive receptor were one year, the exposure would be three percent of the total exposure period used for health risk calculation. Based on the short duration of construction (one year), DPM generated by project construction is not expected to create conditions where the probability is greater than 10 in 1 million of contracting cancer for the maximally exposed individual or to generate ground-level concentrations of non-carcinogenic toxic air contaminants that exceed a hazard index greater than 1 for the maximally exposed individual. Additionally, with ongoing implementation of U.S. Environmental Protection Agency and California Air Resources Board (CARB) requirements for cleaner fuels; off-road diesel engine retrofits; and new, low-emission diesel engine types, the DPM emissions of individual equipment have been substantially reduced. Furthermore, the project would implement standard construction measures in order to comply with mandatory SDAPCD rules and regulations and CARB's In-Use Off-Road Diesel-Fueled Fleets Regulation. Construction would be short-term and construction emissions would be well less than applicable thresholds (see Table 3 above). Therefore, construction of the project would not expose sensitive receptors to substantial pollutant concentration, and impacts would be less than significant. Once operational, the project would not be a stationary source of DPM or any other toxic air contaminants. Therefore, operation of the project would not expose sensitive receptors to substantial levels of pollution, and impacts would be less than significant.

Stationary Source Emissions

CPU Final PEIR mitigation framework AQ-3 and AQ-4 require the preparation of a health risk assessment for projects that would emit toxic air contaminants or include the construction of stationary sources of emissions including distribution centers, chrome platers, dry cleaners using perchloroethylene, and gas stations. The project is a residential use and would not be a stationary source of emissions. Therefore, AQ-3 and AQ-4 do not apply to the project.

Odor

The project does not include any uses that are typically associated with odor complaints. The project does not propose any uses or activities that would result in potentially significant operational-source odor impacts. During construction, construction equipment may generate some nuisance odors. However, exposure to odors associated with project construction would be short term and temporary in nature. Further, per CARB's Airborne Toxic Control Measures 13 (California Code of Regulations Chapter 10 Section 2485), the applicant shall not allow idling time to exceed 5 minutes unless more time is required per engine manufacturers' specifications or for safety reasons. Therefore, the project is not expected to generate significant objectionable odors affecting a substantial number of people, and impacts would be less than significant.

The project would be required to adhere to all relevant General Plan and CPU policies, and has implemented the CPUs Final PEIR mitigation framework, including AQ-1 and AQ-2 which provided project-specific environmental review demonstrating that construction and operational air quality impacts would be less than significant. Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the PEIR. The project would not result in a

new significant impact, nor would a substantial increase in the severity of impacts from that described in the PEIR occur.

Noise

CPUs Final PEIR

Section 5.4 of the CPUs Final PEIR provides an analysis of noise impacts associated with the CPUs.

The CPUs Final PEIR determined that impacts associated with transportation noise levels would be potentially significant. As discussed in the CPUs Final PEIR, the City's process for the evaluation of discretionary projects includes environmental review and documentation pursuant to CEQA as well as an analysis of those projects for consistency with the goals, policies, and recommendations of the General Plan. However, it is possible that future development projects, adherence to the regulations may not adequately reduce noise levels, and such projects would require additional measures to comply with applicable standards. The CPUs Final PEIR mitigation framework included measures NOS-1 and NOS-2, which requires regulatory compliance and would ensure that impacts related to exterior and interior noise for new development are reduced; however, absent project level development plans there is no assurance that even with strict adherence to the mitigation framework, these impacts would be reduced to below a level of significance and therefore, the impacts, at the program level, remain significant and unavoidable.

The CPUs Final PEIR determined that impacts associated with aircraft noise would be less than significant, as the Encanto Neighborhoods CPU area is located entirely outside the 65 community noise equivalent level (CNEL) noise contour for the SDIA. Additionally, a majority of the CPU area is located outside the 60 CNEL contour. Future single-family homes would include noise attenuation consistent with the Noise Element of the General Plan and the ALUCP for the SDIA. Thus, impacts due to aircraft noise would be less than significant.

The CPUs Final PEIR determined that impacts associated with stationary source noise would be less than significant with mitigation. The CPUs Final PEIR mitigation framework included measure NOS-3, which requires preparation and submittal of a site-specific acoustical analysis to recommend site-specific noise attenuation measures. With adherence to mitigation framework NOS-3, the program-level impact related to stationary noise impacts to residential uses and sensitive receptors would be reduced to below a level of significance.

The CPUs Final PEIR determined that impacts associated with construction noise would be less than significant with mitigation. The CPUs Final PEIR mitigation framework included measure NOS-4, requiring the implementation of best construction management practices, including preparation of a project-specific Construction Noise Management Plan. With adherence to mitigation framework NOS-4, the program-level impact related to construction noise impacts to residential uses and sensitive receptors would be reduced to below a level of significance.

Project

Consistent with the CPUs Final PEIR mitigation framework, a site-specific Noise Analysis was prepared by RECON (RECON 2022c). The primary noise source in the vicinity of the project site is

vehicular traffic on adjacent and nearby roadways. Other existing ambient noise levels at the project site consist of activities and equipment at adjacent residential properties. Based on noise level measurements taken on the project site, existing ambient noise levels range from 56 to 57 A-weighted decibels equivalent noise level [dB(A) L_{eq}]. Single-family residential uses are considered "compatible" with exterior noise levels up to 60 CNEL and "conditionally compatible" with exterior noise levels up to 65 CNEL. The City's interior noise level standard for all residential uses is 45 CNEL.

The CPUs Final PEIR mitigation framework NOS-1 and NOS-2 applies to exterior and interior noise levels at residential uses and sensitive receptors. These measures apply to the project and were addressed in the Noise Analysis. Mitigation framework NOS-3 applies to noise-generating commercial and industrial uses sited near noise-sensitive uses (i.e., residential) which is not applicable since the project site does not include a commercial or industrial use. However, operational noise levels associated with heating, ventilation, and air conditioning (HVAC) units were addressed in the Noise Analysis. In order to reduce potentially significant impacts associated with construction noise, the CPUs Final PEIR mitigation framework included NOS-4 (and LU-2) requiring the implementation of construction best management practices (BMPs), including preparation of a project-specific Construction Noise Management Plan.

The following is a summary of the construction and operational noise impacts associated with the project and addressed in the Noise Analysis.

Construction Noise

Project construction noise would be generated by diesel engine-driven construction equipment used for site preparation and grading, building construction, loading, unloading, and placing materials and paving. Diesel engine-driven trucks also would bring materials to the site and remove the soils from excavation. During excavation, grading, and paving operations, equipment moves to different locations and goes through varying load cycles, and there are breaks for the operators and for non-equipment tasks, such as measurement. Although maximum noise levels may be 85 to 90 dB(A) at a distance of 50 feet during most construction activities, hourly average noise levels from the grading phase of construction would be 85 dB(A) L_{eq} at 50 feet from the center of construction activity when assessing the loudest pieces of equipment working simultaneously.

Construction noise would be regulated by the City's Noise Abatement and Control Ordinance. Section 59.5.0404 of the City's Noise Abatement and Control Ordinance states that:

A. It shall be unlawful for any person, between the hours of 7:00 p.m. of any day and 7:00 a.m. of the following day, or on legal holidays as specified in Section 21.04 of the San Diego Municipal Code, with exception of Columbus Day and Washington's Birthday, or on Sundays, to erect, construct, demolish, excavate for, alter or repair any building or structure in such a manner as to create disturbing, excessive or offensive noise. . . .

B. . . . it shall be unlawful for any person, including the City of San Diego, to conduct any construction activity so as to cause, at or beyond the property lines of any property zoned residential, an average sound level greater than 75 decibels during the 12-hour period from 7:00 a.m. to 7:00 p.m.

Construction would be restricted to between the hours of 7:00 a.m. and 7:00 p.m., and construction noise levels may not exceed a 12-hour equivalent noise level [dB(A) $L_{eq(12)}$] of 75 dB(A) $L_{eq(12)}$ as assessed at or beyond the property line of a property zoned residential.

The CPUs Final PEIR NOS-4 addresses construction noise and requires construction noise reduction measures to be implemented for projects that exceed the standards established by the SDMC in Chapter 5, Article 9.5, Noise Abatement and Control. As described in the Noise Analysis, construction noise levels are not anticipated to exceed 75 dB(A) L_{eq} at the adjacent residential uses. Although the existing adjacent residences would be exposed to construction noise levels that could be heard above ambient conditions, the exposure would be temporary. As construction activities associated with the project would comply with noise level limits from Noise Abatement and Control Ordinance Section 59.5.0404, temporary increases in noise levels from construction activities would be less than significant. Since construction noise levels are not anticipated to exceed standards established by the SDMC in Chapter 5, Article 9.5, Noise Abatement and Control, and project-specific Construction Noise Management Plan would not be required.

On-Site Generated Noise

In regard to stationary source noise, the main operational noise sources within the project site are anticipated to be those that would be typical of residential uses. Stationary sources of noise generated on a project site are regulated by the City's Noise Abatement and Control Ordinance. Section 59.5.0401 of the City's Noise Abatement and Control Ordinance states that:

A. It shall be unlawful for any person to cause noise by any means to the extent that the one-hour average sound level exceeds the applicable limit.

B. The sound level limit at a location on a boundary between two zoning districts is the arithmetic mean of the respective limits for the two districts.

The applicable noise limits of the City's Noise Abatement and Control Ordinance are summarized in Table 5.

Table 5 Applicable Noise Level Limits		
Land Use	Time of Day	One-Hour Average Sound Level [dB(A) L_{eq}]
Single-family Residential	7:00 a.m. to 7:00 p.m. 7:00 p.m. to 10:00 p.m. 10:00 p.m. to 7:00 a.m.	50 45 40
Multi-family Residential (up to a maximum density of 1 unit/2,000 square feet)	7:00 a.m. to 7:00 p.m. 7:00 p.m. to 10:00 p.m. 10:00 p.m. to 7:00 a.m.	55 50 45
All other Residential	7:00 a.m. to 7:00 p.m. 7:00 p.m. to 10:00 p.m. 10:00 p.m. to 7:00 a.m.	60 55 50
Commercial	7:00 a.m. to 7:00 p.m. 7:00 p.m. to 10:00 p.m. 10:00 p.m. to 7:00 a.m.	65 60 60
Industrial or Agricultural	Anytime	75
SOURCE: City of San Diego Noise Abatement and Control Ordinance Section 59.5.0401. dB(A) L_{eq} = A-weighted decibel equivalent noise level		

The project site is surrounded by single-family uses. The appliable daytime, evening, and nighttime noise limits are 50, 45, and 40 dB(A) L_{eq}, respectively.

The noise sources on the project site after completion of construction are anticipated to be those that would be typical of any single-family residential neighborhood, such as vehicles arriving and leaving, children at play, and landscape maintenance machinery. None of these noise sources associated with single-family uses are anticipated to violate the City's Noise Abatement and Control Ordinance or result in a substantial permanent increase in existing noise levels. The project would include HVAC units. Noise levels due to HVAC units were modeled to determine if they have the potential to produce noise in excess of City limits.

In the Noise Analysis, noise levels due to HVAC units were modeled at a series of receivers located at the adjacent residential property lines. The HVAC units were modeled at full capacity during the daytime and evening hours and at half capacity during the nighttime hours. This is typical of HVAC operation during hotter summer days. As calculated in the Noise Analysis, daytime and evening noise levels would not exceed 45 dB(A) L_{eq} and nighttime noise level would not exceed 40 dB(A) L_{eq}. Impacts associated with operational noise sources would be less than significant.

On-Site Noise Compatibility

The City's Noise Element of the General Plan specifies compatibility standards for different land use categories. Single-family residential uses are considered "compatible" with exterior noise levels up to 60 CNEL and "conditionally compatible" with exterior noise levels up to 65 CNEL. The City's interior noise level standard for all residential uses is 45 CNEL.

The main source of traffic noise at the project site is vehicle traffic on Euclid Avenue. Year 2025, 2035, and 2050 traffic volumes were obtained from San Diego Association of Governments Series 14 traffic projections (SANDAG 2021). Vehicle traffic noise level contours across the project site were calculated using SoundPLAN. Noise levels were also modeled at each of the lot locations. As

calculated in the Noise Analysis, exterior noise levels are projected to range from 49 to 56 CNEL at the proposed single-family lots. Noise levels would be less than the "compatible" exterior noise level for single-family residential uses. Exterior noise impacts would be less than significant.

Interior noise levels can be reduced through standard construction techniques. When windows are closed, standard construction techniques provide various exterior-to-interior noise level reductions depending on the type of structure and window. According to the Federal Highway Administration's (FHWA) Highway Traffic Noise Analysis and Abatement Guidance, buildings with masonry façades and double-glazed windows can be estimated to provide a noise level reduction of 35 dB, while light-frame structures with double glazed windows may provide noise level reductions of 20 to 25 dB (FHWA 2011). Standard light-frame construction would reduce exterior to interior noise levels by at least 20 dB. Therefore, interior noise levels would be 36 CNEL or less, and are not projected to exceed the interior noise level standard of 45 CNEL, and impacts would be less than significant.

Off-Site Vehicle Traffic Noise

The project would increase traffic volumes on local roadways. However, the project would not substantially alter the vehicle classifications mix on local or regional roadways nor would the project alter the speed on an existing roadway or create a new roadway. Thus, the primary factor affecting off-site noise levels would be increased traffic volumes. While changes in noise levels would occur along any roadway where project-related traffic occurs, for noise assessment purposes, noise level increases are assumed to be greatest nearest the project site, as this location would represent the greatest concentration of project-related traffic. A substantial noise increase is defined as an increase of 3 dB above existing conditions as stated in the City's CEQA significance standards.

Based on a trip generation rate of 10 trips per dwelling unit (SANDAG 2002), the project is anticipated to generate 250 daily trips. Typically, a project would have to double the traffic volume on a roadway in order to have a significant direct noise increase of 3 dB or more or to be major contributor to the cumulative traffic volumes. An increase of 250 trips on Euclid Avenue would result in a noise increase of 0.1 dB or less, which would not be an audible change in noise levels. Therefore, the project would not result in the exposure of noise sensitive land uses to significant noise levels, and impacts would be less than significant.

Vibration

Construction operations have the potential to result in varying degrees of temporary ground vibration, depending on the specific construction equipment used and operations involved. Ground vibration generated by construction equipment spreads through the ground and diminishes in magnitude with increases in distance. The effects of ground vibration may be imperceptible at the lowest levels, low rumbling sounds and detectable vibrations at moderate levels, and damage to nearby structures at the highest levels. Vibration perception would occur at structures, as people do not perceive vibrations without vibrating structures.

The construction activities that typically generate the highest levels of vibration are blasting and impact pile driving and the use of a vibratory roller. However, the project would not require blasting, pile driving, or vibratory rollers. Project construction equipment used during site grading and excavation would have the greatest potential to generate vibrations that would affect nearby uses.

Construction equipment would include equipment such as loaded trucks, excavators, dozers, and loaders. Vibration levels from these pieces of equipment would generate vibration levels with a peak particle velocity (PPV) ranging from 0.035 to 0.076 inches per second (in/sec) PPV at 25 feet. Human reaction to vibration is dependent on the environment the receiver is in as well as individual sensitivity. For example, vibration outdoors is rarely noticeable and generally not considered annoying. Typically, humans must be inside a structure for vibrations to become noticeable and/or annoying. Based on several federal studies the threshold of perception is 0.035 in/sec PPV, with 0.24 in/sec PPV being a distinctly perceptible (Caltrans 2013). Neither cosmetic nor structural damage of buildings occurs at levels below 0.1 in/sec PPV. The nearest structure is located approximately 20 feet from the project boundary. Loaded trucks would generate 0.076 in/sec PPV at 25 feet. If loaded trucks were located immediately adjacent to the fence line, this vibration level would be 0.097 in/sec PPV at the nearest structure at 20 feet. Maximum vibration levels would be below the distinctly perceptible threshold. Construction equipment would work throughout the entire project impact footprint and would be located at greater distances from the property line, therefore, vibration levels during most construction activities would be well less than this maximum exposure level and likely would not be perceptible. Thus, groundborne vibration impacts from construction would be less than significant. Once operational, the project would not be a source of groundborne vibration.

The project would be required to adhere to all relevant General Plan and CPU policies, and City noise standards. The project has implemented the requirements of the CPUs Final PEIR mitigation framework through completion of a site-specific noise analysis which demonstrates construction and operational noise impacts would be less than significant. Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the PEIR. The project would not result in a new significant impact, nor would a substantial increase in the severity of impacts from that described in the PEIR occur.

Biological Resources

CPUs Final PEIR

Section 5.5 of the CPUs Final PEIR provides an analysis of biological resource impacts associated with the CPUs. The CPUs Final PEIR determined that implementation of the CPUs has the potential to result in the loss of vegetation communities in the CPU areas and, in turn, has the potential to directly impact sensitive plant and animal species. Indirect impacts on sensitive plant and animal species may also result from placement of development adjacent to the MHPA, which is only found within the Encanto Neighborhoods CPU area. In addition, the CPUs Final PEIR concluded that future projects would be required to implement project level mitigation measures consistent with its mitigation framework BIO-1, which requires site-specific biological surveys be conducted in accordance with City of San Diego Biology Guidelines (2018) and MSCP Subarea Plan. Specifically, the CPUs Final PEIR mitigation framework BIO-1 requires future projects resulting in impacts on sensitive upland Tier I, II, IIIA, or IIIB habitats to implement avoidance and minimization measures consistent with the City Biology Guidelines and MSCP Subarea Plan and provide suitable mitigation in accordance with Table 3 in the City's Biology Guidelines and MSCP Subarea Plan. Implementation of the mitigation framework would ensure that impacts to sensitive plants and animals would be less than significant.

The CPUs Final PEIR determined that implementation of the CPUs has the potential to result in impacts on both wetland and non-wetland streambed waters regulated by the U.S. Army Corps of Engineers (USACE), California Department of Fish and Wildlife (CDFW), Regional Water Quality Control Board (RWQCB), and City of San Diego. There is also the potential for additional unmapped non-wetland waters of the U.S. and streambeds to occur within both CPU areas. Future projects implemented in accordance with the CPUs have the potential to result in impacts to habitat and drainages that are under the jurisdiction of the USACE according to Section 404 of the Clean Water Act (CWA), RWQCB in accordance with Section 401 of the CWA, and CDFW under Section 1600 of the Fish and Game Code. The CPUs Final PEIR concluded that future projects which cannot demonstrate avoidance of impacts on wetlands/jurisdictional resources would be required to implement project-level mitigation measures consistent with its mitigation framework BIO-2. Mitigation framework BIO-2 requires projects to comply with the ESL Regulations, the MSCP Subarea Plan, and the City's Biology Guidelines. Implementation of the mitigation framework detailed in BIO-2 would serve to reduce impacts on wetlands, vernal pools, and other jurisdictional water resources associated with both CPUs at the program level to below a level of significance.

The CPUs Final PEIR determined that development projects constructed in accordance with the CPUs have the potential to interfere with wildlife nesting within riparian habitats and upland habitats. The CPUs Final PEIR concluded that future projects would be required to implement project-level mitigation measures consistent with its mitigation framework BIO-3, which requires the site-specific biological resources report to identify mitigation to reduce potentially significant impacts that would interfere with the nesting, foraging, or movement of wildlife species. Compliance with established development standards and regulations including ESL, MSCP, the City's Biology Guidelines, and the mitigation framework would serve to reduce impacts at the program level associated with both CPUs to below a level of significance.

The CPUs Final PEIR determined impacts on MHPA lands within Encanto Neighborhoods CPU area would be significant, and mitigation is required. The CPUs Final PEIR concluded that future projects would be required to implement project level mitigation measures consistent with its mitigation framework BIO-1, and LU-2. Mitigation framework LU-2 requires all subsequent development projects implemented in accordance with the CPU that are within or adjacent to designated MHPA areas to comply with the Land Use Adjacency Guidelines of the MSCP in terms of land use, drainage, access, toxic substances in runoff, lighting, noise, invasive plant species, grading, and brush management requirements. Compliance with established development standards and regulations, along with implementation of the mitigation framework detailed in BIO-1 and LU-2, would serve to reduce impacts on MHPA lands at the program level within the Encanto Neighborhoods CPU area to below a level of significance.

The CPUs Final PEIR determined that subsequent projects implemented in accordance with the Encanto Neighborhoods CPU could result in indirect impacts on the MHPA and introduce land uses adjacent to MHPA within the Encanto Neighborhoods CPU area. This is considered a potentially significant impact at the program level, and mitigation is required. Implementation of mitigation framework LU-2 would reduce impacts at the program level on the MHPA from adjacent future land uses associated with the Encanto Neighborhoods CPU to below a level of significance.

Project

Consistent with the CPUs Final PEIR mitigation framework, a site-specific Biological Technical Report and a Wetland/Waters Delineation Report for the Euclid Terrace Project was prepared by RECON (RECON 2022a and RECON 2022e, respectively). Biological and wetland delineation surveys were conducted by RECON biologists Gerry Scheid and Beth Procsal on June 22, 2021. The report provides all the necessary biological data and background information required for environmental analysis according to guidelines set forth in the City's MSCP Subarea Plan (1997) and the City Biology Guidelines (2018).

The survey found six vegetation communities and land cover types that occur within the project survey area including non-native grassland, disturbed land, natural flood channel, disturbed wetland, disturbed riparian, disturbed riparian (within the wetland buffer only), and urban/developed. Table 6 presents the acreages of these vegetation communities, and land cover types.

Table 6
Impacts to Vegetation Communities/Land Cover Types (acres)

Vegetation Communities/ Land Cover Types	City of San Diego Tier	Existing Survey Area	Project Impacts
Non-Native Grassland	III-B	1.95	1.95
Disturbed Land	IV	0.82	0.71
Natural Flood Channel	-	0.05	0.00
Disturbed Wetland	-	0.07	0.00
Disturbed Riparian	-	0.04	0.02
Disturbed Riparian (within the wetland buffer only)	-	0.03	0.03
Urban/Developed Land	-	0.02	0.02
TOTAL	**-**	**2.98**	**2.73**
SOURCE: RECON 2022a.			

The project would result in impacts to 1.95 acres of non-native grassland, 0.02 acre of disturbed riparian, 0.71 acre of disturbed land, and 0.02 acre of urban/developed. Disturbed riparian vegetation (0.03 acre) would also be removed within the wetland buffer. Impacts to non-native grassland (Tier III-B) and disturbed riparian are considered significant and would require mitigation (City of San Diego 2018). Implementation of mitigation measure BIO-1 Sensitive Upland Vegetation Communities, as detailed in the project MMRP, would reduce this impact to a level less than significant. Mitigation measure BIO-1 would be consistent with the CPUs Final PEIR mitigation framework BIO-1. Impacts to disturbed land and urban/developed land are not considered significant and do not require mitigation.

The project proposes alternative compliance for brush management including installation of a fire-rated wall instead of a brush management zone 2. Removal of the invasive, non-native vegetation associated with the disturbed wetland (0.07 acre) and the remaining 0.02 acre of disturbed riparian vegetation within the area north of the grading footprint (within the wetland buffer) is proposed. This would be implemented by cutting the existing vegetation at ground level and spraying with glyphosate-based herbicide, which is safe to use in aquatic settings. No heavy equipment would be used. Removal of the disturbed riparian and disturbed wetland habitats using

this method and planting with native species is considered a project design feature and would not constitute as an impact to sensitive vegetation communities.

The Biological Technical Report determined the closest MHPA is 0.67 mile to the northeast of the project site. No MSCP-covered, narrow endemic, or state or federally listed sensitive plant species were observed on the project site and none are expected to occur due to the level of disturbance on-site. One MSCP-covered wildlife species, western bluebird, was observed on-site during the general survey No state or federally listed sensitive wildlife species are expected to occur due to the level of disturbance on-site and lack of native habitat. Impacts to MSCP-covered species are significant but would be mitigated through habitat-based mitigation, (i.e., no species-specific mitigation needed). Implementation of mitigation measure BIO-1 Sensitive Upland Vegetation Communities, as detailed in the project MMRP, would reduce this impact to a level less than significant. Mitigation measure BIO-1 would be consistent with the CPUs Final PEIR mitigation framework BIO-1.

A wetland/waters delineation was performed on-site according to the guidelines set forth by USACE (1987, 2008). A wetland/waters delineation is used to identify and map the extent of the wetlands and waters of the U.S. and provide information regarding jurisdictional issues. The project would result in a 0.02-acre impact to a disturbed riparian jurisdictional resource and 0.02-acre impact to disturbed riparian jurisdictional wetlands. Mitigation measure BIO-2, as detailed in the project MMRP, would require the purchase of credits from an approved mitigation bank to achieve a no-net-loss to jurisdictional resources. Unavoidable impacts to jurisdictional waters would require a 1602 Permit Authorization from CDFW. Mitigation measure BIO-2 would be consistent with the CPUs Final PEIR mitigation framework BIO-2.

For projects in the City, outside of the Coastal Overlay zone, impacts to wetlands, excluding vernal pools outside of the MHPA, require a deviation from the ESL wetland regulations (City of San Diego 2018). Deviations from the wetland regulations shall not be granted unless the development qualifies to be processed as one or more of the following three options: Essential Public Projects Option, Economic Viability Option, and Biologically Superior Option. The project includes a wetland deviation under the Biologically Superior Option. The deviation was approved by both the City of San Diego and the Wildlife Agencies. Concurrence from the US Fish and Wildlife Service and the CDFW on the Biologically Superior Option were received on March 1, 2023 and March 2, 2023, respectively (RECON 2022a).

Implementation of mitigation measure BIO-2 would reduce impacts to jurisdictional wetlands to a level less than significant.

Section 143.0401a.(3) of the City's ESL regulations requires any excess land within the project boundary to be placed in a covenant of easement. In accordance with Section 143.0401a.(3), the project would place the lands between the development footprint and the property boundary (0.24 acre) in a covenant of easement per Section 143.0140(a) of the SDMC ESL regulation (City of San Diego 2021). These lands would not be used towards mitigation and would be protected from future development. Therefore, the project would not conflict with any local policies or ordinances protecting biological resources.

The project adheres to all relevant General Plan, CPU policies, and City regulations including the City's Biology Guidelines. The project has implemented the CPUs Final PEIR mitigation framework through preparation of site-specific biology analysis and wetland delineations. As detailed above, the site-specific analysis has identified mitigation measures BIO-1 and BIO-2 that would be implemented to reduce impacts to less than significant. Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the PEIR. The project would not result in a new significant impact, nor would a substantial increase in the severity of impacts from that described in the PEIR occur.

Hydrology and Water Quality

CPUs Final PEIR

Section 5.6 of the CPUs Final PEIR provides an analysis of hydrology and water quality impacts associated with the CPUs. The CPUs Final PEIR determined areas where infill or redevelopment are proposed could potentially impact existing drainage patterns, increase runoff, or increase the potential for flood hazards on-site or downstream. The mitigation framework contained in the CPUs Final PEIR included HYD/WQ-1 which requires compliance with the Storm Water Standards Manual which includes design of new or improved system to meet local and state regulatory requirements satisfactory to the City Engineer. Future projects would be required to implement this measure and would reduce impacts associated with runoff to a level less than significant.

The CPUs Final PEIR determined that impacts to natural drainage patterns would be potentially significant, as buildout in accordance with the CPUs would alter land use patterns. The CPUs Final PEIR mitigation framework included HYD/WQ-1, which requires regulatory compliance with the Storm Water Standards Manual, would reduce impacts to natural drainage systems to a level less than significant.

The CPUs Final PEIR concluded that buildout of the CPUs has a potential to result in increased pollutant discharges to downstream receiving waters. Therefore, impacts associated with water quality under the CPUs have the potential to result in significant direct and indirect impacts from increased pollutant discharges. The CPUs Final PEIR mitigation framework included HYD/WQ-2, which requires regulatory compliance with the City's Storm Water Runoff and Drainage Regulations and Storm Water Standards Manual, which would reduce impacts associated with water quality to a level less than significant.

Project

Consistent with the CPUs Final PEIR mitigation framework and City regulations, Storm Water Quality Management Plan (SWQMP) forms and drainage exhibits were completed by Polaris Development Consultants, Inc. Development of the project would increase runoff by approximately 3 cubic feet per second (cfs). In order to address this increase, the project would install one biofiltration basin for the purpose of water quality, hydromodification, and peak flow detention in the northern portion of the project site. As shown in Figure 6, the project would retain the existing drainage pattern and include nine drainage basins. Runoff from proposed basin 7 would be too low to enter the biofiltration basin; therefore, an MWS would be utilized for stormwater treatment. The MWS is a concrete inlet that would accept runoff from Basin 7 and provide pollutant capture and treatment

within the inlet utilizing a media filter and vegetation. The cleansed runoff would exit the unit and join the runoff from Basin 6 and be discharged into the natural drainage course to the north. The project would also utilize Conjunctive Use Guidelines for the proposed biofiltration basin, as it would provide pollutant control, hydromodification control, and detention of the 100-year storm flow event. The project SWQMP would provide the necessary data and calculations to show that the proposed biofiltration basin meets the Conjunctive Use Guidelines. Therefore, the project would not result in a substantial increase in runoff, substantial alteration of on-site or off-site drainage patterns, or off-site erosion and sedimentation, and impacts would be less than significant.

As described in the Wetland/Waters Delineation Report and in the biological resources section above, impacts to CDFW and City jurisdictional waters would be mitigated through the purchase of 0.07 acre of Re-established River: Wetland Waters of the U.S./State credits from the San Luis Rey Mitigation Bank to achieve a no-net-loss. Unavoidable impacts to jurisdictional waters would require a 1602 Permit Authorization from CDFW. Therefore, the project would obtain permits from the RWQCB and USACE under federal Clean Water Act Section 401 or 404, respectively. As described in the biological resources section above, the wetlands on-site are highly disturbed, surrounded by existing development, have limited buffers, and have a watershed that consists almost entirely of stormwater runoff through the City's stormwater system. Therefore, the wetlands that would be impacted on-site do not consist of a natural drainage feature with connectivity to a larger wetland resource. Mitigation measure BIO-2 would create new wetlands that are of higher quality than those that would be impacted by the project. Furthermore, project runoff would not affect a navigable waterway, and no additional permitting from the RWQCB or USACE under federal Clean Water Act Section 401 or 404 beyond those associated with wetlands would be required.

The project site is located approximately 4.3 miles inland from the coast at elevations ranging from 118 to 166 feet above mean sea level; therefore, there is no risk of tsunami. There would be no risk from a seiche, as the site is not located near a large body of water, such as a lake.

Consistent with the CPUs Final PEIR mitigation framework, the project has provided site-specific analysis demonstrating consistency with the City Storm Water Runoff and Drainage Regulations (Chapter 14, Article 2, Division 2 of the LDC) and the LDC. Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the PEIR. The project would not result in a new significant impact, nor would a substantial increase in the severity of impacts from that described in the PEIR occur.

Historical Resources

CPUs Final PEIR

Section 5.7 of the CPUs Final PEIR provides an analysis of historical resource impacts associated with the CPUs. The CPUs Final PEIR determined that future development has the potential to impact previously identified recorded prehistoric or historic sites within the CPUs area. Future development implemented in accordance with the CPUs that would potentially result in impacts on significant historical resources would be required to implement mitigation framework measure HIST-1 and HIST-2, which address archaeological resources and historic buildings, structures, and objects, respectively.

Although the CPUs Final PEIR determined that there are no known human remains in the CPUs area, human remains may exist below the ground surface that could be unearthed during future development. Unearthing of unknown human remains would be considered a significant impact. The CPUs Final PEIR states that future discretionary projects that would have the potential to impact religious or sacred sites or human remains would be required to implement mitigation framework measure HIST-1.

Project

Consistent with the CPUs Final PEIR mitigation framework, a site-specific Historical Resources Survey was prepared by RECON (2022e). A records search with a one-mile radius buffer was requested from the South Coastal Information Center at San Diego State University in order to determine if previously recorded prehistoric or historic cultural resources occur within the project area. Additionally, historic aerial photographs were reviewed to assist in identifying past ground disturbances.

The records search indicated that there have been various historical resource investigations within a one-mile radius of the project. Five of these investigations crossed the project area. The records search also lists 23 cultural resources recorded within a one-mile radius of the project area of which 4 are prehistoric resources, 1 is an isolated prehistoric artifact, 1 is an isolated historic artifact, and 17 are historic-era resources. Prehistoric resources include lithic and shell scatters; historic resources consist of multi- and single-family properties, foundations, walls/adobe brick, and trash scatters. No previously recorded cultural resources occur within the project area.

A letter was sent to the Native American Heritage Commission (NAHC) on October 19, 2021 requesting they search their files to identify spiritually significant and/or sacred sites and traditional use areas in the proposed project vicinity. The NAHC was also asked to provide a list of local Native American tribes, bands, or individuals who may have concerns or interests in the cultural resources of the proposed project. A response letter from the NAHC was received on December 2, 2021, indicating the results of the Sacred Lands File search for the project site were negative. The NAHC provided a list of 20 Native American contacts who may have an interest in the project.

The project site was also surveyed on October 13, 2021, by RECON archaeologist Carmen Zepeda-Herman. Shuluuk Linton, a Native American representative from Red Tail Environmental, conducted the field survey the afternoon of October 13, 2021. The spacing between transects was 10 meters. The project area was inspected for evidence of archaeological materials such as flaked and ground stone tools, ceramics, milling features, and historic features. Photographs and field notes were taken to document the environmental setting and general conditions. The survey resulted in finding no cultural material. Ground visibility on the north-facing slope averaged 40 percent and was covered in recently mowed grass and weeds. The western portion of the north-facing slope is over 25 percent, an area generally lacking the potential of holding significant cultural material due to its steepness. Rodent hole backdirt piles on less steep areas were examined for evidence of subsurface cultural material. Modern trash including concrete blocks, brick, metal fragments, glass fragments, and rubber tires was scattered throughout the project area. Imprints of heavy equipment tracks were observed on the slope as well as tractor push piles. The southeastern corner had 90 percent ground visibility and eroded gullies with exposed cobbles. Topsoil had eroded away from this area. Evidence of a recent fire was observed in the ephemeral drainage area. An

east/west dirt trail crosses the project area. Based on the topography of the project area incorporating a steep slope and a graded mesa top, the project area is considered to have a low likelihood of containing intact cultural deposits. Therefore, the project would not require archaeological resource monitoring.

There are no historic buildings, structures, or objects on the project site. Therefore, CPUs Final PEIR mitigation framework measure HIST-2 would not apply. No known burial sites or cemeteries exist within the project site, and it is not expected that human remains would be discovered during construction. In the unlikely event of the discovery of human remains during project grading, work shall halt in that area and the procedures set forth in the California Public Resources Code (Section 5097.98) and state Health and Safety Code (Section 7050.5) shall be undertaken.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the CPUs Final PEIR. The project would not result in a new significant impact, nor would a substantial increase in the severity of impacts from that described in the CPUs Final PEIR occur.

Paleontological Resources

CPUs Final PEIR

Section 5.8 of the CPUs Final PEIR determined that impacts on paleontological resources would be potentially significant. Based on the existence of geologic formations with a high or moderate resource potential that may contain fossil remains, the potential exists that subsequent projects implemented in accordance with the CPUs. The CPUs Final PEIR mitigation framework included measure PALEO-1, which would require project level analysis and construction monitoring for projects that would exceed the City's Significance Determination Thresholds related to grading quantities and depth of excavation within areas designated as having moderate and high paleontological sensitivity ratings. Implementation of mitigation measure PALEO-1 would reduce impacts on paleontological resources to a level less than significant.

Project

Review of Figure 5.9-2 of the CPUs Final PEIR in addition to the results of the project's geotechnical investigation determined that the project site is located within an area identified as being underlain by very old paralic deposits, undivided (Qvop), which is not named on the City's general grading guidelines for paleontological resources. Project grading would require approximately 11,000 cubic yards of cut to a depth of 11 feet, which would exceed the City's established grading thresholds, requiring paleontological monitoring due to likely disturbance of underlying geologic formations. Therefore, the project would have the potential to impact paleontological resources. The project would implement mitigation measure PALEO-1 Paleontological Monitoring, as detailed in the MMRP, to reduce impacts related to paleontological resources to a level less than significant. This mitigation measure would be consistent with CPUs Final PEIR mitigation framework.

The project would be required to adhere to all relevant General Plan and CPU policies, and the CPUs Final PEIR mitigation framework, including PALEO-1. Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the PEIR. The

project would not result in a new significant impact, nor would a substantial increase in the severity of impacts from that described in the PEIR occur.

Geology and Seismic Hazards

CPUs Final PEIR

Section 5.9 of the CPUs Final PEIR provides an analysis of geology and seismic hazards associated with the CPUs. The CPUs Final PEIR determined that the CPUs contain geologic conditions which would pose significant risks for future development if not properly addressed at the project-level. Unstable conditions relating to compressible soils, landslides, seismicity (faults), and expansive soils represent a potentially significant impact for future development. The CPUs Final PEIR mitigation framework included GEO-1, which requires preparation of a site-specific geotechnical report recommending project-specific engineering design measures that would reduce potential geologic hazard impacts to a level less than significant.

The CPUs Final PEIR determined that impacts associated with erosion would be potentially significant, due to the steep nature of many of the hillsides and the generally poorly consolidated nature of the sedimentary materials and soils found throughout the CPUs. The CPUs Final PEIR mitigation framework included GEO-2, requires preparation of a site-specific geotechnical report to ensure that projects adhere to the Grading Regulation and National Pollutant Discharge Elimination System permit requirements. Implementation of this measure would reduce impacts associated with erosion to a level less than significant.

The CPUs Final PEIR determined that the CPUs consist of surficial soils composed of expansive clays, which swell when wet and shrink when dry. The CPU areas also contain areas of sloping terrain underlain by geologic structure, designated low to moderate risk for landslides. As such, conditions relating to unstable geologic units or soils represent a potentially significant impact for future development. Implementation of mitigation framework measures GEO-1 and GEO-2 would reduce impacts associated with erosion to a level less than significant.

Project

Consistent with the CPUs Final PEIR mitigation framework measure GEO-1 and City regulations, a site-specific Geotechnical Investigation (Applied Consultants 2018) and Addendum Geotechnical Report (Applied Consultants 2021) were prepared for the project by Applied Consultants. Review of the City's *Seismic Safety Study, Geologic Hazards and Faults*, 2008 Edition, Sheet 4, determined that the project site is designated as Hazard Category 53: *Level or Sloping Terrain, unfavorable geologic structure, low to moderate risk*. The Geotechnical Investigations determined that the project site is not underlain by an active fault and is not located within an Earthquake Fault Zone. Therefore, the risk associated with fault rupture is considered low. No visible evidence of earth movement was seen during the project site inspection, determining the potential for failure in landslides and earth movement to be low. Therefore, risks associated with landslides are considered low. The Geotechnical Investigation also determined that risk associated with liquefaction is considered low due to the dense nature of soils underlying the project site, lack of permanent shallow groundwater, and proposed grading. Therefore, impacts associated with these geologic hazards would be less than significant.

Based on the results of the Geotechnical Investigation, construction on the site would be feasible. Additionally, the project would be required to comply with all recommendations presented in the Geotechnical Investigation. Implementation of proper engineering design and utilization of standard construction practices, to be verified at the building permit stage, would ensure that the potential impacts related to geologic hazards would be reduced to a level less than significant.

Regarding erosion, the project would be required to prepare a Storm Water Pollution Prevention Plan (SWPPP) that would implement construction BMPs consistent with the performance standards documented in the City's Storm Water Standards Manual. Consistent with the CPUs Final PEIR mitigation framework measure GEO-2, the project would also be required to adhere to the Grading Regulation and NPDES permit requirements. Therefore, impacts related to erosion would be less than significant.

The project would be required to adhere to all relevant General Plan, CPU policies, and building standards. Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the PEIR. The project would not result in a new significant impact, nor would a substantial increase in the severity of impacts from that described in the PEIR occur.

Hazardous Materials

CPUs Final PEIR

Section 5.10 of the CPUs Final PEIR provides an analysis of hazardous materials impacts associated with the CPUs. The CPUs Final PEIR concluded that impacts associated with the potential risk of exposure from hazardous materials would be less than significant, as federal and state regulations require adherence to specific guidelines regarding the use, transportation, disposal, and accidental release of hazardous materials. In accordance with City, state, and federal requirements, any new development that involves contaminated property would necessitate the clean-up and/or remediation of the property in accordance with applicable requirements and regulations.

The CPUs Final PEIR determined that no properties found within the CPUs are included in a list of hazardous materials sites complied pursuant to Government Code Section 6596.2, and no impact would occur.

The CPUs Final PEIR found the land uses identified in the CPUs would not physically interfere with any known adopted emergency plans. In addition, the Mobility elements provide improvements to the streets and freeway system that would serve to improve evacuation times. There are no objectives or policies contained in the CPUs that would interfere with or impair implementation of an adopted emergency response or evacuation plan. In addition, the CPUs Final PEIR determined impacts related to wildfires would be less than significant, as future projects implemented in accordance with the CPUs would be required to incorporate sustainable development and other measures into site plans in accordance with the City's Brush Management Regulations, and Landscape Standards pursuant to General Plan and CPUs policies intended to reduce the risk of wildfires. All future projects would be reviewed for compliance with the 2010 California Fire Code, Section 145.07 of the LDC, and Chapter 7 of the California Building Code, and would be reviewed for

compliance with all City and Fire Code requirements aimed at ensuring the protection of people or structures from potential wildland fire hazards.

The CPUs Final PEIR determined that impacts involving safety hazards within an airport influence area would be less than significant, as the CPUs would not result in land uses that are incompatible with the adopted SDIA ALUCP.

Project

The project site is located within a designated Very High Fire Hazard Severity Zone, per the City Official Very High Fire Hazard Severity Zone Map. However, the project has been designed consistent with all brush management and landscaping regulations intended to reduce the risk of wildfires, and the Fire Access Plan has been reviewed and approved by the City. Fire-rated walls are proposed around the development. Furthermore, San Diego Fire-Rescue Department Station 12 is located at 4964 Imperial Avenue approximately 0.5 mile southeast of the project site, which would provide immediate emergency response in the event of a wildfire. Therefore, the project would not expose people to substantial risk associated with wildfires, and impacts would be less than significant.

The project site is located within the San Diego International Airport Influence Area, Review Area 2, but is located outside of any safety zone. Therefore, the project would not result in a safety hazard for people working within a designated airport influence area, and impacts would be less than significant.

There are no existing or proposed schools located within 0.25 mile of the project site. Project construction may require the use of small amounts of common solvents and petroleum products. However, these materials would not be acutely hazardous, and use in small quantities would not result in a significant hazard to the public or environment. Therefore, impacts associated with handling of hazardous materials would be less than significant.

Review of the State Water Resources Control Board Geotracker and Department of Toxic Substances Control Envirostor databases determined that there are no contaminated sites on the project site. One cleanup site that is eligible for closure as of June 13, 2022 is located south of the project site on 799 South Euclid Avenue at Peter's Auto Service. Additionally, the project site was not identified on the Department of Toxic Substance Control Cortese List. Therefore, the project would not be located on a site listed on a hazardous materials database, and impacts would be less than significant.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the CPUs Final PEIR. The project would not result in a new significant impact, nor would a substantial increase in the severity of impacts from that described in the CPUs Final PEIR occur.

Greenhouse Gas Emissions

CPUs Final PEIR

Section 5.11 of the CPUs Final PEIR evaluated whether implementation of the CPUs would conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emission of greenhouse gases (GHGs), or would generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment. The plans, policies, and regulations in place at the time of preparation of the CPUs Final PEIR included Executive Order S-3-05, which established GHG reduction targets for years 2010, 2020, and 2050; Assembly Bill 32, which required CARB to adopt rules and regulations that would reduce GHG emissions to 1990 levels by 2020; and the Climate Change Scoping Plan, which included strategies and reduction measures to achieve these reduction goals. The City had not yet adopted a Climate Action Plan (CAP). The CPUs Program EIR determined that impacts associated with GHG emissions within the CPUs would be less than significant. Specifically, the Encanto Neighborhoods CPU would result in the annual emission of 282,060 metric tons of carbon dioxide equivalent ($MTCO_2e$) of GHG. The total GHG emissions in the Encanto Neighborhoods CPU area, when compared to the business-as-usual (BAU) total annual emissions, would result in a 40.3 percent reduction in GHG emissions relative to BAU. This would exceed the City's threshold of a 28.3 percent reduction in GHG emissions relative to BAU. Federal and state regulations including the 2013 Title 24 California Building Code, Pavley Vehicle Standards, Low Carbon Fuel Standards, and California Renewables Portfolio Standard account for approximately 24 percent of this reduction. The remaining reductions would be due to CPU land use policies P-LU-1 and P-LU-3 to P-LU-10. Therefore, GHG emissions associated with the Encanto Neighborhoods CPU would be less than significant.

The CPUs Final PEIR determined implementation of the CPUs would not have a substantial adverse effect on a plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. Specifically, the Encanto Neighborhoods CPU would result in a 40.3 percent reduction relative to BAU. This exceeds the 28.3 percent required for consistency with the CARB Scoping Plan and thus would be consistent with the overall goals of the Scoping Plan and City threshold. Additionally, the Encanto Neighborhoods CPU includes land use, sustainability, and mobility policies that support measures of the Scoping Plan, which are intended to reduce VMT and increase transit and other alternative forms of transportation, promote green building, encourage alternative energy use, and create more diverse and compact land use. As the CPU would achieve a percentage reduction over BAU greater than 28.3 and its polices support the goals of the Scoping Plan, adoption of the CPU would be considered to have a less than significant impact on applicable plans, policies, and regulations adopted for the purpose of reducing the emission of GHGs.

Project

In the time since the certification of the CPUs Final PEIR, the City adopted a CAP in December 2015. The GHG emission reduction targets specified in the 2015 CAP included a 15 percent reduction in emissions (compared to year 2010 baseline emissions) by 2020, and a 50 percent reduction by year 2035. To achieve these goals, the City has identified the following CAP strategies to reduce GHG: energy- and water-efficient buildings; clean and renewable energy; bicycling, walking, transit, and land use; zero waste (gas and waste management); and climate resiliency. In order to ensure that future developments comply with the 2015 CAP, the City adopted a CAP Consistency Checklist,

adopted July 12, 2016, which was the primary document used by the City to ensure a project-by-project consistency with the underlying assumptions in the 2015 CAP and thereby to the specified emission reduction targets identified in the 2015 CAP are achieved.

In 2022, the City adopted a CAP Update which sets a goal of achieving net zero GHG emissions by 2035 with updated strategies, measures, and actions. The CAP Update centers climate equity through community engagement and pushes for bold action to mitigate the effects of climate change beyond the previously adopted 2015 CAP. Concurrent with the latest CAP Update, the City adopted new GHG emissions regulations. The 2022 CAP Update expands the goals of the 2015 CAP and identifies six strategies for achieving the goal of net zero emissions:

- Strategy 1: Decarbonization of the Built Environment
- Strategy 2: Access to Clean & Renewable Energy
- Strategy 3: Mobility & Land Use
- Strategy 4: Circular Economy & Clean Communities
- Strategy 5: Resilient Infrastructure and Healthy Ecosystems
- Strategy 6: Emerging Climate Actions

The 2022 CAP also replaced the CAP Consistency Checklist with new CAP Consistency Regulations. However, the City included provisions in the 2022 CAP that exempted certain in-process projects from the 2022 CAP Consistency Regulations, allowing such projects to rely on the CAP Consistency Checklist (City of San Diego 2022). This project qualified under the provisions of the 2022 CAP as an in-process project that is exempt from the 2022 CAP Consistency Regulations. Therefore, a CAP Consistency Checklist was completed for the project to demonstrate consistency with the City's GHG CEQA thresholds, that the project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment, and that the project would be consistent with the City's CAP. The project would also be consistent with the CAP Consistency Regulations. The following is a discussion of both the CAP Consistency Checklist and the CAP Consistency Regulations.

CAP Consistency Checklist

The CAP Consistency Checklist includes a three-step process to determine if a project would result in a GHG impact. Step 1 consists of an evaluation to determine the project's consistency with existing general plan, community plan, and zoning designations for the site. Step 2 consists of an evaluation of the project's consistency with applicable strategies and actions of the CAP. Step 3 is to determine whether a project with a land use and/or zone designation change within a Transit Priority Area would be consistent with the assumptions of the CAP. Step 3 would only apply if Step 1 is answered in the affirmative under Option B, which applies to projects that are not consistent with the existing land use plan and zoning designations, and would result in an increased density within a Transit Priority Area. A CAP Consistency Checklist was completed for the project, and its consistency is presented below.

Completion of Step 1: Land Use Consistency of the CAP Consistency Checklist determined that the project is consistent with the Residential – Low designation in the Encanto Neighborhoods CPU and the RS-1-7 (Residential – Single-Family) zone, which means the project is consistent with the growth projections used in the CAP.

Completion of Step 2: CAP Strategies Consistency of the CAP Consistency Checklist determined that the project would be consistent with applicable strategies and action for reducing GHG emissions. The project would meet the Step 2 CAP requirements by implementing the following design features:

- Utilizing roofing materials with a minimum three-year aged solar reflection and thermal emittance or solar reflection index equal to or greater than the values specified in the voluntary measures under the California Green Building Standards Code (CalGreen).
- Utilizing plumbing fixtures that do not exceed the maximum flow rate as specified in Table A5.303.231 (Voluntary measures) of the California Green Building Standards Code (CalGreen).

Since the project is consistent with the existing land use and zoning designations for the project site, Step 3 of the CAP Consistency Checklist is not required.

Based on the project's consistency with the City's CAP Consistency Checklist, the project's contribution of GHGs to cumulative statewide emissions would be less than cumulatively considerable. Therefore, the project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment, and impacts would be less than significant.

CAP Consistency Regulations

As part of the implementation measures for the CAP, the City adopted amendments to the SDMC to add CAP Consistency Regulations as Chapter 14, Article 3, Division 14. The CAP Consistency Regulations apply to specified ministerial and discretionary projects to ensure projects comply with the goals and objectives of the updated CAP.

The City's CEQA significance thresholds specify that significance of GHG emissions is determined for project-level environmental documents through (a) evaluating whether the project is consistent with the growth projections used in the development of the CAP and (b) project compliance with the regulations set forth in SDMC Chapter 14, Article 3, Division 14. A project would be considered consistent with the growth projections used in the CAP if it is consistent with the existing General Plan and Community Plan land use and zoning designations. The project is consistent with the Residential – Low designation in the Encanto Neighborhoods CPU and the RS-1-7 (Residential – Single-Family) zone, which means the project is consistent with the growth projections used in the CAP.

Step 2 of determining CAP consistency is determining if the project is consistent with the regulations set forth in SDMC Chapter 14, Article 3, Division 14. Projects that are consistent with the CAP as determined through compliance with the CAP Consistency Regulations may rely on the CAP for the cumulative impacts analysis of GHG emissions. The project would be consistent with the CAP Consistency Regulations as detailed below.

Mobility and Land Use Regulations (SDMC Section 143.1410)

The Mobility and Land Use Regulations section of the CAP Consistency Regulations requires the following improvements to be provided.

Street Shading – This provision of the CAP Consistency Regulations requires projects to provide shading of at least 50 percent of the Throughway Zone through either trees and/or a combination of trees and structures for premises that contains a street yard or abuts a public right of way with a Furnishings Zone. These regulations would apply to the project frontage along Euclid Avenue. To fulfill this requirement, the project landscape plans show trees along the back of sidewalk, between the existing trees to achieve 50 percent shade coverage of the Throughway Zone along the Euclid Avenue project frontage.

Pedestrian Amenities – The regulations require at least one pedestrian amenity for every 250 feet of linear feet of street frontage (e.g., trash and recycling receptacles, seating, lighting, public artwork, wayfinding signs, transit stop enhancement). To comply with these provisions, the project design includes public street lighting pedestrian amenities along Euclid Avenue to account for the approximate 172 linear feet of frontage.

Bicycle Charging – The regulations require at least 50 percent of all residential and non-residential bicycle parking spaces required in accordance with Chapter 14, Article 2, Division 5 to be supplied with individual outlets for electric charging at each bicycle parking space. Per SDMC Section 142.0525, bicycle parking is not required for dwelling units with enclosed garages; therefore, no common bicycle racks are proposed. All residential bicycle parking would be accommodated within garages which would have accessibility to outlets for electric charging.

Resilient Infrastructure and Healthy Ecosystems Regulations (SDMC Section 143.1415)

The Resilient Infrastructure and Healthy Ecosystems Regulations requires two trees to be provided on the premises for every 5,000 square feet of lot area, with a minimum of one tree per premises. If the required trees cannot be provided on-site, they can either be provided off-site or the Urban Tree Canopy Fee can be paid. The project's landscape plan has been updated to provide the required trees based on the lot area. The total lot area is 3.02 acres or 131,551 square feet which would require 52 total trees to meet the minimum requirements. As detailed in the projects' landscape plans, a total of 99 trees have been provided, exceeding the minimum requirements.

Based on the project's consistency with the City's CAP Consistency Regulations, the project's contribution of GHGs to cumulative statewide emissions would be less than cumulatively considerable. Therefore, the project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs or generate GHG emissions that may adversely affect the environment, and impacts would be less than significant.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the CPUs Final PEIR. The project would not result in a new significant impact, nor would a substantial increase in the severity of impacts from that described in the CPUs Final PEIR occur.

Energy

CPUs Final PEIR

Section 5.12 of the CPUs Final PEIR provides an analysis of energy conservation impacts associated with the CPUs. The applicable regulations related to energy conservation include, but are not limited to, the California Code of Regulations (CCR; Title 24), the Urban Design and Conservation and Sustainability elements of the Encanto Communities CPU. At the time of adoption of the CPUs Final PEIR, the City had not adopted a CAP. Energy use associated with CPU build-out would be required to comply with the CCR, Title 24, referred to as the California Building Code. The California Building Code consists of a compilation of several distinct standards and codes related to building construction, including plumbing, electrical, interior acoustics, energy efficiency, handicap accessibility, and so on. Of particular relevance are the California Building Code energy efficiency and green building standards (CALGreen). The CCR, Title 24, Part 6 is the Energy Efficiency Standards. This code establishes energy-efficiency standards for residential and non-residential buildings in order to reduce California's energy consumption.

The CPUs Urban Design and Conservation Elements build on the City's General Plan Urban Design and Conservation Elements with policies tailored to the conditions in the CPUs.
The CPUs Final PEIR concluded that impacts associated with the increased demand for electric power would be less than significant, as the existing tie-in lines, substations, and distribution network are projected to be adequate to serve the SESD and Encanto Neighborhoods CPU areas. Implementation of the CPUs would not result in the use of excessive amounts of fuel or other forms of energy during the construction of future projects given the short-term nature of the energy consumption. Even though exact details of the projects implemented in accordance with the CPUs are not known at this time, there are no conditions in the CPU areas that would require non-standard equipment or construction practices that would increase fuel-energy consumption above typical rates. Future projects would be required to comply with the CPU Urban Design Elements, which contain a list of Climate Change and Sustainable Development Policies that focus on designing new development to have a climate, energy efficient, and environmentally oriented site design (SESD CPU Policy P-UD-47 and Encanto Neighborhoods CPU Policy P-UD-45); incorporating environmentally conscious building practices and materials (SESD CPU Policy P-UD-51 and Encanto Neighborhoods CPU Policy P-UD-49); minimizing building heat gain and appropriately shading windows (SESD CPU Policy P-UD-49 and Encanto Neighborhoods CPU Policy P-UD50); providing on-site landscaping improvements that minimize heat gain and provide attractive and context sensitive landscape environments (SESD CPU Policy P-UD-50 and Encanto Neighborhoods CPU Policy P-UD-48); ensuring development integrates storm water BMPs on-site (SESD CPU Policy P-UD-53 and Encanto Neighborhoods CPU Policy P-UD-51); and integrating energy generation and sustainability into overall building design consistent with the architectural design (SESD CPU Policy P-UD-54 and Encanto Neighborhoods CPU Policy P-UD-52). Although these policies would decrease the overall per capita energy use in the CPU areas, they would not ensure that energy supplies would be available when needed. Future projects would be subject to review for measures that would further reduce energy consumption in conformance with existing regulations. The Conservation elements for both CPUs also set forth goals to increase building energy efficiency and on-site production of renewable energy. Within the Climate Change and Sustainability sections, policies state that in order to reduce project-level GHG emissions to acceptable levels through project design, application of site-specific mitigation measures or adherence to standardized measures outlined in an adopted

citywide CAP should take place (Policy P-CS-3 in both the SESD and Encanto Neighborhoods CPUs). The combination of planned sustainable building techniques and energy efficiency practices would result in a decrease in energy consumed for the operation of new buildings within the CPU areas relative to the current energy code.

Section 5.12 of the CPUs Final PEIR identifies the CPU Mobility Elements contain policies that would reduce VMT and associated fuel consumption. These include policies to improve neighborhood walkability design (Policies P-MO-1 through P-MO-5 for both SESD and Encanto Neighborhoods CPUs); increase bicycle infrastructure and bike riding incentives (Policies P-MO-7 through P-MO-9 for both SESD and Encanto Neighborhoods CPUs); expand public transit in the CPU areas (Policies PMO-10 through P-MO-15 for SESD CPU and Policies P-MO-10 through P-MO-12 and Policies P-MO-14 and P-MO-15 for Encanto Neighborhoods CPU); and provide traffic calming measures that improve safety and promote walking and bicycling in the communities (Policies P-MO-16 through P-MO-22 and P-MO-24 through P-MO-28 for the SESD CPU area and Policies P-MO-16 through P-MO-19, Policies P-MO-21 and P-MO-22, and Policies P-MO-24 through P-MO-28 for the Encanto Neighborhoods CPU area). The CPUs Final PEIR concluded that development in accordance with the CPUs would not result in the use of excessive amounts of fuel during the operation of future development projects under the CPUs, and operational energy consumption impacts would be less than significant.

Project

Energy used during construction of the project would not be considered significant given the short-term nature of the energy consumption. In regard to long-term operational-related energy consumption, the project would be consistent with the land use and zoning designations analyzed in the CPUs Final PEIR, and development of the project would not result in any new or more severe impacts related to electrical power or fuel consumption in comparison to what was previously analyzed. Additionally, since adoption of the CPUs, the City adopted a CAP and new updated versions of the energy code are in effect that improve energy efficiency. The current version of the Energy Code, known as the 2022 Title 24, or the 2022 Energy Code, became effective January 1, 2023. The 2022 Title 24 Building Energy Efficiency Standards increase requirements for on-site renewable energy generation from solar, increase electric load flexibility to support grid reliability, reduce emissions from newly constructed buildings, reduce air pollution for improved public health, and encourage adoption of environmentally beneficial efficient electric technologies. It is anticipated that the new 2022 Title 24 energy standards will result in a 10.9 percent increase in energy efficiency for multi-family uses over the previous code (CEC 2021). The project would be constructed using the 2022 Title 24 standards which ensure there would not be excessive energy use associated with building operations. Additionally, the project is in a VMT efficient area which would ensure operational energy use is not excessive. Therefore, the project would not result in the use of excessive amounts of fuel or other forms of energy and would not result in a need for new electrical systems or require substantial alteration of existing utilities.

Construction of the project would consume energy through the operation of heavy off-road equipment, trucks, and worker traffic. However, all equipment would be required to meet CARB Tier 3 In-Use Off-Road Diesel Engine Standards. Engines are required to meet certain emission standards, and groups of standards are referred to as Tiers. A Tier 0 engine is unregulated with no emission controls, and each progression of standard level (i.e., Tier 1, Tier 2, Tier 3, etc.) generates

lower emissions, use less energy, and are more advanced technologically than the previous tier. CARB's Tier 3 In-Use Off-Road Diesel Engine Standards requires that construction equipment fleets become cleaner and use less energy over time. The project would be required to comply with Policies P-MO-1 through P-MO-28 of the Encanto Neighborhoods Mobility Element. Therefore, the project would not result in the use of excessive amounts of fuel or other forms of energy (electricity or natural gas) during construction, and impacts would be less than significant.

Additionally, the project would be served by San Diego Gas & Electric (SDG&E), which currently has an energy mix that includes 39 percent renewable energy (California Public Utilities Commission 2020) and is on track to achieve 60 percent renewable energy content by 2030 as required by the State of California's Renewable Portfolio Standards. Therefore, the project would not result in the use of excessive amounts of energy, create unnecessary energy waste, or conflict with any adopted plan for renewable energy efficiency, and impacts would be less than significant.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the CPUs Final PEIR. The project would not result in a new significant impact, nor would a substantial increase in the severity of impacts from that described in the CPUs Final PEIR occur.

Public Services and Facilities

CPUs Final PEIR

Section 5.13 of the CPUs Final PEIR provides an analysis of public services and facilities impacts associated with the CPUs. Implementation of the CPUs would increase the demand for public services and facilities within the CPU areas as a result of population growth. Projected growth in each community is as follows:

- SESD CPU may generate an increase of up to 13,176 residents; and
- Encanto Neighborhoods may generate an increase of up to 26,020 residents.

The CPUs Final PEIR determined that implementation of the CPUs would result in increased population within the CPU areas, thus, increasing demand for police protection services. The General Plan includes policies regarding police protection (PF-E-1 through PF-E-7) and the CPUs include policies to reduce criminal activity within the community areas. These provisions include continuing Neighborhood Watch Programs, developing Community Alert Programs, maintaining a community relations program between police and residents, and ensuring that development projects provide adequate features to facilitate safety and surveillance. Given that the police protection standards enumerated in the General Plan, that the CPUs include relevant policies to reduce criminal activity, that the IFS would support additional police facilities should such facilities be identified for inclusion in the IFS, the impact on police protection would be less than significant.

The CPUs Final PEIR determined that implementation of the CPUs would result in increased demand for fire protection services due to population growth at buildout. This increased population could increase the call volume for fire protection in the CPU areas and could contribute to the need for new or altered facilities. The CPU Policies P-PF-2 (Southeastern San Diego) and P-PF-7 (Encanto Neighborhoods) address the provision of fire protection services; these policies complement the

policies in the General Plan. The CPU policies aim to maintain high fire protection service levels to meet the demands of continued growth and development in the community by regularly upgrading fire stations as necessary to adequately respond to fires and emergencies, by educating the community regarding fire protection techniques, and by modernizing or replacing facilities and equipment. The Encanto Neighborhoods CPU includes policies to monitor response times and to renovate Fire Station #12. The Fire Department has identified a station to be developed in the vicinity of 65th Street and Broadway as a critical priority for construction to serve existing development and expected new growth. In addition, an IFS was prepared as part of the implementation of the CPUs, and would ensure that future projects proposed within the CPU areas are assessed fees that would contribute towards the construction of fire stations as needed. Given CPU policies to provide fire protection service (which support General Plan policies on fire protection), and the preparation of the IFS, fire protection needs would be met throughout the planning process; therefore, the CPUs would have a less than significant impact on fire protection service.

The CPUs Final PEIR stated that buildout of the CPUs would result in demand for new park lands. In order to provide a minimum of 2.8 usable acres of population-based parks per 1,000 residents, new parks, or equivalencies, would be required in the CPU areas through buildout. Both CPUs contain proposed population-based parks which improve the ratio of usable acres per 1,000 residents compared to current conditions, but fall short of the General Plan standard. However, this deficit would need to be fulfilled in the future by land acquisitions/donations or future park equivalencies identified by the City or the community. The CPUs improve the ratio of usable acres per 1,000 residents and contain policies to promote future park equivalencies. Therefore, the CPUs Final PEIR determined that at the program level of analysis, impacts related to the demand for new park lands within the CPU areas would be less significant.

The CPUs Final PEIR stated that buildout of the CPUs has the potential to result in a substantial increase in the student population in the two communities. Specifically, Encanto Neighborhoods would need space for 5,767 students, and Southeastern for 665 students. Therefore, the potential increase in students from the number of future additional housing units could result in the need for new or expanded school facilities, particularly in Encanto Neighborhoods. While the school district does not currently plan any additional new school projects in Encanto Neighborhoods beyond those funded, it is likely that additional school capacity will need to be added during the planning period, both to replace aging facilities and to accommodate additional students generated by new development. Policies in the General Plan promote cooperation with educational agencies and school districts in the siting of future schools. The CPUs also include policies to support quality educational opportunities in Southeastern San Diego and Encanto Neighborhoods. In the interest of coordinated planning, CPU policies point to ways in which school facilities can contribute to neighborhood livability and revitalization; coordinate with adjacent parks and community facilities; improve safety and walkability; and enhance access to education for neighborhood residents. The San Diego Unified School District is responsible for planning, siting, building, and operating schools in their responsible districts within the CPU area when additional demand warrants new schools. Since the CPUs contain policies to improve school capacity, impacts on school facilities would be less than significant.

The CPUs Final PEIR determined that both CPUs contain policies to ensure that future library services provide the necessary resources for Southeastern San Diego and Encanto Neighborhoods

residents. The CPUs also support the extension of library hours, expansion of book and periodical collections, and hiring of additional staff as necessary. Given these policies, in addition to General Plan policies, it is reasonable to expect that both communities would have adequate access to library services. Therefore, the CPUs Final PEIR determined that as the program level of analysis, impacts related to the construction of a new library within the CPU areas would be less significant.

Project

The project would develop 25 single-family residential units consistent with the existing land use and zoning designations identified in the CPUs. Consequently, the project would be consistent with growth projections that were utilized to forecast demand for future fire protection that was analyzed in the CPUs Final PEIR. Therefore, the project would not result in development beyond that anticipated under the CPUs and would not increase the demand for fire protection within the service area. Furthermore, the project would pay Development Impact Fees prior to building permit issuance, which would be used to maintain and fund future fire protection facilities. The project would not require any new or expanded fire protection facilities, and impacts would be less than significant.

The project would develop 25 single-family residential units consistent with the existing land use and zoning designations identified in the CPUs. Consequently, the project would be consistent with growth projections that were utilized to forecast future police protection demand that was analyzed in the CPUs Final PEIR. Therefore, the project would not result in development beyond that anticipated under the CPUs and would not increase the demand for police protection within the service area. Although the project could result in increases in service calls, no new facilities or improvements to existing facilities would be required as a result of the project due to its consistency with future development projections for the CPUs. Moreover, ongoing funding for police services is provided by the City General Fund, and the project would pay Development Impact Fees prior to building permit issuance, which would be used to maintain and fund future police protection facilities. Therefore, the project would not require any new or expanded police protection facilities, and impacts would be less than significant.

The project would develop 25 single-family residential units consistent with the existing land use and zoning designations identified in the CPUs. Consequently, the project would be consistent with growth projections that were utilized to forecast demand for future school services, park and recreation facilities, libraries, and other public services that were analyzed in the CPUs Final PEIR. Therefore, the project would not require construction of additional infrastructure beyond what was anticipated in the CPUs that could induce growth. Therefore, the project would not result in population growth that could increase demand for school services, park and recreation facilities, libraries, or other public services. No impact would occur.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the CPUs Final PEIR. The project would not result in a new significant impact, nor would a substantial increase in the severity of impacts from that described in the CPUs Final PEIR occur.

Public Utilities

CPUs Final PEIR

Section 5.14 of the CPUs Final PEIR evaluated potential impacts on utility services that may occur through development of the CPUs.

The CPUs Final PEIR concluded implementation of the CPUs would not directly require alteration to existing natural gas facilities. Direct impacts on electrical and natural gas facilities would be addressed and mitigated by SDG&E at the time incoming development projects occur and are not typically evaluated by City staff. At a minimum, future projects under the CPUs would be required to meet the mandatory energy standards of the current California energy code (Title 24 Building Energy Standards of the California Public Resources Code). Some efficiencies associated with the Energy Standards under Title 24 include the building HVAC mechanical system; water heating system; and lighting system. The planning level analysis of the CPUs shows an estimated decrease in future natural gas consumption in the CPU areas compared to current consumption. Therefore, the CPUs Final PEIR determined that at the program level of analysis, impacts related to natural gas within the CPU areas would be less significant.

The CPUs Final PEIR determined there to be sufficient water supply to serve existing demands, projected demands of the CPUs, and future water demands in normal and dry year forecasts during a 20-year projection. As future development takes place in the CPU areas, demand for water is likely to increase and create a potential need to increase sizing of existing pipelines and mains. This would be reviewed on a project-by-project basis. Additionally, the CPUs each contain a policy supporting the expansion of the City's reclaimed water system. All proposed public water facilities would be required to be designed and constructed in accordance with established criteria in the City's Water Facility Design Guidelines, LDC, and any other applicable regulations, standards, or practices. Future development under the CPUs would be generally consistent with the existing urban growth patterns and the necessary infrastructure improvements to the water system would be consistent with what is necessary for new development and to maintain the existing system. Given that future improvements to water facilities in accordance with the CPUs would be consistent with existing development and capital improvements planning, would be consistent with planned water supplies and demands, and would comply with existing guidelines and regulations and proposed CPU policies, this impact is less than significant.

The CPUs Final PEIR determined existing treatment facilities would have sufficient capacity to accommodate any population growth that may occur in the CPU areas in accordance with the CPUs. Replacement and maintenance of wastewater pipeline and facilities takes place on an ongoing basis as identified in the City's Capital Improvements Program. Future development under the CPUs would require an increase in sizing of existing pipelines and mains in order to meet increased demand. Upgrades to sewer lines are administered by the City's Public Utilities Department and are handled on the basis of individual projects. Such necessary infrastructure improvements would be standard practice for new development to maintain the existing system. Any future development would be required to comply with the SDMC regulations regarding sewers and wastewater facilities (Chapter 6, Article 4) and would be expected to follow the City's Sewer Design Guidelines. Adherence to existing regulations and standards would ensure that flows from new projects would not adversely affect downstream conveyance systems and that previous studies have accounted for

those flows in the design of the downstream conveyance system. In addition, the CPUs each contain a policy to support the ongoing systematic implementation of capital improvements projects to ensure that the sewer system remains in operable condition, and that system projects are coordinated among City departments. Given ongoing and planned improvements to the system, existing regulations and guidelines to ensure adequate capacity, and proposed CPU policies to support capital improvements, impacts associated with the wastewater system would be less than significant.

The CPUs Final PEIR determined that future development under the CPUs could increase the amount of impervious surfaces in the CPU areas, thus increasing the amount or rates of surface runoff and increasing demands on existing storm water systems. As individual development projects are implemented in accordance with the CPUs, localized improvements to the storm water system would be required as part of the project design and review. All storm water facilities constructed in conjunction with future development would be reviewed for consistency with the City's Storm Water Standards. While the details of storm water infrastructure improvements would depend on the actual design of a future project, strict adherence to existing storm water regulations, conformance with General Plan and CPU policies, and project-specific review under CEQA would assure that impacts associated with the installation of storm water infrastructure would be reduced to below a level of significance.

Communication systems impacts were identified as less than significant, as cable and telephone services would be available through private utility companies that have capacity to serve the CPU areas. In addition, the CPUs Final PEIR determined that future siting of communications infrastructure would be in accordance with the LDC, including section 141.0420 regulating wireless communications facilities, as well as the City's Wireless Communications Facilities Guidelines, which seek to minimize visual impacts. Adhering to General Plan policies supporting the City's undergrounding program would also ensure that visual impacts of new facilities are minimized. Similarly, the CPUs each contain policies supporting utility undergrounding.

The CPUs Final PEIR determined that future projects implemented in accordance with the CPUs would be required to comply with City regulations regarding solid waste, including the Recycling Ordinance and the Construction Demolition Debris Diversion Deposit Program, each intended to divert solid waste from the Miramar Landfill to preserve capacity, and to support the 75 percent mandatory waste diversion goals established by Assembly Bill (AB) 341 and AB 939. Additionally, the City requires that any discretionary project that would exceed the City's CEQA determination thresholds for solid waste is required to prepare a Waste Management Plan to identify and mitigate impacts from project-level solid waste generation during both short-term construction and long-term operation. With ongoing compliance from future development with the LDC and Waste Management Plan requirements and policies promoting waste diversion, as well as compliance with proposed policies in each of the CPUs, impacts from solid waste were determined to be less than significant.

Project

Natural Gas and Electricity

The project is located in an area with existing access to natural gas and electricity. All physical impacts associated with connection of the site to surrounding utilities and electricity is addressed within this EIR Addendum.

Water and Wastewater

The project would connect to an existing 10-inch sewer main, and a 12-inch water pipe, which would be adequate to serve the needs of the project. The connections to these sewer and water facilities would be located within the project footprint. Therefore, potential impacts associated with construction of these sewer and water facilities was evaluated throughout this EIR Addendum. The project would develop 25 single-family residential units consistent with the existing land use and zoning designations identified in the CPUs. Consequently, the project would be consistent with growth projections that were utilized to forecast demand for sewer and water service that was analyzed in the CPUs Final PEIR. Therefore, the project would not increase demand for sewer and water service within the service area that would necessitate construction of new off-site facilities, and impacts would be less than significant.

Storm Water Infrastructure

As described in the Hydrology and Water Quality section above, and shown in Figure 6, the project would retain the existing drainage pattern and include nine drainage basins. Therefore, the project would not require the construction of off-site stormwater infrastructure facilities. All physical impacts associated with stormwater infrastructure are addressed within this EIR Addendum with impacts mitigated to less than significant.

Communications Systems

The project site is located in an urbanized area of the city with existing communication services. The project would develop residential uses consistent with the land use and zoning designations identified in the CPUs Final PEIR. Consequently, the project would be consistent with growth projections that were utilized to forecast demand for future communications systems that was analyzed in the CPUs Final PEIR. Site-specific connections to existing communications infrastructure would be located within the project footprint evaluated throughout this EIR Addendum. Therefore, communications services connections would not result in any environmental impacts that have not been evaluated in this EIR Addendum, and impacts would be less than significant.

Solid Waste

Consistent with the CPUs Final PEIR, a site-specific Waste Management Plan (WMP) was prepared for the project by RECON (RECON 2022f). The project site is currently undeveloped and would not require demolition requiring disposal. Project grading would require approximately 11,000 cubic yards of cut and 11,000 cubic yards of fill, which would result in balanced earthwork on-site. All green waste would be recycled at the Otay Landfill facility for 100 percent diversion. Therefore, the project would achieve 100 percent diversion during grading. Of the 58.4 tons estimated to be generated during construction, 46.7 tons would be diverted. This would result in the diversion and reuse of 80.0 percent of the waste material generated from the project from the landfill, which would meet the City's current 75 percent waste diversion goal. The WMP states that operation of the project would generate approximately 40.0 tons of waste per year. The project would meet this requirement by having each individual detached single-family residential unit provide its own 3.84 square feet of refuse storage and 3.84 square feet of recycling storage within their garages. Refuse and recyclables stored by each dwelling unit would be collected through curbside garbage and recycling services. The applicant (or applicant's successor in interest) would implement the ongoing waste reduction measures as outlined in the WMP to ensure that the waste is minimized, and the operation of the project complies with City ordinances. Implementation of the waste reduction measures documented in the WMP would reduce operational impacts related to solid waste to a level less than significant.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the CPUs Final PEIR. The project would not result in a new significant impact, nor would a substantial increase in the severity of impacts from that described in the CPUs Final PEIR occur.

Visual Effects and Neighborhood Character

CPUs Final PEIR

Section 5.15 of the CPUs Final PEIR provides an analysis of visual effects and neighborhood character impacts associated with the CPUs. The CPUs Final PEIR concluded that implementation of the CPUs would result in less than significant impacts to the existing or planned character of the area. Much of the CPU areas are already developed, and any new development or redevelopment would be expected to take place on infill sites. Any new development projects would be in accordance with the City's General Plan and SDMC. Compliance with these existing policies and regulations would prevent development in excess of height and bulk regulations and ensure that any new development is compatible with historic preservation standards, landform features, such as hillsides, and any sensitive resources that may contribute to visual character. In addition, the CPUs land use and urban design policies serve to minimize the negative impacts that incompatible uses may have on visual character, and encourage development that is more compatible with the scale and design of surrounding development and land uses. Public facilities policies serve to reduce the visual interference of utilities and other facilities on the streetscape. Recreation policies serve to maintain park spaces, which are important public viewpoints. Conservation and sustainability policies serve to preserve and enhance the open spaces and landforms that contribute to the CPU areas' scenic integrity. Historic preservation policies serve to preserve and enhance historic sites and

districts, and arts and culture policies encourage the integration of public art into future development and public spaces.

The CPUs Final PEIR determined that impacts associated with landform alteration would be less than significant, as the CPUs do not propose any specific development projects that would involve the grading or alteration of steep hillsides. Future development within the CPU areas would require grading activities as part of construction, and all future projects would be subject to the regulations in the City's LDC; projects would thus need to demonstrate compliance with the hillsides regulations and other Environmentally Sensitive Lands Regulations prior to development permit approval, as well as compliance with grading and excavation regulations prior to construction.

The CPUs Final PEIR determined light or glare impacts would be less than significant. Both of the CPUs contain policies that would encourage the use of lighting in public areas, on streets and walkways, in alleys, on building facades, and in parking lots for both public safety and aesthetic purposes. Proposed policies also encourage the integration of lighting design into new development design and discourage unnecessary glare and light spillage, ensuring that light sources are compatible with the surrounding environment and enhance rather than detract from the aesthetic character of the area. Any future development would be required to comply with the SDMC, which includes light pollution reduction regulations. Lighting from future development in compliance with the SDMC and the proposed CPU policies would therefore not be out of character with the urban environment and impacts would be less than significant.

Project

The project site is currently undeveloped and surrounded by single-family residential development. Figure 8-2 in the Encanto Neighborhoods CPU illustrates public views that have been identified in the community including viewsheds, scenic overlooks, and view corridors. Review of Figure 8-2 in the Encanto Neighborhoods CPU determined that there are no public views within proximity to the project site.

The project would comply with applicable land use and development design guidelines and policies of the CPUs which are intended to ensure that future development within the CPUs area would not result in architecture, urban design, landscaping, or landforms that would negatively affect the visual quality of the area, or strongly contrast with the surrounding development. The project would be compatible with the scale and design of surrounding development, and impacts would be less than significant.

The project site is zoned as RS-1-7 (Residential – Single-Family) in the Encanto Neighborhoods Community Plan (see Figure 3.7-2; City of San Diego 2015). While the project includes a number of deviations from the base zone standards including reduction in lot area, lot width and lot depth, the overall site density would be consistent with density planned in the RS-1-7 zone. Additionally, the project has been designed consistent with all applicable design guidelines of the CPUs. Therefore, the project would be consistent with surrounding development, and impacts would be less than significant.

The project site does not contain any unique physical features such as a natural canyon or natural hillside slopes. A disturbed drainage exists along the northern portion of the site which would be

largely avoided and non-native invasive species in the wetland buffer would be removed with native plantings provided to enhance the visual appearance of this area. Although the project would require approximately 11,000 cubic yards of cut and 11,000 cubic yards of fill, the project would not meet any of the conditions that would result in a significant impact related to landform alteration. There are no steep hillsides on the project site due to the gently to moderately sloping site topography, with elevations ranging from 118 to 166 feet above mean sea level. Similarly, the project would not require mass terracing of natural slopes. Therefore, the project would not result in a substantial change in the existing landform or loss of unique physical features, and impacts would be less than significant.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the CPUs Final PEIR. The project would not result in a new significant impact, nor would a substantial increase in the severity of impacts from that described in the CPUs Final PEIR occur.

VI. MITIGATION, MONITORING, AND REPORTING PROGRAM (MMRP) INCORPORATED INTO THE PROJECT

The project shall be required to comply with the applicable mitigation measures outlined within the Mitigation Monitoring and Reporting Program (MMRP) of the previously certified CPUs Final PEIR (No. 386029/SCH No. 2014051075) and those identified with the project-specific subsequent technical studies. The following MMRP identifies measures that specifically apply to this project.

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

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

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

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

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

5. **SURETY AND COST RECOVERY –** The Development Services Director or City Manager may require appropriate surety instruments or bonds from private Permit Holders to ensure the long-term performance or implementation of required mitigation measures or programs.

The City is authorized to recover its cost to offset the salary, overhead, and expenses for City personnel and programs to monitor qualifying projects.

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

1. **PRECONSTRUCTION MEETING IS REQUIRED TEN (10) WORKING DAYS PRIOR TO BEGINNING ANY WORK ON THIS PROJECT.** The PERMIT HOLDER/OWNER is responsible to arrange and perform this meeting by contacting the CITY RESIDENT ENGINEER (RE) of the Field Engineering Division and City staff from MITIGATION MONITORING COORDINATION (MMC). Attendees must also include the Permit holder's Representative(s), Job Site Superintendent and the following consultants:

   Qualified Biologist, Qualified Paleontological Monitor

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

   For Clarification of ENVIRONMENTAL REQUIREMENTS, it is also required to call **RE and MMC at 858-627-3360**

2. **MMRP COMPLIANCE:** This Project, Project Tracking System (PTS) No. 675101 and/or Environmental Document No. 675101, shall conform to the mitigation requirements contained in the associated Environmental Document and implemented to the satisfaction of the DSD's Environmental Designee (MMC) and the City Engineer (RE). The requirements may not be reduced or changed but may be annotated (i.e., to explain when and how compliance is being met and location of verifying proof, etc.). Additional clarifying information may also be added to other relevant plan sheets and/or specifications as appropriate (i.e., specific locations, times of monitoring, methodology, etc.

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

2. **OTHER AGENCY REQUIREMENTS:** Evidence of compliance with all other agency requirements or permits shall be submitted to the RE and MMC for review and acceptance prior to the beginning of work or within one week of the Permit Holder obtaining documentation of those permits or requirements. Evidence shall include copies of permits, letters of resolution or other documentation issued by the responsible agency:
   Not Applicable

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

Note: Surety and Cost Recovery – When deemed necessary by the Development Services Director or City Manager, additional surety instruments or bonds from the private Permit Holder may be required to ensure the long-term performance or implementation of required mitigation measures or programs. The City is authorized to recover its cost to offset the salary, overhead, and expenses for City personnel and programs to monitor qualifying projects.

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

Document Submittal/Inspection Checklist

Issue Area	Document Submittal	Associated Inspection/Approvals/Notes
General	Consultant Qualification Letters	Prior to Preconstruction Meeting
General	Consultant Construction Monitoring Exhibits	Prior to or at Preconstruction Meeting
Biology	Consultant Qualification Letters	Prior to Preconstruction Meeting
Biology	Biology Reports	Biology Inspection
Paleontology	Paleontological Reports	Paleontology Site Observation

C. SPECIFIC MMRP ISSUE AREA CONDITIONS/REQUIREMENTS

Biological Resources

BIO-1: Sensitive Upland Vegetation Communities

Prior to Notice to Proceed (NTP) for any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits, the Owner/Permittee shall make payment to the City Habitat Acquisition Fund (HAF) to mitigate for the loss of 1.95 acres of non-native grasslands (Tier IIIB). This fee is based on mitigation ratios, per the City of San Diego Biology Guidelines, of 0.5:1 ratio if mitigation would occur inside of the MHPA and a 1:1 ratio should mitigation occur outside of the MHPA. Therefore, the resulting total mitigation required for direct impacts to non-native grassland (Tier IIIB) shall be 0.98 acre(s) inside the MHPA or 1.95 acre(s) outside the MHPA equivalent monetary contribution into the City's HAF plus a 10 percent administrative fee.

BIO-2: Jurisdictional Waters

Prior to NTP for any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits, the Owner/Permittee shall make payment through the purchase of 0.07 acre of Re-established River: Wetland Waters of the U.S./State credits from the San Luis Rey Mitigation Bank to achieve a no-net-loss. Unavoidable impacts to jurisdictional waters would require a 1602 Permit Authorization from CDFW.

Paleontological Resources

PALEO-1: Paleontological Monitoring

I. Prior to Permit Issuance

A. Entitlements Plan Check

1. Prior to issuance of any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits or a Notice to Proceed for Subdivisions, but prior to the first preconstruction meeting, whichever is applicable, the Assistant Deputy Director (ADD) Environmental designee shall verify that the requirements for Paleontological Monitoring have been noted on the appropriate construction documents.

B. Letters of Qualification have been submitted to ADD

1. The applicant shall submit a letter of verification to Mitigation Monitoring Coordination (MMC) identifying the Principal Investigator (PI) for the project and the names of all persons involved in the paleontological monitoring program, as defined in the City of San Diego Paleontology Guidelines.
2. MMC will provide a letter to the applicant confirming the qualifications of the PI and all persons involved in the paleontological monitoring of the project.
3. Prior to the start of work, the applicant shall obtain approval from MMC for any personnel changes associated with the monitoring program.

II. Prior to Start of Construction

A. Verification of Records Search

1. The PI shall provide verification to MMC that a site-specific records search has been completed. Verification includes but is not limited to a copy of a confirmation letter from San Diego Natural History Museum, other institution or, if the search was in-house, a letter of verification from the PI stating that the search was completed.
2. The letter shall introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities.

B. PI Shall Attend Preconstruction (Precon) Meetings

1. Prior to beginning any work that requires monitoring; the Applicant shall arrange a Precon Meeting that shall include the PI, Construction Manager (CM) and/or Grading Contractor, Resident Engineer (RE), Building Inspector (BI), if appropriate, and MMC. The qualified paleontologist shall attend any grading/excavation related Precon Meetings to make comments and/or suggestions concerning the Paleontological Monitoring program with the Construction Manager and/or Grading Contractor.
   a. If the PI is unable to attend the Precon Meeting, the Applicant shall schedule a focused Precon Meeting with MMC, the PI, RE, CM or BI, if appropriate, prior to the start of any work that requires monitoring.
2. Identify Areas to be Monitored: Prior to the start of any work that requires monitoring, the PI shall submit a Paleontological Monitoring Exhibit (PME) based on the appropriate construction documents (reduced to 11x17) to MMC identifying the areas to be monitored including the delineation of grading/excavation limits. The PME shall be based on the results of a site-specific records search as well as information regarding existing known soil conditions (native or formation).

3. When Monitoring Will Occur
    a. Prior to the start of any work, the PI shall also submit a construction schedule to MMC through the RE indicating when and where monitoring will occur.
    b. The PI may submit a detailed letter to MMC 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 conditions such as depth of excavation and/or site graded to bedrock, presence or absence of fossil resources, etc., which may reduce or increase the potential for resources to be present.

III. During Construction

A. Monitor Shall be Present During Grading/Excavation/Trenching
    1. The monitor shall be present full-time during grading/excavation/trenching activities as identified on the PME that could result in impacts to formations with high and moderate resource sensitivity. **The Construction Manager is responsible for notifying the RE, PI, and MMC of changes to any construction activities such as in the case of a potential safety concern within the area being monitored. In certain circumstances OSHA safety requirements may necessitate modification of the PME.**
    2. The PI may submit a detailed letter to MMC during construction requesting a modification to the monitoring program when a field condition such as trenching activities that do not encounter formational soils as previously assumed, and/or when unique/unusual fossils are encountered, which may reduce or increase the potential for resources to be present.
    3. The monitor 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 discoveries. The RE shall forward copies to MMC.

B. Discovery Notification Process
    1. In the event of a discovery, the Paleontological Monitor shall direct the contractor to temporarily divert trenching activities in the area of discovery and immediately notify the RE or BI, as appropriate.
    2. The Monitor shall immediately notify the PI (unless Monitor is the PI) of the discovery.
    3. The PI shall immediately notify MMC by phone of the discovery and shall also submit written documentation to MMC within 24 hours by fax or email with photos of the resource in context, if possible.

C. Determination of Significance
    1. The PI shall evaluate the significance of the resource.
        a. The PI shall immediately notify MMC by phone to discuss significance determination and shall also submit a letter to MMC indicating whether additional mitigation is required. The determination of significance for fossil discoveries shall be at the discretion of the PI.
        b. If the resource is significant, the PI shall submit a Paleontological Recovery Program (PRP) and obtain written approval from MMC. Impacts to significant resources must be mitigated before ground disturbing activities in the area of discovery will be allowed to resume.

c. If resource is not significant (e.g., small pieces of broken common shell fragments or other scattered common fossils) the PI shall notify the RE, or BI as appropriate, that a non-significant discovery has been made. The Paleontologist shall continue to monitor the area without notification to MMC unless a significant resource is encountered.
d. The PI shall submit a letter to MMC indicating that fossil resources will be collected, curated, and documented in the Final Monitoring Report. The letter shall also indicate that no further work is required.

IV. Night and/or Weekend Work

A. If night and/or weekend work is included in the contract
   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.
      a. No Discoveries: In the event that no discoveries were encountered during night and/or weekend work, The PI shall record the information on the CSVR and submit to MMC via fax by 8AM on the next business day.
      b. Discoveries: All discoveries shall be processed and documented using the existing procedures detailed in Sections III - During Construction.
      c. Potentially Significant Discoveries: If the PI determines that a potentially significant discovery has been made, the procedures detailed under Section III–During Construction shall be followed.
      d. The PI shall immediately contact MMC, or by 8AM on the next business day to report and discuss the findings as indicated in Section III-B, unless other specific arrangements have been made.

B. If night work becomes necessary during the course of construction
   1. The Construction Manager shall notify the RE, or BI, as appropriate, a minimum of 24 hours before the work is to begin.
   2. The RE, or BI, as appropriate, shall notify MMC immediately.

C. All other procedures described above shall apply, as appropriate.

V. Post Construction

A. Preparation and Submittal of Draft Monitoring Report
   1. The PI shall submit two copies of the Draft Monitoring Report (even if negative), prepared in accordance with the Paleontological Guidelines which describes the results, analysis, and conclusions of all phases of the Paleontological Monitoring Program (with appropriate graphics) to MMC for review and approval within 90 days following the completion of monitoring,
      a. For significant paleontological resources encountered during monitoring, the Paleontological Recovery Program shall be included in the Draft Monitoring Report.
      b. Recording Sites with the San Diego Natural History Museum
      The PI shall be responsible for recording (on the appropriate forms) any significant or potentially significant fossil resources encountered during the Paleontological Monitoring Program in accordance with the City's Paleontological Guidelines, and submittal of such forms to the San Diego Natural History Museum with the Final Monitoring Report.

2. MMC shall return the Draft Monitoring Report to the PI for revision or, for preparation of the Final Report.
3. The PI shall submit revised Draft Monitoring Report to MMC for approval.
4. MMC shall provide written verification to the PI of the approved report.
5. MMC shall notify the RE or BI, as appropriate, of receipt of all Draft Monitoring Report submittals and approvals.

B. Handling of Fossil Remains
1. The PI shall be responsible for ensuring that all fossil remains collected are cleaned and catalogued.
2. The PI shall be responsible for ensuring that all fossil remains are analyzed to identify function and chronology as they relate to the geologic history of the area; that faunal material is identified as to species; and that specialty studies are completed, as appropriate

C. Curation of fossil remains: Deed of Gift and Acceptance Verification
1. The PI shall be responsible for ensuring that all fossil remains associated with the monitoring for this project are permanently curated with an appropriate institution.
2. The PI shall include the Acceptance Verification from the curation institution in the Final Monitoring Report submitted to the RE or BI and MMC.

D. Final Monitoring Report(s)
1. The PI shall submit two copies of the Final Monitoring Report to MMC (even if negative), within 90 days after notification from MMC that the draft report has been approved.
2. The RE shall, in no case, issue the Notice of Completion until receiving a copy of the approved Final Monitoring Report from MMC which includes the Acceptance Verification from the curation institution.

VII. SIGNIFICANT UNMITIGATED IMPACTS

The CPUs Final PEIR indicated that significant impacts to the following issue areas would be substantially lessened or avoided if all the proposed mitigation measures recommended in the Final PEIR were implemented: land use; biological resources; hydrology and water quality; historical resources; paleontological resources; and geology and seismic hazards. The Final PEIR further concluded that significant impacts related to air quality, noise, and transportation, would not be fully mitigated to below a level of significance. With regard to cumulative impacts, implementation of the CPUs Final PEIR would result in significant impacts related to transportation, air quality, and noise, which would remain significant and unmitigated. As there were significant unmitigated impacts associated with the original project approval, the decision maker was required to make specific and substantiated "CEQA Findings". Given that there are no new or more severe significant impacts that were not already addressed in the previous certified Final PEIR, new CEQA Findings and/or Statement of Overriding Considerations are not required.

The project would not result in any additional significant impacts nor would it result in an increase in the severity of impacts from that described in the previously certified Final PEIR.

VIII. CERTIFICATION

Copies of the addendum, the certified CPUs Final PEIR, the MMRP, and associated project-specific technical appendices, if any, may be accessed on the City's CEQA webpage at https://www.sandiego.gov/ceqa/final.

Jeff Szymanski

Jeff Szymanski, Senior Planner
Development Services Department

12/12/23

Date of Final Report

Attachments:

- Figure 1: Regional Location
- Figure 2: Project Location on USGS Map
- Figure 3: Project Location on City 800' Map
- Figure 4: Project Location on Aerial Photograph
- Figure 5: Site Plan
- Figure 6: Proposed Drainage

REFERENCES

Applied Consultants

2018 Geotechnical Investigation for the Euclid Avenue Project Located between Trinidad Way and La Paz Drive in San Diego, CA 92114 APN: 548-430-28-00. September 18.

2021 Addendum Geotechnical Report in response to 2 LDR-Geology Cycle Issues dated May 11, 2021 for the Euclid Terrace Project located between Trinidad Way and La Paz Drive in San Diego, CA 92114 APN: 548-430-28-00 PTS#675101. October 19.

California Department of Transportation (Caltrans)

2013 Technical Noise Supplement. November.

California Energy Commission (CEC)

2021 Draft Environmental Impact Report for Amendments to the Building Energy Efficiency Standards (2022 Energy Code). State Clearinghouse Number 2021030504. May 19.

California Public Utilities Commission

2020 2020 California Renewables Portfolio Standard Annual Report.

Federal Highway Administration (FHWA)

2011 Highway Traffic Noise: Analysis and Abatement Guidance. FHWA-HEP-10-025. December.

Office of Environmental Health Hazard Assessment (OEHHA)

2015 Air Toxics Hot Spots Program Guidance Manual for the Preparation of Risk Assessments (Guidance Manual), February.

RECON Environmental, Inc. (RECON)

2022a Biological Resources Report for the Euclid Terrace Project. December 16.

2022b Air Quality CalEEMod Emission Calculation Output. November 4.

2022c Noise Analysis for the Euclid Terrace Project. RECON Number 9215. March 21.

2022d Wetland/Waters Delineation Report for the Euclid Terrace Project. March 22

2022e Historical Resources Survey for the Euclid Terrace Project. November 14.

2022f Waste Management Plan. May 16.

San Diego Association of Governments (SANDAG)

2002 (Not So) Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region. April.

2021 Transportation Forecast Information Center. Series 14. Accessed at http://tfic.sandag.org/. October 26, 2021.

San Diego, City of

1997 Multiple Species Conservation Plan. City of San Diego MSCP Subarea Plan. March.

2015 Southeastern San Diego and Encanto Neighborhoods Community Plan Updates Project Final Program Environmental Impact Report, Oct 2015

2018 Land Development Code Biology Guidelines. Adopted September 1999. Last amended February 1, 2018 by Resolution No. R-311507. Available at https://www.sandiego.gov/sites/default/files/amendment_to_the_land_development_manual_biology_guidelines_february_2018_-_clean.pdf

2021 San Diego Municipal Code Section 143.0140 Purpose of Environmentally Sensitive Lands Regulations. March.

2022 California Environmental Quality Act Significance Determination Thresholds. September.

U.S. Army Corps of Engineers (USACE)

1987 Corps of Engineers Wetlands Delineation Manual. Technical Report Y-87-1, Department of the Army. January.

2008 Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West Region. September.

RECON

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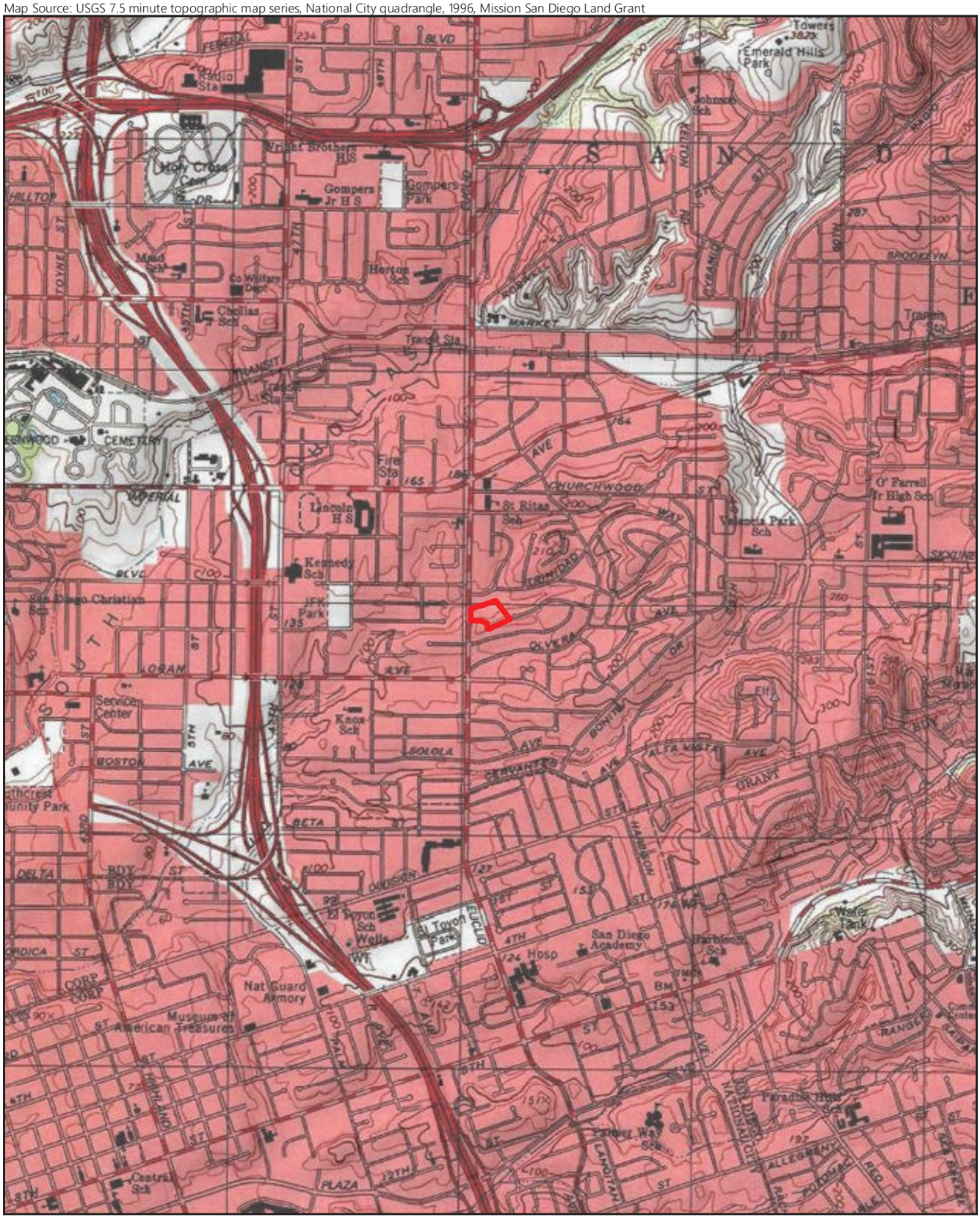
FIGURE 1
Regional Location

Map Source: USGS 7.5 minute topographic map series, National City quadrangle, 1996, Mission San Diego Land Grant



Project Boundary

RECON

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FIGURE 2
Project Location on USGS Map

Map Source: City of San Diego, Engineering and Development Department, City 800' Maps, Number 210-1701

Project Boundary

FIGURE 3

Project Location on City 800' Map

RECON

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Image Source: NearMap (flown April 2022)

Project Boundary

RECON

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FIGURE 4
Project Location on Aerial Photograph

Map Source: Polaris Development Consultants

0 Feet 40

RECON

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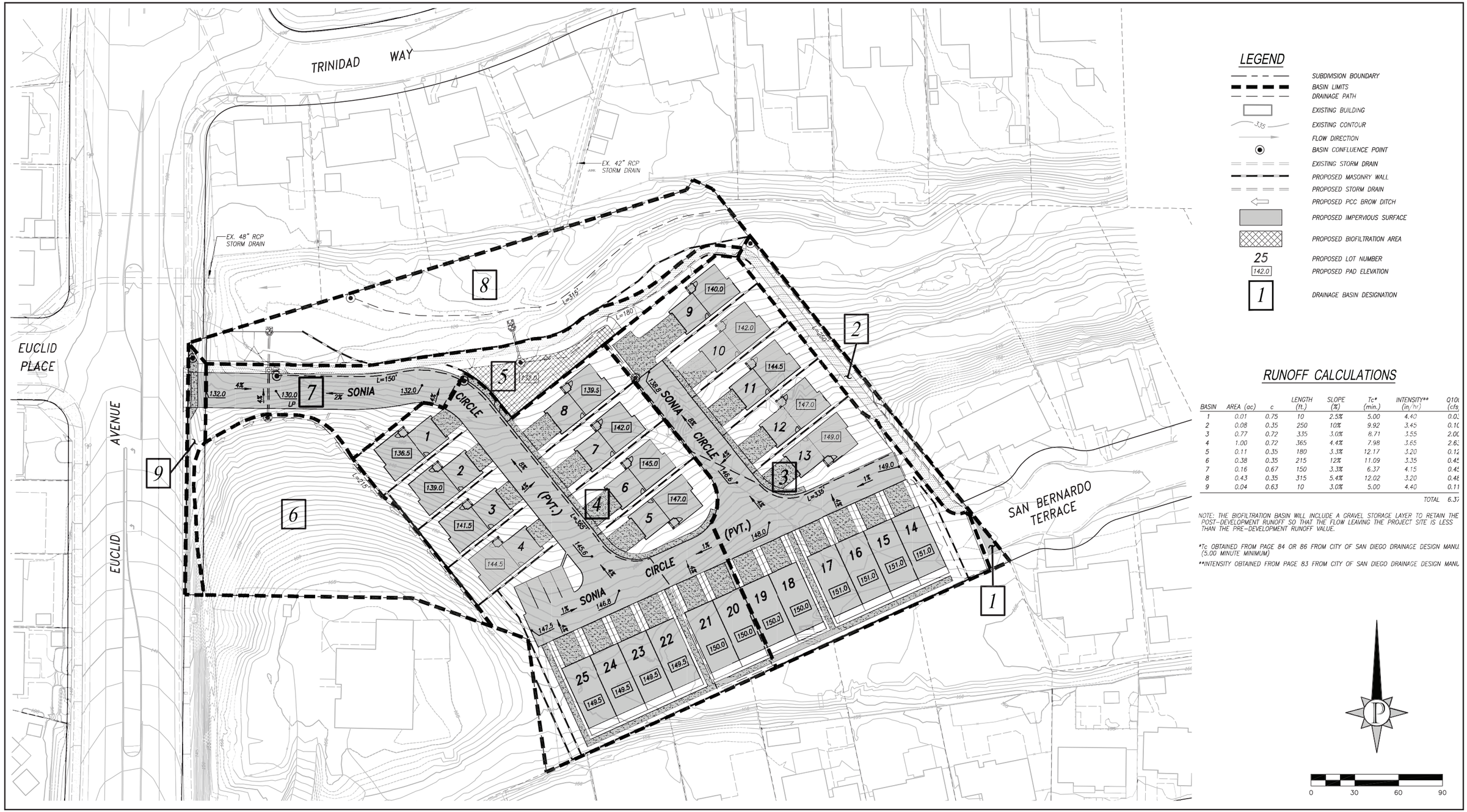
FIGURE 5
Site Plan

Map Source: Polaris Development Consultants, Inc.



LEGEND

- SUBDIVISION BOUNDARY
- BASIN LIMITS
- DRAINAGE PATH
- EXISTING BUILDING
- 335 EXISTING CONTOUR
- FLOW DIRECTION
- BASIN CONFLUENCE POINT
- EXISTING STORM DRAIN
- PROPOSED MASONRY WALL
- PROPOSED STORM DRAIN
- PROPOSED PCC BROW DITCH
- PROPOSED IMPERVIOUS SURFACE
- PROPOSED BIOFILTRATION AREA
- 25 PROPOSED LOT NUMBER
- 142.0 PROPOSED PAD ELEVATION
- 1 DRAINAGE BASIN DESIGNATION

RUNOFF CALCULATIONS

BASIN	AREA (ac)	c	LENGTH (ft.)	SLOPE (%)	Tc* (min.)	INTENSITY** (in/hr)	Q10((cfs
1	0.01	0.75	10	2.5%	5.00	4.40	0.0
2	0.08	0.35	250	10%	9.92	3.45	0.1(
3	0.77	0.72	335	3.0%	8.71	3.55	2.0(
4	1.00	0.72	365	4.4%	7.98	3.65	2.6
5	0.11	0.35	180	3.3%	12.17	3.20	0.1
6	0.38	0.35	215	12%	11.09	3.35	0.4
7	0.16	0.67	150	3.3%	6.37	4.15	0.4
8	0.43	0.35	315	5.4%	12.02	3.20	0.4
9	0.04	0.63	10	3.0%	5.00	4.40	0.1
						TOTAL	6.3

NOTE: THE BIOFILTRATION BASIN WILL INCLUDE A GRAVEL STORAGE LAYER TO RETAIN THE POST-DEVELOPMENT RUNOFF SO THAT THE FLOW LEAVING THE PROJECT SITE IS LESS THAN THE PRE-DEVELOPMENT RUNOFF VALUE.

*Tc OBTAINED FROM PAGE 84 OR 86 FROM CITY OF SAN DIEGO DRAINAGE DESIGN MANU (5.00 MINUTE MINIMUM)

**INTENSITY OBTAINED FROM PAGE 83 FROM CITY OF SAN DIEGO DRAINAGE DESIGN MANU

0 30 60 90

RECON

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FIGURE 6
Proposed Drainage