



THE CITY OF SAN DIEGO

ADDENDUM

Addendum to PEIR SCH No. 2021070359

SUBJECT: College Area Community Plan Update: The College Area Community Plan Update (CPU; project) entails a comprehensive update to the existing College Area Community Plan that was adopted in 1989 and last amended in 2019. The College Area CPU establishes an updated vision and strategy to guide future growth and development within the College Area community in the City of San Diego (City) over the next 30 plus years. The proposed CPU aligns with the City's amended General Plan (Blueprint SD Initiative) policy and land use framework and the City of Villages land use strategy as well as the policy direction of the citywide Climate Action Plan (CAP). The proposed CPU aims to reinforce the community's role as a college town with vibrant mixed-use corridors and nodes that connect to neighborhoods and San Diego State University (SDSU). The College Area CPU provides more opportunities for homes, jobs, and mixed-use development and community villages connected to SDSU; retail and employment centers; residential areas; public spaces; and bus and trolley stations while also focusing on other aspects, such as protecting natural resources, open space, and biodiversity. The proposed CPU envisions growth near SDSU and along transportation corridors, with new mixed-use development occurring on pedestrian-oriented streetscapes and connections to the neighborhoods. The proposed College Area CPU contains ten elements, including Introduction; Land Use; Mobility; Urban Design; Economic Prosperity; Recreation; Open Space & Conservation; Public Facilities, Services & Safety; Historic Preservation; and Implementation. These elements contain specific goals and policies that provide direction on what types of future uses and public improvements should be developed in the College Area community. Applicant: City of San Diego City Planning Department.

I. SUMMARY OF ORIGINAL PROJECT

On July 23, 2024, the City Council adopted the Blueprint SD Initiative (also known as the General Plan Refresh), which included a comprehensive amendment to the City's General Plan to address the adopted Climate Action Plan (CAP; City 2022a) and the San Diego Association of Governments' (SANDAG's) 2021 Regional Plan (SANDAG 2021). The Blueprint SD Initiative is a proactive effort to create an equitable and sustainable framework for growth to support current and future residents and the City's priority to develop homes near public transportation and job centers.

A Program Environmental Impact Report (PEIR) (State Clearinghouse [SCH] No. 2021070359) was prepared for the Blueprint SD Initiative, Hillcrest Focused Plan Amendment (FPA) to the Uptown Community Plan, and University Community Plan Update (CPU) and Local Coastal Program (LCP) Update, and was certified by the City of San Diego City Council in July 2024 (referenced hereinafter as the Blueprint SD PEIR). The Blueprint SD PEIR was prepared in compliance with the California Environmental Quality Act (CEQA) Statute and Guidelines (Public Resources Code [PRC], Section 21000 et seq. and California Code of Regulations [CCR], Title 14, Section 15000, et seq.) and in accordance with the City's CEQA Significance Determination Thresholds (City 2022b). The three components addressed in the Blueprint SD PEIR are briefly described below.

Blueprint SD Initiative

The Blueprint SD Initiative included a comprehensive amendment to the General Plan to better align the City of Villages Strategy to reflect the latest goals, policies, and plans for housing, environmental protection, climate change adaptation, and sustainable growth. The Blueprint SD Initiative amended the General Plan to include an updated citywide land use framework designed around SANDAG's 2021 Regional Plan to promote reductions in per capita greenhouse gas (GHG) emissions and vehicle miles traveled (VMT). It also identified complementary land use, transportation, and related policies to support future development according to the revised land use framework. The land use and policy amendments build on climate goals outlined in the City's CAP and Climate Resilient SD Plan.

The updated policy and land use framework applies to development citywide and is intended to guide future land use plan updates, such as CPUs, Specific Plans, FPAs, and future Land Development Code (LDC) amendments to facilitate the implementation of the General Plan. The policy and land use framework in the General Plan is defined by the Village Climate Goal Propensity Map (Figure LU-1 of the General Plan Land Use and Community Planning Element), which identifies village propensity values throughout the City ranging from low to high (1 through 14). The Blueprint SD PEIR identifies Climate Smart Village Areas, which are areas of the City with propensity values ranging from 7 through 14. These Climate Smart Village Areas are areas that have good access to homes, jobs, and mixed-use destinations and that are in proximity to high-frequency transit services; have transit access to job centers; and have good connections between transit and destinations. The Village Climate Goal Propensity Map is intended to guide the development of future CPUs, Specific Plans, and FPAs, which would primarily focus future increases in development intensities that support higher density residential and mixed-use development within these Climate Smart Village Areas. Although opportunities for new homes and jobs would likely be focused in these Climate Smart Village Areas, future CPUs, Specific Plans, and FPAs could also plan for more opportunities for homes and jobs outside these Climate Smart Village Areas where considered appropriate for the surrounding area and if in alignment with the General Plan's land use and policy framework.

The General Plan, amended by the Blueprint SD Initiative, included updates to the following elements to reflect more current conditions, updated data sources, and the latest City plans and policies while continuing to maintain the framework of the General Plan and City of Villages Strategy:

- ***Land Use and Community Planning Element:*** Includes updated land use designations, revised density ranges, new and updated goals, and new and updated policies consistent with the City of Villages Strategy to meet housing, environmental protection, climate change

adaptation, and sustainable growth goals.

- **Mobility Element:** Reflects SANDAG's 2021 Regional Plan (2023 Amendment) and the updated transportation network and includes an updated land use and transportation planning policy framework to encourage Complete Streets planning principles and concepts that will result in dynamic, vibrant corridors that support all modes of travel.
- **Urban Design Element:** Includes updates to goals and policies to promote the use of objective and measurable development standards to align with changes in state law.
- **Economic Prosperity Element:** Includes updated policies to reflect the changes to the Land Use and Community Planning Element and provides greater flexibility to co-locate industrial uses with housing especially workforce housing.
- **Public Facilities, Services, and Safety Element:** Includes amendments to remove reference to the City's previous Capital Improvement Program Prioritization process to reflect the adoption of Build Better SD, and changes to address Senate Bill (SB) 99, which requires Safety Elements to identify residential developments in any hazard area that do not have at least two emergency evacuation routes, and Assembly Bill (AB) 747, which requires jurisdictions to identify evacuation routes and their capacity, safety, and viability under various emergency scenarios.
- **Recreation Element:** Includes an updated Figure RE-1, Community Plan Designated Open Space and Parks Map, which includes updates to military uses, and neighborhood, community, regional, and open space parks.
- **Conservation Element:** Incorporates updated policies to align the City's conservation framework with the revised land use strategy and the goals of the CAP, Climate Resilient SD Plan, Multiple Species Conservation Program (MSCP) Subarea Plan (SAP), and Vernal Pool Habitat Conservation Plan (VPHCP), as well as updates to Table CE-1 and Figures CE-1 through CE-6 to reflect current conditions and the most up-to-date data.
- **Noise Element:** Includes updated noise compatibility policies related to multiple dwelling units; vehicle and vehicular equipment sales and services use; wholesale, distribution, and storage use; and industrial use to support the revised land use strategy in the Land Use and Community Planning Element.

The Appendices and Glossary were also updated. No updates or changes were made to the Historic Preservation Element. The Historic Preservation Element was last updated in 2008 and is being updated as a part of a citywide historic resources planning effort. A separate General Plan amendment will be processed by the City for this effort.

At the time of preparation of the Blueprint SD Initiative, the City was in the process of preparing an Environmental Justice Element. The Environmental Justice Element was determined to be consistent with the Final PEIR for the General Plan (Project No. 104495/SCH No. 2006091032) under CEQA Guidelines Section 15162, and was incorporated as an amendment to the General Plan on July 1, 2024 as a separate action from and prior to adoption of the Blueprint SD Initiative. Thus, the Blueprint SD Initiative did not include any changes to the Environmental Justice Element. Pursuant to CEQA Guidelines Section 15150, this environmental document incorporates by reference the environmental analysis for the Environmental Justice Element.

Hillcrest Focused Plan Amendment

The Hillcrest FPA included an amendment to the Uptown Community Plan to re-designate approximately 380 acres of the Hillcrest and Medical Complex neighborhoods with land uses that follow a similar pattern to the planned land uses from the 2016 Uptown CPU with increases to the planned residential density and non-residential development capacity. The amendment provides the opportunity for additional homes in the Hillcrest FPA area and is intended to encourage active transportation and provide more opportunities for quality public spaces. By providing the opportunity for additional homes near the employment center of the Medical Complex neighborhood, in an area with access to high frequency public transit and coupled with mobility improvements, the Hillcrest FPA is intended to encourage active transportation use and reduce automobile trips for work commutes.

The Hillcrest FPA increased the residential unit capacity within the Hillcrest FPA area by approximately 17,218 units. Similarly, the Hillcrest FPA increased the capacity for non-residential floor area by approximately 1,037,600 square feet (SF), all of which is allocated for institutional/medical land uses.

The Hillcrest FPA also included the following components:

- Updates to reflect the latest City and regional planning and land use and policy framework, including updated references to the General Plan, CAP, Parks Master Plan, Climate Resilient SD, Library Master Plan, and SANDAG 2021 Regional Plan.
- Updates to reflect current population and existing conditions information.
- Land use policy changes to facilitate implementation of the Hillcrest FPA.
- A new LGBTQ+ Cultural chapter to support and highlight the people, spaces, buildings, events, and physical elements that contribute to the history and culture of the LGBTQ+ community in Hillcrest.

Amendments to reflect these changes were made to the Land Use; Mobility; Urban Design; Economic Prosperity; Public Facilities, Services, and Safety; Recreation; Conservation; Noise; Historic Preservation; and Implementation chapters of the Uptown Community Plan. Specific changes include:

- **Land Use:** The Hillcrest FPA added the Residential – Multiple Unit (RM)-4-11 base zone to the Hillcrest FPA area which will allow for 110-218 dwelling units per acre and a Floor Area Ratio (FAR) of 7.2. The Hillcrest FPA also created two new base zones in the Uptown Community Plan to allow for higher residential density land uses and zone categories associated with the Community Commercial (CC) (Residential Permitted) land use designation. The Land Use chapter also provided definitions for Urban Villages and Neighborhood Villages and clarified that certain policies relating to high intensity commercial, mixed-use development, and “active” commercial business uses apply to Urban Village areas.
- **Mobility:** The Mobility chapter was amended to reflect the City’s latest policy direction regarding mobility with a focus on reductions in per capita VMT in order to be consistent with the City’s CAP.

- **Urban Design:** Changes to the Urban Design chapter included new descriptions of promenades and public space design to be consistent with the Parks Master Plan.
- **LGBTQ+ Cultural:** The Hillcrest FPA included the addition of this new chapter, as noted above.
- **Economic Prosperity:** The Hillcrest FPA amended the Economic Prosperity chapter to reflect updated goals and policies recognizing and protecting Hillcrest's unique role and to recognize the new LGBTQ+ Cultural District. The updated chapter includes a new policy (EP-2.4) to support a certification or recognition program for places and events within the LGBTQ+ Cultural District that are tied to protections and incentives to strengthen establishments and minimize the potential loss of valued institutions. This chapter was also updated to include updates to employment and economic data within the Uptown Community Plan area.
- **Public Facilities, Services, and Safety:** Amendments were made to this chapter to reflect updated City data related to public services and facilities, and to incorporate the mobility and infrastructure goals of the CAP as well as updated approaches to funding facilities consistent with Build Better SD.
- **Recreation:** Amendments to this chapter were made to incorporate updates based on the latest park data, updates to reflect adoption of the Parks Master Plan, and updated standards for parks and recreation facilities.
- **Conservation:** This chapter was amended to reflect updates to the City's 2022 CAP regarding the six strategies of the CAP and to update references to policies in the General Plan Conservation Element.
- **Noise:** The Noise chapter was amended to add a new policy (NE-1.5) which encourages the upfront disclosure of noise levels in mixed-use and residential developments near commercial/entertainment areas during property sales or lease agreements. Policy NE-1.22 was also amended to clarify that the establishment of a "buffer zone" between the location of special events and Sixth Avenue should be considered with the exception of the Pride festival and parade.
- **Historic Preservation:** Amendments to this chapter were made to incorporate the latest data regarding the number of designated historical resources and the number of potential historic districts within the Uptown Community Plan area.
- **Implementation:** This chapter was amended to add a new section regarding Community Plan Implementation Overlay Zone (CPIOZ) implementation. The Hillcrest FPA amended the existing CPIOZ Type A – Building Heights in the Uptown Community Plan area and created three new CPIOZ Type A areas: the Hillcrest District, Hillcrest Historic District, and Commercial and Entertainment Activity Area.

University Community Plan Update and Local Coastal Program Update

The University CPU and LCP Update (hereinafter referred to as the University CPU) included a comprehensive update of the University Community Plan and established an updated vision and objectives that align with General Plan policies, including those amended by the Blueprint SD Initiative, as well as recently adopted policy direction from the CAP, Library Master Plan, Parks Master Plan, and Climate Resilient SD. The University CPU also took into consideration SANDAG's

2021 Regional Plan. The University CPU identified guiding principles, plan goals and policies, and identified procedures for plan implementation.

The University CPU updated the land use plan for the University Community Plan area to help achieve the desired vision and objectives for the community. The changes to the University Community Plan land use plan addressed the demand for homes and jobs and reflected the recent extension of the UC San Diego Metropolitan Transit System (MTS) Blue Line Trolley service to UC San Diego and other existing and planned transit services. Implementation of the University CPU would result in an overall community-wide increase of approximately 29,000 additional planned residential units and approximately 36,800,000 SF of planned non-residential floor area, including increases in industrial park/research and development and commercial uses and a decrease in light industry/warehouse uses.

The University CPU included the following components:

- ***Vision and Land Use Framework:*** This chapter establishes the overarching priorities and land use plan for the University Community Plan area. The land use framework balances climate goals with the need for sustainable economic growth by focusing higher density and intensity land uses around transit and job centers. Planned land uses support employment and commercial activity and introduce residential areas through a new Urban Village land use designation.
- ***Urban Design:*** This chapter provides guidance to encourage the transformation of the community from an auto-centric area with separated land uses into a connected, mixed-use, transit-oriented community centered around a rich and vibrant public realm. The Urban Design chapter promotes transit-oriented development by focusing new development near transit infrastructure to promote walkability and accessibility.
- ***Mobility:*** This chapter promotes improving active transportation options, increasing transit accessibility, and embracing intelligent technologies and management strategies to help encourage more people to walk/roll, bike, or ride transit, and decrease their auto dependence. The Mobility chapter identifies mobility improvements such as planned bicycle classification modifications, planned transit, potential transit, and planned roadway classification modifications. The proposed mobility improvements support increased active transportation facilities to provide enhancements to streetscapes and street functionality that support pedestrian, bicycle, and transit activity and complete streets features wherever possible.
- ***Parks and Recreation:*** This chapter promotes a well-connected system of parks, recreational facilities, and open space that provides opportunities for passive and active recreation, social interaction, community gatherings, the enhancement of the public realm, and the protection of sensitive natural resources. The Parks and Recreation chapter promotes trail maintenance and improvements, the enhancement of existing parks to increase their recreational value, and the addition of new parks, either through the acquisition of public parkland, the redevelopment of City-owned sites and rights-of-way, or development in collaboration with new residential developments and improvements to the public realm.
- ***Open Space and Conservation:*** This chapter promotes the preservation and enhancement of natural resources within the University Community Plan area. Multi-Habitat Planning Area

(MHPA) Boundary Line Corrections (BLCs) were proposed as part of the University CPU to add City-owned lands into the City's MHPA to increase the City's overall conservation acreage. The University CPU additionally proposed to dedicate several City-owned properties as open space pursuant to Charter Section 55 to provide a continuous connection of MHPA lands by connecting existing City-owned open space and private open space easements.

- **Historic Preservation:** This chapter provides a summary of the prehistory and history of the University Community Plan area. The Historic Preservation chapter is guided by the General Plan for the preservation, protection, restoration, and rehabilitation of historical, archaeological, and tribal cultural resources throughout the plan area.
- **Public Facilities, Services, and Safety:** This chapter illustrates existing and planned public facilities in the University Community Plan area and identifies existing and potential public, semi-public, and community facilities and services, public utilities, and safety considerations.
- **Implementation:** This chapter includes policies which provide specific direction, practice, guidance, and directives to support and implement the University CPU's land use, mobility, urban design, parks, and public facilities goals. These policies, combined with the zoning regulations in the LDC, provide a policy and regulatory framework to guide development within the University Community Plan area.

Intended Use of the Blueprint SD PEIR for Future Planning Documents

The Environmental Impact Report (EIR) prepared for the Blueprint SD Initiative, Hillcrest FPA, and University CPU was a PEIR. As defined in CEQA Guidelines Section 15168, a PEIR is prepared for a series of actions that are characterized as one large project through reasons of geography; as logical parts in the chain of contemplated actions; in connection with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program; or where individual activities will occur under the same regulatory process and having generally similar environmental impacts that can be mitigated in similar ways. A PEIR was prepared for the Blueprint SD Initiative because its implementation would result in the adoption of future CPUs, Specific Plans, and/or FPAs that are consistent with the General Plan policy and land use framework.

In accordance with CEQA Guidelines Section 15168, a PEIR may serve as the EIR for subsequent activities or implementing actions, provided it contemplates and adequately analyzes the potential environmental impacts of those subsequent projects. If, in examining future actions within the Blueprint SD Initiative's area, the City finds no new effects could occur or no new mitigation measures would be required other than those analyzed and/or required in the Blueprint SD PEIR, the City can approve the activity as being within the scope covered by the Blueprint SD PEIR and no new environmental documentation would be required.

A specific objective of the Blueprint SD PEIR is to, "(s)treamline the environmental review process for future planning documents to expedite the implementation of plans that facilitate the development of housing and infrastructure that meet the City's needs and further the CAP goals." The adoption of future CPUs, Specific Plans, FPAs, and/or LDC amendments are anticipated future actions to be implemented consistent with the General Plan land use and policy framework, including the Village Climate Goal Propensity Map and City of Villages Strategy. These future CPUs, Specific Plans, FPAs, and/or LDC amendments could be evaluated in a streamlined manner consistent with CEQA Guidelines Sections 15162, 15163, 15164, and/or 15183.

Since the adoption of the General Plan in 2008, the City has been in the process of updating community plans to be consistent with the City of Villages Strategy and, since 2015, the CAP. The overarching goals of recent CPUs have focused on maximizing density within Transit Priority Areas (TPA) and VMT efficient areas, ensuring mobility plans provide for all modes of travel, and providing a land use and mobility framework consistent with the City of Villages Strategy and CAP. The City anticipates updating and/or amending community plans to reflect the updated Village Climate Goal Propensity Map and land use and policy framework, as well as other recent Citywide plans and policies.

The previous approach to completing the CEQA review process for prior CPUs was to prepare a PEIR for each CPU. Under this approach, it was found that the environmental analysis for the CPUs had similar environmental impacts and similar mitigation frameworks. As a result of this process, the City identified an opportunity to address the environmental analysis and CEQA compliance for future CPUs as part of the CEQA analysis and documentation for the Blueprint SD Initiative. Future CPUs, Specific Plans, FPAs, and/or LDC amendments, and future development consistent with those plans, can be evaluated for consistency with the General Plan land use and policy framework, including the Village Climate Goal Propensity Map and the City of Villages Strategy, and thus, could also be evaluated for consistency with the Blueprint SD PEIR. As future CPUs or other plans are updated and/or amended, and as future public and/or privately initiated development projects are proposed that are consistent with the General Plan policy and land use framework, these would be evaluated in light of CEQA Guidelines Sections 15152, 15153, 15162, 15163, 15164, 15168, and/or 15183.

A total of 17 community plans have been comprehensively updated and/or have undergone an FPA since 2008. The Blueprint SD PEIR states that recently updated community plans and those that need an update could be amended in the future and, if these updates and amendments are consistent with the General Plan land use and policy framework including the Village Climate Goal Propensity Map, could also be evaluated for consistency with the Blueprint SD PEIR. It also specifically identifies the College Area CPU as being in process and anticipated it would be evaluated for consistency with the Village Climate Goal Propensity Map and the Blueprint SD PEIR.

II. SUMMARY OF PROPOSED PROJECT

The proposed College Area CPU (project) is a comprehensive update to the existing College Area Community Plan that was adopted in 1989. The College Area CPU establishes an updated vision and land use and policy strategy to guide future growth and development within the College Area community. The proposed CPU aligns with the City's amended General Plan (Blueprint SD Initiative) land use and policy framework and the City of Villages land use strategy as well as the policy direction of the citywide CAP. The proposed CPU aims to reinforce the community's role as a college town with vibrant mixed-use corridors and nodes that connect to employment centers, neighborhoods, and San Diego State University (SDSU), and that enhance the community.

Guiding principles identified in the College Area CPU include the following:

- Buildings, streets, parks and public spaces that provide places to gather, enhance community identity and promote sustainability and livability.

- Diverse and accessible housing opportunities near the East Campus Medical Center at UC San Diego Health, SDSU, transit corridors, and activity centers.
- Safe, enjoyable, and efficient travel that makes it easy to travel without a car.
- A thriving, sustainable, and innovative business district that contributes to community vitality and growth.
- Strong connections to SDSU to promote community investment, including start-ups, craft businesses, and good jobs.
- Improved air quality, health, recreation, and connectivity between neighborhoods, parks, schools, businesses, the East Campus Medical Center at UC San Diego Health and SDSU.
- Preserved and expanded parks, open space, natural resources, and environmentally sensitive areas.
- A resilient and healthy community powered by renewable energy and an emissions-free transportation system.
- Spaces that support cultural exchange with the community, local businesses, schools, East Campus Medical Center at UC San Diego Health, SDSU, and other local arts organizations.
- Tree lined mixed-use corridors for people to walk and bike to nearby activity centers including shopping, jobs, schools, transit, parks, and SDSU.
- New buildings with restaurants, stores, offices and homes that can serve as spaces for people to gather and socialize.
- Opportunities for a variety of new homes for families to move into the community, create opportunities for seniors that wish to downsize and remain in the community and students living near the University.

The College Area CPU addresses all aspects of community development and provides recommendations to guide this development over the next 30 plus years. The College Area CPU provides for more opportunities for homes, jobs, and mixed-use development and community villages connected to SDSU; retail and employment centers; residential areas; public spaces; and bus and trolley stations while also focusing on other aspects, such as protecting natural resources, open space, and biodiversity. Since the College Area Community Plan's adoption in 1989, SDSU has evolved from primarily a commuter campus into a major university that draws students from beyond San Diego, and the area has emerged as a major transit corridor. As a result, the proposed CPU envisions growth along transportation corridors and near SDSU, with new mixed-use development occurring on pedestrian-oriented streetscapes with connections to neighborhoods, jobs, and parks. Increasing opportunities for homes near transit will assist in reducing vehicular travel by making it easier for more residents to use public transportation, which in turn reduces GHG emissions, furthering the City's climate goals. In addition, opportunities for new homes can promote development that supports new community investments, including new public spaces, new neighborhood commercial amenities, and enhanced places for people to enjoyably and safely walk, bike, and interact with their neighbors. Public facilities and infrastructure proposed under the College Area CPU include improvements to the pedestrian, bicycle, transit, and roadway network; enhancements to existing parks and recreational facilities; and the potential for new parks and public spaces through the acquisition of land, the reuse of City-owned land, and/or with new developments. Additional future public infrastructure improvements, such as public utilities and

facilities, could occur as part of the College Area CPU to accommodate future development in the CPU area.

The proposed College Area CPU contains ten elements, including an Introduction; Land Use; Mobility; Urban Design; Economic Prosperity; Recreation; Open Space & Conservation; Public Facilities, Services & Safety; Historic Preservation; and Implementation. Each of these elements contains specific goals and policies that provide direction on what types of future uses and public improvements should be developed in the College Area community. The following is a brief overview of the elements within the proposed College Area CPU:

- **Introduction:** The Introduction Element establishes the purpose, vision and guiding principles of the plan; it also describes the organization of the community plan and the relationship of the community plan with other Citywide and regional plans. See Figure 1, *Regional Location*, Figure 2, *USGS Topography*, and Figure 3, *Aerial Photograph*.
- **Land Use:** The Land Use Element establishes the land use framework for the community. The Community Plan envisions opportunities for homes and commercial uses along transit corridors within villages and nodes and adjacent to SDSU to support walking/rolling, biking and riding transit to conduct daily activities, including work, school, shopping, and play. Higher density mixed-use and residential uses would be focused along corridors and mixed-use villages and nodes and would transition to medium and lower density within the adjacent neighborhoods. A mix of uses and higher-density multi-family residential uses is proposed adjacent to SDSU to create a 'campus town' that serves as a community gateway and citywide landmark, and attracts students, faculty and staff and provides them with opportunities to live near campus. The CPU's land use plan also supports active pedestrian-oriented retail uses along corridors including El Cajon Boulevard, College Avenue and Montezuma Road. Potential development that could result from the planned land uses includes approximately 25,950 additional homes for a buildout total of approximately 34,150 homes. No net change in the adopted buildout amount of approximately 5,470,000 square feet (SF) of non-residential space is anticipated. Figure 4, *Proposed Land Use*, shows the proposed land use plan under the CPU. The Land Use Element also includes policies which address housing, mixed-use, commercial, and noise.
- **Mobility:** The Mobility Element envisions people being able to walk/roll, bike, and ride transit to public spaces, shops and services along corridors and within villages and nodes to help meet citywide climate goals. The CPU takes a "Complete Streets" approach to the College Area corridors by envisioning the development of streets that integrate features like bike lanes, pedestrian paths and public transit options. The CPU identifies pedestrian routes based on activity and encourages the development of improvements such as raised crosswalks, raised median pedestrian refuges, rectangular rapid flashing beacons, curb extensions, and signal timing modifications to create safe, more comfortable and accessible paths for people to walk/roll when traveling to destinations throughout the community and beyond (see Figure 5, *Planned Pedestrian Network*). Additionally, the CPU proposes an updated planned bicycle network throughout the community with an emphasis on separated bikeways, especially along major corridors, where feasible, and the inclusion of bicycle amenities such as bicycle parking, bikeshare, bike rentals, bike repair, signage, and

wayfinding (see Figure 6, *Planned Bicycle Network*). The planned bicycle network works together with the proposed roadway classifications to enhance circulation as shown in Figure 7, *Planned Street Classifications*. This includes the reconfiguration of El Cajon Boulevard and College Avenue to accommodate transit-only lanes. The proposed dedicated transit lanes on El Cajon Boulevard could also be used by bicyclists. The planned transit network in the CPU area is depicted in Figure 8, *Planned Transit Network*. Other potential mobility improvements which could occur include, but are not limited to, traffic calming measures such as roundabouts, mobility hubs, intelligent transportation systems, transportation demand management programs, and wayfinding and signage programs. Implementation of these mobility features and associated amenities could require roadway modifications, removal of parking, striping, slurry sealing, street resurfacing, sidewalk enhancements, landscaping, lighting, utility work, and the other related improvements that could occur as part of future public projects or private development. The Mobility Element also includes policies which address walking/rolling, bicycling, transit, streets, parking and curb management, freeways, and intelligent transportation systems.

- **Urban Design:** This element envisions buildings designed to enhance the pedestrian environment, with retail businesses along corridors and within villages and nodes, and a Campus Town Center adjacent to SDSU. The Campus Town Center is envisioned as a pedestrian-oriented, walkable streetscape, amenity rich neighborhood with urban greens, promenades, plazas and diverse building types. The urban design framework also encourages development with residential uses along corridors that will provide public spaces which can include recreational amenities; improvements to the pedestrian space including, but not limited to, wider parkways and sidewalks with shade trees, pedestrian lighting and new public spaces that provide places to gather; and the development of parkways and greenways that enhance connectivity and the pedestrian environment (see also the Community Enhancement Overlay Zone section, below). Urban greening, which uses native and drought-resistant plants and permeable surfaces along parkways and within public spaces, is proposed to help reduce flooding and watershed pollution while also improving the pedestrian environment. The Urban Design Element includes policies which address bulk and scale; materials; active building frontages; transitions; the Campus Town Center; community villages, activity nodes, and corridors; parking and vehicle access; urban greening; canyons and open space interface; and sustainable building design.
- **Economic Prosperity:** This element encourages new opportunities for retail, office, and commercial uses to contribute to the community's well-being by providing jobs and local places to buy goods and services, with an emphasis on revitalizing commercial districts. The Economic Prosperity Element also includes policies which address economic development.
- **Recreation:** This element aims to enhance the recreational value of parks and public spaces by expanding and reimagining them to maximize their value to the community. It seeks to identify new park and public space opportunities on City-owned land and encourages partnerships and joint-use agreements with other public entities and private landowners to create opportunities for public spaces and recreation on non-City properties. The CPU identifies potential new parks and recreation facilities including the 62nd Street Mini Park, Alvarado Creek Neighborhood Park, Brockbank Place Overlook Pocket Park, Saranac Alley

Pocket Park, Adams-Baja Trail and Trailhead Pocket Park, Pocket Park at 54th Street, and Montezuma Road Public Space. Opportunities for a potential overlook along College Avenue and a new recreation center along or within proximity to College Avenue are identified in the CPU, however a site-specific location for each facility has not been identified. Figure 9, *Parks*, shows existing and proposed parks and recreation facilities within the CPU area. The development of new and/or improvements to existing parks and recreation facilities could occur as part of future public projects or private development and could require new and/or amended General Development Plans, dedication of public park space, acquisition of land, reuse of City-owned land, and other related actions (see, also, the Community Enhancement Overlay Zone section, below). Similarly, future opportunities for recreation centers and aquatic complexes will be evaluated as current leases on City-owned land expire, and as sites and funding become available. Potential parks and recreation facilities improvements which could occur include, but are not limited to, the installation of multi-use pathways, play areas, interpretive and educational elements, wayfinding and signage, landscaping, restrooms, lighting, public art, seating, hard courts, and other amenities. The Recreation Element also includes policies which address park development, access and activation, and trails and open space interface.

- **Open Space & Conservation:** This element addresses the protection and enhancement of open space and sensitive species and habitats within the College Area CPU area. It provides policies and land use guidance that address natural resource conservation, reduction in the use of non-renewable resources, and climate resiliency. It encourages the protection and enhancement of the community urban forest; provision of storm water infiltration through rooftop gardens or green roofs, green spaces, permeable pavement, and other low impact development techniques; use of green building practices such as the inclusion of on-site renewable power generation, where feasible, and the development of energy and water-efficient buildings; and the creation of community gardens. The Open Space & Conservation Element includes policies which address sustainable development, natural resource conservation, and community gardens. Figure 10, *Vegetation Communities and Land Cover Types*, illustrates the existing vegetation communities within the CPU area, and Figure 11, *Open Spaces and Multi-Habitat Planning Area*, depicts conserved land within the CPU area.
- **Public Facilities, Services & Safety:** This element addresses public services and facilities including police, fire-rescue, schools, libraries, hospitals, SDSU, and public utilities. It also addresses health and safety issues within the College Area CPU area, including air quality, hazardous materials, extreme temperatures, geologic and seismic hazards, fire, and flooding. Figure 12, *Public Facilities*, shows existing public facilities. Figure 13, *Very High Fire Hazard Severity Zones*, shows existing areas within the CPU area that are in proximity to fire hazard zones. To address future and current community needs, this element provides policies concerning improvements to existing public services and facilities and, when possible, provides proposed locations and design for new public facilities. The CPU identifies a potential new fire station near SDSU, and a second potential new fire station near El Cajon Boulevard and 70th Street. The Public Facilities, Services & Safety Element includes policies which address public schools; libraries; healthcare; police; fire-rescue; flooding/stormwater; seismic safety; lighting, landscaping, and maintenance; and extreme heat.

- **Historic Preservation:** This element provides a summary of the prehistory and history of the community and establishes policies to support the identification and preservation of its historical, archaeological, and tribal cultural resources. The intent of this element is to improve the quality of the built environment, encourage appreciation for the City's history and culture, enhance community identity, and contribute to the City's economic vitality through historic preservation. Figure 14, *Cultural Sensitivity*, depicts the cultural resource sensitivity levels within the College Area CPU area. The Historic Preservation Element includes policies which address archaeological and tribal resources, historic resources, and education and interpretation.
- **Implementation:** This element provides an overview of the connection between the CPU and the City of San Diego Municipal Code (SDMC), including requirements for new development to provide new public spaces and an enhanced and expanded pedestrian environment. Figure 15, *Community Enhancement Overlay Zone Area & Greenways*, depicts areas where supplemental design regulations would be applied pursuant to SDMC Chapter 13, Article 2, Division 16.
- **Appendix:** Although not an element, this section includes a street tree plan, parks and recreation inventory, and major streets and streetscape concepts which will be referenced to implement the urban design vision of the CPU.

Community Enhancement Overlay Zone

The College Area CPU proposes a Community Enhancement Overlay Zone (CEOZ) which would be applied within the boundaries of the CPU area per SDMC Chapter 13, Article 2, Division 16, as shown on Figure 15, *Community Enhancement Overlay Zone Area & Greenways*. SDMC Section 132.1601 et seq. includes supplemental development regulations which address the provision of community enhancements including additional pedestrian access, public spaces, and multimodal connectivity improvements, as well as other College Area CPU-specific design regulations. These supplemental development regulations will be applied to specific areas within the CPU area barring an exception is granted under SDMC Section 132.1605. These regulations supplement the underlying base zone development regulations to ensure consistency with the College Area CPU's vision and plan policies and streamline the development review process. Within these areas, future development that is consistent with the CPU, the base zone regulations, and the applicable development regulations in SDMC Section 132.1601 et seq. can be processed ministerially in accordance with the procedures of the CEOZ. Future development that does not comply with the CPU, the base zone regulations, or the applicable development regulations in SDMC Section 132.1601 et seq. shall be required to obtain a Site Development Permit or a Neighborhood Development Permit, as applicable. SDMC Section 132.1610 also provides guidance when the CEOZ supplemental development regulations conflict with other development regulations.

New development within the College Area CPU's CEOZ areas shall be required to comply with SDMC Section 132.1615, which requires the provision of new public spaces such as plazas, urban greens, podiums, greenways, and paseos on site for development that meets specific criteria and provides development regulations for these public spaces and associated amenities. SDMC Section 132.1615(a) also clarifies when a development is required to provide public spaces on site. New

development fronting both sides of Montezuma Road between College Avenue and El Cajon Boulevard shall be required to develop parkways, as defined in SDMC Section 113.0103, pursuant to SDMC Section 132.1625. Additionally, new development in the following areas shall be required to develop greenways, as defined in SDMC Section 113.0103, in accordance with SDMC Section 132.1620 (see Figure 15, *Community Enhancement Overlay Zone Area & Greenways*):

- North side of El Cajon Boulevard between 54th Street and Keeny Street;
- Both sides of College Avenue between El Cajon Boulevard and Cantina Way; and
- Both sides of Montezuma Road between 55th Street and El Cajon Boulevard.

Amendment to the Mid-City Communities Plan for the College Area CPU Area Boundary Line Revision

The College Area CPU includes an amendment to the Mid-City Communities Plan to revise the boundary between the College Area CPU area and the Kensington-Talmadge Community Plan area. The proposed western boundary of the College Area CPU area will be comprised of the centerline of Fairmount Avenue, the centerline of Montezuma Road to the parcel line of the property on the southwest corner of Montezuma Road and Collwood Boulevard, the western parcel lines along Collwood Boulevard up to Monroe Avenue, the centerline of Monroe Avenue and the centerline of Collwood Boulevard south of Monroe Avenue (Figure 3, *Aerial Photograph*). The proposed amendment will add open space lands to the Kensington-Talmadge Community Plan area.

Discretionary Actions

Adoption of the College Area CPU includes the following discretionary actions:

1. Adopt a resolution adopting the Addendum to the Blueprint SD PEIR for the College Area CPU;
2. Adopt a resolution adopting the College Area CPU and amending the General Plan land use map consistent with the College Area CPU;
3. Adopt a resolution rescinding the Core Sub-Area Design Manual which was adopted by the City of San Diego City Council Resolution R-289099;
4. Adopt a resolution amending the Mid-City Communities Plan to reflect the revised Kensington-Talmadge Community Plan area boundary and amending the General Plan land use map consistent with the Mid-City Communities Plan Amendment;
5. Adopt an ordinance rezoning land within the College Area CPU area consistent with the College Area CPU;
6. Adopt an ordinance amending the SDMC as follows:
 - a. Amend SDMC Section 113.0103 to add definitions to words and phrases that have meanings specifically related to the City's Land Development Code;
 - b. Amend SDMC Section 126.0402 to clarify when a Neighborhood Development Permit is required;
 - c. Amend SDMC Section 126.0502 to clarify when development within the CEOZ should be processed in accordance with SDMC Section 126.0503 and Section 132.1602, Table 132-16B;
 - d. Amend SDMC Section 132.0102, Table 132-01A to include a reference to the CEOZ as an overlay zone designation;

- e. Amend SDMC Section 132.1402, Table 132-14A to remove references to the Community Plan Implementation Overlay Zone (CPIOZ) for the College Area Community Plan and to remove Diagram 132-14Q;
 - f. Adopt Chapter 13, Article, 2, Division 16 to provide supplemental development regulations for specific sites within the CEOZ areas of the City including within the College Area CPU area;
 - g. Amend SDMC Section 141.0621 to reference specific definitions in the City's Land Development Code;
 - h. Amend SDMC Section 143.0302, Table 143-03A to specify when a development in a CEOZ may be permitted with a Site Development Permit decided in accordance with Process Three;
 - i. Amend SDMC Section 143.0920 to add subsection (f) which specifies when an affordable housing, in-fill project, and/or a sustainable building development in a CEOZ may be permitted with a Neighborhood Development Permit decided in accordance with Process Two;
 - j. Amend SDMC Section 143.1025(a)(1)(C)(i) to include a reference to the CEOZ regulations;
 - k. Amend SDMC Section 143.1410 to reference specific definitions in the City's Land Development Code; and
7. California Coastal Commission certification of the amendments to the SDMC.

Future Actions

Future development within the CPU area would involve subsequent approval of site-specific public and private development projects through both ministerial and discretionary reviews in accordance with all applicable local, state, and federal regulations, plans, and policies. These subsequent activities may be public (i.e., road/streetscape improvements, parks, public facilities and utilities, etc.) or private projects, and are referred to as future development or future projects in the text of this Addendum. Future site-specific discretionary development would be subject to further environmental review to determine if actions are within the scope of the environmental analysis within the Blueprint SD PEIR and this Addendum. Future actions that would tier off the Blueprint SD PEIR and this Addendum would require compliance with applicable local, state, and federal policies, guidelines, directives, and regulations, and implementation of the mitigation framework contained in this Addendum, as applicable, at the time the development is proposed. A non-exhaustive list of potential future actions and/or approvals that could occur as the proposed project is implemented is shown in Table 1, *Potential Future Actions/Approvals to Implement the Project*.

Table 1
POTENTIAL FUTURE ACTIONS/APPROVALS TO IMPLEMENT THE PROJECT

Agency	Action/Approval
City of San Diego	Subdivision maps
	Discretionary and ministerial permits (e.g., Site Development Permits, Conditional Use Permits, Neighborhood Development Permits, Planned Development Permits, Neighborhood Use Permits, Building Permits, Construction Permits)
	Water, sewer, and stormwater infrastructure and roadway, bicycle, and sidewalk improvements (public right-of-way permits)
	Street and other Easement Vacations, Release of Irrevocable Offers of Dedication, and Dedications
	Adoption of fees to implement neighborhood supportive infrastructure
	Amendments to the SDMC, including the Land Development Code
	Approval of additional density through City and State density bonus allowances
	Approval of new or amendments to existing General Development Plans for parks and recreation facilities
	Amendments to existing or approval of new Joint Use Agreements with the San Diego Unified School District for Joint Use Facilities
	Approval of MHPA Boundary Line Corrections and Boundary Line Adjustments.
State of California	Real estate actions (e.g. Disposition and Development Agreements, Lease Agreements, License Agreements, Right of Entry Permits, etc.)
	Caltrans Encroachment Permits
	Water Quality Certification Determinations for Compliance with Section 401
	California Department of Fish and Wildlife Streambed Alteration Agreements
Federal	Water Quality Certifications for Compliance with Clean Water Act Section 401
	U.S. Army Corps of Engineers Section 404 permits
Other	U.S. Fish and Wildlife Service Section 7 or 10(a) permits
	San Diego Gas & Electric/Public Utilities Commission approvals of power line relocations or undergrounding

III. ENVIRONMENTAL SETTING

The College Area CPU area encompasses approximately 1,924 acres and is located in the central portion of the City within San Diego County (County) (Figure 1, *Regional Location*). The College Area CPU area is located on the United States Geological Survey, 7.5-minute series La Mesa Quadrangle Map (Figure 2, *USGS Topography*). The topography of the CPU area varies and is characterized by mesas and relatively level land where development occurs interspersed with finger canyons and slopes that comprise open space areas. The College Area CPU area is bounded by Interstate (I-) 8 to the north, El Cajon Boulevard to the south and southeast, and the City of La Mesa to the east. The western boundary is formed along the centerline of Fairmount Avenue, the centerline of Montezuma Road to the parcel line of the property on the southwest corner of Montezuma Road and Collwood Boulevard, the western parcel lines along Collwood Boulevard up to Monroe Avenue, the centerline of Monroe Avenue and the centerline of Collwood Boulevard south of Monroe Avenue (Figure 3, *Aerial Photograph*). Surrounding communities include the Mission Valley Community Plan area to the northwest; the Navajo Community Plan area to the north; the City of La Mesa to the east and southeast; the Eastern Area Community Plan area to the south; and the Kensington-Talmadge Community Plan area to the west. SDSU is in the center of the College Area community. The MTS

Green Line trolley corridor traverses in a generally west-east alignment along the northern community plan area boundary. The College Area community is served by two trolley stations along the MTS Green Line that provide transit connections to the region.

The College Area CPU area is mostly developed and includes a mix of land uses, including but not limited to SDSU and affiliated development, residential development of various densities, commercial businesses, parks and open space, institutional uses, and various transportation structures (e.g., arterial roadways and public transportation facilities). Most of the community developed after SDSU relocated from Normal Street in University Heights to its current location in 1931. El Cajon Boulevard, formerly designated as part of US Route 80, is the historic east - west commercial gateway between Imperial County and Downtown San Diego. In 1951, the US Route 80 moved to a new freeway which became I-8. College Avenue is the community's primary north to south gateway connecting El Cajon Boulevard to SDSU and I-8. Other major transportation corridors in the CPU area include Montezuma Road, Collwood Boulevard, and 70th Street. Canyons and slopes that comprise open space and MHPA preserve lands occur in between and within developed neighborhoods and adjacent to SDSU.

IV. ENVIRONMENTAL DETERMINATION

The City previously prepared and certified the Final PEIR for the Blueprint SD Initiative, Hillcrest FPA, and University CPU (SCH No. 2021070359) per Resolution No. R-315701 on July 23, 2024. Based on available information in light of the entire record, the analysis in this Addendum, and pursuant to CEQA Guidelines Sections 15162, 15164, and 15168, the City has determined the following:

- 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, which 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 document 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 proposed project, none of the situations described in CEQA Guidelines Section 15162 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 to the Blueprint SD PEIR has been prepared in accordance with CEQA Guidelines Section 15164. Further, use of the Addendum for the project complies with CEQA Guidelines Section 15168(c). Appropriate mitigation measures from the Blueprint SD PEIR have been incorporated, as applicable. See Section VII, *Mitigation Monitoring and Reporting Program* in this Addendum. Public review of this Addendum is not required per CEQA.

V. IMPACT ANALYSIS

The analysis in this document evaluates the adequacy of the Blueprint SD PEIR relative to the project, whether the project would have effects that were not examined in the Blueprint SD PEIR, whether the project is within the scope of the environmental analysis in the Blueprint SD PEIR, and whether a subsequent environmental document is required under CEQA Guidelines Section 15162. This Addendum includes the environmental issues analyzed in detail in the previously certified Blueprint SD PEIR, as well as the subsequent project-specific environmental analysis pursuant to CEQA.

The Blueprint SD PEIR identified significant impacts relative to Aesthetics, Air Quality, Biological Resources, Cultural Resources, Hydrology, Noise, Public Services, Recreation, Transportation, Tribal Cultural Resources, Utilities and Service Systems, and Wildfire. In some cases, mitigation measures were deemed infeasible, and the mitigation measures that were identified failed to bring impacts to below a level of significance. The Blueprint SD PEIR concluded that all identified significant impacts would remain unmitigated. Impacts relative to Energy, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Land Use and Planning, and Water Quality were identified in the Blueprint SD PEIR as less than significant.

The College Area CPU is specifically identified in the Blueprint SD PEIR as a future planning document anticipated to be evaluated for consistency with the Blueprint SD PEIR. This Addendum includes the subsequent impact analysis prescribed in the Blueprint SD PEIR for the College Area CPU to determine if environmental impacts associated with the proposed project are consistent with, or are not greater than, the impacts disclosed in the previously certified Blueprint SD PEIR. The impact analysis addresses the environmental issues analyzed in detail in the previously certified Blueprint SD PEIR.

The following impact analysis concludes there would be no new significant impacts, nor would there be an increase in the severity of impacts resulting from the proposed 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 Blueprint SD PEIR. A comparison of the project's impacts related to those of the certified Blueprint SD PEIR is provided below in Table 2, *Impact Assessment Summary*.

Table 2
IMPACT ASSESSMENT SUMMARY

Environmental Issue	Blueprint SD PEIR	Blueprint SD PEIR Mitigation	Proposed College Area CPU	Applicable Blueprint SD PEIR Mitigation	Project-Level New Mitigation	College Area CPU Resultant Impacts
Aesthetics	SU	--	No new impacts	--	--	SU
Air Quality	SU	MM-AQ-1 MM-AQ-2 MM-AQ-3	No new impacts	MM-AQ-1 MM-AQ-2 MM-AQ-3	--	SU
Biological Resources	SU	MM-BIO-1	No new impacts	MM-BIO-1	--	SU
Cultural Resources	SU	MM-HIST-1 MM-HIST-2	No new impacts	MM-HIST-1 MM-HIST-2	--	SU
Energy	LTS	--	No new impacts	--	--	LTS
Geology and Soils	LTS	--	No new impacts	--	--	LTS
Greenhouse Gases	LTS	--	No new impacts	--	--	LTS
Hazards and Hazardous Materials	LTS	--	No new impacts	--	--	LTS
Hydrology	SU	--	No new impacts	--	--	SU
Land Use and Planning	LTS	--	No new impacts	--	--	LTS
Noise	SU	MM-NOI-1 MM-NOI-2	No new impacts	MM-NOI-1 MM-NOI-2	--	SU
Public Services	SU	--	No new impacts	--	--	SU
Recreation	SU	--	No new impacts	--	--	SU
Transportation	SU	MM-TRANS-1 MM-TRANS-2	No new impacts	MM-TRANS-1	--	SU
Tribal Cultural Resources	SU	MM-HIST-2	No new impacts	MM-HIST-2	--	SU
Utilities and Service Systems	SU	--	No new impacts	--	--	SU
Water Quality	LTS	--	No new impacts	--	--	LTS
Wildfire	SU	MM-FIRE-1 MM-FIRE-2	No new impacts	MM-FIRE-1 MM-FIRE-2	--	SU

SU = significant and unavoidable; LTS = less than significant

V.1 Aesthetics

V.1.1 Scenic Vistas

Blueprint SD PEIR

Aesthetics impacts related to scenic vistas are evaluated in Section 4.1.4 (Issue 1) of the Blueprint SD PEIR.

The Blueprint SD PEIR concluded that implementation of the Blueprint SD Initiative, Hillcrest FPA, and University CPU would result in areas of increased density, intensity, and building heights which could adversely affect scenic vistas from public viewing locations. The design of future development, including building mass, heights, and intensity would be subject to the existing regulatory framework including, but not limited to, the City's base zone regulations and applicable Supplemental Development Regulations (SDRs) at the time the development is proposed, which would reduce potential impacts to scenic vistas. Additionally, the Blueprint SD Initiative, Hillcrest FPA, and University CPU provide a range of policies that address the relationship between development and scenic views. Future projects that require discretionary review would undergo a project-specific environmental review at the appropriate future time which would evaluate the project's consistency with applicable General Plan and Community Plan policies and adherence to these policies would further minimize potential impacts to scenic vistas. The Blueprint SD PEIR concluded, however, at the program level of review, and without project-specific development plans and the potential for deviations to be allowed, direct and cumulative impacts associated with scenic vistas and viewsheds would be significant.

The Blueprint SD PEIR concluded that potential impacts would generally be addressed through compliance with the existing regulatory framework including the urban design policies of the applicable Community Plan, Specific Plan or FPA, City base zone regulations, and any applicable SDRs. However, at the program level of review without site-specific plans available for evaluation and the potential for deviations to be allowed, the Blueprint SD PEIR concluded it is not possible to ensure all future impacts could be fully mitigated to less than significant. No feasible mitigation measures were identified in the Blueprint SD PEIR to address significant impacts to scenic vistas. The Blueprint SD PEIR noted that site-specific design features and/or mitigation measures may be identified at the project-level to reduce potential aesthetic impacts to the extent feasible, but concluded that direct and cumulative aesthetics impacts related to scenic vistas would be significant and unavoidable.

College Area CPU

No designated scenic vistas are identified in the College Area CPU. The CPU area is mostly characterized by urban development but includes open space areas comprised of isolated urban canyons and hillsides that provide visual amenities within the community. These areas primarily occur in the northwest portion of the CPU area along with other pockets in the northeast and central portions of the CPU area generally in between residential neighborhoods. Implementation of the College Area CPU would result in areas of increased density, intensity, and building heights which would be focused along transit corridors of the College Area community, particularly along El Cajon

Boulevard, Montezuma Road, and around SDSU, which could adversely affect views of the open space areas from public viewing locations.

The College Area CPU does not propose any development within its open space areas. Future development would be concentrated predominantly within existing developed areas and along major transit corridors. A potential future overlook park along Brockbank Place is identified in the CPU which would provide views to the adjacent canyon with passive recreational opportunities. A trail between Baja Drive and Adams Avenue is also proposed on non-MHPA lands which would provide scenic views of the canyons. The CPU also identifies a potential overlook along College Avenue which would provide views of the canyons; however, a site-specific location has not been identified.

Individual future development proposed under the College Area CPU would be required to comply with regulatory requirements such as the City's base zone regulations, Environmentally Sensitive Lands (ESL) Regulations, and other City regulations and, if the development occurs within the College Area's CEOZ areas, any applicable regulations under SDMC Section 132.1601 et. seq at the time the development is proposed. The College Area CPU also includes policies that encourage future development to consider scenic views within the community in their project design. These policies include, but are not limited to, Policy 4.44 which calls for stepping development down with canyon and hillside landforms to maximize view opportunities and allow for decks and patios, Policy 4.48 which calls for providing setbacks between buildings as they step with the slope to offer visual relief and create the appearance of development that is integrated into the landscape, and Policy 4.49 which calls for locating structures within the least visually prominent portion of a lot and/or away from the edge of designated open space, when all or a portion of a property is within privately owned, designated open space. Adherence to the existing regulatory and policy framework would dictate a development's ultimate height, mass, form, and intensity through the allowable FAR and setback standards, as applicable, and would reduce potential impacts to scenic vistas. Additionally, future projects that require discretionary review would undergo a project-specific environmental review to evaluate the project's consistency with applicable General Plan and College Area CPU policies and could identify additional project features and/or mitigation measures to address potential impacts to scenic vistas.

PRC Section 21099(d)(1) states that aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a TPA shall not be considered significant impacts on the environment. Implementation of the project could result in the development of residential and mixed-use residential projects on infill sites within TPAs because the project would increase opportunities for homes and jobs within existing developed areas that are in proximity to transit. Therefore, pursuant to PRC Section 21099(d)(1), potential aesthetic impacts could be considered less than significant. However, not all development that would occur in accordance with the project would be within a TPA and/or would meet the criteria in PRC Section 21099(d)(1).

As previously stated, adherence to the existing regulatory and policy framework would help reduce potential environmental impacts related to scenic vistas. However, due to the potential for deviations from the SDMC to be allowed, such as through a Planned Development Permit or allowances for waivers and/or incentives associated with affordable housing, it cannot be ensured that all applicable City land development and design regulations would apply. While it is unlikely that future development would result in a substantial adverse effect on a scenic vista, it cannot be known

at this program-level of review without site-specific plans and potential deviations. At this program level of review, impacts associated with scenic vistas would be considered significant.

As with the Blueprint SD PEIR, there are no feasible mitigation measures identified at this program level that would reduce significant impacts to scenic vistas. Future development projects could include incorporation of project features and/or implementation of project-specific mitigation measures to reduce potential aesthetics impacts but associated impacts resulting from the proposed project would be significant and unavoidable. Therefore, the proposed project is consistent with the impact conclusions identified in the Blueprint SD PEIR for scenic vistas, and would not result in new significant impacts or a substantial increase in the severity of previously identified impacts.

V.1.2 Scenic Highways

Blueprint SD PEIR

Aesthetics impacts related to scenic highways are evaluated in Section 4.1.4 (Issue 2) of the Blueprint SD PEIR.

The Blueprint SD PEIR determined that development associated with the Blueprint SD Initiative, Hillcrest FPA, and University CPU is not anticipated to substantially damage scenic resources, including trees, rock outcroppings, and historic buildings within a state scenic highway. However, future development could impact scenic views or vistas from a designated or eligible scenic highway in the City.

The Blueprint SD PEIR noted that future development would not be visible from currently designated state scenic highways, including the designated scenic portion of State Route (SR-) 163 due to topography, and the majority of the designated portion of SR-52 is within the Mission Trails Open Space area. The Blueprint SD Initiative's policy and land use framework would apply citywide and future development and associated impacts that follow this framework could occur citywide. Nevertheless, it is anticipated that future increases in development densities and intensities would likely be focused within the Climate Smart Village Areas and therefore, impacts associated with future development are more likely to be concentrated in these areas. The Village Climate Goal Propensity Map does not identify potential Climate Smart Village Areas in proximity to the designated scenic portion of SR-52. However, as noted in the Blueprint SD PEIR, the boundaries of future Climate Smart Village Areas could shift as the regional transportation network is updated, and future development could occur within the scenic viewshed of this scenic route. Similarly, future development that follows the Blueprint SD Initiative's policy and land use framework and is located outside of a Climate Smart Village Area could potentially impact a scenic viewshed on this scenic route. Currently eligible scenic routes could also be designated in the future and development per the Blueprint SD Initiative could be within the potential scenic viewshed of these scenic routes.

The Blueprint SD PEIR noted that projects that require discretionary review would undergo a project-specific environmental review at the appropriate future time which would evaluate the project's consistency with applicable General Plan and Community Plan policies related to scenic highways and could identify additional project features and/or mitigation measures to address potential impacts. Additionally, the Blueprint SD PEIR determined that compliance with the regulations in

existence at the time the development is proposed including the City's base zone regulations, ESL Regulations, and other City regulations would help reduce potential environmental impacts. However, due to the potential for deviations from the SDMC to be allowed, the Blueprint SD PEIR determined it cannot be ensured that all applicable City land development and design regulations would apply. Therefore, the Blueprint SD PEIR concluded that at the program level of analysis without site-specific plans and potential deviations, direct and cumulative impacts to scenic views or vistas from a state-designated highway would be significant.

The Blueprint SD PEIR concluded that potential impacts would generally be addressed through compliance with the existing regulatory framework including the City's base zone regulations and any applicable SDRs. Additionally, future development would be reviewed for consistency with the urban design policies of the applicable Community Plan, Specific Plan, or FPA. However, at the program level of review without site-specific plans available for evaluation and the potential for deviations to be allowed, the Blueprint SD PEIR concluded it is not possible to ensure all future impacts could be fully mitigated to less than significant. No feasible mitigation measures were identified in the Blueprint SD PEIR to address significant impacts to scenic highways. The Blueprint SD PEIR noted that site-specific design features and/or mitigation measures may be identified at the project-level to reduce potential aesthetic impacts to the extent feasible, but concluded that direct and cumulative aesthetics impacts related to scenic highways would be significant and unavoidable.

College Area CPU

Future development under the College Area CPU is not anticipated to substantially damage scenic resources, including trees, rock outcroppings, and historic buildings within a state scenic highway. The nearest designated state scenic highways to the College Area CPU area include the portion of SR-163 through Balboa Park, approximately four miles to southwest, and the portion of SR-125 between SR-94 and I-8, approximately two miles to the east (California Department of Transportation [Caltrans] 2018). However, future development under the College Area CPU would not be visible from either of these designated scenic highways due to intervening development and distance. The nearest eligible scenic highway is I-8, which bounds the College Area CPU area to the north and could be designated in the future (Caltrans 2018). Should this route be officially designated in the future, future development implemented under the College Area CPU could impact scenic resources that are visible from the highway.

PRC Section 21099(d)(1) states that aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a TPA shall not be considered significant impacts on the environment. Implementation of the project could result in the development of residential and mixed-use residential projects on infill sites within TPAs because the project would increase opportunities for homes and jobs within existing developed areas that are in proximity to transit. Therefore, pursuant to PRC Section 21099(d)(1), potential aesthetic impacts could be considered less than significant. However, not all development that would occur in accordance with the project would be within a TPA and/or would meet the criteria in PRC Section 21099(d)(1).

Individual projects under the College Area CPU that require discretionary review would undergo a project-specific environmental review to evaluate the project's consistency with applicable General Plan and CPU policies and could identify project features and/or mitigation measures to address

potential impacts to scenic highways. Additionally, compliance with the City's base zone regulations, ESL Regulations, and other City regulations would dictate a development's ultimate height, mass, form, and intensity through the allowable FAR and setback standards, as applicable, which would help reduce potential environmental impacts to scenic views or vistas from a state-designated scenic highway. However, the proposed College Area CPU does not identify project-specific development plans. As such, at this program level of review without site-specific plans available for evaluation and the potential for deviations to be allowed, impacts associated with scenic highways would be significant.

As with the Blueprint SD PEIR, there are no feasible mitigation measures identified at this program level that would reduce significant impacts to scenic highways. Future development projects could incorporate project features and/or implement project-specific mitigation measures to reduce potential aesthetics impacts but associated impacts resulting from the proposed project would be significant and unavoidable. Therefore, the proposed project is consistent with the impact conclusions identified in the Blueprint SD PEIR for scenic highways, and would not result in new significant impacts or a substantial increase in the severity of previously identified impacts.

V.1.3 Visual Character, Quality of Public Views, and Scenic Quality

Blueprint SD PEIR

Aesthetics impacts related to visual character, quality of public views, and scenic quality are evaluated in Section 4.1.4 (Issues 3 and 4) of the Blueprint SD PEIR.

The Blueprint SD PEIR concluded that compliance with the City's regulations, development standards, urban design policies, and any SDRs proposed as part of the Blueprint SD Initiative and as part of future CPUs, Specific Plans, and FPAs would ensure that development under Blueprint SD would not substantially alter the existing visual character, quality of public views, or scenic quality of the Blueprint SD Initiative's project area. Future projects that require discretionary review would undergo a project-specific environmental review at the appropriate future time which would evaluate a project's consistency with the applicable urban design policies of the applicable Community Plan, Specific Plan, or FPA and could identify additional project features and/or mitigation measures to address potential impacts. The Blueprint SD PEIR concluded however that at the program level of review, and without project-specific development plans and details regarding potential deviations, it is not possible to ensure all future impacts could be fully mitigated to less than significant and direct and cumulative impacts associated with visual character, quality of public views, and scenic quality would be significant.

No feasible mitigation measures were identified in the Blueprint SD PEIR to address significant impacts to visual character, quality of public views, and scenic quality. The Blueprint SD PEIR noted that site-specific design features and/or mitigation measures may be identified at the project-level to reduce potential aesthetic impacts to the extent feasible, but concluded that direct and cumulative aesthetics impacts related to visual character, quality of public views, and scenic quality would be significant and unavoidable.

College Area CPU

Future development under the College Area CPU is anticipated to be focused within existing developed areas that have existing infrastructure, public services and facilities, and amenities, and are in proximity to transit. These new developments could vary in building height, mass, form, architectural style, and intensity which could alter the existing visual character, including the bulk, scale and visual appearance of these areas via increased residential densities and intensities, multi-modal transportation facility improvements, and new and improved public spaces.

The College Area CPU provides urban design policies within the Urban Design Element that would apply to future projects within the CPU area, such as Policy 4.1 which calls for establishing a pattern of building massing and form to help reduce the visual bulk; Policy 4.2 which encourages the use of a combination of building setbacks and upper-story step-backs, to provide transitions between areas with higher densities to lower density areas; Policy 4.6 which encourages the provision of a unified and consistent use of building materials, textures, and colors; Policy 4.9 which calls for designing building features that help to activate the pedestrian environment along streets and public spaces; and Policy 4.11 which encourages residential developments with ground floor residential uses along street frontages to promote a welcoming, pedestrian-friendly environment through features such as landscaped setbacks, porches, stoops, or other transitional elements.

Future development within the College Area CPU would also be required to comply with existing regulations which govern visual character and scenic quality. This regulatory framework includes, but is not limited to, the City's ESL Regulations, which provide requirements for development on steep hillsides, and the City's base zone regulations. Additionally, future development within the College Area CPU's CEOZ areas and greenways as depicted in Figure 15, *Community Enhancement Overlay Zone Area & Greenways*, would be required to comply with the development regulations in SDMC Section 132.1601 et seq., as applicable, which provides specific design requirements related to the provision of public spaces, greenways, and parkways. Mass grading is not anticipated since the CPU area is relatively flat and already nearly fully developed with urban uses. Nevertheless, future development could occur in areas with steep slopes and would be required to comply with the provisions of the City's MSCP SAP, ESL Regulations, and grading and landscape regulations. Compliance with these regulations would ensure future development would not substantially degrade the existing visual character, quality of public views, or scenic quality. Adherence to the regulatory and policy framework in the College Area CPU would provide for cohesive design themes, visual elements, and development patterns on a communitywide basis as the CPU area is built out. Nevertheless, future development is anticipated to result in areas of increased density and intensity which could result in development which impacts the existing visual character, quality of public views, and scenic quality.

PRC Section 21099(d)(1) states that aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a TPA shall not be considered significant impacts on the environment. Implementation of the project could result in the development of residential and mixed-use residential projects on infill sites within TPAs because the project would increase opportunities for homes and jobs within existing developed areas that are in proximity to transit. Therefore, pursuant to PRC Section 21099(d)(1), potential aesthetic impacts could be considered less than significant. However, not all development that would occur in

accordance with the project would be within a TPA and/or would meet the criteria in PRC Section 21099(d)(1).

Projects that require discretionary review would undergo a project-specific environmental review at the appropriate future time to evaluate the project's consistency with applicable General Plan and CPU policies and could identify additional project features and/or mitigation measures to address potential impacts to the existing visual character, public views, and scenic quality. Additionally, as described above, compliance with the regulations in existence at the time the development is proposed, including the City's base zone regulations, ESL Regulations, and other City regulations would dictate a development's ultimate height, mass, form, and intensity through the allowable FAR and setback standards, as applicable, which would help reduce potential environmental impacts related to existing visual character, public views, and scenic quality. However, due to the potential for deviations from the SDMC to be allowed, such as through a Planned Development Permit or allowances for waivers and/or incentives associated with affordable housing, it cannot be ensured that all applicable City land development and design regulations would apply. Therefore, at this program level of review without site-specific plans and potential deviations, impacts would be considered significant.

As with the Blueprint SD PEIR, there are no feasible mitigation measures identified at this program level that would reduce significant impacts to visual character, quality of public views, and scenic quality. Future development projects could include incorporation of project features and/or implementation of project-specific mitigation measures to reduce potential aesthetics impacts but associated impacts resulting from the proposed project would be significant and unavoidable. Therefore, the proposed project is consistent with the impact conclusions identified in the Blueprint SD PEIR for visual character, quality of public views, and scenic quality, and would not result in new significant impacts or a substantial increase in the severity of previously identified impacts.

V.1.4 Light, Glare, or Shade

Blueprint SD PEIR

Aesthetics impacts related to light, glare, or shade are evaluated in Section 4.1.4 (Issue 5) of the Blueprint SD PEIR.

The Blueprint SD PEIR concluded that future development would be required to comply with the SDMC including SDMC Sections 142.0740 et seq., 142.0730, and 142.0730(b) which address light and glare in new development. Therefore, direct and cumulative impacts relative to light and glare would be less than significant.

The Blueprint SD PEIR concluded that future development is anticipated to result in areas of increased density, intensity, and building heights which could create new sources of shade in the Blueprint SD Initiative, Hillcrest FPA, and University CPU areas. Projects that require discretionary review would undergo a project-specific environmental review at the appropriate future time which would evaluate the project's consistency with applicable General Plan and Community Plan policies related to shade and could identify additional project features and/or mitigation measures to address potential shade impacts. Additionally, compliance with the regulations in existence at the time the development is proposed including the City's base zone regulations, ESL Regulations, and

other City regulations would help reduce potential environmental impacts related to shade. However, at the program level of review without site-specific plans available for evaluation and to the potential for deviations from the SDMC to be allowed, the Blueprint SD PEIR determined it cannot be ensured that all applicable City land development and design regulations would apply and that all future impacts could be fully mitigated to less than significant. Therefore, the Blueprint SD PEIR concluded that at the program level of review without site-specific plans and potential deviations, direct and cumulative impacts associated with shade would be significant.

No feasible mitigation measures were identified in the Blueprint SD PEIR to address significant impacts related to shade. The Blueprint SD PEIR noted that site-specific design features and/or mitigation measures may be identified at the project-level to reduce potential aesthetic impacts to the extent feasible, but concluded that direct and cumulative aesthetics impacts related to shade would be significant and unavoidable.

College Area CPU

Future development under the College Area CPU would be required to comply with the applicable outdoor lighting regulations of the SDMC (Section 142.0740 et seq.), which requires development to minimize negative impacts from light pollution including light trespass, glare, and urban sky glow. New outdoor lighting fixtures would also be required to minimize light trespass in accordance with the California Green Building Standards Code, where applicable, or otherwise would be required to direct, shield, and control light to keep it from falling onto surrounding properties.

The College Area CPU provides urban design policies within the Urban Design Element that address glare, including Policy 4.7 which encourages the use of non-reflective windows and glassing. Future discretionary development within the College Area CPU would be reviewed for consistency with policies in the Urban Design Element. Future development associated with the College Area CPU would also be required to comply with SDMC Section 142.0730 to limit the amount of reflective material on the exterior of a building that has a light reflectivity factor greater than 30 percent to a maximum of 50 percent. Additionally, per SDMC Section 142.0730(b), reflective building materials are not permitted where it is determined that their use would contribute to potential traffic hazards, diminish the quality of riparian habitat, or reduce enjoyment of public open space. Therefore, through regulatory and policy compliance, the project would not create substantial light or glare that would adversely affect daytime or nighttime views in the area, and impacts would be less than significant. The proposed project is consistent with the impact conclusions identified in the Blueprint SD PEIR for light and glare effects and would not result in new significant impacts or a substantial increase in the severity of previously identified impacts.

Future development under the College Area CPU is anticipated to result in areas of increased density, intensity, and building heights which could create new sources of shade in the College Area CPU area. Projects that create shade affecting nearby land uses would not necessarily be considered to have a significant impact on the environment; however, some specific situations that may result in shade impacts include projects that would cast shadows that substantially impair the beneficial use of a public or quasi-public park, lawn, garden, or open space; or affect the viability of existing solar collectors in conflict with PRC Sections 25980-25986. Projects implemented under the College Area CPU that require discretionary review would undergo a project-specific environmental review

which could identify project features and/or mitigation measures to address potential shade impacts.

PRC Section 21099(d)(1) states that aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a TPA shall not be considered significant impacts on the environment. Implementation of the project could result in the development of residential and mixed-use residential projects on infill sites within TPAs because the project would increase opportunities for homes and jobs within existing developed areas that are in proximity to transit. Therefore, pursuant to PRC Section 21099(d)(1), potential aesthetic impacts could be considered less than significant. However, not all development that would occur in accordance with the project would be within a TPA and/or would meet the criteria in PRC Section 21099(d)(1).

Projects that require discretionary review would undergo a project-specific environmental review at the appropriate future time which would evaluate the project's consistency with applicable General Plan and CPU policies and could identify additional project features and/or mitigation measures to address potential shade impacts. For example, General Plan Policy UD-C.1 calls on future development to consider design factors such as building bulk and mass, existing points of ingress/egress, and the potential for shadow casting. Additionally, compliance with the regulations in existence at the time the development is proposed including the City's base zone regulations, ESL Regulations, and other City regulations would dictate a development's ultimate height, mass, form, and intensity through the allowable FAR and setback standards, as applicable, which would help reduce potential environmental impacts related to shade. However, due to the potential for deviations from the SDMC to be allowed, such as through a Planned Development Permit or allowances for waivers and/or incentives associated with affordable housing, it cannot be ensured that all applicable City land development and design regulations would apply. Therefore, at this program level of review without site-specific plans and potential deviations, impacts associated with shade would be considered significant.

As with the Blueprint SD PEIR, there are no feasible mitigation measures identified at this program level that would reduce significant shading impacts. Future development projects could include incorporation of project features and/or implementation of project-specific mitigation measures to reduce potential shade impacts but associated impacts resulting from the proposed project would be significant and unavoidable. Therefore, the proposed project is consistent with the impact conclusions identified in the Blueprint SD PEIR for shade effects, and would not result in new significant impacts or a substantial increase in the severity of previously identified impacts.

V.1.5 Conclusion

Based on the foregoing analysis and information, there is no evidence that the College Area CPU would require a major change to the Blueprint SD PEIR relative to aesthetics. The Blueprint SD PEIR concluded that aesthetics impacts related to scenic vistas; scenic highways; visual character, quality of public views, and scenic quality; and shade effects would be significant and that potential impacts would generally be addressed through compliance with the existing regulatory and policy framework including, but not limited to, urban design policies of the applicable Community Plan, Specific Plan, or FPA; City base zone regulations; City design regulations; and any applicable SDRs. However, the Blueprint SD PEIR concluded that it is not possible to ensure all future impacts could

be fully mitigated to less than significant at a program level and concluded that impacts would be significant and unavoidable. No mitigation was identified in the Blueprint SD PEIR. The proposed project would result in similar aesthetics impacts given the program level of review for the College Area CPU. As such, the project would result in significant and unavoidable aesthetics impacts related to scenic vistas; scenic highways; visual character, quality of public views, and scenic quality; and shade effects. The Blueprint SD PEIR concluded that impacts relative to light and glare would be less than significant. Likewise, the project would not create a new source of substantial light or glare based on regulatory and policy compliance for future development projects. The College Area CPU would not result in any new significant aesthetics impacts, nor would it result in a substantial increase in the severity of aesthetics impacts from those described in the Blueprint SD PEIR.

V.2 Air Quality

V.2.1 Conflicts with Air Quality Plans

Blueprint SD PEIR

Air quality impacts related to conflicts with air quality plans are evaluated in Section 4.2.4 (Issue 1) of the Blueprint SD PEIR.

The Blueprint SD PEIR concluded that implementation of the Blueprint SD Initiative would result in greater density and intensity of uses beyond the densities and intensities assessed in currently adopted plans; therefore, future emissions associated with buildout of the Blueprint SD Initiative areas would be greater than what is accounted for in the Regional Air Quality Standards (RAQs) and State Implementation Plan (SIP). Thus, emissions of ozone precursors (volatile organic compounds [VOCs] and nitrous oxide [NO_x]) would be greater than what is accounted for in the RAQs and SIP and direct and cumulative impacts would be significant.

The Blueprint SD PEIR does not identify mitigation for this significant impact as the City regularly provides updates to SANDAG about changes to the City's land use map that could affect housing and employment forecasts. The Blueprint SD PEIR notes that the City would provide revised land use maps and housing and employment forecasts to SANDAG for future plan amendments to ensure that revisions to the population and employment projections used by the San Diego County Air Pollution Control District (SDAPCD) in updating the RAQS and SIP accurately reflect anticipated growth due to the project. The Blueprint SD PEIR concluded that impacts related to conflicts with air quality plans would be significant and unavoidable.

College Area CPU

The College Area CPU area is located within the San Diego Air Basin (SDAB), which is currently classified as a federal non-attainment area for ozone, and a state non-attainment area for particulate matter less than 10 microns (PM₁₀), particulate matter less than 2.5 microns (PM_{2.5}), and ozone. The California Clean Air Act requires air basins that are designated non-attainment areas for criteria pollutants to prepare and implement plans to attain the standards by the earliest practicable date. The SIP and the RAQS, which were most recently updated in 2022, serve as the air quality plans for the SDAB.

The basis for the SIP and RAQS is the distribution of population in the region as projected by SANDAG. The SDAPCD refers to approved general plans to forecast, inventory, and allocate regional emissions from land use and development-related sources. These emissions budgets are used in statewide air quality attainment planning efforts. As such, projects that propose development at an intensity equal to or less than the population growth projections and land use intensity described in their local land use plans are consistent with the SIP and RAQS. Implementation of the College Area CPU, however, would result in more development than under the adopted College Area Community Plan. The College Area CPU area contains Climate Smart Village Areas which are areas with medium to high village propensity values (i.e., 7 through 14) as identified on the Village Climate Goal Propensity Map (Figure LU-1 of the General Plan Land Use and Community Planning Element) where future increases in development capacity are anticipated to be focused. Consistent with the Village Climate Goal Propensity Map, the College Area CPU land use plan focuses increased development intensities within these Climate Smart Village Areas and near SDSU and transit facilities and along transportation corridors. As a result, implementation of the College Area CPU would result in greater future air emissions compared to the emissions budget based on the adopted College Area Community Plan. Thus, emissions of ozone precursors, VOC and NO_x, would be greater than what is accounted for in the SIP and RAQS. Impacts would be significant.

As described in the Blueprint SD PEIR, after approval of the College Area CPU, the City will provide a revised land use map and housing and employment forecast for the College Area CPU area to SANDAG to ensure that revisions to the population and employment projections used by the SDAPCD in updating the RAQS and SIP accurately reflect anticipated growth due to the College Area CPU. Therefore, no mitigation for this significant impact is proposed at this time. Until the anticipated growth of the College Area CPU is included in the emission estimates of the RAQS and the SIP, impacts would be significant and unavoidable. Therefore, the proposed project is consistent with the impact conclusions identified in the Blueprint SD PEIR for conflicts with air quality plans, and would not result in new significant impacts or a substantial increase in the severity of previously identified impacts.

V.2.2 Air Quality Standards

Blueprint SD PEIR

Air quality impacts related to air quality standards are evaluated in Section 4.2.4 (Issue 2) of the Blueprint SD PEIR.

The Blueprint SD PEIR concluded that the Blueprint SD Initiative includes planning level actions that do not propose physical development. Adoption of the Blueprint SD Initiative, Hillcrest FPA, and University CPU, as well as future LDC amendments, CPUs, and plan amendments would not result in impacts related to air quality standards during construction or operation because they are not associated with any project-specific development projects. However, the Blueprint SD PEIR concluded that future development projects proposed consistent with these planning level actions would involve construction and operational emissions, which could exceed air quality standards. Therefore, the Blueprint SD PEIR concluded that at a program level of review, direct and cumulative impacts would be significant.

The Blueprint SD PEIR included mitigation measure MM-AQ-1 which reinforces required compliance with applicable regulations pertaining to air quality including, but not limited to, SDAPCD Rules 20 through 20.8, Rule 50, Rule 51, Rule 52, Rule 55, and Rule 67.1. MM-AQ-1 additionally requires construction and operation of individual discretionary development projects to not exceed the criteria pollutant significance thresholds detailed in the City's CEQA Significance Thresholds.

The Blueprint SD PEIR concluded that the ability of future development to reduce air quality impacts to less than significant after the implementation of MM-AQ-1 cannot be guaranteed at a program level of review because (1) future project-specific development plans are unknown, (2) future ministerial projects would not be subject to detailed air quality evaluations, (3) operational emissions associated with future development would be greater for all pollutants when compared to the adopted land uses and assumptions used to develop the SIP and RAQS, and (4) it cannot be known at a program level of review whether certain projects would be able to reduce emissions below the significance thresholds. Therefore, the Blueprint SD PEIR concluded that direct and cumulative air quality impacts related to air quality standards would be significant and unavoidable.

College Area CPU

The College Area CPU includes planning level actions and does not propose any physical development at this time. However, individual future development projects under the proposed CPU would involve construction and operational emissions, which could exceed air quality standards. Therefore, at a program level of review, impacts would be significant.

Future discretionary projects within the College Area CPU area would be required to implement Blueprint SD PEIR MM-AQ-1 which reinforces required compliance with applicable regulations pertaining to air quality and would require that construction and operation of individual discretionary development projects within the College Area CPU not exceed the criteria pollutant significance thresholds as detailed in the City's CEQA Significance Thresholds. See Section VII of this Addendum for additional details. Additionally, projects that require discretionary review would undergo a project-specific environmental review at the appropriate future time to evaluate the project's consistency with applicable General Plan and CPU policies and could identify additional project features and/or mitigation measures to address potential air quality impacts. Nevertheless, the ability of future development within the College Area CPU area to reduce air quality impacts to less than significant after the implementation of Blueprint SD PEIR MM-AQ-1 cannot be guaranteed at a program level of review due to the absence of project-specific details and it also cannot be known for certain whether future projects would be able to reduce emissions below the significance thresholds. Furthermore, ministerial projects would not be subject to a detailed air quality evaluation. Associated air quality impacts would be significant and unavoidable. Therefore, the proposed project is consistent with the impact conclusions identified in the Blueprint SD PEIR for air quality standards, and would not result in new significant impacts or a substantial increase in the severity of previously identified impacts.

V.2.3 Sensitive Receptors

Blueprint SD PEIR

Air quality impacts related to sensitive receptors are evaluated in Section 4.2.4 (Issue 3) of the Blueprint SD PEIR.

The Blueprint SD PEIR concluded that direct and cumulative impacts associated with the exposure of sensitive receptors to carbon monoxide hot spots and toxic air emissions resulting from construction would be less than significant. Future development of residential land uses consistent with the Blueprint SD Initiative would not be sources of stationary or mobile source toxic air contaminants (TACs); therefore, impacts related to these land uses would be less than significant. However, future development of light industrial land uses or commercial land uses that involve stationary source emissions could result in a significant impact to sensitive receptors. Additionally, future development within industrial designated areas of the City where land uses such as heavy industrial, warehousing, and distribution could affect sensitive receptors due to mobile source diesel emissions, would result in a direct significant impact to sensitive receptors due to mobile source TACs. However, because emissions of TACs are localized to a specific area, such impacts would not combine to result in a significant cumulative impact and thus, the Blueprint SD PEIR concluded that cumulative impacts would be less than significant.

The Blueprint SD PEIR included mitigation measure MM-AQ-2 which reinforces required compliance with the existing regulatory and permitting framework. Specifically, future projects that would involve stationary source emissions subject to SDAPCD permitting shall be required to obtain applicable SDAPCD permits and demonstrate consistency with the permit conditions and SDAPCD rules. MM-AQ-2 also requires future discretionary development that involves heavy industrial land uses such as warehousing and distribution or other land uses that would involve substantial sources of mobile source diesel emissions to prepare a health risk assessment (HRA). The Blueprint SD PEIR concluded that implementation of MM-AQ-2 would reduce significant impacts to sensitive receptors. However, the requirement for an HRA does not apply to ministerial projects and, at a program level of review, the specific details of individual projects and the feasibility of MM-AQ-2 to fully mitigate all potential impacts are not known. Therefore, the Blueprint SD PEIR concluded that direct air quality impacts related to sensitive receptors would be significant and unavoidable.

College Area CPU

The College Area CPU proposes residential, commercial and mixed-use, and civic and institutional land uses. The College Area CPU does not propose industrial land uses. Future development of residential land uses under the College Area CPU would not be sources of stationary or mobile source TACs, and impacts related to these land uses would be less than significant, consistent with the Blueprint SD PEIR. However, future development of commercial land uses that involve stationary source emissions could result in a significant impact to sensitive receptors.

The College Area CPU includes policies which address air quality, including Policy 4.39 which calls for prioritizing planting of street trees that add color and visual interest, provide shade, improve air quality, stormwater management, and result in other environmental benefits; Policy 8.2 which calls for designing public facilities with an expanded urban tree canopy to reduce the heat island effect, reduce stormwater runoff, and improve air quality; and Policy 8.42 which calls for supporting urban greening projects or programs, such as expanded urban tree canopy, green roofs, green streets, and increased access to green spaces that provide air quality and natural cooling benefits during heat events. Projects that require discretionary review would undergo a project-specific environmental review at the appropriate future time to evaluate the project's consistency with applicable General Plan and CPU policies and could identify additional project features and/or mitigation measures to address potential air quality impacts. The College Area CPU does not propose industrial land uses.

Future site-specific discretionary development projects under the College Area CPU that would involve stationary source emissions subject to SDAPCD permitting would be required to implement Blueprint SD PEIR MM-AQ-2. See Section VII in the Addendum for additional details. Similar to the Blueprint SD PEIR, implementation of Blueprint SD PEIR MM-AQ-2 is anticipated to be sufficient to reduce significant impacts. However, as the requirement for an HRA would not apply to ministerial projects and, at a program level of review, the specific details of individual projects and the feasibility of Blueprint SD PEIR MM-AQ-2 to fully mitigate all potential impacts are not known, impacts related to sensitive receptors would be significant and unavoidable. Therefore, the proposed project is consistent with the impact conclusions identified in the Blueprint SD PEIR for sensitive receptors, and would not result in new significant impacts or a substantial increase in the severity of previously identified impacts.

V.2.4 Odors

Blueprint SD PEIR

Air quality impacts related to odors are evaluated in Section 4.2.4 (Issue 4) of the Blueprint SD PEIR.

The Blueprint SD PEIR concluded that impacts associated with construction-generated odors would be less than significant. The Blueprint SD PEIR noted that implementation of the Blueprint SD Initiative, Hillcrest FPA, and University CPU is not anticipated to introduce land uses that would generate substantial odors adjacent to sensitive receptors. Future projects would be required to comply with applicable regulations for nuisance odors, such as SDAPCD Rule 51 and SDMC Section 142.0710. SDAPCD Rule 51 (Nuisance) prohibits the discharge of air contaminants or other material which cause injury, detriment, nuisance or annoyance to a considerable number of persons or which endanger the comfort, repose, health or safety of such persons or cause injury or damage to

business or property. SDMC Section 142.0710 establishes that air contaminants including smoke, charred paper, dust, soot, grime, carbon, noxious acids, toxic fumes, gases, odors, and particulate matter, or any emissions that endanger human health, cause damage to vegetation or property, or cause soiling shall not be permitted to emanate beyond the boundaries of the premises upon which the use emitting the contaminants is located.

The Blueprint SD PEIR determined that at a program level of review, the specific details of future individual projects are not known at this time and thus concluded that direct impacts related to objectionable odors would be significant. Because odors are localized to a specific area, such impacts would not combine to result in a significant cumulative impact and thus, the Blueprint SD PEIR concluded that cumulative impacts would be less than significant.

The Blueprint SD PEIR included mitigation measure MM-AQ-3 which reinforces required compliance with SDAPCD Rule 51 and SDMC Section 142.0710. The Blueprint SD PEIR noted, however, that ministerial projects would not be subject to a detailed odor evaluation and, at a program level of review, the specific details of individual projects and the feasibility of MM-AQ-3 to fully mitigate potential odor impacts are not known. Thus, the Blueprint SD PEIR concluded direct air quality impacts related to odors would be significant and unavoidable.

College Area CPU

Emissions from construction equipment, such as diesel exhaust, and VOC from architectural coatings and paving activities may generate odors; however, these odors would be temporary and intermittent, confined to the immediate vicinity of construction equipment, and expected to cease upon the drying or hardening of the odor-producing materials. Therefore, impacts associated with construction-generated odors would be less than significant.

The College Area CPU would allow for increases in residential and mixed-use development but is not anticipated to introduce land uses that would generate substantial nuisance odors adjacent to sensitive receptors. Common facilities that may generate objectionable odors during operation include wastewater treatment plants, landfills, and painting/coating operations (e.g., auto body shops), among others. Planned land uses in the CPU area would not encourage or support uses that would be associated with significant odor generation. Odors associated with restaurants or other commercial uses would be similar to existing residential and food service uses within the community. Additionally, auto body shops would be required to comply with SDAPCD Rule 51 (Public Nuisance), which prohibits the discharge of air contaminants or other materials that would be a nuisance or annoyance to the public. Future development projects would also be required to comply with SDMC regulations for air contaminants (SDMC Section 142.0710). Although implementation of the project is not anticipated to create operational-related objectionable odors affecting a substantial number of people within the City, at a program level of review the specific details of individual projects are not known at this time; therefore, impacts related to objectionable odors would be significant.

Future discretionary projects implemented under the College Area CPU with the potential to result in objectionable odors would be required to implement Blueprint SD PEIR MM-AQ-3. See Section VII of the Addendum for additional details. Projects that require discretionary review would also undergo a project-specific environmental review at the appropriate future time to evaluate the

project's consistency with applicable General Plan and CPU policies and could identify additional project features and/or mitigation measures to address potential air quality impacts. However, ministerial projects would not be subject to a detailed odor evaluation and, at a program level of review, the specific details of individual projects and the feasibility of MM-AQ-3 to fully mitigate potential impacts are not known. Impacts would be significant and unavoidable. Therefore, the proposed project is consistent with the impact conclusions identified in the Blueprint SD PEIR for odors, and would not result in new significant impacts or a substantial increase in the severity of previously identified impacts.

V.2.5 Conclusion

Based on the foregoing analysis and information, there is no evidence that the College Area CPU would require a major change to the Blueprint SD PEIR relative to air quality. The Blueprint SD PEIR concluded that air quality impacts related to conflicts with air quality plans would be significant until revised land use maps and housing and employment forecasts are provided to SANDAG for the RAQS and SIP updates when planning documents are updated, and no mitigation was identified. Likewise, associated impacts resulting from the project would also be significant until the land use plan and housing/employment forecasts of the proposed College Area CPU are incorporated into the RAQS and SIP to accurately reflect anticipated growth due to the project. Future discretionary development projects consistent with the College Area CPU would be required to implement Blueprint SD PEIR MM-AQ-1. Future discretionary development projects under the College Area CPU that would involve stationary source emissions subject to SDAPCD permitting or that would involve heavy industrial land uses or other land uses that would involve substantial sources of mobile source diesel emissions would be required to implement Blueprint SD PEIR MM-AQ-2. Future discretionary development projects consistent with the College Area CPU with the potential to result in objectionable odors would be required to implement Blueprint SD PEIR MM-AQ-3. Consistent with the Blueprint SD PEIR, impacts would remain significant even with implementation of the Blueprint SD PEIR mitigation measures. The College Area CPU would not result in any new significant air quality impacts, nor would it result in a substantial increase in the severity of air quality impacts from those described in the Blueprint SD PEIR.

V.3 Biological Resources

A Biological Resources Report (BRR) was prepared for the project by Rocks Biological Consulting (Rocks 2025). The BRR provides a program-level assessment of potential impacts to biological resources that may occur through the implementation of the College Area CPU. The BRR is included as Attachment 1 to this Addendum.

V.3.1 Sensitive Species

Blueprint SD PEIR

Biological resources impacts related to sensitive species are evaluated in Section 4.3.4 (Issue 1) of the Blueprint SD PEIR.

The Blueprint SD PEIR concluded that future site-specific development projects may have the potential to impact sensitive plant and wildlife species either directly through the loss of habitat (including critical habitat) and/or direct take, or indirectly by placing development in or adjacent to sensitive habitat. Potential impacts to federal- or state listed species, MSCP Covered Species, Narrow Endemic Species, plant species with a California Native Plant Society (CNPS) Rare Plant Rank of 1 or 2, and wildlife species included on the California Department of Fish and Wildlife's (CDFW's) Special Animals List would be significant. Potential impacts to birds covered by the Migratory Bird Treaty Act (MBTA) would be avoided by adherence to the requirements of this law. However, the Blueprint SD PEIR stated that at a program level of review it cannot be ensured that all impacts could be feasibly reduced to less than significant and thus, the Blueprint SD PEIR concluded that direct and cumulative impacts to sensitive species would be significant.

The Blueprint SD PEIR identified mitigation for future projects that could directly and/or indirectly impact sensitive species. Such future projects would be required to implement MM-BIO-1, which reinforces required compliance with the City's ESL Regulations, Biology Guidelines, and applicable federal, state, and local Habitat Conservation Plans including, but not limited to, the City's MSCP SAP and VPHCP and implementation of avoidance, minimization, and mitigation measures in accordance with the City's ESL Regulations, Biology Guidelines, MSCP SAP, and VPHCP. Nevertheless, at the program level of review and without project-specific details, the Blueprint SD PEIR determined that it cannot be known with certainty that it would be feasible to mitigate all significant future project-specific impacts to less than significant due to the potential for deviations from the City's ESL Regulations to be approved that may allow for limited instances of impacts to occur that are not fully mitigated. Consequently, the Blueprint SD PEIR concluded that direct and cumulative impacts to sensitive species would be significant and unavoidable.

College Area CPU

Based on a general biological database and literature review conducted for the College Area CPU, a total of 15 sensitive plant species and 25 sensitive wildlife species have been historically identified within or immediately adjacent to the College Area CPU area. Other special-status plant and wildlife species with potential to occur within the CPU area were identified through a search of the California Natural Diversity Database (CNDDB) and U.S Fish and Wildlife Service (USFWS) records (refer to Tables 4 and 5 in the BRR) as well as recent biological reports for the area. Many of these occurrences are within the SDSU campus or are located in open space areas surrounding I-8.

Future development projects consistent with the College Area CPU may have the potential to impact sensitive plant and wildlife species either directly through the loss of habitat and/or direct take, or indirectly by placing development in or adjacent to sensitive habitat. Potential impacts to federal- or state listed species, MSCP Covered Species, Narrow Endemic Species, plant species with a CNPS Rare Plant Rank of 1 or 2, and wildlife species included on the CDFW's Special Animals List would be significant. Potential impacts to birds covered by the MBTA would be avoided by adherence to MBTA requirements. However, at a program level of review it cannot be ensured that all impacts would be feasibly reduced to less than significant; therefore, impacts to sensitive species would be potentially significant.

Future development projects consistent with the College Area CPU would be analyzed at the project level to ensure conformance with applicable biological regulations and mitigation requirements.

Future projects that could result in significant impacts to sensitive biological resources would be required to adequately identify and quantify potential site-specific and cumulative project impacts pursuant to the City's ESL Regulations and Biology Guidelines. Per the City's Biology Guidelines, a biological resources report is required for proposed development projects that are subject to the ESL Regulations and/or where the CEQA review has determined that there may be a significant impact on other biological resources considered sensitive under CEQA. To that end, future discretionary development projects consistent with the College Area CPU would be required to implement Blueprint SD PEIR MM-BIO-1 which reinforces required compliance with existing federal, state and local regulations and Habitat Conservation Plans. See Section VII of this Addendum for additional details. Additionally, future discretionary development projects would be reviewed for consistency with applicable CPU policies, including but not limited to, Policy 7.5 and Policy 7.6 which promote open space conservation and restoration of natural lands on lands designated as open space, including lands within the MHPA, and call for protecting and strengthening sensitive native habitats. Implementation of Blueprint SD PEIR MM-BIO-1 in addition to required compliance with existing federal, state and local regulations and adherence to the CPU policy framework for future discretionary projects would ensure that potential impacts to sensitive species resulting from future development anticipated under the project would be avoided, minimized, and mitigated to the extent feasible consistent with applicable federal, state, and City regulations and conservation plans.

Implementation of the City's regulatory and policy framework typically is sufficient to ensure impacts are reduced to less than significant; however, at a program level of review and without project-specific details, it cannot be known with certainty that it would be feasible to mitigate all significant impacts of future projects to less than significant due to the potential for deviations from the City's ESL Regulations to be approved that may allow for limited instances of impacts to occur that are not fully mitigated. For example, a wetland deviation outside of the Coastal Zone under the Economic Viability Option [SDMC Section 143.0510(d)(d)(1)] could be allowed if the strict application of the regulations would otherwise deprive a property of economically viable use. This would also require findings under SDMC Section 126.054(c) that there are no feasible measures that can further minimize the potential adverse effects on environmentally sensitive lands and the proposed deviation is the minimum necessary to afford relief from special circumstance or conditions applicable to the land and not of the applicant's making. Therefore, impacts would be significant and unavoidable, and the proposed project is consistent with the impact conclusions identified in the Blueprint SD PEIR for sensitive species, and would not result in new significant impacts or a substantial increase in the severity of previously identified impacts.

V.3.2 Sensitive Habitats

Blueprint SD PEIR

Biological resources impacts related to sensitive habitats are evaluated in Section 4.3.4 (Issue 2) of the Blueprint SD PEIR.

The Blueprint SD PEIR concluded that future development projects consistent with the Blueprint SD Initiative, Hillcrest FPA, and University CPU could potentially have an impact on sensitive wetland communities and upland (Tier I, Tier II, Tier IIIA, and Tier IIIB) habitat that is present within the plan areas. Development is anticipated to be focused within developed urban areas that have been previously disturbed and have existing commercial, industrial, residential, or employment uses;

however, some project areas could support sensitive habitats. The Blueprint SD PEIR noted that all future development including ministerial and discretionary projects would be reviewed for consistency with the City's ESL Regulations and if any ESL is present, a discretionary Site Development Permit or Neighborhood Development Permit would be required including an environmental review process that requires analysis demonstrating compliance with the City's ESL Regulations, Biology Guidelines, MSCP SAP, and VPHCP. Sensitive habitat in the plan areas is concentrated in the MHPA, which are conservation lands with limited potential for disturbance as regulated by the City's ESL Regulations, Biology Guidelines, MSCP SAP, and VPHCP. However, development may occur within or adjacent to the MHPA, subject to a Boundary Line Adjustment or Boundary Line Correction. Additionally, development may occur within non-MHPA sensitive habitats. The Blueprint SD PEIR concluded that at a program level of review, direct and cumulative impacts to sensitive habitats would be significant.

The Blueprint SD PEIR identified mitigation for future projects that could directly and/or indirectly impact sensitive habitat. Such future projects would be required to implement MM-BIO-1, which reinforces required compliance with the City's ESL Regulations, Biology Guidelines, and applicable federal, state, and local Habitat Conservation Plans including, but not limited to, the City's MSCP SAP and VPHCP and implementation of avoidance, minimization, and mitigation measures in accordance with the City's ESL Regulations, Biology Guidelines, MSCP SAP, and VPHCP. Nevertheless, at the program level of review and without project-specific details, the Blueprint SD PEIR determined that it cannot be known with certainty that it would be feasible to mitigate all significant future project-specific impacts to less than significant due to the potential for deviations from the City's ESL Regulations to be approved that may allow for limited instances of impacts to occur that are not fully mitigated. As a result, the Blueprint SD PEIR concluded that direct and cumulative impacts to sensitive habitats would be significant and unavoidable.

College Area CPU

The College Area CPU area supports eight sensitive vegetation communities, including two wetland communities and six upland communities, as identified in Table 3, *Sensitive Vegetation Communities within the College Area CPU Area*, and shown in Figure 10, *Vegetation Communities and Land Cover Types*. These sensitive vegetation communities are generally located within the canyons and slopes between the developed mesa tops. These areas are either on privately owned parcels or are designated as City open space within or partially within the MHPA. Some of the MHPA lands within canyons and slopes are 100% conserved.

Table 3
SENSITIVE VEGETATION COMMUNITIES WITHIN THE COLLEGE AREA CPU AREA

Vegetation Community	Acreage	Tier
<i>Wetland</i>		
Southern cottonwood-willow riparian forest	5.1	--
Southern riparian scrub	2.3	--
Total Wetland Communities	7.4	
<i>Sensitive Uplands</i>		
Chapparal	7.0	IIIA
Chamise chapparal	32	IIIA
Diegan coastal sage scrub	181.4	II

Table 3
SENSITIVE VEGETATION COMMUNITIES WITHIN THE COLLEGE AREA CPU AREA

Vegetation Community	Acreage	Tier
Maritime succulent scrub	18.3	I
Southern maritime chaparral	37.5	I
Non-native grassland	12.1	IIIB
Total Sensitive Upland Communities	288.3	

Source: Rocks 2025

NOTE: Numbers in the table are approximate.

Future site-specific development projects consistent with the College Area CPU could have an impact on sensitive wetland communities and upland (Tier I, Tier II, Tier IIIA, and Tier IIIB) habitat that is present within the College Area CPU area. Development consistent with the College Area CPU is anticipated to be focused within developed urban areas that have been previously disturbed. However, some project areas could support, or be adjacent to, sensitive habitats. While no vernal pool resources are currently mapped in the College Area CPU area, they may be identified at a project level during future site-specific project surveys. All future site-specific development, including ministerial and discretionary projects, would be reviewed for consistency with the City's ESL Regulations and if any ESL is present, a discretionary Site Development Permit or Neighborhood Development Permit would be required including an environmental review process that requires analysis demonstrating compliance with the City's ESL Regulations, Biology Guidelines, MSCP SAP, and VPHCP. Sensitive habitat in the College Area CPU area is concentrated in the MHPA. However, future site-specific development that may occur within or partially within the MHPA may be subject to a Boundary Line Adjustment or Boundary Line Correction. Additionally, future site-specific development may occur within non-MHPA sensitive habitats. At a program level of review, without site-specific project details, impacts to sensitive habitats would be potentially significant.

Future site-specific development projects consistent with the College Area CPU would be analyzed at the individual project level to ensure conformance with applicable biological regulations and mitigation requirements. Future site-specific projects that could result in significant impacts to sensitive biological resources would be required to adequately identify and quantify potential project impacts pursuant to the City's ESL Regulations and Biology Guidelines. Per the City's Biology Guidelines, a biological resources report is required for proposed development projects which are subject to the ESL Regulations and/or where the CEQA review has determined that there may be a significant impact on other biological resources considered sensitive under CEQA. As such, future site-specific discretionary development projects consistent with the College Area CPU would be required to implement Blueprint SD PEIR MM-BIO-1 which reinforces required compliance with existing federal, state and local regulations and Habitat Conservation Plans. See Section VII of this Addendum for additional details. Additionally, future discretionary development projects would be reviewed for consistency with applicable CPU policies including Policy 7.5 which promotes open space conservation and restoration of natural lands on lands designated as open space, including lands within the MHPA; and Policy 7.6 which calls for protecting and strengthening sensitive native habitats. Implementation of Blueprint SD PEIR MM-BIO-1 in addition to required compliance with existing federal, state and local regulations and conservation plans and adherence to the CPU policy framework for future discretionary projects would ensure that potential impacts to sensitive habitats resulting from future development anticipated under the project would be avoided, minimized and mitigated to the extent feasible, consistent with all applicable federal, state, and City regulations and conservation plans.

Implementation of the City's regulatory and policy framework typically is sufficient to ensure impacts are avoided, minimized or are reduced to less than significant; however at this program level of review and without project-specific details, it cannot be known with certainty that it would be feasible to mitigate all significant future project-specific impacts to less than significant due to the potential for deviations from the City's ESL Regulations to be approved that may allow for limited instances of impacts to occur that are not fully mitigated. Therefore, impacts would be significant and unavoidable, and the proposed project is consistent with the impact conclusions identified in the Blueprint SD PEIR for sensitive habitats, and would not result in new significant impacts or a substantial increase in the severity of previously identified impacts.

V.3.3 Wetlands

Blueprint SD PEIR

Biological resource impacts related to wetlands are evaluated in Section 4.3.4 (Issue 3) of the Blueprint SD PEIR.

The Blueprint SD PEIR concluded that future development projects consistent with the Blueprint SD Initiative, Hillcrest FPA, and University CPU could potentially have an impact on wetlands or other jurisdictional wetland areas that are present within the plan areas. Wetlands impacts are regulated by the City in accordance with the City's ESL Regulations, Biology Guidelines, MSCP SAP, and VPHCP. Additionally, impacts to jurisdictional features are subject to regulation by the U.S. Army Corps of Engineers (USACE) in accordance with Section 404 of the federal Clean Water Act (CWA), the Regional Water Quality Control Board (RWQCB) in accordance with Section 401 of the CWA, and the California Department of Fish and Wildlife (CDFW) under Section 1600 of the California Fish and Game Code, as applicable. Although wetlands in the plan areas are concentrated in the MHPA, including canyons and creeks, the Blueprint SD PEIR determined that since site-specific future development is unknown at this time, there is a potential that wetlands could be affected. Implementation of the City's ESL Regulations, Biology Guidelines, MSCP SAP, and VPHCP would ensure impacts to wetlands would be avoided to the extent feasible and a wetland buffer provided around all wetlands as appropriate to protect the functions and values of the wetland. Implementation of the existing regulatory framework would reduce potential impacts to wetlands during project level reviews. However, at a program level of review without site-specific plans available for review, the Blueprint SD PEIR determined that it cannot be ensured that all impacts to wetlands would be mitigated to a less than significant level. Thus, the Blueprint SD PEIR concluded that direct and cumulative impacts to wetlands would be significant and unavoidable.

The Blueprint SD PEIR identified mitigation for future discretionary projects that could directly and/or indirectly impact wetlands. Such future discretionary projects would be required to implement MM-BIO-1, which reinforces required compliance with the City's ESL Regulations, Biology Guidelines, and applicable federal, state, and local Habitat Conservation Plans including, but not limited to, the City's MSCP SAP and VPHCP and requires that future development implement avoidance, minimization, and mitigation measures in accordance with the City's ESL Regulations, Biology Guidelines, MSCP SAP, and VPHCP. Nevertheless, at the program level of review and without project-specific details, the Blueprint SD PEIR determined that it cannot be known with certainty that it would be feasible to mitigate all significant future project-specific impacts to less than significant

due to the potential for deviations from the City's ESL Regulations to be approved that may allow for limited instances of impacts to occur that are not fully mitigated. Consequently, the Blueprint SD PEIR concluded that direct and cumulative impacts to wetlands would be significant and unavoidable.

College Area CPU

Vegetation communities in the College Area CPU area that may qualify as jurisdictional aquatic resources include southern cottonwood-willow riparian forest and southern riparian scrub as described above in Section V.3.2, *Sensitive Habitats*. In addition to these vegetation communities, the USFWS National Wetlands Inventory (NWI; 2020a) database maps freshwater forested/shrub wetlands and riverine regions within the College Area CPU area. NWI-mapped riverine and freshwater forested/shrub wetlands features occur in the canyon open spaces throughout the College Area CPU area generally in areas of relatively low topography between development. NWI-mapped features occur as tributaries associated with the San Diego River and/or the Murray Reservoir.

Future development projects consistent with the College Area CPU could have an impact on wetlands or other jurisdictional wetland areas that are present within the College Area CPU area. Wetlands impacts are regulated by the City in accordance with the City's Biology Guidelines, ESL Regulations, VPHCP, and MSCP SAP. Additionally, impacts to jurisdictional features would be subject to regulation by the USACE in accordance with Section 404 of the CWA, the RWQCB in accordance with Section 401 of the CWA, and the CDFW under Section 1600 of the California Fish and Game Code, as applicable. Since site-specific future development is unknown at this time, there is a potential that wetlands could be affected. Implementation of the City's ESL Regulations, Biology Guidelines, MSCP SAP, and VPHCP would ensure impacts to wetlands would be avoided, minimized, and mitigated to the extent feasible and a wetland buffer provided around wetlands as appropriate to protect the functions and values of the wetland. Implementation of the existing regulatory framework would reduce potential impacts to wetlands during project-level reviews. However, at a program level of review without site-specific plans available for review, it cannot be ensured that all impacts to wetlands would be mitigated to a less than significant level. Impacts to wetlands would be potentially significant.

Future development projects consistent with the College Area CPU would be analyzed at the individual project level to ensure conformance with applicable biological regulations and mitigation requirements. All future proposed development projects that have potentially jurisdictional aquatic resources on or adjacent to the project area would be required to identify such jurisdictional features and the corresponding boundary extents of identified jurisdictional areas, and to determine if proposed project impacts would occur. As such, future discretionary development projects consistent with the College Area CPU would be required to implement Blueprint SD PEIR MM-BIO-1 which reinforces required compliance with existing federal, state and local regulations and Habitat Conservation Plans. See Section VII of this Addendum for additional details. Implementation of Blueprint SD PEIR MM-BIO-1 in addition to required compliance with existing federal, state and local regulations would ensure that potential impacts to wetlands resulting from future development anticipated under the project would be avoided, minimized and mitigated to the extent feasible, consistent with all applicable federal, state, and City regulations and conservation plans.

Implementation of the City's regulatory framework typically is sufficient to ensure impacts are reduced to less than significant; however, at this program level of review and without project-specific details, it cannot be known with certainty that it would be feasible to mitigate all significant future project-specific impacts to less than significant due to the potential for deviations from the City's ESL Regulations to be approved that may allow for limited instances of impacts to occur that are not fully mitigated. Therefore, impacts would be significant and unavoidable, and the proposed project is consistent with the impact conclusions identified in the Blueprint SD PEIR for wetlands, and would not result in new significant impacts or a substantial increase in the severity of previously identified impacts.

V.3.4 Wildlife Corridors and Nursery Sites

Blueprint SD PEIR

Biological resource impacts related to wildlife corridors and nursery sites are evaluated in Section 4.3.4 (Issue 4) of the Blueprint SD PEIR.

The Blueprint SD PEIR concluded that future development in accordance with the Blueprint SD Initiative, Hillcrest FPA, and University CPU areas would be focused within developed urban areas that have been previously disturbed and have existing commercial, industrial, residential, or employment uses. Migratory wildlife corridors in the Blueprint SD Initiative, Hillcrest FPA, and University CPU areas are concentrated in areas designated as Open Space and are located within the MHPA, and no Open Space land use designation would be changed by the Blueprint SD Initiative, Hillcrest FPA, or University CPU. Future site-specific development projects would undergo environmental review to determine potential impacts on wildlife corridors, and impacts would be mitigated in accordance with the City's ESL Regulations, Biology Guidelines, MSCP SAP, and VPHCP. Due to the anticipated location of development being concentrated in already developed or urban areas combined with the City's regulatory framework that protects conservation areas and sensitive habitats, the Blueprint SD PEIR determined that the Blueprint SD Initiative, Hillcrest FPA, and University CPU would not substantially interfere with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, including linkages identified in the MSCP SAP, nor would they impede the use of native wildlife nursery sites. The Blueprint SD PEIR concluded direct and cumulative impacts to wildlife corridors and nursery sites would therefore be less than significant.

College Area CPU

No MSCP-mapped regional wildlife corridors occur within the College Area CPU area. Undeveloped, open space areas in the College Area CPU area are surrounded by existing development and transportation corridors, and do not connect with large open space or conservation lands.

Due to the anticipated location of future development being concentrated in previously developed or urban areas combined with the City's regulatory framework which protects conservation areas and sensitive habitats, implementation of the College Area CPU would not substantially interfere with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, including linkages identified in the MSCP SAP, nor would the project impede the use of native wildlife nursery sites. Impacts to wildlife corridors and

nursery sites would be less than significant. Therefore, the proposed project is consistent with the impact conclusions identified in the Blueprint SD PEIR for wildlife corridors and nursery sites, and would not result in new significant impacts or a substantial increase in the severity of previously identified impacts.

V.3.5 Conservation Planning

Blueprint SD PEIR

Biological resource impacts related to conservation planning are evaluated in Section 4.3.4 (Issue 5) of the Blueprint SD PEIR.

The Blueprint SD PEIR concluded that future development projects consistent with the Blueprint SD Initiative, Hillcrest FPA, and University CPU would be subject to compliance with applicable current and future local, state, and federal policies, guidelines, directives, and regulations, including but not limited to, the state and federal Endangered Species Act (ESA), the San Diego County MSCP, and the City's ESL Regulations, Biology Guidelines, MSCP SAP, and VPHCP. Revisions to the General Plan Conservation Element, Hillcrest FPA, and University CPU, incorporated updated policies to support implementation of the City's MSCP SAP and VPHCP and included policies aimed at resource protection and preservation of the MHPA and open space. Future development within the Blueprint SD Initiative, Hillcrest FPA, and University CPU areas would be evaluated for compliance with the City's ESL Regulations, Biology Guidelines, MSCP SAP, and VPHCP, in addition to applicable General Plan and community plan policies. Project-specific requirements and necessary avoidance and mitigation measures would be determined at the project level. Adherence to the City's regulatory and policy frameworks would avoid future significant impacts. Therefore, the Blueprint SD PEIR determined that the Blueprint SD Initiative, Hillcrest FPA, and University CPU would not result in a conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state habitat conservation plan, either within the MSCP SAP area or in the surrounding region. The Blueprint SD PEIR concluded that direct and cumulative impacts related to conservation planning would therefore be less than significant.

College Area CPU

Future development projects consistent with the College Area CPU would be subject to compliance with applicable current and future local, state, and federal policies, guidelines, directives, and regulations, including but not limited to, the state and federal ESA, the City's ESL Regulations and Biology Guidelines, and the City's MSCP SAP and VPHCP. A detailed analysis of the proposed CPU's consistency with conservation plans can be found in Section 5 of Attachment 1 to this Addendum. Future development within the College Area CPU area would be evaluated for compliance with the City's MSCP SAP, VPHCP, Biology Guidelines, and ESL Regulations. Additionally, future discretionary development would be reviewed for consistency with applicable College Area CPU policies including, but not limited to, Policy 6.12 which emphasizes that the design of trails within the Multi-Habitat Planning Area and Open Space should comply with the Environmentally Sensitive Lands Regulations and Multiple Species Conservation Program Subarea Plan; and Policy 7.5 which promotes open space conservation and restoration of natural lands on lands designated as open space, including lands within the MHPA. Future site-specific project requirements, site-specific biological surveys, and necessary avoidance and mitigation measures would be determined at the project level, and

adherence to the City's regulatory and policy framework would avoid future significant impacts. Therefore, the College Area CPU would not result in a conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state habitat conservation plan, either within the MSCP SAP area or in the surrounding region. Impacts would be less than significant. Therefore, the proposed project is consistent with the impact conclusions identified in the Blueprint SD PEIR for conservation planning and would not result in new significant impacts or a substantial increase in the severity of previously identified impacts.

V.3.6 Conclusion

Based on the foregoing analysis and information, there is no evidence that the College Area CPU would require a major change to the Blueprint SD PEIR relative to biological resources. The Blueprint SD PEIR concluded that impacts to sensitive species, sensitive habitats, and wetlands were significant and included Blueprint SD PEIR MM-BIO-1 to reduce impacts although impacts would remain significant. Similarly, future development projects consistent with the College Area CPU that could potentially affect sensitive biological resources, including sensitive species, sensitive habitats, and/or wetlands, would implement Blueprint SD PEIR MM-BIO-1. Impacts, however, would remain significant even with the implementation of Blueprint SD PEIR MM-BIO-1. The Blueprint SD PEIR concluded that impacts related to wildlife corridors and nursery sites and conservation planning were less than significant and no mitigation was required. Likewise, the project would not substantially interfere with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. The project also would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state habitat conservation plan. The College Area CPU would not result in any new significant biological resource impacts, nor would it result in a substantial increase in the severity of biological resource impacts from those described in the Blueprint SD PEIR.

V.4 Cultural Resources

A Historic Context Statement was prepared for the project by Page & Turnbull (Page & Turnbull 2023) to address important themes and property types associated with the development of the College Area community. The Historic Context Statement is included as Attachment 2 to this Addendum. A Cultural Resources Constraints and Sensitivity Analyses was also prepared for the project by HELIX Environmental Planning (HELIX 2025). The Cultural Resources Constraints and Sensitivity Analyses is included as Attachment 3 to this Addendum.

V.4.1 Historic Structures, Objects, or Sites

Blueprint SD PEIR

Cultural resources impacts related to historic structures, objects, or sites are evaluated in Section 4.4.4 (Issue 1) of the Blueprint SD PEIR.

The Blueprint SD PEIR determined that although the SDMC provides for the regulation and protection of designated and potential historical resources, at a program level of review it is not

possible to ensure the successful preservation of all historic built environment resources, objects, and sites within the Blueprint SD Initiative, Hillcrest FPA, and University CPU areas. Thus, the Blueprint SD PEIR concluded that at a program level of review, potential direct and cumulative impacts to historical resources would be significant.

The Blueprint SD PEIR includes mitigation for future projects consistent with the Blueprint SD Initiative, Hillcrest FPA, and University CPU that could directly and/or indirectly affect a historic building, historic structure, or historic object as defined in the City's Historical Resources Regulations and Historical Resources Guidelines. Future discretionary projects would be required to implement MM-HIST-1, which reinforces required compliance with the City's Historical Resources Guidelines and Historical Resources Regulations (SDMC Sections 143.0201–143.0280) and requires implementation of avoidance, minimization, and mitigation measures in accordance with the City's Historical Resources Regulations and Historical Resources Guidelines.

With implementation of MM-HIST-1, future development, redevelopment, and related activities facilitated by the Blueprint SD Initiative, University CPU, and Hillcrest FPA would be required to implement SDMC regulations for the protection of designated and potential historical resources. Nevertheless, the Blueprint SD PEIR determined it is not possible to ensure the successful preservation of all historic built environment resources within the project areas or anticipate potential deviations at a program level. Furthermore, the Blueprint SD PEIR noted that pursuant to SDMC Section 143.0260, a potential deviation from the City's Historical Resources Regulations may be considered if a proposed development cannot to the maximum extent feasible comply with the regulations so long as the decision maker makes the applicable findings in SDMC Section 126.0504. The Blueprint SD PEIR therefore concluded that direct and cumulative impacts to historic structures, objects, or sites would be significant and unavoidable.

College Area CPU

As discussed in the Cultural Resources Constraints and Sensitivity Analysis prepared by HELIX (Attachment 3), a records search of the California Historical Resources Information System (CHRIS) was conducted by the City in support of the CPU. In addition, HELIX conducted a review of the State Office of Historic Preservation (OHP) historic properties directory, California Register of Historical Resources (CRHR), the National Register of Historic Places (NRHP), and the City of San Diego's Historical Resources Register.

The records search of the CHRIS, on file at the South Coastal Information Center (SCIC), identified a total of 58 cultural resources within the College Area CPU area, 51 of which consist of built environment resources (typically buildings, structures, or objects) and the remaining seven are archaeological resources (discussed in Section V.4.2, below). Of the 51 built environment resources, eight are situated inside the SDSU property and 43 consist of built environment resources situated outside of the SDSU property, with the majority being residential buildings. The SDSU campus as a whole is listed on the NRHP, with contributing elements to its listing consisting of buildings, two historic objects, one historic structure, and one historic site. See Attachment 3 for additional details. In addition, based on the Historic Context Statement prepared for the College Area CPU (Page & Turnbull 2023), there are 10 designated historical resources (residences) within the College Area CPU listed on the City's Historical Resources Register, and it was determined that other historical

resources may be present, such as agricultural properties from the late 19th century and individual homes in various postwar subdivisions. See Attachment 2 for additional details.

Future discretionary development within the College Area CPU area would be reviewed for consistency with the historic preservation policies in the General Plan and policies within the Historic Preservation Element of the College Area CPU (Policies 9.1 through 9.10). All future development in the College Area CPU Area would also be required to comply with the SDMC which provides for the regulation and protection of designated and potential historical resources as described above. However, it is not possible to ensure the successful preservation of all historic built environment resources within the College Area CPU area. Future site-specific development and redevelopment that may result from implementation of the College Area CPU could result in the alteration of a historical resource, notwithstanding application of the Historical Resources Regulations and Historical Resources Guidelines and any project-specific mitigation measures. Pursuant to SDMC Section 143.0260, a deviation from the City's Historical Resources Regulations may be considered under certain circumstances as described below:

- If a proposed development cannot to the maximum extent feasible comply with this division [Historical Resources Regulations], a deviation may be considered in accordance with decision Process Four, or Process CIP-Five for capital improvement program projects or public projects.
- The minimum deviation to afford relief from the regulations of this division [Historical Resources Regulations] and accommodate development may be granted only if the decision maker makes the applicable findings in SDMC Section 126.0504.
- If a deviation for demolition or removal of a designated historical resource or a contributing structure within a historical district is approved, a Building Permit application must be deemed complete for the new development on the same premises prior to issuance of a Demolition/Removal Permit.

Direct impacts of future site-specific projects under the College Area CPU may include substantial alteration, relocation, or demolition of historic buildings, structures or sites. Indirect impacts may include the introduction of visual, audible, or atmospheric effects that are out of character with a historic property or alter its setting, when the setting contributes to the resource's significance. Thus, potential impacts to individual historical resources could occur where implementation of the College Area CPU would result in increased development potential and could result in a significant impact to historic buildings, structures, or sites.

Future discretionary projects implemented under the College Area CPU that could directly and/or indirectly affect a historical building, historical structure, or historical object as defined in the City's Historical Resources Regulations and Historical Resources Guidelines would be required to implement Blueprint SD PEIR MM-HIST-1, which reinforces required compliance with the SDMC regulations for the protection of designated and potential historical resources. See Section VII for additional details. Nevertheless, it is not possible to ensure the successful preservation of all historic built environment resources within the College Area CPU area at a program level of review without site-specific plans and details regarding potential deviations from the SDMC. Potential impacts to historical resources from the built environment would be significant and unavoidable. Therefore, the proposed project is consistent with the impact conclusions identified in the Blueprint SD PEIR for

historic structures, objects, and sites, and would not result in new significant impacts or a substantial increase in the severity of previously identified impacts.

V.4.2 Archaeological Resources

Blueprint SD PEIR

Cultural resources impacts related to archaeological resources are evaluated in Section 4.4.4 (Issue 2) of the Blueprint SD PEIR.

The Blueprint SD PEIR determined that while the existing federal, state, and local regulations would provide for the regulation and protection of archaeological resources, it is not possible to ensure the successful preservation of all archaeological resources. Therefore, the Blueprint SD PEIR concluded that potential direct and cumulative impacts to archaeological resources would be significant.

The Blueprint SD PEIR included mitigation for future discretionary development projects that could directly and/or indirectly affect a cultural resource. Such future projects would be required to implement MM-HIST-2 prior to the issuance of any discretionary permit. MM-HIST-2 specifically outlines steps to be taken to determine (1) the potential presence and/or absence of cultural resources, and (2) the appropriate mitigation for any significant resources that may be impacted. City review of all permit applications for any parcel identified as sensitive on the Cultural Resources Sensitivity Maps would ensure application of MM-HIST-2 when appropriate. However, the Blueprint SD PEIR determined that even with implementation of MM-HIST-2, the feasibility and efficacy of mitigation measures could not be determined at the program level of analysis. Thus, the Blueprint SD PEIR concluded that direct and cumulative impacts to archaeological resources would be significant and unavoidable.

College Area CPU

The records search of the CHRIS, on file at the SCIC, identified a total of seven archaeological resources within the College Area CPU area. These resources consist of two prehistoric archaeological sites, one historic archaeological site, two prehistoric isolated artifact finds, one isolated historic find, and a historic road. These recorded archaeological resources are briefly described below in Table 4, *Previously Recorded Archaeological Resources within the College Area CPU Area*, along with their status, eligibility for listing on the NRHP, CRHR, and City's Historical Resources Register, and recommendations for their management.

Table 4
PREVIOUSLY RECORDED ARCHAEOLOGICAL RESOURCES WITHIN THE COLLEGE AREA CPU AREA

Resource Number	Description	Development Impact	Eligibility Status	Recommendation
<i>Archaeological Sites (Prehistoric)</i>				
P-37-019016 / CA-SDI-13708	Habitation site with numerous artifacts such as manos, lithic tools, and flakes.	Partially destroyed	Unknown	Avoidance or eligibility evaluation*; Monitoring

Table 4
PREVIOUSLY RECORDED ARCHAEOLOGICAL RESOURCES WITHIN THE COLLEGE AREA CPU AREA

Resource Number	Description	Development Impact	Eligibility Status	Recommendation
P-37-037795 / CA-SDI-22509	Bedrock milling features	Undeveloped	Unknown	Avoidance or eligibility evaluation*; Monitoring
<i>Archaeological Sites (Historic)</i>				
P-37-029023 / CA-SDI-18589	Refuse scatter	Likely destroyed	Unknown	Monitoring
P-37-033557	Highway 395	N/A (destroyed**)	Eligible	No additional work
<i>Archaeological Isolates (Prehistoric)</i>				
P-37-009899	Isolated portable metate	Unknown	Ineligible	No additional work
P-37-015654	Isolated flake tool	N/A (collected)	Ineligible	No additional work
<i>Archaeological Isolates (Historic)</i>				
P-37-038270	Isolated bottle	N/A (collected)	Ineligible	No additional work

*Minimal subsurface testing or an extended Phase I testing program may be required to confirm that the resource is a non-significant resource type per the City's thresholds, or that the resource has been previously destroyed.

**Portion of the resource within the College Area CPU area is likely destroyed due to the development of Fairmount Avenue.

Source: HELIX 2025

As detailed in the Cultural Resources Constraints and Sensitivity Analysis, a Cultural Resources Sensitivity map addressing the College Area CPU area was developed to identify the sensitivity of areas for containing cultural resources (see Figure 14, *Cultural Sensitivity*). Areas identified as high sensitivity are those where significant prehistoric or historic archaeological resources have been documented or would have the potential to be identified. Generally, within areas of high sensitivity, the potential for encountering additional complex, intact, and potentially significant cultural resources would be high. No areas within the College Area CPU study area are assessed as having a high archaeological resources sensitivity. While the SDSU campus is listed in the NRHP, the campus and vicinity contain a low archaeological resource sensitivity due to the initial construction of the campus, location on the mesa top, as well as the regular maintenance and numerous campus upgrades that have occurred over the decades. A moderate sensitivity rating is generally applied to the undeveloped areas of the College Area CPU area within canyons or larger drainages or where there appears to have been limited grading and deposit of fill, or where there may be a likelihood of buried historic archaeological resources to be present. The remainder of the College Area CPU area is classified as low sensitivity as the soil that would have contained archaeological resources, if they were present, was generally removed during construction. The steep slopes of natural drainages and canyons, as well as artificial slopes and cuts produced during mass grading for the development of the area are additionally considered to have a low cultural resources sensitivity. See Attachment 3 for additional details.

The College Area CPU additionally identifies various policies related to the protection and preservation of cultural resources, including, but not limited to, Policy 9.1 which calls for conducting project-specific Native American tribal consultation early in the development review process to ensure culturally appropriate and adequate treatment and mitigation for significant archaeological sites with cultural or religious significance to the Native American community in accordance with all applicable local, state, and federal regulations and guidelines; and Policy 9.2 which calls for

conducting project specific investigations in accordance with all applicable laws and regulations to identify potentially significant tribal cultural and archaeological resources.

While there is very little undeveloped land or previously undisturbed soils within the College Area CPU area, future site-specific development and related construction activities could result in the alteration or destruction of prehistoric or historic archaeological resources, particularly within areas that have been categorized as moderate sensitivity and in proximity to areas where there are known, recorded archaeological resources. Therefore, future discretionary projects implemented under the College Area CPU that could directly and/or indirectly affect an archaeological resource would be required to implement Blueprint SD PEIR MM-HIST-2, which requires an initial assessment to determine the potential presence and/or absence of cultural resources, and the appropriate mitigation for any significant resources that may be impacted. See Section VII in the Addendum for additional details. However, even with implementation of Blueprint SD PEIR MM-HIST-2, the feasibility and efficacy of this mitigation measure cannot be determined at this program level of analysis. Thus, potential impacts to archaeological resources would be significant and unavoidable. Therefore, the proposed project is consistent with the impact conclusions identified in the Blueprint SD PEIR for archaeological resources, and would not result in new significant impacts or a substantial increase in the severity of previously identified impacts.

V.4.3 Human Remains

Blueprint SD PEIR

Cultural resources impacts related to human remains are evaluated in Section 4.4.4 (Issue 3) of the Blueprint SD PEIR.

The Blueprint SD PEIR concluded that future development within areas with moderate and high cultural resource sensitivity that could disturb native soils could have the potential to encounter human remains. Future projects consistent with the Blueprint SD Initiative, Hillcrest FPA, and University CPU would be subject to compliance with the City's Historical Resources Regulations (SDMC Section 143.0212). The City implements the Historical Resources Regulations during permit review which requires the City to review Cultural Resources Sensitivity Maps to identify properties that have a likelihood of containing archaeological sites. Sites with archaeological resource potential (within identified moderate or high resource sensitivity areas) could also contain human remains. This review is supplemented with a project-specific records search of the CHRIS data and Native American Heritage Commission (NAHC) Sacred Lands File by qualified staff, after which a site-specific archaeological survey may be required, when applicable, in accordance with the City's regulations and guidelines. Should the site have the potential for impacting human remains, measures would be recommended including archaeological and Native American monitoring during ground disturbance activities.

Additionally, Section 7050.5 of the California Health & Safety Code (H&SC) requires that in the event human remains are discovered during construction or excavation, all activities must be stopped in the vicinity of discovered human remains until the coroner can determine whether the remains are those of a Native American. If determined to be Native American, the coroner must contact the NAHC. The California H&SC provides a process and requirements for the identification and repatriation of collections of human remains or cultural items. Specifically, H&SC Sections 8010-

8030, otherwise known as CalNAGPRA, ensures that Native American human remains and cultural items are treated with respect and dignity during all phases of the archaeological evaluation process. CalNAGPRA applies the repatriation policy found in 25 United States Code Section 3001-3013, also known as NAGPRA. The act conveys to Native Americans of demonstrated lineal descent the human remains, including the funerary or religious items, that are held by federal agencies and federally supported museums, or that have been recovered from federal lands. NAGPRA makes the sale or purchase of Native American remains illegal, whether or not they were derived from federal or Native American lands.

The Blueprint SD PEIR concluded that with implementation of local, state, and federal regulations, direct and cumulative impacts to human remains would be less than significant.

College Area CPU

Future development within the College Area CPU area could occur within areas with moderate resource sensitivity that could disturb native soils that have the potential to contain human remains. Individual development projects implemented under the College Area CPU would be required to comply with local, state, and federal regulations including the California H&SC. With compliance with the existing regulatory framework pertaining to the identification and repatriation of collections of human remains or cultural items, impacts would be less than significant. Therefore, the proposed project is consistent with the impact conclusions identified in the Blueprint SD PEIR for human remains, and would not result in new significant impacts or a substantial increase in the severity of previously identified impacts.

V.4.4 Conclusion

Based on the foregoing analysis and information, there is no evidence that the College Area CPU would require a major change to the Blueprint SD PEIR relative to cultural resources. Future discretionary development projects consistent with the College Area CPU that could potentially affect historic built resources would implement Blueprint SD PEIR MM-HIST-1 and those that could potentially affect archaeological resources would implement Blueprint SD PEIR MM-HIST-2. As with the Blueprint SD PEIR, project impacts to historic structures, objects, or sites and archaeological resources would remain significant even after implementation of Blueprint SD PEIR MM-HIST-1 and Blueprint SD PEIR MM-HIST-2. Consistent with the Blueprint SD PEIR, impacts to human remains would be less than significant based on regulatory compliance. The College Area CPU would not result in any new significant cultural resources impacts, nor would it result in a substantial increase in the severity of cultural resources impacts from those described in the Blueprint SD PEIR.

V.5 Energy

V.5.1 Energy Resources

Blueprint SD PEIR

Energy impacts related to energy resources are evaluated in Section 4.5.4 (Issue 1) of the Blueprint SD PEIR.

The Blueprint SD PEIR evaluated impacts to energy resources in terms of construction-related energy consumption, transportation energy use, and operational energy use. With regard to construction, energy use would occur from fuel use from vehicles used by workers commuting to and from the construction site, and fuel use by vehicles and other equipment to conduct construction activities. Although details of future projects that could be implemented in accordance with the Blueprint SD Initiative, Hillcrest FPA, and University CPU are not known at this time, there are no known conditions in the Blueprint SD Initiative area, including the Climate Smart Village Areas, in the Hillcrest FPA area, or in the University CPU area that would require non-standard equipment or construction practices that would increase fuel-energy consumption above typical rates. Therefore, the Blueprint SD PEIR concluded that the construction of development facilitated by the Blueprint SD Initiative, Hillcrest FPA, and University CPU would not result in the use of excessive amounts of fuel or other forms of energy and direct and cumulative impacts would be less than significant.

Regarding transportation energy use, implementation of the Blueprint SD Initiative, Hillcrest FPA, and University CPU would facilitate the development of higher density and intensity of land uses around transit and employment centers, and would focus increased development intensities within the Climate Smart Village Areas. Climate Smart Village Areas are areas that have access to homes, jobs and mixed-use destinations and which encourage walking/rolling, biking and transit usage compared to driving. Development in these areas would support the City's CAP and associated energy reduction goals, primarily through reductions in vehicle trips. Thus, the Blueprint SD Initiative would provide a land use and policy framework that encourages the development of higher-density residential and mixed-use development in areas that would have the greatest VMT efficiency and hence lower energy expenditures. Long-term implementation of the Blueprint SD Initiative, Hillcrest FPA, and University CPU would not create a land use pattern that would result in the wasteful, inefficient, or unnecessary use of energy as it would place development in areas with access to transit and would encourage alternative transportation use. The Blueprint SD PEIR concluded that direct and cumulative impacts would be less than significant.

In addition, the Blueprint SD PEIR determined that future development facilitated by the implementation of the Blueprint SD Initiative, Hillcrest FPA, and University CPU would not result in the wasteful, inefficient, or unnecessary consumption of energy resources during operations as new development would be required to meet the mandatory energy requirements of the California Green Building Standards Code (CALGreen) and the Energy Code. Accordingly, the Blueprint SD PEIR concluded that associated direct and cumulative energy impacts would be less than significant.

College Area CPU

No known conditions exist in the College Area CPU area that would require non-standard equipment or construction practices that would increase fuel-energy consumption above typical rates. Construction of future development under the College Area CPU would not result in the wasteful, inefficient, or unnecessary consumption of energy resources. The College Area CPU facilitates and focuses future development of higher density land uses along transit corridors and mixed-use villages and nodes that have good access to homes, jobs, and mixed-use destinations and that encourage the use of transportation modes other than the automobile. This, in turn, supports the City's CAP and associated energy reduction goals, primarily through reductions in vehicle trips.

Consequently, long-term implementation of College Area CPU would not create a land use pattern that would result in the wasteful, inefficient, or unnecessary use of energy. In addition, future development under the College Area CPU would not result in the wasteful, inefficient, or unnecessary consumption of energy resources during operations as new development would be required to meet the mandatory energy requirements of CALGreen and the Energy Code. Impacts to energy resources resulting from implementation of the project would be less than significant. Therefore, the proposed project is consistent with the impact conclusions identified in the Blueprint SD PEIR for energy resources, and would not result in new significant impacts or a substantial increase in the severity of previously identified impacts.

V.5.2 Conflicts with Plans or Policies

Blueprint SD PEIR

Energy impacts related to conflicts with plans or policies are evaluated in Section 4.5.4 (Issue 2) of the Blueprint SD PEIR.

The Blueprint SD PEIR concluded that future projects would be subject to existing building and energy code regulations in place at the time they are implemented, such as CALGreen (Title 24, Part 11 of the CCR) and the Energy Code (Title 24, Part 6 of the CCR). Additionally, the Blueprint SD Initiative, Hillcrest FPA, and University CPU include land use and policy frameworks which support the development of a sustainable and efficient land use pattern and mobility system, encourage sustainable design that is energy efficient, and promote renewable energy use. The Blueprint SD PEIR determined that development facilitated by the implementation of the Blueprint SD, Hillcrest FPA, and University CPU would not conflict with any state or local plan for renewable energy or energy efficiency and concluded that direct and cumulative energy impacts related to conflicts with plans or policies would be less than significant.

College Area CPU

Subsequent site-specific development projects under the College Area CPU would be required to meet the mandatory energy requirements of CALGreen (Title 24, Part 11 of the CCR) and the Energy Code (Title 24, Part 6 of the CCR) in effect at the time of development and would benefit from the efficiencies associated with these regulations as they relate to building heating, ventilating, and air conditioning mechanical systems; water heating systems; and lighting. Adherence to the mandatory energy requirements and regulations would help to meet targeted energy goals and would also support the goals of the CAP regarding renewable energy and energy efficiency.

Future site-specific discretionary development would also be reviewed for consistency with the land use and policy framework in the College Area CPU which supports the development of a sustainable and efficient land use pattern and mobility system, encourages sustainable design that is energy efficient, and promotes renewable energy use. Examples of College Area CPU policies related to energy resources include Policy 4.53 which calls for exploring opportunities to integrate renewable energy technologies, such as small-scale wind turbines or photovoltaic panels, to reduce reliance on nonrenewable energy sources; Policy 7.1 which calls for promoting and facilitating the siting of new on-site photovoltaic energy generation and energy storage systems; and Policy 7.2 which calls for encouraging development and building retrofits to incorporate energy- and water-efficient building

systems, components, and practices. As such, the College Area CPU would not conflict with any state or local plan for renewable energy or energy efficiency, and impacts would be less than significant. Therefore, the proposed project is consistent with the impact conclusions identified in the Blueprint SD PEIR for conflicts with energy plans or policies, and would not result in new significant impacts or a substantial increase in the severity of previously identified impacts.

V.5.3 Conclusion

Based on the foregoing analysis and information, there is no evidence that the College Area CPU would require a major change to the Blueprint SD PEIR relative to energy. The Blueprint SD PEIR concluded that energy impacts were less than significant and no mitigation was required. Likewise, the project would not result in the wasteful, inefficient, or unnecessary use of energy resources and would not conflict or obstruct a state or local plan for renewable energy or energy efficiency. The College Area CPU would not result in any new significant energy impacts, nor would it result in a substantial increase in the severity of energy impacts from those described in the Blueprint SD PEIR.

V.6 Geology and Soils

V.6.1 Geologic Hazards

Blueprint SD PEIR

Geology and soils impacts related to geologic hazards are evaluated in Section 4.6.4 (Issue 1) of the Blueprint SD PEIR.

The Blueprint SD PEIR concluded that implementation of the Blueprint SD Initiative, Hillcrest FPA, and University CPU would not have direct or indirect significant environmental impacts to seismic hazards because future development would be required to comply with the SDMC and California Building Code (CBC). This regulatory framework includes a requirement for site-specific geotechnical investigations to identify potential geologic hazards or concerns that would need to be addressed during grading and/or construction of a specific development project. The Blueprint SD PEIR determined that adherence to SDMC grading regulations and construction requirements and implementation of recommendations contained within required subsequent future site-specific geotechnical studies would avoid significant impacts related to geologic hazards. Thus, the Blueprint SD PEIR concluded direct and cumulative impacts to geological hazards would be less than significant.

College Area CPU

Based on the City's Seismic Safety Study (City 2008), almost all of the College Area CPU area is located within Geologic Hazard Category 53, which is defined as "level or sloping terrain," with unfavorable geologic structure with a low to moderate risk. A small area in the northeastern portion of the CPU area, generally east of College Avenue and south of I-8, is within Category 32, which is assigned a low potential for liquefaction, and Category 52, which applies to other level areas with a low risk. In addition, a fault zone is located in the western portion of the College Area CPU area that generally extends in a north – south alignment, just west of Collwood Boulevard. This fault is

classified as Category 12, which includes faults that are potentially active, inactive, presumed inactive, or unknown.

Future site-specific development associated with the implementation of the College Area CPU could result in the exposure of people, structures, and infrastructure to seismic hazards. As discussed above, the College Area CPU area is characterized by a low to moderate geologic hazards risk based on City's Seismic Safety Study. While no earthquake fault zones are identified within the College Area CPU area on the Alquist-Priolo Fault Zoning Map (California Department of Conservation [CDC] 2024), the Seismic Safety Study identifies a fault in the western portion of the CPU area, as described above. Regardless, the College Area CPU area is subject to potential ground shaking caused by activity along faults in the region and as such, could be subject to potential geologic hazards such as earthquakes, landslides, mudslides, ground failure, or similar hazards. These geologic hazards could expose residences, occupants, visitors, and structures, among others, to substantial adverse effects, including the risk of loss, injury, or death.

Individual future development projects under the College Area CPU would be required to comply with the regulatory framework of the SDMC and CBC, which would include the preparation of a site-specific geotechnical investigation, adherence to the SDMC grading regulations and construction requirements, and implementation of recommendations contained within required site-specific geotechnical studies. The City's Building Regulations include regulations for structural design intended to reduce the impact of earthquake shaking on buildings to an acceptable level of risk. The seismic design of future projects within the College Area CPU area would be evaluated in accordance with the CBC and City standards to ensure a reduced risk to future structures from strong seismic ground shaking. Additionally, SDMC Section 145.1803(a)(2) states that no building permit shall be issued for construction where the geotechnical investigation report establishes that the construction of buildings or structures would be unsafe because of geologic hazards.

All new development and redevelopment within the College Area CPU area would be required to comply with the SDMC and the CBC, which include design criteria for seismic loading and other geologic hazards and require that a geotechnical investigation be conducted for all new structures, additions to existing structures, or whenever the occupancy classification of a building changes to a higher relative hazard category (SDMC Section 145.1803). Additionally, future discretionary development projects would be reviewed for consistency with the seismic safety policies contained in the Public Facilities, Services & Safety Element of the College Area CPU. These policies include, but are not limited to, Policy 8.33 which calls for incorporating public space parks and landscaped areas where active faults preclude the construction of new buildings where feasible, and Policy 8.34 which calls for working to maintain and improve the seismic resilience of structures, with consideration of preserving historical and unique structures. Thus, while future site-specific development projects within the College Area CPU area could be subject to seismic events and potential hazards associated with earthquakes, landslides, mudslides, ground failure, or similar hazards, these potential impacts would be reduced to a less than significant level through regulatory compliance with the seismic requirements in the CBC, SDMC, and with implementation of project level site-specific geotechnical report recommendations associated with future development. Project impacts related to geologic hazards would be less than significant. Therefore, the proposed project is consistent with the impact conclusions identified in the Blueprint SD PEIR for geologic hazards, and would not result in new significant impacts or a substantial increase in the severity of previously identified impacts.

V.6.2 Soil Erosion

Blueprint SD PEIR

Geology and soils impacts related to soil erosion are evaluated in Section 4.6.4 (Issue 2) of the Blueprint SD PEIR.

The Blueprint SD PEIR concluded that implementation of the Blueprint SD Initiative, Hillcrest FPA, and University CPU would result in less than significant impacts related to soil erosion and loss of topsoil. SDMC regulations prohibit sediment and pollutants from leaving worksites and require the property owner to implement and maintain temporary and permanent erosion, sedimentation, and water pollution control measures for individual development projects. The Blueprint SD PEIR determined that conformance to mandated City grading requirements would ensure that proposed grading and construction operations associated with future developed pursuant to the Blueprint SD Initiative, Hillcrest FPA, and University CPU would avoid significant soil erosion impacts. Thus, the Blueprint SD PEIR concluded that direct and cumulative soil erosion impacts would be less than significant.

College Area CPU

During future site-specific construction and operations associated with future development within the College Area CPU area, some soil erosion could occur if soil is left exposed to the elements without proper protection. Individual development projects under the College Area CPU would be required to comply with applicable SDMC regulations related to erosion control and prevention. SDMC Section 142.0146 requires grading work to incorporate erosion and siltation control measures in accordance with SDMC Chapter 14, Article 2, Division 4 (Landscape Regulations) and the standards established in the Land Development Manual. These regulations prohibit sediment and pollutants from leaving the worksite and require the property owner to implement and maintain temporary and permanent erosion, sedimentation, and water pollution control measures. Controls include measures outlined in SDMC Chapter 14, Article 2, Division 2 (Runoff Control and Drainage Regulations) that address the development's potential erosion and sedimentation impacts.

Compliance with these mandated City grading requirements would ensure that future proposed grading and construction operations would avoid significant soil erosion impacts. Furthermore, future development involving clearing, grading, or excavation that causes soil disturbance of one or more acres, or any project involving less than one acre that is part of a larger development plan, is subject to the National Pollutant Discharge Elimination System (NPDES) Construction Stormwater General Permit provisions. Additionally, ground disturbance of a certain size would trigger the preparation of and compliance with an approved Storm Water Pollution Prevention Plan that would consider the full range of sediment and erosion control Best Management Practices (BMPs), including additional site-specific conditions. Subsequent project compliance with NPDES requirements would reduce the potential for substantial soil erosion from new development associated with the project. Impacts related to soil erosion would be less than significant. Therefore, the proposed project is consistent with the impact conclusions identified in the Blueprint SD PEIR for soil erosion, and would not result in new significant impacts or a substantial increase in the severity of previously identified impacts.

V.6.3 Geologic Instability

Blueprint SD PEIR

Geology and soils impacts related to geologic instability are evaluated in Section 4.6.4 (Issue 3) of the Blueprint SD PEIR.

The Blueprint SD PEIR concluded that future development within the Blueprint SD Initiative, Hillcrest FPA, and University CPU areas would be required to be constructed in accordance with the SDMC and CBC and would be required to prepare a site-specific geotechnical report and implement recommendations within the report. Therefore, the Blueprint SD PEIR concluded that direct and cumulative impacts related to geologic instability and specifically landslides, lateral spreading, subsidence, liquefaction, or collapsible or expansive soils would be less than significant.

College Area CPU

There are no mapped areas within the College Area CPU area on the City's Seismic Safety Study that are susceptible to landslides or have slide-prone formations (City 2008). Most of the College Area CPU area is mapped as Geologic Hazard Category 53, characterized as low to moderate risk, and a small area in the northeastern portion of the CPU area just south of I-8 is mapped as Category 52 with low risk. Additionally, a small area just south of the Category 52-mapped area is mapped as Category 32, which is identified as a low liquefaction potential area associated with fluctuating groundwater and minor drainages.

Future site-specific development projects within the College Area CPU area would be constructed in compliance with applicable regulations in the SDMC and CBC and additionally would be required to implement the recommendations within a site-specific geotechnical report that assesses site-specific risks and hazards. Potential geologic instability hazards associated with landslides, lateral spreading, subsidence, liquefaction, or collapsible or expansive soils would be avoided through implementation of site-specific recommendations contained in a geotechnical report investigation as required by the CBC and SDMC. Impacts related to geologic instability would be less than significant. Therefore, the proposed project is consistent with the impact conclusions identified in the Blueprint SD PEIR for geologic instability, and would not result in new significant impacts or a substantial increase in the severity of previously identified impacts.

V.6.4 Paleontological Resources or Unique Geologic Features

Blueprint SD PEIR

Geology and soils impacts related to paleontological resources or unique geologic features are evaluated in Section 4.6.4 (Issue 4) of the Blueprint SD PEIR.

The Blueprint SD PEIR concluded that compliance with SDMC Section 142.0151 would ensure paleontological monitoring is required during grading in accordance with the General Grading Guidelines for Paleontological Resources in the City's Land Development Manual. The Blueprint SD PEIR concluded that with implementation of these SDMC requirements during grading, direct and

cumulative impacts to paleontological resources and unique geologic features would be less than significant.

College Area CPU

Future development within the College Area CPU area could be located in areas containing paleontological resources and unique geologic features. Grading into geologic formations with a moderate or high paleontological resource potential could destroy paleontological resources and the scientific information available from the recovery of such resources. Similarly, unique geologic features could be adversely affected if destroyed due to site development.

Grading associated with future development within the College Area CPU area involving excavation that exceeds the criteria identified in SDMC Section 142.0151 (i.e., grading in excess of 1,000 cubic yards and extending to a depth of 10 feet or greater into high sensitivity formations, or grading in excess of 2,000 cubic yards and extending to a depth of 10 feet or greater into moderate sensitivity formations) could potentially expose undisturbed formations and associated fossil remains. These development projects could destroy paleontological resources if the fossil remains are not recovered and salvaged. In addition, future projects proposing shallow grading where formations are exposed and where fossil localities have already been identified could also result in a significant impact. Based on the location of the College Area CPU area and the concentration of future development within existing urban areas that have been subjected to prior grading for development, much of the CPU area is likely to be underlain by artificial fill with no potential to uncover paleontological resources. However, some areas may have high and/or moderate resource sensitivity where fossils could be uncovered during future construction-related activities. Pursuant to SDMC Section 142.0151, paleontological monitoring would be required in accordance with the General Grading Guidelines for Paleontological Resources in the Land Development Manual for any of the following:

- Grading that involves 1,000 cubic yards or greater, and 10 feet or greater in depth, in a High Resource Potential Geologic Deposit/Formation/Rock Unit; or
- Grading that involves 2,000 cubic yards or greater, and 10 feet or greater in depth, in a Moderate Resource Potential Geologic Deposit/Formation/Rock Unit; or
- Grading on a fossil recovery site or within 100 feet of the mapped location of a fossil recovery site.

If paleontological resources are discovered during grading, the SDMC requires that grading in the area of discovery cease until a qualified paleontological monitor has observed the discovery, and the discovery has been recovered in accordance with the General Grading Guidelines for Paleontological Resources (contained within Appendix P of the Land Development Manual). These guidelines require the placement of a standard monitoring requirement on all grading plans, as applicable, to ensure paleontological monitoring is implemented and defines the steps to be taken to ensure significant paleontological resources are recovered, recorded, and curated, in the event resources are encountered. Implementation of the City's Grading Regulations and General Grading Guidelines for Paleontological Resources, as required by the SDMC and applicable to all development, would ensure that impacts resulting from future construction-related activities within the College Area CPU area would be less than significant. Therefore, the proposed project is consistent with the impact conclusions identified in the Blueprint SD PEIR for paleontological resources or unique geologic

features, and would not result in new significant impacts or a substantial increase in the severity of previously identified impacts.

V.6.5 Conclusion

Based on the foregoing analysis and information, there is no evidence that the College Area CPU would require a major change to the Blueprint SD PEIR relative to geology and soils. The Blueprint SD PEIR concluded that geology and soils impacts were less than significant and no mitigation was required. Likewise, the project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault; strong seismic ground shaking; seismic-related ground failure including liquefaction; or landslides. The project also would not result in substantial soil erosion or be located on a geologic unit or soil that is unstable. Additionally, project impacts to paleontological resources or unique geologic features would be avoided through regulatory compliance. The College Area CPU would not result in any new significant impacts to geology and soils, nor would it result in a substantial increase in the severity of impacts to geology and soils from those described in the Blueprint SD PEIR.

V.7 Greenhouse Gases

V.7.1 Greenhouse Gas Emissions

Blueprint SD PEIR

Impacts related to GHGs are evaluated in Section 4.7.4 (Issue 1) of the Blueprint SD PEIR.

The Blueprint SD PEIR stated that quantification of GHG emissions is not required for the Blueprint SD Initiative, Hillcrest FPA, and University CPU based on the City's CEQA Significance Determination Thresholds (City 2022b). Pursuant to the City Planning Department's *Revised Climate Action Plan Consistency for Plan- and Policy-Level Environmental Documents and Public Infrastructure Projects* memorandum (City 2025a), the environmental analysis for plan and policy-level documents should address the ways in which the plan or policy is consistent with the goals and policies of the General Plan and CAP, specifically General Plan policies LU-A.9, ME-D.17, CE-J.2, and CE-J.3 and CAP Strategy 3, although all six strategies from the CAP should be discussed. The Blueprint SD PEIR determined that the Blueprint SD Initiative, Hillcrest FPA, and University CPU were consistent with these General Plan policies and the CAP (see below in Section V.7.2, *Conflicts with Plans and Policies*) and concluded that impacts (GHG analysis is cumulative by nature) related to GHG emissions would be less than significant.

College Area CPU

The College Area CPU is a plan and policy-level document; therefore, quantification of GHG emissions is not required based on the City's CEQA Significance Determination Thresholds (City 2022b) and the *Revised Climate Action Plan Consistency for Plan- and Policy-Level Environmental Documents and Public Infrastructure Projects* memorandum (City 2025a) as the project is consistent with General Plan policies LU-A.9, ME-D.17, CE-J.2, and CE-J.3 and the six strategies of the CAP, as

well as applicable plans, policies, and regulations adopted for the purpose of reducing GHG emissions (see Section V.7.2, below).

Pursuant to CEQA Guidelines Section 15183.5, the City's CAP is a qualified plan for the reduction of GHG emissions for use in cumulative impact analysis pertaining to development projects. Pursuant to CEQA Guidelines Sections 15064(h)(3), 15130(d), and 15183(b), a project's incremental contribution to a cumulative GHG emissions effect may be determined not to be cumulatively considerable if it complies with the requirements of the CAP. Future discretionary projects in the College Area CPU area would be required to undergo a project-level environmental review to ensure the project is consistent with applicable plans and policies as detailed in the City's CEQA Significance Determination Thresholds (City 2022b) and the *Revised Climate Action Plan Consistency for Plan- and Policy-Level Environmental Documents and Public Infrastructure Projects* memorandum (City 2025a). Additionally, future ministerial and discretionary projects implemented under the College Area CPU would be required to comply with the City's CAP Consistency Regulations (SDMC Chapter 14, Article 3, Division 14), as applicable.

It should be noted that the City's CAP quantified existing GHG emissions as well as projected emissions for the years 2030 and 2035 resulting from activities within the City's jurisdiction in order to identify the City's target emissions levels and provide specific actions and strategies to meet these targets. GHG emissions from construction activities were included in the CAP GHG inventory (Off-Road Transportation emissions, i.e., construction vehicle emissions, were used as the proxy for capturing this category of emissions) and business-as-usual projections and were based on the methods and models used by the California Air Resources Board (CARB) in the statewide GHG emissions inventory as described in Appendix B, *Methods for Estimating Greenhouse Gas Emissions and Emissions Reductions in the San Diego Climate Action Plan*, of the CAP. As a plan-level document, the College Area CPU would increase development capacity within the CPU area; however, it is not anticipated to result in GHG emissions that are inconsistent with the construction emissions projections used in the CAP as land use was not a factor in determining existing or future construction emissions in the CAP GHG Inventory. Furthermore, California regulations limit construction equipment and vehicle idling, construction best management practices promote energy efficiency and, generally, construction is short-term in nature. Therefore, construction emissions from the implementation of College Area CPU are not anticipated to constitute a large source of GHG emissions.

The College Area CPU would support the City in obtaining citywide GHG emissions reduction targets under the CAP. Impacts related to GHG emissions would be less than significant. Therefore, the proposed project is consistent with the impact conclusions identified in the Blueprint SD PEIR for GHG emissions, and would not result in new significant impacts or a substantial increase in the severity of previously identified impacts.

V.7.2 Conflicts with Plans or Policies

Blueprint SD PEIR

GHG impacts related to conflicts with plans or policies are evaluated in Section 4.7.4 (Issue 2) of the Blueprint SD PEIR.

The Blueprint SD PEIR concluded that future development under the Blueprint SD Initiative, Hillcrest FPA, and University CPU would be consistent with state plans (CARB Scoping Plan and associated regulations), SANDAG's 2021 Regional Plan, the City's General Plan, and the City's CAP. Impacts associated with applicable GHG emissions reduction plans were assessed to be less than significant.

College Area CPU

As discussed below, future development under the project would be consistent with state plans, SANDAG's 2021 Regional Plan, the City's General Plan, and the City's CAP. Furthermore, individual development projects implemented under the College Area CPU would be required to comply with the City's CAP Consistency Regulations per SDMC Chapter 14, Article 3, Section 14. These regulations apply to specific types of ministerial and discretionary projects as set forth in SDMC Section 143.1403. Future discretionary projects would also be required to undergo project-level environmental review to ensure projects are consistent with applicable plans and policies. Impacts related to GHG emissions would be less than significant. Therefore, the proposed project is consistent with the impact conclusions identified in the Blueprint SD PEIR for conflicts with plans or policies, and would not result in new significant impacts or a substantial increase in the severity of previously identified impacts.

CARB's Scoping Plan

CARB's Scoping Plan provides a framework for actions to reduce California's GHG emissions and requires CARB and other state agencies to adopt regulations and other initiatives to reduce GHGs. Implementation of the College Area CPU would comply with applicable regulations adopted in furtherance of the Scoping Plan because future site-specific individual development projects implemented under the College Area CPU are required to comply with the CBC's energy efficiency and applicable green building standards. Additionally, future site-specific development would be reviewed at project intake to ensure the inclusion of applicable energy efficiency and green building requirements of the applicable building and energy codes. Compliance with applicable building code requirements would ensure that future projects implemented under the College Area CPU are consistent with state plans, including the 2008, 2017, and 2022 Scoping Plans.

SANDAG's San Diego Forward: The 2021 Regional Plan

The Village Climate Goal Propensity Map developed under the Blueprint SD Initiative was developed based on modeling that assumes full implementation of SANDAG's 2021 Regional Plan transportation network. By planning for growth in areas of existing and future planned transportation infrastructure, the Blueprint SD Initiative would support implementation of SANDAG's 2021 Regional Plan by focusing high-density residential development near existing and planned transit. The College Area CPU includes a land use plan and community-specific policies which build on the General Plan's land use and policy framework. The College Area CPU is consistent with SANDAG's 2021 Regional Plan goals and land use strategies as it supports high-density residential and mixed-use village development along transit corridors within villages and nodes and adjacent to SDSU and also incorporates SANDAG's mobility improvements. The Village Climate Goal Propensity Map (Figure LU-1 in the General Plan Land Use and Community Planning Element; City 2024a) shows that the College Area CPU area contains areas of medium to high village propensity values in the center of the community near SDSU and along the El Cajon Boulevard corridor. As outlined in the

College Area CPU Land Use Element and consistent with the Village Climate Goal Propensity Map, development intensity would be increased near SDSU; along El Cajon Boulevard, Montezuma Road, College Avenue; and in proximity to existing and planned transit stops throughout the College Area CPU area. By placing housing and jobs near transit, the College Area CPU would maximize regional investments in transit by making it easier for more residents and visitors to use public transportation and other forms of alternative transportation, which in turn decreases VMT and associated GHG emissions. Therefore, implementation of the College Area CPU would result in future development that would be consistent with SANDAG's 2021 Regional Plan.

City of San Diego General Plan

The College Area CPU is part of the General Plan, and together they provide the framework for development in the College Area community. The College Area CPU provides community-specific policies which build on the General Plan's policies. As required by the City's CEQA Significance Determination Thresholds (City 2022b), plan- and policy-level documents should be evaluated against General Plan Policies LU-A.9, ME-D.17, CE-J.2, and CE-J.3. A brief consistency analysis is provided below in Table 5, *College Area CPU General Plan GHG Policy Consistency Analysis*. As shown in the table, the project would be consistent with these policies.

Table 5
COLLEGE AREA CPU GENERAL PLAN GHG POLICY CONSISTENCY ANALYSIS

General Plan Policy	Consistency Analysis
LU-A.9: Determine the appropriate mix and densities/intensities of village land uses at the community plan level, or at the project level when adequate direction is not provided in the community plan.	Consistent. The College Area CPU includes updates to the land use plan for the College Area CPU area to help achieve the desired vision and objectives for the community. As shown in Figure 4, Proposed Land Use (see also Figure 2-5, Land Use Map, of the College Area CPU), higher density land uses are proposed near SDSU and along transit corridors including El Cajon Boulevard, Montezuma Road, Alvarado Road, and College Avenue. Consistent with the General Plan's Village Climate Goal Propensity Map, the designation of higher density residential, mixed-use and commercial villages along transit corridors and near transit facilities is intended to support opportunities for transit-oriented development and encourage the use of alternative transportation such as walking/rolling, biking and riding transit.
ME-D.17: Make transit planning an integral component of long-range planning documents and the development review process.	Consistent. The College Area CPU designates higher density mixed-use and residential land uses along transit corridors and within nodes and villages that support opportunities for transit-oriented development. As indicated in Figure 4, Proposed Land Use Map (see also Figure 2-5, Land Use Map, of the College Area CPU), higher density development would be focused near the SDSU

Table 5
COLLEGE AREA CPU GENERAL PLAN GHG POLICY CONSISTENCY ANALYSIS

General Plan Policy	Consistency Analysis
	Transit Center Trolley Station and the UC San Diego Health East Trolley Station, as well as along major roadways served by bus routes (e.g., El Cajon Boulevard, College Avenue, and Montezuma Road). The College Area CPU also proposes the reconfiguration of El Cajon Boulevard and College Avenue to accommodate transit-only lanes.
CE-J.2: Include community street tree master plans in community plans.	Consistent. The College Area CPU includes an updated Street Tree Master Plan and associated policies (see Policies 4.4, 4.23, 4.38, 4.39, 4.40, 4.43, 8.2, and 8.39).
CE-J.3: Develop community plan street tree master plans during community plan updates in an effort to create a comprehensive citywide urban forest master plan.	Consistent. The College Area CPU includes an updated Street Tree Master Plan.

City of San Diego Climate Action Plan

The CAP establishes six primary strategies for achieving the citywide goals of the plan. An analysis of the College Area CPU's consistency with the six strategies of the CAP is provided below.

Strategy 1 Decarbonizing of the Built Environment

Strategy 1 includes goals, actions, and targets with the aim of removing carbon from the City's energy system and transitioning buildings to cleaner, zero emissions sources or technologies. Consistent with Strategy 1, the proposed CPU includes policies which address the decarbonization of the built environment, and includes a guiding principle which encourages the development of "A resilient and healthy community powered by renewable energy and an emissions-free transportation system." For example, Policy 4.53 calls for exploring opportunities to integrate renewable energy technologies, such as small-scale wind turbines or photovoltaic panels, to reduce reliance on non-renewable energy sources. The Open Space and Conservation Element of the College Area CPU also identifies policies which promote sustainable development and encourage the transition of buildings to cleaner energy sources, such as Policy 7.2 which encourages development and building retrofits to incorporate energy- and water-efficient building systems, components, and practices; and Policy 7.3 which encourages the utilization of sustainable design that reduces greenhouse gas emissions, pollution, and dependency on non-renewable energy sources, makes efficient use of local resources, and incorporates sustainable landscaping, water use, and stormwater management. Future discretionary projects within the College Area CPU area would be reviewed for consistency with these policies to ensure the projects do not conflict with the CAP. Furthermore, new construction and redevelopment that would occur under the project would be required to comply with the applicable energy efficiency and green building requirements of the applicable building and energy codes and guidelines such as the current CALGreen water

conservation requirements and the City Public Utilities Department's Capital Improvement Program Guidelines and Standards. As such, the College Area CPU would be consistent with CAP Strategy 1.

Strategy 2 Access to Clean and Renewable Energy

Strategy 2 provides measures to transition the City's energy system away from fossil fuels and toward clean and renewable sources. Consistent with Strategy 2, the College Area CPU identifies policies which encourage the use of clean and renewable energy sources, such as Policy 4.53 which calls for exploring opportunities to integrate renewable energy technologies, such as small-scale wind turbines or photovoltaic panels, to reduce reliance on nonrenewable energy sources; and Policy 7.1 which calls for promoting and facilitating the siting of new on-site photovoltaic energy generation and energy storage systems. Additionally, and as stated above, the CPU includes a guiding principles which encourages the development of "A resilient and healthy community powered by renewable energy and an emissions-free transportation system." Future discretionary projects within the College Area CPU area would be reviewed for consistency with these policies to ensure the projects do not conflict with the CAP. Accordingly, the College Area CPU would be consistent with CAP Strategy 2.

Strategy 3 Mobility and Land Use

Strategy 3 focuses on land use and planning to enhance mobility options and reduce automobile use and associated GHG emissions. Strategy 3 identifies measures and actions which call for bicycle and pedestrian improvements; increased safe, convenient, and enjoyable transit use; telecommuting; reducing traffic congestion; and encouraging climate-focused land use. The College Area CPU supports a multimodal strategy through improvements to the mobility network that increase bicycle, pedestrian, and transit access as well as through policies identified in the Mobility Element (see Policies 3.1 through 3.17). The College Area CPU also proposes a land use plan which focuses higher density mixed-use and residential land uses near transit facilities and along transit corridors and within nodes and villages that support opportunities for transit-oriented development and encourage the use of alternative modes of transportation such as walking/rolling, biking and riding transit (see Figure 4, Proposed Land Use). Furthermore, future discretionary projects within the College Area CPU area would be reviewed for consistency with these policies to ensure the projects do not conflict with the CAP. As such, the College Area CPU would be consistent with CAP Strategy 3.

Strategy 4 Circular Economy and Clean Communities

Strategy 4 aims to divert solid waste and capture landfill methane gas emissions. Future development in the College Area CPU area would be required to comply with the City's Construction and Demolition Debris Diversion Ordinance (SDMC Chapter 6, Article 6, Division 6), as applicable. The proposed CPU also includes Policy 8.38 which encourages the provision of public trash and recycling receptacles along transit corridors, villages and nodes where feasible. Accordingly, the College Area CPU would be consistent with CAP Strategy 4.

Strategy 5 Resilient Infrastructure and Healthy Ecosystems

Strategy 5 calls for new actions related to both the natural and built environments in the City to better prepare for the impacts of climate change and minimize its negative effects. The proposed CPU's policies which address the development of resilient infrastructure and the preservation of healthy ecosystems include, but are not limited to, Policy 4.37 which encourages the design of street improvements that include stormwater infiltration measures that reduce stormwater runoff and flooding where warranted feasible; Policy 4.43 which calls for planting native and/or climate appropriate landscaping and trees; Policy 4.54 which calls for supporting sustainable landscaping practices by using drought-tolerant, climate-appropriate plantings and materials, as well as light-colored paving to minimize heat retention; and Policy 7.5 which promotes open space conservation and restoration of natural lands on lands designated as open space, including lands within the MHPA. Future discretionary projects within the College Area CPU area would be reviewed for consistency with these policies to ensure the projects do not conflict with the CAP. Additionally, future applicable development consistent with the College Area CPU would be required to adhere to the Resilient Infrastructure and Healthy Ecosystems Regulations (SDMC Section 143.1415), which 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. As such, the College Area CPU would be consistent with CAP Strategy 5.

Strategy 6 Emerging Climate Actions

Strategy 6 sets forth additional measures to reduce citywide emissions to reach the CAP's net zero goal and focuses on developing more effective partnerships with regional partners such as the Port of San Diego, SANDAG, and the County of San Diego; collaborating on research and projects with the private sector; advancing energy resilience; furthering research on carbon sequestration opportunities; and developing pilot projects that use new techniques and technologies from all sectors. As described above, the College Area CPU includes various policies and goals to reduce the dependency on non-renewable energy sources and reduce emissions by incorporating transportation demand management strategies.

As future development is implemented under the College Area CPU, the application of the City's CAP consistency regulations in addition to compliance with state regulations aimed at reducing GHG emissions would help minimize potential GHG emissions. Furthermore, future discretionary projects within the College Area CPU area would be reviewed for consistency with the CPU's policies to ensure the projects do not conflict with the CAP. Thus, the College Area CPU would be consistent with CAP Strategy 6.

V.7.3 Conclusion

Based on the foregoing analysis and information, there is no evidence that the College Area CPU would require a major change to the Blueprint SD PEIR relative to GHG emissions. The Blueprint SD PEIR concluded that GHG impacts were less than significant based on consistency with applicable General Plan policies and CAP strategies at a program level, and no mitigation was required. Likewise, the project, at the program level, would be consistent with applicable General Plan policies and CAP strategies. The College Area CPU would not result in any new significant GHG impacts, nor would it result in a substantial increase in the severity of GHG impacts from those described in the Blueprint SD PEIR.

V.8 Hazards and Hazardous Materials

V.8.1 Hazardous Materials

Blueprint SD PEIR

Impacts related to hazardous materials are evaluated in Section 4.8.4 (Issue 1) of the Blueprint SD PEIR.

The Blueprint SD PEIR concluded that future development and construction activities associated with individual development implemented by the Blueprint SD Initiative, Hillcrest FPA, and University CPU would be in compliance with applicable federal, state, and local regulations and would ensure that regulated hazardous materials are handled and disposed of properly. Operation of future development could use small amounts of hazardous materials for cleaning and maintenance; however, hazardous materials and waste would be managed and used in accordance with applicable federal, state, and local laws and regulations, which would ensure that no hazards would result during long-term operations. The Blueprint SD PEIR concluded that direct and cumulative hazardous materials impacts would be less than significant.

College Area CPU

Future site-specific development that could occur in accordance with the College Area CPU may involve the routine use, transport, or disposal of common hazardous materials. Additionally, future grading and project construction may require the use of hazardous materials (e.g., fuels, lubricants, solvents, etc.), which would require proper storage, handling, use, and disposal. At the time future projects are proposed, the use of hazardous materials and the potential for hazards to occur associated with routine transport, use, or disposal would be evaluated, and future projects would be required to comply with applicable federal, state, and local regulations which require adherence to specific guidelines regarding the use, transportation, disposal, and accidental release of hazardous materials. Thus, the College Area CPU would not create a significant hazard to the public or environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, and impacts would be less than significant. Therefore, the proposed project is consistent with the impact conclusions identified in the Blueprint SD PEIR for hazardous materials, and would not result in new significant impacts or a substantial increase in the severity of previously identified impacts.

V.8.2 Hazards Near a School

Blueprint SD PEIR

Impacts related to hazards near schools are evaluated in Section 4.8.4 (Issue 3) of the Blueprint SD PEIR.

The Blueprint SD PEIR determined that implementation of the Blueprint SD Initiative, Hillcrest FPA, and University CPU would not increase the likelihood that hazardous emissions or the handling of

hazardous or acutely hazardous materials, substances, or waste would occur near schools compared to baseline conditions. Future development implemented in accordance with the Blueprint SD Initiative, Hillcrest FPA, and University CPU would be subject to applicable regulations and industry and code standards and requirements related to hazardous emissions and the handling of hazardous materials, including as they relate to proximity to schools. For new schools that could be constructed within 0.25 mile of a facility that emits hazardous emissions or handles hazardous or acutely hazardous materials, substances, or waste, the school district or private school entities would be responsible for planning, siting, building, and operating the schools. It would be the responsibility of the school district to perform an in-depth analysis of potential hazards at the project level. Additionally, pursuant to PRC Section 21151.4, an EIR shall not be certified nor shall a Negative Declaration be approved for any project involving the construction or alteration of a facility that emits hazardous emissions or handles extremely hazardous substances within a quarter mile of a school unless the lead agency has consulted with the school district having jurisdiction over the school, and the school district has been given written notification of the project at least 30 days prior to the proposed certification of the EIR or approval of the Negative Declaration. The Blueprint SD PEIR concluded direct and cumulative impacts to schools from hazardous materials or handling hazardous or acutely hazardous materials, substances, or waste would be less than significant, and would not result in new significant impacts or a substantial increase in the severity of previously identified impacts.

College Area CPU

Future site-specific development that is anticipated to occur in accordance with the College Area CPU could be located within proximity to schools. There are ten existing public and private schools, numerous day care facilities, and SDSU within the College Area CPU area. Future site-specific development consistent with the project could also result in the development of additional schools within the community.

While it is possible that future development activities under the project could emit hazardous emissions and/or use or transport hazardous materials within 0.25 mile of an existing or future school, the project would not increase the likelihood that these activities will occur compared to baseline conditions as the proposed CPU is a planning initiative that anticipates future development; however, no specific development is proposed at this time. Future development would be required to comply with applicable federal, state, and local regulations and industry and code standards related to hazardous emissions and the transport and handling of hazardous materials, including discretionary approval from the County of San Diego Department of Environmental Health and Quality, Hazardous Materials Division (DEHQ/HMD) for all covered projects that are undertaken consistent with the project. In accordance with City, state, and federal requirements, any new development on contaminated property would necessitate the cleanup and/or remediation of the property in accordance with applicable requirements and regulations. No construction would be permitted to occur at such locations until a “no further action” clearance letter is issued by the County DEHQ/HMD as the local Certified Unified Program Agency (CUPA), or a similar determination is issued by the City’s Fire-Rescue Department (SDFD), California Department of Toxic Substances Control (DTSC), RWQCB, or other responsible agency. Documentation of such clearance would be provided on a project-by-project basis as part of the project-specific CEQA and/or building permit reviews and would be a requirement for all future project approvals. Through implementation of the existing regulatory framework, potential impacts to schools due to proximity to hazardous

emissions, materials, substances, or waste would be less than significant. Therefore, the proposed project is consistent with the impact conclusions identified in the Blueprint SD PEIR for hazards near a school, and would not result in new significant impacts or a substantial increase in the severity of previously identified impacts.

V.8.3 Hazardous Material Sites

Blueprint SD PEIR

Impacts related to hazardous material sites are evaluated in Section 4.8.4 (Issues 2 and 4) of the Blueprint SD PEIR.

The Blueprint SD PEIR noted that there are listed hazardous materials sites within the Blueprint SD Initiative, Hillcrest FPA, and University CPU areas, some of which have an “open case” status. Some properties may need to be individually evaluated at the time of redevelopment and may need remedial measures to mitigate potential exposure to hazardous materials present at those properties. The Blueprint SD PEIR determined that any new development that involves contaminated property would necessitate the cleanup and/or remediation of the property in accordance with applicable requirements and regulations. No construction would be permitted to occur at a contaminated site until a “no further action” clearance letter from the County’s DEHQ/HMD, or a similar determination is issued by the SDFD, DTSC, RWQCB, or other responsible agency. Therefore, the Blueprint SD PEIR concluded direct and cumulative impacts related to hazardous materials sites would be less than significant.

College Area CPU

Based on a review of the State Water Resources Control Board GeoTracker (SWRCB 2025) and the DTSC EnviroStor (DTSC 2025) databases, there are 32 identified hazardous materials sites in the College Area CPU area, five of which have an “open case” or “evaluation” status. These five “open case” or “evaluation” status sites are located primarily along El Cajon Boulevard. Future development in accordance with the project could convert existing sites with a history of hazardous materials use to new uses that would likely accommodate a higher density of people and sensitive receptors. Redevelopment of listed hazardous materials sites could release hazardous materials into the environment and result in both short- and long-term exposure to workers, residents, and visitors. Based on the locations of these listed sites, future development in accordance with the project could potentially expose people or sensitive receptors to hazardous materials.

Future development and redevelopment activities implemented under the College Area CPU would be required to adhere to applicable federal, state, and local regulations and industry and code standards related to health hazards from hazardous materials. New development within the College Area CPU area that involves contaminated property would necessitate the cleanup and/or remediation of the property in accordance with City, state, and federal requirements. No construction would be permitted to occur at such locations within the College Area CPU area until a “no further action” clearance letter is issued by the County DEHQ/HMD or a similar determination is issued by the SDFD, DTSC, RWQCB, or other responsible agency. Documentation of such clearance would be provided as part of the project-specific CEQA and/or building permit reviews for individual projects and would be a requirement for future project approvals. Although the College Area CPU

area may contain hazardous sites, compliance with existing regulations would reduce potential impacts to a less than significant level. Therefore, the proposed project is consistent with the impact conclusions identified in the Blueprint SD PEIR for hazardous material sites, and would not result in new significant impacts or a substantial increase in the severity of previously identified impacts.

V.8.4 Emergency Response

Blueprint SD PEIR

Hazardous materials impacts related to emergency response are evaluated in Section 4.8.4 (Issue 5) of the Blueprint SD PEIR.

The Blueprint SD PEIR concluded that the Blueprint SD Initiative, Hillcrest FPA, and University CPU do not include any goals or objectives that would interfere with or diminish the capacity of existing programs and facilities to provide effective emergency response or allow for sufficient emergency evacuation in these areas. The Blueprint SD Initiative, Hillcrest FPA, and University CPU include policies which support effective emergency evacuation and would also improve circulation and mobility in these areas for all modes of travel, including emergency vehicles, and dedicated roadway space for transit would also be available for emergency vehicle use. Additionally, the Blueprint SD PEIR determined future development under the Blueprint SD Initiative, Hillcrest FPA, and University CPU would be primarily located within areas near major transportation corridors that serve as emergency evacuation routes. The Blueprint SD PEIR concluded that direct and cumulative impacts related to emergency response would be less than significant.

College Area CPU

Implementation of the College Area CPU would result in an overall community-wide increase of approximately 25,950 additional planned residential units over existing conditions. The College Area CPU includes policies supporting emergency response and operational improvements, such as Policy 8.1, which calls for locating public facilities along transit corridors, villages and nodes to increase accessibility and efficiently deliver services; Policy 8.4, which encourages the provision of programming for hazard preparedness to mitigate risk from natural disaster within the community; Policy 8.16 which calls for continuing to support police services that serve the community as the community grows; Policy 8.19 which calls for considering siting a new fire station within the College Area at a location to be determined; including considering potential sites near San Diego State University, coordinating with San Diego State University on the potential to locate a future fire station on property owned by the University, and coordinate with San Diego State University on the potential to contribute to the funding of a new fire station; Policy 8.20 which calls for evaluating potential upgrades, expansions and new fire stations and equipment to maintain adequate service; and Policy 8.21, which supports maintaining and evaluating sufficient fire-rescue services to serve the College Area, particularly in areas adjacent to open space canyons and hillsides. Implementation of the College Area CPU's planned mobility network would also improve safety and mobility for pedestrians, cyclists, transit, and emergency response, including emergency vehicles throughout the College Area CPU area. For example, the College Area CPU proposes dedicated transit lanes on El Cajon Boulevard from 54th Street to Montezuma Road and along College Avenue from El Cajon Boulevard to Montezuma Road which can be used by emergency response vehicles. Additionally, Montezuma Road from College Avenue to El Cajon Boulevard is proposed to be converted to a two-

lane collector with two-way center left turn lane that can be utilized to facilitate emergency response when needed. The proposed CPU also includes policies which support improvements to the mobility network to facilitate emergency response such as, but not limited to, Policy 3.10 which supports the implementation of the planned street classifications as part of resurfacing and improvement projects; Policy 3.11 which supports the implementation of "Vision Zero" through traffic calming measures; Policy 3.14 which supports new mobility connections that enhance circulation, especially to subdivisions that have only one route of ingress and egress; and Policy 3.20 which supports the upgrade of traffic signals to facilitate traffic signal coordination, transit priority and adaptive coordination along corridors and adjacent to and serving San Diego State University to facilitate traffic management around the campus especially during special events.

The Emergency Operations Plan (County of San Diego 2022) identifies a broad range of potential hazards and a response plan for public protection, and also identifies major interstates and highways within San Diego County that could be used as primary routes for evacuation in the event of an emergency. Emergency access and emergency evacuation for the College Area CPU area would be provided by I-8, which is accessible via Fairmount Avenue, College Avenue, and Lake Murray Boulevard. Future development under the College Area CPU would be primarily located within areas proximate to major transportation corridors that serve as emergency evacuation routes. Implementation of the College Area CPU is not anticipated to impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan because the existing transportation network serving the community would remain accessible for emergency response and evacuations.

Furthermore, as stated above, the College Area CPU identifies proposed mobility improvements and a robust policy framework which would facilitate the development of a safe, efficient, and well-connected mobility network that would enable effective emergency response and evacuation. Additionally, the City's Office of Emergency Services oversees emergency preparedness and response services for disaster-related measures, including administration of the City's Emergency Operation Center (EOC); and maintains the EOC in a continued state of readiness, training City staff and outside agency representatives in their roles and responsibilities, and coordinating EOC operations when activated in response to an emergency or major event/incident. Thus, impacts would be less than significant. Therefore, the proposed project is consistent with the impact conclusions identified in the Blueprint SD PEIR for emergency response, and would not result in new significant impacts or a substantial increase in the severity of previously identified impacts.

V.8.5 Conclusion

Based on the foregoing analysis and information, there is no evidence that the College Area CPU would require a major change to the Blueprint SD PEIR relative to hazards and hazardous materials. The Blueprint SD PEIR concluded that impacts related to hazards and hazardous materials were less than significant through regulatory compliance, and no mitigation was required. Likewise, the project would not create a significant hazard to the public or environment (1) through the routine transport, use, or disposal of hazardous materials; (2) through reasonably foreseeable upset and accident conditions involving the release of hazardous materials; or (3) by emitting or handling hazardous materials within 0.25 mile of an existing or planned school based on regulatory compliance. Furthermore, the project would not impair implementation of, or physically interfere with, an adopted emergency response plan. Therefore, impacts related to hazards and hazardous

materials resulting from the project would be less than significant. The College Area CPU would not result in any new significant impact related to hazards and hazardous materials, nor would it result in a substantial increase in the severity of impacts related to hazards and hazardous materials from those described in the Blueprint SD PEIR.

V.9 Hydrology

V.9.1 Groundwater

Blueprint SD PEIR

Hydrology impacts related to groundwater are evaluated in Section 4.9.4 (Issue 1) of the Blueprint SD PEIR.

The Blueprint SD PEIR determined that new development occurring within the Blueprint SD Initiative, Hillcrest FPA, and University CPU areas would be required to implement on-site low impact development (LID) BMPs to support infiltration, where feasible, into the design of future projects. Further, implementation of LID BMPs, where feasible, would protect the quality of groundwater resources and address the potential for transport of pollutants of concern through either detention/retention or infiltration, consistent with the requirements of the Municipal Separate Storm Sewer System (MS4) Permit issued by the San Diego RWQCB, and the City's Stormwater Standards Manual and Drainage Design Manual. The Blueprint SD PEIR determined that implementation of LID BMP design elements would ensure infiltration of stormwater runoff and reduce the amount of pollutants transported from the project areas to receiving waters. Thus, through compliance with the existing regulatory framework addressing protection of water quality, the Blueprint SD PEIR concluded direct and cumulative impacts related to groundwater would be less than significant.

College Area CPU

The southwest corner of the College Area CPU area (near the Collwood Boulevard/El Cajon Boulevard intersection) is located within the Coastal Plain of San Diego Groundwater Basin (9-033). This groundwater basin is assigned a Low Priority Basin and not designated as a critically over drafted basin or adjudicated area by the California Department of Water Resources (CDWR 2020). Pursuant to the Sustainable Groundwater Management Act, Low Priority Basins are not required to prepare groundwater sustainability plans to manage long-term sustainability of groundwater within the basin. Groundwater use in the City is limited due to the availability of imported water and comprises a very small portion (approximately five percent) of the San Diego region's water supply portfolio (San Diego County Water Authority 2025). Development implemented under the College Area CPU is not anticipated to include or require the extraction of groundwater.

Development could interfere with groundwater recharge if it proposes to use groundwater or if it results in an increase in impervious surfaces within previously undeveloped sites which would impede groundwater infiltration and recharge. While a majority of the anticipated development within the College Area CPU would consist of redevelopment of existing developed sites, some development of vacant land could occur. Generally, redevelopment would increase the capacity for

groundwater recharge as most existing development was constructed prior to current water quality standards being in place which require some level of site infiltration, where feasible.

Future individual development projects in accordance with the College Area CPU would be required to implement onsite LID BMPs into the project design, as applicable, consistent with the MS4 Permit issued by the San Diego RWQCB, and the City's Stormwater Standards Manual and Drainage Design Manual. Compliance with current stormwater regulations would ensure infiltration of stormwater runoff and protection of water quality, which would also protect the quality of groundwater resources and support infiltration where appropriate. Further, the College Area CPU proposes policies which address groundwater recharge, including Policy 4.37 which encourages the design of street improvements that include stormwater infiltration measures that reduce stormwater runoff and flooding where warranted feasible. Impacts would be less than significant. Therefore, the proposed project is consistent with the hydrology impact conclusions identified in the Blueprint SD PEIR for groundwater, and would not result in new significant impacts or a substantial increase in the severity of previously identified impacts.

V.9.2 Drainage

Blueprint SD PEIR

Hydrology impacts related to drainage are evaluated in Section 4.9.4 (Issue 2) of the Blueprint SD PEIR.

The Blueprint SD PEIR concluded that future projects would be required to comply with the City's drainage and floodplain regulations in the SDMC and adhere to the City's Drainage Design Manual, ESL Regulations protecting floodplains, Federal Emergency Management Agency (FEMA) standards, and the City's Stormwater Standards Manual. Compliance with these regulations would ensure development is designed to avoid drainage impacts due to erosion and siltation, surface runoff, stormwater drainage systems, and flood flows. Therefore, the Blueprint SD PEIR concluded direct and cumulative impacts would be less than significant.

College Area CPU

The College Area CPU is located within two hydrologic units, which are entire watersheds of one or more streams. Most of the CPU area occurs within the San Diego hydrologic unit (HU), which encompasses a long, triangular-shaped area of about 440 square miles drained by the San Diego River. The portion of the College Area CPU area within the San Diego HU is within the Mission San Diego hydrologic subarea (HSA) of the Lower San Diego hydrologic area (HA). HAs are major tributaries and/or major groundwater basins within the HU, and HSAs are major subdivisions of HAs including both water-bearing and non-water bearing formations. A small area along the southern CPU area boundary, generally parallel to El Cajon Boulevard, is located within the Chollas HSA of the San Diego Mesa HA of the Pueblo San Diego HU. The Pueblo San Diego HU is a triangular-shaped area encompassing approximately 60 square miles with no major stream system but is within the San Diego Bay watershed.

Erosion and Siltation

Future development under the College Area CPU could potentially result in increased erosion or siltation both on-site and off-site. The alteration of drainage patterns and increase in runoff associated with the addition of impervious surfaces and structures can increase the frequency and amount of flooding and potentially result in accelerating the rate of erosion and siltation throughout the watershed. Future development projects would be required to comply with the City's Stormwater Standards Manual, Drainage Design Manual, and Jurisdictional Runoff Management Plan (JRMP). In general, smaller infill projects would not substantially increase impervious surface areas and implementation of on-site stormwater construction BMPs in compliance with the City's JRMP would suffice to minimize impacts. For larger projects involving substantial changes in drainage patterns, impervious surfaces, and resulting surface runoff, additional studies may be required to determine compliance with the City's Stormwater Standards Manual.

Site-specific hydrology or drainage studies would determine pre- and post- construction peak runoff flow rates and velocities, as well as the potential for siltation and erosion for sites discharging to natural waterbodies. Erosion and siltation resulting from increased runoff would be generally avoided or reduced through site design, source control and structural pollutant control BMPs, and hydromodification management requirements, as required for certain types of projects in compliance with the City's Stormwater Standards Manual and Drainage Design Manual. Future projects within the College Area CPU area would be required to comply with the regulatory framework in place at the time that ensures development is designed to avoid drainage impacts due to erosion and siltation. Impacts would be less than significant. Therefore, the proposed project is consistent with the hydrology impact conclusions identified in the Blueprint SD PEIR for drainage related to erosion and siltation, and would not result in new significant impacts or a substantial increase in the severity of previously identified impacts.

Surface Runoff

Future development projects under the College Area CPU could potentially increase surface runoff and change stream-flow velocities or quantities. The College Area CPU area is mostly developed with impervious surfaces (associated with existing buildings, roadways, and parking areas), and future development in accordance with the proposed CPU would be concentrated within existing developed areas. Streams and drainages within the CPU area are generally limited to canyon areas and Alvarado Creek. In general, runoff is directed into the municipal storm drain system and conveyed into local canyons or Alvarado Creek. Downstream receiving waters include the San Diego River (runoff from most of the CPU area), Chollas Creek (for the very southern portion of the CPU), and ultimately the Pacific Ocean.

Future development within the College Area CPU area may result in an increase in impervious surfaces and has the potential to change runoff characteristics, including drainage patterns and runoff volumes and/or rates, which could result in flooding. Future individual projects would be required to comply with the City's Stormwater Standards Manual. These regulations ensure the City's compliance with the NPDES permit requirements and San Diego Regional MS4 permit issued by the San Diego RWQCB. The Stormwater Standards Manual contains requirements that dictate design elements in development and redevelopment projects. Requirements pertaining to stormwater runoff include the implementation of on-site LID BMPs, such as detention/retention basins, permeable pavement, cisterns, and rain barrels, to retain stormwater on-site and limit runoff. The Stormwater Standards Manual also includes the applicable requirements of the Final

Hydromodification Management Plan prepared by the County of San Diego and implemented by the MS4 Permit Co-permittees of the San Diego Region. These requirements include design elements to limit stormwater runoff discharge rates and durations, specifically in locations where downstream channels are susceptible to erosion. Future development projects would also be subject to the drainage regulations contained in the SDMC Chapter 14, Article 2, Division 2, Stormwater Runoff and Drainage Regulations and the JRMP, which require that all development be conducted to prevent erosion and stop sediment and pollutants from leaving the property to the maximum extent practicable.

Further, most of the canyons and natural slopes within the CPU area are located within the MHPA or are designated as open space. Future development within the College Area CPU area would be focused in previously disturbed and developed urbanized areas and would not directly impact canyons, drainages, or streams and associated drainage patterns. Development adjacent to the MHPA would be subject to the MHPA Land Use Adjacency Guidelines. In addition, the College Area CPU includes policies that support open space preservation, drainage management, and stormwater infrastructure improvements, including but not limited to, Policy 4.37 which calls for designing street improvements that include stormwater infiltration measures that reduce stormwater runoff and flooding where warranted feasible; Policy 4.39, which calls for prioritizing planting of street trees that add color and visual interest, provide shade, and improve air quality, stormwater management, and result in other environmental benefits; Policy 4.42 which encourages the consideration of green street improvements to reduce stormwater runoff; Policy 8.2 which calls for designing public facilities with an expanded urban tree canopy to reduce the heat island effect, reduce stormwater runoff, and improve air quality; and Policy 8.30 which calls for minimizing urban runoff and flooding by minimizing impervious surfaces, increasing green spaces, and incorporating sustainable stormwater facilities such as bio-swales and permeable pavement. As such, the project would not result in alterations to existing drainage patterns in a manner that would result in flooding on- or off-site. Impacts would be less than significant. Therefore, the proposed project is consistent with the hydrology impact conclusions identified in the Blueprint SD PEIR for drainage related to surface runoff, and would not result in new significant impacts or a substantial increase in the severity of previously identified impacts.

Stormwater Drainage Systems

Future development in accordance with the College Area CPU has the potential to exceed the capacity of existing or planned stormwater drainage facilities. Stormwater drainage facilities are designed to prevent flooding by collecting stormwater runoff and directing flows to the nearest downstream waterbody and/or away from urban development. If drainage facilities are not adequately designed, built, or properly maintained, the capacity of the existing facilities can be exceeded, resulting in flooding and increased sources of polluted runoff. The capacity of a drainage structure can typically be adequately determined by a site-specific hydrology and drainage study. Required compliance with the City's Stormwater Standards Manual and Drainage Design Manual would ensure that future development would not contribute runoff that exceeds the capacity of stormwater drainage systems and that drainage from an existing site is treated to remove pollutants. The requirements for on-site LID BMPs, such as stormwater detention/retention BMPs set forth in the City's Stormwater Standards Manual, would minimize impervious areas and reduce project runoff and the potential transport of pollutants to the City's stormwater drainage systems. Furthermore, the City's Stormwater Department actively maintains and repairs the City's existing

stormwater infrastructure to ensure adequate stormwater conveyance. Impacts would be less than significant. Therefore, the proposed project is consistent with the hydrology impact conclusions identified in the Blueprint SD PEIR for drainage related to stormwater drainage systems, and would not result in new significant impacts or a substantial increase in the severity of previously identified impacts.

Flood Flows

Designated FEMA flood zones within the College Area CPU area are limited to the northeast portion of the CPU area along the Alvarado Creek alignment near the I-8/College Avenue interchange and adjacent to Alvarado Road. These areas are designated as Special Flood Hazard Areas (SFHAs; Zone AE and Regulatory Floodway) and Other Areas of Flood Hazard (Zone X), which are areas with a 0.2-percent Annual Chance Flood Hazard, areas of 1-percent annual chance flood with average depth less than one foot or with drainage areas of less than one square mile.

The College Area CPU proposes a Community Village land use designation along Alvarado Road that is within designated FEMA flood zones. Future development under the College Area CPU would be required to adhere to applicable regulations regarding flood protection. Development within floodways must be consistent with the uses allowed by the SDMC. Development in floodways would also need to be offset by improvements or modifications to enable the passage of a base flood, in accordance with the FEMA standards and regulations provided in SDMC Section 143.0146 and would be required to demonstrate compliance with the City's Flood Mitigation Plan and development regulations for SFHAs (SDMC Sections 143.0145 and 143.0146). Furthermore, all future development within the College Area CPU area would be required to adhere to the City's Drainage Design Manual, ESL Regulations protecting floodplains, and the City's Stormwater Standards Manual. Impacts related to changes in drainage patterns affecting flood flows would be avoided through site-specific evaluation of local hydrology and preparation of design plans approved by the City Engineer. Through regulatory compliance, impacts related to drainage changes affecting flood flows associated with implementation of the College Area CPU would be less than significant. Therefore, the proposed project is consistent with the hydrology impact conclusions identified in the Blueprint SD PEIR for drainage related to flood flows, and would not result in new significant impacts or a substantial increase in the severity of previously identified impacts.

V.9.3 Inundation

Blueprint SD PEIR

Hydrology impacts related to the risk of pollutants release due to inundation are evaluated in Section 4.9.4 (Issue 3) of the Blueprint SD PEIR.

The Blueprint SD PEIR concluded that impacts related to pollutant release resulting from inundation within the Blueprint SD Initiative, Hillcrest FPA, and University CPU would be significant for areas within flood hazard zones. Future development would be required to comply with the City's Flood Mitigation Plan and the SDMC for development regulations for SFHAs (SDMC Sections 143.0145 and 143.0146) which would ensure flood hazards and the corresponding risk of release of pollutants due to inundation are minimized. However, the Blueprint SD PEIR concluded that due to portions of the Climate Smart Village Areas being located within the Mission Valley Community Plan area, which is

designated Zone X with a Provisionally Accredited Levee (PAL) note, direct impacts associated with the Blueprint SD Initiative are considered significant due to the level of uncertainty regarding the potential flooding impact related to development behind the PAL area. Further, because this is a localized impact and would not contribute to a cumulative flooding impact, the Blueprint SD PEIR concluded that cumulative impacts would be less than significant.

College Area CPU

Implementation of the College Area CPU would result in additional multi-family and mixed-use development within the CPU area. Land uses anticipated by the project are not uses that are typically associated with the release of pollutants compared to other uses, such as industrial and manufacturing uses. However, in the event of inundation, pollutants could be released.

As discussed above, the northeast portion of the College Area CPU area is mapped within flood hazard zones, and the CPU proposes a Community Village land use designation along Alvarado Road that is within designated flood hazard zones (Zone AE and Regulatory Floodway). Future development under the College Area CPU would be subject to applicable requirements, such as the City's ESL Regulations related to flood hazard zones, and federal requirements, including City requirements for protection from flooding such as elevating the lowest floor of a structure at least two feet above the base flood elevation (SDMC 143.0146(b)(2)). Fully enclosed areas below the lowest floor that are subject to flooding are required to comply with FEMA requirements for flood proofing. Pursuant to SDMC Sections 143.0145 and 143.0146, future development projects within SFHAs must also undergo a project-level analysis to determine the effects of the project to base flood elevations and ensure that no flooding, erosion, or sedimentation impacts occur on or offsite. Nevertheless, at this program level of review, impacts related to flooding in the College Area CPU area would be considered significant due to existing flood risks being present that could affect pollutant release. At a program level of review, no feasible mitigation measures are available. Impacts would be significant and unavoidable. Therefore, the proposed project is consistent with the hydrology impact conclusions identified in the Blueprint SD PEIR for release of pollutants due to inundation in flood hazard areas.

The portion of the College Area CPU area along the northern CPU area boundary is located within a dam inundation area associated with the Murray Dam to the northwest at Lake Murray in the City of La Mesa. The dam inundation area is the area downstream of a dam that would be flooded in the event of a failure or uncontrolled release of water. For the Murray Dam, the inundation area encompasses the areas surrounding the spillway, Alvarado Creek and part of the San Diego River (City 2024a). Dam failure, however, is considered a low-probability event because dams are inspected annually by the California Division of Safety of Dams to ensure they are in good operating condition. Continued evaluation of dam stability and continued compliance with State regulations would ensure risk associated with flooding due to dam failure is considered minimal, and therefore, impacts associated with risk of pollutant release in the event of dam failure would be less than significant. Therefore, the proposed project is consistent with the hydrology impact conclusions identified in the Blueprint SD PEIR for inundation related to dam failure.

The College Area CPU area is located inland, approximately nine miles from the Pacific Coast, and is not within a mapped tsunami inundation zone. According to the Blueprint SD PEIR, no area within

the City is subject to risk of inundation due to seiche. Therefore, impacts associated with risk of pollutant release in the event of a tsunami or seiche would be less than significant.

The proposed project is consistent with the hydrology impact conclusions identified in the Blueprint SD PEIR related to risk of pollutants release due to inundation, and would not result in new significant impacts or a substantial increase in the severity of previously identified impacts.

V.9.4 Conclusion

Based on the foregoing analysis and information, there is no evidence that the College Area CPU would require a major change to the Blueprint SD PEIR related to hydrology.

The Blueprint SD PEIR concluded hydrology impacts related to groundwater, drainage, and the risk of pollutants release due to inundation resulting from dam failure, tsunami, or seiche were less than significant and no mitigation was required. Likewise, the project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin, would not substantially alter the existing drainage pattern of the site or area, and would not risk release of pollutants due to project inundation due to dam failure, tsunami, or seiche. Consistent with the Blueprint SD PEIR, project hydrology impacts related to the risk of pollutants release due to inundation in flood hazard areas would be significant and unavoidable at the program level, with no feasible mitigation. The College Area CPU would not result in any new significant hydrology impacts, nor would it result in a substantial increase in the severity of hydrology impacts from those described in the Blueprint SD PEIR.

V.10 Land Use and Planning

V.10.1 Physical Division of a Community

Blueprint SD PEIR

Land use impacts related to the physical division of a community are evaluated in Section 4.10.4 (Issue 1) of the Blueprint SD PEIR.

The Blueprint SD PEIR determined that overall policy changes and improvements to the mobility network are intended to support community accessibility and connectivity. Implementation of the land use and policy framework defined by the Blueprint SD Initiative, Hillcrest FPA, and University CPU, would not result in a physical division of the community. The Blueprint SD PEIR concluded direct and cumulative impacts would be less than significant.

College Area CPU

The College Area CPU would support opportunities for more homes and jobs within appropriate areas including within the Climate Smart Village Areas near SDSU and within proximity to transit facilities, along El Cajon Boulevard and other major transportation routes. Future implementation of the proposed multi-modal improvements to the mobility network in the CPU area, including planned

SANDAG transportation investments, would support enhanced and equitable transit service. Implementation of these planned transit improvements has a key goal of connecting communities, not dividing them. City and SANDAG policies which focus on enhancing pedestrian, bicycle and transit connections would be implemented through the design of future infrastructure improvements within the College Area CPU area, avoiding the physical division of community.

The College Area CPU's Mobility Element includes goals and policies to support improvements to the mobility network to increase connectivity within the City by providing enhanced pedestrian, bicycle and transit connections. These policies include, but are not limited to, policies 3.1 through 3.9 which support creating a continuous pedestrian and bicycle network with amenities to further accommodate and encourage residents to walk or ride a bike for their commuting and daily needs, and also support enhancements to the mobility network to improve transit reliability and efficiency. Such mobility improvements would support the goal of creating a well-connected network for pedestrians, bicyclists, and transit riders, would support improved air quality, public health, and connectivity, and would not have the potential to physically divide a community. Future site-specific discretionary projects would be reviewed for consistency with applicable policies in the College Area CPU's Mobility Element.

Individual site-specific development projects implemented under the College Area CPU would additionally be required to comply with SDMC Chapter 12, Article 9, Division 7 during construction, which could include requirements for traffic control plans to ensure community accessibility is retained and/or alternative routes are provided. As such, the implementation of the College Area CPU would not include elements that would physically divide a community, and impacts would be less than significant. Therefore, the proposed project is consistent with the impact conclusions identified in the Blueprint SD PEIR for the physical division of a community, and would not result in new significant impacts or a substantial increase in the severity of previously identified impacts.

V.10.2 Conflict with a Land Use Plan, Policy, or Regulation

Blueprint SD PEIR

Land use impacts related to conflict with a land use plan, policy, or regulation are evaluated in Section 4.10.4 (Issue 2) of the Blueprint SD PEIR.

The Blueprint SD PEIR concluded that implementation of the Blueprint SD Initiative, Hillcrest FPA, and University CPU would be consistent with the applicable environmental goals, objectives, or guidelines of the SANDAG 2021 Regional Plan, General Plan and General Plan Noise Element, ESL Regulations, California Coastal Act, MSCP SAP, VPHCP, CAP, Historical Resource Regulations, Airport Land Use Compatibility Plans (ALUCPs), and affordable housing regulations. Therefore, the Blueprint SD PEIR concluded direct and cumulative impacts would be less than significant.

College Area CPU

Plans, policies, and regulations assessed for project consistency include applicable ones that were analyzed in the Blueprint SD PEIR, including SANDAG's 2021 Regional Plan, the City's General Plan, CAP, the City's ESL Regulations, the City's Historical Resource Regulations, the City's Affordable Housing Regulations, the MSCP SAP, the VPHCP, and Montgomery Field ALUCP. As discussed below,

the College Area CPU would not conflict with these plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect. Impacts would be less than significant. Therefore, the proposed project is consistent with the impact conclusions identified in the Blueprint SD PEIR for conflict with a land use plan, policy, or regulation, and would not result in new significant impacts or a substantial increase in the severity of previously identified impacts.

SANDAG's 2021 Regional Plan (Amendment 2023)

Implementation of the College Area CPU would be consistent with SANDAG's 2021 Regional Plan (2023 Amendment) as it supports land use changes that would allow for increased residential and mixed-use development density and intensity in locations near transit. Within the College Area CPU area, development intensities are concentrated around transit facilities (SDSU Trolley Station and UCSD Health East Trolley Stations) and along major roadways that are served by bus routes, including El Cajon Boulevard, College Avenue, and Montezuma Road. Implementation of the land use changes proposed in the College Area CPU would be consistent with and implement key goals of SANDAG's 2021 Regional Plan due to growth being planned within focus areas identified as Climate Smart Village Areas as well as in proximity to transit. The Blueprint SD Initiative's Village Climate Goal Propensity Map provides a citywide land use framework designed around the 2050 SANDAG Regional Plan transportation network and identifies Climate Smart Village Areas which are areas that have good access to homes, jobs, and mixed-use destinations, that are in proximity to high frequency transit services, have transit access to job centers, and have good connections between transit and destinations. The College Area CPU land use plan was developed consistent with the Village Climate Goal Propensity Map and focuses increases in density and development intensity in areas in proximity to existing and planned transit; thus the College Area CPU is consistent with SANDAG's 2021 Regional Plan.

City of San Diego General Plan

The College Area CPU would facilitate transit-oriented, mixed-use villages, and developments consistent with the General Plan's City of Villages Strategy and Village Climate Goal Propensity Map (General Plan Figure LU-1). The proposed project would also implement the General Plan's goals, objectives, and policies related to the provision of housing and affordable housing.

The following is an analysis of how the project is consistent with applicable elements of the City's General Plan.

Land Use Element and Community Planning Element

The Land Use and Community Planning Element provides policies to guide the City's growth and implement the City of Villages strategy within the context of the City's community planning program. The community planning program is the mechanism to refine citywide policies, designate land uses, and make additional site-specific recommendations as needed. The Land Use and Community Planning Element establishes the structure to respect the diversity of each community and includes policy direction to govern the preparation of community plans.

The College Area CPU goals and policies implement the General Plan City of Villages strategy which focuses on directing population growth into mixed-use activity centers that are pedestrian-friendly

and linked to an improved regional transit system. Consistent with this, the College Area CPU would focus higher density development, including mixed-use villages near the SDSU Transit Center Trolley Station and the UCSD Health East Trolley Station and along transportation corridors that are served by bus transit, such as El Cajon Boulevard, College Avenue, and Montezuma Road. This land use development pattern is consistent with the General Plan's Village Climate Goal Propensity Map (General Plan Figure LU-1), which shows a large portion of the College Area CPU area as having medium to high propensity for village development.

The College Area CPU implements the General Plan land use framework and land use policies at the community level, which is the intended role and relationship of the City's General Plan with individual community plans. Community plans contain more detailed land use designations and site-specific policy recommendations that are tailored to the specific community. While community plans address specific community needs, their policies and recommendations must be consistent with the General Plan. Such is the case with the proposed College Area CPU; its land use and policy frameworks provide a guide for future development within the community that is consistent with the overarching land use and policy frameworks, particularly the City of Villages strategy, within the General Plan.

Mobility Element

An overall goal of the Mobility Element is to achieve a balanced, multimodal transportation system that allows people to move around safely, conveniently, and enjoyably while minimizing environmental and neighborhood impacts. The Mobility Element contains policies that help walking/rolling, bicycling, and micromobility devices become more viable for short trips, and for transit to link highly frequented destinations more efficiently. It also includes a vision for improving existing streets consistent with Complete Streets planning principles and concepts that will result in dynamic, vibrant corridors that support all modes of travel. Furthermore, the Mobility Element identifies the proposed transportation system and strategies designed to meet the future mobility needs generated by planned new growth.

The College Area CPU supports high-density residential and mixed-use development in areas with access to public transit and encourages multimodal options in an effort to reduce automobile trips. This is demonstrated by the CPU land use plan which concentrates higher density residential and village development near the SDSU Transit Center and UCSD Health East Trolley Station, as well as along major roadways that are served by bus transit. The planned transit, pedestrian, bicycle, and roadway networks within the College Area CPU Mobility Element are consistent with the overall mobility goal of the General Plan Mobility Element. In addition, the environmental impacts associated with automobile use would be minimized accordingly through the implementation of Mobility Element policies at the project level. The policies of the College Area CPU Mobility Element are consistent with the General Plan Mobility Element's goals of the development of a balanced, multimodal transportation network.

Urban Design Element

The Urban Design Element addresses urban form and design through policies aimed at respecting the natural environment, preserving open space systems, and targeting new growth into compact villages.

Implementation of the College Area CPU would be consistent with the General Plan City of Villages strategy and would focus development within mixed-use activity centers that are pedestrian-friendly and linked to an improved regional transit system. The College Area CPU targets higher density residential and urban village development near transit facilities and corridors, which is consistent with the General Plan Mobility Element goal to “direct growth into transit-oriented mixed-use and commercial areas where a high level of activity already exists or can be realized.” The College Area CPU includes policies within the Urban Design Element which would provide for cohesive design themes, visual elements, and development patterns on a communitywide basis as the CPU area is built out. Development within the College Area CPU’s CEOZ areas and greenways as depicted in Figure 15, *Community Enhancement Overlay Zone Area & Greenways*, would also be required to comply with the applicable regulations in SDMC Section 132.1601 et seq. which provides supplemental design regulations regarding the provision of public spaces, including greenways, paseos, plazas, podiums, and urban greens, as well as site-specific design regulations regarding the provision of parkways and greenways within specific areas of the CEOZ areas. The College Area CPU’s Open Space and Conservation Element also includes policies which address sustainable development (Policies 7.1 through 7.4) and natural resources conservation (Policies 7.5 and 7.6). Adherence to the proposed policy framework would result in development that respects the natural environment and preserves open space.

Economic Prosperity Element

The Economic Prosperity Element is intended to ensure that the economy grows in ways that strengthens San Diego industries, retains and creates good jobs with self-sufficient wages, increases average income, and stimulates economic investment in the City’s communities.

The College Area CPU supports this overall goal by allowing for higher density residential and multi-use village development near activity centers, transit facilities, and along transportation corridors within the community. These areas would be linked by transit and active transportation modes through coordinated land use and mobility policies. Moreover, specific policies within the College Area CPU would be consistent with the Economic Prosperity Element, including but not limited to, Policy 5.2 which calls for encouraging revitalized commercial areas with mixed-use development that improves aesthetics for ground floor commercial shops and service activities; Policy 5.4 which encourages health sector employment growth near the East Campus Medical Center at UC San Diego Health; Policy 5.5 which calls for promoting opportunities for innovation sector start-up businesses that can provide jobs, services, and investment benefiting both the university and surrounding neighborhoods; and Policy 5.6 which calls for promoting opportunities for design, art, film, and other creative industries related to San Diego State University while also fostering community-based arts, cultural exchange, and local entrepreneurship that contribute to a vibrant and inclusive economy.

Public Facilities, Services, and Safety Element

This element ensures the provision and maintenance of infrastructure and public facilities and services for future growth within the City. It also includes policies associated with healthcare services and facilities, hazard and disaster preparedness, and seismic safety.

As the implementation of the College Area CPU would facilitate higher density development consistent with the Village Climate Goal Propensity Map, the provision of new and expanded infrastructure and public services would be necessitated. The College Area CPU Public Facilities, Services & Safety Element addresses public services, facilities, and health and safety issues within the College Area CPU area and provides guidance when considering new and enhanced facilities within the community through specific policies related to location and design of new and enhancement of facilities; public schools; libraries; healthcare; police; fire-rescue; flooding/stormwater; seismic safety; lighting, landscaping, and maintenance; and extreme heat. Future development implemented under the College Area CPU would be required to provide or fund necessary facility improvements through payment of development impact fees to implement neighborhood supportive infrastructure. Public infrastructure and service needs would be evaluated as development is implemented.

Recreation Element

This element provides citywide guidance for the preservation, protection, acquisition, development, operation, maintenance, and enhancement of public recreation opportunities and facilities throughout the City for all users.

The proposed College Area CPU Recreation Element aims to enhance the recreational value of parks and public spaces by expanding and reimagining them to maximize their value to the community. It envisions a well-connected system of parks, recreational facilities, and open space that provide opportunities for passive and active recreation, social interaction, community gatherings, and the enhancement of public spaces and streets. It also contains goals and policies meant to facilitate the achievement of the General Plan Recreation Element standards. In addition, future development implemented under the College Area CPU would be required to provide a new community-serving infrastructure amenity or would be required to pay a Neighborhood Enhancement Fee, which would go towards the construction of neighborhood enhancing improvements. Future development within the College Area CPU's CEOZ areas would also be required to provide public spaces in accordance with the SDMC Section 132.1601 et seq. The provision of public spaces or other community-serving amenities or payment of this fee would implement, and be consistent with, the General Plan Recreation Element policy to encourage private development to include recreation facilities.

Conservation Element

This element addresses hillside and open space conservation and habitat protection, as well as sustainability goals. The goal of the Conservation Element is to provide for the long-term conservation and sustainable management of the rich natural resources that help define the City's identity, contribute to its economy, and improve its quality of life. It contains policies to guide the conservation of natural resources, including water, open space, air quality, biodiversity, minerals, agriculture, natural materials, recyclables, topography, views, and energy.

The College Area CPU's Open Space and Conservation Element is consistent with the General Plan Conservation Element in that the proposed policy framework reinforces the protection and enhancement of open space and sensitive species and habitat within the CPU area. It provides policies and land use guidance that address natural resource conservation, reduction in the use of non-renewable resources, and climate resiliency. Specific policies protect open space (Policies 7.5

and 7.6). It also includes policies to encourage sustainable development, green infrastructure practices, and water conservation (e.g., Policies 7.1 through 7.3, 8.30 through 8.32 and 8.36), consistent with the energy conservation goals of the General Plan Conservation Element. The CPU includes other sustainable building design policies geared toward promoting energy conservation and reducing heat gain and promoting passive cooling (see Policies 4.50 through 4.53 and Policies 8.42 through 8.44).

Implementation of these policies through development, infrastructure investment, and participation in citywide and regional initiatives would conserve natural resources, minimize ecological footprints and maintain the long-term community health.

Noise Element

The Noise Element focuses on minimizing excessive noise effects and improving the quality of life of people working and living in the City. The Noise Element identifies goals and related policies with regards to noise and land use compatibility, motor vehicle traffic noise, and trolley and train noise.

Future development under the proposed College Area CPU could result in the exposure of sensitive receptors to ambient noise from motor vehicle traffic that exceeds standards established in the City's Noise Element of the General Plan. While impacts of existing noise levels on future projects are generally not considered an impact under CEQA (e.g., because it addresses impacts of the environment on the project), this issue is addressed in the context of the City's Noise Element Standards which sets standards for exterior noise exposure associated with development projects. From a CEQA perspective, a significant impact would only result if a project would contribute traffic to a degree that would increase existing traffic noise levels by 3 dB(A), which generally would require a doubling of traffic volumes.

Regarding compatibility with Land Use–Noise Compatibility Guidelines, transportation noise is generally the dominant noise source with a community's noise environment. Because future development within the College Area CPU would be concentrated primarily along major transportation corridors, it is anticipated that traffic noise (primarily from I-8, El Cajon Boulevard, College Avenue, Montezuma Road, and others) would dominate the noise environment. Other transportation noise sources would include trolley travel, horns, emergency signaling devices, and stationary bells at grade crossings. It is possible that noise levels from these transportation sources in outdoor usable spaces may exceed the General Plan's Land Use–Noise Compatibility Guidelines.

As stated in the General Plan Noise Element, exterior noise levels ranging between 65 and 70 CNEL are considered "conditionally compatible" for multi-family units, and although not generally considered compatible, the City conditionally allows multi-family and mixed-use residential uses up to 75 dB(A) CNEL in areas affected primarily by motor vehicle traffic noise with residential uses with a requirement to include noise attenuation measures to ensure an interior noise level of 45 dB(A) CNEL where a Community Plan allows multi-family and mixed-use. Any future residential use exposed to noise levels up to 75 CNEL must include attenuation measures to ensure an interior noise level of 45 CNEL.

Due to planned increased development potential within areas subject to transportation noise including near transit facilities and along major transportation corridors, future development within

the College Area CPU could be subject to ambient noise levels in excess of General Plan noise level standards. Future projects consistent with the College Area CPU would be required to implement site attenuation and project design features as applicable, which would typically be sufficient to reduce noise levels to provide consistency with the standards. However, it is not possible to ensure all outdoor use areas would meet the City's noise level standards at this program level of review. Consistency with the City's noise compatibility standards would be disclosed in environmental documents; however, an inconsistency with the compatibility standards would typically be the result of existing environmental noise affecting the project, which as previously noted is not significant under CEQA (e.g., impact of the environment on the project).

The College Area CPU Land Use Element would align with the General Plan Noise Element commercial and mixed-use activity noise goal to minimize exposure of residential and other noise-sensitive land uses to excessive commercial and mixed-use related noise through inclusion of College Area CPU Policy 2.13 which encourages the use of appropriate operational measures to reduce noise for conditionally permitted commercial uses and mixed-use developments, where eating, drinking, entertainment, and assembly establishments are adjacent to residential uses.

Regarding interior noise, Title 24 requirements would apply during the building permit review and would require residential/habitable interior noise standards of 45 dB(A) CNEL, and non-residential interior noise standards of 50 dB(A) CNEL. In addition, Section 1207 of the CBC requires that interior noise levels attributable to exterior sources are not to exceed 45 CNEL in any habitable room. Generally, modern construction techniques can provide sufficient attenuation to reduce noise levels to meet the CBC requirement. Adherence to Title 24 requirements for interior noise analysis prior to issuance of a building permit would ensure compatibility with the General Plan Noise Element's interior noise standards.

Historic Preservation Element

The Historic Preservation Element is intended to guide the preservation, protection, restoration, and rehabilitation of historical and cultural resources and maintain a sense of the City. It also aims to improve the quality of the built environment, encourage appreciation for the City's history and culture, maintain the character and identity of communities, and contribute to the City's economic vitality through historic preservation.

Consistent with the Historic Preservation Element, the College Area CPU Historic Preservation Element contains policies that would restore and protect resources within the CPU area at a project level for future development. Such policies include preparation of site-specific studies to identify potential archaeological, tribal cultural, and historic resources (Policies 9.2, 9.5 through 9.8), initiation of Native American consultations for site-specific development (Policy 9.1), and implementation of avoidance and mitigation measures for resources identified during site-specific investigations (Policies 9.3 through 9.5). Future development under the College Area CPU would also be required to comply with the City's Historical Resource Regulations, which protect and preserve historical resources and archaeological sites.

Environmental Justice Element

The Environmental Justice Element focuses on reducing pollution exposure, improving air quality, and promoting public facilities, food access, safe and healthy homes, and physical activity. This element also encourages and supports inclusive public engagement in City decisions. It strives to uphold existing high-quality public spaces and amenities while creating the space for more inclusive practices that foster a San Diego where all community members have equal access and opportunities, regardless of where they live in the City.

The Environmental Justice Element identifies the southeast portion of the College Area CPU area (approximately 17 percent of the CPU area) as an environmental justice community, which are areas of the City most impacted and negatively affected by environmental burdens and associated health risks.

The College Area CPU is consistent with the Environmental Justice Element as it proposes a land use plan consistent with the Village Climate Goal Propensity Map which provides opportunities for new homes of various affordability levels with access to services, resources, jobs located near transit; and would reduce VMT per capita to the maximum extent feasible to achieve the GHG reduction goals of the CAP. The College Area CPU includes specific policies that support the goals of the Environmental Justice Element, including but not limited to, Policy 2.1 which calls for providing a diverse mix of housing types that are affordable to people of all incomes, including homes for seniors, students and families; Policy 2.3 which encourages fair housing by providing access to services, resources, jobs and housing opportunities located near transit to support affirmatively furthering fair housing; Policy 4.39 which calls for prioritizing planting of street trees that add color and visual interest, provide shade, and improve air quality, stormwater management, and result in other environmental benefits; Policy 7.3 which calls for utilizing sustainable design that reduces greenhouse gas emissions, pollution, dependency on non-renewable energy sources, makes efficient use of local resources, and incorporates sustainable landscaping, water use, and storm-water management; and Policy 8.42 which calls for supporting urban greening projects or programs, such as expanded urban tree canopy, green roofs, green streets, and increased access to green spaces that provide air quality and natural cooling benefits during heat events.

Housing Element

The Housing Element is intended to assist with the provision of adequate housing to serve San Diegans of every economic level and demographic group. The College Area CPU would be consistent with the Housing Element as it would facilitate implementation of higher density residential development which would offer a range of market-rate and affordable units. Implementation of the College Area CPU would result in a net increase of approximately 25,950 additional homes within the community above existing conditions. The College Area CPU also contains housing policies (Policies 2.1 through 2.4, 2.6 and 2.7) to implement the CPU Land Use Element goal to provide "Diverse housing options through construction of new homes and preservation of existing homes that enhance neighborhoods and includes places for people of all incomes to live and work."

City of San Diego Climate Action Plan

The College Area CPU would not conflict with the CAP, as it would be consistent with the CAP's goal of focusing new development in areas that would allow residents, employees, and visitors to safely, conveniently and enjoyably travel as a pedestrian, or by biking, or transit in an area of the City that

supports existing or planned transit. The College Area CPU would encourage transit-oriented, mixed-use development centered around the MTS Green Line Trolley stops, transit centers, and other high-frequency transit services, such as along major roadways. As detailed in Section V.7, *Greenhouse Gasses*, future ministerial, discretionary, and public improvement projects under the College Area CPU would be required to comply with the CAP Consistency Guidelines and/or CAP strategies.

Environmentally Sensitive Land Regulations

The purpose of the ESL Regulations is to protect, preserve, and, where damaged, restore the environmentally sensitive lands of the City of San Diego and the viability of the species supported by those lands (SDMC Chapter 14, Article 3, Division 1). These regulations are intended to assure that development occurs in a manner that protects the overall quality of the resources and the natural and topographic character of the area, encourages a sensitive form of development, retains biodiversity and interconnected habitats, maximizes physical and visual public access to and along the shoreline, and reduces hazards due to flooding in specific areas while minimizing the need for construction of flood control facilities. These regulations are intended to protect public health, safety, and welfare while employing regulations that are consistent with sound resource conservation principles and the rights of private property owners. ESL includes sensitive biological resources, steep hillsides, coastal beaches, sensitive coastal bluffs, and SFHAs (SDMC Chapter 14, Article 3, Division 1). ESL within the College Area CPU includes sensitive biological resources, steep hillsides, and SFHAs.

Future subsequent development facilitated by the implementation of the College Area CPU would be subject to a review (both ministerial and discretionary projects) to identify whether ESL is located within the proposed project-specific development area. Should future development be proposed within ESL, this would trigger a requirement for a discretionary permit to address potential impacts to ESL. The City's ESL Regulations (Chapter 14, Article 3, Division 1) require that projects demonstrate that the proposed development site is physically suitable for the proposed use and would minimize disturbance to natural landforms and not increase flood hazards. Deviations from the ESL Regulations would require supplemental findings to be prepared prior to approval to demonstrate that development would not result in an additional public safety threat or extraordinary public expense or create a public nuisance. As existing procedures are in place to ensure compliance with the ESL Regulations, there would be no conflict with the ESL Regulations.

Historical Resources Regulations

The purpose of the City's Historical Resources Regulations (SDMC Sections 143.0201 through 143.0280) is to protect, preserve, and, where damaged, restore the historical resources of San Diego. Historical resources include historical buildings, historical structures or historical objects, important archaeological sites, historical districts, historical landscapes, and traditional cultural properties.

The College Area CPU area is an urbanized community that began developing in the 1920s and was essentially fully developed by the early 1970s. Based on the Historic Context Statement prepared for the College Area (Page & Turnbull 2023), there are designated historic resources within the College Area CPU, and it was determined that other historic resources may be present, such as agricultural properties from the late 19th century and individual homes in various postwar subdivisions.

Due to the likely presence of historical resources in the College Area CPU area, future development would be required to comply with and implement the Historical Resources Regulations to ensure historic resource evaluation and avoidance, where feasible. These regulations include requiring that development affecting designated historical resources or historical districts provide full mitigation for impacts to a significant resource, in accordance with the Historical Resources Guidelines as a condition of approval. If development cannot to the maximum extent feasible comply with the development regulations for historical resources, then the approval and issuance of a Site Development Permit would be required. As previously noted in the General Plan Historic Preservation Element discussion, the College Area CPU Historic Preservation Element includes policies for the preservation, protection, restoration, and rehabilitation of historical and cultural resources within the College Area CPU area.

Affordable Housing Regulations

The City implements the State Density Bonus Law through its Affordable Housing Regulations (SDMC Chapter 14, Article 3, Division 7). Future development within the College Area CPU area may use the Affordable Housing Regulations to obtain density bonus allowances. Future development may qualify for waivers and/or incentives that allow for deviations to City development regulations such as increases in allowable height and/or floor area ratios, which could result in development allowances in excess of City base zone regulations. As specified in the SDMC Section 143.0740(c)(1)(C) as it relates to incentives and SDMC Section 143.0743(b)(3) as it relates to waivers, requested waivers and incentives shall be analyzed in compliance with CEQA, and no waiver shall be granted without such compliance. The College Area CPU would not conflict with the City's Affordable Housing Regulations because it would not affect the ability of future projects to apply the regulations on a project basis. However, the City would require review of potential deviations requested by future projects as further described below under Section V.10.3, *Deviation or Variance*.

Multiple Species Conservation Program Subarea Plan

Please refer to Section 2, of Attachment 1, for a description of the MSCP SAP regulatory framework and Section 5 for the College Area CPU's consistency analysis with the MSCP SAP. Implementation of the College Area CPU would be consistent with the City's MSCP SAP as future development is planned in primarily urbanized locations and not within MHPA areas, which occur in several canyons and hillsides within the community (see Figure 11, *Open Spaces and Multi-Habitat Planning Area*). Furthermore, future subsequent development would be subject to a review (both ministerial and discretionary projects) to identify whether MHPA, and MSCP covered species are located within or adjacent to the proposed development area. On a project-by-project basis, to minimize direct and indirect impacts to the MHPA, ministerial and discretionary projects located within or adjacent to the MHPA would be required to implement and demonstrate consistency with the MSCP SAP's Land Use Adjacency Guidelines in order to maintain the function of the MHPA. Consistent with the Biology Guidelines and MSCP, the City requires compliance with the Land Use Adjacency Guidelines to be incorporated as project conditions of approval for any development adjacent to the MHPA, which would avoid indirect impacts to the MHPA. As existing procedures and regulatory framework are in place to ensure compliance with the MSCP SAP, there would be no conflict with the MSCP SAP.

Vernal Pool Habitat Conservation Program

Please refer to Section 2 of Attachment 1, for a description of the VPHCP regulatory framework and Section 5 of Attachment for the College Area CPU's consistency analysis with the VPHCP. There are no mapped vernal pools or vernal pool habitat conservation program preserve areas within the College Area CPU area (City 2025). Future subsequent ministerial and discretionary development in accordance with the College Area CPU would occur primarily within developed areas. Therefore, it is unlikely that future development within the College Area CPU would occur within or near vernal pools. In the event any vernal pool resources are identified on or adjacent to a site considered for development under the College Area CPU, the requirements of the City's VPHCP would apply. Impacts to vernal pools would be evaluated for consistency with the VPHCP general conditions for compensatory mitigation and general management directives and appropriate mitigation and management directives would be implemented as a matter of required compliance with the City's VPHCP and MSCP.

Montgomery Field Airport Land Use Compatibility Plan

Most of the College Area CPU area (generally all but the southwest corner) is located within the Airport Influence Area (AIA) for Montgomery-Gibbs Executive Airport and the corresponding Airport Land Use Compatibility Overlay Zone. This area is all within AIA Review Area 2 and outside of Review Area 1. It is also not located within designated safety zones or noise compatibility contours associated with Montgomery-Gibbs Executive Airport (San Diego County Regional Airport Authority 2025). Review Area 1 encompasses locations where noise and safety concerns may necessitate limitations on the types of land use actions. Review Area 2 includes locations within airspace protection and overflight notification areas. Limits on the heights of structures, particularly in areas of high terrain, are the only restrictions on land uses within Review Area 2.

The land use framework depicted in the General Plan's Village Climate Goal Propensity Map was developed with consideration to areas that would be incompatible with increased residential densities. The proposed land use map for the College Area CPU is consistent with the Village Climate Goal Propensity Map and was developed with consideration to airport safety and Federal Aviation Administration height limitations and safety zones. Future development projects within applicable areas would be subject to applicable Airport Land Use Commission review, Federal Aviation Administration notification, and applicable regulations of the Airport Land Use Compatibility Overlay Zone. Based on regulatory compliance, no conflict with ALUCP policies or regulations would occur.

V.10.3 Deviation or Variance

Blueprint SD PEIR

Land use impacts related to deviation or variance are evaluated in Section 4.10.4 (Issue 3) of the Blueprint SD PEIR.

The Blueprint SD PEIR noted that as the Blueprint SD Initiative, Hillcrest FPA, and University CPU actions are planning and policy level actions, no deviations or variances are proposed. However, future development may propose deviations or variances. If findings cannot be supported by the City, the deviation or variance would not be approved. Similarly, the City may approve waivers and/or incentives under the Affordable Housing Regulations and other affordable density bonus

programs; however, impacts resulting from the City's Affordable Housing Regulations and other affordable housing density bonus programs have been addressed as part of the environmental review associated with the adoption of those programs. Therefore, the Blueprint SD PEIR concluded that direct and cumulative impacts resulting from deviations or variances associated with future development would be less than significant with the application of the City's SDMC that require specified findings to be made prior to approval of any deviation or variance.

College Area CPU

The project's actions are also planning and policy level actions and no deviations or variances are proposed. Subsequent discretionary development consistent with the College Area CPU may propose deviations or variances. In addition to deviations and variances allowed pursuant to the SDMC regulations, the Affordable Housing Regulations may be applied to future development. The application of waivers and/or incentives associated with the Affordable Housing Regulations could allow for deviations to the City's development regulations, such as increases in allowable height and/or floor area ratios, which can result in development allowances in excess of the City's base zone regulations and in excess of densities envisioned under the Village Climate Goal Propensity Map.

As future site-specific projects are proposed, the City requires, at the project level review, identification and analysis of proposed deviations and variances to ensure they are compatible with City policy. As part of this review, the potential for adverse environmental impacts is considered. The City's LDC requires certain findings to be made that demonstrate support for proposed deviations or variances. For example, deviations from the City's ESL Regulations are allowed provided specified findings can be made as detailed in SDMC Section 126.0505. Variance findings required for approval are identified in SDMC Section 126.0805. If findings cannot be supported by the City, the deviation or variance would not be approved. In addition, future development projects consistent with the College Area CPU that provide affordable housing may be entitled to incentives and waivers under the City's Affordable Housing Regulations and other affordable density bonus programs. Incentives and waivers allow for deviation from development regulations unless the City makes required findings to deny the incentive and/or waiver. However, impacts resulting from the City's Affordable Housing Regulations and other affordable housing density bonus programs have been addressed as part of the environmental review associated with the adoption of those regulations. Impacts would be less than significant. Therefore, the proposed project is consistent with the impact conclusions identified in the Blueprint SD PEIR for a deviation or variance, and would not result in new significant impacts or a substantial increase in the severity of previously identified impacts.

V.10.4 Conclusion

Based on the foregoing analysis and information, there is no evidence that the College Area CPU would require a major change to the Blueprint SD PEIR relative to land use and planning. The Blueprint SD PEIR concluded that impacts related to land use and planning were less than significant, and no mitigation was required. Likewise, the project would not physically divide an established community or conflict with a land use plan, policy, or regulation (including deviations or variances) adopted for the purpose of avoiding or mitigating an environmental effect. The College Area CPU would not result in any new significant impacts related to land use and planning, nor

would it result in a substantial increase in the severity of land use and planning impacts from those described in the Blueprint SD PEIR.

V.11 Noise

V.11.1 Ambient Noise Levels

Blueprint SD PEIR

Noise impacts related to ambient noise levels are evaluated in Section 4.11.4 (Issue 1) of the Blueprint SD PEIR.

The Blueprint SD PEIR evaluated noise impacts associated with ambient noise levels for construction activities, non-transportation sources, and transportation sources, as summarized below.

Construction Noise

The Blueprint SD PEIR concluded that construction activities related to implementation of the Blueprint SD Initiative, Hillcrest FPA, and University CPU would potentially generate short-term noise levels in excess of 75 dB(A) L_{eq} at adjacent properties, which would exceed the maximum level permitted by SDMC Section 59.5.0404. While the City regulates noise associated with construction equipment and activities through enforcement of its Noise Abatement and Control Ordinance, it is possible that some construction activities could exceed 75 dB(A) L_{eq} in the vicinity of sensitive receptors. Without site-specific development details, such as the extent of construction activities, the construction equipment being utilized, and the distance to sensitive receptors, the Blueprint SD PEIR determined it cannot be ensured, at a program level of analysis, that all construction noise would be reduced to a level below significance. Therefore, the Blueprint SD PEIR concluded that direct and cumulative impacts associated with construction noise would be significant.

The Blueprint SD PEIR includes mitigation measure MM-NOI-1 which requires future discretionary development projects to comply with the construction noise levels limits defined by SDMC Section 59.5.0404, including implementation of site specific noise reduction measures to meet property line limitations. However, even with implementation of Blueprint SD PEIR MM-NOI-1, significant construction noise impacts may still occur as it may not be possible to reduce property line construction noise level limits consistent with the SDMC at all times. If construction noise would exceed the construction noise limits, a permit would be required and would be granted by the Noise Abatement and Control Administrator which allows a project to temporarily exceed standards. Thus, the Blueprint SD PEIR concluded that direct and cumulative impacts would be significant and unavoidable.

Non-Transportation Noise Sources

The Blueprint SD PEIR noted that the Blueprint SD Initiative, Hillcrest FPA, and University CPU areas would contain residential and commercial interfaces, and other land use interfaces may be present including residential near industrial uses. Mixed-use areas where residential uses are located in proximity to commercial sites could expose sensitive receptors to noise above allowable levels. The

City's Noise Ordinance property line standards would apply to all future ministerial and discretionary development consistent with the Blueprint SD Initiative, University CPU, and Hillcrest FPA. While it is not anticipated that stationary sources associated with multi-family residential land uses, such as the use of Heating, Ventilation, and Air Conditioning (HVAC) systems, would result in noise exceeding property line limits, at a program level of review, and without site-specific development details, the Blueprint SD PEIR determined it cannot be ensured that all development would be able to meet property line noise limitations. Therefore, the Blueprint SD PEIR concluded that direct and cumulative impacts associated with non-transportation noise would be significant.

The Blueprint SD PEIR includes mitigation measure MM-NOI-1 which requires development projects to comply with Section 59.5.0401 et seq. of the SDMC, which specifies the maximum one-hour average sound level limits allowed at the boundary of a property. Implementation of MM-NOI-1 is anticipated to be sufficient to reduce noise levels at the property line from stationary sources to less than significant in most cases. While it is not anticipated that stationary sources located within the project areas would result in noise exceeding property line limits, at a programmatic level of review, it cannot be ensured that all future site-specific development can demonstrate compliance. Thus, the Blueprint SD PEIR concluded that direct and cumulative impacts would be significant and unavoidable.

Traffic-Related Noise

The Blueprint SD PEIR determined that future development within the Blueprint SD Initiative, Hillcrest FPA, and University CPU areas could result in increases in transportation noise and could have the potential to increase the exposure of sensitive land uses to traffic noise. Implementation of the Blueprint SD Initiative, Hillcrest FPA, and University CPU would introduce a greater intensity of mixed-use and multi-family development that would generate traffic that would add to existing traffic noise levels. The Blueprint SD PEIR concluded that the increased traffic generated noise could result in an increase in ambient noise levels resulting in a significant direct and cumulative impact.

While the Blueprint SD PEIR concluded that at a program level of review impacts are considered significant, the Blueprint SD Initiative, Hillcrest FPA, and University CPU are intended to support a shift from vehicle traffic toward transit, pedestrian, and bicycle. City implementation of the land use and the policy framework of the CAP, Blueprint SD Initiative, Hillcrest FPA, and University CPU would support non-vehicular modes, which would support reductions in traffic noise over time. The Blueprint SD PEIR concluded that at a program level of review, no feasible mitigation is available to reduce impacts and thus, direct and cumulative impacts would be significant and unavoidable.

College Area CPU

Construction Noise

Although no specific construction or development is proposed at this time, construction noise impacts could occur as future development within the College Area CPU area occurs. Due to the developed nature of the CPU area, it is anticipated that construction activities could take place adjacent to existing structures and that sensitive receptors could be located in proximity to construction sites. Therefore, construction activities related to future development under the College Area CPU could generate short-term noise levels in excess of SDMC standards (75 dB(A) L_{eq})

at adjacent properties. Although future projects would be required to comply with the City Noise Abatement and Control Ordinance, it is possible that some construction activities could exceed 75 dB(A) L_{eq} in the vicinity of sensitive receptors. Without site-specific development details, it cannot be ensured at a program level of analysis that construction noise associated with implementation of the College Area CPU would be reduced to a level below significance. Therefore, impacts associated with construction noise would be significant.

Future discretionary development projects consistent with the College Area CPU would be required to implement Blueprint SD PEIR MM-NOI-1 which reinforces required compliance with the construction noise levels limits in accordance with SDMC Section 59.5.0404, including implementation of site-specific noise reduction measures to meet property line noise limitations. However, significant construction noise impacts may still occur as it may not be possible to reduce property line construction noise level limits consistent with the SDMC at all times. If construction noise would exceed the construction noise limits, a permit would be required and would be granted by the Noise Abatement and Control Administrator which allows a project to temporarily exceed standards. Therefore, construction noise impacts would be significant and unavoidable. Thus, the proposed project is consistent with the impact conclusions identified in the Blueprint SD PEIR for construction noise, and would not result in new significant impacts or a substantial increase in the severity of previously identified impacts.

Non-Transportation Noise Sources

Implementation of the College Area CPU would accommodate higher density residential and mixed-use village development within the CPU area. Noise associated with these land uses would include pedestrian traffic, park activity, and the use of outdoor public spaces. Additionally, the College Area CPU area would contain residential and commercial interfaces, as well as mixed-use areas. Mixed-use areas where residential uses are located in proximity to commercial sites could expose sensitive receptors to noise above allowable levels established by the SDMC. At a program level of review and without site-specific development details, it cannot be ensured that all future development within the College Area CPU area would be able to meet property line noise limitations. Impacts would be significant.

Future discretionary development within the College Area CPU area would be reviewed for consistency with the College Area CPU policies, including Policy 2.13 which encourages the use of appropriate operational measures to reduce noise for conditionally permitted commercial uses and mixed-use developments, where eating, drinking, entertainment, and assembly establishments are adjacent to residential uses. It should also be noted that for residential projects, the effects of noise generated by project occupants and their guests on human beings is not considered to be a significant effect on the environment pursuant to PRC Section 21085.

Future discretionary development projects with stationary sources of noise would be required to implement Blueprint SD PEIR MM-NOI-1 which reinforces required compliance with the maximum one-hour average sound level limits allowed at the boundary of a property per Section 59.5.0401 et seq. of the SDMC. These regulations would ensure any stationary sources of noise such as HVAC equipment are adequately attenuated to meet property line noise level limits. Implementation of MM-NOI-1 would reduce noise levels at the property line from stationary sources to less than significant in most cases. At a project level of review additional project features and/or project-

specific mitigation measures could be identified which would minimize potential wildfire impacts. However, significant noise impacts may still occur because it cannot be ensured that all future development can demonstrate compliance with the property line noise level limits consistent with the SDMC. Thus, noise impacts associated with non-transportation sources would be significant and unavoidable. Therefore, the proposed project is consistent with the impact conclusions identified in the Blueprint SD PEIR for non-transportation noise, and would not result in new significant impacts or a substantial increase in the severity of previously identified impacts.

Transportation Noise

Transportation noise is generally the dominant noise source within a community's noise environment. Because future development within the College Area CPU would be primarily concentrated along major transportation corridors and/or in proximity to existing or planned transit, it is anticipated that traffic noise (primarily from I-8, El Cajon Boulevard, College Avenue, Montezuma Road, and other major transportation corridors) would dominate the noise environment. Other transportation noise sources would include trolley travel, horns, emergency signaling devices, and stationary bells at grade crossings. Therefore, permanent increases in ambient noise levels would primarily be associated with transportation noise.

Implementation of the College Area CPU would introduce a greater intensity of mixed-use and multi-family development that would generate traffic that would add to existing traffic noise levels. Consequently, future development within the College Area CPU area could result in increases in transportation noise and could have the potential to increase the exposure of sensitive land uses to transportation noise. The increased traffic-generated noise could result in an increase in ambient noise levels resulting in a significant impact. Transportation noise impacts to interior spaces would be avoided through required compliance with Title 24 interior noise requirements. Additionally, future discretionary development within the College Area CPU area would be reviewed for consistency with the College Area CPU policies, including Policy 2.13 which calls for the use of appropriate operational measures to reduce noise for conditionally permitted commercial uses and mixed-use developments, where eating, drinking, entertainment, and assembly establishments are adjacent to residential uses. Future transportation noise also has the potential to adversely affect outdoor use areas. Any shift or increase in density could increase traffic volumes along local roadways resulting in increases in ambient noise levels. The General Plan Noise Element Land Use – Noise Compatibility Guidelines identifies acceptable exterior noise exposure for various land use types. Where existing noise levels for the particular land use type are at, or in excess of, the conditionally compatible noise compatibility guidelines, and a project would contribute vehicle trips to surrounding roadways such that traffic noise levels would result in an increase of more than 3 dBA, impacts related to transportation noise would be significant.

The College Area CPU is intended to support a shift from vehicle traffic toward transit, pedestrian, and bicycle use, which would support reductions in traffic noise over time. However, at a program level of review, no feasible mitigation is available to reduce this impact. Associated noise impacts would be significant and unavoidable. Therefore, the proposed project is consistent with the impact conclusions identified in the Blueprint SD PEIR for transportation noise, and would not result in new significant impacts or a substantial increase in the severity of previously identified impacts.

V.11.2 Groundborne Vibration

Blueprint SD PEIR

Noise impacts related to groundborne vibration are evaluated in Section 4.11.4 (Issue 2) of the Blueprint SD PEIR.

The Blueprint SD PEIR concluded that potential groundborne vibration impacts related to railroad and stationary sources would be less than significant; however, implementation of the Blueprint SD Initiative, Hillcrest FPA, and University CPU would have the potential to result in groundborne vibration impacts related to construction if pile driving is proposed within close proximity of structures. The Blueprint SD PEIR concluded that because specific construction techniques for future project development are not known at the program level of review, direct and cumulative impacts related to vibration during construction would be significant.

The Blueprint SD PEIR included mitigation for future development projects that include pile driving that would exceed allowable vibration levels. Such future projects would be required to implement Blueprint SD PEIR MM-NOI-2, which would require the implementation of vibration reduction measures to minimize construction-related vibration impacts that have the potential to exceed FTA criteria for architectural damage, as detailed in Blueprint SD PEIR Table 4.11-2. However, even with implementation of MM-NOI-2, significant construction vibration-related impacts may still occur because the project-specific construction techniques, locations of construction activities, and location of vibration sensitive land uses are not known at this time. Therefore, the Blueprint SD PEIR concluded that direct and cumulative construction-related vibration impacts would be significant and unavoidable.

College Area CPU

The College Area CPU would facilitate new development concentrated near transit facilities, including along the MTS Green Line Trolley corridor that traverses the northern portion of the College Area CPU area. As such, future development in the College Area CPU area may be exposed to existing or future vibration associated with trolley operations; however, this would not be considered an impact of the project under CEQA. Additionally, implementation of the College Area CPU does not involve rail or trolley improvements. Therefore, groundborne vibration impacts associated with rail operations resulting from project implementation would be less than significant, and the project would not result in new significant impacts or a substantial increase in the severity of previously identified impacts.

Regarding stationary vibration sources, these are generally associated with industrial manufacturing uses that utilize equipment or processes that have a potential to generate groundborne vibration. The College Area CPU land use plan does not include industrial uses, and proposes only residential, commercial, mixed-use, and civic and institutional uses. These uses do not typically generate vibration. Therefore, implementation of the College Area CPU would not result in vibration impacts from stationary sources. Groundborne vibration associated with stationary sources would be less than significant, and the project would not result in new significant impacts or a substantial increase in the severity of previously identified impacts.

Construction activities associated with future development within the College Area CPU area may include the demolition of existing structures, site preparation work, excavation of parking and subfloors, foundation work, and building construction. Demolition for an individual site may last several weeks to months and may produce substantial vibration, depending on the equipment used. Excavation for underground levels could also occur on some development sites, and vibratory pile driving could be used. Piles or drilled caissons may also be used to support building foundations.

Vibration levels during any construction phase may at times be perceptible. However, non-pile driving or foundation work construction phases that have the highest potential of producing vibration (such as jackhammering and other high-power tools) would be intermittent and would only occur for short periods of time for any individual development site. By use of administrative controls, such as scheduling construction activities with the highest potential to produce perceptible vibration to hours with the least potential to affect nearby properties, perceptible vibration can be kept to a minimum. Pile driving has the potential to generate the highest groundborne vibration levels and is the primary concern for structural damage when it occurs within close proximity of structures. Vibration generated by construction equipment has the potential to be substantial, since it has the potential to exceed the FTA criteria for architectural damage (e.g., 0.12 PPV for fragile or historical resources, 0.2 PPV for non-engineered timber and masonry buildings, and 0.3 PPV for engineered concrete and masonry). Construction details and equipment for future project-level development is not known at this time. Therefore, at a program level of review, impacts related to vibration during construction would be significant, and the project would not result in new significant impacts or a substantial increase in the severity of previously identified impacts.

Future site-specific development projects implemented under the College Area CPU that would include pile driving and would exceed applicable vibration levels would be required to implement Blueprint SD PEIR MM-NOI-2. Although implementation of Blueprint SD PEIR MM-NOI-2 would reduce potential construction vibration-related impacts, significant construction vibration-related impacts may still occur because the project-specific construction techniques, locations of construction activities, and location of vibration sensitive land uses are not known at this time. Impacts would be significant and unavoidable. Therefore, the proposed project is consistent with the impact conclusions identified in the Blueprint SD PEIR for vibration impacts from construction activities, and would not result in new significant impacts or a substantial increase in the severity of previously identified impacts.

V.11.3 Conclusion

Based on the foregoing analysis and information, there is no evidence that the College Area CPU would require a major change to the Blueprint SD PEIR relative to noise. The Blueprint SD PEIR concluded that noise impacts related to ambient noise increases associated with construction activities, non-transportation noise sources, and transportation noise would be significant, even after implementation of Blueprint SD PEIR MM-NOI-1. Similarly, future discretionary development projects consistent with the College Area CPU would be required to implement Blueprint SD PEIR MM-NOI-1; however, impacts would remain significant. The Blueprint SD PEIR concluded that groundborne vibration impacts from future construction activities involving pile driving would be significant, even after implementation of Blueprint SD PEIR MM NOI-2. Similarly, future discretionary development projects consistent with the College Area CPU that would involve pile driving and would exceed applicable vibration levels would implement Blueprint SD PEIR MM-NOI-2; however,

impacts would remain significant. The Blueprint SD PEIR concluded groundborne vibration impacts associated with railroad and stationary sources were less than significant and no mitigation was identified. Likewise, railroad and stationary sources-associated vibration impacts resulting from future development projects consistent with the College Area CPU would be less than significant. The College Area CPU would not result in any new significant noise impacts, nor would it result in a substantial increase in the severity of noise impacts from those described in the Blueprint SD PEIR.

V.12 Public Services

V.12.1 Public Facilities

Blueprint SD PEIR

Public services impacts related to public facilities are evaluated in Section 4.12.4 (Issue 1) of the Blueprint SD PEIR.

The Blueprint SD PEIR concluded that implementation of the Blueprint SD Initiative, Hillcrest FPA, and University CPU could result in the need for additional fire-rescue, police, school, and library facilities. As the location and need for potential future facilities could not be determined at the program level of review, the Blueprint SD PEIR determined it was unknown what specific impacts, and the extent of the impacts, could occur associated with the future construction and operation of such facilities. Future public services facilities projects would require a separate environmental review and compliance with regulations in existence at the time as well as any additional project-specific mitigation measures would reduce potential environmental impacts related to the construction and operation of these public services facilities. However, as it could not be ensured that all impacts associated with the construction and operation of potential future public services facilities would be mitigated to less than significant, the Blueprint SD PEIR concluded direct and cumulative impacts would be significant. The Blueprint SD PEIR concluded that at a program level of review, no feasible mitigation is available to reduce impacts and thus, direct and cumulative impacts would be significant and unavoidable.

College Area CPU

Fire Protection

The College Area CPU area is served by three fire stations in neighboring communities, including Station 10 in the Rolando Village neighborhood, Station 17 in the Teralta East neighborhood in City Heights, and Station 31 in the Del Cerro neighborhood, as depicted in Figure 12, *Public Facilities*. Two fire-fighting helicopters are also available at Montgomery Field for brush fire response. The College Area CPU identifies two potential fire stations located near SDSU and near El Cajon Boulevard and 70th Street, however no new or improved fire stations are proposed as part of the College Area CPU. The College Area CPU includes policies that address the provision of fire-rescue services within the community, including Policy 8.20, which calls for evaluating potential upgrades, expansions and new fire stations and equipment to maintain adequate service; and Policy 8.21, which calls for maintaining and evaluating sufficient fire-rescue services to serve the College Area, particularly in areas adjacent to open space canyons and hillsides.

The College Area CPU would result in a potential buildout of an additional approximately 25,950 residential units over existing conditions. The increase in residential development and associated demand for fire protection services could require the provision of new and/or improved fire stations and fire apparatus to maintain fire-rescue service ratios, response times, and other performance objectives, although actual needs and potential locations would be determined in the future as development occurs. The construction and operation of new and/or improved fire stations in the future could result in environmental impacts, including but not limited to, disturbances or conversion of habitat, water pollution during construction, increased noise levels, and an increase in impermeable surfaces. At the time future fire stations are proposed, they would require a separate environmental review and compliance with regulations in existence at that time as well as any additional project-specific mitigation measures would reduce potential environmental impacts related to the construction and operation of new and/or improved fire stations. However, as the location and need for potential future fire stations cannot be determined at this time, it is unknown what specific impacts may occur or the extent of these impacts. Thus, it cannot be ensured that all impacts associated with the construction and operation of potential future fire protection facilities would be mitigated to less than significant. No feasible mitigation measures are available at this time as the specific impacts and extent of impacts from future site-specific projects are unknown. Impacts would be significant and unavoidable. Therefore, the proposed project is consistent with the impact conclusions identified in the Blueprint SD PEIR for public services impacts related to fire protection, and would not result in new significant impacts or a substantial increase in the severity of previously identified impacts.

Police Protection

The College Area CPU area is served by the eastern division substation and in part by the SDSU Police Department, which is responsible for public safety on the campus and who work closely with the San Diego Police Department in monitoring off-campus student activities. As depicted in Figure 12, *Public Facilities*, no new or improved police stations are proposed as part of the College Area CPU. However, the College Area CPU includes policies which address the provision of police services within the community, including Policy 8.16 which calls for continuing to support police services that serve the community as the community grows, and Policy 8.18, which calls for maintaining and evaluating the need for additional police services such as Community Service Officer programs and police storefronts in villages.

Buildout of the College Area CPU would increase residential development and associated demand for police services in the CPU area, which could result in the need for additional police stations or related facilities to maintain police service ratios, response times, and other performance objectives, although actual needs and potential locations would be determined in the future as development occurs. The construction and operation of new and/or improved police facilities in the future could result in environmental impacts, including but not limited to, disturbances or conversion of habitat, water pollution during construction, increased noise levels, and an increase in impermeable surfaces. At the time future police station projects are proposed, they would require a separate environmental review and compliance with regulations in existence at that time as well as any additional project-specific mitigation measures would reduce potential environmental impacts related to the construction and operation of these police stations. However, as the location and need for potential future police stations cannot be determined at this time, it is unknown what

specific impacts may occur or the extent of these impacts. Thus, it cannot be ensured that all impacts associated with the construction and operation of potential future police facilities would be mitigated to a less than significant level. No feasible mitigation measures are available at this time as the specific impacts and extent of impacts from future site-specific projects are unknown. Impacts would be significant and unavoidable. Therefore, the proposed project is consistent with the impact conclusions identified in the Blueprint SD PEIR for public services impacts related to police protection, and would not result in new significant impacts or a substantial increase in the severity of previously identified impacts.

Schools

The College Area CPU area is served by the San Diego Unified School District (SDUSD). There are three SDUSD schools located within the CPU area (Hardy Elementary, the Language Academy, and Harriet Tubman Village Charter), and six outside of the CPU area whose service boundaries include portions of the CPU area (Pendleton Elementary, Fay Elementary, Lewis Middle, Horace Mann Middle, Crawford High, and Patrick Henry High), as depicted in Figure 12, *Public Facilities*. Other schools in the CPU area include St. Katharine Drexel Academy, which is a private school, and the main campus of SDSU. No new or improved schools are proposed as part of the College Area CPU; however, the proposed CPU includes policies which support the provision of school facilities to serve the community. For example, Policy 8.9 calls on the City to coordinate with the San Diego Unified School District to site new schools, where feasible, to provide for future pre-kindergarten to 12th grade enrollment needs; and Policy 8.10 calls for pursuing joint use agreements to allow the use of school facilities during non-school hours for educational, civic, recreational, art and cultural purposes.

The anticipated buildout of the College Area CPU would result in the addition of approximately 25,950 residential units over existing conditions within the CPU area, which would generate additional students and could result in the need for additional school facilities. Government Code Sections 65995 and Education Code Section 17620 authorize school districts to impose facility mitigation fees on new development to address any increased enrollment that may result. SB 50 substantially revised developer fee and mitigation procedures for school facilities as set forth in Government Code Section 65996. The legislation provides that an acceptable method of offsetting a project's effect on the adequacy of school facilities is payment of a school impact fee prior to issuance of a building permit. Once paid, the school impact fees would serve as mitigation for project-related impacts to school facilities. As such, the City is legally prohibited from imposing additional mitigation related to school facilities, as payment of the school impact fees constitutes full and complete mitigation. Pursuant to these state laws, the school district is the authorized agency to collect mitigation fees to be used for school facilities and is responsible for any potential expansion of existing and/or development of new school facilities. This process is outside the jurisdiction of the City and therefore cannot be used as mitigation for this project.

While the payment of fees would provide funding for school districts to address future school capacity needs, the potential increase in students from implementation of the College Area CPU could impact the capacity of existing schools and could require the construction of new and/or improved school facilities. Future school projects would be required to undergo project-specific environmental review at which time environmental impacts would be identified and addressed and potential project features and/or project-specific mitigation measures would be proposed. However,

as the location and need for potential future schools cannot be determined at this time, it is unknown what specific impacts may occur or the extent of these impacts. While SDUSD and the SDSU Board of Trustees would be responsible for the potential expansion of existing and/or development of new school facilities within the College Area CPU area, potential physical impacts associated with the construction and operation of future school sites are not known at this time. Thus, it cannot be ensured that impacts associated with the construction and operation of future schools would be mitigated to a less than significant level. No feasible mitigation measures are available at this time as the specific impacts and extent of impacts from future site-specific projects are unknown. Impacts would be significant and unavoidable. Therefore, the proposed project is consistent with the impact conclusions identified in the Blueprint SD PEIR for public services impacts related to schools, and would not result in new significant impacts or a substantial increase in the severity of previously identified impacts.

Libraries

Library services within the College Area CPU area are provided by the College-Rolando Branch Library of the City's Public Library system, as depicted in Figure 12, *Public Facilities*. No new or improved libraries are proposed as part of the College Area CPU. However, the proposed CPU includes policies which address potential improvements to the College-Rolando Library, including Policy 8.12 which calls for the consideration of service improvements at the College-Rolando Library such as extended hours, expanded book collection, and additional staff to provide special programs; Policy 8.13 which supports improvements to the College-Rolando Library to address future needs; and Policy 8.14 which calls on the City to explore options for additional parking at the College-Rolando Library, including shared parking agreements and strategies to increase parking along Reservoir Drive and Mohawk Street.

The College Area CPU area is located in Zone E (Southeastern) of the City's Library Master Plan (City 2023). The Library Master Plan recommends the provision of an additional 140,000 to 155,00 square feet of branch library space in Zone E through the replacement and expansion of existing branches (Oak Park, Paradise Hills, Kensington-Normal Heights, and Mountain View/Beckwourth); however, only maintenance is recommended for the College-Rolando branch.

Buildout of the College Area CPU would result in an additional approximately 25,950 residential units, which could increase demand for library services. Future library facility projects would be subject to a separate environmental review and compliance with the regulations existing at the time as well as additional project-specific mitigation measures would reduce potential environmental impacts associated with construction and operation of these library facilities. However, the specific impacts and extent of these impacts associated with the construction and operation of future library facilities are unknown at this time. Thus, it cannot be ensured that impacts associated with the construction and operation of future library facilities would be mitigated to a less than significant level. No feasible mitigation measures are available at this time as the specific impacts and extent of impacts from future site-specific projects are unknown. Impacts would be significant and unavoidable. Therefore, the proposed project is consistent with the impact conclusions identified in the Blueprint SD PEIR for public services impacts related to libraries and would not result in new significant impacts or a substantial increase in the severity of previously identified impacts.

V.12.2 Conclusion

Based on the foregoing analysis and information, there is no evidence that the College Area CPU would require a major change to the Blueprint SD PEIR related to public services. The Blueprint SD PEIR concluded that impacts associated with public services and facilities, including fire-rescue, police protection, schools, and libraries would be significant and unavoidable because it is not possible to ensure future impacts could be fully mitigated to less than significant at a program level. No mitigation was identified in the Blueprint SD PEIR. The proposed project would result in similar impacts to public services given the program level of review for the College Area CPU. As such, the project would result in significant and unavoidable public services impacts related to fire-rescue, police protection, schools, and libraries. The College Area CPU would not result in any new significant impacts related to public services, nor would it result in a substantial increase in the severity of impacts related to public services from those described in the Blueprint SD PEIR.

V.13 Recreation

V.13.1 Deterioration of Parks and Recreational Facilities

Blueprint SD PEIR

Recreation impacts related to the deterioration of parks and recreational facilities are evaluated in Section 4.13.4 (Issue 1) of the Blueprint SD PEIR.

The Blueprint SD PEIR determined that implementation of the Blueprint SD Initiative, Hillcrest FPA, and University CPU could result in an increase in the use of existing neighborhood and regional parks and other recreational facilities which could result in the deterioration of these facilities.

The Blueprint SD Initiative includes a policy framework that supports the maintenance and provision of new parks and recreational facilities. The Blueprint SD PEIR noted that future CPUs, Specific Plans, and FPAs that are implemented in accordance with Blueprint SD could identify potential recreational opportunities and provide regulations and policies which support and facilitate the development of parks and recreational facilities. While the development of future recreational amenities could offset the potential increased use of existing recreational facilities, the Blueprint SD PEIR determined it is unknown where these future improvements would be located, the specific impacts and the extent of impacts that could result from providing these facilities, and to what extent these future facilities would be able to accommodate increases in demand for recreational facilities. Thus, the Blueprint SD PEIR concluded that because it could not be ensured that all future impacts would be mitigated to a less than significant level, direct and cumulative impacts would be significant and unavoidable. No feasible mitigation measures were identified in the Blueprint SD PEIR.

College Area CPU

Existing public parks and recreation facilities within the College Area CPU area include one neighborhood park (Montezuma Park) and three joint-use parks (Hardy Elementary, Language Academy, and Harriet Tubman Charter Schools). The SDSU campus has recreation facilities that are free to students, and faculty/staff may purchase recreation memberships or passes. There is also a

private park located in the Alvarado Estates neighborhood of the CPU area. Buildout of the College Area CPU would result in increased development due to higher density residential and mixed-use village uses. The growth associated with these future developments could result in an increase in the use of existing neighborhood parks and other recreational facilities, potentially resulting in the physical deterioration of these facilities.

The College Area CPU identifies potential new parks and recreational facilities, including the 62nd Street Mini Park, Alvarado Creek Neighborhood Park, Brockbank Place Overlook Pocket Park, Saranac Alley Pocket Park, Adams-Baja Trail and Trailhead Pocket Park, Pocket Park at 54th Street, and Montezuma Road Public Space. The CPU proposes a new recreation center along or within proximity to College Avenue; however, a site-specific location has not been identified. Similarly, an opportunity for an overlook along College Avenue is identified in the College Area CPU; however, a site-specific location has not been identified. Future opportunities for recreation centers and aquatic complexes will be evaluated as current leases on City-owned land expire, and as sites and funding become available. The existing and proposed parks and recreation facilities are depicted in Figure 9, *Parks*.

The proposed CPU also includes a regulatory and policy framework which would facilitate the development of parks and recreational facilities in the CPU area. Future development within the CPU's CEOZ boundaries would be required to comply with the development regulations in SDMC Section 132.1601 et seq. which require new development to provide public spaces such as plazas, urban greens, podiums, greenways, and paseos and associated amenities. New development within specific areas of the CPU's CEOZ areas would also be required to provide greenways and parkways in accordance with SDMC Sections 132.1620 and 132.1625.

Policies within the CPU Recreation Element that support the development of parks and recreational facilities include, but are not limited to, Policy 6.1 which calls for pursuing the implementation of the planned park sites and improvements to existing parks; Policy 6.2 which calls for pursuing land acquisition for the creation of new public parks, recreation facilities and creative spaces, cultural facilities and other public spaces as opportunities arise; Policy 6.3 which encourages the implementation of recreation centers and aquatic centers to serve the community; Policy 6.4 which calls for pursuing opportunities to develop mini or pocket parks, plazas, and recreation facilities as part of future developments with visual and physical access from one or more street frontages whenever feasible; and Policy 6.6 which calls for pursuing opportunities for new parks and recreation facilities through partnerships and joint-use agreements.

The development of future parks and recreational facilities within the College Area CPU area that could occur in accordance with the proposed CPU could offset the potential increased use of existing parks and recreational facilities and their associated deterioration; however, it is unknown to what extent these potential future facilities would be able to accommodate increases in demand for parks and recreational facilities as the population grows. As future development is proposed, individual private developments would be required to either pay citywide park fees or provide public parks consistent with SDMC Section 142.0640(b)(8)(A-F). New development within the CPU's CEOZ areas would also be required to provide public spaces, greenways, and/or parkways pursuant to SDMC Section 132.1601 et seq. These public spaces can include recreational elements and provide additional opportunities for passive and active recreation in the community. However, despite compliance with the City's regulatory framework that requires individual developments to support

funding for or construction of public park facilities, the additional growth that could occur within the College Area CPU area could increase the use and deterioration of existing recreational facilities. Thus, impacts would be potentially significant. No feasible mitigation measures beyond required regulatory compliance with the Parks Master Plan standards and SDMC development regulations are available at this time. Impacts would be significant and unavoidable. Therefore, the proposed project is consistent with the impact conclusions identified in the Blueprint SD PEIR for recreation impacts related to deterioration of parks and recreational facilities and would not result in new significant impacts or a substantial increase in the severity of previously identified impacts.

V.13.2 Construction or Expansion of Recreational Facilities

Blueprint SD PEIR

Recreation impacts related to the construction or expansion of recreational facilities are evaluated in Section 4.13.4 (Issue 2) of the Blueprint SD PEIR.

The Blueprint SD PEIR concluded that implementation of the Blueprint SD Initiative, Hillcrest FPA, and University CPU could require the construction and/or expansion of parks and recreational facilities. While compliance with the regulations in existence at that time future individual projects are proposed as well as any additional project-specific mitigation measures would address potential environmental impacts related to the construction and operation of future parks and recreational facilities, the Blueprint SD PEIR determined it is unknown where specific future developments would be located and what the specific environmental impacts and extent of impacts may be associated with providing these facilities. The Blueprint SD PEIR concluded that as it cannot be ensured that all impacts associated with the construction and operation of potential future parks and recreational facilities would be mitigated to less than significant, direct and cumulative impacts would be significant and unavoidable. No feasible mitigation measures were identified in the Blueprint SD PEIR.

College Area CPU

Buildout of the College Area CPU would result in increased development due to higher density residential and mixed-use village uses. Population growth associated with future developments could result in an increase of up to an additional approximately 53,540 people, for an estimated total population of approximately 73,940 at buildout. The growth associated with these future developments could result in the need for the construction of new, or expansion of existing, parks and recreational facilities. Based on a population of approximately 73,940 people, the following population-based parks and recreation facilities are needed in the College Area CPU area based on the City's Parks Master Plan (City 2021) standards:

- Parks and recreational facilities totaling approximately 7,394 recreational value points based on the Parks Master Plan standard of 100 Recreation Value-Base points per 1,000 residents.
- Approximately 3 recreation centers totaling approximately 50,400 square feet of recreation center building space based on the Parks Master Plan standard of 17,000 square feet per 25,000 residents.
- Approximately two aquatic complexes based on the Parks Master Plan standard of one

aquatic complex per 50,000 residents.

The total current recreation value points for existing parks and recreational facilities in the College Area community is 917 points. The College Area CPU identifies opportunities for several new park and recreational facilities, as well as improvements to existing park and recreational facilities, to help achieve these standards. The existing and proposed parks and recreation facilities are depicted in Figure 9, *Parks*. Identified new facilities include the 62nd Street Mini Park, Alvarado Creek Neighborhood Park, Brockbank Place Overlook Park, Saranac Alley Pocket Park, Adams-Baja Trail and Trailhead Pocket Park, Pocket Park at 54th Street, and Montezuma Road Public Space. The CPU proposes a new recreation center along or within proximity to College Avenue; however, a site-specific location has not been identified. Similarly, an opportunity for an overlook along College Avenue was identified in the College Area CPU; however, a site-specific location has not been identified. The CPU also identifies potential improvements to Montezuma Mini Park. The CPU's Recreation Element contains several policies to support improvements to existing parks and identifies opportunities for new park facilities. Of note are Policy 6.1 which calls for pursuing the implementation of the planned park sites and improvements to existing parks; Policy 6.2 which calls for pursuing land acquisition for the creation of new public parks, recreation facilities and creative spaces, cultural facilities and other public spaces as opportunities arise; and Policy 6.3 which encourages the implementation of recreation centers and aquatic centers to serve the community.

The College Area CPU also includes a regulatory and policy framework which would facilitate the development of parks and recreational facilities in the CPU area. As discussed above in Section V.13.1, future development within the CPU's CEOZ boundaries would be required to comply with the development regulations contained in SDMC Section 132.1601 et seq. that require the development of public spaces such as plazas, urban greens, podiums, greenways, and paseos and associated amenities in certain areas of the community. New development within specific areas of the CPU's CEOZ areas would also be required to provide greenways and parkways in accordance with SDMC Sections 132.1620 and 132.1625. As future development is proposed, individual private developments would be required to either pay citywide park fees or provide public parks consistent with SDMC Section 142.0640(b)(8)(A-F). Additionally, the proposed CPU includes policies which encourage the development of new recreational opportunities along transit corridors. For example, Policy 6.8 calls for supporting the development of the Montezuma Road public space with an expanded parkway and recreational features within the greenway, and Policy 6.9 calls for increasing recreational opportunities to provide for park and recreation uses by reconfiguring streets, where feasible.

The College Area CPU does not propose the implementation of any specific parks or recreational facility projects at this time; however, future development that occurs in accordance with the College Area CPU could result in the construction and/or expansion of new or existing parks and recreational facilities within the community. The construction and operation of new and/or expanded parks and recreational facilities could result in environmental impacts, including but not limited to, disturbances or conversion of habitat, water pollution during construction, increased noise levels, and an increase in impermeable surfaces. At the time future site-specific parks and recreational facility projects are proposed, they would require a separate environmental review and compliance with regulations in existence at that time as well as any additional project-specific mitigation measures would reduce potential environmental impacts related to the construction and operation of these parks and recreational facilities.

However, as the location of potential future parks and recreational facilities cannot be determined at this time, it is unknown what specific impacts may occur and the extent of these impacts. Thus, as it cannot be ensured that all impacts associated with the construction and operation of potential future parks and recreational facilities would be mitigated to a less than significant level, impacts would be significant and unavoidable. Therefore, the proposed project is consistent with the impact conclusions identified in the Blueprint SD PEIR for recreation impacts related to construction or expansion of new or existing recreational facilities and would not result in new significant impacts or a substantial increase in the severity of previously identified impacts.

V.13.3 Conclusion

Based on the foregoing analysis and information, there is no evidence that the College Area CPU would require a major change to the Blueprint SD PEIR related to recreation. The Blueprint SD PEIR concluded that recreation impacts related to deterioration of parks and recreational facilities and construction or expansion of recreational facilities would be significant and unavoidable because it is not possible to ensure future site-specific impacts could be fully mitigated to less than significant at a program level without site-specific project details. No mitigation was identified in the Blueprint SD PEIR. The proposed project would result in similar impacts related to recreation given the program level of review for the College Area CPU. As such, the project would result in significant and unavoidable recreation impacts related to deterioration of parks and recreational facilities and construction or expansion of recreational facilities. The College Area CPU would not result in any new significant recreation impacts, nor would it result in a substantial increase in the severity of recreation impacts from those described in the Blueprint SD PEIR.

V.14 Transportation

V.14.1 Transportation Policy Consistency

Blueprint SD PEIR

Transportation impacts related to transportation policy consistency are evaluated in Section 4.14.4 (Issue 1) of the Blueprint SD PEIR.

The Blueprint SD PEIR concluded that the Blueprint SD Initiative, Hillcrest FPA, and University CPU would support improved pedestrian, bicycle, and transit facilities and foster increased safety for alternative transportation modes by facilitating higher density development within areas close to existing and planned transit. Additionally, the Blueprint SD PEIR noted that the Blueprint SD Initiative, Hillcrest FPA, and University CPU provides policies that support improvements to pedestrian, bicycle, transit, and roadway facilities while reducing per capita VMT and increasing alternative mode share. Thus, the Blueprint SD PEIR concluded the Blueprint SD Initiative, Hillcrest FPA, and University CPU would not conflict with an adopted program, plan, ordinance, or policy addressing the transportation system, including transit, roadways, bicycle and pedestrian facilities, and direct and cumulative impacts would be less than significant.

College Area CPU

The College Area CPU would not conflict with applicable adopted transportation policies, plans, and programs including those supporting transit, bicycle, and pedestrian facilities. The proposed CPU would allow for an increase in residential and mixed-use village development near existing transit facilities and along transit corridors, consistent with the planned regional transportation network in SANDAG's 2021 Regional Plan-Amendment 2023 (SANDAG 2021) (see Figure 8, *Planned Transit Network*). The Village Climate Goal Propensity Map, which was developed with the regional transportation network in mind, provides a framework for directing land uses within areas that would align with existing and planned transit infrastructure. The overall goal is to increase opportunities for homes and jobs in locations that would cause a shift in mode share from single occupancy vehicles to walking/rolling, bicycling, and transit use as planned transit infrastructure is implemented. The land use framework provided in the College Area CPU would help achieve an overall goal of reducing citywide VMT per capita that is consistent with and supportive of the goals of the City's General Plan, CAP, and the 2021 Regional Plan, because it supports transit-oriented, mixed-use development. Within the College Area CPU area, increases in density are consistent with the land use framework identified in the Village Climate Goal Propensity Map, and are located near existing or planned transit infrastructure to support shifts in mode share and reductions in VMT per capita.

The College Area CPU is consistent with adopted policies, plans, and programs supporting the transportation system, as it includes policies that support improvements to pedestrian, bicycle, transit, and roadway facilities while reducing VMT per capita and increasing alternative mode share. These planned and proposed alternative mobility improvements are depicted in Figure 5, *Planned Pedestrian Network*, Figure 6, *Planned Bicycle Network*, and Figure 8, *Planned Transit Network*. Policies within the College Area CPU that would align with policies in the General Plan, the City's CAP, and the 2021 Regional Plan include, but are not limited to:

- Policy 3.1: Prioritize raised crosswalks, raised median pedestrian refuges, rectangular rapid flashing beacons, curb extensions, signal timing, and other pedestrian improvements along thoroughfares as applicable.
- Policy 3.2: Promote mobility improvements that support walking and rolling to everyday needs such as supermarkets, pharmacies, schools, parks, and other neighborhood-serving destinations.
- Policy 3.3: Incorporate planned bikeways as streets are resurfaced or improved.
- Policy 3.4: Prioritize separated bikeways where feasible.
- Policy 3.5: Prioritize enhanced features that improve visibility and physical separation from vehicles along bikeways and at intersections.
- Policy 3.6: Encourage bicycle amenities at transit stations, mobility hubs, new developments, commercial centers, employment hubs, schools and parks.
- Policy 3.7: Support the reconfiguration of El Cajon Boulevard and College Avenue to accommodate transit lanes, peak period transit lanes or shared bus-bike lanes to improve transit reliability and efficiency, in coordination with the Metropolitan Transit System.
- Policy 3.8: Integrate transit priority features to further improve operational efficiency along thoroughfares where feasible.
- Policy 3.9: Support first- and last-mile connections to and from transit stations that support

safety, comfort, connectivity and accessibility.

- Policy 3.10: Support implementation of the planned street classifications as part of resurfacing and improvement projects.
- Policy 3.19: Coordinate with Caltrans and SANDAG to improve pedestrian and bicycle connections through I-8 interchanges at Fairmount Avenue, College Avenue and 70th Street.
- Policy 3.20: Upgrade traffic signals to facilitate traffic signal coordination, transit priority and adaptive coordination along corridors and adjacent to and serving San Diego State University to facilitate traffic management around the campus especially during special events.

Based on the above, the College Area CPU would support citywide and regional programs, plans, ordinances, or policies addressing the transportation system, including transit, roadways, bicycle and pedestrian facilities. Impacts would be less than significant. Therefore, the proposed project is consistent with the impact conclusions identified in the Blueprint SD PEIR for transportation impacts related to transportation policy consistency and would not result in new significant impacts or a substantial increase in the severity of previously identified impacts.

V.14.2 Vehicle Miles Traveled

Blueprint SD PEIR

Transportation impacts related to VMT are evaluated in Section 4.14.4 (Issue 2) of the Blueprint SD PEIR.

The Blueprint SD PEIR concluded that the Blueprint SD Initiative, Hillcrest FPA, and University CPU would have a significant VMT impact at the program level due to residential, employment, and retail VMT exceeding 85 percent of the base year regional mean. Although the model results show that VMT per capita (residents) for the Blueprint SD Initiative, Hillcrest FPA, and University CPU, and VMT per employee (employment) for the Blueprint SD Initiative and Hillcrest FPA would fall below the City's significance thresholds, these model results assume full implementation of the SANDAG 2021 Regional Plan transportation investments, which cannot be ensured. For the University CPU, even assuming full implementation of the SANDAG 2021 Regional Plan transportation investments, VMT per employee would be 85.3 percent of the regional mean, resulting in a significant VMT per employee impact under the University CPU. Overall, due to the fact that full completion of all the SANDAG 2021 Regional Plan transportation investments cannot be ensured, and future project-specific review is required in accordance with the City's Transportation Study Manual (TSM), at a program level of review, the Blueprint SD PEIR concluded direct and cumulative residential and employment VMT impacts would be significant for the Blueprint SD Initiative, Hillcrest FPA, and University CPU. The Blueprint SD PEIR concluded that direct and cumulative retail VMT impacts would be significant for the Blueprint SD Initiative and University CPU at the program level, but less than significant for the Hillcrest FPA because all retail would be locally serving due to size limitations imposed by the City's base zoning in this area.

The Blueprint SD PEIR includes mitigation measures for future development projects and future community plan updates. Blueprint SD PEIR MM-TRANS-1 requires future development to demonstrate compliance with the City's Mobility Choices Ordinance (SDMC Section 143.1103 et seq.)

and the City's TSM, including preparation of a VMT analysis and local mobility analysis, where applicable. Blueprint SD PEIR MM-TRANS-2 requires future community plan updates to demonstrate that future residential and nonresidential VMT levels are below the City's CEQA Significance Determination Thresholds on a citywide basis, with the full implementation of the SANDAG 2021 Regional Plan. The Blueprint SD PEIR concluded that VMT impacts would be significant even after implementation of Blueprint SD PEIR MM-TRANS-1 and Blueprint SD PEIR MM-TRANS-2 because: (1) it cannot be determined with certainty whether all future site-specific project level impacts could be reduced to below a level of significance, and (2) it cannot be guaranteed that full completion of all the SANDAG 2021 Regional Plan transportation investments will occur. Therefore, the Blueprint SD PEIR concluded that impacts associated with residential, employment, and retail VMT would be significant and unavoidable.

College Area CPU

The City prepared a VMT analysis for the project, which is included as Attachment 4 to this Addendum.

Residential and Employment VMT per Capita

Table 6 presents the College Area CPU's resident and employee VMT efficiency metrics for Base Year (2016) conditions, which is the best available data to represent existing conditions for VMT. Under Base Year conditions, the College Area CPU's VMT per Capita (Residents) is 83 percent and its VMT per Employee (Employment) is 84 percent, which are below the significance thresholds of 85 percent of the regional means for both VMT per Capita and VMT per Employee. Therefore, based on the City's CEQA Significance Determination Thresholds, the College Area CPU would be screened out from performing additional VMT analysis and is presumed to have a less than significant VMT impact for both residential and commercial employment land uses.

The College Area CPU would not substantially change the existing land use types, but would support additional capacity of the land uses already present in the community. It is assumed that additional development would retain the VMT efficiency the community is achieving in the base year and would become even more efficient as the multimodal improvements envisioned by the College Area CPU and SANDAG Regional Plan are implemented. The presumption of less than significant is supported by the Governor's Office of Land Use and Climate Innovation's (LCI's), formerly the Office of Planning and Research, SB 743 Technical Advisory and the City's TSM for projects located in VMT-efficient areas.

Table 6
Base Year VMT Metrics – College Area CPU

		2016 Base Year	
	2016 Regional Mean¹	College Area CPU Area Mean²	Percent of 2016 Regional Mean
VMT per Capita (Residents)	19.1	15.9	83%
VMT per Employee (Employment)	19.1	16.1	84%

¹ Source: SANDAG ABM 2+ RP 2021, 2016 Base Year Scenario, VMT Report Scenario ID 186

² Source: SANDAG ABM 2+ RP 2021, 2016 Base Year Scenario, TFIC SB 743 VMT Maps Scenario ID 458

See Attachment 4 for VMT Reports and SANDAG Traffic Forecast Information Center (TFIC) data

By 2050, with the implementation of the College Area CPU, the VMT efficiency substantially improves. Table 7 presents the College Area CPU resident and employee VMT for 2050 which is projected to have a VMT per Capita at 10.4 and a VMT per Employee at 9.2, which are 55 percent and 48 percent, respectively, of the Base Year regional means for both VMT per Capita and VMT per Employee. With full implementation of the SANDAG Regional Plan, VMT associated with the residential and employment land uses would not exceed the 85 percent thresholds at buildout of the College Area CPU and VMT impacts would be less than significant. However, consistent with the analysis in the Blueprint SD PEIR, at a program level of analysis, VMT impacts would be significant as it cannot be ensured that full implementation of the SANDAG Regional Plan's transportation investments will occur. Future discretionary projects in the College Area CPU area would be required to implement MM-TRANS-1 which reinforces required compliance with the City's Mobility Choices Ordinance (SDMC Section 143.1103 et seq.) and the City's TSM, including preparation of a VMT analysis and local mobility analysis, where applicable. Although compliance with the Mobility Choices Ordinance is anticipated to result in the implementation of infrastructure improvements that could result in reductions in VMT per Capita and VMT per Employee, at a program level of analysis, it cannot be determined with certainty whether implementation of the required improvements would be implemented at the time a future development project's VMT impacts could occur and whether those improvements would reduce VMT impacts to below a level of significance. Additionally, not all types of development are subject to the Mobility Choices Regulations as detailed in SDMC Section 143.1102. The College Area CPU, therefore, would not result in new significant impacts or a substantial increase in the severity of previously identified impacts compared to the Blueprint SD PEIR.

Table 7
College Area CPU Resident and Employee VMT Analysis

	2016 Regional Mean¹	2050 College Area CPU		
		College Area CPU Area Mean²	Percent of 2016 Regional Mean	Exceeds Threshold³ (Y/N)
VMT per Capita (Residents)	19.1	10.4	55%	NO
VMT per Employee (Employment)	19.1	9.2	48%	NO

¹ Source: SANDAG ABM 2+ RP 2021, 2016 Base Year Scenario, VMT Report Scenario ID 186

Table 7
College Area CPU Resident and Employee VMT Analysis

² Source: SANDAG ABM 2+, Blueprint Model Run 2 Scenario - SB 743 VMT Report, Scenario ID 320

³ Threshold is 85% of the 2016 Regional Mean VMT per Capita or VMT per Employee, respectively.

See Attachment 4 for VMT Reports

Retail VMT

While the metrics and thresholds in Table 3-1 of Attachment 4, Significance Thresholds for VMT Impacts, are appropriate for a project-level analysis, both LCI and the City recognize that for large land use plans such as the General Plan and community plans, proposed new residential, office and retail land uses should be considered in aggregate. In addition, it is not possible to isolate the component of VMT attributable solely to proposed retail land uses due to net regional VMT changes reflecting those caused by population and employment growth as well as proposed land use, transportation network, and policy changes. For retail land uses, it is more appropriate to identify VMT impacts and potential mitigation measures at the project level.

At this program level of analysis, it is anticipated that the proposed retail land uses in the College Area CPU would be locally serving as the base zones in the CPU area would limit the size of future retail establishments that could be developed per the College Area CPU and would not result in regionally-serving retail land uses. Therefore, the VMT impact due to retail development would be less than significant. Locally serving retail land uses are presumed to have a less than significant impact on VMT per LCI and the City's TSM.

In accordance with MM-TRANS-2, future community plan updates are required to demonstrate that future residential and nonresidential VMT levels are below the City's CEQA Significance Determination Thresholds on a Citywide basis with the full implementation of the SANDAG Regional Plan. The VMT analysis for the College Area CPU uses Model Run 2 of the Blueprint SD PEIR, as those land uses closely match the proposed density for the College Area CPU. Model Run 2 of the Blueprint SD PEIR assumes full implementation of the SANDAG Regional Plan's transportation improvements. Table 8, Citywide Resident and Employee VMT Analysis for the Blueprint SD PEIR Model Run 2 shows the Citywide VMT per Capita and VMT per Employee for Model Run 2.

Table 8
Citywide Resident and Employee VMT Analysis for the Blueprint SD PEIR Model Run 2

		2050 Blueprint SD Model Run 2		
	2016 Regional Mean ¹	Citywide Mean ²	Percent of 2016 Regional Mean	Exceeds Threshold ³ (Y/N)
VMT per Capita (Residents)	19.1	13.9	73%	NO
VMT per Employee (Employment)	19.1	13.8	72%	NO

¹ Source: SANDAG ABM 2+ RP 2021, 2016 Base Year Scenario, VMT Report Scenario ID 186

² Source: SANDAG ABM 2+, Blueprint Model Run 2 Scenario - SB 743 VMT Report, Scenario ID 320

³ Threshold is 85% of the 2016 Regional Mean VMT per Capita or VMT per Employee, respectively.

See Attachment 4 for VMT Reports

With full implementation of the SANDAG Regional Plan, VMT per Capita and VMT per Employee associated with the College Area CPU's residential and employment land uses would not exceed the 85 percent thresholds at buildout of the College Area CPU. As stated above, it is anticipated that the proposed retail land uses in the College Area CPU would be locally serving and therefore, the VMT impact due to retail development would be less than significant. Therefore, the City has implemented and satisfied the requirements of MM-TRANS-2, and the College Area CPU would not result in new significant impacts or a substantial increase in the severity of previously identified impacts compared to the Blueprint SD PEIR.

V.14.3 Design Features

Blueprint SD PEIR

Transportation impacts related to design features are evaluated in Section 4.14.4 (Issue 3) of the Blueprint SD PEIR.

The Blueprint SD PEIR noted that proposed improvements to roadways or transportation amenities would undergo review and approval by the City Engineer and would be subject to compliance with applicable City standards, including the City's Street Design Manual. As a result, the Blueprint SD PEIR determined that a substantial increase in hazards or incompatible uses would not occur from implementation of the Blueprint SD Initiative, Hillcrest FPA, and University CPU. As such, the Blueprint SD PEIR concluded direct and cumulative impacts would be less than significant.

College Area CPU

Individual development projects such as improvements to roadways or transportation amenities such as bicycle facilities implemented under the College Area CPU would be required to adhere to applicable federal, state, and City regulations and design criteria, which contain provisions to minimize roadway hazards. Compliance with these standards including, but not limited to, the City's LDC, Standard Drawings, and Street Design Manual to the satisfaction of the City Engineer would avoid impacts related to roadway hazards due to design features or incompatible uses. Furthermore, the College Area CPU identifies multi-modal transportation improvements, as depicted in Figure 5, *Planned Pedestrian Network* and Figure 6, *Planned Bicycle Network* and includes policies that are intended to improve safety for roadway users. These policies include, but are not limited to, Policy 3.1 which calls for prioritizing raised crosswalks, raised median pedestrian refuges, rectangular rapid flashing beacons, curb extensions, signal timing and other pedestrian improvements along thoroughfares as applicable; Policy 3.4 which calls for prioritizing separated bikeways where feasible; Policy 3.5 which calls for prioritizing enhanced features that improve visibility and the physical separation from vehicles along bikeways and at intersections; and Policy 3.11 which calls for supporting the implementation of 'Vision Zero' through traffic calming measures. The project does not propose incompatible uses that could increase hazards. Impacts related to hazardous design features would be less than significant. Therefore, the proposed project is consistent with the impact conclusions identified in the Blueprint SD PEIR for transportation impacts related to design features and would not result in new significant impacts or a substantial increase in the severity of previously identified impacts.

V.14.4 Emergency Access

Blueprint SD PEIR

Transportation impacts related to emergency access are evaluated in Section 4.14.4 (Issue 4) of the Blueprint SD PEIR.

The Blueprint SD PEIR concluded that throughout the City and beyond, there are generally adequate emergency evacuation routes through the major interstate system, local highways, and prime arterials, including within the Hillcrest FPA and University CPU areas. The Blueprint SD PEIR further determined that implementation of specific policies and roadway improvements within the Blueprint SD Initiative, Hillcrest FPA, and University CPU areas would have the potential to reduce traffic congestion and improve circulation efficiency thereby improving emergency access. Future development in accordance with the Blueprint SD Initiative, Hillcrest FPA, and University CPU would be required to comply with applicable City codes related to emergency access, including the City's Fire Code and the SDMC, would be reviewed for consistency with policies related to emergency access, and would be forwarded to the City Fire Marshall to ensure adequate emergency access. Through implementation of project-specific requirements for roadway improvements consistent with the Fire Code, TSM, and the SDMC, and adherence to City policies and regulations, the Blueprint SD PEIR concluded that direct and cumulative impacts associated with emergency access would be less than significant.

College Area CPU

At buildout, the College Area CPU would result in an overall community-wide increase of approximately 25,950 additional planned residential units over existing conditions. Emergency personnel and residents would use existing roadways with the proposed improvements identified in the College Area CPU and freeways for emergency access and emergency evacuation purposes. The primary transportation corridor that would serve as emergency access and emergency evacuation for the College Area CPU area would be I-8, which forms the northern boundary of the CPU area, and is accessible via Fairmount Avenue, College Avenue, and 70th Street. In addition to these vehicular transportation routes, the College Area CPU area has access to the MTS Green Line Trolley, which could facilitate emergency evacuation efforts. The highest intensity development in the College Area CPU area is focused around areas with transit access and access to major transportation corridors.

Implementation of the College Area CPU would improve circulation and mobility for all modes of travel throughout the CPU area, which would improve emergency access. For example, the College Area CPU proposes dedicated transit lanes on El Cajon Boulevard from 54th Street to Montezuma Road and along College Avenue from El Cajon Boulevard to Montezuma Road. Additionally, Montezuma Road from College Avenue to El Cajon Boulevard is proposed to be converted to a two-lane collector with two-way center left turn lane that can be utilized to facilitate emergency response when needed. These transit-only, shared bus-bike and/or two-way center left turn lanes as depicted in Figure 7, *Planned Street Classification* and Figure 8, *Planned Transit Network* can be utilized as-needed for emergency access, and would be available for emergency vehicles thereby improving emergency access in the CPU area. The College Area CPU also includes policies which support improvements to the mobility network to facilitate emergency access such as, but not limited to,

Policy 3.14 which supports new mobility connections that enhance circulation, especially to subdivisions that have only one route of ingress and egress; and Policy 3.20 which calls for upgrading traffic signals to facilitate traffic signal coordination, transit priority and adaptive coordination along corridors and adjacent to and serving San Diego State University to facilitate traffic management around the campus especially during special events. As these systems come online, they would further improve the efficiency of the transportation network.

Future individual development projects under the College Area CPU would additionally be required to comply with applicable City codes related to emergency access, including the City's Fire Code and the SDMC, would be reviewed for consistency with policies related to emergency access, and would be forwarded to the City Fire Marshall to ensure adequate emergency access. As future development consistent with the College Area CPU is proposed, the City would consider the adequacy of emergency access and emergency evacuation routes. Generally, the anticipated location of development would have ready access to transit and major transportation corridors. Based on the existing roadway network in place combined with improvements required by the City as development occurs and required consistency with City codes related to emergency access, impacts related to emergency access would be less than significant.

V.14.5 Conclusion

Based on the foregoing analysis and information, there is no evidence that the College Area CPU would require a major change to the Blueprint SD PEIR related to transportation. The Blueprint SD PEIR concluded transportation impacts related to transportation policy consistency, design feature, and emergency access would be less than significant, and no mitigation was required. Likewise, the project would not conflict with a program, plan, ordinance, or policy addressing the circulation system; substantially increase hazards due to a geometric design feature or incompatible use; or result in inadequate emergency access. With full implementation of the SANDAG Regional Plan, VMT per Capita and VMT per Employee associated with the project's residential and employment land uses would not exceed the 85 percent significance thresholds at buildout of the College Area CPU. Additionally, it is anticipated that the proposed retail land uses in the College Area CPU would be locally serving and therefore, the VMT impact due to retail development would be less than significant. Therefore, the project has implemented and satisfied the requirements of Blueprint SD PEIR MM-TRANS-2. However, consistent with the analysis in the Blueprint SD PEIR, at a program level of analysis, VMT impacts would be significant as it cannot be ensured that full implementation of the SANDAG Regional Plan's transportation investments will occur. Additionally, although compliance with the Mobility Choices Ordinance is anticipated to result in the implementation of infrastructure improvements that could result in VMT per Capita and VMT per Employee reductions, at a program level of analysis, it cannot be determined with certainty whether implementation of the required improvements would be implemented at the time a future development project's VMT impacts could occur and whether those improvements would reduce VMT impacts to below a level of significance. The College Area CPU would not result in any new significant transportation impacts, nor would it result in a substantial increase in the severity of transportation impacts from those described in the Blueprint SD PEIR.

V.15 Tribal Cultural Resources

V.15.1 Tribal Cultural Resources

Blueprint SD PEIR

Impacts related to tribal cultural resources are evaluated in Section 4.15.4 (Issue 1) of the Blueprint SD PEIR.

The Blueprint SD PEIR concluded that while compliance with existing regulations including the City's Historical Resources Regulations, Historical Resources Guidelines, and tribal consultation requirements, and implementation of applicable General Plan and community plan policies would provide for the protection of tribal cultural resources and would minimize potential impacts, it is not possible to ensure the successful preservation of all tribal cultural resources at a program level of review. Pursuant to SDMC Section 143.0260, a potential deviation from the City's Historical Resources Regulations may be considered if a proposed development cannot to the maximum extent feasible comply with the regulations so long as the decision maker makes the applicable findings in SDMC Section 126.0504. Given the potential that future development could request deviations under the Historical Resources Regulations, the Blueprint SD PEIR determined it cannot be ensured that all impacts to tribal cultural resources would be avoided or minimized and concluded direct and cumulative impacts would be significant.

In an effort to determine the potential for Tribal Cultural Resources to be impacted as a result of project implementation, Native American Tribes were engaged. Tribal consultation in accordance with SB 18 was initiated by the City in July 2021 for both the Blueprint SD Initiative (including the Hillcrest FPA) and the University CPU. The City received responses from three Tribes. On July 23, 2021, Ray Teran from the Viejas Band of Kumeyaay Indians provided comments on the project. The City of San Diego responded to the correspondence from the Viejas Band of Kumeyaay Indians on July 26, 2021. On August 13, 2021, Dennen Pelton from the Rincon Band of Luiseno Indians provided a response to the notice identifying the project as being outside of the Band's specific Area of Historic Interest. On April 10, 2024, Daniel Tsosie, the cultural resource manager from the Campo Band of Mission Indians requested consultation under SB 18 for the Blueprint SD Initiative. A consultation meeting was scheduled with the Mr. Tsosie on April 23, 2024 but was cancelled by the tribal representative. The consultation meeting was rescheduled to May 1, 2024, in which Mr. Tsosie began consultation with City staff regarding the Cultural Resources Sensitivity Maps and associated mitigation measure. Consultation with Mr. Tsosie was concluded on May 15, 2024, and the City made note of the recommendations.

On November 3, 2023, the City delivered AB 52 notifications for the Blueprint SD Initiative, including the Hillcrest FPA and the University CPU, to the Iipay Nation of Santa Ysabel, the Jamul Indian Village, the San Pasqual Band of Diegueno Mission Indians, and the Campo Band of Diegueno Mission Indians. Subsequent emails were delivered on November 17, 2023, November 20, 2023, and January 26, 2024. No responses were received from three of the Tribes. One request for consultation was received from Ms. Angelina Gutierrez from the San Pasqual Tribe of Mission Indians on November 6, 2023. The City responded to this request and contacted Ms. Gutierrez on November 13, 2023 and December 7, 2023 seeking to schedule an AB 52 consultation meeting, but did not receive a response.

The Blueprint SD PEIR includes mitigation that requires all discretionary development projects consistent with the Blueprint SD Initiative, Hillcrest FPA, and University CPU to implement Blueprint SD PEIR MM-HIST-2, which includes measures to minimize impacts to tribal cultural resources. Implementation of this mitigation measure, adherence to General Plan and applicable community plan policies promoting the protection of tribal cultural resources, and compliance with CEQA and PRC Section 21080.3.1 requiring the opportunity for tribal consultation and the City's Historical Resources Regulations which require review of all development projects which have the potential to impact historical resources would reduce the program-level impact related to tribal cultural resources. However, the Blueprint SD PEIR concluded that at the program level without project-specific development plans and the potential for deviations to be allowed, it cannot be ensured that all potential impacts to tribal cultural resources would be fully avoided or minimized. Direct and cumulative impacts would be significant and unavoidable.

College Area CPU

As part of the Cultural Resources Constraints and Sensitivity Analysis prepared for the project (HELIX 2025), the NAHC was contacted for a Sacred Lands File search for the College Area CPU area. The NAHC indicated that the search of the Sacred Lands File was completed with negative results. The NAHC also included a list of 17 local tribal representatives who may have additional information. Letters were sent to the Native American representatives identified by the NAHC, and one response was received from the San Pasqual Band of Diegueño Mission Indians requesting government-to-government consultation with the City. See Attachment 3 to the Addendum for additional details.

A request for tribal consultation in accordance with Senate Bill (SB) 18 was initiated by the City of San Diego on January 22, 2025, for the College Area CPU. The City received a response from one tribe, the Campo Band of Mission Indians. On January 22, 2025, Daniel Tsosie, the cultural resource manager from the Campo Band of Mission Indians acknowledged that he received the SB 18 90-day notice. No response was received from the San Pasqual Band of Diegueño Mission Indians tribe, who had previously requested consultation when contacted by Helix, as requested by the NAHC, during the preparation of the Cultural Resources Constraints and Sensitivity Analysis.

While most of the College Area CPU area is developed and it is anticipated that future development would occur within previously developed areas, the potential remains to encounter tribal cultural resources during construction of individual project sites, especially within areas that have been categorized as moderate sensitivity and in proximity to areas of known, recorded archaeological resources, which can also be tribal cultural resources as defined in CEQA (PRC Section 21074). As discussed in Section V.4, *Cultural Resources*, in this Addendum and detailed in the Cultural Resources Constraints and Sensitivity Analysis prepared for the project (HELIX 2025), a Cultural Resources Sensitivity map addressing the College Area CPU area was developed to identify the sensitivity of an area for containing cultural resources (see Figure 14). No areas within the College Area CPU study area are assessed as having a high archaeological resources sensitivity rating. A moderate sensitivity rating is generally applied to the undeveloped areas of the College Area CPU study area within canyons or larger drainages or where there appears to have been limited grading and deposit of fill, or where there may be a likelihood of buried historic archaeological resources to be present. The remainder of the College Area CPU is classified as low sensitivity as the soil that would have

contained archaeological resources, if they were present, was generally removed during construction. See Attachment 3 for additional details.

Similar to the process described in this Addendum under Cultural Resources, the City's Cultural Resources Sensitivity Map would be reviewed to determine the potential for tribal cultural resources to be impacted during construction associated with future development anticipated under the project. All development projects with the potential to affect historical resources, including tribal cultural resources, would be required to comply with the City's Historical Resources Regulations (SDMC Section 143.0201 et. seq.) and Historical Resources Guidelines, which require site-specific cultural surveys where warranted and implementation of measures to avoid or minimize impacts to the extent feasible.

The College Area CPU also contains policies addressing tribal cultural resources, and future discretionary projects with the potential to impact tribal cultural resources would be reviewed for consistency with the following Historic Preservation Element policies:

- Policy 9.1: Conduct project-specific Native American tribal consultation early in the development review process to ensure culturally appropriate and adequate treatment and mitigation for significant archaeological sites with cultural or religious significance to the Native American community in accordance with all applicable local, state, and federal regulations and guidelines.
- Policy 9.2: Conduct project specific investigations in accordance with all applicable laws and regulations to identify potentially significant tribal cultural and archaeological resources.
- Policy 9.3: Avoid adverse impacts to significant archaeological and tribal cultural resources identified within development project sites and implement measures to protect the resources from future disturbance to the extent feasible.
- Policy 9.4: Ensure measures are taken to minimize adverse impacts and are performed under the supervision of a qualified archaeologist and a Native American Kumeyaay monitor if archaeological and tribal cultural resources cannot be entirely avoided.
- Policy 9.5: Consider eligible for listing on the City's Historical Resources Register any significant archaeological or Native American tribal cultural sites that may be identified as part of future development within the College Area and refer sites for designation as appropriate.

While adherence to the existing regulations, such as the City's Historical Resources Regulations, Historical Resources Guidelines, tribal consultation requirements, and these CPU policies, and any project-specific mitigation would provide for the protection of tribal cultural resources, it cannot be ensured that all potential impacts to tribal cultural resources would be fully avoided or minimized at a program level. Individual discretionary projects implemented under the College Area CPU that could affect tribal cultural resources would be required to implement Blueprint SD PEIR MM-HIST-2, which includes measures to minimize impacts to tribal cultural resources. See Section VII in this Addendum for additional information. This mitigation, combined with adherence to the CPU policies described above and compliance with CEQA and PRC Section 21080.3.1 and the City's Historical Resources Regulations would reduce program-level impacts related to tribal cultural resources. However, even with application of the existing regulatory, policy, and mitigation frameworks, it

cannot be ensured that all potential impacts to tribal cultural resources would be fully avoided or minimized at a program level of review. Furthermore, pursuant to SDMC Section 143.0260, a potential deviation from the City's Historical Resources Regulations may be considered if a proposed development cannot to the maximum extent feasible comply with the regulations so long as the decision maker makes the applicable findings in SDMC Section 126.0504. Impacts to tribal cultural resources would be significant and unavoidable. Therefore, the proposed project is consistent with the impact conclusions identified in the Blueprint SD PEIR for tribal cultural resources, and would not result in new significant impacts or a substantial increase in the severity of previously identified impacts.

V.15.2 Conclusion

Based on the foregoing analysis and information, there is no evidence that the College Area CPU would require a major change to the Blueprint SD PEIR relative to tribal cultural resources. The Blueprint SD PEIR concluded that impacts to tribal cultural resources would be significant and unavoidable at the program level even with regulatory compliance and implementation of mitigation. Future development projects consistent with the College Area CPU that could potentially affect tribal cultural resources would implement Blueprint SD PEIR MM-HIST-2. As with the Blueprint SD PEIR, even with implementation of Blueprint SD PEIR MM-HIST-2, project impacts to tribal cultural resources would be significant and unavoidable. The College Area CPU would not result in any new significant impacts to tribal cultural resources, nor would it result in a substantial increase in the severity of impacts to tribal cultural resources from those described in the Blueprint SD PEIR.

V.16 Utilities and Service Systems

V.16.1 New or Expanded Facilities

Blueprint SD PEIR

Utility and service systems impacts related to new or expanded facilities are evaluated in Section 4.16.4 (Issue 1) of the Blueprint SD PEIR.

The Blueprint SD PEIR concluded that mandatory compliance with City standards for the design, construction, and operation of stormwater, water distribution, wastewater, electric power, natural gas, and communications systems infrastructure would likely minimize significant environmental impacts associated with the future construction of and/or improvements to utility infrastructure. At a project level of review, future development would consider the physical impacts of utility improvements and physical impacts would be minimized through required compliance with the City's ESL Regulations, Historical Resources Regulations, and other applicable LDC requirements, as well as additional project-specific mitigation measures. However, the Blueprint SD PEIR concluded at the program level of review and without project-specific development plans, direct and cumulative impacts associated with the construction of stormwater, water distribution, wastewater, electric power, natural gas, and communication systems would be significant. No feasible mitigation measures were identified in the Blueprint SD PEIR as the specific impacts and extent of impacts from future site-specific projects are unknown. Direct and cumulative impacts would be significant and unavoidable.

College Area CPU

Stormwater

The City's stormwater system is maintained by the City's Stormwater Department. Within the College Area CPU area, stormwater runoff is conveyed in a variety of directions through streets, gutters, cross gutters, gullies, open channels, and storm drain systems.

As discussed in this Addendum under Section V.9, Hydrology, and Section V.17, Water Quality, future development projects within the CPU area would have the potential to result in urban runoff. However, as development occurs, it is likely that the volume and rate of runoff could be decreased through compliance with the Regional MS4 Permit, Stormwater Standards Manual, JRMP, and SDMC requirements for stormwater management (collectively referred to as the "City Stormwater Regulations"). As new development occurs, implementation of LID BMP practices that help retain stormwater on-site for infiltration, re-use, or evaporation would be required per the City's Stormwater Standards Manual.

Future development occurring under the project could result in a need for the installation of new stormwater infrastructure. The need for new stormwater infrastructure would depend on the condition of existing infrastructure, development patterns, and development standards. The City assesses the condition of its stormwater facilities on a continuous basis. Additionally, the City's CIP program has established a scoring methodology to prioritize funding for infrastructure projects, including the construction of new stormwater infrastructure. All future projects consistent with the College Area CPU would be required to adhere to the SDMC, including compliance with the City Stormwater Regulations in place at the time future development is proposed.

As future development is implemented at the project level, each individual project would be required to evaluate the physical impacts of development, including impacts associated with new or expanded stormwater facilities. At a project level of review, physical impacts would be minimized through required compliance with the City's ESL Regulations, Historical Resources Regulations, and other applicable LDC requirements, as well as any additional project features and/or project-specific mitigation measures as determined by the City. Future discretionary projects would also be reviewed for consistency with all applicable College Area CPU policies, such as Urban Greening Policies 4.37 through 4.39, and Policy 4.42 which encourages considering green street improvements to reduce stormwater runoff. While it is expected that individual future development projects would be able to reduce potential impacts with compliance with the City's regulatory and policy frameworks as well as with any additional project features and/or project-specific mitigation measures, at a program level of review and without project-specific development plans, potential physical impacts and the extent of impacts associated with the future construction of stormwater facilities required to support future projects would be significant. No feasible mitigation measures are available at this time, as the specific impacts and extent of impacts from future site-specific projects are unknown at this time. Impacts would be significant and unavoidable. Therefore, the proposed project is consistent with the impact conclusions identified in the Blueprint SD PEIR relative to utilities and service systems associated with new or expanded stormwater facilities, and would not result in new significant impacts or a substantial increase in the severity of previously identified impacts.

Sewer

The City's Public Utilities Department (PUD) provides wastewater collection, treatment, reclamation, and disposal services to the City through its Metropolitan Sewerage System. The service area includes the City of San Diego, including the College Area CPU area, and 15 other cities and districts.

Sewer line upgrades are administered by the City's Engineering & Capital Projects (E&CP) Department and are handled on a project-by-project basis. No new sewer collection or wastewater treatment facilities are proposed in conjunction with the project. Likewise, the location and extent of future facilities would not be established until such time that individual projects are proposed. Future development would be required to follow the City's Sewer Design Guide and to comply with SDMC Chapter 6, Article 4 regulations regarding sewer and wastewater facilities. As future development is implemented at the project-level, consistent with the College Area CPU, each individual project would be required to evaluate the physical impacts of development, including impacts associated with new or expanded sewer facilities. At a project level of review, physical impacts would be minimized through required compliance with the City's ESL Regulations, Historical Resources Regulations, and other applicable LDC requirements, as well as any additional project features and/or project-specific mitigation measures as determined by the City. Future discretionary projects would also be reviewed for consistency with all applicable College Area CPU policies such as Policy 8.7 which calls for designing public utility facilities to blend into the design of the nearby building. While it is expected that individual future development projects would be able to reduce the potential impacts associated with providing new or expanded sewer facilities with compliance with the City's regulatory and policy frameworks as well as with any additional project features and/or project-specific mitigation measures, at a program level of review, and without project-specific development plans, potential physical impacts and the extent of these impacts associated with potential sewer facility upgrades required to support future projects are unknown. No feasible mitigation measures are available at this time, as the specific impacts and extent of impacts from future site-specific projects are unknown at this time. Impacts would be significant and unavoidable. Therefore, the proposed project is consistent with the impact conclusions identified in the Blueprint SD PEIR relative to utilities and service systems associated with new or expanded sewer facilities, and would not result in new significant impacts or a substantial increase in the severity of previously identified impacts.

Water Distribution

The City's PUD provides water distribution services in the City and certain surrounding areas. The water system extends over 400 square miles, including approximately 340 square miles in the City and includes the College Area CPU area.

No new water distribution or treatment facilities are proposed in conjunction with the proposed project. The potable water distribution system is continually upgraded and repaired on an ongoing basis through the City's CIP. These improvements are determined based on continuous monitoring by the E&CP's Engineering Division to determine remaining levels of capacity. The E&CP's Engineering Division plans its CIP projects several years prior to pipelines reaching capacity. Such improvements are required of the water system regardless of implementation of the proposed project. At a project level of review, physical impacts would be minimized through required

compliance with the City's ESL Regulations, Historical Resources Regulations, and other applicable LDC requirements, as well as any additional project features and/or project-specific mitigation measures as determined by the City. Future discretionary projects would also be reviewed for consistency with all applicable College Area CPU policies such as Policy 8.7 which calls for designing public utility facilities to blend into the design of the nearby building. While it is expected that individual future development projects would be able to reduce the potential impacts associated with providing new water distribution facilities with compliance with the City's regulatory and policy frameworks as well as with any additional project features and/or project-specific mitigation measures, at a program level of review, and without project-specific development plans, potential physical impacts and the extent of these impacts associated with future improvements to water lines are unknown. No feasible mitigation measures are available at this time, as the specific impacts and extent of impacts from future site-specific projects are unknown at this time. Impacts would be significant and unavoidable. Therefore, the proposed project is consistent with the impact conclusions identified in the Blueprint SD PEIR relative to utilities and service systems associated with new or expanded water distribution facilities, and would not result in new significant impacts or a substantial increase in the severity of previously identified impacts.

Electricity and Natural Gas

San Diego Gas & Electric (SDG&E) is the owner and operator of electricity transmission, distribution, and natural gas distribution infrastructure in San Diego County, and currently provides gas and electric services to the College Area CPU area. Natural gas is imported into the San Diego region by a Southern California Gas Company pipeline that enters San Diego County from Orange County located along I-5.

The College Area CPU includes policies that address potential impacts associated with electric power and natural gas utilities development within the CPU area including, but not limited to, Policy 4.29 which encourages the undergrounding of utilities to reduce conflicts with pedestrian movement where possible. When located above grade, locate utilities outside of the sidewalk pedestrian areas to allow for a clear path of travel wherever possible; and Policy 7.1 which calls on the City to "promote and facilitate the siting of new on-site photovoltaic energy generation and energy storage systems. New development occurring under the project may result in the need for new electric and natural gas transmission lines; however, no specific upgrades are proposed as part of the project, and the location and extent of future development is not known at this time. As future development is implemented at the project level, consistent with the College Area CPU, each individual project would be required to evaluate the physical impacts of development, including impacts associated with the installation of new electric power or natural gas utilities. At a project level of review, physical impacts would be minimized through required compliance with the City's ESL Regulations, Historical Resources Regulations, and other applicable LDC requirements, as well as any additional project features and/or project-specific mitigation measures as determined by the City. While it is expected that individual future development projects would be able to reduce potential impacts with compliance with the City's regulatory and policy frameworks as well as with any additional project features and/or project-specific mitigation measures, at a program level of review, potential physical impacts and the extent of these impacts associated with the construction of electric power and natural gas transmission lines required to support future projects are unknown, since the location of specific future development cannot be determined at this time. No feasible mitigation measures are available at this time, as the specific impacts and extent of impacts from future site-specific projects

are unknown at this time. Impacts would be significant and unavoidable. Therefore, the proposed project is consistent with the impact conclusions identified in the Blueprint SD PEIR relative to utilities and service systems associated with new or expanded electricity or natural gas facilities, and would not result in new significant impacts or a substantial increase in the severity of previously identified impacts.

Communications Systems

Communications systems for telephones, computers, and cable television are serviced by utility providers such as AT&T, Cox, Spectrum, and other independent cable companies. Television services are also available from satellite services,

New development occurring under the project may result in the need for new communications systems; however, no specific systems upgrades are proposed, and the location and extent of future facilities is not known at this time. Future siting of communications infrastructure would be in accordance with SDMC Section 141.0420, which regulates wireless communications facilities, as well as the City's Wireless Communications Facilities Guidelines, which provides guidelines to minimize visual impacts from the installation of wireless communications facilities in accordance with the City's General Plan. Project-level review for future communication systems would be required. Potential impacts associated with future site-specific development would be minimized through required compliance with the City's ESL Regulations, Historical Resources Regulations, and other applicable LDC requirements, as well as any additional project features and/or project-specific mitigation measures as determined by the City. Future discretionary projects would also be reviewed for consistency with all applicable College Area CPU policies such as Policy 8.7 which calls for designing public utility facilities to blend into the design of the nearby building. While it is expected that individual future development projects would be able to reduce potential impacts associated with the provision of new communications systems with compliance with the City's regulatory and policy frameworks as well as with any additional project features and/or project-specific mitigation measures, at a program level of review, potential physical impacts and the extent of these impacts associated with the future construction of communication systems required to support future projects are unknown, since the location of specific future development cannot be determined at this time. No feasible mitigation measures are available at this time, as the specific impacts and extent of impacts from future site-specific projects are unknown at this time. Impacts would be significant and unavoidable. Therefore, the proposed project is consistent with the impact conclusions identified in the Blueprint SD PEIR relative to utilities and service systems associated with new or expanded communications systems, and would not result in new significant impacts or a substantial increase in the severity of previously identified impacts.

V.16.2 Sufficient Water Supplies

Blueprint SD PEIR

Utility and service systems impacts related to sufficient water supplies are evaluated in Section 4.16.4 (Issue 2) of the Blueprint SD PEIR.

The Blueprint SD PEIR concluded that impacts related to implementation of the Blueprint SD Initiative would be less than significant because it plans for anticipated growth with a focus on increasing development densities and intensities within Climate Smart Village Areas and prioritizing higher density multi-family and mixed-use development which is more water efficient than single family land uses due to reduced demand for water use in landscaping. At the time specific land use changes are proposed, Water Supply Assessments (WSAs) would be prepared to evaluate and document the availability of water supply over the planning horizon. The Blueprint SD PEIR determined that providing WSA projections based on build-out assumptions for Blueprint SD would be speculative as the land use changes have not occurred and water demand assumptions are based on more refined analysis of actual growth projections. The water use assumptions for the Hillcrest FPA and University CPU included in the Blueprint SD PEIR were based on annual growth assumptions to provide a reasonable estimate of actual water demand. The Blueprint SD PEIR noted that according to WSAs prepared for the University CPU and Hillcrest FPA, there would be adequate water supply in a normal, single-dry year, and multiple-dry year (20-year) period, to meet the estimated water demands within these communities through 2045, the water supply planning horizon. Therefore, the Blueprint SD PEIR concluded that direct and cumulative water supply impacts would be less than significant.

College Area CPU

The City prepared a WSA based on the projected residential and non-residential buildout projections for the College Area CPU area (City 2024b; Attachment 5). SANDAG Series 14 forecasts were used to estimate existing and future 2045 population, employment, and future residential development. No net change in the adopted buildout amount of non-residential space is anticipated. The projected College Area CPU buildout from Attachment 5 is conservatively estimated at 31,825 residential units (13,225 units from SANDAG Series 14 forecast plus an additional 18,600 units proposed by the College Area CPU), including 7,432 single-family units and 24,393 multi-family units. As detailed in Attachment 5, the City assumes that approximately 400 homes would be constructed annually from 2020 to 2045. The WSA notes that the College Area CPU proposes more residential units than previously forecasted in the CPU area.

Although the proposed CPU includes a total water demand that is higher than forecasted for the CPU area, the WSA states that there is additional water supply in the three pressure zones that are partially included within the border of the CPU area that are available to serve the CPU area. The WSA concludes that the proposed water demand projections for the project are included in the regional water resource planning documents of the City and the Water Authority. Current and future water supplies, as well as actions necessary to develop future water supplies, have been identified. The WSA demonstrates that there will be sufficient water supplies available during normal, single-dry, and multiple-dry water years over a 20-year projection to meet the demands of the CPU.

The WSA concludes that there is sufficient water planned to supply the CPU's estimated annual average usage. The projected water demand of the College Area CPU is approximately 870,750 gallons per day (GPD), or 975 acre feet per year (AFY). Water demands for the CPU assume mandatory water efficiency standards are met and result in more water efficient buildings and landscapes as compared to older developments.

The 2020 Urban Water Management Plan (UWMP) establishes existing water demand and net capacity for future development. The College Area Community Plan area has a planned net supply/capacity of 3,458 AFY, which includes adequate supply for the proposed CPU. With CPU buildout, the CPU area is estimated to have a remaining net capacity of 2,483 AFY to serve future development (3,458 AFY planned capacity minus 975 AFY estimated capacity). Therefore, the City has adequate capacity to serve the projected water demand of the College Area CPU with the combined planned pressure zone capacity. As detailed in Attachment 5, there are sufficient water supplies to support the anticipated growth within the College Area CPU area considering normal and drought conditions. Per State law, the UWMP is required to be updated every five years; therefore, future development that could occur from 2045 to 2050 (the proposed CPU's planning horizon) would be accounted for in the next UWMP update. Impacts related to water supply would be less than significant. Therefore, the proposed project is consistent with the impact conclusions identified in the Blueprint SD PEIR relative to utilities and service systems associated with sufficient water supplies.

V.16.3 Adequate Wastewater Capacity

Blueprint SD PEIR

Utility and service systems impacts related to adequate wastewater capacity are evaluated in Section 4.16.4 (Issue 3) of the Blueprint SD PEIR.

The Blueprint SD PEIR stated that no new sewer collection or wastewater treatment facilities are proposed in conjunction with the Blueprint SD Initiative, Hillcrest FPA, or University CPU; however, their implementation would allow for increased intensity of development that could increase demand on public sewer systems. The Blueprint SD PEIR noted that site-specific information regarding future demand and available wastewater capacity to serve anticipated future development is not known at a program level of review. Mandatory compliance with the SDMC regulations, the City's Sewer Design Guidelines, and PUD's Capital Improvement Program Guidelines and Standards would ensure future development is required to demonstrate adequate wastewater facilities and capacity is available, or that appropriate infrastructure improvements are constructed concurrent with future development projects to ensure adequate capacity. At a project level of review, physical impacts would be avoided or minimized through required compliance with the City's ESL Regulations, Historical Resources Regulations, and other applicable LDC requirements, as well as any additional project features and/or project-specific mitigation measures. However, the Blueprint SD PEIR concluded that at the program level of review and without project-specific development plans, potential direct and cumulative impacts associated with increased demand on sewer infrastructure and wastewater capacity would be significant. No feasible mitigation measures were identified in the Blueprint SD PEIR as the specific impacts and extent of impacts from future site-specific projects are unknown. Direct and cumulative impacts would be significant and unavoidable.

College Area CPU

Although the College Area CPU does not propose new sewer collection or wastewater treatment facilities, the College Area CPU would allow for increased intensity of development that could increase demand on public sewer systems. Upgrades to sewer lines are an ongoing process. These upgrades are administered by the City's E&CP Department and are handled on a project-by-project

basis. As project implementation would likely result in an increase in demand for wastewater capacity, there may be a need to increase the sizing of existing pipelines and mains for wastewater. Wastewater treatment facilities may also require upgrades. PUD infrastructure planning includes long-range infrastructure planning and upgrades in anticipation of future growth based on PUD's ongoing comprehensive assessment of the City's wastewater infrastructure, including annual inspection of the City's sewer mains. Due to the project identifying appropriate locations for growth in response to SANDAG growth projections, existing and ongoing PUD planning would capture the anticipated wastewater demand from the project.

Individual future development projects implemented under the College Area CPU would be required to comply with relevant SDMC regulations regarding sewers and wastewater facilities (SDMC Chapter 6, Article 4, Division 4), the City's Sewer Design Guidelines, and PUD's Capital Improvement Program Guidelines and Standards, and would be subject to review at the time design plans are available that would ensure adequate capacity exists to serve future development. Potential impacts associated with the provision of future sewer facilities would be minimized through required compliance with the City's ESL Regulations, Historical Resources Regulations, and other applicable LDC requirements, as well as any additional project features and/or project-specific mitigation measures as determined by the City. While wastewater treatment capacity is likely to be addressed by PUD long-range planning and infrastructure improvements, future project-level evaluation of wastewater capacity would be required as future development is proposed, including the preparation of a sewer planning study addressing the existing capacity within the existing sewer collection system, and demonstrating that sufficient sewer capacity is available to accommodate future development, in accordance with the City's Sewer Design Guide.

As site-specific information regarding the specific demands of future projects in relation to available wastewater capacity to serve development cannot be known at a program level of review, impacts would be considered significant. No feasible mitigation measures are available at this time as the specific impacts and extent of impacts from future site-specific projects are unknown at this time. Impacts would be significant and unavoidable. Therefore, the proposed project is consistent with the impact conclusions identified in the Blueprint SD PEIR relative to utilities and service systems associated with adequate wastewater capacity, and would not result in new significant impacts or a substantial increase in the severity of previously identified impacts, and would not result in new significant impacts or a substantial increase in the severity of previously identified impacts.

V.16.4 Solid Waste

Blueprint SD PEIR

Utility and service systems impacts related to solid waste are evaluated in Section 4.16.4 (Issue 4) of the Blueprint SD PEIR.

The Blueprint SD PEIR concluded that future development within the Blueprint SD Initiative, Hillcrest FPA, and University CPU areas would generate solid waste through demolition/construction and ongoing operations, which would increase the amount of solid waste generated within the region. However, future projects would be required to comply with City regulations regarding solid waste that are intended to divert solid waste from the Miramar Landfill to preserve capacity. Compliance

with existing regulations requiring waste diversion would help preserve solid waste capacity. Therefore, the Blueprint SD PEIR concluded direct and cumulative impacts associated with solid waste would be less than significant.

College Area CPU

The City's Environmental Services Department manages residential solid waste disposal for eligible residences in the project areas pursuant to SDMC Section 66.0101 et seq. Refuse not eligible for the City's collection services is collected by privately operated franchised haulers. Waste generated in the City is taken primarily to three landfills: West Miramar Sanitary Landfill, Sycamore Landfill, and Otay Landfill.

Individual future development within the College Area CPU area would generate solid waste during construction and ongoing operations, which would increase the amount of solid waste generated within the region. However, projects implemented under the College Area CPU would be required to comply with applicable SDMC regulations related to recycling (SDMC Sections 66.0702 through 66.0718) in addition to requirements for the recycling of construction and demolition debris specified in the City's Construction and Demolition Debris Diversion Deposit Program Ordinance (Sections 66.0601 through 66.0610 of the SDMC).

All future development proposed under the project would be required to comply with SDMC Section 142.0801 et seq., which outlines the requirements for refuse and recyclable materials storage that would ensure sufficient project-specific interior and exterior storage space for refuse and recyclable materials is included in the project design. Adherence to these regulations would help the City meet its recycling and waste reduction goals as established by the City and mandated by the State of California and would further conserve the capacity of the landfill as solid waste materials would be diverted to the appropriate recycling or organic waste facility.

Through mandatory compliance with the SDMC regulations related to solid waste, new development projects would continue to reduce solid waste generation and increase recycling efforts. Through compliance with existing policies and regulations, impacts associated with solid waste management would be less than significant. Therefore, the proposed project is consistent with the impact conclusions identified in the Blueprint SD PEIR relative to utilities and service systems associated with solid waste, and would not result in new significant impacts or a substantial increase in the severity of previously identified impacts.

V.16.5 Conclusion

Based on the foregoing analysis and information, there is no evidence that the College Area CPU would require a major change to the Blueprint SD PEIR relative to utilities and service systems. The Blueprint SD PEIR concluded that impacts related to utilities and adequate wastewater capacity would be significant and unavoidable even with regulatory compliance at the program level. As with the Blueprint SD PEIR, project impacts to utilities and adequate wastewater capacity would be significant and unavoidable. The Blueprint SD PEIR concluded that impacts related to sufficient water supply and solid waste would be less than significant. Likewise, there would be sufficient water supplies available to serve the College Area CPU area during normal, dry, and multiple dry years, and future development would comply with federal, state, and local management and

reduction statutes and regulations related to solid waste. The College Area CPU would not result in any new significant impacts related to utilities and service systems, nor would it result in a substantial increase in the severity of impacts related to utilities and service systems from those described in the Blueprint SD PEIR.

V.17 Water Quality

V.17.1 Water Quality Standards or Waste Discharge Requirements

Blueprint SD PEIR

Water quality impacts related to water quality standards or waste discharge requirements are evaluated in Section 4.17.4 (Issue 1) of the Blueprint SD PEIR.

The Blueprint SD PEIR concluded that future development that may occur due to implementation of the Blueprint SD Initiative, Hillcrest FPA, and University CPU would have the potential to result in urban runoff and associated pollutant discharges. The Blueprint SD PEIR noted that new development would be required to implement LID BMPs into the design of future projects to address the potential for the transport of pollutants of concern through either retention or filtration, consistent with the requirements of the MS4 Permit for the San Diego region and the City's Stormwater Standards Manual. The Blueprint SD PEIR determined that implementation of LID BMPs and stormwater construction BMPs would reduce the amount of pollutants transported from the project sites to receiving waters. It also noted that future development projects implemented under the Blueprint SD Initiative, Hillcrest FPA, and University CPU would also be subject to existing stormwater regulations in place at the time projects are implemented. Thus, through compliance with the existing regulatory framework addressing protection of water quality, the Blueprint SD PEIR concluded direct and cumulative water quality impacts would be less than significant.

College Area CPU

Water Quality Standards and Waste Discharge Requirements

Development implemented under the College Area CPU could result in urban runoff and associated pollutant discharges. As future development occurs, applicable regulatory requirements would be triggered that would require the retention and/or treatment of stormwater through the implementation of LID BMPs. The City's NPDES permit requirements would require future development to demonstrate how pollutants would be treated to prevent discharge into receiving waters. Additionally, the City's MS4 Permit requires the development of Water Quality Improvement Plans (WQIPs), administered through the RWQCB and implemented by the City as a co-permittee, which would guide future development towards achieving improved water quality.

Under current stormwater regulations in the City, development projects are subject to certain minimum stormwater requirements to protect water quality and are required to submit a Stormwater Applicability Checklist (form DS-560) to determine the applicable stormwater requirements. Based on this form, the City ensures that the project has been properly identified as a Priority Development Project, Standard Development Project or is Exempt from additional

stormwater requirements. In the case of a Standard Development Project, the assigned reviewer checks the submitted construction documents to ensure that the project meets the minimum site design and source control BMP requirements set forth for all development projects in the Stormwater Standards Manual. Further, if a project is determined to be a Priority Development Project, it is required to submit a Storm Water Quality Management Plan at initial submittal to ensure incorporation of structural BMPs at initial design.

If future proposed projects within the College Area CPU area would disturb one or more acres of land, the project would be subject to the Construction Stormwater General Permit (Construction General Permit), Order No. WQ 2022-0057-DWQ (NPDES NO. CAS000002), issued by the State Water Resources Control Board (SWRCB), and would be required to prepare and submit a Storm Water Pollution Prevention Plan (SWPPP) to the City and the SWRCB. If the proposed project would disturb less than one acre of land, a Water Pollution Control Plan (WPCP) would be required to be prepared and submitted to the City. The SWPPP and WPCP require the project proponent to identify actions that would be implemented to prevent pollutants in stormwater discharges from leaving the project site during construction. Project compliance with the applicable stormwater requirements would address water quality impacts during construction.

Compliance with the City's NPDES and MS4 permits, Stormwater Standards Manual, JRMP, and SDMC requirements for stormwater management (collectively referred to as the "City Stormwater Regulations") would normally suffice to reduce water quality impacts to below a level of significance. Project compliance with the City's Stormwater Regulations would preclude water quality impacts due to all ministerial and discretionary project being subject to compliance with the City's Stormwater Standards Manual, including requirements to implement applicable site design, source control, structural pollutant control, and hydromodification BMPs. Implementation of required stormwater LID BMPs would reduce the amount of pollutants transported from future development projects to receiving waters.

Future development within the College Area CPU area would be subject to the existing City Stormwater Regulations in place at the time projects are implemented. In addition, future discretionary development projects would be required to demonstrate consistency with College Area CPU policies related to the management and treatment of surface water and ground water quality including, but not limited to, Policy 4.37 which calls for designing street improvements that include storm water infiltration measures that reduce storm water runoff and flooding where warranted feasible; Policy 4.42 which calls for considering green street improvements to reduce stormwater runoff; Policy 7.3 which calls for utilizing sustainable design that reduces greenhouse gas emissions, pollution, dependency on non-renewable energy sources, makes efficient use of local resources, and incorporates sustainable landscaping, water use, and storm water management; Policy 8.2 which calls for designing public facilities with an expanded urban tree canopy to reduce the heat island effect, reduce stormwater runoff, and improve air quality; and Policy 8.30 which calls for minimizing urban runoff and flooding by minimizing impervious surfaces, increasing green spaces, and incorporating sustainable stormwater facilities such as bio-swales and permeable pavement.

Future development would need to provide an engineering analysis to demonstrate compliance with the Stormwater Standards Manual. Required compliance for future development with the applicable City Stormwater Regulations and WQIP implementation in compliance with the City's MS4 Permit

would ensure adverse impacts related to compliance with water quality standards would be less than significant. Therefore, the College Area CPU is consistent with the impact conclusions identified in the Blueprint SD PEIR associated with water quality standards and waste discharge requirements, and would not result in new significant impacts or a substantial increase in the severity of previously identified impacts.

Impaired Waterbodies

Under Section 303(d) of the Clean Water Act (CWA), states, territories, and authorized tribes are required to develop lists of impaired waters that are too polluted or otherwise degraded to meet the water quality standards set by states, territories, or authorized tribes. The CWA requires that these jurisdictions establish priority rankings for waters on the lists and develop total maximum daily loads (TMDLs) to identify the maximum amount of a pollutant that a waterbody can receive and still safely meet water quality standards. Water bodies within the College Area CPU identified on the CWA 303(d) list as impaired include Alvarado Creek. Other listed waterbodies that are downstream receiving waters but not within the CPU area include San Diego River (lower) and Chollas Creek (SWRCB 2022).

Future development within the College Area CPU area would have the potential to result in new pollutant discharges to these already impaired waterbodies, which could further degrade the existing impairment of the water body. Future development projects that would discharge the same pollutant for which that waterbody is already impaired could exacerbate an existing condition and result in a significant impact. The impact may be lessened if there is an adopted Total Maximum Daily Load (TMDL) Program for this waterbody and associated pollutant that identifies the allowable pollutant load that may be discharged into the waterbody. TMDL Programs are in place for the San Diego River (for indicator bacteria) and for Chollas Creek (for diazinon, copper, lead, and zinc) (SWRCB 2025).

Future development projects in the College Area CPU area would require preparation of a site-specific water quality study to determine the anticipated pollutant loads from the project and to identify the pollutant load reduction from implementation of the applicable treatment control LID BMPs to reduce the discharge to the maximum extent practicable and to identify if the project discharge meets the applicable water quality standards or TMDL requirements. Due to required implementation of applicable regulatory requirements including site specific LID BMPs and site design measures, impacts to impaired waterbodies resulting from future development would be less than significant. Therefore, the College Area CPU is consistent with the impact conclusions identified in the Blueprint SD PEIR associated with impaired waterbodies, and would not result in new significant impacts or a substantial increase in the severity of previously identified impacts.

Environmentally Sensitive Areas

The City's designated Environmentally Sensitive Areas are identified in Appendix XVI of the City's JRMP. Environmentally Sensitive Areas include CWA 303(d) listed waters (discussed above), areas of special biological significance, and waterbodies designated with the "RARE" beneficial use, which includes uses of water that support habitats necessary, at least in part, for the survival and successful maintenance of plant or animal species established under state or federal law as rare, threatened, or endangered. Alvarado Creek is the only Environmentally Sensitive Area within the

College Area CPU area. The lower San Diego River, a downstream receiving water, is also considered an Environmentally Sensitive Area.

Future development pursuant to the College Area CPU would have the potential to discharge into a designated Environmentally Sensitive Area, which could result in a significant impact if those discharges would impair water quality or beneficial uses associated with that waterbody. Future development anticipated under the project would be required to demonstrate compliance with the applicable source control BMPs, site design LID BMPs, as well as pollutant control BMPs and hydromodification management BMPs, as identified in the City's Stormwater Regulations. Future development's required compliance with the City's Stormwater Regulations at the time development is implemented would ensure pollutant discharges are reduced to the maximum extent practicable to avoid impacts to receiving waterbody. Impacts would be less than significant. Therefore, the College Area CPU is consistent with the impact conclusions identified in the Blueprint SD PEIR associated with environmentally sensitive areas, and would not result in new significant impacts or a substantial increase in the severity of previously identified impacts.

V.17.2 Water Quality Control Plans or Sustainable Groundwater Management Plans

Blueprint SD PEIR

Water quality impacts related to water quality control plans or sustainable groundwater management plans are evaluated in Section 4.17.4 (Issue 2) of the Blueprint SD PEIR.

The Blueprint SD PEIR concluded that future development in the Blueprint SD Initiative area would be required to comply with applicable WQIPs and the Water Quality Control Plan for the San Diego Basin which includes the groundwater management plan and BMPs to be implemented at the project level. Additionally, the Blueprint SD PEIR noted that all development in the City is subject to the drainage regulations contained in the SDMC Chapter 14, Article 2, Division 2, Stormwater Runoff and Drainage Regulations, which require that all development be conducted to prevent erosion and stop sediment and pollutants from leaving the property to the maximum extent practicable. Thus, the Blueprint SD PEIR concluded that direct and cumulative impacts would be less than significant.

College Area CPU

The College Area CPU area is within two watershed management areas (WMA). Almost all of the CPU area lies within the San Diego River WMA, and the very southern portion is within the San Diego Bay WMA. As such, applicable WQIPs for the CPU area include the San Diego River WQIP (City of El Cajon, et al 2016) and the San Diego Bay WQIP (City of Chula Vista, et al 2016). The City is a participating agency in the preparation of these WQIPs, along with the cities of Chula Vista, El Cajon, La Mesa, Santee, the County of San Diego, and Caltrans. Both of these WQIPs identify the following goals for the City:

- Develop a green infrastructure policy, attain City Council approval, and construct green infrastructure BMPs to improve water quality during wet and dry weather; and
- Implement runoff reduction programs that include targeted education and outreach efforts, enhanced inspections, additional rebate programs, and increased enforcement.

Future individual development projects in the College Area CPU area would be required to comply with the applicable WQIP (San Diego River WQIP or San Diego Bay WQIP) and the Water Quality Control Plan for the San Diego Basin, which includes the groundwater management plan and identifies BMPs to be implemented at the project level. In addition, individual projects under the College Area CPU would be required to comply with City's Stormwater Regulations. Impacts would be less than significant. Therefore, the College Area CPU is consistent with the impact conclusions identified in the Blueprint SD PEIR associated with water quality control plans or sustainable groundwater management plans, and would not result in new significant impacts or a substantial increase in the severity of previously identified impacts.

V.17.3 Conclusion

Based on the foregoing analysis and information, there is no evidence that the College Area CPU would require a major change to the Blueprint SD PEIR related to water quality. The Blueprint SD PEIR concluded that water quality impacts related to water quality standards or waste discharge requirements and water quality control plans and groundwater management control plans would be less than significant based on regulatory compliance, and no mitigation was required. Likewise, implementation of the City's Stormwater Regulations and adherence to the policy framework in the College Area CPU at the time future development projects are proposed would ensure water quality impacts resulting from implementation of the project are reduced to less than significant. The College Area CPU would not result in any new significant water quality impacts, nor would it result in a substantial increase in the severity of water quality impacts from those described in the Blueprint SD PEIR.

V.18 Wildfire

V.18.1 Wildfire Hazards

Blueprint SD PEIR

Wildfire impacts related to wildfire hazards are evaluated in Section 4.18.4 (Issue 1) of the Blueprint SD PEIR.

The Blueprint SD PEIR determined that the Blueprint SD Initiative, Hillcrest FPA, and University CPU are planning level actions that anticipate both future development and future planning level actions that may result in an increase in development intensities including the number of residents located within areas having wildfire risk. The increase in the number of residents located within areas at risk of wildland fires could increase the exposure of people and structures to wildfires and thus the Blueprint SD PEIR concluded that direct and cumulative impacts would be significant.

The Blueprint SD PEIR includes mitigation measures at the program level to serve as the basis for more specific refinement of future mitigation measures to be developed as specific projects are proposed. MM-FIRE-1 requires the City to evaluate future CPUs or other plan amendments proposed consistent with the Blueprint SD Initiative and the Village Climate Goal Propensity Map for the adequacy of evacuation routes, emergency access and fire safety in light of the proposed land

use and mobility network. Future discretionary projects would be required to implement MM-FIRE-2 which reinforces required compliance with the City's applicable regulatory and policy framework such as the Fire Code, Building Regulations, and Brush Management Regulations and Landscape Standards, as well as consistency with the California Office of the Attorney General issued guidance outlining best practices for analyzing and mitigating wildfire impacts of development projects under CEQA for projects with a higher level of wildfire or evacuation risk, as determined by the City. However, at a program level of review and without community-specific evaluation and project-specific details available for site-specific evaluation, the Blueprint SD PEIR concluded direct and cumulative impacts would be significant and unavoidable.

College Area CPU

The College Area CPU area contains areas designated as Very High Fire Hazard Severity Zones, as depicted in Figure 13, *Very High Fire Hazard Severity Zones*, primarily in the northwestern portion within canyons, open space and low-density residential land use areas (California Department of Forestry and Fire Protection [CAL FIRE] 2024). Implementation of the College Area CPU would result in increased residential density and mixed-use village development. This increase in development could expose additional people and structures to wildfires. The College Area CPU identifies fire hazard as a significant risk in the CPU area, particularly within and around the community's canyons and hillsides. The College Area CPU includes several policies to ensure future buildout is responsive to fire risk including, but not limited to:

- Policy 7.4: Encourage fire resistant landscaping and design, such as the use of fire-resistant plant species and non-combustible materials, fire breaks, and regular brush management.
- 8.19: Consider siting a new fire station within the College Area at a location to be determined. Consider potential sites near SDSU and coordinate with SDSU on the potential to locate a future fire station on property owned by the University, and on the potential to contribute to the funding of a new fire station.
- Policy 8.20: Evaluate potential upgrades, expansions and new fire stations and equipment to maintain adequate service.
- Policy 8.21: Maintain and evaluate sufficient fire-rescue services to serve the College Area, particularly in areas adjacent to open space canyons and hillsides.
- Policy 8.22: Provide routine brush management within the City owned open space.
- Policy 8.23: Provide education and information to the community regarding fire prevention techniques, defensible space, and required routine brush management for private properties.
- Policy 8.25: Encourage use of fire-resistant materials in building construction, such as fireproof roofing, walls, and windows.

Pursuant to the Blueprint SD PEIR, the project, as a CPU, is required to implement Blueprint SD PEIR MM-FIRE-1, which requires the City to evaluate the adequacy of evacuation routes, emergency access, and fire safety in light of the proposed land use and mobility network. This evaluation must

include a review of plan consistency with specific General Plan policies, including Policy LU-C.2.A.5, Policy UD-A.3.h, Policy UD-A.3.p, Policy PF-D.12, Policy PF-D.13, Policy PF-D.14, Policy PF-D.15, and Policy PF-D.16. An analysis of the College Area CPU's consistency with General Plan policies is provided in Table 9, *College Area CPU General Plan Wildfire Policy Consistency Analysis*, below.

Table 9
COLLEGE AREA CPU GENERAL PLAN WILDFIRE POLICY CONSISTENCY ANALYSIS

General Plan Policy	CPU Consistency Analysis
LU-C.2.A.5: Prepare community plans to address aspects of development that are specific to the community, including: distribution and arrangement of land uses (both public and private); the local street and transit network; existing and planned public facilities; community and site-specific urban design guidelines; urban design guidelines addressing the public realm; community and site-specific recommendations to preserve and enhance natural and cultural resources; and coastal resource policies (when within the Coastal Zone). a. Apply land use designations at the parcel level to guide sustainable and equitable development within a community. 5. Designate land uses with careful consideration to fire evacuation routes in accordance with Section D: Fire-Rescue of the Public Facilities, Safety and Services Element; also consider hazard areas including areas affected by flooding and seismic risk as identified by Figure CE-5 Flood Hazard Areas and Figure PF-6 Geo-Technical and Relative Risk Areas.	Consistent. The risk of wildfire was evaluated during the preparation of the College Area CPU. Specific to fire evacuation, the primary transportation corridor that would serve as emergency access and emergency evacuation for the College Area CPU area would be I-8, which is accessible via Fairmount Avenue, College Avenue, and Lake Murray Boulevard. Future development under the College Area CPU is anticipated to be concentrated along and near transportation corridors some of which serve as emergency evacuation routes or provide connections to designated evacuation routes. Implementation of the College Area CPU would also improve circulation and mobility for all modes of travel, including emergency vehicles throughout the College Area CPU area. For example, proposed dedicated transit lanes on El Cajon Boulevard from 54th Street to Montezuma Road and along College Avenue from El Cajon Boulevard to Montezuma Road can be used for emergency response vehicles as needed. Additionally, Montezuma Road from College Avenue to El Cajon Boulevard is proposed to be converted to a two-lane collector with a two-way center left turn lane that can be utilized to facilitate emergency response when needed. The proposed CPU also includes policies which support emergency response and improvements to the mobility network such as, but not limited to, Policy 8.1 which calls for locating public facilities along transit corridors, villages and nodes to increase accessibility and efficiently deliver services; Policy 3.8 which calls for integrating transit priority features to further improve operational efficiency along thoroughfares where feasible; Policy 3.14 which supports new mobility connections that enhance circulation, especially to subdivisions that have only one route of ingress and egress; and Policy 3.20 which supports upgrading traffic signals to facilitate traffic signal coordination, transit priority and adaptive coordination along corridors and adjacent to and serving SDSU to facilitate traffic management around the campus especially during special events. Implementation of the College Area CPU is not

Table 9
COLLEGE AREA CPU GENERAL PLAN WILDFIRE POLICY CONSISTENCY ANALYSIS

General Plan Policy	CPU Consistency Analysis
	anticipated to impede emergency response or evacuation because the existing transportation network serving the community would remain accessible for emergency response and evacuations; and the College Area CPU identifies proposed mobility improvements and a robust policy framework which would facilitate the development of a safe, efficient, and well-connected mobility network that would enable effective emergency response and evacuation.
UD-A.3.h: Design development adjacent to natural features in a sensitive manner to highlight and complement the natural environment in areas designated for development. h. Use building and landscape materials that blend with and do not create visual or other conflicts with the natural environment in instances where new buildings abut natural areas. This guideline must be balanced with a need to clear natural plants for fire protection to ensure public safety in some areas.	Consistent. The College Area CPU land use plan focuses future development within existing developed areas. Where new development would occur adjacent to open space areas, they would be required to comply with the existing regulatory framework including, but not limited to, the City's ESL Regulations, and brush management in accordance with the City's Brush Management Regulations would be required. Additionally, future discretionary development projects within the College Area CPU area would be reviewed for consistency with CPU policies which encourage planting native and/or climate appropriate landscaping and trees, fire resistant landscaping and design, protecting and strengthening sensitive native habitats, routine brush management, education and information regarding fire prevention, and the use of fire-resistant materials in building construction (see Policies 4.43, 7.4, 7.6, 8.22, 8.23, and 8.25).
UD-A.3.p: Design development adjacent to natural features in a sensitive manner to highlight and complement the natural environment in areas designated for development. p. Design structures to be ignition and fire-resistant in fire prone areas or at-risk areas as appropriate. Incorporate fire-resistant exterior building materials and architectural design features to minimize the risk of structure damage or loss due to wildfires.	Consistent. The College Area CPU land use plan focuses future development within existing developed areas. Where new development would occur adjacent to open space areas in fire-prone areas (within the Very High Fire Hazard Severity Zone), review of building materials and design features would occur at the subsequent site-specific, project level to ensure compliance with the City's applicable regulatory framework such as the Fire Code, Building Regulations, and Brush Management Regulations. Future discretionary development within the CPU area would also be reviewed for consistency with CPU's policy framework, including but not limited to, Policy 7.4 which encourages fire-resistant landscaping and design, such as the use of fire-resistant plant species and non-combustible materials, fire breaks, and regular brush management; and Policy 8.25 which encourages the use of fire-resistant materials in building

Table 9
COLLEGE AREA CPU GENERAL PLAN WILDFIRE POLICY CONSISTENCY ANALYSIS

General Plan Policy	CPU Consistency Analysis
PF-D.12: Protect communities from unreasonable risk of wildfire within very high fire hazard severity zones. a. Assess site constraints when considering land use designations near wildlands to avoid or minimize wildfire hazards as part of a community plan update or amendment. (see also LU-C.2.a.4) b. Identify building and site design methods or other methods to minimize damage if new structures are located in very high fire hazard severity zones on undeveloped land and when rebuilding after a fire. c. Require ongoing brush management to minimize the risk of structural damage or loss due to wildfires. d. Provide and maintain water supply systems to supplies for fire suppression. e. Provide adequate fire protection. (see also PF-D.1 and PF-D.2).	construction, such as fireproof roofing, walls, and windows. Consistent. The risk of wildfire was evaluated during the preparation of the College Area CPU. The College Area CPU land use plan focuses future development within existing developed areas. Where new development would occur in or adjacent to areas mapped within the Very High Fire Hazard Severity Zone, it would be required to comply with the City's applicable regulatory framework such as the Fire Code, Building Regulations, and Brush Management Regulations. The College Area CPU also includes policies which address fire-resistant building design, brush management, and fire-rescue services in the community such as Policy 8.19 which calls for considering siting a new fire station within the College Area at a location to be determined; Policy 8.20 which calls for evaluating potential upgrades, expansions and new fire stations and equipment to maintain adequate service; Policy 8.21 which calls for maintaining and evaluating sufficient fire-rescue services to serve the College Area, particularly in areas adjacent to open space canyons and hillsides; Policy 8.22 which calls for providing routine brush management within the City's owned open space areas; and Policy 8.25 which encourages the use of fire-resistant materials in building construction, such as fireproof roofing, walls, and windows. Furthermore, CPU Policy 8.1 calls for locating public facilities along transit corridors, villages and nodes to increase accessibility and efficiently deliver services.; and Policy 8.24 calls for coordinating with San Diego State University on fire-safety needs that could include potential for a campus fire station. As discussed in Section V.16.2 of this Addendum, the WSA concluded that that there is sufficient water planned to supply the CPU's estimated annual average usage. The WSA also determined that current and future water supply resources, as well as actions necessary to develop future water supplies, have been identified. Therefore, an adequate water supply is available for future fire-fighting purposes.
PF-D.13: Incorporate fire safe design into development within very high fire hazard severity zones to have fire-resistant building and site design, materials, and landscaping as part of the development review process.	Consistent. The risk of wildfire was evaluated during the preparation of the College Area CPU. The College Area CPU land use plan focuses future development within existing developed areas. Where new development would occur in or adjacent to areas

Table 9
COLLEGE AREA CPU GENERAL PLAN WILDFIRE POLICY CONSISTENCY ANALYSIS

General Plan Policy	CPU Consistency Analysis
a. Ensure consistency with local and state Building Regulations for fire safety and defensible space. b. Locate, design and construct development to provide adequate defensibility and minimize the risk of structural loss from wildland fires. c. Design development on hillsides and canyons to reduce the increased risk of fires from topography features (i.e., steep slopes, ridge saddles). d. Minimize flammable vegetation and implement brush management best practices in accordance with the Land Development Code. e. Design and maintain public and private streets for adequate fire apparatus vehicles access (ingress and egress), and install visible street signs and necessary water supply and flow for structural fire suppression. f. Provide and maintain adequate fire breaks where feasible, or identify other methods to slow the movement of a wildfire in very high fire hazard severity zones in coordination with Fire-Rescue Department and other applicable local, state, and federal fire protection agencies.	mapped within the Very High Fire Hazard Severity Zone, review of building materials and design features would occur at the site-specific, project level to ensure compliance with the City's applicable regulatory and policy framework such as the Fire Code, Building Regulations, and Brush Management Regulations. In addition, the College Area CPU also includes policies which address fire-resistant building design, brush management, and fire-rescue services in the community including, but not limited to, Policy 7.4 which encourages the use of fire resistant landscaping and design, such as the use of fire-resistant plant species and non-combustible materials, fire breaks, and regular brush management; Policy 8.21 which calls for maintaining and evaluating sufficient fire-rescue services to serve the College Area, particularly in areas adjacent to open space canyons and hillsides; Policy 8.22 calls for routine brush management within the City owned open space; and Policy 8.25 which encourages the use of fire-resistant materials in building construction, such as fireproof roofing, walls, and windows. As discussed in Section V.16.2 of this Addendum, the WSA concluded that that there is sufficient water planned to supply the CPU's estimated annual average usage. The WSA also determined that current and future water supplies, as well as actions necessary to develop future water supplies, have been identified. Therefore, an adequate water supply is available for future fire-fighting purposes. No roadway classification modifications are proposed along the public streets within the Very High Fire Hazard Severity zone in the College Area CPU. The College Area CPU identifies changes to the mobility network that would improve circulation and mobility for all modes of travel, including emergency vehicles. Emergency access along existing streets would not be affected by the proposed CPU. The College Area CPU proposes transit-only and/or shared bus-bike lanes which can be utilized as-needed for emergency access, and would be available for emergency vehicles, thereby improving emergency access in the CPU area. Additionally, Montezuma Road from College Avenue to El Cajon Boulevard is proposed to be converted to a two-lane

Table 9
COLLEGE AREA CPU GENERAL PLAN WILDFIRE POLICY CONSISTENCY ANALYSIS

General Plan Policy	CPU Consistency Analysis
	collector with a two-way center left turn lane that can be utilized to facilitate emergency response when needed. The College Area CPU also includes policies that would support improvements to the mobility network that would facilitate emergency access such as Policy 3.14 which calls for supporting new mobility connections that enhance circulation, especially to subdivisions that have only one route of ingress and egress. Future development in the College Area CPU area would also be required to comply with the City's Brush Management Regulations which require the provision of fire breaks between structures adjacent to open space or wild lands in order to provide defensible space between structures.
PF-D.14: Implement brush management along City maintained roads in very high fire hazard severity zones adjacent to open space and canyon areas.	Consistent. Future development within the College Area CPU area would be required to comply with the City's Brush Management Regulations. The College Area CPU also includes policies which address brush management including Policy 8.22 which calls for the provision of routine brush management within the City-owned open space, and Policy 8.23 calls for providing education and information to the community regarding fire prevention techniques, defensible space, and required brush management for private properties.
PF-D.15: Maintain access for fire apparatus vehicles along public streets in very high fire hazard severity zones for emergency equipment and evacuation.	Consistent. No roadway classification modifications are proposed along the public streets within the Very High Fire Hazard Severity zone in the College Area CPU. The College Area CPU identifies changes to the mobility network that would improve circulation and mobility for all modes of travel, including emergency vehicles. The College Area CPU proposes transit-only and/or shared bus-bike lanes which can be utilized as-needed for emergency access, and would be available for emergency vehicles, thereby improving emergency access in the CPU area. Additionally, Montezuma Road from College Avenue to El Cajon Boulevard is proposed to be converted to a two-lane collector with a two-way center left turn lane that can be utilized to facilitate emergency response when needed. The College Area CPU also includes policies that would support improvements to the mobility network that would facilitate emergency access such as Policy 3.14 which calls for supporting new mobility connections that enhance circulation, especially to

Table 9
COLLEGE AREA CPU GENERAL PLAN WILDFIRE POLICY CONSISTENCY ANALYSIS

General Plan Policy	CPU Consistency Analysis
	subdivisions that have only one route of ingress and egress.
PF-D.16: Provide wildland fire preparedness education for fire safety advance planning.	Consistent. The College Area CPU includes policies which address wildland fire preparedness and education, including Policy 8.4 which encourages the provision of programming for hazard preparedness to mitigate risk from natural disaster within the community, and Policy 8.23 calls for providing education and information to the community regarding fire prevention techniques, defensible space, and required routine brush management for private properties. The City also recently released an updated guide for private property owners, <i>Guide to Brush Management: Property Owners</i>, available at www.sandiego.gov/biodiversity on how to maintain privately owned brush management areas adjacent to open space and canyon areas while emphasizing the importance of maintaining defensible space.

As summarized in Table 9, the College Area CPU would be consistent with these policies. In addition, future plan amendments in the College Area CPU area that are proposed consistent with the Blueprint SD Initiative and the Village Climate Goal Propensity Map would be required to implement Blueprint SD PEIR MM-FIRE-1 which requires an evaluation of the adequacy of evacuation routes, emergency access, and fire safety in light of the proposed land use and mobility network, and future discretionary development projects proposed consistent with the College Area CPU would be required to implement Blueprint SD PEIR MM-FIRE-2, which requires future discretionary projects to demonstrate consistency with the City's applicable regulatory and policy framework such as the Fire Code, Building Regulations, and Brush Management Regulations and Landscape Standards, as well as the California Office of the Attorney General issued guidance outlining best practices for analyzing and mitigating wildfire impacts of development projects under CEQA. In general, project-level compliance with the City's building code, fire code, and brush management regulations would ensure impacts related to wildfire would be reduced to less than significant. Furthermore, at a project level of review additional project features and/or project-specific mitigation measures could be identified which would minimize potential wildfire impacts. However, at a program level of review and without project-specific details available for site-specific evaluation, potential impacts cannot be known with certainty. Therefore, impacts would be significant and unavoidable. Therefore, the proposed project is consistent with the impact conclusions identified in the Blueprint SD PEIR relative to wildfire hazards, and would not result in new significant impacts or a substantial increase in the severity of previously identified impacts.

V.18.2 Emergency Response and Evacuation

Blueprint SD PEIR

Wildfire impacts related to emergency response and evacuation are evaluated in Section 4.18.4 (Issue 2) of the Blueprint SD PEIR.

The Blueprint SD PEIR concluded the buildout of the Blueprint SD Initiative, Hillcrest FPA, and University CPU would result in higher intensity development within the City. As growth occurs, it would be focused within urban settings, in areas with an established transportation network where there is a greater likelihood that alternative modes of transportation such as walking/rolling, biking, and transit use would be encouraged. Throughout the City and beyond, there are generally adequate emergency evacuation routes through the major interstate system, local highways, and prime arterials within San Diego County. As growth occurs, the City would continue to implement its Emergency Operations Plan, San Diego Police Department Policy and Procedures, Operational Area Emergency Plan, and the California Master Mutual Aid Agreement to address emergency evacuation. Further, the Blueprint SD PEIR determined that future development implemented in accordance with the Blueprint SD Initiative, Hillcrest FPA, and University CPU would be subject to compliance with the City's Fire Code. Thus, the Blueprint SD PEIR concluded direct and cumulative impacts related to emergency evacuation would be less than significant.

College Area CPU

Implementation of the College Area CPU would result in increased residential densities and mixed-use village development consistent with the General Plan's Village Climate Goal Propensity Map. At buildout, the College Area CPU would result in approximately 25,950 additional residential units. This increase in development would increase the population within the CPU area that could require evacuation in the event of an emergency. The project does not propose changes to the available evacuation routes within the CPU area (primarily I-8, which is accessible via Fairmount Avenue, College Avenue, and Lake Murray Boulevard). The College Area CPU includes policies supporting emergency response and operational improvements, such as Policy 8.1 which calls for locating public facilities along transit corridors, villages and nodes to increase accessibility and efficiently deliver services; Policy 8.4 which encourages the provision of programming for hazard preparedness to mitigate risk from natural disaster within the community; Policy 8.19 which calls for considering siting a new fire station within the College Area at a location to be determined and consider potential sites near SDSU and coordinating with SDSU on the potential to locate a future fire station on property owned by the University, and on the potential to contribute to the funding of a new fire station; Policy 8.20 which calls for evaluating potential upgrades, expansions and new fire stations and equipment to maintain adequate service; and Policy 8.21, which supports maintaining and evaluating sufficient fire-rescue services to serve the College Area, particularly in areas adjacent to open space canyons and hillsides.

Implementation of the College Area CPU would also improve circulation and mobility for all modes of travel, including emergency vehicles throughout the College Area CPU area. The College Area CPU proposes dedicated transit lanes on El Cajon Boulevard from 54th Street to Montezuma Road and along College Avenue from El Cajon Boulevard to Montezuma Road. These existing travel lanes would be re-purposed for congestion-reducing mobility forms (i.e., transit and/or bicycles) and would encourage more people to choose transit and bicycling as their preferred mode of transportation, which would reduce traffic congestion and improve circulation efficiency. Further, these transit-only and/or shared bus-bike lanes can be utilized as-needed for emergency access, and would be available for emergency vehicles, thereby improving emergency access in the CPU area.

Additionally, Montezuma Road from College Avenue to El Cajon Boulevard is proposed to be converted to a two-lane collector with a two-way center left turn lane that can be utilized to facilitate emergency response when needed. The College Area CPU also includes policies which support a safe, efficient, and well-connected mobility network, such as Policy 3.11 which supports the implementation of 'Vision Zero' through traffic calming measures, and Policy 3.14 which supports new mobility connections that enhance circulation, especially to subdivision that only have one route of ingress and egress. The College Area CPU also calls for the implementation of Intelligent Transportation Systems (ITS) infrastructure. For example, Policy 3.20 supports the upgrade of traffic signals to facilitate traffic signal coordination, transit priority and adaptive coordination along corridors and adjacent to and serving SDSU to facilitate traffic management around the campus especially during special events. As these systems come online, they would further improve the efficiency of the transportation network.

As concluded in the Blueprint SD PEIR, there are generally adequate emergency evacuation routes through the major interstate system, local highways, and prime arterials within San Diego County. The primary transportation corridor that would serve as emergency access and emergency evacuation for the College Area CPU area would be I-8, which forms the northern boundary of the CPU area, and is accessible via Fairmount Avenue, College Avenue, and 70th Street. In addition to these vehicular transportation routes, the College Area CPU area has access to the MTS Green Line Trolley, which could facilitate emergency evacuation efforts. The anticipated highest intensity development in the College Area CPU area is focused around areas with transit access and access to major transportation corridors.

Future individual development projects under the College Area CPU would be required to comply with applicable City regulations related to emergency access, including the City's Fire Code and the SDMC and would be forwarded to the City Fire Marshall to ensure adequate emergency access. Future discretionary projects would also be reviewed for consistency with the CPU's policies related to emergency access. As future site-specific development consistent with the College Area CPU is proposed, the City would consider the adequacy of emergency access and emergency evacuation routes. Generally, the anticipated location of development would have ready access to transit and major transportation corridors. Through adherence to the regulatory and policy framework, combined with the proposed roadway network improvements, impacts related to emergency response and evacuation would be less than significant. Therefore, the proposed project is consistent with the impact conclusions identified in the Blueprint SD PEIR for wildfires relative to emergency response and evacuation, and would not result in new significant impacts or a Fsubstantial increase in the severity of previously identified impacts.

V.18.3 Pollutants from Wildfire

Blueprint SD PEIR

Wildfire impacts related to pollutants from wildfire are evaluated in Section 4.18.4 (Issue 3) of the Blueprint SD PEIR.

The Blueprint SD PEIR concluded that future development that would occur under the Blueprint SD Initiative, Hillcrest FPA, and University CPU would be required to comply with the City's Fire Code, Building Regulations, and Brush Management Regulations to ensure that wildfire risks are not

exacerbated. While it is not anticipated that future development would exacerbate wildfire risk, residents may be exposed to pollutant concentrations associated with wildfire and/or the uncontrolled spread of a wildfire. The Blueprint SD PEIR determined that in the absence of project-specific information to evaluate site conditions such as slope and prevailing winds, it is not possible to conclude that future development and actions anticipated under the Blueprint SD Initiative, Hillcrest FPA, and University CPU would not exacerbate wildfire risks. Therefore, the Blueprint SD PEIR concluded at a program level of review, direct and cumulative impacts related to exacerbation of wildfire risks resulting in exposure of project occupants to pollutant concentrations from a wildfire or uncontrolled spread of a wildfire would be significant.

Future plan amendments in the College Area CPU area that are proposed consistent with the Blueprint SD Initiative and the Village Climate Goal Propensity Map would be required to implement Blueprint SD PEIR MM-FIRE-1 which requires an evaluation of the adequacy of evacuation routes, emergency access, and fire safety in light of the proposed land use and mobility network. The Blueprint SD PEIR also includes mitigation measure MM-FIRE-2 which requires future discretionary projects to demonstrate consistency with the City's applicable regulatory and policy framework such as the Fire Code, the City's Building Regulations, and the City's Brush Management Regulations and Landscape Standards, as well as consistency with the California Office of the Attorney General issued guidance outlining best practices for analyzing and mitigating wildfire impacts of development projects under CEQA for projects with a higher level of wildfire or evacuation risk, as determined by the City. However, at a program level of review and without community-specific evaluation and project-specific details available for site-specific evaluation, the Blueprint SD PEIR concluded direct and cumulative impacts would be significant and unavoidable.

College Area CPU

As previously described, the northwest portion of the College Area CPU area is located within or adjacent to a Very High Fire Hazard Severity Zone, as depicted in Figure 13, *Very High Fire Hazard Severity Zones*. The potential for pollutant concentrations from a wildfire represents a potential hazard, particularly within these areas and other areas adjacent to open space or within close proximity to wildland fuels.

Future site-specific development that would occur under the College Area CPU would be required to comply with the City's Fire Code, Building Regulations, and Brush Management Regulations and Landscape Standards to ensure that wildfire risks are not exacerbated. While it is not anticipated that subsequent development would exacerbate wildfire risk, residents may be exposed to pollutant concentrations associated with wildfire and/or the uncontrolled spread of a wildfire. At this program level of review with the absence of project-specific information to evaluate site conditions such as slope and prevailing winds, it is not possible to conclude that the College Area CPU along with all future development and actions anticipated under the College Area CPU would not exacerbate wildfire risks. Therefore, at a program level of review, impacts would be significant.

Future plan amendments in the College Area CPU area that are proposed consistent with the Blueprint SD Initiative and the Village Climate Goal Propensity Map would be required to implement Blueprint SD PEIR MM-FIRE-1 which requires an evaluation of the adequacy of evacuation routes, emergency access, and fire safety in light of the proposed land use and mobility network. Additionally, future site-specific discretionary projects under the College Area CPU would be

required to implement Blueprint SD PEIR MM-FIRE-2, which reinforces required compliance with the City's applicable regulatory and policy framework such as the Fire Code, City's Building Regulations, and the City's Brush Management Regulations and Landscape Standards. In general, project-level compliance with the City's Building Regulations, Fire Code, and Brush Management Regulations and Landscape Standards would ensure impacts related to wildfire would be reduced to less than significant. Future discretionary projects with a higher level of wildfire or evacuation risk, as determined by the City, would also be required to provide additional analysis demonstrating consistency with the California Office of the Attorney General issued guidance outlining best practices for analyzing and mitigating wildfire impacts of development projects under CEQA in accordance with MM-FIRE-2. Furthermore, at a project level of review additional project features and/or project-specific mitigation measures could be identified which would minimize potential wildfire impacts. However, at a program level of review and without project-specific details available for site-specific evaluation, potential impacts cannot be known with certainty. Therefore, impacts would be significant and unavoidable. Therefore, the proposed project is consistent with the impact conclusions identified in the Blueprint SD PEIR relative to pollutants from wildfire, and would not result in new significant impacts or a substantial increase in the severity of previously identified impacts.

V.18.4 Infrastructure

Blueprint SD PEIR

Wildfire impacts related to infrastructure are evaluated in Section 4.18.4 (Issue 4) of the Blueprint SD PEIR.

The Blueprint SD PEIR noted that there are some areas within the Blueprint SD Initiative, Hillcrest FPA, and University CPU areas that may have existing infrastructure deficiencies and may require capacity improvements to serve future projects implemented under the Blueprint SD Initiative, Hillcrest FPA, and University CPU. Given that future specific development projects are unknown at this time, physical impacts associated with installation of and/or improvements to utilities infrastructure would be significant. Future utility and infrastructure improvements would be required to comply with applicable City standards and thus, these improvements are not likely to exacerbate fire risk. However, the Blueprint SD PEIR concluded at the program level of review, potential temporary or ongoing direct and cumulative impacts to the environment due to the installation or maintenance of infrastructure would be significant.

Future plan amendments in the College Area CPU area that are proposed consistent with the Blueprint SD Initiative and the Village Climate Goal Propensity Map would be required to implement Blueprint SD PEIR MM-FIRE-1 which requires an evaluation of the adequacy of evacuation routes, emergency access, and fire safety in light of the proposed land use and mobility network. The Blueprint SD PEIR also includes mitigation measure MM-FIRE-2 which requires future discretionary projects to demonstrate consistency with the City's applicable regulatory and policy framework such as the Fire Code, the City's Building Regulations, and the City's Brush Management Regulations and Landscape Standards, as well as consistency with the California Office of the Attorney General issued guidance outlining best practices for analyzing and mitigating wildfire impacts of development projects under CEQA for projects with a higher level of wildfire or evacuation risk, as determined by the City. However, at a program level of review and without community-specific

evaluation and project-specific details available for site-specific evaluation, the Blueprint SD PEIR concluded direct and cumulative impacts would be significant and unavoidable.

College Area CPU

The College Area CPU area is located within an existing urbanized area that is served by stormwater, sewer, electricity, potable water distribution, and communications systems infrastructure. The CPU area is served by existing roadways that would not require fuel breaks or other measures to reduce wildfire risk, and no new major roadways are proposed. Nevertheless, there could be areas within the College Area CPU area that have existing infrastructure deficiencies and may require capacity improvements to serve future projects implemented under the College Area CPU. Future utility and infrastructure improvements would be required to comply with applicable City standards.

Mandatory compliance with City regulations would likely avoid or minimize environmental impacts associated with future construction and/or improvements to the existing utility infrastructure.

However, given that future specific development projects are unknown at this time, it cannot be determined whether the installation of such infrastructure would have the potential to exacerbate fire risk. Therefore, the physical impacts associated with installation or maintenance of infrastructure and utilities would be significant.

Future plan amendments in the College Area CPU area that are proposed consistent with the Blueprint SD Initiative and the Village Climate Goal Propensity Map would be required to implement Blueprint SD PEIR MM-FIRE-1 which requires an evaluation of the adequacy of evacuation routes, emergency access, and fire safety in light of the proposed land use and mobility network. Future discretionary development projects implemented under the College Area CPU would also be required to implement Blueprint SD PEIR MM-FIRE-2, which reinforces required compliance with the City's applicable regulatory and policy framework such as the Fire Code, Building Regulations, and Brush Management Regulations and Landscape Standards. Future discretionary projects with a higher level of wildfire or evacuation risk, as determined by the City, would also be required to provide additional analysis demonstrating consistency with the California Office of the Attorney General issued guidance outlining best practices for analyzing and mitigating wildfire impacts of development projects under CEQA in accordance with MM-FIRE-2. Furthermore, at a project level of review additional project features and/or project-specific mitigation measures could be identified which would minimize potential wildfire impacts. In general, project-level regulatory compliance would ensure impacts related to wildfire would be reduced to less than significant. However, at a program level of review and without project-specific details available for site-specific evaluation, potential impacts cannot be known with certainty. Impacts would be significant and unavoidable. Therefore, the proposed project is consistent with the impact conclusions identified in the Blueprint SD PEIR for wildfires relative to infrastructure, and would not result in new significant impacts or a substantial increase in the severity of previously identified impacts.

V.18.5 Flooding or Landslides

Blueprint SD PEIR

Wildfire impacts related to flooding or landslides are evaluated in Section 4.18.4 (Issue 5) of the Blueprint SD PEIR.

The Blueprint SD PEIR concluded while the Blueprint SD Initiative, Hillcrest FPA, and University CPU areas could be subject to risks associated with downstream flooding or landslides, the existing regulatory framework related to flooding and geologic hazards would minimize potential risks. Although individual developments would typically be able to avoid impacts associated with the exposure of people or structures to risk resulting from runoff, post-fire slope instability or drainage changes through required compliance with City regulations, the Blueprint SD PEIR determined at a program level of review the significance of impacts cannot be determined. At the time of individual developments, evaluation of site-specific conditions would be required. Therefore, in the absence of project-specific information, the Blueprint SD PEIR concluded that direct and cumulative impacts related to the exposure of people and/or structures to significant risks because of runoff, post-fire slope instability or drainage changes would be significant.

Future plan amendments in the College Area CPU area that are proposed consistent with the Blueprint SD Initiative and the Village Climate Goal Propensity Map would be required to implement Blueprint SD PEIR MM-FIRE-1 which requires an evaluation of the adequacy of evacuation routes, emergency access, and fire safety in light of the proposed land use and mobility network. The Blueprint SD PEIR also includes mitigation measure MM-FIRE-2 which requires future discretionary projects to demonstrate consistency with the City's applicable regulatory and policy framework such as the Fire Code, the City's Building Regulations, and Brush Management Regulations and Landscape Standards, as well as consistency with the California Office of the Attorney General issued guidance outlining best practices for analyzing and mitigating wildfire impacts of development projects under CEQA for projects with a higher level of wildfire or evacuation risk, as determined by the City. However, at a program level of review and without project-specific details available for site-specific evaluation, the Blueprint SD PEIR concluded direct and cumulative impacts would be significant and unavoidable.

College Area CPU

As discussed in Section V.9.3 of this Addendum, impacts related to flooding would be significant primarily due to the fact that the proposed project could facilitate and increase development potential within areas that could be subject to flooding hazards, such the northeast portion of the College Area CPU area that is mapped within flood hazard zones. Potential impacts associated with landslides are discussed in Section V.6.3. As discussed, there are no mapped areas within the College Area CPU area located on the City's Seismic Safety Study that are susceptible to landslides or have landslide-prone formations (City 2008).

Where future development consistent with the College Area CPU is proposed in areas with wildfire risk, landslide, and/or flooding issues, the potential for the project to exacerbate wildfire risk, resulting in downstream flooding or landslides as a result of runoff, post-fire slope instability, or drainage changes could be significant. As discussed in Section V.6, *Geology and Soils*, future development projects would be required to implement site-specific recommendations provided within the required project-specific geotechnical investigations to ensure individual projects would not increase risks associated with landslides and slope stability.

While the College Area CPU area could be subject to risks associated with downstream flooding or landslides, the existing regulatory framework related to flooding and geologic hazards would minimize potential risks. Although individual developments would typically avoid impacts associated

with the exposure of people or structures to risk resulting from runoff, post-fire slope instability or drainage changes through required compliance with wildfire related regulations along with compliance with geotechnical and hydrology studies, at a program level of review, the significance of impacts cannot be determined. Therefore, in the absence of project-specific information, impacts related to the exposure of people and/or structures to significant risks because of runoff, post-fire slope instability or drainage changes would be significant.

Future plan amendments in the College Area CPU area that are proposed consistent with the Blueprint SD Initiative and the Village Climate Goal Propensity Map would be required to implement Blueprint SD PEIR MM-FIRE-1 which requires an evaluation of the adequacy of evacuation routes, emergency access, and fire safety in light of the proposed land use and mobility network. Future discretionary development projects implemented under the College Area CPU would also be required to implement Blueprint SD PEIR MM-FIRE-2, which reinforces required compliance with the City's applicable regulatory and policy framework such as the Fire Code, the City's Building Regulations, and Brush Management Regulations and Landscape Standards. Future discretionary projects with a higher level of wildfire or evacuation risk, as determined by the City, would also be required to provide additional analysis demonstrating consistency with the California Office of the Attorney General issued guidance outlining best practices for analyzing and mitigating wildfire impacts of development projects under CEQA in accordance with MM-FIRE-2. Furthermore, at a project level of review additional project features and/or project-specific mitigation measures could be identified which would minimize potential wildfire impacts. In general, project-level regulatory compliance would ensure impacts related to wildfire would be reduced to less than significant. However, at a program level of review and without project-specific details available for site-specific evaluation, potential impacts cannot be known with certainty. Impacts would be significant and unavoidable. Therefore, the proposed project is consistent with the impact conclusions identified in the Blueprint SD PEIR for wildfires relative to flooding or landslides, and would not result in new significant impacts or a substantial increase in the severity of previously identified impacts.

V.18.6 Conclusion

Based on the foregoing analysis and information, there is no evidence that the College Area CPU would require a major change to the Blueprint SD PEIR related to wildfire. The project, as a proposed CPU, has implemented and satisfied the requirements of Blueprint SD PEIR MM-FIRE-1. Consistent with the analysis in the Blueprint SD PEIR, wildfire impacts related to wildfire hazards, pollutants from wildfire, infrastructure, and flooding or landslides resulting from the project would be significant and unavoidable even with implementation of Blueprint SD PEIR mitigation measures MM-FIRE-1 and MM-FIRE-2 at a program level of review.

The Blueprint SD PEIR concluded that wildfire impacts related to emergency response and evacuation would be less than significant. Consistent with the analysis in the Blueprint SD PEIR, the project would not substantially impair an adopted emergency response plan or emergency evacuation plan and wildfire impacts relative to emergency response and evacuation would be less than significant. The College Area CPU would not result in any new significant wildfire impacts, nor would it result in a substantial increase in the severity of wildfire impacts from those described in the Blueprint SD PEIR.

VI. ISSUES NOT ANALYZED IN THE PREVIOUS EIR

CEQA Guidelines Section 15128, allows environmental issues for which there is no likelihood of a significant impact to not be discussed in detail or analyzed further in an EIR. The Blueprint SD PEIR determined that implementation of the Blueprint SD Initiative, Hillcrest FPA, and University CPU would have less than significant impacts relative to Agriculture and Forestry Resources, Mineral Resources, and Population and Housing.

Agriculture and Forestry Resources

Like the conclusions of the Blueprint SD PEIR, the College Area CPU area is not zoned for agriculture nor are there existing forestlands, timberlands, timberland zoned Timberland Production, or lands under a Williamson Act contract. The College Area CPU area is an existing urbanized area and therefore, there is no likelihood that implementation of the College Area CPU would have a significant impact on agriculture and forestry resources.

Mineral Resources

Consistent with the conclusions in the Blueprint SD PEIR, implementation of the College Area CPU would not result in a loss of availability of a locally important mineral resource recovery site delineated on any local or general plan due to the low feasibility of a mining operation within a highly developed urban environment. Therefore, there is no likelihood that implementation of the College Area CPU would have a significant impact on mineral resources.

Population and Housing

Consistent with the conclusions of the Blueprint SD PEIR, implementation of the College Area CPU would accommodate projected population and housing needs within the City and would not induce unplanned population growth as there is a need for housing to serve projected population levels. Future construction associated with individual development projects under the College Area CPU would require labor that would be met by the local labor force within San Diego County or the surrounding areas and would not require the import of a substantial number of workers that could cause an increased demand for temporary or permanent housing. In addition, it is anticipated that the majority of new housing units proposed under the College Area CPU would be absorbed by existing residents of the San Diego area and would assist in accommodating projected population growth that would occur without the College Area CPU. Therefore, there is no likelihood that implementation of the College Area CPU would have a significant population and housing impact as the College Area CPU would not induce substantial unplanned growth, directly or indirectly, nor will it displace people or existing housing. Impacts would be less than significant and consistent with the Blueprint SD PEIR.

Conclusion

Through the environmental analysis conducted, the City has determined that the current project would not have the potential to cause significant impacts to the issue areas analyzed above. While these issues were not analyzed in detail, as outlined in CEQA Guidelines Section 15128, there is no

new information available that would indicate that the proposed CPU would result in new significant impacts or a substantial increase in the severity of impacts as compared to the Blueprint SD PEIR.

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

The project shall be required to comply with applicable mitigation measures outlined within the MMRP of the previously certified Blueprint SD PEIR (SCH No. 2021070359). As discussed in Section V.14.2, Vehicle Miles Traveled, of this Addendum, an analysis of VMT impacts was conducted pursuant to MM-TRANS-2 as required by the Blueprint SD PEIR. Therefore, the requirements of MM-TRANS-2 have been completed and this mitigation measure has been removed from this MMRP for future projects in the College Area CPU area. Minor modifications have also been made to MM-HIST-2 to address repatriation, as appropriate, of cultural resources; to clarify that the City's cultural resources sensitivity map shall be reviewed at the initial planning stage of a project; to clarify when Native American participation shall be required for all subsurface investigations; and to clarify that curation that involves federal funding shall be accomplished in accordance with Title 36 of the Code of Federal Regulations Part 79. The revised MM-HIST-2 shall apply to all future projects which tier from the Blueprint SD PEIR. The revisions to MM-HIST-2 are reflected in a ~~strikeout~~/underline format. The following MMRP identifies the Blueprint SD PEIR mitigation measures that specifically apply to this project.

Air Quality

Blueprint SD PEIR MM-AQ-1 – Air Emissions

Future ministerial and discretionary projects shall comply with all applicable regulations pertaining to air quality including but not limited to SDAPCD Rule 20 through 20.8, Rule 50, Rule 51, Rule 52, Rule 55, and Rule 67.1. Construction and operation of individual discretionary development projects shall not exceed criteria pollutant significance thresholds detailed in the latest City's CEQA Significance Thresholds.

Blueprint SD PEIR MM-AQ-2 – Sensitive Receptors

Future projects consistent with the project that would involve stationary source emissions subject to APCD permitting shall be required to obtain applicable APCD permits and demonstrate consistency with all permit conditions and APCD rules consistent with SDAPCD's Title V Operating Permit Program which implements Title V of the Federal Clean Air Act.

Future discretionary development that involves heavy industrial land uses such as warehousing and distribution or other land uses that would involve substantial sources of mobile source diesel emissions shall be required to prepare a health risk assessment (HRA) in accordance with SDAPCD HRA Guidelines and the Office of Environmental Health Hazard Assessment (OEHHA) Air Toxics "Hot Spots" Program Risk Assessment Guidelines (OEHHA 2015). The HRA shall include calculation of the excess cancer risk and the non-cancer chronic and acute health hazard index (HHI) for the maximally exposed individual resident (MEIR), and the maximally exposed individual worker (MEIW). The HRA

shall identify best available control technology (BACT) required to reduce risk to less than 10 in 1,000,000.

Blueprint SD PEIR MM-AQ-3 – Odors

Any discretionary project with the potential to result in objectionable odors shall be required to demonstrate compliance with SDAPCD Rule 51 (Public Nuisance), which prohibits the discharge of air contaminants or other materials that would be a nuisance or annoyance to the public. Additionally, application of SDMC Section 142.0710 prohibits odors to emanate beyond the boundaries of the premises upon which the use emitting the contaminants is located, where it endangers human health, causes damage to vegetation or property, or causes soiling.

Biological Resources

Blueprint SD PEIR MM-BIO-1 – Impacts to Sensitive Biological Resources

Future projects that could directly and/or indirectly impact sensitive species, sensitive habitats and/or wetlands shall comply with the City's Environmentally Sensitive Lands (ESL) Regulations, Biology Guidelines, and applicable federal, state, and local Habitat Conservation Plans including, but not limited to, the City's Multiple Species Conservation Program (MSCP) Subarea Plan and Vernal Pool Habitat Conservation Plan (VPHCP) and shall implement avoidance, minimization, and mitigation measures in accordance with the City's ESL Regulations, Biology Guidelines, and MSCP Subarea Plan (SAP), and VPHCP.

Cultural Resources

Blueprint SD PEIR MM-HIST-1 – Historic Resources

Future development that could directly and/or indirectly affect a historical building, structure, or object as defined in the City's Historical Resources Regulations and Historical Resources Guidelines shall comply with the City's Historical Resources Guidelines and Historical Resources Regulations (SDMC sections 143.0201–143.0280) and shall be required to implement avoidance, minimization, and mitigation measures in accordance with the City's Historical Resources Regulations and Historical Resources Guidelines.

Blueprint SD PEIR MM-HIST-2 – Archaeological and Tribal Cultural Resources

Prior to the issuance of any discretionary permit for a future development project that could directly and/or indirectly affect a cultural resource (i.e. archaeological and Tribal Cultural Resources), the City shall require the following steps be taken to determine (1) the potential presence and/or absence of cultural resources, and (2) the appropriate mitigation for any significant resources that may be impacted. For the purposes of CEQA review, a cultural resource is defined in CEQA Guidelines Section 15064.5. Tribal cultural resources are defined in PRC Section 21074.

Initial Determination

The City's Environmental Designee shall determine the potential presence and/or absence of cultural resources at the project site by reviewing site photographs and existing historic information (e.g., Archaeological Sensitivity Maps, the Archaeological Map Book, the California Historical Resources Inventory System, and the City's "Historical Inventory of Important Architects, Structures, and People in San Diego") and may conduct a site visit. A review of the City's cultural resources sensitivity map (~~see Addendum Figure 15~~) shall be done at the initial planning stage of a project to ensure that cultural resources are avoided and/or impacts are minimized to the extent feasible in accordance with the City's Historical Resources Guidelines. The sensitivity levels described below shall guide the appropriate steps necessary to address the potential resources. Sensitivity ratings may be adjusted based on the amount of disturbance that has occurred, which may have previously impacted cultural resources, as well as new data available to the City.

High Sensitivity: Indicates locations where significant cultural resources have been documented or would have the potential to be identified. High sensitivity resources include village and habitation sites and areas near fresh water sources. These resources may range from moderately complex to highly complex, with more defined living areas or specialized work space areas, and a large breadth of features and artifact assemblages. The potential for identification of additional resources in such areas would be high.

Moderate Sensitivity: Indicates that some cultural resources have been recorded within the area or the area was developed before 1984 when CEQA review may not have been applied. Moderate sensitivity resources consist of diversity or density of feature and artifact types (e.g., a moderately dense lithic scatter).

Low Sensitivity: Indicates areas where there is a high level of disturbance or development, and few or no previously recorded cultural resources are present based on records search results and due to the timing of development of the project site occurring after 1984 when CEQA would have been applied. Within these areas, the potential for additional resources to be identified would be low.

Phase I

Based on the results of the initial determination, if there is any evidence that the project area contains archaeological and/or Tribal Cultural Resources, a site-specific records search and/or survey may be required and shall be determined on a case-by-case basis by the City's Environmental Designee. If a cultural resources study is required, it shall be prepared consistent with the City's Historical Resources Guidelines. All individuals conducting any phase of the cultural resources program shall meet the professional qualifications in accordance with the City's Historical Resources Guidelines. The cultural resources study shall include the background research conducted as part of the initial determination. This includes a record search at the SCIC at San Diego State University. A review of the Sacred Lands File maintained by the NAHC shall also be conducted at this time. The cultural resources study shall include a field survey and/or an evaluation of significance, as applicable if cultural resources are identified, based on the City's Historical Resources Guidelines. Native American participation shall be required for all field work.

Phase II

Once a cultural resource (as defined in the PRC) has been identified, a significance determination shall be made. If a project were to impact areas identified as low sensitivity, it is assumed that any significant cultural resources no longer hold integrity or are not present. If a project impacts these areas, no additional mitigation measures shall be required.

If a project were to impact areas identified as moderate sensitivity, a site-specific records search and/or survey may be required on a case-by-case basis. If cultural resources are identified in the records search and/or survey, a significance evaluation for the identified cultural resources shall be required. If no significant resources are found and site conditions are such that there is no potential for further discoveries, then no further action shall be required. Resources found to be non-significant as a result of a survey and/or assessment shall require no further work beyond documentation of the resources on the appropriate Department of Parks and Recreation site forms and inclusion of the results in the survey and/or assessment report. If no significant resources are found, but results of the initial evaluation indicate there is still a potential for resources to be present in portions of the property, then mitigation monitoring shall be required. If the resource has not been evaluated for significance, a testing plan shall be required. If the resource is determined to be significant, a testing plan, data recovery plan, and mitigation monitoring shall be required.

If a project were to impact areas identified as high sensitivity, a survey and testing program may be required by the qualified archaeologist to further define resource boundaries subsurface presence or absence and determine the level of significance. A thorough discussion of testing methodologies including surface and subsurface investigations can be found in the City's Historical Resources Guidelines. The results from the testing program shall be evaluated against the Significance Thresholds found in the City's Historical Resources Guidelines. If significant cultural resources are identified within the area of potential effects, the site may be eligible for local designation.

Preferred mitigation for direct and/or indirect impacts to cultural resources is to avoid the resource through project redesign. If the resource cannot be entirely avoided, all prudent and feasible measures to minimize harm shall be taken. Mitigation measures such as, but not limited to, a Research Design and Archaeological Data Recovery Program (ADRP), construction monitoring, site designation, capping, granting of deeds, designation of open space, and avoidance and/or preservation shall be required and shall be determined by the City's Environmental Designee on a case-by-case basis.

Phase III

Archaeological Data Recovery Program

If a cultural resource is found to be significant and preservation is not an option, a Research Design and ARDP shall be required, which includes a Collections Management Plan for review and approval by the City's Environmental Designee. The ARDP shall be based on a written research design and is subject to the provisions as outlined in PRC Section 21083.2. The ARDP shall be reviewed and approved by the City's Environmental Designee prior to distribution of a draft CEQA document.

Local Designation of Resources

The final cultural resource evaluation report shall be submitted to Historical Resources Board (HRB) staff for designation. The final cultural resource evaluation report and supporting documentation will be used by HRB staff in consultation with qualified City staff to ensure that adequate information is available to demonstrate eligibility for designation under the applicable criteria.

Monitoring and Archaeological Resource Reports

Archaeological monitoring may be required during building demolition and/or construction grading when significant cultural resources are known or suspected to be present on a site but cannot be recovered prior to grading due to obstructions such as, but not limited to, existing development, dense vegetation, or if a data recovery did not reduce the impact to the resource. Monitoring shall be documented in a consultant site visit record.

Native American participation shall be required for all subsurface investigations, including geotechnical testing and other ground disturbing activities whenever a tribal cultural resource or any archaeological site is present. In the event that human remains are encountered during data recovery and/or a monitoring program, the provisions of PRC Section 5097 shall be followed. In the event that human remains are discovered during project grading, work shall halt in that area and the procedures set forth in the PRC (Section 5097.98) and State Health and Safety Code (Section 7050.5), and in the federal, state, and local regulations described above shall be undertaken. These provisions shall be outlined in the Mitigation Monitoring and Reporting Program included in a subsequent project-specific environmental document. The Most Likely Descendent shall be consulted during the preparation of the written report, at which time they may express concerns about the treatment of sensitive resources.

Archaeological Resource Reports shall be prepared by qualified professionals as determined by the criteria set forth in Appendix B of the City's Historical Resources Guidelines. In the event that a cultural resource deposit is encountered during construction monitoring, a Collections Management Plan shall be required in accordance with the project's Mitigation Monitoring and Reporting Program. The disposition of human remains and burial related artifacts that cannot be avoided or are inadvertently discovered is governed by State (i.e., AB 2641 [Coto] and California Native American Graves and Repatriation Act [NAGPRA] of 2001 [Health and Safety Code 8010-8011]) and federal (i.e., federal NAGPRA United States Code 3001-3013)) law, and must be treated in a dignified and culturally appropriate manner with respect for the deceased individual(s) and their descendants. Any human bones and associated grave goods of Native American origin shall be turned over to the appropriate Native American group for repatriation, as identified by the Native American Heritage Commission.

Arrangements for long-term curation and/or repatriation, as determined appropriate by the City Environmental Designee, must be established between the applicant/property owner and the consultant prior to the initiation of the field reconnaissance, and must be included in the archaeological survey, testing and/or data recovery report submitted to the City for review and approval. Curation must be accomplished in accordance with the California State Historic Resources Commission's Guidelines for the Curation of Archaeological Collection (dated May 7, 1993) and, if

federal funding is involved, Title 36 of the Code of Federal Regulations Part 79. Additional information regarding curation is provided in Section II of the Historical Resources Guidelines.

Noise

Blueprint SD PEIR MM-NOI-1 – Noise Abatement and Control Ordinance

Future projects shall be required to comply with the construction noise levels limits defined by San Diego Municipal Code Section 59.5.0404. If construction noise would exceed the construction noise limits, a permit would be required from the Noise Abatement and Control Administrator in accordance with SDMC Section 59.5.0404, which may include the incorporation of site specific noise reduction measures to meet property line limitations.

Future development with stationary sources of noise shall comply with Section 59.5.0401 et seq. of the SDMC, which specifies the maximum one-hour average sound level limits allowed at the boundary of a property.

Blueprint SD PEIR MM-NOI-2 – Vibration Construction Activities

Future projects that include pile driving and would result in vibration levels exceeding the peak particle velocity (PPV) and screening distances detailed in Table 4.11-2 shall implement vibration reduction measures to minimize construction-related vibration impacts. Measures shall be based on the results of site-specific recommendations from an acoustical analysis. Measures may include, but are not limited to, limiting the use of vibration-intensive equipment in proximity to sensitive receptors, installing low soil displacement piles (e.g., H-piles) instead of high soil displacement piles (e.g., concrete piles) for pile-driving, and pre-drilling for pile-driving. Other measures may include pre- and post-construction inspections to document any damage and provide repairs in the event damage occurs.

Transportation

Blueprint SD PEIR MM-TRANS-1 – Achieve VMT Reductions

Future development shall be required to demonstrate compliance with the City's Mobility Choices Ordinance (SDMC Section 143.1103 et seq.) and the City's TSM, including preparation of a VMT analysis and Local Mobility Analysis, where applicable.

Tribal Cultural Resources

Refer to **Blueprint SD PEIR MM-HIST-2 – Archaeological and Tribal Cultural Resources** above.

Wildfire

Blueprint SD PEIR MM-FIRE-1 – Wildfire Policy Compliance for Plan Amendments

As future Community Plan Updates or other plan amendments are proposed consistent with the Blueprint SD Initiative and the Village Climate Goal Propensity Map, the City shall evaluate the adequacy of evacuation routes, emergency access and fire safety in light of the proposed land use and mobility network. The City plan amendment process shall include a review of consistency with Policy LU-C.2.A.5, Policy UD-A.3.h, Policy UD-A.3.p, Policy PF-D.12, Policy PF-D.13, Policy PF-D.14, Policy PF-D.15, and Policy PF-D.16.

Blueprint SD PEIR MM-FIRE-2 – Wildfire Safety Policies and Regulation Compliance

Future projects shall be required to demonstrate consistency with the City's applicable regulatory and policy framework including:

- The latest update to the Fire Code (SDMC Sections 55.0101 through 55.9401), including requirements for adequate fire access and specifications for when two separate fire apparatus access roads are required.
- The latest update to the City's Building Regulations (SDMC Chapter 14, Article 5) including acceptable construction materials for development near open space (SDMC Chapter 14, Article 5, Division 7).
- The City's Brush Management Regulations (SDMC Section 142.0412) and Landscape Standards, adopted as part of the Land Development Manual.

For discretionary projects with a higher level of wildfire or evacuation risk, due to site and/or project specific factors, as determined by the City, additional analysis demonstrating consistency with the California Office of the Attorney General issued guidance outlining best practices for analyzing and mitigating wildfire impacts of development projects under CEQA may be required.

VIII. SIGNIFICANT AND UNAVOIDABLE IMPACTS

The Blueprint SD PEIR in Chapter 7, *Significant Unavoidable Impacts/Significant Irreversible Environmental Changes*, identifies significant and unavoidable impacts for several environmental issues, as summarized below in Table 10, *Summary of Blueprint SD PEIR Significant and Unavoidable Impacts*.

Table 10
SUMMARY OF BLUEPRINT SD PEIR SIGNIFICANT AND UNAVOIDABLE IMPACTS

Environmental Topic/Issue	Direct	Cumulative
<i>Aesthetics</i>		
Scenic Vistas	X	X
Scenic Highways	X	X
Visual Character, Quality of Public Views, and Scenic Quality	X	X
Shade	X	X
<i>Air Quality</i>		
Conflicts with Air Quality Plans	X	X

Table 10
SUMMARY OF BLUEPRINT SD PEIR SIGNIFICANT AND UNAVOIDABLE IMPACTS

Environmental Topic/Issue	Direct	Cumulative
Air Quality Standards	X	X
Sensitive Receptors	X	
Odors	X	
Biological Resources		
Sensitive Species	X	X
Sensitive Habitats	X	X
Wetlands	X	X
Cultural Resources		
Historic Structures, Objects, or Sites	X	X
Archaeological Resources	X	X
Hydrology		
Inundation (Flood Flows)	X	
Noise		
Ambient Noise Levels	X	X
Groundborne Vibration	X	X
Public Services		
Public Facilities (Fire Protection, Police Protection, Schools, Libraries)	X	X
Recreation		
Deterioration of Parks and Recreation Facilities	X	X
Construction or Expansion of Recreational Facilities	X	X
Transportation		
VMT	X	X
Tribal Cultural Resources		
Tribal Cultural Resources	X	X
Utilities and Service Systems		
New or Expanded Utilities	X	
Adequate Wastewater Capacity	X	X
Wildfire		
Wildfire Hazards	X	X
Pollutants from Wildfire	X	X
Infrastructure	X	X
Flooding and Landslides	X	X

Because there were significant unmitigated impacts associated with the original project approval, the decision maker was required to make specific and substantiated “CEQA Findings” which stated: (a) specific economic, social, or other considerations which make infeasible the mitigation measures or project alternatives identified in the Final Blueprint SD PEIR, and (b) the impacts have been found acceptable because of specific overriding considerations. Given that there are no new or more severe significant impacts that were not already addressed in the previously certified Blueprint SD PEIR, new CEQA Findings and/or Statement of Overriding Considerations are not required.

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

IX. CERTIFICATION

Copies of this Addendum, the certified Blueprint SD 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>



Rebecca Malone, Program Manager, AICP
City Planning Department, City of San Diego

10/2/2025

Date of Final Report

Analysts: T. Ash-Reynolds/E. Pascual/E. Ramirez Manriquez

Figures:

- Figure 1: Regional Location
- Figure 2: USGS Topography
- Figure 3: Aerial Photograph
- Figure 4: Proposed Land Use
- Figure 5: Planned Pedestrian Network
- Figure 6: Planned Bicycle Network
- Figure 7: Planned Street Classifications
- Figure 8: Planned Transit Network
- Figure 9: Parks
- Figure 10: Vegetation Communities and Land Cover Types
- Figure 11: Open Spaces and Multi-Habitat Planning Area
- Figure 12: Public Facilities
- Figure 13: Very High Fire Hazard Severity Zones
- Figure 14: Cultural Sensitivity
- Figure 15: Community Enhancement Overlay Zone Area & Greenways

Technical Reports:

- Attachment 1: Biological Resources Report
- Attachment 2: Historic Context Statement
- Attachment 3: Cultural Resources Constraints and Sensitivity Analyses
- Attachment 4: VMT Analysis
- Attachment 5: Water Supply Assessment

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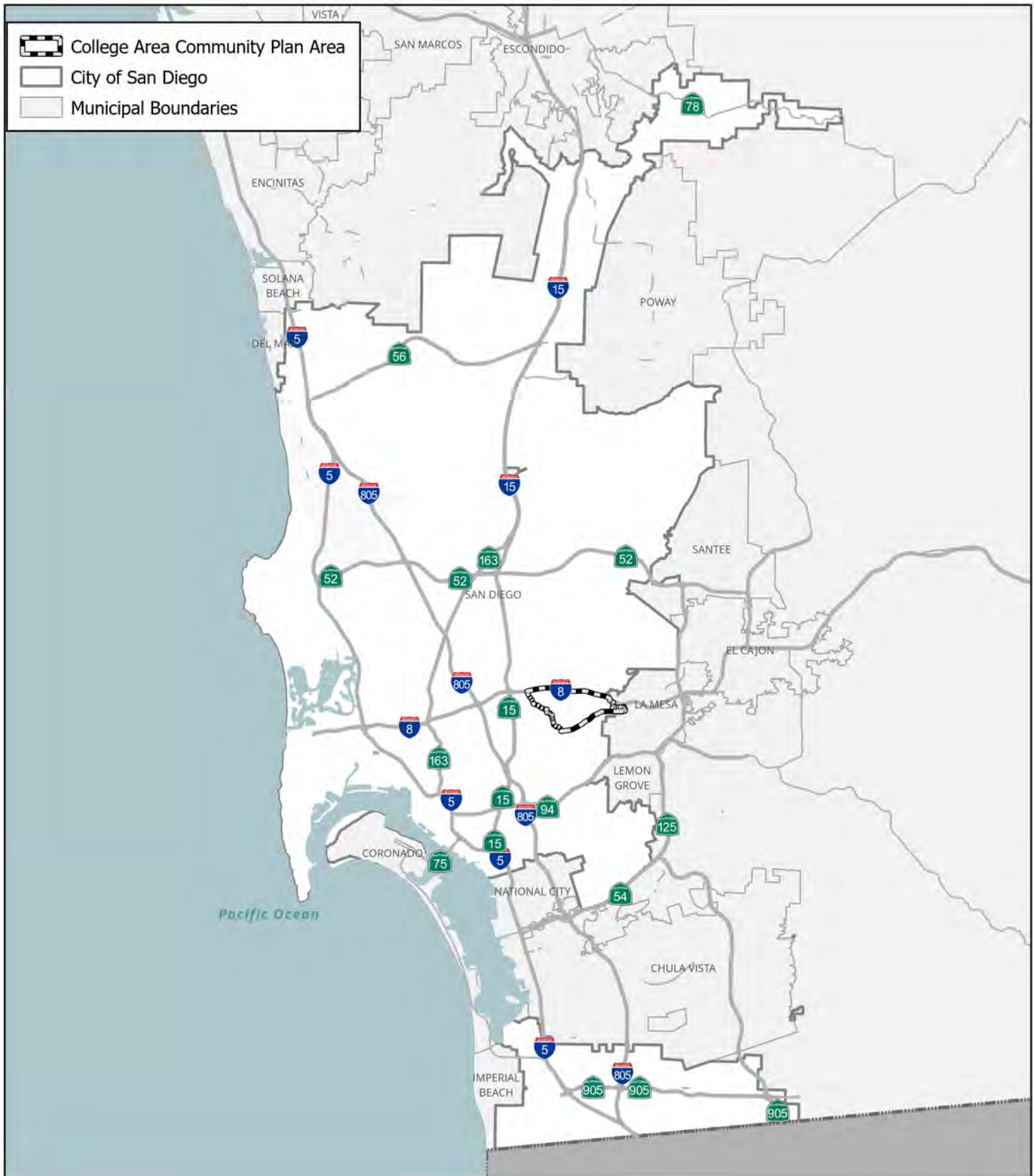
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0 4,500 9,000 13,500

Figure 1
Regional Location



Figure 2
USGS Topography

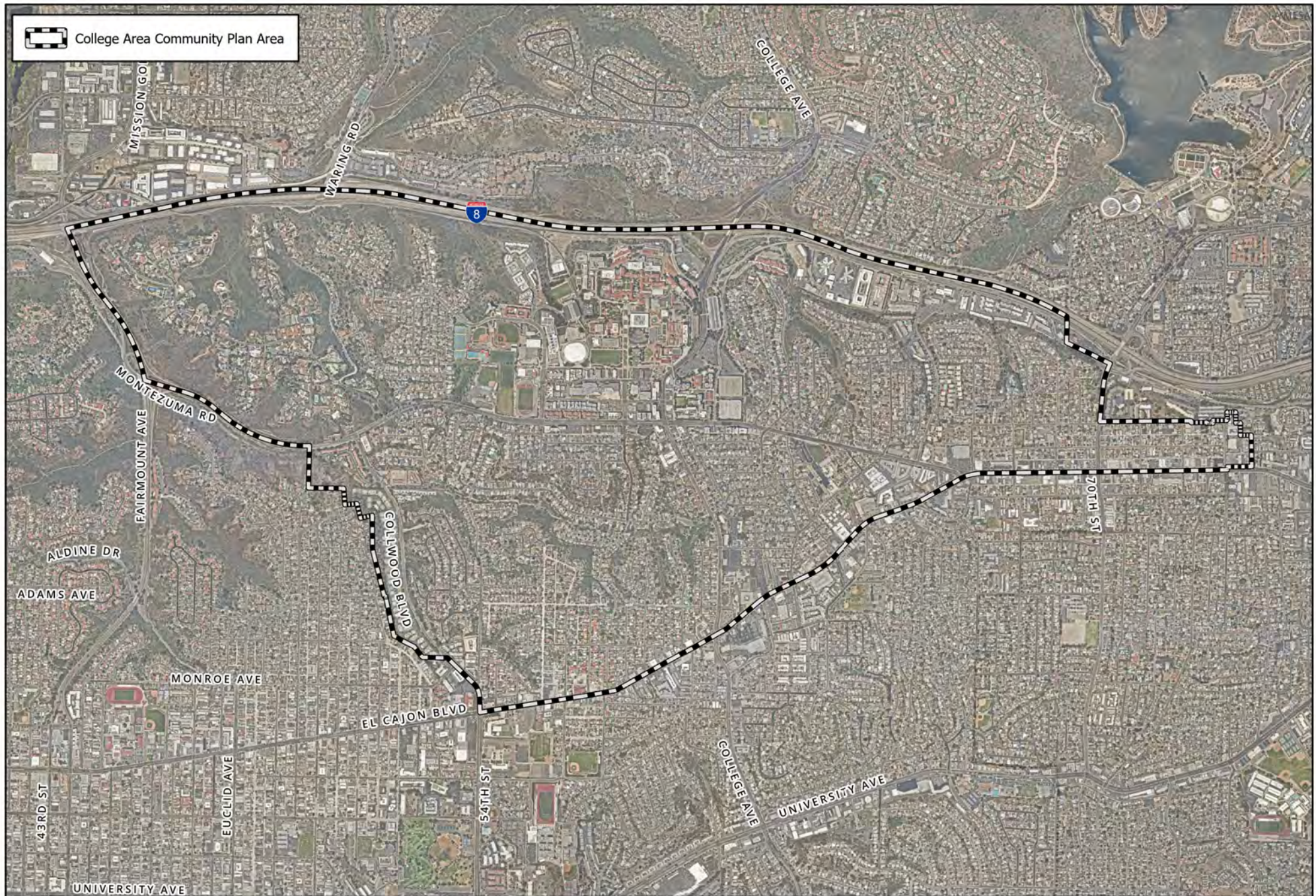


Figure 3
Aerial Photograph

Figure 4: Proposed Land Use

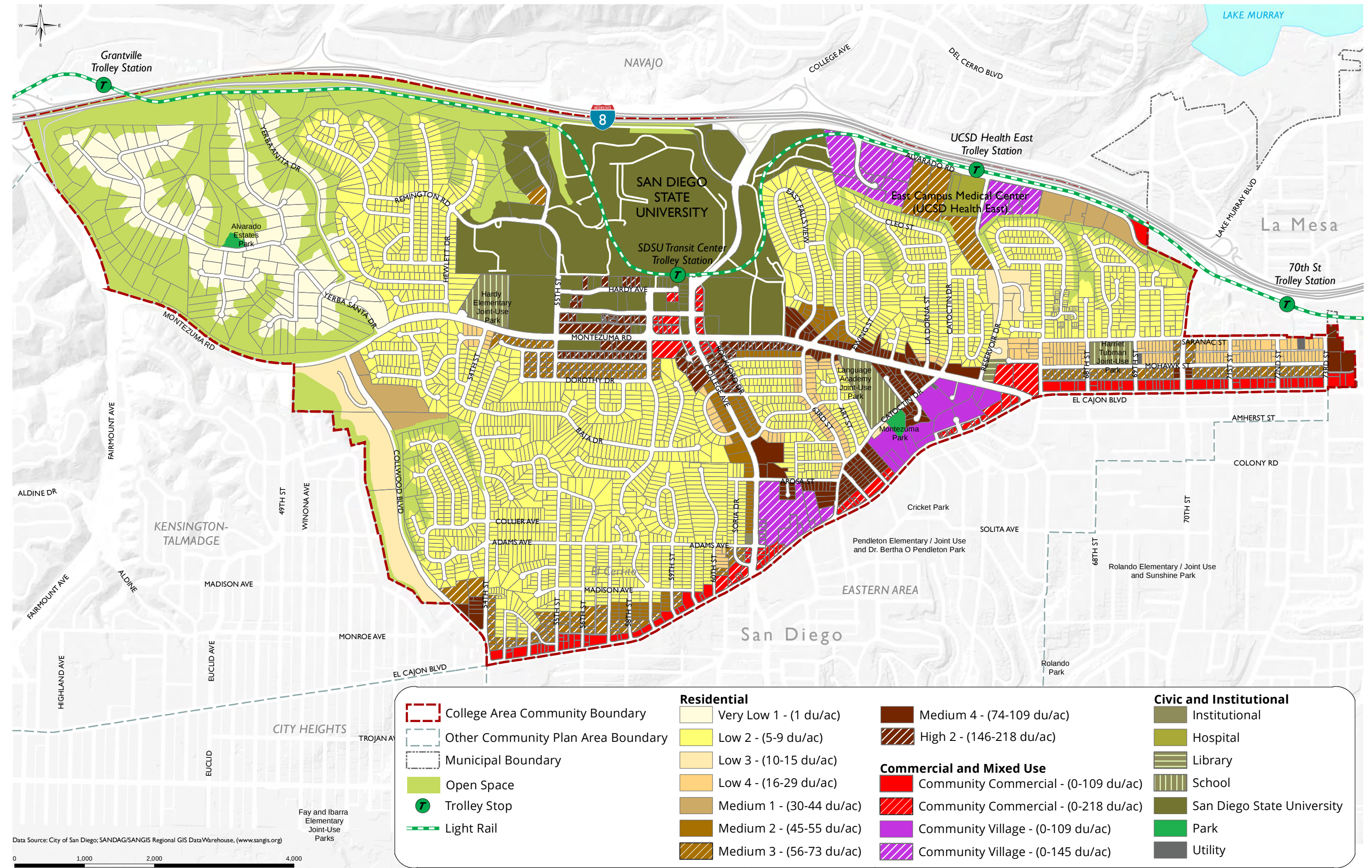


Figure 5: Planned Pedestrian Network

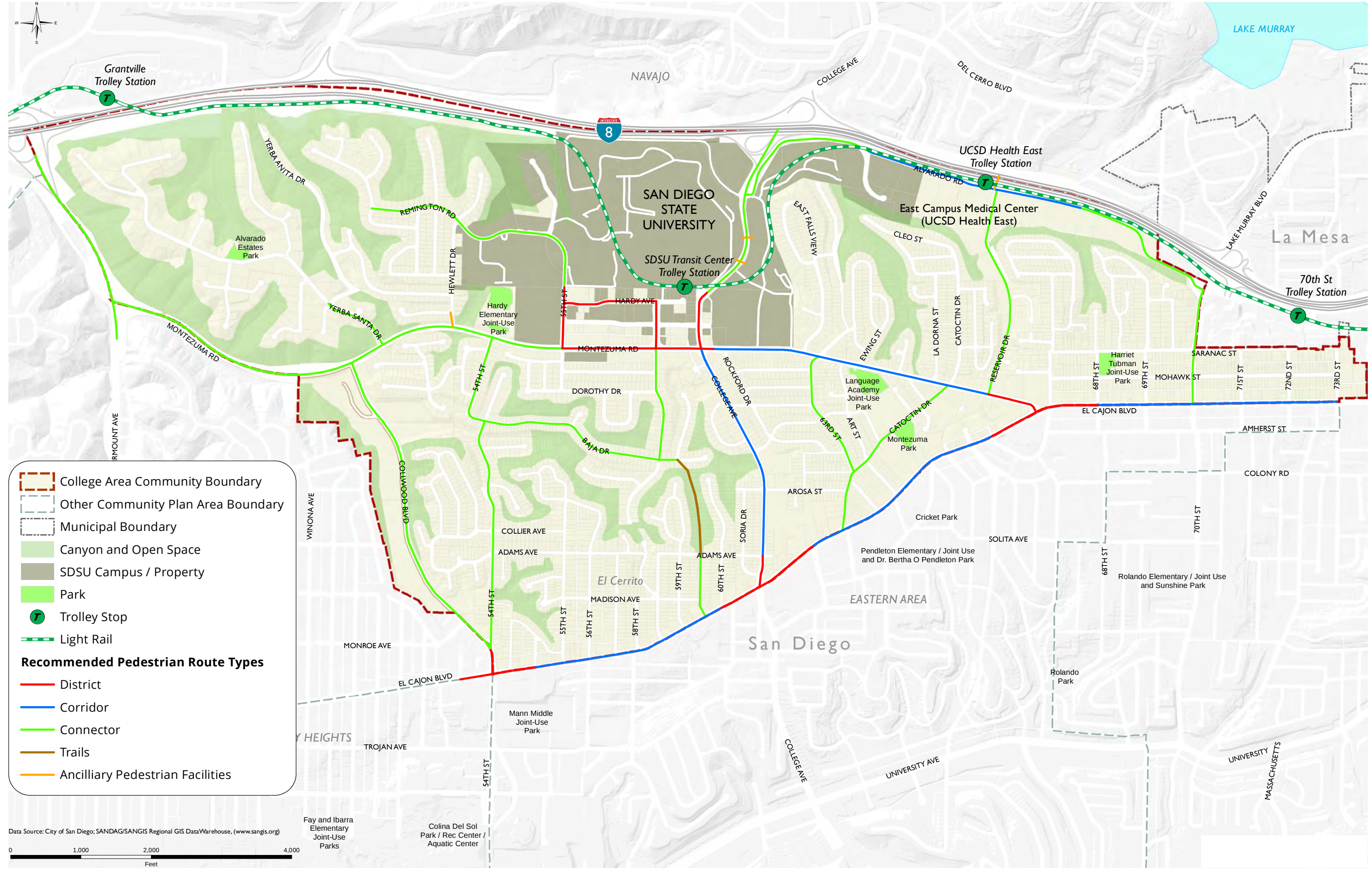


Figure 6: Planned Bicycle Network

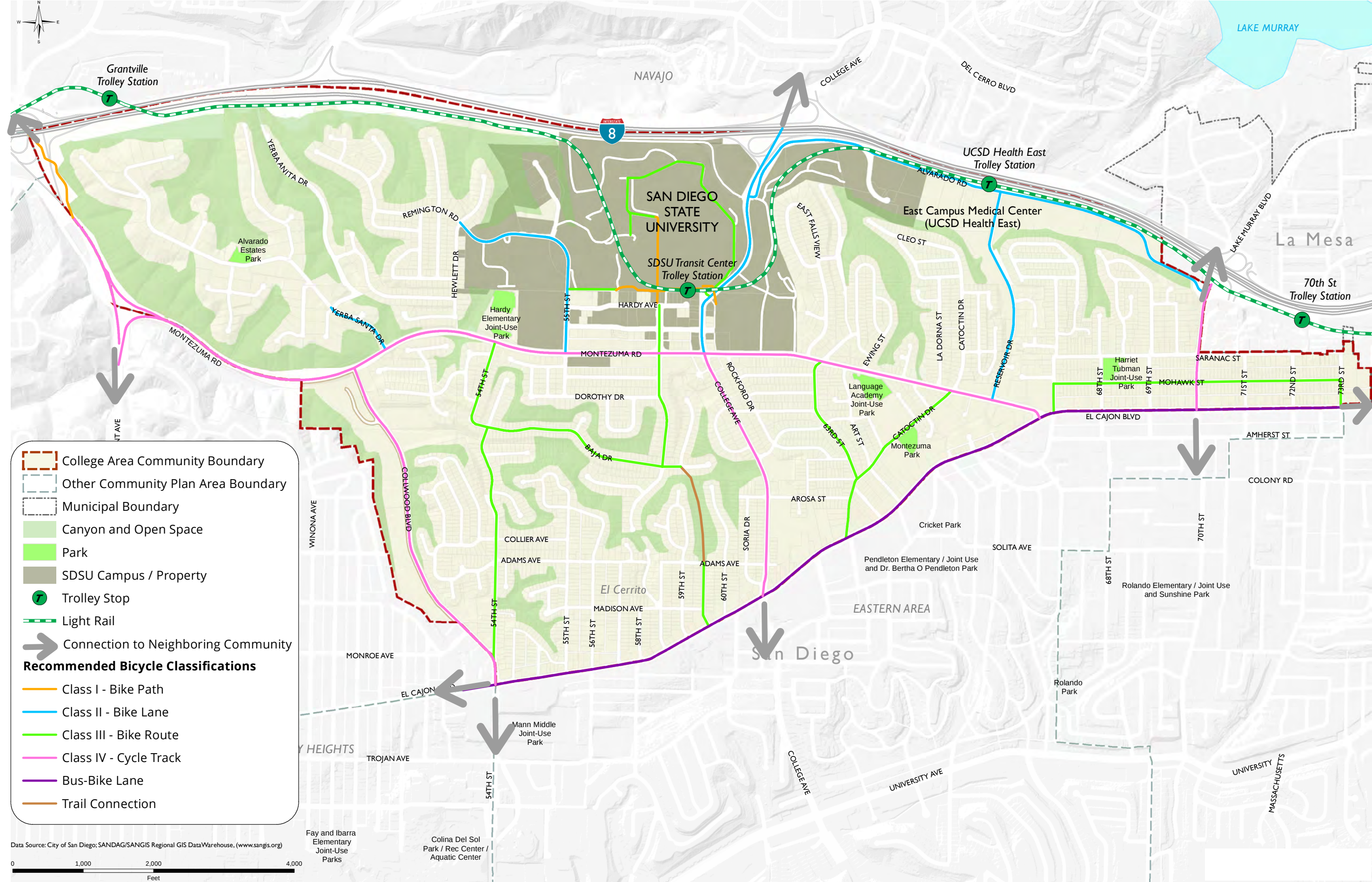


Figure 7: Planned Street Classifications

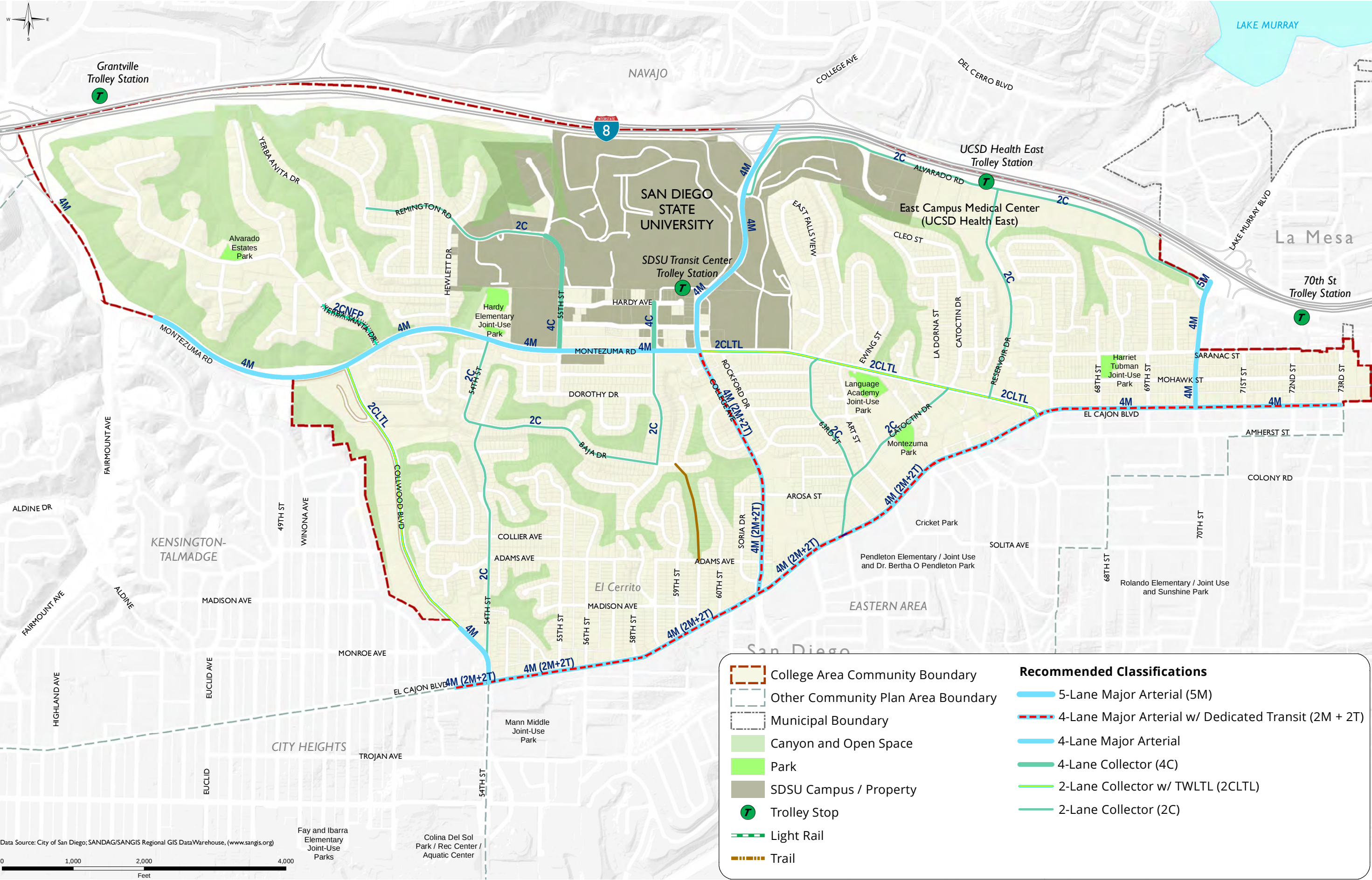


Figure 8: Planned Transit Network

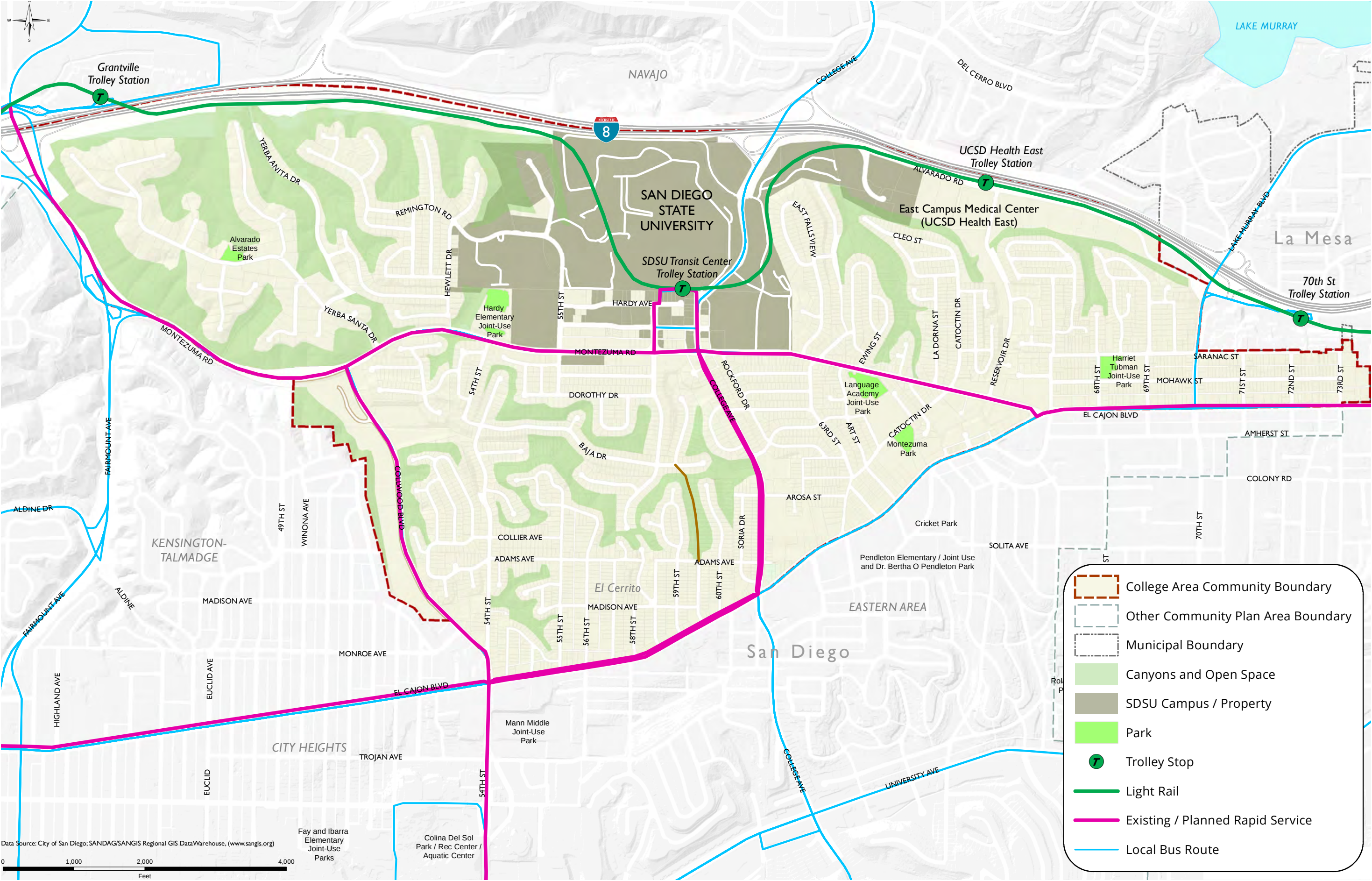
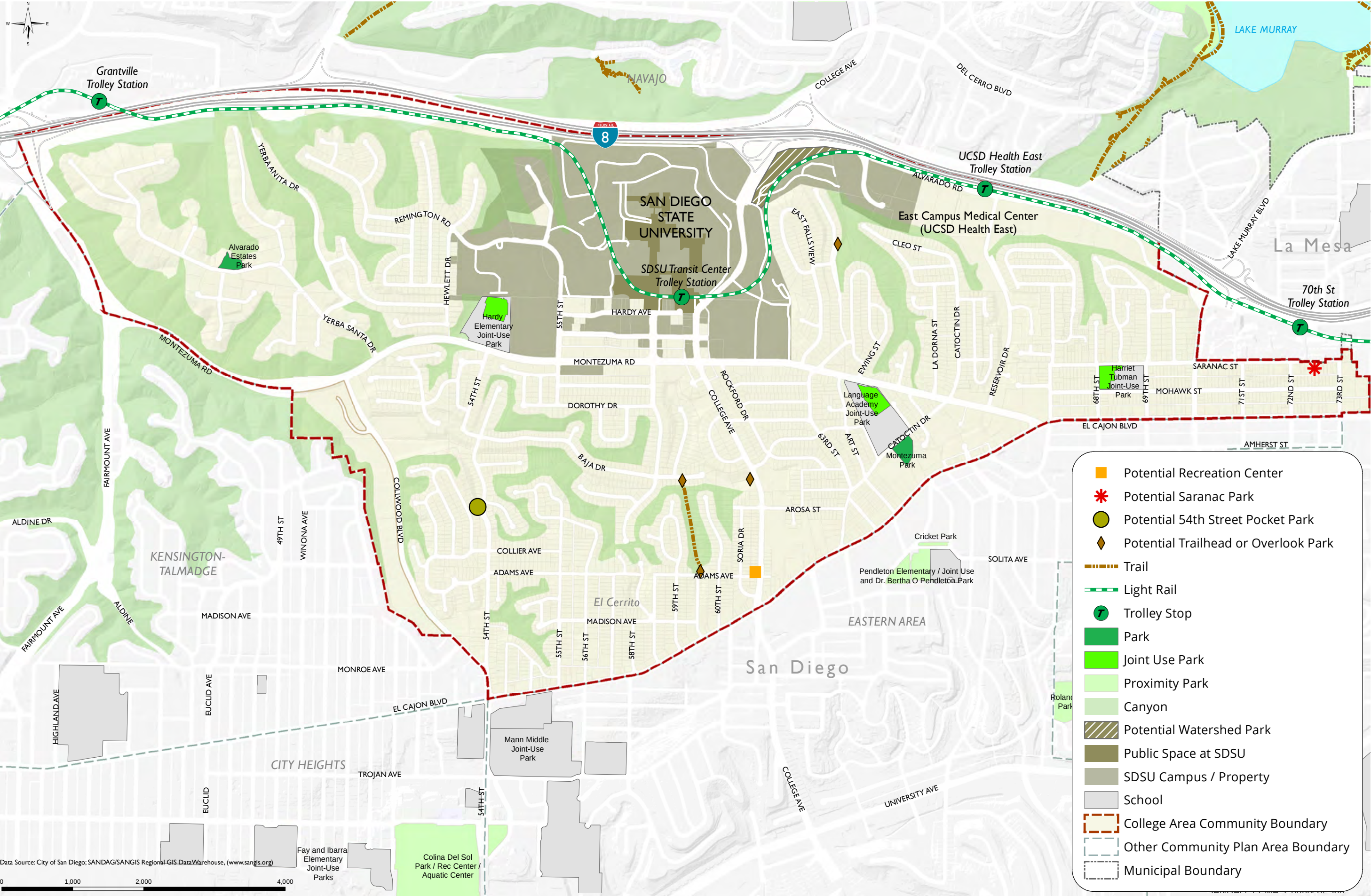


Figure 9: Parks



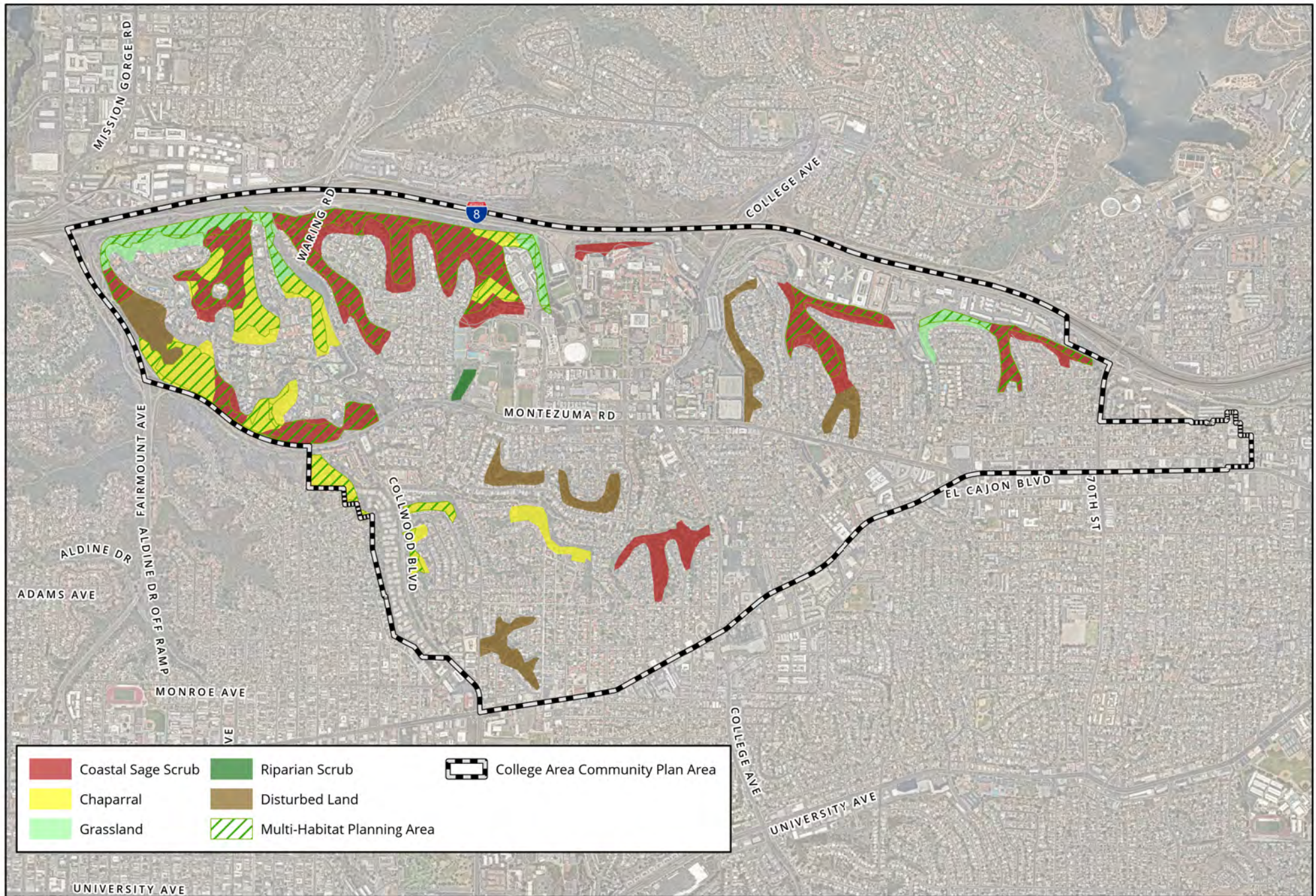


Figure 10
Vegetation Communities and Land Cover Types

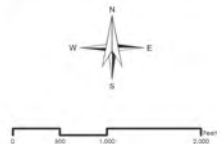


Figure 11: Open Spaces and Multi-Habitat Planning Area

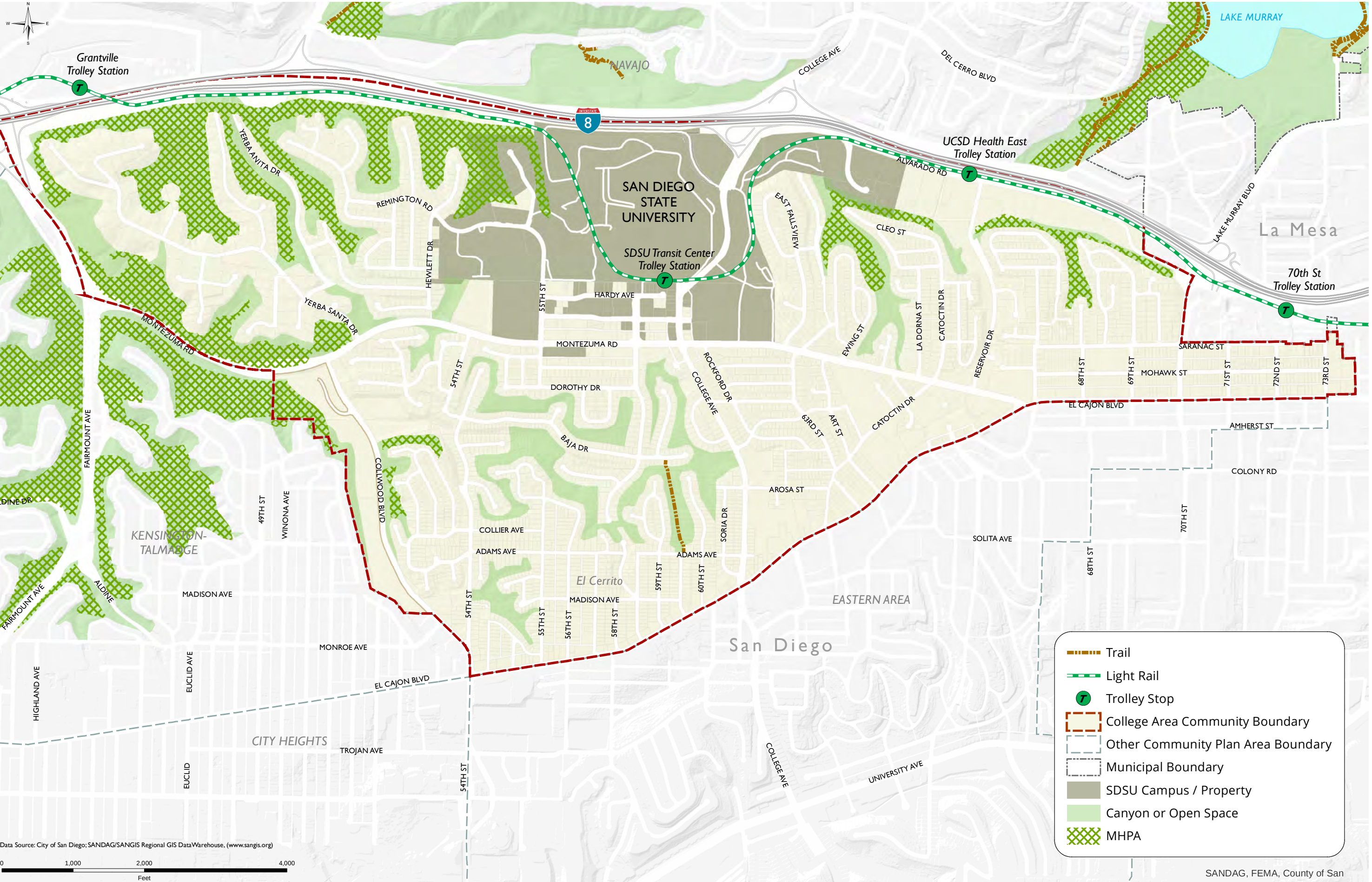
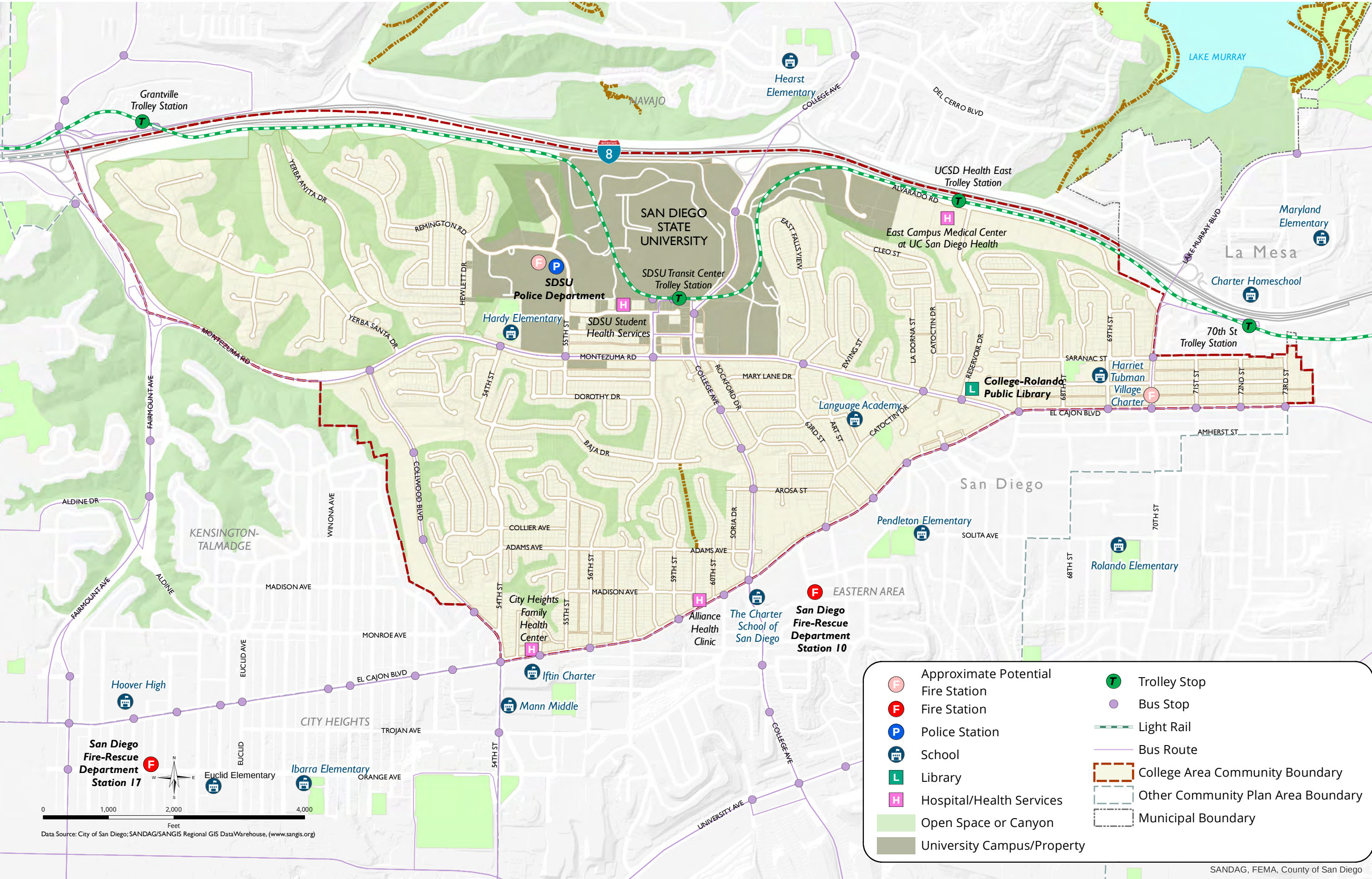


Figure 12: Public Facilities



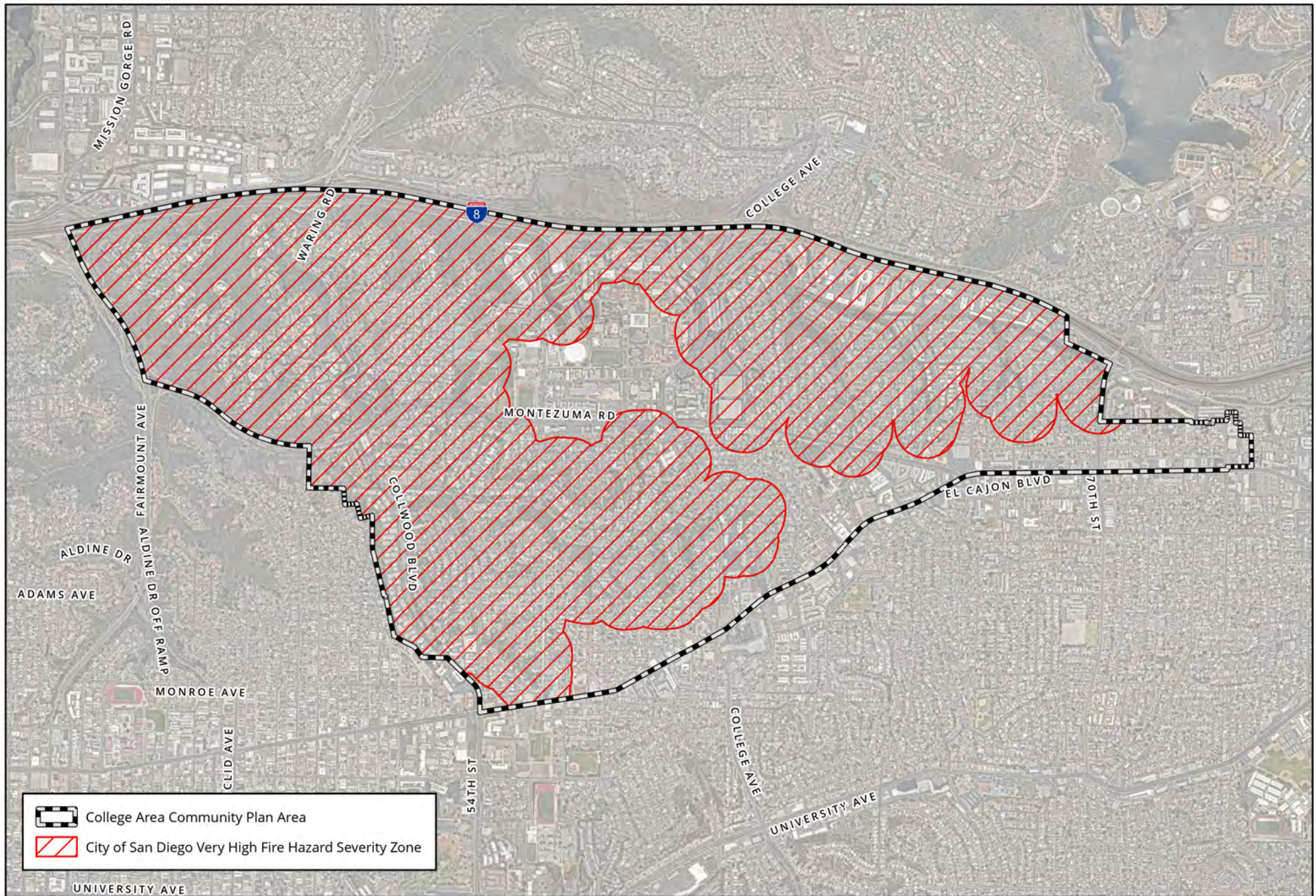
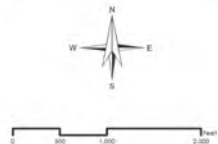
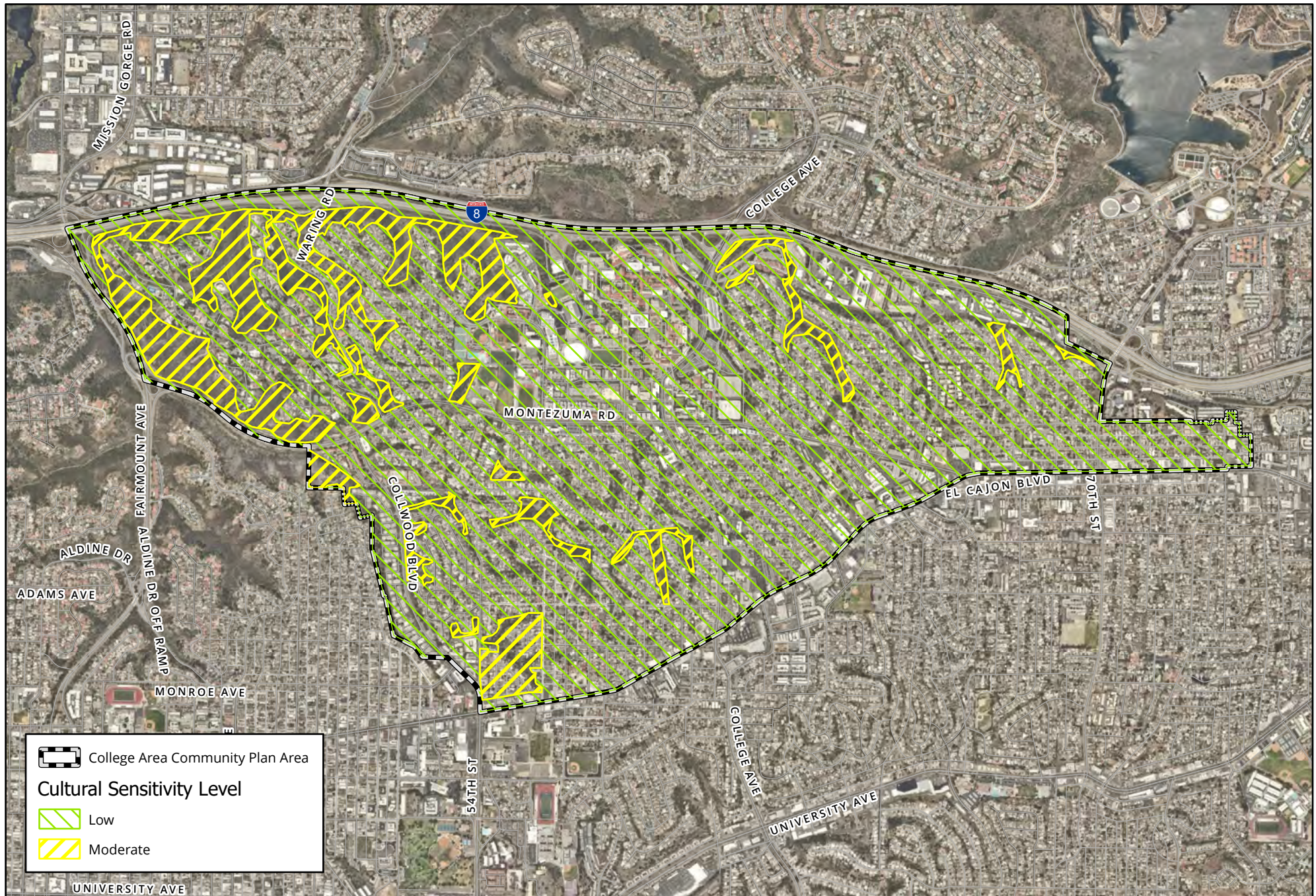


Figure 13
Very High Fire Hazard Severity Zones





0 500 1,000 2,000 Feet

Figure 14
Cultural Sensitivity

Figure 15: Community Enhancement Overlay Zone Area & Greenways

