THE CITY OF SAN DIEGO

ADDENDUM TO A PROGRAM ENVIRONMENTAL IMPACT REPORT

Project No. 1107880
Addendum to PEIR No. 386029
SCH No. 2014051075

SUBJECT: **EMERALD HILLS:** VESTING TENTATIVE MAP, SITE DEVELOPMENT PERMIT, NEIGHBORHOOD USE PERMIT, and NEIGHBORHOOD DEVELOPMENT PERMIT to allow for the development of 123 single-family residential lots, seven private Home Owners' Association open space lots, as well as public roads, a retaining wall in the northeastern corner of the site along the project's frontage with 60th Street that extends north off-site, a retaining wall along 60th Street from Dipper Street to north of Upland Street, a retaining wall at the southeastern corner of the project site within the 60th Street Right of Way (ROW) and private utility improvements. The 31.2-acre project site is located at 5702 Old Memory Lane. The site is designated Residential Very Low (0 to 4 dwelling units per acre) per the Encanto Neighborhoods Community Plan, and zoned RS-1-2. Additionally, the site is located within the Airport Land Use Compatibility Overlay Zone (San Diego International Airport), Airport Land Use Compatibility Plan Airport Influence Area (San Diego International Airport, Review Area 2), and the Affordable Housing Parking Demand. Applicant: D.R. Horton Los Angeles Holding Company, Inc.

I. SUMMARY OF PROPOSED PROJECT

The project requests a Vesting Tentative Map (VTM) (Tentative Map No. 3262907), Site Development Permit (SDP) for environmentally sensitive lands (Site Development Permit No. 3262906), Neighborhood Development Permit (NDP), and Neighborhood Use Permit (NUP) for the demolition of an existing radio transmitter facility including a 7,050 square foot transmitter building and two broadcast towers and the construction of a 123 single-family units residential development on a 31.2-acre site located within the Encanto Neighborhoods Community Plan in the City of San Diego. The project entails grading of 30.2 acres, with 176,400 cubic yards of cut and 176,400 cubic yards of fill. Overall, grading cut and fill would be balanced on site, and there would be no import or export of soils.

Figure 1, *Vesting Tentative Map No. 3262907*, depicts the proposed VTM. VTM 3262907 would establish 123 lots for single-family residential units on 16.8 acres, seven lots for Homeowners' Association (HOA) private open space land uses on 8.0 acres, and one lot for internal public streets on 6.4 acres. The project would include 13 affordable dwelling units on-site for moderate income households. The project also includes a small segment of a retaining wall in the northeastern corner of the site along the project's frontage with 60th Street, which extends off-site north of the project site, a retaining wall along 60th Street from

Dipper Street to north of Upland Street, and a retaining wall at the southeastern corner of the project site within the 60th Street ROW.

The project is requesting a development incentive as allowed by San Diego Municipal Code (SDMC) Sections 142.1309 and 143.0920 as follows:

- An incentive from SDMC Section 142.0310 (c)(1)(A) to allow fences six feet in height to be located on the street side property line for Lots 9, 53, 78, 81, 95, 102, 103, and 111. Within the referenced lots, fences shall not exceed three feet in height within the Visibility Areas in accordance with SDMC Section 142.0310(b).

Additionally, the project is requesting waivers allowed by SDMC Sections 126.0404 and 126.0505 as follows:

- A waiver from SDMC Table 131-04D to allow for a minimum street frontage of 37 feet to 49 feet for Lots 1 through 8, 10, 11, 14 through 42, 45 through 52, 54, 57, 58, 60, 61, 72 through 79, 82, 83, 85, 87 through 97, 104, 105, and 113 through 122;

- A waiver from SDMC Table 131-04D to allow for a minimum lot width of 45 feet to 49 feet for Lots 4 through 7, 10 through 15, 33 through 37, 45, 51, 52, 54, 57, 58, 60, 61, 82, 83, 85, 92 through 97, 112 through 116, 121 and 122;

- A waiver from SDMC Table 131-04D to allow for a minimum lot width (corner) of 48 feet to 54 feet for Lots 9, 53, 78, 81, 95, and 111;

- A waiver from SDMC Table 131-04D to allow for a minimum lot depth of 93 feet on Lots 110 and 111;

- A waiver from SDMC Section 142.0560(j)(3), which references Standard Drawing SDG-164, to allow for Lots: 1 through 61, 71 through 83, 85 through 97, 99 through 101, 104 through 108 and 112 through 123, 16-foot-wide driveways with a 3-foot flare on each side for a total driveway width of 22 feet. 107 of the 123 residential lots in this subdivision would exceed the 40-percent maximum driveway curb opening width.

Access to the project site is proposed via 60th Street, which would connect to Street "A" at the eastern edge of the site. Additionally, the project proposes emergency vehicle access only with a pedestrian facility via Old Memory Lane, which would connect to Street "B" at the western edge of the site. The project proposes four, two-lane residential local public streets (Streets "A" through "D") to facilitate access and circulation within the site. The project also includes associated utility improvements, including off-site improvements consisting of frontage improvements to 60th Street.

II. ENVIRONMENTAL SETTING

The project site is substantially the same as described in the Encanto Neighborhoods Community Plan (ENCP) Final Program Environmental Impact Report (PEIR). Figure 2, *Aerial Photograph*, depicts the existing conditions of the 31.2-acre project site. The project site

includes an existing radio transmitter facility, comprising a 7,050-square-foot transmitter building and two broadcast towers. Based on historical aerial photographs, the broadcast towers and a transmitter building were constructed between 1948 and 1949. The undeveloped site area has been subject to regular disking, which is consistent with the conditions that existed at the time the ENCP was adopted in 2015. (BFSA, 2024a)

As shown in Figure 3, *Vicinity Map*, the project site is located in the eastern portion of the City of San Diego, within the Encanto Neighborhoods community. Land uses to the north of the project site include single-family residential, open space, and State Route 94 (SR-94). Land uses to the east of the project site consist of single-family residential uses. To the south of the project site are single-family residential and open space land uses. To the west of the project site are single-family residential, recreation, and open space land uses.

III. SUMMARY OF ORIGINAL PROJECT (2015)

The project site is located at 5702 Old Memory Lane (Figures 1 to 3) within the boundaries of the Southeastern San Diego (SESD) and Encanto Neighborhoods Community Plan (ENCP) Updates (CPU) Project Program Environmental Impact Report (PEIR) No. 386029/SCH No. 2014051075, which was certified by the City Council on December 2, 2015, via Resolution No. 310077. Additionally, a Mitigation Monitoring and Reporting Program (MMRP), Findings, and Statements of Overriding Considerations were adopted via this resolution. The SESD and ENCP Update project involved an update to the SESD Community Plan, adoption of a new community plan for the Encanto Neighborhoods, a General Plan Amendment, Rescission of the Southeastern San Diego Planned District Ordinance (SESDPDO) and the Mt. Hope Planned District Ordinance (MHPDO), amendments to the City's Land Development Code (LDC), adoption of a Rezone Ordinance to replace the SESD and Mt. Hope PDOs with citywide zoning, adoption of a Community Plan Implementation Overlay Zone (CPIOZ), and approval of an Impact Fee Study (IFS). The SESD CPU and ENCP Update provide a long-range, comprehensive policy framework for growth and development in the SESD and Encanto Neighborhoods communities through 2035. The SESD CPU and ENCP provide detailed neighborhood-specific land uses and development regulations (zoning) that are consistent with city-wide zoning classifications; development design guidelines; and numerous other mobility and public realm guidelines, incentives, and programs to revitalize the urban core in accordance with the general goals stated in the General Plan. The SESD CPU and ENCP additionally serve as the basis for guiding a variety of other actions, such as parkland acquisitions and transportation improvements. Guided by city-wide policy direction contained within the General Plan (adopted by the City Council on March 8, 2008), the SESD CPU and ENCP identify land use strategies with new land use designations to create villages along major transportation corridors, as well as other enhancements to the existing planning area.

The SESD and ENCP Update PEIR concluded that the CPUs would result in significant environmental impacts to Air Quality, Transportation/Circulation and Noise that would be significant and unmitigated. The following issue areas were determined to be significant but mitigated to below a level of significance: Land Use, Biological Resources, Hydrology/Water Quality, Historical Resources, Paleontological Resources, and Geology. All other impacts analyzed in the PEIR were determined to be less than significant.

IV. ENVIRONMENTAL DETERMINATION

The City of San Diego previously prepared a PEIR for the Southeastern San Diego and Encanto Neighborhoods Community Plan Updates (CPUs) Project (Project No. 386029/SCH No. 2014051075). Based on all available information and in light of the entire record, the analysis in this Addendum, and pursuant to Sections 15162, 15164, 15168, and 15183(c) of the State California Environmental Quality Act (CEQA) Guidelines, 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 current project, none of the situations described in Sections 15162 and 15164 of the State CEQA Guidelines apply. No changes in circumstances have occurred, and no new information of substantial importance has manifested, which would result in new significant or substantially increased adverse impacts as a result of the project. Therefore, this Addendum has been prepared in accordance with Section 15164 of the CEQA

State Guidelines. Further, use of the Addendum for the project complies with CEQA Guidelines Section 15168(c). Appropriate mitigation measures have been incorporated, as applicable. Public review of this Addendum is not required per CEQA.

V. IMPACT ANALYSIS

The following includes the project-specific environmental review pursuant to CEQA. The analysis in this document evaluates the adequacy of the certified 2015 Southeastern San Diego and Encanto Neighborhoods CPUs PEIR (2015 CUPs PEIR) relative to the project. An overview of the Emerald Hills project impacts in relation to the previously certified Program EIR is provided in Table 1, *Impact Assessment Summary*.

Table 1 Impact Assessment Summary

Environmental Issue	2015 PEIR Impacts	2015 PEIR Mitigation Framework	Proposed Project Impacts	Project Mitigation
Land Use	Less than significant with mitigation	Mitigation Framework MM-LU-1a, MM-LU-1b, and MM-LU-2	Less than significant	-
Transportation	Significant and unavoidable	-	Less than significant*	-
Air Quality	Significant and unavoidable	Mitigation Framework MM-AQ-1 to -4	Less than significant	-
Noise	Significant and unavoidable	Mitigation Framework MM-NOS-1 to -4	Less than significant	-
Biological Resources	Less than significant with mitigation	Mitigation Framework MM-BIO-1 to -3, and MM-LU-2	Less than significant with mitigation	MM-BIO-1, and MM-BIO-2
Hydrology and Water Quality	Less than significant with mitigation	Mitigation Framework MM-HYD/WQ-1, and -2	Less than significant	-
Historical Resources	Less than significant with mitigation	Mitigation Framework MM-HIST-1 and -2	Less than significant	-
Paleontological Resources	Less than significant with mitigation	Mitigation Framework MM-PALEO-1	Less than significant with mitigation	MM-PALEO-1
Geology and Seismic Hazards	Less than significant with mitigation	Mitigation Framework MM-GEO-1 and-2	Less than significant	-
Hazardous Materials	Less than significant	-	Less than significant	-
Greenhouse Gas Emissions	Less than significant	-	Less than significant	-
Energy	Less than significant	-	Less than significant	-
Public Services and Facilities	Less than significant	-	Less than significant	-
Public Utilities	Less than significant	-	Less than significant	-
Visual Effects and Neighborhood Character	Less than significant	-	Less than significant	-

* Complete Communities: Housing Solutions and Mobility Choices PEIR (City of San Diego 2020) is the basis for the transportation threshold and mitigation, and is incorporated by reference.

LAND USE

2015 CPUs PEIR

The 2015 CPUs PEIR found that the ENCP's goals, policies, and programs were consistent with the land use plans, policies, and regulations of the City's General Plan; the Land Development Code; the San Diego International Airport Land Use Compatibility Plan (ALUCP); and the San Diego Association of Governments' (SANDAG) Regional Comprehensive Plan. Accordingly, the PEIR concluded that the ENCP would have no impact due to conflicts with other planning documents, and no mitigation would be required. (City of San Diego, 2015a, pp. 5.1-34 through 5.1-43)

The 2015 CPUs PEIR found that implementation of the ENCP would not conflict with the intent and purpose of the Brush Management regulation of the LDC. The PEIR found that the development footprint of the ENCP would encroach into Environmentally Sensitive Lands (ESL) areas, which include steep hillsides, sensitive biological resources, lands within the City's MHPA, and flood hazard areas; however, the PEIR noted that development in the ENCP would be required to comply with ESL Regulations. The PEIR concluded that, with implementation of Mitigation Frameworks MM-LU-2 and MM-BIO-1 through BIO-3, which identifies site-specific mitigation for impacts to sensitive biological resources, the ENCP would not conflict with the purpose and intent of the ESL regulations. The PEIR found that the ENCP area contains known historical resources and noted the potential for the discovery of previously unknown archaeological resources in the ENCP area. However, the PEIR found that the Land Use, Urban Design and Historic Preservation Elements of the ENCP contain policies intended to promote the identification and preservation of historic resources on a project level. The PEIR identified MM-LU-1a, which states that projects that are consistent with the CPU and base zone can be processed ministerially. Additionally, the PEIR concluded that, with the implementation of Mitigation Framework MM-LU 1-b, impacts would be less than significant. Mitigation Framework MM-LU-1b states that future development projects that do not comply with the CPIOZ Type A supplemental regulations and cannot demonstrate that there are no historical resources (Built Environment) on-site shall be subject to discretionary review in accordance with Mitigation Framework MM-HIST-1 identified in PEIR Section 5.7: Historical Resources. The PEIR concluded that potential impacts due to conflict with the purpose and intent of the ESL Regulations, the Historical Resources Regulations, and the Brush Management Regulations of the LDC would be below a level of significance. (City of San Diego, 2015a, 5.1-42 through 5.1-50)

The PEIR included an analysis of potential impacts due to a conflict with the City's Multiple Species Conservation Program (MSCP) Subarea Plan and the MHPA. As stated in the PEIR, the MHPA is mapped within the Encanto Neighborhoods Community Plan. The PEIR found that future developments would be required to implement the ESL Regulations, the City's Biology Guidelines, and the MSCP Subarea Plan. Additionally, the PEIR noted that all MHPA areas in the ENCP are designated as open space and are not expected to be directly impacted by development. The PEIR found that, although implementation of the ENCP would introduce land uses adjacent to MHPA, which would potentially result in significant impacts, compliance with established development standards and regulations, along with the implementation of Mitigation Framework MM-LU-2 would serve to reduce impacts on MHPA lands to below levels of significance. (City of San Diego, 2015a, pp. 5.1-51 through 5.1-55)

Emerald Hills Project

The project is located within the boundary of the ENCP. The project site is designated Residential by the General Plan and Residential – Very Low (0-4 dwelling units/acre) by the ENCP. The project proposes 123 dwelling units on approximately 31.18 acres, or 3.94 dwelling units per acre. Thus, the proposed project falls within the Residential – Very Low (0-4 dwelling units/acre) designation and is consistent with the ENCP land use designation for the project site. As the project aligns with the ENCP, it is also consistent with the regional planning documents.

Implementation of the project would require the demolition of two broadcast towers and a 7,050-square-foot transmitter building. A Historical Resources Technical Report (HRTR, *Appendix B*), authored by Brian F. Smith and Associates (BFSA) and dated January 31, 2024, was prepared for the project site (BFSA, 2024a). As noted in the HRTR, the existing structures on the project site were not found to be significant under Historic Resources Board (HRB) criteria. Thus, the project would not result in a conflict with the Historical Resources Regulations and impacts would be less than significant. The project has been determined to be discretionary, as the project site contains ESL, the project would encroach into the public right-of-way, would include a private structure in the public right-of-way, and proposes a neighborhood identification sign. As the project is discretionary and would not qualify to be ministerial, Mitigation Framework MM-LU-1b of the Community Plan MMRP is not applicable to the proposed project.

A Biological Technical Report (BTR, *Appendix A*), authored by Helix Environmental Planning and dated February 2025, was prepared for the project. The BTR found that the project would result in direct impacts to 0.3 acres of Diegan coastal sage scrub (disturbed), a Tier II habitat outside of the MHPA. Additionally, the project would result in 28.9 acres of direct impacts to non-native grassland, a Tier IIIB habitat outside of the MHPA. The project would provide mitigation in accordance with the Biology Guidelines (City 2018). Specifically, impacts to Tier II habitat would be mitigated at a 1:1 ratio within the MHPA and impacts to Tier IIIB habitat would be mitigated at 0.5:1 ratio within the MHPA. Therefore, with the implementation of the site-specific Mitigation Measure MM-BIO-1, impacts to ESL would be mitigated to a less-than-significant level similar to that described in the 2015 CPUs PEIR and consistent with the MSCP and Biology Guidelines (City of San Diego 2018). Per Mitigation Framework MM-LU-1b, the project has been reviewed in accordance with Mitigation Frameworks LU-2 and BIO-1-3 of the Community Plan MMRP (see below). Overall, the project would comply with the ESL Regulations.

Implementation of the project would result in development that is consistent with the ENCP. The project site is located within the boundaries of the City of San Diego's MSCP Subarea Plan but is located outside of the boundaries of the MHPA. The nearest MHPA is located approximately 278 feet to the south of the site, beyond the two rows of houses on either side of Old Memory Lane. Therefore, due to the project's distance from the nearest MHPA, the project would not be required to implement land use adjacency guidelines as described in Section 1.4.3 of the MSCP and Mitigation Framework MM-LU-2 is not applicable to the project.

The project site is located approximately 6.1 miles east of the San Diego Airport in the ALUCP Airport Influence Area (AIA) (Review Area 2). The project site is not located within any ALUCP Safety Zones or

ALUCP noise contours. The project would be consistent with all applicable land use plan, policies and regulations; therefore, no impact would occur.

Overall, based on the foregoing analysis and information, the project is within the scope of the analysis of the PEIR and there is no evidence that the project would require a major revision to the PEIR. The project would not result in any new significant impact, nor would there be a substantial increase in the severity of impacts from that described in the PEIR.

TRANSPORTATION

2015 CPUs PEIR

The 2015 CPUs PEIR found that the ENCP contains a comprehensive plan to improve the pedestrian, transit, and bicycle transportation network and would result in impacts to roadway segments, intersections, and freeway segments. The 2015 CPUs PEIR noted that buildout of the ENCP would generate 86,039 more daily trips compared to the existing conditions. The 2015 CPUs PEIR noted that implementation of the ENCP would result in impacts to 25 roadway segments within the ENCP area. Additionally, the ENCP was found to result in three intersections operating at LOS E or F within the ENCP area. The 2015 CPUs PEIR noted that, at the program level, impacts shall be reduced through the classifications of roadways and identification of necessary roadway, intersection and freeway improvements; mitigation or construction of these improvements would be carried out at the project level. The 2015 CPUs PEIR noted that some identified improvement measures are not recommended due to their inconsistency with the ENCP Mobility Element; therefore, impacts on the circulation was found to be significant and unmitigated (City of San Diego, 2015a, pp. 5-2.68 through 5.2-126). The PEIR identified that future development projects under the CPUs would be required to incorporate mitigation measures to reduce specific project's impact. Since the degree of future impacts and applicability, feasibility, and success of future mitigation measures was not known for each specific future project at this program-level PEIR analysis, the program-level traffic impacts were identified to remain significant and unavoidable.

The 2015 CPUs PEIR found that roadway improvements associated with the buildout of the ENCP would be constructed in accordance with City design standards and applicable ENCP policies. Therefore, the San Diego and Encanto Neighborhoods 2015 CPUs PEIR concluded that impacts associated with traffic hazards for motor vehicles, bicyclists, and pedestrians would be less than significant. (City of San Diego, 2015a, pp. 5.2-140 through 5.2-141)

The 2015 CPUs PEIR found that buildout of the ENCP would result in improved access for transit users, bicycles, and pedestrians. Therefore, the 2015 CPUs PEIR concluded that impacts associated with circulation and access would be less than significant with no mitigation required. (City of San Diego, 2015a, p. 5.2-139)

The 2015 CPUs PEIR found that ENCP policies would be consistent with the City's General Plan policies supporting alternative transportation modes. Therefore, the 2015 CPUs PEIR concluded that impacts would be less than significant, and no mitigation was required. (City of San Diego, 2015a, pp. 5.2-140 through 5.2-147)

Emerald Hills Project

Senate Bill 743 (SB 743) was passed in 2013, which required that by July 1, 2020, a project's transportation impacts be evaluated based on a Vehicle Miles Traveled (VMT) measure, instead of evaluating impacts based on Level of Service (LOS) criteria. The Natural Resources Agency finalized updates to the CEQA Guidelines in January 2019 that were approved by the Office of Administrative Law and are currently in effect. CEQA Guidelines Section 15064.3(b) now includes specific considerations for evaluating a project's transportation impacts using a VMT measure, instead of evaluating impacts based on LOS criteria, as required by SB 743. While the analysis below utilizes VMT as the basis for determining transportation impacts, it should be noted that an analysis utilizing LOS criteria would be acceptable under CEQA Guidelines Section 15064.3(c) and 15007(c).

The Complete Communities Mobility Choices (Mobility Choices Program) is comprised of the amendments to the SDMC (SDMC Chapter 14, Article 3, Division 11) and Land Development Manual to create the Mobility Choices Regulations and adoption of a new CEQA significance threshold for transportation that implements SB 743. The Mobility Choices Regulations ensure that new development mitigates transportation VMT impacts to the extent feasible, either through VMT Reduction Measures if the project is located in Mobility Zone 2 or payment of the Active Transportation in Lieu Fee (Mobility Choices Fee) if the project is located in Mobility Zone 3 or 4. This analysis incorporates by reference the Complete Communities: Housing Solutions and Mobility Choices Program Final Program Environmental Impact Report (City of San Diego 2020) (State Clearinghouse Number 2019060003). The Complete Communities Final Program Environmental Impact Report is available on the City's Complete Communities website (https://www.sandiego.gov/complete-communities) or by request from the City Planning Department.

A project-specific Vehicle Miles Traveled (VMT) Analysis was prepared by Urban Crossroads and is included as *Appendix C2* (Urban Crossroads, 2024d). The VMT Analysis for the project was prepared in accordance with the City's current Transportation Study Manual (TSM). (City of San Diego, 2022)

VMT Analysis

The TSM contains screening criteria used to identify when a proposed project can be presumed to have a less-than-significant VMT impact based on project characteristics and/or location. A project needs to meet one of the screening criteria to be presumed to have a less-than-significant impact and not required to perform further analysis. The project does not meet any of the screening criteria contained in the TSM, and a VMT analysis was required (Appendix C2).

Based on the SANDAG Series 14 ABM2+ (Base Year 2016) model screening maps, the project is located in Census Tract 30.01 and would be expected to have a VMT per capita of 16.9, or 89.2% of the regional average. The project would be required to reduce this impact to a level below significance, which is 85% of the regional mean. As the project's expected VMT per capita is 89.2%, a minimum reduction of 4.3% is required.

The project is subject to the Complete Communities: Mobility Choices Regulations. The project site is located within Mobility Zone 2 and is required to provide a minimum of 5 points of VMT Reduction Measures per San Diego Municipal Code Section 143.1103(b)(1). Accordingly, the project condition of

approval requires VMT Reduction Measures totaling 5.1 points prior to issuance of first occupancy permits, as follows:

a. Install one bike repair station in Pocket Park 1
b. Provide eight trees with 20 feet spacing along Street "A"
c. Construct a 200-square-foot resting area in Pocket Park 1 with benches, signage, and trash receptacle.

With the implementation of the above VMT Reduction Measures per the Mobility Choices Regulations, the project would achieve a reduction of a minimum of 5 points per the Mobility Evaluation Tool calculator and the transportation VMT impact would be less than significant per the City's Significance Determination Thresholds (City of San Diego 2022).

Additionally, a project-specific Local Mobility Analysis (LMA) was prepared by Urban Crossroads and is included as *Appendix C1*. (Urban Crossroads, 2024b)

The project site is designated for residential land uses and there are no existing or planned transportation systems located within the site or adjacent to the site; therefore, the project would not interfere with current or future transit uses. Additionally, the land use and design of the project would not conflict with current or planned transit lines in the project vicinity. Roadway improvements and circulation proposed as part of the project would be constructed per current City standards and ENCP policies. Development of the project would result in alterations to the existing circulation system through intersection and roadway improvements. As proposed, the project includes four public residential local streets (Streets "A" through "D") with a 32-foot curb-to-curb width within a 52-foot-wide right-of-way to facilitate vehicular circulation within the site. Access to the project site is proposed via 60th Street, which would connect to Street "A" at the eastern edge of the site. Additionally, the project proposes an emergency vehicle access only with a pedestrian facility via Old Memory Lane, which would connect to Street "B" at the western edge of the site. No existing public access points would be permanently closed as part of project implementation. Accordingly, and consistent with the findings of the 2015 CPUs PEIR, the project would have a less-than-significant impact associated with altering circulation and emergency access on the project site.

The project would implement the goals and policies of the ENCP with respect to alternative modes of transportation. The project includes pedestrian and bicycle improvements, including the construction of a five-foot-wide non-contiguous sidewalk buffered by a 12-foot-wide bio-swale in addition to a 10-foot trail easement within the project site along 60th Street. The internal circulation roads, currently labeled on project plans as Streets "A", through "D" would each be constructed with a 12-foot-wide parkway on each side of the street, including a five-foot wide sidewalk buffered by seven-foot-wide landscaping.

Overall, based on the foregoing analysis and information, the project is within the scope of the analysis of the PEIR and there is no evidence that the project would require a major change to the PEIR. The project would not result in any new significant impact, nor would there be a substantial increase in the severity of impacts from that described in the PEIR.

AIR QUALITY

2015 CPUs PEIR

The 2015 CPUs PEIR found that total emissions under the ENCP Update are projected to be greater than total emissions under the adopted community plan upon which the current Regional Air Quality Strategy (RAQS) for the San Diego Air Basin (SDAB) was based. Therefore, the 2015 CPUs PEIR found that the ENCP would conflict with the implementation of the RAQS and would have a significant and unavoidable impact. A statement of overriding considerations was adopted for these impacts. (City of San Diego, 2015a, pp. 5.3-14 through 5.3-15)

The 2015 CPUs PEIR found that projects within the ENCP could contribute to cumulatively considerable emissions. The 2015 CPUs PEIR found that, in general, implementation of the policies in the ENCP and General Plan would preclude or reduce air quality impacts. Implementation of Mitigation Framework MM-AQ-1 would reduce emissions and may preclude potential impacts. Additionally, operational emissions could potentially contribute to regional violations. Mitigation Framework MM-AQ-2 requires development that would significantly impact air quality, either individually or cumulatively, be conditioned to require all reasonable mitigation to avoid, minimize, or offset the impact and that future projects be required to buffer sensitive receptors from air pollution sources through the use of landscaping, open space, and other separation techniques. Implementation of Mitigation Framework MM-AQ-2 would reduce emissions and may preclude potential impacts. However, it is possible that adherence would not adequately protect air quality. The 2015 CPUs PEIR found that construction activities would have a significant impact on local air quality and, because project-specific data was not available, impacts were found to be unavoidable on a program level. (City of San Diego, 2015a, pp. 5.3-14 through 5.3-15)

The 2015 CPUs PEIR found that there were three intersections with a potential for Carbon Monoxide (CO) "Hot Spots" within the ENCP area. However, the 2015 CPUs PEIR found that there would be no harmful concentrations of CO. Additionally, diesel particulate matter (DPM) emissions associated with operations in the ENCP were found to result in carcinogenic risk of less than one in a million and a chronic hazard index below 1.0; thus, the 2015 CPUs PEIR concluded that carcinogenic and chronic non-carcinogenic risks due to DPM are less than significant. (City of San Diego, 2015a, p. 5.3-26)

The PEIR also evaluated potential impacts to sensitive receptors from stationary sources. The PEIR found that the ENCP contains several areas where residential and other sensitive land uses would be placed adjacent to light industrial or commercial uses, and these land uses could be exposed to toxic air emissions that have the potential to be generated with operation of certain commercial and light industrial uses. As no project-specific information was available at the time of analysis, the PEIR concluded that stationary air emissions would be potentially significant. Mitigation Frameworks MM-AQ-3 and MM-AQ-4 were found to reduce impacts to less than significant levels. Potential impacts due to collocation were not evaluated as part of this PEIR because The ENCP would not allow the development of residential, commercial, and industrial land uses in close proximity. (City of San Diego, 2015a, p. 5.3-27)

The 2015 CPUs PEIR found that, at the time of certification, there were no known significant odor generators within or near the ENCP area. The PEIR did not note that any of the proposed land uses

were associated with the creation of objectionable odors. Therefore, impacts associated with odors would be less than significant.

Emerald Hills Project

The State Implementation Plan (SIP) drafted by the California Air Resource Board (CARB) outlines the measures that the State will take to improve air quality and attain the National Ambient Air Quality Standards (NAAQS). The SDAPCD Regional Air Quality Strategy (RAQS) outlines SDAPCD's plans, and control measures designed to attain the California Ambient Air Quality Standards (CAAQS), which are generally more stringent than the NAAQS.

The RAQS serves as the Air Quality Management Plan (AQMP) for the SDAB in which the project site is located. As was the case when the 2015 CPUs PEIR was certified in 2015, the SDAB is in "non-attainment" status for federal and State ozone (O_3) standards and the State PM_{10} and $PM_{2.5}$ standards.

The RAQS is largely based on population predictions by the San Diego Association of Governments (SANDAG). In the event that a project proposes development that is less dense than anticipated within the General Plan, the project would likewise be consistent with the RAQS. If a project proposes development that is greater than that anticipated in the City General Plan and SANDAG's growth projections upon which the RAQS is based, the project could be in conflict with the RAQS and SIP and may have a potentially significant impact on air quality. Also, an individual project would be considered to have a cumulatively-considerable impact if the project results in emissions that exceed the screening thresholds after the implementation of all feasible mitigation measures.

The maximum residential growth anticipated by the project was accommodated within the growth projected by the ENCP. The project is consistent with the land use designation for the project site; therefore, the project would not result in an increase in emissions that are not already accounted for in the RAQS and would not conflict with the implementation of the RAQS or other portions of the SIP. Accordingly, the project's impacts would not increase beyond what was previously disclosed and would be fully within the scope of impacts identified in the 2015 CPUs PEIR. Impacts due to a conflict with the due to a conflict with the implementation of the RAQS or other portions of the SIP under the project would be consistent with the impacts identified in the 2015 CPUs PEIR. The project would contribute to, but would not increase the significant unavoidable impact disclosed by the 2015 CPUs PEIR due to a conflict with the RAQS or other portion of the SIP; thus, the project's impacts are within the scope of analysis of the 2015 CPUs PEIR.

Air quality emissions would occur during both the construction and operation of the project. The project's potential to exceed local and regional thresholds and the potential to result in a cumulatively considerable net increase in criteria pollutants for which the region is in non-attainment during both project construction and long-term operation are discussed below.

Construction Emissions

Construction activities associated with the project would result in emissions of volatile organic compounds (VOCs), nitrogen oxides (NO_X), (SO_X), carbon monoxide (CO), particulate matter 10 microns in diameter or less (PM_{10}), and particulate matter 2.5 microns in diameter or less ($PM_{2.5}$).

VOCs and NO_x are considered to be precursors to ozone. Construction related emissions are expected from the following construction activities:

- Demolition
- Site Preparation
- Grading (Import/Export)
- Land Development
- Paving
- Architectural Coating and Building

Project construction would include rubber-tired dozers, excavators, and concrete/industrial saws during demolition; rubber-tired dozers and crawler tractors during site preparation; graders, excavators, crawler tractors, scrapers, and rubber tired dozers during grading; forklifts, cranes, welders, and tractors/loaders/backhoes during land development; pavers, paving equipment, and rollers during paving; and air compressors during architectural coating and building. Construction is anticipated to commence in October 2025 and would last through January 2028. The proposed schedule includes many overlapping phases with demolition, site preparation, grading, and land development overlapping. The latest version of the CalEEMod version 22.1.1.20 was used for this project to calculate construction emissions, and these calculations are provided in Appendix 3.1 of the project-specific Air Quality Impact Analysis (*Appendix K1*) (Urban Crossroads, 2024a). The results of the calculations for project construction are shown in Table 2, *Overall Construction Emissions Summary.*

Under the modeled scenarios shown in Table 2 emissions resulting from the project construction would not exceed the criteria pollutant thresholds established by the City for emissions of any criteria pollutant. Thus, impacts due to an increase in criteria pollutants during the construction phase would be less than significant. As construction impacts to air quality would be less than significant, Mitigation Framework MM-AQ-1 is not applicable to the proposed project.

Operational Emissions

Operational activities associated with the project would result in emissions of VOCs, NO_X, SO_X, CO, PM_{10}, and $PM_{2.5}$. Operational emissions are expected from the following primary sources:

- Area Source Emissions
- Energy Source Emissions
- Mobile Source Emissions

Table 2 Overall Construction Emissions Summary

Year	Emissions (lbs/day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Summer (Smog Season)						
2026	3.71	19.03	33.26	0.05	1.39	0.50
Winter						
2025	7.30	65.32	64.56	0.12	10.05	5.69
2026	4.59	39.59	44.00	0.09	4.99	2.70
2027	63.31	6.12	9.41	0.01	0.37	0.27
2028	63.30	1.10	1.79	0.00	0.10	0.04
Maximum Daily Emissions	**63.31**	**65.32**	**64.56**	**0.12**	**10.05**	**5.69**
SDAPCD Regional Threshold	137	250	550	250	100	67
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**

Source: CalEEMod construction-source (unmitigated) emissions are presented in Appendix 3.1.

(Urban Crossroads, 2024a, Table 3-5)

Operational emissions from area sources include architectural coatings, consumer products, and landscape maintenance equipment. Consumer products include, but are not limited to detergents, cleaning compounds, polishes, personal care products, and lawn and garden products. Landscape maintenance equipment would generate emissions from fuel combustion and evaporation of unburned fuel. Equipment in this category would include lawnmowers, shedders/grinders, blowers, trimmers, chainsaws, and hedge trimmers used to maintain the landscaping of the project. Energy source emissions include combustion emissions associated with natural gas and electricity. Criteria pollutant emissions are emitted through the generation of electricity and the consumption of natural gas. The project-related operational air quality emissions derive primarily from vehicle trips. Table 3, *Summary of Maximum Daily Operational Emissions*, presents operational activities for summer and winter scenarios. As shown, project operation source emissions would not exceed SDAPCD regional thresholds of significance for any criteria pollutants. As operational impacts to air quality would be less than significant, Mitigation Framework MM-AQ-2 would not be applicable to the proposed project.

Table 3 Summary of Maximum Daily Operational Emissions

Source	Emissions (lbs/day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Summer (Smog Season)						
Mobile Source	4.07	2.37	25.38	0.06	5.49	1.42
Area Source	8.80	2.11	7.86	0.01	0.17	0.17
Energy Source	0.05	0.89	0.38	0.01	0.07	0.07
Total Maximum Daily Emissions	**12.93**	**5.37**	**33.61**	**0.08**	**5.73**	**1.66**
SDAPCD Regional Threshold	75	250	550	250	100	67
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**
Winter						
Mobile Source	3.99	2.61	24.39	0.06	5.49	1.42
Area Source	8.19	2.04	0.87	0.01	0.16	0.16
Energy Source	0.05	0.89	0.38	0.01	0.07	0.07
Total Maximum Daily Emissions	**12.24**	**5.53**	**25.63**	**0.08**	**5.73**	**1.66**
SDAPCD Regional Threshold	137	250	550	250	100	67
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**

Source: CalEEMod operation-source emissions are presented in Appendix 3.1.

(Urban Crossroads, 2024a, Table 3-6)

The project's impacts would be fully within the scope of the impacts identified in the Encanto Neighborhoods 2015 CPUs PEIR. Furthermore, due to emissions regulations becoming more stringent and the typical turnover of older pieces of construction equipment (older pieces of equipment being replaced with newer and less polluting pieces of equipment over time), project construction air quality emissions may be reduced in comparison to what was evaluated and disclosed by the 2015 CPUs PEIR.

CO "Hot Spot" Analysis

An adverse CO concentration, known as a "hot spot" would occur if an exceedance of the state one-hour standard of 20 parts per million (ppm) or the 8-hour standard of 9 ppm were to occur. CO hotspots are caused by vehicular emissions, primarily when idling at congested intersections. To establish a more accurate record of baseline CO concentrations affecting the San Diego Air Basin (SDAB), a CO "hot spot" analysis was conducted in 2003 for four busy intersections in Los Angeles at the peak morning and afternoon time periods. Similar considerations are also employed by the Bay Area Air Quality Management District (BAAQMD), which concludes that a given project would have to increase traffic volumes at a single intersection by more than 44,000 vehicles per hour in order to generate a significant CO impact. The proposed project would generate 1,107 trips and would not produce the volume of traffic required to generate a CO "hot spot" either in the context of the 2003 Los Angeles hot spot study or based on representative BAAQMD CO threshold considerations.

Therefore, CO "hot spots" are not an environmental impact of concern for the project. Localized air quality impacts related to mobile-source emissions would, therefore, be less than significant.

DPM-Related Health Risks

A Construction Health Risk Assessment (HRA) was prepared for the project by Urban Crossroads (Urban Crossroads, 2024e) (*Appendix K2)*. Sensitive receptors can include uses such as long-term health care facilities, rehabilitation centers, and retirement homes. Residences, schools, playgrounds, childcare centers, and athletic facilities can also be considered as sensitive receptors. The nearest residential receptors are located adjacent to the project site, along Tooley Street and Old Memory Lane. All other residential receptors would be located at greater distances and thus exposed to lower project related air emissions. The nearest non-residential sensitive receptors are the Johnson Magnet School and the NHA Head Start School, which are located across Old Memory Lane, west of the project site at 308 feet and 380 feet away, respectively.

During short-term construction activity, the project would also result in some diesel particulate matter DPM which is a listed carcinogen and toxic air contaminant (TAC) in the State of California. Given that the total construction DPM emissions are not of a magnitude and duration that could create substantial concentrations or significant air toxic risks to the nearest sensitive receptors during construction and the annual $PM_{2.5}$ emissions from equipment during each year of construction, any DPM generated from construction activity would result in less than significant ground level concentrations of DPM and not result in a significant health risks and no further evaluation is required. Additionally, significant operational source emissions would not occur and would not have the potential to impact sensitive receptors. (Urban Crossroads, 2024e) Therefore, the project would not expose sensitive receptors to substantial pollutant concentrations, and impacts would be less than significant.

Toxic Air Contaminants and Collocation

The project site would not be located in close proximity to off-site commercial or industrial uses, nor does the project propose such uses with the potential to generate significant toxic air contaminants. Impacts caused by the existing and future off-site industrial activities would be less than significant. As the project would not generate toxic air contaminants nor be co-located with uses that would generate toxic air contaminants, Mitigation Frameworks MM-AQ-3 and MM-AQ-4 would not be applicable to the project.

Odor

Under existing conditions, no known significant odor generators are located within or near the project site. Odor impacts would not significantly change with the implementation of the project. The development area and land uses would be in accordance with the ENCP and 2015 CPUs PEIR.

Potential odor sources associated with the project may result from construction equipment exhaust and the application of asphalt and architectural coatings during construction activities and the temporary storage of typical solid waste (refuse) associated with the project's (long-term operational) uses. Standard construction requirements would minimize odor impacts from construction. The construction odor emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of the respective phase of construction and is thus considered less than significant. It is expected that project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with the City's solid waste

regulations. The project would also be required to comply with SDAPCD Rule 51 to prevent occurrences of public nuisances. Therefore, odors associated with the project construction and operations would be less than significant.

Overall, based on the foregoing analysis and information, the project is within the scope of the analysis of the PEIR and there is no evidence that the project would require a major change to the PEIR. The project would not result in any new significant impact, nor would there be a substantial increase in the severity of impacts from that described in the PEIR.

NOISE

2015 CPUs PEIR

The 2015 CPUs PEIR noted that the ENCP area has the potential to expose noise-sensitive uses to noise levels in excess of standards established in the City's General Plan, and the Noise Abatement and Control Ordinance ("Noise Ordinance"; Section 59.5.0101 et seq. of the City's Municipal Code). The 2015 CPUs PEIR noted that mandatory compliance with federal, state, and local regulations and policies would reduce direct and indirect impacts associated with the generation of noise levels in excess of standards established in the General Plan or Noise Abatement and Control Ordinance. The 2015 CPUs PEIR also imposed Mitigation Frameworks MM-NOS-1 and MM-NOS-2, which require regulatory compliance to ensure that impacts related to exterior and interior noise are reduced. However, even with adherence to the Mitigation Framework, the 2015 CPUs PEIR found that impacts associated with increase in ambient noise could not be reduced to levels below significance, and a statement of overriding consideration was adopted. (City of San Diego, 2015a, pp. 5.4-31 through 5.4-34)

The 2015 CPUs PEIR found that the ENCP would result in the exposure of noise-sensitive residential land uses with the operation of commercial and industrial uses. However, the 2015 CPUs PEIR found that the City's noise policies, as contained in the General Plan and Noise Abatement and Control Ordinance, include policies and regulations that require noise studies for land uses proposed for potentially incompatible locations, limits on hours of operation for various noise-generating activities, limits on truck idling time, enclosures for external equipment (generators, HVAC units, etc.) that are adjacent to residential uses and standards for the compatibility of various land uses with the existing and future noise environment. Additionally, the 2015 CPUs PEIR noted that construction activities could result in temporary noise increases. In addition, the 2015 CPUs PEIR found that enforcement of federal, state, and local noise regulations, as well as ENCP policies, would reduce noise impacts. The 2015 CPUs PEIR also identified Mitigation Framework MM-NOS-3, which requires site-specific noise analysis prior to construction, and Mitigation Framework MM-NOS-4, which requires the implementation of best management practices during construction. However, the 2015 CPUs PEIR concluded that even with the implementation of the Mitigation Framework MM-NOS-3, potential impacts due to a conflict with the City's Noise Abatement and Control Ordinance would remain significant due to the unknown nature of specific project noise impacts. As such, impacts related to the generation of noise that exceed City standards were disclosed as a significant and unavoidable impact and a statement of overriding considerations was adopted. (City of San Diego, 2015a, pp. 5.4-35 through 5.4-44)

Emerald Hills Project

Construction-Related Activities

Construction activities associated with the project would increase ambient noise levels in the vicinity on an intermittent but temporary basis. Noise levels during construction would fluctuate depending on the construction phase, equipment type, and duration of use, distance between the noise source and receptor, and the presence or absence of barriers between the noise source and receptor. Consistent with the findings in the 2015 CPUs PEIR, the project would be subject to compliance with federal, State, and local regulations and policies, which would reduce construction-related noise impacts. In addition, in accordance with Mitigation Framework MM-NOS-3, a site-specific Noise Impact Analysis was prepared *(Appendix D)*. The site-specific Noise Impact Analysis details the construction noise analysis completed for the project, and the results are shown on Table 4, *Construction Nosie Level Compliance*. As shown, construction noise due to the project would not exceed the City of San Diego significance threshold during project construction activities, and impacts would be less than significant, and no mitigation would be required. (Urban Crossroads, 2024c) As construction noise impacts would be less than significant, Mitigation Framework MM-NOS-4 would not be applicable to the proposed project.

Table 4 Construction Noise Level Compliance

Receiver Location[1]	Construction Noise Levels (dBA L_{eq})		
	Highest Construction Noise Levels[2]	Threshold[3]	Threshold Exceeded?[4]
R1	67.6	75	No
R2	67.2	75	No
R3	65.7	75	No
R4	67.5	75	No
R5	67.1	75	No
R6	62.4	75	No

[1] Noise receiver locations are shown on Exhibit 10-A.
[2] Highest construction noise level calculations based on distance from the construction noise source activity to nearby receiver locations as shown on Table 12-2.
[3] Construction noise level thresholds as shown on Table 4-2.
[4] Do the estimated Project construction noise levels exceed the construction noise level threshold?

(Urban Crossroads, 2024c, Table 12-3)

Operational Activities

This section evaluates the project's potential to exceed the noise significance criteria contained in the Noise Element of the General Plan. The project would result in a slight increase in regional and local traffic volumes and is anticipated to generate a maximum of 1,107 trips, which would represent an incremental increase to the existing roadway volumes. To result in a 3 decibel traffic noise increase, traffic volumes must double. Due to the nature of the slight traffic increase, the project is not expected to generate a perceptible noise increase of 3 dbA (A-weighted decibels) at nearby sensitive land uses adjacent to study area roadways. Due to the low traffic volumes generated by the project, the off-site traffic noise levels are considered less than significant.

In regard to on-site land uses, the project-related noise sources are expected to include: rooftop air handling units, generators, and surface driveway activity. The site-specific Noise Impact Analysis (*Appendix D*) includes analysis of operational noise levels against the City of San Diego's exterior

noise level thresholds. As shown on Table 5, *Operational Noise Level Compliance*, operational noise levels associated with the project would satisfy the City's daytime and nighttime exterior noise level standards at the nearest receiver locations. Therefore, operational noise impacts would be less than significant.

Due to the project's location, the project site has limited exposure to local roadways. The only local roadway in close proximity to the project site is 60th Street, which is designated as a two-lane collector by the Encanto Neighborhoods Community Plan. The SR-94 freeway is the nearest freeway to the project site and is located more than 1,000 feet away. However, the project would not alter the speed on an existing roadway. The site-specific noise analysis found that the project would be exposed to 60 dBA CNEL or less in traffic noise, and project impacts on vehicle traffic noise would be less than significant. Thus, Mitigation Frameworks MM-NOS-1 and MM-NOS-2 would not be applicable to the proposed project.

Table 5 Operational Noise Level Compliance

Receiver Location[1]	Project Operational Noise Levels (dBA Leq)[2]			Noise Level Standards (dBA Leq)[3]			Noise Level Standards Exceeded?[4]		
	Daytime	Evening	Nighttime	Daytime	Evening	Nighttime	Daytime	Evening	Nighttime
R1	40.5	40.5	38.7	50	45	40	No	No	No
R2	40.0	40.0	38.3	50	45	40	No	No	No
R3	37.2	37.2	35.4	50	45	40	No	No	No
R4	41.6	41.6	39.8	50	45	40	No	No	No
R5	41.4	41.4	39.7	50	45	40	No	No	No
R6	34.4	34.4	32.6	50	45	40	No	No	No

[1] See Exhibit 10-A for the receiver locations.
[2] Proposed Project operational noise levels as shown on Tables 11-2, 11-3 and 11-4.
[3] Exterior noise level standards for residential land use, as shown on Table 3-1. Per the City Significance Determination Thresholds, the limit at a residential and non-residential property is the arithmetic mean of the two zones.
[4] Do the estimated Project operational noise source activities exceed the noise level standards?
"Daytime" = 7:00 a.m. to 9:00 p.m.; "Nighttime" = 9:00 p.m. to 7:00 a.m.

(Urban Crossroads, 2024c, Table 11-5)

The generation of noise from certain types of land uses in the project area could cause potential land use incompatibility. As stated previously, buildout of the project would not result in the collocation of residential and non-residential uses within or adjacent to the project site. Noise levels at the property line that exceed Section 59.5.0401 of the City's Municipal Code are considered potentially significant. Section 59.5.0401 sets the exterior noise limit for 50 dBA Leq for daytime hours of 7 a.m. to 7 p.m. and 45 dBA L_{eq} during noise sensitive nighttime hours of 7 p.m. to 7 a.m. As found in the site-specific Noise Impact Analysis (*Appendix D*), the project would generate daytime and nighttime operational noise level increases ranging from less than 0.0 to 0.7 dBA Leq compared to the existing ambient noise level. Therefore, the project would result in a less-than-significant increase to the existing ambient noise level. As the project would not cause any property line noise limits to be exceeded, Mitigation Framework MM-NOS-3 is not applicable to the project.

The project would be consistent with the land use and zoning designations applied to the site and is not anticipated to exceed noise thresholds or to have a significant impact on noise. In addition, in accordance with the 2015 CPUs PEIR Mitigation Framework MM-NOS-3, a site-specific Noise Impact Analysis of on-site generated noise uses was conducted *(Appendix D)*, which found that the project would result in less-than-significant impacts and no site-specific mitigation is required. The site-

specific Noise Impact Analysis (*Appendix D*) details the construction noise analysis completed for the project, and the results are shown in Table 4. As shown, construction noise due to the project would not exceed the City of San Diego significance threshold during project construction activities, and impacts would be less than significant. As the project construction noise would not exceed the construction noise limits, Mitigation Framework MM-NOS-4 is not applicable to the project.

Overall, based on the foregoing analysis and information, the project is within the scope of the analysis of the PEIR, and there is no evidence that the project would require a major revision to the PEIR. The project would not result in any new significant impact, nor would there be a substantial increase in the severity of impacts from that described in the PEIR.

BIOLOGICAL RESOURCES

2015 CPUs PEIR

The 2015 CPUs PEIR found that implementation of the ENCP would have the potential to directly impact sensitive plants and animals through the loss of habitat or indirectly by locating development adjacent to the MHPA. Affected sensitive species include the least Bell's vireo, coastal California gnatcatcher, Cooper's hawk, and coastal cactus wren. Additionally, the 2015 CPUs PEIR noted that development adjacent to the MHPA has the potential for secondary impacts that may degrade the habitat value or disrupt animals within the preserve area. The 2015 CPUs PEIR found that significant direct and indirect impacts on sensitive plant and animal species would be mitigated at the project level through implementation of Mitigation Framework MM-BIO-1, which requires site-specific environmental review, analysis of potential impacts on biological resources, and recommendations for mitigation to reduce significant project-level impacts to below a level of significance. (City of San Diego, 2015a, pp. 5.5-41 through 5.5-49)

The 2015 CPUs PEIR found that subsequent development projects constructed in accordance with the ENCP have the potential to interfere with wildlife nesting within riparian habitats and upland habitats. The 2015 CPUs PEIR identified Mitigation Framework BIO-3, which requires mitigation to reduce potentially significant impacts that would interfere with the nesting, foraging, or movement of wildlife species be identified in site-specific biological resources report prepared in accordance with City Biology Guidelines. The 2015 CPUs PEIR concluded that, with compliance to applicable ENCP policies, development standards, and regulations, as well as the implementation of the Mitigation Framework BIO-2, which requires regulatory requirements for projects with direct impacts on wetlands and jurisdictional resources, impacts to migratory fish or wildlife would be reduced to less-than-significant levels. (City of San Diego, 2015a, pp. 5.5-56 through 5.5-60)

The 2015 CPUs PEIR found that the ENCP would result in impacts to cottonwood-willow riparian forest, southern riparian scrub, and non-native riparian habitats. The PEIR found that compliance with the ESL Regulations, the MSCP Subarea Plan, the City's Biology Guidelines, and implementation of Mitigation Framework MM-BIO-2 would serve to reduce impacts on wetlands, vernal pools, and other jurisdictional water resources at the program level to below a level of significance. (City of San Diego, 2015a, pp. 5.5-52 through 5.5-56)

The 2015 CPUs PEIR found that the implementation of the ENCP would result in both temporary and permanent impacts on sensitive vegetation communities, as identified by the MSCP. Additionally, the

2015 CPUs PEIR noted that the MHPA is mapped within the ENCP area, and future development could have a potential indirect effect on the MHPA. The 2015 CPUs PEIR concluded that compliance with established development standards and regulations, along with implementation of Mitigation Frameworks MM-BIO-1 and MM-LU-2, would serve to reduce impacts on MHPA lands at the program level to below a level of significance. (City of San Diego, 2015a, pp. 5.5-62 through 5.5-65)

The 2015 CPUs PEIR found that the ENCP would have the potential to introduce invasive species into the area due to the large extent of development anticipated within the ENCP area. The 2015 CPUs PEIR concluded that, assuming compliance with MHPA Land Use Adjacency Guidelines and implementation of ENCP policies, impacts would be less than significant. (City of San Diego, 2015a, pp. 5.5-42 through 5.5-49)

The 2015 CPUs PEIR found that future development projects implemented in accordance with the ENCP would potentially result in the loss of southern cottonwood-willow riparian forest, southern riparian scrub, mule fat scrub, and non-native riparian. Therefore, the 2015 CPUs PEIR found that implementation of the ENCP would result in impacts to both wetland and non-wetland streambed waters. The 2015 CPUs PEIR identified Mitigation Framework MM-BIO-2 to reduce impacts, which requires compliance with state and federal regulations as well as the City of San Diego ESL Regulations. The 2015 CPUs PEIR concluded that compliance with ENCP policies, ESL Regulations, the MSCP Subarea Plan, the City's Biology Guidelines, and implementation of the Mitigation Framework would reduce impacts on wetlands, vernal pools, and other jurisdictional water resources at the program level to below a level of significance. (City of San Diego, 2015a, pp. 5.5-52 through 5.5-56)

The 2015 CPUs PEIR concluded that future construction activities would be required to comply with the recommendations included in project-specific acoustical reports prepared in accordance with City Acoustical Report Guidelines, the General Plan, ENCP policies, and other regulatory or guidance documents. Additionally, the 2015 CPUs PEIR imposed Mitigation Framework NOI-4, which requires compliance with the City's Noise Abatement and Control Ordinance to reduce construction-related noise impacts. The 2015 CPUs PEIR also imposed Mitigation Framework LU-2, which requires development projects adjacent to designated MHPA areas to comply with the Land Use Adjacency Guidelines in the MSCP in terms of noise. The 2015 CPUs PEIR concluded, with the implementation of Mitigation Frameworks, impacts would be reduced to a level below significance (City of San Diego, 2015a, pp. 5.5-52 through 5.5-56)

Emerald Hills Project

In accordance with Mitigation Framework MM-BIO-1, a site-specific Biological Technical Report (BTR, *Appendix A*), authored by Helix Environmental Planning and dated February 2025, was prepared for the project to address potential impacts to sensitive species and habitat and identify project-specific mitigation.

Sensitive Habitat

The project site contains 0.4 acre of Diegan coastal sage scrub (Tier II), 29.2 acres of non-native grassland (Tier IIIB), 0.3 acre of non-native vegetation (Tier IV), 0.1 acre of disturbed land (Tier IV), and 1.2 acres of developed land (Tier IV). The MSCP and Biology Guidelines identify that Tier I to Tier IIIB habitats are considered sensitive. The project would result in a total of 0.4 acre of impacts to Diegan coastal sage scrub (disturbed), a Tier II habitat outside of the MHPA. The project would also

result in 29.2 acres of impacts to non-native grassland, a Tier IIIB habitat outside of the MHPA. Habitat impacts are shown below in Table 6, *Habitat Impacts*, and Figure 7 of the project-specific BTR.

Table 6 Habitat Impacts

Vegetation Community	Tier[1]	Impacts (acres) [2]		
		On-site	Off-site	Total[3]
Diegan Coastal Sage Scrub (including disturbed)	II	0.4	--	0.4
Non-native Grassland	IIIB	29.2	--	29.2
Non-native Vegetation	IV	0.3	--	0.3
Disturbed Land		0.1	--	0.1
Developed Land		1.2	0.2	1.4
TOTAL		**31.2**	**0.2**	**31.4**

[1] Tiers refer to City MSCP Subarea Plan habitat classification system.

[2] Habitat acreage rounded to the nearest 0.1 acre for uplands. Totals reflect rounding. Off-site portion of the project is entirely developed land.

[3] Acreage for impact areas within the project site, as well as off-site impact areas.

(Helix, 2025, Table 5)

Impacts to Tier II and IIIB habitat are considered significant. All Impacts are outside of the MHPA. In accordance with Mitigation Framework MM-BIO-1, the project's site-specific BTR (*Appendix A*) identifies Mitigation Measure MM BIO-2 (see Addendum Section VIII below), which reduces impacts to Tier II and IIIB habitats to a less-than-significant level. Mitigation is shown below in Table 7, *Sensitive Habitat Impacts and Mitigation* as well as in Table 6 of the project-specific BTR. The project would comply with the MSCP and Biology Guidelines.

Table 7 Sensitive Habitat Impacts and Mitigation

Vegetation Community	Tier	Impacts (acres)	Mitigation Ratio[1]	Required Mitigation (acres)[1]	Proposed Mitigation (acres)[1]
Diegan Coastal Sage Scrub (disturbed)	II	0.4	1:1	0.4	0.4
Non-native Grassland	IIIB	29.2	0.5:1	14.6	14.6
TOTAL		**29.6**	**-**	**15.0**	**15.0**

[1] Mitigation ratios are consistent with the City's Biology Guidelines Table 3 (City 2018) and the Southeastern San Diego and Encanto Neighborhoods Community Plan Updates Project Final PEIR Table 5.5-4 (Dyett & Bhatia 2015) and assume all impacts are outside the MHPA and all mitigation is inside the MHPA. If mitigation were to occur outside of the MHPA, the ratio would be 1.5:1 for Tier II habitat and 1:1 for Tier IIIB habitat. Mitigation ratios are because no narrow endemic species were found during focused species surveys.

(Helix, 2025, Table 6)

Special-status Plants

Two special-status plant species, small-flowered morning glory and decumbent goldenbush, were observed within the project site.

A total of 74 small-flowered morning glory plants were observed beneath an overstory of non-native grasses, prickly wild lettuce, and mustards. This species is not federally or state listed, not listed as a

narrow endemic, and is not a MSCP-covered species. Furthermore, this species does not occur in unusually high concentrations on the project site and is not a significant population. Impacts to small-flowered morning glory would be less than significant and no mitigation is required.

An estimated 467 decumbent goldenbush plants were observed in two clusters and scattered throughout the project site. This species is not federally or state listed, not listed as a narrow endemic, and is not a MSCP-covered species. In addition, this species does not occur in unusually high concentrations on the project site, and is distributed widely throughout the City's MHPA, including in the general areas of the proposed mitigation parcels. Impacts to decumbent goldenbush would be less than significant and no mitigation is required.

A total of 32 special-status plant species known to occur within three miles of the site, or included on the City's MSCP Narrow Endemic list, were analyzed for their potential to occur within the project site. Spring and summer focused plant species surveys were conducted to determine if narrow endemic plant species with the potential to occur on-site are present. No other special-status plant species are expected to occur due to the lack of suitable habitat.

Special-status Animals
No sensitive animal species were identified on the project site. As addressed in more detail below, there is potential for sensitive species to forage or nest on the project site.

Cooper's hawk has potential to nest on or adjacent to the site and impacts to nesting Cooper's hawk would be potentially significant. The implementation of site-specific Mitigation Measure MM-BIO-1 would reduce impacts to Cooper's hawk to less than significant. A pre-construction nesting bird survey will be conducted to determine the presence of any nesting birds. Avoidance measures would be provided for nesting birds. This site-specific mitigation MM-BIO-1 (see Addendum Section VIII below) is provided in accordance with Mitigation Framework MM-BIO-3.

Prairie falcon, a watch list species, has the potential to forage on site. Impacts to prairie falcon foraging habitat would be potentially significant. To reduce this potential impact, project-specific compensatory habitat Mitigation Measure MM-BIO-2 (see Addendum Section VIII below) would be provided in accordance with Mitigation Framework MM-BIO-1.

The nearest off-site MHPA with potential for coastal California gnatcatcher is more than 300 feet to the northwest on the other side of Emerald Hills Park. Considering this distance, indirect noise impacts to breeding coastal California gnatcatchers located in the off-site MHPA would be considered less than significant.

The nearest coastal cactus wren record is located approximately 0.5-mile southwest of the project site. No suitable habitat for the coastal cactus wren, including cacti and native scrub vegetation, was observed on-site. As such, coastal cactus wren is not expected on site. No impact to this species would occur.

A Crotch's bumble bee (*Bombus crotchii*) survey was conducted (Appendix A). The habitat assessment identified the site as having low potential for the species. No Crotch's bumble bee was observed during the focused surveys conducted on May 1, 3, and 21 and June 19, 2024. Thus, project impacts to Crotch's bumble bee would be less than significant.

With the implementation of the site-specific mitigation measures MM-BIO-1 and MM-BIO-2 (see Addendum Section VIII below), as required by PEIR Mitigation Framework MM-BIO-1, the project would not result in a substantial adverse impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species, and impacts would be less than significant.

Wetlands

The project site does not contain wetland habitat. No features were observed on the project site that would be considered Army Corps of Engineers Waters of the United States, CDFW Waters of the State, or City wetlands. No surface water flow or ponding water was observed on the site, and no evidence of water flow or ponding was observed. No wetland impact would occur. As the project would have no impacts to wetlands, Mitigation Framework MM-BIO-2 would not be applicable to the proposed project.

Wildlife Movement and Nursery Sites

The project would not impede the movement of any native, resident, or migratory fish or wildlife species or interfere with established native, resident, or migratory wildlife corridors. The project site is currently surrounded by developed land and is not expected to provide for regional or localized wildlife movement. Wildlife may continue to use the Emerald Hills Branch of Chollas Creek in the MHPA to the west of the project site and Emerald Hills Park. Chollas Creek is known to provide dispersal of urban acclimated species. In addition, the project would not interfere with linkages identified in the MSCP Plan or the use of native wildlife nursery sites. Birds could move through the site; however, the species that would be likely to use the project site would be the same common, urban-adapted species that would use the adjacent residential development. A less than significant wildlife corridor impact would occur. As the project would have a less than significant wildlife corridor impact, the Mitigation Framework MM-BIO-3 portion related to wildlife corridors would not be applicable to the project.

MSCP Consistency

Implementation of the project would result in development on-site that is consistent with the ENCP. The project site is located within the boundaries of the City of San Diego's MSCP Subarea Plan. The project would be required to comply with federal, state, and City regulations as well as implement site-specific Mitigation Measures MM-BIO-1 and MM-BIO-2 included in the project Mitigation Monitoring and Reporting Program (MMRP; see Addendum Section VIII below). Therefore, the project would not result in a conflict with the provision of the City's MSCP Subarea Plan. The project is not located adjacent to the MHPA. The nearest MHPA is located approximately 278 feet to the south, beyond the two rows of houses on either side of Old Memory Lane and approximately 316 feet to the northwest of the site, across Emerald Hills Park. Thus, the project would not result in impacts to sensitive habitats located within the MHPA. As the site is not located adjacent to the MHPA, Mitigation Framework MM-LU-2 is not applicable to the project.

The project would be developed in accordance with ENCP policies, which includes policies and goals that intend to remove invasive species within the ENCP area (including the project site). Additionally, landscape plans for the project were reviewed by city staff and a qualified biologist to confirm that they do not include any invasive species.

Overall, based on the foregoing analysis and information, the project is within the scope of the analysis of the PEIR and there is no evidence that the project would require a major change to the PEIR. The project would not result in any new significant impact, nor would there be a substantial increase in the severity of impacts from that described in the PEIR.

HYDROLOGY AND WATER QUALITY

2015 CPUs PEIR

The 2015 CPUs PEIR found that the land uses proposed as part of the ENCP could increase the impervious area above pre-project conditions. However, the 2015 CPUs PEIR found that the majority of existing communities in the ENCP are not anticipated to change significantly in land use or development intensity. The 2015 CPUs PEIR found that the ENCP designates some areas adjacent to creeks for future development and alter land use patterns in certain areas of the CPU. The 2015 CPUs PEIR noted that future projects within the ENCP would be subject to City floodplain regulations and City Storm Water Standards, including requirements and obligations under the Municipal Storm Water Permit. Additionally, the 2015 CPUs PEIR found that hydromodification design features would reduce flow-duration impacts to downstream receiving waters for applicable projects. The 2015 CPUs PEIR noted that each project within the ENCP would be required to address drainage impacts on a project-level basis. Because the amount and rate of runoff and the alteration of existing drainage patterns were found to be dependent upon future project design, the 2015 CPUs PEIR concluded that impacts would be potentially significant and would require the implementation of Mitigation Framework MM-HYD/WQ-1, which requires adherence to City and RWQCB regulations. The 2015 CPUs PEIR found that implementation of Mitigation Framework MM-HYD/WQ-1 would reduce impacts to levels below significance. (City of San Diego, 2015a, pp. 5.6-16 through 5.6-23)

The 2015 CPUs PEIR found that future development within the ENCP area could result in impacts to surface and ground water quality and could result in increases in pollutant discharges including downstream sedimentation. However, the 2015 CPUs PEIR noted that the proposed redevelopment of a portion of the land within the ENCP area could result in the enhancement of water quality, as the majority of existing development within the ENCP was established prior to adoption of storm water regulations. The 2015 CPUs PEIR found that subsequent projects would be subject to certain minimum storm water requirements and must demonstrate that storm water BMPs and Low Impact Development (LID) standards would reduce the amount of pollutants transported from a future development site to downstream receiving waters. Despite the requirement for future projects to comply with the City Storm Water Standards, the 2015 CPUs PEIR found that impacts associated with water quality would be potentially significant. The 2015 CPUs PEIR found that strict adherence to Mitigation Framework MM-HYD/WQ-2, which requires regulatory compliance with the City's Storm Water Runoff and Drainage Regulations (Chapter 14, Article 2, Division 2 of the LDC) and other appropriate agencies (e.g., RWQCB), as well as other applicable regulations, impacts due to discharges into surface or ground water or due to increases in pollutant discharges including downstream sedimentation would be less than significant. (City of San Diego, 2015a, pp. 5.6-28 through 5.6-31)

Emerald Hills Project

Hydrology

Hunsaker & Associates conducted a Drainage Study (*Appendix E1*) for the project (Hunsaker, 2024a), which demonstrates compliance with regulations and satisfies Mitigation Framework MM-HYD/WQ-1. The following discussion is based on this drainage study.

Under existing conditions, the project site is developed with two broadcast towers and a 7,050 square foot transmitter building. Runoff from the project site drains to three primary discharge locations. Flows from the northeastern portion of the project site move easterly and drain at the northeast corner of Dippers Street and 60th Street before ultimately emptying into Chollas Creek.

Drainage originating from the southwestern portion of the site flows into an existing brow ditch along the site's southern boundary and into an existing storm drain system before merging with drainage from Old Memory Lane and ultimately emptying into the South Chollas Creek Channel. Runoff from the eastern part of the northern portion of the project site flows toward an existing headwall and into an existing storm drain system and discharging into the South Chollas Creek Channel. The runoff from the remainder of the northern portion of the site flow in a northernly direction before joining the storm drain. (Hunsaker, 2024b)

Future development associated within the project would increase impervious surfaces in the project area, which would lead to increased runoff that could exceed the capacity of existing or planning stormwater drainage systems and/or provide additional sources of polluted runoff. However, the project is required to design storm drain systems that comply with ENCP policies pertaining to the development of adequate storm drain facilities, including Policies P-PF-13 and P-UD-51, which outlines requirements for improvement programs and implementation of storm water best management practices (BMPs). Additionally, in accordance with the City's Municipal Storm Water Permit, future development on the project site would be required to implement BMPs during construction.

Onsite drainage improvements would include three on-site water quality/hydromodification basins with a storm drain system to safely convey runoff through the project to the biofiltration basins to address water quality, hydromodification and peak flow mitigation before discharging into the existing drainage system similar to existing conditions. In the proposed conditions, the site consists of three drainage areas. Each of these areas will have its runoff collected by proposed storm drain inlets and subsequently routed through the on-site storm drain system, leading to its associated biofiltration basin. In the proposed conditions, the flow pattern would remain similar, and the flows from the developed project site area would connect to the same existing off-site storm drainage network. In order to evaluate the project's proposed drainage conditions, a project-specific Drainage Study was prepared and is contained in *Appendix E1*. As detailed in the Drainage Study, under proposed conditions, attenuation provided by the three-water quality/hydromodification basins on-site would result in a total reduction of 29.61 cubic feet per second (cfs) to Chollas Creek compared to existing conditions and would not increase100-year storm event runoff. Therefore, the project would not result in an increase in impervious surfaces and associated increased runoff, nor would the project result in a substantial alteration to on-and off-site drainage patterns due to changes in runoff flow rates or volumes. Additionally, because the project would not result in substantial

increases in runoff, the project would not result in an adverse effect on hydrology or water quality associated with increased runoff. Impacts would be less than significant. (Hunsaker, 2024a)

Water Quality

To demonstrate compliance with regulations and satisfy Mitigation Framework MM-HYD/WQ-2, a Storm Water Quality Management Plan (SWQMP) was prepared by Hunsaker & Associates for the project (*Appendix I)*, which includes construction and operation BMPs that would prevent pollutant discharge to receiving waters. Additionally, the project would be subject to applicable policies included in the 2015 CPUs PEIR. The project would comply with the standards outlined in the City of San Diego Drainage Design Manual and City of San Diego Storm Water Standards. Additionally, in accordance with the City's Municipal Storm Water Permit, future development on the project site would be required to implement BMPs during construction. The City's Municipal Separate Storm Sewer System (MS4) NPDES Permit requires the project applicant to prepare and submit to the San Diego Regional Quality Control Board (SDRQCB) for approval a project-specific Storm Water Pollution Prevention Plan (SWPPP), which would address potential water quality issues in accordance with regulations during construction. Overall, the project would comply with water quality regulations and impacts would be less than significant.

Groundwater

The project would be required to comply with existing policies, regulations to ensure impacts to local or regional surface or ground water quality impacts would be less than significant. This includes compliance with the Storm Water Standards Manual and Storm Water Runoff and Drainage Regulations, which the project demonstrated consistency within the aforementioned project-specific Drainage Study (*Appendix E1*) (Hunsaker, 2024a) and SWQMP (*Appendix I)* (Hunsaker, 2024b). Impacts to groundwater would be less than significant.

Flooding

As noted in the 2015 CPUs PEIR and in accordance with the City's 2022 Significance Determination Thresholds, significant impacts associated with altered flow patterns would result if a project-related increase in stormwater flows would increase on- or off-site flooding hazards pursuant to mapped FEMA floodplains. The project site is located in FEMA Flood Map Zone X, Area of Minimal Flood Hazard; therefore, the project would not result in alterations to the course or flow of flood waters and impacts would be less than significant. Additionally, and as discussed above, the project would not increase runoff under the 100-year storm flow scenario as compared to existing conditions. The project complies with the City's Storm Water Standards and applicable General Plan and ENCP policies related to flood hazards.

The project would be required to comply with existing policies, regulations to ensure impacts to local or regional surface or ground water quality impacts would be less than significant.

Overall, based on the foregoing analysis and information, the project is within the scope of the analysis of the PEIR and there is no evidence that the project would require a major change to the PEIR. The project would not result in any new significant impact, nor would there be a substantial increase in the severity of impacts from that described in the PEIR.

HISTORICAL RESOURCES

2015 CPUs PEIR

The 2015 CPUs PEIR found that the ENCP area contains two properties listed on the San Diego Register of Historic Resources. Additionally, the 2015 CPUs PEIR noted that there is potential for archaeological resources in the ENCP areas, most likely along Chollas Canyon and other waterways, where archaeological sites have previously been documented in the ENCP area. The 2015 CPUs PEIR also determined that impacts from future development also could occur at the project-level and identified Mitigation Frameworks MM-HIST-1 and MM-HIST-2 to reduce potential aesthetic and physical impacts to prehistoric and historical resources. The 2015 CPUs PEIR concluded that implementation of Mitigation Frameworks HIST-1 and HIST-2 would reduce potentially significant impacts associated with aesthetic and physical alteration or destruction of prehistoric and historic resources to below a level of significance. (City of San Diego, 2015a, pp. 5.7-28 through 5.7-33)

The 2015 CPUs PEIR found that construction of future projects associated with the implementation of the ENCP could result in significant impacts to religious or sacred uses. The 2015 CPUs PEIR concluded that with implementation of Mitigation Framework MM-HIST-1, impacts to religious or sacred sites would be reduced to below a level of significance. (City of San Diego, 2015a, pp. 5.7-34 through 5.7-38)

The 2015 CPUs PEIR found that ground-disturbing activities of future implementing development projects associated with the ENCP could result in significant impacts to human remains that may be buried beneath the surface. The 2015 CPUs PEIR concluded that with implementation of Mitigation Framework MM-HIST-1, impacts to human remains would be reduced to below a level of significance.

Emerald Hills Project

In accordance with 2015 CPUs PEIR Mitigation Frameworks MM-HIST-1 and MM-HIST-2, a site-specific Historical Resources Technical Report (*Appendix B)* and a site-specific Cultural Resources Survey (*Appendix F*) were prepared for the project site by Brian F. Smith and Associates (BFSA). As detailed below, the preparation of these site-specific reports satisfies Mitigation Frameworks MM-HIST-1 and MM-HIST-2.

Prehistoric Resources

The project's site-specific Phase I Cultural Resources Survey (*Appendix F*) found that the project site does not contain any previously recorded archaeological sites within the project boundaries. As indicated in *Appendix F,* due to the history of disturbance (i.e., previous development and on-going routine disking) on the project site and the lack of cultural resources identified as a result of the survey and records search, there is a low potential for the project to impact previously undiscovered resources and no archaeological or Native American monitoring is recommended. Therefore, impacts to prehistoric resources would be less than significant.

Historical Resources

Under existing conditions, and consistent with the conditions that existed at the time the 2015 CPUs PEIR was certified, the project site is developed with a 7,050-square-foot transmitter building and

two broadcast towers built between 1948 and 1949. As noted in the Historical Resources Technical Report (*Appendix B*), the structures associated with the project site were evaluated for historic significance as defined by the City of San Diego Historic Resources Board (HRB), National Register of Historic Places (NRHP) criteria, and California Register of Historical Resources (CRHR) criteria. BFSA found that the property is not considered eligible under City of San Diego HRB, CRHR, or NRHP criteria, and development of the site associated with the project would not significantly impact the history or the overall character of the surrounding neighborhood. Due to a lack of integrity or association with significant persons or events, and ineligibility for historical resource designation, BFSA concluded that the structures located on the project site do not comprise significant historical resources and impacts would be less than significant.

Religious or Sacred Uses and Human Remains

The Sacred Lands File Search with the Native American Heritage Commission returned with negative results (Appendix F). As suggested by the Native American Heritage Commission, the Archaeologist also contacted 20 local tribes requesting information regarding any tribal resources located on the project site. No responses were received from the tribes. The site is not known to contain any religious or sacred uses. In the event that human remains are discovered during project grading, work shall halt in that area and the procedures set forth in the California Public Resources Code (Section 50987.98) and State Health and Safety Code (Section 7050.5), and in the federal, state, and local regulations described above shall be undertaken.

Overall, based on the foregoing analysis and information, the project is within the scope of the analysis of the PEIR and there is no evidence that the project would require a major change to the PEIR. The project would not result in any new significant impact, nor would there be a substantial increase in the severity of impacts from those described in the PEIR.

PALEONTOLOGICAL RESOURCES

2015 CPUs PEIR

The 2015 CPUs PEIR found that future projects implemented in accordance with the ENCP could significantly impact a paleontological resource. The 2015 CPUs PEIR identified Mitigation Framework MM-PALEO-1 to reduce impacts, which generally requires future projects to monitor for paleontological resources in accordance with the City's Paleontological Resources Guidelines and CEQA Significance Thresholds. The 2015 CPUs PEIR found that with implementation of Mitigation Framework MM-PALEO-1, program-level impacts related to paleontological resources would be reduced to below a level of significance. (City of San Diego, 2015a, pp. 5.8-6 through 5.8-8)

Emerald Hills Project

In accordance with Mitigation Framework MM-PALEO-1, a review for potential impacts to paleontological resources was completed. The project site underlying geologic formations and soils consists of artificial fill, Quaternary-age Colluvium, and Tertiary-age Mission Valley Formation. Mission Valley Formation is considered to have a high-sensitivity for fossil materials. Excavations associated with project construction would encroach into the sensitive soils found on the project site. Therefore, ground-disturbing construction activities associated with the project would have the potential to result in significant impacts to paleontological resources that may be buried beneath

the surface. In accordance with Mitigation Framework MM-PALEO-1 and the associated compliance with the City's Paleontological Resources Guidelines, project-specific mitigation measure MM-PALEO-1 is required (see Addendum Section VIII below). Consistent with the 2015 CPUs PEIR, the project would have a less-than-significant impact associated with paleontological resources with the implementation of MM-PALEO-1.

Overall, based on the foregoing analysis and information, the project is within the scope of the analysis of the PEIR and there is no evidence that the project would require a major change to the PEIR. The project would not result in any new significant impact, nor would there be a substantial increase in the severity of impacts from that described in the PEIR.

GEOLOGY AND SEISMIC HAZARDS

2015 CPUs PEIR

The 2015 CPUs PEIR found that the geologic hazards are present in the ENCP area, and implementation of the ENCP was found to potentially expose people or structures to geologic hazards such as earthquakes, landslides, mudslides, and ground failure. The 2015 CPUs PEIR found that the ENCP area includes zones designated with City of San Diego Hazard Categories 12, where surface rupture risk is considered low to moderate, and 13, where risk of surface rupture is considered moderate to high. Additionally, the 2015 CPUs PEIR concluded that the ENCP area contains low to moderate risk for slope failure, and a geotechnical study in accordance with the City's Geotechnical Study Requirements and Land Development Code (LDC) may be required. The 2015 CPUs PEIR found that the ENCP area is considered to be low risk to damage from liquefaction-related hazards, and no portion of the ENCP area is located within a tsunami or seiche inundation area. The 2015 CPUs PEIR concluded that future development implemented in accordance with the ENCP that would potentially result in impacts related to geologic hazards would be required to implement Mitigation Framework MM-GEO-1, which requires adherence to site-specific geotechnical reports, the City's Municipal Code, and California Building Code. Following the implementation of the Mitigation Framework, impacts were found to be reduced to less-than-significant levels. (City of San Diego, 2015a, pp. 5.9-18 through 5.9-21)

The 2015 CPUs PEIR found that the majority of the ENCP area is developed and has previously been graded; however, the 2015 CPUs PEIR noted that implementation of the ENCP would allow for the intensification of some land uses that could lead to construction and grading activities that could expose topsoil and increase soil erosion from water and wind. The 2015 CPUs PEIR identified Mitigation Framework MM-GEO-2 to reduce potential impacts, which requires future development projects to adhere to the City's Grading Regulations, National Pollutant Discharge Elimination System (NPDES) permit requirements, and the recommendations included in future site-specific geotechnical reports completed in accordance with the City's Municipal Code Requirements. The 2015 CPUs PEIR concluded that, assuming compliance with applicable General Plan and ENCP policies and implementation of Mitigation Framework MM-GEO-2, impacts associated with erosion would be reduced to below a level of significance. (City of San Diego, 2015a, pp. 5.9-22 through 5.9-28)

Emerald Hills Project

In accordance with 2015 CPUs PEIR Mitigation Framework MM-GEO-1, a site-specific Preliminary Geotechnical Evaluation and Preliminary Geotechnical Evaluation Addendum were prepared for the project by GeoTek, Inc. and is included as Appendix G and Appendix H (Geotek, 2023b; Geotek, 2023a). As detailed below, the completion of and adherence to these site-specific reports, as well as the project plans prepared in accordance with local and state regulations, satisfy Mitigation Framework MM-GEO-1 and MM-GEO-2.

The Geotechnical Evaluation notes that the project site is not located in a seismically-active region, and no active fault is known to exist at the site. Additionally, the site is not situated within an Alquist-Priolo Earthquake Fault Zone or a Special Studies Zone. The nearest known active fault is located approximately 4.5 miles southwest of the project site. The project would be required to comply with the recommendations provided in the project-specific Geotechnical Evaluation.

The liquefaction potential and seismic settlement potential on the project site is considered negligible due to the apparent density of the underlying formation and lack of a shallow groundwater table. Additionally, the Geotechnical Evaluation concludes that the potential for landslides and rockfall is considered low. Furthermore, the project site would not be subject to seiches and tsunamis due to site elevation and distance from an open body of water. Therefore, the project would not expose people or structures to 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, landslides, or similar hazards. Impacts would be less than significant.

The project would implement the land uses established as part of the ENCP. Thus, the project does not entail any land use or circulation modifications. Notwithstanding, construction activities and long-term operational activities associated with the project could result in the increased potential for erosion either on- or off-site. Construction-related and operational impacts are discussed below.

Construction-Related Activities

Grading activities that would occur as part of the project would expose underlying soils, which would increase erosion susceptibility during grading activities. Exposed soils could be subject to erosion during rainfall events or high winds due to the removal of stabilizing vegetation and exposure of these erodible materials to wind and water. Erosion by water would be greatest during the first rainy season after grading (before landscaping becomes established). Erosion by wind would be highest during periods of high wind speeds. The project site topography is characterized by two broad knolls located in the northeast and southeast of the site.

Pursuant to the requirements of the State Water Resources Control Board, grading activities associated with the project and construction associated with future implementing development projects would be required to obtain a National Pollutant Discharge Elimination System (NPDES) permit for construction activities. A NPDES permit is required for all projects that include construction activities, such as clearing, grading, and/or excavation that disturb at least one acre of total land area. The City's Municipal Separate Storm Sewer System (MS4) NPDES Permit requires the project Applicant to prepare and submit to the San Diego Regional Quality Control Board (SDRQCB) for approval a project-specific Storm Water Pollution Prevention Plan (SWPPP), which would address

erosion during construction. The SWPPP must identify and implement an effective combination of erosion control and sediment control measures (i.e., Best Management Practices, or BMPs) to reduce or eliminate discharge to surface water from storm water and non-storm water discharges. Adherence to the requirements noted in the project's required site-specific SWPPP during construction activities on- and off-site would further ensure that potential erosion and sedimentation effects would be less than significant. Consistent with the findings of the 2015 CPUs PEIR, mandatory adherence to the requirements noted in the site-specific SWPPP, as would be required for the project, would ensure that potential construction-related effects associated with water erosion would be less than significant.

During grading and other construction activities involving soil exposure or the transport of earth materials, §142.0101 et seq. of the City of San Diego Municipal Code, which establishes grading regulations, also would apply (City of San Diego, 2018, § 142.0101 et seq). Furthermore, and consistent with the findings of the 2015 CPUs PEIR, the project Applicant prepared a site-specific geotechnical investigation (*Appendix G*) to identify measures needed in the long term reduce erosion at the project level. Compliance with the recommendations of the site-specific geotechnical investigation is required by the 2015 CPUs PEIR Mitigation Framework MM-GEO-2. Through project review, it is demonstrated that the project would satisfy Mitigation Framework MM-GEO-2, which requires adherence to the site-specific geotechnical investigation as well as the City's Grading Regulations and NDPES permit requirements. Potential construction-related effects associated with soil exposure and wind and water erosion would be less than significant.

Long-Term Operational Activities

Following construction of future implementing development projects, wind and water erosion on the project site would be minimized, as the project proposes urban land uses, and the areas disturbed during construction would be landscaped or covered with impervious surfaces and drainage would be controlled through a storm drain system. Furthermore, future implementing projects would be subject to compliance with the drainage and hydromodification requirements contained in the drainage study (*Appendix E1*) prepared for the project. In addition, the project's SWQMP (*Appendix I*) requires Structural Storm Water BMPs to reduce pollutants in stormwater runoff and hydromodification requirements to control runoff volumes and flow durations in accordance with the City's MS4 Permit. Compliance with these requirements would ensure that the rate of runoff from the site does not increase in comparison to existing conditions, thereby precluding the potential for increased erosion hazards downstream. Compliance with regulations satisfies the requirements of Mitigation Framework MM-GEO-1 and MM-GEO-2. Therefore, implementation of the land use and circulation modifications associated with the project would not significantly increase the risk of wind or water erosion on- or off-site in the long term, and impacts would be less than significant.

Overall, based on the foregoing analysis and information, the project is within the scope of the analysis of the PEIR and there is no evidence that the project would require a major change to the PEIR. The project would not result in any new significant impact, nor would there be a substantial increase in the severity of impacts from that described in the PEIR.

HAZARDOUS MATERIALS

2015 CPUs PEIR

The 2015 CPUs PEIR found that future development projects would result in potential impacts associated with wildfire risks. The 2015 CPUs PEIR found that projects within the ENCP would be required to implement the City's Brush Management Regulations, and Landscape Standards pursuant to GP and ENCP policies intended to reduce the risk of wildfires. Further, the 2015 CPUs PEIR noted that all future projects would be reviewed for compliance with the 2010 California Fire Code, Section 145.07 of the LDC, and Chapter 7 of the California Building Code, and would be reviewed for compliance with all City and Fire Code requirements aimed at ensuring the protection of people or structures from potential wildland fire hazards. Therefore, the 2015 CPUs PEIR found that impacts would be less than significant. (City of San Diego, 2015a, p. 5.10-29)

The 2015 CPUs PEIR found that the study areas lie within the ALUCP Review Areas 1 and 2. The 2015 CPUs PEIR found that the ENCP contains specific policies for evaluating airport land use compatibility, including consideration of ALUCP noise contours. Additionally, the 2015 CPUs PEIR found that the ENCP contains policies to restrict building intensity in certain areas per ALUCP requirements and to reduce noise. Therefore, impacts were found to be less than significant, and no mitigation was required. (City of San Diego, 2015a, p. 5.10-34)

The 2015 CPUs PEIR found that land use changes from implementation of the ENCP may result in the increased generation of hazardous materials, substances, or wastes. The 2015 CPUs PEIR found that development of the ENCP would be required to conform to City, state and federal regulations regarding the use, transportation, disposal, and accidental release of hazardous materials. The 2015 CPUs PEIR also found that the ENCP includes policies to protect the health, safety and welfare of residents relating to industrial land uses, documentation of hazardous materials investigations, and requiring soil remediation in land use changes from industrial or heavy commercial to residential or mixed residential development. Therefore, the 2015 CPUs PEIR concluded that impacts due to the release of hazardous materials or routine transport, use, or disposal of hazardous materials would be less than significant and no mitigation was required. (City of San Diego, 2015a, pp. 5.10-23 through 5.10-24)

The 2015 CPUs PEIR found that, based on the Hazardous Materials Technical Study (HMTS), prepared for the 2015 CPUs PEIR, there are no properties within the ENCP that are included in a list of hazardous materials sites compiled pursuant to Government Code Section 6596.2. The 2015 CPUs PEIR found that compliance with federal, state, and local regulations would ensure that the potential impact would be less than significant. (City of San Diego, 2015a, pp. 5.10-26 through 5.10-27)

Emerald Hills Project

Construction activities associated with the project would require the transportation and use of limited quantities hazardous materials related to construction. However, these materials are not acutely hazardous, and use of these common hazardous materials in small quantities would not represent a significant hazard to the public or the environment. The use of hazardous materials and substances during construction would be subject to federal, state, and local health and safety

regulations. Additionally, construction activities are inherently temporary in nature. As a result, hazardous material impacts related to construction activities would be less than significant.

The project includes residential land uses, which are not associated with the routine use, transport, or disposal of hazardous materials. Additionally, the project is not located in close proximity to existing or planned industrial land uses that may utilize hazardous substances. Therefore, with implementation of mandatory regulatory requirements, the project would result in less than significant impacts due to the routine transport, use, or disposal of hazardous materials, and less than significant impacts associated with reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

Additionally, the project site is not located on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. The project would not interfere with any known adopted emergency plans and would have a less-than significant impact associated with altering emergency access on the project site. In addition to its main access on 60th Street, the project proposes to build an Emergency Vehicle Access Road on the west side of the project site that would be gated and secured with lock boxes.

According to the City of San Diego's Very High Fire Hazard Severity Map, the eastern and northwestern portions of the project site are located within a Local Responsibility Area (LRA) Very High Fire Hazard Severity Zone (VHFHSZ). However, implementation of the project would not increase wildland fire risk at the site over existing conditions. The project would redevelop a site developed with a transmitter building and two broadcast towers and would not conflict with zoning or land use designations for the site. Implementation of the project would install standard fire safety features and construct buildings in compliance with the fire regulations in the California Building Code (CBC). Additionally, implementation of the project would reduce unmaintained brush areas on the project site. Therefore, the project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires.

The project site is located approximately 6.1 miles east of the San Diego Airport in the ALUCP AIA (Review Area 2). The site is not located within any ALUCP Safety Zones. The project does not include a proposed increase in height limits. The residential uses proposed comply with the regulations set forth in the San Diego International Airport ALUCP. Therefore, the project would not result in a safety hazard for people residing or working within an airport influence area.

Overall, based on the foregoing analysis and information, the project is within the scope of the analysis of the PEIR and there is no evidence that the project would require a major change to the PEIR. The project would not result in any new significant impact, nor would there be a substantial increase in the severity of impacts from that described in the PEIR.

GREENHOUSE GAS EMISSIONS

The 2015 CPUs PEIR found that implementation of the ENCP would result in a 40.3 percent reduction in GHG emissions compared to Business as Usual (BAU), which would exceed the City's threshold of a 28.3 percent reduction in GHG emissions relative to BAU. The 2015 CPUs PEIR noted that GHG reductions would be due to compliance with federal and state regulations, including the Title 24 Building Code, and ENCP policies. The 2015 CPUs PEIR concluded that impacts would be less than

significant, and no mitigation would be required. (City of San Diego, 2015a, pp. 5.11-14 through 5.11-15)

Emerald Hills Project

Construction Emissions

The 2015 CPUs PEIR's consideration of construction-related GHG emissions assumed that sources of construction-related emissions would include: a) fugitive dust from grading activities; b) construction equipment exhaust; c) construction-related trips by workers, delivery trucks, and material-hauling trucks; and d) construction-related power consumption. Based on industry-standard construction practices, these are reasonable assumptions for sources of construction activity air emissions associated with the project. As such, there would be no change in construction-related GHG emissions quantities associated with the project. Therefore, implementation of the project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the 2015 CPUs PEIR.

Operational Emissions

The project evaluated herein consists of a VTM, SDP, NDP, and NUP to develop the 31.2-acre site with 123 single-family residences. The project is consistent with the land use designations specified in the ENCP and General Plan.

Consistent with the assumptions for the project site in the 2015 CPUs PEIR, future development would generate operational-related GHG emissions. As previously noted, the project would be developed in accordance with the land use assumptions for the site. Thus, the project's land uses and emissions were included in the scope of analysis conducted for the ENCP as part of the 2015 CPUs PEIR. As noted in the 2015 CPUs PEIR, implementation of the ENCP would decrease GHG emissions relative to BAU.

In the time following the certification of the 2015 CPUs PEIR, the City of San Diego adopted the 2022 CAP Update and proposed a more detailed draft CAP Implementation Plan (February 2023).

For purposes of analysis herein, the significance threshold related to "conflicting with an applicable plan, policy, or regulation adopted for the purpose of reducing the emission of GHGs" is based on the City's approved 2022 CAP, which is the methodology now used by the City in order to provide a consistent, localized, and comprehensive approach for the assessment of GHG impacts (City's CEQA Significance Determination Thresholds; City of San Diego 2022). Thus, the City's CAP is the applicable plan for reducing GHG emissions in the City of San Diego. Projects that are consistent with the CAP are able to conclude that the project would have less than significant cumulatively considerable GHG emissions impacts under CEQA.

Compliance with the CAP is determined through land use consistency and project compliance with the regulations set forth in SDMC Chapter 14, Article 3, Division 14. The first step in determining CAP consistency is to assess the project's consistency with the growth projections used in the development of the CAP. Since the project would be consistent with the existing land use plan and zoning designations included as part of the General Plan and ENCP, the project would be consistent with the CAP. The second step in demonstrating CAP consistency is a review to ensure consistency with the regulations set forth in SDMC Chapter 14, Article 3, Division 14. In compliance with the CAP,

the project would include eight street trees that provide at least 50% shade over the pedestrian walkway and three benches along the project frontage with 60th Street. In total, the project would provide 35 street trees along 60th Street and 205 street trees along the project's interior streets, as well as 163 slope trees and 55 open space trees. The project would also provide a 200-square foot resting area and on-site bicycle repair station to support alternative mobility options. Therefore, the project complies with the CAP Regulations adopted in 2022 as part of the City's CAP Update. Because the City's CAP was prepared in compliance with CEQA Section 15183.5 and is intended to achieve the City of San Diego's share of Statewide GHG reduction targets, the project's demonstrated compliance with the CAP indicates that a less-than-significant GHG impact would occur related to compliance with planning policies and regulations. No new impact would occur in comparison to the GHG analysis presented in the 2015 CPUs PEIR.

Overall, based on the foregoing analysis and information, the project is within the scope of the analysis of the PEIR and there is no evidence that the project would require a major change to the PEIR. The project would not result in any new significant impact, nor would there be a substantial increase in the severity of impacts from that described in the PEIR.

ENERGY

2015 CPUs PEIR

The 2015 CPUs PEIR found that buildout under the ENCP would result in an increased demand for electric power; however, the increased demand would not be anticipated to result in a need for new electrical systems or require substantial alteration of existing utilities, which would create physical impacts. The 2015 CPUs PEIR noted that future projects would be required to comply with Title 24 Building Energy Standards of the California Public Resources Code, as well as the ENCP Urban Design Element, which contains a list of Climate Change and Sustainable Development Policies. Therefore, the 2015 CPUs PEIR concluded that a combination of planned sustainable building techniques and energy efficiency practices would result in a decrease in energy consumed for the operation of new buildings within the ENCP, and impacts would be less than significant. (City of San Diego, 2015a, pp. pp. 5.12-6 through 5.12-10)

The 2015 CPUs PEIR found that grading and construction activities would consume energy through the operation of heavy off-road equipment, trucks and worker traffic on the project level. The 2015 CPUs PEIR also noted that construction equipment used for future development and redevelopment projects is anticipated to be more efficient as engines are replaced, exhaust systems are retrofitted, and older equipment is retired and new equipment meeting more stringent emission standards is put into service and would further reduce emissions. The 2015 CPUs PEIR identified policies in the ENCP Mobility Element that would reduce fuel consumption, and impacts were found to be less than significant with no mitigation required. (City of San Diego, 2015a, pp. pp. 5.12-12 through 5.12-13)

Emerald Hills Project

The project would be required to meet mandatory energy standards of the current California energy code. Energy used for construction would primarily consist of diesel and gasoline consumed by construction equipment and would include construction worker commutes and the transportation of construction materials. Due to the temporary nature of construction and the financial incentives

for developers and contractors to use energy-consuming resources in an efficient manner, the construction phase of the project would not result in wasteful, inefficient, and unnecessary consumption of energy. Impacts due to wasteful, inefficient, or unnecessary consumption of energy resources during construction would be less than significant.

Operation of the project would consume energy as part of building operations and transportation activities. Building operations would involve energy consumption for multiple purposes including, but not limited to, building heating and cooling, refrigeration, lighting, and electronics. The project would be designed and constructed in accordance with the City's latest adopted energy efficiency standards, which are based on the California Title 24 energy efficiency standards. Operational energy would also be consumed during vehicle trips associated the future residential uses. Fuel consumption would be primarily related to vehicle use by residents and visitors associated with the project. The project is located on an infill site that is surrounded by existing urban uses. The existing transportation facilities and infrastructure would provide future residents associated with the project access to a mix of land uses in close proximity, thus further reducing fuel consumption demand. Additionally, the project would provide electric vehicle (EV) infrastructure that would further promote fuel efficient vehicles. Therefore, operational-related transportation fuel consumption would not result in a significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources. Impacts would be less than significant.

Overall, based on the foregoing analysis and information, the project is within the scope of the analysis of the PEIR and there is no evidence that the project would require a major change to the PEIR. The project would not result in any new significant impact, nor would there be a substantial increase in the severity of impacts from that described in the PEIR.

PUBLIC SERVICES AND FACILITIES

2015 CPUs PEIR

The 2015 CPUs PEIR found that the population increase due to implementation of the ENCP would generate greater demand for public facilities and services, including police, fire, libraries, schools, and maintenance of public facilities. The 2015 CPUs PEIR noted that future projects would be subject to fees to fund potential future development for additional police, fire resources, and schools. The ENCP also noted that future subjects would be subject to ENCP policies regarding public facilities, including parks and libraries. The 2015 CPUs PEIR concluded that impacts would be less than significant, and mitigation was not required. (City of San Diego, 2015a, pp. 5.13-20 through 5.13-30)

Emerald Hills Project

The project would result in the development of 123 single-family residences, which would result in approximately 447 additional residents (3.63 persons per household x 123 residences = 446.5 residents). The project would be consistent with the land uses noted within the ENCP and General Plan. The project would increase demand for all public facilities and that increase in demand was anticipated in the 2015 CPUs PEIR. (SANDAG, 2020)

The closest fire station to the project site is Station 26, located approximately one mile north of the site at 2850 54th Street, San Diego, CA 92105. The existing fire facilities would continue to be

adequate to serve the project site, and implementation of the project would not require the construction of new or expanded facilities. Further, there is currently no known plan or submitted application to build or alter fire facilities, and without specific development plans, it would be too speculative for evaluation of physical impacts pursuant to CEQA Guidelines Section 15145. As identified in the 2015 CPUs PEIR, future fire facility improvements would be subject to separate environmental review at the time design plans are available. Thus, impacts to fire protection would be less than significant.

While the project would result in an increase in demand for police services, the increase was analyzed in the 2015 CPUs PEIR. The existing police facilities would continue to be adequate to serve the project site, and implementation of the project would not require the construction of new or expanded facilities. Further, there is currently no known plan or submitted application to build or alter police facilities, and without specific development plans, it would be too speculative for evaluation of physical impacts pursuant to CEQA Guidelines Section 15145. As identified in the 2015 CPUs PEIR, future police facility improvements would be subject to separate environmental review at the time design plans are available. Therefore, impacts to police protection would be less than significant.

Based on the student generation rates included in the 2015 CPUs PEIR, the project would result in approximately 87 additional students. This increase in student population was accounted for in the 2015 CPUs PEIR, and the project would not lead to an increase in students greater than what was already analyzed. Additionally, the project would be subject to development impact fees and ENCP policies to support educational opportunities. Furthermore, the construction and operation of new public facilities would be subject to separate environmental review; as such plans are not currently available, it would be speculative to determine impacts associated with the expansion or construction of additional school facilities. Therefore, impacts to schools would be less than significant.

Overall, based on the foregoing analysis and information, the project is within the scope of the analysis of the PEIR and there is no evidence that the project would require a major change to the PEIR. The project would not result in any new significant impact, nor would there be a substantial increase in the severity of impacts from that described in the PEIR.

PUBLIC UTILITIES

2015 CPUs PEIR

The 2015 CPUs PEIR found that implementation of the ENCP would result in additional population growth and additional demand for natural gas, water, sewer, communication systems and solid waste management. The 2015 CPUs PEIR found that, with compliance of applicable regulations and ENCP policies, impacts to existing utilities would be less than significant and no mitigation would be required. (City of San Diego, 2015a, pp. 5.14-20 through 5.14-35)

The 2015 CPUs PEIR noted that the ENCP area is located in the City of San Diego Public Utilities Department (PUD) service area and found that, based on the Water Supply Assessment (WSA) completed for the ENCP area, sufficient water supplies are available during normal, single-dry year, and multiple-dry years. Additionally, the 2015 CPUs PEIR found that there is sufficient water supply

to serve existing and projected demands of the Project area, as well as future water demands in normal and dry year forecasts during a 20-year projection. As such, the 2015 CPUs PEIR concluded that impacts related to water supply would be less than significant. (City of San Diego, 2015a, p. 5.14-40)

Emerald Hills Project

The project site is located within the PUD service area. A Water Service Analysis was completed for the project by Dexter Wilson Engineering *(Appendix E3)*. The Water Service Analysis determined that the project would result in a water demand rate of 525 gpd per dwelling unit, or a total of 64,575 gpd, which would be consistent with the findings of the 2015 CPUs PEIR. To provide water service to the site, an 8-inch water line would be constructed in 60th Street that would connect to existing utility lines. Therefore, implementation of the project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the 2015 CPUs PEIR.

The City of San Diego would provide sanitary sewer service for the project site. The project proposes a connection to the existing 8-inch sewer line in Old Memory Lane and the 8-inch sewer line in 60th Street. As noted in the project's Sewer Study (*Appendix E2*), the project would result in an average sewage flow of 34,440 gpd, which is within the assumptions of 2015 CPUs PEIR. The Sewer Study noted that peak sewer line dry weather flow would exceed the City design criteria. Further review was completed by City staff and determined the exceedance would not the City's sewer system. Impacts to sanitary sewer service would not result in any new impacts or increase the severity of a previously identified impact, as previously analyzed in the 2015 CPUs PEIR.

A project-specific Waste Management Plan (WMP) (*Appendix J*) was prepared by T&B Planning, Inc., and the project would be required to implement the recommendations of the WMP. Demolition waste associated with the project would generate approximately 16,000 cy of waste during the demolition phase, 523.1 tons of building construction waste, and 1,750.9 tons of operational waste per year. With the implementation of the WMP, the project would not result in any new impacts or increase the severity of a previously identified significant impact. Furthermore, the project would be required to comply with the City's Municipal Code (including the Refuse, Organic Waste, and Recyclable Materials Storage Regulations (Municipal Code Chapter 14, Article 2, Division 8), Recycling Ordinance (Municipal Code Chapter 6, Article 6, Division 7), and the Construction and Demolition (C&D) Debris Deposit Ordinance (Municipal Code Chapter 6, Article 6, Division 6) for diversion of both construction waste during the demolition phase and solid waste during the long-term, operational phase.

Under existing conditions, there are minimal drainage improvements within the project site boundary. On-site drainage improvements would include three on-site water quality/hydromodification basins with a storm drain system to safely convey runoff through the site to the biofiltration basins to address water quality, hydromodification and peak flow mitigation before discharging into the existing drainage system, similar to the existing conditions. In the proposed conditions, the site consists of three drainage areas. Each of these areas will have its runoff collected by the proposed storm drain inlets and subsequently routed through the on-site storm drain system, leading to its associated biofiltration basin. In the proposed conditions, the flow pattern would remain similar, and the flows from the developed project site area would connect to the same existing off-site storm drainage network.

Development on the site as called for under the ENCP and the project would increase impervious surfaces, resulting in the potential for greater surface runoff and increased demands on existing storm water systems within the ENCP area as compared to the existing condition. With the implementation of the project, runoff from the site would be collected via inlets, pipes, brow ditches, roof drains, and biofiltration basins. Project flows would be conveyed via on-site storm drain infrastructure to Chollas Creek.

Construction of on-site drainage facilities is inherent to the construction phase of the project and impacts due to construction have been evaluated herein and in the 2015 CPUs PEIR. There would be no environmental impacts associated with the project's proposed drainage infrastructure that have not already been addressed. Additionally, the project is required to comply with ENCP Policies to ensure that impacts due to the installation of storm water infrastructure would be reduced to below a level of significance. Furthermore, because the project meets City of San Diego requirements for on-site drainage facilities, the project would not result in or require expansion of off-site drainage facilities except as may be needed for off-site roadway construction. Accordingly, and consistent with the findings of the 2015 CPUs PEIR, impacts associated with storm water facilities would be less than significant.

Overall, based on the foregoing analysis and information, the project is within the scope of the analysis of the PEIR and there is no evidence that the project would require a major change to the PEIR. The project would not result in any new significant impact, nor would there be a substantial increase in the severity of impacts from that described in the PEIR.

VISUAL EFFECTS AND NEIGHBORHOOD CHARACTER

2015 CPUs PEIR

The 2015 CPUs PEIR found that ENCP would not result in a substantial alteration to the visual quality of the area. No scenic vistas or viewing areas were identified by the ENCP or the City's General Plan for the ENCP area. The PEIR found that new development in the ENCP area would take place on infill sites and would not substantially alter the visual character. The PEIR found that the ENCP contains policies that focus on ensuring the compatibility of future development with the area's characteristic landform, which includes steep slopes and hilly areas, and Chollas Creek. The PEIR noted that all future developments in the ENCP area would be subject to the LDC and ESL regulations. In addition, the PEIR found that the ENCP identified gateways and community anchors to known resources. As such, the PEIR concluded that impacts to the visual quality of the area, particularly with respect to views from public viewing areas, vistas, or open spaces, would be less than significant. (City of San Diego, 2015a, pp. 5.15-23 through 5.15-45)

The 2015 CPUs PEIR found that there are no State-designated scenic highways in the ENCP area. Additionally, the 2015 CPUs PEIR did not identify notable rock outcroppings and/or historic buildings. The 2015 CPUs PEIR identified visual assets in the ENCP area, including parks, open space areas, cemeteries, creeks, and canyons. The 2015 CPUs PEIR found that mandatory compliance with applicable regulatory requirements that implement the goals and policies of the General Plan and ENCP would ensure that impacts to the visual character and quality of the ENCP area would be less than significant. Additionally, the 2015 CPUs PEIR noted that much of the ENCP area is already developed, and any new development or redevelopment would be expected to take place on infill

sites. Impacts were concluded to be less than significant, requiring no mitigation. (City of San Diego, 2015a, pp. 5.15-23 through 5.15-45)

The 2015 CPUs PEIR found that the ENCP land use designations maintain consistency with existing or surrounding development. The 2015 CPUs PEIR noted that the ENCP would not alter height or bulk requirements within the Community Plan Area. Additionally, the 2015 CPUs PEIR found that the ENCP contains policies that focus on ensuring the compatibility of future development with the areas characteristic landform. Further, the policies included as part of the ENCP are intended to prevent or reduce potential impacts on character that may arise from changes in land uses and focus on enhancing the existing character of neighborhoods. Impacts were found to be less than significant, and no mitigation was required. (City of San Diego, 2015a, pp. 5.15-23 through 5.15-45)

The 2015 CPUs PEIR found that existing undeveloped parcels throughout the Encanto Neighborhoods CPA would transition to a more urbanized, cohesive land use arrangement. The 2015 CPUs PEIR noted that specific grading quantities associated with future development were unknown; however, the 2015 CPUs PEIR found that the ENCP contained policies that address potential development challenges related to the steeply sloped and hilly character of the of the Encanto Neighborhoods Community Plan Area. Additionally, the 2015 CPUs PEIR noted that all future projects within the ENCP would be subject to the Land Development Code, hillside regulations, and other Environmentally Sensitive Lands Regulations prior to development. The 2015 CPUs PEIR found that mandatory compliance with applicable regulatory requirements and policies would ensure that impacts associated to natural topography would be less than significant. (City of San Diego, 2015a, p. 5.15-43)

The 2015 CPUs PEIR found that future development would be required to comply with the City's Grading Regulations, General Plan policies, and ENCP policies. As such, the 2015 CPUs PEIR concluded that impacts associated with the modification of unique physical features that would create a negative visual appearance would be less than significant. (City of San Diego, 2015a, p. 5.15-43)

Emerald Hills Project

The project consists of a VTM, SDP for environmentally sensitive lands, NDP, and NUP for the development of 123 residential units on a 31.2-acre site. The project would be consistent with all applicable design standards and policies, including standards and policies related to open space connections and view corridors, architectural design, and landscape design.

The project is not located in an area designated as a scenic vista or viewshed by either the City of San Diego General Plan or the ENCP. The project site is surrounded by residential uses. The building heights proposed by the project would not result in the obstruction of public views. Therefore, the project would not result in a substantial obstruction of a vista or scenic view from a public viewing area. No impact to the visual quality of the area would occur.

Under existing conditions, and consistent with conditions that existed at the time the 2015 CPUs PEIR was certified, the site is contains a 7,050 square foot transmitter building and two broadcast towers. Land uses surrounding the project site include residential and open space land uses to the north, residential land uses to the east, residential and open space land uses to the south, and residential and open space land uses to the west. (Google Earth, 2024).

Regarding visual quality and character, the land uses proposed by the project would be in accordance with the land uses envisioned by the ENCP. Furthermore, the ENCP contains design frameworks that would help ensure that the project area is developed in a manner that would not degrade the aesthetic character of the site or its surroundings.

Under existing conditions, the project site is characterized by relatively flat terrain, ranging from 310 feet above mean sea level (amsl) in the western portion of the site to 404 feet amsl in the northwestern portion of the site. The project would include grading of 30.2 acres of the 31.18-acre site. The project generally would maintain the site's existing topography and grading would be balanced on-site, requiring 176,400 cubic yards (cy) of cut and 176,400 (cy) of fill. The project would include fill slopes with a maximum height of 31 feet at a 2:1 slope ratio and cut slopes with a maximum height of 33 feet with a 2:1 slope ratio. While the project could have the potential to result in a significant change to natural topography or other ground surface relief features, the project would be required to comply with the applicable grading ordinances of the City of San Diego, the California Building Code (CBC), and ESL Guidelines. Furthermore, in accordance with the ENCP Policy P-CS-16, the project would be required to minimize grading related to the topography and natural features of the site. Furthermore, slopes proposed as part of the project were evaluated as part of a site-specific Preliminary Geotechnical Evaluation, included as *Appendix G* to this document. The Preliminary Geotechnical Evaluation evaluates the proposed grading plan and incorporates measures to address slope stability. The project would be required to comply with the recommendations of the Preliminary Geotechnical Evaluation (*Appendix G*). Thus, and consistent with the conclusion reached in the 2015 CPUs PEIR, the project would not result in a substantial change to natural topography or other ground surface relief features, and impacts would be less than significant. Therefore, implementation of the project would not result in any new impacts or increase the severity of a previously identified significant impact.

Slope analysis of the site determined that there are no steep hillsides on site (Vesting Tentative Map, Grading and Drainage Plan Sheet C5; Hunsaker & Associates 2024c). Due to the cut and fill slopes proposed, grading activities on the site would have the potential to result in a negative visual appearance due to the loss, covering, or modification of natural canyon or hillside slopes in excess of 25 percent gradient. However, there are no significant slopes located on the project site. Additionally, grading proposed by the project would be subject to mandatory compliance with applicable regulations as ensured through the City's NDP review process. Therefore, impacts would be less than significant.

The project would be required to comply with the City of San Diego Municipal Code, which includes light pollution reduction regulations. Additionally, the project would comply with applicable regulatory requirements that implement General Plan goals and policies related to lighting and views in the area. The development application has been reviewed for compliance with the General Plan as well as the policies contained in the ENCP. Therefore, the project would not create light or glare, which would adversely affect daytime and nighttime views in the area.

Overall, based on the foregoing analysis and information, the project is within the scope of the analysis of the PEIR and there is no evidence that the project would require a major change to the PEIR. The project would not result in any new significant impact, nor would there be a substantial increase in the severity of impacts from that described in the PEIR.

VI. ISSUES NOT ANALYZED IN THE PREVIOUS PEIR CEQA

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 the PEIR. The certified PEIR provided a similar level of analysis, even for those issue areas considered to result in impacts found not to be significant. Revisions to the project components evaluated under the PEIR are proposed with the current project. Through the environmental analysis conducted, the City has determined that the current project, subject of and evaluated under this Addendum, would not have the potential to cause significant impacts to those issue areas beyond those analyzed. While these issues were not analyzed in detail, as outlined in CEQA Section 15128, there is no new information available that would indicate that these issues would result in new significant impacts.

VII. SIGNIFICANT UNMITIGATED IMPACTS

The Southeastern San Diego and Encanto Neighborhoods Community Plan Updates Project PEIR No. 386029/SCH No. 2014051075 indicated that direct significant impacts to the following issues would be substantially lessened or avoided if all the proposed mitigation measures recommended in the PEIR were implemented: land use, biological resources, hydrology and water quality, historical resources, paleontological resources, and geology and seismic hazards. The PEIR concluded that significant impacts related to transportation, air quality, and noise would not be fully mitigated to below a level of significance. 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 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 previous certified PEIR, new CEQA Findings and or Statement of Overriding Considerations are not required.

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

VIII. MITIGATION, MONITORING AND REPORTING PROGRAM INCORPORATED INTO THE PROJECT

The project shall be required to comply with applicable mitigation measures outlined within the MMRP of the previously certified PEIR (PRJ No. 1107880/SCH No. 2014051075) and the project-specific subsequent technical studies. The following MMRP identifies measures that specifically apply to this project.

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

1. Prior to the issuance of any construction permits, such as Demolition, Grading or Building, or beginning any construction-related activity on-site, the Development Services Department (DSD) Environmental Designee (ED) shall review and approve Construction Documents (CD), (plans, specification, details, etc.) to ensure the applicable MMRP requirements are incorporated into the design and/or construction documents.

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

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

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

5. **SURETY AND COST RECOVERY –** The Development Services Director or City Manager may require appropriate surety instruments or bonds from private Permit Holders to ensure the long-term performance or implementation of required mitigation measures or programs. The City is authorized to recover its cost to offset the salary, overhead, and expenses for City personnel and programs to monitor qualifying projects.

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

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

Qualified biological monitor
Qualified paleontological monitor

Note: If all responsible Permit Holders' representatives and consultants fail to attend, an additional meeting with all parties present will be required.

CONTACT INFORMATION:

a) The PRIMARY POINT OF CONTACT is the **RE** at the **Field Engineering Division** and can be reached at **(858) 627-3200**

b) For Clarification of ENVIRONMENTAL REQUIREMENTS, contact the **RE and MMC at (858) 627-3360**

2. **MMRP COMPLIANCE:** This project, PRJ-1107880 and/or Environmental Document PRJ-1107880, shall conform to the mitigation requirements contained in the associated Environmental Document and implemented to the satisfaction of the DSD's Environmental Designee (MMC) and the City Engineer (RE). The requirements may not be reduced or changed but may be annotated (i.e., to explain when and how compliance is being met and location of verifying proof, etc.). Additional clarifying information may also be added to other relevant plan sheets and/or specifications as appropriate (i.e., specific locations, times of monitoring, methodology, etc.

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

3. **OTHER AGENCY REQUIREMENTS:** Evidence of compliance with all other agency requirements or permits shall be submitted to the RE and MMC for review and acceptance prior to the beginning of work or within one week of the Permit Holder obtaining documentation of those permits or requirements. Evidence shall include copies of permits, letters of resolution, or other documentation issued by the responsible agency:

Not Applicable

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

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

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

Project-Specific Document Submittal/Inspection Checklist

Issue Area	Document Submittal	Associated Inspection/Approvals/Notes
General (Biological Resources and Paleontological Resources)	Consultant Qualification Letters	Prior to Preconstruction Meeting
General (Biological Resources and Paleontological Resources)	Consultant Construction Monitoring Exhibits	Prior to or at Preconstruction Meeting
Biological Resources	Dedication of Land or Covenant of Easement	Prior to the issuance of any construction permit
Biological Resources	Nest Survey Letter Report (if grading/construction is to occur between January 15 to September 15)	Three calendar days prior to activities
Paleontological Resources	Paleontology Reports	Paleontology Site Observation
General	Consultant Site Visit Record (CSVR)	Monitoring during grading (as applicable)
Bond Release	Request for Bond Release Letter	Final MMRP Inspections Prior to Bond Release Letter

C. SPECIFIC MMRP ISSUE AREA CONDITIONS/REQUIREMENTS

In order to avoid potential impacts to Biological Resources and Paleontological Resources, the following mitigation measures shall be implemented by the permit holder:

BIOLOGICAL RESOURCES

MM-BIO-1 **BIOLOGICAL RESOURCES (RESOURCE PROTECTION DURING CONSTRUCTION)**

I. Prior to Construction

A. **Biologist Verification** – The owner/permittee shall provide a letter to the City's Mitigation Monitoring Coordination (MMC) section stating that a Project Biologist (Qualified Biologist), as defined in the City of San Diego's Biological Guidelines (2018), has been retained to implement the project's biological monitoring program. The letter shall include the names and contact information of all persons involved in the biological monitoring of the project.

B. **Pre-construction Meeting** – The Qualified Biologist shall attend the pre-construction meeting, discuss the project's biological monitoring program, and arrange to perform any follow-up mitigation measures and reporting, including

site-specific monitoring, restoration or revegetation, and additional fauna/flora surveys/salvage.

C. **Biological Documents** – The Qualified Biologist shall submit all required documentation to MMC verifying that any special mitigation reports, including but not limited to, maps, plans, surveys, survey timelines, or buffers, are completed or scheduled per City Biology Guidelines, Multiple Species Conservation Program (MSCP), Environmentally Sensitive Lands Ordinance (ESL), project permit conditions; California Environmental Quality Act (CEQA); endangered species acts (ESAs); and/or other local, state or federal requirements.

D. **BCME** – The Qualified Biologist shall present a Biological Construction Mitigation/Monitoring Exhibit (BCME), which includes the biological documents in C above. In addition, include any: restoration/revegetation plans, plant salvage/relocation requirements (e.g., coastal cactus wren plant salvage, burrowing owl exclusions, etc.), avian or other wildlife surveys/survey schedules (including general avian nesting and USFWS protocol), timing of surveys, wetland buffers, avian construction avoidance areas/noise buffers/ barriers, other impact avoidance areas, and any subsequent requirements determined by the Qualified Biologist and the City ADD/MMC. The BCME shall include a site plan, a written and graphic depiction of the project's biological mitigation/monitoring program, and a schedule. The BCME shall be approved by MMC and referenced in the construction documents.

E. **General Avian Protection Requirements** –To avoid any direct impacts to Cooper's hawk, removal of habitat that supports active nests in the proposed area of disturbance should occur outside of the breeding season for these species (January 15 to September 15). If the removal of habitat in the proposed area of disturbance must occur during the breeding season, the Qualified Biologist shall conduct a pre-construction survey to determine the presence or absence of nesting birds in the proposed area of disturbance. The pre-construction survey shall be conducted within three calendar days before the start of construction activities (including removal of vegetation). The applicant shall submit the results of the pre-construction survey to the City DSD MMC/MSCP for review and approval before initiating any construction activities. If nesting birds are detected, a letter report in conformance with the City's Biology Guidelines and applicable State and Federal Laws (i.e., appropriate follow-up surveys, monitoring schedules, construction, and noise barriers/buffers, etc.) shall be prepared and include proposed measures to be implemented to ensure that take of birds or eggs or disturbance of breeding activities is avoided. The report shall be submitted to the City DSD MMC/MSCP for review and approval and implemented to the satisfaction of the City. The City's DSD MMC Section and Biologist shall verify and approve that all measures identified in the report or mitigation plan are in place before and/or during construction.

F. **Resource Delineation** – Prior to construction activities, the Qualified Biologist shall supervise the placement of orange construction fencing or equivalent along the limits of disturbance adjacent to sensitive biological habitats and verify compliance with any other project conditions as shown on the BCME. This phase shall include flagging plant specimens and delimiting buffers to protect sensitive biological resources (e.g., habitats/flora and fauna species, including nesting birds) during construction. Appropriate steps/care should be taken to minimize the attraction of nest predators to the site.

G. **Education** – Prior to commencement of construction activities, the Qualified Biologist shall meet with the owner/permittee or designee and the construction crew and conduct an on-site educational session regarding the need to avoid impacts outside of the approved construction area and to protect sensitive flora and fauna (e.g., explain the avian and wetland buffers, flag system for removal of invasive species or retention of sensitive plants, and clarify acceptable access routes/methods and staging areas, etc.).

II. During Construction

A. **Monitoring** – All construction (including access/staging areas) shall be restricted to areas previously identified, proposed for development/staging, or previously disturbed as shown on "Exhibit A" and/or the BCME. The Qualified Biologist shall monitor construction activities as needed to ensure that construction activities do not encroach into biologically sensitive areas, or cause other similar damage, and that the work plan has been amended to accommodate any sensitive species located during the pre-construction surveys. In addition, the Qualified Biologist shall document field activity via the Consultant Site Visit Record (CSVR). The CSVR shall be emailed to MMC on the first day of monitoring, the first week of each month, the last day of monitoring, and immediately in the case of any undocumented condition or discovery.

B. **Subsequent Resource Identification** – The Qualified Biologist shall note/act to prevent any new disturbances to habitat, flora, and/or fauna onsite (e.g., flag plant specimens for avoidance during access, etc.). If active nests or other previously unknown sensitive resources are detected, all project activities that directly impact the resource shall be delayed until species-specific local, state, or federal regulations have been determined and applied by the Qualified Biologist.

III. Post Construction Measures

A. In the event that impacts exceed previously allowed amounts, additional impacts shall be mitigated in accordance with City Biology Guidelines, ESL and MSCP, State CEQA, and other applicable local, state, and federal laws. The Qualified Biologist shall submit a final BCME/report to the satisfaction of the City MMC within 30 days of construction completion.

MM-BIO-2 **Compensatory Mitigation:** Prior to the issuance of any construction permits, such as demolition, grading or building, or beginning any construction-related activity on-site, the owner/permittee shall provide compensatory habitat mitigation in accordance with the Biology Guidelines for impacts to 0.4 acre of Diegan coastal sage scrub (Tier II) outside of the MHPA and 29.2 acres of non-native grassland (Tier IIIB) outside of the MHPA. Mitigation shall take place via the Poway Unified School District parcel (Assessor's Parcel Number 366-040-32-00) in the East Elliot area, and/or an alternate site approved by the City. If provided in the MHPA via the Poway Unified School District parcel, the mitigation shall consist of at least 0.4 acre of Tier II habitat (or higher Tier) and 14.6 acres of Tier IIIB habitat (or higher Tier).

Prior to the issuance of construction or grading permits, the mitigation land shall either be dedicated to the City in fee title or protected by a recorded covenant of easement in accordance with the Biology Guidelines. Upon acceptance of the property, the City shall manage it in accordance with the MSCP Framework Management Plan as modified by the area-specific management directives and the Vernal Pool Management and Monitoring Plan, as appropriate.

PALEONTOLOGICAL RESOURCES

MM-PALEO-1

I. Prior to Permit Issuance

A. Entitlements Plan Check

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

B. Letters of Qualification have been submitted to ADD

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

II. Prior to Start of Construction

A. Verification of Records Search

1. The PI shall provide verification to MMC that a site specific records search has been completed. Verification includes, but is not limited to a copy of a confirmation letter from San Diego Natural History Museum, other institution or, if the search was in-house, a letter of verification from the PI stating that the search was completed.

2. The letter shall introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities.

B. PI Shall Attend Pre-construction (Precon) Meetings
   1. Prior to beginning any work that requires monitoring; the Applicant shall arrange a Precon Meeting that shall include the PI, Construction Manager (CM) and/or Grading Contractor, Resident Engineer (RE), Building Inspector (BI), if appropriate, and MMC. The qualified paleontologist shall attend any grading/excavation related Precon Meetings to make comments and/or suggestions concerning the Paleontological Monitoring program with the Construction Manager and/or Grading Contractor.
      a. If the PI is unable to attend the Precon Meeting, the Applicant shall schedule a focused Precon Meeting with MMC, the PI, RE, CM or BI, if appropriate, prior to the start of any work that requires monitoring.
   2. Identify Areas to be Monitored
      a. Prior to the start of any work that requires monitoring, the PI shall submit a Paleontological Monitoring Exhibit (PME) based on the appropriate construction documents (reduced to 11x17) to MMC identifying the areas to be monitored including the delineation of grading/excavation limits. The PME shall be based on the results of a site specific records search as well as information regarding existing known soil conditions (native or formation).
   3. When Monitoring Will Occur
      a. Prior to the start of any work, the PI shall also submit a construction schedule to MMC through the RE indicating when and where monitoring will occur.
      b. The PI may submit a detailed letter to MMC prior to the start of work or during construction requesting a modification to the monitoring program. This request shall be based on relevant information such as review of final construction documents which indicate conditions such as depth of excavation and/or site graded to bedrock, presence or absence of fossil resources, etc., which may reduce or increase the potential for resources to be present.

III. During Construction

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

of monitoring, monthly (**Notification of Monitoring Completion**), and in the case of ANY discoveries. The RE shall forward copies to MMC.

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

C. Determination of Significance
   1. The PI shall evaluate the significance of the resource.
      a. The PI shall immediately notify MMC by phone to discuss significance determination and shall also submit a letter to MMC indicating whether additional mitigation is required. The determination of significance for fossil discoveries shall be at the discretion of the PI.
      b. If the resource is significant, the PI shall submit a Paleontological Recovery Program (PRP) and obtain written approval from MMC. Impacts to significant resources must be mitigated before ground disturbing activities in the area of discovery will be allowed to resume.
      c. If resource is not significant (e.g., small pieces of broken common shell fragments or other scattered common fossils) the PI shall notify the RE, or BI as appropriate, that a non-significant discovery has been made. The Paleontologist shall continue to monitor the area without notification to MMC unless a significant resource is encountered.
      d. The PI shall submit a letter to MMC indicating that fossil resources will be collected, curated, and documented in the Final Monitoring Report. The letter shall also indicate that no further work is required.

IV. Night and/or Weekend Work

A. If night and/or weekend work is included in the contract
   1. When night and/or weekend work is included in the contract package, the extent and timing shall be presented and discussed at the precon meeting.
   2. The following procedures shall be followed.
      a. No Discoveries
         In the event that no discoveries were encountered during night and/or weekend work, The PI shall record the information on the CSVR and submit to MMC via fax by 8AM on the next business day.
      b. Discoveries
         All discoveries shall be processed and documented using the existing procedures detailed in Sections III - During Construction.
      c. Potentially Significant Discoveries
         If the PI determines that a potentially significant discovery has been made, the procedures detailed under Section III - During Construction shall be followed.

d. The PI shall immediately contact MMC, or by 8AM on the next business day to report and discuss the findings as indicated in Section III-B, unless other specific arrangements have been made.

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

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

V. Post Construction

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

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

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

D. Final Monitoring Report(s)
   1. The PI shall submit two copies of the Final Monitoring Report to MMC (even if negative), within 90 days after notification from MMC that the draft report has been approved.

2. The RE shall, in no case, issue the Notice of Completion until receiving a copy of the approved Final Monitoring Report from MMC which includes the Acceptance Verification from the curation institution.

IX. CERTIFICATION

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

Dawna Marshall
Senior Planner
Development Services Department

11/13/2025
Date of Final Report

Analyst: Morgan Dresser

Attachments:

Figure 1 - Vesting Tentative Map No. 3262907
Figure 2 - Aerial Photograph
Figure 3 - Vicinity Map
Figure 4 - Regional Map
Figure 5 - Transportation Study Area
Southeastern San Diego Community Plan and the Encanto 2015 CPUs PEIR

Appendices:

A	Biological Technical Report
B	Historical Resources Technical Report
C1	Local Mobility Analysis
C2	Vehicle Miles Traveled Analysis
D	Noise Impact Analysis
E1	Drainage Study
E2	Sewer Study
E3	Water Service Analysis
F	Phase I Cultural Resources Survey
G	Preliminary Geotechnical Evaluation
H	Preliminary Geotechnical Evaluation Addendum
I	Storm Water Quality Management Plan
J	Preliminary Waste Management Plan
K1	Air Quality Impact Analysis
K2	Construction Health Risk Assessment

IX. REFERENCES

The following documents were referenced as information sources during the preparation of this document.

Cited As:	Source:
(BFSA, 2024a)	BFSA Environmental Services. 2024 *Historic Resource Technical Report.* January 31, 2024; Revised March 19, 2024.
(BFSA, 2024b)	BFSA Environmental Services. 2024. *Phose I Cultural Resource Survey.* November 6, 2023; Revised January 31, 2024.
(City of San Diego, 2015a)	City of San Diego. 2015. *Southeastern San Diego and Encanto Neighborhoods PEIR.* October 2015.
(City of San Diego, 2015b)	City of San Diego. 2015. *Encanto Neighborhoods Community Plan.* November 16, 2015.
(City of San Diego, 2015c)	Southeastern San Diego and Encanto Neighborhoods Community Plan Updates Project Final Program Environmental Impact Report. October 2015. The document is available at https://www.sandiego.gov/ceqa/final.
(City of San Diego, 2018)	City of San Diego. 2018. *City of San Diego Municipal Code, Chapter 14.* Retrieved from http://docs.sandiego.gov/municode/MuniCodeChapter14/Ch14Art02Division01.pdf
(City of San Diego, 2020)	City of San Diego. 2020. Final Program Environmental Impact Report for Complete Communities: Housing Solutions and Mobility Choices, San Diego, California. May. Available at: https://www.sandiego.gov/sites/default/files/final_peir_for_complete_communities_housing_solutions_and_mobility_choices.pdf.
(City of San Diego, 2022)	City of San Diego. 2022. *Transportation Study Manual.* September 19, 2022.
(Dexter Wilson, 2023)	Dexter Wilson Engineering, Inc. 2023. *Sewer Study for the Emerald Hills Project.* November 13, 2023.
(Dexter Wilson, 2024)	Dexter Wilson Engineering, Inc. 2024. *Water Service Analysis for the Emerald Hills Project.* November 5, 2024.
(Geotek, 2023a)	Geotek, Inc. 2023. *Preliminary Geotechnical Evoluation.* November 13, 2023.
(Geotek, 2023b)	Geotek, Inc. 2023. Preliminary *Geotechnical Evaluation Addendum.* December 28, 2023.

Cited As:	**Source:**
(Helix, 2025)	Helix. 2025. *Emerald Hills Project Biological Technical Report*. February 2025.
(Hunsaker, 2024a)	Hunsaker and Associates. 2024. *Emerald Hills Drainage Study*. May 31, 2024.
(Hunsaker, 2024b)	Hunsaker and Associates. 2024. *Emerald Hills Stormwater Quality Management Plan*. November 16, 2024.
(Hunsaker, 2024c)	Hunsaker and Associates. 2024. Vesting Tentative Map, Grading, and Drainage Plan. Emerald Hills. City of San Diego, California.
(T&B Planning, 2024)	T&B Planning, Inc. 2024. *Preliminary Waste Management Plan for the Emerald Hills Project*. February 5, 2024.
(Urban Crossroads, 2024a)	Urban Crossroads, Inc. 2024. *Air Quality Impact Analysis*. July 22, 2024
(Urban Crossroads, 2024b)	Urban Crossroads, Inc. 2024. *Emerald Hills (PRJ-1107880) Local Mobility Analysis*. August 1, 2024.
(Urban Crossroads, 2024c)	Urban Crossroads, Inc. 2024. *Noise Impact Analysis*. August 15, 2024
(Urban Crossroads, 2024d)	Urban Crossroads, Inc. 2024. *Emerald Hills (PRJ-1107880) Vehicle Miles Traveled (VMT) Assessment*. July 31, 2024
(Urban Crossroads, 2024e)	Urban Crossroads, Inc. 2024. *Emerald Hills Construction Health Risk Assessment*. June 5, 2024.

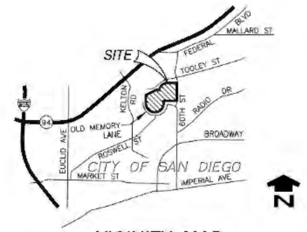
VESTING TENTATIVE MAP 3262907 / SITE DEVELOPMENT PERMIT 3262906
NEIGHBORHOOD DEVELOPMENT PERMIT 3273605 / NEIGHBORHOOD USE PERMIT 3286476

EMERALD HILLS

CITY OF SAN DIEGO, CALIFORNIA

LEGEND

- SUBDIVISION BOUNDARY
- EXISTING PROPERTY DATA — LOT 270
- PROPOSED LOT LINE WITH DIMENSION — 46'
- PROPOSED EASEMENT LINE
- PROPOSED LOT NUMBER — 7
- PROPOSED PAD ELEVATION — P=340.0
- PROPOSED FINISHED FLOOR ELEVATION — FF=340.7
- PROPOSED ARCH. PLAN TYPE — P-3
- PROPOSED CENTERLINE STREET ELEVATION
- PROPOSED STREET GRADE
- PROPOSED SPOT ELEVATION
- EXISTING CONTOURS
- PROPOSED CONTOURS — 870
- PROPOSED SLOPE BANK (2:1 MAX) — 2:1
- LIMITS OF PROPOSED GRADING
- PROPOSED RETAINING WALL
- PROPOSED BROW DITCH
- PROPOSED PUBLIC SEWER MAIN WITH MANHOLE
- EXISTING PUBLIC SEWER MAIN WITH MANHOLE
- PROPOSED PUBLIC WATER MAIN
- PROPOSED FIRE HYDRANT
- EXISTING PUBLIC WATER MAIN W/ FIRE HYDRANT
- PROPOSED STORM DRAIN
- EXISTING STORM DRAIN
- PROPOSED STREET LIGHT
- EXISTING STREET LIGHT
- EXISTING EASEMENT LABEL — 1
- PROPOSED EASEMENT LABEL — 1
- LIMITS OF WORK LINE
- PROPOSED AFFORDABLE UNIT — A
- PROPOSED MODEL HOME LOT — M
- PROPOSED MODEL HOME PARKING — P
- DESIGN NOTE CALLOUT — 1



VICINITY MAP

NOT TO SCALE

GRADING TABULATIONS

1. TOTAL AMOUNT OF SITE TO BE GRADED: 30.2 ACRES; 98% OF SITE
2. AMOUNT OF CUT: 176,400 CY
3. MAXIMUM DEPTH OF CUT: 36 FEET
4. AMOUNT OF FILL: 176,400 CY
5. MAXIMUM DEPTH OF FILL 27 FEET
6. MAXIMUM HEIGHT OF FILL SLOPES: 31 FEET, 2:1 MAX.
7. MAXIMUM HEIGHT OF CUT SLOPE: 33 FEET, 2:1 MAX.
8. AMOUNT OF IMPORT/EXPORT: 0 CY
9. RETAINING/CRIB WALLS LENGTH: 3340 FEET
10. RETAINING/CRIB WALL HEIGHT: 11.5 FEET

PROJECT AREA SUMMARY

DESCRIPTION	ACREAGE
PVT. OPEN SPACE LOTS	7.96
PUBLIC STREETS	6.42
SINGLE FAMILY LOTS	16.81
TOTAL	31.18

PARKING SUMMARY

REQUIRED		
NO. UNITS	SPACES REQ'D / UNIT (PER SDMC TABLE 142-05B)	TOTAL REQ.
123	2 SPACE / UNIT	246

PROVIDED	
TYPE	SPACES
GARAGE	246
TOTAL	246

PVT. OPEN SPACE LOT AREA SUMMARY

LOT NO.	LOT AREA
A	0.61
B	2.65
C	0.76
D	0.66
E	1.26
F	0.44
G	1.88
TOTAL AC	7.96

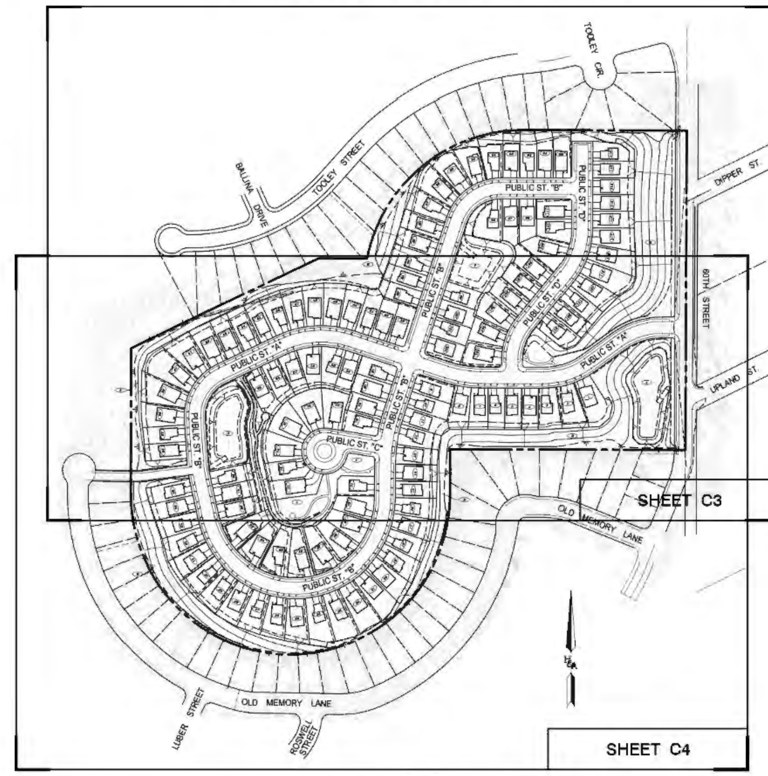
ARCHITECTURAL SUMMARY

PLAN	DISCRIPTION	LIVING AREA	NO. UNITS	UNIT MIX	AFFORDABLE UNITS
1 1342	3 BEDROOM	1,352 SF	26	21%	7
2 1992	3 BEDROOM	1,992 SF	29	24%	6
3 2057	4 BEDROOM	2,057 SF	33	27%	0
4 2516	5 BEDROOM	2,516 SF	35	28%	0
TOTAL			123	100%	13

THE TOTAL NUMBER OF AFFORDABLE UNITS IS 13 (10%) AT A COST AFFORDABLE TO MEDIAN INCOME HOUSEHOLDS

REQUESTED INCENTIVE

DEVELOPMENT REGULATION		PROPOSED INCENTIVE
GENERAL FENCE REGULATIONS ALL ZONES	SDMC 142.0310(c)(1)(A) SOLID FENCES LOCATED ON THE FRONT OR STREET SIDE PROPERTY LINE SHALL NOT EXCEED 3 FEET IN HEIGHT	PROPOSED INCENTIVE TO ALLOW 6 FOOT FENCES TO BE LOCATED ON THE STREET SIDE PROPERTY LINE FOR LOTS: 9, 53, 78, 81, 95, 102, 103 & 111. FOR LOTS WHERE AN INCENTIVE FOR FENCE HEIGHT IS REQUESTED, HEIGHT SHALL NOT EXCEED 3 FEET WITHIN VISIBILITY TRIANGLES.



SHEET KEY MAP

NOT TO SCALE

REQUESTED WAIVERS

DEVELOPMENT REGULATION			PROPOSED DEVIATION
RS-1-7	STREET FRONTAGE	SDMC TABLE 131-04D PERMITS A MINIUM STREET FRONTAGE OF 50 FEET	PROPOSED DEVIATION TO ALLOW A MINIMUM STREET FRONTAGE AS SHOWN IN LOT SUMMARY TABLE ON SHEET C2 FOR LOTS: 1-8, 10, 11, 14-41, 42, 45-52, 54, 57, 58, 60, 61, 72-79, 82, 83, 85, 87-97, 104, 105, 113-122
DRIVEWAY WIDTH REQUIREMENTS		SDMC 142.0560(j)(3) LIMITS DRIVEWAY CUTS ON RESIDENTIAL PROPERTY TO 40% OF THE LOT FRONTAGE	PROJECT PROPOSES 16-FOOT-WIDE DRIVEWAYS WITH A 3-FOOT FLARE ON EACH SIDE FOR A TOTAL OF A 22-FOOT-WIDE DEPRESSED WIDTH. PER SDMC SECTION 142.0560(j)(1), TABLE 42-05N, THE MINIMUM REQUIRED AND MAXIMUM ALLOWED DRIVEWAY WIDTH (OUTSIDE A PARKING IMPACT OVERLAY ZONE) FOR A DETACHED SINGLE DWELLING UNIT (LOT WIDTHS 50-FEET OR LESS) THE MINIMUM REQUIRED, AND MAXIMUM ALLOWED DRIVEWAY WIDTHS ARE 12-FEET AND 20-FEET, RESPECTIVELY. ADDITIONALLY, PER SDMC SECTION 142.0560(j)(1), TABLE 142-05M, FOR A DETACHED SINGLE DWELLING UNIT (LOT WIDTHS GREATER THAN 50-FEET) THE MINIMUM REQUIRED, AND MAXIUM ALLOWED DRIVEWAY WIDTHS ARE 12-FEET AND 25-FEET, RESPECTIVELY. HOWEVER, PER STANDARD DRAWING SDG 164, THAT IS REFERRED TO IN LDC142.0560(j)(3), THE PROPOSED 22-FOOT-WIDE CURB OPENING (16-FOOT-WIDE DRIVEWAY PLUS 3-FOOT FLARE ON EACH SIDE) ON ANY LOTS LESS THAN 55-FEET WIDE (XX OF THE 123 TOTAL SINGLE-FAMILY RESIDENTIAL LOTS IN THIS SUBDIVISION WOULD EXCEED THE 40% MAXIMUM FRONTAGE FOR A CURB OPENING IMPOSED BY THAT STANDARD DRAWING. LOTS: 1-61, 71-83, 85-97, 99-101, 104-108 & 112-123).
MINIMUM LOT DIMENSIONS RS-1-7	LOT WIDTH	SDMC TABLE 131-04D PERMITS A MINIMUM LOT WIDTH OF 50 FEET	PROPOSED DEVIATION TO ALLOW A MINIMUM LOT WIDTH OF AS SHOWN IN LOT SUMMARY TABLE ON SHEET C2 FOR LOTS: 4-7, 10-15, 33-37, 45, 51, 52, 54, 57, 58, 60, 61, 82, 83, 85, 92-97, 112-116, 121 & 122.
	LOT WIDTH (CORNER)	SDMC TABLE 131-04D PERMITS A MINIMUM LOT WIDTH (CORNER) OF 55 FEET	PROPOSED DEVIATION TO ALLOW A MINIMUM LOT WIDTH (CORNER) AS SHOWN IN LOT SUMMARY TABLE ON SHEET C2 FOR LOTS: 9, 53, 78, 81, 95 & 111
	LOT DEPTH	SDMC TABLE 131-04D PERMITS A MINIMUM LOT DEPTH OF 95 FEET	PROPOSED DEVIATION TO ALLOW A MINIMUM LOT DEPTH AS SHOWN IN LOT SUMMARY TABLE ON SHEET C2 FOR LOTS: 110 & 111

GENERAL DESIGN NOTES

1. GRADING SHOWN HEREON IS PRELIMINARY AND MAY BE SUBJECT TO MINOR REFINEMENTS IN FINAL DESIGN. FINAL GRADING PLANS WILL CONFORM TO THE APPROVED PERMIT AND EXHIBITS.
2. DRAINAGE FACILITIES TO BE CONSTRUCTED PER CITY OF SAN DIEGO STANDARDS.
3. ALL LENGTHS, DISTANCES, LOT DIMENSIONS AND CURVE RADII ARE APPROXIMATE.
4. ALL UTILITIES SHALL BE UNDERGROUND AND EASEMENTS PROVIDED AS NECESSARY.
5. ALL ON-SITE WATER AND SEWER FACILITIES SHOWN ON THIS DRAWING ARE PUBLIC AND SHALL BE DESIGNED TO MEET THE REQUIREMENTS OF THE CURRENT CITY WATER & SEWER FACILITY DESIGN GUIDELINES SHALL BE REVIEWED AS PART OF THE BUILDING PERMIT PLAN CHECK.
6. THERE ARE NO PROPOSED OR EXISTING BUS/TRANSIT STATIONS OR STOPS.
7. INDIVIDUAL TRASH PICKUP IS PROPOSED AS PART OF THIS PROJECT.
8. BUILDING ADDRESS NUMBERS SHALL BE VISIBLE AND LEGIBLE FROM THE STREET OR ROAD FRONTING THE PROPERTY. (PER UFC 901.4.4).
9. IMPROVEMENTS SUCH AS DRIVEWAYS, UTILITIES, DRAINS AND WATER AND SEWER LATERALS SHALL BE DESIGNED SO AS TO NOT PROHIBIT THE PLACEMENT OF STREET TREES, ALL TO THE SATISFACTION OF THE CITY MANAGER.
10. CALIFORNIA BUILDING CODE CONSTRUCTION TYPE TO BE DETERMINED AT BUILDING PERMIT.
    FIRE SPRINKLERS: FULL NFPA-13 FIRE SPRINKLER SYSTEM.
    NUMBER OF STORIES: 2-STORY.
11. CALIFORNIA BUILDING CODE OCCUPANCY GROUP TO BE DETERMINED AT BUILDING PERMIT.
12. NO TREES OR SHRUBS EXCEEDING THREE FEET IN HEIGHT AT MATURITY SHALL BE INSTALLED WITHIN TEN FEET OF ANY SEWER FACILITY AND FIVE FEET OF ANY WATER.
13. FIRE ACCESS ROADWAY SIGNS OR RED CURBS WILL BE PROVIDED IN ACCORDANCE WITH BFLS POLICY A-96-1. TEMPORARY STREET SIGNS WILL BE PROVIDED IN ACCORDANCE WITH UFC 901.4.5
14. ALL DRAIN SYSTEMS NOT LOCATED IN A PUBLIC STREET OR PUBLIC DRAINAGE EASEMENTS SHALL BE PRIVATE.
15. ADEQUATE NOISE ATTENUATION WILL BE PROVIDED TO ENSURE AN INTERIOR NOISE LEVEL OF 45 dB CNEL FOR ALL SLEEPING ROOMS AND AN INTERIOR NOISE LEVEL OF 50dB FOR ALL OTHER INDOOR AREAS.
16. PRIOR TO THE ISSUANCE OF ANY CONSTRUCTION PERMIT, THE OWNER/PERMITTEE SHALL ENTER INTO A MAINTENANCE AGREEMENT FOR THE ONGOING PERMANENT BMP MAINTENANCE SATISFACTORY TO THE CITY ENGINEER.
17. PRIOR TO THE ISSUANCE OF ANY CONSTRUCTION PERMIT, THE OWNER/PERMITTEES SHALL INCORPORATE ANY CONSTRUCTION BEST MANAGEMENT PRACTICES NECESSARY TO COMPLY WITH CHAPTER 14, ARTICLE 2, DIVISION 1 (GRADING REGULATIONS) OF THE SAN DIEGO MUNICIPAL CODE, INTO THE CONSTRUCTION PLANS OR SPECIFICATIONS.
18. PRIOR TO THE ISSUANCE OF ANY CONSTRUCTION PERMIT, THE APPLICANT SHALL SUBMIT A TECHNICAL REPORT THAT WILL BE SUBJECT TO FINAL REVIEW AND APPROVAL BY THE CITY ENGINEER, BASED ON THE STORM WATER STANDARDS IN EFFECT AT THE TIME OF THE CONSTRUCTION PERMIT ISSUANCE
19. DEVELOPMENT OF THIS PROJECT SHALL COMPLY WITH ALL STORM WATER CONSTRUCTION REQUIREMENTS OF THE STATE CONSTRUCTION GENERAL PERMIT, ORDER NO. 2009-0009DWQ, OR SUBSEQUENT ORDER, AND THE MUNICIPAL STORM WATER PERMIT, ORDER NO. R9-2013-0001, OR SUBSEQUENT ORDER. IN ACCORDANCE WITH ORDER NO. 2009-0009DWQ, OR SUBSEQUENT ORDER, A RISK LEVEL DETERMINATION SHALL BE CALCULATED FOR THE SITE AND A STORM WATER POLLUTION PREVENTION PLAN (SWPPP) SHALL BE IMPLEMENTED CONCURRENTLY WITH THE COMMENCEMENT OF GRADING ACTIVITIES.
20. PRIOR TO THE ISSUANCE OF A GRADING OR A CONSTRUCTION PERMIT, A COPY OF THE NOTICE OF INTENT (NOI) WITH A VALID WASTE DISCHARGE ID NUMBER (WDID#) SHALL BE SUBMITTED TO THE CITY OF SAN DIEGO AS A PROOF OF THE ENROLLMENT UNDER THE CONSTRUCTION GENERAL PERMIT. WHEN OWNERSHIP OF THE ENTIRE SITE OR PORTIONS OF THE SITE CHANGES PRIOR TO FILING OF THE NOTICE OF TERMINATION (NOT) A REVISED NOI SHALL BE SUBMITTED ELECTRONICALLY TO THE STATE WATER RESOURCES BOARD IN ACCORDANCE WITH THE PROVISIONS AS SET FORTH IN SECTION II.C OF ORDER NO 2009-0009-DWQ AND A COPY SHALL BE SUBMITTED TO THE CITY.
21. ALL BEARINGS AND DISTANCES ARE LOCATED AND SHOWN ON C8.
22. NO PRIVATE IMPROVEMENTS (INCLUDING LANDSCAPING, ENHANCED PAVING, PRIVATE UTILITIES, OR STRUCTURES OF ANY KIND) THAT COULD INHIBIT THE MAINTENANCE, REPAIR, OR REPLACEMENT OF PUBLIC UTILITIES, MAY BE INSTALLED, CONSTRUCTED, OR LOCATED WITHIN THE LIMITS OF A PUBLIC WATER, SEWER OR GENERAL UTILITY EASEMENT WITHOUT A CITY APPROVED AND COUNTY RECORDED ENCROACHMENT AND MAINTENANCE REMOVAL AGREEMENT (EMRA).
23. ALL WATER LINES SERVING THIS DEVELOPMENT (INCLUDING DOMESTIC, IRRIGATION, AND FIRE) MUST PASS THROUGH A PERMITTED, PRIVATE, ABOVE GROUND, BACKFLOW PREVENTION DEVICE (BFPD).
24. THE OWNER/PERMITTEE SHALL BE RESPONSIBLE FOR ANY DAMAGE CAUSED TO CITY OF SAN DIEGO WATER AND SEWER FACILITIES IN THE VICINITY OF THE PROJECT SITE, DUE TO THE CONSTRUCTION ACTIVITIES ASSOCIATED WITH THIS PROJECT, IN ACCORDANCE WITH MUNICIPAL CODE SECTION 142.0607. IN THE EVENT ANY SUCH FACILITY LOSES INTEGRITY THEN, THE OWNER/PERMITTEE SHALL REPAIR OR RECONSTRUCT ANY DAMAGED PUBLIC WATER AND SEWER FACILITY IN A MANNER SATISFACTORY TO THE PUBLIC UTILITIES DIRECTOR AND CITY ENGINEER.
25. NO PUBLIC WATER, SEWER OR GENERAL UTILITY EASEMENTS CURRENTLY EXIST ON THE SUBJECT PROPERTY.
26. THIS PROJECT IS A MULTIPLE "UNIT" SUBDIVISION. IT IS THE INTENT THAT MULTIPLE FINAL MAPS BE FILED PURSUANT TO SECTION 66456.1 OF THE SUBDIVISION MAP ACT. THE FINAL MAP MAY CONSIST OF ONE OR MORE MULTIPLE LOTS AS SHOWN ON THIS TENTATIVE MAP.
27. A FINAL MAP SHALL BE FILED AT THE COUNTY RECORDER'S OFFICE PRIOR TO THE EXPIRATION OF THE TENTATIVE MAP, IF APPROVED.
28. NO OBSTRUCTION INCLUDING SOLID WALLS IN THE VISIBILITY AREA SHALL EXCEED 3 FEET IN HEIGHT. PER SDMC SECTION 142.0409 (B)(2), PLANT MATERIAL, OTHER THAN TREES, LOCATED WITHIN VISIBILITY AREAS OR THE ADJACENT PUBLIC RIGHT-OF-WAY SHALL NOT EXCEED 36 INCHES IN HEIGHT, MEASURED FROM THE LOWEST GRADE ABUTTING THE PLANT MATERIAL TO THE TOP OF THE PLANT MATERIAL.
29. EXISTING BUILDINGS/STRUCTURES: AN EXISTING 2-STORY TRANSMITTER BUILDING IS LOCATED ON-SITE, DATE OF CONSTRUCTION 1948-1949. TWO EXISTING TRANSMISSION TOWERS ARE LOCATED ON-SITE. ALL EXISTING BUILDING AND STRUCTURES ARE TO BE REMOVED.
30. NO EXISTING LOW INCOME UNITS ARE LOCATED ON-SITE.
31. APPROVAL FROM THE CALIFORNIA DEPARTMENT OF HEALTH SERVICES - DRINKING WATER FIELD OPERATIONS BRANCH WILL BE PROVIDED IN FINAL ENGINEERING FOR WATER AND SEWER SEPARATIONS LESS THAN 10 FEET.
32. EXTERIOR REFUSE, ORGANIC WASTE & RECYCLABLE MATERIAL STORAGE AREA PROVIDED: 1,350 SQUARE FEET (ASSUMES SMALLEST 32 GALLON CARTS WITH FOOTPRINT OF 3.66 SQUARE FEET. 3.66x3x123=1,350 SQUARE FEET)

DEVELOPMENT SUMMARY

THE PROPOSED 31.18 ACRE DEVELOPMENT SITE, APN 543-340-02-00 IS LOCATED AT 5702 OLD MEMORY LANE IN THE ENCANTO NEIGHBORHOODS COMMUNITY PLAN. THE PROPERTY IS PRESENTLY OCCUPIED BY EXISTING BROADCAST TOWERS AND TRANSMITTER BUILDING. THE CURRENT DEVELOPMENT PROPOSAL CONSISTS OF THE CONSTRUCTION OF 123 SINGLE FAMILY FOR SALE LOTS AND 7 PRIVATE HOA OPEN SPACE LOTS, ALONG WITH PUBLIC ROAD AND PUBLIC & PRIVATE UTILITY IMPROVEMENTS. ALL EXISTING BROADCAST TOWERS AND OUTBUILDINGS ON SITE WILL BE REMOVED AS PART OF THE DEVELOPMENT PROPOSAL. THE CURRENT PROJECT REQUIRES A VESTING TENTATIVE MAP (VTM), A SITE DEVELOPMENT PERMIT (SDP) FOR ENVIRONMENTALLY SENSITIVE LANDS, NEIGHBORHOOD DEVELOPMENT PERMIT AND NEIGHBORHOOD USE PERMIT. SDP/NDP FOR RETAINING WALLS WITHIN 60TH STREET.

GENERAL NOTES

1. SITE AREA DATA:
   GROSS SITE AREA: 31.18 ACRES
   NET SITE AREA: 24.87 ACRES (GROSS AREA - ROW DEDICATIONS)
2. TOTAL NUMBER OF EXISTING/PROPOSED LOTS:
   EXISTING LOTS: 1
   PROPOSED LOTS: 130 (123 RESIDENTIAL + 7 HOA OPEN SPACE LOTS)
3. TOTAL NUMBER OF PROPOSED UNITS: 123 SINGLE FAMILY (13 UNITS ARE AFFORDABLE)
4. COMMUNITY PLAN: ENCANTO NEIGHBORHOODS
5. COMMUNITY PLAN LAND USE DESIGNATION:
   EXISTING/PROPOSED: RESIDENTIAL VERY LOW 0-4 DU/AC
6. ZONING:
   EXISTING: RS-1-2
   PROPOSED: RS-1-2
7. OVERLAY ZONES: AIRPORT LAND USE COMPATIBILITY OVERLAY ZONE
8. DENSITY PROPOSED:
   GROSS SITE DENSITY: 3.9 DU/AC (123 UNITS/31.18 AC)
9. APN: 543-340-02-00
10. AVERAGE DAILY TRIPS: 1230 (123 UNITS x 10 TRIPS)
11. GEO HAZARD ZONE: 52
12. NAD 27 COORDINATE INDEX: 203-1748
    NAD 83 COORDINATE INDEX: 1843-6309

TOPO SOURCE

THE TOPOGRAPHIC MAPPING REFLECTED HEREON WAS COMPILED BY AERIAL PHOTOGRAMMETRY METHODS CONDUCTED BY R.J. LUNG AND ASSOCIATES FLOWN ON APRIL 4, 2021 TOGETHER WITH CONVENTIONAL SURVEYING METHODS CONDUCTED BY HUNSAKER AND ASSOCIATES SAN DIEGO, INC. AND FIELD VERIFIED ON FEBRUARY 8, 2024.

MAPPING & MONUMENTATION

A FINAL MAP SHALL BE FILED AT THE COUNTY RECORDER'S OFFICE PRIOR TO THE EXPIRATION OF THE TENTATIVE MAP. A DETAILED PROCEDURE OF SURVEY SHALL BE SHOWN ON THE FINAL MAP AND ALL PROPERTY CORNERS SHALL BE MARKED WITH DURABLE SURVEY MONUMENTS.

BASIS OF BEARINGS

THE BASIS OF BEARINGS FOR THIS TENTATIVE MAP IS THE CALIFORNIA COORDINATE SYSTEM, CCS83, ZONE 6, EPOCH 1991.35 AND IS DETERMINED BY G.P.S. MEASUREMENTS AND WERE ESTABLISHED FROM G.P.S. STATION 1173 AND G.P.S. STATION 1181 PER ROS 14492. THE BEARING FROM G.P.S. STATION 1173 TO G.P.S STATION 1181 IS N80°42'55"W. QUOTED BEARINGS FROM REFERENCE MAPS OR DEEDS MAY OR MAY NOT BE IN TERMS OF SAID SYSTEM. THE COMBINED GRID FACTOR AT G.P.S. STATION 1173 IS 1.00000025. GRID DISTANCE X COMBINED GRID FACTOR ELEVATION AT G.P.S. STATION 1173 IS 287.33' NGVD29.

BENCH MARK / DATUM

CITY OF SAN DIEGO BRASS PLUG IN THE TOP OF CURB AT THE SOUTHEAST CORNER OF THE INTERSECTION OF LUBER STREET AND OLD MEMORY LANE ELEV. 315.558'

DATUM: MSL CITY OF SAN DIEGO

OWNER

VERTICAL BRIDGE LANDCO, LLC
750 PARK OF COMMERCE DRIVE
SUITE 200
BOCA RATON, FL 33487

DocuSigned by:
Buddy Thomas

LAND SURVEYOR

PER SECTION 66424.5(A) OF THE SUBDIVISION MAP ACT, A TENTATIVE MAP NEED NOT BE BASED UPON AN ACCURATE OR DETAILED FINAL SURVEY OF THE PROPERTY. THE LINES AND INFORMATION REFERENCED HEREON DO NOT CONSTITUTE A BOUNDARY SURVEY OF THE PROJECT. IT IS UNDERSTOOD THAT FURTHER APPROVED CONSTRUCTION PERMITTING BEYOND THE TENTATIVE MAP WILL BE NECESSARY. THE TOPOGRAPHIC INFORMATION AND GEODETIC REFERNCES REFLECTED HEREON WERE CONDUCTED UNDER MY SUPERVISION.

6-10-2025
JIMMY J. ELMORE P.L.S. 8483 DATE
HUNSAKER & ASSOCIATES SAN DIEGO, INC.

LICENSED LAND SURVEYOR · JIMMY J. ELMORE · L.S. 8483 · STATE OF CALIFORNIA

ENGINEER

HUNSAKER & ASSOCIATES SD,INC.
9707 WAPLES STREET
SAN DIEGO, CA 92121
(858) 558-4500

Alisa S. Vialpando 6/10/25
ALISA S. VIALPANDO R.C.E. 47945 DATE

REGISTERED PROFESSIONAL ENGINEER · ALISA S. VIALPANDO · C 47945 · CIVIL · STATE OF CALIFORNIA

The City of SAN DIEGO

Vesting Tentative Map

5702 Old Memory Lane/PRJ-1107880

Development Services Department

FIGURE No. 1

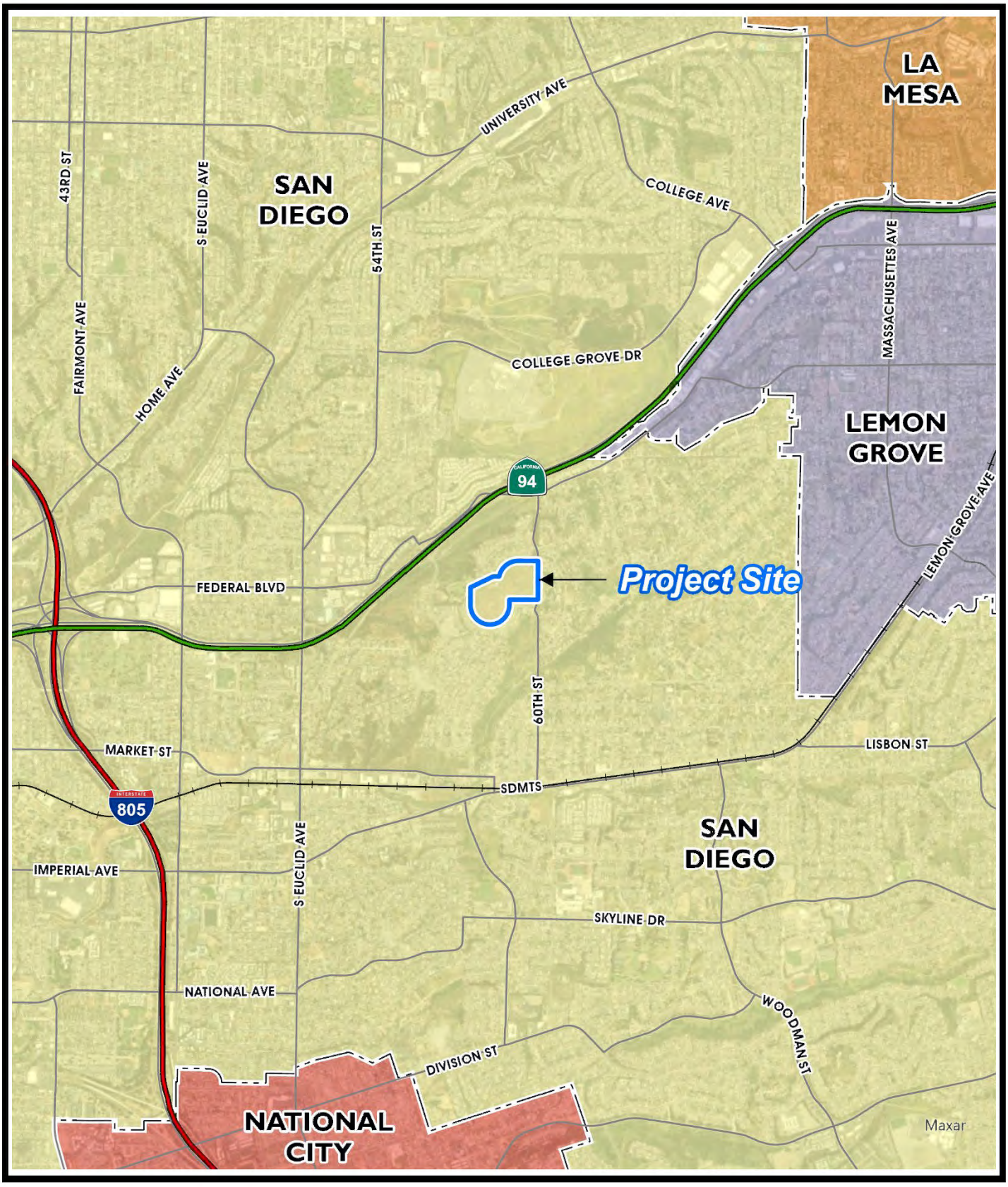
The City of SAN DIEGO

Aerial Photograph

5702 Old Memory Lane/PRJ-1107880

Development Services Department

FIGURE No. 2



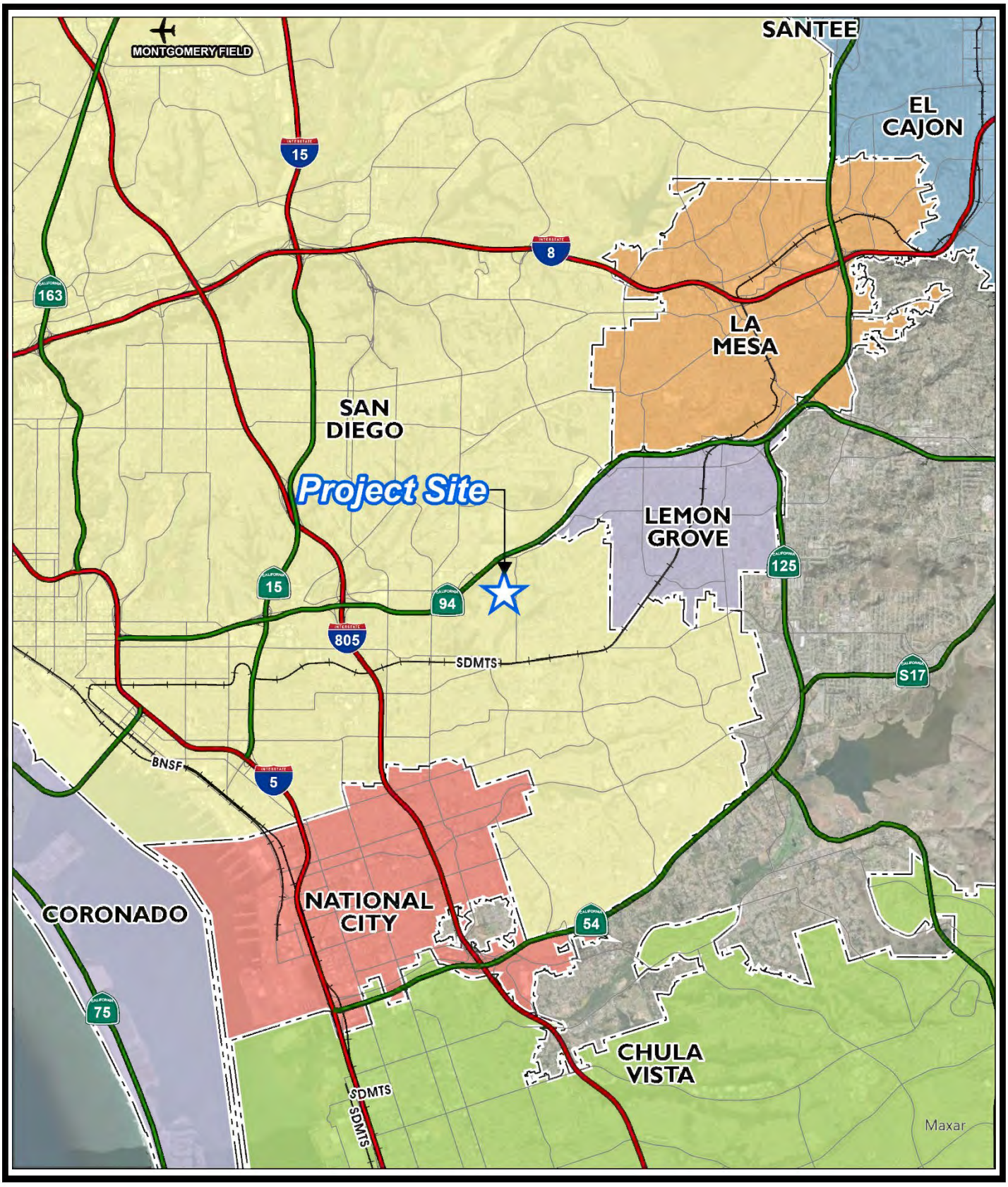
The City of SAN DIEGO

Vicinity Map

5702 Old Memory Lane/PRJ-1107880

Development Services Department

FIGURE No. 3



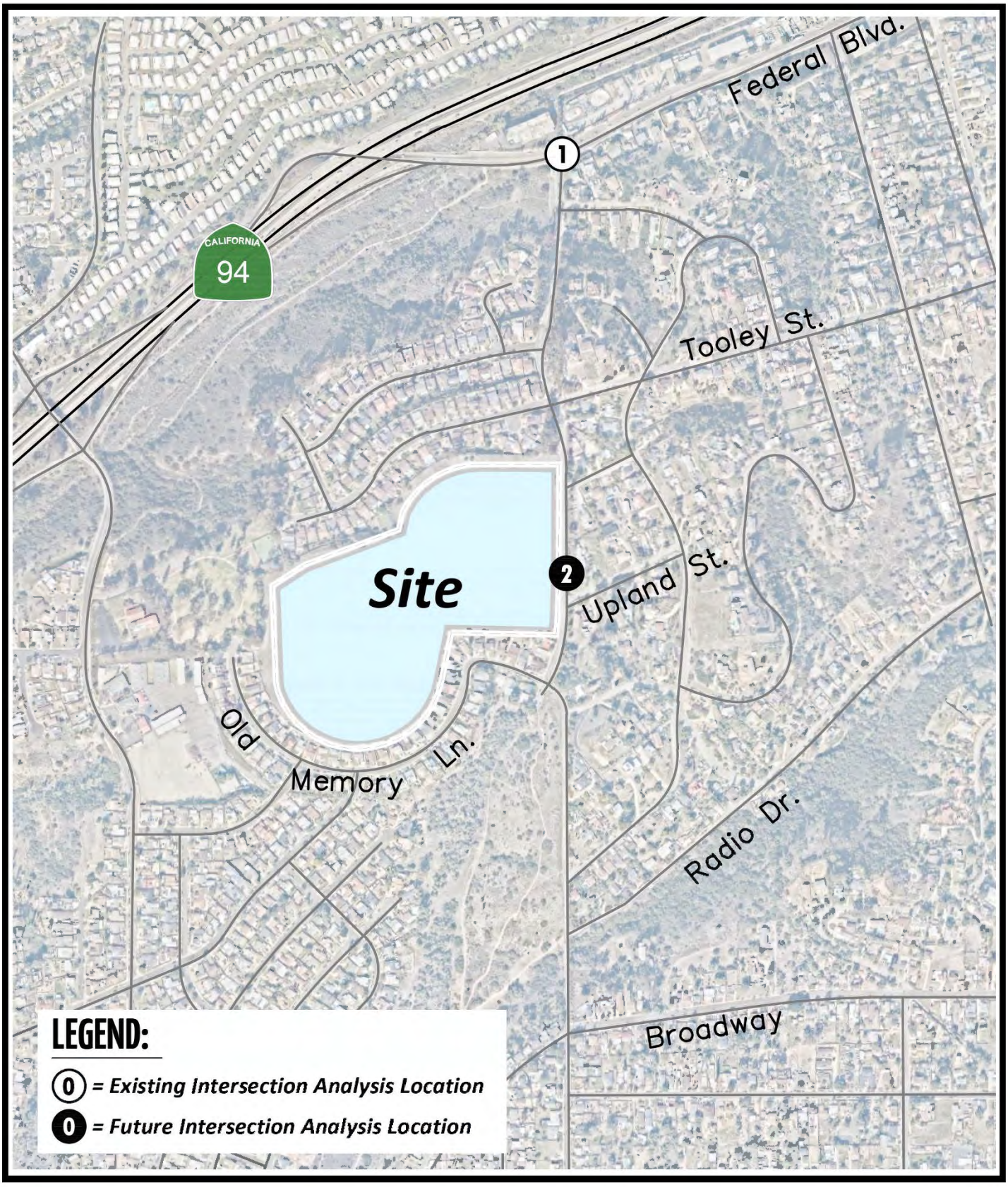
The City of SAN DIEGO

Regional Map

5702 Old Memory Lane/PRJ-1107880

Development Services Department

FIGURE No. 4



The City of SAN DIEGO

Study Area

5702 Old Memory Lane/PRJ-1107880

Development Services Department

FIGURE No. 5