



**U.S. Department of Housing and Urban**

**Development**

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## **Environmental Assessment**

### **Determinations and Compliance Findings for HUD-assisted Projects**

### **24 CFR Part 58**

#### **Project Information**

**Project Name:** Crest on Imperial Apartments

**Responsible Entity:** City of San Diego

**Grant Recipient** (if different than Responsible Entity): Crest on Imperial, LP

**State/Local Identifier:** California/ City of San Diego (063210)

**Preparer:** Ryan Birdseye, Principal  
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**Certifying Officer Name and Title:** Rebecca Malone, AICP, Program Manager, City Planning Department, City of San Diego

**Consultant** (if applicable): Ryan Birdseye, Principal  
Birdseye Planning Group, LLC  
P.O. Box 1956, Vista, CA 92085  
760-712-2199

**Responsible Agency:** City of San Diego  
City Planning Department, CEQA and Environmental Policy  
202 C Street, Floor 5, MS 413  
San Diego, CA 92101

**Project Location:** The project site is located at 5020-5044 Imperial Avenue and 101 50th Street in San Diego, California. The site is located on the north side of Imperial Avenue, east of 50<sup>th</sup> Street and west of Euclid Avenue in the City of San Diego, San Diego County, California. Interstate 805 is located approximately one-half mile to the west. The subject property is comprised of parcels addressed as 5020 Imperial Avenue, 5030 Imperial Avenue, 5042 Imperial Avenue, 5044 Imperial Avenue and 101 50<sup>th</sup> Street (APNs 548-150-07-00, 548-150-21-00, 548-150-23-01, -02, -03, and 548-150-32-00. The 1.35-acre site is located at the northeast corner of 50<sup>th</sup> Street and Imperial Avenue. The site is bordered to the north by single- and multifamily residences, to east by single-family residences and Euclid Avenue, to the west by 50<sup>th</sup> Street and

single-family residences and to the south by Imperial Avenue then a mixed-use commercial and multifamily residential building. The site is developed with three existing commercial buildings and associated parking and two residences. Two of the parcels are vacant lots. The subject parcels are zoned Commercial Neighborhood (CN) 1-3 as are the parcels located to the south, east and west. The parcels located to the north are zoned Residential Multifamily (RM) 3-7. All subject parcels are designated Multiple Use in the City of San Diego General Plan. The site is located within the Encanto Neighborhoods Community Planning Area and designated Mixed Use Neighborhoods Low. See Figure 1, Vicinity Map.

In addition, the site is within the Airport Influence Area (San Diego International Airport Review Area 1, Community Plan Implementation Overlay Zone (CPIOZ) zone; Parking Standards Transit Priority Area, Transit Priority Area and Affordable Housing Parking Demand (Medium).

**Description of the Proposed Project** [24 CFR 50.12 & 58.32; 40 CFR 1508.25]: The project proposes to construct one new multifamily residential building on a 1.35-acre site located at the northeast corner of 50<sup>th</sup> Street and Imperial Avenue. The building would have a five- and four-story component designed in a u-shaped configuration. The five-story portion of the building would be located on the northern portion of the site and have one below grade basement level containing 34 parking stalls, motorcycle and bicycle parking (20 spaces total), bicycle repair shop, trash room, mechanical room and related components. A total of one accessible parking space, one accessible van space, one Electric Vehicle (EV) accessible van space and three EV parking stalls would be provided. The four-story portion of the building would front Imperial Avenue. The project would provide a total of 100 units.

The five-story portion of the building would be a maximum of 46' 5 1/2" with a 3' 6" parapet. The four-story portion of the building would be a 37' 2" with a 3' 6" parapet. Primary building access would be from 50<sup>th</sup> Street on the west side. Vehicles would enter the basement parking garage via a two-access driveway. Pedestrian access to the lobby/management office (1,567 square feet), television room (218 square feet) and vocation room (1,172 square feet) would be located on the west side of the building on the ground floor. Amenities would include a residential courtyard/patio, a roof deck on level three of the four-story portion of the building and a play area. The overall building footprint would be 28,750 square feet with a total building area of 86,046 square feet. The project would provide full height curb, gutter, and sidewalk along both frontages. The project is proposed to be constructed in one phase, with construction assumed to be completed in 2027. The project would connect to existing electrical, water, and sewer utility infrastructure.

The project would provide 100 units comprised of 68 two-bedroom units and 32 three-bedroom units. One unit would be reserved for an on-site manager. The two-bedroom units would be an average of 787 square feet; the three-bedroom units would be an average of 1,044 square feet. Of the total, one three-bedroom unit would be reserved for an on-site manager. A total of 19 units would be allocated to tenants at 80 percent Area Median Income (AMI, 58 units would be



Figure 1—Vicinity Map

□ - Project Site

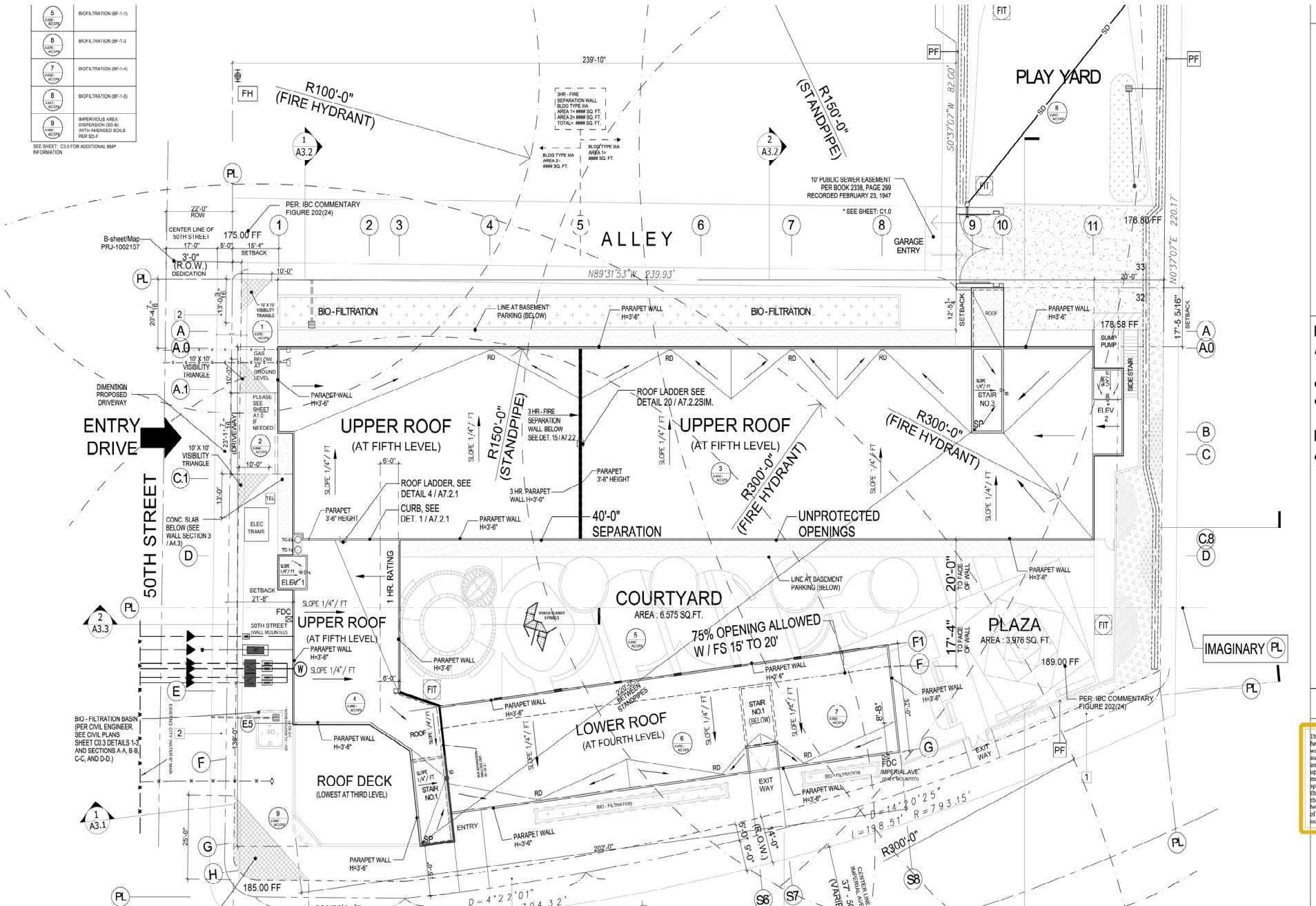
allocated to tenants at 60 percent of AMI; 11 units would be allocated to tenants at 50 percent AMI and 11 units would be allocated to tenants at 30 percent AMI. As stated, the project site is located within a Transit Priority Area. MTS bus Route 4 is located along Imperial Avenue and there are existing stops fronting the site. The proposed site plan is shown in Figure 2.

The project will be fully electric and include rooftop solar energy systems. Further, the project would be compliant with the California Energy Code Title 24, California Building Energy Efficiency Standards (2022) as well as other applicable regulations that pertain to the use of energy efficient design methods and materials. The installation of EnergyStar appliances will be required as a condition of project approval. The project would implement water conservation strategies focused on achieving the goals set forth by Senate Bill X7-7 (2009), which mandated a statewide 20% per capita reduction in water consumption by 2020. This would include the installation of low flow plumbing fixtures and use of native, drought tolerant landscaping.

The project will, in part, be constructed using federal funding (i.e., CDBG program); and thus, it is subject to National Environmental Policy Act (NEPA) review by the United States Department of Housing and Urban Development (HUD).

**Statement of Purpose and Need for the Proposal** [40 CFR 1508.9(b)]: The purpose of the proposed project is to provide affordable apartment housing for income qualifying residents. As reported in the City of San Diego Housing Element 2021-2029, the projected housing need obligation for the planning period is 108,036 total units. Of these units, the City of San Diego will need to accommodate 27,549 low to extremely low-income housing units. The project would contribute 100 total units to the City of San Diego affordable housing allocation.

**Existing Conditions and Trends** [24 CFR 58.40(a)]: The 1.35-acre project site consists of six parcels addressed as 5020, 5030, 5042, and 5044 Imperial Avenue and 101 50<sup>th</sup> Street (APNs 548-150-07-00, 548-150-21-00, 548-150-23-01, -02, -03, and 548-150-32-00. The 1.35-acre site is located at the northeast corner of 50<sup>th</sup> Street and Imperial Avenue. The site is bordered to the north by single- and multifamily residences, to east by single-family residences and Euclid Avenue, to the west by 50<sup>th</sup> Street and single-family residences and to the south by Imperial Avenue then a mixed-use commercial and multifamily residential building. The site is developed with three existing commercial buildings and associated parking and two residences. Two of the parcels are vacant lots. The subject parcels are zoned Commercial Neighborhood (CN) 1-3 as are the parcels located to the south, east and west. The parcels located to the north are zoned Residential Multifamily (RM) 3-7. All subject parcels are designated Multiple Use in the City of San Diego General Plan. The site is located within the Encanto Neighborhoods Community Planning Area and designated Mixed-Use Neighborhoods Low. No change to the existing land use or zoning designation is proposed.



## Figure 2—Site Plan

## Funding Information

HUD Program	Funding Amount
Community Development Block Grant	\$4,270,000

**Estimated Total HUD Funded Amount:** \$4,270,000

**Estimated Total Project Cost** (HUD and non-HUD funds) [24 CFR 58.32(d)] \$69,000,000

## Compliance with 24 CFR 50.4, 58.5, and 58.6 Laws and Authorities

Record below the compliance or conformance determinations for each statute, executive order, or regulation. Provide credible, traceable, and supportive source documentation for each authority. Where applicable, complete the necessary reviews or consultations and obtain or note applicable permits of approvals. Clearly note citations, dates/names/titles of contacts, and page references. Attach additional documentation as appropriate.

<b>Compliance Factors:</b> Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
<b>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 and 58.6</b>		
<b>Airport Hazards</b>  24 CFR Part 51 Subpart D	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	The closest airport to the project site is San Diego International Airport which is located 7.2 miles to the west/northwest. The project site is within Airport Influence Area (AIA) Review Area 1 of the San Diego International Airport Land Use Compatibility Plan (ALUCP) (San Diego County Regional Airport Authority 2014). The site is not within a mapped Safety Zone. Properties located within Review Area 1 must comply with the noise, safety, and airspace protection compatibility requirements in Sections 132.1510 through 132.1520 of the San Diego Municipal Code and with the aircraft overflight notification requirements in accordance with Section 132.1525. A Federal Aviation Administration (FAA) Part 77 aeronautical study was not required for the project. The project would not result in a safety

		<p>hazard for people residing or working at the project site. Further, based on the building height (46' 5 1/2" with a 3' 6" parapet), City of San Diego staff have determined the proposed building would not cause a hazard to airport operations or present a hazard to project residents.</p> <p><i>Source List: [a, b, c]</i></p>
<p><b>Coastal Barrier Resources</b></p> <p>Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]</p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>	<p>No coastal barrier resources under the protection of the Coastal Barrier Resource Act occur in California. The Coastal Barrier Resources Act does not apply.</p> <p><i>Source List: [d]</i></p>
<p><b>Flood Insurance</b></p> <p>Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]</p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>	<p>The site is designated an Area of Minimal Flood Hazard Zone X in Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) 06073C1904G, prepared May 16, 2012. The Zone X designation defines an area outside a flood zone.</p> <p>The Flood Disaster Protection Act of 1973 (42 U.S.C. 4012a) requires that projects receiving federal assistance and located in an area identified by FEMA as being within a Special Flood Hazard Area (SFHA) be covered by flood insurance under the National Flood Insurance Program (NFIP). To purchase flood insurance, the community must be participating in the NFIP. The City of San Diego is a participant in the NFIP program administered by FEMA; thus, flood insurance can be purchased for the proposed project. No flood insurance would be required. No significant or adverse impacts associated with the Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 would occur.</p> <p><i>Source List: [o]</i></p>

**STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 & 58.5**

Clean Air	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	The project site is located within the San Diego Air Basin, which is under the jurisdiction of the San
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<p>Clean Air Act, as amended, particularly section 176(c) &amp; (d); 40 CFR Parts 6, 51, 93</p>	<input type="checkbox"/> <input checked="" type="checkbox"/>	<p>Diego Air Pollution Control District (SDAPCD). The San Diego Air Basin is designated by state air quality standards as nonattainment for ozone and particulate matter (PM) less than 10 microns (PM<sub>10</sub>) and less than 2.5 microns (PM<sub>2.5</sub>) in equivalent diameter. The SDAB is a federal non-attainment area for ozone and PM<sub>10</sub>. Per guidelines set forth by the department of Housing and Urban Development (HUD), because the proposed project is in a non-attainment area for ozone and PM<sub>10</sub>, conformity with the State Implementation Plan (SIP) must be demonstrated. A project would comply with the SIP if it is deemed consistent with the local air quality management plan and its criteria pollutant emissions remain below the local air district's significance thresholds.</p> <p>SDAPCD developed a Regional Air Quality Strategy (RAQS) to achieve the state air quality standards for ozone, which include the criteria pollutants volatile organic compounds (VOCs) and oxides of nitrogen (NO<sub>x</sub>). Despite continued growth in population and motor vehicle use, San Diego's air quality has substantially improved over the last two decades as a result of emission control efforts and smart growth planning efforts.</p> <p>The proposed project would provide 100 affordable housing units. The project would be located adjacent to the MTS bus route along Imperial Avenue. Transit accessibility would minimize long-term air emissions associated with motor vehicle travel within the San Diego area. Further, as shown below, project construction and operational emissions would not exceed SDAPCD and City of San Diego daily standards. Thus, the project would be consistent with the RAQS and the SIP.</p> <p>As shown below, air emissions would be substantially below the City of San Diego significance thresholds.</p>
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<b>Operational Emissions Compared to Air Pollutant Thresholds</b>		
<b>Pollutant</b>	<b>Threshold (lbs/day)<sup>1</sup></b>	<b>Operational Emissions (lbs/day)</b>
ROG	137	5.9
NOx	100	2.0
Carbon Monoxide	550	23.1
SOx	250	0.04
PM <sub>10</sub>	100	3.4
PM <sub>2.5</sub>	67	0.9
Lead and Lead Compounds	3.2	N/A

<b>Project Construction Emissions Compared to Air Pollutant Thresholds</b>		
<b>Pollutant</b>	<b>Threshold (lbs/day)<sup>1</sup></b>	<b>Construction Emissions (lbs/day)<sup>2</sup></b>
<p>Construction-related activities associated with the proposed project would include excavation for the basement parking garage, removal of approximately 5,000 cubic yards of spoils, construction of the building, internal improvements, painting and worker transportation to and from the site. Construction was assumed to occur over a 13-month period beginning December 2026 through January 2028. These emissions would be incremental and temporary and not result in a conflict with, or obstruct the implementation of, applicable air quality plans, nor would they exceed SDAPCD construction thresholds established in Table A-2 of the City of San Diego's CEQA Significance Determination Thresholds. The CalEEMod 2022.1 air emissions model was used to estimate project related air pollutant concentrations during construction. The emissions reported are for the highest day that would occur during the construction cycle. As shown below, air emissions would be substantially below the City of San Diego significance thresholds.</p>		

		<table border="1"> <tr><td>ROG</td><td>137</td><td>16.3</td></tr> <tr><td>NOx</td><td>100</td><td>29.2</td></tr> <tr><td>Carbon Monoxide</td><td>550</td><td>29.4</td></tr> <tr><td>SOx</td><td>250</td><td>0.04</td></tr> <tr><td>PM<sub>10</sub></td><td>100</td><td>9.0</td></tr> <tr><td>PM<sub>2.5</sub></td><td>67</td><td>5.1</td></tr> <tr><td>Lead and Lead Compounds</td><td>3.2</td><td>N/A</td></tr> </table>	ROG	137	16.3	NOx	100	29.2	Carbon Monoxide	550	29.4	SOx	250	0.04	PM <sub>10</sub>	100	9.0	PM <sub>2.5</sub>	67	5.1	Lead and Lead Compounds	3.2	N/A
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Lead and Lead Compounds	3.2	N/A																					
<i>Source List: [a, e, aa]</i>																							
<b>Coastal Zone Management</b>  Coastal Zone Management Act, sections 307(c) & (d)	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	The project site is not located in a City of San Diego coastal overlay zone; and thus, is outside the Coastal Zone as defined by the California Coastal Act (Public Resources Code, Division 20, Section 3000 Et. Seq.). No Coastal Development Permit would be required. The project would have no adverse impact to a coastal zone.																					
<i>Source List: [a]</i>																							
<b>Contamination and Toxic Substances</b>  24 CFR Part 50.3(i) & 58.5(i)(2)	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	<p>The Phase I assessment prepared by Rincon Consultants, Inc. (February 2018), identified the following Recognized Environmental Conditions (RECs) on the project site:</p> <p><b>Recognized Environmental Conditions</b></p> <ol style="list-style-type: none"> <li>Former use of the subject property as a gasoline station; and</li> <li>Former use of the subject property as a drycleaner.</li> </ol> <p><b>Potential Recognized Environmental Conditions</b></p> <ol style="list-style-type: none"> <li>Former and current use of the subject property as automotive repair;</li> <li>Former use of the subject property as an Iron Works facility;</li> <li>Former adjacent and nearby drycleaners; and</li> <li>Possible lead in soil at the subject property.</li> </ol> <p><b>Unknown Environmental Condition</b></p> <ol style="list-style-type: none"> <li>Former adjacent and nearby gasoline stations</li> </ol> <p>To evaluate the potential subject property impact associated with the RECs and potential RECs</p>																					

	<p>identified above, Rincon recommends conducting a soil and soil vapor assessment at the subject property to assess potential impacts at the library, automotive repair facility, the former ironworks, the former gasoline station, and the former drycleaner.</p> <p>In addition, although not considered an REC, based on the age of the onsite structure(s) (constructed as early as 1953) asbestos-containing materials and lead-based paint may be present on the subject property. Therefore, Rincon recommends conducting an asbestos-containing building materials and lead-based paint survey for all the structures at the subject property.</p> <p>Based on the Phase I findings, a Phase II Environmental Site Assessment was prepared. As part of the Phase II, Rincon conducted a soil and soil vapor assessment and a geophysical survey to determine the locations of the former underground storage tanks (USTs) and associated piping. No USTs were identified on the subject property.</p> <p>Based on the results of this assessment, the following chemicals of concern are located onsite:</p> <ol style="list-style-type: none"> <li>1. Elevated concentrations of lead in the soil that will require disposal off-site as California Hazardous Waste;</li> <li>2. Elevated concentrations of total petroleum hydrocarbons as gasoline (TPHg) in the soil; and</li> <li>3. Elevated concentrations of tetrachloroethene (PCE).</li> </ol> <p>Based on the above findings, a Soil Management Plan (SMP) was prepared (Rincon Consultants, Inc., October 2023), to provide methods and recommendations for remediation of contaminated soil occurring on-site. This SMP is intended to be</p>
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	<p>used by the applicant and the construction team, including the General Contractor, and the qualified project Environmental Consultant (Consultant), providing services for the site development activities. Implementation of the SMP would reduce potential impacts caused by contaminated soils to less than significant.</p> <p>Three unresolved issues pertaining to former uses of the site were noted in the Phase II ESA. The following recommendations are summarized from the Phase II to be implemented at the applicant's discretion:</p> <ol style="list-style-type: none"> <li>1. Due to the limited assessment conducted for the former dry cleaning facility, further assessment of soil vapor is recommended to characterize the extent of impact that may be present at this location. Following additional subsurface assessment, a health risk assessment may be warranted.</li> <li>2. The location of a possible hoist was noted at 5020 Imperial Avenue. During grading and development activities at this property, the hoist area should be properly removed and assessed.</li> <li>3. Although current USTs were not identified onsite at the former gasoline station and dry cleaning facility, proper Agency removal/abandonment paperwork for the former gasoline station USTs has not been located. It is recommend that the local fire department and the San Diego Department of Environmental Health be contacted to obtain proper removal/abandonment paperwork for the former gas station USTs.</li> </ol> <p>Per the January 2024 HUD Notice CPD-23-103, the project site was evaluated for radon potential. As stated in the Phase I ESA, the U.S. Environmental Protection Agency radon map shows the site is</p>
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		located in an area of low radon potential. Indoor concentrations are predicted to be less than 2 picocuries per liter (pCi/L), a unit used to measure the concentration of radon gas in the air. The U.S. Environmental Protection Agency recommends that homes be mitigated if radon levels are at or above 4 pCi/L. The California Department of Conservation Radon Mapping Tool shows the project site is outside a defined Radon Study Area. No further work would be required to address radon post-construction.
		<i>Source List: [f, g, h, ee, gg, ll]</i>
<b>Endangered Species</b>  Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	The project site is developed and consists of residential and commercial buildings, asphalt concrete parking areas and ornamental landscaping. The empty lots contain weeds/ruderal species and patches of remnant turf grass. It does not contain environmentally sensitive land (ESL) where sensitive species may be present and is not adjacent to Multi-Habitat Planning Area (MHPA). The closest MHPA is approximately 4,200 feet east of the project site within the Valencia Canyon open space and is separated from the project site by urban development. No federally, State or MHPA listed plant or wildlife species or their habitat was observed on-site. A "No Effect" determination is warranted and implementation of the proposed project will not result in direct or indirect impacts to federally, State, or Multiple Species Conservation Plan (MSCP) covered species. Additionally, the project will not impact designated Critical Habitats or regional wildlife movement corridors/linkages.
		<i>Source List: [a, q, s]</i>
<b>Explosive and Flammable Hazards</b>  24 CFR Part 51 Subpart C	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	The proposed project is a residential project designed to provide affordable housing for income qualifying tenants. The project would not require the ongoing use, storage or routine transport of hazardous, explosive or flammable materials. Aside from common household chemicals, no

		<p>hazardous materials would be used on-site. The project would not emit or release hazardous waste or emissions.</p> <p>The California Environmental Protection Agency (CalEPA) regulated site portal (<a href="https://siteportal.calepa.ca.gov/nsite/map/help">https://siteportal.calepa.ca.gov/nsite/map/help</a>) was used to identify the presence of any regulated sites within one mile of the site that would present a potential hazard to the project site. A total of 858 records were identified. The sites are comprised of underground storage tanks associated with retail fueling stations, retailers selling motor oil and other automotive related products, automotive dealers, school sites, stormwater treatment facilities and hazardous waste generators (i.e., heavy commercial/light industrial facilities). No above ground tanks for the storage of petroleum or other potentially explosive chemicals occur within the one-mile search radius. Exposure to significant hazards at the site would be less than significant.</p> <p><i>Source List: [z, ee]</i></p>
<p><b>Farmlands Protection</b></p> <p>Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658</p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>	<p>The project site is developed. The site is zoned CN-1-3. The site is categorized as Urban and Built-Up Land, as indicated on the State Farmland Mapping and Monitoring Program maps for the County of San Diego. The site does not include prime or unique farmland, or other farmland of statewide or local importance. No impact to farmland resources defined under the Farmland Protection Policy Act per 7 CFR 658 would occur.</p> <p><i>Source List: [a, k]</i></p>
<p><b>Floodplain Management</b></p> <p>Executive Order 11988, particularly section 2(a); 24 CFR Part 55</p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>	<p>All federally funded development projects are evaluated per Executive 11988 as discussed below. Those occurring in mapped flood zones require evaluation consistent with Part II of EO 11988.</p> <p>The site is designated Flood Zone X, which indicates the site is outside a flood zone per Flood Insurance Rate Map (FIRM) 06073C1904G, prepared May 16, 2012. No floodplain</p>

		<p>management issues are associated with the site. No impacts would occur under this threshold.</p> <p><i>Source List: [o]</i></p>
<p><b>Historic Preservation</b></p> <p>National Historic Preservation Act of 1966, particularly Sections 106 and 110; 36 CFR Part 800</p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>	<p>Information and findings in this section are based on the Historic Properties eligibility determination in the Project Issues Report (City of San Diego, February 2022) and the Cultural Resource Assessment prepared by South Environmental, LLC, (December 2025). The work included delineation of an Area of Potential Effect (APE), a California Historical Resources Information System (CHRIS) records search at the South Coastal Information Center (SCIC), Native American outreach, archival and background research, and an intensive pedestrian survey.</p> <p>No historic properties (either archaeological or historic built environment) were identified within the project APE as a result of the CHRIS records search, NAHC Sacred Lands File search, archival research, or pedestrian survey by a qualified archaeologist.</p> <p>Further, as determined by the City of San Diego, the property located at 5020 Imperial Avenue is not an individually designated resource and is not located within a designated historic district. The property does not meet local designation criteria as an individually significant resource under any adopted Historical Resources Board Criteria. Therefore, no historical research report required.</p> <p>South Environmental, Inc., recommends a finding of no historic properties affected for the proposed undertaking.</p> <p>With respect to archaeological resources, on December 16, 2025, South Environmental conducted an in-person cultural resources records search of the project site and a 0.5-mile search radius at the South Coastal Information Center (SCIC), which houses cultural resources records</p>

	<p>for San Diego County. The records search results indicate that 38 previously conducted cultural resource studies were completed within 0.5-mile of the project APE. One of these studies (SD-12520) is mapped as overlapping the project APE. The remaining 37 studies are outside the APE. The study formally evaluated 16 buildings and recommended 14 of the 16 buildings as ineligible for City or California Register of Historic Places listing. None were located in the APE.</p> <p>On December 10, 2025, the California Native American Heritage Commission (NAHC) provided Sacred Lands File Search results. The results of the search were negative (i.e., no resources important to local tribes were identified in the project vicinity). The NAHC provided a list of 17 contacts who may have knowledge of cultural resources in or near to the project site and should be contacted for additional information. South Environmental sent informational outreach letters to the 17 Native American contacts on December 2, 2025, and completed additional inquiries on December 23, 2025.</p> <p>One response was received from the Barona Group of the Capitan Grande requesting a standard cultural resources study be performed by a qualified archaeologist. A letter of response was sent to the San Diego Housing Commission by the Pala Band of Mission Indians on November 17, 2025. In the letter, the Tribe states that the project site is neither within the Pala Indian Reservation nor within the Tribes' Traditional Use Area. However, the Tribe requests to be kept informed of the project's progress. No other tribal responses were received.</p> <p>A pedestrian survey was conducted on December 12, 2025. No archaeological resources were identified within the project APE. Therefore, the project APE is unlikely to contain intact buried archaeological deposits; however, ground</p>
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	<p>disturbance always presents a possibility of encountering resources. Standard unanticipated discovery measures for archaeological resources and human remains are provided below.</p> <ul style="list-style-type: none"> <li>▪ Should archaeological resources (sites, features, or artifacts) be exposed during construction activities for the proposed project, all construction work occurring within 100 feet of the find shall immediately stop until a qualified archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards, can evaluate the significance of the find and determine whether or not additional study is warranted. Depending upon the significance of the find, the archaeologist may simply record the find and allow work to continue. If the discovery proves significant under Section 106 of the NHPA, additional work such as preparation of an archaeological treatment plan, testing, or data recovery may be warranted.</li> <li>▪ If human remains are found, existing regulations outlined in the State of California Health and Safety Code Section 7050.5 state that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. In the event of an unanticipated discovery of human remains, the County Coroner must be notified within 24 hours of positive identification as human. If the human remains are determined to be prehistoric, the Coroner will notify the NAHC, which will determine and notify a most likely descendant (MLD). The MLD shall complete the inspection of the site within 48 hours of being granted access and provide recommendations as to the treatment of the remains to the landowner.</li> </ul> <p><i>Source List: [a, j]</i></p>
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<p><b>Noise Abatement and Control</b></p> <p>Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B</p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>	<p><i>Construction</i></p> <p>The proposed project would generate short-term noise during project construction primarily during use of heavy equipment for demolition, site preparation and grading/excavation (cut/fill). This would include truck traffic associated with material hauling, delivery/staging. As shown in the table below, maximum noise levels related to construction is typically in the 85 A-weighted decibels (dBA) at a distance of 25 feet.</p> <p><b>Typical Noise Levels at Construction Sites</b></p> <table border="1" data-bbox="882 671 1437 1115"> <thead> <tr> <th>Construction Phase</th><th>Average Noise Level at 25 Feet</th></tr> </thead> <tbody> <tr> <td>Clearing</td><td>84 dBA</td></tr> <tr> <td>Excavation</td><td>85 dBA</td></tr> <tr> <td>Foundation/Conditioning</td><td>85 dBA</td></tr> <tr> <td>Laying Sub-base/Paving</td><td>81 dBA</td></tr> <tr> <td>Finishing</td><td>84 dBA</td></tr> <tr> <td colspan="2">FTA, 2018</td></tr> </tbody> </table> <p>Project construction would be required to comply with the City of San Diego's Noise Abatement and Control Ordinance (Municipal Code Section 59.5.01), which limits construction noise from 7am to 7pm, Monday through Saturday and construction noise levels to 75 dBA over the construction day. Construction is not permitted on Sundays and holidays.</p> <p>Construction activities would occur per the City of San Diego's Noise Ordinance; however, noise levels could exceed the exterior standard of 75 dBA over a 12-hour construction day. With implementation of a construction noise plan required as a standard condition by the City of San Diego, no adverse impacts related to construction noise are anticipated.</p> <p><i>Operation</i></p>	Construction Phase	Average Noise Level at 25 Feet	Clearing	84 dBA	Excavation	85 dBA	Foundation/Conditioning	85 dBA	Laying Sub-base/Paving	81 dBA	Finishing	84 dBA	FTA, 2018	
Construction Phase	Average Noise Level at 25 Feet															
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	<p>The proposed project would generate approximately 600 daily trips (six daily trips per unit). As a general rule of thumb, the doubling of a noise source would lead to a doubling of noise levels, which corresponds to an increase of 3 dBA. The primary point of ingress/egress would be from the 50<sup>th</sup> Street intersection with Imperial Avenue. The most recent traffic counts for the segment of Imperial Avenue between 53<sup>rd</sup> and 54<sup>th</sup> Street, three blocks east of the site (2017) adjusted by two percent annually to estimate current volumes, would be approximately 24,152 daily trips or 2,415 peak hour trips</p> <p>Using the HUD DNL Calculator, baseline traffic noise levels along the southern site boundary are approximately 64 dBA CNEL on the project site. The addition of 600 daily project trips would have no effect on noise levels along Imperial Avenue. Traffic noise associated with the project would be less than significant. Exterior noise levels would remain below the HUD 65 dBA DNL (24-hour average) threshold.</p> <p>The interior noise standard is 45 dBA CNEL. Interior noise levels are estimated using exterior noise levels as the baseline and subtracting the typical insertion loss or attenuation achieved by adhering to Title 24 of the California Building Code. The insertion loss associated with the sound reduction properties of proposed exterior walls, window, and door construction design can range from 25 to 30 dBA with doors and windows closed. Using the estimated noise level of 64 dBA CNEL as the baseline exterior noise level, an insertion loss of 25 to 30 dBA would reduce exterior noise levels to between 34 dBA and 39 dBA CNEL at the units facing Imperial Avenue which would meet the interior noise standard. No adverse interior noise impacts are identified.</p> <p>The closest airports to the project site are San Diego International Airport, located approximately 7.2</p>
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		<p>miles to the west/northwest. The project site is within the 60 dB CNEL contour as shown on Exhibit 2-1, Noise Contour Map of the San Diego International ALUCP. The project site is not within the noise contours for other airports in the region. The existing airport CNEL does not exceed the HUD 65 dBA CNEL residential exterior standard. Therefore, the project would not expose people residing or working in the area to excessive noise levels and impacts would be less than significant.</p> <p><i>Source List: [a, b, c, cc, kk]</i></p>
<b>Sole Source Aquifers</b>  Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	<p>The project site is not located within an area supported by a sole source aquifer. Sole source aquifers are defined and designated under the provisions of Section 1424(e) of the federal Safe Drinking Water Act. There are no such designated aquifers within the City of San Diego. According to the sole source aquifer maps maintained by the Environmental Protection Agency, the nearest aquifer is in the Campo area of San Diego County, more than 39 miles southeast of the project site. Therefore, no adverse impacts related to sole source aquifers are anticipated.</p> <p><i>Source List: [r]</i></p>
<b>Wetlands Protection</b>  Executive Order 11990, particularly sections 2 and 5	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	<p>The site is developed and within a heavily urbanized area. According to the U.S. Fish and Wildlife Service's Wetlands Online Mapper, no wetlands are located on or immediately adjacent to the project site. No adverse impacts related to wetlands protection are anticipated.</p> <p><i>Source List: [q]</i></p>
<b>Wild and Scenic Rivers</b>  Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	<p>The project site is located approximately 5.0 miles south of the San Diego River corridor. The San Diego River is not designated wild or scenic. (National Wild and Scenic Rivers, 2011). The project would have no adverse impacts on wild or scenic rivers.</p> <p><i>Source List: [p]</i></p>
<b>ENVIRONMENTAL JUSTICE</b>		

<b>Environmental Justice</b> Executive Order 12898	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	<p>The project would provide 100 affordable apartment units for income qualifying families and individuals. The project would require the demolition of commercial buildings and two residential buildings. All buildings are vacant and would be demolished to accommodate the project. Neighboring uses are comprised of single and multi-family residences to the north, single-family residences to the east and west and a mixed-use commercial and residential building to the south across Imperial Avenue. The site and surrounding property is zoned CN 1-3. The proposed project is allowed outright in the CN 1-3 zone. The site is not of any biological or cultural significance. The project is not known to be located in an area subject to climate change nor would affects from climate change disproportionately impact low income or minority populations. No hazards or hazardous materials impacts requiring mitigation are associated with the project.</p> <p>As reported in the draft City of San Diego Housing Element 2021-2029, the projected housing need obligation for the planning period is 108,036 total units. Of these units, the City of San Diego will need to accommodate 27,549 low to extremely low-income housing units. The project would contribute to the City of San Diego affordable housing allocation.</p> <p>As discussed in the City of San Diego General Plan Environmental Justice Element (July 2024), the CalEnviroScreen Tool 4.0 developed by the California Office of Environmental Health Hazard Assessment is a screening tool used to identify California communities disproportionately burdened by multiple sources of pollution. The tool utilizes environmental, health, and socioeconomic information to score every census tract in the state to inform pollution burdens. Communities in the top 25% of the CalEnviroScreen 4.0 tool and at or below the state</p>
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		<p>average median income are represented in EJ Communities. According to the CalEnviroScreen 4.0 tool, the site and surrounding properties in Census Tract 6073003304, are within the 60-70<sup>th</sup> percentile which means the area experiences an above average pollution burden. The area ranks higher than average for diesel particulates, groundwater threats and the presence of hazardous waste sites and solid waste. The overall pollution burden is in the 67<sup>th</sup> percentile. The project site is located within a SB 535 Disadvantaged Community.</p> <p>There is no evidence based on project scope and location of the proposed project, that any populations with limited housing choices or that otherwise are considered to have special life challenges would be adversely affected by the project. Further, to date, no public comment known to the applicant, either in favor of or opposing the project because of potential environmental justice concerns, has been received.</p> <p><i>Source List: [a, f, g, h, i, j, s, w]</i></p>
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**Environmental Assessment Factors** [24 CFR 58.40; Ref. 40 CFR 1508.8 &1508.27] Recorded below is the qualitative and quantitative significance of the effects of the proposal on the character, features and resources of the project area. Each factor has been evaluated and documented, as appropriate and in proportion to its relevance to the proposed action. Verifiable source documentation has been provided and described in support of each determination, as appropriate. Credible, traceable and supportive source documentation for each authority has been provided. Where applicable, the necessary reviews or consultations have been completed and applicable permits or approvals have been obtained or noted. Citations, dates/names/titles of contacts, and page references are clear. Additional documentation is attached, as appropriate. **All conditions, attenuation or mitigation measures have been clearly identified.**

**Impact Codes:** Use an impact code from the following list to make the determination of impact for each factor.

- (1) Minor beneficial impact
- (2) No impact anticipated
- (3) Minor Adverse Impact – May require mitigation

(4) Significant or potentially significant impact requiring avoidance or modification which may require an Environmental Impact Statement

Environmental Assessment Factor	Impact Code	Impact Evaluation
<b>LAND DEVELOPMENT</b>		
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	2	<p>The project site is designated Multiple Use in the General Plan Land Use Element (July 2024) and zoned CN-1-3. The site is located within the Encanto Neighborhoods Community Planning Area and designated Mixed Use Neighborhoods Low with a residential density of 15 to 29 units per acre. The purpose of the CN-1-3 designation is to provide residential areas with access to a limited number of convenient retail and personal service uses.</p> <p>The project proposes the construction of 100 multi-family affordable housing units. The project is within a Transit Priority Area and San Diego Complete Communities. Because the project is 100% affordable, density is unlimited.</p> <p>The project does not propose any changes to the existing land use designation or zoning of the project site. The project would not conflict with the adopted land use designation or intended intensity of the project site.</p> <p>With respect to scale and urban design, the project building would be taller than surrounding structures which are primarily single-story commercial buildings and one- and two-story residences. The mixed-use building across Imperial Avenue to the south is a contemporary three-story building. The proposed building would not be out of context with newer urban development within the Encanto Neighborhoods Community Plan area. The project has been designed consistent with city standards and design guidelines; and would provide an overall visual improvement relative to existing on-site conditions.</p> <p><i>Source List: [a, y, aa, jj]</i></p>

Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff	2	<p><b>Soils.</b> As reported in the Geotechnical Investigation prepared by NOVA Services (2021), the site is underlain by fill and older alluvium to the maximum depth explored of 26.5 feet below ground surface (bgs). Fill was generally encountered in the top 5.5 feet bgs; however, fill was not encountered in one geotechnical boring advanced along Imperial Avenue on the eastern portion of the site. The fill was described as “loose to medium dense clayey sand and soft to medium stiff clay with varying amounts of gravel.” Older alluvium was described as “medium dense to very dense silty and clayey sand and very stiff to hard clays with varying amounts of gravel.</p> <p>According to the project plans, the project involves maximum cuts to a depth of approximately 13 feet bgs and maximum filling to 6 feet bgs. The majority of the cuts will take place at the central and eastern portions of the underground parking garage footprint and the two elevator pits. The southwestern corner of the site will require filling with approximately 6 feet of soil. The northeastern corner of the site will require filling with approximately 3 feet of soil. Areas of minor grading (i.e., plus or minus approximately 1 foot) will be required in various other locations across the site. With recommendations regarding soil placement and preparation, the soil underlying the project site will be suitable for supporting the proposed project.</p> <p><b>Slope Erosion.</b> The site is flat and primarily covered in asphalt, concrete and buildings. The vacant lots are covered in patches of turf and ruderal/weedy species. This limits erosion potential. The project would construct 100 affordable housing units with related improvements. No new slopes would be created as a result of project construction.</p> <p><b>Stormwater Runoff.</b> In the current condition, runoff from offsite is not conveyed through the site. The existing drainage for the project site is split up into two basins. The western basin sheet flows south to north to the ribbon gutter in the alley and discharges to 50th Street. The eastern basin sheet flows south to north into an existing canyon. The project proposes to capture roof runoff via</p>
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		<p>downspouts into adjacent above ground biofiltration planters that then outlet to the street. Runoff on the eastern portion of the site will be captured via brow ditch and discharge to the northeastern corner to the canyon similarly to existing conditions.</p> <p>During construction, the project would be required to comply with the City's Storm Water Management and Discharge Control Ordinance (San Diego Municipal Code Section 43.03) and the NPDES Construction General Permit both of which require the implementation of Best Management Practices (BMPs) to reduce pollutants in the stormwater to the maximum extent practicable. Typical construction-related BMPs include temporary soil stabilization (e.g., straw mulch, wood mulch, drainage swales), temporary sediment control (e.g., silt fence, sediment track, fiber rolls, sandbag barrier), de-watering, vehicle equipment maintenance and cleaning, and tire cleaning. Compliance with the applicable standards would ensure that the project does not adversely affect water quality.</p> <p><i>Source List: [ii, mm]</i></p>
Hazards and Nuisances including Site Safety and Noise	2	<p><b>Hazards and Nuisances.</b> The proposed project is a new 100-unit affordable housing project. It would not require the ongoing use, storage or routine transport of hazardous materials. Aside from common household chemicals, no hazardous materials would be used on-site. The project would not emit or release hazardous waste or emissions. As stated, multiple REC's were identified on-site and methods to remediate on-site soils were provided in the Soil Management Plan.</p> <p>The project site would be constructed consistent with current City of San Diego requirements for fencing, lighting and landscaping features related to site safety. No impacts related to hazards, nuisance or site safety would occur.</p> <p>Regarding noise, construction activities would occur per the City of San Diego's Noise Ordinance; however, noise levels could exceed the exterior standard of 75 dBA over a 12-hour construction day. With implementation of a</p>

		<p>construction noise plan required as a standard condition by the City of San Diego, temporary construction noise impacts would be less than significant. During operation, the proposed project would not be exposed to exterior noise levels that currently exceed acceptable limits within the City of San Diego code.</p> <p><i>Source List: [a, f, g, h, aa, bb, cc, ee, gg, ]</i></p>
Energy Consumption	2	<p>Neither construction nor operation of the project would require significant amounts of energy. During construction, the proposed project would require the use both gasoline and diesel fuel and electricity to power the construction equipment. However, this energy consumption would be short-term and temporary and would not have adverse impacts on long-term energy consumption for the overall housing complex. The proposed project would meet the energy standards outlined in the California Building Code, Title 24 Energy Efficiency Standards. Therefore, no adverse energy consumption impacts would occur.</p> <p><i>Source List: [a, x]</i></p>

Environmental Assessment Factor	Impact Code	Impact Evaluation
<b>SOCIOECONOMIC</b>		
Employment and Income Patterns	1	<p>During construction, the project would generate temporary employment opportunities. These jobs would not substantially affect overall employment patterns in the city. Operation of the project would require building management staff and require case management and related services provided by a third-party vendor. The number of jobs would not substantively increase employment opportunities in the city; however, new jobs would be a minor benefit associated with the proposed project.</p> <p><i>Source List: [a]</i></p>
Demographic Character Changes, Displacement	1	<p>The proposed project would develop 100 affordable housing units and related improvements. The site is currently occupied by three vacant commercial buildings and two vacant residential buildings, a parking lot and landscaping. Construction would be primarily confined to</p>

		<p>the project site. A temporary lane closure may be required to construct ingress/egress improvements along 50<sup>th</sup> Street. However, project parking would occur on-site and traffic volumes would not adversely affect traffic operations on 50<sup>th</sup> Street or Imperial Avenue. As stated, the residential buildings are vacant; thus, the project would not displace existing residents or otherwise conflict with the overall character of the project area.</p> <p><i>Source List: [a]</i></p>
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Environmental Assessment Factor	Impact Code	Impact Evaluation
<b>COMMUNITY FACILITIES AND SERVICES</b>		
Educational and Cultural Facilities	1	<p>The school nearest the site is Lincoln High School which is located one block west of the site. Porter Elementary School is located at 445 South 47<sup>th</sup> Street which is approximately 0.2 miles southwest of the site. The City of San Diego provides library and related cultural services to its residents through the Public Library System. The nearest library is the Valencia Park/Malcolm X Branch Library located at 5148 Market Street approximately one-half mile northeast of the site.</p> <p>The project is comprised of 100 units and may house school-age children. Using the San Diego Unified School District (SDUSD) student generation rate of .344 student per multifamily residence, the number of school age children living at the property is conservatively estimated to be 34. Payment of impact fees by the applicant would contribute fair share funds needed to expand school capacity as needed to address future capacity constraints.</p> <p>With respect to library services, it is possible that residents may visit the library; however, the addition of approximately 278 residents would not exceed the service population to the extent that new library facilities are required. The project would provide on-site computer services and related resources which would reduce demand on existing library services. Furthermore, a portion of the impact fees paid by the applicant will be allocated to the expansion of library facilities.</p>

		<i>Source List: [a]</i>
Commercial Facilities	2	<p>Commercial services, retail and grocery stores are located proximal to the site along Imperial Avenue and to the north along Euclid Avenue. The need for goods and services required by approximately 278 new residents would be met by existing businesses within the area. No adverse impact to commercial facilities would occur as a result of the project.</p> <p><i>Source List: [a]</i></p>
Health Care and Social Services	1	<p>The proposed project would provide new residential units to serve families. It is assumed the residents are currently residing in the San Diego area. The project is expected to accommodate approximately 278 new residents. This would not increase the general population to the degree that expanded health care services would be required in San Diego. Multiple urgent care clinics are located in proximity to the site. The Imperial Avenue Health Center is located at 2121 Imperial Avenue approximately three miles west of the site. No adverse impacts related to health care are anticipated.</p> <p>The project would provide limited social services on-site; however, as noted, it is expected that the residents currently live in the San Diego area. While on-site services may benefit residents, it may also relieve demand on existing social services. No impact to existing social services is expected.</p> <p><i>Source List: [a]</i></p>
Solid Waste Disposal / Recycling	2	<p>Construction activities would temporarily generate solid waste in the form of construction debris (e.g., drywall, asphalt, lumber, and concrete) and operational activities such as household waste associated with a residential living facility. Demolition of the existing buildings, parking spaces and additional site clearing and preparation work would generate demolition waste. Per City of San Diego Requirements for Recycling and Disposal of Construction and Demolition Debris information bulletin, a Waste Management Plan (WMP) would be required for demolition if remaining demolition debris would exceed 40,000 square feet. The exact volume of demolition waste is unknown; however, the 1.35-acre site would be vacant</p>

		<p>at the time the proposed project is developed. No WMP would be required. The contractor would be required to comply with the City of San Diego Construction Demolition and Debris Deposit Ordinance (SDMC §66.0601– 66.0610). This program is intended to increase the diversion of construction and demolition debris from landfill disposal, conserve the capacity and extend the useful life of the Miramar Landfill, and avoid the potential financial and other consequences to the City associated with failing to remain in compliance with AB 939 requirements. The contractor would pay a refundable deposit at the time the Building Permit or Demolition/Removal Permit is issued to facilitate compliance with the Construction Demolition and Debris Ordinance.</p> <p>The Miramar Landfill is the only operational landfill in the City of San Diego and the most likely repository of solid waste generated by the project. The project is projected to generate 37 tons of solid waste annually (202 pounds daily) that would be landfilled assuming 50 percent is recycled as required per AB 939. The landfill is permitted to accept 8,000 tons of solid waste daily and has a remaining capacity of 11,080,871 tons. During typical operations, approximately 3,900 tons of waste are landfilled daily. The addition of 202 pounds daily would be a negligible increase in daily volumes landfilled.</p> <p><i>Source List: [a, e, t, u, v]</i></p>
Waste Water / Sanitary Sewers	2	<p>Wastewater demand for the new residential units would be met with existing capacity available in the sewer conveyance and treatment system. Sewer trunk lines are continually monitored in the field to determine remaining capacity.</p> <p>The project would connect all new wastewater lines to the existing sewer system. Prior to issuance of building permits, wastewater impact fees would be paid to the City to cover fair share costs associated with adequate wastewater conveyance, treatment and disposal. No adverse impacts would occur.</p> <p><i>Source List: [a, u, aa]</i></p>

Water Supply	2	<p>The project would utilize existing water connections servicing the site. The project is subject to water fees that would be paid by the applicant prior to receipt of a building permit. Based on the scale of the proposed action, no new or expanded water connections, water treatment or conveyance facilities would be required for the project.</p> <p>The project would provide less than 500 residential units; thus, the project would be below the mandated threshold for preparing a project-specific Water Supply Assessment pursuant to California Water Code §10910-10915.</p> <p><i>Source List: [a, aa]</i></p>
Public Safety - Police, Fire and Emergency Medical	2	<p>The San Diego Fire Department provides fire protection, paramedic and emergency medical technician services to the project site. Fire Station 12 is located at 4964 Imperial Avenue and is the closest station to the site. It is located one block west of the project site. The project area is served by the San Diego Police Department Southeastern Division. The station is located at 5555 Reservoir Drive, approximately 5.2 miles northeast of the project site.</p> <p>While the project would increase the residential population within the Encanto Neighborhoods Community Planning Area, it would not do so at a scale that would generate the need for new police, fire, or emergency medical services to be constructed. The proposed project may increase demand for fire services or police protection services relative to uses that may have occurred on the site; however, not to the extent that new facilities would be required.</p> <p><i>Source List: [m]</i></p>
Parks, Open Space and Recreation	2	<p>The project would not increase demand for recreational facilities such that existing facilities would be adversely affected. The project would provide 100 affordable housing units for income-qualifying residents. A vocation room would be provided along with outdoor amenities which would provide some recreational benefit. The site is located within a developed residential and commercial area. John F. Kennedy Neighborhood Park is located approximately 0.4 miles southwest of the site. The project would be required to contribute proportionate impact fees to the construction of park and recreational facilities. With</p>

		<p>payment of development impact fees (DIFs), no adverse impacts to parks and recreation facilities associated with the project would occur.</p> <p><i>Source List: [a]</i></p>
Transportation and Accessibility	2	<p>Project construction and material staging would occur on the project site. There would be on-site construction worker parking; however, traffic control measures may be required temporarily to allow vehicles to safely enter and exit the site. Construction may also require modifications to the driveway to facilitate ingress/egress. A temporary lane closure along the frontage may be required to construct these improvements.</p> <p>The site is located within a transit priority area. MTS bus Route 4 is located along Imperial Avenue. There is an existing stop fronting the south side of the project site.</p> <p>Projects that meet one of the screening criteria within the City's Transportation Study Manual are considered to have a less than significant impact related to vehicle miles traveled (VMT). The project proposes a 100-percent affordable housing development and is consistent with the affordable housing screening criteria provided by the City of San Diego given its proximity to public transit options. Therefore, the project is screened out of detailed VMT analysis and would not result in significant impacts related to VMT.</p> <p>According to Walkscore.com, the site has a walkability score of 77 which indicates the site is located in a very walkable area. The site has a transit score of 59 which indicates good access to transit. The site has a bike score of 50 which indicates there is some bicycle infrastructure in the area and that the site is bikeable.</p> <p>No planned improvements to public transit, bicycle, or pedestrian facilities are proposed in the project vicinity. Therefore, the project would not conflict with any alternative transportation facilities. The project would provide bicycle parking facilities for use by residents and the public. The project would not have a significant impact</p>

		on active transportation or public transit in the vicinity of the project site.
<i>Source List: [a, n, dd, ff]</i>		

Environmental Assessment Factor	Impact Code	Impact Evaluation
<b>NATURAL FEATURES</b>		
Unique Natural Features, Water Resources	2	The proposed project site is located within a heavily urbanized area within the Encanto Neighborhoods Community Planning Area of San Diego. The project site is disturbed as a result of previous development of three commercial and buildings and two residences. There are no unique natural features or water resources occurring on the project site.  <i>Source List: [a, q, s, jj]</i>
Vegetation, Wildlife	2	The project area is heavily urbanized and site is developed with an existing building and parking. There are no sensitive plants or animal species, habitats, or wildlife migration corridors in the area, or on-site. The only wildlife species observed are common birds. No local species would be adversely affected by the project.  <i>Source List: [a, q, s, jj]</i>
Other Factors	2	<b>Climate Change.</b> The project site is located within the San Diego Air Basin, which is under the jurisdiction of the San Diego Air Pollution Control District (SDAPCD). The SDAPCD has not formally adopted thresholds for Greenhouse Gas emissions; thus, completion of the City of San Diego Climate Action Plan Consistency Checklist demonstrates that the project would be consistent with applicable strategies and actions for reducing greenhouse gas emissions. This includes project features consistent with the energy and water efficient buildings strategy, as well as bicycling, walking, transit, and land use strategy. The project would include roofing materials with a minimum three-year aged solar reflection and thermal emittance per CALGreen Regulations. The project would include plumbing fixtures with restricted maximum flow rates to save water. The project would include approximately 14 bicycle spaces and six motorcycle stalls.

	<p>Because the project is located within a transit priority area and adjacent to MTS Bus Route 4, limited parking is required. A total of 34 spaces would be provided on-site.</p> <p>As stated, the project is consistent with the existing residential uses allowed in the CN-1-3 zone. The applicant would implement strategies and actions for reducing GHG emissions required to demonstrate consistency with the City's CAP Consistency Checklist and CAP assumptions. The project would not generate GHG emissions, either directly or indirectly, that would have a significant impact on the environment, and impacts would be less than significant.</p> <p>The project site is not located within the coastal overlay zone and proximal to coastal areas. As shown in the National Oceanic and Atmospheric Administration Sea Level Rise Viewer, the project site is not in an area subject to sea level rise. Further the project site is not located near wildland areas that may be subject to wildfire or other natural conditions that could be affected by climate change.</p> <p><b>Energy.</b> Project construction would utilize common methods for site preparation, grading and installation of all infrastructure. Construction vehicles and equipment would utilize fossil fuels such as gasoline, diesel fuel, and motor oil. However, construction would be short-term and temporary. The project is not anticipated to include any unique features or construction techniques that would generate high energy demand or be wasteful or otherwise result in inefficient use of fuels or other sources of energy. The project would conform with all state and local requirements regarding construction-related energy use, including anti-idling regulations.</p> <p>The project would be required to comply with California Energy Code Title 24 requirements. Further, the project would implement water conservation strategies focused on achieving the goals set forth by Senate Bill X7-7 (2009) which mandates a statewide 20% per capita reduction in water consumption by 2020. The proposed project will have to meet Title 24 energy requirements and comply</p>
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		<p>with California Building Code's (CBC) Zero Net Energy requirements if in effect at time of building permit issuance. The installation of EnergyStar appliances, be required as a condition of approval.</p> <p>The project would comply with applicable elements of state and local plans through the implementation of measures addressing energy efficient design, water conservation and related features that reduce energy demand. While the project would increase demand for public utilities in the region; for reasons stated above, this would not represent a significant impact with respect to energy consumption.</p> <p><i>Source List: [a, x, ee, hh]</i></p>
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**Additional Studies Performed:** The following additional studies were performed:

- Air Quality and Greenhouse Gas Emissions Calculations, Birdseye Planning Group, November 2025;
- Phase I Environmental Site Assessment, 101 50th Street and 5020-5044 Imperial Avenue, San Diego, California, February 2018
- Phase II Environmental Site Assessment, 101 50th Street and 5020-5044 Imperial Avenue, San Diego, California, June 2018
- Soil Management Plan, 101 50th Street and 5020-5044 Imperial Avenue, San Diego, California, October 2023
- Section 106 Cultural Resources Report, South Environmental, Inc., December 2025

**Field Inspection** (Date and completed by): South Environmental, Inc., field inspection and archaeological survey, December 2025

**List of Sources, Agencies and Persons Consulted** [40 CFR 1508.9(b)]:

- a. MAAC, Inc. Project Materials.
- b. San Diego International Airport Land Use Compatibility Plan, April 2014
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**List of Permits Obtained:** The following permits and/or discretionary actions will be obtained by the project applicant:

- City of San Diego Site Development Permit;

**Public Outreach** [24 CFR 50.23 & 58.43]: Tribal outreach was performed during preparation of the Section 106 Cultural Resource Assessment. The project results in a Finding of No Significant Impact (FONSI) which will be published on the City Planning Department website at: <https://www.sandiego.gov/ceqa/draft> for access by public agencies; tribes already contacted, landowners/occupants of parcels located within the APE and any other interested parties. The FONSI Notice will include information about where the public may find the Environmental Review Record pertinent to the proposed Project.

**Cumulative Impact Analysis** [24 CFR 58.32]: The project proposes to construct one new multifamily residential building on a 1.35-acre site located at the northeast corner of 50<sup>th</sup> Street and Imperial Avenue. The building would have a five- and four-story component designed in a u-shaped configuration. The five-story portion of the building would be located on the northern portion of the site and have one below grade basement level containing 34 parking stalls, motorcycle and bicycle parking (20 spaces total), bicycle repair shop, trash room, mechanical room and related components. A total of one accessible parking space, one accessible van space, one Electric Vehicle (EV) accessible van space and three EV parking stalls would be provided. The four-story portion of the building would front Imperial Avenue. The project would provide a total of 100 units.

The five-story portion of the building would be a maximum of 46' 5 1/2" with a 3' 6" parapet. The four-story portion of the building would be a 37' 2" with a 3' 6" parapet. Primary building access would be from 50<sup>th</sup> Street on the west side. Vehicles would enter the basement parking garage via a two-access driveway. Pedestrian access to the lobby/management office (1,567 square feet), television room (218 square feet) and vocation room (1,172 square feet) would be located on the west side of the building on the ground floor. Amenities would include a residential courtyard/patio, a roof deck on level three of the four-story portion of the building and a play area. The overall building footprint would be 28,750 square feet with a total building area of 86,046 square feet. The project would provide full height curb, gutter, and sidewalk along both frontages. The project is proposed to be constructed in one phase, with construction assumed to be completed in 2027. The project would connect to existing electrical, water, and sewer utility infrastructure.

The project would provide 100 units comprised of 68 two-bedroom units and 32 three-bedroom units. One unit would be reserved for an on-site manager. The two-bedroom units would be an average of 787 square feet; the three-bedroom units would be an average of 1,044 square feet. Of the total, one three-bedroom unit would be reserved for an on-site manager. A total of 19 units would be allocated to tenants at 80 percent Area Median Income (AMI), 58 units would be allocated to tenants at 60 percent of AMI; 11 units would be allocated to tenants at 50 percent AMI and 11 units would be allocated to tenants at 30 percent AMI. As stated, the project site is located within a Transit Priority Area. MTS bus Route 4 is located along Imperial Avenue and there are existing stops fronting the site.

The project is proposed to be constructed in one phase, with construction assumed to be completed in early 2028. No change to the existing land use or zoning designation would be required to accommodate the project. The project would not have any adverse environmental effects as demonstrated herein; thus, no cumulative impacts would occur.

#### **Alternatives** [24 CFR 58.40(e); 40 CFR 1508.9]

**Offsite Alternative:** Consideration of an offsite alternative is not warranted because no significant impacts that cannot be avoided were identified.

**Reduced Project:** Reducing the size of the proposed project would incrementally reduce impacts across a range of issue areas such as air quality, water supply and wastewater. However, the project would maximize the unit count and incorporate common areas to ensure highest and best use of the site. Reducing the building footprint or number of units proposed is not a feasible or economically viable alternative.

**No Action Alternative** [24 CFR 58.40(e)]: If the proposed project was not implemented, existing uses would likely remain vacant. It is not known if or when another development would be proposed on the site and whether a development would utilize or demolish the buildings and parking lot. Regardless, without construction of the proposed project, the benefits associated with the affordable housing project would not occur.

**Summary of Findings and Conclusions:** The project proposes to construct one new multifamily residential building on a 1.35-acre site located at the northeast corner of 50<sup>th</sup> Street and Imperial Avenue. The building would have a five- and four-story component designed in a u-shaped configuration. The five-story portion of the building would be located on the northern portion of the site and have one below grade basement level containing 34 parking stalls, motorcycle and bicycle parking (20 spaces total), bicycle repair shop, trash room, mechanical room and related components. A total of one accessible parking space, one accessible van space, one Electric Vehicle (EV) accessible van space and three EV parking stalls would be provided. The four-story portion of the building would front Imperial Avenue. The project would provide a total of 100 units.

The project site is generally flat and is not subject to unusual geological hazards. The project site is located within Flood Zone X; and thus, is not within a Special Flood Hazard Area. No significant air quality impacts would occur. No historic or archaeological resources are known to be present onsite. Operational noise levels would not exceed 65 dBA CNEL. Interior noise levels would be less than the 45 dBA CNEL HUD and City of San Diego interior standard. The project would not change the existing noise environment.

The project would not adversely affect public services. The proposed project would not result in adverse effects on water or energy or generate the need for new or expanded water, wastewater, or solid waste facilities. The proposed project site is zoned CC-1-3 and designated Multiple Use in the July 2024 General Plan refresh and Mixed Use Neighborhoods Low in the Encanto Neighborhoods Community Planning Area. While the intensity of the use on-site would increase, it would be consistent with anticipated uses allowed per the zoning designations, the General Plan and Encanto Neighborhoods Community Plan Update. The project would not adversely affect traffic operations. The project would conform to applicable Federal, State, and regional regulations affecting air emission, water quality, cultural resources, geologic hazards and related environmental resources addressed herein.

## **Mitigation Measures and Conditions [40 CFR 1505.2(c)]**

Summarize below all mitigation measures adopted by the Responsible Entity to reduce, avoid, or eliminate adverse environmental impacts and to avoid non-compliance or non-conformance with the above-listed authorities and factors. These measures/conditions must be incorporated into project contracts, development agreements, and other relevant documents. The staff responsible for implementing and monitoring mitigation measures should be clearly identified in the mitigation plan.

Law, Authority, or Factor	Mitigation Measures and Conditions
None Required.	

### **Determination:**

**Finding of No Significant Impact** [24 CFR 58.40(g)(1); 40 CFR 1508.27]

The project will not result in a significant impact on the quality of the human environment.

**Finding of Significant Impact** [24 CFR 58.40(g)(2); 40 CFR 1508.27]

The project may significantly affect the quality of the human environment.

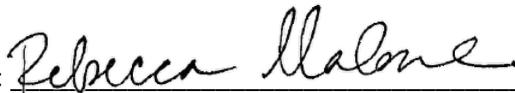
Preparer Signature:



Date: 01/27/2026

Name/Title/Organization: Ryan Birdseye, Principal Birdseye Planning Group

Certifying Officer Signature:



Date: 1/27/2026

Name/Title: Rebecca Malone, AICP, Program Manager, Planning Department, City of San Diego

This original, signed document and related supporting material must be retained on file by the Responsible Entity in an Environmental Review Record (ERR) for the activity/project (ref: 24 CFR Part 58.38) and in accordance with recordkeeping requirements for the HUD program(s).