



**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:	40 th and Alpha Street Apartments
Responsible Entity:	City of San Diego
Grant Recipient:	Community HousingWorks
State/Local Identifier:	California/City of San Diego (063210)
Preparer:	HELIX Environmental Planning, Inc. (HELIX)
Certifying Officer Name and Title:	Rebecca Malone, AICP, Program Manager City Planning Department, City of San Diego
Consultant:	HELIX Environmental Planning, Inc. (HELIX)
Direct Comments to:	City of San Diego, City Planning Department 202 C Street, M.S. 413 San Diego, CA 92101

Project Location: The approximately 0.5-acre project site consists of three non-contiguous parcels: Assessor's Parcel Numbers (APNs) 551-231-04-00, 551-231-05-00, and 551-231-35-00. The two western parcels (APNs 551-231-04-00 and 551-231-05-00) form Site 1 and the eastern parcel (APN 551-231-35-00) is Site 2. These parcels are collectively referred to as the project site. The project site is located north of Alpha Street, south of Z Street, and west of South 40th Street in the City of San Diego (City), San Diego County (County), California. Single-family residences occur west of the project site. Sites 1 and 2 are bifurcated by two single-family residences at 3979 and 3985 Z Street. The project site is within the Southeastern San Diego Community Plan Area and is designated Residential – Medium. (Figure 1, *Regional Location*; Figure 2, *Aerial Photograph*).

Description of the Proposed Project [24 CFR 50.12 & 58.32]: The proposed project (Proposed Action) involves the construction of a 92-unit affordable apartment complex across two buildings, totaling a gross building area of approximately 78,499 square feet (SF). One of the 92 units would be reserved as a manager's unit, with the remaining 91 units dedicated as affordable units targeting individuals earning between 30 and 60 percent of the Area Median Income (AMI). Refer to Figures 3a through 3d, *Site Plan*.

Site 1

The project proposes 78 units in an approximately 65,717 SF, six-level building on Site 1 (Figures 3a through 3d). Level 1 would be approximately 11,567 SF and would provide 19 parking spaces (15 standard and 4 tandem), a reception/office room, amenity room, and additional accessory rooms for trash and mechanical equipment. Level 2 would be approximately 10,830 SF and would provide an amenity room, a laundry room, and 14 dwelling units, as well as access to a 1,200-SF outdoor area. Levels 3 through 6 would each be approximately 10,830 SF and provide 16 dwelling units.

Site 2

The project proposes 14 dwelling units in an approximately 12,782 SF, three-level building on Site 2 (Figures 3a through 3d). The building on Site 2 would also contain a 2,400-SF childcare center. Level 1 would be approximately 3,538 SF and provide the childcare center along with access to an 1,800-SF outdoor play area, an office/mail room, and a room for trash/mechanical equipment. Levels 2 through 3 would each be approximately 4,622 SF and provide seven dwelling units.

Statement of Purpose and Need for the Proposal: The City is experiencing a housing crisis. According to the City's Housing Element (City 2021a), the City targeted to permit more than 88,000 new housing units between 2010 and 2020 to accommodate projected population growth, but less than half of those units were constructed. Of those units that were constructed, the majority were affordable only to households making more than 120 percent of the City's area median income. Within the City, 57 percent of renters and 34 percent of homeowners are identified as cost burdened, meaning 30 percent or more of a household's income is spent on housing. In addition, San Diego is projected to add nearly 154,000 jobs between 2012 and 2035, resulting in the need for additional housing (City 2021a). The purpose of the Proposed Action is

to increase the supply of affordable housing to help meet the ongoing demand for affordable housing within the City.

Existing Conditions and Trends [24 CFR 58.40(a)]: The project site is within the Southcrest neighborhood in the Southeastern San Diego Community Plan area. The Southeastern San Diego community is comprised of approximately 58 percent residential land uses and includes a mix of single-family and multi-family housing types throughout the community. Commercial development in the community plan area is concentrated along commercial corridors west of Interstate (I-) 15 and at shopping centers to the east, while industrial and employment uses are found on both sides of I-15 as well as along Commercial Street (City 2015).

The project site is currently vacant. The areas to the north, west, and southeast of the project site contain a mixture of single-family and multi-family residences. Cesar Chavez Elementary School is located south of the project site across Alpha Street and Southcrest Park is located to the east of the project site across South 40th Street (Figure 2). In addition, Chollas Creek is located to the northwest of the site. The site is conveniently located between the I-805 and I-15 freeways and is within walking distance (less than 0.5 mile) of retail locations such as grocery stores, restaurants, and pharmacies. Transit options are located to the north of the site along National Avenue and to the east of the site along South 43rd Street and, providing access to the 12 and 955 Metropolitan Transit System (MTS) bus routes, respectively, which connect to various transit stations throughout the San Diego region.

Funding Information

Grant Number	HUD Program	Funding Amount
	Community Development Block Grant (CDBG)	\$1,383,000

Estimated Total HUD Funded Amount: \$1,383,000

Estimated Total Project Cost (HUD and non-HUD funds) [24 CFR 58.32(d)]: \$49,654,022

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.

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 and 58.6		
Airport Hazards 24 CFR Part 51 Subpart D	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The project site is not within 15,000 feet of a military airport or 2,500 feet of a civilian airport (San Diego County Regional Airport Authority 2025). The San Diego International Airport is the nearest civilian airport to the site, located approximately 24,340 feet to the northwest. The nearest military airport to the site is the Naval Air Station North Island, which is located approximately 28,140 feet to the west. The project is in compliance with Airport Hazards requirements.
Coastal Barrier Resources Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	This project is located in a state that does not contain Coastal Barrier Resources System units. Therefore, the Proposed Action is in compliance with the Coastal Barrier Resources Act.
Flood Insurance Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The project is located in a Federal Emergency Management Agency (FEMA)-designated Flood Hazard Area (0.2 percent chance annual flood hazard; FEMA 2019). The City participates in the National Flood Insurance Program. While the project is not in a Special Flood Hazard Area and as such is not required to maintain flood insurance under the Flood Insurance regulations, the project would obtain flood insurance to minimize potential flood losses in accordance with Floodplain Management requirements. The project is in compliance with Flood Insurance requirements.

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
Clean Air Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The project is within the San Diego Air Basin (SDAB), where air quality is managed by the San Diego County Air Pollution Control District (SDAPCD). The SDAB is a non-attainment area for the federal ozone standard. California also adopts more stringent state air quality standards under the California Clean Air Act. The SDAB is a non-attainment area under state standards for ozone, particulate matter 10 microns or less in diameter (PM ₁₀), and particulate matter 2.5 microns or less in diameter (PM _{2.5}). Potential project emissions during construction and operations were modeled and compared with local daily emission screening criteria established by SDAPCD as well as federal de minimis levels for annual emissions. Based on modeling of the project's potential to generate ozone precursor pollutants, PM ₁₀ , and PM _{2.5} , the project would not exceed de minimis emissions levels or the screening levels established by the SDAPCD (HELIX 2025a). The project is also consistent with the applicable land use designation for the project site and would not result in a conflict with the Regional Air Quality Strategy or Attainment Plan. The project is in compliance with the Clean Air Act.
Coastal Zone Management Coastal Zone Management Act, sections 307(c) & (d)	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	This project is not located in, nor does it affect, a Coastal Zone (California Coastal Commission 2025). The project is in compliance with the Coastal Zone Management Act.
Contamination and Toxic Substances 24 CFR Part 50.3(i) & 58.5(i)(2)	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	Site contamination was evaluated by SCS Engineers in the Phase I Environmental Site Assessment (ESA) (SCS Engineers 2024). The Phase I determined that no recognized environmental conditions occur on the site. However, the Phase I ESA determined that as the site was previously developed with residential buildings between approximately 1949 and 2002, there is the potential for metals, lead, and/or organochlorine pesticides (OCPs) to be present in on-site soils. Therefore, following the recommendations of the Phase I ESA, the project would implement mitigation requiring

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
		soil sampling on the site and, if contaminants above applicable screening thresholds are detected, the preparation of a Soil Management Plan requiring the proper handling and disposal of these soils. The Proposed Action would be in compliance with contamination and toxic substances requirements.
Endangered Species Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The project would have no effect on listed species because there are no listed species or designated critical habitats in the project area (U.S. Fish and Wildlife Service [USFWS] 2025a). As confirmed by a site survey performed by a HELIX biologist on December 8, 2025, the project area is developed and the site does not contain native or sensitive habitats that would support species protected by the Endangered Species Act. Furthermore, the project site is not located within the City’s Multi-Habitat Planning Area (MHPA) and does not contain vernal pools or wildlife corridors according to the City of San Diego’s Vernal Pool Habitat Conservation Plan (VPHCP) Interactive Map (City 2025a). The nearest designated MHPA is located over 9,980 feet to the northwest and is separated from the project site by existing development. The City of San Diego Multiple Species Conservation Program Subarea Plan and VPHCP ensure compliance with the Endangered Species Act for projects within the City. The Proposed Action is in compliance with the Endangered Species Act.
Explosive and Flammable Hazards 24 CFR Part 51 Subpart C	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The Phase I ESA included a search of aboveground and underground storage tanks and did not identify any on the project site (SCS Engineers 2024). Adjoining properties were also inspected and no indicators of contamination from nearby underground or aboveground storage containers were noted. Therefore, the project is in compliance with explosive and flammable hazard requirements.

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
Farmlands Protection Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The project site is surrounded by existing urban development and is mapped as Urban and Built-Up Land in the California Important Farmland Finder (California Department of Conservation 2020). Therefore, the Proposed Action would not affect farmland and is in compliance with the Farmland Protection Policy Act.
Floodplain Management Executive Order 11988, particularly section 2(a); 24 CFR Part 55	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The project site is located in a 0.2-percent-annual-chance floodplain (Zone X), according to mapping by FEMA (FEMA 2019). An 8-step process was conducted and no practicable alternative was identified. Documentation of the 8-step process per 24 CFR 55.20 is included in the project's Environmental Review Record. The Proposed Action would adhere to conditions to minimize potential risks including requirements for the lowest floor elevation to be at or above the 0.2-percent-annual-chance floodplain, or for the buildings to be floodproofed to this elevation. The project is in compliance with Executive Order 11988.
Historic Preservation National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	HELIX prepared a Cultural Resources Study (HELIX 2025b) to identify the potential for archaeological resources to occur on-site. The Cultural Resources Study included a record search, a Sacred Lands File search from the Native American Heritage Commission (NAHC), a review of historic aerial photographs and maps, and a site survey. The records search did not identify resources within the project site; however, resource P-37-025706 (CA-SDI-17099) was previously recorded adjacent to the site. The NAHC responded that the Sacred Lands File search results were negative. HELIX staff also conducted a survey of the project site on March 12, 2025, during which no archeological resources were observed. Based on archival research showing significant disturbance of the project area and the surrounding vicinity as well as the channelization of Chollas Creek, the Cultural Resources Study determined that no known

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
		<p>historic properties would be affected by the implementation of the project.</p> <p>Due to the proximity of a previously recorded resource and Chollas Creek, and the fact that the project is located within an area of moderate sensitivity for cultural resources, cultural resource monitoring would be implemented during initial ground disturbance.</p> <p>Implementation of an archaeological and Native American monitoring program would be a condition of the project to prevent disturbance to unrecorded, buried cultural resources. Upon satisfactory implementation of this condition, the project would be in compliance with Section 106. As such, the Proposed Action would not conflict with the National Historic Preservation Act.</p>
Noise Abatement and Control Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	<p>The project site is not located within 1,000 feet of a major road or 3,000 feet of a railroad. The site is located within 15 miles of an airport but is outside of the associated noise contours (San Diego County Regional Airport Authority 2025; HELIX 2025c). Therefore, project residents would not be exposed to excessive airport noise. In addition, project construction would be required to comply with the City's Noise Abatement and Control Ordinance, which limits hours of construction from 7:00 a.m. to 7:00 p.m. and noise levels received at residentially-zoned properties to a 12-hour average of 75 decibels, unless otherwise allowed by an approved construction noise permit. The project is in compliance with HUD's Noise regulation.</p>
Sole Source Aquifers Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	<p>The project site is not located in a sole source aquifer area. As shown in the Sole Source Aquifers map, the nearest sole source aquifer to the project site is the Campo/Cottonwood Creek Aquifer located approximately 16 miles to the southeast (U.S. Environmental Protection Agency 2025). The Proposed Action is in</p>

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
		compliance with Sole Source Aquifer requirements.
Wetlands Protection Executive Order 11990, particularly sections 2 and 5	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The project site is developed and there were no wetlands or vernal pools identified during the site survey performed by a HELIX biologist on December 8, 2025 nor through the VPHCP Map (City 2025a) or the National Wetlands Inventory (USFWS 2025b). Therefore, the project would not impact on- or off-site wetlands. The project is in compliance with Executive Order 11990.
Wild and Scenic Rivers Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	As shown on the Wild and Scenic Rivers map (National Wild and Scenic Rivers System 2025), the project site is not within proximity of a National Wild and Scenic Rivers System river. The project is in compliance with the Wild and Scenic Rivers Act.
ENVIRONMENTAL JUSTICE		
Environmental Justice Executive Order 12898	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The project site is within an environmental justice community identified in the City General Plan Environmental Justice Element (City 2024). No adverse environmental impacts were identified in the project's total environmental review. Therefore, the Proposed Action would not result in adverse effects disproportionately affecting low-income or minority communities. Rather, the project would provide affordable housing for low-income individuals and add childcare services to the community. The project is in compliance with Executive Order 12898.

Environmental Assessment Factors [24 CFR 58.40]:

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 of 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
LAND DEVELOPMENT		
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	2	<p>The Proposed Action involves a 92-unit affordable apartment complex totaling 78,499 SF of gross floor area on two separate, non-adjacent sites totaling approximately 0.5 acre. The project site is located within the Southeastern San Diego Community Plan area, and the site has a community plan land use designation of Residential – Medium, which allows a maximum density of 29 dwelling units per acre. The project site is additionally zoned Residential – Multiple Unit (RM-2-5) which permits a maximum density of 1 dwelling unit per 1,500 SF of lot area and includes Child Care Centers as a permitted use with limitations subject to the regulations outlined in San Diego Municipal Code Section 141.0606(c). As the project proposes affordable housing, two options for increased density apply to the base density allowed for the RM-2-5 zone.</p> <p>The project site is located in a Complete Communities Tier-3 overlay and the project proposes affordable housing in accordance with the Housing Solutions Regulations (San Diego Municipal Code Chapter 14, Article 3, Division 10); therefore, the allowable floor area ratio (FAR) would be 6.5 with no limitation on the number of dwelling units if the project opts into this incentive program (City 2020). The Complete Communities Housing Solutions program also provides a range of other incentives such as scaling of development impact fees, up to five development regulation incentives, and a waiver of other development regulations such as maximum height. The project proposes a FAR of 4.7 on Site 1 and a FAR of 1.7 on</p>

Environmental Assessment Factor	Impact Code	Impact Evaluation
		<p>Site 2, which is below the allowable FAR under the Housing Solutions Regulations.</p> <p>If the project is not processed under the optional Complete Communities program, the project site also qualifies for unlimited density, among other benefits, under the State Density Bonus Law. Pursuant to Government Code Section 65915(f)(3)(D)(iii), the project site is eligible for no maximum density based on its location in a “very low vehicle travel area,” meaning it is located in an urbanized area where vehicle miles traveled (VMT) per capita is less than 85 percent of the regional mean. The project area (census tract) generates 73.4 percent of the regional mean VMT per resident and 73.9 percent of the regional mean VMT per employee (San Diego Association of Governments 2021), thereby qualifying the project site for no maximum density. Consistent with state law, San Diego Municipal Code Affordable Housing Regulations (Chapter 14, Article 3, Division 7) allows unlimited density for the proposed affordable housing project based on its location in a sustainable development area (Mobility Zone 2).</p> <p>Adherence to other development regulations such as setback distances (unless otherwise revised based on the incentives and waivers available under the affordable housing regulations described above) would be confirmed when final plans are available during the City’s building permit issuance process. The project is therefore consistent with the applicable land use and zoning regulations pertaining to the development.</p>
Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff	2	<p>According to the project’s Geotechnical Investigation (NOVA Services, Inc 2025), the Proposed Action is feasible from a geotechnical standpoint with the incorporation of geotechnical recommendations in accordance with standard building regulations. The project site is underlain by fill and young alluvial floodplain deposits, which are potentially liquefiable and susceptible to post-liquefaction dynamic settlements and lateral spreading during a significant seismic event. However, the project would implement the recommendations of the final geotechnical report for the project, which would include specifications for ground improvements such as stone columns, earthquake drains, or pressure grouting to reduce potential hazards to future residents. The Geotechnical Investigation also concluded that upper soils are loose and potentially compressible but remedial grading would improve subgrade support and further reduce the potential for settlement. In addition, the project would be built in accordance with California Building Code (CBC) standards applicable to the on-site soil types.</p> <p>The project site does not contain substantial slopes and the project does not propose the creation of steep slopes. Minor</p>

Environmental Assessment Factor	Impact Code	Impact Evaluation
		<p>slopes created by the project would be constructed in accordance with geotechnical recommendations. Compliance with the CBC would further reduce the potential for geologic hazards to affect future residents.</p> <p>During construction, the removal of existing vegetation would expose soils and increase the potential for erosion. Erosion during construction would be managed through implementation of a Water Pollution Control Plan (WPCP), as required by the City's Municipal Code (Section 142.0210) and Land Development Manual (Stormwater Standards Manual). The City requires a WPCP to identify best management practices (BMPs) related to project planning, site management, non-stormwater management, erosion control, sediment control, and run-on and runoff control, which together prevent pollution discharges. Once the site is developed, on-site soils would be stabilized by buildings or paved surfaces and landscaping. Further, the project would be required to install site design and source control BMPs to manage long-term drainage and runoff according to the City's Stormwater Standards Manual.</p>
Hazards and Nuisances including Site Safety and Noise	2	<p>According to the project's Geotechnical Investigation (NOVA Services, Inc 2025), the potential for liquefaction and hydro-consolidation on the site is high. As such, the project would incorporate the recommendations of the final geotechnical report, which would include specifications for remedial grading and ground improvement techniques. In addition, the project would be built in accordance with CBC standards applicable to the on-site soil types and geologic conditions.</p> <p>There is very low to low potential for fault rupture, landslides, slope instabilities, tsunamis, seiches, or subsidence. The risk of strong ground motion is common to all construction in southern California and is managed through building design in accordance with the CBC.</p> <p>In addition, the project would adhere to applicable HUD and City requirements for residential construction within a floodplain as well as conditions identified through the 8-step process. Compliance with applicable regulations and design conditions would ensure that risks associated with residential construction within a floodplain are minimized.</p> <p>As described further above, the Phase I ESA did identify a potential risk of on-site soil contamination. However, with the implementation of mitigation requiring additional soil sampling on the site and, if warranted, the preparation of a Soil Management Plan for the proper disposal of these soils, this would not constitute a substantial risk and the site would be suitable for a residential and childcare center development. Therefore, historic contamination of on-site and nearby soils</p>

Environmental Assessment Factor	Impact Code	Impact Evaluation
		<p>would not represent a substantial risk to future project residents.</p> <p>The project is a residential development with an on-site childcare center and would not represent a noise-generating facility. As a residential and childcare center development, noise generated by the project would primarily be from mechanical equipment and vehicle trips. These sources are similar to those existing for residential sites near the project site and would not adversely affect nearby noise-sensitive land uses. On-site mechanical equipment noise would be regulated by the San Diego Municipal Code. Future residents would not be exposed to excessive noise levels.</p> <p>The proposed project would not result in the generation of nor the exposure of future residents to significant hazards, nuisances, or risks to public safety or noise.</p>
SOCIOECONOMIC		
Employment and Income Patterns	1	<p>The proposed project would provide 91 affordable housing units targeting individuals earning between 30 and 60 percent of AMI and 1 manager's unit. A small number of temporary jobs would be created during construction and these jobs would be filled from the existing local population. Once operational, standard property management and maintenance tasks related to the residential development and childcare center operation would require labor from the existing local population. Based on the small number of jobs that would be generated by the project and the small number of new housing units that would be created in the context of the regional job market, the project's overall effect on employment and income patterns would not be adverse. Rather, the creation of additional employment opportunities during project construction, along with the provision of affordable housing units, would benefit the local population.</p>
Demographic Character Changes, Displacement	1	<p>The proposed project would provide 91 affordable residential units and 1 manager's unit in the City of San Diego, which lacks sufficient affordable housing for the existing population. The provision of affordable housing is considered beneficial from a demographic standpoint and is anticipated to primarily benefit the existing local community without resulting in substantial changes to the demographics of the project area. The site is currently vacant and construction of the project would not result in the displacement of any individuals.</p>
Environmental Justice	1	<p>As described above, the project site is located within an environmental justice community identified by the City General Plan (City 2024). However, no significant adverse environmental impacts have been identified for the proposed project; therefore, the project would not result in</p>

Environmental Assessment Factor	Impact Code	Impact Evaluation
		disproportionate environmental effects on minority populations or other communities inequitably affected by environmental risks. In addition, no conditions of the site such as sources of pollution or existing hazards that would adversely affect future project residents once construction is complete have been identified. The Proposed Action involves an affordable housing development targeting low-income individuals. Therefore, the project would advance environmental justice and would not cause adverse effects.
COMMUNITY FACILITIES AND SERVICES		
Educational and Cultural Facilities	2	The proposed project would not directly affect educational or cultural facilities because there are none located on the site. Elementary, middle, and high schools are located within one mile of the project site, including an elementary school located south of the project site across Alpha Street. Multiple cultural facilities such as a library and community centers are also located within one mile of the project site. Based on the small increase in dwelling units, and therefore school-aged children, the proposed project would not induce substantial population growth such that new educational or cultural facilities would be required in the City. The Proposed Action would not have an adverse effect related to educational or cultural facilities.
Commercial Facilities	2	The proposed project would not directly affect commercial facilities given there are none located on the site. The project is within walking distance (0.5 mile) of multiple retail locations located along Alpha Street, such as grocery stores, restaurants, and a daycare. Based on these nearby commercial facilities, as well as numerous others accessible via the nearby I-805 and I-15 freeways and bus routes, there are sufficient commercial services available to serve the future project residents. No adverse effects would occur.
Health Care and Social Services	2	<p>The proposed project would not directly affect health care or social services facilities given there are none located on the site. Healthcare facilities near the project site include the Clinica Internacional Buena Salud Inc. medical clinic located 0.3 mile to the northwest, which provides urgent care and primary care services, along with the San Ysidro Health Comprehensive Health Center – Ocean View located approximately 1.1 miles northwest of the site. A full-service hospital, Paradise Valley Hospital, is also located approximately 1.5 miles southeast of the project site.</p> <p>Social services available within the project vicinity include mental health services, day care centers, and churches providing food distribution. The number of new housing units created by the project would not add a substantial number of residents to the local population such that the provision of</p>

Environmental Assessment Factor	Impact Code	Impact Evaluation
		additional health care or social services facilities would be required, and no adverse effect would occur. In addition, the project would include the development of an on-site childcare facility which would benefit the surrounding community by providing additional childcare services.
Solid Waste Disposal / Recycling	2	<p>The project would be required to comply with the City's Construction and Demolition Debris Diversion Deposit Program Ordinance (Chapter 6, Article 6, Division 6), which requires projects to divert a minimum of 65 percent of their construction and demolition debris from landfills. During operation of the project, residents would be required to divert recyclable materials and organic waste in accordance with state and local regulations.</p> <p>Local landfills include the City of San Diego's West Miramar Landfill, which is estimated to continue accepting solid waste through 2031, and the privately operated Sycamore Landfill, which is estimated to continue accepting solid waste through 2042 or later (California Department of Resources Recycling and Recovery 2025). Based on the scale of the proposed project and compliance with statewide and local waste diversion requirements, the proposed project would not generate solid waste in excess of the regional landfill capacity, and no adverse impacts would occur.</p>
Waste Water / Sanitary Sewers	2	Wastewater from the proposed project site would be conveyed and treated by the City Public Utilities Department's wastewater infrastructure and treated at the Point Loma Wastewater Treatment Plant. The Point Loma Wastewater Treatment Plant treats approximately 175 million gallons of wastewater per day and has a treatment capacity of 240 million gallons per day (City 2025b). The project would not necessitate the construction of new wastewater facilities other than laterals connecting the proposed buildings to existing public sewer lines. No septic tanks are included in the project proposal and there would be no associated impacts.
Water Supply	2	The proposed project would receive water from the City's Public Utilities Department. The City purchases most of its water from the San Diego County Water Authority (SDCWA), according to the City's 2020 Urban Water Management Plan (UWMP) (City 2021b). SDCWA receives water from the Colorado River through contractors including the Imperial Water District and Metropolitan Water District of Southern California. Average demand by the City for SDCWA imports is expected to decrease as the Pure Water project comes online. The proposed project is consistent with the applicable development regulations and therefore compatible with the UWMP, which indicates that water supplies can fulfill demand through 2045. With less than 500 residential units, the

Environmental Assessment Factor	Impact Code	Impact Evaluation
		proposed project falls below the mandated threshold for preparing a project-specific Water Supply Assessment pursuant to California Water Code Sections 10910-10915. Based on the scale of the Proposed Action, it would not generate the need to construct new water treatment or conveyance facilities other than to connect the proposed buildings to existing distribution infrastructure in public rights-of way.
Public Safety - Police, Fire and Emergency Medical	2	<p>The proposed project would be served by the San Diego Police Department Southeastern Division (City 2025c). The Southeastern Division is stationed at 7222 Skyline Drive, approximately 3.9 miles east of the project site. The project site is in an area already served by City police and the 92 residential units created by the proposed project would not generate the need for a new police station or expanded services.</p> <p>The proposed project would be served by the San Diego Fire Department for fire and emergency medical services. The project site is in Fire Station 19's district, with the station located at 3434 Ocean View Boulevard approximately 0.9-mile northwest of the site. The nearest fire station with paramedic services is Station 12, located approximately 1.4 miles northeast of the site (City 2025d). The closest full-service hospital is Paradise Valley Hospital, located approximately 1.5 miles southeast of the project site. Based on the scale of the Proposed Action, it would not generate the need for new police, fire, or emergency medical facilities to be constructed.</p>
Parks, Open Space and Recreation	2	The proposed project would not directly affect existing parks, open space, or recreation areas. The closest park to the project site, Southcrest Park, is east of the project site across South 40 th Street while the closest trailhead is the entrance to Southcrest Trails Park approximately 0.2 mile southwest of the project site. Fields and recreational space at Cesar Chavez Elementary School to the south of the site would also be available to future residents outside of school hours in accordance with the City's joint-use agreement with the San Diego Unified School District. The small number of units created by the proposed project would not generate the need for an expansion of park or recreational services provided by the City. The Proposed Action would not substantially affect parks, open spaces, or recreation facilities or require the provision of new facilities.
Transportation and Accessibility	2	Public transit options are located approximately 0.33 mile to the east of the site along South 43 rd Street and approximately 0.25 mile to the north of the site along National Avenue. These bus stops provide access to the MTS bus routes 12 and 955 which connect to various transit stations throughout the San Diego area. Based on the scale of the project, it would support the existing transit routes by providing additional riders but would not create the need for new or modified transit services.

Environmental Assessment Factor	Impact Code	Impact Evaluation
		<p>In addition, there are existing sidewalks along South 40th Street and Alpha Street adjacent to the project site, and the Southeastern San Diego Community Plan includes plans for a Class I bike path along Chollas Creek in the vicinity of the project site. The project would not affect these existing or planned pedestrian and bicycle facilities. The project also would not generate a substantial number of daily trips (up to 744 trips; City 2003) and a local mobility analysis is not required (the project is consistent with the land use plan and would generate less than 1,000 average daily trips). Therefore, the Proposed Action would not result in adverse effects to transit or roadways.</p>
NATURAL FEATURES		
Unique Natural Features, Water Resources	2	<p>The project area is highly developed with no noteworthy natural views. No unique natural features were identified within or visible from the project site.</p> <p>Chollas Creek is the nearest body of water to the project site and is approximately 60 feet northwest of Site 1 but would not be affected by the proposed project. The Geotechnical Investigation (NOVA Services, Inc 2025) encountered groundwater at depths of 28 feet, 15 feet, and 25 feet below ground surface during borings. As such, the project would incorporate the recommendations of the final geotechnical report related to groundwater considerations, which could include temporary dewatering. However, the project would not result in the direct or long-term use of groundwater supplies. The Proposed Action would not result in an adverse effect to unique natural features or water resources.</p>
Vegetation, Wildlife	2	<p>Based on mapping of sensitive vegetation (City 2025a) and a survey of the site by a HELIX biologist, the proposed project site does not contain native vegetation or habitat for sensitive wildlife that would be adversely affected by project development.</p>
Other Factors	2	<p>No other factors have been identified which would result in an adverse effect on the environment.</p>
CLIMATE AND ENERGY		
Energy Efficiency	2	<p>Project construction activities would result in a temporary increase in energy consumption, primarily through the combustion of fuels in construction vehicles, worker commute vehicles, and construction equipment. The proposed project would also consume energy during operation for building heating and cooling, refrigeration, lighting, electricity, and equipment when occupied and in use. New vehicle trips associated with project operations would also be a source of energy consumption. The project would be constructed in</p>

Environmental Assessment Factor	Impact Code	Impact Evaluation
		accordance with statewide requirements for energy efficiency contained in the California Code of Regulations Title 24. This would include the implementation of insulation, windows, and building materials to promote energy-efficient heating and cooling as well as the installation of water-efficient fixtures to decrease water use and energy required to heat and transport water. Construction of the project in accordance with state requirements would ensure energy efficient operation of the buildings.

Additional Studies Performed:

1. **Phase I Environmental Site Assessment.** The project's Phase I Environmental Site Assessment was prepared by SCS Engineers and is dated December 11, 2024.
2. **Air Quality Conformity Assessment.** HELIX prepared an air quality analysis dated December 18, 2025.
3. **Cultural Resources Study.** HELIX prepared the Cultural Resources Study dated April 11, 2025.
4. **Noise Analysis.** HELIX analyzed potential noise exposure using the HUD screening criteria in an analysis dated April 17, 2025.
5. **Geotechnical Investigation.** The project's Geotechnical Investigation was prepared by NOVA Services, Inc. and is dated March 7, 2025.
6. **General Biological Survey.** HELIX conducted a general biological survey of the project site on December 8, 2025.

Field Inspection (Date and completed by):

November 19, 2024 (SCS Engineers)
January 27, 2025 (NOVA Services, Inc.)
March 26, 2025 (HELIX)
December 8, 2025 (HELIX)

List of Sources, Agencies and Persons Consulted:

California Coastal Commission

2025 Coastal Zone Boundary, San Diego. Available at:
<https://coastal.ca.gov/maps/czb/>. Accessed November 25.

California Department of Conservation

2020 California Important Farmland Finder. Available at:
<https://maps.conservation.ca.gov/DLRP/CIFF/>. Accessed November 26, 2025.

California Department of Resources Recycling and Recovery

2025 Solid Waste Information System. Available at:
<https://www2.calrecycle.ca.gov/SolidWaste/Site/Search>. Accessed December 1.

Federal Emergency Management Agency (FEMA)

2019 Flood Map Service Center FIRM 06073C1903H. Effective December 20.

HELIX Environmental Planning, Inc. (HELIX)

2025a Air Quality Conformity Assessment for the 40th and Alpha Apartments Project. December 18.

2025b Cultural Resources Study for the 40th and Alpha Apartments Project. April 11.

2025c Noise Abatement and Control Supplement for the 40th and Alpha Apartments Project. April 17.

National Wild and Scenic Rivers System

2025 National Wild and Scenic Rivers, Find a River. Available at:
<https://www.rivers.gov/map>. Accessed December 4.

NOVA Services, Inc

2025 Geotechnical Investigation. March 7.

SCS Engineers

2024 Phase I Environmental Site Assessment. December 11.

San Diego, City of (City)

2025a VPHCP Interactive Map. Available at:
<https://webmaps.sandiego.gov/portal/apps/webappviewer/index.html?id=d04d9b6e46fc43cf998f46d9018c04e3>. Accessed November 25.

2025b Point Loma Wastewater Treatment Plant. Available at:
<https://www.sandiego.gov/public-utilities/water-quality/water-wastewater-facilities/point-loma>. Accessed December 8.

2025c Find Your Police Station. Available at:
<https://sandiego.maps.arcgis.com/apps/instant/lookup/index.html?appid=a3bd23eeb88d44a582057f2b0ae5045a>. Accessed December 4.

2025d Fire Stations. Available at: <https://www.sandiego.gov/fire/about/firestations>. Accessed December 4.

2024 City of San Diego General Plan: Environmental Justice Element. July.

2021a City of San Diego General Plan Housing Element 2021-2029. June.

2021b 2020 Urban Water Management Plan. June.

2020 Complete Communities Housing Solutions Regulations. San Diego Municipal Code Chapter 14, Article 13, Division 10. As amended through July 22, 2024.

2015 Southeastern San Diego Community Plan. October.

- 2003 San Diego Municipal Code, Land Development Code, Trip Generation Manual. May.

San Diego Association of Governments

- 2021 San Diego Region SB743 VMT Maps. Available at: <https://www.arcgis.com/apps/webappviewer/index.html?id=bb8f938b625c40cea14c825835519a2b>. Accessed December 17, 2025.

San Diego County Regional Airport Authority

- 2025 ALUCP Mapping Tool. Available at: <https://sdcraa-aluc.maps.arcgis.com/apps/webappviewer/index.html?id=945b3a6b12a34b158d8c9022251542e3>. Accessed November 26.

U.S. Environmental Protection Agency

- 2025 Sole Source Aquifers. Available at: <https://experience.arcgis.com/experience/1bfab371d71e4b868fc9ae7df62a16fe>. Accessed December 4.

U.S. Fish and Wildlife Service (USFWS)

- 2025a Critical Habitat for Threatened & Endangered Species. Available at: <https://fws.maps.arcgis.com/home/webmap/viewer.html?webmap=9d8de5e265ad4fe09893cf75b8dbfb77>. Accessed November 26.
- 2025b National Wetlands Inventory. Available at: <https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/>. Accessed December 9.

List of Permits Obtained:

The Proposed Action would require grading and building permits from the City of San Diego prior to construction. No wildlife resource or other agency permits are anticipated to be required.

Public Outreach [24 CFR 50.23 & 58.43]:

Public notice of the NEPA Finding of No Significant Impact and Request for Release of Funds will be provided on the City's website and a local newspaper (San Diego Daily Transcript) in accordance with applicable HUD noticing requirements.

Cumulative Impact Analysis [24 CFR 58.32]:

The proposed project is not expected to contribute to a significant cumulative impact because it would consist of a small affordable housing project that would be consistent with the site's land use and zoning designations and development regulations applicable to the site. No significant adverse project-level effect that would not be reduced below an acceptable level with the inclusion of identified mitigation measures and regulatory conditions have been identified. State and local planning guidelines encourage the development of urban infill, multi-family housing in areas served by transit because this type of development contributes less to cumulative effects on the environment in comparison to the development of previously undisturbed sites outside of

urbanized areas. As the project site is in a developed area of the City served by commercial and community amenities as well as transit, the Proposed Action would not contribute to significant cumulative impacts and would avoid the cumulative impacts otherwise associated with sprawl.

Alternatives [24 CFR 58.40(e)]:

The Proposed Action would develop a 92-unit apartment complex on an approximately 0.5-acre site and no significant adverse effects would occur. The property proposed for development was awarded to Community HousingWorks after being designated surplus land by the City; therefore, other than brief coordination with adjacent landowners to explore potential for connectivity of Sites 1 and 2, no broader site alternatives analysis was conducted. The alternatives considered as part of the 8-step process included an alternative site or lower density option. Neither of these alternatives were found to be feasible and/or avoid the insignificant environmental impacts of the project. No other modifications or alternate uses were considered for the Proposed Action.

No Action Alternative [24 CFR 58.40(e)]:

Implementation of the No Action Alternative would avoid the insignificant impacts of the project. The No Action Alternative would also not meet the goal of increasing the availability of affordable housing in San Diego where the supply is insufficient for the current population's needs.

Summary of Findings and Conclusions:

The Proposed Action would not result in significant effects on the natural or human environment. This finding is based on the relatively small size (92 units) of the Proposed Action on an infill site and the analysis presented herein.

Mitigation Measures and Conditions

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 Measure/Project Condition
Floodplain Management Executive Order 11988, particularly section 2(a); 24 CFR Part 55	The project shall be constructed and maintained in compliance with 24 CFR 55.20(e), including being constructed above or floodproofed to the 0.2-percent-annual-chance floodplain and providing an evacuation plan for residents. The project shall also obtain flood insurance meeting the requirements of the National Flood Insurance Program to protect HUD investments so long as the project site remains within a floodplain mapped by FEMA.

Contamination and Toxic Substances 24 CFR Part 50.3(i) & 58.5(i)(2)	Limited soil sampling shall be conducted by a qualified consultant hired by the project proponent as a precautionary measure to ensure that future occupants, construction workers, and others are not exposed to elevated concentrations of lead, other metals, and/or OCPs. If contaminated soils are detected and found to be above the applicable screening thresholds established by the Office of Environmental Health Hazard Assessment, a soil management plan (SMP) shall be implemented to direct the proper observation, handling, segregation, and/or disposal of impacted soil during construction activities. The SMP shall include direction for excavating and properly disposing of soil exceeding Health Risk-Based Mitigation Criteria (as established in the SMP according to Department of Toxic Substances Control screening levels or other applicable criteria) or Waste-Based Mitigation Criteria (as established in the SMP based on Regional Water Quality Control Board screening levels, California Code of Regulations, Title 22 Article 3, and/or other applicable regulations). All soils removed from the site shall be disposed of in accordance with applicable County regulations at the receiving facilities.
Historic Preservation National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800	The project shall implement archaeological and Native American monitoring during initial ground disturbing activities associated with project construction according to standard City policies and conditions for construction monitoring in moderate sensitivity areas.

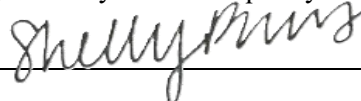
Determination:

☒ **Finding of No Significant Impact** [24 CFR 58.40(g)(1)]

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)]

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

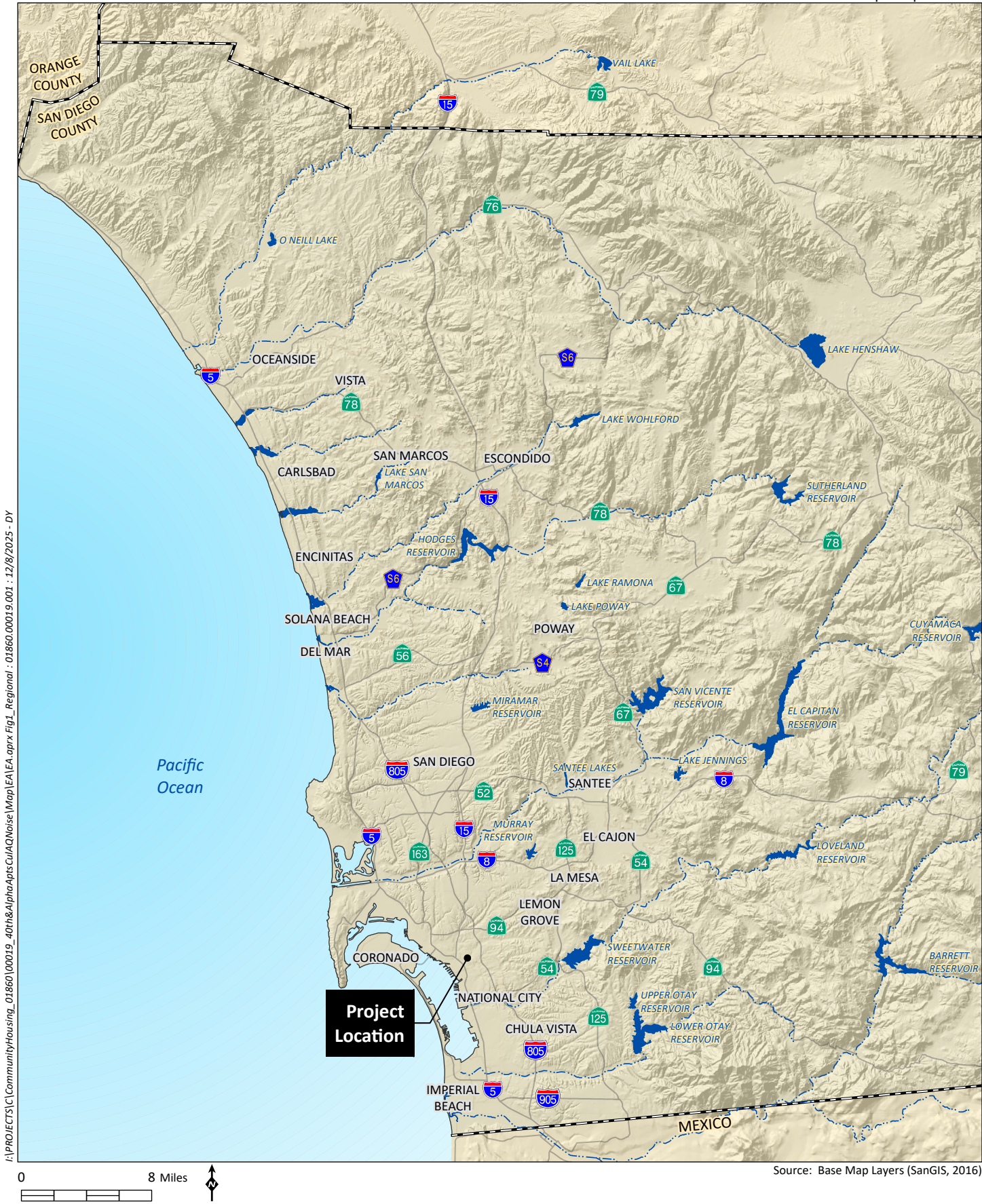
Preparer Signature:  Date: 2/3/26

Name/Title/Organization: Shelby Bocks, Environmental Project Manager
HELIX Environmental Planning

Certifying Officer Signature:  Date: 2/3/26

Name/Title: Rebecca Malone, AICP, Program Manager

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).



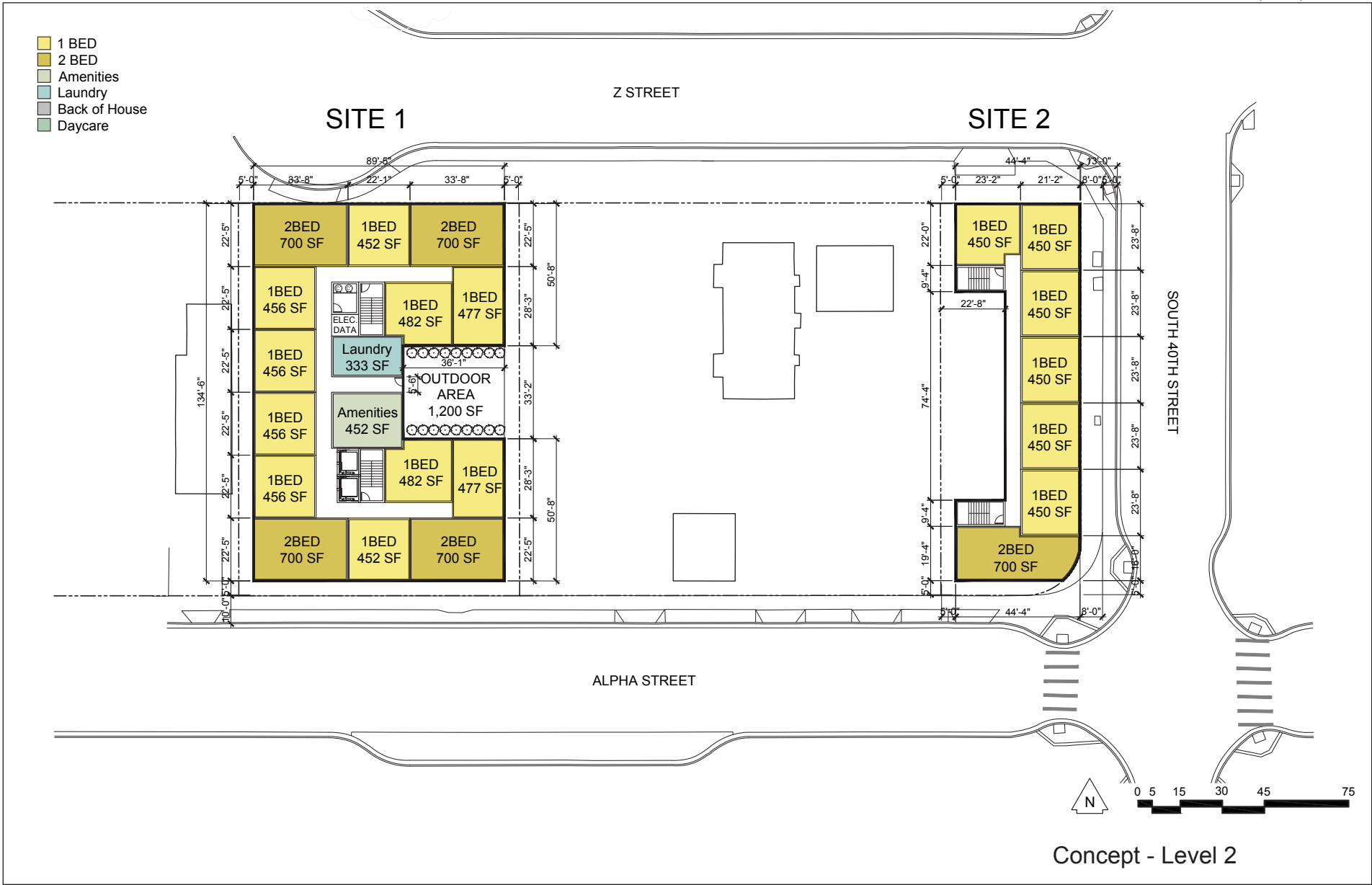
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Source: Base Map Layers (SanGIS, 2016)





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Concept - Level 2

Source: AVRP Studios, 2025



