THE CITY OF SAN DIEGO

ADDENDUM

Project No. 1105210
Addendum to EIR No. 380611/SCH No. 2013121076
and EIR SCH No. 2019060003

SUBJECT: **NEWMAN BUILDING:** A SITE DEVELOPMENT PERMIT (SDP) to substantially alter a designated historic resource, known as the Edward and Emma Newman Building (Historic Resources Board Site #1482), located at 2906 and 2912 University Avenue. The project would retain and rehabilitate the designated historical resource building's west and south façades, demolish the remainder of the existing historic building and the adjacent building at 2920 University Avenue (which is not a designated historic resource), and construct a 7-story, 108,000 square-feet), mixed-use project. The mixed-use project would include 92-units (including 16 affordable units), approximately 4,900 square-feet of ground-floor commercial, and a 1-level subterranean parking garage with 23 parking spaces. The 0.34-acre project site is located at 2906, 2912, and 2920 University Avenue (Assessor Parcel Number (APNs): 446-412-00-00 and 446-413-11-00). The project site is zoned Community-Commercial (CC-3-9) and designated as Community Commercial (0-109 dwelling units/acre) and Community Village in the North Park Community Plan. Additionally, the project site is located within the following overlay and planning areas: Airport Land Use Compatibility Overlay Zone (San Diego International Airport (SDIA), Airport Influence Area (SDIA - Review Area 2); Federal Aviation Authority Part 77 Noticing Area; Complete Communities Housing Solutions Floor Area Ratio (FAR) Tier 3: 6.5 Floor Area Ratio; Complete Communities Mobilities Choices – Mobility Zone 2; Transit Area Overlay Zone; Parking Standards Transit Priority Area; Transit Priority Area; Medium Affordable Housing Parking Demand; Sustainable Development Area; and North Park Business Improvement District. (LEGAL DESCRIPTION: Lots 21, 22, 23, and 24 inclusive, excepting the east 50 feet and the west 90 feet thereof in block 206 of University Heights, in the City of San Diego, County of San Diego, State of California according to the amended map thereof made by G.A. D'Hemecourt recorded in the office of the Recorder of San Diego County, in Book 8, Page 36, et seq. of Lis Pendens).

APPLICANT: North Park Building, LLC.

I. SUMMARY OF ORIGINAL PROJECT

As outlined herein, DSD has determined that the proposed project is consistent with the following environmental documents and their appendices, which are hereby incorporated by reference:

- Final Program Environmental Impact Report (PEIR) (SCH No. 2013121076) for the North Park and Golden Hill Community Plan Updates (CPUs; Project No. 380611) certified by the City Council on November 7, 2016, per City Council Resolution No. R-310757.
- Final Environmental Impact Report (FEIR; SCH No. 2019060003) for Complete Communities: Housing Solutions and Mobility Choices (Complete Communities) certified by the City Council on November 17, 2020, per City Council Resolution No. R-313279.

As used herein, the term "North Park CPU PEIR" refers to the 2016 North Park and Golden Hill CPUs PEIR; and the term "Complete Communities FEIR" refers to the 2020 FEIR. The term "Complete Communities Program" refers to the Complete Communities: Housing Solutions (CCHS) and Complete Communities: Mobility Choices (CCMC) elements evaluated in the FEIR.

North Park CPU PEIR

The North Park and Golden Hill Community Plan Updates (CPUs) FEIR assesses the environmental impacts of implementing the plan updates. The North Park and Golden Hill Community Plans were last updated in 1986 and 1988, respectively. The proposed updates ensure consistency of the CPUs and incorporate relevant policies from the City of San Diego General Plan (General Plan), as well as provide a long-range, comprehensive policy framework and vision for growth and development in the two communities through 2035.

Included in each CPU are village districts; amendments to the General Plan to incorporate the updated community plans as components of the General Plan's Land Use Element; amendments to the Land Development Code (LDC) and maps; and comprehensive update to the existing Impact Fee Studies (formerly known as Public Facilities Financing Plans) resulting in a new impact fee study for each CPU. The CPUs and associated regulatory documents form the "project" for this PEIR.

Taken together, the North Park and Golden Hill Community Plans aim to guide future development over the next 20 to 30 years, which is transit supportive per the General Plan and also protective of desired community character and resources. The proposed land use plans locate the highest-intensity land uses within each community along transit corridors where existing and future commercial, residential and mixed-use development can support existing and planned transit investments. Residential density is proposed to be increased from the adopted plans in some areas and, within Golden Hill, reduced in some areas to help achieve these objectives.

The Land Use Elements define Village Districts and key corridors where future growth is targeted within both communities to fulfill the General Plan's City of Villages strategy. While the proposed CPUs set forth procedures for implementation, they do not, on their own, establish regulations or legislation, nor do they, on their own, rezone property. Controls on development and use of public and private property, including zoning, development regulations, and implementation of transportation improvements, are included in the CPUs.

The CPUs are also intended to ensure consistency with the overall guiding principles, land use policies, and other goals found in the City's General Plan. The CPUs' process requires amendments to the General Plan to incorporate the updated community plans as components of the General Plan's Land Use Element; adoption of a LDC ordinance that would repeal the Golden Hill Planned District Ordinance (GHPDO) zoning; amend the Mid-City Planned District Ordinance (MCPDO) to remove North Park from the regulations; and replace rezone areas within the CPUs with Citywide zones contained within the LDC; adopt land development code amendments to allow for conformance with the community plan policies; and a comprehensive update to the existing Impact Fee Studies (formerly known as Public Facilities Financing Plans) resulting in a new impact fee study for each community.

The summary of the original project (North Park and Golden Hill CPUs Final PEIR) in this addendum focuses on the North Park portion of the document, as the proposed project is located within the North Park Community Plan area and the environmental analysis contained in the Final PEIR is divided into two parts—an analysis for the North Park CPU and an analysis for the Golden Hill CPU.

The North Park Community Plan area (North Park community or North Park) comprises approximately 2,300 acres (approximately 3.6 square miles) and is located in the central portion of the City of San Diego and is in close proximity to Downtown San Diego. North Park abuts the community planning areas of Uptown on the west, Mission Valley on the north, Mid-City on the east, and Golden Hill and Balboa Park on the south. North Park is topographically defined by its mesa tops with canyon and hillside areas. The majority of North Park is relatively flat or gently sloping, with pronounced hillside areas along the northern boundary of the community, adjacent to Mission Valley and the southeastern portion of the community, adjacent to Golden Hill. North Park contains the neighborhoods of Altadena, Burlingame, Montclair, North Park, and University Heights.

The North Park Community Plan contains ten elements and an Introduction and Implementation chapter. The following elements are contained in the plan: Land Use; Mobility; Urban Design; Economic Prosperity; Public Facilities, Services and Safety; Recreation; Conservation and Sustainability; Noise; Historic Preservation; and Arts and Culture.

Complete Communities FEIR

Complete Communities is a program established by the City with a focus on four key areas: housing, mobility, parks, and infrastructure. Complete Communities includes planning strategies that work together to create incentives to build homes near transit, expand mobility choices and enhance opportunities for places to walk, bike, relax and play. These efforts ensure that all residents have access to the resources and opportunities necessary to improve the quality of their lives. The Complete Communities Program FEIR evaluates the potential environmental effects of the two programs: Complete Communities: Housing Solutions (CCHS) and Complete Communities: Mobility Choices (CCMC).

CCHS allows additional square footage and building height, which would allow for additional units beyond what is otherwise allowed in the respective base zone, Planned District Ordinance (PDO), or Community Plan, for development projects that provide affordable housing and contribute toward neighborhood-serving improvements. Existing height restrictions in the Coastal Zone in addition to height restrictions in proximity to airports would continue to apply. Additionally, projects that qualify

for participation in the CCHS program could be approved through a ministerial process, with certain exceptions unless site-specific conditions warrant a discretionary approval. In exchange for additional density, building square footage and height, CCHS requires all projects to provide new community-serving infrastructure improvements through either payment into a Neighborhood Enhancement Fund or by accommodating a public promenade that meets specified standards including minimum street frontage requirements.

The purpose of CCMC is to implement Senate Bill (SB) 743 by ensuring that new development mitigates transportation impacts based on vehicle miles traveled (VMT) to the extent feasible, while incentivizing development within the City's transit priority areas (TPAs) and urban areas. CCMC creates Mobility Zones (Mobility Zones 1, 2, 3, and 4), with Mobility Zones 1, 2, and 3 applying to the urban areas and Mobility Zone 4 applying to more suburban areas outside of the urban core. The CCMC program supports investments in active transportation and transit infrastructure—in the areas where that infrastructure is needed most—where the most reductions in overall vehicle miles traveled and greenhouse gas emissions reductions can be realized. The CCMC program applies citywide to any new development for which a building permit is issued.

For development within Mobility Zone 4, payment of an Active Transportation In-Lieu Fee is required by the Mobility Choices ordinance. This fee would be used to fund active transportation and VMT reducing infrastructure projects in Mobility Zones 1, 2, and 3. Consistent with SB 743's mandate to reduce VMT, the Active Transportation In-Lieu Fee would be used in areas that have the greatest capacity to realize VMT reductions within the City. Deed restricted affordable housing within Mobility Zone 4 that meets specified criteria would be exempt from payment of the Active Transportation In-Lieu Fee. Some industrial uses are exempt from paying the fee if they are located in a Prime Industrial Area, as designated by the City's General Plan.

The Complete Communities Program FEIR analyzes the impact of implementing the CCHS and CCMC programs. The impacts of both components, are analyzed in the FEIR.

II. SUMMARY OF PROPOSED PROJECT

The project is located at 2906–2920 University Avenue, within the North Park Community Plan area of the City of San Diego (City) in southwestern San Diego County (Figure 1, *Regional Location*, and Figure 2, *Aerial Photograph*). A Site Development Permit (SDP) would be required to allow the substantial alteration of a designated historic resource, known as the Edward and Emma Newman Building (Historic Resources Board Site #1482), and request a deviation from the Historical Resources Regulations. The project would retain and rehabilitate the designated historical resource building's west and south façades along University Avenue and Kansas Street, as well as the corner roof tower located at the northeast corner of University Avenue and Kansas Street. The remainder of the existing historic building and the adjacent building at 2920 University Avenue (which is not a designated historic resource) would be demolished to construct a 7-story, 108,000 SF, mixed-use project consisting of 92 multi-family residential dwelling units (including 16 affordable units), 4,900 SF of commercial space, and a subterranean parking garage containing 23 parking spaces. (Figure 3, *Site Plan*).

The project utilizes the CCHS Regulations and is subject to the applicable development standards of the existing CC-3-9 zone, with identified incentives and waivers in exchange for providing 16

affordable housing units. The project is within a Sustainable Development Area (SDA) and is zoned to allow for 29 dwelling units per acre. The project site is also located in a Transit Priority Area and CCMC – Mobility Zone 2.

Proposed incentives and waivers would allow the project to avoid the strict application of building articulation standards in the SDMC, along with other development regulations. The following entitled incentives and waivers, pursuant to the CCHS Regulations, would be applied to the project design:

- Within FAR Tier 3, the new maximum FAR shall be 6.5 (SDMC Section 143.1010(a)(3))
- Waiver of the maximum residential density (SDMC Section 143.1010(b) and 143.1010(d))
- Waiver of maximum structure height (SDMC Section 143.1010(c)(1))
- Waiver of maximum lot area (SDMC Section 143.1010(c)(2))
- Waiver of street frontage requirements (SDMC Section 143.1010(c)(3))
- Waiver of maximum lot coverage (SDMC Section 143.1010(c)(4))

In addition to the entitled waivers listed above, the project would also receive two bonus incentives pursuant to the CCHS Program SDMC Section 143.1010(h)(4)(A) as the project proposes 27 percent of pre-density dwelling units for lower income households. The two bonus incentives would allow for a deviation from SDMC Section 131.0455(d) requirements for private exterior open space, requiring each unit to contain at least 50 SF of private open space and a deviation from SDMC Section 131.0456(a) requirements for common open space which requires 2,300 SF total of space landscaped or improved with outdoor facilities. The project proposes 57 percent of units with the private open space instead of the 100 percent required and the project includes 1,674 SF of common open space when 2,300 SF is required.

Pursuant to SDMC Section 143.1010(i), the project also proposes two waivers in addition to the entitled waivers listed above. The applicant requests a waiver to deviate from SDMC Section 131.0522, *Transparency*, requiring a minimum of 50 percent of street wall area between 2 and 10 feet above the sidewalk be transparent with clear glass visible into a commercial or residential use. The project proposes 40 percent transparency along Kansas Street. The second waiver proposed is a deviation from SDMC Section 143.1025(a)(2), which requires at least one- 24-inch box canopy tree for each 20 feet of street frontage. The project proposes to provide 8 street trees in lieu of the 12 required.

Construction

Construction associated with the project would include partial demolition of the existing structures, asphalt, and concrete; site preparation work; excavation of subgrade parking; foundation work; and building construction. Grading for the 0.34-acre (14,591 square-foot) site would include approximately 6,254 cubic yards (CY) of cut and no fill, resulting in 6,254 CY of export. The maximum cut depth would be approximately 12 feet. Construction is expected to occur over an approximately 22-month period.

III. ENVIRONMENTAL SETTING

The project site is located at 2906–2920 University Avenue in the North Park community of San Diego and consists of a 0.34-acre property on Assessor's Parcel Number (APNs 446-412-10-00 and 446-413-11-00). The project site is developed and occupied by two, two-story (plus basement) structures, which are vacant. The structure located at 2906 and 2912 University Avenue is listed on the City's Register of Historical Resources (HRB #1482). Adjacent land uses include an apartment building to the north, Kansas Street to the west, University Avenue to the south, and an alley to the immediate east. The project site is located in a developed area served by existing public services and utilities.

The site is zoned Community-Commercial (CC-3-9) and designated as Community Commercial (0–109 dwelling units) and Community Village in the North Park Community Plan. The project site is located approximately 2.8 miles northeast of the San Diego International Airport (SDIA). The project site is within the Airport Influence Area (AIA) for the SDIA, Review Area 2, and is subject to the requirements of SDMC Section 132.1501, et. seq., and applicable adopted Airport Land Use Compatibility Plan. Additionally, the project site is located within the following overlay and planning areas: Federal Aviation Authority Part 77 Noticing Area; Complete Communities Housing Solutions FAR Tier 3: 6.5 Floor Area Ratio; Complete Communities Mobilities Choices – Mobility Zone 2; Transit Area Overlay Zone; Parking Standards Transit Priority Area; Transit Priority Area; Medium Affordable Housing Parking Demand; Sustainable Development Area; and North Park Business Improvement District.

IV. ENVIRONMENTAL DETERMINATION

The City previously prepared and certified the North Park and Golden Hill CPUs Final PEIR Environmental Impact Report (EIR) No. 380611/SCH No. 2013121076 and the Complete Communities Program FEIR SCH No. 2019060003. Based on all available information in light of the entire record, the analysis in this Addendum, and pursuant to Section 15162 of the State California Environmental Quality Act (CEQA) Guidelines, the City has determined the following:

- There are no substantial changes proposed in the project that will require major revisions of the previous environmental document due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
- Substantial changes have not occurred with respect to the circumstances under which the project is undertaken that will require major revisions of the previous environmental document due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- There is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous environmental document was certified as complete or was adopted, shows any of the following:

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

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

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

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

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

V. IMPACT ANALYSIS

The following includes the project-specific environmental review pursuant to the CEQA. The analysis in this document evaluates the adequacy of the EIRs relative to the project.

Land Use

North Park CPU PEIR

The North Park CPU PEIR concluded that implementing the North Park CPU would not result in impacts related to conflicts with applicable local and regional land use plans, including the City's General Plan, City of Villages strategy, San Diego Forward- the Regional Plan, or the City's Environmentally Sensitive Lands (ESL) Regulations and LDC. Therefore, impacts were identified as less than significant.

The North Park CPU PEIR identified less than significant land use impacts associated with the development or conversion of open space or physical division of an established community. Community connectivity would be enhanced by provisions in the proposed North Park CPU that improve pedestrian and transit amenities. Impacts are identified in the PEIR as less than significant.

The North Park CPU PEIR identifies less than significant land use impacts associated with the provisions of the City's Multiple Species Conservation Program (MSCP) Subarea Plan or other approved habitat conservation plans because ESL Regulations would limit development encroachment into sensitive biological resources.

The North Park community is within the SDIA AIA; however, the North Park CPU PEIR identifies less than significant impacts associated with compatibility with the adopted Airport Land Use Compatibility Plan (ALUCP). Future projects would be required to obtain Airport Land Use

Commission consistency determinations, as necessary, which would ensure future projects are reviewed for consistency with the SDIA ALUCP.

Complete Communities FEIR

CCHS and CCMC Regulations are consistent with the City's overarching policy and regulatory documents, including the General Plan and SDMC. The Complete Communities FEIR analyzed compliance with San Diego Forward: The Regional Plan and determined that the CCHS and CCMC Regulations facilitate the implementation of existing land use plans across multiple planning areas throughout the City, consistent with the goals of the Regional Plan. Therefore, the adoption and implementation of the Complete Communities Program would not generate any conflict with smart growth strategies. The Complete Communities FEIR also analyzed compliance with the City's General Plan and found that the Complete Communities Program would allow multifamily development with an affordable component to occur within TPAs at densities and heights beyond what is specifically identified in the applicable community plan. Thus, the Complete Communities Program implements the General Plan City of Villages strategy, by allowing increased densities for multifamily residential development to occur in TPAs. Therefore, the Complete Communities FEIR identifies less than significant impacts associated with applicable goals objectives, or guidelines of the General Plan and other applicable plans and regulations.

The Complete Communities FEIR concluded that the project areas do not contain land designated as Prime Farmland. The Complete Communities Program does not include the development or redesignation of open space; therefore, there would be no impacts associated with the development or conversion of General Plan- or community plan-designated Open Space or Prime Farmland, and the impacts would, therefore, be less than significant.

The Complete Communities FEIR concluded that areas within or adjacent to the Multi-Habitat Planning Area (MHPA) and Vernal Pool Habitat Conservation Plan (VPHCP) preserve lands would be subject to the ESL Regulations, which would ensure no conflicts would occur in relation to the MSCP Subarea Plan or VPHCP. Additionally, development adjacent to MHPA and VPHCP preserve lands would be subject to the Land Use Adjacency Guidelines in MSCP Subarea Plan Section 1.4.3 and Avoidance and Minimization Measures VPHCP Section 5.2.1. Thus, impacts related to conflicts with the MSCP Subarea Plan and VPHCP would be less than significant.

The Complete Communities FEIR determined that the implementation of the Complete Communities Program would not result in impacts associated with existing ALUCPs, because future development would continue to be limited by airport land use compatibility policies and regulations. Until the policies of the SDIA and Naval Outlying Landing Field (NOLF) Imperial Beach ALUCPs are incorporated into the City's Airport Land Use Compatibility Zone (ALUCOZ), future multifamily development within TPAs located within SDIA or Naval Outlying Field (NOLF) Imperial Beach AIA Review Area 1 would be subject to ALUC review of the development's consistency with ALUCP policies for all compatibility factors; projects within AIA Review Area 2 for these airports will be subject to review against overflight and airspace protection policies and may require Federal Aviation Administration (FAA) notification (if the proposed development project's maximum height exceeds the FAA's Part 77 Notification Surface) and/or recordation of an avigation easement and/or overflight notification; and projects within AIA Review Area 1 for SDIA will also be subject to the City's Airport Approach Overlay Zone and Airport Environs Overlay Zone, which provides supplemental

regulations for property surrounding SDIA. After incorporation of the policies of the SDIA and NOLF Imperial Beach ALUCPs into the ALUCOZ, development allowed by the Complete Communities Program would be subject to the requirements of the ALUCOZ. The Complete Communities FEIR identifies less than significant impacts.

Project

The project would be consistent with the General Plan and City of Villages Strategy by providing a variety of multifamily housing unit configurations, including 16 affordable units, within a Parking Standard Transit Priority Area (PSTPA) and in a TPA within walking distance to multiple transit stops.

The project site is zoned Commercial (CC-3-9) and is designated Community Commercial (0-109 du/ac) and Community Village by the North Park Community Plan. The purpose of the Community Commercial designation is to provide high residential densities within a mixed-use setting. The Community Commercial (0-109 du/ac) North Park Community Plan designation allows for up to 109 du/ac, within a FAR of 3.0, when residential is contained within the mixed-use development. The project is located within a Sustainable Development Area (SDA).

The project utilizes the City's CCHS Program and would be processed in accordance with the CCHS Regulations and under the applicable development standards of the underlying CC-3-9 zone. This program grants the applicant within a FAR Tier 3 a new maximum 6.5 FAR-based density in exchange for 40 percent affordable housing, a list of entitled waivers to specific development regulations, two bonus incentives, and unlimited waivers. As outlined in the Project Description, the project is utilizing two incentives to deviate from SDMC Section 131.0455(d) requirements for private exterior open space requiring each unit to contain at least 50 SF of private open space and a deviation from SDMC Section 131.0456(a) requirements for common open space which requires 2,300 SF total of space landscaped or improved with outdoor facilities. The project proposes 57 percent of units with the private open space instead of the 100 percent required and the project includes 1,674 SF of common open space when 2,300 SF is required. The project site's small lot size and infill nature limits the availability of space to provide recessed balconies for some units. Additionally, there is insufficient space to provide the required common open space. To compensate, the project would provide a common open space and an interior clubhouse on level 7 of the proposed structure for tenants and guests.

The applicant requests a waiver to deviate from SDMC Section 131.0522, *Transparency*, requiring a minimum of 50 percent of street wall area between 2 and 10 feet above the sidewalk be transparent with clear glass visible into a commercial or residential use. The project proposes 40 percent transparency along Kansas Street as the project must preserve and rehabilitate the existing historical façade and cannot modify the street wall area to be more transparent. The second waiver proposed is a deviation from SDMC Section 143.1025(a)(2), which requires at least one- 24-inch box canopy tree for each 20 feet of street frontage. The project proposes to provide 8 street trees in lieu of the 12 required street trees due to the existing location of utility structures present on University Avenue and the need to retain three existing street trees.

The project is designed to meet the North Park CPU Land Use Element's goals of "high-quality development with medium to high residential density, centrally located within the community to form an attractive and vital central area." The project site's underlying base zone, CC-3-9, is a high-

density designation allowing one dwelling unit per 400 square feet per lot area, yielding a pre-density base of 37 units. The proposed development of 92 dwelling units would meet the Land Use Element's goal for high-density development on the project site.

The project would not adversely affect North Park's land use, and would reinforce and implement North Park urban design guidelines, including:

- new publicly accessible paseos and enhancing public walkways (UD-2.1);
- articulated facades, providing Mixed-Use corridors, emphasizing pedestrian orientation and ground floor entrance to ground floor storefront (UD-3.2, and UD-3.4 through UD-3.10);
- distinct building forms and the corner development encourages pedestrian activity and accentuates the intersection, as well as including underground parking (UD-3.15 and UD-3.16);
- walkable mixed-use center with dense residential use, continuance of walkways and incorporation of street trees, no office use, and including ground floor commercial use (UD-3.23 through UD-3.27); and
- adaptive reuse to reinforce history of area and incorporating the existing historical element (UD-3.74 and UD-3.75).

The project would support North Park's revitalization goals for its business districts while respecting potential impacts to adjacent neighborhoods through adaptive re-use of a vacant historic resource. The project would be consistent with North Park's historic preservation goals by retaining and rehabilitating the historical resource's street-facing façades while adding needed housing, bringing future residents closer to employment opportunities and neighborhood amenities. The project implements the land use plan's goals through buttressing the western edge of North Park's Community Village, centered at 30th Street and stretching along University Avenue's mixed-use transit corridor, with additional residential units, enhancing the area's livability and walkability. The project supports North Park's Smart Growth vision by offering new in-fill housing opportunities for future residents and employment options with the first-floor commercial space. The project balances Smart Growth goals within the historic preservation goals of the community plan by providing a compact, higher-density development that provides new housing in a mixed-use development within walkable areas near existing transit, while maintaining the historic façade of the building. The project would not conflict with the environmental goals, objectives, or guidelines of the Community Plan and as a result, cause an indirect or secondary environmental impact.

The project site is fully developed, in an urbanized community, and does not contain designated open space or prime farmland. Thus, the project would not have an impact on designated open space or prime farmland. The site does not contain environmentally sensitive lands and therefore not subject to the ESL Regulations. The project site is outside of and not adjacent to the MHPA and would not have impacts on the MHPA. This site is developed and urbanized, and no vernal pools are mapped within or adjacent to the project site. Therefore, the project would be consistent with the MSCP and VPHCP. The project site is in the AIA Review Area 2 for the SDIA, where only airspace protection and overflight policies and standards apply. The FAA has issued a determination of no

hazard to air navigation for the project (FAA 2023a, 2023b, 2023c, 2023d); thus, the project would not result in uses that are incompatible with the adopted airport land use plan.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the conclusions identified in the North Park CPU PEIR or the Complete Communities FEIR. The project would not result in any new significant impacts, nor a substantial increase in the severity of impacts from those described in the North Park CPU PEIR or the Complete Communities FEIR.

Visual Effects and Neighborhood Character

North Park CPU PEIR

The analysis in the North Park CPU PEIR identifies less than significant impacts on scenic views and scenic vistas with the implementation of applicable policies that would protect public views. The PEIR identifies future development as largely in-fill development that would fit into the existing urban developed setting and would not result in new obstructions to view corridors.

The North Park CPU PEIR identifies less than significant impacts associated with neighborhood character. While implementation of the proposed North Park CPU and associated discretionary actions would result in intensification of the CPU area, the proposed North Park CPU includes a number of policies that would ensure development is context-sensitive and enhances the character of the surrounding area. Where there are transitions between residential and mixed-use or commercial areas, specific transition standards would be applied to minimize adverse impacts.

Impacts associated with the loss of landmark or mature trees, significant landform alteration, and light and glare are identified as less than significant in the North Park CPU PEIR.

Complete Communities FEIR

The Complete Communities FEIR states that the Complete Communities Program would apply citywide within TPAs in zones that allow for multifamily housing. In exchange for new development that provides affordable housing units and neighborhood-serving infrastructure improvements, the Complete Communities Program would allow additional building square footage and height beyond what is otherwise allowed in the base zone, PDO, or applicable Community Plan. Height incentives would only apply outside the City's Coastal Zone. Within the Coastal Zone, the existing 30-foot height limit would continue to apply, which would limit the maximum densities that could be accommodated in coastal areas and reduce the potential for adverse impacts to neighborhood character that could result from structure heights that are greater than what currently exists. Within the Coastal Zone, FAR incentives would still apply; however, the ability to achieve the highest FAR would be limited by the 30-foot height limit. While the 30-foot height limit would restrict building square footage, the FAR incentives within the Coastal Zone could result in development that is inconsistent with the existing neighborhood character. Outside of the Coastal Zone, height restrictions related to development in proximity to airports would continue to apply, which could limit the height and intensity of development that could occur within areas proximate to airports. Furthermore, market and construction factors could contribute to height limitations.

Transportation infrastructure improvements associated with the CCMC Regulations would have a less than significant impact related to scenic vistas or views. Development associated with the CCHS Regulations located outside of the Coastal Zone could adversely impact public scenic vistas or views due to height incentives that would allow for structure height in excess of existing base zone, PDO, or applicable Community Plan. Thus, at this programmatic level of review, and without project-specific development plans, impacts associated with scenic vistas and viewsheds would be significant and unavoidable.

Under the Complete Communities Program, development of a certain size would be required to provide public amenities. Future development would also be required to incorporate design features that enhance neighborhood character and minimize adverse impacts associated with increased bulk, scale, and height. Building materials, style, and architectural features would be reviewed to ensure the character of development meets required development standards.

Development would also be required to adhere to the City's landscape regulations, which would support neighborhood compatibility. Nevertheless, implementation of the Complete Communities Program could result in development at densities and heights that could substantially alter the existing neighborhood character. While the Complete Communities Program is intended to create a more vibrant, pedestrian-oriented community with transit supportive development, implementation of the proposed ordinance could result in a substantial change to the existing character within the project areas. Thus, at this programmatic level of review, impacts associated with neighborhood character would be significant and unavoidable.

While the City has policies related to tree preservation in place that are intended to preserve distinctive, landmark, and mature trees to the extent practicable, it is possible that future development could nonetheless adversely impact such trees. At the programmatic level of review conducted for the Complete Communities FEIR and without project-specific development plans, impacts associated with the loss of any distinctive or landmark trees or any stand of mature trees would be significant and unavoidable.

The Complete Communities FEIR concluded that development associated with CCHS could result in changes to existing landforms depending on the constraints and slope associated with a particular project site. While existing canyons and slopes throughout the project areas are largely protected from development due to their status as MHPA, the project sites could contain steep slopes or other topographical features that could be impacted by development. The ESL Regulations would protect steep hillsides (defined as hillsides at least 50 feet deep with a slope of 25 percent or greater).

Should a proposed project include impacts to steep hillsides, the project would require a Site Development Permit, which would trigger subsequent environmental review, in order to address potential impacts to ESL protected slopes. Transportation infrastructure resulting from implementation of the CCMC Regulations is not anticipated to result in changes to the existing landform because improvements are anticipated to occur within public rights-of-way, and/or along existing developed streets. Given the developed nature of such areas, landform alteration is not anticipated.

While existing protections are in place to preserve the City's canyons and steep slopes, specific development proposals and grading quantities were not known at the time of analysis of impacts

associated with the Complete Communities was conducted. It is possible that future development under the Complete Communities Program could result in substantial landform alteration. Even with future discretionary reviews for projects that impact ESL-defined steep slopes, impacts could be significant. Therefore, the Complete Communities FEIR determined the program would result in significant and unavoidable landform alteration impacts.

Sources of light within the project areas where the Complete Communities Program would be applied include those typical of an urban community, such as building lighting for residential and commercial land uses, roadway infrastructure lighting, and signage. Future development associated with the Complete Communities Program would introduce new residential interior and exterior lighting, parking lot lighting, commercial signage lighting, and lamps for streetscape and public recreational areas. Transportation infrastructure associated with the CCMC Regulations could also include additional roadway lighting within or along public rights-of-way. Future development would be required to comply with the applicable outdoor lighting regulations of SDMC Section 142.0740 et seq., which would require development to minimize negative impacts from light pollution including light trespass, glare, and urban sky glow. Compliance with these regulations would preserve enjoyment of the night sky and minimize conflict caused by unnecessary illumination. New outdoor lighting fixtures must minimize light trespass in accordance with the California Green Building Standards Code (CAL Green), where applicable, or otherwise shall direct, shield, and control light to keep it from falling onto surrounding properties.

Future development associated with the Complete Communities Program would also be required to comply with SDMC Section 142.0730 to limit the amount of reflective material on the exterior of a building that has a light reflectivity factor greater than 30 percent to a maximum of 50 percent.

Additionally, per SDMC Section 142.0730(b), reflective building materials are not permitted where it is determined that their use would contribute to potential traffic hazards, diminish the quality of riparian habitat, or reduce the enjoyment of public open space. Therefore, through regulatory compliance, the proposed project would not create substantial light or glare that would adversely affect daytime or nighttime views in the area, and impacts would be less than significant.

Project

Pursuant to Public Resources Code (PRC) Section 21099(d)(1), “Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment.” These provisions apply to projects located on a “… lot within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from parcels that are developed with qualified urban uses … and it is located within 0.5 miles of a major transit stop.” Based on the provisions of the state law, the project is proposed on an urban infill site located in a transit priority area and is exempt from findings of significance related to aesthetic effects, including views, visual quality, neighborhood character, and light and glare. The discussion below further outlines the project’s consistency with the conclusions in both the North Park CPU PEIR and Complete Communities FEIR.

The project site is not located within or adjacent to a designated scenic vista or a view corridor that is identified in the North Park Community Plan. Since none exist and the site is not located within

the Coastal Overlay Zone, the project would not adversely impact public scenic vistas or views due to height incentives that would allow for structure height in excess of existing base zone, PDO, or applicable Community Plan pursuant to the Complete Communities Program. Therefore, the project would not result in a substantial adverse effect on a scenic vista or public view corridor as described in the North Park CPU PEIR and Complete Communities FEIR.

The project would be consistent with the University Avenue specific North Park Urban Design policies encouraging high-density mixed-use development; consistent with UD-3.23 pedestrian oriented street improvements; consistent with UD-3.25 and UD-3.26 by providing ground floor University Avenue adjacent commercial space; and consistent with UD-3.28 and UD-3.29 by providing no office space. The site is not surrounded by any parcels zoned for residential development, thus the bulk and scale transition plane per North Park Urban Design policies of UD-3.39 and UD-3.40 are not applicable and the project site plan is consistent with UD-3.41 which dictates that higher scale structures should be oriented toward University Avenue.

Additionally, the project design incorporates modulation, façade articulation, and offsetting planes to help reduce visual bulk and provide visual interest, consistent with North Park Urban Design policy UD-3.1; avoids uninterrupted blank walls along building façades consistent with North Park Urban Design policy UD-3.2; provides a building with pedestrian oriented ground floor entrances, consistent with North Park Urban Design policy UD-3.8; provides a building that address corners as focal points with features that encourage pedestrian activity and accentuate the community's major intersections, consistent with North Park Urban Design policy UD-3.15. Along University Avenue, in the blocks immediately adjacent to the project, uses are primarily commercial with some mixed-use buildings, with structures ranging in stature from single story to five stories, with the majority of the structures being single- and two-story. Residential areas surround the University Avenue corridor in the project vicinity, with adjacent uses to the north of the project site consisting of single-story and multi-story, multifamily residential uses, ranging up to 5 stories. Buildings in North Park include a range of architectural styles, and infill development has introduced new architectural forms and styles with no specific theme. The project site is currently developed with two existing two-story buildings. The surrounding neighborhood consists of a variety of commercial, residential, and mixed-use buildings. The building adjacent to the north of the project site is three stories, while the buildings directly west and east of the project site, which front University Avenue, are of similar height to the existing on-site building, with two stories. To the south of the project site, across University Avenue, buildings are generally one to two stories. Therefore, the project's building height would be greater than the immediate adjacent urban development; however, the structure would not be out of character with the multifamily residential and mixed-use buildings in the surrounding areas and the North Park community as a whole.

Despite the intensification of the on-site urban form, the project would preserve the historical façade of the building facing Kansas Street and University Avenue, maintaining the aesthetics of the structure on the ground floor level and part of the second floor facing both streets. The retained façade would be painted white and would maintain the historic clay roof tile. In addition to maintaining the historic façade, the upper elevations of the building façade fronting the public rights-of-way would be composed of offsetting planes that would provide visual relief by insetting or projecting surfaces (planes). Stories 2 through 7 of the building façade facing both streets would

have a 6-foot setback away from the ground floor historic building façade (refer to Figure 4, *Renderings*).

With regard to zoning compliance, the project would develop 92 multifamily units and approximately 4,900 SF of commercial uses, in a 7-story, 108,000 SF building. The project would be processed in accordance with the CCHS Regulations and under the applicable development standards of the existing CC-3-9 zone, with identified incentives and waivers incorporated. Proposed incentives and waivers would allow the project to avoid the strict application of building articulation standards in the SDMC, along with other development regulations unrelated to visual character. Incentives and waivers applied to the project under CCHS that are applicable to visual resources include the waiver of maximum structure height, maximum lot area, street frontage requirements, maximum lot coverage, and waivers to deviate from SDMC Section 131.0522 for transparency of street wall requirements and street frontage tree requirements. The project proposes a waiver related to SDMC Section 131.0522, which requires a minimum of 50 percent wall area between 2 and 10 feet above the sidewalk to be transparent. The retention of the historic façade limits the ability to provide 50 percent transparency, with 40 percent transparency proposed. The project would conform to building articulation regulations of the Commercial zone per SDMC 131.0554. Another waiver is to deviate from SDMC requirements for at least one 24-inch box canopy tree for each 20 feet of street frontage. The project proposes to provide 8 trees in lieu of the 12 required street trees due to the existing utility structures on University Avenue and the need to retain 3 existing street trees.

The project includes a Landscape Plan that follows the guidelines and design recommendations of the North Park Community Plan, City Landscape Guidelines, and SDMC requirements, with the exception of one proposed waiver. The Landscape Plan utilizes ground level street trees such as Brisbane Box and Chinese Pistache trees, relating to and enhancing the architecture. A deviation from SDMC Section 143.1025(a)(2) is requested, which requires at least one 24-inch box canopy tree for each 20 feet of street frontage. The project proposes to provide 8 street trees in lieu of the 12 required due to the existing location of utility structures present on University Avenue and the need to retain three existing street trees. The amenity spaces are designed with simple modern forms and quality materials. The project would not result in a negative effect on the visual quality of the streetscape area and be consistent with the North Park CPU PEIR and Complete Communities FEIR.

The City Arborist requires the project to maintain three existing trees, including one Brisbane Box street tree on Kansas Street, and one American Sweet Gum street tree and one Chinese Pistache street tree on University Avenue. The project would not result in the loss of any distinctive or landmark trees, or any stand of mature trees. No impact to landmark or mature trees would occur as described in the North Park CPU PEIR and Complete Communities FEIR.

The project site is in an infill location with level terrain and existing structures. The site is not located in a canyon or within steep slopes where ESL Regulations would apply. No modifications to natural topography or steep slopes governed by the ESL Regulations would be required to implement the project. No impact on landforms or steep slopes would occur as analyzed in the North Park CPU PEIR and Complete Communities FEIR.

The proposed project is located in an urbanized area, with existing on-site structures and surrounding uses containing lighting; however, the project would introduce additional light fixtures

and may contribute to increases in light in the project area. Additional glare would be minimized by the variety of materials and limited glazing being used on the façade of the structure. The project would comply with the applicable outdoor lighting regulations of SDMC, CAL Green requirements, or otherwise shall direct, shield, and control light to keep it from falling onto surrounding properties. Therefore, project impacts associated with light and glare would be less than significant consistent with the North Park CPU PEIR and Complete Communities FEIR.

Furthermore, while the Complete Communities Program is intended to create a more vibrant, pedestrian-oriented community with transit supportive development, implementation of the Complete Communities regulations could result in a substantial change to the existing character within the project area. The project would provide residential units at higher densities which may contribute to the significant and unavoidable impact associated with the substantial alteration to the existing or planned character of the area as identified in the Complete Communities FEIR.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the conclusions identified in the North Park CPU PEIR or the Complete Communities FEIR. The project would not result in any new significant impacts, nor a substantial increase in the severity of impacts from those described in the North Park CPU PEIR or the Complete Communities FEIR.

Transportation/Circulation

North Park CPU PEIR

Significant cumulative impacts on 8 intersections, 43 roadway segments, 18 freeway segments, and 3 ramp meters are identified in the North Park CPU PEIR using Level of Service (LOS) thresholds for assessing impacts under CEQA. Mitigation measures were identified to reduce impacts; however, not all identified measures were feasible, and the impact is identified in the PEIR as a significant and unavoidable impact. The improvements that are ultimately recommended as part of the North Park CPU are included in the Impact Fee Study (IFS). However, in most cases, the improvements that would mitigate or reduce vehicular impacts were not recommended as part of the North Park CPU in order to maintain consistency with the overall mobility vision and other policies of the North Park CPU. Mitigation measures TRANS 6.3-5, TRANS 6.3-7, TRANS 6.3-13, TRANS 6.3-18 are included in the North Park IFS and remaining measures would not be implemented. The North Park CPU PEIR indicates that is not likely that mitigation measures not included in the IFS would be implemented based on the lack of a funding mechanism and in some cases due to inconsistency of the recommended measure with the mobility goals of the proposed North Park CPU. Further, mitigation included in the IFS cannot be guaranteed because the IFS funding would not be adequate to fully fund the necessary improvements, and there is no guarantee that they would be constructed prior to an impact occurring. Impacts to Caltrans facilities (freeway segments and ramps) would remain significant and unmitigated because the City cannot ensure that the mitigation necessary to avoid or reduce the impacts to a level below significance would occur. Cumulative transportation impacts remain significant and unavoidable.

The North Park CPU PEIR identified less-than-significant impacts associated with consistency with adopted policies, plans, or programs supporting alternative transportation. The North Park CPU and

associated discretionary actions would provide policies that support improvements to pedestrian, bicycle, and transit facilities.

Complete Communities FEIR

California implemented SB 743 to modernize transportation analysis and transition lead agencies from analyzing traffic impacts under CEQA from a congestion-based LOS threshold to a VMT threshold designed to assist the state in meeting its greenhouse gas emissions targets. SB 743, as codified in Public Resources Code Section 21099(b), provides that, automobile delay, as described *solely* by LOS or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment, except for transportation projects.

The Complete Communities FEIR adopted new VMT CEQA significance thresholds for transportation that implemented SB 743. The Complete Communities FEIR concludes that residential or commercial employment development in areas with VMT efficiency at or below 85 percent of the base year regional average would be presumed to have a less than significant impact. Future development of similar types would be expected to have VMT levels similar to those of existing development in that area. Impacts in less efficient VMT per capita areas (greater than 85 percent of the regional average) would remain significant and unavoidable. Although development under the CCHS Regulations combined with improvements resulting from the CCMC Regulations are anticipated to result in the implementation of infrastructure improvements that could result in reductions in per capita VMT, at a program level, it could not be determined whether those improvements would sufficiently reduce potentially significant VMT impacts to below the threshold of significance. Thus, the PEIR concluded that VMT impacts associated with development under the Housing Solutions Program located in less VMT efficient areas would be significant and unavoidable.

The Complete Communities FEIR concluded that, overall, the Complete Communities Program would support improved pedestrian, bicycle, and transit facilities and foster increased safety for all alternative modes by facilitating the development of high-density multifamily residential land uses close to existing transit areas. Additionally, the CCMC Regulations would further support multi-modal opportunities within Mobility Zones 1, 2, and 3 consistent with City policies. Thus, impacts related to conflicts with adopted policies, plans, or programs supporting transportation are identified in the Complete Communities FEIR as less than significant.

Project

At the time of the adoption of the North Park CPU PEIR, CEQA required a transportation analysis to evaluate impacts based on traffic load and capacity of the street system using a LOS standard. Subsequently, CEQA was revised to prohibit use of LOS as the measure of the significance of transportation/circulation impacts. CEQA now requires the evaluation of transportation/circulation impacts using the metric of VMT, with the intent to better align CEQA practices with statewide sustainability goals related to efficient land use, greater multi-modal choices, and GHG reductions and updated how transportation impacts are evaluated under CEQA. Currently, the City's CEQA Guidelines require examination of whether a project would result in VMT exceeding thresholds identified in the City's Transportation Study Manual (TSM; City of San Diego 2022). The project is located in a Transit Priority Area and CCMC – Mobility Zone 2. The Complete Communities FEIR used VMT to analyze transportation impacts and that analysis is applied to the project below.

VMT Assessment

The project was evaluated under the City's TSM VMT Screening Criteria for land use development projects and a VMT Assessment (LLG 2025a; Appendix A) was prepared to assess potential transportation VMT impacts. As a mixed-use project, the project is required to evaluate VMT for each land use within the project and, therefore, the project-specific transportation review addresses the project's VMT impact using the SANDAG Series 14 (ABM 2+, Base Year 2016) screening map for the residential land use as well as the screening criteria based on the proposed land use and expected trip generation for the commercial land use per the TSM.

Specifically, the screening criteria for determining if a project would result in a significant VMT impact require residential projects to be located in a census tract that has a VMT/capita of below 85 percent of the regional average. For the commercial component of the project, the screening criteria for locally serving retail is a project having 100,000 SF gross floor area or less and, demonstrates through a market area study that the market capture area is approximately 3 miles or less and serves a population of roughly 25,000 people or less.

The project proposes 92 multi-family dwelling units at a weekday trip generation rate of 6 trips / dwelling unit and approximately 4,900 SF of ground-floor commercial, assumed to be high-turnover sit-down restaurant at a rate of 130 trips per thousand square feet. Therefore, the project would be expected to generate approximately 1,189 average daily traffic (ADT), with 95 AM peak hour trips (35 inbound and 60 outbound) and 101 PM peak hour trips (66 inbound and 35 outbound).

As detailed in the project's VMT Assessment, the project is located in Census Tract 13 and would be expected to generate 13.8 VMT per capita, which is 73.3 percent of the regional average VMT per capita of 18.9. Therefore, the residential component of the project is screened out from a full VMT analysis as it is below the significance threshold of 85 percent of the regional average. For the commercial component, a map displaying restaurant locations along with population data within a 3-mile radius was examined. It was determined that 614 restaurants serve a population of 297,830 persons, resulting in a population per restaurant of 485 people. As the proposed commercial uses are anticipated to serve 485 people, it is below the threshold of 25,000 people. Thus, the entire project would be screened out from having to conduct a detailed VMT analysis and is presumed to have a less than significant transportation VMT impact per City thresholds.

Local Mobility Analysis

A Local Mobility Analysis (LMA; LLG 2025b; Appendix B) was prepared to evaluate the operational effects of the development project on mobility, access, circulation, and related safety elements in the project study area consistent with the City's TSM. Under Opening Year 2028 with project scenario, the project is not anticipated to result in transportation effects requiring improvements at any of the study intersections or street segments analyzed in the LMA and would not cause any study area intersection turning movements to exceed the storage capacity.

The project would implement transportation amenities required per Section 142.0538 of the SDMC and included as conditions of project approval. A minimum of two points worth of transportation amenities per SDMC 142.0528(c) is required to use the zero minimum parking requirement per SDMC 142.0528(a). To meet this requirement, the project would provide co-working space available

for residents of at least 500 SF and provide private or semi-private workspaces. The project would also provide a bicycle repair station located along University Avenue in lieu of a sidewalk widening pursuant to SDMC 143.1025(A)(1). Further, the project is located in a TPA and is required to provide five points worth of VMT reduction measures for each non-residential land use consistent with CCMC Regulations (SDMC Section 143.1103(b)). The project would provide the following VMT reduction measures:

- One on-site bicycle repair station
- One on-site multi-modal information kiosk located within the residential lobby entry; and
- Short-term bicycle parking spaces that are available to the public, at least 10 percent beyond minimum requirements. The project is required to provide a minimum of two short-term bicycle parking spaces based on the SDMC Section 142.0530(e)(1). Additional short-term bicycle parking spaces are being provided in excess of the minimum requirement with four spaces provided.

Completion of the LMA and associated improvements ensures project consistency with City operational standards for surrounding roadways and implements roadway and intersection improvements as required by the TSM (City of San Diego 2022). Impacts associated with VMT would be less than significant.

The project is in a TPA and Transit Area Overlay Zone in the CC-3-9 zone. Bus routes in the vicinity of the project site include routes 2, 6, and 7. The nearest bus stop to the project site for Route 2 is located at a walking distance of approximately 200 feet from the project, while the nearest stop for Routes 6 and 7 is located approximately 90 feet from the project. As such, the project is proposed in a transit-rich area near high-quality bus service. As noted above, the project design would implement several alternative transportation features that would encourage residents and users to walk, bike, or use transit to and from the project site. In addition to the transportation amenities and VMT Reduction Measures, the project would implement a formal ride-sharing program that matches individuals and encourages carpooling and display bus schedules and maps prominently in the building lobby to inform residents and employees of the available transit routes, transit schedules, and the nearest transit stop. Therefore, the project would be consistent with the City's adopted policies, plans, or programs supporting alternative transportation.

Project access to the site would be located at the parking entrance on the alleyway along the eastern boundary of the project site. There are no design features proposed that could increase hazards in the vicinity of the project site. Additionally, the project would not result in inadequate emergency access as the project meets requirements for fire and emergency access, and the project is served by existing major roadways that have access to major freeways. Therefore, the project would not substantially increase hazards due to a design feature or result in inadequate emergency access.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the conclusions identified in the North Park CPU PEIR or the Complete Communities FEIR. The project would not result in any new significant impacts, nor a substantial increase in the severity of impacts from those described in the North Park CPU PEIR or the Complete Communities FEIR.

Air Quality/Odor

North Park CPU PEIR

The North Park CPU PEIR identifies significant and unavoidable air quality impacts associated with the implementation of the applicable air quality plan. Future operational emissions associated with the North Park CPU would be greater than anticipated for future operational emissions under the adopted Community Plan, and emissions of ozone precursors (reactive organic gases (ROG) and nitrogen oxides (NOx) would be greater than what is accounted for in the Regional Air Quality Standards (RAQS). Thus, the PEIR identifies a conflict between the North Park CPU and implementation of the RAQS. Because the significant air quality impact stems from an inconsistency between the proposed North Park CPU and the adopted land use plans upon which the RAQS was based, the only measure that can lessen this effect is the revision of the RAQS and State Implementation Plan (SIP) based on the revised proposed North Park CPU (Mitigation Measure AQ 6.4-1). The impact remains significant and unavoidable.

Operational emissions associated with the North Park CPU are identified as greater for all pollutants when compared to the adopted Community Plan. Additionally, the North Park CPU PEIR identifies emissions in excess of project-level thresholds as a result of North Park CPU implementation. Thus, the North Park CPU PEIR identifies a potentially significant impact on regional air quality. Mitigation Measure AQ 6.4-2 requires development within the North Park CPU that would significantly impact air quality (individually or cumulatively) to be conditioned with all reasonable mitigation to avoid, minimize, or offset the impact; however, because project-level emissions from future developments is not available and emissions from future developments cannot be guaranteed to be below a level of significance, impacts remain significant and unavoidable, as identified in the North Park CPU PEIR.

Air quality impacts associated with the exposure of sensitive receptors to substantial pollutant concentrations and objectionable odors were identified as less than significant impacts in the North Park CPU PEIR.

Complete Communities FEIR

The Complete Communities FEIR states that the California Clean Air Act (CCAA) requires air basins that are designated nonattainment of the California Ambient Air Quality Standards (CAAQs) for criteria pollutants to prepare and implement plans to attain the standards by the earliest practicable dates. The two pollutants addressed in the SIP and RAQs are ROG and NOx, which are precursors to the formation of ozone (O_3). The SIP and the RAQS, which in conjunction with the transportation control measures (TCMs), serve as the air quality plans of the San Diego Air Basin (SDAB). The basis for the SIP and RAQS is the distribution of population in the region as projected by SANDAG. The San Diego Air Pollution Control District (SDAPCD) refers to approved general plans to forecast, inventory, and allocate regional emissions from land use and development-related sources. These emissions budgets are used in statewide air quality attainment planning efforts. As such, proposed development at an intensity equal to or less than the population growth projections and land use intensity described in their located land use plans are inherently consistent.

The Complete Communities Program is intended to incentivize high-density multifamily residential development where affordable housing and community-serving amenities are provided within TPAs.

The Complete Communities Program could result in a redistribution of the density that was evaluated within recent community plan update EIRs. Densities could shift to focus more within TPAs, but this shift is not anticipated to exceed the overall community plan densities that were evaluated in the respective community plan update EIRs. However, in project areas within communities that have not undergone a recent comprehensive community plan update, it is possible that the Complete Communities Program could result in additional new development.

Recent community plan update EIRs recognized that as the community plans were updated, newly designated land uses would be forwarded to SANDAG for inclusion in future updates to the air quality plans for the SDAB. At the time of preparation of the Complete Communities FEIR, the most recent SIP and RAQs were updated in 2016, with new updates occurring on a three-year cycle. Therefore, densities with community plans adopted after 2016 would be reflected in the current air quality plans. Additional density allowed with communities without a recent comprehensive community plan update would also not be reflected in the air quality plans. Thus, the implementation of the Complete Communities Program could result in a significant impact due to conflicts with the land use assumptions used to develop current RAQs and SIP. Impacts are identified in the FEIR as significant and unavoidable.

Future construction activities associated with development under the Complete Communities Program are anticipated to occur sporadically over approximately 30 years, consistent with build-out assumption in recent community plan updates. Build-out would be comprised of multiple projects undertaken by individual developers/project applicants, each having project-specific construction timelines and activities. Construction activities associated with the CCHS Regulations would also occur sporadically over time, including both transportation infrastructure improvements and development incentivized by the CCHS Regulations. As the exact number and timing of individual development projects and infrastructure improvements that could occur as a result of implementation of specific proposed projects are unknown at this time, it is possible that multiple projects could be constructed simultaneously and future development could exceed emissions thresholds. Therefore, construction-related air quality impacts resulting from the Complete Communities Program and specifically the CCHS Regulations are identified in the FEIR as significant.

Operational emissions are long-term and include mobile and area sources. The CCMC Program would not be directly associated with operational emissions as the program would result in the installation of transportation infrastructure and amenities that would facilitate active transportation modes and are anticipated to support a decrease in vehicular mode share. For purposes of analyzing potential operational emissions, the Complete Communities FEIR assumed that development under the CCHS could exceed emissions levels compared to existing plans, as the CCHS could increase multifamily residential densities within the CCHS project areas. While the CCMC Program would incentivize development, it would not authorize any increase in residential densities beyond existing allowances.

The primary source of operational emissions resulting from residential development is vehicle emissions. While the CCHS Regulations could increase multifamily residential densities within Complete Communities Program project areas, the redistribution of density to focus within TPAs would provide a more efficient land use pattern that would support a reduction in VMT and

associated operational air emissions. Additionally, high density residential development generally would result in less area source emissions associated with fireplaces and landscape equipment.

The Complete Communities Program spans multiple community planning areas, including areas without recently adopted community plans. As the Complete Communities Program could increase operational emissions within communities without recently adopted community plan updates and redistribute density within communities with recently adopted community plan updates, it is possible that operational air emissions could be in excess of what was evaluated in the community plan EIRs completed for all of the project areas. Thus, at the programmatic level of review conducted for the Complete Communities FEIR and without project-specific development plans, operational emissions impacts resulting from development under the Complete Communities Program were determined to be significant and unavoidable.

Recent community plan update EIRs have included analysis of intersection volumes to determine the potential for a carbon monoxide (CO) hot spot occurrence with build-out of the proposed community plan updates. As the CCHS would allow for increased height and square footage, and thus increased density, within TPAs for multifamily residential projects that meet all of the requirements of the ordinance, these projects could increase intersection volumes beyond what was evaluated in recent community plan updates. While it is not reasonably foreseeable that the potential increase in intersection volumes could exceed the 31,600 vehicle-screening threshold based on the fact that projected volumes from the recent community plan update EIRs have not exceeded the threshold, other communities, including communities within the project areas without a recent community plan update, could have intersections with volumes approaching the screening threshold. As the CCHS would allow for ministerial approval of multifamily residential developments, future projects would not be required to perform dispersion modeling to determine the potential for CO hot spots. It is possible that increased congestion within TPAs resulting from development under the CCHS of the Complete Communities Program could increase volumes and delays at intersections, and could experience 31,600 vehicles per hour or more, resulting in a potentially significant impact related to localized CO hot spots.

Improvements under the CCMC Regulations would not generate increased volumes at intersections; however, over time, mobility improvements favoring non-vehicular transportation could result in additional vehicular delay; housing incentivized by the CCHS Regulations would contribute to trips to local roadways. The CCMC Regulations would result in the installation of transportation infrastructure and amenities that are anticipated to support a decrease in vehicular mode share.

However, at the program-level of analysis conducted for the Complete Communities FEIR, it could not be determined how the CCMC Program would affect vehicular mode share or roadway/intersection operations. Therefore, localized CO emissions associated with the CCMC Regulations are identified in the FEIR as potentially significant.

Relative to toxic air emissions, construction of future projects and associated infrastructure implemented under the Complete Communities Program would result in short-term diesel exhaust emissions from the use of on- and off-site heavy- duty equipment. Construction would result in the generation of diesel particulate matter (DPM) emissions from the use of off-road diesel equipment required for site grading and excavation, paving, and other construction activities as well as on-road diesel equipment used to bring materials to and from project sites. Based on the highly dispersive

nature of DPM, required compliance with SDAPCD air quality rules, and the fact that construction activities would occur intermittently and at various locations throughout the Complete Communities' project areas, DPM generated by construction is not expected to create conditions where the probability is greater than 10 in one million of developing cancer for the Maximally Exposed Individual or to generate ground-level concentrations of non-carcinogenic toxic air contaminants that exceed a Hazard Index greater than one for the Maximally Exposed Individual. Additionally, with ongoing implementation of Environmental Protection Agency (EPA) and California Air Resources Board (CARB) requirements for cleaner fuels, off-road diesel engine retrofits, and new low-emission diesel engine types, the DPM emissions of individual equipment would be substantially reduced over the years as build-out continues. Therefore, impacts related to exposure of sensitive receptors to construction toxic air emissions were determined to be less than significant with the implementation of the Complete Communities Program.

Relative to stationary sources that emit toxic air emissions, such as gasoline stations, power plants, dry cleaners, and other commercial and industrial uses, the Complete Communities Program would facilitate the development of high density multifamily development with neighborhood-serving infrastructure within TPAs and the development of active transportation infrastructure within TPAs and Mobility Zones 1, 2, and 3, and would not facilitate land uses that would serve as a source of stationary air emissions. Therefore, the Complete Communities Program would not result in toxic air emissions that could result in public health risks. Impacts related to the exposure of sensitive receptors to stationary source toxic air emissions would be less than significant.

Consistent with recent community plan update EIRs analyses related to mobility source emissions, the Complete Communities Program would require future projects within 500 feet of a freeway to provide land use buffers, such as providing off-street parking and landscaping between freeways and the proposed use and orienting usable open space areas and balconies away from the freeway. Improvements would result in the installation of transportation infrastructure and amenities that are anticipated to support a decrease in vehicular mode share. Consistent with the goals of CARB's handbook, Complete Communities Program requirements and design guidelines support infill, high-density multifamily residential development and transit-oriented development that would benefit regional air quality. Given the lack of project-specific information associated with Complete Communities, impacts related to the goals of CARB and exposure of sensitive receptors to substantial pollutant concentrations could not be determined. Therefore, impacts related to the exposure of sensitive receptors to mobile source emissions were identified as significant and unavoidable.

Facilities that generate objectionable odors typically include wastewater treatment plants, landfills, and paint/coating operations (e.g., auto body shops), among others. The ordinances of the Complete Communities Program would facilitate the development of high-density multifamily residential development with associated infrastructure improvements within TPAs (for the CCHS Regulations), and Mobility Zones 1, 2, and 3 (for the CCMC Regulations) would support the development of active transportation infrastructure within these areas. These uses are not expected to result in objectionable odors. Impacts would be less than significant.

Project

The project would implement the mixed-use development anticipated in the North Park CPU land use plan. The North Park CPU PEIR identifies greater operational air quality emissions than those identified under the adopted Community Plan due to the increase in residential uses when compared to the previously adopted Community Plan. Thus, the project would contribute to the significant and unavoidable impact associated with the RAQS identified in the North Park CPU PEIR; however, Mitigation Measure AQ 6.4-1 would not be required by the project, as it requires the City to submit a revised land use plan to SANDAG for updating growth projections.

Implementation of the project would produce temporary air emissions during construction as a result of demolition, soil grading, heavy equipment operations, worker trips, deliveries/material hauling trips, and temporary power production. The Complete Communities FEIR analyzed hypothetical construction scenarios, including a 5-acre mixed-use development consisting of the demolition of an existing 20,000 SF structure and the construction of 300 multifamily residential units and 10,000 SF of retail uses. The resultant air emissions modeling showed that criteria pollutants, including ROG, NOx, CO, sulfur dioxides (SO_2), and particulate matter, were all well below established significance thresholds, and for each pollutant, were less than 30 percent of the threshold. Because the project is smaller in size, and less of multifamily units and commercial square footage than analyzed in the Complete Communities FEIR hypothetical project, project construction would not be expected to exceed applicable thresholds for criteria pollutants. Impacts would be less than significant. The project would not be required to implement North Park CPU PEIR Mitigation Measure AQ 6.4-2.

Sources of operational emissions associated with the project include traffic generated by the project, and area source emissions from the use of natural gas, fireplaces, and consumer products. Emissions modeling was conducted for the PEIR and determined that build-out of the entire CPU area would exceed the City's project-level thresholds and would be greater than levels anticipated in the prior community plan. Thus, the project would contribute to the significant and unavoidable air quality impact associated with the operational emissions identified in the North Park CPU PEIR and Complete Communities FEIR. The project would comply with the Complete Communities program and the CCHS Regulations, which would minimize the project's contributions to air emissions via compliance with CAL Green code and required transportation improvements that would reduce the project's VMT as outlined under the Transportation analysis above. Specifically, the proposed VMT reduction measures include an on-site bicycle repair station, an on-site multi-modal information kiosk located within the residential lobby entry, and short-term bicycle parking spaces that are available to the public.

The project site is located approximately 0.4 miles from the nearest intersection in the North Park CPU area that was evaluated for potential CO hotspots. The analysis determined that none of the intersections identified in the North Park CPU FEIR would result in significant impacts associated with CO hotspots. Thus, the project would not result in impacts associated with sensitive receptors and CO hotspots. The incremental increase in cancer risks and chronic health risks to sensitive receivers associated with build-out of the proposed North Park CPU and associated discretionary actions are identified in the North Park CPU PEIR as less than significant. As the proposed project is

consistent with the North Park CPU, impacts to sensitive receptors associated with the project would also be less than significant, and no mitigation is required.

Construction of the project at the site would involve the use of diesel-powered construction equipment. Diesel exhaust odors may be noticeable temporarily at adjacent properties during the construction period; however, construction activities would be temporary and are not considered significant. The proposed development of the site would not include industrial or agricultural uses that are typically associated with objectionable odors. Therefore, impacts associated with objectionable odors would be less than significant, and no mitigation is required.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the conclusions identified in the North Park CPU PEIR or the Complete Communities FEIR. The project would not result in any new significant impacts, nor a substantial increase in the severity of impacts from those described in the North Park CPU PEIR or the Complete Communities FEIR.

Greenhouse Gas Emissions

North Park CPU PEIR

The North Park CPU and associated discretionary actions would increase GHG emissions over those of the adopted Community Plan; however, this increase in GHG is a direct result of the implementation of Climate Action Plan (CAP) Strategies and the General Plan's City of Villages Strategy. Increasing residential and commercial density in transit corridors and Community Villages within a TPA would support the City in achieving the GHG emissions reduction targets of the CAP, and thus, the North Park CPU PEIR identifies less than significant impacts associated with GHG emissions.

The North Park CPU and associated discretionary actions would implement the General Plan's City of Villages Strategy and include policies for the promotion of walkability and bicycle use, polices promoting transit-supportive development, and would be consistent with the CAP and the General Plan. Impacts associated with conflicts with applicable plans, policies, or regulations adopted for the purposes of reducing GHGs are identified in the North Park CPU PEIR as less than significant.

Complete Communities FEIR

The Complete Communities FEIR concluded that the Complete Communities Program would be consistent with the General Plan's City of Villages strategy and the City's CAP by incentivizing the development of multifamily residential as well as other land uses to support increased multifamily residential densities within TPAs and Mobility Zones 1, 2, and 3. The Complete Communities Program will reduce GHG emissions, primarily through reductions in VMT. Thus, the Complete Communities Program would support the City in obtaining citywide GHG emissions reduction targets under the CAP. Impacts related to GHG emissions would be less than significant.

The Complete Communities FEIR determined that future development under the Complete Communities Program would be consistent with State plans, SANDAG's Regional Plan, the City's General Plan, and the City's CAP. Future housing development implemented under the Complete Communities Program would require compliance with the California Building Code (CBC) energy

efficiency and applicable CAL Green building standards and therefore would be compliant with State plans. The Complete Communities Program would require provision of infrastructure amenities such as bicycle lanes, transit amenities, or public open spaces and would implement SANDAG's Regional Plan goals and land use strategies. Regarding compliance with the City's General Plan, by allowing qualifying multifamily housing to proceed with a ministerial approval process under the Complete Communities Program and allowing for increased height and square footage for projects processed under the proposed ordinances, the Complete Communities Program would support and incentivize future development envisioned by the City of Villages strategy. Based upon this analysis, impacts associated with applicable GHG emission reduction plans were determined to be less than significant.

Project

The project is consistent with the existing General Plan and North Park Community Plan land use designations and zoning on the site with implementation of the CCHS Program. As a mixed-use development with multifamily residential housing within a TPA and in Mobility Zone 2, the project would comply with the City of Villages strategy and policies for the promotion of walkability and bicycle use and polices promoting transit-supportive development as envisioned in the North Park CPU and CCHS Program; thus, reducing its GHG emissions by implementing VMT reductions as part of the project design. The proposed VMT reduction measures include an on-site bicycle repair station, an on-site multi-modal information kiosk located within the residential lobby entry, and short-term bicycle parking spaces that are available to the public. As the project would be required to implement CCHS Regulations, it would minimize the project's contributions to GHG emissions via the required design features and transportation improvements. The project would also be consistent with the strategies and actions of the CAP to reduce citywide GHG by incorporating energy and water efficient building features, electric vehicle charging, bicycle parking, and street tree plantings. These project features would be assured as conditions of project approval. Thus, the project is consistent with the GHG reduction strategies in the CAP. No mitigation is required.

The project's contribution of GHGs to cumulative Statewide emissions would be less than cumulatively considerable based on the project's consistency with the City's CAP and the General Plan. Therefore, the project's GHG emissions would have a less than significant impact on the environment. No mitigation is required.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the conclusions identified in the North Park CPU PEIR or the Complete Communities FEIR. The project would not result in any new significant impacts, nor a substantial increase in the severity of impacts from those described in the North Park CPU PEIR or the Complete Communities FEIR.

Noise

North Park CPU PEIR

The North Park CPU PEIR identifies a significant and unavoidable impact associated with increases in ambient noise levels. An increase in ambient vehicular traffic noise in the North Park CPU area would result from continued build-out of the North Park CPU and increases in traffic due to regional

growth. A significant increase would occur adjacent to several street segments in the North Park CPU area, which could result in the exposure of existing noise sensitive land uses to noise levels in excess of the compatibility levels established in the General Plan, resulting in a significant impact. For new discretionary development, there is an existing regulatory framework in place that would ensure future projects implemented in accordance with the proposed North Park CPU and associated discretionary actions would not be exposed to ambient noise levels in excess of the compatibility levels in the General Plan. Thus, noise impacts associated with new discretionary projects would be less than significant. However, in the case of ministerial projects, there is no procedure to ensure that exterior noise is adequately attenuated. Therefore, exterior noise impacts for ministerial projects located in areas that exceed the applicable land use and noise compatibility level would be significant and unavoidable. No feasible mitigation has been identified at the program level to reduce impacts to less than significant.

In the North Park CPU area, noise levels for all land uses would be incompatible (i.e., greater than 75 dB(A) CNEL) closest to the freeways. The North Park CPU PEIR indicates that these areas are developed, and the proposed North Park CPU and associated discretionary actions would not change the land use in these areas. Thus, while land uses in these areas would be exposed to noise levels that exceed General Plan standards, this noise exposure would not be a significant noise impact resulting from implementation of the proposed North Park CPU and associated discretionary actions. No mitigation is required at the program level.

A regulatory framework and review process exists for new discretionary development in areas exposed to high levels of vehicle traffic noise. Individual projects would be required to demonstrate that exterior and interior noise levels would be compatible with City standards. Noise compatibility impacts associated with the proposed North Park CPU and associated discretionary actions would be less than significant with the implementation of existing regulations and noise standards. However, in the case of ministerial projects, there is no procedure to ensure that exterior noise is adequately attenuated. Therefore, exterior noise impacts for ministerial projects located in areas that exceed the applicable land use and noise compatibility level is identified in the North Park CPU PEIR as significant and unavoidable.

Regarding compatibility with aircraft noise levels, the SDIA is located approximately 2 miles west of the North Park planning area and is entirely outside of the 60 dB(A) CNEL noise contour identified in the Airport Land Use Compatibility Plan. Thus, no impact would occur related to aircraft noise is identified in the North Park CPU FEIR.

Mixed-use sites and areas where residential uses are located in proximity to commercial sites would expose sensitive receptors to noise, which would be controlled by City policies and regulations to reduce noise impacts between various land uses. In addition, enforcement of federal, state, and local noise regulations would control impacts. With implementation of these policies and enforcement of the Noise Abatement and Control Ordinance of the Municipal Code, impacts associated with noise ordinance compliance are identified in the North Park CPU PEIR as less than significant and no mitigation is required at the program level.

Construction activities related to implementation of the proposed North Park CPU and associated discretionary actions would potentially generate short-term noise levels in excess of 75 dB(A) L_{eq} at adjacent properties. While the City regulates noise associated with construction equipment and

activities through enforcement of noise ordinance standards (e.g., days of the week and hours of operation) and imposition of conditions of approval for building or grading permits, there is a procedure in place that allows for a permit to deviate from the noise ordinance. Due to the highly developed nature of the North Park CPU area with sensitive receivers potentially located in proximity to construction sites, there is a potential for future projects to expose existing sensitive land use to significant noise levels. While future development projects will be required to incorporate feasible mitigation measures, due to the close proximity of sensitive receivers to potential construction sites, the program-level impact related to construction noise is identified in the North Park CPU PEIR as potentially significant. Mitigation Framework NOISE 6.6-1 is identified in the PEIR to reduce impacts to a less than significant level.

The North Park CPU PEIR identifies significant and unavoidable noise impacts associated with vibration during construction. By use of administrative controls, such as scheduling construction activities with the highest potential to produce perceptible vibration to hours with least potential to affect nearby properties, perceptible vibration can be kept to a minimum and as such would result in a less than significant impact with respect to perception. However, pile driving within 95 feet of existing structures has the potential to exceed 0.20 inch per second and is identified in the North Park CPU PEIR as potentially significant. Mitigation Framework Noise 6.6-2 is identified to reduce construction-related vibration impacts; however, at the program-level it cannot be known whether the measures would be adequate to minimize vibration levels to less than significant. Thus, even with implementation of NOISE 6.6-2, the North Park CPU PEIR identifies construction-related vibration impacts as significant and unavoidable.

Complete Communities FEIR

The Complete Communities FEIR determined that ambient noise levels in the project areas would increase as a result of implementation of the Complete Communities Program. The increase in ambient noise levels associated with additional potential density within the project areas could expose existing and future noise-sensitive receptors to a significant noise impact. The CCHS Regulations include design requirements to attenuate noise levels in outdoor usable open space areas through project design. While compliance with design requirements would reduce potential impacts to existing and future noise sensitive land uses, future ambient noise levels could nevertheless exceed the City's significance threshold. Therefore, impacts would be significant and avoidable.

The Complete Communities FEIR found that with implementation of the Complete Communities Program, interior noise standards of 45 dBA CNEL for residential uses and 50 dBA for nonresidential uses would be achieved through compliance with Title 24 requirements during the building permit review. However, future development within the project areas where Complete Communities can be applied could result in the exposure of residents to exterior noise levels that exceed the City's significance thresholds. Recent community plan update EIR analysis shows noise levels in the project areas are dominated by vehicle traffic exceeding allowable levels. While design requirements associated with the Complete Communities Program would reduce potential impacts to existing and future noise sensitive land uses, future ambient noise levels could nevertheless exceed the City's significance threshold. Therefore, impacts would be significant and unavoidable.

Areas where Complete Communities can be applied are located within AIAs of the following five airports: Brown Field, Montgomery Field, Marine Corps Air Station Miramar, NOLF Imperial Beach, and SDIA. Each applicable ALUCP identifies noise contours within which land uses may be exposed to airport noise. Approximately 762 acres within the Complete Communities' project areas are located within a 65 to 70 CNEL ALUCP noise contour, approximately 495 acres are located within a 70 to 75 CNEL ALUCP noise contour, and approximately 138 acres are located within a 75 CNEL ALUCP noise contour or higher. However, the Complete Communities Program does not propose a change to any existing land use designation; future multifamily residential development allowed under the proposed ordinance would be consistent with existing Community Plan allowed land uses and associated ALUC consistency determinations. Any future development within the project areas would be subject to applicable overflight notification policies in the respective ALUCP that would be enforced during the building permit phase. Therefore, impacts would be less than significant.

The Complete Communities FEIR concluded that the Complete Communities Program project areas would contain mixed-use areas where residential uses are located in proximity to commercial sites, which could expose sensitive receptors to noise above allowable levels. It is not anticipated that stationary sources associated with multifamily residential land uses located within TPAs would result in noise exceeding property line limits; however, at the programmatic level of review that was conducted for the FEIR, location of stationary sources and impacts to sensitive receptors could not be verified. The City's Noise Ordinance property line standards would apply to any future development processed under the proposed ordinance. Although enforcement mechanisms for the violation of noise regulations in the Noise Abatement and Control Ordinance would provide for the correction of potential noise exceedances, the Complete Communities FEIR determined that impacts would remain potentially significant and unavoidable.

The Complete Communities FEIR found that construction activities related to implementation of the Complete Communities Program would potentially generate short-term noise levels in excess of 75 dBA L_{eq} at adjacent properties. While the City regulates noise associated with construction equipment and activities through enforcement of its Noise Abatement and Control Ordinance, impacts associated with construction noise would remain potentially significant and unavoidable.

Project

Sources of ambient noise in the project area consist of vehicle traffic and stationary noise associated with nearby commercial and residential uses. Vehicular traffic along University Avenue and 30th Street are the dominant sources affecting ambient noise levels in the project vicinity. The project is consistent with the uses envisioned for the property in the North Park CPU, and thus, is included in the ambient noise projections contained in the PEIR. According to Table 6.6-2 of the North Park CPU PEIR, increases in ambient noise along 30th Street between Lincoln Avenue and University Avenue are projected to increase 0.7 dBA from 66.4 dBA to 65.1 by 2035. Noise levels along University Avenue between Utah Street and 30th Street are projected to increase by 0.8 dBA from 66.2 dBA to 67 dBA by 2035. Changes in ambient noise levels of 3 dB or greater are perceptible to the human ear. The projected 0.7 to 0.8 dB increase in ambient noise predicted in the project vicinity would not be perceptible and would not result in significant noise exposure to existing and future noise-sensitive land uses (NSLUs). Therefore, the project would not expose NSLUs to ambient noise that exceeds the City's noise standards, and impacts would be less than significant.

The project site is not located within areas identified by the North Park CPU PEIR as having incompatible noise levels (i.e., greater than 75 dB(A) CNEL). The two closest sources of vehicle noise to the project site are 30th Street and University Avenue. According to Table 6.6-3 of the North Park CPU PEIR, future vehicle traffic contour distances along 30th street between Lincoln Avenue and University Avenue, would be 75 CNEL at 5 feet from the roadway centerline, 70 CNEL at 16 feet, 65 CNEL at 51 feet, and 60 CNEL at 162 feet. Along University Avenue, between Utah Street and 30th Street, vehicular noise would be 75 CNEL at 8 feet from the roadway centerline, 70 CNEL at 25 feet, 65 CNEL at 79 feet, and 60 CNEL at 251 feet. The project site is over 200 feet from the centerline of 30th Street and approximately 30 feet from the centerline of University Avenue. Based on these distances from the roadway centerlines, the proposed building exterior would be exposed to noise levels between 65 and 70 CNEL due to future vehicular traffic noise in the project area. Therefore, the project would be a compatible use with the future noise environment described in the PEIR.

As stated above, the project's traffic would contribute to these future noise levels but would not be a significant source of vehicular noise due to the low volume of traffic it would produce (i.e., 1,189 net new ADT; LLG 2025a) relative to the existing and future traffic volumes anticipated in the Community Plan area. The existing regulatory framework and review process for new development in areas exposed to high levels of vehicle traffic noise, in combination with compliance with policies in the North Park CPU and General Plan, would ensure that the project would not be exposed to incompatible exterior noise levels. Impacts would be less than significant.

The project site is not located within the SDIA noise contours, as identified in the SDIA ALCUP (San Diego County Regional Airport Authority Airport Land Use Commission 2014; Exhibit 2-1). As such, the project site would not be exposed to airport-associated noise in excess of 60 dB CNEL.

The project features residential and commercial uses that would produce new stationary noise sources, such as heating/ventilation/air conditioning (HVAC) units in the project area. City policies and regulations would control these noise sources and reduce potential impacts between the project and the nearby land uses. The project would comply with the existing regulatory framework and the City's development review process, which would ensure compliance with applicable noise standards and protect NSLUs in the project area from noise in excess of the required standards.

Construction associated with the project would include partial demolition of the existing structures, asphalt, and concrete; site preparation work; excavation of subgrade parking; foundation work; and building construction. These activities would generate temporary construction noise. As discussed in the North Park CPU PEIR, construction equipment would generate maximum noise levels between 85 to 90 dB at 50 feet from the source when in operation. Hourly average noise levels would be 82 dB(A) at 50 feet from the center of construction activity when assessing the loudest pieces of equipment working simultaneously. Noise levels would vary depending on the nature of the construction including the duration of specific activities, nature of the equipment involved, location of the particular receiver, and nature of intervening barriers. Construction noise levels of 82 dB(A) L_{eq} at 50 feet would attenuate to 75 dB(A) L_{eq} at 110 feet. Therefore, based on this analysis of typical construction noise levels, significant impacts would occur if noise sensitive land uses are located closer than 110 feet from construction activities. The nearest sensitive receptor to the project site would be the residential uses located directly adjacent to the northern boundary of the project site. Construction noise impacts for the project would be potentially significant, consistent with the

construction noise impacts identified for the North Park CPU PEIR. The project would implement North Park CPU PEIR Mitigation Measure NOISE 6.6-1, as outlined in MM-NOI-1 in the Mitigation, Monitoring and Report Program (MMRP) in Section VII of this Addendum, to reduce construction noise impacts to a less than significant level.

Construction activities associated with the project would have the potential to generate construction vibration, particularly associated with demolition and excavation. The project would not require pile driving to construct the proposed structure; therefore, impacts from construction vibration would be less than significant. In addition, the proposed mixed-use project does not include components that would generate vibration during long-term operation. Impacts associated with vibration would be less than significant. The project would not be required to implement North Park CPU PEIR Mitigation Measure 4.6-2.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the conclusions identified in the North Park CPU PEIR or the Complete Communities FEIR. The project would not result in any new significant impacts, nor a substantial increase in the severity of impacts from those described in the North Park CPU PEIR or the Complete Communities FEIR.

Historical Resources

North Park CPU PEIR

Implementation of the North Park CPU and associated discretionary actions could result in an alteration of a historic building, structure, object, or site. Mitigation Measure HIST 6.7-1 is identified in the PEIR, which requires an evaluation of historic architectural resources prior to the issuance of any permit for a development project and requires mitigation to be implemented based on impacts identified during project-specific evaluation. However, even with implementation of the mitigation framework identified in the North Park CPU PEIR, the degree of future impacts and applicability, feasibility, and success of future mitigation measures cannot be adequately known for each specific future project at the program level of analysis; thus, the North Park CPU PEIR identifies significant and unavoidable impacts to historic buildings, structures, and objects.

Development implemented in accordance with the North Park CPU and associated discretionary actions would potentially result in impacts to significant archaeological and tribal cultural resources and would be required to implement mitigation measure HIST 6.7-2, which addresses measures to minimize impacts to archaeological and tribal cultural resources. Mitigation, combined with the policies of the General Plan and North Park CPU, in addition to compliance with CEQA and Public Resources Code Section 21080.3.1 requiring tribal consultation, and the City's Historic Resources Regulations (SDMC Section 143.0212) which requires review of ministerial and discretionary permit applications for any parcel identified as sensitive on the Historical Resources Sensitivity Maps would reduce the program-level impact related to prehistoric or historical archaeological resources and tribal cultural resources. However, even with the application of the existing regulatory framework and mitigation framework, the feasibility and efficacy of mitigation measures cannot be determined at the program level of analysis. Thus, impacts to prehistoric resources, sacred sites, and human remains would be minimized, but not to below a level of significance. Impacts to archaeological and tribal cultural resources are identified in the North Park CPU PEIR as significant and unavoidable.

Complete Communities FEIR

The Complete Communities FEIR anticipated that development under the proposed ordinances may result in the demolition or alteration of a structure older than 45 years old. Development on parcels containing individually significant historical resources would need to comply with the U.S. Secretary of the Interior's Standards for the Treatment of Historic Properties (SOI Standards) or obtain a Site Development Permit with deviation findings and site-specific mitigation would be required. The Complete Communities FEIR determined the project could result in direct impacts, including the substantial alteration, relocation, or demolition of historic buildings or structures. Impacts were determined to be significant and unavoidable.

The Complete Communities FEIR acknowledges that while existing regulations and the LDC would provide for the regulation and protection of archaeological resources and human remains, it is impossible to ensure the successful preservation of all archaeological resources. Therefore, potential impacts to archaeological resources and human remains are considered significant and unavoidable.

Project

The project site contains a locally designated historic resource, the Edward and Emma Newman Building. The Edward and Emma Newman Building is listed on the City's Register of Historical Resources (HRB #1482). The project would substantially alter the Edward and Emma Newman Building by removing the north facade and roof as well as adding new construction above. The south and west façades on University Avenue and Kansas Street will be retained and rehabilitated to mitigate impacts to the historic building. The project also includes demolition of the structure at 2920 University Avenue, which was evaluated and determined to not be historically significant.

The Historical Resources Technical Report (HRTR) prepared for the project (Heritage Architecture & Planning 2025; Appendix C) has identified the Edward and Emma Newman, located at 2906-2912 University Avenue, as significant at the local level under local Criterion A and C (refer to discussion below for additional details), and eligible for listing on the National Register under Criterion A and California Register Criterion 1 for its association with the early commercial developments that have made significant contributions to the broad patterns of North Park community and San Diego's historical and economic heritage. The building is also identified as significant at the local level under Criterion A, as being representative of the early commercial development of North Park that occurred along University Avenue as a result of the streetcar line expansion and subsequent residential growth. The commercial center at 30th and University developed into the community's primary commercial core, and the Edward and Emma Newman Building housed the community's first department store, the Mudd Department store, from 1929 to 1932. The building retains historic integrity as it relates to this significance.

The building is also identified as significant at the local level and eligible for listing in the National Register under Criterion C, the California Register Criterion 3, and the San Diego Register Criterion C for its Spanish Colonial Revival architectural style and One-Part Commercial Block building type. Specifically, the resource encompasses the entire parcel, retains a boxed form, features a large expanse of wall above the storefront intended for signage and large glass display windows to illustrate its use as a commercial space. Additionally, the building continues to convey the historic

significance of the Spanish Colonial style by embodying the historic characteristics associated with the style including an undulating stucco exterior, pilasters with scroll-like capitals, Mission tile roof, decorative wrought iron, corner tower, arched transom windows, accent tiles, and clay attic vents. The building retains historic integrity as it relates to this significance.

The Edward and Emma Newman Building was designated as a historical resource (resource) on the San Diego Register on January 26, 2023 under HRB Criterion A and C, as described above. The City's Historical Resources Regulations requires that all designated historical resources be maintained consistent with the Secretary of the Interior's Standards (Standards) or a deviation is required through a Site Development Permit (SDMC Section 143.0220). The current project is not consistent with the Standards and requires a deviation from the City's Historical Resources Regulations. The proposed removal of the building's existing roof and north façade is not consistent with the Standards due to the removal of a substantial amount of historic material. Additionally, the construction of the six stories above the resource is not consistent with the Standards due to the proposed massing, size, scale and proportion of the new construction in relation to the resource. Therefore, the proposed development is, by definition, a substantial alteration requiring a Site Development Permit (SDP), consistent with SDMC Section 143.0251.

The project has complied with North Park CPU PEIR Mitigation Measure HIST 6.7-1, which requires an evaluation of historic architectural resources. The HRTR evaluation identified project-specific significant impacts, requiring the need for project-specific mitigation. Implementation of project-specific mitigation, identified as MM-HIST-1, MM-HIST-2, MM-HIST-3, and MM-HIST-4 in the MMRP in Section VII of this Addendum, would be required for the exterior façade rehabilitation. The Edward and Emma Newman Building would be documented to Historic American Building Survey (HABS) standards prior to the north exterior wall and roof demolition (MM-HIST-1). Additionally, a Treatment Plan would be prepared and approved by Heritage Preservation staff (HRB; MM-HIST-2). The Treatment Plan would outline how the existing historical facades will be protected during construction and modified in order to accommodate the new development while maintaining the building's historic integrity. The Treatment Plan will also require certain elements of the facade to be restored to the building's historic period of significance. A Monitoring Plan (MM-HIST-3) would be prepared prior to the issuance of any construction permits and would be implemented during construction activities (including demolition work). An existing marker detailing the building's historical significance is present in front of the existing entrance to the building. Project construction could impact the existing marker; however, MM-HIST-4 requires restoration, preservation, and long-term maintenance of the existing sidewalk marker. Therefore, with implementation of mitigation, the direct impact associated with the alteration or repair of a historic structure would be mitigated to the extent feasible. The direct impact associated with the demolition and grading activities would remain a significant, unavoidable impact since it would constitute a loss of a significant portion of the resource's historic materials. This significant and unavoidable project-level impact is consistent with the analyses and conclusions reached at a program-level in the North Park CPU PEIR and the Complete Communities FEIR regarding historic structures.

Most of the North Park community, including the project site and surrounding areas, is developed and is designated for low cultural sensitivity (Figure 6.7-3 of the North Park CPU PEIR). Based on the low cultural sensitivity in the project area and the previous disturbance of the project site, no impacts to prehistoric resources, sacred sites, and human remains are expected. Impacts would be

less than significant, and the project would not be required to implement North Park CPU PEIR Mitigation Measure HIST 6.7-2.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the conclusions identified in the North Park CPU PEIR or the Complete Communities FEIR. The project would not result in any new significant impacts, nor a substantial increase in the severity of impacts from those described in the North Park CPU PEIR or the Complete Communities FEIR.

Biological Resources

North Park CPU PEIR

All impacts associated with biological resources are identified as less than significant in the North Park CPU PEIR. According to the PEIR, implementation of the North Park CPU and associated discretionary actions would primarily affect developed areas within the CPU and would be subject to the City's ESL regulations. Thus, impacts to sensitive species and sensitive habitat are identified as less than significant. The North Park CPU PEIR indicates that no wetland habitat is present within the CPU area, and no impacts to wetlands would occur. No impact to wildlife corridors would occur, and compliance with the Migratory Bird Treaty Act (MBTA) would ensure impacts to wildlife nursery sites remain less than significant. Additionally, the North Park CPU PEIR identifies no conflicts with the City's MSCP, resulting in a less than significant impact.

Complete Communities FEIR

The CCHS Regulations of the Complete Communities Program are intended to facilitate and streamline multifamily development within the project areas by allowing such development to occur ministerially, subject to the requirements of the proposed ordinance and other applicable regulatory requirements. While the Complete Communities Program would allow ministerial multifamily development within TPAs and incentivize housing within existing Mobility Zones 1, 2, and 3, some areas where Complete Communities would be applied may support sensitive species. Of the approximately 10,148 acres of sensitive habitats within the Complete Communities Program area, approximately 605 acres (or 6 percent) are located within lands designated as ESL, including lands within the MHPA.

Future ministerial development within where Complete Communities would be applied would be reviewed by City staff as part of the intake process to determine the presence of ESL, which would include sensitive habitats that may support sensitive species (Land Development Manual (LDM), Project Submittal Requirements, Section 1). If the presence of ESL is unclear, City staff would request evidence to confirm the presence or absence of ESL. If ESL is present and would be impacted by the proposed project, the project would no longer be processed ministerially and would be required to obtain a discretionary permit as detailed in SDMC Table 143-01A, *Applicability of ESL Regulations*. This process would ensure that potentially sensitive habitats would be reviewed in accordance with ESL Regulations, the City's Biology Guidelines, the provisions of the MSCP and VPHCP. Development under Complete Communities program on sites with ESL that are processed with an SDP or Neighborhood Development Permit (NDP) could result in significant impacts to sensitive species. Thus, with implementation of existing regulatory protections for biological resources, impacts to sensitive habitats resulting from future ministerial development within the project areas would be

less than significant. However, at the program level of review conducted as part of the Complete Communities FEIR, impacts associated with potential future discretionary development were unknown and therefore impacts were considered to be significant and unavoidable.

The Complete Communities FEIR determined that impacts to wetlands would not likely occur, as areas where this habitat occurs would remain within open space and/or the MHPA. However, like other ESL, should wetland habitat be identified through project intake screening, the project would undergo a discretionary permit process in accordance with City and wildlife agency regulatory requirements. Thus, with implementation of existing regulatory protections for biological resources, impacts to wetlands resulting from future ministerial development within the Complete Communities' project areas would be less than significant. However, where a discretionary review process is required consistent with the ESL Regulations, it cannot be ensured that all impacts can be fully mitigated at the program level of analysis conducted for the Complete Communities FEIR. Therefore, impacts associated with potential future discretionary development are identified in the FEIR as significant and unavoidable.

The Complete Communities FEIR determined that impacts to wildlife corridors and nursery sites would be avoided through compliance with the MSCP and compliance with protections afforded to MHPA and MHPA-adjacent lands. Thus, through adherence to the existing regulatory framework in place, potential impacts to wildlife corridors and nursery sites would be less than significant.

The Complete Communities FEIR determined that project areas located within MHPA and VPHCP preserve lands would be subject to the ESL Regulations, which would ensure no conflicts would occur in relation to the MSCP Subarea Plan or VPHCP. Additionally, development adjacent to MHPA and VPHCP preserve lands would be subject to the Land Use Adjacency Guidelines in MSCP Subarea Plan Section 1.4.3 and Avoidance and Minimization Measures VPHCP Section 5.2.1. Thus, impacts related to conflicts with the MSCP Subarea Plan and VPHCP are identified as less than significant in the Complete Communities FEIR.

Project

The project site is fully developed in an urbanized community. The site does not contain any ESL (sensitive biological resources) and therefore is not subject to the ESL Regulations. The project site is located outside of and not adjacent to the MHPA and would not have impacts on the MHPA. No wildlife corridors, wetlands or vernal pools are mapped within or adjacent to the project site. The project would not result in impacts to sensitive species, sensitive habitat, wetlands, wildlife corridors, wildlife nursery sites, or conflicts with the City's MSCP, MHPA and VPHCP, consistent with the North Park CPU FEIR. No impact on biological resources would occur.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the conclusions identified in the North Park CPU PEIR or the Complete Communities FEIR. The project would not result in any new significant impacts, nor a substantial increase in the severity of impacts from those described in the North Park CPU PEIR or the Complete Communities FEIR.

Geologic Conditions

North Park CPU PEIR

All impacts associated with geological conditions are identified in the North Park CPU PEIR as less than significant. Future development within the North Park CPU would be required to comply with the SDMC and CBC, including a requirement for site-specific geologic investigations to identify potential geologic hazards or concerns that would need to be addressed during grading and/or construction of specific development projects.

Complete Communities FEIR

The Complete Communities FEIR determined that implementation of the Complete Communities Program would not have direct or indirect significant environmental impacts in regard to seismic hazards, because future development would be required to comply with the SDMC and CBC. This regulatory framework includes a requirement for site-specific geotechnical investigations to identify potential geologic hazards or concerns that would need to be addressed during grading and/or construction of a specific development project. Adherence to the SDMC grading regulations and construction requirements and implementation of recommendations contained within required site-specific geotechnical studies would preclude significant impacts related to seismic hazards. Thus, implementation of Complete Communities would result in less than significant impacts on geologic conditions.

The Complete Communities FEIR determined that implementation of the Complete Communities Program would result in less than significant impacts related to erosion and loss of topsoil. SDMC regulations prohibit sediment and pollutants from leaving the worksite and require the property owner to implement and maintain temporary and permanent erosion, sedimentation, and water pollution control measures. Conformance with mandated City grading requirements would ensure that proposed grading and construction operations would avoid significant soil erosion impacts. Thus, impacts were determined to be less than significant.

The Complete Communities FEIR determined that implementation of the Complete Communities Program would not result in impacts from landslides, lateral spreading, subsidence, liquefaction, or collapse. Future development within the project areas would be required to be constructed in accordance with the SDMC and CBC, and would be required to prepare a site-specific geotechnical report and implement any recommendations within the report. Thus, impacts would be less than significant.

The Complete Communities FEIR states that the SDMC requires a geotechnical investigation prior to issuance of a building permit. If expansive soils are found at a particular project site within the project areas, that project site would need to comply with both the CBC and SDMC requirements. Compliance with existing regulations would ensure that impacts associated with expansive soils are reduced to less than significant.

Project

The project site is located within seismically active Southern California, and the area is prone to ground shaking. A project-specific geotechnical study was prepared for the project (Geocon 2023,

Geocon 2024; Appendices D and E, respectively) to address geologic conditions of the site. The Texas Street Fault and the Florida Canyon Fault are mapped approximately 1,500 and 3,500 feet west of the project site, respectively. The potential for ground rupture at the project site is considered low due to the absence of active faults at the project site.

The project site is underlain by Very Old Paralic Deposits, consisting of an upper clay layer called the Normal Heights Mudstone, ranging from 8.5 to 10.5 feet thick across the site. A sandy and conglomerate portion of the Very Old Paralic Deposits lies below the mudstone layer. The project site is located within the City's Geologic Hazard Category 52, which is considered low risk and includes level areas, gently sloping to steep terrain, and favorable geologic structure. Due to the lack of a permanent, near-surface groundwater table and the very dense nature of the underlying Very Old Paralic Deposits, liquefaction potential for the site is considered very low. No evidence of landsliding or slope instability was observed across the relatively flat, developed site. Published geologic mapping indicates landslides are not present on or adjacent to the site. As discussed in the North Park CPU FEIR and Complete Communities FEIR, new projects, such as the proposed project, would be required to comply with the CBC and SDMC. Compliance with the CBC, the SDMC, and the site-specific geotechnical investigation would ensure the project design would reduce potentially significant impacts associated with ground shaking and seismic hazards to a less than significant level.

The project would require the partial removal of existing buildings (preserving the historical façade of one of the buildings), asphalt, and concrete at the project site and the removal of soil for subgrade parking. The project would implement an erosion control plan that conforms to City-mandated grading requirements and standards in the Land Development Manual, which would ensure that proposed grading and construction operations would avoid significant soil erosion impacts. Soil disturbance would be required during construction, and compliance with the project-specific erosion control plan and local and state regulations related to erosion control would ensure there would not be a substantial loss of topsoil or erosion.

The project geotechnical report addendum states that the project would be adequately stable following project completion. Thus, no impacts associated with geological instability would occur.

The mudstone layer within the Very Old Paralic Deposits possesses a medium to very high expansion potential, while the sandy portion of the Very Old Paralic Deposits unit generally possesses a very low to low expansive potential. The mudstone layer on site is not considered suitable to support the project; however, the mudstone may be completely removed during construction, depending on the finish grade elevation of the subterranean garage. The project geotechnical report contains recommendations to be implemented during project design development, grading, and construction. The project would comply with the SDMC, CBC, and site-specific geotechnical investigation recommendations that would reduce impacts on people or structures to an acceptable level of risk associated with expansive soils. Therefore, impacts are less than significant.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the conclusions identified in the North Park CPU PEIR or the Complete Communities FEIR. The project would not result in any new significant impacts, nor a substantial

increase in the severity of impacts from those described in the North Park CPU PEIR or the Complete Communities FEIR.

Paleontological Resources

North Park CPU PEIR

Because of high sensitivity for paleontological resources within the San Diego and Mission Valley Formations, grading into these formations could potentially destroy fossil resources. Therefore, implementation of future discretionary and ministerial projects within the North Park CPU area within these formations has the potential to result in significant impacts to paleontological resources. Mitigation measure PALEO 6.10, which would apply to any discretionary project that proposes subsurface disturbance within a high sensitivity formation, would reduce the significant impacts to a less than significant level; however, since ministerial projects are not subject to a discretionary review process, there would be no mechanism to screen for grading quantities and geologic formation sensitivity and apply appropriate requirements for paleontological monitoring. Thus, impacts related to future ministerial development that would occur with build-out of the North Park CPU and associated discretionary actions. The North Park CPU PEIR identifies significant and unavoidable paleontological impacts for ministerial projects.

Complete Communities FEIR

The Complete Communities FEIR concluded that Implementation of the General Grading Guidelines for Paleontological Resources, as required by the SDMC and applicable to all new development, would require paleontological monitoring in areas underlain by formations where sensitive paleontological resources could occur. This would ensure that potential paleontological resources' impacts resulting from future grading activities would be less than significant.

Project

The project site is underlain by Very Old Paralic Deposits (Geocon 2023a) and has moderate paleontological sensitivity (City 2025). Based on the proposed Preliminary Grading Plan prepared for the project, the project's earthwork would result in 6,254 cubic yards of cut at a maximum depth of 12 feet, and no fill would be required. These grading quantities exceed the threshold of 1,000 cubic yards and 10 feet of excavation for moderate sensitivity ratings. Therefore, the project would be required to implement paleontological mitigation consistent with the North Park CPU PEIR Mitigation Measure PALEO 6.10. Project-specific mitigation is outlined in the MMRP in Section VII of this Addendum. Potential impacts on paleontological resources would be reduced to below a level of significance.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the conclusions identified in the North Park CPU PEIR or the Complete Communities FEIR. The project would not result in any new significant impacts, nor a substantial increase in the severity of impacts from those described in the North Park CPU PEIR or the Complete Communities FEIR.

Hydrology/Water Quality

North Park CPU PEIR

All development is subject to drainage and floodplain regulations in the SDMC and would be required to adhere to the City's Drainage Design Manual and Storm Water Standards Manual. Therefore, with future development, the volume and rate of overall surface runoff within the proposed North Park CPU and associated discretionary actions would either remain the same as the existing condition or would be reduced when compared to the existing condition. The North Park CPU PEIR identifies less than significant impacts associated with flooding due to an increase in impervious surfaces, changes in absorption rates, drainage patterns, or the rate of surface runoff. Less than significant impacts are also identified for pollutant discharge to receiving waters and increase of discharge to an already impaired water body. Further, the North Park CPU PEIR identifies less than significant impacts associated with groundwater supplies, groundwater quality, and groundwater recharge.

Complete Communities FEIR

The Complete Communities FEIR determined all development occurring within the project areas would be subject to the drainage and floodplain regulations in the SDMC and would be required to adhere to the City's Drainage Design Manual, ESL Regulations protecting floodplains, Federal Emergency Management Agency (FEMA) standards, and the City's Storm Water Standards Manual. Thus, impacts related to changes in runoff patterns associated with future development would be less than significant.

Potential riverine flooding impacts would largely be avoided through compliance with ESL Regulations; however, at a program level of analysis, the Complete Communities FEIR indicates that it cannot be ensured that every future project would fully mitigate potential flooding impacts, resulting in a significant and unavoidable impact. Additionally, for project areas protected by the Provisionally Accredited Levy (PAL) in Mission Valley, impacts would be significant and unavoidable.

Impacts associated with flooding due to a seiche or dam inundation are identified in the FEIR as less than significant, due to lack of seiche hazards within the project areas and based on applicable regulatory requirements and protections associated with development downstream of dams. Impacts related to tsunami inundation would be significant and unavoidable due to the potential for increased development densities occurring within areas subject to tsunami inundation. Future development is anticipated to incorporate adequate design measures to protect development areas from potential mudflow and debris that could follow a fire event; however, areas with potential risk of mudflow cannot be determined at this programmatic level of review and impacts would be significant and unavoidable.

The Complete Communities FEIR determined that new development occurring within the project areas would be required to implement Low Impact Development (LID) standards and storm water BMPs into the design of future projects within the project areas to address the potential for transport of pollutants of concern through either retention or filtration, consistent with the requirements of the MS4 Permit for the San Diego region and the City's Storm Water Standards Manual. Implementation of LID design and storm water Best Management Practices (BMPs) would

reduce the amount of pollutants transported from the project areas to receiving waters. Thus, through compliance with the existing regulatory framework addressing protection of water quality, impacts would be less than significant.

The Complete Communities FEIR determined that storm water regulations that encourage infiltration of storm water runoff and protection of water quality would protect the quality of groundwater resources and support infiltration where appropriate. Impacts are identified as less than significant.

Project

Project-specific studies were prepared for the project, including a Preliminary Drainage Letter and a Preliminary Stormwater Quality Management Plan Letter Report (Kettler Leweck 2025a and 2025b, Appendices F and G, respectively). The project site is located in Flood Zone X, which is not a FEMA-designated floodway (FEMA 2023), and is not located within a 100-year flood hazard area or other known flood area. Runoff from the project site drains towards one location, to the University Avenue gutter near the southwest corner of the project site. Runoff from the existing building is discharged to the gutter of Kansas Street to the west, the alley to the east, and the gutter of University Avenue to the south, with all site runoff converging to the southwest corner of the project site (Kettler Leweck 2025a). This runoff is eventually collected by an existing type B curb inlet located west of the project, on the north side of University Avenue, just before the Utah Street intersection. This curb inlet is connected to the existing public storm drain in University Avenue that turns south onto Arnold Avenue. This storm drain runs south on Arnold Avenue until it is discharged into Balboa Park. Runoff eventually gets collected in a storm drain that continues southeast under Harbor Drive, eventually turning south and discharging into the San Diego Bay. Proposed runoff would follow the existing drainage condition. The project proposes a curb outlet at the southwest corner of the site on Kansas Street and would be directed towards the curb inlet in University Avenue and ultimately discharge into the San Diego Bay. The project site drainage has been designed to handle required flows. The project has been reviewed by the City's engineering staff and would be conditioned to follow building construction guidelines to avoid flooding.

The site is located over 7 miles from the Pacific Ocean and is at an elevation of about 360 feet or greater above mean sea level. The potential for the site to be affected by a tsunami is negligible due to the distance from the Pacific Ocean and the site elevation. The site is not located in the vicinity of or downstream from enclosed bodies of water; therefore, the risk of seiches affecting the site is identified as negligible. Flooding hazards associated with tsunamis or seiches would not occur.

The project is a Priority Development Project (PDP) and would incorporate appropriate LID Practices, Site Design BMPs, Source Control BMP's, and Treatment Control BMPs (Kettler Leweck 2025b). The project is subject to hydromodification requirements that would be satisfied using a biofiltration planter that is sized for treatment. Additionally, the project would be required to implement a Stormwater Quality Management Plan (SWQMP) addressing the project's stormwater approach and compliance with the stormwater permit requirements. The project would be conditioned to comply with the City's Storm Water Regulations during and after construction, and appropriate BMPs would be utilized. Implementation of project specific BMPs would preclude violations of any existing water quality standards or discharge requirements.

The project would be serviced by the public water supply using existing private connections with no need for groundwater resources. The project site is fully developed and would continue to be fully developed following completion of the project. While the project would demolish the majority of the existing buildings on site (retaining the historical façade of one of the on-site buildings) and construct new buildings at the site, it would not substantially alter the amount of impervious groundcover or substantially alter the rate of groundwater recharge at the project site. Proper surface and subsurface drainage would be required of the project. The project would not rely on groundwater in the area and would not significantly deplete any groundwater resources.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the conclusions identified in the North Park CPU PEIR or the Complete Communities FEIR. The project would not result in any new significant impacts, nor a substantial increase in the severity of impacts from those described in the North Park CPU PEIR or the Complete Communities FEIR.

Public Services and Facilities

North Park CPU PEIR

The North Park CPU PEIR identified less than significant impacts to police protection, park and recreation, fire/life safety protection, libraries, and schools. Police, fire/life safety protection, and libraries would be subject to separate environmental review at the time design plans for new facilities are available. There is an existing and projected deficit in population-based parks, which is an adverse impact, but not considered a significant impact at the program level. Implementation of the proposed North Park CPU and associated Impacts to schools would be less than significant with the payment of school development fees as outlined in Government Code Section 65995, Education Code Section 53080, and Senate Bill 50.

Complete Communities FEIR

The Complete Communities FEIR found that implementation of the Complete Communities project could result in construction of schools and the addition of fire and police facilities, as well as libraries. Additionally, transportation infrastructure and amenities constructed under the CCMC Regulations could result in environmental impacts. Specific impacts may occur associated with the construction and operation of future facilities. However, because the analysis conducted for the Complete Communities FEIR was at the program level, the location and need for potential future facilities could not be determined. As it could not be ensured all impacts associated with the construction and operation of potential future facilities would be mitigated to less than significant, the Complete Communities FEIR concluded that impacts would be significant and unavoidable.

Project

The project site is in an area served by the Mid-City Neighborhood Division of the San Diego Police Department. The nearest police station to the project site is the Mid-City Division station, located at 4310 Landis Street, approximately 1.7 miles east of the project site. The proposed project would increase demand for police services through the intensification of on-site uses but would implement the planned land use for the property, consistent with the General Plan and CCHS. As discussed in the PEIR, individual projects within the North Park CPU would be subject to applicable Development

Impact Fees (DIF) for public facilities financing in accordance with SDMC Section 142.0640 to offset demands for new police facilities identified in the community.

The project would generate new park users where there is an existing deficiency of population-based parks. The project site is located in proximity to a number of park and recreation facilities, including North Park Mini Park (located less than 0.1 mile south of the project site), North Park Community Park (located approximately 0.3 mile northwest of the project site), and Jefferson Elementary School joint-use area (located approximately 0.2 mile southwest of the project site). Additionally, Balboa Park is located approximately 0.6 mile southwest of the project site, additional pocket parks, joint use areas, and a number of canyon public and private open spaces located east of Balboa Park are present within the North Park area. The proposed development would be consistent with the planned land use and, therefore, population projections and park demands contained within the North Park CPU PEIR. New development would be subject to payment of DIF to offset demands for new parks.

The project site is in an area served by San Diego Fire-Rescue Department, with the nearest station being San Diego Fire Station 14, located approximately 0.4 mile northeast of the project site. Residential population associated with buildout of the project would be consistent with the population projections in the North Park CPU PEIR; therefore, population-based fire service impacts associated with the implementation of the project would be consistent with those analyzed in the PEIR. The project would be subject to payment of DIF to offset demand for new fire protection facilities.

North Park is served by two library facilities: the North Park Branch and the University Heights Libraries. The North Park Branch is located approximately 0.2 mile southeast of the project site, while the University Heights Library is located approximately 0.9 mile northwest of the project site. As discussed in the PEIR, construction of additional library facilities to meet library service requirements of the North Park community is not required. As the project is consistent with the planned land uses of the North Park CPU and was considered in the overall needs analysis, the project would not result in impacts associated with need for library facilities.

The project is consistent with the planned land uses for the project site, the development of which was included in population and growth projections analyzed in the North Park CPU PEIR. Therefore, the number of students generated by the project would be consistent with those envisioned in the PEIR. The project would be required to pay mitigation fees to the applicable school district, consistent with the requirements of Senate Bill 50.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the conclusions identified in the North Park CPU PEIR or the Complete Communities FEIR. The project would not result in any new significant impacts, nor a substantial increase in the severity of impacts from those described in the North Park CPU PEIR or the Complete Communities FEIR.

Public Utilities

North Park CPU PEIR

Impacts on public utilities are identified as less than significant in the North Park CPU PEIR. The North Park CPU PEIR indicates that there is sufficient water supply to serve existing and projected demands of the CPU area, based on a Water Supply Assessment (WSA) prepared for the CPU. The build-out projections for the proposed North Park CPU and associated discretionary actions are consistent with the water demand assumptions included in the regional water resource planning documents of the San Diego County Water Authority and Metropolitan Water District. Future projects would be required to exercise strict adherence to existing storm water regulations and conformance with General Plan and proposed North Park CPU policies. The necessary infrastructure improvements to storm water, wastewater, and water infrastructure would be standard practice for new development to maintain or improve the existing system in adherence to sewer and water regulations and conformance with General Plan and proposed North Park CPU policies.

Regarding solid waste impacts, the PEIR identifies the preparation of Waste Management Plan (WMP) for any discretionary proposed under the North Park CPU that exceeds the threshold of 40,000 SF to ensure waste diversion and recycling efforts during construction and post-construction future land use occupancy and operation. Nondiscretionary projects proposed under the North Park CPU, and discretionary projects that fall below the 60-ton threshold, would be required to comply with applicable SDMC sections addressing construction and demolition (C&D) debris, solid waste and recyclable materials storage, and recyclable materials collection. The North Park CPU PEIR identifies General Plan policies specific to waste management (Policies PF-I.1 through PF-I.5, focusing on waste diversion in PF-I.2), as well as the City's Zero Waste Plan, which targets 75 percent waste diversion by 2020, 90 percent waste diversion by 2035 and 100 percent diversion by 2040. The North Park CPU PEIR states that although compliance with existing ordinances is not sufficient to achieve these targets, and existing recycling infrastructure is not sufficient to accommodate future increases in organics diversion, the development of WMP allows flexibility to require site-specific measures to reduce waste. Thus, the North Park CPU PEIR identifies less than significant impacts associated with solid waste management.

Complete Communities FEIR

The Complete Communities FEIR found that, according to Water Supply Assessments (WSAs) prepared for recent CPUs, water demand would not increase within project areas located in communities with a recent community plan update. Within project areas that do not have recent comprehensive community plan updates, it is possible that densities could be authorized in excess of what would have been considered in the latest water supply planning document. While existing building code regulations would serve to ensure water-efficient fixtures are installed with new development and CAL Green requires 20 percent reduction in indoor water use relative to specified baseline levels, at this programmatic level of review, direct and cumulative impacts related to the availability of water supplies based on existing projections could be significant due to the potential for increased density not considered in water supply planning documents. Impacts would be significant and unavoidable.

The Complete Communities FEIR concluded that mandatory compliance with City standards for the design, construction, and operation of storm water, water distribution, wastewater, and communications systems infrastructure would likely minimize significant environmental impacts associated with the future construction of and/or improvements to utility infrastructure. However, at the programmatic level of review that was conducted for the Complete Communities FEIR and without the benefit of project-specific development plans, both direct and cumulative impacts associated with the construction of stormwater, water distribution, wastewater, and communication systems could be significant. Impacts would be significant and unavoidable.

The Complete Communities FEIR determined that future development within the project areas where Complete Communities could be applied would generate solid waste through demolition/construction and ongoing operations, which would increase the amount of solid waste generated within the region. However, future projects would be required to comply with City regulations regarding solid waste that are intended to divert solid waste from the Miramar Landfill to preserve capacity. Compliance with existing regulations requiring waste diversion would help preserve solid waste capacity. Therefore, impacts associated with solid waste would be less than significant.

Project

Water service is provided to the project site by the City's Public Utilities Department. The project would be serviced by the public water supply using existing private connections. The project would implement a 108,000 SF residential (92 units) and commercial/retail (including 4,900 SF in the 108,000 SF total) building in a mixed-use configuration, consistent with the land use designation applied to the site in the North Park CPU. The structure would not exceed the criteria to be considered a project by the State Water Code and thus does not need a project-specific WSA. As discussed above, the WSA for the North Park CPU determined that there is sufficient water supply to serve existing and projected demands of the North Park community, and future water demands within the PUD's service area in normal and dry year forecasts during a 20-year projection. In addition, the project is not a "project" subject to the WSA requirements defined in Water Code Section 10912. Therefore, the project would not use excessive amounts of water beyond projected available supplies. Impacts would be less than significant consistent with the North Park CPU PEIR.

The project would not significantly alter the drainage pattern of the project site or area (refer to Hydrology discussion). The project would connect with the existing storm drain system, with runoff following the same flow directions as the existing condition. The project would construct a curb outlet at the southwest corner of the site on Kansas Street, and runoff would be directed to towards the curb inlet in University Avenue and ultimately discharge to the San Diego Bay. The project would be conditioned to comply with the City's Storm Water Regulations during and after construction. The project would not require new or expanded off-site facilities. Impacts would be less than significant consistent with the North Park CPU PEIR.

Regarding water and wastewater infrastructure, the project site is located in an urbanized area where water and wastewater service is provided. The necessary infrastructure improvements to wastewater and water infrastructure are required as part of the project approval process and would occur within developed areas with no potential for significant environmental impacts associated with the construction of and/or improvements to utility infrastructure. The project would maintain

or improve the existing system in adherence with sewer and water regulations and conformance with the General Plan and proposed North Park CPU policies. Impacts would be less than significant consistent with the North Park CPU PEIR.

Given the developed nature of the project site and surrounding area and the number of private communication systems providers available to serve the North Park area, there is capacity to provide communications systems services to the project site. The project would not require new or expanded off-site facilities that would result in potentially significant environmental impacts. Impacts would be less than significant consistent with the North Park CPU PEIR.

The project would generate solid waste during construction and operation. Given that the project involves the construction, demolition and/or renovation of 40,000 SF or more of building space, a project-specific WMP was prepared to estimate how much solid waste would be generated during construction and operation (Baranek Consulting Group 2026; Appendix H). Based on that analysis, the project would produce 137.4 tons of waste generation during project construction. The project's construction phase disposal rate would fall below the threshold for having direct impacts on solid waste services (i.e., 1,500 tons of waste or more). The project would achieve both 75 percent diversion of construction waste, as well as its targeted 98 percent diversion rate for waste generated during preconstruction activities. The project's estimated operational solid waste generation of 78.7 tons during project occupancy would remain above the 60 tons per year threshold established for cumulative solid waste impacts. Project diversion activities during occupancy would achieve a 61 percent diversion rate and the project applicant would implement an operational waste reduction program outlined in the WMP which would increase diversion and minimize the project's contribution to cumulative solid waste disposal. The project would also recycle and/or salvage construction waste consistent with City C&D Ordinance. As a condition of approval, the applicant would be required to implement the construction-related and operational waste reduction measures outlined in the WMP. Therefore, the project would comply with the City's ordinances related to the storage, diversion and recycling of waste and would not affect the City's ability to achieve its waste reduction goals and help preserve solid waste capacity. Direct and cumulative project impacts on solid waste management would be less than significant consistent with the North Park CPU PEIR and Complete Communities FEIR.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the conclusions identified in the North Park CPU PEIR or the Complete Communities FEIR. The project would not result in any new significant impacts, nor a substantial increase in the severity of impacts from those described in the North Park CPU PEIR or the Complete Communities FEIR.

Health and Safety

North Park CPU PEIR

Existing policies and regulations would help reduce the potential risks of wildland fires. The General Plan and North Park CPU contain goals and policies to be implemented by the City's Fire-Rescue Department, and through land use compatibility, training, sustainable development, and other measures, these goals and policies are aimed at reducing the risk of wildland fires. Additionally, future development would be subject to conditions of approval that require adherence to the City's

Brush Management Regulations and requirements of the California Fire Code. As such, impacts relative to wildland fire hazards are identified as less than significant in the North Park CPU PEIR.

The proposed North Park CPU and associated discretionary actions would not result in hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 miles of an existing or proposed school. The North Park CPU PEIR identifies less than significant impacts.

The North Park CPU PEIR identifies less than significant impacts associated with adopted emergency response or emergency evacuation plans.

Although there are hazardous materials sites (consisting of closed leaking underground storage tank (LUST) and Cleanup Program sites and open Cleanup Program sites) within the North Park community, there are local, State, and Federal regulations and programs in places that minimize the risk to sensitive receptors on or adjacent to hazardous materials sites. Adherence to these regulations would result in less than significant impacts relative to hazardous materials sites.

Impacts relative to safety hazards related to being located within an airport influence area are identified as less than significant in the North Park CPU PEIR.

Complete Communities FEIR

The Complete Communities FEIR found that the Complete Communities Program would not expand the locations where multifamily residential development could occur and thus would not result in new residential areas being exposed to potential wildfire risk. However, due to the allowance for additional height and FAR, development under the Complete Communities Program could result in additional residents in certain locations compared to what would be allowed without the Complete Communities Program. Future development under the Complete Communities Program would be required to comply with the City's Fire Code, Building Regulations, and Brush Management Regulations, which would ensure that people and structures are protected from potential wildland fire hazards. While implementation of and adherence to this regulatory framework would reduce potential wildfire impacts, the increase in the number of residents located within areas at risk of wildland fires could increase the exposure of people and structures to wildfires and impacts would be significant and unavoidable.

The Complete Communities FEIR determined that the land uses that would be developed per the Complete Communities Program are not anticipated to result in hazardous emissions or exposure to acutely hazardous materials. In accordance with City, State, and Federal requirements, any new development that involves contaminated property would necessitate the clean-up and/or remediation of the property in accordance with applicable requirements and regulations. No construction would be permitted to occur at a contaminated site until a "no further action" clearance letter from the County's Department of Environmental Health (DEH), or a similar determination is issued by the SDFD, California Department of Toxic Substances Control (DTSC), Regional Water Quality Control Board (RWQCB), or other responsible agency. Therefore, impacts on schools associated with hazardous emissions or hazardous substances are identified in the FEIR as less than significant.

The Complete Communities FEIR determined that implementation of the Complete Communities Program would be in accordance with City, County, State, and Federal requirements, and any new development that involves contaminated property would necessitate the clean-up and/or remediation of the property in accordance with applicable requirements and regulations. No construction would be permitted at such locations until a "no further action" clearance letter from the County's DEH, or a similar determination is issued by the SDFD, DTSC, RWQCB, or other responsible agency. Therefore, impacts related to hazardous materials sites and health hazards were determined to be less than significant.

The Complete Communities FEIR concluded that implementation of the Complete Communities Program would not substantially impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan. The San Diego County Emergency Operations Plan identifies a broad range of potential hazards and a response plan for public protection and identifies major interstates and highways within San Diego County that could be used as primary routes for evacuation. Additionally, the County of San Diego Multi-Jurisdiction Hazard Mitigation Plan (MJHMP) provides methods to help minimize damage caused by natural and man-made disasters. The City and the Office of Emergency Services (OES) of San Diego County continue to coordinate to update the MJHMP as hazards, threats, population, and land use, or other factors change to ensure that impacts on emergency response plans are less than significant. Therefore, impacts related to emergency evacuation and response plans associated with Complete Communities are identified in the FEIR as less than significant.

The Complete Communities FEIR determined that implementation would be consistent with adopted ALUCPs as future development would be required to show compatibility with the requirements of the ALUCPs, the SDMC, and associated FAA requirements. Impacts related to aircraft-related hazards are identified in the FEIR as less than significant.

Project

The project is in a heavily urbanized area, surrounded by development, and has no interface with wildlands. According to the City of San Diego Official Very High Fire Hazard Severity Zone (VHFHSZ) Map No. 20, the project site is not located within a VHFHSZ (City of San Diego 2025). As part of standard development procedures, the project plans would be submitted to the City for review and approval to ensure that adequate emergency access is provided to and from the project site. The project would be constructed to comply with the California Fire Code and SDMC requirements, and as such, would not expose people or structures to a significant risk of loss, injury, or death involving wildfire hazards.

There are several schools located within 0.25 miles of the project site, including The Charter School of San Diego, North Park Christian School, Jefferson Elementary School, Alba Community Day School, and the French Montessori School of San Diego. The project consists of a multifamily residential use with commercial space on the bottom floor. These types of uses would not generate hazardous emissions, or the handling of hazardous or acutely hazardous materials, substances, or waste. Thus, the project would not result in hazardous emissions or the handling of hazardous materials, substances, or waste within 0.25 miles of a school.

Pertinent information regarding emergency response in the project area vicinity is provided in the County MJHMP and related documents. The plan is a comprehensive resource document that serves many purposes such as enhancing public awareness, creating a decision tool for management, promoting compliance with state and federal program requirements, enhancing local policies for hazard mitigation capability, and providing inter-jurisdictional coordination. Developed with input from a number of County organizations, local cities and other entities, the Board of Supervisors for the County adopted the revised 2023 MJHMP on February 7, 2023 (County of San Diego 2023). The County General Plan includes information on emergency evacuation in the Mobility and Safety elements, with reference to the Office of Emergency Services Unified San Diego County Emergency Services Organization Operational Area Emergency Plan (County of San Diego 2022). Specifically, Annex Q (Evacuation) of the plan notes that: "Primary evacuation routes consist of major interstates, highways and prime arterials within San Diego County …," with I-805 and I-15 identified in the project vicinity The project is also located within 2 miles of other major interstates and highways, including Interstate 8 and State Route 163, which are also identified as primary evacuation routes. The County plan also notes that "Local jurisdictions will work with … applicable agencies/departments to identify evacuation points and transportation routes." The project is located on a developed parcel in a community that is largely built out with existing major roads that provide a means for emergency evacuation. The project would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan; therefore, impacts are less than significant, and no mitigation would be required.

The project site is not included on a list of hazardous materials sites identified by the California DTSC or the State Water Resources Control Board (SWRCB). No hazardous materials sites are identified by the DTSC within 1,000 feet of the project site (DTSC 2025). There are ten sites identified in the SWRCB GeoTracker within 1,000 feet of the project site, including Leaking Underground Storage Tank (LUST) Cleanup Sites and Cleanup Program Sites; however, all sites within 1,000 feet of the project site are identified as completed, with cases closed. As such, the project would not result in impacts associated with hazardous materials sites.

Implementation of the project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Construction of the project would involve the transport, use, and disposal of hazardous materials such as fuel, solvents, chemicals, and oils associated with operating construction equipment. Although small amounts of fuel, solvents, chemicals, and oils would be transported, used, and disposed of during the construction phase, these materials are typically used in construction projects and would not represent the transport, use, and disposal of actively hazardous materials. In addition, the transport of the aforementioned materials would comply with all applicable regulations and requirements and therefore, would not create a significant hazard to public health.

The project site is located in the ALUCOZ, AIA Review Area 2, and the FAA Part 77 Notification Area for SDIA. In Review Area 2, only airspace protection and overflight policies and standards apply. The FAA has issued a determination of no hazard to air navigation for the project; thus, the proposed structure would not adversely affect safety in air navigation (FAA 2023a, 2023b, 2023c, 2023d).

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the conclusions identified in the North Park CPU PEIR or the Complete

Communities FEIR. The project would not result in any new significant impacts, nor a substantial increase in the severity of impacts from those described in the North Park CPU PEIR or the Complete Communities FEIR.

Energy

North Park CPU PEIR

The North Park CPU PEIR does not contain an analysis of energy impacts.

Complete Communities FEIR

The Complete Communities FEIR found that the Complete Communities Program would not create a land use pattern that would result in a wasteful, inefficient, or unnecessary use of energy. Additionally, future projects would be subject to existing building and energy codes regulations in place at the time that they are implemented. Thus, the Complete Communities Program would not conflict with any state of local plan for renewable energy or energy efficiency. The Complete Communities FEIR identifies less than significant impacts associated with energy.

Project

The project would be required to comply with CBC energy efficiency requirements and applicable CAL Green building standards. Compliance with existing regulatory standards would ensure that the project would not result in wasteful, inefficient, or unnecessary use of energy and would be compliant with State plans. Impacts would be less than significant consistent with the Complete Communities FEIR.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the conclusions identified in the Complete Communities FEIR. The project would not result in any new significant impacts, nor a substantial increase in the severity of impacts from those described in the Complete Communities FEIR.

Wildfire

North Park CPU PEIR

The North Park CPU PEIR does not contain an analysis of wildfire impacts beyond that contained in the Health and Safety subsection and described under the Health and Safety heading above.

Complete Communities FEIR

The Complete Communities DEIR determined that the Complete Communities Program would result in significant and unavoidable wildfire impacts, including impacts associated with the exposure of people or structures to a significant risk involving wildfire; exacerbation of wildfire risks and exposure of people to pollutant concentrations from a wildfire; the installation or maintenance of infrastructure that may exacerbate fire risks; and the exposure of people or structures to significant risks, including downslope or downstream flooding or landslides as a result of runoff, post-fire slope instability, or drainage changes.

The allowance for additional height and floor area ratio could result in additional residents in certain locations. Adherence to the City's Fire Code, Building Regulations, and Brush Management Regulations would ensure that people and structures are protected from potential wildland fire hazards; however, an increase in the number of residents located within areas at risk of wildland fires could increase exposure of people and structures to wildfire risks and could allow additional residents to be exposed to pollutants associated with wildfire.

Given the program level of the FEIR and that future specific development projects were unknown at the time of FEIR preparation, the Complete Communities FEIR concludes that the physical impacts associated with installation of and/or improvements to utilities infrastructure would result in significant wildfire risks. Further, the FEIR identifies significant flooding risk related to development downstream of the provisionally accredited levy in Mission Valley, resulting in a potentially significant impact associated with flooding as a result of runoff, post-fire slope instability, or drainage changes.

All wildfire impacts are identified in the Complete Communities FEIR as significant and unavoidable. There is no feasible mitigation to reduce wildfire impacts to below a level of significance.

Project

The project site is not located within a VHFHSZ (City 2025). The project site is located within an urbanized area and is surrounded by urban development. The project would not exacerbate wildfire risks or expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. The project would not require the installation of or maintenance of infrastructure such as roads, fuel breaks, emergency water sources, power lines, or other utilities that may exacerbate fire risk. The project area is fully urbanized with existing infrastructure in place. Further, the project site is located on a relatively flat, built-out site, surrounded by development. The project would not expose people or structures to significant risks as a result of runoff, post-fire instability, or drainage changes. The project would be required to comply with City's Fire Code and Building Regulations. Wildfire impacts of the project would be less than significant.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the conclusions identified in the Complete Communities FEIR. The project would not result in any new significant impacts, nor a substantial increase in the severity of impacts from those described in the Complete Communities FEIR.

VI. SIGNIFICANT UNMITIGATED IMPACTS

The North Park CPU PEIR EIR No. 380611/SCH No. 2013121076 indicated that direct significant impacts to the following issues would be substantially lessened or avoided if all the proposed mitigation measures recommended in the PEIR were implemented: noise (construction noise) and paleontological resources (for discretionary projects). The PEIR concluded that significant impacts related to air quality, noise (ambient noise levels and transportation noise levels for ministerial projects and construction vibration), historical resources, and paleontological resources (for ministerial projects) would not be fully mitigated to below a level of significance. With respect to cumulative impacts, implementation of the North Park CPU would result in significant impacts related to transportation/circulation, air quality, noise (ambient noise levels and transportation

noise levels for ministerial projects and construction vibration), historical resources, and paleontological resources (for ministerial projects) which would remain significant and unmitigated.

Mitigation measures were proposed in the PEIR to reduce direct and/or cumulative project impacts to less than significant; however, impacts to Transportation/Circulation, Air Quality, Noise, Historical Resources, and Paleontological Resources (for ministerial projects) were determined to be significant and unavoidable, as described below:

Significant but Mitigated Impacts

- Noise: Construction Noise (NOISE 6.6-1) [Direct (D)]
- Paleontological Resources: Discretionary Projects (PALEO 6.10) (D)

Significant and Unavoidable Impacts

- Transportation/Circulation: Intersections (TRANS 6.3-1–TRANS 6.3-8) [Cumulative (C)]
- Transportation/Circulation: Roadway Segments (TRANS 6.3-9–6.3-26) (C)
- Transportation/Circulation: Freeway Segments (TRANS 6.3-27–TRANS 6.3-32) (C)
- Transportation/Circulation: Ramp Meters (TRANS 6.3-33) (C)
- Air Quality: Conflicts with Air Quality Plan (AQ 6.41) (D/C)
- Air Quality: Air Quality Standards (AQ 6.42) (D/C)
- Noise: Ambient Noise Levels, Ministerial Projects (D/C)
- Noise: Transportation Noise Levels, Ministerial Projects (NOISE 6.6-1) (D/C)
- Noise: Vibration-Construction (NOISE 6.6-2) (D/C)
- Historical Resources: Historic Buildings, Structures, and Objects (HIST 6.71) (D/C)
- Historical Resources: Archaeological and Tribal Cultural Resources (HIST 6.72) (D/C)
- Paleontological Resources: Ministerial Projects (D/C)

Additionally, the Complete Communities FEIR (SCH. 2019060003) would result in significant and unavoidable direct impacts to air quality, biological resources, historical resources, hydrology and water quality, noise, public services and facilities, transportation, public utilities and infrastructure, wildfire, and visual effects and neighborhood character. Significant and unavoidable cumulative impacts are also identified in the Complete Communities FEIR for air quality, biological resources, historical resources, hydrology and water quality, noise, public services and facilities, transportation, public utilities and infrastructure, wildfire, and visual effects and neighborhood character. The Complete Communities FEIR concluded that development as a result of CCHS and CCMC could result in significant impacts related to the following issues (type of impact shown in parentheses):

Significant and Unavoidable Impacts

- Air Quality: Conflicts with Air Quality Plans (D)
- Air Quality: Air Quality Standards (D/C)
- Air Quality: Sensitive Receptors (D)
- Biological Resources: Sensitive Species (Discretionary Projects) (D/C)
- Biological Resources: Sensitive Habitats (Discretionary Projects) (D/C)
- Biological Resources: Wetlands (Discretionary Projects) (D/C)
- Historical Resources: Built Environment (D/C)
- Historical Resources: Prehistoric Archaeological Resources (D/C)
- Historical Resources: Tribal Cultural Resources (D/C)
- Hydrology and Water Quality: Flooding and Drainage Patterns (D/C)

- Noise: Ambient Noise Levels (D/C)
- Noise: Groundborne Vibrations (D/C)
- Public Services and Facilities: Public Facilities (D/C)
- Public Services and Facilities: Public Parks (D/C)
- Public Services and Facilities: Recreational Facilities (D/C)
- Transportation: VMT (D/C)
- Public Utilities and Infrastructure: Water Supply (D/C)
- Public Utilities and Infrastructure: Utility Infrastructure (D/C)
- Wildfire: Wildland Fires (D/C)
- Wildfire: Pollutant Concentrations from Wildfire: (D/C)
- Wildfire: Infrastructure: (D/C)
- Wildfire: Flooding or Landslides: (D)
- Visual Effects and Neighborhood Character: Scenic Vistas/Viewsheds (D)
- Visual Effects and Neighborhood Character: Neighborhood Character (D/C)
- Visual Effects and Neighborhood Character: Landmark Trees (D/C)
- Visual Effects and Neighborhood Character: Landform Alteration (D)

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

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

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

The project shall be required to comply with the applicable mitigation measures outlined within the MMRP of the previously certified North Park and Golden Hill CPUs Final PEIR, EIR No. 380611/SCH No. 2013121076 and the Complete Communities FEIR SCH No. 2019060003, which have been revised to current City standard mitigation measures, and those identified in the project-specific analyses herein. The following MMRP identifies the measures that specifically apply to this project.

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

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

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

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

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

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

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

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

Qualified paleontological monitor

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

CONTACT INFORMATION:
a) The PRIMARY POINT OF CONTACT is the **RE** at the **Field Engineering Division** and can be reached at (**858) 627-3200**
b) For Clarification of ENVIRONMENTAL REQUIREMENTS, contact **RE** and **MMC** at **(858) 627-3360.**

2. MMRP COMPLIANCE: This Project, PRJ-1055210 and/or Environmental Document PRJ-1055210 shall conform to the mitigation requirements contained in the associated Environmental Document and be implemented to the satisfaction of the DSD Environmental Designee (MMC) and the City Resident Engineer. The requirements may not be reduced or changed, but may be annotated (i.e., to explain when and how compliance is being met and the location of verifying proof, etc.).

Additional clarifying information may also be added to other relevant plan sheets and/or specifications as needed (e.g., specific locations, monitoring times, methodologies, etc.).

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

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

   Not Applicable

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

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

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

Document Submittal/Inspection Checklist		
Issue Area	**Document Submittal**	**Associated Inspection/Approvals/Notes**
General	Consultant Qualification Letters	Prior to the Preconstruction Meeting
General	Consultant Construction Monitoring Exhibits	Prior to or at the Preconstruction Meeting
Noise	Construction Drawings	Prior to grading permit, Noise Mitigation Features Inspection
Historical Resources	HABS Documentation	Prior to issuance of demolition permit for the Edward and Emma Newman Building
Historical Resources	Treatment Plan, Monitoring Plan	Prior to issuance of construction permit
Historical Resources	Monitoring Reports	Monitoring Plan milestones
Historical Resources	Construction Drawings for sidewalk marker	Prior to issuance of construction permit
Paleontology	Paleontology Reports	Paleontology Site Observation
Bond Release	Request for Bond Release Letter	Final MMRP Inspections Prior to Bond Release Letter

C. SPECIFIC MMRP ISSUE AREA CONDITIONS/REQUIREMENTS

NOISE

MM-NOI-1

1. Prior to the issuance of a grading permit, the Owner/Permittee shall submit grading plans that demonstrate that project construction shall achieve a 12-hour average sound level of less than 75 A-weighted decibel (dB(A)), satisfactory to the Chief Building Official.

   Best management practices shall be detail on all Project construction plans and shall include but are not limited to the following:

   A. Construction activities shall be limited to the hours between 7:00 a.m. and 7:00 p.m. Construction is not allowed on legal holidays as specified in SDMC Section 21.04, with exception of Columbus Day and Washington's Birthday, or on Sundays. (Consistent with SDMC Section 59.5.0404).
   B. Equip all internal combustion engine-driven equipment with intake and exhaust mufflers that are in good condition and appropriate for the equipment.
   C. Locate stationary noise-generating equipment (e.g., compressors) as far as possible from adjacent residential receivers.
   D. Acoustically shield stationary equipment located near residential receivers with temporary noise barriers.
   E. Utilize "quiet" air compressors and other stationary noise sources where technology exists.
   F. The contractor shall prepare a detailed construction plan identifying the schedule for major noise-generating construction activities. The construction plan shall identify a procedure for coordination with adjacent residential land uses so that construction activities can be scheduled to minimize noise disturbance.

G. Designate a "disturbance coordinator" who would be responsible for responding to any complaints about construction noise. The disturbance coordinator will determine the cause of the noise complaint (e.g., bad muffler, etc.) and will require that reasonable measures be implemented to correct the problem.

HISTORICAL RESOURCES

MM-HIST-1:

1. **HABS Documentation**

Prior to the issuance of a demolition permit for the Edward and Emma Newman Building, the Owner/Permittee shall submit the Historic American Building Survey (HABS) documentation as approved by City Heritage Preservation Staff for archival storage with the City of San Diego Historic Resource Board, South Coastal Information Center, the California Room of the City of San Diego Public Library, the San Diego Historical Society, and/or other historical society or group(s) to the satisfaction of the City of San Diego City Planning Department's Heritage Preservation staff. The building shall be documented according to Historic American Buildings Survey standards prior to interior, north exterior wall and roof demolition. Such documentation, including a written report, photographs, measured drawings and in some cases videotape, shall be prepared by a qualified professional to the standards determined by the National Park Service.

MM-HIST-2:

2. **Treatment Plan**

Prior to the issuance of any construction permits, the Owner/Permittee shall submit drawings that incorporate the Treatment Plan as approved by the Historical Resources Board (HRB) and/or City Heritage Preservation Staff to the satisfaction of the City of San Diego City Planning Department's Heritage Preservation staff. The Treatment Plan shall be prepared by a qualified historic architect to the Standards of the National Park service. The Treatment Plan shall include rehabilitation and restoration recommendations to minimize adverse impacts to the historical resource.

MM-HIST-3:

3. **Monitoring Plan**

a. Prior to the issuance of any construction permits, the Owner/Permittee shall submit a Monitoring Plan for review and approval by the City of San Diego City Planning Department's Heritage Preservation staff. During construction of the Project, the Owner/Permittee shall implement the Monitoring Plan as approved by City Heritage Preservation staff. The Monitoring Plan outlines procedures to identify and protect the historic building's significant character-defining features during project construction. The Project's Principal Investigator shall send monitoring reports at significant milestones as described in the Monitoring Plan to the City's Mitigation Monitoring staff and Heritage Preservation staff. The Principal Investigator shall submit a detailed letter to City staff prior to the start of work or during construction requesting a modification to the Monitoring Plan. This request shall be based on relevant information and site conditions.

MM-HIST-4:

4. **Sidewalk Marker**

Prior to the issuance of any construction permits, the Owner/Permittee shall submit drawings to the City of San Diego City Planning Department's Heritage Preservation staff for review and approval that specify the location of the existing historical marker in the sidewalk on University Avenue. The drawings shall indicate that the marker will be restored and shall be responsible for the long-term preservation and maintenance of the historical marker in perpetuity.

PALEONTOLOGICAL RESOURCES

MM-PALEO-1

I. Prior to Permit Issuance

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

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

II. Prior to Start of Construction

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

B. PI Shall Attend Precon Meetings
   1. Prior to beginning any work that requires monitoring; the Applicant shall arrange a Precon Meeting that shall include the PI, Construction Manager (CM) and/or Grading Contractor, Resident Engineer (RE), Building Inspector (BI), if appropriate, and MMC. The qualified paleontologist shall attend any grading/excavation related Precon Meetings to make comments and/or suggestions concerning the Paleontological Monitoring program with the Construction Manager and/or Grading Contractor.

a. If the PI is unable to attend the Precon Meeting, the Applicant shall schedule a focused Precon Meeting with MMC, the PI, RE, CM or BI, if appropriate, prior to the start of any work that requires monitoring.

2. Identify Areas to be Monitored
   Prior to the start of any work that requires monitoring, the PI shall submit a Paleontological Monitoring Exhibit (PME) based on the appropriate construction documents (reduced to 11x17) to MMC identifying the areas to be monitored including the delineation of grading/excavation limits. The PME shall be based on the results of a site specific records search as well as information regarding existing known soil conditions (native or formation).
3. When Monitoring Will Occur
   a. Prior to the start of any work, the PI shall also submit a construction schedule to MMC through the RE indicating when and where monitoring will occur.
   b. The PI may submit a detailed letter to MMC prior to the start of work or during construction requesting a modification to the monitoring program. This request shall be based on relevant information such as review of final construction documents which indicate conditions such as depth of excavation and/or site graded to bedrock, presence or absence of fossil resources, etc., which may reduce or increase the potential for resources to be present.

III. During Construction

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

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

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

IV. Night and/or Weekend Work

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

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

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

V. Post Construction

A. Preparation and Submittal of Draft Monitoring Report
   1. The PI shall submit two copies of the Draft Monitoring Report (even if negative), prepared in accordance with the Paleontological Guidelines which describes the

results, analysis, and conclusions of all phases of the Paleontological Monitoring Program (with appropriate graphics) to MMC for review and approval within 90 days following the completion of monitoring,

a. For significant paleontological resources encountered during monitoring, the Paleontological Recovery Program shall be included in the Draft Monitoring Report.
b. Recording Sites with the San Diego Natural History Museum
The PI shall be responsible for recording (on the appropriate forms) any significant or potentially significant fossil resources encountered during the Paleontological Monitoring Program in accordance with the City's Paleontological Guidelines, and submittal of such forms to the San Diego Natural History Museum with the Final Monitoring Report.

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

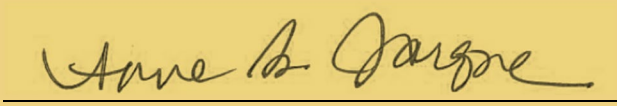
B. Handling of Fossil Remains
1. The PI shall be responsible for ensuring that all fossil remains collected are cleaned and catalogued.
2. The PI shall be responsible for ensuring that all fossil remains are analyzed to identify function and chronology as they relate to the geologic history of the area;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

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

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

VIII. CERTIFICATION

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



Anne B. Jarque, Senior Planner
Development Services Department

March 4, 2026
Date of Final Report

Analyst: Anne B. Jarque

Attachments:
- Figure 1: Regional Location
- Figure 2: Aerial Photograph
- Figure 3: Site Plan
- Figure 4: Renderings

Prior Environmental Documents and Appendices (Under Separate Cover)
- Environmental Impact Report No. No. 380611/SCH No. 2013121076
- Environmental Impact Report Complete Communities Program/SCH No. 2019060003
- Appendix A – Vehicle Miles Traveled Assessment
- Appendix B – Local Mobility Analysis
- Appendix C – Historical Resources Technical Report
- Appendix D – Update Geotechnical Investigation
- Appendix E – Response to City Review Comments on the Update Geotechnical Investigation
- Appendix F – Preliminary Drainage Letter
- Appendix G – Preliminary Stormwater Quality Management Plan
- Appendix H – Waste Management Plan

IX. REFERENCES

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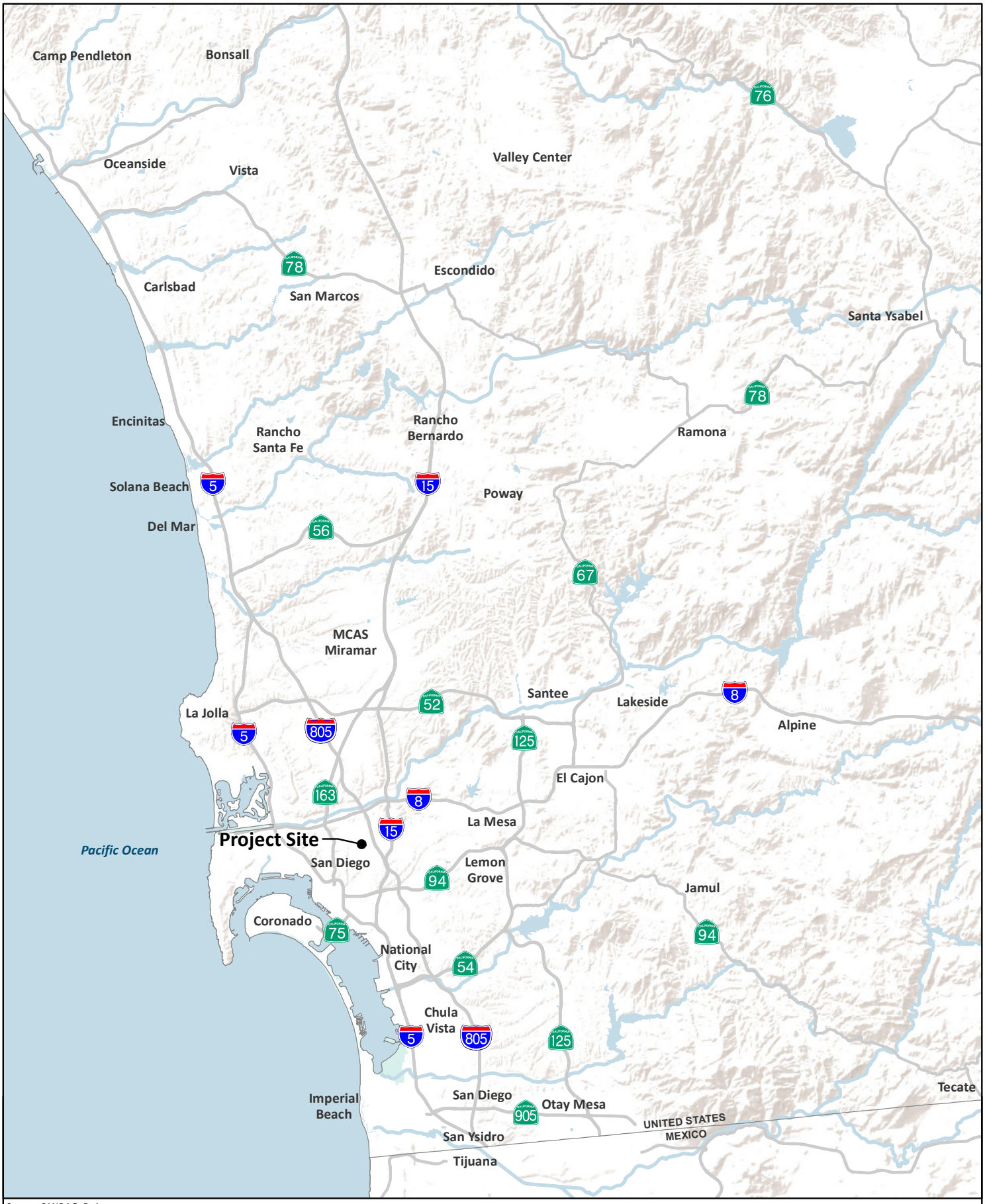


Source: SANDAG, Esri

N

0 6 Miles

Figure 1

Regional Location

NEWMAN BUILDING

Aerial Photo: Nearmap 2025

N

0 80 Feet

Figure 2

Aerial Photograph

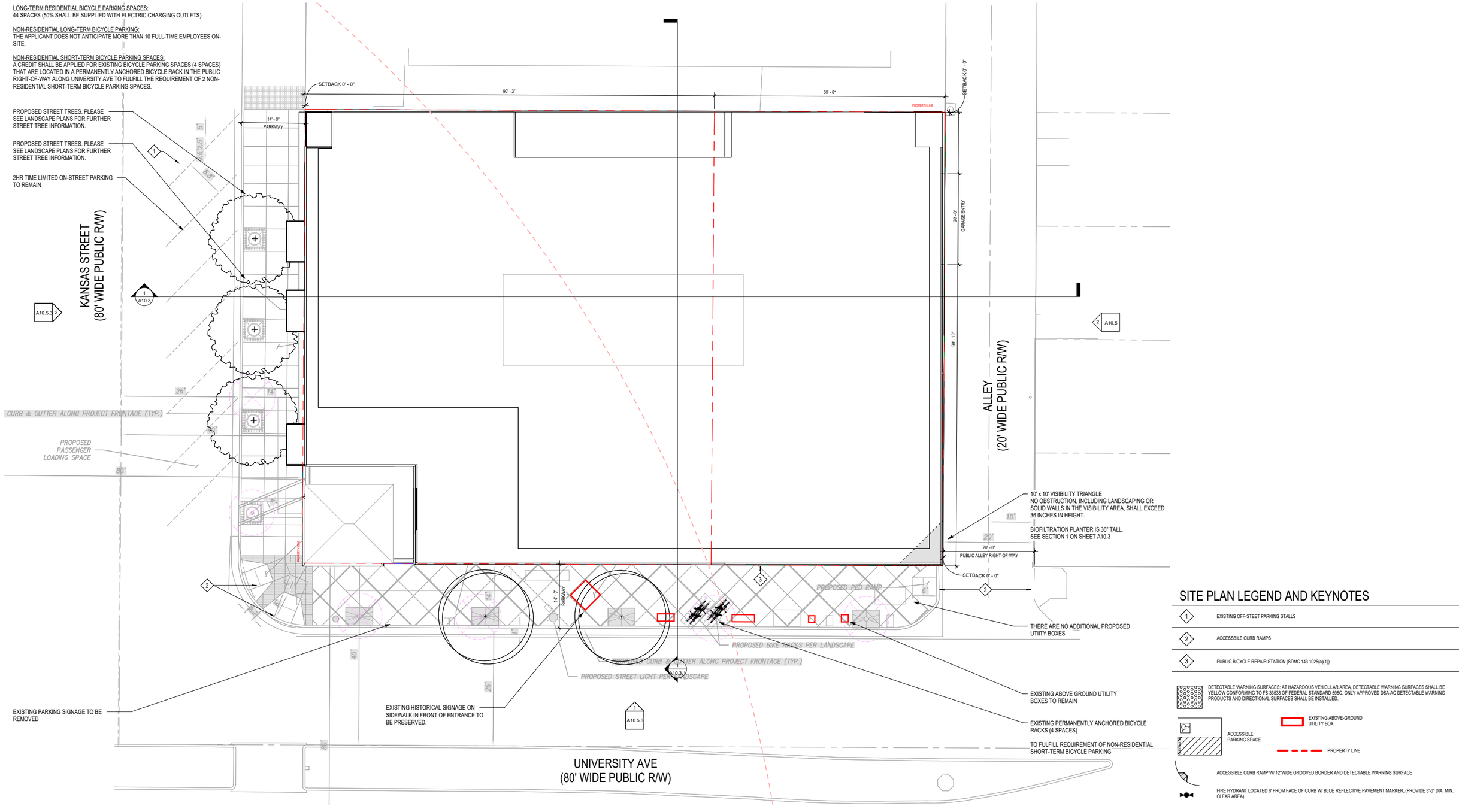
NEWMAN BUILDING

SECURE BICYCLE STORAGE ROOM:

LONG-TERM RESIDENTIAL BICYCLE PARKING SPACES:
44 SPACES (50% SHALL BE SUPPLIED WITH ELECTRIC CHARGING OUTLETS).

NON-RESIDENTIAL LONG-TERM BICYCLE PARKING:
THE APPLICANT DOES NOT ANTICIPATE MORE THAN 10 FULL-TIME EMPLOYEES ON-SITE.

NON-RESIDENTIAL SHORT-TERM BICYCLE PARKING SPACES:
A CREDIT SHALL BE APPLIED FOR EXISTING BICYCLE PARKING SPACES (4 SPACES) THAT ARE LOCATED IN A PERMANENTLY ANCHORED BICYCLE RACK IN THE PUBLIC RIGHT-OF-WAY ALONG UNIVERSITY AVE TO FULFILL THE REQUIREMENT OF 2 NON-RESIDENTIAL SHORT-TERM BICYCLE PARKING SPACES.



SITE PLAN LEGEND AND KEYNOTES

1. EXISTING OFF-STEET PARKING STALLS
2. ACCESSBILE CURB RAMPS
3. PUBLIC BICYCLE REPAIR STATION (SDMC 143.1025(a)(1))

DETECTABLE WARNING SURFACES: AT HAZARDOUS VEHICULAR AREA, DETECTABLE WARNING SURFACES SHALL BE YELLOW CONFORMING TO FS 33538 OF FEDERAL STANDARD 595C. ONLY APPROVED DSA-AC DETECTABLE WARNING PRODUCTS AND DIRECTIONAL SURFACES SHALL BE INSTALLED.

ACCESSIBLE PARKING SPACE

EXISTING ABOVE-GROUND UTILITY BOX

PROPERTY LINE

ACCESSIBLE CURB RAMP W/ 12"WIDE GROOVED BORDER AND DETECTABLE WARNING SURFACE

FIRE HYDRANT LOCATED 6' FROM FACE OF CURB W/ BLUE REFLECTIVE PAVEMENT MARKER. (PROVIDE 3'-0" DIA. MIN. CLEAR AREA)

Source: carrierjohnson + CULTURE 2025

Figure 3

Site Plan

NEWMAN BUILDING

1 RENDERING - SOUTH VIEW

2 RENDERING - SOUTHWEST VIEW

Source: carrierjohnson + CULTURE 2025

Figure 4

Renderings

NEWMAN BUILDING