THE CITY OF SAN DIEGO

ADDENDUM

Project No. 1129794
Addendum to EIR No. 586601 and
Complete Communities Program EIR
SCH Nos. 2017071007 and 2019060003

SUBJECT: **4545 MISSION BAY DRIVE:** COASTAL DEVELOPMENT PERMIT (CDP) for the demolition of an existing three-story, 66-room hotel totaling 16,640 square feet (SF), as well as the demolition and grading of other on-site features, such as existing paved hardscape, landscape areas and outdoor pool. The project entails the construction of a 77,600 SF, four-story, 100-room hotel building consisting of 55,724 SF of hotel building area with a 21,876 SF subterranean parking/basement area. On-site amenities would include an outdoor pool, garden patios and lounge areas for hotel guests. The 0.64-acre developed site is located at 4545 Mission Bay Dr (APN: 424-140-03-00) within the Balboa Avenue Station Area Specific Plan, Complete Communities: Mobility Choices Mobility Zone 2, Coastal (Non-Appealable) Overlay Zone, Coastal Height Limit Overlay Zone, Transit Area Overlay Zone, Parking Standards Transit Priority Area, Transit Priority Area, Base Zone CC-3-8, Cultural Resources Sensitivity Area: High, Paleontological Resources Sensitivity Area: Zero and Pacific Beach Community Plan Area (Council District 1). (LEGAL DESCRIPTION: LOT 2 OF HANSEN'S TRACT, CITY OF SAN DIEGO, COUNTY OF SAN DIEGO, STATE OF CALIFORNIA, ACCORDING TO MAP THEREOF NO. 4515, FILED IN THE OFFICE OF THE COUNTY RECORDER OF SAN DIEGO COUNTY, APRIL 20, 1960)

APPLICANT: Palacio Mission Bay LLC.

I. SUMMARY OF ORIGINAL PROJECT

As outlined in the 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. 2017071007) for the Balboa Avenue Station Area Specific Plan (Project No. 586601) certified by the City Council on September 10, 2019, per City Council Resolution No. R- 313753, and certified by the California Coastal Commission on December 17, 2021 (LCP-6-SAN-19-0165-3).

- 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 "BASASP PEIR" refers to the 2019 Balboa Avenue Station Area Specific Plan PEIR; and the term "Complete Communities FEIR" refers to the 2020 FEIR. The term "Complete Communities Program" refers to the Complete Communities: Housing Solutions and Complete Communities: Mobility Choices elements evaluated in the FEIR.

Balboa Avenue Station Area Specific Plan

The Balboa Avenue Station Area Specific Plan (BASASP) is a Specific Plan that amended the Pacific Beach Community Plan/Local Coastal Program (LCP) to revise figures and text to be consistent with the land use and mobility recommendations of the BASASP. The BASASP area encompasses a total of approximately 210 acres (0.33 square miles) and is bounded by Rose Creek on the west, Morena Boulevard on the east, Grand Avenue and Mission Bay Drive on the south, and Avati Drive on the north. The Community Plan Amendment for Pacific Beach redesignated and rezoned lands within the BASASP area to encourage and allow for public and private transit-oriented development (TOD) in the vicinity of the Balboa Avenue Station. The BASASP provides recommendations and guidelines for the public right-of-way (ROW) that emphasize access to the Balboa Avenue Station (trolley station) and capitalize on the regional transit connection in the BASASP area. The BASASP promotes increasing mobility options, decreasing dependency on single occupancy vehicles, and reducing traffic congestion at local intersections and roadways. The Clairemont Mesa Community Plan would also be amended to revise figures and text within the Community Plan to be consistent with the mobility recommendations of the BASASP. The BASASP did not redesignate or rezone any property within the Clairemont Mesa planning area. The BASASP further expresses General Plan and Community Plan policies within the Pacific Beach and Clairemont Mesa communities through the provision of area-specific recommendations that implement citywide goals and policies by allowing for TOD and multi-modal improvements.

Buildout of the BASASP allows up to 4,729 residential units, including 895 multifamily and two single-family dwelling units within the residentially designated areas, and up to 3,832 multifamily residential units within the Community Village designation. In addition, up to 614,313 SF of commercial retail uses and 423,444 SF of industrial uses could be developed within the BASASP area. An active commercial frontage is proposed along the main roadways in the BASASP area. In addition, the BASASP also identifies multi-modal improvements within the planning area to increase bicycle, pedestrian, and transit access to the Balboa Avenue Station.

Complete Communities Program

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, provide more 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: Housing Solutions and Mobility Choices (Complete Communities) Program

EIR evaluates the potential environmental effects of the program's two elements: Housing Solutions and Mobility Choices.

Housing Solutions 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 provide or 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 Housing Solutions 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, Housing Solutions 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 Mobility Choices 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. Mobility Choices created 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. Mobility Zones 1, 2, and 3 are VMT efficient where the average number of VMT per capita or per employee is less than 85 percent of the region, whereas Mobility Zone 4 is VMT inefficient with the average number of VMT per capita or per employee is greater than 85 percent of the region.

The Mobility Choices component of the program supports investments in active transportation and transit infrastructure—in the areas where that infrastructure is needed most—where the most reductions in overall VMT and greenhouse gas emissions reductions can be realized. The Mobility Choices program applies citywide to any new development for which a building permit is issued.

The Mobility Choices Regulations contained in SDMC Section 143.1100 are a programmatic approach to ensure citywide VMT reductions are implemented. The Active Transportation Measures (Appendix T to the Land Development Manual) and the Active Transportation In Lieu Fee are implementing components of the ordinance. Development in Mobility Zone 1 is not required to implement active transportation measures. Whereas multifamily residential in Mobility Zone 2 must follow TPA Parking Amenities requirements and all other developments in Mobility Zone 2 and all developments in Mobility Zone 3 are required to provide VMT reduction measures based on a list of measures in Appendix T that are each assigned a point value per unit of measure. Development in Mobility Zone 2 must include VMT Reduction Measures totaling at least 5 points, while development in Mobility Zone 3 must feature VMT Reduction Measures totaling at least 8 points. The VMT reductions must be located on-site or adjacent to the development site such that the measures can be shown on a site plan. For development within Mobility Zone 4, payment of an Active Transportation In-Lieu Fee is required in accordance with SDMC Section 143.1103(c). The 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 in Mobility Zone 4 are also 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 impacts of implementing Housing Solutions and Mobility Choices. The impacts of the Complete Communities Program, including both components, are combined and analyzed together in the FEIR. The current project is being processed in accordance with the Mobility Choices Regulations.

II. SUMMARY OF PROPOSED PROJECT

Project Features

The 0.64-acre project site is situated west of Interstate 5 (I-5) within the eastern portion of the Pacific Beach Community Plan area in the City (Figure 1, *Regional Location*). The project is requesting a CDP for the demolition of an existing three-story, 66-room hotel totaling 16,640 SF, as well as the demolition and grading of other on-site features, such as existing paved hardscape (Figure 2, *Aerial Photograph*). The project entails the construction of a 77,600 SF, four-story, 100-room hotel building consisting of 55,724 SF of hotel building area with a 21,876 SF, 84-space subterranean parking/basement area (Figure 3, *Site Plan*). On-site hotel amenities would include an outdoor pool, garden patios and lounge areas all of which whose use would be limited to hotel guests. To facilitate visitor and staff parking in the structured garage, mechanical car lifts would be operated 24 hour, 7 day a week by valet staff; self-parking would not be offered. Designated parking spaces for motorcycles and bicycles would be provided. Vehicular access to the project site would be provided by a new 24-foot wide two-way driveway along Mission Bay Drive, serving as the primary point-of-entry and exit for employees, visitors and guests.

The project site is located in a TPA (i.e., Mobility Zone 2) within 0.25-mile walking distance of four bus stops along Garnet Avenue and Grand Avenue and within 0.6-mile walking distance of the Blue Line Trolley Station along Morena Boulevard. The mobility improvements envisioned in the BASASP identify a pedestrian parkway and planned Class I (one-way) and Class II buffered bicycle facilities along the project frontage, which would be constructed by the project as follows. The existing contiguous sidewalk and parkway would be reconstructed with a non-contiguous sidewalk installed along the Mission Bay Drive frontage. Street trees and furnishings and pedestrian-scale lighting would be placed along the sidewalk as required by the Community Village design guidelines of the BASASP. The project would provide both a Class II buffered bike lane within the existing curb-to-curb width and a Class I multi-use path bicycle facility along the project frontage on Mission Bay Drive (as shown in Figures 3-5 and 3-6 of the BASASP). The existing on-street two-hour parking would be eliminated when the Class II buffered bike lane is installed. To comply with the Mobility Choices Regulations, the project is required to provide at least five points worth of VMT reduction measures for each non-residential land use per the SDMC Section 143.1103(b)(1), in accordance with Land Development Manual (Appendix T). The project would provide the following VMT reduction

measures which total 6 points and exceed the minimum points required to comply with the Mobility Choices Regulations:

- Pedestrian-scale lighting adjacent to public pedestrian walkways along the Mission Bay Drive frontage; (0.5 points)
- On-site fleet of five bicycles for shared use by hotel guests; (1.5 points) and
- Six on-site long-term bicycle parking spaces (i.e., one space more than minimum standard).

The City has developed a Mobility Evaluation Tool (MET) to help projects track compliance with the Mobility Choices Regulations and to support the implementation of Transportation Demand Management (TDM) measures that reduce VMT. These measures, in turn, help advance the goals of the City's Climate Action Plan (CAP) and are referred to as Ordinance Tracking within the MET. Based on an evaluation of the project using the MET, the applicant would also provide an Employee Transit Discount and Subsidy Program as an additional benefit to encourage transit use among employees. The program would include the following elements (as discussed under Transportation below):

- Transit Fare Discount/Subsidy - Employees would be offered a transit fare discount or subsidy of 75 percent of the monthly cost of public transit passes.
- Employee Eligibility – 100 percent of full-time employees and part-time employees would be eligible for the full transit fare discount/subsidy.

Construction

Project construction would require 38,000 cubic yards (CY) of cut and no fill, resulting in 38,000 CY of export. The maximum cut would be 16 feet. Construction is expected to occur over an approximately 15-month period.

III. ENVIRONMENTAL SETTING

The project site is located at 4545 Mission Bay Drive in the Pacific Beach community of San Diego, approximately 750 feet west of I-5, and consists of a 0.64-acre property on Assessor's Parcel Number (APN 424-140-03-00). The project site is fully developed with a three-story, 66-rooms, 16,640 SF hotel that was constructed in 1981 and is currently operational. In addition to the existing hotel structure, the site features paved parking areas, below-grade pool with deck and landscaping. The street frontage along Mission Bay Drive currently features a contiguous sidewalk; no pedestrian walkways or bikeways occur on any of the remaining project site boundaries. The site is topographically level at an elevation range of 18 to 25 feet above mean sea level (ASL). The property is within a 0.5-mile walking distance of the Blue Line Trolley Station along Morena Boulevard and local bus stops along Garnet and Grand Avenues. The project area surrounding the site consists of urban and developed uses. Adjacent land uses include an automobile dealership with a ramped parking garage to the north and east, Mission Bay Drive to the west, and a paved private drive to the immediate south, with a retail establishment south of the private drive. The project site is served by existing public services and utilities.

The site is zoned Community-Commercial (CC-3-8) and designated as Community Village (0 to 73 du/ac) by the BASASP and Pacific Beach Community Plan. The project site is within the Coastal (Non-Appealable) Overlay Zone, Coastal Height Limit Overlay Zone, Transit Area Overlay Zone, Parking Standards Transit Priority Area (PSTPA), and Transit Priority Area (TPA) Mobility Zone 2. The nearest airports to the project area include Montgomery Field, approximately 4 miles to the east, and Marine Corps Air Station Miramar, approximately 5 miles to the northeast. The project area is not located within the Airport Influence Area, a Safety Zone, or Federal Aviation Administration notification area associated with either of these airports.

IV. ENVIRONMENTAL DETERMINATION

The City previously prepared and certified the Balboa Avenue Station Area Specific Plan Program Environmental Impact Report (PEIR) No. 586601/SCH No. 2017071007 and Complete Communities: Housing Solutions and Mobility Choices Program EIR SCH No.2019060003. Both EIRs are hereby incorporated by reference. Based on all available information in light of the entire record, the analysis in this Addendum, and pursuant to CEQA Guidelines Section 15162, the City has determined the following:

- There are no substantial changes proposed in the project which will require major revisions of the previous environmental document due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
- Substantial changes have not occurred with respect to the circumstances under which the project is undertaken which will require major revisions of the previous environmental document due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- There is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous environmental document was certified as complete or was adopted, shows any of the following:
    a. The project will have one or more significant effects not discussed in the previous environmental document;
    b. Significant effects previously examined will be substantially more severe than shown in the previous environmental document;
    c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
    d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous environmental 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

This Addendum include the environmental issues analyzed in detail in the previously certified BASASP PEIR, Complete Communities: Housing Solutions and Mobility Choices Program EIR, and the project-specific environmental analysis pursuant to CEQA. The analysis in this document evaluates the adequacy of the EIRs relative to the project and documents that the proposed modifications and/or refinements would not cause new or more severe significant impacts than those identified in the previously certified environmental documents.

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

Land Use

BASASP PEIR

According to Section 5.1 of the BASASP PEIR, potential land use plan consistency impacts would be less than significant because the goals, policies, and programs of the BASASP are consistent with existing applicable local and regional land use plans, policies, and regulations contained in the City's General Plan, Climate Action Plan, Pacific Beach Community Plan, Clairemont Mesa Community Plan, Balboa Avenue Revitalization Action Program, and Land Development Code Regulations. The BASASP was also deemed consistent with the policies of the California Coastal Act and SANDAG's San Diego Forward: The Regional Plan, in place at the time of its adoption, as demonstrated in the PEIR. Less-than-significant impacts are identified, and no mitigation is required.

The PEIR also concludes that the Specific Plan's environmental plan consistency impacts would be less than significant because planned improvements and future development would not encroach into sensitive resources in the Rose Creek Multi-Habitat Planning Area (MHPA) and the portion of the MHPA where development could occur does not contain sensitive resources and will be removed from the MHPA using a Boundary Line Adjustment. Future development adjacent to the MHPA will be required to comply with the Multiple Species Conservation Program (MSCP) Land Use Adjacency Guidelines as part of the Mitigation Framework for biological resources in the PEIR. Specifically, BIO-8 in Section 5.3 of the PEIR requires future development to address such issues as drainage, water quality, lighting, noise, barriers, invasive species, brush management and grading/development in accordance with Section 1.4.3 of the MSCP Subarea Plan. Less than significant environmental plan consistency impacts would occur upon implementation of the PEIR Mitigation Framework measures.

The BASASP enhances community connectivity by establishing an urban village and improved pedestrian, bicycle, and transit-oriented amenities. Therefore, the BASASP PEIR concludes that the plan would not physically divide an established community; impacts would be less than significant, and no mitigation is required.

Complete Communities PEIR

The Housing Solutions and Mobility Choices Regulations are consistent with the City's overarching policy and regulatory documents including the General Plan and SDMC. The Complete Communities: Housing Solutions and Mobility Choices PEIR analyzed compliance with San Diego Forward: The Regional Plan and determined that the Housing Solutions and Mobility Choices 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 proposed project would not generate any conflict with smart growth strategies. The Complete Communities PEIR 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 with 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 PEIR is consistent with applicable goals objectives, or guidelines of the General Plan and other applicable plans and regulations and impacts would be less than significant.

The Complete Communities PEIR 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 PEIR concluded that 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 would be less than significant.

The Complete Communities PEIR determined that 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 Airport Influence Area (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 PEIR identifies less-than-significant impacts.

Project

The project would redevelop an existing hotel property with a new lodging facility on a site that is zoned Community-Commercial (CC-3-8) and designated for Commercial in the General Plan and Community Village in the BASASP and Pacific Beach Community Plan. Pursuant to the Specific Plan, projects are to be reviewed for conformance with General Plan policies, Specific Plan policies and Supplemental Development Regulations (SDRs), and all other applicable regulations including base zones and overlay zone development regulations. The project would comply with the development regulations of the CC-3-8 zone and the applicable overlay zones (i.e., Coastal Overlay Zone, Coastal Height Overlay Zone, and Transit Area Overlay Zone) in terms of setbacks, building heights, massing, floor area ratio, landscape treatments, among other requirements. The following five SDRs from the BASASP are applicable to the project: SDR-2 (Visitor Commercial Uses); SDR-5 and SDR-6 (Mobility Improvements); and SDR-9 and SDR-10 (Multi-use Path Requirements). The project would be expected to generate less than 1,000 average daily trips (ADT) and less than 100 peak hour trips, thus excluding several of the SDRs from being applicable. Project compliance with the applicable SDRs is described below.

The project would retain a visitor-oriented commercial use (i.e., hotel) on the project site consistent with the uses within the CC-3-8 zone as further restricted by SDR-2. Consistent with SDR-4, SDR-9 and SDR-10, the project would construct frontage improvements along Mission Bay Drive that would enhance and expand the pedestrian and bicycle connections in the project areas as envisioned in the BASASP. Specifically, the Specific Plan mobility improvements identify a pedestrian parkway and planned Class I (one-way) multi-use path and Class II buffered bicycle lane along the project frontage. The existing contiguous sidewalk on site would be reconstructed with a non-contiguous sidewalk installed along the Mission Bay Drive frontage. Street trees, furnishings and pedestrian-scale overhead lighting would be placed as required by the Community Village design guidelines of the BASASP. The project would feature both a Class II buffered bike lane within the existing curb-to-curb width and a Class I multi-use path within the parkway along the project frontage on Mission Bay Drive. The existing on-street two-hour parking would be eliminated when the Class II buffered bike lane is installed. Refer to the Transportation discussion in this document for a description of the project's VMT reduction features proposed in compliance with the Mobility ChoicesRegulations.

To demonstrate compliance with SDR5 (Balboa Avenue and Moreno Boulevard Northbound Ramps) and SDR6 (Morena Boulevard and Jutland Drive) in the BASASP, a project-level Traffic Signal Warrant Analysis was conducted (C2 Consulting Collaborative 2026a; Appendix J). Turning movement counts were collected at both SDR intersections during typical peak hour conditions to address the peak hour warrant in accordance with Council Policy 200-06. To address the remaining seven warrants at the two intersection locations, signal warrant worksheets for the 2953 Bunker Hill Street project (PRJ-1132845) were obtained, reviewed and incorporated into the project's Traffic Signal Warrant Analysis. In addition, trip generation, distribution, and assignments were prepared to determine how project traffic would access the surrounding roadway network and to identify the number of project trips that would reach the two SDR study intersections. For consistency, the trip directional

distribution developed for the project follows the same framework from the signal warrant analysis prepared for the 2923 Bunker Hill Street project.

Based on the trip distribution, net new project trips used for screening and assignment purposes were estimated to be 51 AM peak hour trips and 47 PM peak hour trips after accounting for existing on-site motel traffic. The trip assignment indicated that approximately 5 percent of project trips would travel to/from Balboa Avenue east of I-5 (i.e., 30 daily trips and 2 peak hour trips through the Morena Boulevard Northbound Ramp intersection). No project traffic was assigned to the Morena Boulevard/Jutland Drive intersection because the intersection is not likely to serve project generated traffic.

The project's Traffic Signal Warrant Analysis conducted a comprehensive analysis at both SDR intersections, including all eight signal warrants, in accordance with Part 4 of the California MUTCD (refer to Attachment C of Appendix J for warrant worksheets). The analysis determined that project-generated traffic would meet three of the eight signal warrants at SDR-5 (Balboa Avenue and Morena Boulevard Northbound Ramps) with signal warrant 5 not applicable to the project. The project would contribute 6 AM peak hour trips and 7 PM peak hour trips to the Balboa Avenue and Morena Boulevard Northbound Ramp intersection. The analysis further determined that three of the eight signal warrants would be met at SDR-6 (Morena Boulevard and Jutland Drive) with signal warrant 5 not applicable to the project. No project-generated traffic was assigned to the intersection of Morena Boulevard and Jutland Drive based on the assumed trip distribution and assignments.

Based on the Traffic Signal Warrant Analysis, project traffic would contribute up to 0.36 percent of the peak hour traffic utilizing the Balboa Avenue and Morena Boulevard Northbound Ramp intersection and no traffic at the Morena Boulevard and Jutland Drive intersection. The project design would implement mobility improvements in a TPA, as envisioned in the BASASP and Complete Communities Program. Payment of its fair share contribution to the cost of the Balboa Avenue/Morena Boulevard NB Ramp partial signal specified in SDR--5 as a condition of approval would comply with the intent of the BASASP. No land use plan or policy consistency impacts would occur.

The project site is not adjacent to the Rose Creek MHPA; therefore, the MSCP Land use Adjacency Guidelines would not be applicable to the project and less than significant environmental plan consistency impacts would occur. Mitigation Measure BIO-8 in Section 5.3 of the PEIR is not required.

The project would redevelop an existing hotel property with a new lodging facility that would enhance community connectivity through its pedestrian and bicycle amenities required by the BASASP. Therefore, the project would not physically divide an established community; impacts 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 EIRs. The project would not result in any new significant impact, nor would a substantial increase in the severity of impacts from that described in the EIRs result.

Air Quality

BASASP PEIR

Air Quality is addressed in Section 5.2 of the BASASP PEIR. Because the BASASP would increase the development density and daily traffic volumes beyond what was included for the area in the Regional Air Quality Strategy (RAQS), the PEIR concludes that impacts associated with conformance to regional air quality plans would be potentially significant and mitigated once the City provides a revised housing and employment forecast to SANDAG, as required by Mitigation Measure AQ-1. The PEIR concludes that this inconsistency with the RAQS and State Implementation Plan (SIP) results in a significant and unavoidable impact, which would be reduced to less than significant when the RAQS and SIP are updated by the City, in accordance with Mitigation Measure AQ-1.

Based on an evaluation of criteria pollutant emissions conducted in the BASASP PEIR, construction phase and operational emissions associated with new development within the Specific Plan area could exceed City significance thresholds. Thus, the PEIR determined that the increase in future emissions would result in a potentially significant air quality impact and mitigation measures are identified. Mitigation Measure AQ-2 requires an analysis of construction-phase air quality impacts at the time future development projects are proposed to determine if measures are required to reduce project-level construction emissions reduction measures identified in Mitigation Measure AQ-3 are required for future individual development projects that would exceed daily construction emissions thresholds. Mitigation Measure AQ-4 requires an evaluation of project-level operational air quality emissions and the incorporation of measures to reduce the emissions to below significance. Because there is no guarantee that all future development, including ministerial projects, would successfully implement the mitigation framework, the PEIR determined that air pollutant impacts from the construction and operation of future development could be significant and unmitigated.

With regard to cumulative air emissions, future development within the BASASP planning area would result in ozone precursor (i.e., volatile organic compounds) emissions which could contribute to existing violations of the state and federal ozone standards. Particulate (i.e., PM_{10} and $PM_{2.5}$) emissions produced by future development could also contribute to existing violations of their respective standards. Thus, the PEIR determines that Specific Plan impacts would be potentially significant and unavoidable cumulative impact to air quality in the San Diego Air Basin (SDAB) because the ability of future development to implement the mitigation framework could not be guaranteed.

With regard to the exposure of sensitive receptors to carbon monoxide (CO) and toxic air contaminants (TACs) emissions, the PEIR analysis indicates there would be no potential for CO hot spots or exposure of sensitive receptors to substantial, project-generated, local CO emissions. It also concludes that the implementation of future development under the BASASP would not expose sensitive receptors to substantial construction-related TAC concentrations. Thus, the PEIR concludes that air quality impacts to sensitive receptors from construction and operation of future development would be less than significant.

Although the BASASP area is adjacent to industrial operations, there are no known sources of long-term odors in the area. In addition, there are no agricultural operations in the BASASP area which

would generate odors. Similarly, future development under the BASASP would not produce objectionable odors, and less-than-significant impacts are identified in the PEIR.

Complete Communities PEIR

The Complete Communities PEIR 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 prepare and implement plans to attain the standards by the earliest practicable dates. The two pollutants addressed in the SIP and RAQs are reactive organic gases (ROG) and nitrous oxides (NOx), which are precursors to the formation of ozone. The SIP and the RAQS, which in conjunction with the transportation control measures (TCMs), serve as the air quality plans of the 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 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 Housing Solutions Regulations would also occur sporadically over time including both transportation infrastructure improvements and development incentivized by the Housing Solutions 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 Housing Solutions Regulations are identified in the FEIR as significant.

Operational emissions are long term and include mobile and area sources. The Mobility Choices 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 PEIR assumed that development under the Housing Solutions could exceed emissions levels compared to existing plans, as the Housing Solutions could increase multifamily residential densities within the Housing Solutions project areas. While the Mobility Choices 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 Housing Solutions 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 will 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 CO hot spot occurrence with build-out of the proposed community plan updates. As the Housing Solutions 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 Housing Solutions 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 Housing Solutions 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 Mobility Choices 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 Housing Solutions Regulations would contribute trips to local roadways. The Mobility Choices 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 Mobility Choices Program would affect vehicular mode share or roadway/intersection operations. Therefore, localized CO emissions associated with the Mobility Choices 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 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 Housing Solutions Regulations) and Mobility Zones 1, 2, and 3 (for the Mobility Choices 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 CC-3-8 zoning and Community Village land use designation in the BASASP and Pacific Beach Community Plan. The project would contribute to the significant and unavoidable impact associated with the RAQS consistency identified in the BASASP PEIR and Complete Communities EIR. The mitigation framework in both EIRs requires the City to submit a revised land use plan to SANDAG for updating growth projections contained in the RAQS. In 2022, the RAQS were updated by the SDAPCD, including the growth associated with the implementation of the BASASP and Complete Communities Program. Therefore, the project's impact would be less than significant.

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. An Air Quality Study was conducted on the project in accordance with Mitigation Measure AQ-2 and AQ-4 from the BASASP PEIR to address project-level construction and operational emissions (BlueScape Environmental 2025; Appendix A). Based on that analysis, the project's daily and annual emissions of criteria pollutants from construction activities would be well below the City's significance thresholds. As such, construction impacts would be less than significant, and the project would not be required to implement BASASP PEIR Mitigation Measure AQ-3 requiring construction-phase emissions reduction measures.

Sources of operational emissions associated with the project include traffic generated by the project, and area source emissions. Operational emissions modeling was conducted for the project in the Air Quality Study, which was prepared to comply with Mitigation Measure AQ-4 from the BASASP PEIR. The analysis determined that the net daily and annual project operational emissions would not exceed the City's project-level significance thresholds. In addition, the project would implement improvements would result in the installation of transportation infrastructure and amenities that would support a decrease in vehicular mode share traffic, as anticipated in the BASASP PEIR and Complete Communities PEIR. Nonetheless, the project would contribute to the significant and

unavoidable air quality impact identified in the Complete Communities PEIR. The project would comply with the Complete Communities program and the Mobility Choices Regulations, which would minimize the project's contributions to air emissions via its design features and required transportation improvements. No mitigation is required.

The project site is located approximately 0.25 miles from the intersection of Garnet Avenue and Mission Bay Drive, which was evaluated for localized air pollution effect by conducting a CO hot spot analysis in the BASASP PEIR. The analysis determined that the intersection would not 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 BASASP and associated discretionary actions would be less than significant. In both cases, construction toxic air emissions were determined to be less than significant upon implementation of projects in the BASASP and compliance with the Complete Communities Program. As the proposed project is consistent with the Specific Plan, 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, project 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 EIRs. The project would not result in any new significant impact, nor would a substantial increase in the severity of impacts from that described in the EIRs result.

Biological Resources

BASASP PEIR

The majority of the Specific Plan area contains developed and/or disturbed habitat and eucalyptus woodland which are not considered sensitive vegetation communities. A small amount of area contains sensitive vegetation which can also support sensitive wildlife and plant species. Potentially significant impacts to sensitive plant and wildlife species directly through the loss of habitat or indirectly by placing development adjacent sensitive habitats were identified in Section 5.3 of the BASASP PEIR. Impacts would be mitigated in accordance with the City's Environmentally Sensitive Lands (ESL) Regulations, Biology Guidelines and provisions of the MSCP Subarea Plan, in accordance with the Mitigation Framework in the BASASP PEIR. Mitigation Measure BIO-1 requires a survey for sensitive vegetation and plants for undeveloped lands within the Specific Plan area and adherence to the requirements of the City's Biology Guidelines and MSCP Subarea Plan. With regard to sensitive bird species adjacent to Rose Creek, Mitigation Measures BIO-2 and BIO-3 require evaluations of the adjacent habitats for the suitability to support Ridgway's rail and least Bell's vireo and implementation of project-specific mitigation in accordance with City regulations. To reduce impacts to nesting birds within the BASASP area, project would implement Mitigation Measure BIO-4 which requires compliance with the City's MHPA Land Use Adjacency Guidelines which restrict construction

noise and require pre-construction surveys and nesting season avoidance, if species are present. Mitigation Measure BIO-5 requires site-specific biologic surveys to determine if any other sensitive or MSCP Covered species are present on the project site and the implementation of habitat-based mitigation and/or compliance with the MSCP Subarea Plan conditions of coverage, as applicable. Although future development has the potential for significant impacts to sensitive species, implementation of the PEIR Mitigation Framework would ensure that impacts would be reduced to less than significant.

Potential impacts to sensitive habitats, such as Diegan coastal sage scrub and non-native grassland communities, would be significant according to Section 5.3 of the BASASP PEIR and require mitigation. Impacts to eucalyptus woodland, non-native vegetation, disturbed habitat, and developed land, are not significant and do not require mitigation. Impacts to sensitive upland vegetation and wetland habitats from future discretionary development would be mitigated in accordance with the City's Biology Guidelines, as outlined in the Mitigation Framework of the BASASP PEIR. Mitigation Measure BIO-6 requires preservation, restoration and/or creation of sensitive habitats for impacts to sensitive uplands in accordance with the City Biology Guidelines. Mitigation Measure BIO-7 requires avoidance of wetland habitats, and if infeasible, mitigation to ensure no net loss in accordance with the City Biology Guidelines. Implementation of these mitigation measures, combined with compliance with the MSCP Subarea Plan, would reduce impacts to less than significant.

With regard to potential impacts to jurisdictional areas, the PEIR concludes that no direct impacts to wetlands are anticipated because the BASASP does not include development in areas containing potential jurisdictional features. Indirect effects to wetlands, which are regulated by Sections 401 and 404 of the Clean Water Act, Section 1600 of the California Fish and Game Code, and City Biology Guidelines are not anticipated. If impacts to jurisdictional areas were to occur, the PEIR concludes that they would be significant. Implementation of the PEIR Mitigation Framework would reduce them to less than significance. Specifically, Mitigation Measure BIO-7 would ensure avoidance and require mitigation to ensure no net loss, while Mitigation Measure BIO-8 requires projects to obtain permits from the regulatory agencies to ensure mitigation is acceptable to permitting agencies.

Because no development is proposed within Rose Creek, no impacts to wildlife movement within the wildlife corridor are anticipated in the BASASP PEIR. No mitigation is required.

In terms of potential conflicts with the provisions of the MSCP Subarea Plan and MHPA edge effects, future development within the BASASP planning area would generally avoid the MHPA and be consistent with the MSCP Subarea Plan. Future development proposed adjacent to MHPA would be required to comply with the MHPA Land Use Adjacency Guidelines which address requirements for grading and land development, drainage, toxic substances in runoff, lighting, barriers, invasive plant species, brush management, and noise. Adherence to these guidelines would avoid any future significant indirect impacts to resources protected by the MSCP Subarea Plan and no mitigation is required.

Future development within the BASASP would be required to comply with the City's ESL Regulations to avoid impacts to MHPA, wetlands, vernal pools, MSCP Covered Species and MSCP Narrow Endemic species. The PEIR states that a significant conflict with the ESL Regulations would not occur and impacts would be less than significant. No mitigation is required.

Future development projects within or adjacent to the MHPA or adjacent Rose Creek have the potential to introduce invasive species through the use of exotic/invasive plant species in landscaping, which would be considered a significant impact. The introduction of invasive species would be addressed through project compliance with the MHPA Land Use Adjacency Guidelines. No mitigation is required.

Complete Communities PEIR

The Housing Solutions 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 multi-family 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, 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, 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 Vernal Pool Habitat Conservation Plan (VPHCP). Development under Complete Communities program on sites with ESL that are processed with a Site Development Permit or Neighborhood Development Permit 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 PEIR, impacts associated with potential future discretionary development were unknown and therefore impacts were considered to be significant and unavoidable.

The Complete Communities PEIR 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 PEIR. Therefore, impacts associated with potential future discretionary development would be significant and unavoidable.

The Complete Communities PEIR 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 corridor and nursery sites would be less than significant.

The Complete Communities PEIR 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 would be less than significant with implementation of Complete Communities.

Project

The project site is fully developed and does not contain any biological resources or ESL. 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 consistent with the BASASP PEIR. No impact to biological resources would occur; 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 EIRs. The project would not result in any new significant impact, nor would a substantial increase in the severity of impacts from that described in the EIRs result.

Energy Conservation

BASASP PEIR

Build out of the BASASP would require construction-related energy consumption and long-term operational energy consumption as described in Section 5.4 of the BASASP PEIR. Implementation of the proposed project would not result in the use of excessive amounts of fuel or other forms of energy during the construction of future projects under the project as there are no known conditions in the BASASP area that would require non-standard equipment or construction practices that would increase fuel-energy consumption above typical rates. Thus, the PEIR concludes that short-term energy impacts would be less than significant.

Energy conservation measures required by applicable energy conservation regulations (e.g., CALGreen) and energy conservation policies included in the BASASP would avoid excessive energy consumption from VMT during the operation of future development in the BASASP area would avoid excessive encourage a reduction in energy consumption related to transportation. Thus, the PEIR concludes that long-term operational energy impacts would be less than significant.

Complete Communities PEIR

The Complete Communities PEIR 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 EIR identified less-than-significant impacts associated with energy.

Project

The project would be required to comply with California Building Code (CBC) Energy Efficiency requirements and applicable CALGreen 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 both the BASASP PEIR and Complete Communities EIR.

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

Geologic Conditions

BASASP PEIR

As stated in Section 5.5 of the BASASP PEIR, future development proposed under the BASASP would be required, at the project level, to conform to applicable City General Plan and other plans, as well as other pertinent regulatory/industry and code requirements related to geologic and safety concerns (e.g., the CBC and emergency response plans). Potential impacts related to geologic hazards would be avoided, reduced to an acceptable level of risk, or reduced below a level of significance through mandatory conformance with applicable regulatory/industry standard and codes. No mitigation is required to address geologic hazards such as ground shaking, fault rupture, landslides, mudslides, ground failure, or similar hazards.

With regard to erosion and sedimentation, the PEIR concludes that potential impacts related to erosion and sedimentation from implementation of the BASASP would be avoided or reduced below a level of significance through mandatory conformance with applicable regulatory/industry standard and codes, including applicable requirements under the City Storm Water Program and National Pollutant Discharge Elimination System (NPDES). No mitigation is required.

Section 5.5 of the BASASP PEIR addresses potential impacts from structures being located on a geological unit or soil that is unstable or that would become unstable and potentially result in on-site or off-site subsidence, expansive soil, or collapse. Future development activities would be subject to appropriate site- specific geotechnical review per applicable regulatory/industry standards. Therefore, the PEIR concludes that geologic instability would be avoided or reduced below a level of significance through mandatory conformance with applicable regulatory/industry standard and codes, including the International Building Code, CBC and pertinent City criteria. No mitigation is required.

Complete Communities PEIR

The Complete Communities PEIR 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 to geologic conditions.

The Complete Communities PEIR 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 to 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 PEIR determined that implementation of the Complete Communities Program would not result in impacts related to 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 PEIR 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 Incorporated 2024; Appendix B) to address geologic conditions of the site. Subsequent input from the geotechnical engineering contractor was also provided on the project design (Geocon Incorporated 2026a and 2026b; Appendix B) The site is not underlain by active, potentially active or inactive faults. The Rose Canyon Fault, Mount Soledad Fault and Mission Bay Fault are located in the project area, with the nearest to the site inferred approximately 250 feet away (i.e., Mission Bay Fault). 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 two surficial soil units (consisting of undocumented fill and Bay Deposits) and one formational unit (consisting of Old Paralic Deposits). Undocumented fill was encountered during geologic excavations to depths ranging from about 5 to 15 feet and possess a "very low" to "medium" expansion index. It is not considered suitable for supporting foundations or structural fills and would require remedial grading (Geocon Incorporated 2026a). The Bay Deposits (bay mud) exist below the undocumented fill extends to depths ranging from approximately 31 to

41 feet below the surface. The Bay Deposits are potentially liquefiable when subjected to strong ground motion and are subject to consolidation settlement under increasing loading. As such, the Bay Deposits are unsuitable in their present condition for the support of structures or structural fill. The Quaternary-age Old Paralic Deposits exist below the undocumented fill and Bay Deposits across the site at depths of approximately 41 and 31 feet below the existing surface. The Old Paralic Deposits are considered acceptable for support of fill and foundation loads for the development. Groundwater was encountered during the field investigation at depths ranging from about 24 to 27 feet below existing grades. According to the City's Seismic Safety Study, the site is situated in Geologic Hazard Categories 31 (Liquefaction) and 54 (Other Terrain).

Despite the lack of a permanent, near-surface groundwater table, the undocumented fill and Bay Deposits could be potentially susceptible to compression and liquefaction with foundation and structural recommendations, including remedial grading, provided in the project's geotechnical investigation for addressing these hazards (Geocon Incorporated 2024). 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 BASASP PEIR and Complete Communities PEIR, future development projects, such as the project, would be required to comply with the CBC and SDMC. Compliance with the CBC, the SDMC, and the site-specific geotechnical recommendations related to ground improvements and foundations contained in Appendix B would be implemented as conditions of approval to 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 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 indicates that the project would not result in seismically induced settlement assuming site-specific geotechnical recommendations are incorporated into the design. Thus, less than significant impacts associated with geological instability would occur.

The soil encountered on site has very low to medium expansion potential. The undocumented fill and Bay Deposits on site are not considered suitable to support the project; however, they may be removed during construction, depending on the finish grade elevation of the subterranean garage. The project geotechnical report contains site-specific recommendations to be implemented during project design development, grading, and construction (refer to Appendix B for details). The project would comply with the SDMC, CBC, and site-specific geotechnical recommendations, which would be project conditions of approvals, to reduce potentially significant impacts associated with expansive soils to a less-than-significant level.

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

Greenhouse Gas Emissions

BASASP PEIR

Section 5.6 of the BASASP PEIR addresses whether plan implementation would generate greenhouse gas (GHG) emissions, either directly or indirectly, that may have a significant impact on the environment. The projected GHG emissions to be generated from buildout of the BASASP were estimated for construction and operational sources. For the purposes of determining if the increase in GHG emissions would have an impact, GHG emissions attributable to the BASASP at full buildout were compared to GHG emissions associated with buildout under the adopted Community Plans. While the BASASP would increase aggregated GHG emissions over those of the adopted Community Plans at buildout (Year 2035), 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. The PEIR concludes that BASASP GHG emissions impacts would be less than significant.

The BASASP allows for the development of compact, walkable communities close to transit connections consistent with smart growth principles. The BASASP supports the multi-modal strategy of the SANDAG Regional Plan through improvements to increase bicycle, pedestrian, and transit access to the Balboa Avenue Trolley Station. Policies contained within the BASASP Land Use and Mobility Elements would serve to promote bus transit use as well as other forms of mobility, including walking and bicycling. The BASASP incorporates goals and policies intended to support the General Plan and CAP policies. Therefore, the PEIR concludes that the BASASP would be consistent with an applicable plan, policy or regulation adopted for the purpose of reducing GHG emissions and impacts would be less than significant.

Complete Communities PEIR

The Complete Communities PEIR 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, 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 PEIR 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 CALGreen 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, BASASP and Pacific Beach Community Plan land use designations and zoning for the site. As a commercial hotel development within a TPA 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 BASASP and Mobility Choices Program; thus, potentially reducing its GHG emissions by implementing VMT reduction measures as part of the project design. The proposed VMT reduction measures include pedestrian-scale lighting adjacent to public pedestrian walkways along the Mission Bay Drive frontage; on-site shared fleet of five bicycles for use by hotel guests; and six on-site long-term bicycle parking spaces (i.e., one space more than minimum standard. In addition, the project would offer transit subsidies to its employees to encourage their use of alternative transportation. As the project would be required to implement Mobility Choices Regulations and would provide a transit subsidy to employees, 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 and its implementing regulations 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 would be consistent with the GHG reduction strategies in the CAP, and less-than-significant impacts would occur. 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 EIRs. The project would not result in any new significant impact, nor would a substantial increase in the severity of impacts from that described in the EIRs result.

Historical and Tribal Cultural Resources

BASASP PEIR

Section 5.7 of the BASASP PEIR analyzes the potential impacts on historical, archaeological, and tribal cultural resources resulting from implementation of the BASASP. Implementation of future development within the BASASP planning area could result in an alteration of a historic building, structure, object, or site where an increase in density is proposed beyond the adopted Community Plan or current zoning. Impacts to historic resources would be significant and require compliance with the Mitigation Framework in the PEIR. Mitigation Masure HIST-1 requires projects proposing development of a building or structure in excess of 45 years of age address whether or not the

affected building or structure is historically significant in accordance with the Historic Resources Guidelines. If the project-specific determination is that the resource is historically significant, mitigation outlined in Mitigation Measure HIST-1 would be required as specified in the Historic Resources Regulations and Historical Resources Guidelines. Even with implementation of the PEIR Mitigation Framework, the degree of future impacts and applicability, feasibility, and success of future mitigation measures cannot be adequately known for each specific future project. Therefore, potential impacts to historic buildings, structures, objects, or sites, would remain significant and unavoidable.

Archaeological resources have been recorded within the 1-mile search of the BASASP planning area. Specifically, the entire BASASP area west of I-5 is within the recorded site boundaries of P-37-005017 (CA-SDI-5017; SDM-W-150/152), the ethnohistoric village of La Rinconada de Jamo (or Rinconada). This is a large and significant archaeological site that has been subject to vast disturbance over many years of ranching, road construction, and residential and commercial development. Additionally, there is potential for subsurface prehistoric or historic archaeological resources to be encountered on the east side of I-5. Though in an area predominately developed and disturbed, future development under the BASASP has the potential to result in significant impacts to prehistoric or historic archaeological resources, sacred sites, and human remains, including, but not limited to, areas within and/or in proximity to the village of La Rinconada de Jamo. The PEIR Mitigation Framework includes Mitigation Measure HIST-2 which requires a determination by City staff as to the potential for prehistoric or historic archaeological resources based on Historical Resources Sensitivity Maps and the completion of an archaeological resources evaluation in accordance with the City Guidelines, if there is the potential for prehistoric or historic archaeological resources on a project site. Measures to reduce project impacts to such resources would be defined in the project-specific evaluation. This mitigation, combined with the policies of the General Plan and the adopted community plan policies promoting the identification, protection, and preservation of archaeological resources, in addition to compliance with CEQA and Public Resources Code Section 21080.3.1 requiring tribal consultation early in the development review process, and the City's Historic Resources Regulations, 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. However, even with application of the existing regulatory framework and mitigation framework which would avoid future project-level impacts, the feasibility and efficacy of mitigation measures could not be determined at a program level of analysis. Thus, the PEIR concludes that potential impacts to prehistoric and historic archaeological resources, sacred sites, and human remains would be minimized but would remain significant and unavoidable.

Given the presence of known and potential tribal cultural resources within and immediately adjacent to the BASASP, future development implemented in accordance with the BASASP would potentially result in impacts to significant tribal cultural resources and, therefore, would be required to implement Mitigation Measure HIST-2, which addresses measures to minimize impacts to archaeological and tribal cultural resources. This mitigation, combined with the policies of the General Plan and the adopted community plan policies promoting the identification, protection, and preservation of archaeological resources, in addition to compliance with CEQA and Public Resources Code Section 21080.3.1 requiring tribal consultation early in the development review process, 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. However, even with application of the existing regulatory framework and mitigation framework which would avoid future project-level impacts, the feasibility and efficacy of mitigation measures cannot be determined at this program level of analysis. Thus, the PEIR concludes that potential impacts to tribal cultural resources, would be minimized but would remain significant and unavoidable.

Complete Communities PEIR

The Complete Communities PEIR 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 or obtain a Site Development Permit with deviation findings and site-specific mitigation would be required. The Complete Communities PEIR 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 PEIR acknowledges that while existing regulations and the Land Development Code (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 is developed with an existing hotel that was constructed in 1981 and was historically developed in the early 1960s, as evidenced by a review of historic aerial photographs. In addition, the project site is not identified as an existing historical resource in the BASASP PEIR. No potential for impacts to historical resources would occur upon demolition of the existing structure and implementation of the project. No mitigation is required.

Most of the Pacific Beach community, including the project site and surrounding areas, is developed. Nonetheless, the entire BASASP area west of I-5 where the project site is situated is within the mapped area of P-37-005017 (CA-SDI-5017; SDM-W-150/152). As noted in the PEIR, the recorded site is a large and significant archaeological site that has been subject to vast disturbance over many years of ranching, road construction, and residential and commercial development. In accordance with Mitigation Measure HIST-2, City staff evaluated the sensitivity of the project site using the CHRIS database search and determined that it has a high potential for impacts to a known prehistoric resource. However, no impacts to sacred sites and human remains are expected based on the Sacred Lands Search conducted by the City for the BASASP PEIR and the level of site disturbance. Assembly Bill (AB) 52 notification letters were sent March 6, 2025, to the Iipay Nation of Santa Ysabel, Jamul Indian Village, and the San Pasqual Band of Mission Indians. No requests for consultation were received. Based upon the above information, archaeological monitoring would be required in accordance with Mitigation Measure HIST-2 from the BASASP PEIR, as noted in Section VII of this document. Implementation of the measure would minimize impacts to

archaeological and tribal cultural resources. However, consistent with the BASASP PEIR and Complete Communities EIR, potential impacts to archaeological resources would be significant and unavoidable.

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

Human Health/Public Safety/Hazardous Materials

BASASP PEIR

Section 5.8 of the BASASP PEIR states that potential impacts related to hazardous materials and associated health hazards from implementation of the BASASP would be avoided through mandatory conformance with applicable regulatory/industry standard and codes, including approval from the County Department of Environmental Health (DEH)/Hazardous Materials Division (HMD) and other pertinent requirements as outlined in the PEIR. Impacts would be less than significant, and therefore, no mitigation is required.

Potential impacts related to flood hazards from implementation of the BASASP would be less than significant, because no development within the BASASP area would occur within the 100-year floodplain and would be located outside of potential tsunami/seiche and dam inundation areas. The BASASP would not expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding related to mapped 100-year floodplains or failure of a dam or levee, as well as flooding/inundation from a tsunami or seiche, and less-than-significant impacts would occur. No mitigation is required.

Based on the nature of the future development and the required compliance with associated criteria under the applicable guidelines pertaining to emergency preparedness and emergency response services, Section 5.8 of the PEIR concludes that implementation of the Specific Plan would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan and impacts would be less than significant. No mitigation is required.

The BASASP planning area is urbanized with low potential for wildfire hazards with the exception of some of the northeastern corner of the BASASP area, which is identified as within the very high fire hazard severity zone. Potential impacts related to exposing people or structures to significant risk of loss, injury, or death involving wildland fires from implementation of the BASASP would be less than significant, based on the fact that future developments would be required to comply with applicable state and City standards associated with wildfire hazards and fire prevention. No mitigation is required.

Complete Communities PEIR

The Complete Communities PEIR 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 floor area ratio (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 PEIR 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 DEH, or a similar determination is issued by the San Diego Fire-Rescue Department (SDFD), California Department of Toxic Substances Control (DTSC), Regional Water Quality Control Board (RWQCB), or other responsible agency. Therefore, impacts to schools would be less than significant.

The Complete Communities PEIR 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 PEIR 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 to emergency response plans are less than significant.

Therefore, impacts related to emergency evacuation and response plans associated with Complete Communities would be less than significant.

The Complete Communities PEIR 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 would be less than significant.

Project

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). There were five sites requiring clean up or sites that involve the storage of unregulated hazardous materials identified in the BASASP planning area surrounding the project site; none which are directly adjacent to the project site. A Phase 1 Environmental Site Assessment was conducted on the premises and determined that the only potential hazardous material on the project site is associated with asbestos containing materials (ACM) associated with the building materials used during construction of the existing building (Property Solutions 2014; Appendix C). Removal of ACM and other materials during the demolition of the structure would be conducted in accordance with applicable health and safety regulations governing the removal of such materials. As such, the project would not result in impacts associated with hazardous materials sites as anticipated in the BASASP PEIR.

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.

There are no schools located within 0.25 miles of the project site. The project consists of a commercial use which 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-5 identified in the project vicinity. 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 is in an 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), 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.

The project site is not located in a 100-year floodplain or hazard zone. There would be no potential impacts related to flood hazards from implementation of the project. The project site is not located in an AIA for local airports and would not present a hazard to air navigation; no impacts would occur.

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

Hydrology, Water Quality and Drainage

BASASP PEIR

The BASASP area is highly developed with impervious surfaces; therefore, the rate and/or volume of runoff is not likely to be increased by new development. Future development within the BASASP area would be subject to grading and drainage 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 BASASP area would be reduced when compared to the existing condition. Thus, Section 5.9 of the BASASP PEIR concludes that impacts related to surface runoff from implementation of the plan would be less than significant. No mitigation was required.

Future development would be subject to grading and drainage 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 planning area would be reduced when compared to the existing condition. Thus, the PEIR concludes that impacts to runoff related to development within the BASASP area would be less than significant. No mitigation was required.

Future developments adherence to storm water quality regulations, such as the City's Drainage Design Manual and Storm Water Standards Manual, would ensure that impacts related to water quality would be less than significant. No mitigation was required.

Complete Communities PEIR

The Complete Communities PEIR 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, 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 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 would be 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 Design (LID) and storm water Best Management Practices (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 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 would be less than significant.

Project

The project site is fully developed and currently 97 percent impervious. A project-specific Drainage Study and Priority Development Project (PDP) Stormwater Quality Management Plan (SWQMP) were prepared to address site-specific drainage conditions (KPFF Consulting Engineers 2026a and 2026b; Appendix D and Appendix E). No surface waters are present on the project site or nearby and the entire site was analyzed as one drainage area. The site currently discharges stormwater over the existing sidewalk adjacent to Mission Bay Drive and sheet flows into the gutter, which conveys surface runoff southwards into a storm drain catch basin which eventually discharges into Mission Bay. Proposed runoff would follow the same drainage pattern. The proposed condition would feature two drainage management areas with a reduction in impervious area to 93 percent.

Stormwater collected via area drains from the roof and lower floors would be conveyed to on-site flow through planters via gravity. The treated water would then flow to an existing 24-inch concrete storm drain line located in the southwest corner of the property's frontage ultimately leading to Mission Bay. The proposed site drainage condition has been designed to handle runoff from the entire site. The planter area and depth were selected to meet postconstruction hydromodification and pollutant-removal requirements. The project design 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 approximately 2.5 miles west of the Pacific Ocean and 0.5 miles north of Mission Bay, which connects to the Pacific Ocean 3 miles southwest of the project site. Topographically, the site is at an elevation of approximately 18 to 25 feet above MSL. The potential for the site to be affected by a tsunami is negligible due to its distance from the Pacific Ocean. 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 consistent with the findings in the BASASP PEIR and Complete Communities EIR.

The project is a PDP and would incorporate appropriate LID Practices, Site Design BMPs, Source Control BMP's, and Treatment Control BMPs (KPFF 2026b). The project is subject to hydromodification requirements that would be satisfied using on-site flow through planters that are sized in terms of area and depth for treatment. An infiltration feasibility was conducted on the proposed planters and deemed infeasible from a geotechnical engineering standpoint due to the presence of five feet or greater of fill across the site (Geocon Incorporated 2026a; Appendix B). As such, liners and subdrains are recommended in the design of the planned storm water devices and would be implemented as part of the final design. Additionally, the project would be required to implement a 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 existing building on site and construct a new building, it would not substantially alter the amount of 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 EIRs. The project would not result in any new significant impact, nor would a substantial increase in the severity of impacts from that described in the EIRs result.

Noise

BASASP PEIR

According to PEIR Section 5.10, implementation of the BASASP could potentially expose new development to exterior or interior noise levels in excess of the Land Use – Noise Compatibility Guidelines established in the City's Noise Element, which would result in an inconsistency with City standards and a potentially significant noise impact. The PEIR Mitigation Framework includes Mitigation Measure NOI-1 which requires new development to conduct a site-specific acoustical analysis if the project consists of noise sensitive residential receptors which would be exposed to exterior noise levels in excess of the standards contained in the City's Land Use-Noise Compatibility Guidelines. The acoustical analyses would identify site-specific noise reduction measures to ensure that design features are incorporated into the projects to reduce exterior and interior noise levels to acceptable levels. Implementation of actions pursuant to Mitigation Measure NOI-1, along with compliance with state and local noise control laws, including Section 1207.4 of Title 24, would ensure that impacts related to noise levels which exceed standards would be less than significant for future development.

With regard to permanent increases to existing ambient noise levels, the PEIR concludes that traffic produced during BASASP implementation would increase ambient noise levels by more than 3 CNEL along one roadway segment of Santa Fe Street between Damon Avenue and Balboa Avenue. The future noise environment, however, would be dominated by highway traffic noise, which would overshadow any increased traffic noise on local streets in close proximity to the freeways. Because exterior noise levels along the impacted segment would remain below 65 CNEL, exclusive of freeway noise, implementation of the Specific Plan would not result in a significant increase in ambient noise levels on this roadway or any other analyzed local roadway. Therefore, the PEIR concluded that traffic noise impacts would be less than significant and no mitigation was required.

In terms of ground-borne vibration impacts, future development proposed within the screening distances (i.e., 120 to 600 feet) of the tracks along the rail line through the BASASP area and development proposing vibratory construction equipment would require further analysis to determine whether potentially significant impacts to vibration sensitive land uses would occur. Impacts due to ground-borne vibration could be potentially significant and the PEIR Mitigation Framework includes Mitigation Measures NOI-2 and NOI-3 to reduce vibration-related impacts to less-than-significant levels. Mitigation Measure NOI-2 requires a site-specific vibration study if development is proposed within the Federal Transportation Association (FTA) screening distances related to train activity. Mitigation Measure NOI-3 requires a site-specific vibration study for proposed development that has the potential for construction-related vibration impacts within 200 to 600 feet of vibration-sensitive uses. In both cases, proposed development affected by vibration or producing construction-related vibration would be required to incorporate the measures from the vibration studies into their design or construction operations to reduce vibration impacts to less-than-significant levels.

Section 5.10 of the BASASP PEIR addresses temporary construction noise impacts of future development within the BASASP planning area. Because construction noise attributed to future projects in the BASASP area would be regulated by the SDMC, construction noise impacts due to the

implementation of the BASASP would be determined by those projects' conformance to the Noise Ordinance. However, construction activities related to implementation of the BASASP would potentially generate short-term noise levels in excess of 75 A-weighted decibels (dBA) LEQ (12 hour) at adjacent properties. The ability for future projects to conform to the Noise Ordinance cannot be determined at the programmatic level. Noise impacts from construction activity within the BASASP planning area were considered potentially significant. The PEIR Mitigation Framework includes Mitigation Measure NOI-4, which requires future development projects in close proximity to noise-sensitive land uses to implement noise reduction measures to minimize short-term noise levels caused by construction activities. Implementation of Mitigation Measure NOI-4 would ensure that potential impacts would be less than significant. However, the PEIR concludes that construction-related noise impacts would be significant and unavoidable given that ministerial projects would not be required to comply with the PEIR Mitigation Framework.

Complete Communities PEIR

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 Housing Solutions 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 PEIR 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 which 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 PEIR 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 PEIR determined that impacts would remain potentially significant and unavoidable.

The Complete Communities PEIR found that construction activities related to implementation of the Complete Communities Program would potentially generate short-term noise levels in excess of 75 dBA Leq 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 associated with I-5 and Mission Bay Drive and stationary sources associated with nearby commercial uses. Vehicular traffic along I-5 is the dominant source affecting ambient noise levels in the project vicinity. According to noise contours presented in Figure 5.10-2 of the BASASP PEIR, the project site is currently exposed to noise levels of up to 65 CNEL primarily from vehicular travel along Mission Bay Drive. According to noise contours contained in Figure 5.10-3 in the BASASP PEIR, ambient noise along Mission Bay Drive near the project site is not expected to substantially increase by 2035. Table 5.10-5 of the PEIR shows that future noise would increase ambient noise by 0.9 CNEL in the project vicinity. Thus, projected noise levels would remain about 65 CNEL in the future and changes in ambient noise in the project vicinity would not be perceptible (i.e., less than 3 decibels). The changes in ambient noise would not result in significant noise exposure to existing and future noise-sensitive land uses (NSLUs). Therefore, the project would not expose NSLUs in the project area to ambient noise that exceeds the City's noise standards, and impacts would be less than significant. Mitigation Measure NOI-1 from the BASASP would not be required.

The project site is not located within areas identified by the BASASP PEIR as having incompatible noise levels (i.e., greater than 75 CNEL). The primary source of future noise would continue to be I-5 with its projected noise contours not affecting the project site. The project site is over 640 feet from the western travel lanes of I-5. Based on this distance, the exterior of the proposed hotel building would be exposed to noise levels between 60 and 65 CNEL due to future vehicular traffic in the project area. Therefore, redevelopment of an existing hotel site with a new hotel would be a compatible commercial use with the future noise environment described in the BASASP PEIR and less-than-significant impacts would occur.

As stated above, the project's traffic would contribute to 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., net new 595 ADT; C2 Consulting Collective 2026b) relative to the existing and future traffic volumes anticipated in the project 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 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 noise contours for any airports. As such, the project site would not be exposed to airport-associated noise in excess of 60 dB CNEL and there would be no need for overflight notification. No impact would occur.

The project features a commercial use 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 demolition of the existing structure, asphalt, and concrete; site preparation work; excavation of subgrade parking; foundation work; and building construction. These activities would generate temporary construction noise which would result in short-term elevated noise levels at nearby NSLUs. The city regulates noise associated with construction equipment and activities. SDMC Section 59.5.0404 contains standards related to hours and days of operation which would prohibit noise levels greater than 75 dBA LEQ (12-hour) at any residential property line. The project site is surrounded by commercial properties and no NSLUs occur in the project area; less than significant construction noise impacts would occur during project construction. Therefore, Mitigation Measure NOI-4 from the BASASP PEIR would not be required.

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 building nor are there any NSLUs adjacent to the project site; therefore, impacts from construction vibration would be less than significant. In addition, the 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 Mitigation Measures NOI-2 and NOI-3 from the BASASP PEIR.

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

Paleontological Resources

BASASP PEIR

According to Section 5.11 of the BASASP PEIR, potential impacts to paleontological resources from future ministerial projects within the BASASP planning area would be potentially significant, based

on the presence of underlying formational units exhibiting moderate to high potential for the occurrence of sensitive paleontological resources. The PEIR Mitigation Framework includes Mitigation Measure PALEO-1 which requires the implementation of paleontological review and monitoring during construction activities at a project-level and mitigation for the loss of important fossil remains. All future discretionary projects that would occur as a result of the project would be required to comply with Mitigation Measure PALEO-1, which would reduce project-level paleontological resources impacts associated with future discretionary development to below a level of significance. However, because the Mitigation Framework would not be applied to ministerial projects, the impact would remain significant and unavoidable.

Complete Communities PEIR

The Complete Communities PEIR 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 artificial fill which is further underlain by Bay Deposits and Old Paralic Deposits (Geocon Incorporated 2024), which have a high paleontological sensitivity (City of San Diego 2022). The undocumented fill occurs at depths ranging from about 5 to 15 feet and the Bay Deposits (bay mud) exist below the undocumented fill and extend to depths ranging from approximately 31 to 41 feet. The geotechnical borings conducted on site encountered Old Paralic Deposits in borings approximately 41 and 31 feet below the existing surface. The Preliminary Grading Plan prepared for the project states that project earthwork would result in 38,000 CY of cut at a maximum depth of 16 feet, and no fill would be required. Because the highly sensitive, Old Paralic Deposits occur deeper than proposed grading, no potential impacts to paleontological resources would occur upon project implementation. The project would not be required to implement Mitigation Measure PALEO-1 from the BASASP PEIR.

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

Population and Housing

BASASP PEIR

Section 5.12 of the BASASP PEIR address potential impacts to population and housing. The displacement of residents related to future development under the BASASP would be temporary in nature, as the overall number of dwelling units in the BASASP area would increase over time and no existing residential areas would be re-designated to non-residential uses. Therefore, the PEIR concludes that impacts related to the displacement of residents would be less than significant. No mitigation is necessary.

In terms of growth inducement, the PEIR indicates that no new or major expansion of infrastructure serving the area is anticipated to occur as a result of implementation of the BASASP. The Specific Plan includes planning, design, and implementation strategies intended to accommodate projected growth within the BASASP planning area, such as housing provision and non-vehicular transportation options. Outside the BASASP area, project-related growth is not expected due to the areas being largely built out. As a result, the PEIR concludes that impacts related to growth inducement would be less than significant and no mitigation is required.

Complete Communities PEIR

Population and housing was not addressed in detail in the Complete Communities Program EIR. Section 5.3 of the PEIR states that no adverse impacts to population or housing are anticipated from implementation of the proposed project. The Complete Communities Program was proposed to accommodate projected population and housing needs within the City for all income levels and would not induce unplanned population growth as there is a need for housing to serve projected population levels. Therefore, no impacts were identified.

Project

The project entails the redevelopment of an existing commercial property containing a hotel with a new hotel development that would not displace any residential housing units or residential population. The project would not require new or major expansion of infrastructure serving the area. As a commercial project, it would not result in any population growth changes. No impacts to population and housing would occur; 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 EIRs. The project would not result in any new significant impact, nor would a substantial increase in the severity of impacts from that described in the EIRs result.

Public Services

BASASP PEIR

Section 5.13 of the BASASP PEIR addresses whether plan growth patterns would result in the need for and/or provision of new or physically altered public facilities (including fire protection, police protection, parks or other recreational facilities, schools, or libraries), the construction of which could cause significant environmental impacts in order to maintain service ratios, response times, or other performance objectives. According to the PEIR, there is adequate fire protection available to meet the needs of future development. Thus, no new fire facilities would need to be constructed which could result in physical impacts on the environment. Likewise, no new construction of police facilities which could result in physical changes to the environment would occur as a result of BASASP implementation. The provision of additional parkland to serve the BASASP community could result in a physical impact on the environment which could be significant. However, there are no specific park improvement plans at the time the BASASP was proposed. Also, the construction of new park facilities would be subject to separate environmental review at the time design plans are available. With regard to school facilities, Government Code Section 65995 and Education Code Section 53080 authorize school districts to impose facility mitigation fees on new development to address any increased enrollment that may result. Future development proposals under the BASASP

would be required to pay applicable school impact fees prior to the issuance of building permits. No libraries were proposed in the BASASP; thus, no new construction of library facilities could result in physical changes to the environment were anticipated. Therefore, the PEIR concludes that impacts related to the provision or expansion of public facilities and services would be less than significant. No mitigation is required.

Complete Communities PEIR

The Complete Communities PEIR 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 Mobility Choices 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 PEIR 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 PEIR concluded that impacts would be significant and unavoidable.

Project

The project site is in an area served by the Northern Division of the San Diego Police Department. 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, BASASP and Pacific Beach Community Plan. As discussed in the PEIR, buildout of the BASASP would not require new construction of police facilities which could result in physical changes to the environment. The project would be subject to applicable Development Impact Fees (DIF) for public facilities financing in accordance with SDMC Section 142.0640 to offset demands.

The project site is in an area served by San Diego Fire-Rescue Department. The project would result in an incremental demand for fire protection and emergency response services; no changes in residential population would occur upon implementation of the project. According to the PEIR, no new fire facilities would need to be constructed during buildout of the BASASP which could result in physical impacts on the environment. The project would be subject to payment of DIF to offset demand for new fire protection facilities identified in the community.

The project would not generate new park users in the project area given its commercial nature and the transient nature of its occupants. Implementation of the BASASP provides policy support for increasing the amount of parkland in the area but does not propose construction of new facilities in an area that is deficient in public park space. New development would be subject to payment of DIF to offset demands for any new parks proposed in the community.

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 BASASP PEIR. No new students would be generated by the project due to its commercial use nature. The project would be required to pay mitigation fees to the applicable school district, consistent with the requirements of Senate Bill 50.

No new demand on library facilities would be generated by the project due to its commercial use nature. As discussed in the PEIR, construction of additional library facilities to meet library service requirements of the Pacific Beach community is not required. New development would be subject to payment of DIF to offset demands for any new library facilities proposed in the community.

In all cases, should new public service facilities be proposed in the project area in the future, their construction would be subject to environmental review pursuant to CEQA at the time of facility design and approval. Less than significant public service impacts would occur 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 EIRs. The project would not result in any new significant impact, nor would a substantial increase in the severity of impacts from that described in the EIRs result.

Public Utilities

BASASP PEIR

Section 5.14 of the BASASP PEIR addresses whether implementation of the plan would result in impacts to public utilities. Based on the findings of the Water Supply Assessment (WSA) prepared for the BASASP, the PEIR concludes that there would be sufficient water supply to serve existing and projected demands of the Specific Plan in normal and dry year forecasts during a 20-year projection. Therefore, impacts water supply would be less than significant, and no mitigation is required.

With regard to water distribution, wastewater collection, treatment and disposal, stormwater conveyance and communications, systematic improvements to water, wastewater, and storm water facilities throughout the BASASP planning area are expected to be provided as gradual replacement of aging and substandard infrastructure is needed. Upgrades in infrastructure, such as increasing the sizing and replacement of existing water, sewer, and storm water pipelines and mains are an ongoing process, which is administered by the Public Utilities Department (PUD) on a project-by-project basis. Any upgrades to and maintenance of public storm water facilities (or facilities granted and accepted via easement) are administered by the Transportation and Storm Water Department (T&SW) but implemented by private development applicants in accordance with City Council Policy 800-04. The PEIR concludes that impacts associated with modifications to water, sewer, and storm water utilities that could result in physical changes to the environment would be addressed on project-level environmental review. Therefore, impacts associated with infrastructure upgrades would be less than significant and no mitigation is required.

Future development projects under the BASASP must comply with City ordinances related to solid waste. Discretionary projects resulting in the construction, demolition, and/or renovation of 40,000 SF or more of building space have the potential to generate 60 tons or more of solid waste on a daily basis and would be required to prepare a project-specific Waste Management Plan (WMP). The WMP would address how the project could achieve the 75 percent waste reduction goal and its implementation would be made a condition of approval. Therefore, the PEIR concludes that impacts to solid waste management facilities would be less than significant and no mitigation is required.

Future development under the BASASP would not result in the use of excessive amounts of fuel or other forms of energy during the construction or operation. Energy conservation measures required by applicable energy conservation regulations (e.g., CALGreen) and energy conservation policies included in the BASASP would avoid excessive energy consumption from operations. Short-term and long-term energy impacts would be less than significant, and no mitigation is required.

Complete Communities PEIR

The Complete Communities FEIR found that, according to 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 a recent comprehensive community plan update, 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 CALGreen 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 PEIR 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 PEIR and without the benefit of project-specific development plans, both direct and cumulative impacts associated with the construction of storm water, water distribution, wastewater, and communication systems could be significant. Impacts would be significant and unavoidable.

The Complete Communities PEIR 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 PUD. The project would be serviced by the existing public water supply using new connections. The project would construct a 77,600 SF hotel building, consistent with the Community Village land use designation applied to the site in the BASASP and Pacific Beach Community Plan. 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 BASASP determined that there would be sufficient water supply to serve existing and projected demands of the planning area, and future water demands within the PUD's service area in normal and dry year forecasts during a 20-year projection. Although the new

hotel would increase demand for water as compared to the existing hotel, building code regulations would serve to ensure water-efficient fixtures are installed with the project and its demand for water is minimized. Therefore, the project would not use excessive amounts of water beyond available supplies. Impacts would be less than significant consistent with the BASASP PEIR.

Regarding water and wastewater infrastructure, the project site is located in an urbanized area where existing water and wastewater service is provided. Based on the project's Water Study, new water service connections to an existing public water main in Mission Bay Drive would be constructed on site for domestic water and irrigation water (KPFF 2026d: Appendix F). Similarly, the project's Sewer Study indicates that a new sewer lateral connection to an existing sewer main in Mission Bay Drive (KPFF 2026c; Appendix G) would be constructed as part of the project. 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 utility infrastructure. The project would maintain or improve the existing system in adherence with sewer and water regulations and conformance with the General Plan. Impacts would be less than significant consistent with the BASASP PEIR.

Given the developed nature of the project site and surrounding area and the number of private communication systems providers available to serve the project 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 BASASP PEIR.

The project would not significantly alter the drainage pattern of the project site or area (refer to the Hydrology discussion). The project would connect with the existing storm drain system, with runoff following the same flow directions as the existing condition. Stormwater collected via area drains from the roof and lower floors would be conveyed to on-site flow through bio-filtration planters via gravity. The treated water would then flow to an existing 24-inch concrete storm drain line located in the southwest corner of the property's frontage ultimately leading to Mission 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 BASASP PEIR.

The project would connect to existing communication systems in the project area and would not require new or expanded off-site facilities that would result in potentially significant environmental impacts. Project impacts would be less than significant, consistent with the BASASP PEIR.

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 24.7 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 9 percent diversion rate for waste generated during preconstruction activities. The project's estimated operational solid waste generation of 115.3 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 46 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 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 BASASP PEIR.

As discussed in the BASASP PEIR, future development pursuant to the Specific Plan would not result in the use of excessive amounts of fuel or other forms of energy during the construction. Similarly, energy conservation measures required by applicable energy conservation regulations (e.g., CALGreen) and energy conservation policies included in the BASASP would avoid excessive energy consumption from operations associated with future development, including the project. Less-than-significant impacts would occur.

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

Transportation/Circulation

BASASP PEIR

Section 5.15 of the BASASP PEIR addresses potential impacts to alternative transportation modes and conflicts with plans and policies supporting alternative transportation modes and systems. All recommended pedestrian, bicycle, and transit-related improvements contained in the BASASP would improve alternative transportation connectivity and accessibility within the Specific Plan Area. Facilities planned as part of the BASASP would increase, rather than decrease, the percent of alternative mode trips in the City's transportation system. Project effects on pedestrian facilities, bicycle facilities, and rail and bus facilities, therefore, would be beneficial to and increase trips on alternative transportation systems. The PEIR concludes that less-than-significant impacts would occur and no mitigation is required.

All recommended transit improvements would create new/enhanced alternative transportation opportunities within the BASASP. All recommendations also would improve alternative transportation connectivity and accessibility which would be beneficial and implement the policies, plans, or programs supporting alternative transportation modes rather than conflicting with them. BASASP implementation would not substantially adversely impact planned alternative transportation mode systems and would not result in adverse impacts to policies, plans, or programs supporting alternative transportation modes. No mitigation is required.

With regard to vehicular traffic circulation, traffic generated by the implementation of the BASASP would result in cumulatively significant level of service impacts to eleven roadway segments, five intersections, four freeway segments and two metered freeway ramp locations in the study area. Impact reduction would occur through the identification of necessary roadway, intersection, and freeway improvements to be carried out at a project level. The PEIR Mitigation Framework identifies

the required improvement to address these impacts. While Mitigation Measures TRANS 5.15--1 through TRANS 5.15-4, which require the widening of the impacted roadway segments, were identified in the PEIR to reduce potentially significant impacts to roadway segments; none of the measures were incorporated into the BASASP. With regard to intersections, Mitigation Measures TRANS 5.15-5, TRANS 5.15-6, TRANS 5.15-7, and -TRANS 5.15-9 identify various traffic signal and intersection improvements to mitigate the intersection impacts to a less than significant level and have therefore been incorporated into the Specific Plan as SDRs. No mitigation measures are identified for BASASP impacts to freeways because freeway improvements are not within the authority of the City. However, freeway mainline improvements identified in SANDAG's Regional Plan are contained in Mitigation Measure TRANS 5.15-10 in the PEIR Mitigation Framework. The PEIR Mitigation Framework also includes Mitigation Measure TRANS 5.15--11 to address ramp capacity at the impacted on-ramp locations, which includes the construction of additional lanes, interchange reconfigurations and other capacity improvements.

Because none of the roadway segment measures were considered feasible due to the impact on the adjacent development and cost of right-of-way acquisition, the PEIR concludes that roadway segment impacts along Garnet Avenue, Balboa Avenue, Mission Bay Drive, and Clairemont Drive of the BASASP would remain significant and unavoidable. Implementation of recommended improvements in the BASASP EIR were incorporated into the Specific Plan and would reduce impacts at the intersections of Mission Bay Drive/Damon Avenue, Mission Bay Drive/Garnet Avenue, Balboa Avenue/Garnet Avenue East of I-5, Mission Bay Drive/Grand Avenue, Balboa Avenue/Morena Boulevard, and Morena Boulevard/Jutland Drive to less-than-significant levels except at the intersection of Balboa Avenue at Clairemont Drive, which would remain significant and unavoidable upon implementation of the BASASP due to the infeasibility of the recommended improvements. .

Complete Communities PEIR

California implemented SB 743 to modernize transportation analysis and transition lead agencies from analyzing traffic impacts under CEQA from a congestion-based level of service (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 updated CEQA significance thresholds by utilizing VMT analysis, as directed by SB 743. The Complete Communities FEIR concludes that development in residential or commercial employment development areas with VMT efficiency at or below 85 percent of the base year regional average would have less-than-significant impacts. Future development of similar types would be expected to have similar levels of VMT to the 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 Housing Solutions Regulations combined with improvements resulting from the Mobility Choices 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. VMT

impacts associated with development under the Housing Program located in less VMT efficient areas would be significant and unavoidable.

The Complete Communities PEIR 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 Mobility Choices 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 would be less than significant.

Project

At the time the BASASP PEIR was certified, which became effective in September 2019 (outside the Coastal Zone) and in December 2021 within the Coastal Zone, CEQA required a transportation analysis to evaluate impacts based on traffic load and capacity of the street system using a level of service (LOS) standard. Subsequently, CEQA was revised and updated to prohibit use of LOS as the measure of the significance for 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, which 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 current version dated 2022). The Complete Communities EIR used VMT to analyze transportation impacts. The following analysis is based on the project's compliance with the Complete Communities Program EIR, in accordance with the City's TSM.

The project was evaluated under the VMT Screening Criteria for land development projects and a VMT Analysis was prepared to assess potential VMT impacts consistent with the TSM (C^2 Consulting Collective 2026b; Appendix I). The project-specific VMT Analysis addresses the project's VMT impacts using the SANDAG Series 14 Activity-Based Model (ABM 2+, Base Year 2016) screening map, as well as screening criteria based on the expected trip generation per the TSM. A commercial employment project located in a Census Tract (CT) that has a VMT per employee of below 85% of the regional average VMT/employee would be presumed to result in a less-than-significant impact.

The project's VMT Analysis was conducted using the SANDAG Regional Traffic Demand Model, which produces base year VMT per capita and VMT per employee maps that display the regional mean. The project is a commercial employment use that would generate approximately 595 net new ADT, with 51 AM peak hour trips (22 inbound and 29 outbound) and 47 PM peak hour trips (15 inbound and 32 outbound) when taking into account traffic generated by the existing hotel, which was determined using driveway counts per the TSM. The project is expected to generate approximately 900 unadjusted daily trips, including 72 AM peak hour trips and 81 PM peak hour trips. The project's VMT Analysis also applied the TSM lookup CT method because the project generates fewer than 2,400 unadjusted daily driveway trips. The project's CT produces 19.5 VMT per employee relative to the regional average of 18.9 VMT per employee, which translates to 103% of the regional average, exceeding the City's threshold of 85% or lower. The project would have significant transportation impacts related to VMT based on City thresholds. Therefore, compliance with the Mobility Choices

Regulations and incorporation of mitigation is required to reduce the project's significant VMT impact, to the greatest extent feasible, as described below.

According to SDMC Section 143.1103, the project is located in a TPA Mobility Zone 2. The Mobility Choices Regulations SDMC Section 143.1102(b) state that all development located within Mobility Zone 2 is required to provide VMT reduction measures totaling at least 5 points, based on a list of measures in Appendix T of the Land Development Manual that are each assigned a point value per unit of measure. The project design incorporates the following VMT reduction measures which total 6 points and exceed the minimum points required to comply with the Mobility Choices Regulations:

- Pedestrian-scale lighting adjacent to public pedestrian walkways along the Mission Bay Drive frontage (0.5 points);
- On-site fleet of five bicycles for shared use by hotel guests (1.5 points); and
- Six on-site long-term bicycle parking spaces (i.e., one space more than minimum standard) (4 points).

The project is expected to exceed the City's VMT significance threshold and would therefore result in a significant impact. Consistent with the Complete Communities: Housing Solutions and Mobility Choices PEIR Findings and SOCs, compliance with the Mobility Choices Regulations is mitigation to the extent feasible.

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

Visual Effects and Neighborhood Character

BASASP PEIR

Section 5.16 of the BASASP PEIR addresses potential impacts to public views, neighborhood character, and natural landforms. With regard to impacts to public views, no designated scenic roadways are located within the BASASP nor is the planning area within the viewshed of a scenic roadway outside the BASASP area. Similarly, no scenic sites are identified in either the Pacific Beach Community Plan/LCP or the Clairemont Mesa Community Plan. The BASASP modified the land use designations and zoning within the Pacific Beach community and established urban design policies and supplemental development regulations for lands designated Community Village. The only public viewing area adjacent to and within the BASASP area that contains a public resource is the Rose Creek open space, which has urban development fully built up to its edge. Although proximate to Mission Bay Park, park use areas are separated from the BASASP area by intervening uses, and accompanying views are focused southwesterly toward the bay (rather than toward the BASASP area to the north and east). The PEIR concludes that the implementation of the BASASP would not substantially alter or block public views from public viewing areas within the BASASP area. Therefore, impact levels would range from no impact to less than significant; no mitigation is required.

With regard to neighborhood character, the land use plan, policies, and recommended mobility enhancements of the BASASP, along with implementation of the LDC, would provide for a more unified visual character than currently exists, while not affecting the more consistent neighborhoods to the north, west, east or south. Proposed gateways in the BASASP would provide additional visual landmarks to enhance the overall visual quality and perception of the BASASP planning area. Although development intensity would increase, the project's land use and urban design policies would ensure that implementation of the BASASP would not negatively and substantially alter the character of the neighborhood. The PEIR concludes that less-than-significant impacts to neighborhood character would occur and no mitigation is required.

Potential landform alteration impacts would be less than significant because future development would mostly occur within the generally level portion of the BASASP area that is already developed, and such future development activities would not substantially alter existing natural landforms. Impacts related to landform alteration would be less than significant; no mitigation is required.

Complete Communities PEIR

The Complete Communities PEIR determined that the Program would apply citywide within TPAs in zones that allow 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 height and 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 Mobility Choices Regulations would have a less-than-significant impact related to scenic vistas or views. Development associated with the Housing Solutions 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 a 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 PEIR 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 PEIR concluded that development associated with Housing Solutions 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 Mobility Choices 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. Due to 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 analysis of impacts associated 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 review for projects that impact ESL-defined steep slopes, impacts could be significant. Therefore, the Complete Communities PEIR determined the program would result in significant and unavoidable landform alteration impacts.

Sources of light within the project areas where Complete Communities 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 Mobility Choices 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 CALGreen standards, 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 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

The project entails the demolition of an existing three-story, 66-room hotel surrounded by surface parking and the construction of a 77,600 SF, four-story, 100-room hotel building with a subterranean parking/basement area. The project would comply with the development regulations in the CC-3-8 zone as applied in the Coastal Overlay Zone, including setbacks, 30-foot building height limit, and FAR. Aesthetically, the project would feature modern building materials including cement plaster, aluminum framing, stone-look tile and wood accents. The project entry, lobby and covered arrival area and pool deck and terrace would be situated along the western boundary fronting Mission Bay Drive. The subterrain parking area would be placed behind and below the hotel structure toward the eastern portion of the site. Landscaping would comply with the LDC requirements and be installed along the proposed parkway adjacent to Mission Bay Drive and throughout the property in planters to accentuate the structure and its features. All rooftop equipment would be screened from view. Because there are no designated scenic roadways located within or adjacent to the viewshed of the BASASP and no scenic sites are identified in either the Pacific Beach Community Plan or the Clairemont Mesa Community Plan. The project would not have any impacts on designated view corridors nor substantially alter or block public views from public viewing areas within the BASASP area.

Although the project would intensify the site by constructing a larger hotel structure, the commercial site use would remain, and the project would comply with all applicable regulations and policies pertaining to visual character contained within the LDC and BASASP. The Urban Design policies of the BASASP encourage buildings to front directly onto and orient toward the public street, avoiding blank walls and encouraging active frontage elements to enliven the streetscape. The policies encourage enhanced building materials, textures and detailing at the ground level and into the building features using plane changes, entries and corners. Downward facing shielded pedestrian lighting along building frontages is also encouraged. Building massing and articulation policies, as well as structured parking placement below structures, are contained in the BASASP in order to produce development that has visual interest and pedestrian-oriented development along the

public realm. The project design integrates the policy intent of the Urban Design policies of the BASASP by enlivening the streetscape with an expanded parkway and the construction of a highly articulated building featuring that is oriented toward the street and features a range of building materials, as described above. Therefore, the project would not negatively and substantially alter the character of the neighborhood.

The project's landform alteration impacts would be less than significant given the developed nature and the generally level topography of the existing site. No natural landforms would be modified by the project.

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

VI. SIGNIFICANT UNMITIGATED IMPACTS

Balboa Avenue Station Area Specific Plan PEIR

The BASASP PEIR identifies significant impacts that would be mitigated to less-than-significant levels for Air Quality, Biological Resources, Noise, and Paleontological Resources. The PEIR identifies significant and unmitigated impacts related to Air Quality, Historical and Tribal Cultural Resources, Noise (vibration and construction), Paleontological Resources (ministerial development), and Transportation/Circulation (roadway and freeways). The PEIR identifies also significant unmitigated cumulative impacts related to Air Quality, Historical and Tribal Cultural Resources, Paleontological Resources, and Transportation/Circulation. The Direct (D) and Cumulative (C) impacts are noted below:

- Significant but Mitigated Impacts:
    - Air Quality: Sensitive Receptors (D/C)
    - Air Quality: Odors (D/C)
    - Biological Resources: Sensitive Species (D)
    - Biological Resources: Sensitive Habitats (D)
    - Noise: Compatibility with Noise Guidelines (D)
    - Paleontological Resources: Discretionary Projects (D)
- Significant and Unavoidable Impacts:
    - Air Quality: Regional Air Quality Plan (D/C)
    - Air Quality: Air Quality Standards (D/C)
    - Historical and Tribal Cultural Resources: Historic Structures, and Objects (D/C)
    - Historical Resources: Archaeological, Sacred Sites, Human Remains (D/C)
    - Historical Resources: Tribal Cultural Resources (D/C)
    - Noise: Vibration-Construction (D)
    - Noise: Construction (D)
    - Paleontological Resources: Ministerial Projects (D/C)
    - Transportation/Circulation: Roadway Segments (D/C)
    - Transportation/Circulation: Intersections (D/C)

- Transportation/Circulation: Freeway Segments (D/C)
- Transportation/Circulation: Ramp Meters (D/C)

Complete Communities: Housing Solutions and Mobility Choices Program EIR

The Complete Communities PEIR (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 EIR 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 Housing Solutions and Mobility Choices 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 maker was required to make specific and substantiated "CEQA Findings" which stated:

(a) specific economic, social, or other considerations which make infeasible the mitigation measures or project alternatives identified in the EIRs, and (b) the impacts have been found acceptable because of specific overriding considerations. Given that there are no new or more severe significant impacts that were not already addressed in the previous certified EIR, 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 EIRs.

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 BASASP PEIR, EIR No. 586601/SCH No. 2017071007. No project-specific measures are required as outlined in the analyses herein. The following MMRP identifies measures that specifically apply to this project.

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

1. Prior to the issuance of any construction permits, such as demolition, grading or building, or beginning any construction-related activity on-site, the Development Services Department (DSD) Environmental Designee 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:

Archaeological Monitor, Tribal Cultural 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 call RE and MMC at (858) 627-3360

2. **MMRP COMPLIANCE:** This Project, PRJ-1129794 and/or Environmental Document EIR No. 586601, and EIR SCH No. 2017071007 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.

   None required

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
Archaeology	Archaeology Reports	Archaeology/Historic Site Observation
Tribal Cultural Resources	Archaeology Reports	Archaeology Reports
Bond Release	Request for Bond Release Letter	Final MMRP Inspections Prior to Bond Release Letter

ARCHAEOLOGICAL RESOURCES and TRIBAL CULTURAL RESOURCES

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 Archaeological Monitoring and Native American monitoring have been noted on the applicable construction documents through the plan check process.

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 archaeological monitoring program, as defined in the City of San Diego Historical Resources Guidelines (HRG). If applicable, individuals involved in the archaeological monitoring program must have completed the 40-hour HAZWOPER training with certification documentation.
2. MMC will provide a letter to the applicant confirming the qualifications of the PI and all persons involved in the archaeological monitoring of the project meet the qualifications established in the HRG.
3. Prior to the start of work, the applicant must obtain written 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 (0.25-mile radius) has been completed. Verification includes but is not limited to a copy of a confirmation letter from South Coastal Information Center, 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.
3. The PI may submit a detailed letter to MMC requesting a reduction to the 0.25-mile radius.

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, Native American consultant/monitor (where Native American resources may be impacted), Construction Manager (CM) and/or Grading Contractor, Resident Engineer (RE), Building Inspector (BI), if appropriate, and MMC. The qualified Archaeologist and Native American Monitor shall attend any grading/excavation related Precon Meetings to make comments and/or suggestions concerning the Archaeological Monitoring program with the Construction Manager and/or Grading Contractor.
    a. If the PI is unable to attend the Precon Meeting, the Applicant shall schedule a focused Precon Meeting with MMC, the PI, RE, CM or BI, if appropriate, prior to the start of any work that requires monitoring.
2. Identify Areas to be Monitored
    a. Prior to the start of any work that requires monitoring, the PI shall submit an Archaeological Monitoring Exhibit (AME) (with verification that the AME has been reviewed and approved by the Native American consultant/monitor when Native American resources may be impacted) based on the appropriate construction documents (reduced to 11x17) to MMC identifying the areas to be monitored including the delineation of grading/excavation limits.
    b. The AME 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 site conditions such as depth of excavation and/or site graded to

bedrock, etc., which may reduce or increase the potential for resources to be present.

III. During Construction

A. Monitor(s) Shall be Present During Grading/Excavation/Trenching

1. The Archaeological Monitor shall be present full-time during all soil disturbing and grading/excavation/trenching activities which could result in impacts to archaeological resources as identified on the AME. 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 AME.
2. The Native American consultant/monitor shall determine the extent of their presence during soil disturbing and grading/excavation/trenching activities based on the AME and provide that information to the PI and MMC. If prehistoric resources are encountered during the Native American consultant/monitor's absence, work shall stop and the Discovery Notification Process detailed in Section III.B-C and IV.A-D shall commence.
3. The PI may submit a detailed letter to MMC during construction requesting a modification to the monitoring program when a field condition such as modern disturbance post-dating the previous grading/trenching activities, presence of fossil formations, or when native soils are encountered that may reduce or increase the potential for resources to be present.
4. The archaeological and Native American consultant/monitor shall document field activity via the Consultant Site Visit Record (CSVR). The CSVR's shall be faxed or emailed 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 Archaeological Monitor shall direct the contractor to temporarily divert all soil disturbing activities, including but not limited to digging, trenching, excavating or grading activities in the area of discovery and in the area reasonably suspected to overlay adjacent resources 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.
4. No soil shall be exported off-site until a determination can be made regarding the significance of the resource specifically if Native American resources are encountered.

C. Determination of Significance

1. The PI and Native American consultant/monitor, where Native American resources are discovered shall evaluate the significance of the resource. If Human Remains are involved, follow protocol in Section IV below.

   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.

   b. If the resource is significant, the PI shall submit an Archaeological Data Recovery Program (ADRP) which has been reviewed by the Native American consultant/monitor 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. Note: If a unique archaeological site is also an historical resource as defined in Guidelines Section, then the limits on the amount(s) that a project applicant may be required to pay to cover mitigation costs as indicated in CEQA Section 21083.2 shall not apply.

   c. If the resource is not significant, the PI shall submit a letter to MMC indicating that artifacts will be collected, curated, and documented in the Final Monitoring Report. The letter shall also indicate that that no further work is required.

IV. Discovery of Human Remains

If human remains are discovered, work shall halt in that area and no soil shall be exported off-site until a determination can be made regarding the provenance of the human remains; and the following procedures as set forth in CEQA Section 15064.5(e), the California Public Resources Code (Section 5097.98) and State Health and Safety Code (Section 7050.5) shall be undertaken:

A. Notification

1. Archaeological Monitor shall notify the RE or BI as appropriate, MMC, and the PI, if the Monitor is not qualified as a PI. MMC will notify the appropriate Senior Planner in the Environmental Analysis Section (EAS) of the Development Services Department to assist with the discovery notification process.

2. The PI shall notify the Medical Examiner after consultation with the RE, either in person or via telephone.

B. Isolate discovery site

1. Work shall be directed away from the location of the discovery and any nearby area reasonably suspected to overlay adjacent human remains until a determination can be made by the Medical Examiner in consultation with the PI concerning the provenance of the remains.

2. The Medical Examiner, in consultation with the PI, will determine the need for a field examination to determine the provenance.

3. If a field examination is not warranted, the Medical Examiner will determine with input from the PI, if the remains are or are most likely to be of Native American origin.

C. If Human Remains ARE determined to be Native American

1. The Medical Examiner will notify the Native American Heritage Commission (NAHC) within 24 hours. By law, ONLY the Medical Examiner can make this call.
2. NAHC will immediately identify the person or persons determined to be the Most Likely Descendent (MLD) and provide contact information.
3. The MLD will contact the PI within 24 hours or sooner after the Medical Examiner has completed coordination, to begin the consultation process in accordance with CEQA Guidelines Section 15064.5(e), the California Public Resources and Health & Safety Codes.
4. The MLD will have 48 hours to make recommendations to the property owner or representative, for the treatment or disposition with proper dignity, of the human remains and associated grave goods.
5. Disposition of Native American Human Remains will be determined between the MLD and the PI, and, if:
    a. The NAHC is unable to identify the MLD, OR the MLD failed to make a recommendation within 48 hours after being granted access to the site, OR;
    b. The landowner or authorized representative rejects the recommendation of the MLD and mediation in accordance with PRC 5097.94 (k) by the NAHC fails to provide measures acceptable to the landowner, the landowner shall reinter the human remains and items associated with Native American human remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance, THEN
    c. To protect these sites, the landowner shall do one or more of the following:
        (1) Record the site with the NAHC;
        (2) Record an open space or conservation easement; or
        (3) Record a document with the County. The document shall be titled "Notice of Reinterment of Native American Remains" and shall include a legal description of the property, the name of the property owner, and the owner's acknowledged signature, in addition to any other information required by PRC 5097.98. The document shall be indexed as a notice under the name of the owner.

V. 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 8 a.m. of the next business day.

   b. Discoveries

      All discoveries shall be processed and documented using the existing procedures detailed in Section III, *During Construction*, and Section IV, *Discovery of Human Remains*. Discovery of human remains shall always be treated as a significant discovery.

   c. Potentially Significant Discoveries

      If the PI determines that a potentially significant discovery has been made, the procedures detailed under Section III, *During Construction*, and Section IV, *Discovery of Human Remains*, shall be followed.

   d. The PI shall immediately contact MMC, or by 8 a.m. of 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 and/or weekend 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.

VI. 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 Historical Resources Guidelines (Appendix C/D) which describes the results, analysis, and conclusions of all phases of the Archaeological Monitoring Program (with appropriate graphics) to MMC for review and approval within 90 days following the completion of monitoring. It should be noted that if the PI is unable to submit the Draft Monitoring Report within the allotted 90-day timeframe resulting from delays with analysis, special study results or other complex issues, a schedule shall be submitted to MMC establishing agreed due dates and the provision for submittal of monthly status reports until this measure can be met.

      a. For significant archaeological resources encountered during monitoring, the Archaeological Data Recovery Program shall be included in the Draft Monitoring Report.

b. Recording Sites with State of California Department of Parks and Recreation

The PI shall be responsible for recording (on the appropriate State of California Department of Park and Recreation forms-DPR 523 A/B) any significant or potentially significant resources encountered during the Archaeological Monitoring Program in accordance with the City's Historical Resources Guidelines, and submittal of such forms to the South Coastal Information Center 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 Artifacts

1. The PI shall be responsible for ensuring that all cultural remains collected are cleaned and catalogued
2. The PI shall be responsible for ensuring that all artifacts are analyzed to identify function and chronology as they relate to the history of the area; that faunal material is identified as to species; and that specialty studies are completed, as appropriate.
3. The cost for curation is the responsibility of the property owner.

C. Curation of artifacts: Accession Agreement and Acceptance Verification

1. The PI shall be responsible for ensuring that all artifacts associated with the survey, testing and/or data recovery for this project are permanently curated with an appropriate institution. This shall be completed in consultation with MMC and the Native American representative, as applicable.
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.
3. When applicable to the situation, the PI shall include written verification from the Native American consultant/monitor indicating that Native American resources were treated in accordance with state law and/or applicable agreements. If the resources were reinterred, verification shall be provided to show what protective measures were taken to ensure no further disturbance occurs in accordance with Section IV, *Discovery of Human Remains*, Subsection 5.

D. Final Monitoring Report(s)

1. The PI shall submit one copy of the approved Final Monitoring Report to the RE or BI as appropriate, and one copy 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 and/or release of the Performance Bond for grading 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.

Courtney Holowach — 4/24/26

Courtney Holowach, Senior Planner
Development Services Department

Date of Final Report

Analyst: HOLOWACH

Attachments:

Figure 1: Regional Location
Figure 2: Aerial Photograph
Figure 3: Site Plan
Environmental Impact Report No. 586601/SCH No. 2017071007
Environmental Impact Report Complete Communities Program /SCH No. 2019060003

Appendices (Under Separate Cover):

Appendix A – Air Quality Study Findings
Appendix B – Preliminary Geotechnical Investigation, Infiltration Feasibility Condition Letter and Responses to City Comments
Appendix C – Phase 1 Environmental Site Assessment
Appendix D – Drainage Study
Appendix E – Priority Development Project Storm Water Quality Management Plan
Appendix F – Water Study
Appendix G – Sewer Study
Appendix H – Waste Management Plan
Appendix I – Vehicle Miles Traveled Analysis
Appendix J – Traffic Signal Warrant Analysis

IX. REFERENCES

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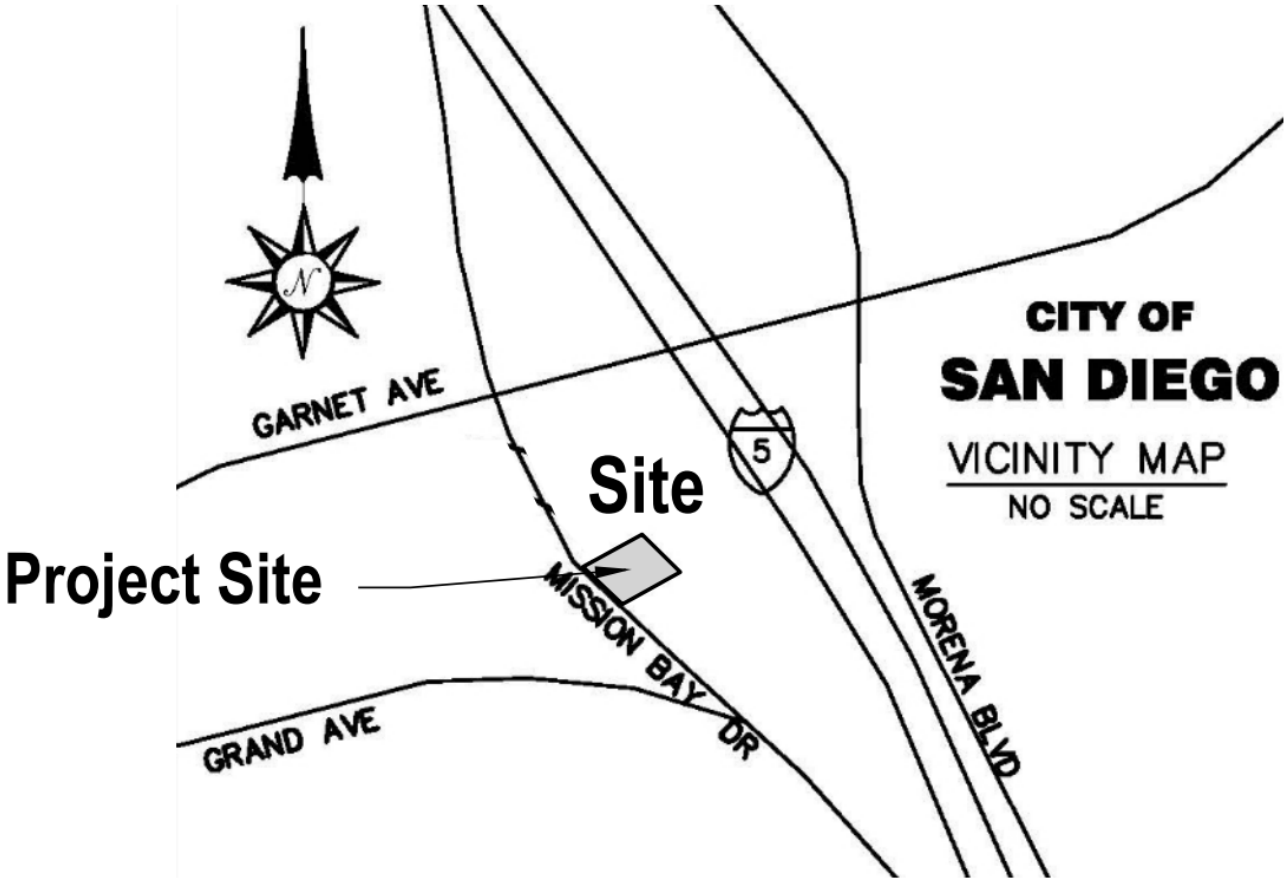
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Regional Location

4545 Mission Bay Drive / PRJ-1129794

Development Services Department

FIGURE No. 1



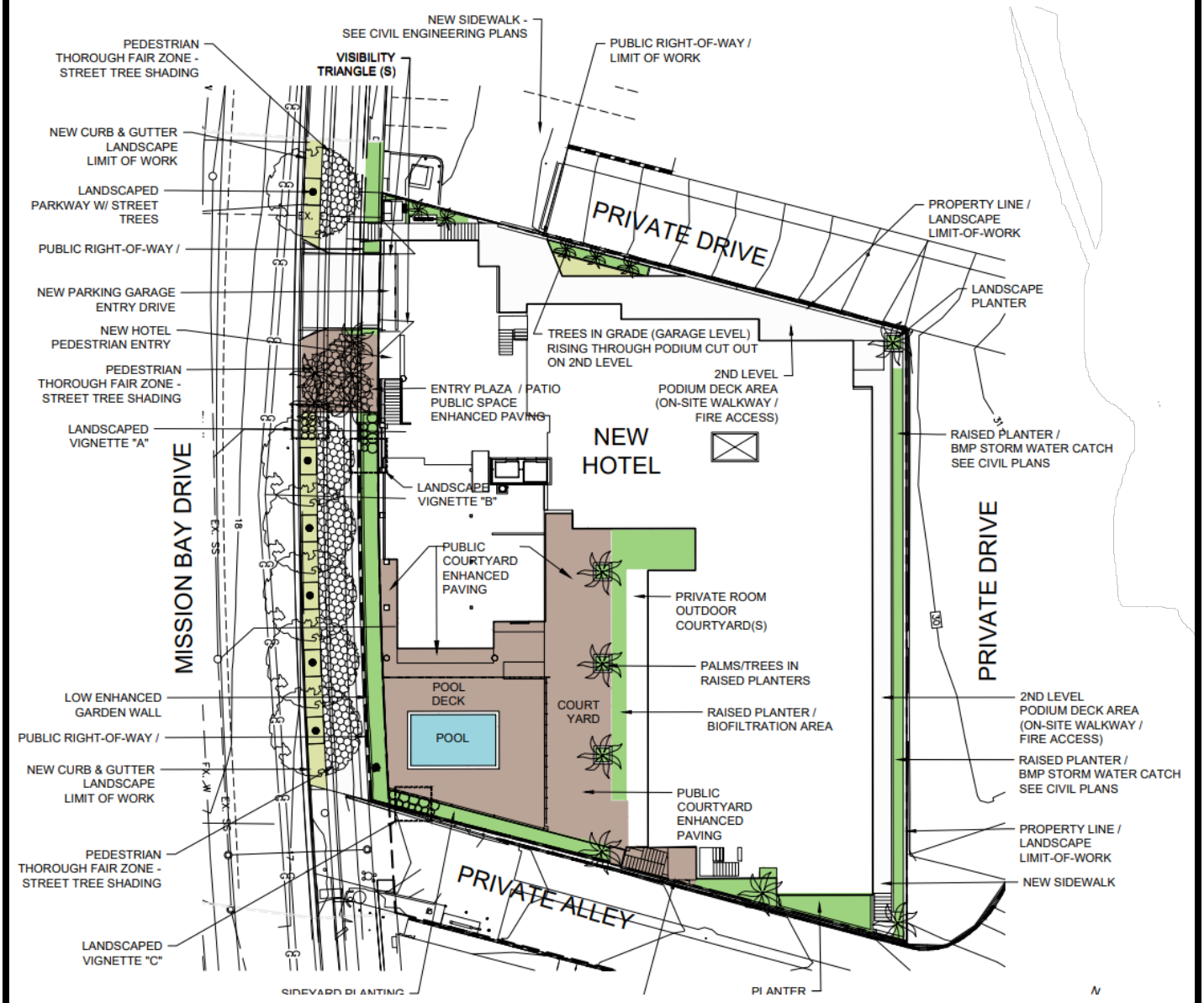
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Aerial Photograph

4545 Mission Bay Drive / PRJ-112979

Development Services Department

FIGURE No. 2



Site Plan

4545 Mission Bay Drive / PRJ-1129794

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FIGURE No. 3