THE CITY OF SAN DIEGO

# ADDENDUM

Project No. 1128026
Addendum to Blueprint Initiative PEIR
SCH No. 2021070359

SUBJECT: **4240 Morrell St**: Coastal Development Permit to allow for the demolition of an existing single dwelling unit and detached garage, and construction of 30 multi-family dwelling units in two buildings (Building A and Building B). Building A would consist of 24 units, and Building B would consist of 6 units. Of the total units, 20 units are Accessory Dwellings Units (ADUs). Eleven units are designated affordable to low- and moderate-income households, and 19 are market rate. The project includes various site improvements such as new on-site water and sewer services, sidewalk improvements, and landscaping. The project is requesting allowable waivers from development regulations related to open space requirements, setback requirements, and building envelope, as well as incentives for increased Floor Area Ratio (FAR) and structure height. The 0.28-acre project site is located at 4240 Morrell Street. It is designated RM-1-1 (1 dwelling unit per 3,000 square feet) and zoned Low-Medium Density Residential (9 – <15 dwelling units per acre) per the Pacific Beach Community Plan. The site is located within the Coastal (Non-Appealable) Overlay Zone, Transit Priority Area and Mobility Zone 2. LEGAL DESCRIPTION: Lots 17, 18, 19 and 20 in Block 282 of Pacific Beach, in the City of San Diego, County of San Diego, State of California, according to the Map thereof No. 922, filed on September 24, 1904, in the Office of the County Recorder of said County. Applicant: Playo Pacifico Properties, LLC.

## I. PREVIOUS ENVIRONMENTAL REVIEW

See the summary of the previous project below.

## II. ENVIRONMENTAL SETTING

See the summary of the environmental setting below.

## III. PROPOSED PROJECT

See the summary of the proposed project below.

## IV. DETERMINATION

The City of San Diego (City), as Lead Agency, previously prepared and certified Program Environmental Impact Report State Clearinghouse (SCH) No. 2021070359. Based on all available information considering the entire record, the analysis in this Addendum, and pursuant to the California Environmental Quality Act (CEQA) Guidelines Section 15162, Section 15164, and Section 15168 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 on the project review, none of the situations described in CEQA Guidelines Section 15162 apply. Specifically, it has been determined that the preparation of a new or subsequent environmental document is not required. Therefore, this Addendum has been prepared in accordance with CEQA Guidelines Sections 15164 and 15168. The analysis provided herein is tiered from the Blueprint San Diego Program EIR, in accordance with CEQA Guidelines Section 15152 and is incorporated by reference herein and is available at

https://www.sandiego.gov/ceqa/final. Furthermore, public review of this Addendum is not required per CEQA.

## VI. MITIGATION MONITORING AND REPORTING PROGRAM

The project shall implement the following mitigation measures:

There are no applicable mitigation measures from the Blueprint SD PEIR (SCH No. 2021070359) and no project-level mitigation that would be required to reduce the project impacts to less than significant.

## VII. CERTIFICATION

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

Courtney Holowach

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10/30/2026
Date of Final Report

Analyst: Kellogg

Figures:
- Figure 1 – Project Location
- Figure 2 – Aerial Photograph
- Figure 3 – Site Plan

Previous Environmental Document(s) and Technical Appendices (provided under separate cover):
- EIR SCH No. 2021070359
- Appendix A – Drainage Study

# CEQA GUIDELINES SECTION 15164 ADDENDUM ANALYSIS

## I. SUMMARY OF PREVIOUS PROJECT

On July 23, 2024, the City Council adopted the Blueprint SD Initiative (also known as the General Plan Refresh). The Blueprint SD Initiative included a comprehensive amendment to the General Plan to better align the City of Villages Strategy to reflect the latest goals, policies, and plans for housing, environmental protection, climate change adaptation, and sustainable growth. The Blueprint SD Initiative amended the General Plan to include an updated citywide land use framework designed around SANDAG's 2021 Regional Plan (SANDAG, 2021) to promote reductions in per capita greenhouse gas (GHG) emissions and vehicle miles traveled (VMT). It also identified complementary land use, transportation, and related policies to support future development according to the revised land use framework. The land use and policy amendments build on climate goals outlined in the City's Climate Action Plan (CAP; City 2022a) and Climate Resilient SD Plan. The Blueprint SD Initiative is a proactive effort to create an equitable and sustainable framework for growth to support current and future residents and the City's priority to develop homes near public transportation and job centers.

A Program Environmental Impact Report (PEIR) (State Clearinghouse [SCH] No. 2021070359) was prepared for the Blueprint SD Initiative, the Hillcrest Focused Plan Amendment (FPA), to the Uptown Community Plan, and the University Community Plan Update (CPU) and Local Coastal Program (LCP) Update, and was certified by the City of San Diego City Council in July 2024 (referenced hereafter as the Blueprint SD PEIR). The Blueprint SD PEIR was prepared in compliance with the California Environmental Quality Act (CEQA) Statue and Guidelines (Public Resources Code [PRC], Section 21000 et seq. and California Code of Regulations [CCR], Title 14, Section 15000, et seq.) and in accordance with the City's CEQA Significance Determination Thresholds (City, 2022b).

## II. ENVIRONMENTAL SETTING

The 0.28-acre project site (APN 424-251-1000) is located in the Low-Medium Density Residential Zone, Coastal (Non-Appealable) Overlay Zone within the Pacific Beach Community Plan Area. It is in a Transit Priority Area, Mobility Zone 2. It is bounded by Reed Avenue to the north, Morrell Street to the east, an unnamed alley to the south, and existing multi-family residential development to the west. The site is currently developed with a 1,116-square-foot single-dwelling unit and a 792-square-foot detached garage. Surrounding development consists predominantly of low-medium density single and multi-family residential uses consistent with the established neighborhood context. The project site is in geology hazard category 52 in a high paleontological sensitivity area. The nearest airport to the project area is the San Diego International Airport, approximately 4.5 miles to the south. The project area is served by existing public services and utilities.

## III. SUMMARY OF PROPOSED PROJECT

Coastal Development Permit to allow for the demolition of an existing single dwelling unit and detached garage, and construction of 30 multi-family dwelling units in two buildings (Building A and Building B). Building A would consist of 24 units, and Building B of 6 units. 20 units are Accessory Dwelling Units (ADUs). 11 units are designated affordable to low and moderate income, and 19 are market-rate. The project would also construct various site improvements, including new on-site water and sewer services, sidewalk improvements, and landscaping. Allowable waivers from development regulations are being requested pertaining to open space requirements, setback requirements, and building envelope. Allowable incentives requested include an increase in the Floor Area Ratio (FAR) and structure height.

## IV. IMPACT ANALYSIS

The following includes the project-specific environmental review pursuant to CEQA. The analysis in this document evaluates the adequacy of the Blueprint SD Initiative Program EIR relative to the project. An overview of the 4020 Morrell project impacts in relation to the previously certified Program EIR, is provided in Table 1, Impact Assessment Summary, below.

**Table 1 Impact Assessment Summary**

| Environmental Issue | PEIR Impacts | PEIR Mitigation Framework | Project Impacts | Project Mitigation |
|---|---|---|---|---|
| Aesthetics | SU | -- | LS | - |
| Air Quality | SU | MM-AQ-1<br>MM-AQ-2<br>MM-AQ-3 | LS | - |
| Biological Resources | SU | MM-BIO-1 | LS | - |
| Cultural Resources | SU | MM-HIST-1<br>MM-HIST-2 | LS | - |
| Energy | LS | -- | LS | - |
| Geology and Soils | LS | -- | LS | - |
| Greenhouse Gases | LS | -- | LS | - |
| Hazards and Hazardous Materials | LS | -- | LS | - |
| Hydrology | SU | -- | LS | - |
| Land Use and Planning | LS | -- | LS | - |
| Noise | SU | MM-NOI-1<br>MM-NOI-2 | LS | - |
| Public Services | SU | -- | LS | - |
| Recreation | SU | -- | LS | - |
| Transportation | SU | MM-TRANS-1<br>MM-TRANS-2 | LS | - |
| Tribal Cultural Resources | SU | MM-HIST-2 | LS | - |
| Utilities and Service Systems | SU | -- | LS | - |
| Water Quality | LS | -- | LS | - |
| Wildfire | SU | MM-FIRE-1<br>MM-FIRE-2 | LS | - |

LS= less than significant; SM = significant mitigated; SU = significant unmitigated

***Aesthetics***

**Blueprint SD PEIR**

Aesthetics impacts are evaluated in Section 4.1.4 of the Blueprint SD PEIR. The PEIR identified significant aesthetic impacts related to scenic vistas, scenic highways, visual character, quality of public views and scenic quality, and shade effects. While many potential impacts would be addressed through compliance with the existing regulatory and policy framework, the PEIR concluded that without site-specific plans and details regarding deviations, not all future aesthetic impacts could be reduced to less than significant at a programmatic level. As a result, aesthetic impacts were determined to be significant and unavoidable. Impacts relative to light and glare would be less than significant because future development is required to comply with the San Diego Municipal Code (SDMC), including SDMC Sections 142.0740 et seq., and 142.0730 which address light and glare in new development.

**Project**

The project is located within an urbanized area and is surrounded by similar residential development. The site has been previously developed, and no scenic vistas occur within or adjacent to the project vicinity. The site is not located along or visible from any officially designated State scenic highways; therefore, the project will not impact scenic resources. The project would be constructed within the existing development footprint and in accordance with allowable incentives and waivers. Surrounding development does not exhibit a unifying architectural theme, as the neighborhood consists of residential structures with varied architectural styles. No community identification symbol or landmark exists on the project site. The project would not open new areas to development, and implementation of the project consistent with the Blueprint SD Initiative, would not significantly alter views in the vicinity.

The most prominent light sources associated with the project would be interior lighting from the new residential units. All lighting would be compatible with existing lighting in the area. The project would be subject to the City's Outdoor Lighting Regulations (SDMC Section 142.0740), which are intended to minimize adverse effects from light pollution, including light trespass, glare, and urban sky glow. Light fixtures would be required to be directed away from adjacent properties and shielded as appropriate. Outdoor lighting would be located and designed to promote public safety and minimize unnecessary light and glare effects to the surrounding community. In addition, the project would comply with Municipal Code Section 142.0730 (Glare Regulations), which limits exterior materials based on reflectivity. No large, reflective surfaces or materials are proposed that would generate glare impacts on surrounding properties.

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

***Air Quality***

**Blueprint SD PEIR**

Air quality impacts related to conflicts with air quality plans are evaluated in Section 4.2.4 of the Blueprint SD PEIR.

The Blueprint SD PEIR concluded that implementation of the Blueprint SD Initiative would increase the density and intensity of development, resulting in more homes and jobs than assumed in adopted plans. Consequently, future emissions associated with buildout of the CPU areas exceed what is accounted for in the Regional Air Quality Standards (RAQs). Additionally, increases in land use intensities associated with the Village Climate Goal Propensity Map could also result in emissions above RAQs assumption. As a result, emissions of ozone precursors (volatile organic compounds [VOCs] and nitrous oxide [NOx]) would be greater than what is accounted for in the Regional Air Quality Standards (RAQs) and direct and cumulative impacts related to conflicts with air quality plans would be significant.

The Blueprint SD PEIR does not identify mitigation for conflicts with air quality plans because the City regularly provides updated land use, housing, and employment information to SANDAG. These updates ensure that future revision to the RAQs and State Implementation Plan (SIP) reflect anticipated changes associated with the initiative. The Blueprint SD PEIR concluded that impacts related to conflicts with air quality plans would be significant and unavoidable.

The PEIR also concluded that future development projects consistent with Blueprint SD would generate construction and operational emissions that could exceed air quality standards. Mitigation measure MM-AQ-1 requires compliance with applicable air quality regulations and mandates that discretionary projects demonstrate emissions would not exceed the City's CEQA significance thresholds. However, due to uncertainty about future project characteristics, MM-AQ-1 cannot ensure that all impacts would be reduced to less than significant. Therefore, direct and cumulative impacts related to air quality standards would be significant and unavoidable.

The Blueprint SD PEIR concluded that future residential, light industrial, or commercial development that involves stationary source emissions would not result in significant impacts with implementation of mitigation MM-AQ-1. MM-AQ-2 reinforces compliance with SDAPCD permitting requirements for stationary sources and requires discretionary projects involving substantial diesel mobile-source emissions or heavy industrial uses to prepare a health risk assessment (HRA). Although MM-AQ-2 would reduce impacts to sensitive receptors, it does not apply to ministerial projects, and, at a program level the feasibility of mitigating impacts is uncertain. Therefore, direct air quality impacts related to sensitive receptors would be significant and unavoidable.

The Blueprint SD PEIR concluded that construction-generated odors would be less than significant because future development is not anticipated to produce substantial odors or to introduce odor-generating land uses adjacent to sensitive receptors. Future projects would

be required to comply with applicable regulations for nuisance odors. However, due to limited detail on future individual projects, the PEIR determined that direct impacts associated with objectionable odors would be significant, though not cumulatively considerable. Mitigation measure MM-AQ-3 requires future discretionary projects to comply with SDAPCD Rule 51 and SDMC Section 142.0710, but ministerial projects would not undergo detailed odor evaluation. Therefore air quality impacts related to odors would be significant and unavoidable.

**Project**

The RAQS relies on information from the California Air Resources Board (CARB) and SANDAG, including mobile and area source emissions projected countywide growth to forecast future emissions and determine necessary emission-reduction strategies. CARB's mobile-source emission projections and SANDAG's growth forecasts are based on population, vehicle trends, and local land use plans developed by San Diego County and its cities. Accordingly, projects that are consistent with the growth anticipated adopted land use plans are considered consistent with the RAQS. The project is consistent with the Blueprint SD Initiative, Pacific Beach Community Plan, and the underlying zoning for residential development. Therefore, the project would be consistent at a sub-regional level with the growth forecasts in the RAQs and would not obstruct implementation of the RAQs.

Implementation of the project would generate temporary air emissions during construction from soil grading, equipment operations, worker trips, haul trips, and temporary power use. The project proposes two new three-story multi-family buildings containing 10 dwelling units and 20 accessory dwelling units, with an estimated trip generation of 180 Average Daily Trips. This level of activity is well below the criteria pollutant significance thresholds detailed in the City's CEQA Significance Thresholds.

Construction activities could temporarily increase the emissions of dust and other pollutants; however, such emissions would be temporary and short-term. Implementation of standard Best Management Practices (BMPs) would reduce potential construction-related air quality impacts to less than significant levels. Operation of a single residential unit would produce minimal stationary source emissions, and the project would not expose sensitive receptors to substantial pollutant concentrations.

Construction of the project would involve the use of diesel-powered construction equipment, and diesel exhaust odors may be noticeable at adjacent properties for short periods during construction. Additional odors may be generated from architectural coatings and paving materials; however, these activities would be temporary and are not anticipated to result in significant odor impacts. The project does not include industrial, agricultural, or other land uses that are typically associated with objectionable odors and would be required to comply with applicable regulations for nuisance odors. Therefore, project impacts associated with objectionable odors would be less than significant.

Overall, based on the foregoing analysis and information, the project is within the scope of the analysis of the Program EIR, and there is no evidence that the project would require a major change to the Program EIR. The project would not result in any new significant

impacts, nor would there be a substantial increase in the severity of impacts from that described in the Program EIR.

***Biological Resources***

**Blueprint SD PEIR**

Biological resources impacts are evaluated in Section 4.3.4 of the Blueprint SD PEIR.

The Blueprint SD PEIR identified that future site-specific development projects may impact sensitive plant and wildlife species either directly through the loss of habitat (including critical habitat) and/or direct take, or indirectly by placing development in or adjacent to sensitive habitat. Potential impacts to federal- or state-listed species, Multiple Species Conservation Plan (MSCP) Covered Species, Narrow Endemic Species, plant species with a California Native Plant Society (CNPS) Rare Plant Rank of 1 or 2, and wildlife species included on the California Department of Fish and Wildlife's (CDFW's) Special Animals List would be significant. Potential impacts to birds covered by the Migratory Bird Treaty Act (MBTA) would be avoided by adherence to the requirements of this law. However, as the Blueprint SD PEIR was a program level of review it could not ensure all impacts could be feasibly reduced to less than significant. As such, it concluded that direct and cumulative impacts to sensitive species would be significant.

Future development projects could also result in impacts to sensitive wetland communities and upland (Tier I, Tier II, Tier IIIA, and Tier IIIB) habitat that is present within the plan areas. Development is anticipated to be primarily in previously disturbed urban areas with existing commercial, industrial, residential, or employment uses; however, some project areas could support sensitive habitats. The Blueprint SD PEIR noted that all future development including ministerial and discretionary projects would be reviewed for consistency with the City's Environmentally Sensitive Land (ESL) Regulations and if any ESL is present, a discretionary Site Development Permit or Neighborhood Development Permit would be required. Discretionary permits would include an environmental analysis that demonstrates compliance with the City's ESL Regulations, Biology Guidelines, MSCP Subarea Plan (SAP), and VPHCP. Sensitive habitat in the plan areas is concentrated in the MHPA, which are conservation lands with limited potential for disturbance as regulated by the City's ESL Regulations, Biology Guidelines, MSCP SAP, and VPHCP. However, development may occur within or adjacent to the MHPA subject to a Boundary Line Adjustment or Boundary Line Correction. Additionally, development may occur within non-MHPA sensitive habitats. At a program level, the PEIR concluded that direct and cumulative impacts to sensitive habitats would be significant.

The PEIR identified significant direct biological resource impacts to wetlands. Implementation of the City's ESL Regulations, Biology Guidelines, MSCP SAP, and VPCHP would ensure impacts to wetlands would be avoided to the extent feasible, and a wetland buffer would be provided around all wetlands, as appropriate, to protect wetland functions and values. Although these requirements would reduce impacts at the project level, the PEIR determined that without project-specific plans it could not ensure that impacts would be

reduced to less than significant. Deviations from the City's ESL Regulations may be approved in limited circumstance, potentially allowing impacts that are not fully mitigated. Therefore direct and cumulative impacts to wetlands would be significant and unavoidable.

Future development is expected to occur within developed and disturbed urban areas. Migratory wildlife corridors in the Blueprint SD Initiative area are concentrated in Open Space lands within the MHPA, and no Open Space designations would be changed by Blueprint SD. Future project-level environmental review would determine potential impacts and require mitigation consistent with the City's regulatory framework. Given the urbanized location of anticipated development and existing protections, the PEIR determined that Blueprint SD would not substantially interfere with wildlife movement, MSCP-identified linkages, or wildlife nursery sites. Direct and cumulative impacts to wildlife corridors and nursery sites would therefore be less than significant

Future projects that could directly and/or indirectly impact sensitive species, sensitive habitats, wetlands, or wildlife corridors and nursery sites would be required to implement MM-BIO-1, which reinforces required compliance with the City's ESL Regulations, Biology Guidelines, and applicable federal, state, and local Habitat Conservation Plans, and requires implementation of avoidance, minimization, and mitigation measures in accordance with the City's ESL Regulations, Biology Guidelines, MSCP SAP, and VPCHP. However, at the program-level of review, the PEIR concluded that it cannot be known with certainty that all impacts could be mitigated to less than significant due to the potential for deviations that may allow for limited instances of impacts to occur that are not fully mitigated. Consequently, the Blueprint SD PEIR concluded that direct and cumulative impacts to sensitive species, sensitive habitats, wetlands, and wildlife corridors and nursery sites would be significant and unavoidable.

The PEIR concluded that future development projects authorized under the Blueprint SD Initiative would comply with applicable current and future local, state, and federal policies, guidelines, directives, and regulations, including but not limited to, the state and federal Endangered Species Act (ESA), the San Diego County MSCP, and the City's ESL Regulations, Biology Guidelines, MSCP SAP, and VPHCP. The General Plan Conservation Element was updated policies to support implementation of the City's MSCP SAP and VPHCP and included policies aimed at resource protection and preservation of the MHPA and open space. Future projects would be evaluated for consistency with these regulatory frameworks and applicable planning policies. Project-specific avoidance and mitigation requirements would be identified through subsequent environmental review. Adherence to the City's regulatory and policy frameworks would avoid future significant impacts. Therefore, the Blueprint SD PEIR determined that the Blueprint SD Initiative would not result in a conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state habitat conservation plan, either within the MSCP SAP area or in the surrounding region. The Blueprint SD PEIR concluded that direct and cumulative impacts related to conservation planning would therefore be less than significant.

**Project**

The project site has previously been graded and developed and is currently void of native vegetation and therefore has no potential for sensitive species. The project site is not located within or directly adjacent to the City's MHPA. Consistent with the City's Biology Guidelines (City, 2018), because the site been legally graded or grubbed and/or is characterized by ruderal species, is outside and not adjacent to the City's MHPA, and does not support wetlands, or Tier I, II, or III habitat, it is not expected support significant biological resources. No wildlife corridors exist on the project site. Therefore, the project would not result in impacts to sensitive habitat or wetlands, and no direct or indirect impacts from the removal, filling, or hydrological interruption of federally protected wetlands would occur, and no impacts to wildlife corridors would occur. The project is consistent with the City's Biology Guidelines and ESL Regulations, and other applicable current and future local, state, and federal policies, guidelines, directives, and regulations.

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

***Cultural Resources***

**Blueprint SD PEIR**

The Blueprint SD PEIR determined that although the SDMC provides for the regulation and protection of designated and potential historical resources (ensuring mitigation is implemented to reduce impacts to the maximum extent practicable), at a program level of review it is not possible to ensure the successful preservation of all historic built environment resources, objects, and sites within the Blueprint SD Initiative, Hillcrest FPA, and University CPU areas. While the existing federal, state, and local regulations would provide for the regulation and protection of archaeological resources, it is not possible to ensure the successful preservation of all archaeological resources. Thus, the Blueprint SD PEIR concluded that at a program level of review, potential direct and cumulative impacts to historic structures, objects or sites, and direct and cumulative impacts to archeological resources would be significant.

The Blueprint SD PEIR includes mitigation for future projects consistent with the Blueprint SD Initiative that could directly and/or indirectly affect a historic building, historic structure, or historic object as defined in the City's Historical Resources Regulations and Historical Resources Guidelines. Future discretionary projects would be required to implement MM-HIST-1, which reinforces required compliance with the City's Historical Resources Guidelines and Historical Resources Regulations (SDMC Sections 143.0201–143.0280) and requires the implementation of avoidance, minimization, and mitigation measures in accordance with the City's Historical Resources Regulations and Historical Resources Guidelines. Future projects with the potential to directly or indirectly affect a, archaeological resource would be required

to implement MM-HIST-2 prior to the issuance of any discretionary permit. MM-HIST-2 specifically outlines steps to be taken to determine (1) the potential presence and/or absence of cultural resources, and (2) the appropriate mitigation for any significant resources that may be impacted. With implementation of MM-HIST-2, future discretionary development, redevelopment, and related construction activities would require compliance with the City's Historical Resources Regulations (SDMC Section 143.0212). City review of all permit applications for any parcel identified as sensitive on the Cultural Resources Sensitivity Maps would ensure application of MM-HIST-2 when appropriate. However, the Blueprint SD PEIR determined that even with implementation of MM-HIST-1 and MM- HIST-2, the feasibility and efficacy of mitigation measures could not be determined at the program level of analysis. Thus, the Blueprint SD PEIR concluded that direct and cumulative impacts to historic resources and archaeological resources would be significant and unavoidable.

The Blueprint SD PEIR concluded that future development within areas with moderate and high cultural resource sensitivity that could disturb native soils could have the potential to encounter human remains. Future projects consistent with the Blueprint SD Initiative would be subject to compliance with the City's Historical Resources Regulations (SDMC Section 143.0212). The City implements the Historical Resources Regulations during permit review which requires the City to review Cultural Resources Sensitivity Maps to identify properties that have a likelihood of containing archaeological sites. Sites with archaeological resource potential (within identified moderate or high resource sensitivity areas) could also contain human remains.

This review is supplemented with a project-specific records search of the CHRIS data and Native American Heritage Commission (NAHC) Sacred Lands File by qualified staff, after which a site- specific archaeological survey may be required, when applicable, in accordance with the City's regulations and guidelines. Should the site have the potential for impacting human remains, measures would be required, including archaeological and Native American monitoring during ground-disturbing activities, as recommended through project-specific consultation.

Additionally, Section 7050.5 of the California Health & Safety Code (H&SC) requires that in the event human remains are discovered during construction or excavation, all activities must be stopped in the vicinity of discovered human remains until the coroner can determine whether the remains are those of a Native American. If determined to be Native American, the coroner must contact the NAHC. The California H&SC provides a process and requirements for the identification and repatriation of collections of human remains or cultural items. Specifically, H&SC Section 8010-8030, otherwise known as CalNAGPRA, ensures that Native American human remains and cultural items are treated with respect and dignity during all phases of the archaeological evaluation process.

CalNAGPRA applies the repatriation policy found in 25 United States Code Section 3001-3013, also known as NAGPRA. The act conveys to Native Americans of demonstrated lineal descent the human remains, including the funerary or religious items, that are held by federal agencies and federally supported museums, or that have been recovered from federal lands. NAGPRA makes the sale or purchase of Native American remains illegal, whether or not they were derived from federal or Native American lands.

The Blueprint SD PEIR concluded that with the implementation of local, state, and federal regulations, direct and cumulative impacts to human remains would be less than significant.

**Project**

The City of San Diego's criteria for determination of historic significance, pursuant to CEQA, are evaluated based upon age (over 45 years), location, context, association with an important event, uniqueness, or structural integrity of the building. Projects requiring the demolition and/or modification of structures that are 45 years or older have the potential to result in significant impacts to a historical resource. The existing residence was built in 1907. The project site underwent historic review on June 24, 2024. The property did not meet local designation criteria as an individually significant resource under any adopted Historical Resources Board Criteria.

The City's Historic Resource Guidelines (2024) require archaeological surveys when development is proposed on previously undeveloped parcels, when a known resource is identified on site or within a one-mile radius, when a previous survey is more than five years old if the potential for resources exists, or based on a site visit by a qualified consultant or knowledgeable City staff. The site is heavily developed and no known resources have been identified at this location. Based on the results of previous surveys and the current on-site conditions, impacts associated with buried cultural resources (such as archaeological resources or tribal cultural resources) and with human remains are not anticipated and would not occur.

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

***Energy***

**Blueprint SD PEIR**

Energy impacts are evaluated in Section 4.5.4 of the Blueprint SD PEIR. The Blueprint SD PEIR evaluated impacts to energy resources in terms of construction-related energy consumption, transportation energy use, and operational energy use. With regard to construction, energy use would occur from fuel consumption by vehicles used by workers commuting to and from the construction site, and fuel use by vehicles and other equipment to conduct construction activities. Although details of future projects that could be implemented in accordance with the Blueprint SD Initiative are not known at this time, there are no known conditions in the Blueprint SD Initiative area, including the Climate Smart Village Areas that would require non-standard equipment or construction practices that could increase fuel-energy consumption above typical rates. Therefore, the Blueprint SD PEIR concluded that construction of development facilitated by the Blueprint SD Initiative would not result in the use of excessive amounts of fuel or other forms of energy and direct and cumulative impacts

would be less than significant. The Blueprint SD PEIR determined that development facilitated by the implementation of the Blueprint SD Initiative would not conflict with any state or local plan for renewable energy or energy efficiency and concluded that direct and cumulative energy impacts related to conflicts with plans or policies would be less than significant.

**Project**

The project would be required to meet energy standards of the current California Energy code (Title 24). Project construction would include the consumption of energy related to transportation fuels for haul trucks, construction equipment and construction workers traveling to and from the project site. Electricity would be used during construction to provide power for lighting and electronic equipment, and to power certain construction equipment. Construction of the project would require the consumption of energy for necessary on-site activities as well as to transport materials to and from the site and for removal of excess fill and debris from the project site. The amount of energy used would not represent a substantial fraction of the available energy supply in terms of equipment and transportation fuels. Further, compliance with the existing anti-idling and emissions regulations would result in a more efficient use of construction-related energy and the minimization or elimination of wasteful and unnecessary consumption of energy. Construction power use would be temporary, occurring only during the construction period.

During operation of the proposed facility, the project would be required to comply with the California Building Code Energy Efficiency requirements and applicable CALGreen building standards. The project would also comply with the CAP Consistency regulations under Chapter 14, Article 3, Division 14. The project would not result in any out of the ordinary energy consumption. Compliance with existing regulations and requirements would ensure that the project would not result in the wasteful, inefficient and unnecessary consumption of energy during project operation. The project is also consistent with the General Plan and Community Plan land use designations with allowable incentives and waivers. Impacts would be less than significant.

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

***Geology and Soils***

**Blueprint SD PEIR**

Geology and soil impacts are analyzed in Section 4.6.4 of the Blueprint SD PEIR. The Blueprint SD PEIR concluded that implementation of the Blueprint SD Initiative, Hillcrest FPA, and University CPU would not have direct or indirect significant environmental impacts related to seismic hazards because future development would be required to comply with the SDMC and California Building Code (CBC). Adherence to SDMC grading regulations and

construction requirements, and implementation of recommendations contained within required site-specific geotechnical studies, would avoid significant impacts related to geologic hazards. Conformance to mandated City grading requirements would ensure that proposed grading and construction operations associated with future development pursuant to the Blueprint SD Initiative, Hillcrest FPA, and University CPU would avoid significant soil erosion impacts. Thus, the Blueprint SD PEIR concluded direct and cumulative soil erosion impacts would be less than significant. Conformance with the SDMC and CBC, as well as preparation of site-specific geotechnical reports and implementation of report recommendations, would ensure that direct and cumulative impacts related to geologic instability and specifically landslides, lateral spreading, subsidence, liquefaction, or collapsible or expansive soils would be less than significant. Compliance with SDMC Section 142.0151 would ensure paleontological monitoring is required during grading in accordance with the General Grading Guidelines for Paleontological Resources in the City's Land Development Manual. The Blueprint SD PEIR concluded that with implementation of these SDMC requirements during grading, direct and cumulative impacts to paleontological resources and unique geologic features would be less than significant.

Thus, the Blueprint SD PEIR concluded direct and cumulative impacts geology and soils would be less than significant.

**Project**

The project is located in Geologic Hazard Category Designation 52 (other level areas, gently sloping to steep terrain, favorable geologic structure, low risk). The site is not located within a local or State designated Earthquake Fault Zone and no known active or potentially active faulting was identified. The potential for ground rupture at the project site is considered low due to the absence of active faults in the project site. The site is previously developed and heavily disturbed. Any potential impacts to soil stability would be reduced by the use of standard erosion control measures during construction. The project is not located on a geologic unit that is unstable or that would become unstable. The project site is not mapped within a landslide zone, and no landslides have been identified within the site or in the immediate vicinity. Given the absence of shallow groundwater and the high density of the underlying materials, the potential for liquefaction to adversely affect the site would be negligible. According to the "Geologic Map of the San Diego 30' x 60' Quadrangle, California" (Kennedy and Tan, 2008), the project site is underlain with old paralic deposits from the late to middle Pleistocene. These deposits are assigned a high potential for fossil resources. The project would involve grading 0.17 acres of soil on the project site, cut to a maximum depth of 1.75 feet. Paleontological resources monitoring is required under San Diego Municipal Code section 142.0151 if project grading involves 1,000 cubic yards or greater, and 10 feet or greater in depth, in a high resource potential geologic deposit/formation/rock unit. The project does not meet these thresholds. The project would be required to comply with seismic requirements of the California Building Code, and utilize proper engineering design and standard construction practices.

Overall, based on the foregoing analysis and information, the project is within the scope of the analysis of the Program EIR, and there is no evidence that the project would require a major change to the Program EIR. The project would not result in any new significant impact,

nor would there be a substantial increase in the severity of impacts from beyond those described in the Program EIR.

***Greenhouse Gases***

**Blueprint SD PEIR**

Impacts related to GHGs are evaluated in Section 4.7.4 of the Blueprint SD PEIR. The Blueprint SD PEIR stated that quantification of GHG emissions is not required for the Blueprint SD Initiative, Hillcrest FPA, and University CPU based on the City's CEQA Significance Determination Thresholds (City, 2022b). Pursuant to the City Planning Department's *Revised Climate Action Plan Consistency for Plan- and Policy-Level Environmental Documents and Public Infrastructure Projects memorandum* (City, 2025a), the environmental analysis for plan and policy-level documents should address the ways in which the plan or policy is consistent with the goals and policies of the General Plan and CAP, specifically General Plan policies LU-A.9, ME-D.17, CE-J.2, and CE-J.3 and CAP Strategy 3, although all six strategies from the CAP should be discussed. The Blueprint SD PEIR determined that the Blueprint SD Initiative was consistent with these General Plan policies and the CAP. Future development under the Blueprint SD Initiative would be consistent with state plans (CARB Scoping Plan and associated regulations), SANDAG's 2021 Regional Plan, the City's General Plan, and the City's CAP. Impacts related to GHG emissions and consistency with applicable GHG emission reduction plans would be less than significant.

**Project**

The project would be consistent with the strategies and actions of the CAP to reduce citywide greenhouse gas (GHG) emissions, including landscaping requirements. The project is located within a Transit Priority Area, within Mobility Zone 2, and includes VMT reduction measures such as a bike repair station. 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.

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

***Hazards and Hazardous Materials***

**Blueprint SD PEIR**

Impacts related to hazards and hazardous materials are evaluated in Section 4.8.4 of the Blueprint PEIR. Future development and construction activities associated with individual development implemented by the Blueprint SD Initiative would be in compliance with applicable federal, state, and local regulations and would ensure that regulated hazardous materials are handled and disposed of properly. Operation of future development could use

small amounts of hazardous materials for cleaning and maintenance; however, hazardous materials and waste would be managed and used in accordance with applicable federal, state, and local laws and regulations, which would ensure that no significant hazards occur during long-term operations. The Blueprint SD PEIR concluded that direct and cumulative hazardous materials impacts would be less than significant.

Future development implemented in accordance with the Blueprint SD Initiative would be subject to applicable regulations, industry standards, and code requirements related to hazardous emissions and the handling of hazardous materials, including as they relate to proximity to schools. For new schools that could be constructed within 0.25 mile of a facility that emits hazardous emissions or handles hazardous or acutely hazardous materials, substances, or waste, the school district or private school entities would be responsible for planning, siting, building, and operating the schools. It would be the responsibility of the school district to perform an in-depth analysis of potential hazards at the project level. Additionally, pursuant to PRC Section 21151.4, an EIR shall not be certified nor shall a Negative Declaration be approved for any project involving the construction or alteration of a facility that emits hazardous emissions or handles extremely hazardous substances within a quarter mile of a school unless the lead agency has consulted with the school district having jurisdiction over the school, and the school district has been given written notification of the project at least 30 days prior to the proposed certification of the EIR or approval of the Negative Declaration. The Blueprint SD PEIR concluded that direct and cumulative impacts to schools from hazardous materials or handling hazardous or acutely hazardous materials, substances, or waste would be less than significant.

The Blueprint SD PEIR noted that there are listed hazardous materials sites within the Blueprint SD Initiative areas, some of which have an “open case” status. Some properties may need to be individually evaluated at the time of redevelopment and may need remedial measures to mitigate potential exposure to hazardous materials present at those properties. The Blueprint SD PEIR determined that any new development that involves contaminated property would necessitate the cleanup 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 of San Diego Department of Environmental Health and Quality, Hazardous Materials Division (DEHQ/HMD) or a similar determination is issued by the City’s Fire-Rescue Department (SDFD), California Department of Toxic Substances Control (DTSC), Regional Water Quality Control Board (RWQCB), or other responsible agency. Therefore, the Blueprint SD PEIR concluded that direct and cumulative impacts related to hazardous materials sites would be less than significant.

The Blueprint SD PEIR concluded that the Blueprint SD Initiative, Hillcrest FPA, and University CPU do not include any goals or objectives that would interfere with or diminish the capacity of existing programs and facilities to provide effective emergency response or allow for sufficient emergency evacuation in these areas. The Blueprint SD Initiative, Hillcrest FPA, and University CPU include policies which support effective emergency evacuation and would also improve circulation and mobility in these areas for all modes of travel, including emergency vehicles, and dedicated roadway space for transit would also be available for

emergency vehicle use. Additionally, the Blueprint SD PEIR determined that future development under the Blueprint SD Initiative would be primarily located within areas near major transportation corridors that serve as emergency evacuation routes. The Blueprint SD PEIR concluded direct and cumulative impacts related to emergency response would be less than significant.

**Project**

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 highly hazardous materials. In addition, the transport of the aforementioned materials would comply with all applicable regulations and requirements and therefore, would not create a significant hazard to public health. The project would comply with existing laws and regulations related to hazardous materials.

Mission Bay High School is the nearest school and is located approximately 0.4 miles from the project site. Thus, the project would not result in hazardous emissions, materials, substances, or waste within 0.25 miles of a school. The project is not included in the DTSC EnviroStor (CA DTSC, 2025) or the California State Water Resources Control Board (SWRCB) GeoTracker (SWRCB, 2025) databases. Pertinent information regarding emergency response in the project area vicinity is provided in the County Multi-Jurisdictional Hazard Mitigation Plan (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 site with existing major roads that provide a means for emergency evacuation. Direct access to I-5 is provided via Morrell Street and Grand Avenue. The project would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan.

Overall, based on the foregoing analysis and information, the project is within the scope of the analysis of the Program EIR, and there is no evidence that the project would require a

major change to the Program EIR. The project would not result in any new significant impact, nor would there be a substantial increase in the severity of impacts beyond those described in the Program EIR.

***Hydrology***

**Blueprint SD PEIR**

Impacts related to hydrology were evaluated in Section 4.9.4 of the Blueprint SD PEIR.

New development occurring within the Blueprint SD Initiative areas would be required to implement on-site low impact development (LID) BMPs to support infiltration, where feasible, into the design of future projects. Further, implementation of LID BMPs, where feasible, would protect the quality of groundwater resources and address the potential for transport of pollutants of concern through either detention/retention or infiltration, consistent with the requirements of the Municipal Separate Storm Sewer System (MS4) Permit issued by the San Diego RWQCB, and the City's Stormwater Standards Manual and Drainage Design Manual. The Blueprint SD PEIR determined that implementation of LID BMP design elements would ensure infiltration of stormwater runoff and reduce the amount of pollutants transported from the project areas to receiving waters.

Future projects would also be required to comply with the City's drainage and floodplain regulations in the SDMC, ESL Regulations protecting floodplains, and Federal Emergency Management Agency (FEMA) standards. Compliance with these regulations, as well as those mentioned above, would ensure development is designed to avoid drainage impacts due to erosion and siltation, surface runoff, stormwater drainage systems, and flood flows.

The Blueprint SD PEIR concluded that impacts related to pollutant release resulting from inundation within the Blueprint SD Initiative areas would be significant for areas within flood hazard zones. Future development would be required to comply with the City's Flood Mitigation Plan and the SDMC for development regulations for Special Flood Hazard Areas (SFHAs) (SDMC Sections 143.0145 and 143.0146) which would ensure flood hazards and the corresponding risk of release of pollutants due to inundation are minimized. However, the Blueprint SD PEIR concluded that due to portions of the Climate Smart Village Areas being located within the Mission Valley Community Plan area, which is designated Zone X with a Provisionally Accredited Levee (PAL) note, direct impacts associated with the Blueprint SD Initiative are considered significant due to the level of uncertainty regarding the potential flooding impact related to development behind the PAL area. Because this represents a localized condition and would not contribute to a broader cumulative flooding impact, the Blueprint SD PEIR concluded that cumulative impacts would be less than significant.

The Blueprint SD PEIR concluded that direct and cumulative impacts related to groundwater, direct and cumulative impacts related to drainage, and cumulative impacts related to inundation would be less than significant. Due to uncertainty regarding the potential flooding impact related to development behind the PAL area, direct impacts related to inundation were determined to be significant.

**Project**

The project would be serviced by the public water supply with no need for groundwater resources. The project site would be fully developed following completion of the project. While the project would increase the amount of impervious surfaces at the project site, it would not substantially alter the rate of groundwater recharge. Proper surface and subsurface drainage would be required of the project and would be reviewed and approved by the City prior to the issuance of grading permits. The project would not rely on groundwater in the area and would not significantly deplete any groundwater resources.

A project-specific Drainage Study was prepared to address site-specific drainage conditions (Appendix A). The proposed development includes improvements to a 0.3-acre site area to remove an existing structure and grade the site with building pads for the proposed residential multi-family units. The site total runoff is increased 0.35 cubic feet per second (CFS) from the existing to the proposed condition, and the flow velocity is increased 1.2 feet per second. The study concludes that this change to the runoff would not cause any negative impact to adjacent or downstream properties, nor would there be any potential for increased erosion either at the site or downstream due to the project since the flows are conveyed through a gutter system. Development of the project site and placement of new impervious surfaces would not result in a substantial increase in impervious surfaces and associated increased runoff or a substantial alteration to on- and off-site drainage patterns due to changes in runoff flow rates or volumes. The project would not significantly alter existing drainage patterns at the project site or divert runoff from existing conditions.

The project is located on a developed site surrounded by existing residential development. It would be required to comply with all City stormwater standards during and after construction. Appropriate BMPs would be implemented to ensure that water quality is not degraded; therefore, ensuring that project runoff is directed to appropriate drainage systems. Any runoff from the site is not anticipated to exceed the capacity of existing stormwater systems or provide substantial additional sources of polluted runoff. The project site is not located within a flood hazard zone, and would not significantly increase sources of pollutants.

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

***Land Use and Planning***

**Blueprint SD PEIR**

Land use and planning impacts are evaluated in Section 4.10.4 of the Blueprint SD PEIR.

The Blueprint SD PEIR determined that overall policy changes related to mobility are intended to support community accessibility and connectivity. Implementation of the land use and policy framework defined by the Blueprint SD Initiative would avoid physical division of the community.

The Blueprint SD PEIR concluded that implementation of the Blueprint SD Initiative would be consistent with the City's overarching policy and regulatory documents including the General Plan and SDMC. Additionally, updates to mobility policies would help achieve consistency with SANDAG's 2021 Regional Plan. The Blueprint SD Initiative would be consistent with applicable environmental goals, objectives, or guidelines of the SANDAG 2021 Regional Plan, the General Plan and General Plan Noise Element, ESL Regulations, California Coastal Act, the MSCP SAP, the VPHCP, CAP, Historical Resource Regulations, Airport Land Use Compatibility Plans (ALUCPs), and affordable housing regulations.

The Blueprint SD PEIR noted that as the Blueprint SD Initiative, Hillcrest FPA, and University CPU actions are planning and policy level actions, no deviations or variances are proposed. However, future development may propose deviations or variances. In accordance with the SDMC, if findings cannot be supported by the City, the deviation or variance would not be approved. Similarly, the City may approve waivers and/or incentives under the Affordable Housing Regulations and other affordable density bonus programs; however, impacts resulting from the City's Affordable Housing Regulations and other affordable housing density bonus programs have been addressed as part of the environmental review associated with the adoption of the regulations.

The Blueprint SD PEIR concluded that direct and cumulative impacts related to physical division of a community, conflicts with a land use plan, policy, or regulation, and to deviation or variance would be less than significant.

**Project**

The project is consistent with the General Plan and Pacific Beach Community Plan land use designation. The project site is located within a developed residential neighborhood and surrounded by similar development. The new residential units would not obstruct adjacent properties and the project is consistent with surrounding land uses.

The project site is designated as Low Medium Density Residential in the Pacific Beach Community Plan and is zoned RM-1-1. The project would comply with the development regulations of the RM-1-1 zone and applicable overlay zones (i.e., Coastal (Non-Appealable) Overlay Zone, Transit Priority Area, Mobility Zone 2). The project site is located within a developed residential neighborhood and surrounded by similar development. The new residential units would not obstruct adjacent properties and is consistent with surrounding land uses. Therefore, the project would not physically divide an established community.

The project site has been fully graded and previously developed, is in an urbanized area, and does not contain designated open space or prime farmland. The site does not contain environmentally sensitive lands and is, therefore, not subject to the ESL Regulations. The project would be consistent with the strategies and actions of the CAP to reduce citywide

greenhouse gas (GHG) emissions. The project is compatible with the area designated for residential development by the General Plan and Community Plan and is consistent with the existing underlying zone and surrounding land uses. Construction of the project would occur within an urbanized neighborhood with similar development. Furthermore, the project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including but not limited to the general plan community plan, or zoning ordinance) adopted for avoiding or mitigating an environmental effect.

Noise/land use compatibility impacts may result if incompatible land uses are proposed adjacent to each other. Compatibility is based on the application of the Land Use-Noise Compatibility Guidelines contained in the City's General Plan Noise Element Table NE-3. Multi-family residential uses are "compatible" with noise levels up to 45 dBA CNEL, and "conditionally compatible" up to 70 dBA CNEL. Title 24 requirements during the building permit review would require residential/habitable interior noise standards of 45 dB(A) CNEL, and non-residential interior noise standards of 50 dB(A) CNEL. In addition, Section 1207 of the CBC requires that interior noise levels attributable to exterior sources are not to exceed 45 CNEL in any habitable room. Generally, modern construction techniques can provide sufficient attenuation to reduce noise levels to meet the CBC requirement. The project would also be required to comply with construction noise levels limits in accordance with SDMC Section 59.5.0404, including implementation of site-specific noise reduction measures to meet property line noise limitations. The project is located with the Airport Influence Area for the San Diego International Airport. The project site is not located within any safety zones or noise contours associated with the airport (San Diego County Regional Airport Authority, 2025). The project design and occupancy would comply with the safety provisions of the Airport Land Use Compatibility Plan and would not result in hazard to air navigation. As such, the project would be consistent with the ALUCP for the San Diego International Airport.

As discussed in responses to Biological Resources above, the project would not conflict with the applicable provisions of MSCP SAP or the VPHCP. The project site has previously been graded and developed and is void of native vegetation or ESL. The project site is not located within or adjacent to the City's MHPA.

The project is requesting allowable waivers from development regulations that include a reduction to exterior private open space requirements, a reduction in the front setback requirements, elimination of the street side setback requirement, reduction in the rear setback requirement, reduction of the side setback requirement, and elimination of the angled building envelope plane and maximum structure height of 30 feet. Allowable incentives requested include increased Floor Area Ratio (FAR) and structure height.

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

***Noise***

**Blueprint SD PEIR**

Noise impacts are evaluated in Section 4.11.4 of the Blueprint SD PEIR.

Construction activities related to implementation of the Blueprint SD Initiative would potentially generate short-term noise levels in excess of 75 dB(A) Leq at adjacent properties, which would exceed the maximum level permitted by SDMC Section 59.5.0404. While the City regulates noise associated with construction equipment and activities through enforcement of its Noise Abatement and Control Ordinance, it is possible that some construction activities could exceed 75 dB(A) Leq in the vicinity of sensitive receptors. Without site-specific development details, such as the extent of construction activities, the construction equipment being utilized, and the distance to sensitive receptors, the Blueprint SD PEIR determined it cannot be ensured, at the program level, that all construction noise would be reduced to a level below significance. Mitigation measure MM-NOI-1 requires future discretionary development projects to comply with the construction noise level limits defined by SDMC Section 59.5.0404 and requires an applicable permit from the Noise Abatement and Control Administrator should the project exceed these limits. However, even with implementation of MM-NOI-1, significant construction noise impacts may still occur because it may not be possible to reduce property line construction noise level limits consistent with the SDMC at all times and a permit from the Noise Abatement and Control Administrator may be required, which allows a project to temporarily exceed standards. Thus, the Blueprint SD PEIR concluded that direct and cumulative impacts related to construction noise would be significant and unavoidable.

The Blueprint SD Initiative area would contain residential and commercial interfaces, and other land use interfaces may be present including residential near industrial uses. Mixed-use areas where residential uses are located in proximity to commercial sites could expose sensitive receptors to noise above allowable levels. While it is not anticipated that stationary sources associated with multi-family residential land uses would result in noise exceeding property line limits, at a program level of review, and without site- specific development details, the Blueprint SD PEIR determined it cannot be ensured that all development would be able to meet property line noise limitations. The City's Noise Ordinance property line standards would apply to future ministerial and discretionary development consistent with the Blueprint SD Initiative. MM-NOI-1 would also apply, however, at a program level of review, it cannot be ensured that all future development can demonstrate compliance. Thus, the Blueprint SD PEIR concluded that direct and cumulative impacts related to non-transportation noise sources would be significant and unavoidable.

Future development within the Blueprint SD Initiative areas could result in increases in transportation noise and could have the potential to increase the exposure of sensitive land uses to traffic noise. Implementation of the Blueprint SD Initiative would introduce a greater intensity of mixed-use and multi-family development that would generate traffic that would add to existing traffic noise levels. While the Blueprint SD PEIR concluded that at a program level of review impacts are considered significant, the Blueprint SD Initiative is intended to support a shift from vehicle traffic toward transit, pedestrian, and bicycle. With City

implementation of the land use and policy framework of the CAP, the Blueprint SD Initiative would support non-vehicular modes, which would support reductions in traffic noise over time. However, the Blueprint SD PEIR concluded that at a program level of review, no feasible mitigation is available to reduce impacts and thus, direct and cumulative impacts would be significant and unavoidable.

The Blueprint SD PEIR concluded that potential groundborne vibration impacts related to railroad and stationary sources would be less than significant; however, implementation of the Blueprint SD Initiative would have the potential to result in groundborne vibration impacts related to construction if pile driving is proposed within close proximity of structures. Such future projects would be required to implement MM-NOI-2, which would require the implementation of vibration reduction measures to minimize construction-related vibration impacts. However, even with implementation of MM-NOI-2, significant construction vibration-related impacts may still occur because the project-specific construction techniques, locations of construction activities, and location of vibration sensitive land uses are not known at this time. Therefore, the Blueprint SD PEIR concluded that direct and cumulative construction-related vibration impacts would be significant and unavoidable.

**Project**

Multi-family residential uses are “compatible” with noise levels up to 45 dBA CNEL, and “conditionally compatible” up to 70 dBA CNEL. Title 24 requirements during the building permit review would require residential/habitable interior noise standards of 45 dB(A) CNEL, and non-residential interior noise standards of 50 dB(A) CNEL. In addition, Section 1207 of the CBC requires that interior noise levels attributable to exterior sources are not to exceed 45 CNEL in any habitable room. Construction associated with the project would include demolition of the existing structures; site preparation work; excavation of soil; foundation work; and building construction. Generally, modern construction techniques can provide sufficient attenuation to reduce noise levels to meet the CBC requirement. The project would also be required to comply with construction noise levels limits in accordance with SDMC Section 59.5.0404, including implementation of site-specific noise reduction measures to meet property line noise limitations. The project is located with the Airport Influence Area for the San Diego International Airport. The project site is not located within any safety zones or noise contours associated with the airport (San Diego County Regional Airport Authority, 2025).

The project features a residential use that would produce new stationary noise sources, such as heating/ventilation/air conditioning (HVAC) units in the project area. In the long-term, typical noise levels associated with residential uses are anticipated. Residential uses are not associated with noise generation, and the project would not result in a substantial increase in the existing ambient noise level. City policies and regulations would control these noise sources and reduce potential impacts between the project and the nearby land uses.

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 180 Average Daily Trips). 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.

Construction activities associated with the project would have the potential to generate construction vibration. The project would not require pile driving to construct the proposed structure. In addition, the proposed project does not include components that would generate vibration during long-term operation. Impacts associated with vibration would be less than significant.

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

***Public Services***

**Blueprint SD PEIR**

Public services impacts are evaluated in Section 4.12.4 of the Blueprint SD PEIR. The Blueprint SD PEIR concluded that implementation of the Blueprint SD Initiative could result in the need for additional fire-rescue, police, school, and library facilities. As the location and need for potential future facilities could not be determined at the program level of review, the Blueprint SD PEIR determined it was unknown what specific impacts, and the extent of the impacts could occur associated with the future construction and operation of such facilities. Future public services facilities projects would require a separate environmental review and compliance with regulations in existence at the time would reduce potential environmental impacts related to the construction and operation of these public services facilities. However, as it could not be ensured that all impacts associated with the construction and operation of potential future public services facilities would be mitigated to less than significant, the Blueprint SD PEIR concluded direct and cumulative impacts would be significant. The Blueprint SD PEIR concluded that at a program level of review, no feasible mitigation is available to reduce impacts and thus, direct and cumulative impacts would be significant and unavoidable.

**Project**

The project is consistent with the planned residential land use designation of the site pursuant to the Pacific Beach Community Plan. According to the City's Thresholds, a project should be referred to the Police and/or Fire-Rescue Departments if the project exceeds the threshold of 75 dwelling units or 100,000 square feet of non-residential construction. The project does not meet this threshold. The proposed project would increase demand for services through the intensification of onsite uses but would implement the planned land use for the property, consistent with the General Plan and Pacific Beach Community Plan. The project site is located in an urbanized and developed area where public school and library services are available. The project could result in incremental demand for school

facilities. The project is consistent with the planned land uses for the project site, the development of which was included in population and growth projections analyzed in the Blueprint SD PEIR, and would be required to pay mitigation fees to the applicable school district to offset any impacts, consistent with the requirements of Senate Bill 50. New development would be subject to payment of DIF to offset demands for any new library facilities proposed in the community.

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

***Recreation***

**Blueprint SD PEIR**

Recreation impacts are evaluated in Section 4.13.4 of the Blueprint PEIR. The Blueprint SD PEIR determined that implementation of the Blueprint SD Initiative would result in an increase in the use of existing neighborhood and regional parks and other recreational facilities which would result in the deterioration of these facilities. The Blueprint SD Initiative includes a land use and policy framework that supports the maintenance and provision of new recreational facilities and incorporates policy documents such as the Parks Master Plan (City, 2021) to guide the development, expansion, and enhancement of new and existing recreational facilities. The Blueprint SD PEIR noted that future CPUs, Specific Plans, and FPAs that are implemented in accordance with the Blueprint SD Initiative could identify potential recreational opportunities and provide regulations and policies which support and facilitate the development, expansion, and enhancement of park and recreational facilities. While the development of future site-specific recreational amenities could offset the potential increased use of existing recreational facilities, the Blueprint SD PEIR determined it is unknown where these future improvements would be located, the specific impacts and the extent of impacts that could result from providing these facilities, and to what extent these future facilities would be able to accommodate increases in demand for recreational facilities. Thus, the Blueprint SD PEIR concluded that because it could not be ensured that all future impacts would be mitigated to a less than significant level, direct and cumulative impacts would be significant and unavoidable. No feasible mitigation measures were identified in the Blueprint SD PEIR.

The Blueprint SD PEIR concluded that implementation of the Blueprint SD Initiative could require the construction and/or expansion of parks and recreational facilities. While compliance with the regulations in existence at that time future individual projects are proposed would address potential environmental impacts related to the construction and operation of future park and recreational facilities, the Blueprint SD PEIR determined it is unknown where specific future developments would be located and what the specific environmental impacts and extent of impacts may be associated with providing these facilities. The Blueprint SD PEIR concluded that as it cannot be ensured that all impacts associated with the construction and operation of potential future parks and recreational

facilities would be mitigated to less than significant, direct and cumulative impacts would be significant and unavoidable. No feasible mitigation measures were identified in the Blueprint SD PEIR.

**Project**

The project would increase demand for park facilities through the intensification of onsite uses. The project is consistent with the planned residential land use designation of the site pursuant to the Pacific Beach Community Plan. New development is subject to payment of a Development Impact Fee to offset demands for any new parks proposed in the community. The project does not include recreational facilities or require the construction or expansion of recreational facilities.

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

***Transportation***

**Blueprint SD PEIR**

Transportation impacts are evaluated in Section 4.14.4 of the Blueprint SD PEIR.

The Blueprint SD PEIR concluded the Blueprint SD Initiative would support improved pedestrian, bicycle, and transit facilities and foster increased safety for alternative transportation modes by facilitating higher density development within areas closer to existing and planned transit. Additionally, the Blueprint SD PEIR noted that the Blueprint SD Initiative provides policies that support improvements to pedestrian, bicycle, transit, and roadway facilities while reducing per capita VMT and increasing alternative mode share. Thus, the Blueprint SD PEIR concluded the Blueprint SD Initiative would not conflict with an adopted program, plan, ordinance, or policy addressing the transportation system, including transit, roadways, bicycle and pedestrian facilities, and direct and cumulative impacts would be less than significant.

The Blueprint SD PEIR concluded that the Blueprint SD Initiative would have a significant VMT impact at the program level due to residential, employment, and retail VMT exceeding 85 percent of the Base Year regional means. Although the model results show that VMT per capita (residents) and VMT per Employee (employment) for the Blueprint SD Initiative would fall below the City's significance thresholds, these model results assume full implementation of the SANDAG 2021 Regional Plan transportation investments. Overall, completion of all the SANDAG 2021 Regional Plan transportation investments cannot be ensured, and future project-specific review is required in accordance with the City's Transportation Study Manual (TSM), at a program level of review.

Mitigation measure MM-TRANS-1 reinforces required compliance with the City's Mobility Choices Ordinance (SDMC Section 143.1103 et seq.) and the City's TSM for future discretionary projects, including preparation of a VMT analysis and local mobility analysis, where applicable. MMTRANS-2 requires future community plan updates to demonstrate that future residential and nonresidential VMT levels are below the City's CEQA Significance Determination Thresholds on a citywide basis, with the full implementation of the SANDAG 2021 Regional Plan. The Blueprint SD PEIR concluded that VMT impacts would be significant even after implementation MM-TRANS-1 and MM-TRANS-2 because (1) it cannot be determined with certainty whether all future site-specific project level impacts could be reduced to below a level of significance, and (2) it cannot be guaranteed that completion of all the SANDAG 2021 Regional Plan transportation investments will occur. Therefore, the Blueprint SD PEIR concluded that impacts associated with residential, employment, and retail VMT would be significant and unavoidable.

Proposed improvements to roadways or amenities would undergo review and approval by the City Engineer and would be subject to compliance with applicable City standards, including the City's Street Design Manual. As a result, the Blueprint SD PEIR determined that a substantial increase in hazards or incompatible uses would not occur from implementation of the Blueprint SD Initiative. The Blueprint SD PEIR concluded direct and cumulative impacts regarding design features would be less than significant.

Throughout the City and beyond, there are generally adequate emergency evacuation routes through the major interstate system, local highways, and prime arterials. The Blueprint SD PEIR determined that implementation of specific policies and roadway improvements within the Blueprint SD Initiative areas would have the potential to reduce traffic congestion and improve circulation efficiency thereby improving emergency access. Future development in accordance with the Blueprint SD Initiative would be required to comply with applicable City codes related to emergency access, including the City's Fire Code and the SDMC, reviewed for consistency with policies related to emergency access, and forwarded to the City Fire Marshall to ensure adequate emergency access. Through implementation of project-specific requirements for roadway improvements consistent with the Fire Code, TSM, and the SDMC, and adherence to City policies and regulations, the Blueprint SD PEIR concluded that direct and cumulative impacts associated with emergency access would be less than significant.

**Project**

The project would be consistent with City transportation policies related to VMT. The project would not conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account of all modes transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit. In addition, the project would not require the redesign of streets, traffic signals, stop signs, striping or any other changes to the existing roadways or existing public transportation routes or types are necessary. The project is required to comply with the City's CAP Consistency regulations under Chapter 14, Article 3, Division 14.

The project would be expected to generate approximately 180 average daily trips (ADT) with 14 AM (3 in, 11 out) peak-hour weekday trips and 16 PM (11 in, 5 out) peak-hour weekday trips. This is at a rate of 6 trips/dwelling unit for Multiple Dwelling Units (Over 20 dwelling units/acre) for the 30 dwelling units per the City of San Diego Trip Generation Manual (May 2003). Since the project's expected ADT is under 1,000 ADT, and is consistent with the Community Plan/Zoning Designation, the project does not meet any of the VMT screening criteria specified in the City's TSM and is screened out of preparing a Local Mobility Analysis.

There are no design features proposed that could increase hazards in the vicinity of the project site. The project does not include sharp curves, dangerous intersections, and would not introduce incompatible uses to the project site. The project includes pedestrian improvements including removal of an existing contiguous sidewalk and replacement with a non-contiguous sidewalk along the project's frontage on Morrell Street, and the project has been reviewed by City Engineering for compliance with City standards, including the City's Street Design Manual. The project complies with applicable City codes related to emergency access, including the City's Fire Code and the SDMC, and was reviewed for consistency with policies related to emergency access, and forwarded to the City Fire Marshall to ensure adequate emergency access.

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

***Tribal Cultural Resources***

**Blueprint SD PEIR**

Impacts to tribal cultural resources are evaluated in Section 4.15.4 of the Blueprint SD PEIR.

The Blueprint SD PEIR concluded that while compliance with existing regulations including the City's Historical Resources Regulations, Historical Resources Guidelines, and tribal consultation requirements, and implementation of applicable General Plan and Community Plan policies would provide for the protection of tribal cultural resources and would minimize potential impacts, it is not possible to ensure the successful preservation of all tribal cultural resources at a program level of review. Pursuant to SDMC Section 143.0260, a potential deviation from the City's Historical Resources Regulations may be considered if a proposed development cannot to the maximum extent feasible comply with the regulations so long as the decision maker makes the applicable findings in SDMC Section 126.0505. Given the potential that future development could request deviations under the Historical Resources Regulations, the Blueprint SD PEIR determined it cannot be ensured that all impacts to tribal cultural resources would be avoided or minimized and concluded direct and cumulative impacts would be significant.

In an effort to determine the potential for Tribal Cultural Resources to be impacted as a result of project implementation, Native American Tribes were engaged. Tribal consultation

in accordance with SB 18 was initiated by the City in July 2021 for both the Blueprint SD Initiative (including the Hillcrest FPA) and the University CPU. The City received responses from three Tribes. On July 23, 2021, Ray Teran from the Viejas Band of Kumeyaay Indians provided comments on the project. The City of San Diego responded to the correspondence from the Viejas Band of Kumeyaay Indians on July 26, 2021. On August 13, 2021, Dennen Pelton from the Rincon Band of Luiseno Indians provided a response to the notice identifying the project as being outside of the Band's specific Area of Historic Interest. On April 10, 2024, Daniel Tsosie, the cultural resource manager from the Campo Band of Mission Indians requested consultation under SB 18 for the Blueprint SD Initiative. A consultation meeting was scheduled with Mr. Tsosie on April 23, 2024, but was cancelled by the Tribal representative. The consultation meeting was rescheduled to May 1, 2024, in which Mr. Tsosie began consultation with City staff regarding the Cultural Resources Sensitivity Maps and associated mitigation measure. Consultation with Mr. Tsosie was concluded on May 15, 2024, and the City made note of the recommendations.

On November 3, 2023, the City delivered AB 52 notifications for the Blueprint SD Initiative, including the Hillcrest FPA and the University CPU, to the Iipay Nation of Santa Ysabel, the Jamul Indian Village, the San Pasqual Band of Diegueno Mission Indians, and the Campo Band of Diegueno Mission Indians. Subsequent emails were delivered on November 17, 2023, November 20, 2023, and January 26, 2024. No responses were received from three of the Tribes. One request for consultation was received from Ms. Angelina Gutierrez from the San Pasqual Tribe of Mission Indians on November 6, 2023. The City responded to this request and contacted Ms. Gutierrez seeking to schedule a meeting on November 13, 2023, and December 7, 2023 to attempt to schedule an AB 52 consultation meeting, but did not receive a response.

The Blueprint SD PEIR includes mitigation that requires all discretionary development projects consistent with the Blueprint SD Initiative to implement Blueprint SD PEIR MM-HIST-2, which includes measures to minimize impacts to tribal cultural resources. This mitigation, combined with General Plan and applicable community plan policies promoting the protection of tribal cultural resources, compliance with CEQA and PRC Section 21080.3.1 requiring the opportunity for tribal consultation and the City's Historical Resources Regulations, which require review of all development projects which have the potential to impact historical resources, would reduce the program-level impact related to tribal cultural resources. However, the Blueprint SD PEIR concluded that at the program level without project-specific development plans and the potential for deviations to be allowed, it cannot be ensured that all potential impacts to tribal cultural resources would be fully avoided or minimized. Direct and cumulative impacts would be significant and unavoidable.

**Project**

The project is located in a Low Sensitivity area based on the cultural resources sensitivity map in the Blueprint SD Initiative. Low Sensitivity areas indicate where there is a high level of disturbance or development, and few or no previously recorded cultural resources are present, based on records search results and whether development of the project site occurred after 1984, when CEQA requirements would have applied. Within these areas, the potential for additional resources to be identified is low. No known archaeological sites are

mapped within the project site, and the site has also been heavily disturbed. No additional archaeological evaluation is recommended based on the project location, site photographs, scope of work, and previously disturbed nature of the site.

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

***Utilities and Service Systems***

**Blueprint SD PEIR**

Utilities and service systems were analyzed in Section 4.16.4 of the Blueprint SD PEIR. The Blueprint SD PEIR concluded that mandatory compliance with City standards and programs for the design, construction, and operation of stormwater, water distribution, wastewater, electric power, natural gas, and communications systems infrastructure would likely minimize significant environmental impacts associated with the future construction of and/or improvements to utility infrastructure. At a project level of review, future site-specific development would consider the physical impacts of utility improvements and physical impacts would be minimized through required compliance with the City's ESL Regulations, Biological Regulations, Historical Resources Regulations, Historical Resources Guidelines, tribal consultation requirements, and other applicable LDC requirements, as well as additional project-specific mitigation measures. However, the Blueprint SD PEIR concluded at the program level of review and without project-specific development plans, direct and cumulative impacts associated with the construction of stormwater, water distribution, wastewater, electric power, natural gas, and communication systems would be significant. No feasible mitigation measures were identified in the Blueprint SD PEIR as the specific impacts and extent of impacts from future site-specific projects are unknown. Direct and cumulative impacts would be significant and unavoidable.

The Blueprint SD Initiative plans for anticipated growth with a focus on increasing development densities and intensities within the Climate Smart Village Areas and prioritizing higher density multi-family and mixed-use development which is more water efficient than single family land uses. At the time specific land use changes are proposed, Water Supply Assessments (WSAs) would be prepared to evaluate and document the availability of water supply over the planning horizon. The Blueprint SD PEIR determined that providing WSA projections based on build-out assumptions for the Blueprint SD Initiative would be speculative as the land use changes have not occurred and water demand assumptions are based on more refined analysis of actual growth projections. The water use assumptions for Hillcrest FPA and University CPU included in the Blueprint SD PEIR were based on annual growth assumptions to provide a reasonable estimate of actual water demand. The Blueprint SD PEIR noted that according to WSAs prepared for the University CPU and Hillcrest FPA, there would be adequate water supply in a normal, single-dry year, and multiple-dry year (20-year) period, to meet the estimated water demands within these communities through 2045, the water supply planning horizon. Therefore, the Blueprint SD

PEIR concluded that direct and cumulative water supply impacts would be less than significant.

The Blueprint SD PEIR stated that no new sewer collection or wastewater treatment facilities are proposed in conjunction with the Blueprint SD Initiative, Hillcrest FPA, or University CPU; however, their implementation would allow for increased intensity of development that could increase demand on public sewer systems. The Blueprint SD PEIR concluded that because site-specific information regarding future demand and available wastewater capacity to serve anticipated future development is not known at a program level of review, Mandatory compliance with the SDMC regulations, the City's Sewer Design Guidelines, and PUD's Capital Improvement Program Guidelines and Standards would ensure future development is required to demonstrate adequate wastewater facilities and capacity is available, or that appropriate infrastructure improvements are constructed concurrent with future development projects to ensure adequate capacity. At a project level of review, potential physical impacts associated with site-specific designs would be avoided or minimized through required compliance with the City's ESL Regulations, Biology Guidelines, Historical Resources Regulations, and other applicable LDC requirements, as well as any additional project-specific mitigation measures. However, the Blueprint SD PEIR concluded that at the program level of review and without project-specific development plans, potential direct and cumulative impacts associated with increased demand on sewer infrastructure and wastewater capacity would be significant. No feasible mitigation measures were identified as the specific impacts and extent of impacts from future site-specific projects are unknown. Direct and cumulative impacts would be significant and unavoidable.

Future development within the Blueprint SD Initiative areas 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, the Blueprint SD PEIR concluded direct and cumulative impacts associated with solid waste would be less than significant.

**Project**

The project site is located in an urbanized area with existing development and has previously been developed with a building. The project is not anticipated to generate a significant amount of wastewater or stormwater. Although the new residential units would increase demand for water as compared to the existing single-family residence, building code regulations would ensure water-efficient fixtures are installed and that the project's overall demand for water is minimized. Water and wastewater services are already provided in the area, and the project would construct the necessary infrastructure improvements as part of the project approval process. These improvements are part of the project and are included in the environmental impact analysis presented in this document. The project would connect to existing electrical, natural gas, and telecommunications utilities that already serve the project area. The project would not require new or major expansion of infrastructure serving the area. Thus, there would be no potential for significant

environmental impacts associated with the construction of and/or improvements to utility infrastructure beyond those already identified as part of project development. The project would maintain or improve the existing system in adherence with water, sewer, stormwater, and utility regulations and conformance with the SDMC and General Plan.

Under Senate Bill 610 and California Water Code Section 10910, a formal Water Supply Assessment is required for development projects that would exceed 500 dwelling units for residential development; commercial uses over 500,000 SF or employing more than 1,000 people; industrial or manufacturing uses exceeding 650,000 SF, 40 acres, or 1,000 employees; or projects that would exceed the amount of water equivalent to, or greater than, the amount of water required by 500 dwelling units. The project would incorporate water efficiency measures as required by the CBC, CalGreen, and the City's CAP. Based on the size of the project and the incorporation of water efficiency measures, the project is not expected to result in significant impacts associated with water supply.

Based on the City's Significance Determination Thresholds, 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). This project is expected to demolish an existing single-family home, and construct two new three-story multi-family buildings totaling 15,625 square feet of Gross Floor Area. Thus, a Waste Management Plan is not required. 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.

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

***Water Quality***

**Blueprint SD PEIR**

Water quality impacts are evaluated in Section 4.17.4 of the Blueprint SD PEIR. Future development that may occur due to implementation of the Blueprint SD Initiative would have the potential to result in urban runoff and associated pollutant discharges. The Blueprint SD PEIR noted that new development would be required to implement LID BMPs into the design of future projects to address the potential for the 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 Stormwater Standards Manual. Implementation of LID BMPs and stormwater construction BMPs would reduce the amount of pollutants transported from the project sites to receiving waters. The PEIR also noted that future development projects would be subject to existing stormwater regulations in place at the time projects are implemented.

Future development in the Blueprint SD Initiative area would also be required to comply with applicable Water Quality Improvement Plans (WQIPs) and the Water Quality Control Plan for the San Diego Basin which includes the groundwater management plan and BMPs to be implemented at the project level. Additionally, the Blueprint SD PEIR noted that all development in the City is subject to the drainage regulations contained in the SDMC Chapter 14, Article 2, Division 2, Stormwater Runoff and Drainage Regulations, which require that all development be conducted to prevent erosion and stop sediment and pollutants from leaving the property to the maximum extent practicable.

Thus, through compliance with the existing regulatory framework and with applicable plans, the Blueprint SD PEIR that concluded direct and cumulative water quality impacts would be less than significant.

**Project**

The project is located on a developed site surrounded by existing residential development. It would be required to comply with all City stormwater standards during and after construction. Appropriate BMPs would be implemented to ensure that water quality is not degraded; therefore, ensuring that project runoff is directed to appropriate drainage systems. Any runoff from the site is not anticipated to exceed the capacity of existing stormwater systems or provide substantial additional sources of polluted runoff. The project site is not located within a flood hazard zone, and does not significantly increase sources of pollutants. The project would be conditioned to comply with the City's Stormwater 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 design has been reviewed by the City's engineering staff and would be conditioned to follow building construction guidelines to avoid flooding.

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

***Wildfire***

**Blueprint SD PEIR**

Wildfire impacts are evaluated in Section 4.18.4 of the Blueprint SD PEIR. The Blueprint SD Initiative is a planning level action that anticipates both future development and future planning level actions that may result in an increase in development densities and intensities including the number of residents located within areas having wildfire risk. 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 thus the Blueprint SD PEIR concluded that direct and cumulative impacts would be significant.

The Blueprint SD PEIR includes mitigation measures at the program level to serve as the basis for more specific refinement of future mitigation measures to be developed as specific projects are proposed. MM-FIRE-1 requires the City to evaluate future CPUs or other plan amendments proposed consistent with the Blueprint SD Initiative and the Village Climate Goal Propensity Map for the adequacy of evacuation routes, emergency access and fire safety in light of the proposed land use and mobility network. Future discretionary projects would be required to implement MM-FIRE-2 which reinforces required compliance with the City's applicable regulatory and policy framework such as the Fire Code, Building Regulations, Brush Management Regulations and Landscape Standards, as well as consistency with the California Office of the Attorney General issued guidance outlining best practices for analyzing and mitigating wildfire impacts of development projects under CEQA for projects with a higher level of wildfire or evacuation risk, as determined by the City. However, at a program level of review and without community-specific evaluation and project-specific details available for site-specific evaluation, the Blueprint SD PEIR concluded direct and cumulative impacts would be significant and unavoidable.

The Blueprint SD PEIR concluded that buildout of the Blueprint SD Initiative would result in higher intensity development opportunities for jobs and homes within the City, primarily located within Climate Smart Village areas and along transportation corridors. Subsequent growth would be focused within existing urban areas with an established transportation network where there is a greater likelihood that alternative modes of transportation such as walking/rolling, biking, and transit use would be encouraged. Throughout the City and beyond, there are generally adequate emergency evacuation routes through the major interstate system, local highways, and prime arterials within San Diego County. As growth occurs, the City would continue to implement its Emergency Operations Plan, SDPD Policy and Procedures, Operational Area Emergency Plan, and the California Master Mutual Aid Agreement to address emergency evacuation. Further, the Blueprint SD PEIR determined that future development implemented in accordance with the Blueprint SD Initiative would be subject to compliance with the City's Fire Code. Thus, the Blueprint SD PEIR concluded direct and cumulative impacts related to emergency evacuation would be less than significant.

Future development would also be required to comply with the City's Fire Code, Building Regulations, and Brush Management Regulations to ensure that wildfire risks are not exacerbated. While it is not anticipated that future development would exacerbate wildfire risk, residents may be exposed to pollutant concentrations associated with wildfire and/or the uncontrolled spread of a wildfire. The Blueprint SD PEIR determined that in the absence of project-specific information to evaluate site conditions such as slope and prevailing winds, it is not possible to conclude that future development and actions anticipated under the Blueprint SD Initiative would not exacerbate wildfire risks.

Future plan amendments in the Clairemont CPU area that are proposed consistent with the Blueprint SD Initiative and the Village Climate Goal Propensity Map would be required to implement Blueprint SD PEIR MM-FIRE-1 which requires an evaluation of the adequacy of evacuation routes, emergency access, and fire safety in light of the proposed land use and mobility network. The Blueprint SD PEIR also includes mitigation measure MM-FIRE-2 that would apply to discretionary projects and would reinforce required compliance with the

City's applicable regulatory and policy framework such as the Fire Code, Building Regulations, Brush Management Regulations, and Landscape Standards, as well as consistency with the California Office of the Attorney General issued guidance outlining best practices for analyzing and mitigating wildfire impacts of development projects under CEQA for projects with a higher level of wildfire or evacuation risk, as determined by the City. However, at a program level of review and without community-specific evaluation and project-specific details available for site-specific evaluation, the Blueprint SD PEIR concluded direct and cumulative impacts would be significant and unavoidable.

There are some areas within the Blueprint SD Initiative area that may have existing infrastructure deficiencies and may require capacity improvements to serve future projects implemented under the Blueprint SD Initiative. Given that future specific development projects are unknown at this time, physical impacts associated with installation of and/or improvements to utilities infrastructure would be significant. Future utility and infrastructure improvements would be required to comply with applicable City standards and thus, these improvements are not likely to exacerbate fire risk. However, the Blueprint SD PEIR concluded at the program level of review, potential temporary or ongoing direct and cumulative impacts to the environment due to the installation or maintenance of infrastructure would be significant.

The Blueprint SD PEIR includes mitigation (MM-FIRE-2) for future discretionary projects that would reinforce required compliance with the City's applicable regulatory and policy framework such as the Fire Code, building regulations, and Brush Management Regulations. However, at a program level of review and without community-specific evaluation and project-specific details available for site-specific evaluation, the Blueprint SD PEIR concluded direct and cumulative impacts would be significant and unavoidable.

While the Blueprint SD Initiative areas could be subject to risks associated with downstream flooding or landslides, the existing regulatory framework related to flooding and geologic hazards would minimize potential risks. Although individual developments would typically be able to avoid impacts associated with the exposure of people or structures to risk resulting from runoff, post-fire slope instability or drainage changes through required compliance with City regulations, the Blueprint SD PEIR determined at a program level of review the significance of impacts cannot be determined. At the time of individual developments are brought forward, evaluation of site-specific conditions would be required. Therefore, in the absence of project-specific information, the Blueprint SD PEIR concluded that direct and cumulative impacts related to exposure of people and/or structures to significant risks because of runoff, post-fire slope instability or drainage changes would be significant.

Future projects that are consistent with the Blueprint SD Initiative would be required to implement Blueprint SD PEIR MM-FIRE-1 which requires an evaluation of the adequacy of evacuation routes, emergency access, and fire safety in light of the proposed land use and mobility network. The Blueprint SD PEIR also includes mitigation measure MM-FIRE-2 which requires future discretionary projects to demonstrate consistency with the City's applicable regulatory and policy framework such as the Fire Code, Building Regulations, Brush Management Regulations and Landscape Standards, as well as consistency with the California Office of the Attorney General issued guidance outlining best practices for

analyzing and mitigating wildfire impacts of development projects under CEQA for projects with a higher level of wildfire or evacuation risk, as determined by the City. However, at a program level of review and without project-specific details available for site-specific evaluation, the Blueprint SD PEIR concluded direct and cumulative impacts would be significant and unavoidable.

**Project**

The project site is located within a fully urbanized area surrounded by existing development and does not interface with wildland areas. In addition, the site is not located within a Very High Fire Hazard Severity Zone (City of San Diego, 2025c). As part of the City's standard development review process, project plans would be reviewed to ensure adequate emergency access to and from the site. The project would also be designed and constructed in accordance with the California Fire Code and applicable San Diego Municipal Code requirements. Therefore, the project would not expose people or structures to a significant risk of loss, injury, or death related to wildfire hazards.

The site has been previously developed, is relatively flat, and is not adjacent to steep slopes or other terrain features that could increase wildfire risk. Consequently, the project would not exacerbate wildfire hazards, expose people to substantial concentrations of pollutants from wildfire events, or contribute to the uncontrolled spread of wildfire. Furthermore, the project would connect to existing urban infrastructure and would not require the installation or maintenance of roads, fuel breaks, emergency water sources, power lines, or utility infrastructure that could increase fire risk or result in adverse environmental effects.

Information regarding emergency response and evacuation planning in the project vicinity is provided in the County of San Diego's 2023 Multi-Jurisdictional Hazard Mitigation Plan (MJHMP), which serves as a comprehensive framework for hazard preparedness, mitigation, and interagency coordination. The County General Plan Mobility and Safety Elements also reference the Operational Area Emergency Plan, including Annex Q (Evacuation), which identifies major transportation corridors as primary evacuation routes. Interstate 5, located near the project site, serves as a primary evacuation corridor in the area.

The project site is served by an established roadway network that provides access for emergency response and evacuation, including direct access to Interstate 5 via Morrell Street and Grand Avenue. The project would not impede emergency access, interfere with implementation of an adopted emergency response plan, or obstruct evacuation routes. Consequently, impacts related to emergency response and evacuation would be less than significant.

Based on the foregoing analysis, the proposed project remains within the scope of the impacts evaluated in the certified Program EIR. The project would not result in new significant environmental impacts or substantially increase the severity of previously identified impacts. Accordingly, no major revisions to the Program EIR are required.

## V. ISSUES NOT ANALYZED IN THE PREVIOUS EIR CEQA

CEQA Guidelines Section 15128, Effects Not Found To Be Significant, outlines that an EIR shall contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were therefore not discussed in detail in the EIR**.** The following effects were determined not to be significant and were therefore not discussed in detail in the certified Program EIR: Agriculture and Forestry Resources, Mineral Resources, and Population and Housing. Based on the environmental analysis, the City has concluded that the project evaluated in this Addendum is not expected to result in significant impacts to Agriculture and Forestry Resources, Mineral Resources, and Population and Housing beyond what was previously analyzed. While these effects were not analyzed in detail, as required by CEQA Guidelines Section 15128, there is no new information indicating that they would result in significant new impacts.

## VI. SIGNIFICANT UNMITIGATED IMPACTS

The Program EIR SCH No. 2021070359 determined that significant impacts related to aesthetics, air quality, biological resources, cultural resources, hydrology, noise, public services, recreation, transportation, tribal cultural resources, utilities and service systems, and wildfire would not be fully mitigated to below a level of significance. The Program EIR also concluded that cumulative impacts associated with aesthetics, biological resources, cultural resources, noise, public services, recreation, transportation, tribal cultural resources, utilities and service systems, and wildfire, which would remain significant and unmitigated. Because the original project approval involved significant and unavoidable impacts, the decision making body adopted CEQA Findings and a Statement of Override Considerations, concluding that: (a) specific economic, social, and other considerations rendered identified mitigation measures and project alternatives infeasible; and (b) the project's benefits outweighed its significant unavoidable environmental impacts.

The proposed project would not result in any new significant environmental impacts or substantially increase the severity of impacts previously identified in the certified Program EIR. As such, no new significant impacts have been identified that would require additional CEQA Findings or a new Statement of Overriding Considerations.

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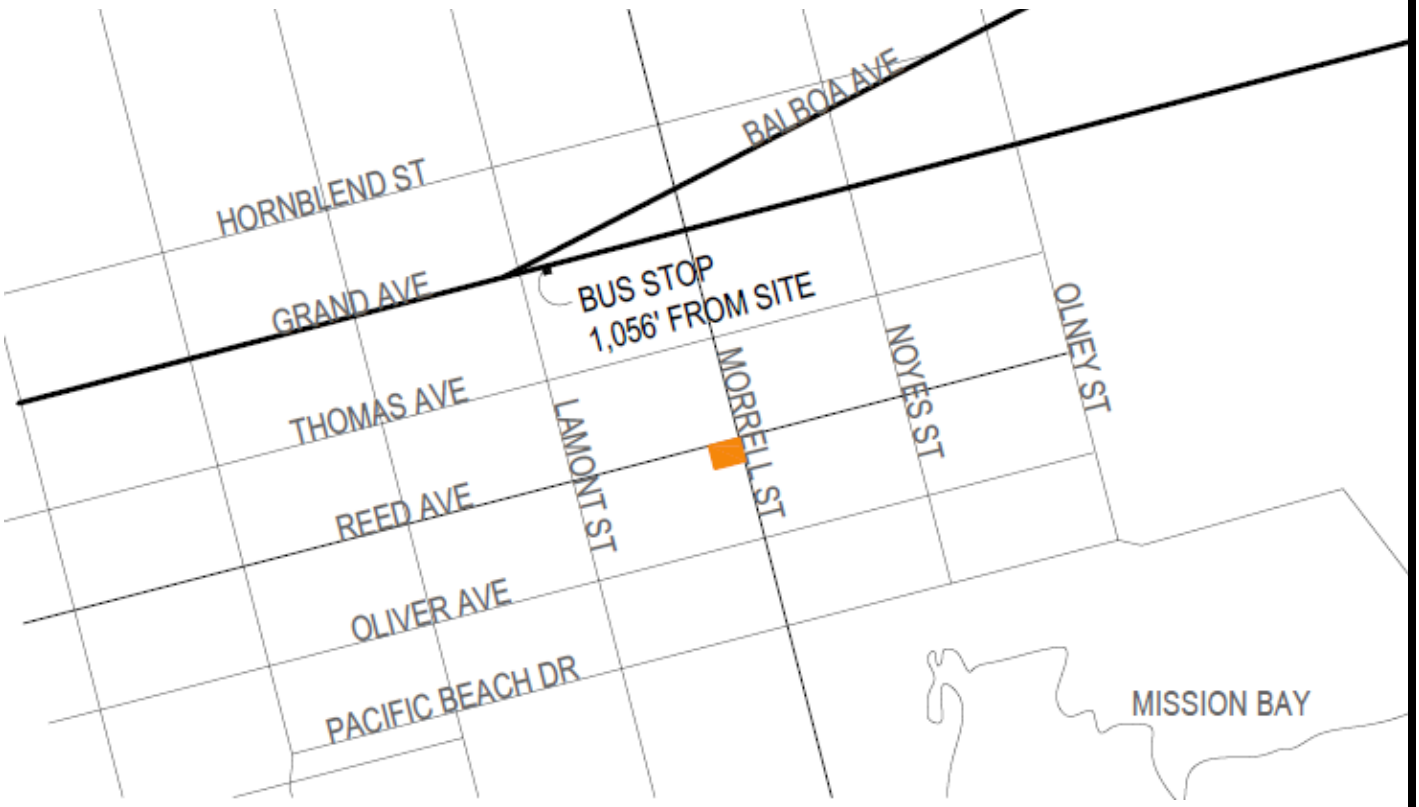
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The City of SAN DIEGO

# Project Location

4240 Morrell / PRJ-1128026

Development Services Department

**FIGURE No. 1**



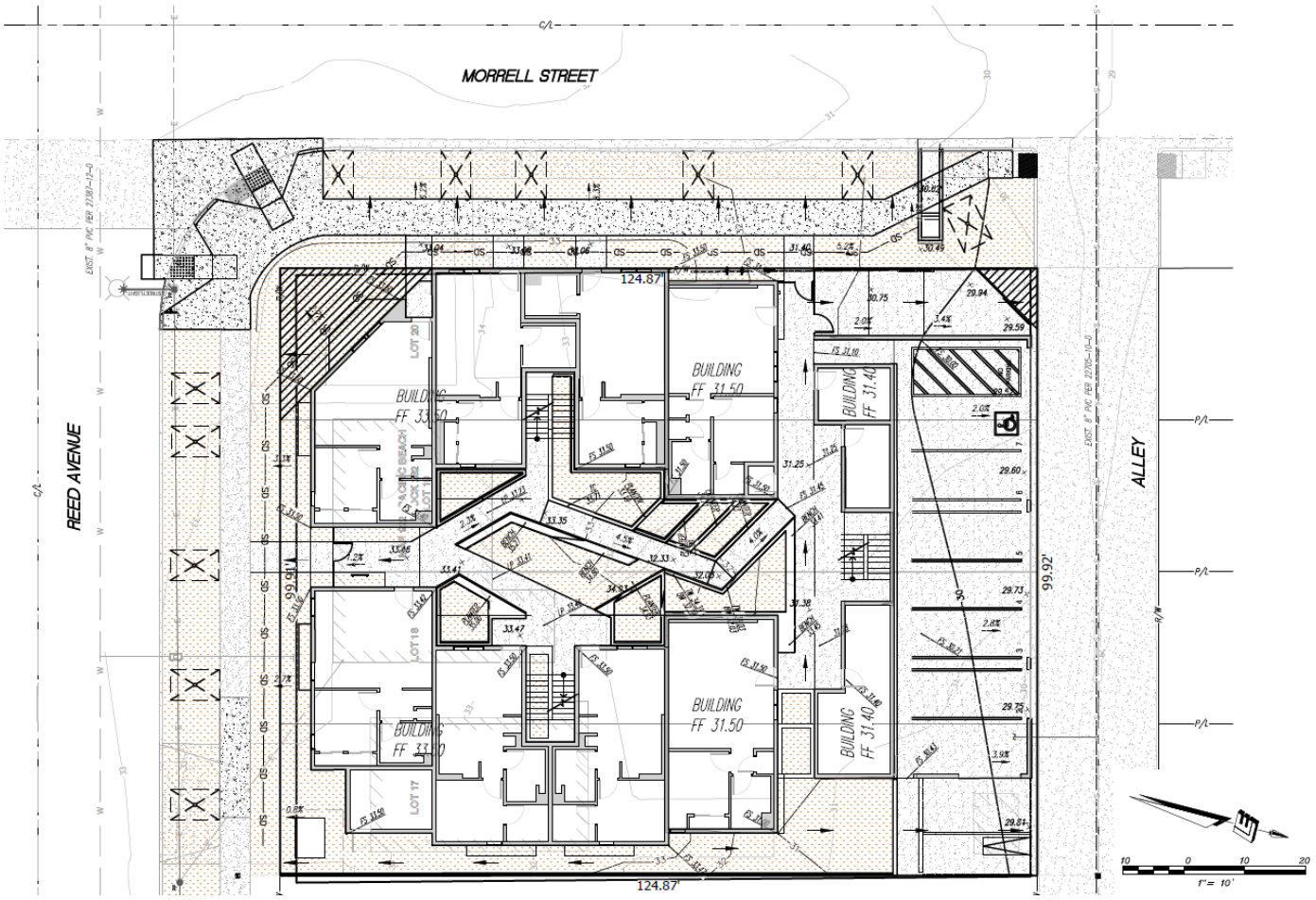
The City of SAN DIEGO

# Aerial Photograph

4240 Morrell / PRJ-1128026

Development Services Department

**FIGURE No. 2**




The City of SAN DIEGO

# Site Plan

4240 Morrell / PRJ-1128026

Development Services Department

**FIGURE No. 3**