



THE CITY OF SAN DIEGO

ADDENDUM

Project No. 671912
Addendum to EIR No. 346289
SCH No. 2013111017

SUBJECT: Alvarado Creek Apartments: A NEIGHBORHOOD DEVELOPMENT PERMIT, SITE DEVELOPMENT PERMIT, and PUBLIC SERVICE EASEMENT VACATION to construct 227 affordable residential rental apartment units in one 5-story, over one level above ground podium structure. The 227 residential units would include 54 studios, 54 one-bedroom units, 59 two-bedroom units, and 60 three-bedroom units. Common area amenities would include a pool area and access to the proposed community trail within the on-site portion of Alvarado Creek. Primary access would be provided via an existing driveway off of Mission Gorge Road that would be reconstructed as part of the project to provide access to a drop-off area in addition to a new project driveway to the parking garage. A total of 100 vehicular parking spaces would be provided. Existing sewer easements will be vacated and new sewer easements will be proposed to accommodate relocation of the sewer main to the easterly property line. The project is requesting allowable deviations from the development regulations pertaining to the requirement for Commercial Space, storage requirements, and personal open-space requirements. The 3.84-acre project site is located southeast of Mission Gorge Road, south of Mission Gorge Place, and north of Interstate 8 and the Grantville Trolley station. The site's general plan designation is Industrial Employment, the community plan land use designation is Multiple Use and the zoning designation is CC-3-9 (Community Plan: Urban Village 44-109 dwelling units per acre (DU/AC), Future Study Area) per the Navajo Community Plan. Additionally, the site is within the Grantville Community Plan Implementation Overlay Zone Type A (CPIOZ-A), The project site is located within Airport Influence Area (Review Area 2-Montgomery Field Airport) and Federal Aviation Administration Part 77 Notification Area (Montgomery Field Airport). (Assessor Parcel Numbers: 461-320-06, 461-320-08, and 461-320-09). APPLICANT: The Pacific Companies.

I. SUMMARY OF ORIGINAL PROJECT

The project site is within the plan boundaries of the Grantville Focused Planning Area (FPA) of the Navajo Community Plan. (Figures 1 and 2). The Grantville Focused Plan Amendment Final Programmatic Environmental Impact Report (Project No. 346289; SCH No. 2013111017) (hereinafter referred to as the FPA PEIR) was certified by the San Diego City Council on June 9, 2015, Resolution No. 309788. The Grantville FPA involved an amendment to the Navajo Community Plan, a General Plan Amendment, update to the Navajo Public Facilities Financing Plan (PFFP), adoption of a Rezone

Ordinance to implement the community plan, and amendment to the City's Land Development Code (LDC) Grantville Community Plan Implementation Overlay Zone. In accordance with California Environmental Quality Act (CEQA) Guidelines Section 15168, the FPA PEIR examined the environmental impacts of the Grantville FPA.

The Grantville FPA area is located within the Navajo Community Planning area west of Interstate 15 (I-15) and north of I-8; bounded by the Admiral Baker Golf Course to the north and the San Diego River to the west. The Grantville FPA area consists of approximately 280 acres and is comprised of commercial, office, industrial, public facility, park and open space uses immediately north of I-8 and located along both sides of Fairmount Avenue, Friars Road and Mission Gorge Road north to Zion Avenue.

The Grantville FPA area covers two (2) Community Plan Implementation Overlay Zones (CPIOZ) described in the Navajo Community Plan: Grantville-CPIOZ-Type A and part of the existing San Diego River Subdistrict – CPIOZ Type B. The list of criteria for each CPIOZ is included in the text of the amendment to the Navajo Community Plan; however, the Grantville CPIOZ-Type A area is the primary focus of the Community Plan Amendment for the Navajo Community Plan. The Grantville CPIOZ-Type A promotes mixed-use, transit-oriented development with pedestrian and bicycle orientation and allows for increased density of up to 109 dwelling-units per acre, resulting in a maximum total of approximately 4,594 dwelling units in the area surrounding the existing Grantville Trolley Station when certain criteria are met. Both areas follow the CPIOZ guidance per Land Development Code Chapter 13, Article 2, Division 14.

The Navajo PFFP Update reflects the community's boundary, development assumptions at community build-out, a listing of capital improvements, and an updated fee schedule. The Development Impact Fees (DIFs) provide a funding source for public facilities projects in the Navajo Community and were adopted in conjunction with the community plan amendment and certification of the FPA PEIR.

The FPA PEIR concluded that the project would result in significant and unavoidable environmental impacts for land use (noise compatibility), air quality, noise (operational), and transportation/circulation. The following issue areas were determined to be potentially significant but reduced to below a level of significance with mitigation: Noise (Construction), Biological Resources, Hydrology/Water Quality, Historical Resources (Built Environment and Archaeological), Geologic Conditions, Health and Safety, and Public Utilities (Solid Waste). Impacts for the following issue areas were determined to be less than significant: Greenhouse Gas Emissions, Paleontological Resources, Visual Quality/Neighborhood Character, Public Services and Facilities, Agricultural and Forest Resources, Mineral Resources, and Population and Housing.

II. SUMMARY OF PROPOSED PROJECT

A NEIGHBORHOOD DEVELOPMENT PERMIT, SITE DEVELOPMENT PERMIT, and PUBLIC SERVICE EASEMENT VACATION to construct 227 affordable residential rental multi-family units in one 5-story type III-A building, over one level of type I-A above ground podium structure. The 227 residential units include 54 studios, 54 one-bedroom units, 59 two-bedroom units, and 60 three-bedroom units. The project is requesting allowable deviations from the land development code regulations related to:

- Requirement for commercial space, per §131.0540(b),
- Storage requirements, in the CC-3-9 base zone and
- Requirement for personal open space requirements., per § 131.0455 (d)

Primary access is provided via an existing driveway off Mission Gorge Road that would be reconstructed as part of the project in addition to a new project driveway to the parking garage. A 15-foot wide parkway with a 10-foot wide contiguous sidewalk and 5-foot wide landscape area would be provided along the project frontage on Mission Gorge Road for pedestrian access. The project includes an onsite ride share drop-off/pickup area, turnaround, and garage parking with a total of 100 parking spaces. Common area amenities include a pool area and access to the proposed Alvarado Creek community trail. The Project includes wayfinding signage that identifies pedestrian and bicycle routes to and from the Grantville Trolley Station.

The project will provide twenty-three percent (23%) fair share contribution to improve Mission Gorge Road (between Fairmount Avenue and Mission Gorge Road) to its ultimate classification of a 4-Lane Major with a raised median. The project will also be striping Class II bicycle lanes across the site frontage.

The project will also provide transportation improvements including a 15-foot wide parkway with a 10-foot wide sidewalk along the project frontage on Mission Gorge Road a community trail along the onsite portion of Alvarado Creek, direct pedestrian access to Alvarado Creek from common areas and ground floor units, pedestrian and bicycle connections to each adjacent property, an onsite bike sharing program, wayfinding signage that identified pedestrian and bicycle routes to and from the Grantville Trolley Station, and highly visible crosswalks and traffic signal improvements at the following intersections: Mission Gorge Road/Fairmont Avenue, Mission Gorge Road/Mission Gorge Place, and fair share contributions to crosswalks and traffic signal improvements at Mission Gorge Road/Twain Avenue and Mission Gorge Road/Vanderer Avenue. Project implementation would require that the development pad to be elevated above the Alvarado Creek 100-year floodplain elevation and Alvarado Creek channel slope erosion protection be constructed. A community trail would be constructed along the onsite portion of Alvarado Creek, and a wetland buffer is proposed between the development pad/trail and existing and restored Alvarado Creek riparian vegetation. An existing sewer line and easement would be relocated southerly across Alvarado Creek to an existing point of connection near the Grantville Trolley Station. Grading would be required along the southern side of the onsite portion of the Alvarado Creek floodplain to ensure that the 100-year floodplain water surface elevation does not increase due to the proposed project.

Various onsite improvements would also be constructed that include associated hardscape (including a pool) and landscape, as well as storm water, water, sewer power and natural gas connections and communications. The project is requesting allowable deviations from the development regulations related to commercial space, storage requirements, and personal open space requirements. All landscaping materials and irrigation within the project site would conform to the requirements of the City LDC Landscape Standards and the applicable sections of San Diego Municipal Code Chapter 14, Article 2, Division 4: Landscape Regulations. A community trail is proposed to be constructed along the onsite portion of Alvarado Creek, and a wetland buffer is proposed between the development pad/trail and the existing and proposed Alvarado Creek riparian vegetation. Project landscaping would incorporate native upland and riparian transitional species such as coastal sage scrub and chaparral communities between the development and the community trail to form a more natural transition zone above wetland areas. These landscaped

areas will be managed as part of the long-term management of the site. Areas to the north and south of Alvarado Creek would incorporate wetland restoration, creation, and enhancement. Within the development site, the project would incorporate pervious pavement, stormwater treatment planters, and benches. The on-site plant palette includes, but is not limited to, drought-tolerant turf grass, groundcover plants (e.g., trailing ice plant, succulents), stormwater management plantings (e.g., common yarrow, Santa Barbara sedge), perennials (e.g., bush lily, African iris), shrubs (e.g., blue fescue, Carolina cherry), palms (e.g., king palm, date palm), and trees (e.g., Mediterranean fan palm, carrot wood).

Project implementation requires that the development pad be elevated above the Alvarado Creek 100-year floodplain elevation and Alvarado Creek channel slope erosion protection be constructed. The slope erosion protection would consist of an earthen channel slope with rip rap at the base. Grading would be required along the southern side of the onsite portion of the Alvarado Creek floodplain to ensure that the 100-year floodplain water level does not increase due to the project. In total, construction of the project would require 15,600 cubic yards (CY) of fill and 2,900 CY of cut (along the southern bank of the on-site portion of Alvarado Creek) resulting in 12,700 CY of import. The project would also incorporate an underground stormwater vault with incorporated on-site treatment, designed to capture onsite runoff and treat water prior to discharging runoff into Alvarado creek via an outfall south of the development. Another stormwater outfall would convey stormwater and urban runoff from Mission Gorge Road along the east and south perimeter of the project site before discharging into Alvarado Creek. The outfalls would be designed with concrete headwalls and include permanent erosion control features. An existing sewer line and easement is proposed to be relocated southerly across Alvarado Creek to an existing point of connection near the Grantville Trolley Station. Existing sewer easements will be vacated and new sewer easements will be proposed to accommodate relocation of the sewer main to the easterly property line.

Project construction is anticipated to occur in a single project phase and is anticipated to be completed in approximately 18 months. Along with typical construction equipment such as excavators, scrapers, loaders, forklifts, drills, dump trucks, and support vehicles, project construction may require for concrete pumping via a truck-towed line pump or a standalone boom pump rig. The project may also require specialized equipment for stream diversions during work within Alvarado Creek, such as stationary pumps and tanks. The project would require multiple cranes to lift prefabricated project units and other project materials into place. Crane set up and decommissioning is planned to occur at night utilizing one lane of Mission Gorge Road between 7 PM and 7 AM to minimize traffic delays. Crane set up and decommissioning will require 4 days to set up and 4 days to decommission. Project construction would occur from 7:00 a.m. to 7:00 p.m. and would not occur on any legal holidays or Sundays, pursuant to SDMC Section 59.5.0404.

The project site is located within Reach 2 of the Grantville Trolley Station/Alvarado Creek Revitalization Study, which requires the relocation and construction of the Alvarado Creek channel, creek trails and habitat restoration/creation. Implementation of the onsite portion of the Alvarado Creek improvements outlined in the revitalization study will require additional final engineering and environmental design, and coordination with upstream and downstream property owners, and will be implemented following construction of the project. The proposed channel slope erosion protection discussed above is an interim measure until the ultimate Alvarado Creek channel improvements and habitat restoration are completed in the future.

The Regional Location is shown in Figure 1 with the Vicinity Map shown in Figure 2. The Site Plan is shown in Figure 3 and the Perspective is shown in Figure 4.

III. ENVIRONMENTAL SETTING

The 3.84-acre (2.03 acres net) undeveloped project site is located southeast of Mission Gorge Road, south of Mission Gorge Place, and north of Interstate 8 and the Grantville Trolley station (Assessor Parcel Numbers (APNs) include 416-320-06-00, 461-320-08-00 and 461-320.09-00). The project is located approximately 2,000 feet walking distance from the Grantville Trolley Station, which is serviced by the Metropolitan Transit System (MTS) Sycuan Green Line Trolley that runs between 12th/Imperial Transit Center and Santee, as well as MTS bus routes 13, 14 and 18. Bus route 13 directly serves the project site with two bus stops provided along Mission Gorge Road between Fairmount Avenue and Mission Gorge Place. Six-foot wide contiguous sidewalks are provided on both sides of Mission Gorge Road. Six-foot wide contiguous sidewalks are also provided in one direction of travel along the north sides of Alvarado Canyon Road and Camino Del Rio North. There are no bike lanes along Mission Gorge Road from Fairmount Avenue to Friars Road, on Fairmount Avenue north of Mission Gorge Road, or on Mission Gorge Place. Five-foot wide bike lanes are provided on both sides of the street along Camino Del Rio North, west of Fairmount Avenue.

The southern portion of the project site include illegal dumping, fill material storage, and homeless encampments.

The site is bordered by light industrial and commercial land uses to the north and west and a mix of undeveloped and/or disturbed land, light commercial, and the Grantville Trolley Station to the south and east. Montgomery Field Airport is located approximately 2.3 miles northwest of the project site. The project site is located in a developed area served by existing public services and utilities. The project site is relatively flat with elevations ranging from 64 to 96 feet above mean sea level. The majority of the project site consists of disturbed or developed land with limited vegetation. Vegetation communities are concentrated in the southern portion of the site along Alvarado Creek and consist primarily of Arundo-dominated wetland, non-native riparian, and southern riparian woodland.

The land use designation is Multiple Use and the zoning designation is CC-3-9 (Community Plan: Urban Village -44-109 DU/AC, Future Study Area) per the Navajo Community Plan. The site is within the Grantville Community Plan Implementation Overlay Zone Type A (CPIOZ-A). Additionally, the site is located within Airport Influence Area (Review Area 2-Montgomery Field Airport), Federal Aviation Administration Part 77 Notification Area (Montgomery Field Airport) and Reach 2 of the draft Grantville Trolley Station/Alvarado Creek Revitalization Study.

IV. ENVIRONMENTAL DETERMINATION

The City prepared and certified the FPA PEIR on June 9, 2015 (Project No. 346289; SCH No. 2013111017) per Resolution No. R- 309788. Based on all available information in light of the entire record, the analysis in this Addendum, and pursuant to Section 15162 and 15164 of the State CEQA Guidelines that:

- There are no substantial changes proposed in the project which will require major revisions of the previous environmental document due to the involvement of new

significant environmental effects or a substantial increase in the severity of previously identified significant effects;

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

Based upon a review of the current project, none of the situations described in Sections 15162 and 15164 of the State CEQA Guidelines apply. No changes in circumstances have occurred, and no new information of substantial importance has manifested, which would result in new significant or substantially increased adverse impacts as a result of the project. Therefore, this Addendum has been prepared in accordance with Section 15164 of the State CEQA Guidelines. The FPA PEIR has been incorporated by reference pursuant to CEQA Guidelines Section 15150. Public review of an Addendum is not required by the CEQA Guidelines.

V. IMPACT ANALYSIS

This Addendum includes the environmental issues analyzed in detail in the previously certified FPA PEIR as well as the project-specific environmental analysis pursuant to CEQA. The analysis in this document evaluates the adequacy of the PEIR relative to the project and documents that the proposed modifications and/or refinements would not cause new or more severe significant impacts than those identified in the previously certified environmental document.

The FPA PEIR identified significant and unavoidable impacts related to land use (noise compatibility), air quality, noise (operational), and transportation/circulation, as these issue areas would not be

fully mitigated to below a level of significance. With respect to cumulative impacts, implementation of the FPA PEIR would result in significant and unavoidable cumulative impacts to land use (related to noise), transportation/circulation, air quality and odor, and noise impacts.

The FPA PEIR identified significant direct impacts that would be substantially lessened or avoided with subsequent projects' implementation of the mitigation framework included in the Final PEIR, including impacts related to noise (construction), biological resources, hydrology/water quality, historical resources (built environment and archaeological), geologic conditions, health and safety, and public utilities (solid waste).

An overview of the project's impacts related to those of the previously certified FPA PEIR is provided below in Table 1, Impact Assessment Summary. The following analysis indicates there would be no new significant impacts, nor would there be an increase in the severity of impacts resulting from the project. Further, there is no new information in the record or otherwise available indicating that there are substantial changes in circumstances that would require major changes to the PEIR.

Environmental Issues	FPA PEIR Finding Analysis	Grantville FPA Mitigation	Project	Project Level New Mitigation?	Project Resultant Impact
Land Use	Significant, unmitigated	Yes	No new significant impacts;	No	Less Than Significant
Transportation / Circulation	Significant, unavoidable	Yes	No new significant impacts;	Yes	Significant, unavoidable
Air Quality and Odor	Significant, unmitigated	Yes	No new significant impacts	No	Less Than Significant
Greenhouse Gas Emissions	Less than Significant	Yes	No new significant impacts	No	Less than Significant
Noise	Significant, unmitigated	Yes	No new significant impacts	No	Mitigated to a Level Less Than Significant
Biological Resources	Mitigated to a Level Less Than Significant	Yes	No new significant impacts	Yes	Mitigated to a Level Less Than Significant
Hydrology and Water Quality	Mitigated to a Level Less Than Significant	Yes	No new significant impacts	No	Less Than Significant
Historic Resources	Mitigated to a Level Less Than Significant	Yes	No new significant impacts	No	Less Than Significant
Visual Effects/ Neighborhood Character	Less than significant	No	No new significant impacts	No	Less than Significant
Geologic Conditions	Mitigated to a Level Less Than Significant	No	No new significant impacts	No	Less Than Significant

Table 1 Proposed Project / FPA EIR Impact Assessment Summary					
Environmental Issues	FPA PEIR Finding Analysis	Grantville FPA Mitigation	Project	Project Level New Mitigation?	Project Resultant Impact
Health and Safety	Mitigated to a Level Less Than Significant	Yes	No new significant impacts;	No	Less Than Significant
Public Services and Facilities	Less than significant	No	No new significant impacts	No	Less than Significant
Public Utilities	Mitigated to a Level Less Than Significant	Yes	No new significant impacts;	No	Less than significant
Agricultural and Mineral Resources	No impact	No	No new significant impacts	No	No impact

Land Use

FPA PEIR

Section 5.1 of the FPA PEIR provided an analysis of land use impacts associated with the FPA. Issue 1 analyzed the FPA's consistency with applicable land use plans on a plan-by-plan basis, including the City of San Diego General Plan (General Plan), the City of San Diego Land Development Code (LDC), the Navajo Community Plan, the Multiple Species Conservation Program (MSCP), the San Diego River Park Master Plan, the Montgomery Field Airport Land Use Compatibility Plan (ALUCP), the SANDAG Regional Comprehensive Plan, and Historical Resources Regulations (Section 143.0210 of the LDC). The FPA PEIR concluded that the FPA would have a potentially significant impact because historical resources are known to occur within the FPA area that could be disturbed during future development, and the FPA would conflict with the goal in Section E of the General Plan Noise Element. The FPA PEIR determined that the FPA would be consistent with all other aforementioned plans. To reduce the historical resource-related impact, the FPA PEIR provided Mitigation Measures HR-1 and HR-2, which require the City to identify historical structures and the presence of archaeological resources prior to issuing any development permits, as well as ensure that acceptable site-specific mitigation is incorporated to reduce impacts. The FPA PEIR concluded that implementation of these mitigation measures would reduce the historical resources impact to a less-than-significant level. To reduce the noise impact, the FPA PEIR provided Mitigation Measures N-1 through N-6 but determined that the impact would remain significant and unmitigable.

The goal in Section E of the General Plan Noise Element aims to minimize exposure of noise-sensitive land uses to excessive commercial, industrial, and mixed-use related noise. The conflict with the FPA would occur because build-out under the FPA could potentially result in the exposure of noise-sensitive land uses (e.g., residences) to future noise levels that exceed those established in the General Plan Noise Element. The FPA EIR determined that implementation of Mitigation Measures N-1 through N-6 would generally reduce noise-related land use compatibility impacts by requiring future development under the FPA to conduct a project-specific noise study, prepare a noise control plan, follow certain construction guidelines, and include noise attenuation techniques for projects that would expose residences to noise levels that exceed City standards. However, the FPA PEIR determined that these mitigation measures would not be able to reduce the impact to a less-than-significant level in all situations and, thus, would result in a conflict with the goal in Section

E of the General Plan Noise Element. Because no other feasible mitigation was identified, the FPA PEIR concluded that the FPA would result in a significant and unmitigable impact regarding consistency with the Noise Element of the General Plan.

Issue 2 expanded on the analysis of noise-related land use compatibility and analyzed both temporary construction noise and long-term operational noise. The FPA PEIR concluded that the FPA would have a potentially significant impact regarding both construction and operational noise because implementation of the FPA would result in the exposure of sensitive receptors to temporary and permanent noise levels that exceed City standards. The FPA PEIR discussed how construction noise associated with development under the FPA would occur throughout the plan area and could cause a temporary increase in noise level at adjacent sensitive receptors that exceeds the City standard of 75 dB L_{eq} between the hours of 7:00 a.m. and 7:00 p.m. The FPA PEIR also discussed how increased traffic volumes associated with development under the FPA would result in increased traffic noise levels that are anticipated to exceed the applicable City threshold of 3 A-weighted decibels (dBA), resulting in a substantial permanent increase in noise level. As under Issue 1, Mitigation Measures N-1 through N-6 were provided. The FPA PEIR determined that implementation of these mitigation measures would avoid, reduce, or minimize impacts to the extent feasible. However, Mitigation Measures N-1 through N-6 would not be able to fully mitigate the impact to a less-than-significant level in all cases at the project-level. Therefore, the FPA PEIR concluded that the impact would remain significant and unmitigable.

Issue 3 analyzed the potential of the FPA to result in adverse edge effects to the Multi-Habitat Planning Area (MHPA). The FPA PEIR concluded that the impact would be potentially significant because future development under the FPA could potentially result in adverse edge effects (e.g., dumping, vehicular traffic, predation by domestic animals). This impact specifically pertains to future development under the FPA that occurs adjacent to the MHPA. MHPA land is located within and adjacent to the FPA area's western boundary, as well as adjacent to part of the FPA area's southern boundary. The impact was reduced to a less-than-significant level with implementation of Mitigation Measure LU-1, which requires that all future actions undertaken at or near the San Diego River or adjacent to the MHPA be reviewed for consistency with all applicable MSCP requirements and MHPA Land Use Adjacency Guidelines.

Issue 4 analyzed the FPA's consistency with local plans, policies, and ordinances that protect biological resources. The FPA PEIR concluded that the impact would be potentially significant because future development under the FPA could have direct and indirect impacts to MHPA lands. The impact was reduced to a less-than-significant level with implementation of Mitigation Measure LU-1, discussed above.

Overall land use impacts associated with the FPA were determined to be significant and unmitigated.

Project

The existing general plan land use designation is Industrial Employment, the Navajo Community Plan land use designation for the project site is Multiple Use, and the zoning designation is CC-3-9 (Community Plan: Urban Village-44-109 DU/AC, Future Study Area). Development of the project would be consistent with the existing land use and zoning designations of the site and, thus, would be consistent with the land use objectives in the Navajo Community Plan and the LDC.

The project site is located within Reach 2 of the Grantville Trolley Station/Alvarado Creek Revitalization Study, which requires the relocation and construction of the Alvarado Creek channel, creek trails and habitat restoration/creation. Implementation of the onsite portion of the Alvarado Creek improvements outlined in the revitalization study will require additional final engineering and environmental design, and coordination with upstream and downstream property owners, and will be implemented following construction of the project. The proposed channel slope erosion protection discussed above is an interim measure until the ultimate Alvarado Creek channel improvements and habitat restoration are completed in the future.

The project would also be consistent with all four airport land use compatibility factors (noise, safety, airspace protection, and overflight) in the Montgomery Field ALUCP because the project, which would be 82 feet tall, would comply with the FAA's maximum height restriction of 200 feet for structures located within the Part 77 Notification Area. Additionally, the project site is located outside of all designated safety zones, airport overflight notification areas, and the airport's 60 dBA Community Noise Equivalent Level (CNEL) noise contour.

The project would also be consistent with the San Diego River Park Master Plan recommendations regarding the Confluence Reach section, development in the Grantville Subarea, and Alvarado Creek (Section 3.2.3, Confluence Reach) because it would improve creek flow in the on-site portion of Alvarado Creek through additional cut on the south (non-project) side of Alvarado Creek; create, restore, or enhance wetland habitat and native habitats within the on-site portion of Alvarado Creek; provide a community trail along the on-site portion of Alvarado Creek; and improve community access to and engagement with the creek. The project would be consistent with the SANDAG Regional Comprehensive Plan because the project would provide a high-density, transit-oriented, 100% affordable housing located adjacent to the Grantville Trolley Station.

FPA PEIR Mitigation Measures HR-1 and HR-2 are applicable to the project and the requirements of both mitigation measures have already been completed through preparation of the project-specific Archaeological Survey, in which the site was screened for existing historical and archaeological resources consistent with Historical Resources Regulations. The Archaeological Survey did not identify any historical or archaeological resources that could be impacted or disturbed by project construction and determined that the potential for buried deposits is low at the project site.

FPA PEIR Mitigation Measures N-1, N-2, and N-3 are applicable to the project. Mitigation Measure N-4 is not applicable to the project because no residential receptors are located close to the project site, and Mitigation Measure N-6 is not applicable to the project because the project-specific Noise Impact Assessment determined that construction noise levels would not exceed the City standard of 75 dB L_{eq} at the nearest sensitive receptor. Mitigation Measure N-1 has already been achieved through completion of the project-specific Noise Impact Assessment, which analyzed both construction and operational noise impacts. Mitigation Measures N-2 and N-3 involve requirements for the operation of construction equipment and would be implemented during project construction and have been included in the Mitigation Monitoring and Reporting Program (MMRP). Mitigation Measure N-6 requires the project to incorporate noise attenuation measures pursuant to California Energy Code Title 24 standards to achieve the 45 dBA interior standard. Implementation of Mitigation Measure N-6 would ensure that indoor and outdoor levels at the project site would not expose future residents to noise levels exceeding City standards. The Noise Impact Assessment recommended that the several interior noise-reducing features be incorporated into the project in order to ensure an interior noise level of 45 dBA CNEL or less. These features have been

incorporated into the MMRP to ensure compliance with Mitigation Measure N-6. During project operation, construction activities in the vicinity could expose residents of the project to temporary noise level increases. However, these future projects would be required to analyze noise impacts at a project level and demonstrate compliance with City construction noise standards. With implementation of Mitigation Measures N-1, N-2, N-3, and N-6, the project would comply with the goal in Section E of the General Plan Noise Element because the project would not expose any sensitive receptors to noise levels that exceed City standards. The project would be consistent with all other goals and policies in the General Plan.

In summary, the project would be consistent with the Navajo Community Plan, LDC, Montgomery Field ALUCP, River Park Master Plan, SANDAG Regional Comprehensive Plan, Historical Resources Regulations, and General Plan, including the goal in Section E of the Noise Element. For the reasons listed above, the project would result in a less-than-significant impact regarding compliance with applicable land use plans.

Regarding consistency with the MHPA/MSCP Subarea Plan and ESL regulations, the project site is isolated from the closest MHPA land, which is located approximately 0.35 miles to the west and northwest and 0.36 miles to the south. The land between the MHPA and the project site is highly developed and disturbed, including several buildings and roadways, including I-8. Therefore, adverse edge effects and other direct or indirect impacts to biological resources protected by the MSCP are not anticipated to occur as a result of the project. However, because the project site is bisected by Alvarado Creek, which is a tributary to the San Diego River, FPA PEIR Mitigation Measure LU-1 is applicable to the project. The requirements of Mitigation Measure LU-1 have already been satisfied through preparation of the project-specific Biological Survey Report. The project-specific Biological Survey Report concluded that the project would not conflict with the MSCP or any other approved local, regional, or State habitat conservation plans with implementation of recommended mitigation, which requires the applicant to prepare a Storm Water Pollution Prevention Plan (SWPPP) and a Habitat Mitigation and Monitoring Plan (HMMP) to be approved by the City. Implementation of this mitigation measure would reduce the impact to a less-than-significant level by restoring wildlife habitat and protecting water quality in Alvarado Creek.

Based on the foregoing analysis and information, there are no changes in circumstances or new information identified above that would require a major change to the FPA PEIR. The project would not result in a new significant impact or a substantial increase in the severity of any significant impact identified in the FPA PEIR.

Transportation/Circulation

FPA PEIR

Section 5.2 of the FPA PEIR provides an analysis of transportation/circulation impacts associated with implementation of the FPA.

Issue 1 concluded that the existing + project and year 2030 + project impacts associated with traffic and capacity of the circulation system would be significant. Specifically, a total of 8 City street intersections and 15 roadway segments would be expected to operate at an unacceptable level of service (LOS), resulting in significant transportation impacts (Table 2).

Table 2
Summary of Significant Traffic Impacts and Mitigation Measures in the FPA PEIR

Intersections	Mitigation Measures	FPA PEIR Impact Conclusion
Intersections		
Friars Road/Riverdale Street (LOS F during the AM and PM peak hours)	T-1	significant and unavoidable
Mission Gorge Road/Zion Avenue (LOS F during the AM and PM peak hours);	T-2	significant and unavoidable
Mission Gorge Road/Princess View Drive (LOS F during the AM peak hour);	T-3	significant and unavoidable
Waring Road/Princess View Drive (LOS E during the AM peak hour);	T-4	significant and unavoidable
Waring Road/Zion Avenue (LOS F during the AM peak hour, LOS E during the PM peak hour);	T-5	significant and unavoidable
Fairmount Avenue/Mission Gorge Road (LOS E during the AM peak hour);	T-6	significant and unavoidable
Fairmount Avenue/Alvarado Road/Camino Del Rio N. (LOS F during the AM and PM peak hour);	T-16	significant and unavoidable
Alvarado Canyon Road/Mission Gorge Place (LOS F during the AM and PM peak hours).	T-7	significant and unavoidable
Roadway Segments		
Friars Road: I-15 NB Ramps to Rancho Mission Road (LOS F)	T-8	significant and unavoidable
Friars Road: Rancho Mission Road to Santo Road (LOS F)	T-9	significant and unavoidable
Friars Road: Santo Road to Riverdale Street (LOS F)	T-10	significant and unavoidable
Mission Gorge Road: Mission Gorge Place to Fairmount Avenue (LOS F)	T-14	significant and unavoidable
Mission Gorge Road: Rainier Avenue to Vandever Avenue (LOS E)	T-11	significant and unavoidable
Mission Gorge Road: Vandever Avenue to Twain Avenue (LOS F)	T-12	significant and unavoidable
Mission Gorge Road: Twain Avenue to Mission Gorge Place (LOS E)	T-13	significant and unavoidable
Fairmount Avenue: Vandever Avenue to Twain Avenue (LOS F)	T-15	significant and unavoidable
Fairmount Avenue: Mission Gorge Road to Alvarado Canyon Road (LOS F)	T-16	significant and unavoidable
Fairmount Avenue: Alvarado Canyon Road to I-8 WB Ramps (LOS F)	T-17	significant and unavoidable
Fairmount Avenue: I-8 WB Ramps to I-8 EB Ramps (LOS F)	T-18	significant and unavoidable
Vandever Avenue: Riverdale Street to Mission Gorge Road (LOS E)	T-19	significant and unavoidable
Twain Avenue: Fairmount Avenue to Mission Gorge Road (LOS F)	T-20	significant and unavoidable
San Diego Mission Road: Rancho Mission Road to Fairmount Avenue (LOS F)	T-21	significant and unavoidable

Table 2 Summary of Significant Traffic Impacts and Mitigation Measures in the FPA PEIR		
Zion Avenue: Mission Gorge Road to Waring Road (LOS F)	T-22	significant and unavoidable
Source: FPA PEIR.		

Mitigation Measures T-1 through T-22 were identified to reduce impacts, with each measure separately addressing 1) an intersection (T-1 through T-7) or 2) roadway segment (T-8 through T-22) for which a significant impact was identified. The FPA PEIR concluded that, when implemented, Mitigation Measures T-1, T-3, T-4, T-5, T-6, T-7, T-11, T-12, T-13, T-14, T-15, T-19, and T-20 would improve LOS to acceptable levels and reduce the impacts to less than significant. The FPA PEIR also found that Mitigation Measures T-8 and T-9 would improve LOS but not to acceptable levels, so the impacts would remain significant and unavoidable. However, the FPA PEIR concluded that these 15 mitigation measures were infeasible because the degree of future impacts and applicability, feasibility, specific design, and success of future mitigation measures cannot be adequately known for each specific future project at the program level in such a manner as to avoid conflict with the goals and policies and objectives of the FPA, in particular those relating to pedestrians, bicycles, and transit-oriented development.

Implementation of Mitigation Measures T-2, T-10, T-16, T-17, and T-18 would improve LOS but not to acceptable levels so the impacts would remain significant and unavoidable. Mitigation Measures T-21 and T-22 would reduce LOS to acceptable levels, but the FPA PEIR concluded they were infeasible due to potential environmental effects to the San Diego River and nearby communities and residential properties, respectively.

Issue 2 concluded that transportation impacts related to implementation of the FPA would be potentially significant, but the impact would be reduced to a less-than-significant level through implementation of mitigation measures (described below) and with approval of an amendment to the Navajo Community Plan to convert land use designations and zoning within the FPA area. The FPA PEIR discusses that the FPA includes a land use amendment to convert a mostly commercial and industrial area to a mixed-use transit-oriented development that aims to reduce vehicle trips and promote all modes of transportation. Nevertheless, the FPA would ultimately result in increased density and, thus, a significant increase in Average Daily Trips (ADT) within the FPA study area. The FPA PEIR concluded that implementation of Mitigation Measures T-1 to T-7, T-11 to T-20, and T-23 to T-26 would ensure that the FPA would not result in trip generation in excess of the Navajo Community Plan trip allocation. Mitigation Measures T-1 to T-7 and T-11 to T-20 were included under Issue 1 to reduce transportation significant impacts to certain intersections and roadway segments. Mitigation Measures T-23 to T-26 were included specifically under Issue 2 and include measures to improve pedestrian and bicycle circulation, along with other transit improvements (e.g., wayfinding signage) and transportation demand management strategies (e.g., carpooling, vanpooling, telecommuting).

Issue 3 concluded that eight freeway segments, one freeway ramp, and two freeway interchange intersections would be expected to operate at an unacceptable LOS in the Year 2030, resulting in a potentially significant impact. The FPA PEIR provided Mitigation Measures T-27 through T-34 to mitigate impacts to freeway segments and Mitigation Measures T-35 through T-37 to mitigate impacts to freeway interchanges. However, the FPA PEIR concluded that the LOS impacts for certain

freeway segments and interchanges would remain significant and unavoidable after implementation of mitigation measures.

Issue 4 concluded that because the FPA is designed to be consistent with the City's roadway standards, the FPA would not create a hazard for vehicles, bicycles, or pedestrians in the FPA area. Therefore, the FPA would have a less-than-significant impact regarding traffic hazards.

Issue 5 concluded that the FPA would have no impact regarding consistency with local policies, plans, and programs that support alternative transportation modes because the FPA supports transit-oriented development and encourages the use of alternative transportation.

Overall impacts associated with Transportation and Circulation and were determined to be significant and unavoidable.

Project

As provided in CEQA Guidelines Section 15007, "amendments to the guidelines apply prospectively only," and CEQA documents must meet the "content requirements in effect when the document was set out for public review," and "shall not need to be revised to conform to any new content requirements in guideline amendments taking effect before the document is finally approved."

The FPA PEIR was adopted May 2015, prior to the amendment to the CEQA Guidelines adding VMT as the primary measure of transportation impacts and to the requirement for analysis of VMT going into effect (i.e., July 1, 2020) as detailed in CEQA Guidelines Section 15064.3.

In conformance with SB 743, the project's transportation impacts were evaluated using a VMT metric, pursuant to the latest direction from the OPR Technical Advisory, and consistent with the City's Transportation Study Manual (TSM) adopted by City Council in November 2020.

As the City of San Diego has developed significance thresholds and technical methodologies, the TSM (September 2020) was utilized to perform a Project-Specific VMT Analysis. The TSM provides guidance for the City's CEQA significance thresholds, screening criteria, and methodology for conducting VMT analysis and for the preparation of Local Mobility Analyses (LMA) to identify off-site infrastructure improvements in the project vicinity that may be triggered with the development of a project, as well as to analyze site access and circulation and evaluate the local multi-modal network available to serve the project (City of San Diego 2020). According to the TSM, a project that meets at least one of the following screening criteria would be presumed to have a less than significant transportation VMT impact due to the project characteristics and/or location:

- **Residential or Commercial Project Located in a VMT Efficient Area:** The project is a residential or commercial employment project located in a VMT efficient area (15% or more below the base year average VMT per Capita or VMT per Employee) based on the applicable location-based screening map produced by SANDAG.
- **Industrial or Agricultural Project Located in a VMT Efficient Area:** The project is an industrial employment or agricultural employment project located in VMT efficient area (in an area with average or below average base year VMT per Employee) based on the applicable location-based screening map produced by SANDAG.
- **Small Project:** The project is a small project defined as generating less than 300 daily unadjusted driveway trips using the City of San Diego trip generation rates/procedures.

- **Locally Serving Retail/Recreational Project:** The project is a locally serving retail/recreational project defined as having 100,000 square feet gross floor area or less and demonstrates through a market area study that the market capture area for the project is approximately three miles (or less) and serves a population of roughly 25,000 people or less. Locally serving retail is consistent with the definitions of Neighborhood Shopping Center in the San Diego Municipal Code Land Development Code Trip Generation Manual. Locally serving recreation land uses are listed in Appendix B, if they meet the square footage and market capture area above. Adding retail/recreation square footage (even if it is 100,000 square feet gross floor area or less) to an existing regional retail shopping area is not screened out.
- **Locally Serving Public Facility:** The project is a locally serving public facility defined as a public facility that serves the surrounding community or a public facility that is a passive use. The following are considered locally serving public facilities: transit centers, public schools, libraries, post offices, park-and-ride lots, police and fire facilities, and government offices. Passive public uses include communication and utility buildings, water sanitation, and waste management.
- **Affordable Housing:** The project has access to transit and is wholly or has a portion that meets one of the following criteria: is affordable to persons with a household income equal to or less than 50% of the area median income (as defined by California Health and Safety Code Section 50093), housing for senior citizens [as defined in Section 143.0720(e)], housing for transitional foster youth, disabled veterans, or homeless persons [as defined in 143.0720(f)]. The units shall remain deed restricted for a period of at least 55 years. The project shall provide no more than the minimum amount of parking per unit, per San Diego Municipal Code Section 143.0744. Only the portion of the project that meets the above criteria is screened out. For example, if the project is 100 units with 10 deed-restricted affordable housing units, transportation VMT analysis would not be necessary for the 10 affordable units but would be necessary for the remaining 90 units (unless they meet one of the other screening criteria). For purposes of applying the small project screening criteria, the applicant would only include the trip generation for the non-affordable housing portion of the project (since the affordable housing portion is screened out).
- **Mixed Use Project Screening Considerations:** The project's individual land uses should be compared to the screening criteria above. It is possible for some of the mixed-use project's land uses to be screened out and some to require further analysis. For purposes of applying the small project screening criteria, the applicant would only include the trip generation for portions of the project that are not screened out based on other screening criteria. For example, if a project includes residential and retail, and the retail component was screened out because it is locally serving; only the trip generation of the residential portion would be used to determine if the project meets the definition of a small project.
- **Redevelopment Project Screening Considerations:** The project is a redevelopment project that demonstrates that the proposed project's total project VMT is less than the existing land use's total VMT. Exception: If a project replaces affordable housing (either

deed restricted or other types of affordable housing) with a smaller number of moderate-income or high-income residential units, the project is not screened out and must analyze VMT impacts.

Projects that do not meet the above screening criteria must include a detailed evaluation of the VMT by the project. The significance threshold and specific VMT metric used to measure VMT is described by land use type. Based upon the project's land use designation as residential, the project's VMT would be evaluated as a residential project. The transportation VMT significance threshold for residential projects is at least 15 percent below regional VMT average/capita.

Project VMT Analysis

The following screening criteria from the City's TSM were utilized to determine if the project would be screened out from VMT Analysis:

- If it is located within a VMT efficient location per SANDAG Screening Map
- If it is considered a small project (<300 average daily weekday trips)
- If it is a 100% affordable housing project with level of affordability of 50% or less AMI

As the proposed land use of the site is multi-family residential, the project falls within the residential category for VMT purposes in which the threshold is based on VMT per Capita. For residential projects that are expected to generate less than 2,400 daily trips, the project's VMT per Capita is considered the same as the VMT per Capita of the census tract in which it is located.

The project's vehicular trip generation is expected to be approximately 1,362 Average Daily Trips (ADT) with 109 (22 inbound and 87 outbound) AM peak hour trips and 123 (86 inbound and 37 outbound) PM peak hour trips. Based on the screening criteria listed in the TSM, the project's trip generation exceeds the City's screening threshold of 300 average daily trips (ADT) for Small Projects; therefore, the project is not screened out from VMT analysis based on trip generation. Project trip generation is summarized in Table 3.

Table 3 Project Trip Generation															
Land Use	Quantity	DWY Rate ²	ADT ³	AM Peak Hour						PM Peak Hour					
				Peak Hr Rate	SPLIT		Volume			Peak Hr Rate	SPLIT		Volume		
					IN	OUT	IN	OUT	Total		IN	OUT	IN	OUT	Total
Multiple Dwelling	227	6	1,362	8%	20%	80%	22	87	109	9%	70%	30%	86	37	
Total 227.0				1,362			22	87	109				86	37	123
¹ DU = Dwelling Unit															
² Rates based on City of San Diego's Trip Generation Manual (May 2003).															
³ ADT = Average Daily Traffic															

Although the project consists of 227 affordable housing multi-family units, the level of affordability for the housing will range from 30% to 80% Area Median Income (AMI), where 10% of the units are proposed at 30% AMI, 10% of the units at 50% AMI, 50% of the units at 60% AMI and 30% of units at 80% AMI. This equates to 45 of the units below 50% AMI and the remainder 182 units ranging between 50% - 80% AMI. Based on the screening criteria listed in the TSM, the dwelling units that are

50% of AMI or less are presumed to have less than significant VMT impact and screened out of VMT Analysis. However, for the 182 dwelling units that are more than 50% AMI, these units are not screened out from performing VMT analysis.

According to Table 3 of the TSM, the City's VMT significance threshold for Residential use is at least 15% Below Regional Average VMT per Capita. SANDAG Series 14 (Base Year 2016) census tract VMT per Capita does not account for VMT-reducing Transportation Demand Management (TDM) strategies proposed by the project. Therefore, VMT reductions for TDM strategies that are proposed by the project as project features may need to be applied to the census tract VMT per Capita to determine the project's VMT. The project VMT is then compared to the significance threshold. The SANDAG San Diego Region SB 743 VMT Maps from the Traffic Forecast Information Center (TFIC) SB 743 VMT Web App provides the following information about census tract 96.04, in which the project site is located.

- San Diego County Series 14 (Base Year 2016) Regional Mean VMT per Capita: 19.0
- Project Site Census Tract VMT per Capita: 18.2
- Percent of Regional Mean VMT per Capita: 96.1%

Projects located in census tracts with higher than 16.2 VMT per Capita (85% of regional mean) are considered to be located in a VMT-inefficient area and are not screened out from VMT analysis. The census tract in which the project site is located is estimated to have 18.2 VMT per Capita, or 96.1% of the regional mean; therefore, the project site is not screened out from VMT analysis, and the 182 dwelling units at > 50% AMI would result in a significant VMT impact. To reduce the project VMT to below the 85% of the regional mean VMT, the project would need to reduce the VMT by at least 11.1%.

TDM Measures

Based on coordination with the City, TDM measures are not required by the CAP consistency checklist for residential projects. However, the VMT analysis has been prepared to evaluate TDM measures as mitigation for significant transportation VMT impacts. TDM strategies that are proposed by the project are described in detail in Table 4. Table 4 also provides the associated TDM strategy category, strategy type (primary or supportive), and maximum allowed VMT reduction for each strategy category. Each of the TDM strategies listed in Table 3 has an associated range of percent VMT reduction based on Appendix E of the City's TSM.

The TDM strategies are listed within their respective categories (4 categories total), and each category has a maximum VMT reduction percentage that can be applied for the combined effectiveness of that category. The four categories and their maximum VMT reductions are listed below:

- Neighborhood/Site Enhancement: 5% Without NEV; 15% With NEV maximum
- Parking Policy/Pricing: 20% maximum
- Transit System Improvements: 10% maximum
- Commute Trip Reduction Programs: 15% maximum

The effectiveness of multiple TDM strategies was calculated based on the equation used in the CAPCOA Quantification Report. Multiple TDM strategies within particular categories were calculated together to provide the maximum VMT reduction allowed for the category.

Appendix E of the City's TSM provides "Global Max Reductions" for the combined four categories based on geographic location of the project site within the City of San Diego according to urban area type. These "Global Max Reductions", which are listed below, would apply to TDM strategies that are recommended as mitigation measures rather than proposed as project features:

- Urban: 60% maximum
- Compact Infill: 30% maximum
- Suburban Center: 15% maximum
- Suburban: 10% maximum

The TSM does not specify which areas of the City of San Diego fall into the above-listed urban areas. Based on the location of the project site, the project would likely fall into a "Suburban Center" area type.

As shown in Table 4 the project's proposed VMT-reducing TDM strategies and improvements is expected to provide a total VMT reduction of approximately 3.85% based on the sum of the TDM categories per the CAPCOA Quantification Report equation.

Based on the project's total VMT reduction, the project's VMT per Capita is expected to be reduced to 17.53, or 92.25% of the regional mean. Accordingly, the project would continue to have a significant transportation VMT impact with the implementation of the TDM strategies proposed.

Table 4 TDM Measures – Project Features						
#	Proposed Project Improvement	Description	City of San Diego TDM Strategy	Strategy type	% VMT Reduction Per Strategy ²	Notes
NEIGHBORHOOD/SITE ENHANCEMENT CATEGORY						
1	Bicycle Infrastructure Improvements	The project will implement Class II bike lanes along the project frontage on Mission Gorge between Fairmount Avenue and Mission Gorge Place on both sides of street.	Bicycle TDM: Bicycle Infrastructure Improvements	Primary	1.55%	Max 5% reduction allowed for this category without Neighborhood Electric Vehicle (NEV)
2	Bicycle Infrastructure Improvements	The project will install bike loop detectors at Mission Gorge Road/Fairmount Avenue, Mission Gorge Road/Mission Gorge Place, and Mission Gorge Road/Twain Avenue intersections.	Bicycle TDM: Bicycle Infrastructure Improvements	Primary		

Table 4
TDM Measures – Project Features

#	Proposed Project Improvement	Description	City of San Diego TDM Strategy	Strategy type	% VMT Reduction Per Strategy ²	Notes
3	Bike Sharing Program	The project will provide on-site bike sharing (up to 4 bikes for tenant's short-term use on a reservation basis) to reduce vehicular trips	Bike Share-Micromobility Fleet	Primary	0.35%	
4	Pedestrian Network Improvements (Project Site Improvements)	The project will construct 10-foot wide contiguous sidewalk along the project site frontage along Mission Gorge Road.	Pedestrian/Walking TDM: Pedestrian Network Improvements	Primary	0.00%	
5	Pedestrian Network Improvements (Project Site Improvements)	The project will install a public trail access walkway through the site to connect to the future Alvarado Creek Trail as part of the future Alvarado Creek Improvement project	Pedestrian/Walking TDM: Pedestrian Network Improvements	Primary	1.00%	
6	Pedestrian Network Improvements	The project will install high visibility crosswalks for the northbound, southbound and westbound approaches and modify the traffic signal to include pedestrian countdown signal heads at the intersection of Mission Gorge Road/Mission Gorge Place	Pedestrian/Walking TDM: Pedestrian Network Improvements	Primary	1.00%	
7	Pedestrian Network Improvements	The project will install high visibility crosswalks at all four approaches and modify the traffic signal to include pedestrian countdown signal heads at Mission Gorge Road/Twain Avenue intersection	Pedestrian/Walking TDM: Pedestrian Network Improvements	Primary		
8	Pedestrian Network Improvements	The project will install high visibility crosswalks along the north, east and west	Pedestrian/Walking TDM: Pedestrian	Primary		

Table 4
TDM Measures – Project Features

#	Proposed Project Improvement	Description	City of San Diego TDM Strategy	Strategy type	% VMT Reduction Per Strategy ²	Notes
		approaches and modify the traffic signal to include pedestrian countdown signal heads at Mission Gorge Road/Vandever Avenue intersection	Network Improvements			
TOTAL PROJECT VMT REDUCTION¹ :					3.85%	

Source: Appendix E, City of San Diego Transportation Study Manual (September 29, 2020).

¹ Sum of TDM Category VMT reductions per the CAPCOA Quantification Report equation. CAPCOA Equation: Overall % VMT Reduction = $1 - (1 - A) * (1 - B) * (1 - C) * (1 - D) * \dots$ (A, B, C, D ... = individual TDM strategy VMT reduction percentages)

² Due to the project's location within a Transit Priority Area, the mid-range percentage values were applied to the proposed TDM strategies and improvements.

Mitigation Measures

Mobility Choices Program

As stated in the earlier section, since the project would continue to have a significant VMT impact after calculating VMT reductions due to project features, the project will opt in to participate in with the City's Complete Communities Mobility Choices Program for mitigation, and would rely upon the Findings and Statement of Overriding Considerations from the *Complete Communities: Housing Solutions and Mobility Choices Program FEIR* adopted on November 17, 2020. Per City's Mobility Choices Ordinance No. 21274 (dated December 9, 2020), the project is exempt from Mobility Choices Regulations because the project is a multi-family residential development in a Residential Parking Standards Transit Priority Area that provides the transportation amenities required by Section 142.0528 of the San Diego Municipal Code. However, the project will opt into the program, in efforts to mitigate significant VMT impacts to the extent feasible.

In the efforts to reduce VMT impacts to the extent feasible, the project will choose to participate in the Mobility Choices Program describe in detail below. Per the Ordinance, the City requires projects located in Mobility Zone 2 to provide VMT reduction measures totaling at least 5 points.

VMT reduction measures and associated points are listed in Appendix T of the Mobility Choices Implementation Guidelines. The project proposes pedestrian measures and bicycle supportive measures that can be applied towards reduction of project VMT. These are detailed in Table 4. As shown in Table 5, the project will provide VMT reduction measures that total 12.3 points, which meets the minimum requirement of the required 5 points for projects in Mobility Zone 2.

TABLE 5 VMT REDUCTION MEASURES – MOBILITY CHOICES OPT-IN					
#	VMT Reduction Measure	Description	Unit or Yes/No	Points /Unit	Notes
PEDESTRIAN MEASURES					
1	Installing high-visibility crosswalk striping adjacent intersection (if not otherwise required)	The project will install high visibility crosswalks for the northbound, southbound and westbound approaches at the intersection of Mission Gorge Road/Mission Gorge Place	Full Intersection	1.13	
2	Installing high-visibility crosswalk striping adjacent intersection (if not otherwise required)	The project will install high visibility crosswalks at all four approaches at Mission Gorge Road/Twain Avenue intersection	Full Intersection	1.50	
3	Installing high-visibility crosswalk striping adjacent intersection (if not otherwise required)	The project will install high visibility crosswalks along the north, east and west approaches at Mission Gorge Road/Vandever Avenue intersection	Full Intersection	1.13	
4	Signal pedestrian countdown heads (if not otherwise required)	The project will modify the traffic signal to include pedestrian countdown signal heads at the intersection of Mission Gorge Road/Mission Gorge Place Intersection	Each Intersection	2.00	
5	Signal pedestrian countdown heads (if not otherwise required)	The project will modify the traffic signal to include pedestrian countdown signal heads at Mission Gorge Road/Twain Avenue intersection	Each Intersection	2.00	
6	Signal pedestrian countdown heads (if not otherwise required)	The project will modify the traffic signal to include pedestrian countdown signal heads at Mission Gorge Road/Vandever Avenue intersection	Each Intersection	2.00	
7	Widening sidewalk within the existing public right-of-way to Street Design Manual Standards	The project will construct 10-foot wide contiguous sidewalk along the project site frontage along Mission Gorge Road.	Each mile of widening	0.04	3 points per mile
BICYCLE SUPPORTIVE MEASURES					
8	Providing onsite shared bicycle fleet	The project will provide on-site bike sharing (up to 4 bikes for tenant's short term use on a reservation basis)	Yes	1.50	
9	Installing new bicycle infrastructure (Class I, II, IV) that is part of the City's planned bikeway network that closes or incrementally closes an existing gap between existing bikeways	The project will construct Class II bike lanes along the project frontage on Mission Gorge between Fairmount Avenue and Mission Gorge Place on both sides of street.	Each mile	1.01	3 points per mile
TOTAL PROJECT VMT REDUCTION MEASURE POINTS				12.30	
Source: Appendix T, City of San Diego Mobility Choices Regulations (Ordinance No. 21274, Dated Dec 9, 2020).					

The project would result in significant VMT traffic and circulation impacts. Therefore, a Mitigation Monitoring Reporting Program, as detailed within Section VIII of the Addendum, would be implemented. With implementation of the monitoring program, potential impacts on transportation would be not be reduced to below a level of significance and impacts would be significant and unavoidable.

Based on the foregoing analysis and information, there are no changes in circumstances or new information identified above that would require a major change to the FPA PEIR. The project would not result in a new significant impact or a substantial increase in the severity of any significant impact identified in the FPA PEIR.

Air Quality and Odor

FPA PEIR

Section 5.3 of the FPA PEIR provides an analysis of air quality impacts associated with implementation of the FPA.

Issue 1 analyzed the FPA's consistency with the San Diego Air Pollution Control District's (SDAPCD) 2009 Regional Air Quality Strategy (RAQS) and the State Implementation Plan (SIP). The FPA PEIR concluded that the impact would be less-than-significant because the changes in land uses proposed under the FPA and the anticipated increase in residents would be within RAQS population forecasts.

Issue 2 analyzed the potential of the FPA to result in a violation of any air quality standard or contribute substantially to an existing or projected air quality violation. The FPA PEIR concluded that the impact would be less-than-significant regarding operational CO emissions and potentially significant regarding construction emissions. Under Issue 2, the FPA PEIR did not make a significance determination regarding operational emissions of air pollutants other than CO because the operational thresholds for these pollutants are meant to be applied on a project-specific basis. Thus, because the FPA PEIR is a program-level document, operational emissions of criteria air pollutants were based on the FPA's consistency with applicable air quality plans, discussed under Issue 1, rather than applying numeric thresholds. Regarding construction emissions, the FPA PEIR discussed how future development under the FPA would generate temporary air pollutant emissions primarily associated with fugitive dust (PM₁₀ and PM_{2.5}), exhaust emissions from heavy construction equipment, and ROG released during the drying phase of architectural coatings. Future development projects would be required to comply with construction-related regulations, including SDMC Section 142.0710, which requires watering of exposed soil at least twice daily during construction to reduce particulate matter emissions, and SDAPCD Rule 67.0, which provides standards for architectural coatings. The FPA PEIR included Mitigation Measure AQ-1, which requires best available control measures/technology to be implemented during construction activities if emissions would exceed thresholds established by the City. With implementation of Mitigation Measure AQ-1, the FPA PEIR concluded that the FPA would not result in the exceedance of air quality standards as a result of construction activities, and the impact would be reduced to a less-than-significant level.

Issue 3 analyzed the potential of the FPA to result in a cumulatively considerable net increase of any criteria pollutant for which the project region is designated non-attainment under a federal or State

ambient air quality standard. The FPA PEIR concluded that short-term (i.e., construction-related) cumulative impacts would be less-than-significant with future project compliance with SDAPCD regulations and the SDMC, including implementation of required construction BMPs. However, the FPA PEIR concluded that long-term (i.e., operational) cumulative impacts associated with emissions from mobile, area, and energy sources would be potentially significant because future development under buildout of the FPA would result in a net increase in emissions of ROG, PM₁₀, PM_{2.5}, and CO, which could potentially affect San Diego's ability to meet regional, State, and federal ambient air quality standards. The FPA PEIR included Mitigation Measure AQ-2, which requires projects that would significantly impact air quality, either individually or cumulatively, to develop and implement a Mitigation Monitoring and Reporting Program including all feasible mitigation to avoid, minimize, or offset the impact. Although future discretionary projects would be subject to environmental review and evaluated for consistency with applicable plans, policies, guidelines, and regulatory standards, the FPA PEIR concluded that not all future projects would be able to reduce operational emissions to below threshold levels. Therefore, cumulative long-term operational emissions of ROG, PM₁₀, PM_{2.5}, and CO resulting from future development within the FPA area would be significant and unavoidable.

Issue 4 analyzed the potential of the FPA to expose sensitive receptors to substantial pollutant concentrations, including toxic air contaminants. The FPA PEIR concluded that the impact would be less-than-significant with compliance with SDMC Section 142.0710, which prohibits air contaminants that endanger human health, cause damage to vegetation or property, or cause soiling to spread beyond the boundaries of the site from which they originate. Thus, future projects' compliance with SDMC Section 142.0710 would reduce the potential for pollutants to affect nearby sensitive receptors.

Issue 5 analyzed the potential of the FPA to cause particulate matter (dust) emissions greater than 100 pounds per day (lb/day). The FPA PEIR concluded that construction-related particulate matter (PM₁₀ and PM_{2.5}) emissions would be less-than-significant with future project compliance with SDAPCD regulations and the SDMC, including implementation of required construction BMPs. However, the FPA PEIR concluded that operational emissions of PM₁₀ would be potentially significant because daily operational emissions of PM₁₀ at buildout of the FPA would be approximately 294 lb/day. The FPA PEIR concluded that although implementation of Mitigation Measures AQ-1 and AQ-2, discussed above, would reduce particulate matter emissions, not all future projects would be able to reduce operational emissions of PM₁₀ to a less-than-significant level. Therefore, the FPA PEIR concluded that the impact regarding operational PM₁₀ emissions would be significant and unavoidable. The FPA PEIR also determined that additional mitigation measures may be required for future development on a project-specific basis.

Issue 6 analyzed the potential of the FPA to create objectionable odors affecting a substantial number of people. The FPA PEIR concluded that the mixed-use development that would occur under the FPA is not expected to create or emit objectionable odors. Therefore, the impact would be less-than-significant.

Overall impacts associated with Air Quality were determined to be significant and unmitigated.

Project

The air quality assessment was prepared in conformance with the City of San Diego mitigation framework. The RAQS is the applicable regional air quality plan that sets forth the San Diego Air

Pollution Control District's (SDAPCD's) strategies for achieving the National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS). The RAQS was updated in 2016 after certification of the FPA PEIR. The attainment/non-attainment statuses for the NAAQS and CAAQS in the San Diego Air Basin (SDAB) have not changed since certification of the FPA PEIR. Updates to the RAQS included an updated assessment of air quality trends in San Diego County, projected future emission reduction rates, control measures adopted since the 2009 RAQS, and an overview of incentive programs. Control measures adopted since the 2009 RAQS primarily apply to stationary sources (e.g., boilers, water heaters). The project would be required to comply with all applicable control measures in the most recent 2016 RAQS, such as District Rule 67.0.1, which regulates architectural coatings and District Rule 69.5.1, which regulates residential water heaters. The growth projections used by the SDAPCD to develop the RAQS emissions budgets are based on the population, vehicle trends, and land use plans developed in general plans and used by the San Diego Association of Governments (SANDAG) in the development of the regional transportation plans and sustainable communities strategy. As such, projects that propose development that is consistent with anticipated SANDAG growth projections would not conflict with the RAQS. The project site is designated Multiple Use and zoned CC-3-9 (Community Plan: Urban Village 44-109 DU/AC, Future Study Area) per the Navajo Community Plan. The project would be consistent with the existing land use and zoning designations. Therefore, the project would be consistent with RAQS growth projections and would not conflict with implementation of the RAQS. This impact would be less-than-significant.

Project construction would result in temporary emissions of criteria air pollutants and precursors associated with the use of off-road equipment, haul trucks delivering equipment and materials, and worker commute trips. Operational emissions generated by the project would come from area and energy sources (consumer products, landscape maintenance, architectural coatings, etc.), as well mobile sources (vehicle traffic). A project-specific Air Quality Assessment was prepared by ECORP Consulting to estimate construction and operational air pollutant emissions. The air quality modeling was conducted using California Emissions Estimator Model (Cameoed).

Tables 6 and 7 show that project-related construction and operational emission of criteria air pollutants and precursors would not exceed the SDAPCD thresholds of significance, which have not changed since certification of the FPA PEIR.

Table 6 Modeled Construction Emissions Compared to SDAPCD Thresholds						
Construction Year	Criteria Air Pollutants and Precursors (pounds per day)					
	ROG	NOx	CO	SO ₂	PM ₁₀	PM _{2.5}
Year 1	26.04	28.8	34.37	0.07	3.41	2.01
Year 2	25.76	26.32	33.74	0.07	3.25	1.6475
SDAPCD Significance Threshold	75	250	550	250	100	55
Exceed Threshold?	No	No	No	No	No	No
Source: Air Quality Assessment.						

Table 7 Modeled Operational Emissions Compared to SDAPCD Thresholds						
	Criteria Air Pollutants and Precursors (pounds per day)					
	ROG	NOx	CO	SO ₂	PM ₁₀	PM _{2.5}
Project Operations	8.20	13.63	31.60	0.12	9.53	2.83
SDAPCD Significance Threshold	75	250	550	250	100	55
Exceed Threshold?	No	No	No	No	No	No
Source: Air Quality Assessment.						

Because the project would not exceed daily construction or operational emissions thresholds, FPA PEIR Mitigation Measures AQ-1 and AQ-2 are not applicable to the project (these mitigation measures require project-level measures to avoid or reduce air pollutant emissions when SDAPCD thresholds are exceeded).

The Air Quality Assessment also addressed localized CO levels at roadway intersections near the project site that could experience increased traffic congestion as a result of the project. As discussed in the FPA PEIR, CO is a colorless, odorless, poisonous gas that can be found in high concentrations near areas of high traffic volumes, creating a "hot spot" where the California 1-hour standards of 20 ppm or the 8-hour standard of 9 ppm is exceeded. The Air Quality Assessment determined that CO levels would not locally exceed federal or State ambient air quality standards for CO because the project would generate 1,510 daily vehicle trips on average during a weekday; a project would have to generate at least 24,000 vehicle trips per hour at a single intersection for CO impacts to potentially be a concern. The project would not result in an exceedance of SDAPCD thresholds. For the reasons listed above, this impact would be less-than-significant.

The project would comply with SDAPCD and SDMC regulations and would implement BMPs during construction to reduce fugitive dust emissions, as required under SDMC Section 142.0710. In addition, the project would not exceed SDAPCD air pollutant thresholds for both construction- and operation-related emissions as described above. Thus, the project would not result in a cumulatively considerable net increase in criteria pollutants for which the SDAB is currently under federal and/or state non-attainment. FPA PEIR Mitigation Measure AQ-2 is not applicable to the project because this mitigation measure only applies to development that would significantly impact air quality. Therefore, this impact would be less-than-significant, and no mitigation would be required.

Sensitive receptors include schools and schoolyards, parks and playgrounds, daycare centers, nursing homes, hospitals, and residential housing. No existing sensitive receptors are located within the vicinity of the project site. As discussed in the FPA PEIR, project compliance with SDMC Section 142.0710 would reduce the potential for pollutants to affect nearby sensitive receptors. Therefore, because the project would not be located in close proximity to any sensitive receptors and would comply with SDMC Section 142.0710, it would not result in the exposure of sensitive receptors to substantial levels of pollution. This impact would be less-than-significant.

As shown in Tables 2 and 3, particulate matter emissions from project construction and operation would not exceed the SDAPCD threshold of 100 lb/day. In addition, the project would comply with SDAPCD and SDMC regulations and would implement BMPs during construction to reduce fugitive dust emissions, as required under SDMC Section 142.0710. As discussed above, FPA PEIR Mitigation

Measures AQ-1 and AQ-2 are not applicable to the project. Therefore, the impact related to particulate matter emissions would be less-than-significant, and no mitigation would be required. Being a residential development, the project does not include any uses that are typically associated with odor complaints. The project does not propose any uses or activities that would result in potentially significant operational-source odor impacts. In addition, there are no sensitive receptors in the vicinity of the project site. Therefore, the project is not expected to generate significant objectionable odors affecting a substantial number of people, and this impact would be less-than-significant.

Based on the foregoing analysis and information, there are no changes in circumstances or new information identified above that would require a major change to the FPA PEIR. The project would not result in a new significant impact or a substantial increase in the severity of any significant impact identified in the FPA PEIR.

Greenhouse Gas Emissions

FPA PEIR

Section 5.4 of the FPA PEIR provided an analysis of impacts related to greenhouse gas (GHG) emissions associated with the FPA.

Issue 1 analyzed the GHG emissions that would directly and indirectly result from FPA implementation. The FPA PEIR concluded that the impact would be less-than-significant because project design features that would be incorporated into future development and State reduction measures that apply to future development would reduce total annual GHG emissions by approximately 44.2%, which is more than the threshold of an at least 28.3% reduction. The project design features and State reduction measures referenced in the FPA PEIR are provided below.

Project Design Features to Reduce GHG Emissions

- On-site recycling program to achieve 50% landfill diversion
- Low flow plumbing fixtures
- Drought tolerant landscaping

State Measures for GHG Emissions Reductions

- Renewable Portfolio Standards (33% by 2020)
- Renewable Electricity Standard
- 2013 Title 24 Energy Code
- Assembly Bill 1493 Vehicle Regulations
- Medium/Heavy Duty Vehicle Regulations (Aerodynamic Efficiency and Vehicle Hybridization)
- Regional Transportation Related GHG Targets (SB 375)

Issue 2 analyzed the potential of the FPA to conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. The FPA PEIR concluded that the FPA would not conflict with the City's sustainable community program, Climate Protection Action Plan, General Plan, or Climate Action Plan (CAP) and, thus, would result in a less-than-significant impact. Overall impacts associated with Greenhouse Gas Emissions were determined to be less than significant.

Project

Subsequent to the adoption of the Grantville Focused Plan Amendment, the City adopted a Climate Action Plan (CAP) in December 2015 that outlines the actions that the City will undertake to achieve its proportional share of State GHG emission reductions. The City has identified the following CAP strategies to reduce GHG: energy- and water-efficient buildings; clean and renewable energy; bicycling, walking, transit, and land use; zero waste (gas and waste management); and climate resiliency. The CAP is a plan for the reduction of GHG emissions in accordance with CEQA Guidelines Section 15183.5. Pursuant to CEQA Guidelines Sections 15064(h)(3), 15130(d), and 15183(b), a project's incremental contribution to a cumulative GHG emissions effect may be determined not to be cumulatively considerable if it complies with the requirements of the CAP.

In order to ensure that future developments complies with the CAP, the City adopted a CAP Consistency Checklist, adopted July 12, 2016, which is the primary document used by the City to ensure a project-by-project consistency with the underlying assumptions in the CAP and thereby ensure that the specified emission reduction targets identified in the CAP are achieved. The Grantville Focused Plan Amendment identified various policies and recommendations aimed to reduce GHG emissions which support the City's reduction goals outlined in the CAP. Therefore, in keeping with those policies, the project would be required to comply with the CAP Consistency Checklist. Completion of the CAP Consistency Checklist and implementing the measures demonstrates consistency with the City's GHG CEQA thresholds to ensure that a project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment and would be consistent with the CAP (City of San Diego 2016). Compliance with the checklist supersedes the PEIR GHG mitigation measures and therefore a project-specific CAP Consistency Checklist was prepared.

CAP Consistency Checklist. The CAP Consistency Checklist includes a three-step process to determine if a project would result in a GHG impact. Step 1 consists of an evaluation to determine the project's consistency with existing General Plan, Community Plan, and zoning designations for the site. Step 2 consists of an evaluation of the project's consistency with applicable strategies and actions of the CAP. Step 3 is to determine whether a project with a land use and/or zone designation change within a Transit Priority Area would be consistent with the assumptions of the CAP. Step 3 would only apply if Step 1 is answered in the affirmative under Option B, which applies to projects that are not consistent with the existing land use plan and zoning designations, and would result in an increased density within a Transit Priority Area. The project completed the CAP Consistency Checklist (RECON 2020d) and its consistency is presented below.

Step 1: Land Use Consistency of the CAP Consistency Checklist determined that the project would be consistent with the existing General Plan and Community Plan land use designation of Business and International Trade, as well as the existing zoning designation of IBT-1-1 (International Business and Trade). Therefore, the project would be consistent with the growth projections utilized in the development of the CAP per Step 1 (A).

Step 2: CAP Strategies Consistency of the CAP Consistency Checklist determined that the project would be consistent with applicable strategies and action for reducing GHG emissions. This includes project features consistent with the energy and water efficient buildings strategy, as well as bicycling, walking, transit, and land use strategies. These project features would be assured as a condition of project approval. Therefore, the project would be consistent with the CAP.

Step 3: Project CAP Conformance Evaluation would only apply if Step 1 is answered in the affirmative under Option B. As previously disclosed above, the project is consistent with the General Plan and community plan and therefore answered in the affirmative to 1A. Thus, Step 3 does not apply to the project.

Under Step 1 of the CAP Consistency Checklist, the project is consistent with the existing General Plan and Navajo Community Plan land use designations and zoning on the site. Therefore, the project is consistent with the growth projections and land use assumptions utilized in the CAP. Furthermore, as outlined in footnote 5, Step 2 of the CAP Consistency Checklist, the project would not result in the expansion or enlargement of a building and would not result in any new occupancy buildings, therefore Step 2 would not be applicable. Step 3 of the CAP Consistency Checklist would not be applicable, as the project is not proposing a land use amendment or rezone.

Based on the project's consistency with the City's CAP Consistency Checklist, the project's contribution of GHGs to cumulative statewide emissions would be less than cumulatively considerable. Therefore, the project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs, or generate GHG emissions that may adversely affect the environment, and impacts would be less than significant.

Based on the foregoing analysis and information, there are no changes in circumstances or new information identified above that would require a major change to the FPA PEIR. The project would not result in a new significant impact or a substantial increase in the severity of any significant impact identified in the FPA PEIR.

Noise

FPA PEIR

Section 5.5 of the FPA PEIR provides an analysis of construction and operational (i.e., traffic) noise impacts associated with implementation of the FPA.

Issue 1 addressed exposure of sensitive receptors to short-term construction noise and long-term traffic noise. The FPA PEIR identified a potentially significant impact for the exposure of sensitive receptors to construction noise. The FPA PEIR explained that few noise-sensitive receptors exist in the FPA area because the land uses are primarily industrial and commercial. However, the FPA would allow construction of new residential land uses and other noise-sensitive land uses (e.g., daycares, hotels). The severity of construction noise impacts would vary depending on the scope and location of specific projects, the type of surrounding uses, and the proximity of sensitive receptors. The FPA PEIR concluded that compliance with construction noise standards in the San Diego Municipal Code and implementation of Mitigation Measures N-1 through N-5 would reduce construction noise impacts to a less-than-significant level.

Regarding exposure of sensitive receptors to long-term traffic noise, the FPA PEIR identified a potentially significant impact along Fairmount Avenue between Vandever Avenue and Twain Avenue because future traffic noise levels would increase by at least 3 dBA. The FPA PEIR did not identify a potentially significant long-term traffic noise impact along any other roadway segment in the FPA. The FPA PEIR concluded that implementation of Mitigation Measures N-1 through N-6 would reduce this operational traffic noise impact along the northern segment of Fairmount Avenue to the extent feasible but would not be able to fully mitigate the impact to a less-than-significant level.

Mitigation Measure N-1 requires development of a noise study to evaluate noise impacts; Mitigation Measure N-2 provides restrictions and requirements for the operation of construction equipment; Mitigation Measure N-3 limits the number of large pieces of construction equipment that can operate at once adjacent to a sensitive receptor; Mitigation Measure N-4 requires that neighbors are notified before noise-generating activity; Mitigation Measure N-5 requires the development of a Noise Control Plan; and Mitigation Measure N-6 requires development projects involving new residential uses to incorporate noise-attenuating setbacks, design features, and materials into the project to achieve the 45 dBA interior standard for habitable rooms as required by the City.

Issue 2 analyzed the potential of the FPA to result in a substantial increase in existing ambient noise levels. The FPA PEIR identified a potentially significant impact related to an increase in ambient noise levels because buildout under the FPA could result in a substantial increase in the existing ambient noise levels exceeding 3 dBA on the segment of Fairmont Avenue from Vandever Avenue to Twain Avenue, as discussed in Issue 1. Same as in Issue 1, the FPA PEIR concluded that implementation of Mitigation Measures N-1 through N-6 would reduce the ambient noise level increase from traffic along the northern segment of Fairmont Avenue to the extent feasible but would not be able to fully mitigate the impact to a less-than-significant level. Therefore, the FPA PEIR concluded that the impact would be significant and unavoidable.

Overall impacts associated with Noise were determined to be significant and unmitigated.

Project

Construction Noise

A project-specific Noise Impact Assessment was prepared by ECORP Consulting to assess both construction and operational noise impacts. Preparation of the Noise Impact Assessment has satisfied the requirements of Mitigation Measure N-1. Section 59.5.0404 of the SDMC prohibits disturbing, excessive, or offensive construction noise occurring between the hours of 7:00 p.m. and 7:00 a.m. or on legal holidays and Sundays, unless a permit has been applied for and granted beforehand by the Noise Abatement and Control Administrator. Additionally, Section 59.5.0404 of the SDMC prohibits any construction activity that causes a noise level of 75 dBA L_{eq} or louder from 7:00 a.m. to 7:00 p.m. at or beyond the property lines of any property zoned residential. Project construction would occur from 7:00 a.m. to 7:00 p.m. and would be prohibited on legal holidays and Sundays, pursuant to SDMC Section 59.5.0404. Results of the noise modeling demonstrate that no construction equipment would individually or cumulatively exceed the City's construction noise threshold of 75 dBA L_{eq} at any property zoned residential. The nearest residential zoned properties are located approximately 1,500 feet from the property to north and south of I-8. Therefore, construction noise impacts would be less-than-significant. Because no mitigation would be needed to reduce construction noise impacts, implementation of the FPA PEIR mitigation measures regarding construction noise are not required for the project.

Land Use Compatibility

The roadway segment on Fairmont Avenue from Vandever Avenue to Twain Avenue is 0.22 miles away at the closest intersection to the project site (Fairmont Avenue and Twain Avenue) and several industrial and commercial buildings separate this roadway segment from the project. Thus, occupants of the project would not be exposed to traffic noise from this segment of Fairmont Avenue, which was the only segment with a significant long-term traffic noise impact identified in

the FPA PEIR. The Noise Impact Assessment determined that the project would result in an increase of approximately 1,234 average trips per day, which would not result in a doubling of traffic on Mission Gorge Road or any other roadways. Therefore, the project would not result in a perceptible change to existing traffic noise levels. In addition, the project site is located outside of any airport land use plan and would not expose people working or residing in the project area to excessive aircraft noise levels.

The City of San Diego General Plan provides a land use compatibility table, which identifies compatible, conditionally compatible, and incompatible exterior noise exposure for various land uses. For multi-family housing, the compatible exterior noise exposure standard is 60 dBA CNEL or less, and the conditionally compatible exterior noise exposure standard ranges from 61 to 70 dBA CNEL. In order for multi-family housing development that lies within the conditionally compatible range to qualify as a conditionally compatible project, building structures must also demonstrate that the interior noise level would not exceed 45 dBA CNEL.

According to the Noise Impact Assessment the existing noise level (62.2 dBA) falls within conditionally compatible noise exposure level (61 to 70 dBA CNEL). Implementation of FPA PEIR Mitigation Measure N-6 would ensure that an interior noise level of 45 dBA CNEL is achieved by requiring the use of various sound attenuation techniques as prescribed in the California Energy Code Title 24 standards (e.g., sound attenuating building materials, sound barriers, setbacks). The Noise Impact Assessment identifies new mitigation measure N-1 to implement FPA PEIR Mitigation Measure N-6. As described above, preparation of the Noise Impact Assessment has already satisfied the requirements of FPA PEIR Mitigation Measure N-1. FPA PEIR Mitigation Measures N-2 through N-5 all relate specifically to construction noise and, thus, are not applicable to this land use compatibility impact. Therefore, implementation of FPA PEIR Mitigation Measure N-6 (by implementing mitigation measure N-1 from the Noise Impact Assessment) would reduce the impact to a less-than-significant level.

A Mitigation Monitoring Reporting Program (MMRP), as detailed within Section VIII of the Addendum is required. With implementation of the monitoring program, potential noise impacts be reduced to below a level of significance.

Based on the foregoing analysis and information, there are no changes in circumstances or new information identified above that would require a major change to the FPA PEIR. The project would not result in a new significant impact or a substantial increase in the severity of any significant impact identified in the FPA PEIR.

Biological Resources

FPA PEIR

Section 5.6 of the FPA PEIR provides an analysis of biological resource impacts associated with the FPA.

Issue 1 evaluated the potential of the FPA to result in a substantial adverse impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in the MSCP or other local or regional plans, policies, or regulations, or by the CDFW or USFWS. The FPA PEIR concluded that the impact would be potentially significant because direct impacts could potentially occur as a result of future development activities (e.g., disturbing nesting

habitat), and indirect impacts could include increased edge habitat (i.e., habitat that borders development), night illumination of vegetation communities, and increased human interaction within wildlife corridors. The FPA PEIR explained that due to the programmatic nature of the analysis, it is not possible to determine specific impacts to sensitive species that would occur from future development projects in the FPA area, and future development activities would need to be evaluated on a project-specific basis. The FPA PEIR concluded that implementation of Mitigation Measures BR-1 through BR-5 would reduce the impact to a less-than-significant level.

The Grantville FPA specifies that mitigation would apply to projects that result in impacts that are considered significant under the City of San Diego's Biology Guidelines and the City's CEQA Significance Determination Thresholds. Mitigation Measure BR-1 requires all subsequent projects within Community Plan Implementation Overlay Zone (CPIOZ) Type B areas to be analyzed in accordance with the CEQA Significance Thresholds, which require that site-specific biological resource surveys be conducted in accordance with the City of San Diego Biology Guidelines. Mitigation Measure BR-2 requires future projects that result in impacts to sensitive upland Tier I, II, IIIA, or IIIB habitats to implement avoidance and minimization mitigation measures consistent with the City Biology Guidelines and MSCP Subarea Plan. Mitigation Measure BR-3 explains that relevant measures for mitigating impacts to sensitive species are provided elsewhere in LU-1 and BR-1 through BR-5. As discussed in the Land Use section, Mitigation Measure LU-1 requires that all future actions undertaken at or near the San Diego River or adjacent to the MHPA be reviewed for consistency with all applicable MSCP requirements and MHPA Land Use Adjacency Guidelines. Mitigation Measure BR-4 addresses impacts to wetlands and requires all subsequent projects to comply with USACE Clean Water Act Section 404 requirements and special conditions, CDFW Section 1602 Streambed Alteration Agreement requirements and special conditions and the City of San Diego Environmentally Sensitive Lands (ESL) Regulations for minimizing impacts to wetlands. Mitigation Measure BR-5 addresses impacts to migratory wildlife and wildlife corridors and requires that the biological resources survey required under Mitigation Measure BR-1 includes mitigation that reduces impacts that would interfere with the nesting, foraging, or movement of wildlife species.

Issues 2 and 3 are combined, and together they evaluated the potential of the FPA to result in a substantial impact on wildlife habitat and sensitive natural communities, including wetlands. Substantial adverse impacts on wetlands include but are not limited to direct removal, filling, and hydrological interruption. The FPA PEIR concluded that from impact on wildlife habitat and sensitive natural communities, including wetlands would be potentially significant because future development projects would potentially have direct and indirect impacts on Tier I through III vegetation communities, as well as wetlands and other sensitive vegetation communities identified by the USFWS and/or CDFW. However, the FPA PEIR concluded that impacts to certain vegetation communities, including landscape plantings of horticultural specimens along roads and interchanges and disturbed land that lacks vegetation or supports only non-native vegetation, would be less-than-significant. The FPA PEIR explained that future development activities would need to be evaluated on a project-specific basis and determined that implementation of Mitigation Measures BR-1 through BR-5, described above, would reduce potential impacts to wildlife habitat and sensitive natural communities, including wetlands, to a less-than-significant level.

Issue 4 evaluated if the FPA would substantially interfere with the movement of any native resident or migratory fish or wildlife species; interfere with established native resident or migratory wildlife corridors, including linkages identified in the MSCP Plan; or impede the use of native wildlife nursery

sites. The FPA PEIR concluded that the impact would be potentially significant because future development projects could have direct and/or indirect impacts to the regional wildlife corridor that links Mission Trails Regional Park with Mission Bay Park, such as increased nighttime illumination and human intrusion. However, the FPA PEIR explained that future development activities would need to be evaluated on a project-specific basis, and future activities would be required to comply with the Multi-Habitat Planning Area (MHPA) Land Use Adjacency Guidelines of the Multiple Species Conservation Program (MSCP) Subarea Plan. With implementation of these regulations and Mitigation Measures BR-1 through BR-5, described above, the FPA PEIR determined that the impact would be reduced to a less-than-significant level.

Issue 5 evaluated the FPA's consistency with local, regional, and state plans that protect wildlife habitat. The FPA PEIR concluded that the impact would be potentially significant because the FPA would have the potential to result in direct and indirect impacts to MHPA lands. The FPA PEIR explained that the in-depth analysis for this impact is included in Section 5.1, "Land Use," which concluded that the impact would be reduced to a less-than-significant level with implementation of Mitigation Measure LU-1. Mitigation Measure LU-1 requires that all future actions undertaken at or near the San Diego River or adjacent to the MHPA be reviewed for consistency with all applicable MSCP requirements and MHPA Land Use Adjacency Guidelines.

Issue 6 evaluated the potential of the FPA to result in the introduction of invasive plant species into natural open space. The FPA PEIR concluded that the impact would be potentially significant because while direct impacts are not anticipated as a result of FPA implementation, indirect impacts could occur due to an increase in edge habitat or disturbance or removal of native vegetation communities. However, the FPA PEIR determined that implementation of Mitigation Measure LU-1, described above, would reduce the impact to a less-than-significant level.

Issue 7 evaluated the potential of the FPA to result in discharging into receiving waters with Environmentally Sensitive Lands or water bodies. The FPA PEIR concluded that the impact would be less-than-significant because future projects would be required to adhere to the requirements of the Regional Water Quality Control Board (RWQCB) and San Diego Municipal Code (SDMC), including the requirements of the MS4 permit for the San Diego Region and the City's Storm Water Standards Manual; implementation of BMPs, and compliance with the California BMP Handbook.

Temporary and permanent impacts terminology is utilized through the biological resources discussion to distinguish permanent structures and project features compared to areas that would be vegetated following Project implementation. However, the City requires that temporary impacts be mitigated as permanent impacts.

Overall impacts associated with Biological Resources were determined to be mitigated to less than significant.

Project

Consistent with the mitigation framework, a site-specific Biological Survey Report (BSR), Habitat Mitigation and Monitoring Plan (HMMP), Long Term Management Plan (LTMP) and Project Analysis Record (PAR) were prepared by Blackhawk Environmental and Schaefer Ecological Solutions. . Literature and database search, and field surveys were conducted within the project boundary and included a one-mile buffer (extending out from the project boundary) to assess the vegetation communities and species on site and determine what impacts would result through project implementation.

The field surveys, identified a total of 25 wildlife species and 57 plant species (36 non-native) were observed on or within the vicinity of the project site, none of which are State or federally listed and/or on the MSCP narrow endemic species list. Many of the species observed are common to the region and are to be expected in terrestrial and aquatic habitats present in the survey area. The Biological Survey Report identified six vegetation communities/land cover types within the project site: Urban/Developed Area (6.05 acres), Disturbed Lands (1.87 acres), Arundo-dominated Wetland (0.29 acres), Non-native Riparian (0.26 acres), Disturbed Wetland/Non-vegetated Channel (0.21 acres), and Southern Riparian Woodland (0.11 acres). Vegetated land is concentrated along Alvarado Creek.

No MCSP, narrow endemic, federally listed, state listed, or CNPS listed plant species were documented within the survey area. Three special status wildlife species have low potential to occur within the survey area: Cooper's hawk (*Acipiter cooperii*), yellow warbler (*Setophaga petchia*), and Southern California legless lizard (*Anniella stebbinsi*). Of these species, only Cooper's hawk is covered by the MSCP, and yellow warbler and California legless lizard are considered Species of Special Concern (SSC) by the State. All other special-status wildlife species, including those covered by the MSCP, are presumed absent from the project site. Due to low potential for occurrence of special-status species, direct and indirect impacts to special status species would be less-than-significant. Regarding direct impacts to sensitive habitat, construction of the project would result in temporary loss and short-term disturbances to 0.213 acres of environmentally sensitive lands and 0.070 acres of permanent impact, as summarized in Table 8.

Vegetation Community/ Land Use Type	Impact	
	Temporary (Acres)	Permanent (Acres)
Disturbed Land (Tier IV)	0.233	0.036
Urban/Developed Area (Tier IV)	0.030	2.270
Subtotals: Tier IV Communities	0.263	2.306
Arundo-dominated Wetland	0.060	0.047
Disturbed Wetland/Un-vegetated Channel	0.002	0.008
Non-native Riparian	0.137	0.015
Southern Riparian Woodland	0.014	0.000
Subtotals: Environmentally Sensitive Lands (Wetlands)	0.213	0.070
TOTAL	0.046	2.376

Temporary impacts are associated with construction buffers for construction of the housing development, grading to increase the capacity of the 100-year floodplain of Alvarado Creek, and installation of new stormwater facilities and sewer connections. The project would result in approximately 2.376 acres of permanent habitat loss associated with the permanent footprint of the project. No sensitive upland vegetation communities designated (i.e., Tier I, Tier II, and Tier IIIA) would be impacted. However, the project would result in direct impacts to a total of 0.283 acres (0.213 acres of temporary impacts and 0.070 acres of permanent impacts) of City wetland/ESL habitat (Table 9).

Table 9 Summary of Proposed Project Impacts to Jurisdictional Resources		
Jurisdictional Waters	Impacts Acres (Linear Feet)	
	Temporary	Permanent
USACE Jurisdiction		
Wetland Waters of the U.S.	0.051	0.012
Non-Wetland Waters of the U.S.	0.002 (5)	0.008 (21)
Likely USACE Total Jurisdiction	0.053	0.030
RWQCB Jurisdiction		
Wetland Waters of the State	0.051	0.012
Non-Wetland Waters of the State	0.002 (5)	0.007 (21)
Likely RWQCB Total Jurisdiction	0.053	0.020
CDFW Jurisdiction		
Riparian Only	0.160	0.050
Streambed (Bank-to-Bank)	0.053 (5)	0.020 (21)
Likely CDFW Total Jurisdiction	0.213	0.070
City Wetland		
City Wetland	0.213	0.070
Total City Wetlands Areas	0.213	0.070

Impacts to wetlands from the project would require deviations from the ESL Regulations. The project qualifies for deviations under the Biologically Superior Option (BSO). In order to qualify under the BSO, a project deviating from wetland regulations must meet the four described below:

1. *Fully describe and analyze a no project alternative, a wetlands avoidance alternative, and a biologically superior alternative demonstrating that the proposed project would result in the conservation of a biologically superior resource compared to strict compliance with the provisions of the ESL;*

No Project Alternative

Under the no project alternative, the Project would not be constructed and no impacts to wetlands would occur, accounting for an overall reduction of 0.254 acre of impacts to wetlands. The widening and recontouring of the Alvarado Creek channel to increase capacity would also not occur. The site would remain in its current condition with developed commercial and industrial operations occurring directly adjacent to City wetland areas with no functional buffer. Wetlands on site would most likely continue to sustain regular human disturbances through unregulated stormwater discharge, dumping and encampments. Furthermore, without widening of the channel, flow velocities would remain high, resulting in sediment loading, scouring and routine flooding of the areas which generally limit the quality of the on-site wetlands and downstream areas. Additionally, the on-site wetland restoration (0.229 acre), enhancement (0.201 acre) and creation (0.186 acre) proposed as mitigation for this project would not occur and non-native species would likely continue to dominate the majority of the site.

Wetland Avoidance Alternative

Under the wetland avoidance alternative, all (0.254 acre) City wetland areas would be avoided (Figure 6). The Tier IV upland areas of the Project would be developed, but core elements of the

proposed Project would not be completed, including the installation of stormwater outfalls, increased capacity of the Alvarado Creek channel and connection to underground sewer lines south of Alvarado Creek. Without connection to existing sewer south of Alvarado Creek, critical components of the project would be eliminated, and the proposed Project would not be feasible. Without recontouring and grading of the southern bank of Alvarado Creek to increase capacity, the site will continue to sustain periodic flooding and the Project would not be feasible. The avoidance alternative also would forgo 0.186 acre of wetland creation as a component of mitigation for impacts to wetlands areas.

Biologically Superior Option

Conservation of a Biologically Superior Resource: The proposed Project would impact approximately 0.254 acre of City wetland habitat. However, the proposed Project proposes to create, retore, enhance, and ultimately conserve a total of 0.615 acre of wetlands of higher quality than those which currently exist on site, resulting in a net increase of approximately 0.362 acres of a biologically superior resource.

Wetland Buffers: Existing conditions on the Project site include the direct abutment of developed impervious concrete areas and commercial work activities to City wetland habitats. This interface has resulted in no existing functional buffer between the wetlands and existing development. Further, these conditions do not provide management for urban runoff and contribute to the direct discharge of run-off from the surrounding developed areas directly to Alvarado Creek. The Project provides a Biologically Superior Option through the creation of wetland buffers ranging from 21 to 49 feet in width. The proposed Project will incorporate native upland landscaping between the development and new community trail and proposed wetland areas. Landscaping would incorporate components of both coastal sage scrub and chaparral communities to form a more natural upland transitional zone above the wetland areas. These landscaped buffer areas will be managed as part of on-site landscaping, with a continuation of unmaintained native upland landscaping for the remaining buffer between the community trail and the creek. These upland areas are not proposed as upland mitigation. Unmaintained uplands between the community trail and creek will provide additional physical and visual buffers between development and the wetlands. Wetland mitigation areas planned for management and maintenance will be delineated by a fence located between the trail and wetland mitigation areas, which will prevent encroachment of management activities on wetlands as well as create a physical barrier for human encroachment

2. *Demonstrate that the wetland resources being impacted by the project shall be limited to wetlands of low biological quality.*

In accordance with the City's Biology Guidelines, in order to determine if a project is the Biologically Superior Option, the project must demonstrate that the wetlands proposed to be impacted are of low biological quality. Below provides the Project-specific discussion of on-site wetland quality as evaluated using each of the prescribed City criteria and Section 320.4(b)(2) of USACE 33CFR 320.

- a. *Use of the wetland by federal and/or state endangered, threatened, sensitive, rare and/or other indigenous species.*

The site was evaluated for potential federal and/or state endangered, threatened, sensitive, rare and/or other indigenous species to occur on site. Based on the condition of City wetlands proposed for impacts and isolation from surrounding contiguous wetland areas, the site is not expected to

support sensitive species and sensitive species were not observed. Further discussion of the factors contributing to degradation of wetland quality based on hydrological regime and water quality which have resulted in sensitive species not being expected to occur are provided in items 6 through 8, below.

- b. Diversity of native flora and fauna present (characterizations of flora and fauna must be accomplished during the proper season, and surveys must be done at the most appropriate time to characterize the resident and migratory species).*

During the 2020 surveys, an array of both native and non-natives species was observed. The majority of these species were upland- or disturbance-adapted resident avian species observed to utilize the wetland and adjacent disturbed habitats for foraging (e.g. California towhee, bushtit, house finch and northern mockingbird). Occasional wetland-associated species such as belter-kingfisher, great blue heron and mallard were observed utilizing the site for foraging. However, these species are generally associated with open water/aquatic habitat types utilized for foraging. Overall, the site was not observed to support wildlife species associated with riparian habitats (e.g. riparian scrub, riparian forest, emergent wetlands, etc.) The majority of habitat value contributed by aquatic habitats resulting from perennial water sources but limited by disturbance. Native vegetation diversity was observed to be low, with large portions of the wetland habitats dominated by monotypic giant reed, which provides negligent habitat value to native riparian species. Where native riparian canopy persists, the quality of habitat has been degraded by the establishment of non-native sub-canopy and understory of herbaceous and woody shrub species (e.g. smilo grass, castor bean, pampas grass, umbrella sedge, etc.).

- c. Enhancement or restoration potential.*

The wetlands proposed for impacts by the Project are comprised primarily of non-native riparian and Arundo-dominated wetland habitats. While the site has enhancement and restoration potential, the wetlands here would be considered relatively low quality. Following construction of the Project, these areas are proposed for restoration with higher quality native wetlands. By implementing the proposed Project impacts, the on-site restoration potential would be improved as the increased channel width provides the opportunity for an additional 0.186 acre of wetland habitat creation from disturbed upland habitats.

Existing habitats along the north channel slope of Alvarado Creek are comprised of 50 to 100 percent cover of non-native species. These areas would not be impacted but enhanced by the Project through the removal of non-native species and revegetation with native species as part of the proposed Habitat Restoration Plan (Blackhawk 2021).

- d. Habitat function/ecological role of the wetland in the surrounding landscape, considering – the current functioning of the wetland in relation to historical functioning of the system; and – rarity of the wetland community in light of the historic loss and remaining resource.*

The wetlands proposed for Project impacts serve little ecological function when to historic function or undisturbed riparian communities of the region. The low function of the site is a result of a poorly developed sub canopy comprised primarily of non-native and/or invasive species. In particular, the site is unlikely to support nesting riparian associated bird species such as yellow warbler or least Bell's vireo. These areas are largely isolated from the surrounding riparian areas of the region due to

undergrounding and lining of other reaches of Alvarado Creek upstream and downstream of the Project, which has fragmented and degraded on-site habitat. The site does not contribute significant ecological functions such as food chain production, general habitat, spawning or rearing and nesting sites.

Historically, the creek meandered within the valley dispersing hydrology over a much wider area. However, development within the larger San Diego River Valley region has resulted in channelization of the San Diego River and its tributaries, such as Alvarado Creek. This channelization on site causes high volume periodic flooding which in turn creates scouring and removal of vegetation to a greater degree than would naturally occur. These scouring events are likely the cause of the relatively underdeveloped riparian community.

In historical context, the loss of large portions of natural wetland and riparian communities within the San Diego River Valley and tributaries has increased the importance of maintaining and preserving the remaining fragments. Although the wetlands on-site are of low ecological function than otherwise undisturbed or natural communities, this historic loss of habitat means that any loss of wetlands would be considered significant. However, in the absence of the Project these areas would continue to function with low ecological value.

- e. *Connectivity to other wetland or upland systems (including use as a stopover or stepping-stone by mobile species), considering – proximity of the wetland resource to larger natural open spaces, and – long-term viability of resource, if avoided and managed.*

The Project site has been ecologically isolated from larger surrounding riparian communities of the region as a result of channel lining, undergrounding and routine vegetation maintenance both up and downstream. Although the site is located approximately 0.31 miles west of larger riparian habitats associated with the San Diego River, the creek west of the site has been lined with concrete for an approximately 0.25-mile reach, which has eliminated riparian habitat connectivity.

If avoided and managed, the channel would not be widened, and the creek would continue to sustain high velocity and high-volume flooding events. Over time, these events would be expected to continually remove riparian understory at regular intervals as well as occasionally cause destruction of the few remaining relic native tree species that persist on site. As these species/individuals are removed it is likely that the site would continue to recruit *Arundo* and other non-native species more adapt to disturbed environments, and site degradation would increase. These factors reduce long-term viability of the site.

- f. *Hydrologic function, considering – whether the volume and retention time of water within the wetland is sufficient to aid in water quality improvements, and – whether there is significant flood control value or velocity reduction function; and – whether there is an opportunity to restore the hydrologic functions.*

The current condition on the site is not conducive to water retention, and therefore water purification functions, or flood management. Surrounding development has resulted in heavy channelization of the creek, including in upstream and downstream reaches. The constricted nature of the creek results in high velocity flow. Furthermore, portions of the creek have been lined with concrete, creating impervious surfaces.

- g. *Status of watershed considering whether the watershed is partially developed, irrevocably altered, or inadequate to supply water for wetland viability.*

The San Diego River Watershed, which includes Alvarado Creek, is partially developed, primarily in the western downstream portion of the watershed. These areas include those surrounding the Project within the Mission Valley area. The watershed maintains adequate water supply to sustain wetland community viability in the downstream reaches of the watershed. However, tributaries of the main river system have been irrevocably altered through portions of the watershed through concrete lining and channelization. Restoration of these areas would require substantial grading to restore natural function.

- h. *Source and quality of water, considering – whether the urban runoff is from a partially developed watershed; – whether the water source is in part or exclusively from human- caused runoff which could be eliminated by diversion; and – whether there is an opportunity to restore the water quality or flood control value.*

Urban runoff from Mission Gorge Road and the developed parcels north of the wetlands are responsible for the majority of hydrologic input to Alvarado Creek within the Project site. Upstream hydrologic input is provided by urban runoff from similar areas include Mission Gorge Place and Alvarado Canyon Road. Due to the majority of hydrology occurring from urban runoff and anthropogenic sources, the water quality is presumed poor.

The Project will update storm water systems to improve storm water run-off water quality originating from within the site. The Project will also increase flood capacity, reduce flow velocity, and remove impervious surfaces, which are expected to increase wetland function and improve water quality by reducing erosion and sediment loading and increasing water retention time. Anthropogenic water sources both within and upstream of the Project have the potential to be eliminated in the future as a result in updates to stormwater facilities, as well as overall run-off reduction through reductions in irrigation of surrounding areas. Such changes would result in elimination and/or reductions in water sources which could modify existing wetlands on site. In the event that water sources are reduced, water quality would likely remain low due to sources from urban run-off.

As discussed in item 6, above, on site wetlands afford opportunities to restore water quality and flood control functions through proposed reductions in flow velocities via channel widening and habitat restoration.

3. *Demonstrate that the project and associated mitigation conform to the requirements for this option that include avoidance, minimization, and compensatory measures which would result in a biologically superior net gain in overall function and values of the type of wetland resource being impacted and/or the biological resources to be conserved.*

As previously identified, the City does not distinguish between temporary and permanent impacts, and therefore impacts to habitats would be mitigated as permanent impacts and require mitigation in accordance with Table 2a of the Biology Guidelines at a 2:1 ratio for wetland impacts. Thus, total impacts to 0.254 acre of City wetlands would be mitigated through 0.508 acre of mitigation. A minimum of 1:1 ratio (0.254 acre) of the overall 2:1 mitigation is required to occur either via creation or restoration, with the remaining 1:1 provided through a combination of either creation,

restoration, and/or enhancement. Total mitigation required to offset Project impacts is detailed in Table 10.

The Project would be required to implement on-site restoration and habitat creation. Proposed new channel slopes would be vegetated with native wetland/riparian species and/or natural channel bottom substrate to provide a total of 0.183 acre of on-site habitat creation, which would provide mitigation in the form of creation for impacts to 0.238 acre of wetland at a 0.7:1 ratio. An additional 0.068 acre of restoration via the revegetation of proposed temporary impacts to existing City wetland areas would be provided to fulfill on-site mitigation requirements at a 1:1 ratio for no-net loss.

The Project also proposes 0.161 acre of additional restoration of impacts to City wetlands. This would provide mitigation in the form of restoration for 0.254 acre of wetlands at a ratio of 0.6:1. An additional 0.235 acre of existing wetland habitat within the site would be included as an "enhancement" area. Within 0.235 acre, it was determined that 0.201 acre is available for mitigation through enhancement, providing mitigation for 0.254 acre of impacts to wetlands at a ratio of 0.8:1. Within the enhancement area, the acreage available for mitigation is based on the percentage of invasive/weed species relative to total cover. The invasive/weed coverage percentage in these areas relative to the total area was considered to determine the total acreage available via enhancement on site. This combination of restoration and enhancement will provide mitigation at a 1.4:1 ratio thereby exceeding on-site mitigation requirements.

The total combination of on-site habitat creation, restoration and enhancement is expected to total 0.599 acre of wetland habitat, in excess of a 2:1 ratio to offset impacts to City wetland areas resulting from the Project. A Habitat Mitigation Monitoring Plan (May 2022) has been prepared and developed detailing proposed mitigation approach, target habitat types, monitoring, weed management, success criteria and reporting.

Lastly, consistent with the City's Biology Guidelines, the project would implement a long-term management plan to guide the long-term management of the Project's 0.599-acre onsite habitat mitigation site and would commence upon the five-year post-restoration acceptance. The purpose of this LTMP is to ensure that the conserved Mitigation Site is managed, monitored, and maintained in perpetuity to preserve biological and wetlands functions and values along with any sensitive biological resource they support.

4. Obtain concurrence from the USFWS and the CDFW (Wildlife Agencies).

A BSO Concurrence meeting was conducted with the Wildlife Agencies (USFWS and CDFW) on January 21, 2022, and additional wetland buffering in the form of trail relocation, fencing and additional restoration planting was requested. The trail relocation, fencing and additional vegetation buffering (planting) was agreed to by the applicant. The USFWS and CDFW provided concurrence with the biologically superior option design and analysis for impacts to wetland resources on May 20, 2022. (FWS-SDG 2022-0045256).

Table 10 summarizes the required and proposed mitigation requirements, which are also outlined in the Habitat Mitigation and Monitoring Plan (HMMP) and the Project Analysis Record (PAR).

Table 10 Summary of Impacts to City Wetlands and Required Mitigation										
City Wetlands	Impacts (acres) ¹			Mitigation			Proposed Mitigation			
	Temp.	Perm.	Total	Ratio	Required (acres)	Total	Restoration	Creation	Enhancement	Total
Disturbed Wetlands/ Un-Vegetated Channel	0.002	0.008	0.010	2:1	0.020	0.580 required wetland mitigation credit	0.217 ²	0.183 ³	0.199 ⁴	0.599
Non-native Riparian	0.137	0.015	0.152	2:1	0.304					
Arundo-dominated Wetland	0.060	0.047	0.107	2:1	0.214					
Southern Riparian Woodland	0.014	0.000	0.014	3:1	0.042					
Totals	0.229	0.025	0.254	2:1	0.580 ⁵					
Source: Biological Survey Report. Notes: Temp. = temporary; Perm. = permanent										

Although wildlife may move locally through the project site and along Alvarado Creek, the project site is largely surrounded by existing development, which severely limits the project site's connection to off-site habitat areas. Furthermore, the project currently is not located within or immediately adjacent to the MHPA. MHPA land is included within the City's MSCP Subarea Plan to provide the necessary habitat quality, quantity, and connectivity to sustain the unique biodiversity of the San Diego region. The nearest MHPA land includes portions of the San Diego River located approximately 0.35 miles west and northwest of the project site and canyons south of I-8, located approximately 0.36 miles south of the project site. The project would have limited potential to result in temporary direct and indirect impacts on wildlife movement through increased noise, human activity, and temporary disturbances to habitat. However, temporary impacts would only occur within Alvarado Creek, and the impact would be minimized and occur over a short duration relative to overall project construction. Long-term impacts to wildlife movement and corridors would be similar to temporary impacts and would result from human activity, lighting, and noise as a result of long-term occupancy of the project site. Post-project conditions would be similar to existing disturbances and ambient conditions at the project site. As discussed above, FPA PEIR Mitigation

¹ Under City guidelines temporary and permanent impacts are mitigated at the same ratio and mitigation ratio is dependent on habitat type

² Includes restoration of temporary impacts to City wetlands on site

³ Includes conversion of upland Tier IV communities to wetland/riparian habitat as part of channel widening restoration

⁴ Refer to discussion of wetland enhancement

⁵ A minimum of 1:1 ratio (0.254 acre) of the total 2:1 mitigation is required to be achieved through restoration or enhancement for no-net loss

Measures BR-5 has already been implemented through preparation of the Biological Survey Report. For the reasons listed above, the impact with respect to wildlife movement and corridors would be less-than-significant.

Overall, the project would result in impacts to biological resources, therefore, a Mitigation Monitoring Reporting Program, as detailed within Section VIII of the Addendum, would be implemented. With implementation of the biological resources monitoring program, potential impacts on biological resources would be reduced to below a level of significance.

Based on the foregoing analysis and information, there are no changes in circumstances or new information identified above that would require a major change to the FPA PEIR. The project would not result in a new significant impact or a substantial increase in the severity of any significant impact identified in the FPA PEIR.

Hydrology and Water Quality

FPA PEIR

Sections 5.7 and 5.8 of the FPA PEIR provided an analysis of hydrology and water quality impacts, respectively, associated with the FPA.

Section 5.7 Issue 1 analyzed the potential of the FPA to result in a change in absorption rates, drainage patterns, or the rate of surface runoff. The FPA PEIR concluded that FPA would have a less-than-significant impact regarding flooding and groundwater impacts. However, the FPA PEIR also concluded that the FPA would have a potentially significant impact regarding impacts to wetlands. The FPA PEIR acknowledged that future development projects under the FPA would have the potential to change drainage patterns and surface runoff characteristics, such as runoff volume and rate. However, the land use amendments associated with the FPA would increase softscape acreage and reduce hardscape acreage relative to conditions existing at the time of FPA PEIR adoption, resulting in decreased impervious land surface and a net reduction in runoff volumes and rates. The FPA PEIR determined that only three out of 17 distinct drainage basins in the FPA area would experience higher runoff flow rates, and the increase would not be substantial. Regarding flooding impacts, the FPA PEIR explained that compliance with the City's floodplain regulations and design requirements, including SDMC Section 143.0145, would reduce flood hazard impacts associated with future development projects in the FPA area. Regarding groundwater impacts, the FPA PEIR explained that groundwater recharge would potentially improve as a result of the reduction in impervious surfaces and the incorporation of Low Impact Development (LID) features (e.g., bio retention areas, pervious pavements) into future development projects, which is required by the City's Drainage Design Manual and Storm Water Standards Manual. Regarding wetlands impacts, the FPA PEIR explained that the FPA would cause an increase in runoff flow volumes for certain drainage basins, which could alter the functions and values of downstream wetland communities. Drainage basins SD-1, SD-2, and A-1 would experience increased runoff volumes during 2-, 10-, and 100-year storm events, and drainage basin SD-3 would experience increased runoff volumes during 10-year storm events. The FPA PEIR provided Mitigation Measure HYD-1, which would reduce the impact to a less-than-significant level in these drainage basins. Mitigation Measure HYD-1 requires future development in the drainage basins listed above to be reviewed by City staff for potential runoff volume and peak flow rate impacts. At the discretion of City review, the future project may be required to prepare a project-specific hydrology study and water quality technical report that identifies specific mitigation measures to incorporate into project design and construction.

Section 5.7 Issue 2 analyzed the potential of the FPA PEIR to result in a substantial alteration to on-site and off-site drainage patterns due to changes in runoff flow rates or volumes. The FPA PEIR concluded that the FPA would have a less-than-significant impact because existing drainage patterns would be preserved and there would be an overall decrease in drainage flow with implementation of the FPA. The FPA PEIR discussed that City guidelines would prohibit future development from diverting water from existing drainage courses, and future development projects would be reviewed by City staff.

Section 5.8 Issue 1 analyzed the potential of the FPA to result in a substantial increase in pollutant discharge to receiving waters and increase discharge of identified pollutants to an already impaired water body. The FPA PEIR concluded that the impact would be potentially significant but would be reduced to a less-than-significant level with implementation of Mitigation Measure HYD-1, described above. The FPA PEIR discusses that future development projects would be required to comply with applicable regulations and permits, including the requirements of the RWQCB and SDMC, the MS4 permit for the San Diego Region, the City's Storm Water Standards Manual, and the California BMP Handbook.

Overall impacts associated with Hydrology and Water Quality were determined to be mitigated to less than significant.

Project

A site-specific Hydraulics Analysis Report, Hydromodification Management Analysis Report, and Priority Development Project (PDP) Storm Water Quality Management Plan (SWQMP) with a Drainage Study were prepared by Rick Engineering consistent with the mitigation framework.

Existing on-site drainage generally flows towards the middle of the north project site boundary and is either collected by an inlet and 18-inch storm drain pipe that conveys flows to the south into Alvarado Creek or surface flows onto an unnamed access road that also conveys flows south into Alvarado Creek. In addition, runoff from off-site properties surface flows onto the site property and towards the aforementioned inlet and access road. The Drainage Study determined that post-project drainage patterns would be similar to existing conditions with runoff eventually conveyed south into Alvarado Creek. The existing 18-inch storm drain would be re-routed around the proposed building and replaced with a 24-inch storm drain, and runoff generated on-site would be directed into water quality and hydromodification management features, including pervious pavement, biofiltration planter boxes, self-retaining articulated blocks, and self-mitigating decomposed granite. The existing and proposed storm drain are located within a 15-foot wide easement. The PDP SWQMP determined that development of the project would result in a 33 percent decrease in on-site impervious surfaces, which, along with hydromodification management features, would reduce existing on-site runoff rate and volume. FPA PEIR Mitigation Measure HYD-1 is not applicable to the project because the project is located in drainage basin A-3, which is not one of the basins required to implement this mitigation measure. The Hydraulics Analysis Report concluded that the project would comply with all flooding regulations, including SDMC Section 143.0146 because the project would improve the hydraulic conveyance of Alvarado Creek through excavation and export along the south side of the creek and would not increase water surface elevation (WSE) by one foot or more. Additionally, the project development pad would be elevated above the Alvarado Creek 100-year floodplain elevation. The base flood elevation is 77.0-feet above mean sea level (MSL), and the proposed pad elevation is 79.3-feet above MSL, over 2-feet above the base flood elevation, as required. Therefore, this impact would be less-than-significant.

The Hydromodification Management Plan (HMP – Rick Engineering – 09.24.21) concluded that the project will not result in a change in the effect of pre and post development runoff within the project watershed. Infiltration was determined to be feasible by an analysis (Krazen -01.08.20) conducted onsite. Infiltration rates of 0.51 to 0.55 inch per hour was documented in the western portion of the site and 0.20 to 0.25 inch/ hour was documented in the eastern portion of the site. Infiltration may be limited near Alvarado Creek, during periods of high flows.

The Drainage Study conducted hydrologic and hydraulic modeling and analysis in conformance with the City of San Diego Transportation and Storm Water Design Manual and Drainage Design Manual. The results of the Drainage Study modeling demonstrate that the project would retain the existing drainage pattern of the site and would not result in an increase in flow compared to existing conditions. In addition, post-project impervious surface area would be less than existing conditions, resulting in a decrease in peak flow rate. Therefore, this impact would be less-than-significant. Table 11 shows the computed flow rates from the project excluding the benefit that will be provided by the proposed stormwater underground storage system:

Table 11 100-Year Storm Event Hydrologic Summary at Key Project Locations								
Node	Pre-Project				Post-Project			
	Area (acres)	Tc (min.)	Velocity (ft/s)	Flow (cfs)	Area (acres)	Tc (min.)	Velocity (ft/s)	Flow (cfs)
104	2.5	5.9	3.3	10.0	2.4	5.9	5.5 ¹	9.7
106	3.3	6.6	6.3	12.7	2.8	7.3	5.5 ²	9.9
204	1.0	5.0	4.1	4.1	1.5	5.5	3.6 ²	6.4
305	1.4	5.9	3.3	5.5	1.4	5.6	4.7	5.3
Total	5.6	6.6	Creek²	21.9	5.6	7.3	Creek³	20.7
¹ Post-project flow at Node 104 is within proposed pipe. ² Post-project flow at Nodes 106 and 204 is at the pipe outfall / connection with the creek. ³ Total flow shown is project site on-site and off-site runoff confluent within Alvarado Creek where flow will comeingle with Alvarado Creek flow minus the Alvarado Creek flow (FEMA Q ₁₀₀ is 5,100 cfs for Alvarado Creek at confluence with San Diego River).								

When considering just the project site, Table 12 shows the benefit in flow reduction that will be provided by the proposed stormwater underground storage system:

Table 12 Project Detention Analysis Results Summary	
Condition	Peak Flow Rate
Unmitigated Flow	6.3 cfs
Mitigated Flow	0.04 cfs

According to the City's Storm Water Requirements Applicability Checklist, the project is considered to be a Priority Development Project. Therefore, a SWQMP was prepared to identify and implement required structural BMPs for storm water pollutant control (BMP Design Manual Chapter 5, Part 1 of Storm Water Standards). The PDP SWQMP includes a completed City of San Diego Form DS-560

Storm Water Requirements Applicability Checklist; Form I-1 Applicability of Permanent, Post-Construction Storm Water BMP (Best Management Practice) Requirements; Form I-3B Site Information Checklist for PDPs; Form I-4B Source Control BMP Checklist for PDPs; Form I-5B Site Design BMP Checklist for PDPs; and Form I-6 Summary of PDP Structural BMPs. With implementation of the proposed water quality and hydromodification management measures and BMPs, the project would meet performance standards and comply with applicable water quality regulations.

The project site is apportioned into 18 DMAs within a total of 2.96 acres. A total of 12 types of BMPs are proposed (1, 3, 5, 6, 7, 8, 9, 10, 11, 12, 13 and 15) to prevent storm water pollution. These include underground stormwater vaults, passive stormwater filtration planters, porous concrete, modular wetlands, water quality basins, and restored wetlands.

Based on the foregoing analysis and information, there are no changes in circumstances or new information identified above that would require a major change to the FPA PEIR. The project would not result in a new significant impact or a substantial increase in the severity of any significant impact identified in the FPA PEIR.

Historical Resources

FPA PEIR

Section 5.9 of the FPA PEIR provided an analysis of impacts to historical resources associated with implementation of the FPA.

Issue 1 analyzed the potential of the FPA to result in adverse physical or aesthetic affects to prehistoric, historic, or architecturally significant buildings, structures, objects, or sites. The FPA PEIR concluded that the impact would be potentially significant because future buildout of the FPA area would facilitate future development that has the potential to impact existing historic resources within the FPA area. The FPA PEIR identified five parcels that contain potentially eligible historic resources in the City Register or California Register of Historic Resources (CRHR). The FPA PEIR provided Mitigation Measure HR-1, which requires future development occurring on any of the five aforementioned parcels to conduct further evaluation of potentially eligible historical structures and provide site-specific mitigation, if needed. The FPA PEIR determined that implementation of Mitigation Measure HR-1 would reduce the impact to a less-than-significant level because any future development projects that may directly or indirectly impact a significant historic resource would be required to incorporate feasible mitigation measures adopted with certification of subsequent CEQA review.

Issue 2 analyzed the potential of the FPA to result in impacts existing religious or sacred uses or disturb human remains, including those interred outside formal cemeteries. The FPA PEIR concluded that the impact would be potentially significant because unknown human remains could be uncovered during construction activities for future development under the FPA. The FPA PEIR discusses that in the event that human remains are discovered during construction, all work shall cease immediately, and procedures outlined in the California Public Resources Code (Section 5097.98) and State Health and Safety Code (Section 7050.5) shall be followed. The FPA PEIR included Mitigation Measure HR-2, which applies to projects subject to discretionary approval that could result in impacts to archaeological resources and requires these projects to determine the presence of any archaeological resources and provide mitigation for any significant resources that may be

impacted by development activity. The FPA PEIR determined that implementation of Mitigation Measure HR-2 would reduce the impact to a less-than-significant level.

Issue 3 analyzed the potential of the FPA to cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5. The FPA PEIR concluded that the impact would be potentially significant because archaeological resources could be uncovered during construction activities for future development under the FPA. However, with implementation of Mitigation Measure HR-2, discussed above, the FPA PEIR determined that the impact would be reduced to a less-than-significant level.

Overall impacts associated with Historical Resources were determined to be mitigated to less than significant.

Project

Consistent with FPA PEIR Mitigation Measure HR-2, a site-specific Archaeological Survey was prepared for the project by ASM Affiliates. A records search with a one-mile radius buffer around the project site completed at the South Coastal Information Center at San Diego State University in order to determine if previously recorded prehistoric or historic cultural resources exist in the project area. The records search identified 36 previously recorded cultural resources within one mile of the project site, eight of which being archaeological sites or isolates and 28 of which being historic single-family houses or other buildings. None of the identified 36 cultural resources are located within the project site. FPA PEIR Mitigation Measure HR-1 is not applicable to the project because the project site is not located on or in close proximity to any of the five potentially eligible historic resources parcels identified in the FPA PEIR.

ASM Affiliates also conducted an intensive pedestrian survey of the project site and immediate surrounding area in January 2019 to detect any unrecorded cultural resources. No cultural resources were identified during the field survey. The Archaeological Survey concluded that no new archaeological resources were identified and the potential for buried deposits is low at the project site.

A Tribal Consultation List and a Sacred Lands File Search was also requested from the Native American Heritage Commission (NAHC), and a response letter from the NAHC was received on February 11, 2020. The response included a consultation list of tribes that are traditionally and culturally affiliated with the geographic area of the project. The NAHC response letter also reported that the results of the Sacred Lands File search for the project site was negative.

Based on the findings of the archaeological survey, there are no known archaeological resources, cultural resources, or historic buildings, structures, or objects in the project site. The project site is vacant. No known burial sites or cemeteries exist within the project site, and it is not expected that unknown human remains would be discovered during construction. In the unlikely event of the discovery of human remains during project grading, work shall halt, and the procedures set forth in the California Public Resources Code (Section 5097.98) and state Health and Safety Code (Section 7050.5) shall be undertaken. For these reasons, the project would have a less-than-significant impact on prehistoric and historic resources, human remains, and archaeological resources.

Based on the foregoing analysis and information, there are no changes in circumstances or new information identified above that would require a major change to the FPA PEIR. The project would

not result in a new significant impact or a substantial increase in the severity of any significant impact identified in the FPA PEIR.

Visual Effects and Neighborhood Character

FPA PEIR

Section 5.10 of the FPA PEIR provided an analysis of visual effects and neighborhood character impacts associated with the FPA.

Issue 1 analyzed the potential of the FPA to create substantial obstruction of any vista or scenic view from a public viewing area. The FPA PEIR concluded that the FPA would have a less-than-significant impact because the Navajo Community Plan does not identify any public viewsheds; future development consistent with the FPA would potentially open up various view corridors within the community that are currently blocked by industrial and commercial development; and future development under the FPA would be required to comply with the development standards of the LDC, General Plan Urban Design Element, Navajo Community Plan, and the San Diego River Park Master Plan.

Issue 2 analyzed the potential of the FPA to create a negative aesthetic. The FPA PEIR concluded that the impact regarding aesthetic appearance would be less-than-significant impact because the FPA area is mostly commercial and industrial in nature and could benefit from a shift to more mixed-use and transit-oriented development, which would provide a more pedestrian-oriented community and include appropriate landscaping and hardscaping for public use. In addition, the FPA PEIR discusses how the FPA would provide the opportunity to benefit the aesthetic appearance of the Grantville community area by supporting future development projects that would provide updated, modern buildings and structures that would be required to comply with the development standards of the LDC, General Plan Urban Design Element, supplemental design regulations of the Navajo Community Plan (Grantville CPIOZ Section), and the San Diego River Park Master Plan.

Issue 3 analyzed the FPA's compatibility with surrounding development regarding the FPA's bulk, scale, materials, and style. The FPA PEIR concluded that the impact would be less-than-significant because although the bulk, scale, materials, and style of the area would change as a result of FPA implementation due to reduced commercial and industrial uses and increased mixed-use and pedestrian-oriented residential uses, this change would allow the FPA area to blend more appropriately with the surrounding community's residential and institutional land use type, especially given that all future development would be required to comply with all applicable City design regulations and development standards.

Issue 4 analyzed the potential of the FPA to cause a substantial alteration to the existing or planned character of the area. The FPA PEIR concluded that the impact would be less-than-significant because future development under the FPA would provide a benefit to neighborhood character due to the FPA's goal to create a walkable, bikeable, mixed-use, transit-oriented neighborhood with wide, enhanced sidewalks, streetscape furnishings, and bicycle amenities.

Issue 5 analyzed the potential of the FPA to create a substantial amount of light and glare that would adversely affect daytime or nighttime views. The FPA PEIR concluded that the impact would be less-than-significant because although the FPA allows for future development that would involve new

sources of light and glare, all future development would be required to comply with City development standards that address lighting, including those in the LDC. Overall impacts associated with Visual Effects and Neighborhood Character were determined to be less than significant.

Project

The project site is located within a primarily light industrial and commercial area with views of the surrounding land uses and the elevated trolley tracks, and is relatively flat with elevations ranging from 64 to 96 feet above mean sea level. The project site slopes down towards the center of the project site, where the site is bisected by Alvarado Creek. The portion of the project site north of Alvarado Creek, where the residential development would be constructed is vacant. The minimal vegetation in this part of the project site includes a few scattered palm trees and ornamental landscaping around the existing structures. The portion of the site south of Alvarado Creek includes previously graded areas. The southern portion of the site has been used for illegal dumping, fill material storage, and homeless encampments. The site is bordered by light industrial and commercial land uses to the north and west and a mix of undeveloped and/or disturbed land, light commercial, and the Grantville Trolley Station to the south and east. The Biological Survey Report identified six vegetation communities/land cover types within the project site: Urban/Developed Area (6.05 acres), Disturbed Lands (1.87 acres), Arundo-dominated Wetland (0.29 acres), Non-native Riparian (0.26 acres), Disturbed Wetland/Non-vegetated Channel (0.21 acres), and Southern Riparian Woodland (0.11 acres). Vegetated land is concentrated along Alvarado Creek.

The Navajo Community Plan does not identify any public viewsheds in the area that could be affected by the project but does acknowledge that scenic resources exist within the plan area in open space and recreational areas (City of San Diego 2015). There are no existing public views of Alvarado Creek that could be affected by the project; rather, the project would provide new public views of the creek and improve its scenic value by providing a community trail along the on-site portion of the creek and through restoration, enhancement, and creation of wetland and native habitats within the on-site portion of Alvarado Creek. Therefore, the project would result in a less than significant impact regarding public views.

As discussed above, existing vegetation on-site is concentrated along Alvarado Creek, and the residential development would be constructed north of Alvarado Creek where the land is already disturbed and developed with pavement and structures. Additionally, the project would improve the existing aesthetic of the project site and surrounding area by removing existing commercial buildings with low aesthetic value and replacing them with a modernized residential development designed in compliance with the current development standards of the LDC, General Plan Urban Design Element, and design guidelines and supplemental development regulations of the Navajo Community Plan. Views of the creek and accessibility of these views would be improved through wetland restoration, creation, and enhancement within and adjacent to the on-site portion of Alvarado Creek and development of a community trail. Therefore, the project would result in a less-than-significant impact regarding aesthetic appearance of the FPA.

Because existing land uses in the project vicinity are primarily industrial and commercial, the project would alter the bulk, scale, materials, and style of the area due to the nature of the project as a five-story residential development surrounded primarily by one- and two-story buildings (although the project would be consistent with the scale of the above grade Grantville Trolley Station located to the south of the project site). However, as discussed in the FPA PEIR, the changes in bulk, scale,

materials, and style of future development under the FPA, such as the project, would allow the FPA area to blend more appropriately with the surrounding community's residential and institutional land use type, resulting in a less-than-significant impact regarding the bulk and scale of the project. Therefore, the project would have a less-than-significant impact regarding neighborhood character. Consistent with the FPA PEIR, the project would be required to comply with City development standards that address lighting and glare, including those in the LDC. Therefore, the project would have a less-than-significant impact regarding light and glare.

Based on the foregoing analysis and information, there are no changes in circumstances or new information identified above that would require a major change to the FPA PEIR. The project would not result in a new significant impact or a substantial increase in the severity of any significant impact identified in the FPA PEIR.

Geologic Conditions

FPA PEIR

Section 5.11 of the FPA PEIR provided an analysis of geology and soil impacts associated with implementation of the FPA.

Issue 1 analyzed the FPA's potential to expose people or property to geologic hazards including earthquakes, tsunamis, landslides, mudslides, flooding, expansive or corrosive soils, and liquefaction. The FPA PEIR concluded that the FPA would have no impact regarding tsunamis and would result in a less-than-significant impact associated with all other geologic hazards because all new developments in the FPA area would be required to comply with requirements in the San Diego Municipal Code (SDMC) and the California Building Code (CBC).

Issue 2 analyzed the potential of the FPA to result in a substantial increase in soil erosion from wind or water. The FPA PEIR concluded that the FPA would have a less-than-significant impact because future development projects would be required to comply with the SDMC, NPDES General Construction Storm Water Permit, and MS4 Stormwater Permit. Additionally, certain projects would be required to prepare and implement a Stormwater Pollution Protection Plan (SWPPP) and BMPs. Issue 3 analyzed hazards associated with geologic instability, such as seismically induced landslides, liquefaction, and seismically induced settlement. The FPA concluded that the impact would be potentially significant because some portions of the FPA area have low to moderate risk for landslides; parcels in close proximity to the San Diego River and Alvarado Creek may have a moderate to high potential for liquefaction; and the FPA area is underlain by fill, young alluvium, and young colluvium that may be subject to settlement under foundational loads. However, the FPA PEIR determined that implementation of Mitigation Measure GC-1, as well as future development's compliance with the SDMC and the CBC, would reduce the impact to a less-than-significant level. Mitigation Measure GC-1 requires geologic hazards to be mitigated at the project-level through adherence to the City's Seismic Safety Study and recommendations presented in a site-specific geotechnical report prepared in accordance with the City's Geotechnical Report Guidelines.

Overall impacts associated with Geologic Conditions were determined to be mitigated to less than significant.

Project

FPA PEIR Mitigation Measure GC-1 is applicable to the project and has already been implemented through preparation of the site-specific Geotechnical Engineering Investigation prepared for the project by Krazan & Associates. The Geotechnical Engineering Investigation determined that the project site is not underlain by an active fault and is not located within an Earthquake Fault Zone. The Newport-Inglewood and Rose Canyon Fault Zones are the closest active fault zones to project site and are both located approximately 5.6 miles from the site. Therefore, the risk associated with fault rupture and ground shaking is considered low. The Geotechnical Engineering Investigation concluded that adherence to seismic design codes and implementation of design and construction recommendations included in the report would be sufficient to mitigate risk from seismic hazards (e.g., ground shaking and seismic induced settlement). As discussed in the FPA PEIR, there are no potential impacts associated with tsunamis in the FPA area due to its inland location and elevation. The project site is located within the FPA area and, thus, would not be at risk of inundation by tsunami. Because of the relatively flat profile of the project site and surrounding area, the Geotechnical Engineering Investigation determined that rockfalls, landslides, slope instability, and debris flows are not anticipated to pose a hazard to the project site. The project site is located within the 100-year floodplain adjacent to Alvarado Creek. However, the project has been designed to elevate structures above the 100-year floodplain water level to mitigate flooding risks. Soil testing for the Geotechnical Engineering Investigation revealed that on-site soils have a moderate sulfate exposure value and a severe potential for metal loss from electrochemical corrosion. If the project would involve installation of any underground metal utilities, potential impacts associated with corrosive soils would be avoided through consultation with a qualified corrosion engineer.

To summarize, based on the results of the Geotechnical Engineering Investigation, risks associated with geologic hazards would be adequately addressed with project compliance with SDMC and CBC requirements, as well as implementation of the project-specific recommendations presented in the Geotechnical Engineering Investigation, which would be required as mitigation measures for the project. By preparing the Geotechnical Engineering Investigation and implementing its project-specific recommendations that project would be consistent with FPA PEIR Mitigation Measure GC-1. Implementation of proper engineering design and utilization of standard construction practices, to be verified at the building permit stage, would result in an acceptable level of risk related to geologic hazards. The project's geologic hazards impact would be less-than-significant.

Regarding erosion, a site-specific SWQMP was prepared by Rick Engineering, which documents that the project would be required to implement best management practices (BMPs) in accordance with the performance standards documented in the City's Storm Water Standards Manual. Therefore, impacts related to erosion would be less-than-significant.

As discussed above, the Geotechnical Engineering Investigation determined that landslides are not anticipated to pose a hazard to the project site and adherence to seismic design codes and implementation of design and construction recommendations included in the report would be sufficient to mitigate risk from seismic hazards, such as seismically induced settlement. In addition, the Geotechnical Engineering Investigation determined that the potential for seismic-induced soil liquefaction within the project site is low. Although the project site is located in an area designated as a Liquefaction Hazard Zone based on the City's Seismic Safety Study Map, modeling conducted for the Geotechnical Engineering Investigation indicated that the project site is not conducive to

liquefaction induced settlement. Therefore, impacts related to geologic stability would be less-than-significant.

Based on the foregoing analysis and information, there are no changes in circumstances or new information identified above that would require a major change to the FPA PEIR. The project would not result in a new significant impact or a substantial increase in the severity of any significant land use impact identified in the FPA PEIR.

Paleontological Resources

FPA PEIR

Section 5.12 of the FPA PEIR provided an analysis of impacts to paleontological resources associated with implementation of the FPA. The following soils were determined to occur within the FPA:

- **Fill:** Existing fills in the proposed FPA area are expected to consist of engineered and undocumented fills, derived from nearby formational and surficial units. Fill soils can vary from clay to sand, depending on the parent material. The compaction of the fills can vary considerably, ranging from loose to dense.
- **Qya:** Young Alluvial Flood-Plain Deposits (Holocene and late Pleistocene) Qya consists of poorly sorted, poorly consolidated, permeable flood-plain deposits of sand, silt, or clay. Scattered layers of gravel and cobbles are also likely to be present within the alluvium. The alluvium is generally in a loose condition and much of it would be subject to liquefaction below the water table. In developed parts of the western portion of the proposed FPA area, alluvium is likely to be present below existing fill soils.
- **Qoa:** Old Alluvial Flood-Plain Deposits (late to middle Pleistocene) Qoa consists of poorly sorted, well consolidated, permeable, commonly slightly dissected gravel, sand, silt, and clay.

The FPA PEIR concluded that the FPA does not include any low, medium, or high sensitivity geologic formations and implementation of the FPA would not impact any sensitive geologic formations, resulting in no impact.

Project

Review of Figure 5.11-1 of the Grantville FPA Final PEIR identified that no low, medium, or high sensitivity geologic formation occur within the study area. The project would require XXXX cubic yards of cut to a depth of XXXX feet. However, because the project area does not contain any sensitive geologic formations, no impact would occur.

Based on the foregoing analysis and information, there are no changes in circumstances or new information identified above that would require a major change to the FPA PEIR. The project would not result in a new significant impact or a substantial increase in the severity of any significant impact identified in the FPA PEIR.

Health and Safety

FPA PEIR

Section 5.13 of the FPA PEIR provides an analysis of health and safety impacts associated with implementation of the FPA.

Issue 1 analyzed the potential of the FPA to expose people or structures to significant risk of loss, injury, or death involving wildland fires. The FPA PEIR concluded that the impact would be potentially significant because portions of the FPA area in the north, west, and southeast are located within a Very High Fire Hazard Severity Zone (VHFHSZ), and future development under the FPA would occur in these areas. However, the FPA PEIR determined that the impact would be reduced to a less-than-significant level with implementation of Mitigation Measure HS-1, which requires new development to incorporate fire risk reduction measures in accordance with the Land Development Code Landscape Standards and in compliance with the California Fire Code and California Building Code.

Issue 2 analyzed the potential of the FPA to result in hazardous waste emissions or the handling of hazardous materials, substances, or waste within a quarter mile of a school. The FPA PEIR concluded that the impact would be potentially significant because several schools exist within the FPA area, and future development activities could potentially expose schools to hazardous materials and waste. However, the FPA PEIR determined that implementation of Mitigation Measures HS-2 through HS-12, described below, would reduce this impact to a less-than-significant level because these measures would reduce the likelihood of and risk associated with accidental release of hazardous materials and waste.

Mitigation Measure HS-2 requires property-specific due diligence processes to be conducted by a qualified environmental professional in accordance with applicable guidelines and regulations, including a Phase 1 Environmental Site Assessment (ESA). Mitigation Measure HS-3 requires properties with suspected or documented soil and/or groundwater contamination to conduct further evaluation, such as a Phase II ESA and/or remediation activities. Mitigation Measure HS-4 requires 'case closure' regulatory status to be reevaluated by a qualified environmental professional in conjunction with the applicable regulatory agency prior to the start of future development activities. Mitigation Measure HS-5 requires properties with suspected or documented impacts to soil and/or groundwater to implement appropriate worker and community health safety measures under the oversight of a qualified environmental professional during soil/groundwater disturbance activities. Mitigation Measure HS-6 requires certain precautions to be observed during excavation activities to avoid impacts from any contaminated soil and/or groundwater not identified during pre-construction technical studies. Mitigation Measure HS-7 requires chemical characterization of any soil generated during construction activities at contaminated properties prior to reuse, export, or disposal. Mitigation Measure HS-8 requires further assessment performed by a qualified environmental professional if discolored soil or other potential environmental issues are encountered during construction. Mitigation Measure HS-9 requires development of impacted or potentially impacted properties involving soil disturbance to implement a soil and groundwater management plan. Mitigation Measure HS-10 regulates construction that would involve groundwater dewatering activities. Mitigation Measure HS-11 requires projects involving renovation or demolition of structures to conduct a survey prior to construction activities that identifies the presence of hazardous building materials (e.g., asbestos, lead) and provides appropriate abatement measures. Mitigation Measure HS-12 requires that projects involving the demolition of structures built in the 1970s or earlier analyze surface and shallow soils for lead and termiticides prior to demolition or soil disturbance.

Issue 3 analyzed the potential of the FPA to impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. The FPA PEIR concluded that the impact would be less-than-significant because future development under the FPA would be

consistent with the Navajo Community Plan and, thus, would not involve the closure of evacuation routes or interfere with an emergency response plan.

Issue 4 analyzed existing hazardous material sites located within the FPA area that could create a significant hazard to the public or environment. The FPA PEIR concluded that the impact would be potentially significant because hazardous material and waste may exist within the FPA area that could be disturbed during future development construction activities. The impact was reduced to a less-than-significant level with implementation of Mitigation Measures HS-2 through HS-12, discussed above.

Issue 5 analyzed the potential of the FPA to expose people to toxic substances, such as pesticides and herbicides, applied to the soil during previous agricultural uses. The FPA PEIR concluded that, based on the historical urban development of the FPA area and length of time since the area was used for agricultural purposes, future development under FPA would not likely expose people to residual agricultural contaminants. However, if any harmful agricultural contaminants exist in the soil in the FPA area, such contaminants could be released and people could be exposed, which is a potentially significant impact. However, the FPA PEIR determined that implementation of Mitigation Measures HS-2 through HS-12, discussed above, would ensure that future development projects do not expose people to these toxic substances, reducing the impact to a less-than-significant level. Overall impacts associated with Health and Safety were determined to be mitigated to less than significant.

Project

The project site is not located within a designated Very High Fire Hazard Severity Zone, per the CAL FIRE's Very High Fire Hazard Severity Zone Map (CAL FIRE 2020). The project would be designed in accordance with the Land Development Code Landscape Standards and in compliance with the California Fire Code and California Building Code, as required by FPA PEIR Mitigation Measure HS-1. Therefore, the project would not expose people to substantial risk associated with wildfires, and this impact would be less than significant with mitigation.

A Phase I Environmental Site Assessment (ESA) was completed for the project by RNC Environmental, LLC in November 2019. Completion of the Phase I ESA satisfies FPA PEIR Mitigation Measure HS-2. The Phase I ESA did not identify any current recognized environmental conditions on connection with the project site; it did identify historic conditions for the site including a leaking underground storage tank (LUST) from 1989 and chlorinated pesticide release from 1988. Contaminated soil associated with the LUST was excavated and removed and that case was closed by the San Diego County Department of Environmental Health. Remediation of the chlorinated pesticide release was overseen by the Regional Water Quality Control Board and no further action is needed because the release area was located within the planned open space portion of the project. Based on the list of educational facilities in the Navajo Community Plan and review of the project area, one elementary school was identified within a quarter mile of the project site. Grantville School is located approximately 0.25 miles north of the project site. Project construction may require the use of small amounts of common solvents and petroleum products, which are routinely used in building construction. However, these materials are not acutely hazardous and would be used in small quantities. Operation of the project would involve typical activities associated with residential housing and would not include uses such as gasoline service stations, automobile repair facilities, dry cleaning facilities, or chemical facilities that would require the routine transport, use, or disposal

of large quantities of hazardous materials. Therefore, the project would not result in hazardous emissions or handle acutely hazardous materials within a quarter mile of a school, and this impact would be less-than-significant.

Project construction would require a temporary lane closure on Mission Gorge Road to set up, operate, and decommission cranes. Crane set up and decommissioning would occur at night to reduce congestion impacts on Mission Gorge Road. The lane closure would be temporary and would continue to allow traffic to pass along the righthand lane. In addition, Mission Gorge Road is not designated as an evacuation route by the County of San Diego (County of San Diego 2021). The project would prepare a traffic control plan to be approved by the City that would require that the lane closure not impede emergency response or evacuation. Therefore, the project would have a less-than-significant impact on evacuation corridors and emergency response routes.

Review of the State Water Resources Control Board Geotracker and Department of Toxic Substances Control (DTSC) Envirostor databases was performed on March 12, 2021 and identified one LUST Cleanup Site located on the project site and two Cleanup Program Sites located directly adjacent to the project site (SWRCB 2021, DTSC 2021). The cleanup status of all three sites is case closed. Due to the closed status of these cleanup sites, the project is not anticipated to disturb or release any existing hazardous materials or waste into the environment.

Former uses of the project site and existing uses surrounding the project site are primarily light industrial and commercial. Based on review of aerial photographs and the site's zoning history, it does not appear that the site has historically been used for agricultural purposes. Therefore, the potential for project construction to release toxic contaminants such as pesticides and herbicides into the environment is low.

The project would not be required to implement FPA PEIR Mitigation Measures HS-3 through HS-5, HS-7, and HS-9 through 12 because the Phase I ESA did not identify any soil or groundwater contamination on the project site and the project does not involve renovation or demolition of structures. The project would be required to implement FPA PEIR Mitigation Measures HS-6 and HS-8, which require that specified precautions and further assessment be performed during construction if previously unknown contaminated soil or groundwater is encountered during excavation or other construction activities. Potentially significant impacts related to encountering contaminated soil or groundwater during construction would be reduced to less than significant with mitigation.

Based on the foregoing analysis and information, there are no changes in circumstances or new information identified above that would require a major change to the FPA PEIR. The project would not result in a new significant impact or a substantial increase in the severity of any significant impact identified in the FPA PEIR.

Public Services

FPA PEIR

Section 5.14 of the FPA PEIR provides an analysis of impacts to public services and facilities from FPA implementation. Public services and facilities include police, fire rescue, libraries, parks, schools, roadways, and recreational facilities, all of which were analyzed under Issue 1.

Regarding police services and facilities, the FPA PEIR concluded that impacts related to the construction of police facilities would be less-than-significant. The FPA PEIR determined that the increase in residential dwelling units under the FPA would likely result in increased numbers of calls for service. However, the construction of any new facilities or expansion of existing facilities that may be required as a result of future actions not associated with the FPA would be subject to further environmental review.

The FPA PEIR determined that it is not anticipated that additional fire stations would be necessary. In addition, expansion of Fire Station 31, which is the primary responding unit for fire hazards in the FPA area, or development of a new fire rescue facility would be subject to separate environmental review. Therefore, the FPA PEIR concluded that impacts related to the construction of fire protection facilities would be less-than-significant.

Regarding libraries, the FPA PEIR concluded that two libraries, the Allied Gardens/Benjamin Library and the Mission Valley Library, could adequately service the increase in residents anticipated under the FPA, resulting in a less-than-significant impact.

The FPA PEIR identified that new parks would be required in the FPA area in order to meet the increased demand associated with buildout of the FPA. At buildout, the Navajo Community population will require approximately 204 acres of population-based parks, and the Navajo PFFP identified several potential park and recreation facilities that will be scheduled once funding sources are secured. Any future development in the FPA area would be required to contribute a proportionate fair-share to the construction of park and recreational facilities, as identified in the Navajo Community Plan, through the mandatory payment of Development Impact Fees (DIFs). In addition, the construction of any new park and recreation facilities would be subject to environmental review pursuant to CEQA. Therefore, the FPA PEIR concluded that impacts related to the construction of new park and recreation facilities within the FPA area would be less-than-significant.

The FPA PEIR determined that FPA buildout would place additional demands on school services because the increase in population in the FPA area would potentially result in increased student enrollment. Between the six San Diego Unified School District (SDUSD) schools that serve the FPA area, there would likely not be enough capacity available to serve the anticipated increase in student population, and the development of new schools could be required. The FPA PEIR explained that the school district will be responsible for potential expansion or development of new facilities, and subsequent projects would be subject to environmental review by SDUSD. The FPA PEIR determined that payment of the statutory fee, pursuant to Senate Bill 50, by future projects consistent with FPA would mitigate the impact associated with increased demand for schools because of the provision that the statutory fees constitute full and complete mitigation. Therefore, impacts to schools resulting from future development under the FPA were concluded to be less-than-significant. The FPA PEIR determined that increased traffic volumes would potentially affect roadway conditions on heavily used roadway segments. However, the Grantville Community Plan Implementation Overlay Zone (CPIOZ) Type A designation within the FPA area provides regulations and guidelines regarding transit-oriented development, which would reduce reliance on automobiles for transportation to, from, and within the FPA area. Therefore, the FPA PEIR concluded that impacts associated with roadway maintenance would be less than significant.

Overall impacts associated with Public Services were determined to be less than significant.

Project

The project would develop a residential use consistent with the land use designations identified in the FPA. Thus, the project would be consistent with growth projections that were utilized to forecast future police protection demand that was analyzed in the FPA PEIR. Therefore, the project would not result in development beyond that anticipated under the FPA. Given the size of the project, it would not substantially increase the demand for police protection within the service area. Although the project could result in increases in service calls, no new facilities or improvements to existing facilities would be required as a result of the project due to its consistency with future development projections for the FPA. Therefore, the project would not require any new or expanded police protection facilities, and impacts would be less than significant.

The project would develop a residential use consistent with the land use designations identified in the FPA. Thus, the project would be consistent with growth projections that were utilized to forecast demand for future fire protection that was analyzed in the FPA PEIR. Therefore, the project would not result in development beyond that anticipated under the FPA. Given the size of the project and the fact that the project site is not located in a Very High Fire Hazard Severity Zone (VHFHSZ), the project would not substantially increase the demand for fire protection within the service area. The project would not require any new or expanded fire protection facilities, and impacts would be less than significant.

The project would develop a residential use consistent with the land use designations identified in the FPA. Thus, the project would be consistent with growth projections that were utilized to forecast demand for library services that was analyzed in the FPA PEIR. The FPA PEIR determined that the Allied Gardens/Benjamin Library and the Mission Valley Library could adequately service the increase in residents anticipated under the FPA. Therefore, this impact would be less-than-significant.

The project would develop residential apartments that would increase the population in Grantville, resulting in increased demand on park and recreation facilities. However, the project would be consistent with growth projections that were utilized to forecast demand for park and recreation facilities that was analyzed in the FPA PEIR. The project involves restoring a section of Alvarado Creek and constructing a community trail along the creek to improve community access to the creek, provide pedestrian and bicycle accessibility, and provide recreation space. Environmental impacts related to creek restoration and construction of the community trail are analyzed in this addendum. Therefore, this impact would be less than significant.

As discussed in the FPA PEIR, development projects in the FPA area are required to pay the statutory fee, pursuant to Senate Bill 50, which would mitigate the impact associated with increased demand for schools because of the provision that the statutory fees constitute full and complete mitigation. The project would pay the statutory fee, thus fully mitigating any impacts to school services. Therefore, this impact would be less-than-significant.

The site is within the Grantville CPIOZ Type A designation, which was established to increase transit-oriented development and reduce reliance on automobiles for transportation. Therefore, the project would not substantially affect roadway conditions, and this impact would be less-than-significant.

Based on the foregoing analysis and information, there are no changes in circumstances or new information identified above that would require a major change to the FPA PEIR. The project would

not result in a new significant impact or a substantial increase in the severity of any significant impact identified in the FPA PEIR.

Public Utilities

FPA PEIR

Section 5.15 of the FPA PEIR evaluated potential impacts on public utilities that may occur through development of the FPA.

Issue 1 analyzed the potential of the FPA to result in the need for new systems or require substantial alterations to existing utilities, including water, sewer/wastewater, stormwater, and solid waste. The FPA PEIR concluded that impacts related to water and sewer/wastewater services would be less-than-significant because water and sewer/wastewater infrastructure already exists in the area, there is sufficient water supply to serve the FPA's future water demands, the FPA would not require new facilities to be constructed, and existing water and sewer/wastewater facilities would be able to meet demand from implementation of FPA. The FPA PEIR acknowledged that future development under the FPA would have the potential to require the alteration of water, sewer/wastewater facilities. However, the FPA PEIR determined that these foreseeable alterations would not be substantial in nature.

The FPA PEIR concluded that the impact regarding stormwater management and infrastructure would be potentially significant but reduced to a less than significant level with implementation of Mitigation Measure HYD-1. As discussed in the Hydrology and Water Quality section of this addendum, Mitigation Measure HYD-1 requires future development located within certain drainage basins (SD-1, SD-2, and A-1) to be reviewed by City staff and, in some cases, prepare a project-specific hydrology study for approval by the City. The FPA PEIR determined that implementation of Mitigation Measure HYD-1, as well as compliance with the requirements in the SDMC and adherence to the California Best Management Practice (BMP) Handbook, all potential impacts from stormwater runoff would be fully minimized.

The FPA PEIR concluded that impacts related to solid waste disposal would be potentially significant but reduced to less-than-significant with implementation of Mitigation Measure PU-1. The FPA PEIR discusses that implementation of the FPA would increase the solid waste disposal needs of future residents and businesses. However, future development would be required to comply with the City's Refuse and Recycle Materials Storage Regulations, the Recycling Ordinance, and the Construction and Demolition Debris Deposit Ordinance, among others. Future development that would generate 60 tons or more of solid waste would be required to implement Mitigation Measure PU-1, which requires these projects to prepare a Waste Management Plan (WMP) to be approved by the Environmental Services Department.

Issue 2 analyzed the potential of the FPA to result in the use of excessive amounts of fuel or energy (e.g., natural gas), power, or water. The FPA PEIR concluded that the impact would be less-than-significant. The FPA PEIR recognized that future development of the FPA area would increase the demand for water services, fuel, energy, and power. However, the FPA PEIR discussed that future development would be subject to project-specific environmental review and would be required to comply with all applicable City regulations, standards, and guidelines, as well as mandatory state and regional regulations requiring the utilization of energy conservation measures. In addition, the

CPIOZ Type A designation adopted by the FPA would result in expanded transit-oriented development, thus reducing fuel consumption.

Issue 3 analyzed the potential of the FPA to predominantly use non-drought resistant vegetation in landscaping. The FPA PEIR concluded that there would be no impact because future development would be required to comply with the applicable policies of the General Plan and the City's Landscape Standards, which require use of drought resistant species in landscaping.

Overall impacts associated with Public Utilities were determined to be mitigated to less than significant.

Project

The project would connect to an existing 10-inch PVC sewer main and a 16-inch water pipe, which would be adequate to serve the sewer and water needs of the project. Thus, the project would not increase demand for sewer and water service within the Navajo Community that would necessitate construction of new off-site facilities. Therefore, the impact regarding water and sewer/wastewater services would be less-than-significant.

The Drainage Study prepared by Rick Engineering described the drainage characteristics of the project site and surrounding area and analyzed anticipated post-project hydrologic conditions. The report explained that north of Alvarado Creek, water onsite generally flows towards the middle of the project site's northern boundary, where it either enters an inlet and storm drain pipe that conveys flows south into Alvarado Creek or remains as a surface flow onto an unnamed access road that drains into Alvarado Creek. The 18-inch storm drainpipe would be rerouted around the proposed building and into Alvarado Creek. The Drainage Study determined that the project would not result in an increase in flow in comparison to the pre-project condition and, thus, would not result in negative impacts to adjacent properties or the downstream system. In addition, the project would incorporate water quality and hydromodification management features consistent with local regulations to manage runoff generated onsite. As discussed in the Hydrology and Water Quality section of this addendum, For the reasons listed above, the impact regarding stormwater management would be less-than-significant.

A WMP was prepared for the project by Rick Engineering and estimated that approximately 197.5 tons of waste would be generated during construction. The WMP determined that operation of the project would generate approximately 273 tons of waste per year. The project would include refuse storage and recycling areas, and the applicant (or applicant's successor in interest) would implement the ongoing waste reduction measures documented in the WMP to ensure that project operation would comply with applicable City recycling ordinances and that waste would be minimized. As a residential development, the project would be required to comply with all applicable local regulations regarding solid waste, including the City's Refuse and Recycle Materials Storage Regulations, the Recycling Ordinance, and the Construction and Demolition Debris Deposit Ordinance. For the reasons listed above, the project would have a less-than-significant impact with respect to solid waste disposal.

As discussed above, the existing 16-inch water pipe would be adequate to serve the water needs of the project. Electricity for the project would be served by San Diego Gas & Electric. The project would involve removal of an existing power pole and replacing it at the northeastern boundary of the project site, as well as installing underground powerlines to connect to the new power pole. These

alterations are needed in order to provide electricity to the project site and would occur within the project site boundary. No other alterations to energy infrastructure would be required. The project would be built in compliance with CBC 2019 Building Efficiency Standards, which are more efficient than the standards in place when the PEIR was certified. In addition, because of the project site's CPIOZ Type A designation and its proximity to the Grantville Trolley Station, the project would not result in substantial increase in fuel consumption. For the reasons listed above, the project would have a less-than-significant impact with respect to water services, fuel, energy, and power. The project would incorporate drought tolerant landscaping and would comply with applicable policies of the General Plan and the City's Landscape Standards. Therefore, the project would have a less-than-significant impact regarding landscaping.

Based on the foregoing analysis and information, there are no changes in circumstances or new information identified above that would require a major change to the FPA PEIR. The project would not result in a new significant impact or a substantial increase in the severity of any significant impact identified in the FPA PEIR.

Agricultural and Mineral Resources

FPA PEIR

Sections 9.1 and 9.2 of the FPA PEIR addressed agricultural and mineral resources associated with the FPA PEIR concluded that there would be no impact to agricultural and mineral resources. The FPA area is urbanized and has no forestland, timberland, Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. In addition, the FPA area is not zoned for agriculture and is not under a Williamson Act contract. Regarding mineral resources, the southwestern portion of the FPA area adjacent to the San Diego River is located in Mineral Resource Zone (MRZ) 2, while the northeastern portion of the FPA area is located in MRZ-3. MRZ-2 areas are considered to have extractable aggregate deposits, and MRZ-3 areas are considered to contain mineral deposits that may qualify as mineral resources. However, the FPA area is urbanized and the potential for loss of mineral deposits due to further development is low.

Overall impacts associated with agriculture and Mineral Resources were determined to result in no impact.

Project

The project site does not contain any forestland, timberland, Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. In addition, the project site is not zoned for agriculture and is not under a Williamson Act contract. According to the California Geological Survey Open File Report 96-04 used in the FPA PEIR, the project site is located in MRZ-2. The project would not involve the extraction of any mineral resources and all disturbed soil would be reused onsite. In addition, the majority of the site is developed or disturbed, and thus, the potential for loss of mineral deposits due to development is low. Therefore, there would be no impact to agricultural and mineral resources.

Based on the foregoing analysis and information, there are no changes in circumstances or new information identified above that would require a major change to the FPA PEIR. The project would not result in a new significant impact or a substantial increase in the severity of any significant impact identified in the FPA PEIR.

VI. ISSUES NOT ANALYZED IN THE PREVIOUS EIR

CEQA Guidelines, Section 15128, allows environmental issues for which there is no likelihood of a significant impact to not be discussed in detail or analyzed further in the EIR. The certified PEIR determined the Grantville Focused Plan Amendment would have less than significant impacts to Agricultural Resources and Mineral Resources. Revisions to the project components evaluated under the PEIR are proposed with the current project. Through the environmental analysis conducted, the City has determined that the current project, subject of and evaluated under this Addendum would not have the potential to cause significant impacts to those issue areas beyond those analyzed. While these issues were not analyzed in detail, as outlined in CEQA Section 15128, there is no new information available that would indicate that these issues would result in new significant impacts.

VII. SIGNIFICANT UNMITIGATED IMPACTS

The FPA PEIR concluded that the project would result in significant and unavoidable environmental impacts for land use (noise compatibility), air quality, noise (operational), and transportation/circulation. The following issue areas were determined to be potentially significant but reduced to below a level of significance with mitigation: Noise (Construction), Biological Resources, Hydrology/Water Quality, Historical Resources (Built Environment and Archaeological), Geologic Conditions, Health and Safety, and Public Utilities (Solid Waste). Impacts for the following issue areas were determined to be less than significant: Greenhouse Gas Emissions, Paleontological Resources, Visual Quality/Neighborhood Character, Public Services and Facilities, Agricultural and Forest Resources, Mineral Resources, and Population and Housing.

The FPA PEIR indicated that significant impacts to the following issue areas would be substantially lessened or avoided if all the proposed mitigation measures recommended in the Final PEIR were implemented: Noise (Construction), Biological Resources, Hydrology/Water Quality, Historical Resources (Built Environment and Archaeological), Geologic Conditions, Health and Safety, and Public Utilities (Solid Waste). The Final PEIR further concluded that significant impacts related to land use (noise compatibility), air quality, noise (operational), and transportation/circulation would not be fully mitigated to below a level of significance. With regard to cumulative impacts, implementation of the FPA Final PEIR would result in significant impacts related to land use (related to noise), transportation/circulation, air quality and odor, and noise impacts, which would remain significant and unmitigated. As there were significant unmitigated impacts associated with the original project approval, the decision maker was required to make specific and substantiated "CEQA Findings" which stated: (a) specific economic, social, or other considerations which make infeasible the mitigation measures or project alternatives identified in the FPA PEIR, and (b) the impacts have been found acceptable because of specific overriding considerations. Given that there are no new or more severe significant impacts that were not already addressed in the previous certified Final PEIR, new CEQA Findings and/or Statement of Overriding Considerations are not required.

The project would not result in any new significant impacts nor would it result in an increase in the severity of significant impacts identified in the previously certified FPA PEIR.

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

The project shall be required to comply with the applicable mitigation measures outlined within the Mitigation Monitoring and Reporting Program (MMRP) of the previously certified PEIR (No. 346289/SCH No. 2013111017), as applicable, and those identified with the project-specific subsequent technical studies. The following MMRP measures specifically apply to this project.

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

1. Prior to the issuance of a Notice To Proceed (NTP) for a subdivision, or any construction permits, such as Demolition, Grading or Building, or beginning any construction related activity on-site, the Development Services Department (DSD) Director's Environmental Designee (ED) shall review and approve all Construction Documents (CD), (plans, specification, details, etc.) to ensure the MMRP requirements are incorporated into the design.
2. In addition, the ED shall verify that the MMRP Conditions/Notes that apply ONLY to the construction phases of this project are included VERBATIM, under the heading, "ENVIRONMENTAL/MITIGATION REQUIREMENTS."
3. These notes must be shown within the first three (3) sheets of the construction documents in the format specified for engineering construction document templates as shown on the City website: <http://www.sandiego.gov/development-services/industry/standtemp.shtml>
4. The **TITLE INDEX SHEET** must also show on which pages the "Environmental/Mitigation Requirements" notes are provided.
5. **SURETY AND COST RECOVERY** – The Development Services Director or City Manager may require appropriate surety instruments or bonds from private Permit Holders to ensure the long-term performance or implementation of required mitigation measures or programs. The City is authorized to recover its cost to offset the salary, overhead, and expenses for City personnel and programs to monitor qualifying projects.

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

1. PRECONSTRUCTION MEETING IS REQUIRED TEN (10) WORKING DAYS PRIOR TO BEGINNING ANY WORK ON THIS PROJECT. The PERMIT HOLDER/OWNER is responsible to arrange and perform this meeting by contacting the CITY RESIDENT ENGINEER (RE) of the Field Engineering Division and City staff from MITIGATION MONITORING COORDINATION (MMC). Attendees must also include the Permit holder's Representative(s), Job Site Superintendent and the following consultants: ***Qualified Biologist, Qualified Archaeologist, and Native American Monitor.***

Note: Failure of all responsible Permit Holder's representatives and consultants to attend shall require an additional meeting with all parties present.

CONTACT INFORMATION:

- a) The PRIMARY POINT OF CONTACT is the RE at the Field Engineering Division, 858-627-3200.
- b) For Clarification of ENVIRONMENTAL REQUIREMENTS, it is also required to call RE and MMC at 858-627-3360.

2. **MMRP COMPLIANCE:** This Project, Project Tracking System (PTS) No. 671912 and/or Environmental Document No. 671912, shall conform to the mitigation requirements contained in the associated Environmental Document and implemented to the satisfaction of the DSD's Environmental Designee (MMC) and the City Engineer (RE). The requirements may not be reduced or changed but may be annotated (i.e. to explain when and how compliance is being met and location of verifying proof, etc.). Additional clarifying information may also be added to other relevant plan sheets and/or specifications as appropriate (i.e., specific locations, times of monitoring, methodology, etc.).

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

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

- 404 Permit from U.S. Army Corps of Engineers,
- 401 Certification from Regional Water Quality Control Board, and a
- 1602 Streambed Alteration Agreement from the California Department of Fish and Wildlife.

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

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

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

Document Submittal/Inspection Checklist		
Issue Area	Document Submittal	Associated Inspection/Approvals/Notes
General	Consultant Qualification Letters	Prior to Preconstruction Meeting
General	Consultant Construction Monitoring Exhibits	Prior to or at Preconstruction Meeting
Biology	Consultant Qualification Letters	Prior to Preconstruction Meeting
Biology	Biology Reports	Biology/Habitat Restoration Inspection
Noise	Acoustical Reports	Prior to Occupancy
Traffic	Traffic Reports	Traffic Features Site Observation
Bond Release	Request for Bond Release Letter	Final MMRP Inspections Prior to Bond Release Letter

C. SPECIFIC MMRP ISSUE AREA CONDITIONS/REQUIREMENTS

BIOLOGICAL RESOURCES (PROXIMITY TO SENSITIVE BIOLOGICAL RESOURCES)

I. Prior to Construction

- A. **Biologist Verification:** The owner/permittee shall provide a letter to the City's Mitigation Monitoring Coordination (MMC) section stating that a Project Biologist (Qualified Biologist) as defined in the City of San Diego's Biological Guidelines (2018), has been retained to implement the project's biological monitoring program. The letter shall include the names and contact information of all persons involved in the biological monitoring of the project.
- B. **Preconstruction Meeting:** The Qualified Biologist shall attend the preconstruction meeting, discuss the project's biological monitoring program, and arrange to perform any follow up mitigation measures and reporting including site-specific monitoring, restoration or revegetation, and additional fauna/flora surveys/salvage.
- C. **Biological Documents:** The Qualified Biologist shall submit all required documentation to MMC verifying that any special mitigation reports including but not limited to, maps, plans, surveys, survey timelines, or buffers are completed or scheduled per City Biology Guidelines, Multiple Species Conservation Program (MSCP), Environmentally Sensitive Lands Ordinance (ESL), project permit conditions; California Environmental Quality Act (CEQA); endangered species acts (ESAs); and/or other local, state or federal requirements.
- D. **BCME:** The Qualified Biologist shall present a Biological Construction Mitigation/Monitoring Exhibit (BCME) which includes the biological documents in C above. In addition, include: restoration/revegetation plans, plant salvage/relocation requirements (e.g., coastal cactus wren plant salvage, burrowing owl exclusions, etc.), avian or other wildlife surveys/survey schedules (including general avian nesting and USFWS protocol), timing of surveys, wetland buffers, avian construction avoidance areas/noise buffers/ barriers, other impact avoidance areas, and any subsequent requirements determined by the Qualified Biologist and the City ADD/MMC. The BCME shall include a site plan, written and graphic depiction of the project's

biological mitigation/monitoring program, and a schedule. The BCME shall be approved by and referenced in the construction documents.

- E. **Resource Delineation:** Prior to construction activities, the Qualified Biologist shall supervise the placement of orange construction fencing or equivalent along the limits of disturbance adjacent to sensitive biological habitats and verify compliance with any other project conditions as shown on the BCME. This phase shall include flagging plant specimens and delimiting buffers to protect sensitive biological resources (e.g., habitats/flora & fauna species, including nesting birds) during construction. Appropriate steps/care should be taken to minimize attraction of nest predators to the site.
- F. **Education:** Prior to commencement of construction activities, the Qualified Biologist shall meet with the owner/permittee or designee and the construction crew and conduct an on-site educational session regarding the need to avoid impacts outside of the approved construction area and to protect sensitive flora and fauna (e.g., explain the avian and wetland buffers, flag system for removal of invasive species or retention of sensitive plants, and clarify acceptable access routes/methods and staging areas, etc.).

II. During Construction

- A. **Monitoring:** All construction (including access/staging areas) shall be restricted to areas previously identified, proposed for development/staging, or previously disturbed as shown on "Exhibit A" and/or the BCME. The Qualified Biologist shall monitor construction activities as needed to ensure that construction activities do not encroach into biologically sensitive areas, or cause other similar damage, and that the work plan has been amended to accommodate any sensitive species located during the pre-construction surveys. In addition, the Qualified Biologist shall document field activity via the Consultant Site Visit Record (CSVR). The CSVR shall be e-mailed to MMC on the 1st day of monitoring, the 1st week of each month, the last day of monitoring, and immediately in the case of any undocumented condition or discovery.
- B. **Subsequent Resource Identification:** The Qualified Biologist shall note/act to prevent any new disturbances to habitat, flora, and/or fauna onsite (e.g., flag plant specimens for avoidance during access, etc). If active avian nests of avian or other previously unknown sensitive resources are detected, all project activities that directly impact the resource shall be delayed until species specific local, state or federal regulations have been determined and applied by the Qualified Biologist.

III. Post Construction Measures

- A. In the event that impacts exceed previously allowed amounts, additional impacts shall be mitigated in accordance with City Biology Guidelines, ESL and MSCP, State CEQA, and other applicable local, state and federal law. The Qualified Biologist shall submit a final BCME/report to the satisfaction of the City ADD/MMC within 30 days of construction completion.

BIOLOGICAL RESOURCES (WETLANDS)

Prior to issuance of any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits, but prior to the first preconstruction meeting, the Owner/Permittee shall mitigate for City wetland/riparian vegetation impacts to 0.29 acre of

Arundo dominated wetland, 0.21 acre of disturbed wetland, and 0.11 acre of southern riparian woodland. Mitigation for impacts to City jurisdictional wetlands shall occur at a 3:1 mitigation-to-impact ratio in accordance with Table 2a of the City's Biology Guidelines. Accordingly, mitigation for City wetland/riparian impacts shall include a 1:1 creation component to ensure no net loss of wetlands and a 2:1 restoration/enhancement component. The Owner/Permitee shall provide 0.599 acre of habitat and shall be achieved on-site via the following, as detailed in the *Alvarado Creek Habitat Mitigation and Monitoring Plan* (Blackhawk Environmental, Inc. June 2, 2022):

- Creation of 0.183-acre of riparian habitat
- Restoration of 0.217- acre of riparian habitat
- Enhancement of 0.199-acre riparian habitat

BIOLOGICAL RESOURCES (OTHER RESOURCES AGENCY PERMITS)

Prior to issuance of any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits, but prior to the first preconstruction meeting, the Owner/Permitee shall provide evidence of the following permits:

- 404 permit from U.S. Army Corps of Engineers,
- 401 Certification from Regional Water Quality Control Board, and a
- 1602 streambed alteration agreement from the California Department of Fish and Wildlife.

Evidence shall include copies of permit(s) issued, letter of resolution(s) by the responsible agency documenting compliance, or other evidence documenting compliance deemed acceptable by DSD/MMC.

BIOLOGICAL RESOURCES (RESTORATION/ENHANCEMENT PLAN)

Prior to the issuance of a Notice to Proceed (NTP) or any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits the Assistant Deputy Director (ADD) environmental designee of the City's Land Development Review Division (LDR) shall verify that the following statement is shown on the grading and/or construction plans as a note under the heading *Environmental Requirements*: "Alvarado Creek Apartments" is subject to Mitigation, Monitoring and Reporting Program and shall conform to the mitigation conditions as contained in Addendum to EIR No.346289/SCH. No. 2013111017.

Prior to Permit Issuance

A. Land Development Review (LDR) Plan Check

1. Prior to NTP or issuance for any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits, whichever is applicable, the ADD environmental designee shall verify that the requirements for the revegetation/restoration plans and specifications, including mitigation of direct impacts to 0.283-acre of city wetlands with 0.599-acre of restoration, creation and enhancement have been shown and noted on the appropriate landscape construction documents. The landscape construction documents and specifications must be found to be in conformance with the Habitat Restoration Plan prepared by (Blackhawk Environmental, Inc., June 2, 2022), the requirements of which are summarized below:

B. Revegetation/Restoration Plan(s) and Specifications

1. Landscape Construction Documents (LCD) shall be prepared on D-sheets and submitted to the City of San Diego Development Services Department, Landscape Architecture Section (LAS) for review and approval. LAS shall consult with Mitigation Monitoring Coordination (MMC) and obtain concurrence prior to approval of LCD. The LCD shall consist of revegetation/restoration, planting, irrigation and erosion control plans; including all required graphics, notes, details, specifications, letters, and reports as outlined below.
2. Landscape Revegetation/Restoration Planting and Irrigation Plans shall be prepared in accordance with the San Diego Land Development Code (LDC) Chapter 14, Article 2, Division 4, the LDC Landscape Standards submittal requirements, and Attachment "B" (General Outline for Revegetation/Restoration Plans) of the City of San Diego's LDC Biology Guidelines (July 2002). The Principal Qualified Biologist (PQB) shall identify and adequately document all pertinent information concerning the revegetation/restoration goals and requirements, such as but not limited to, plant/seed palettes, timing of installation, plant installation specifications, method of watering, protection of adjacent habitat, erosion and sediment control, performance/success criteria, inspection schedule by City staff, document submittals, reporting schedule, etc. The LCD shall also include comprehensive graphics and notes addressing the ongoing maintenance requirements (after final acceptance by the City).
3. The Revegetation Installation Contractor (RIC), Revegetation Maintenance Contractor (RMC), Construction Manager (CM) and Grading Contractor (GC), where applicable shall be responsible to insure that for all grading and contouring, clearing and grubbing, installation of plant materials, and any necessary maintenance activities or remedial actions required during installation and the 120 day plant establishment period are done per approved LCD. The following procedures at a minimum, but not limited to, shall be performed:
 - a. The RMC shall be responsible for the maintenance of the upland mitigation area for a minimum period of 120 days. Maintenance visits shall be conducted on a weekly basis throughout the plant establishment period.
 - b. At the end of the 120-day period the PQB shall review the mitigation area to assess the completion of the short-term plant establishment period and submit a report for approval by MMC.
 - c. MMC will provide approval in writing to begin the five-year long-term establishment/maintenance and monitoring program.
 - d. Existing indigenous/native species shall not be pruned, thinned or cleared in the revegetation/mitigation area.
 - e. The revegetation site shall not be fertilized.
 - f. The RIC is responsible for reseeding (if applicable) if weeds are not removed, within one week of written recommendation by the PQB.
 - g. Weed control measures shall include the following: (1) hand removal, (2) cutting, with power equipment, and (3) chemical control. Hand removal of weeds is the most desirable method of control and will be used wherever possible.
 - h. Damaged areas shall be repaired immediately by the RIC/RMC. Insect infestations, plant diseases, herbivory, and other pest problems will be closely monitored throughout the five-year maintenance period. Protective mechanisms such as metal wire netting shall be used as necessary. Diseased and infected plants shall be immediately disposed of off-site in a legally acceptable manner at the discretion of the PQB or Qualified Biological

Monitor (QBM) (City approved). Where possible, biological controls will be used instead of pesticides and herbicides.

4. If a Brush Management Program is required the revegetation/restoration plan shall show the dimensions of each brush management zone and notes shall be provided describing the restrictions on planting and maintenance and identify that the area is impact neutral and shall not be used for habitat mitigation/credit purposes.

C. Letters of Qualification Have Been Submitted to ADD

1. The applicant shall submit, for approval, a letter verifying the qualifications of the biological professional to MMC. This letter shall identify the PQB, Principal Restoration Specialist (PRS), and QBM, where applicable, and the names of all other persons involved in the implementation of the revegetation/restoration plan and biological monitoring program, as they are defined in the City of San Diego Biological Review References. Resumes and the biology worksheet should be updated annually.
2. MMC will provide a letter to the applicant confirming the qualifications of the PQB/PRS/QBM and all City Approved persons involved in the revegetation/restoration plan and biological monitoring of the project.
3. Prior to the start of work, the applicant must obtain approval from MMC for any personnel changes associated with the revegetation/restoration plan and biological monitoring of the project.
4. PBQ must also submit evidence to MMC that the PQB/QBM has completed Storm Water Pollution Prevention Program (SWPPP) training.

Prior to Start of Construction

A. PQB/PRS Shall Attend Preconstruction (Precon) Meetings

1. Prior to beginning any work that requires monitoring:
 - a. The owner/permittee or their authorized representative shall arrange and perform a Precon Meeting that shall include the PQB or PRS, Construction Manager (CM) and/or Grading Contractor (GC), Landscape Architect (LA), Revegetation Installation Contractor (RIC), Revegetation Maintenance Contractor (RMC), Resident Engineer (RE), Building Inspector (BI), if appropriate, and MMC.
 - b. The PQB shall also attend any other grading/excavation related Precon Meetings to make comments and/or suggestions concerning the revegetation/restoration plan(s) and specifications with the RIC, CM and/or GC.
 - c. If the PQB is unable to attend the Precon Meeting, the owner shall schedule a focused Precon Meeting with MMC, PQB/PRS, CM, BI, LA, RIC, RMC, RE and/or BI, if appropriate, prior to the start of any work associated with the revegetation/ restoration phase of the project, including site grading preparation.
2. Where Revegetation/Restoration Work Will Occur
 - a. Prior to the start of any work, the PQB/PRS shall also submit a revegetation/restoration monitoring exhibit (RRME) based on the appropriate reduced LCD (reduced to 11"x 17"

- format) to MMC, and the RE, identifying the areas to be revegetated/restored including the delineation of the limits of any disturbance/grading and any excavation.
 - b. PQB shall coordinate with the construction superintendent to identify appropriate Best Management Practices (BMP's) on the RRME.
3. When Biological Monitoring Will Occur
 - a. Prior to the start of any work, the PQB/PRS shall also submit a monitoring procedures schedule to MMC and the RE indicating when and where biological monitoring and related activities will occur.
 4. PQB Shall Contact MMC to Request Modification
 - a. The PQB may submit a detailed letter to MMC prior to the start of work or during construction requesting a modification to the revegetation/restoration plans and specifications. This request shall be based on relevant information (such as other sensitive species not listed by federal and/or state agencies and/or not covered by the MSCP and to which any impacts may be considered significant under CEQA) which may reduce or increase the potential for biological resources to be present.

During Construction

- A. PQB or QBM Present During Construction/Grading/Planting
 1. The PQB or QBM shall be present full-time during construction activities including but not limited to, site preparation, cleaning, grading, excavation, landscape establishment in association with project site and Alvarado Creek restoration grading activities which could result in impacts to sensitive biological resources as identified in the LCD and on the RRME.
The RIC and/or QBM are responsible for notifying the PQB/PRS of changes to any approved construction plans, procedures, and/or activities. The PQB/PRS is responsible to notify the CM, LA, RE, BI and MMC of the changes.
 2. The PQB or QBM shall document field activity via the Consultant Site Visit Record Forms (CSVr). The CSVr's shall be faxed by the CM the first day of monitoring, the last day of monitoring, monthly, and in the event that there is a deviation from conditions identified within the LCD and/or biological monitoring program. The RE shall forward copies to MMC.
 3. The PQB or QBM shall be responsible for maintaining and submitting the CSVr at the time that CM responsibilities end (i.e., upon the completion of construction activity other than that of associated with biology).
 4. All construction activities (including staging areas) shall be restricted to the development areas as shown on the LCD. The PQB/PRS or QBM staff shall monitor construction activities as needed, with MMC concurrence on method and schedule. This is to ensure that construction activities do not encroach into biologically sensitive areas beyond the limits of disturbance as shown on the approved LCD.
 5. The PQB or QBM shall supervise the placement of orange construction fencing or City approved equivalent, along the limits of potential disturbance adjacent to (or at the edge of) all sensitive habitats including all riparian habitat, as shown on the approved LCD.

6. The PBQ shall provide a letter to MMC that limits of potential disturbance has been surveyed, staked and that the construction fencing is installed properly.
7. The PQB or QBM shall oversee implementation of BMP's, such as gravel bags, straw logs, silt fences or equivalent erosion control measures, as needed to ensure prevention of any significant sediment transport. In addition, the PQB/QBM shall be responsible to verify the removal of all temporary construction BMP's upon completion of construction activities. Removal of temporary construction BMP's shall be verified in writing on the final construction phase CSV.
8. PQB shall verify in writing on the CSV's that no trash stockpiling or oil dumping, fueling of equipment, storage of hazardous wastes or construction equipment/material, parking or other construction related activities shall occur adjacent to sensitive habitat. These activities shall occur only within the designated staging area located outside the area defined as biological sensitive area.
9. The long-term establishment inspection and reporting schedule per LCD must all be approved by MMC prior to the issuance of the Notice of Completion (NOC) or any bond release.

B. Disturbance/Discovery Notification Process

1. If unauthorized disturbances occurs or sensitive biological resources are discovered that where not previously identified on the LCD and/or RRME, the PQB or QBM shall direct the contractor to temporarily divert construction in the area of disturbance or discovery and immediately notify the RE or BI, as appropriate.
2. The PQB shall also immediately notify MMC by telephone of the disturbance and report the nature and extent of the disturbance and recommend the method of additional protection, such as fencing and appropriate Best Management Practices (BMP's). After obtaining concurrence with MMC and the RE, PQB and CM shall install the approved protection and agreement on BMP's.
3. The PQB shall also submit written documentation of the disturbance to MMC within 24 hours by fax or email with photos of the resource in context (e.g., show adjacent vegetation).

C. Determination of Significance

1. The PQB shall evaluate the significance of disturbance and/or discovered biological resource and provide a detailed analysis and recommendation in a letter report with the appropriate photo documentation to MMC to obtain concurrence and formulate a plan of action which can include fines, fees, and supplemental mitigation costs.
2. MMC shall review this letter report and provide the RE with MMC's recommendations and procedures.

Post Construction

A. Mitigation Monitoring and Reporting Period

1. Five-Year Mitigation Establishment/Maintenance Period

- a. The RMC shall be retained to complete maintenance monitoring activities throughout the five-year mitigation monitoring period.
- b. Maintenance visits will be conducted twice per month for the first six months, once per month for the remainder of the first year, and quarterly thereafter.
- c. Maintenance activities will include all items described in the LCD.
- d. Plant replacement will be conducted as recommended by the PQB (note: plants shall be increased in container size relative to the time of initial installation or establishment or maintenance period may be extended to the satisfaction of MMC).

2. Five-Year Biological Monitoring

- a. All biological monitoring and reporting shall be conducted by a PQB or QBM, as appropriate, consistent with the LCD.
- b. Monitoring shall involve both qualitative horticultural monitoring and quantitative monitoring (i.e., performance/success criteria). Horticultural monitoring shall focus on soil conditions (e.g., moisture and fertility), container plant health, seed germination rates, presence of native and non-native (e.g., invasive exotic) species, any significant disease or pest problems, irrigation repair and scheduling, trash removal, illegal trespass, and any erosion problems.
- c. After plant installation is complete, qualitative monitoring surveys will occur monthly during year one and quarterly during years two through five.
- d. Upon the completion of the 120-days short-term plant establishment period, quantitative monitoring surveys shall be conducted at 0, 6, 12, 24, 36, 48 and 60 months by the PQB or QBM. The revegetation/restoration effort shall be quantitatively evaluated once per year (in spring) during years three through five, to determine compliance with the performance standards identified on the LCD. All plant material must have survived without supplemental irrigation for the last two years.
- e. Quantitative monitoring shall include the use of fixed transects and photo points to determine the vegetative cover within the revegetated habitat. Collection of fixed transect data within the revegetation/restoration site shall result in the calculation of percent cover for each plant species present, percent cover of target vegetation, tree height and diameter at breast height (if applicable) and percent cover of non-native/noninvasive vegetation. Container plants will also be counted to determine percent survivorship. The data will be used determine attainment of performance/success criteria identified within the LCD.
- f. Biological monitoring requirements may be reduced if, before the end of the fifth year, the revegetation meets the fifth-year criteria and the irrigation has been terminated for a period of the last two years.
- g. The PQB or QBM shall oversee implementation of post-construction BMP's, such as gravel bags, straw logs, silt fences or equivalent erosion control measure, as needed to ensure prevention of any significant sediment transport. In addition, the PBQ/QBM shall be responsible to verify the removal of all temporary post-construction BMP's upon completion of construction activities. Removal of temporary post-construction BMPs shall be verified in writing on the final post-construction phase CSV.

B. Submittal of Draft Monitoring Report

- 1. A draft monitoring letter report shall be prepared to document the completion of the 120-day plant establishment period. The report shall include discussion on weed control, horticultural treatments (pruning, mulching, and disease control), erosion control,

trash/debris removal, replacement planting/reseeding, site protection/signage, pest management, vandalism, and irrigation maintenance. The revegetation/restoration effort shall be visually assessed at the end of 120-day period to determine mortality of individuals.

2. The PQB shall submit two copies of the Draft Monitoring Report which describes the results, analysis, and conclusions of all phases of the Biological Monitoring and Reporting Program (with appropriate graphics) to MMC for review and approval within 30 days following the completion of monitoring. Monitoring reports shall be prepared on an annual basis for a period of five years. Site progress reports shall be prepared by the PQB following each site visit and provided to the owner, RMC and RIC. Site progress reports shall review maintenance activities, qualitative and quantitative (when appropriate) monitoring results including progress of the revegetation relative to the performance/success criteria, and the need for any remedial measures.
 3. Draft annual reports (three copies) summarizing the results of each progress report including quantitative monitoring results and photographs taken from permanent viewpoints shall be submitted to MMC for review and approval within 30 days following the completion of monitoring.
 4. MMC shall return the Draft Monitoring Report to the PQB for revision or, for preparation of each report.
 5. The PQB shall submit revised Monitoring Report to MMC (with a copy to RE) for approval within 30 days.
 6. MMC will provide written acceptance of the PQB and RE of the approved report.
- C. Final Monitoring Reports(s)
1. PQB shall prepare a Final Monitoring upon achievement of the fifth-year performance/success criteria and completion of the five-year maintenance period.
 - a. This report may occur before the end of the fifth year if the revegetation meets the fifth-year performance /success criteria and the irrigation has been terminated for a period of the last two years.
 - b. The Final Monitoring report shall be submitted to MMC for evaluation of the success of the mitigation effort and final acceptance. A request for a pre-final inspection shall be submitted at this time, MMC will schedule after review of report.
 - c. If at the end of the five years any of the revegetated area fails to meet the project's final success standards, the applicant must consult with MMC. This consultation shall take place to determine whether the revegetation effort is acceptable. The applicant understands that failure of any significant portion of the revegetation/restoration area may result in a requirement to replace or renegotiate that portion of the site and/or extend the monitoring and establishment/maintenance period until all success standards are met.

BIOLOGICAL RESOURCES (COVENANT OF EASEMENT)

Prior to the final acceptance by DSD/MMC of Final Monitoring Report provided at year five of the monitoring period (this report may occur before the end of the fifth year if the revegetation meets the fifth-year performance /success criteria and the irrigation has been terminated for a period of

the last two years), a covenant of easement shall be provided over the wetland mitigation area to the satisfaction of DSD/MMC. The covenant of easement shall specifically prohibit activities in the wetland mitigation areas that will affect biological value, as follows: Alvarado Creek Habitat Mitigation and Monitoring Plan (Blackhawk Environmental, Inc., June 2, 2022).

BIOLOGICAL RESOURCES HABITAT MANAGEMENT ENTITY)

Prior to the final acceptance by DSD/MMC of Final Monitoring Report provided at year five of the monitoring period (this report may occur before the end of the fifth year if the revegetation meets the fifth-year performance /success criteria and the irrigation has been terminated for a period of the last two years), the applicant shall provide documentation of an executed agreement with a qualified habitat management entity that provides for the implementation of the long-term management of the wetland and upland mitigation areas in perpetuity in accordance with the Alvarado Creek Habitat Mitigation and Monitoring Plan (Blackhawk Environmental, Inc., June 2, 2022) to the satisfaction of DSD/MMC.

BIOLOGICAL RESOURCES (LONG-TERM MANAGEMENT PLAN/PAR)

Prior to the final acceptance by DSD/MMC of Final Monitoring Report provided at year five of the monitoring period (this report may occur before the end of the fifth year if the revegetation meets the fifth-year performance /success criteria and the irrigation has been terminated for a period of the last two years), the applicant shall provide an endowment to adequately fund the estimated annual costs associated with the long-term management tasks identified in the Alvarado Creek Habitat Mitigation and Monitoring Plan (Blackhawk Environmental, Inc., June 2, 2022). These tasks consist of annual sensitive vegetation monitoring, sensitive species monitoring, exotic species control, public awareness, trespass monitoring and management, trash monitoring and management, and reporting and administration. The endowment amount shall be calculated via a Property Analysis Record (PAR) analysis completed by the qualified habitat management entity (such as the San Diego Foundation), to the satisfaction of the DSD/MMC.

NOISE

Prior to the certificate of occupancy issuance, the Owner Permittee shall demonstrate to the satisfaction of the City of San Diego Planning Department Manager that the following interior noise-reducing features are implemented.

- Air conditioning or mechanical ventilation
- Double-paned glass
- Solid core doors with weather stripping and seals
- Stucco or brick veneer exterior walls or wood siding with one-half inch thick fiberboard underlays
- Glass portions of windows/doors not to exceed 20 percent
- Window assemblies, doors, wall construction materials, and insulation shall have a lab tested STC rating of 30 or greater.

TRANSPORTATION/CIRCULATION

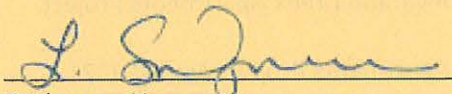
MM-T-1: The following nine VMT reduction mitigation measures shall be implemented by the proposed project prior to the issuance of the certificate of occupancy.

VMT Reduction Mitigation Measures – Mobility Choices Opt-In					
#	VMT Reduction Measure	Description	Unit or Yes/No	Points /Unit	Notes
PEDESTRIAN MEASURES					
Prior to first building permit, the project shall implement the following VMT Reduction Measures (1 – 7) which would achieve 9.8 reduction points required by the Mobility Choices Ordinance, satisfactory to the City Engineer.					
1	Installing high-visibility crosswalk striping adjacent intersection (if not otherwise required)	The project will install high visibility crosswalks for the northbound, southbound and westbound approaches at the intersection of Mission Gorge Road/Mission Gorge Place	Full Intersection	1.13	
2	Installing high-visibility crosswalk striping adjacent intersection (if not otherwise required)	The project will install high visibility crosswalks at all four approaches at Mission Gorge Road/Twain Avenue intersection	Full Intersection	1.50	
3	Installing high-visibility crosswalk striping adjacent intersection (if not otherwise required)	The project will install high visibility crosswalks along the north, east and west approaches at Mission Gorge Road/Vandever Avenue intersection	Full Intersection	1.13	
4	Signal pedestrian countdown heads (if not otherwise required)	The project will modify the traffic signal to include pedestrian countdown signal heads at the intersection of Mission Gorge Road/Mission Gorge Place Intersection	Each Intersection	2.00	
5	Signal pedestrian countdown heads (if not otherwise required)	The project will modify the traffic signal to include pedestrian countdown signal heads at Mission Gorge Road/Twain Avenue intersection	Each Intersection	2.00	
6	Signal pedestrian countdown heads (if not otherwise required)	The project will modify the traffic signal to include pedestrian countdown signal heads at Mission Gorge Road/Vandever Avenue intersection	Each Intersection	2.00	
7	Widening sidewalk within the existing public right-of-way to Street Design Manual Standards	The project will construct 10-foot wide contiguous sidewalk along the project site frontage along Mission Gorge Road.	Each mile of widening	0.04	3 points per mile

VMT Reduction Mitigation Measures – Mobility Choices Opt-In					
#	VMT Reduction Measure	Description	Unit or Yes/No	Points /Unit	Notes
BICYCLE SUPPORTIVE MEASURES					
Prior to first occupancy, the project shall implement the following VMT Reduction Measures (8 and 9) which would achieve 2.51 reduction points required by the Mobility Choices Ordinance, satisfactory to the City Engineer.					
8	Providing onsite shared bicycle fleet	The project will provide on-site bike sharing (up to 4 bikes for tenant's short-term use on a reservation basis)	Yes	1.50	
9	Installing new bicycle infrastructure (Class I, II, IV) that is part of the City's planned bikeway network that closes or incrementally closes an existing gap between existing bikeways	The project will construct Class II bike lanes along the project frontage on Mission Gorge between Fairmount Avenue and Mission Gorge Place on both sides of street.	Each mile	1.01	3 points per mile
TOTAL PROJECT VMT REDUCTION MEASURE POINTS				12.31	
Source: Appendix T, City of San Diego Mobility Choices Regulations (Ordinance No. 21274, Dated Dec 9, 2020).					

IX. CERTIFICATION

Copies of the addendum, the certified FPA PEIR, the MMRP, and associated project-specific technical appendices, if any, may be accessed on the City's CEQA webpage at <https://www.sandiego.gov/ceqa/final>



E. Shearer Nguyen
Program Manager
Development Services Department

August 4, 2022
Date of Final Report

Attachments: Figure 1: Regional Location
Figure 2: Project Vicinity
Figure 3: Site Plan
Figure 4: Project Elevation/Perspective

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Source: 2014, SanGIS; City of San Diego Planning Dept, 2014.

Figure 1: Regional Location



Source: 2014, SanGIS; City of San Diego Planning Dept, 2014.

Figure 2: Project Vicinity



Source: Image prepared by AO Architects in 2021, adapted by Ascent Environmental in 2022.

Figure 4: Project Elevation/Perspective

Appendices

Appendix A - Vehicle Miles Traveled (VMT) Traffic Analysis

Appendix B – Air Quality Assessment

Appendix C – Climate Action Plan (CAP) Checklist

Appendix D – Noise Assessment

Appendix E – Biological Assessment

Appendix F – Habitat Mitigation and Monitoring Plan (HMMP)

Appendix G – Long Term Management Plan (LTMP) and Project Analysis Record (PAR)

Appendix H – Hydrology Study

Appendix I – Water Quality Management Plan (WQMP)

Appendix J – Historic Resources Evaluation

Appendix K – Geotechnical Evaluation