



THE CITY OF SAN DIEGO

ADDENDUM

Project No. 600700
Addendum to EIR No. 386029
SCH No. 2014051075

SUBJECT: ACCESS YOUTH ACADEMY: A request for a NEIGHBORHOOD DEVELOPMENT PERMIT to demolish existing hardscape, including concrete slab, asphalt pavement and a retaining wall on a vacant lot, and construct a two-story commercial mixed-use building consisting of classrooms, office spaces, squash courts and a conference room totaling approximately 21,630-square-feet. Furthermore, the project would construct associated site improvements (i.e. hardscape, retaining walls, and landscaping). Deviations from applicable regulations for front setback, transparency and parking are also being requested. The project would conform to the Affordable/In-Fill Housing and Sustainable Buildings Expedite Program by generating 50 percent or more of the projected total energy consumption on-site through renewable energy resources (i.e. photovoltaic). The 0.84-acre vacant project site is located at 704 Euclid Avenue. The project site is designated Neighborhood Mixed-Use-Low (ranging from 15 – 29 dwelling units per acre) per the Encanto Neighborhoods Community Plan and is zoned CN-1-3 (Commercial – Neighborhood, allows development with a pedestrian orientation and permits a maximum density of 1 dwelling unit for each 1,500 square feet of lot area) within the Village District. Additionally, the project site is within the Airport Influence Areas (San Diego International Airport) Review Area 2 and the Community Plan Implementation Overlay Zone (CPIOZ-A). (LEGAL DESCRIPTION: Parcel 1 of Parcel Map No. 2407, in the City of San Diego, County of San Diego, State of California, filed in the Office of the County Recorder of San Diego County, March 1, 1974 as Filed No. 74-052713 of official records.) APPLICANT: David Lam.

I. SUMMARY OF ORIGINAL PROJECT

The project site lies within the boundaries of the Southeastern San Diego (SESD) and Encanto Neighborhoods Community Plan Updates (CPU) Project Program Environmental Impact Report (EIR) No. 386029 / SCH No. 2014051075, which was certified by the City Council on December 2, 2015 via Resolution No. 310077. The SESD and Encanto Neighborhoods CPU project involved an update to the SESD Community Plan, adoption of a new community plan for the Encanto Neighborhoods, a General Plan Amendment, Rescission of the Southeastern San Diego Planned District Ordinance (SESDPDO) and the Mt. Hope Planned District Ordinance (MHPDO), amendments to the City's Land Development Code (LDC), adoption of a Rezone Ordinance to replace the SESD and Mt. Hope PDOs

with citywide zoning, adoption of a Community Plan Implementation Overlay Zone (CPIOZ), and approval of an Impact Fee Study (IFS).

The SESD and Encanto Neighborhoods CPU (CPUs) provides a long-range, comprehensive policy framework for growth and development in the SESD and Encanto Neighborhoods communities through 2035. The CPUs provide detailed neighborhood-specific land use, development regulations (zoning) that are consistent with city-wide zoning classifications, development design guidelines, and numerous other mobility and public realm guidelines, incentives, and programs to revitalize the urban core in accordance with the general goals stated in the General Plan. The CPUs additionally serves as the basis for guiding a variety of other actions, such as parkland acquisitions and transportation improvements.

Guided by citywide policy direction contained within the General Plan (adopted by the City Council on March 8, 2008), the updated community plans identify land use strategies with new land use designation proposals to create villages along major transportation corridors, as well as other enhancements to the existing planning area.

The SESD and Encanto Neighborhoods CPU Project Program EIR concluded that the project would result in significant environmental impacts to Air Quality, Transportation/Circulation and Noise that would be significant and unmitigated. The following issue areas were determined to be significant but mitigated to below a level of significance with mitigation: Land Use, Transportation/Circulation, Air Quality, Noise, Biological Resources, Hydrology/Water Quality, Historical Resources, Paleontological Resources, and Geology. All other impacts analyzed in the Draft EIR were determined to be less than significant.

Additionally, the Euclid Avenue Gateway Master Plan (2014) was prepared in coordination and concurrently with the Encanto Neighborhoods Community Plan Update. The purpose of the Master Plan is to address the segment of Euclid Avenue that extends from SR-94 south to Guymon Street in the Encanto Neighborhoods Community Planning area. The mix of land uses and densities in this master plan has been proposed to enhance connectivity to residential areas, schools, parks, recreation, shopping and other commercial activities within the Encanto Neighborhoods Community. The Master Plan recommends a mixed-use development on the project site as well as connecting Hilltop Drive along the southern boundary of the project site to Euclid Avenue to improve connectivity in the planning area.

II. PROJECT DESCRIPTION

A request for a NEIGHBORHOOD DEVELOPMENT PERMIT to demolish existing hardscape, including concrete slab, asphalt pavement and a retaining wall on a vacant lot, and construct a two-story commercial mixed-use building consisting of classrooms, office spaces, squash courts and a conference room totaling approximately 21,630-square-feet.

The project would provide an after-school youth program that combines academic tutoring, coaching and mentoring along with competitive squash. In addition to the youth program, the development would be utilized for community events, workshops, and open play on the squash courts. Hours of operation would be from 8:00am to 10:00pm, Monday through Friday, and from 8:00am to 4:00pm, Saturday and Sunday.

The project would be divided into two wings. The north wing would consist of double height volumes with squash courts and locker rooms/restrooms. The south wing would contain the academic/business portion. The first floor of the southern wing would contain the classrooms, while the second floor would be a cold shell proposed for business tenant improvements. The southeast/east portion of the project site would be dedicated for on-site parking.

The project would conform to the Affordable/In-Fill Housing and Sustainable Buildings Expedite Program by generating 50 percent or more of the projected total energy consumption on-site through renewable energy resources (i.e. photovoltaic).

The project landscaping has been reviewed by City Landscape staff and would comply with all applicable City of San Diego Landscape ordinances and standards. Drainage would be directed into appropriate storm drain systems designated to carry surface runoff, which has been reviewed and accepted by City Engineering staff. Ingress to the project site would be via Guymon Street. All parking would be provided on-site.

Grading would entail approximately 600 cubic yards of cut with a maximum cut depth of three feet, and 600 cubic yards of fill with a maximum fill depth of two feet. There would be 0 cubic yards of import/export.

The Land Development Code (LDC), Section 143.0920 allows Affordable/In-fill housing and Sustainable Building projects to request deviations from applicable development regulations pursuant to a Neighborhood Development Permit decided in accordance with Process 2, provided that the findings in Section 126.0404(a) and the supplemental findings in Section 126.0404(b) through (h) are made. Deviations requested by the project include:

1. Front Setback – A deviation from San Diego Municipal Code (SDMC) Section 131.0543(a)(2), Diagram 131-05B to allow a maximum 10-foot front setback to 50 percent of the street frontage, where a maximum setback to 70 percent of the street frontage is required.
2. Transparency – A deviation from SDMC Section 131.0552 to allow the north portion of the east façade along Euclid Avenue to provide transparent, clear glass along the street frontage but not visible into a commercial use, where transparency is required.
3. Parking – A deviation from SDMC Section 142.0530 to allow 35 parking spaces, where 46 are required

III. ENVIRONMENTAL SETTING

The 0.84-acre vacant project site is located at 704 Euclid Avenue, west of Euclid Avenue and north of Guymon Street. Existing site improvements consist of a playfield, basketball court and a paved parking lot. Vegetation on-site is varied and consists of grass and disturbed areas. The project site is bordered on the west by an ascending slope about 20 feet in height and inclined at about 2:1 (horizontal:vertical). Site elevations range from about 124 feet at the northwest corner of the site to about 120 feet at the southeast corner. Residential development is to the north and east of the project site. Commercial development is to the south of the project site. Horton Elementary School

is located to the west of the project site on Guymon Street. Additionally, the project site is situated in an area currently served by existing public services and utilities.

The project site is designated Neighborhood Mixed-Use-Low (ranging from 15 – 29 dwelling units per acre) per the Encanto Neighborhoods Community Plan and is zoned CN-1-3 (Commercial – Neighborhood, allows development with a pedestrian orientation and permits a maximum density of 1 dwelling unit for each 1,500 square feet of lot area) within the Village District. Additionally, the project site is within the Airport Influence Areas (San Diego International Airport) Review Area 2 and the Community Plan Implementation Overlay Zone (CPIOZ-A).

IV. ENVIRONMENTAL DETERMINATION

The City previously prepared and certified the SESD and Encanto Neighborhoods Community Plan Update Program Environmental Impact Report (PEIR) (No. 386029/SCH No. 20144051075) per Resolution No. R-310077 on December 2, 2015. Based on all available information and in light of the entire record, the analysis in this Addendum, and pursuant to Section 15162 and 15164 of the State CEQA Guidelines the City has determined the following:

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

- d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous environmental document 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 conditions 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 CEQA State Guidelines. The SESD and Encanto Neighborhoods Community Plan Updates Program EIR is incorporated by reference pursuant to CEQA Guidelines Section 15150. Public review of this Addendum is not required per CEQA.

V. IMPACT ANALYSIS

The following includes the environmental issues analyzed in detail in the previously certified Program EIR as well as the project-specific environmental analysis pursuant to the CEQA. The analysis in this document evaluates the adequacy of the Program EIR 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 SESD and Encanto Neighborhoods CPU Project Program EIR identified significant unmitigable impacts relative to Transportation/Circulation, Air Quality, and Noise.

The SESD and Encanto Neighborhoods CPU Project Program EIR identified significant but mitigated impacts to Land Use, Transportation/Circulation, Air Quality, Noise, Biological Resources, Hydrology/Water Quality, Historical Resources, Paleontological Resources, and Geology.

An overview of the Access Youth Academy project impacts in relation to the previously certified Program EIR is provided in Table 2, Impact Assessment Summary.

Table 1 Impact Assessment Summary				
Environmental Issues	2015 Program EIR Finding	Project	New Mitigation?	Project Resultant Impact
Land Use	Significant, but mitigated	No new impacts	No	Less than significant
Transportation	Significant, unavoidable	No new impacts	No	Less than significant
Air Quality	Significant, unavoidable	No new impacts	No	Less than significant
Noise	Significant, unavoidable	No new impacts	No	Significant, but mitigated with project-specific mitigation
Biological Resources	Less than significant with mitigation	No new impacts	No	No impact
Hydrology and Water Quality	Less than significant with Mitigation	No new impacts	No	Less than significant
Historical Resources	Less than significant with mitigation	No new impacts	No	No impact
Paleontological Resources	Less than significant with mitigation	No new impacts	No	No impact
Geology and Seismic Hazards	Less than significant with mitigation	No new impacts	No	Less than significant
Hazardous Materials	Less than significant	No new impacts	No	Less than significant
Greenhouse Gas Emissions	Less than significant	No new impacts	No	Less than significant
Energy	Less than significant	No new impacts	No	Less than significant
Public Services and Facilities	Less than significant	No new impacts	No	Less than significant
Public Utilities	Less than significant	No new impacts	No	Less than significant
Visual Effects and Neighborhood Character	Less than significant	No new impacts	No	Less than significant

Land Use

2015 Program EIR

Land Use is discussed in Section 5.1 of the 2015 Program EIR that concluded that implementation of the CPU would not result in impacts related to conflicts with the environmental goals, objectives or guidelines of the City of San Diego General Plan, community plans or other applicable land use plans.

The 2015 Program EIR identified that the development footprint of the CPU would encroach into sensitive environmentally sensitive lands (ESL) area. Additionally, implementation of the project would have the potential to result in significant impacts to historical resources given the presence of historical resources throughout the CPU area. However, future projects would require subsequent environmental review and compliance with CPU policies, development standards, as well as adherence to the ESL Regulations, Historical Resources Regulations, and site-specific mitigation, as applicable, in accordance with the mitigation framework.

Therefore, program-level impacts were concluded to be mitigated to below a level of significance.

Potentially significant impacts of future development on land designated as Multi-Habitat Plan Area (MHPA) by the City's Multiple Species Conservation Program (MSCP) Subarea Plan were identified in the program EIR. The impacts identified were associated with indirect impacts wherever development and human activity would interface with MHPA lands. The Program EIR concluded that impacts could be significant, but through compliance with established standards and regulations and as well as the mitigation framework would serve to reduce impacts to below a level of significance to MHPA Lands.

The planning area is located within Review Area 2 of the San Diego International Airport (SDIA) Airport Influence Area and is therefore subject to the SDIA Airport Land Use Compatibility Plan (ALUCP) and related airspace protection and applicable overflight policies and standards that apply. Therefore, through compliance with ALUCP impacts would be less than significant.

Overall, the 2015 Program EIR concluded that Land Use impacts would be less than significant with implementation of applicable policies, regulations, and the mitigation framework.

Project

The project site is designated Neighborhood Mixed-Use-Low (ranging from 15 – 29 dwelling units per acre) within the Euclid Avenue Gateway Master Plan of the Encanto Neighborhoods Community Plan and is zoned CN-1-3 within the Village District. The underlying base zone, CN-1-3, allows for Educational Facilities K-12, Commercial Services – Business Support, Commercial – Instructional Studios, Commercial – Personal Services, Private Clubs/Lodges/Fraternal Organizations, and Offices – Business & Professional. The project is a mixed-use building with tutoring, recreational, and administrative offices. The tutoring and administrative offices aspects of the project fall under Business & Professional Offices. The recreational portion, squash courts, of the project would fall under Assembly & Entertainment, Instructional Studios, or Personal Services. The project is consistent with the area designated for “Multiple Use” development by the general plan and the land use designation of the community plan, as well as with the underlying zone.

Although the project site is located within the Airport Influence Area (San Diego International Airport) Review Area 2 as depicted in the adopted 2014 Airport Land Use Compatibility Plan (ALUCP), the project would not result in a safety hazard residing in the project area. Only airspace protection and overflight policies and standards apply within Review Area 2. Further, the project site is not located in an area subject to ALUCP noise policies. Therefore, the project would not result in land uses that are incompatible with the adopted Airport Land Use Compatibility Plan.

The project site is within an urbanized area and contains existing site improvements, such as a playfield, basketball court and a paved parking lot. Vegetation on-site is varied and consists of non-native grass and disturbed areas. The project would not conflict with any applicable habitat conservation plan or natural community conservation plan. The project would not conflict with the City's Multiple Species Conservation Plan (MSCP), in that the site is not located within or adjacent to the Multi-Habitat Planning Area (MHPA). No significant impacts would occur, and no mitigation measures are required.

The project site is located within a low sensitivity area on the City of San Diego's Historical Resources Sensitivity Map. Based on the site-specific geotechnical report (SCST, Inc. August 2017), fill extends to depths varying from approximately three and half feet to eleven feet below grade. Therefore, there is no potential to impact any unique or non-unique historical resources.

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

Transportation/Circulation and Parking

2015 Program EIR

The Program EIR concluded that implementation of the CPU would result in significant impacts on the capacity of surface roads and freeways serving the community. These impacts were related to an increase in traffic which would be substantial in relation to existing traffic volumes and capacity of the streets and freeways. Mitigation measures, including potential street and intersection improvements (e.g., widening, restriping, and roadway diet), were identified.

The Program EIR identifies that future development would be required to comply with SDR-1 of the CPIOZ-A which would limit development on the site to no more than 1,000 ADT. A traffic study would be required to demonstrate that the proposed development would not exceed 1,000 ADT. If this trip limit were exceeded, the proposed development would be subject to additional traffic analysis and CEQA review.

The Program EIR concluded that implementation of the CPU would result in less than significant impacts caused by substantial alterations to present circulation movements including effects on existing public access areas.

The Program EIR concluded that implementation of the CPU would result in less than significant impacts with respect to adopted policies, plans, or programs supporting alternative transportation modes.

Project

A Traffic/Parking Generation Assessment (Rick Engineering Company, August 3, 2017) was prepared. The project is estimated to generate approximately 216 daily trips, including 16 trips during the AM peak hour and 50 trips during the PM peak hour. Based on the site-specific traffic data collected, it

is anticipated that the single project access point along Guymon Street can accommodate the site's peak hour trips. It was therefore determined that a traffic study would not be required under the Community Planning Implementation Overlay Zone – A because the project would not exceed 1,000 ADT, and the project would not be subject to additional traffic analysis and CEQA review.

Furthermore, the project is consistent with the general plan and community plan land use and zoning designations. The project would not change existing circulation patterns on area roadways. The project would not conflict with any applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system or applicable congestion management plan. The project is not expected to cause a significant short-term or long-term increase in traffic volumes, and therefore, would not adversely affect existing levels of service along area roadways. The project would not result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks in that the project would be consistent with land use plans and underlying zones, and structures would not exceed 30 feet in height. Additionally, no design features or incompatible uses that would increase potential hazards are proposed. The project would not affect emergency access to the project site or adjacent properties. Access would be provided to the project site via Guymon Street. Driveway design for the project is consistent with City design requirements to ensure safe ingress/egress from the properties. Regarding alternative transportation, the project would not alter the existing conditions of the project site or adjacent facilities. Construction of the project would not result in design measures or circulation features that would conflict with existing policies, plan, or programs supporting alternative transportation. Thus, impacts are considered less than significant, and mitigation measures are not required.

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

Air Quality

2015 Program EIR

Air Quality is discussed in Section 5.3 of the 2015 Program EIR, which identified significant and unavoidable impacts because the SESD CPU and the Encanto Neighborhoods CPU would both conflict with implementation of the Regional Air Quality Strategy (RAQS). The significant air quality impact stems from an inconsistency between the CPUs and the adopted land use plans upon which the RAQS was based, the only measure that can lessen this effect is the revision of the RAQS and State Implementation Plan (SIP), which is outside of the City's jurisdiction. As such, no mitigation is available to the City.

The 2015 Program EIR further determined that emissions due to construction of individual projects are not expected to exceed the City's project-level significance thresholds for construction or operational emissions. However, the construction of projects under the SESD CPU and Encanto Neighborhoods CPU would result in a cumulatively considerable increase in criteria air pollutant emissions. The mitigation framework would require all projects under the CPUs to implement best available control measures/technology to reduce construction emissions to below daily emission standards. However, as air emissions from future developments within the CPU areas cannot be

adequately quantified, impacts would remain significant and unavoidable at the program-level. Additionally, there would be no harmful concentrations of CO, and localized air quality emission would not exceed applicable standards. It was also determined that specific project-level design information is needed to determine stationary source emission impacts and mitigation would be required to reduce impacts to below a level of significance.

As identified in the Program EIR, emissions due to construction could potentially contribute to localized violations, and operational emissions could potentially contribute to regional violations. Mitigation measures require future projects that would exceed daily construction emissions thresholds established by the City of San Diego to incorporate best available control measures/technology to reduce construction emissions to below daily emission standards established by the City of San Diego. Development that would significantly impact air quality, either individually or cumulatively, would be approved only if it is conditioned with all reasonable mitigation to avoid, minimize, or offset the impact.

The Program EIR further identified that implementation of the CPU could result in a potentially significant impact from exposing sensitive receptors to substantial emissions of carbon dioxide or diesel particulate matter from traffic or general pollution from stationary sources.

Lastly, the Program EIR further concluded implementation of the CPU would not result in the substantial alteration of air movement as future development would be similar in height, bulk, and scale to the existing conditions in the heavily developed area.

Project

A project-specific Air Quality Technical Report was prepared by Scientific Resources Associated (April 25, 2018) to assess the potential air quality impacts associated with the project consistent with the Program EIR Mitigation Framework. The technical report evaluated existing conditions of the project vicinity, potential impacts associated with project construction and an evaluation of project operational impacts. The following is a summary of the report.

Consistency with the RAQS and SIP

The project is consistent with the General Plan, community plan, and the underlying zoning for residential development. Therefore, the project would be consistent at a sub-regional level with the underlying growth forecasts in the RAQS and would not obstruct implementation of the RAQS. As such, no impacts would result.

Short-Term (Construction) Emissions. The technical study identified that emissions of criteria pollutants during construction would be below the thresholds of significance for all construction phases for all pollutants. Project criteria pollutant emissions during construction would be temporary and are less than significant. Construction operations would include standard measures as required by City of San Diego grading permit to limit potential air quality impacts. Therefore, impacts associated with fugitive dust are considered less than significant and would not violate an air quality standard or contribute substantially to an existing or projected air quality violation. No mitigation measures are required.

Long-Term (Operational) Emissions. Long-term air emission impacts are those associated with stationary sources and mobile sources related to any change caused by a project. According to the technical study, the emissions of all criteria pollutants would be below the significance thresholds based on the estimated emissions associated with the project operations. The project is compatible with the surrounding development and is permitted by the community plan and zone designation. Based on the land use, project emissions over the long-term are not anticipated to violate any air quality standard or contribute substantially to an existing or projected air quality violation. Impacts would be less than significant, and no mitigation measures are required.

CO "Hot Spots." Projects involving traffic impacts may result in the formation of locally high concentrations of carbon monoxide (CO), known as CO "hot spots." The technical study included a screening evaluation to verify whether the project would cause or contribute to a violation of the CO standard. The project is estimated to generate approximately 216 daily trips, and the single project access point along Guymon Street would accommodate the project's peak hours according to the Traffic/Parking Generation Assessment (Rick Engineering Company, August 3, 2017). Based on the number of daily trips, the project would not cause a degradation in the Level of Service (LOS) and no CO "hot spots" would result. Impacts would be less than significant, and no mitigation measures are required.

Cumulatively Considerable Net Increase of Non-Attainment Pollutants. Construction operations could temporarily increase the emissions of dust and other pollutants. However, construction emissions would be temporary and short-term in duration; implementation of Best Management Practices (BMPs) would reduce potential impacts related to construction activities to a less than significant level. Further, the region surrounding the project is already developed. Operational emissions for development are below the significance thresholds for non-attainment pollutants. Therefore, the project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is a non-attainment under applicable federal or state ambient air quality standards. Impacts would be less than significant.

Exposure of Sensitive Receptors to Substantial Pollutant Concentrations

Carbon Monoxide. As previously discussed, the project would not result in exposure of sensitive receptors to substantial concentrations of CO, as CO "hot spots" would not result from project-related traffic. Impacts from CO would be less than significant.

Toxic Air Contaminants. If a project has the potential to result in emissions of any toxic air contaminants (TACs) which result in a cancer risk of greater than ten in one million or substantial non-cancer risk, the project would be deemed to have a potentially significant impact. The project would provide an after-school program with classrooms and recreational facilities. Construction would not generate substantial emissions of TACs. Further, the project is not an operational source of TACs and would therefore not result in emissions of TACs.

Objectionable Odors

Short-term (Construction). Odors would be generated from vehicles and/or equipment exhaust emissions during construction of the project. Odors produced during construction would be attributable to concentrations of unburned hydrocarbons from tailpipes of construction equipment

and architectural coatings. Such odors are temporary and generally occur at magnitudes that would not affect a substantial number of people. Therefore, impacts would be less than significant.

Long-term (Operational). Typical long-term operational characteristics of the project are not associated with the creation of such odors nor anticipated to generate odors affecting a substantial number of people. The project would construct a two-story commercial mixed-use building consisting of classrooms, office spaces, squash courts and a conference room. Such development, in the long-term operation, are not typically associated with the creation of such odors nor are they anticipated to generate odors affecting a substantial number or people. Therefore, project operations would result in less than significant impacts.

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

Noise

2015 Program EIR

Noise is discussed in Section 5.4 of the 2015 Program EIR that concluded the CPUs proposed increased land use density would result in increased traffic volume on numerous roadway segments within each CPU. Therefore, a resulting in a corresponding increase in ambient noise levels due to vehicle traffic that would be significant and unavoidable. Although CPU policies require new development projects to demonstrate land use compatibility, noise levels at existing structures may exceed applicable standards. Because land use incompatibilities would occur at existing residential uses in an already urbanized area, there is no feasible mitigation. Therefore, impacts would remain significant and unavoidable.

Both CPUs contain noise-related policies that aim to reduce exposure of noise sensitive receptors to noise levels which exceed applicable standards. Future discretionary projects would be reviewed for consistency with these policies. Thus, future development projects would be required to implement Mitigation Framework that requires a project-specific noise study (Mitigation Measure NOS-1 and NOS-2) to determine appropriate noise attenuation measures needed to achieve the CPUs and City noise standards. However, because the degree of future impacts and applicability, feasibility, and success of future mitigation measures cannot be adequately known for each specific future project at this program-level of analysis, the CPUs may expose noise sensitive receptors to levels exceeding applicable standards. Therefore, the noise impact remains significant and unavoidable.

As it relates to construction and stationary noise impacts, the Program EIR concluded a less than significant impact with implementation of Mitigation Framework (Mitigation Measure NOS-3 and NOS-4) that would identify, through a project-specific acoustical analysis, appropriate measures to reduce impacts to compliance levels established by the City. There is no feasible mitigation because land use incompatibilities would occur at existing homes in an already urbanized area. Therefore, impacts would remain significant and unavoidable.

Project

A site-specific Acoustical Analysis Report was prepared by Eilar Associates, Inc. (April 30, 2018) as required by the Program EIR Mitigation Framework. The technical study analyzed the existing and future noise environments. The technical report is summarized below.

The primary noise sources in the vicinity of the project site include automobile and truck traffic noise from State Route (SR) 94, Euclid Avenue, and Guymon Street, as well as noise contribution from aircraft overflight from the San Diego International Airport.

Traffic Noise. Based on counts obtained from the 2015 Caltrans traffic census, SR-94 currently carries 91,500 Average Daily Trips (ADT) in the vicinity of the project site. According to SANDAG, Euclid Avenue currently carries a traffic volume of approximately 29,300 ADT in the vicinity of the project site. Based on SANDAG TFIC Series 12 Adjusted Counts (2008), Guymon Street currently carries a traffic volume of 800 ADT in the vicinity of the project site. The project would generate approximately 216 ADT. Calculations show that the project-generated traffic noise on Euclid Avenue is expected to increase the ambient noise environment by 0.00 dB; project-generated traffic noise on Guymon Street is expected to increase the ambient noise environment by 1.0 dB. Noise levels would result in less than a 3dB increase. Therefore, the impact with regard to traffic noise is less than significant.

Construction Noise (Short-Term). Temporary noise impacts would be associated with on-site demolition, grading, use of concrete mixers, and delivery of materials. The technical report determined that construction noise impacts to surrounding properties are expected to comply with the applicable City of San Diego construction noise limits, except for the demolition phase. Due to the noise levels associated with the demolition of the existing concrete slab above the construction noise limit of 75 dBA and the proximity of construction equipment to neighboring noise sensitive receivers during this construction activity, mitigation measures in the form of a sound barrier would be implemented to reduce impacts to below a level of significance.

A Mitigation Monitoring and Reporting Program, as detailed within Section VII of the Addendum, would be implemented to reduce impacts related to noise to below a level of significance.

Stationary Noise. The technical report determined that anticipated HVAC noise levels on-site are expected to meet the applicable night-time noise limits set by the City of San Diego without the implementation of project design features. Therefore, impacts with respect to stationary noise would be less than significant.

For the long-term, typical noise levels associated with commercial mixed-used buildings are anticipated, and the project would not result in an increase in the existing ambient noise level. The project would not result in noise levels in excess of standards established in the City of San Diego General Plan or Noise Ordinance. No significant long-term impacts would occur, and no mitigation measures are required.

Aircraft Overflight Noise Sources. San Diego International Airport is located approximately 5.5 miles to the west of the project site. The project site lies just outside of the 60 – 65 dB CNEL contour. Therefore, the project would not expose people residing or working in the area to excessive noise levels. No impacts would result.

Interior Noise Impacts. The City of San Diego requires interior noise levels of 45 CNEL or less in learning spaces and 50 CNEL or less in office spaces within the building. An interior noise analysis was performed considering the proposed exterior walls, roof, windows, and doors and demonstrated that the current design is expected to be sufficient for reducing noise impacts to comply these standards with windows closed. As interior noise levels would exceed 45 CNEL or 50 CNEL with windows opened, mechanical ventilation would be required at the project site. With this project design in place, it is anticipated that the project would comply with the noise requirements of the City of San Diego Noise Element to the General Plan and the City of San Diego Encanto Neighborhoods Plan.

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

Biological Resources

2015 Program EIR

Sensitive plant and wildlife species exist in the Community Plan Area; however, the PEIR did not identify any existing sensitive species or vegetation communities on or adjacent to the project site. There is no MHPA land within the project site or adjacent to the project site. There is potential for future development of the project site to impact migratory birds and active nests as a result of brush removal, grading, and construction, which could result in displacement. The PEIR included mitigation measures focused on reducing impacts to sensitive species. Whenever future development could impact a sensitive biological resource, the PEIR requires a site-specific study to determine the degree of impact and identify appropriate mitigation measures under Mitigation Measure BIO-1. Mitigation measures for sensitive species included resource avoidance, restoration or creation of habitat, and/or dedication or acquisition of habitat.

As referenced, an arroyo bisects the project site and is identified as a potentially jurisdictional wetland/water in the PEIR. As stated, future development of the project site would include restoration of the arroyo with native plantings, which would limit potential impacts. Regardless, future development at the project site has the potential to result in impacts to habitat and drainages that are under the jurisdiction of the U.S. Army Corps of Engineers in accordance with Section 404 of the Clean Water Act (CWA), Regional Water Quality Control Board in accordance with Section 401 of the CWA, and California Department of Fish and Wildlife under Section 1600 of the Fish and Game Code. The PEIR identified mitigation measures for impacts to wetlands including a combination of habitat creation, restoration, and enhancement at specific ratios under Mitigation Measure BIO-2.

Future development of the project has the potential to impact active nests of migratory bird species; however, the canyons and water courses on and in proximity to project site are not anticipated to function as significant regional or local wildlife movement corridors for large mammals. In addition,

many of the canyon areas and water courses are included in the adopted MHPA and existing conserved land, and open space and would continue to be preserved regardless of the project.

Consistent with the PEIR, projects that have the potential to interfere with the nesting, foraging, or movement of wildlife species are required to prepare a project-specific biological resource report in accordance with City of San Diego Biology Guidelines and the MSCP Subarea Plan. Implementation of PEIR Mitigation Measure BIO-3 would reduce migratory species impacts to less than significant.

Project

The project site is vacant and located within an urbanized area. Existing site improvements consist of a playfield, basketball court and a paved parking lot. Review of aerial and street level photography shows that the project site does not contain any sensitive biological resources. The project site does not contain any sensitive riparian habitat or other identified habitat community. On-site landscaping is non-native grasses and disturbed areas. Further, the project site does not contain, nor is it adjacent to, MHPA designated lands. Therefore, it was determined that a site-specific study would not be required per Mitigation Measure BIO-1. Mitigation Measures BIO-2 and BIO-3 would not apply as there are no wetlands on site and the project would not have the potential to interfere with the nesting, foraging, or movement of wildlife species, respectively. No impacts would occur, and no mitigation measures are required.

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

Hydrology and Water Quality

2015 Program EIR

Hydrology and Water Quality are discussed in Section 5.6 of the 2015 Program EIR which determined that hydrology and water quality impacts associated with increased runoff and pollutant discharges from new development could result in potential impacts. The Program EIR identified a mitigation framework that would require future projects to be sited and designed to minimize impacts on absorption rates, drainage patterns, and surface runoff rates and floodwaters in accordance with current regulations imposed by the City, RWQCB, and FEMA. Verification of compliance with federal, state, and local storm water, drainage, and FEMA regulations would occur through the preparation of site-specific reports as outlined in mitigation measures (MM-HYD/WQ-1 and MM-HYD/WQ-2).

The Program EIR concluded that impacts related to regional water quality, including groundwater, as less than significant. The RWQCB administers the NPDES Regional MS4 Permit that would require compliance with Federal, state and local storm water regulations that provide protection to both surface and groundwater beneficial uses of downstream receiving waters.

Lastly, impacts associated with exposing people or structures to risk of loss, injury, or death involving flooding, were concluded to be less than significant as future projects within the CPU's would be required to comply with the City's floodplain regulations.

Project

Drainage. A site-specific Drainage Study was prepared by Rick Engineering (August 23, 2017) that evaluated the existing and proposed drainage patterns. Based on the findings of the technical report, drainage characteristics would change slightly from pre-project conditions resulting in an increase in runoff flows due to the addition of impervious areas. The increase would be approximately 1.4 cfs when only onsite tributary area is considered or 0.8 cfs when off-site tributary area is accounted for. However, the actual increase would be less due to incidental flow attenuation that each of the proposed biofiltration basins would provide. Therefore, the minor increase is not anticipated to result in any significant adverse impacts for downstream drainage facilities. While there is an increase in the 100-year runoff between the pre- and post-, the adjacent intersection is subject to inundation in a 100-year event from the nearby South Las Chollas Creek. Detaining post-project runoff to the pre-project runoff condition would not alleviate the downstream drainage facilities from inundation. Due to this, a Hydraulic Analysis and No-Rise Certification was prepared by Rick Engineering (September 12, 2018) showing no negative impacts or increase in water surface elevations for the project site and its adjacent properties.

Further, the project proposes construction activities within the Federal Emergency Management Agency (FEMA) defined floodplain for South Las Chollas Creek, between FEMA cross sections Y and Z, as shown on the FEMA Flood Insurance Rate Map (FIRM) map number 06073C1094G, effective May 16, 2012 according to the Hydraulic Analysis and No-Rise Certification. FEMA has designated this portion of South Las Cholla Creek as Zone AE and Zone X. As such, floodplain management would be required to comply with the City Floodplain Management Requirements and FEMA Regulations. Portions of the site would be raised several feet above the base flood elevation. A Conditional Letter of Map Revision based on Fill (CLOMR-F) has been submitted to FEMA and a FEMA letter was received dated January 18, 2018, which determined that the project meets the minimum flood plain management criteria of the National Flood Insurance Program (NFIP). The project would be designed per City requirements to avoid impedance or redirection of flood flows to the maximum extent practicable. Additionally, the project results in no increase to the base floor elevations (100-year flood), floodway elevations, or floodway widths of South Las Chollas Creek at cross sections published in the Flood Insurance Study or unpublished cross-sections in the vicinity of the proposed development. The water surface elevation in this portion of South Las Chollas Creek appears to be driven primarily by backwater from the undersized culvert under Euclid Avenue. The proposed grading is on the fringe of the floodplain and in combination with the proposed walls adjacent to the structure providing cut to balance out conveyance pre- and post-project as well as with Manning's n-values being reduced with more concrete sidewalks and walls in the proposed condition, no increase in water surface elevations is calculated.

Water Quality. According to the City's Storm Water Requirements Applicability Checklist, the project is considered to be a Priority Development Project. Therefore, a Storm Water Quality Management Plan (SWQMP) was prepared by Rick Engineering (August 23, 2017) to identify and implement required structural best management practices (BMP) for storm water pollutant control (BMP Design Manual Chapter 5, Part 1 of Storm Water Standards), as well as low impact development source control BMPs. These requirements have been reviewed by qualified City staff and would be re-verified during the ministerial process. Adherence to applicable water quality

standards would ensure adverse impacts associated with compliance with quality standards are avoided. Impacts would be a less than significant.

Further although grading would be required for the project, the project would implement BMPs to ensure that substantial erosion or siltation on or off-site would not occur. Thus, the project would not significantly alter the overall drainage pattern for the site or area, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site. Impacts would be less than significant, and no mitigation measures are required.

The project would be required to comply with all City storm water standards during and after construction. Appropriate BMPs would be implemented to ensure that water quality is not degraded; therefore, ensuring that project runoff is directed to appropriate drainage systems. Any runoff from the site is not anticipated to exceed the capacity of existing storm water systems or provide substantial additional sources of polluted runoff. Impacts would be less than significant, and no mitigation measures are required.

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

Historical Resources (Archaeological and Cultural)

2015 Program EIR

The Program EIR concluded that future development and related construction activities in accordance with the CPU could result in the alteration of a pre-historic or historic resource (building, structure, object, or site); impact existing religious or sacred uses; or disturb human remains, as discussed in Section 5.7, Historical Resources. Impacts would be reduced to below a level of significance with adherence to existing regulations and guidelines, and implementation of the mitigation framework in the 2015 Program EIR.

Project

Archaeology. As identified in the CPU, the project area is located within an area identified as sensitive on the City's Historical Resources Sensitivity Maps and therefore subject to the Historical Resources Regulations of the Land Development Code. The purpose and intent of the Historical Resources Regulations of the Land Development Code (Chapter 14, Division 3, and Article 2) is to protect, preserve and, where damaged, restore the historical resources of San Diego. The regulations apply to all proposed development within the City of San Diego when historical resources are present on the premises. CEQA requires that prior to approving discretionary projects, the Lead Agency must identify and examine the significant adverse environmental effects, which may result from that project. A project that may cause a substantial adverse change in the significance of a historical resource may have a significant effect on the environment (Sections 15064.5(b) and 21084.1). A substantial adverse change is defined as demolition, destruction, relocation, or alteration activities, which would impair historical significance (Sections 15064.5(b)(1)). Any historical resource listed in, or eligible to be listed in the California Register of Historical

Resources, including archaeological resources, is considered to be historically or culturally significant.

As part of the CPU effort the entire Encanto planning area was identified as having a moderate to high prehistoric resource potential. Although the project site is mapped as having a moderate potential, fill extends to depths varying approximately three and a half feet to eleven feet below grade based on the site-specific Geotechnical Investigation prepared by SCST, Inc. (August 2017). Therefore, in accordance with Mitigation Framework measure HIST-1, staff made the determination that there is no potential to impact any unique or non-unique historical resources, and no site-specific archaeological survey and report was required.

Built Environment. The City of San Diego reviews projects requiring the demolition of structures 45 years or older for historic significance in compliance with the California Environmental Quality Act (CEQA). CEQA Section 21084.1 states that "A project that may cause a substantial adverse change in the significance of an historical resource is a project that may cause a significant effect on the environment." Historic property (built environment) surveys are required for properties which are 45 years of age or older and which have integrity of setting, location, design, materials, workmanship, feeling, and association.

The project site is currently vacant and does not contain any structures. Therefore, Mitigation Framework HIST-2 requiring an evaluation of historic architectural resources would not apply. No impacts would result.

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

Paleontological Resources

2015 Program EIR

Paleontological Resources, as discussed in Section 5.8 of the 2015 the Program EIR, determined that future development that would involve grading or excavation of over 1,000 cubic yards in high sensitivity or 2,000 cubic yards in moderate sensitivity formations, with depth of cut at or greater than ten feet, would result in the loss of significant fossil remains and a significant impact to paleontological resources. Additionally, grading that would occur in shallow areas where formational soils are exposed at the surface and where fossil localities have already been identified would also result in the loss of paleontological resources. The Program EIR includes a Mitigation Framework that requires monitoring for paleontological resources during grading activities. Impacts would be reduced to below a level of significance with implementation of the mitigation framework in the 2015 Program EIR.

Project

According to the site-specific Geotechnical Investigation prepared by SCST, Inc. (August 2017), the project site is underlain by Fill, Old Alluvial Flood-Plain Deposits, and San Diego Formation. Fill and Old Alluvial Flood-Plain Deposits are not sensitive for paleontological resources. San Diego

Formation has a high sensitivity rating for paleontological resources and was encountered at depths starting at eight feet in borings conducted during the geotechnical investigation.

The project would require approximately 600 cubic yards of balanced grading with a maximum cut depth of three feet. The project's grading would not exceed the threshold described in the 2015 Program EIR. Therefore, Mitigation Framework, MM-PALEO-1 would not apply to the project. No impacts would result.

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

Geology and Seismic Hazards

2015 Program EIR

The Program EIR, Section 5.9, identified potentially significant impacts related to geologic and seismic hazards. Potential impacts include the exposure of people or structures to geologic hazards such as earthquakes, landslides, mudslides, ground failure or similar hazards and an increase in wind or water erosion of soils. The Program EIR identified a mitigation framework through the preparation of a site-specific report, as well as incorporation of engineering design standards in addition to adherence to the City's Municipal Code and the California Building Code.

As discussed in the Program EIR, future project construction and grading activities could expose topsoil and increase soil erosion from water and wind. However as identified in the Mitigation Framework (MM-GEO-2), future projects would be required to adhere to the City's Municipal Code that would ensure no adverse impacts from erosion or loss of topsoil. Impacts would be less than significant.

Lastly, the Program EIR concluded that future development would result in impacts related to unstable geologic units or soils and would therefore be required to implement the mitigation framework in combination with the policies outlined in the CPU. Impacts would be less than significant.

Project

A site-specific Geotechnical Investigation (August 2017) and Update Letter and Responses to City Review Comments (December 20, 2017) were prepared for the project by SCST, Inc. as required by the 2015 Program EIR. Based on the results of the investigation, it was determined that the planned construction would be feasible from a geotechnical standpoint. The main geotechnical consideration affecting the project would be the presence of potentially compressible fill. Remedial grading would need to be performed to reduce the potential for distress to the planned building and improvements. The proposed building can be supported on shallow spread footings with bottoms levels on compacted fill. Additionally, the project would be required to comply with the California Building Code that would reduce impacts to people or structures to an acceptable level of risk. Implementation of proper engineering design and utilization of standard construction practices, to

be verified at the building permit stage, would ensure that the potential for impacts from regional geologic hazards would remain less than significant.

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

Health and Safety/Hazardous Materials

2015 Program EIR

Hazardous Materials are discussed in Section 5.10 of the 2015 the Program EIR that concluded implementation of the CPU would result in less than significant impacts regarding hazards to people or the environment (hazardous materials, airport hazards, and wildlands). Future projects would be required to comply with federal, state, and local regulation, as well as policies in the CPUs to ensure that impacts related to exposing people to potential health hazards or development on sites included on a hazardous materials list would be less than significant.

The Program EIR concluded that implementation of the CPU would result in less than significant impacts related to interference with an adopted emergency response or evacuation plan. Further, the PEIR concluded that implementation of the CPU would result in less than significant impacts related to exposure of people or structures to risks associated with wildfires as future development would be required to comply with City and fire regulations, as well as various CPU policies.

Impacts related to hazardous emissions within a quarter-mile of an existing or proposed school were concluded to be less than significant because future development would be required to comply with federal, state and local regulations, as well as various CPU policies.

The Program EIR concluded that implementation of the CPU would result in less than significant impacts related to safety hazards for people residing or working in a designated airport influence area. Future development would be required to comply with applicable land use compatibility policies with respect to airspace.

Project

Construction of the project may require the use of hazardous materials (fuels, lubricants, solvents, etc.), which would require proper storage, handling, use and disposal. Although minimal amounts of such substances may be present during construction of the project, they are not anticipated to create a significant public hazard. Once constructed, due to the nature of the project, the routine transport, use, or disposal of hazardous materials on or through the subject site is not anticipated. Therefore, impacts would be less than significant.

A search of potential hazardous materials sites compiled pursuant to Government Code Section 65962.5 was completed for the project site. Several databases and resources were consulted including the Department of Toxic Substances Control (DTSC) EnviroStor database, the California State Water Resources Control Board GeoTracker database, and other sources of potential hazardous materials sites available on the California EPA website. Based on the searches conducted, no contaminated sites are on or adjacent to the project site. Furthermore, the project

site was not identified on the DTSC Cortese List. Therefore, the project would not create a significant hazard to the public or the environment. No impacts would result.

The project would not impair the implementation of, or physically interfere with, an adopted emergency response plan or evacuation plan. No roadway improvements are proposed that would interfere with circulation or access, and all construction would take place on-site. No impacts would occur, and no mitigation measures are required.

Although the project site is located within the Airport Influence Area (San Diego International Airport) Review Area 2 as depicted in the adopted 2014 Airport Land Use Compatibility Plan (ALUCP), the project would not result in a safety hazard residing in the project area. Only airspace protection and overflight policies and standards apply within Review Area 2. Therefore, no impacts would result.

The project is located within an urbanized area. There are no wildlands or other areas prone to wildfire within the vicinity of the project site. Therefore, the project would not expose people or structures to wildland fires. No impacts would occur, and no mitigation measures are required.

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

Greenhouse Gas Emissions

2015 Program EIR

Greenhouse Gas Emission are discussed in Section 5.11 of the 2015 Program EIR, which concluded impacts resulting from buildout of the CPUs would be less than significant. The SESD and Encanto Neighborhoods CPUs would achieve an approximate 42 and 40 percent reduction in GHG emissions relative to Business as Usual (BAU), respectively, which would exceed the 28.3 percent required for consistency with the CARB Scoping Plan. Additionally, the CPUs include land use, sustainability, and mobility policies that are intended to reduce vehicle miles traveled and increase transit as well as other modes of transportation. Further, the Program EIR concluded that the CPUs would not conflict with a plan, policy, or regulation adopted for the purpose of reducing the GHG emissions. Therefore, a mitigation framework was not required.

Project

In the time following the certification of the CPUs Program EIR, the City adopted a Climate Action Plan (CAP) in December 2015 that outlines the actions the City will undertake to achieve its proportional share of State GHG emission reductions. The City has identified the following five 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. In order to ensure that future developments comply with the CAP, the City adopted a CAP Consistency Checklist on 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 to ensure that the City will achieve the emission reduction targets identified in its CAP.

The CPUs Program EIR Identified various policies and recommendations aimed to reduce GHG emissions of which support the City's reduction goals. Therefore, in keeping with the policies in the CPUs, the project would be required to comply with the CAP Consistency Checklist.

CAP Consistency Checklist. The CAP Consistency Checklist includes a three-step process to determine project if the 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 design features compliance with the CAP strategies. Step 3 is only applicable if a project is not consistent with the land use and/or zone, but is also in a transit priority area to allow for more intensive development than assumed in the CAP.

Under Step 1 of the CAP Consistency Checklist, the project is consistent with the existing General Plan and Community Plan land use designations and zoning for the site. Therefore, the project is consistent with the growth projections and land use assumptions used in the CAP. Furthermore, completion of Step 2 of the CAP Consistency Checklist demonstrates that the project would be consistent with applicable strategies and actions 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 strategy. Additionally, the project incorporates a roof-mounted photovoltaic system consisting of solar panels sufficient to generate at least 30 percent of the project's projected energy consumption. These project features would be assured as a condition of project approval. Thus, the project is consistent with the CAP. Step 3 of the CAP Consistency Checklist would not be applicable, as the project is not proposing a land use amendment or a rezone. Based on the project's consistency with the City's CAP Checklist, the project's contribution of GHGs to cumulative statewide emissions would be less than cumulatively considerable. Therefore, the project's direct and cumulative GHG emissions would have a less than significant impact on the environment.

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

Energy Conservation

2015 Program EIR

Energy is discussed in Section 5.12 of the 2015 Program EIR, which determined that implementation of the CPUs has the potential to result in impacts on energy supply due to the development that is anticipated to occur in response to projected population growth that is being planned for the CPUs. The Program EIR concluded that implementation of the CPU would result in less than significant impacts related to electrical power. The increased demand for electric power in the Community Plan Area, including development of the project site, was determined to not require new electrical systems or a substantial alteration of existing utilities, which would create physical impacts. Implementation of the CPU was determined not to have an adverse effect on the use of fuel.

Energy used during future construction of the planned land uses was not considered excessive given the anticipated reduction in construction equipment emissions and the short-term nature of the energy consumption needed for construction. The PEIR also concluded that development in accordance with the CPU would not result in the use of excessive amounts of fuel during the operation of future development projects under the CPU due to the incorporation of goals to promote alternatives to the automobile and compliance with energy conservation measures required by energy policies.

Energy resources would be consumed during construction and operation of future development in conformance with the CPUs. Many of the policies in the CPUs aim to reduce energy consumption and promote sustainable practices; therefore, the potential impact is less than significant.

Project

Development of the project would not result in any new or more severe impacts related to electrical power or fuel consumption. The project would be required to meet the mandatory energy standards of the current California energy code as well as the Community Plan Urban Design Element, which contains a list of climate change and sustainable development policies that focus on designing new development to have a climate, energy efficient, and environmentally oriented site design.

Additionally, construction of the project would consume energy through the operation of heavy off-road equipment, trucks, and worker traffic. However, construction equipment used for future development is anticipated to be more efficient as engines are replaced, exhaust systems are retrofitted, and older equipment is removed from service and new equipment meeting more stringent emission standards.

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

Public Services and Facilities

2015 Program EIR

Public Services and Facilities are discussed in Section 5.13 of the 2015 Program EIR, which determined that a mitigation framework was not necessary because projects developed in accordance with the CPUs would be required to pay development impact fees, as well as other funding sources.

The Program EIR, Section 5.13, concluded that implementation of the Community Plan would increase the demand for public services and facilities as a result of population growth. The CPU estimated that improvements associated with plan implementation could generate an increase in residents within the Encanto Community. Police and fire protection would be required to meet standards identified in the General Plan and further supported by policies in the CPUs. Additionally, future development projects would be required to pay development impact fees accordingly, that

would contribute towards maintenance and construction of facilities and services. The 2015 Program EIR determined that a mitigation framework was not necessary, as impacts were determined to be less than significant.

Project

The project would be consistent with the General Plan, Community Plan and zoning. The project site is located within an urbanized and developed area. Fire protection and police protection services are already provided. The project would not adversely affect existing levels of such services to the area and would not require the construction of new or expansion of existing governmental facilities. No impacts would occur, and no mitigation measures are required.

Further, the project would not significantly increase the demand on public schools over that which currently exists and is not anticipated to result in a significant increase in demand for public educational services, nor would the project significantly increase the demand on existing neighborhood or regional parks or other recreational facilities over that which presently exists because the project would provide an after-school youth program. As such, no impacts related to school services occur, and no mitigation measures are required.

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

Public Utilities

2015 Program EIR

Public Utilities are discussed in Section 5.14 of the 2015 Program EIR that identified future development implemented in accordance with the CPUs would result in an increase in residential and non-residential uses within the plan areas. With new development an increased demand for public utilities that could require updating or replacing of existing infrastructure, or installing new infrastructure, on a project-by-project basis could result.

With regard to water, sewer, and solid waste systems, the Program EIR identified that the City and associated service providers have been undertaking ongoing improvements to accommodate long-term needs, including those related to population growth. Future improvements to public utilities to accommodate the CPUs at buildout would not be out of character with existing development or existing improvement plans. For resource-based utilities, the CPUs contain policies that emphasize conservation and increasing efficiency in order to minimize the overall demand for those resources as well as policies to minimize environmental impacts.

For all utilities, adherence to existing policies and regulation, combined with implementation of proposed CPUs policies, would ensure that no new systems or substantial alterations causing significant environmental impacts would take place. Additionally, implementation of the CPUs would not result in excessive demand for water. All impacts regarding public utilities were anticipated to be less than significant.

Project

Implementation of the project would not interrupt existing sewer service to the project site or other surrounding development. The project is not anticipated to generate a significant amount of wastewater. Wastewater facilities used by the project would be operated in accordance with the applicable wastewater treatment requirements of the Regional Water Quality Control Board (RWQCB). Existing sewer infrastructure exists within roadways surrounding the project site and adequate services are available to serve the project. Adequate services are available to serve the site and the project would not require the construction or expansion of existing facilities.

The project would not exceed the capacity of the existing storm water system and require the construction of new or expanded treatment facilities of which would cause significant environmental effects. The project was reviewed by qualified City staff who determined that the existing facilities are adequately sized to accommodate the proposed development.

The project would construct a commercial mixed-use building consisting of classrooms, office spaces, squash courts and a conference room, which does not necessitate the preparation of a water supply assessment. The site currently receives water service from the City, and adequate services are available to serve the project without requiring new or expanded entitlements. The project would construct approximately 21,630-square-feet of building space and would not exceed the thresholds requiring the preparation of a waste management plan. The project would be served by a landfill with sufficient permitted capacity to accommodate the project's disposal needs. Construction debris and waste would be generated from the demolition of hardscape, including concrete slab, asphalt pavement and a retaining wall, and construction of the two-story commercial mixed-use building. All construction waste from the project site would be transported to an appropriate facility, which would have adequate capacity to accept the limited amount of waste that would be generated by the project. Long-term operation of the project is anticipated to generate typical amounts of solid waste associated with such use. Furthermore, the project would be required to comply with the City's Municipal Code (including the Refuse and Recyclable Materials Storage Regulations (Municipal Code Chapter 14, Article 2, Division 8), Recycling Ordinance (Municipal Code Chapter 6, Article 6, Division 7), and the Construction and Demolition (C&D) Debris Deposit Ordinance (Municipal Code Chapter 6, Article 6, Division 6)) for diversion of both construction waste during the demolition phase and solid waste during the long-term, operational phase.

Natural gas is imported into southern California from sources in Canada to Texas. SDG&E currently purchases nearly 80 percent of its electricity and natural gas from source outside the San Diego region. Energy demand is discussed in Section 5.12 of the 2015 Program EIR, which determined that implementation of the CPUs has the potential to result in impacts on energy supply due to the development that is anticipated to occur in response to projected population growth planned for the CPUs. The proposed project is consistent with what was envisioned for the site; thus, energy demand is assumed to be less as demand is driven by the number of users. Energy resources would be consumed during construction and operation of future development in conformance with applicable regulations and CPU policies intended to minimize energy demand.

Communications systems for telephone, internet service, and cable television are serviced by utility providers such as AT&T, IBM, Cox, and other independent cable companies. All communication infrastructure associated with the proposed project would be located underground per San Diego Municipal Code Section 144.0240.

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

Visual Effects and Neighborhood Character

2015 Program EIR

Visual Effects and Neighborhood Character is discussed in Section 5.15 of the 2015 Program EIR, which determined that future development under the CPUs could result in adverse impacts on the areas' visual quality and community character. Potential impacts include alteration of the communities' visual character by introducing development that is incompatible with the scale and design of surrounding development and landform; the alteration of the existing landform through grading, other construction activities, and erosion; and the introduction of substantial glare from new development that would adversely affect daytime or nighttime views. The Program EIR concluded that implementation of the CPUs would not result in significant impacts to the existing or planned character of the areas. Much of the CPU areas are already developed and future development was expected to take place on infill sites. New development projects are anticipated to be developed in accordance with the City's General Plan, Land Development Code, as well as CPUs policies. Compliance with these existing policies and regulations would prevent development in excess of height and bulk regulations and ensure that any new development would be compatible with historic preservation standards, landform features such as hillsides, and any sensitive resources that may contribute to visual character.

All future development at the project site is required to comply with the City of San Diego Municipal Code, which includes regulations intended to reduce light pollution. The Community Plan Area is largely developed and any new development resulting from the Community Plan would take place in or near developed and urbanized areas where moderate light and glare already exists. Lighting from future development in compliance with the Municipal Code and the policies in the Community Plan would not be out of character with the urban environment.

Overall, adherence to existing policies and regulation, and implementation of the CPUs policies would ensure that potential impacts would be below a level of significance.

Project

Development of the project site would be considered infill development as the project site is currently vacant and surrounded by existing residential and commercial land uses. The scope of development would be consistent with what was analyzed in the PEIR. Implementation of the CPU was determined to not create light or glare which would adversely affect daytime and nighttime views in the area. The area surrounding the site is largely developed and all lighting incorporated

into the project would be designed consistent with applicable codes to avoid spillover and off-site impacts.

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

VI. ISSUES NOT ANALYZED IN THE PREVIOUS EIR

California Environmental Quality Act (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 Environmental Impact Report (EIR) provided a similar level of analysis, even for those issue areas considered to result in impacts found not to be significant.

Revisions to the project components evaluated under the EIR 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. MITIGATION, MONITORING, AND REPORTING PROGRAM (MMRP) INCORPORATED INTO THE PROJECT

The project shall be required to comply with applicable mitigation measures outlined within the Mitigation Monitoring and Reporting Program (MMRP) of the previously certified Program EIR (No. 386029 / SCH No. 2014051075) and those identified with the project-specific subsequent technical studies. The following MMRP identifies measures that specifically apply to this project.

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

1. Prior to the issuance of any construction permits, such as Demolition, Grading or Building, or beginning any construction-related activity on-site, the Development Services Department (DSD) 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/information/standtemp>
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. **PRE-CONSTRUCTION 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 consultant:

Qualified Acoustician

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, applicant is also required to call **RE and MMC at 858-627-3360**
2. **MMRP COMPLIANCE:** This Project, Project Tracking System (PTS) Number 600700 and/or Environmental Document Number 600700, 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.
 3. **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.

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 would be performed. When necessary for clarification, a detailed methodology of how the work would 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
Noise	Acoustical Reports	Noise Mitigation Features Inspection
Bond Release	Request for Bond Release Letter	Final MMRP Inspections Prior to Bond Release Letter

C. SPECIFIC MMRP ISSUE AREA CONDITIONS/REQUIREMENTS

NOISE

- I. **Construction Noise Mitigation:** Prior to issuance of any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits or a Notice to Proceed for Subdivisions, but prior to the first preconstruction meeting, whichever is applicable, the Owner/Permittee shall ensure the following to the satisfaction of the City of San Diego Development Service Department as discussed in the Acoustical Analysis Report (Eilar Associates, Inc., April 30, 2018):

- A. Install a temporary noise barrier during the demolition phase. The noise barrier shall be ten feet high along the northern property line and shall be six feet high along the western property line of the subject property. The noise barrier shall be solid and constructed of masonry, wood, plastic, fiberglass, steel, or a combination of those materials, with no cracks or gaps, through or below the wall. Any seams or cracks must be filled or caulked.

If wood is used, it shall be tongue and groove, and must be at least 7/8-inch thick or have a surface density of at least 3 ½ pounds per square foot. Any door or gate(s) must be designed with overlapping closures on the bottom and sides and meet the minimum specifications of the wall materials described above. The gate(s) shall be of ¾-inch thick or greater wood, solid-sheet metal of at least 18-gauge metal, or an exterior-grade solid-core steel door with prefabricated door jambs.

An alternative option to the above criteria would be to install noise attenuation blankets, with a minimum Sound Transmission Class (STC) rating of 28 and overlapping seams.

VIII. SIGNIFICANT UNMITIGATED IMPACTS

The SESD and Encanto Neighborhoods Community Plan Updates Program EIR No. 386029/SCH No. 20144051075 indicated that significant impacts to the following issues would be substantially lessened or avoided if all the proposed mitigation measures recommended in the EIR were implemented: Land Use; Transportation; Air Quality; Noise; Biological Resources; Hydrology and Water Quality Historical Resources; Paleontological Resources; and Geology and Seismic Hazards, Hazardous Materials, Greenhouse Gas Emissions, Energy, Public Services and Facilities, Public Utilities, and Visual Effects and Neighborhood Character. The PEIR further concluded that significant impacts related to Transportation, Air Quality, and Noise would not be fully mitigated to below a level of significance. With respect to cumulative impacts, implementation of the EIR would result in significant Transportation, Air Quality, and Noise impacts, which would remain significant and unmitigated. Because 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 final Program EIR, 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 Program EIR, new CEQA Findings and or Statement of Overriding Considerations are not required.

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

IX. CERTIFICATION

Copies of the addendum, the Program EIR, the Mitigation Monitoring and Reporting Program, and associated project-specific technical appendices, if any, may be reviewed by appointment in the office of the Development Services Department, or purchased for the cost of reproduction.



Elizabeth Shearer-Nguyen, Senior Planner
Development Services Department

November 30, 2018

Date of Final Report

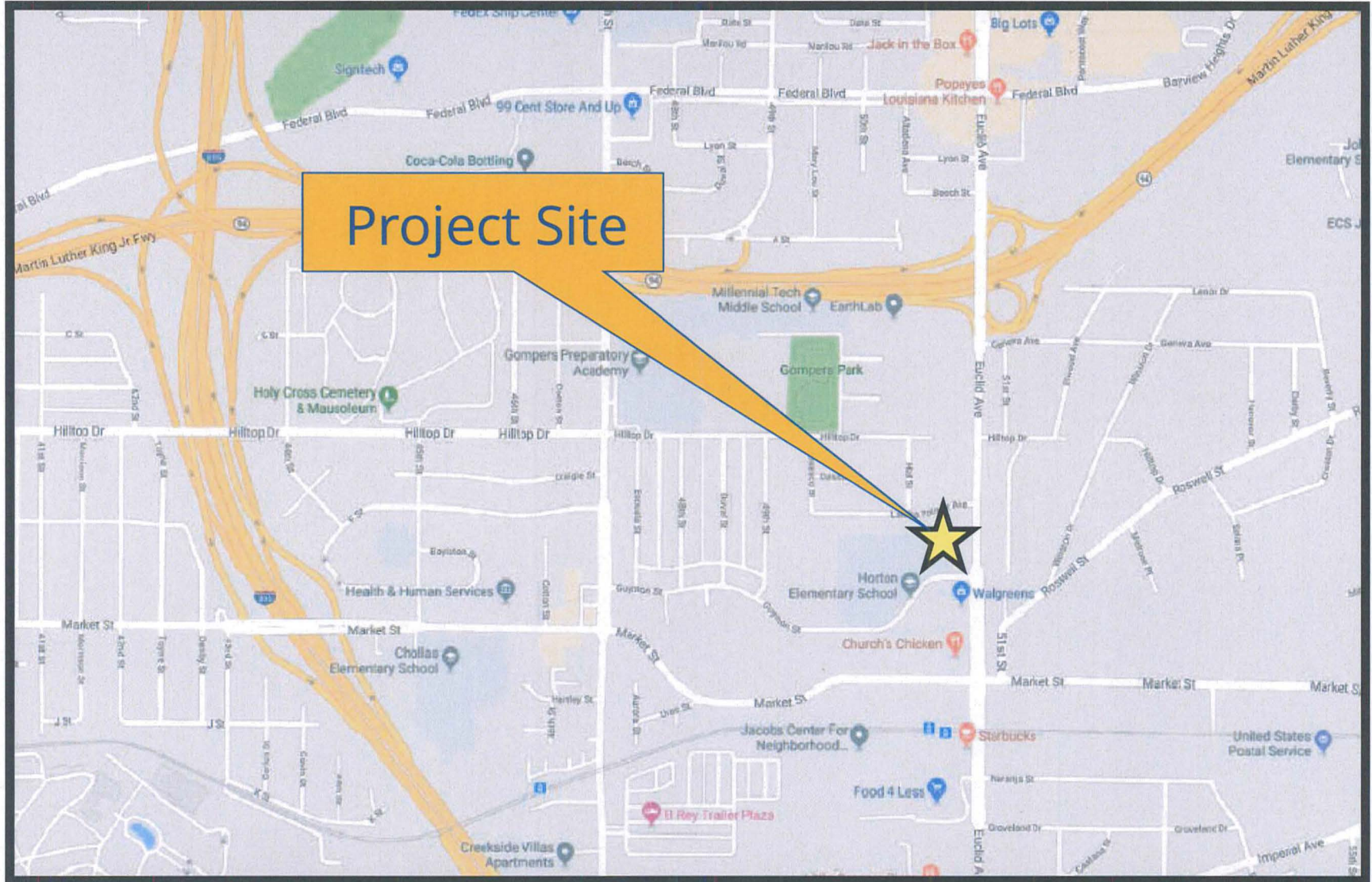
Analyst: E. SHEARER-NGUYEN

Attachments:

Figure 1: Project Location Map

Figure 2: Aerial Photograph

Figure 3: Site Plan



Location Map

Access Youth Academy - Project 600700
704 Euclid Avenue



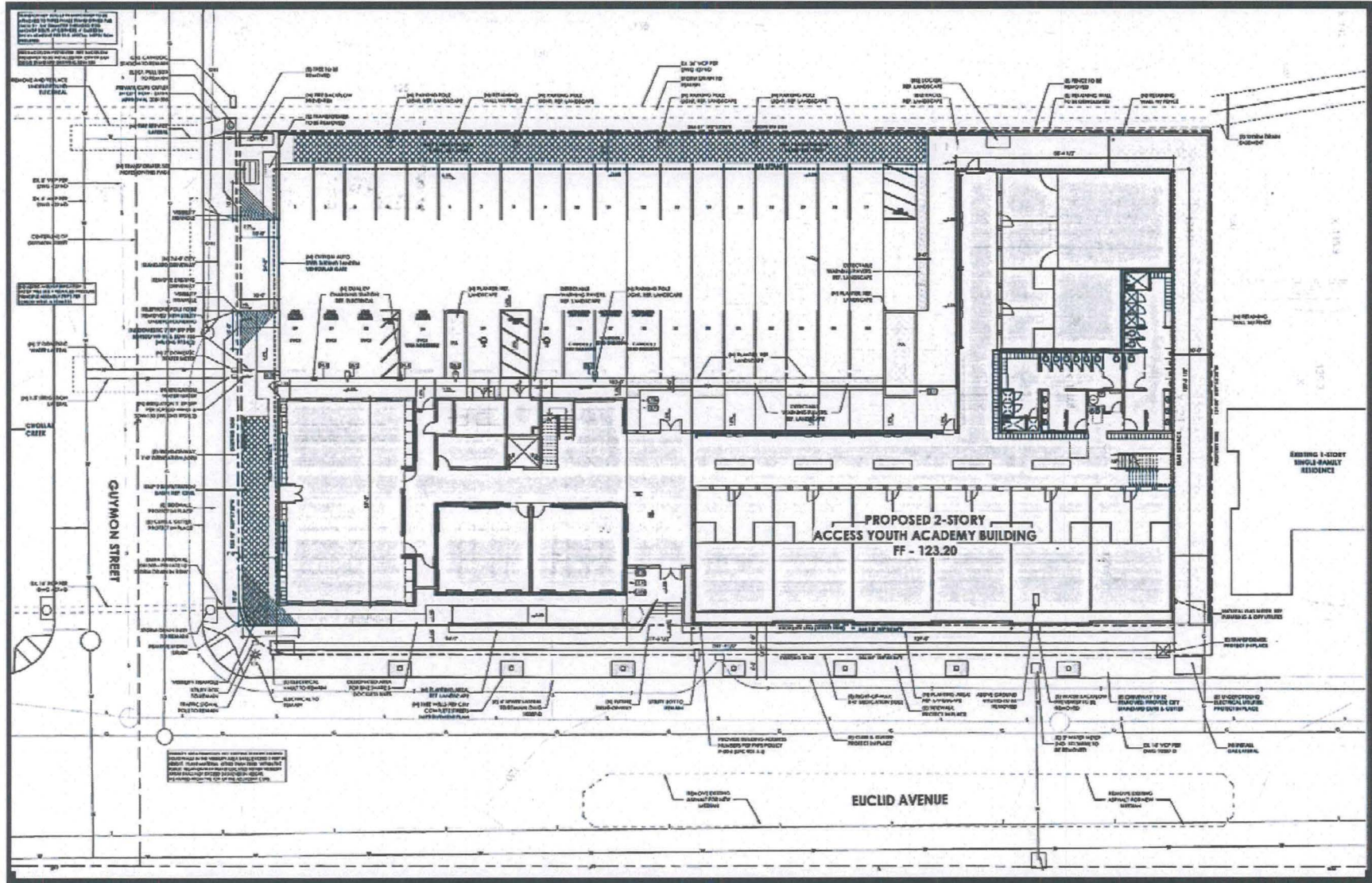
FIGURE 1



Aerial Photograph
Access Youth Academy -Project 600700
704 Euclid Avenue



FIGURE 2



Site Plan

Access Youth Academy - Project 600700
704 Euclid Avenue



FIGURE 3