



THE CITY OF SAN DIEGO

## MITIGATED NEGATIVE DECLARATION

Project No. 637438  
SCH No. If Applicable

**SUBJECT:** **32<sup>nd</sup> & Broadway:** The subject project proposes a Right of Way Vacation, Tentative Map, Site Development Permit, and Neighborhood Development Permit for the construction of a 38-unit residential development consisting of 34 market rate residential condominium units and four moderate income units in six, three-story buildings, with parking for 628 vehicles, and to vacate a portion of the public right-of-way of Broadway between 32nd and 33rd streets. The 1.211-acre unimproved site is located east of 32nd Street, north of State Route 94, in the RM-1-1 zone (Residential-Multiple Unit), the San Diego International Airport (SDIA) Noise Contours Overlay Zone (65-70 CNEL), the Airport Influence Area (SDIA - Review Area 1), the Federal Aviation Administration (FAA) Part 77 Noticing Area (SDIA threshold at 175 feet AMSL), within the Greater Golden Hill Community Plan area and Council District 3. The Community Plan land use map (Figure 2-1) designates the subject site as Residential - Low Medium density. The Project includes a density bonus pursuant to California Government Code Section 65915 (State Density Bonus Law). LEGAL DESCRIPTION: Lots 25 through 36, block 124 of Choate's Addition, Map 167, and fractional lot 25, block 124 of E.W. Morse's subdivision, Map 547, and a 65-foot-wide portion of the north half of Broadway as dedicated per Map 167. APPLICANT: 32nd & Broadway, LLC.

**Update February 11, 2021**

**Minor revisions have been made to the draft Mitigated Negative Declaration (MND). Revisions to the language would appear in ~~strikeout~~ and underline format. The update to the language in the MMRP would not result in any changes to the environmental impacts associated with the project. As such, no recirculation of the MND is required. In accordance with the California Environmental Quality Act, Section 15073.5 (c)(4), the addition of new information that clarifies, amplifies, or makes insignificant modification does not require recirculation as there are no new impacts and no new mitigation identified. An environmental document need only be recirculated where there is identification of new significant environmental impact or the addition of a new mitigation measure required to avoid a significant environmental impact.**

I. PROJECT DESCRIPTION:

See attached Initial Study.



II. ENVIRONMENTAL SETTING:

See attached Initial Study.

III. DETERMINATION:

The City of San Diego conducted an Initial Study (IS) which determined that the proposed project could have a significant environmental effect in the following areas(s): Biology. Subsequent revisions in the project proposal create the specific mitigation identified in Section V of this Mitigated Negative Declaration (MND). The project as revised now avoids or mitigates the potentially significant environmental effects previously identified, and the preparation of an Environmental Impact Report will not be required.

IV. DOCUMENTATION:

The attached Initial Study documents the reasons to support the above Determination.

V. MITIGATION, MONITORING AND REPORTING PROGRAM:

**BIO-MM1 Mitigation Fee:** A total of 0.23-acre of Diegan coastal sage scrub located outside of the MHPA will be directly impacted as a result of project implementation. A mitigation ratio of 1:1 for impacts to Tier II (uncommon uplands, coastal sage scrub, coastal sage scrub/chaparral) will be required. Prior to construction, the project applicant will provide monetary compensation to the City of San Diego Habitat Acquisition Fund (HAF) as established by the City Council. Therefore, the total resulting mitigation required for direct project impacts is a total of a 0.23-acre equivalent contribution to the HAF plus a ten percent (10%) administrative fee.

VI. PUBLIC REVIEW DISTRIBUTION:

Draft copies or notice of this Mitigated Negative Declaration were distributed to:

Federal Government

U.S. Fish & Wildlife Service

State of California

State Clearinghouse

California Dept. of Fish & Wildlife

City of San Diego

Public Notice Journal

Councilmember Whitburn, District 3

City Attorney's Office

Development Services Department

Firouzeh Tirandazi, Project Management

Karen Vera, Engineering

Jamie Kennedy, EAS  
Sam Johnson, MMC  
Daniel Neri, Landscaping  
Matthew Kessler, Planning Review  
Meghan Cedeno, Transportation  
Irina Itkin, Water & Sewer Review  
Planning Department  
Bernard Turgeon, Long-Range Planning

Greater Golden Hill

Kathy Vandenheuvel, Chair, Greater Golden Hill Community Planning Group  
Friends of Switzer Canyon

Other Interested Parties

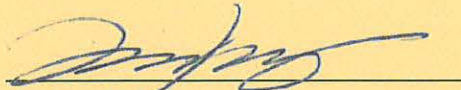
Sierra Club  
San Diego Audubon Society  
Mr. Jim Peugh  
California Native Plant Society  
Endangered Habitats League  
Joseph M. Galascione  
George Mazis, Atlas Management

VII. RESULTS OF PUBLIC REVIEW:

- ( ) No comments were received during the public input period.
- ( ) Comments were received but did not address the accuracy or completeness of the draft environmental document. No response is necessary and the letters are incorporated herein.
- (✓) Comments addressing the accuracy or completeness of the draft environmental document were received during the public input period. The letters and responses are incorporated herein.

Copies of the draft Mitigated Negative Declaration, the Mitigation, Monitoring and Reporting Program and any Initial Study material are available in the office of the Development Services Department for review, or for purchase at the cost of reproduction.





Jamie Kennedy  
Senior Planner  
Development Services Department

December 17, 2020

Date of Draft Report

February 11, 2021

Date of Final Report

Analyst: Jamie Kennedy

Attachments: Attachment 1: Regional Location Map  
Attachment 2: Project Site Map

**Comment Letter 1**



**San Diego County Archaeological Society, Inc.**

Environmental Review Committee

28 December 2020

To: Ms. Jamie Kennedy  
Development Services Department  
City of San Diego  
1222 First Avenue, Mail Station 501  
San Diego, California 92101

Subject: Draft Mitigated Negative Declaration  
32<sup>nd</sup> & Broadway  
Project No. 637438


Dear Ms. Kennedy:

I have reviewed the subject DMND on behalf of this committee of the San Diego County Archaeological Society.

Based on the information contained in the DMND and the cultural resources report prepared by Brian F. Smith & Associates, we agree that no significant impacts to cultural resources are likely to result from the project. We therefore agree that no cultural resources mitigation measures are required.

Thank you for the opportunity to review and comment upon this DMND.

Sincerely,

  
James W. Royle, Jr., Chairperson  
Environmental Review Committee

cc: Brian F. Smith & Associates  
SDCAS President  
File

**Response 1**

R1-1. Comment Noted

C1-1

## INITIAL STUDY CHECKLIST

1. Project title/Project number: 637438 / 32nd & Broadway
2. Lead agency name and address: City of San Diego, 1222 First Avenue, MS-501, San Diego, California 92101
3. Contact person and phone number: Jamie Kennedy / (619) 446-5445
4. Project location: The 1.211-acre unimproved site is located east of 32nd Street, north of State Route 94, within the San Diego International Airport (SDIA) Noise Contours Overlay Zone (65-70 CNEL), the Airport Influence Area (SDIA - Review Area 1), the Federal Aviation Administration (FAA) Part 77 Noticing Area (SDIA threshold at 175 feet AMSL), within the Greater Golden Hill Community Plan area and Council District 3. The project is located in Environmentally Sensitive Land with sensitive biological resources (Tier II habitat).
5. Project Applicant/Sponsor's name and address: 32nd & Broadway, LLC. 3184 Airway Avenue, Suite B, Costa Mesa, CA 92626
6. General/Community Plan designation: Residential - Low Medium density
7. Zoning: RM-1-1 (Residential – Multiple Unit)
8. Description of project (Describe the whole action involved, including but not limited to, later phases of the project, and any secondary, support, or off-site features necessary for its implementation.):

The project is a Right of Way Vacation of an unimproved 0.47-acre (20,348 square-foot), 65-foot wide, portion of Broadway from 32<sup>nd</sup> Street to the project's eastern boundary; a Tentative Map for the proposed subdivision and consolidation of 12 lots into one and construction of 38 residential condominiums; a Site Development Permit for a proposed retaining wall within the 32<sup>nd</sup> Street public right of way when the applicant is not the record owner of the property; and Neighborhood Development Permit for proposed development on a site containing Environmentally Sensitive Lands (ESL), and to allow requested deviations from required side setback, floor area ratio, angled building envelope, and retaining wall height pursuant to SDMC Section 143.0920 for a project that qualifies as an Affordable Housing, Infill, Sustainable Development project per SDMC Section 143.0915. the Construction consists of a 38-unit residential development consisting of 34 market rate residential condominium units and four affordable moderate-income units in six, three-story buildings, and to vacate the public right of way of Broadway between 32nd and 33rd streets. Parking for 628 vehicles would include two electrical vehicle charging stations. consist of 62 general parking spaces, f Four motorcycle spaces and common area would also be built. Landscape improvements also include a retaining wall, streetscape, perimeter and interior landscape, and paved common open space.
9. Surrounding land uses and setting:

The project is surrounded by undeveloped disturbed land to the north, multifamily residences to the east, State Route 94 to the south, and single-family residences to the west.

10. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):

None required.

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, has consultation begun?

As required by AB 52, City of San Diego (City) staff sent notification, including a cultural resources report (CRR), on 7/3/19 to the local Kumeyaay community for possible consultation on this project. Representatives of the Lipay and Jamul communities concurred with the CRR conclusions which determined that archaeological monitoring is not necessary for the project. The Kumeyaay representatives determined that tribal cultural resources mitigation, and Native American monitoring, is not required for the project and closed AB 52 consultation on 7/12/19.

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21083.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

**ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:**

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

- |   |  |  |
|---|--|--|
| <input type="checkbox"/> Aesthetics                         | <input type="checkbox"/> Greenhouse Gas Emissions      | <input type="checkbox"/> Public Services                 |
| <input type="checkbox"/> Agriculture and Forestry Resources | <input type="checkbox"/> Hazards & Hazardous Materials | <input type="checkbox"/> Recreation                      |
| <input type="checkbox"/> Air Quality                        | <input type="checkbox"/> Hydrology/Water Quality       | <input type="checkbox"/> Transportation/Traffic          |
| <input checked="" type="checkbox"/> Biological Resources    | <input type="checkbox"/> Land Use/Planning             | <input type="checkbox"/> Tribal Cultural Resources       |
| <input type="checkbox"/> Cultural Resources                 | <input type="checkbox"/> Mineral Resources             | <input type="checkbox"/> Utilities/Service System        |
| <input type="checkbox"/> Energy                             | <input type="checkbox"/> Noise                         | <input type="checkbox"/> Wildfire                        |
| <input type="checkbox"/> Geology/Soils                      | <input type="checkbox"/> Population/Housing            | <input type="checkbox"/> Mandatory Findings Significance |

**DETERMINATION: (To be completed by Lead Agency)**

On the basis of this initial evaluation:

- ☐ The proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☒ Although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☐ The proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ The proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect (a) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (b) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required.
- ☐ Although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or (MITIGATED) NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or (MITIGATED) NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.



## EVALUATION OF ENVIRONMENTAL IMPACTS:

- 1) A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis.)
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
- 4) “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from “Earlier Analyses”, as described in (5) below, may be cross-referenced).
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or (mitigated) negative declaration. *Section 15063(c)(3)(D)*. In this case, a brief discussion should identify the following:
  - a. Earlier Analysis Used. Identify and state where they are available for review.
  - b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
  - c. Mitigation Measures. For effects that are “Less Than Significant With Mitigation Measures Incorporated”, describe the mitigation measures that were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project’s environmental effects in whatever format is selected.
- 9) The explanation of each issue should identify:
  - a. The significance criteria or threshold, if any, used to evaluate each question; and
  - b. The mitigation measure identified, if any, to reduce the impact to less than significant.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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I. AESTHETICS – Would the project:

- |   |                          |                          |                                     |                          |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a) Have a substantial adverse effect on a scenic vista? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

There are no public view corridors or any designated scenic roadways on or directly adjacent to the project site. The nearest view corridor is north of the site on C street facing east and would not be impacted by the subject project. A small portion of the project to the northeast is located within a viewshed located at 32<sup>nd</sup> and C street looking south. However, the project is moderate in scale and does not exceed the allowed bulk or height pursuant to State and Municipal density bonus and affordable housing regulations. Therefore, impacts to public views would be less than significant.

- |   |                          |                          |                          |                                     |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| b) Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

The project is situated within a developed residential neighborhood. The project is not located within or adjacent to a state scenic highway, nor does it contain any scenic resources. Therefore, no impacts would result.

- |   |                          |                          |                                     |                          |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| c) Substantially degrade the existing visual character or quality of the site and its surroundings? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

The project site is located adjacent to similar multi-family residential development. The project is compatible with the surrounding development, permitted by the community plan and zoning designation, and consistent with urban design policies in the community plan, and compliant with State and Municipal density bonus and affordable housing regulations. The project would not degrade the existing visual character or quality of the site and its surroundings; therefore, impacts would be less than significant.

- |  |                          |                          |                                     |                          |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| d) Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

The project would comply with the outdoor lighting standards contained in Municipal Code Section 142.0740 (Outdoor Lighting Regulations) that require all outdoor lighting be installed, shielded, and adjusted so that the light is directed in a manner that minimizes negative impacts from light pollution, including trespass, glare, and to control light from falling onto surrounding properties. Therefore, lighting installed with the project would not adversely affect day or nighttime views in the area, resulting in a less than significant lighting impact.

The project would also comply with Municipal Code Section 142.0730 (Glare Regulations) that requires exterior materials utilized for proposed structures to be limited to specific reflectivity ratings. The structure would be constructed with non-reflective materials, primarily stucco and wood siding. The project would have a less than significant glare impact.

II. AGRICULTURAL AND FOREST RESOURCES: In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. – Would the project:

- a) Converts Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

☐
☐
☐
☒

The project site does not contain and is not adjacent to any lands identified as Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as show on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resource Agency. Therefore, the project would not result in the conversion of such lands to non-agricultural use and no impact would occur.

- b) Conflict with existing zoning for agricultural use, or a Williamson Act Contract?

☐
☐
☐
☒

The project is consistent with the community plan's zoning. The subject property is not zoned for agricultural use. There are no Williamson Act Contract lands on or within the vicinity of the project. No impact would occur.

- c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 1220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

☐
☐
☐
☒

The project would not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production. No designated forest land or timberland occur onsite as the project is consistent with the community plan, and the underlying zone. No impact would occur.

- d) Result in the loss of forest land or conversion of forest land to non-forest use?

☐
☐
☐
☒

The project does not contain forest land. No impact would occur.

- e) Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland to non-

☐
☐
☐
☒



Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
agricultural use or conversion of forest land to non-forest use?				

Refer to response II (a) and II (c), above. The project and surrounding areas do not contain any farmland or forest land. Therefore, no impact would occur.

III. AIR QUALITY – Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied on to make the following determinations – Would the project:

- |   |                          |                          |                          |                                     |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Conflict with or obstruct implementation of the applicable air quality plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

The San Diego Air Pollution Control District (SDAPCD) and San Diego Association of Governments (SANDAG) are responsible for developing and implementing the clean air plan for attainment and maintenance of the ambient air quality standards in the San Diego Air Basin (SDAB). The County Regional Air Quality Strategy (RAQS) was initially adopted in 1991 and is updated on a triennial basis (most recently in 2009). The RAQS outlines the SDAPCD's plans and control measures designed to attain the state air quality standards for ozone (O<sub>3</sub>). The RAQS relies on information from the California Air Resources Board (CARB) and SANDAG, including mobile and area source emissions, as well as information regarding projected growth in San Diego County and the cities in the county, to project future emissions and then determine the strategies necessary for the reduction of emissions through regulatory controls. CARB mobile source emission projections and SANDAG growth projections are based on population, vehicle trends, and land use plans developed by San Diego County and the cities in the county as part of the development of their general plans.

The RAQS relies on SANDAG growth projections based on population, vehicle trends, and land use plans developed by the cities and by the county as part of the development of their general plans. As such, projects that propose development that is consistent with the growth anticipated by local plans would be consistent with the RAQS. However, if a project proposes development that is greater than that anticipated in the local plan and SANDAG's growth projections, the project might be in conflict with the RAQS and may contribute to a potentially significant cumulative impact on air quality.

The project would build 38 units in six, three-story buildings within a developed neighborhood. The proposed housing is consistent with the General Plan Housing Element, ~~the Greater Golden Hill Community Plan, and the underlying zoning. The Housing Element of the City's General Plan serves as a policy guide to address the comprehensive housing needs of the City of San Diego. The intent of the Housing Element is to assist with the provision of adequate housing to serve San Diegans of every economic level and demographic group and includes reliance and analysis of the use of affordable housing and density bonus to achieve projected residential housing needs. Specific to affordable housing, Goal 4 of the Housing Element is to "provide affordable housing opportunities consistent with a land use pattern which promotes infill development and socioeconomic equity; and facilitate compliance with all applicable federal, state, and local laws and regulations". Policy direction specific to density bonus is to:~~

- Encourage and promote the use of available Housing Density Bonus Programs. Future consideration should be given to further expanding density bonus incentives and provisions.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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• Enforce all federal, state, and local ordinances or regulations pertaining to land use incentives which promote affordable housing opportunities for low- and moderate income homebuyers, such as inclusionary housing and density bonus.

As identified under the description of the Project, the Project includes a density bonus pursuant to California Government Code Section 65915 (State Density Bonus Law) as well as the City's Land Development Code (LDC) consistent with State Law, and would provide two (2) more units than the maximum density per the Greater Golden Hill Community Plan. In addition, the Project would be locating growth in an area outlined in the General Plan where growth should occur and would not significantly increase the number of trips for the site. The Transportation Impact Analysis (Darnell & Associates, September 1, 2020) showed that the Project would generate 6 Average Daily Trips (ADTs) per dwelling unit, and the addition of two units would generate 12 more ADTs than what the community plan allows. Therefore, the project would be consistent at a sub-regional level with the underlying growth forecasts in the RAQS and would not conflict with or obstruct implementation of the RAQS. No impact would occur.

b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Short-term and long-term emissions are detailed in "32nd & Broadway, LLC – Golden Hill Project Health Risk Assessment Technical Memorandum" prepared by Ascent Environmental, July 2020.

#### Short-term Emissions (Construction)

Project construction activities would potentially generate combustion emissions from on-site heavy-duty construction vehicles and motor vehicles transporting the construction crew and necessary construction materials. Exhaust emissions generated by construction activities would generally result from the use of typical construction equipment that may include excavation equipment, forklift, skip loader, and/or dump truck. Variables that factor into the total construction emissions potentially generated include the level of activity, length of construction period, number of pieces and types of equipment in use, site characteristics, weather conditions, number of construction personnel, and the amount of materials to be transported on or off-site. It is anticipated that construction equipment would be used on-site for four to eight hours a day; however, construction would be short-term and impacts to neighboring uses would be minimal and temporary.

Fugitive dust emissions are generally associated with land clearing and grading operations. Due to the nature and size of the project, construction activities are expected to create minimal fugitive dust, as a result of the disturbance associated with grading. Construction operations would include standard measures as required by the City of San Diego grading permit to reduce potential air quality impacts to less than significant. In addition, construction activities would be required to comply with the City's Best Management Practices (BMPs) which are enforceable under SDMC 142.0710. 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. Impacts related to short term emissions would be less than significant.

#### Long-term Emissions (Operational)

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Long-term air emission impacts are those associated with stationary sources and mobile sources related to any change caused by a project. The project would produce minimal stationary source emissions. Once construction of the project is complete, long-term air emissions would potentially result from such sources as cars parking on the lot. However, the project is compatible with the surrounding development and is permitted by the community plan and zone designation. Based on the residential 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.

- |   |                          |                          |                                     |                          |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

As described above in response III. b), construction operations may 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 (BMP's) would reduce potential impacts related to construction activities to a less than significant level. Therefore, the project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under applicable federal or state ambient air quality standards. Impacts would be less than significant.

- |   |                          |                          |                                     |                          |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| d) Create objectionable odors affecting a substantial number of people? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

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 and impacts would be less than significant.

#### IV. BIOLOGICAL RESOURCES – Would the project:

- |   |                          |                                     |                          |                          |
|---|--------------------------|-------------------------------------|--------------------------|--------------------------|
| a) Have substantial adverse effects, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|-------------------------------------|--------------------------|--------------------------|

Per the Biological Resources Technical Report (BRTR) prepared by Cadre Environmental November 2020, a total of 0.23-acre of disturbed coastal sage scrub located outside of the MHPA will be directly



Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
impacted as a result of project implementation. A mitigation ratio of 1:1 for impacts to Tier II (uncommon uplands, coastal sage scrub, coastal sage scrub/chaparral) will be required. Prior to construction, the project applicant will provide monitory compensation to the <del>Cities</del> <u>City's</u> Habitat Acquisition Fund (HAF) as established by the City Council. Therefore, the total resulting mitigation required for direct project impacts is a total of a 0.23-acre equivalent contribution to the HAF plus a ten percent (10%) administrative fee. Impacts would be less than significant with the implementation of Mitigation Measure BIO-1 in section V. of the MND.				
b) Have a substantial adverse effect on any riparian habitat or other community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>A perennial urban drainage ditch extending southwest from an existing residential development is located immediately southeast of the Project Site and extends under SR 94 through a culvert. No riparian scrub, forest, woodland or wetland dependent vegetation is located within or adjacent to the drainage ditch. The urban drainage ditch does not meet definition of wetlands as defined by the Per the City of San Diego Biology Guidelines (City of San Diego 2018).</p> <p>The project will include the development of one (1) onsite bioretention basin for the capture, treatment and release of project related runoff to the adjacent perennial urban drainage ditch. The proposed project will not directly impact the drainage ditch. As warranted, the project will comply with all applicable water quality regulations, including obtaining and complying with those conditions established in State Waste Discharge Requirements (WDRs) and National Pollutant Discharge Elimination System (NPDES) permits. Both of these permits include the treatment of all surface runoff from paved and developed areas, the implementation of applicable Best Management Practices (BMPs) during construction activities and the installation and proper maintenance of structural BMPs to ensure adequate long-term treatment of water before entering into any stream course or offsite conservation areas. Therefore, impacts would be less than significant.</p>				
c) Have a substantial adverse effect on federally protected wetlands as defined by section 404 of the Clean Water Act (including but not limited to marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>See IV. b). Compliance with state and federal regulations protecting storm water would ensure impacts are less than significant.</p>				
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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The Project Site and adjacent offsite impact areas are bordered to the east and west by high density residential development and north and south by high traffic roadways (SR 94 and C Street). The Project Site is not located within or a wildlife movement route, corridor, or linkage area. Impacts to the movement of wildlife would be less than significant.

- |   |                          |                          |                          |                                     |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

The proposed project is not within the City's Multi-Habitat Planning Area (MHPA) and is consistent with all relevant goals and policies regarding the preservation and protection of biological resources, as outlined in the City's Multiple Species Conservation Program (MSCP). No impact would result due to implementation of the project.

- |  |                          |                          |                          |                                     |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

See reply IV e) above; no impact would result.

#### V. CULTURAL RESOURCES – Would the project:

- |   |                          |                          |                                     |                          |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a) Cause a substantial adverse change in the significance of an historical resource as defined in §15064.5? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

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. Before approving discretionary projects, CEQA requires the Lead Agency to 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.

#### Archaeological Resources

According to City of San Diego Development Services Department archaeological resources sensitivity maps, the project site is not located in an area that is sensitive for the discovery of archaeological resources. According to the Phase I Cultural Resource Survey (CRS) for the 32nd & Broadway Project prepared by Brian F. Smith & Associates November 5, 2018, there are no recorded sites within or near the Area of Potential Effect, and no archaeology sites or artifacts were identified during Site Reconnaissance. Due to site conditions and the nature of infill development,

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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archaeological monitoring is not recommended for the proposed project. Based on the conclusions and recommendations of the CRS, the project would result in a less than significant impact on archaeological resources and no mitigation is required.

#### Built Environment

No structures exist on the subject property. No impact would occur to built environment resources.

- |   |                          |                          |                                     |                          |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

Please see response V. a). Impacts would be less than significant.

- |   |                          |                          |                                     |                          |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

According to the "Geotechnical Investigation Report for the Proposed 32nd & Broadway Homes" dated 5/24/19 by NOVA Services, Inc., the project site is underlain by Baypoint and San Diego geologic formations both of which have a high sensitivity for the discovery of paleontological resources. However, the project's Development Plans indicate maximum excavation depth would be 9.2 feet. Since maximum excavation depth for the project would be less than the 10-foot depth significance threshold for impacts to paleontological resources stated in the City of San Diego CEQA Significance Determination Thresholds, impacts to paleontological resources would be less than significant and no mitigation would be required.

- |   |                          |                          |                                     |                          |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| d) Disturb any human remains, including those interred outside of dedicated cemeteries? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

See V. a) above. Human remains were not identified in the CRS. Impacts would be less than significant.

#### VI. ENERGY – Would the project:

- |   |                          |                          |                                     |                          |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

During project construction, the Air Resources Board regulates idling for commercial motor vehicles to reduce unnecessary consumption of energy under 13 CCR § 2485, Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling. Through implementation of this measure, energy consumption during construction would be less than significant.

The proposed residential development would result in minimal energy utilization during operation. Energy usage may incrementally increase once residences are built. See also section VIII,



Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Greenhouse Gas Emissions. Energy impacts, if any, would be minimal and less than significant. No mitigation is required.				
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The project is consistent with the General Plan and Community Plan's underlying land use and zoning designations, and appropriately implements the Climate Action Plan checklist. See also section VIII, Greenhouse Gas Emissions. Because the project does not conflict with or obstruct the Climate Action Plan, no impact would occur.

#### VII. GEOLOGY AND SOILS – Would the project:

- a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:
- i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.
- |                          |                          |                                     |                          |
|--------------------------|--------------------------|-------------------------------------|--------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--------------------------|--------------------------|-------------------------------------|--------------------------|

The applicant has submitted "Report of Geotechnical Investigation, Proposed 32<sup>nd</sup> & Broadway Homes, San Diego" prepared by NOVA Services, Inc. dated May 24, 2019. The project is not located within an Alquist-Priolo Fault Zone. No known active faults are mapped on the site area. Because of the lack of known active faults on the site, the potential for surface rupture at the site is considered low.

The project is located in Geologic Hazard Category 52, Other level areas, gently sloping to steep terrain, favorable geologic structure, low risk. Shallow ground rupture due to shaking from distant seismic events is not considered a significant hazard. The project would be required to comply with seismic requirement of the California Building Code and utilize proper engineering design and utilization of standard construction practices.

Prior to the issuance of any construction permits (either grading or building permit), the Owner/Permittee shall submit a geotechnical investigation report prepared in accordance with the City's "Guidelines for Geotechnical Reports" that specifically addressed the proposed construction plans. The geotechnical investigation report shall be reviewed for adequacy by the Geology Section of Development Services prior to the issuance of any construction permit. Potential impacts based on regional geologic hazards would remain less than significant.

- ii) Strong seismic ground shaking?
- |                          |                          |                                     |                          |
|--------------------------|--------------------------|-------------------------------------|--------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--------------------------|--------------------------|-------------------------------------|--------------------------|

No known active faults are mapped on the site area. The nearest known active faults are within the Rose Canyon fault system. The closest faults within this system lie in the downtown graben, located

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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approximately 1.5 miles west of the site. This system has the potential to be a source of strong ground motion. The potentially active (pre-Holocene) Texas Street Fault is about 0.4 miles west of the site. There is no evidence of movement on this fault within the last 11,700 years. The project would utilize proper engineering design and utilization of standard construction practices, to be verified at the construction permit stage, in order to ensure that potential impacts from regional geologic hazards would remain less than significant.

iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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See reply to VII. a) i) above. In addition, the dense and geologically 'older' subsurface units at this site have no potential for liquefaction.

iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Though the site is set in an area where the ground surface slopes on the order of 10% to 20%, the formational geologic units that underlie the area are not associated with landslide susceptibility. The geotechnical investigation concludes the landslide hazard is 'low' for the site and its immediately surrounding area. 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 would be reduced to an acceptable level of risk. Impacts would be less than significant.

b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Demolition and construction activities would temporarily expose soils to increased erosion potential. The project would be required to comply with the City's Storm Water Standards which requires the implementation of appropriate Best Management Practices (BMPs). Grading activities within the site would be required to comply with the City of San Diego Grading Ordinance as well as the Storm Water Standards, which would ensure soil erosion and topsoil loss is minimized to less than significant levels. Furthermore, permanent storm water BMPs would also be required postconstruction consistent with the City's regulations. Therefore, the project would not result in substantial soils erosion or loss of topsoil, and impacts would be less than significant.

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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See reply to VII. a) iii) above. Apart from liquefaction, a strong seismic event can induce settlement within loose to moderately dense, unsaturated granular soils. The soils of this site will not be prone to seismic settlement. Due to the absence of a potential for liquefaction, there is no potential for lateral spreading.

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Testing indicated 'Low' to 'Very Low' expansion potential. However, clay layers maybe encountered during mass grading at the site that will require mixing with other non-expansive soils to create a low expansive material. This measure will ensure impacts would be less than significant.

- |  |                          |                          |                          |                                     |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

The project site is located within an area that is already developed with existing infrastructure (i.e., water and sewer lines) and does not propose any septic system. In addition, the project does not require the construction of any new facilities as it relates to wastewater, as services are available to serve the project. No impact would occur.

#### VIII. GREENHOUSE GAS EMISSIONS – Would the project:

- |   |                          |                          |                                     |                          |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

The City's Climate Action Plan (CAP) outlines the actions that the City will undertake to achieve its proportional share of State greenhouse gas (GHG) emission reductions. A CAP Consistency Checklist is part of the CAP and contains measures that are required to be implemented on a project-by-project basis to ensure that the specified emission targets identified in the CAP are achieved. The project is consistent with the General Plan and Community Plan land use and zoning designations with allowable deviations. Further based upon review and evaluation of the completed CAP Consistency Checklist, the project is consistent with the applicable strategies and actions of the CAP. Based on the project's consistency with the City's CAP Checklist, the project's contribution of GHG's to cumulative statewide emissions would be less than cumulatively considerable. Therefore, the projects direct and cumulative GHG emissions would have a less than significant impact.

- |   |                          |                          |                                     |                          |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

The project would not conflict with an applicable plan, policy, or regulation adopted for the purposes of reducing the emissions of greenhouse gasses. The project is consistent with the existing General Plan and Community Plan land use and zoning designations. Further based upon review and evaluation of the completed CAP Consistency Checklist for the project, the project is consistent with the applicable strategies and actions of the CAP. Therefore, the project is consistent with the assumptions for relevant CAP strategies toward achieving the identified GHG reduction targets. Impacts are considered less than significant.

#### IX. HAZARDS AND HAZARDOUS MATERIALS – Would the project:

- |   |                          |                          |                                     |                          |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a) Create a significant hazard to the public or the environment through routine | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
transport, use, or disposal of hazardous materials?				
<p>Construction of the project may require the use of hazardous materials (fuels, lubricants, solvents, etc.), which would require proper storage, handling, use and disposal; however, the project would not routinely transport, use, or dispose of hazardous materials. Therefore, the project would not create a significant hazard to the public or environment.</p>				
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>DSD Environmental Analysis staff conducted a search of the State Water Resources Control Board GeoTracker website data management system (<a href="http://geotracker.waterboards.ca.gov/database">http://geotracker.waterboards.ca.gov/database</a>). There are no cleanup sites, underground storage tanks, hazardous waste sites, or land disposal sites in the project vicinity. Therefore, the potential to encounter hazardous materials is less than significant, and no mitigation is required.</p>				
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>See reply III. b). The project would produce minimal construction and operation emissions from vehicles, and temporary impacts from fugitive dust. The project is located within one quarter mile of Golden Hill Elementary School. However, it would not involve hazardous emissions or handling acutely hazardous materials, substances, or waste. Therefore, impacts from hazardous emissions would be less than significant.</p>				
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Government Code sections 65962.5 requires the California Environmental Protection Agency to develop, at least annually, an updated Cortese List. The Department of Toxics and Substance Control (DTSC) is responsible for a portion of the information contained in the Cortese List. The project site was not identified on the DTSC Cortese List. Therefore, no impact would occur.</p>				
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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The project is located in the Airport Influence Area (AIA) Review Area 1 for the San Diego International Airport (SDIA) as depicted in the adopted 2014 Airport Land Use Compatibility Plan (ALUCP). The project is located in the 60-65 decibel (dB) Community Noise Equivalent Level (CNEL). The ALUCP requires new residential uses above the 60 dB CNEL provide noise attenuation to ensure an interior noise level of 45 dB CNEL for all habitable rooms, which is depicted on the title sheet on project plans.

In addition, the maximum height of the proposed project is approximately 164 feet Above Mean Sea Level (AMSL). The project is within the 262-300-foot contour of the City's Airport Approach Overlay Zone (AAOZ). The FAA Part 77 notification surface for SDIA is ~~below the site at 75-80 175 feet AMSL~~ and the Part 77 notification surface for North Island Naval Air Station is ~~below the site at 116-121 feet AMSL~~. ~~The proposed structure is also within an instrument approach area and is in proximity to a navigation facility, which may impact the assurance of navigation signal reception; The applicant submitted a self-certification agreement stating that new development would be shielded by existing structures and natural terrain;~~ therefore, FAA notification is not required. The City is required to submit the proposed project to the San Diego County Regional Airport Authority, serving as the Airport Land Use Commission (ALUC), for a consistency determination with the adopted ALUCP for SDIA prior to final approval.

A determination application was sent via email to ALUC on October 3, 2019. On October 30, 2019, the ALUC determined that the proposed project is conditionally consistent with the SDIA ALUCP based upon the facts and findings summarized within its determination letter. Because the project is consistent with the noise and land use policies of the ALUCPs, impacts to safety would be less than significant.

- |   |                          |                          |                                     |                          |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

See reply to IX. d) above.

- |   |                          |                          |                          |                                     |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

The project would not impair the implementation of, or physically interfere with, an adopted emergency response plan or evacuation plan. The project was reviewed by the City Fire Department, and the project meets fire access requirements. No impact would occur.

- |  |                          |                          |                                     |                          |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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The 2017 San Diego County Multi-Jurisdictional Hazard Mitigation Plan (SDHMP) is the San Diego region's plan toward greater disaster resilience in accordance with section 322 of the Disaster Mitigation Act of 2000. The project would not conflict with the goals, objectives, and actions of the SDHMP. Per Action 1.D.6, High fire hazard areas shall have adequate access for emergency vehicles. The project is located in a Very High Fire Hazard Severity Zone (VHFHSZ). The project was reviewed by the City Fire Department, and the project meets fire access requirements. Therefore, the project would not conflict with emergency response and would not substantially impair an adopted emergency response plan. Impacts would be less than significant.

X. HYDROLOGY AND WATER QUALITY - Would the project:

- |   |                          |                          |                          |                                     |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Violate any water quality standards or waste discharge requirements? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

The applicant has submitted a Water Quality Study that Identified pollutants from the project area and identified how Best Management Practices (BMPs) would be incorporated into the project that would ensure compliance with water quality regulations. Compliance with the City of San Diego's Storm Water Standards would ensure the project would not violate any water quality standards or discharge requirements. No impact would occur.

- |   |                          |                          |                          |                                     |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

The project does not require the construction of wells or the use of groundwater. Furthermore, the project would not introduce significant new impervious surfaces that could interfere with groundwater recharge, as the site is already developed with impervious surfaces. Therefore, the project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge. The project is located in an urban neighborhood where all infrastructures exist. The project would connect to the existing public water system. No impact would result.

- |   |                          |                          |                                     |                          |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner, which would result in substantial erosion or siltation on- or off-site? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

The project would not substantially alter the existing drainage pattern of the site or the area. There are no streams or rivers located on-site. Southeast of the project site is a seasonal drainage feature that would not be modified by the project. The project will include the development of one onsite bioretention basin for the capture, treatment and release of project related runoff to the adjacent perennial urban drainage ditch. During construction, the project would be required to implement



Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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BMPs to ensure that substantial erosion or siltation on or off-site would not occur. Impacts would be less than significant.

- |  |                          |                          |                                     |                          |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner, which would result in flooding on- or off-site? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

The applicant has submitted Drainage Report, 32<sup>nd</sup> and Broadway, prepared by Coffee Engineering dated June 30, 2020. The report concludes the site will feature a larger discharge to the existing drainage system, a 60" reinforced concrete pipe, from 3.35 cubic feet per second (cfs) to 5.13 cfs. However, the construction will only increase the 60" RCP's capacity by 0.4%. There are no anticipated impacts to adjacent properties as all storm water runoff from the project discharges directly into the drainage easement. 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.

- |  |                          |                          |                                     |                          |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| e) Create or contribute runoff water, which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

See reply to X c) and d) above. 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 is required.

- |   |                          |                          |                                     |                          |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| f) Otherwise substantially degrade water quality? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

See replies to X a) – d) above. Impacts would be less than significant.

- |  |                          |                          |                          |                                     |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

The project site is not located within a 100-year flood hazard area or any other known flood area. Therefore, no impacts would occur.

- |   |                          |                          |                          |                                     |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| h) Place within a 100-year flood hazard area, structures that would impede or redirect flood flows? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

The project site is not located within a 100-year flood hazard area; thus, no impact would occur.

XI. LAND USE AND PLANNING – Would the project:

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The construction of 38 units in six residential structures and right of way vacation would not physically divide an established community. No impact would occur.

b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The construction of 38 units in six residential structures and right of way vacation would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect. The project was reviewed and considered consistent with community plan land use as the provisions of the Affordable Housing Regulations are met to allow the additional units as a density bonus. The street vacation can be supported. Thus, no impact would occur.

c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The project is not located within or adjacent to the MHPA. Thus, no impact would occur.

#### XII. MINERAL RESOURCES – Would the project:

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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DSD Environmental analysis staff consulted the Open File Report 96-04, Update of Mineral Land Classification: Aggregate Materials in the Western San Diego County Production – Consumption Region, 1996. The project site is not located in the MRZ-2 classification area, is smaller than 10 acres, and would not preclude a mining operation adjacent to the site. The site is not currently being mined. No impact would occur.

b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The project site has not been delineated on a local general, specific or other land use plan as a locally important mineral resource recovery site, and no such resources would be affected with project implementation. Therefore, no impact would occur.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIII. NOISE – Would the project result in:				
a) Generation of, noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>The applicant has submitted an Acoustical Analysis Report (AAR) for the 32 &amp; Broadway project dated March 22, 2019 by Eilar Associates, Inc. AAR calculations indicate that, with sound attenuation barriers (balcony walls) shown in AAR Table 7 incorporated into the project as design features, all private outdoor use areas are expected to comply with the noise requirements of the City of San Diego General Plan Noise Element with respect to traffic noise.</p> <p>The sound barriers will be required as a condition of the project's discretionary permit approval to ensure that they will be implemented as a design feature. With the conditions of approval, potential noise levels would be within standards established by the General Plan. Noise impacts would be less than significant.</p>				
b) Generation of, excessive ground borne vibration or ground borne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Per the AAR, this project is not anticipated to generate any significant vibration due to construction equipment. No significant vibration impacts are expected.</p>				
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>The future on-site noise environment is expected to be the result of the same noise sources: aircraft, surrounding street traffic, and SR-94. Future aircraft noise is not expected to increase due to the project. A conservative estimate of 1,000 ADT in the vicinity of the project site was estimated for 32<sup>nd</sup> Street by 2035. By 2035, the traffic for SR-94 is expected to be 81,600 westbound and 94,700 eastbound. With the incorporation of sound attenuation barriers and an avigation easement, outdoor use areas are expected to comply with the City of San Diego Noise Element to the General Plan.</p>				
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>The City of San Diego Municipal Code prohibits construction between the hours of 7 p.m. and 7 a.m. and on Sundays and legal holidays. During hours of operation, noise levels must be limited to a twelve-hour average of no more than 75 dBA at any residential property line. Temporary construction noise impacts are not expected to exceed 75 dBA at any sensitive noise receivers during any phases of construction.</p>				
e) For a project located within an airport land use plan, or, where such a plan has not been adopted, within two miles	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
of a public airport or public use airport would the project expose people residing or working in the area to excessive noise levels?				

According to the AAR, exterior noise levels from airplane noise can exceed 65 CNEL if an aviation easement is provided by the property owner to the San Diego Regional Airport Authority and interior noise levels are reduced to below 45 CNEL in residential spaces. An aviation easement will be required as a condition of approval for this project's discretionary permits.

Calculations in the AAR demonstrate that interior noise levels will be less than 45 CNEL with the acoustical recommendations (e.g. mechanical ventilation, exterior wall construction) shown in the AAR incorporated into the project design. All acoustical recommendations in the AAR will be conditions of the project's discretionary permit approval to ensure that interior noise levels will be less than 45 CNEL in residential spaces. Impacts from noise would be less than significant.

f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The project site is not located within the vicinity of a private airstrip. No impacts would result.

#### XIV. POPULATION AND HOUSING – Would the project:

a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The project site is located in a developed residential neighborhood and is surrounded by similar residential development. The project site is currently developed, and the project will include with the connections to receive water and sewer service from the City, and No extension of infrastructure to new areas is required. As such, the Project connections to existing City infrastructure would not substantially increase housing or population growth in the area. No additional roadway capacity would be increased as part of the project. Population growth would be less than significant.

b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The project is on a vacant lot. No housing would be displaced, and no impact would occur.

c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The project is on a vacant lot. No people would be displaced, and no impact would occur.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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#### XV. PUBLIC SERVICES

- a) Would the project result in substantial adverse physical impacts associated with the provisions of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service rations, response times or other performance objectives for any of the public services:

i) Fire protection	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Police protection	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Schools	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Parks	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
v) Other public facilities	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The project was reviewed by the City's Parks and Recreation department for conformance with the City's General Plan guidelines for population-based parks, the Golden Hill Community Plan, and the Golden Hill Impact Fee Study. The project meets conditions for private park improvements to receive population-based park credit.

The project site is located in an urbanized and developed area where fire, police, public schools, parks, and other City services are already provided. The project would not adversely affect existing levels of fire and police protection services to the area and would not require the construction of new or expanded government facilities. Therefore, no significant impact would occur.

#### XVI. RECREATION

- a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?
- |                          |                          |                                     |                          |
|--------------------------|--------------------------|-------------------------------------|--------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--------------------------|--------------------------|-------------------------------------|--------------------------|

Although the project would bring additional people into the neighborhood and would result in a minor increase in the use of existing neighborhood and regional parks, it is anticipated by the community plan. Substantial physical deterioration would not occur, and impacts would be less than significant. See also response to XV. a).

- b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?
- |                          |                          |                          |                                     |
|--------------------------|--------------------------|--------------------------|-------------------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--------------------------|--------------------------|--------------------------|-------------------------------------|

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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The project is not providing any recreational facilities on site and will satisfy the General Plan standard population-based park requirements by paying the Golden Hill Development Impact Fee (DIF) for the proposed units. The park portion of the current per-unit Development Impact Fee (DIF), to be paid at the time off building permit issuance, provides for public facilities required to support the proposed population including the population-based park usable acreage, recreation centers and aquatic complexes.

XVII. TRANSPORTATION/TRAFFIC – Would the project?

- |   |                          |                          |                          |                                     |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Would the project or plan/policy conflict with an adopted program, plan, ordinance or policy addressing the transportation system, including transit, roadways, bicycle and pedestrian facilities? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

The construction of 38 units in six residential buildings and right of way vacation would not conflict an adopted program, plan, ordinance or policy addressing the transportation system, including transit, roadways, bicycle and pedestrian facilities, or decrease the performance or safety of such facilities. No impact would occur.

- |   |                          |                          |                                     |                          |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| b) Would the project or plan/policy result in VMT exceeding thresholds identified in the City of San Diego Transportation Study Manual? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

Per the September 2020 Transportation Analysis prepared by Darnell and Associates, "The project is presumed to have less than significant VMT impact because it is located within Census Tract 41 with a 2016 residential VMT per capita of 13.7 miles, which is 72.3% of the 2016 regional average of 19.0 miles per resident, and therefore under 85% of the regional average VMT/capita." The project's transportation impact is presumed to be less than significant, and no mitigation is required.

- |   |                          |                          |                                     |                          |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| c) Would the project or plan/policy substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

The project has been reviewed and meets all access and transportation safety requirements. The project would not substantially increase hazards due to design features or incompatible uses. Impacts would be less than significant.

- |   |                          |                          |                                     |                          |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| d) Result in inadequate emergency access? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

Adequate emergency access would be provided during both short-term construction (with construction operating protocols) and long-term operations of the project. Emergency access to the site is provided on the fire access plan via the cul de sac. As such, the project would not impair



Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Impacts would be less than significant.

XVIII. TRIBAL CULTURAL RESOURCES – Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

- |  |                          |                          |                          |                                     |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

Please see response to V. b) above. There are no resources on site that would be eligible for listing in the local or state register of historical resources. No impact would occur.

- |   |                          |                          |                                     |                          |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

As required by AB 52, City of San Diego (City) staff sent notification, including a cultural resources report (CRR), on 7/3/19 to the local Kumeyaay community for possible consultation on this project. Representatives of the Lipay and Jamul communities concurred with the CRR conclusions which determined that archaeological monitoring is not necessary for the project. The Kumeyaay representatives determined that tribal cultural resources mitigation, and Native American monitoring, is not required for the project and closed AB 52 consultation on 7/12/19.

XIX. UTILITIES AND SERVICE SYSTEMS – Would the project:

- |   |                          |                          |                                     |                          |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

Implementation of the project would not interrupt existing sewer service to the project site or other surrounding uses. No significant increase in demand for wastewater disposal or treatment would be created by the project compared to current conditions. The project is not anticipated to generate significant amounts 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). Additionally, the project site is located in an urbanized and developed area. Adequate services are available to serve the project. Impacts would be less than significant.

- |   |                          |                          |                          |                                     |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
facilities, the construction of which could cause significant environmental effects?				

This project would not result in an increase in the intensity of the use and would not be required to construct a new water or wastewater treatment facility. No impact would result due to implementation of the project.

c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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See also reply to IV. c) X. d). The project will include the development of one (1) onsite bioretention basin for the capture, treatment and release of project related runoff to the adjacent perennial urban drainage ditch. The project would not exceed the capacity of the existing storm water drainage systems and therefore, would not require construction of new or expansion of existing storm water drainage facilities beyond impacts described in the BRTR from the project itself. No impact would result due to implementation of the project.

d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The 2015 City Urban Water Management Plan (UWMP) serves as the water resources planning document for the City's residents, businesses, interest groups, and public officials. The UWMP assess the current and future water supply and needs for the City. Implementation of the project would not result in new or expanded water entitlements from the water service provider, as the project is consistent with existing demand projections contained in the UWMP (which are based on the allowed land uses for the project site). The project would not require new or expanded entitlements; no impact would result.

e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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See XIX. a). The project would not result in impacts to wastewater treatment capacity by the wastewater treatment provider which serves or may serve the project. The project is in an urban environment appropriately served by existing utilities. No impact would occur.

f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Construction debris and waste would be generated from the construction of the project. All construction waste from the project site would be transported to an appropriate facility, which would have sufficient permitted capacity to accept that generated by the project. Long-term operation of the residential use is anticipated to generate typical amounts of solid waste associated with residential uses. Furthermore, the project would be required to comply with the City's Municipal Code requirement for diversion of both construction waste during the short-term, construction phase and solid waste during the long-term, operational phase. Impacts are considered to be less than significant.

- |   |                          |                          |                                     |                          |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| g) Comply with federal, state, and local statutes and regulations related to solid waste? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

The project would comply with all Federal, State, and local statutes and regulations related to solid waste. The project would not result in generation of significant solid waste, nor would it generate or require the transport of hazardous waste materials, other than minimal amounts during construction. All demolition activities would comply with any City of San Diego requirements for diversion of both construction waste during the demolition phase and solid waste during operation. Impacts would be less than significant.

XX. WILDFIRE – Would the project:

- |  |                          |                          |                                     |                          |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a) Substantially impair an adopted emergency response plan or emergency evacuation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

The 2017 San Diego County Multi-Jurisdictional Hazard Mitigation Plan (SDHMP) is the San Diego region's plan toward greater disaster resilience in accordance with section 322 of the Disaster Mitigation Act of 2000. The project would not conflict with the goals, objectives, and actions of the SDHMP. Per Action 1.D.6, High fire hazard areas shall have adequate access for emergency vehicles. The project was reviewed by the City Fire Department, and the project meets fire access requirements. Therefore, the project would not substantially impair an adopted emergency response or evacuation plan. Impacts would be less than significant.

- |  |                          |                          |                                     |                          |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of wildfire? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

The project is located in a Very High Fire Severity Zone; however, it is in an urbanized residential neighborhood and is surrounded by residential development to the north, east, and west, and SR-94 to the south. Due to the location of the project, the project would not have the potential to expose occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire. In addition, the project has been reviewed and accepted by Fire Department. Therefore, impacts would remain less than significant.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The site is in an urban residential neighborhood currently with existing infrastructure that would service the site after construction. No new construction of roads, fuel breaks, emergency water sources, power lines, or other utilities would be required that would exacerbate fire risk; therefore, impacts would be less than significant.

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Most of the project area is within developed land with limited amount of vegetated land cover. The project includes a vegetated bioretention basin that accommodates storm water runoff before it drains off site. The project would not expose people or structures to significant risk from flooding or landslide as a result of runoff, post-fire instability, or drainage changes.

#### XXI. MANDATORY FINDINGS OF SIGNIFICANCE –

a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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This analysis has determined that there are potentially significant impacts to Biological Resources. Mitigation measures included in this document would reduce these potential impacts to less than significant.

b) Does the project have impacts that are individually limited but cumulatively considerable ("cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Other future projects within the surrounding neighborhood or community would be required to comply with applicable local, State, and Federal regulations to reduce the potential impacts to less than significant, or to the extent possible. As such, the project is not anticipated to contribute potentially significant cumulative impacts.

c) Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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The project is construction of 38 units in six residential buildings in a vacant lot, and right of way vacation. The project is consistent with the environmental setting and with the use as anticipated by the City. Based on the analysis presented above, implementation of the mitigation measures would reduce environmental impacts such that no substantial adverse effects on humans would occur

## INITIAL STUDY CHECKLIST REFERENCES

### **I. Aesthetics / Neighborhood Character**

- ☒ City of San Diego General Plan
- ☒ Community Plans: Encanto Neighborhoods Community Plan

### **II. Agricultural Resources & Forest Resources**

- ☐ City of San Diego General Plan
- ☐ U.S. Department of Agriculture, Soil Survey - San Diego Area, California, Part I and II, 1973
- ☐ California Agricultural Land Evaluation and Site Assessment Model (1997)
- ☐ Site Specific Report:

### **III. Air Quality**

- ☐ California Clean Air Act Guidelines (Indirect Source Control Programs) 1990
- ☐ Regional Air Quality Strategies (RAQS) - APCD
- ☒ Site Specific Report: 32<sup>nd</sup> & Broadway, LLC – Golden Hill Project Health Risk Assessment Technical Memorandum, prepared by Ascent Environmental July 2020.

### **IV. Biology**

- ☐ City of San Diego, Multiple Species Conservation Program (MSCP), Subarea Plan, 1997
- ☐ City of San Diego, MSCP, "Vegetation Communities with Sensitive Species and Vernal Pools" Maps, 1996
- ☐ City of San Diego, MSCP, "Multiple Habitat Planning Area" maps, 1997
- ☐ Community Plan - Resource Element
- ☐ California Department of Fish and Game, California Natural Diversity Database, "State and Federally-listed Endangered, Threatened, and Rare Plants of California," January 2001
- ☐ California Department of Fish and Game, California Natural Diversity Database, "State and Federally-listed Endangered and Threatened Animals of California," January 2001
- ☐ City of San Diego Land Development Code Biology Guidelines
- ☒ Site Specific Report: Biological Resources Technical Report, 32nd & Broadway Project, prepared by Cadre Environmental, November 3, 2020

### **V. Cultural Resources (includes Historical Resources and Built Environment)**

- ☐ City of San Diego Historical Resources Guidelines
- ☐ City of San Diego Archaeology Library
- ☐ Historical Resources Board List
- ☐ Community Historical Survey:
- ☒ Site Specific Report: Phase I Cultural Resource Survey (CRS) for the 32nd & Broadway Project prepared by Brian F. Smith & Associates November 5, 2018

### **VI. Energy**

- ☒ City of San Diego Climate Action Plan
- ☒ Climate Action Plan Consistency Checklist prepared by 32nd & Broadway, LLC



**VII. Geology/Soils**

- ☐ City of San Diego Seismic Safety Study
- ☐ U.S. Department of Agriculture Soil Survey - San Diego Area, California, Part I and II, December 1973 and Part III, 1975
- ☒ Site Specific Report:  
Report Geotechnical Investigation, Proposed 32<sup>nd</sup> & Broadway Homes, Prepared by OVA Services, Inc. May 24, 2019

**VIII. Greenhouse Gas Emissions**

- ☒ Site Specific Report: Climate Action Plan Consistency Checklist prepared by 32nd & Broadway, LLC

**IX. Hazards and Hazardous Materials**

- ☐ San Diego County Hazardous Materials Environmental Assessment Listing
- ☐ San Diego County Hazardous Materials Management Division
- ☐ FAA Determination
- ☐ State Assessment and Mitigation, Unauthorized Release Listing, Public Use Authorized
- ☒ Airport Land Use Compatibility Plan
- ☒ Site Specific Report: Airport Land Use Commission Consistency Determination – Construction of 38 Attached Residential Units at 32nd Street and Broadway, City of San Diego, October 30, 2019

**X. Hydrology/Water Quality**

- ☐ Flood Insurance Rate Map (FIRM)
- ☐ Federal Emergency Management Agency (FEMA), National Flood Insurance Program-Flood Boundary and Floodway Map
- ☐ Clean Water Act Section 303(b) list, [http://www.swrcb.ca.gov/tmdl/303d\\_lists.html](http://www.swrcb.ca.gov/tmdl/303d_lists.html)
- ☒ Site Specific Report:  
Drainage Report, 32nd and Broadway, prepared by Coffey Engineering June 30, 2020.

Priority Development Project (PDP) Storm Water Quality Management Plan (SWQMP) 32<sup>nd</sup> and Broadway PTS No 637438, prepared by Coffee Engineering, June 30, 2020

**XI. Land Use and Planning**

- ☒ City of San Diego General Plan
- ☒ Encanto Neighborhoods Community Plan
- ☒ Airport Land Use Compatibility Plan
- ☒ City of San Diego Zoning Maps
- ☒ Airport Land Use Commission Consistency Determination – Construction of 38 Attached Residential Units at 32nd Street and Broadway, City of San Diego, October 30, 2019

**XII. Mineral Resources**

- ☒ California Department of Conservation - Division of Mines and Geology, Mineral Land Classification
- ☐ Division of Mines and Geology, Special Report 153 - Significant Resources Maps
- ☐ City of San Diego General Plan: Conservation Element
- ☐ Site Specific Report:

**XIII. Noise**

- ☒ City of San Diego General Plan
- ☒ Encanto Neighborhoods Community Plan
- ☒ San Diego International Airport - Lindbergh Field CNEL Maps
- ☐ Brown Field Airport Master Plan CNEL Maps
- ☐ Montgomery Field CNEL Maps
- ☐ San Diego Association of Governments - San Diego Regional Average Weekday Traffic Volumes
- ☐ San Diego Metropolitan Area Average Weekday Traffic Volume Maps, SANDAG
- ☒ Site Specific Report: Acoustical Analysis Report 32<sup>nd</sup> & Broadway prepared by Eilar Associates, Inc March 22, 2019

**XIV. Paleontological Resources**

- ☐ City of San Diego Paleontological Guidelines
- ☐ Deméré, Thomas A., and Stephen L. Walsh, "Paleontological Resources City of San Diego," Department of Paleontology San Diego Natural History Museum, 1996
- ☐ Kennedy, Michael P., and Gary L. Peterson, "Geology of the San Diego Metropolitan Area, California. Del Mar, La Jolla, Point Loma, La Mesa, Poway, and SW 1/4 Escondido 7 1/2 Minute Quadrangles," *California Division of Mines and Geology Bulletin* 200, Sacramento, 1975
- ☐ Kennedy, Michael P., and Siang S. Tan, "Geology of National City, Imperial Beach and Otay Mesa Quadrangles, Southern San Diego Metropolitan Area, California," Map Sheet 29, 1977
- ☐ Site Specific Report:

**XV. Population / Housing**

- ☒ City of San Diego General Plan
- ☒ Encanto Neighborhoods Community Plan
- ☐ Series 11/Series 12 Population Forecasts, SANDAG
- ☐ Other:

**XVI. Public Services**

- ☒ City of San Diego General Plan
- ☒ Encanto Neighborhoods Community Plan

**XVII. Recreational Resources**

- ☒ City of San Diego General Plan
- ☒ Encanto Neighborhoods Community Plan
- ☒ Department of Park and Recreation
- ☐ City of San Diego - San Diego Regional Bicycling Map
- ☐ Additional Resources:

**XVIII. Transportation / Circulation**

- ☒ City of San Diego General Plan
- ☒ Encanto Neighborhoods Community Plan
- ☐ San Diego Metropolitan Area Average Weekday Traffic Volume Maps, SANDAG
- ☐ San Diego Region Weekday Traffic Volumes, SANDAG

- ☒ Site Specific Report: Transportation Analysis Scoping for the Proposed Tentative Map located at 32nd Street and Broadway in the City of San Diego prepared by Darnell and Associates, September 2020

**XIX. Utilities**

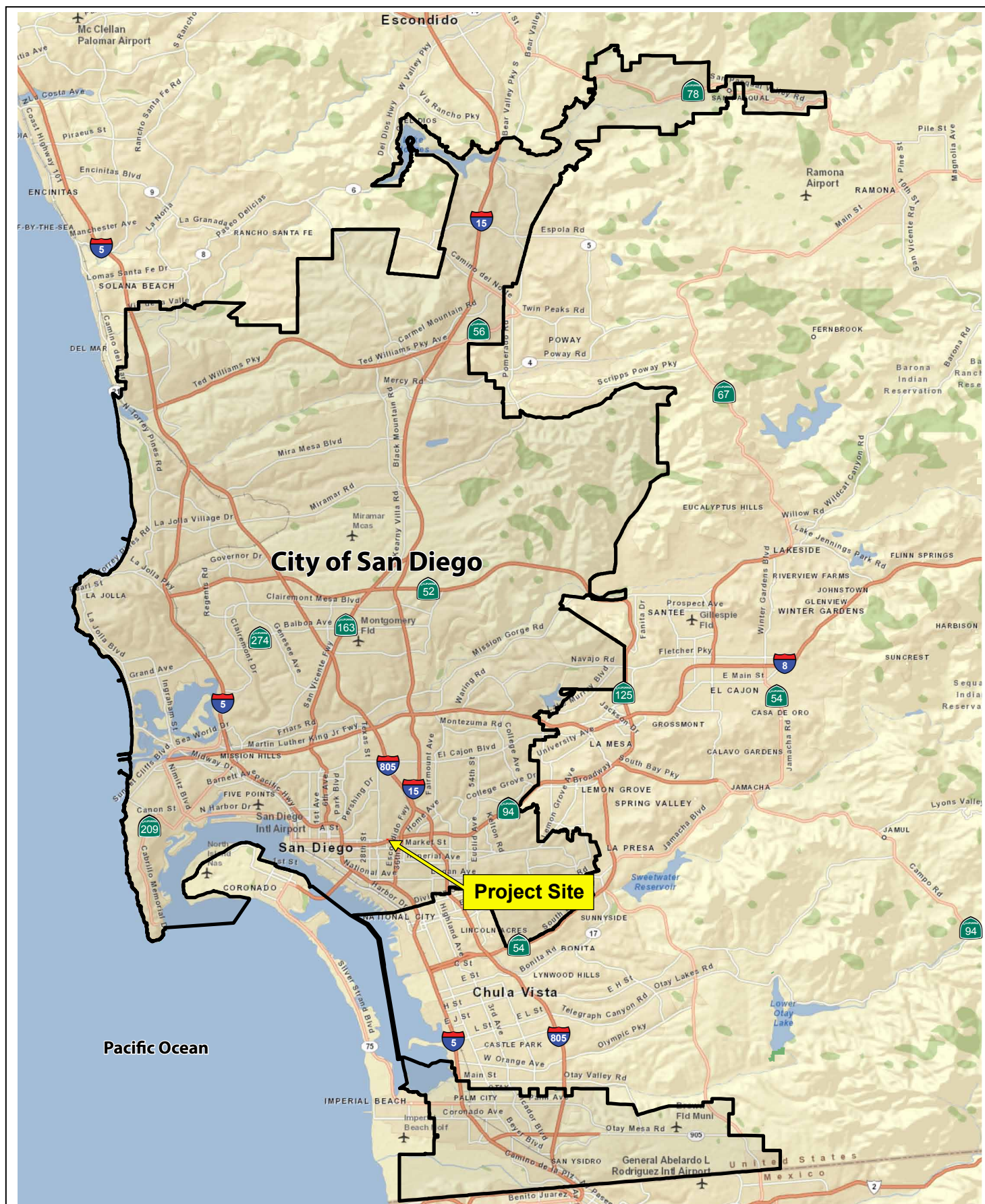
- ☒ Site Specific Report: Sewer Study, 32<sup>nd</sup> and Broadway, Prepared by Coffey Engineering December 12, 2019.

- ☐ Sunset Magazine, *New Western Garden Book*, Rev. ed. Menlo Park, CA: Sunset Magazine

**XX. Water Quality**

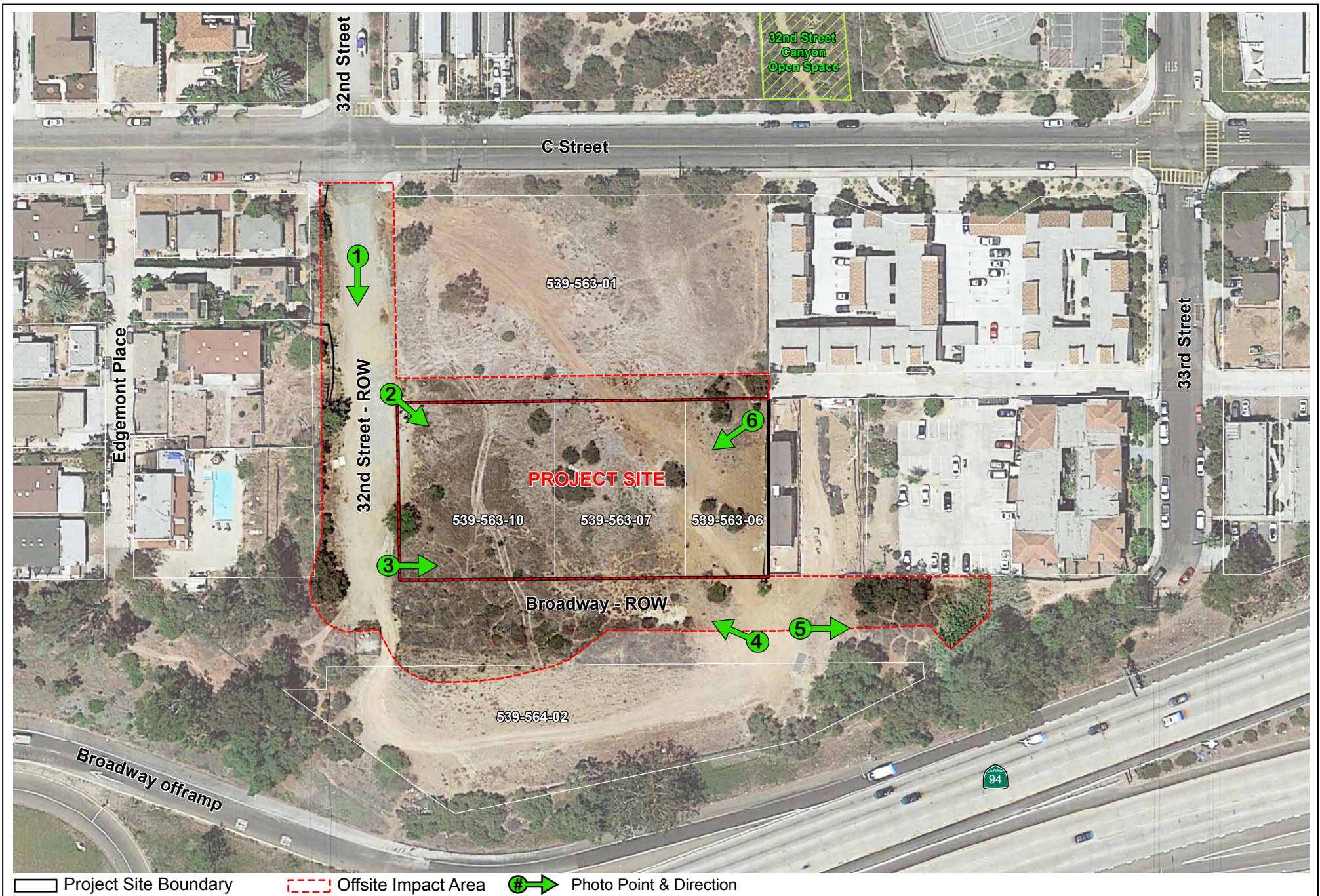
**XXI. Wildfire**

- ☒ San Diego County Multi-Jurisdictional Hazard Mitigation Plan, 2017



**Figure 1 - Regional Location Map**  
*Biological Resources Technical Report*  
*32nd & Broadway Project*





**Figure 2 - Project Site Map**

*Biological Resources Technical Report  
32nd & Broadway Project*