

ADDENDUM TO AN ENVIRONMENTAL IMPACT REPORT

THE CITY OF SAN DIEGO

Project No. 560527 Addendum to EIR No. 386029 SCH No.: 20144051075

SUBJECT: Hilltop and Euclid Mixed-Use Development: A request for a VESTING TENTATIVE MAP, NEIGHBORHOOD DEVELOPMENT PERMIT, SITE DEVELOPMENT PERMIT, and an EASEMENT VACATION to construct 20 single-family residences, 27 two-story townhome market-rate residences, 113 affordable apartment units, a parking garage and approximately 8,300 square feet of commercial space and related site improvements (i.e. hardscape, retaining walls, and landscaping). The project would request allowable deviations from applicable development regulations with respect to ground floor restrictions, building height, minimum lot area, minimum lot dimensions, setbacks, and minimum parking requirements without a 20-foot driveway. The project would conform to the Affordable/In-Fill Housing and Sustainable Buildings Expedite Program by providing onsite affordable units. The 9.38-acre vacant project site is located at the northeastern corner of Hilltop Drive and Euclid Avenue. The site is designated Residential Medium (15-29 dwelling units per acre) on the west side and Neighborhood Mixed Use Medium (30-44 dwelling units per acre) on the east side per the Encanto Neighborhoods Community Plan. The site is zoned Residential -Multiple Unit 1-2 on the west side and Commercial Neighborhood 1-4 on the east side within the Village District. The site is within the Community Plan Implementation Overlay Zone (CPIOZ Type A), Airports Influence Area (San Diego International Airport - Review Area 2), Affordable Housing Parking Demand (High), Very High Fire Hazard Severity Zone, Outdoor Lighting Zones (Lighting Zone 3 – Medium), and the Transit Priority Area. (Assessor's Parcel Numbers: 542-480-03, 09, 10, 12, 14, 16, 18, and 20.) Applicant: Affirmed Housing Group / Infill Development Company.

I. Summary of Original Project

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

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

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

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

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

II. PROJECT DESCRIPTION

A request for a VESTING TENTATIVE MAP, NEIGHBORHOOD DEVELOPMENT PERMIT, SITE DEVELOPMENT PERMIT, and an EASEMENT VACATION to construct 20 single-family residences, 27 two-story townhome residences, 113 affordable apartment units, covered parking and approximately 8,485 square feet of commercial space and related site improvements (i.e. hardscape, retaining walls, and landscaping). The site is bisected by an existing ephemeral drainage feature that conveys runoff entering the site from the north through the site to an existing discharge point at the southeast corner of the property. The ephemeral drainage feature would be landscaped. The 20 single-family residences and 27 three-story townhome residences would be market rate housing constructed on the western portion of the site, west of the ephemeral drainage feature. The single-family residences would be two-stories with a maximum height of 23'-9" at the roof peak. The single-family would construct two floor plans; Plan 1 would be 1,407 square feet (14 units) and Plan 2 would be 1,687 square feet (6 units). The townhomes would be three-stories with a maximum height of 34'-10" at the roof peak. Plan 1 will be 1,595 square feet (13 units); Plan 2 will be 1,363 square feet (14 units). A total of 40 parking spaces would be provided for the single-family residences. A total of 54 parking spaces will be provided for the townhomes. A total of 12 unassigned visitor spaces and 5 motorcycle spaces would also be provided. The market rate residences would be accessed from Hilltop Drive.

On the east side of the ephemeral drainage feature, adjacent to Euclid Avenue, a total of 113 affordable apartment units, parking, common areas and a mixed-use commercial space would be constructed within four buildings. Building A would provide approximately 8,485 square feet of ground floor mixed use space with the remaining floors (2 through 4) containing residential units. Building B1 would provide ground floor covered parking, a learning center, lobby/lounge and utility area with residential units on levels 2 through 4. Building B2 would provide ground-floor residential and commercial mixed-use parking spaces with residential amenities and bicycle storage. Residential units would be provided on levels 2 through 4. Building C would provide residential units on levels 1 through 3. Building D would be a common building used to access the swimming pool and recreation area. Buildings A, B1 and B2 would be approximately 46 feet in height from ground level to the roof. Building C would be 31 feet to the roof. Building D would be one story in height. Refer to Table 1 for the unit mix.

Table 1 Affordable Housing Unit Breakdown						
Unit Type	Unit Area	Level 1	Level 2	Level 3	Level 4	Total
Studio	456 SF	1	5	5	3	14
1-Bedroom	586 SF	2	8	8	5	23
2-Bedrooms	877 SF	2	13	13	9	37
3-Bedrooms	1,159 SF	5	7	7	2	21
4-Bedrooms	1,441 SF	2	6	6	4	18
Total		12	39	39	23	113

To accommodate residential mixed-use parking demand, the project would provide 98 standard parking spaces, 3 accessible parking spaces, one van accessible space and 12 motorcycle spaces. To accommodate mixed use commercial parking demand, the project would provide 19 standard parking spaces, one van accessible space, one van accessible electrical vehicle charging (EVCS) space, two motorcycle spaces and two short-term bicycle racks. A total of 57 secured bicycle parking spaces would be provided in the ground level of Building B2. The project would also provide 5 non-accessible EVCS parking spaces for the multifamily units and one accessible EVCS multifamily residential space.

Building D would be approximately 2,200 square feet in size and provide various indoor amenities. It would also provide access to the swimming pool, basketball court, gardening space, community room and outdoor gathering areas. A pedestrian plaza and bridge would extend over the drainage to provide a connection between the market rate residences and the affordable residences and commercial space on east side.

The Land Development Code, Section 126.0604(a), allows a project in the Affordable/In-Fill Housing and Sustainable Buildings to request deviations from applicable development regulations in accordance with a Process 4 Planned Development Permit. Deviations requested by the project include the following (and shown in Table 2):

- Ground Floor Restrictions: A deviation from SDMC Section 131.0540(c)(1) to allow residential use and residential parking within the front half of Lot 51 for Building A, measured from Hilltop Drive, where residential use and residential parking is prohibited on the ground floor in the front half of the lot;
- Building Height: A deviation from SDMC Section 131.0444(e) and Table 131-04G to allow for a 36-foot building height for a portion of Building C within and a 35-foot building height for the three-story townhomes, where the RM-1-2 zone permits a maximum height of 30 feet;
- Minimum Lot Area: A deviation from SDMC Table 131-04G to allow for a reduced minimum lot area for the single-family dwelling unit lots (2,170- through 3,431-square -foot lots) and townhome lots (987- through 1,1971-square-foot lots) where a 6,000 square foot minimum is required for each lot within the RM-1-2 zone;
- Minimum Lot Dimensions: A deviation from SDMC Table 131-04G to allow for reduced minimum lot dimensions for the single-family dwelling units and townhome lots where a minimum of a 50-foot width, 90-foot depth, and a 50-foot street frontage is required for each lot within the RM-1-2 zone;
- Setback Requirements: A deviation from SDMC Section 131.0443 (d) and Table 131-04G in Residential Zones, to allow for reduced minimum setbacks for the single-family dwelling units and townhome lots where a minimum 15 feet and 20 feet standard is required for the front setback, a minimum 5 feet and 8 feet standard is required for the side setback, and a minimum 15 feet is required for the rear setback (no alley);
- Minimum Required Parking Without a 20-foot Driveway: A deviation from SDMC Section 142.0525(d) to not require one additional parking space for the townhomes lots containing a seven-foot long driveway, measured from the back of the sidewalk to that portion of the driveway most distant from the sidewalk where the regulations require one additional parking space for each townhome since the driveways are less than 20 feet.

Table 2 Deviations Being Requested					
Required	RM-1-2	Proposed			
Ground Floor Residential	Not allowed in front 50% of lot	Proposed in front 50%			
Building Height	30' limit	36' for portion of Building C in RM-1-2 Zone; 35-foot building height for the three-story townhomes			
Lot Size	6,000 SF minimum	Single-family dwelling units (2,170- through 3,431-square -foot lots) and townhomes lots (987- through 1,1971- square-foot lots);			
Minimum Lot Dimensions	Minimum 50-foot Width, 90-foot Depth, and a 50- foot street frontage	Reduced minimum lot dimensions for the single-family dwelling units and townhomes lots			
Front Setback	20′	15-20'			
Side Setback	8′	5-8'			
Rear Setback	5′	15′			
Townhome Parking Requirements	One additional space where driveways are less than 20'	Remove requirement for one additional parking space where driveways are less than 20'			

Landscaping and Brush Management

The project would incorporate landscaping throughout the project site including street trees along the project frontage, landscaping in common areas, the parkway and street yard, and landscaping within previously disturbed slopes. Additionally, the ephemeral drainage feature would be landscaped.

The project would implement appropriate landscaping in accordance with the project's brush management zones. Brush Management Zone 1 includes the area adjacent to the structure and would consist of permanently irrigated ornamental planting. The width of Zone 1 would range from 10 to 79 feet. Zone 2 is the area between Zone 1 and the undisturbed, native or naturalized vegetation. Zone 2 vegetation would be pruned to reduce fuel loading. The width of Zone 2 would range from zero to 65 feet.

Transportation, Circulation, and Frontage Improvements

Access to the project is proposed from both Hilltop Drive and Euclid Avenue. Two separate driveways would be installed along Hilltop Drive to provide access to the market rate housing on the west side of the drainage and the affordable housing and commercial uses on the east side of the drainage. The project would also extend Hilltop Drive from its current terminus at the ephemeral drainage feature crossing east to the existing signalized intersection at Euclid Avenue. The extended segment of Hilltop Drive would match the alignment of the Hilltop Drive segment on the east side of Euclid Avenue. New curb, gutter sidewalk and related storm drain infrastructure would be installed

along the project frontage along Hilltop Drive (including the extension) and Euclid Avenue. The mixed-use element of the project (ground floor of Building A) would be accessible from the adjacent sidewalk.

Utilities

The project would discharge sewer into the existing sewer infrastructure by means of two proposed manholes in Hilltop Drive. As designed, the sewage from the western side of the proposed development will discharge into an existing 8-inch vitrified clay (VC) sewer main located in Hilltop Drive. Similarly, sewage from the east side of the project will discharge into a new manhole. The sewage would be conveyed through a new 8-inch PVC sewer main in Hilltop Drive that would connect the existing 8-inch sewer main in Hilltop Drive via a new manhole.

Potable water would be provided via existing water infrastructure. A 24-inch water main is located in Euclid Avenue which is connected to a 36-inch main in Imperial Avenue. The project would install new water laterals from Euclid Avenue and extend through the site to provide water service throughout.

With respect to storm water, the project would include two unlined underground storage vaults to provide the required flow attenuation for the majority of the site and some flows from off-site as well as infiltration for retention volumes. The two unlined vaults would be placed below a biofiltration basin which would is designed to treat pollutants. Water that is not retained for infiltration would be treated and discharge through the existing drainage via a new 48-inch culvert at the southeastern corner of the site. Off-site runoff from the north would be conveyed through the existing drainage channel as occurs under existing conditions. Modifications to the ephemeral channel to minimize erosion and related impacts during storm events be installed consistent with local, state and federal requirements.

Demolition, Grading, and Construction

Demolition would entail removing concrete slabs, foundations and related material associated with the single-family residences that were located along Euclid Avenue. The on-site graded area would be 404,594 square feet. Off-site improvements would require grading approximately 16,940 square feet. Cut and fill quantities would be approximately 35,900 cubic yards. All material would be balanced on-site. The maximum height of fill slopes would be 22 feet at a 2:1 ratio. The maximum height of the cut slopes would be 8 feet at a 2:1 ratio. Project construction is expected to take approximately 20 months to complete.

III. ENVIRONMENTAL SETTING

The 9.38-acre vacant project site is located at the northwestern corner of Hilltop Drive and Euclid Avenue site. The project site is located west of Euclid Avenue and north of Hilltop Drive. Existing site improvements consist of several concrete foundations/slabs and six driveways located along the eastern boundary adjacent to Euclid Avenue The topography of the project site is varied, consisting of a flat mesa and a ravine area that is bisected by a small unnamed drainage. The project site has been disturbed by past human activities. However, with the exception of residences constructed along Euclid Avenue, it has remained undeveloped. The residential structures were demolished between 2005 and 2009; however, foundations/slabs and remnant debris is visible along the eastern boundary adjacent to Euclid Avenue. Vegetation on- site contains a mixture of nonnative and native

vegetation with disturbed and ornamental areas containing patches of eucalyptus woodland and disturbed coastal sage scrub, non-native grassland, and an unnamed ephemeral drainage feature with a small patch of arundo.

The ephemeral drainage feature conveys urban runoff and seasonal flows. Based on a review of historic aerial photographs, the drainage was altered between 1953 and 1964. During this time period, a portion of drainage was filled to provide access across the drainage at the southeastern corner of the site adjacent at the eastern terminus of Hilltop Drive. To convey water under the filled area, a concrete pipe was placed in the drainage corridor. Over time, scour has exposed a large section of pipe on the north side of the fill area.

The project site is bordered immediately by Euclid Avenue and commercial and residential uses to the east, residential uses to the west, commercial uses to the north, and by both Hilltop Drive (as well as a portion that is a paper street) and residential uses to the south. Additionally, the project site is situated in an area currently served by existing public services and utilities.

The site is designated Residential Medium (15 – 29 dwelling units per acre) on the west side and Neighborhood Mixed Use Medium (30 – 44 dwelling units per acre) on the east side per the Encanto Neighborhoods Community Plan and zoned Residential -Multiple Unit 1-2 (RM-1-2) on the west side and Commercial Neighborhood 1-4 (CN-1-4) on the east side within the Village District. Additionally, the site is within the Community Plan Implementation Overlay Zone (CPIOZ Type A), Airports Influence Area (San Diego International Airport – Review Area 2), Affordable Housing Parking Demand (High), Very High Fire Hazard Severity Zone, Outdoor Lighting Zones (Lighting Zone 3 – Medium), and the Transit Priority Area.

IV. ENVIRONMENTAL DETERMINATION

The City previously prepared and certified the SESD and Encanto Neighborhoods Community Plan Update Program Environmental Impact Report (PEIR) (No. 386029/SCH No. 20144051075) per Resolution No. R-310077 on December 2, 2015. Based on all available information and in light of the entire record, the analysis in this EIR Addendum, and pursuant to Section 15762 and 15764 of the State CEQA Guidelines the City has determined the following:

- There are no substantial changes proposed in the project which will require major revisions of the previous environmental document due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
- Substantial changes have not occurred with respect to the circumstances under which the project is undertaken which will require major revisions of the previous environmental document due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- There is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous environmental document was certified as complete or was adopted, shows any of the following:

- a. The project will have one or more significant effects not discussed in the previous environmental document;
- b. Significant effects previously examined will be substantially more severe than shown in the previous environmental document;
- c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
- d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous environmental document would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

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

V. IMPACT ANALYSIS

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

The SESD and Encanto Neighborhoods CPU Project Program EIR identified significant unmitigable impacts relative to Transportation/Circulation, Air Quality, and Noise.

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

An overview of the Hilltop and Euclid Mixed-Use Development (Hilltop and Euclid) project impacts in relation to the previously certified Program EIR is provided in Table 3, Impact Assessment Summary.

Table 3 Impact Assessment Summary				
Environmental Issues	2015 PEIR Finding	Project	New Mitigation?	Project Resultant Impact
Land Use	Significant, but mitigated	No new impacts	No	Less than significant
Transportation	Significant unavoidable	No new impacts	No	Less than significant
Air Quality	Significant unavoidable	No new impacts	No	Less than significant
Noise	Significant unavoidable	No new impacts	No	Significant, but mitigated with project specific mitigation
Biological Resources	Less than significant with mitigation	No new impacts	No	Significant, but mitigated with project specific mitigation
Hydrology and Water Quality	Less than significant with mitigation	No new impacts	No	Less than significant
Historical Resources	Less than significant with mitigation	No new impacts	No	No Impact
Paleontological Resources	Less than significant with mitigation	No new impacts	No	Significant, but mitigated with project specific mitigation
Geologic and Seismic Hazards	Less than significant with mitigation	No new impacts	No	Less than significant
Hazards and Hazardous Materials	Less than significant	No new impacts	No	Less than significant
Greenhouse Gas Emissions	Less than significant	No new impacts	No	Less than significant
Energy	Less than significant	No new impacts	No	Less than significant
Public Services and Facilities	Less than significant	No new impacts	No	Less than significant
Public Utilities	Less than significant	No new impacts	No	Less than significant
Visual Effects and Neighborhood Character	Less than significant	No new impacts	No	Less than significant

Land Use

2015 PEIR

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

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

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

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

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

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

Project

The project site is designated Residential Medium (15 – 29 dwelling units per acre) on the west side and Neighborhood Mixed Use Medium (30 – 44 dwelling units per acre) on the east side per the Encanto Neighborhoods Community Plan and zoned RM-1-2 on the west side and CN-1-4 on the east side within the Village District. The underlying base zone, CN-1-4, allows multifamily and commercial services. The RM 1-2 designation allows for single- and multifamily residences, restaurant and related uses that would support neighboring residences. The project contains singlefamily, multifamily and commercial elements consistent with the corresponding zoning and land use designations. The project is consistent with the land use designations provided in the Encanto Community Plan Update area as well as with the underlying zone. Although the site is within an urbanized area and contains some site improvements, such as concrete slabs and six driveways, the majority of the site contains a mixture of nonnative and native vegetation with disturbed and ornamental areas containing patches of eucalyptus woodland and disturbed coastal sage scrub, non-native grassland, and an unnamed ephemeral drainage feature with a small patch of arundo. The project would be consistent with the requirements of the Environmentally Sensitive Regulations as well as the Biology Guidelines. The project would not conflict with any applicable habitat conservation plan or natural community conservation plan. The project would not conflict with the City's Multiple Species Conservation Plan (MSCP), in that the site is not located within or adjacent to the Multi-Habitat Planning Area (MHPA). No significant impacts would occur, and no mitigation measures are required. The project would not conflict with the Historical Resources Guidelines or applicable regulations.

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

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

Transportation/Circulation and Parking

2015 PEIR

The Program EIR concluded that implementation of the CPU would result in significant and unavoidable impacts to street segments and freeways serving the community. These impacts were related to an increase in traffic which would be substantial in relation to existing traffic volumes and capacity of the streets and freeways. Mitigation measures, including potential street and intersection improvements (e.g., widening, restriping, and roadway diet), were identified. To address project specific impacts, all discretionary projects would be reviewed as part of the Community Plan Implementation Overlay Zone (CPIOZ) process to determine what traffic impacts would occur and identify project-specific mitigation measures.

The Program EIR concluded that implementation of the CPU would result in less than significant impacts caused by substantial alterations to present circulation movements including effects on existing public access areas. The Program EIR concluded that implementation of the CPU would result in less than significant impacts with respect to adopted policies, plans, or programs supporting alternative transportation modes.

Project

Consistent with the Program EIR Mitigation Framework, a Transportation Impact Analysis (TIA) was completed (Chen Ryan, August 2018) to identify project-specific impacts and determine appropriate project-specific mitigation measures that would be implemented to reduce impacts to below a level of significance. The findings are summarized below. Proposed development densities on the site are lower than what was envisioned in the Community Plan Update; however, the proposed project is expected to generate approximately 2,040 daily trips. The proposed project is estimated to generate approximately 2,040 daily trips with 166 (60-in:106-out) trips during the AM peak hour and 180 (117-in:63-out) trips during the PM peak hour. The addition of project traffic would cause or contribute to the following significant impacts:

Significant Direct Impact - Existing Plus Project

Roadway Segments: Based upon the significance criteria presented in Section 2.5 of the TIA, the addition of project traffic would have a significant impact on Market Street, between Euclid Avenue and 54th Street. However, the roadway is already constructed to its ultimate classification per the Encanto Neighborhoods Community Plan and this impact determination is consistent with the CPU Program EIR and the improvement measures are not recommended due to inconsistency with the mobility vision, goals, and policies of the CPU to limit modifications within existing rights of way and to avoid extensive road widening. Thus, no mitigation would be required.

Intersections:

- Euclid Avenue & SR-94 WB Ramps LOS F during both the AM and PM peak hours; and
- Euclid Avenue & SR-94 EB Ramps LOS E during AM peak hour and LOS F during PM peak hour.

Ramp Metering: No significant impact.

Significant Direct Impact - Near-Term Plus Project (Opening Day 2020)

Roadways: The addition of project traffic would significantly impact Market Street, between Euclid Avenue and 54th Street. However, the roadway is already constructed to its ultimate classification per the CPU Program EIR and this impact determination is consistent with the CPU Program EIR. Thus, mitigation would not be required.

Intersections: No significant impact.

The SR-94 Interchange project is (City CIP No. S-14009) is assumed to be fully implemented under this scenario.

Ramp Metering: No significant impact.

Significant Cumulative Impact - Horizon Year 2035 Plus Project

Roadway Segments: The addition of project traffic would significantly impact Market Street between Euclid Avenue and 54th Street. However, the roadway is already constructed to its ultimate

classification per the CPU Program EIR, and this impact determination is consistent with the CPU Program EIR and the improvement measures are not recommended due to inconsistency with the mobility vision, goals, and policies of the CPU to limit modifications within existing rights of way and to avoid extensive road widening. Thus, mitigation would not be required.

Intersections: No significant impact.

The SR-94 Interchange project (City CIP #S-14009) is assumed to be fully implemented under this scenario.

Ramp Metering: No significant impact.

Mitigation Measures

The following mitigation measures would be required to mitigate project-specific impacts.

Existing Plus Project

Roadway Segments: The addition of project traffic would significantly impact Market Street between Euclid Avenue and 54th Street. However, the roadway is constructed to its ultimate classification per the SESD and Encanto Neighborhoods Community Plans. Thus, improvement measures are not recommended as this would be inconsistent with the mobility vision, goals and polices of the CPUs to limit modifications within existing right-of-way and to avoid extensive widening. Thus, no mitigation would be required.

Intersections:

- Euclid Avenue & SR-94 WB Ramps
 - o Signalize this intersection
 - o Convert the existing westbound free right-turn lane into a permissive right-turn lane
 - o Convert the existing northbound free right turn lane into a permissive right-turn lane
- Euclid Avenue & SR-94 EB Ramps
 - o Signalize this intersection
 - o Remove the existing eastbound free right-turn lane
 - Convert the existing westbound free right-turn lane into a westbound permissive left-turn lane
 - o Construct a dual westbound left-turn lane

The SR-94 ramp improvements referenced above are consistent with those proposed by the SR-94 Interchange project. The SR-94 Interchange project is fully funded and construction began in May 2018. Construction is expected to be completed by June 2019. Because completion of the SR-94 project would address the above impacts by improving all locations to LOS D or better, no mitigation would be required of the project.

Ramp Metering: No significant impacts were identified; therefore, no mitigation measure required.

Significant Direct Impact - Near-Term Plus Project (Opening Day - Late 2020)

Roadways: The addition of project traffic would significantly impact Market Street between Euclid Avenue and 54th Street. However, the roadway is constructed to its ultimate classification per the SESD and Encanto Neighborhoods Community Plans. The impact is consistent with the determination in the CPU Program EIR. No mitigation would be required.

Intersections: No significant impacts were identified; therefore, no mitigation measure are required.

Ramp Metering: No significant impacts were identified; therefore, no mitigation measure are required.

Significant Cumulative Impact - Horizon Year 2035 Plus Project

Roadway Segments: The addition of project traffic would significantly impact Market Street between Euclid Avenue and 54th Street. However, the roadway is constructed to its ultimate classification per the SESD and Encanto Neighborhoods Community Plans. The impact is consistent with the determination in the CPU Program EIR. No mitigation would be required

Intersections: No significant impacts were identified; therefore, no mitigation is required.

Ramp Metering: No significant impacts were identified; therefore, no mitigation is required.

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

Air Quality

2015 PEIR

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

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

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

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

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

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

Project

A project-specific Air Quality Report was prepared by Birdseye Planning Group (November 2017) to assess the potential air quality impacts associated with the project consistent with the Program EIR Mitigation Framework. The technical report evaluated existing conditions of the project vicinity, potential impacts associates with project construction and an evaluation of project operational impacts. The following is a summary of the report. (November 2017).

Consistency with the RAQS and SIP. The project would be consistent with the General Plan, community plan, and the underlying zoning designations. Therefore, the project would be consistent at a sub-regional level with the underlying growth forecasts in the RAQS and would not obstruct implementation of the RAQS. Thus, no impacts would result.

Short-Term (Construction) Emissions. The analysis took into consideration that the project would comply with San Diego Pollution Control District Rules 52, 54, and 67 which identity measures to reduce fugitive dust as well as use of low VOC paint, and required measures to be implemented at all construction site located within the San Diego Air Basin. The technical study identified that emissions of criterial pollutants during construction would be below the thresholds of significance for all construction phases for all pollutants. Project criteria pollutant emissions during construction would be temporary and are less than significant. Construction operations would include standard measures as required by City of San Diego grading permit to limit potential air quality impacts. Therefore, impacts associated with fugitive dust are considered less than significant and would not violate an air quality standard or contribute substantially to an existing or projected air quality violation. Mitigation measures would not be required.

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

Objectionable Odors – Short-term (Construction). Odors would be generated from vehicles and/or equipment exhaust emissions during construction of the project. Odors produced during construction would be attributable to concentrations of unburned hydrocarbons from tailpipes of construction equipment and architectural coatings. Such odors are temporary and generally occur at magnitudes that would not affect a substantial number of people. Therefore, impacts would be less than significant.

Objectionable Odors – Long-term (Operational). Typical long-term operational characteristics of the project are not associated with the creation of such odors nor anticipated to generate odors affecting a substantial number of people. The project would construct a 47 single-family and townhomes as well as 113 multi-family residential units. Such development, in the long-term operation, is not typically associated with the creation of such odors nor anticipated to generate odors affecting a substantial number or people. Therefore, project operations would result in less than significant impacts.

CO Hot Spots. Projects involving traffic impacts may result in the formation of locally high concentrations of carbon monoxide (CO), known as CO "hot spots." The technical study included an evaluation to verify whether the project would cause or contribute to a violation of the CO standard. Project-related traffic would have the potential to result in CO "hot spots" if project-related traffic resulted in a degradation in the level of service at any intersection to LOS E or F. The Transportation Impact Analysis (Chen Ryan August 2018) evaluated whether there would be a decrease in the level of service at the intersections affected by the project.

The Transportation Impact Analysis included eight intersections in the study area. Based on the results of the Transportation Impact Analysis, the project would result in a delay and/or degradation in LOS to LOS E or F at two intersections:

- Euclid Avenue & SR94 WB Ramps; and
- Euclid Avenue & SE94 EB Ramps

Mitigation measures were identified consistent with those proposed by the SR-94 Interchange Project, currently under construction and anticipated to be completed by June 2019. With implementation of the mitigation measures, would improve intersection operations and thereby reduce impacts. Therefore, the project's impacts to traffic would be less than significant, and no CO hot spots would result. Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the Program EIR. The project would not result in any new significant impact, nor would a substantial increase in the severity of impacts from that described in the Program EIR result.

Noise

2015 PEIR

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

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

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

Project

A project-specific noise report was prepared by dBF Associates, Inc. (October 26, 2017) as required by the Program EIR Mitigation Framework. The technical study analyzed the existing and future noise environments. The technical report is summarized below.

The primary noise sources in the vicinity of the project site is vehicular traffic on adjacent and nearby roadways from State Route (SR) 94, Euclid Avenue, and Hilltop Drive. The site is also exposed to aircraft noise levels less than 60 dBA CNEL from operations associated with the San Diego International Airport (SDIA).

Construction Noise (Short-Term): Temporary noise impacts would be associated with on-site grading, use of concrete mixers, and delivery of materials. The technical report determined that construction noise impacts to surrounding properties at the closest residences are expected to comply with the applicable City of San Diego construction noise limits. Impacts would be less than significant.

Outdoor Exterior Noise. The project includes several outdoor usable areas comprised of a community swimming pool, basketball court, gardening space, community room and outdoor gathering areas on the west side of the western apartment building. Based on the analysis, future exterior noise levels would be 65 dBA CNEL or below. Therefore, impacts to outdoor usable areas would be less than significant.

Interior Noise. Future exterior noise levels would exceed 60 dBA CNEL at some residential building façades; thus, interior noise levels in habitable rooms would exceed the City's General Plan Noise Compatibility Guidelines requirement of 45 dBA CNEL for residential uses. Future exterior noise levels would exceed 65 dBA CNEL at some commercial building façades; thus, interior noise levels would exceed the City's General Plan Noise Compatibility Guidelines requirement of 50 dBA CNEL for commercial uses.

Therefore, an exterior to interior acoustical report would be required, consistent with the Program EIR Mitigation Framework (Mitigation No. MM-NOS-2) to identify appropriate mitigation measures to ensure that a 45 dBA CNEL interior noise level for residential uses and a 50 dBA CNEL / Leq noise level for commercial uses is achieved. Therefore, impacts would be reduced to below a level of significance.

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

Operational / Stationary Noise. Project-generated traffic would increase existing noise levels by less than 1 dBA CNEL at off-site land uses along project access roadways. The impact of project-generated traffic noise would be less than significant. The project would produce noise levels of less than 50 dBA Leq at residential uses and less than 55 dBA Leq at commercial uses; and thus, would comply with City of San Diego Municipal Code noise limits. Refuse vehicles or parking lot sweepers would operate on the project site between 7:00 a.m. and 7:00 p.m. The impact of project-generated operational noise would be less than significant.

As referenced previously, the project site is within the Airport Influence Area (San Diego International Airport, Area 2). However, the site is not located within the airport 60 dBA CNEL noise contours depicted in the Airport Land Use Compatibility (ALUCP). Therefore, the project is consistent with the ALUCP.

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

Biological Resources

2015 PEIR

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

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

Future development of the project has the potential to impact active nests of migratory bird species; however, the canyons and water courses on and in proximity to project site are not anticipated to function as significant regional or local wildlife movement corridors for large mammals. In addition, many of the canyon areas and water courses are included in the adopted MHPA and existing conserved land, and open space and would continue to be preserved regardless of the project.

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

Project

A field survey and a biological technical report was prepared by Rincon Consultants, Inc. (July 2018) in order to assess the vegetation communities on site and determine what impacts would result through project implementation. Although the site is within the boundaries of the City of San Diego Multiple Species Conservation Plan (MSCP) Subarea, no Multi-Habitat Planning Area (MHPA) is mapped either adjacent or onsite. Site reconnaissance surveys were initiated in 2016 that included vegetation mapping of the entire property as well as updated vegetation mapping in 2018.

Approximately 9.35 acres of sensitive habitat and land cover were identified in the study area that include the following: disturbed coastal sage scrub (0.30-acre, Tier II), non-native grassland (0.62-acre, Tier IIIB); eucalyptus woodland (2,29 acres, Tier IV); disturbed habitat (5.07 acres, Tier IV), urban developed land (1.14 acre, Tier IV), and an ephemeral drainage (0.59 acre). Special status plant species were not observed and therefore are not likely to occur on site.

A Cooper's Hawk was seen nesting on the site and no other wildlife species were observed due to the disturbed nature of the site, its location within a developed urban neighborhood, and because the site is isolated from larger biological linkages. The project would not result in impacts to special-status plant or wildlife species. The project would be required to comply with state and federal regulations as it relates to migratory birds.

Wildlife movement corridors are defined as areas that connect suitable wildlife habitat areas in a region otherwise fragmented by rugged terrain, changes in vegetation, or human disturbance. Natural features such as canyon drainages, ridgelines, or areas with vegetation cover provide corridors for wildlife travel. As previously mentioned the site is constrained by urban development and the sensitive habitat that exist onsite does not contribute nor does it function as any local or regional wildlife corridor or as a linkage.

As a result of project implementation, impacts would occur to sensitive coastal sage scrub (Tier II, 0.30 acre), non-native grassland (Tier IIIB, 0.62 acre), eucalyptus woodland (Tier IV, 2.09 acres), and disturbed habitat (Tier IV, 5.07 acres). All impacts would occur outside of the MHPA. According to the City of San Diego Biology Guidelines, impacts to Tiers II (uncommon uplands) and IIIB (common uplands) habitats would be considered significant and require to be mitigated either in or outside of the MHPA. If mitigated in the MHPA the ratio required would be 1:1; if mitigated outside of the MHPA the ratio required would be 1.5:1. Impacts to Tier IIIB (common uplands) would be considered significant and require to be mitigated of the MHPA. If mitigated within the MHPA the ratio would be 0.5:1 and if mitigated outside of the MHPA. If mitigated habitat and require to Tier IV (eucalyptus woodland and disturbed habitat) would not be considered significant and therefore mitigation would not be required

Mitigation for direct impacts to 0.92 acre of sensitive upland habitat would be achieved through payment into the City's Habitat Acquisition Fund Conversely, impacts to eucalyptus woodland and urban/developed are not considered significant and not require mitigation.

Wetlands are considered sensitive and regulated by local, state, and federal agencies and the direct impacts to these jurisdictional areas are considered significant. The site does not contain any City jurisdictional wetlands and therefore no impact would occur. Approximately 0.52-acre of non-jurisdictional Water of the U.S. occur on site and consist of an unnamed ephemeral drainage.

Consequently, the project would result in impacts to the non-wetland waters (unnamed ephemeral drainage) that are under the jurisdiction of USACE, CDFW, and RWQCB according to Section 404 of the Clean Water Act and Section 1600 of the California Department of Fish and Game Code. As previously identified, these non-wetland waters are not considered jurisdictional by the City. Mitigation would be provided in accordance with resource agency permit requirements.

A Mitigation Monitoring Reporting Program (MMRP), as detailed in Section V of the Mitigated Negative Declaration would be implemented. With implementation of the MMRP, potential biological resources impacts would be reduced to below a level of significance.

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

Hydrology and Water Quality

2015 PEIR

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

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

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

Project

Drainage. A site-specific preliminary drainage study was prepared (Project Design Consultants November 2018) that evaluated the existing and proposed drainage patterns. In the post project condition, impervious surfaces on the project site would increase thereby resulting in a slight increase to flow rate when compared to the existing condition. The entrance of existing channel near the north property line was analyzed to determine if slope protection or velocity dissipators would be required. The results indicate that the cross section where the recontoured channel narrows from existing conditions, the velocity increases by 0.9 feet per second (feet/second) from 4.5 feet/second to 5.4 feet/second. Rip-rap will be placed on the embankment slopes to protect and stabilize as the channel narrows through the site. At the downstream point of discharge, embankment stabilization and installation of a proposed 48-inch culvert would cause little change in water velocities with the project. The increase would be from 6.69 feet/second under existing conditions to 6.71 feet/second post-construction. The 48-inch culvert would have sufficient capacity to convey volumes under a 100-year storm event which would be an improvement over the existing condition. Post construction, water would continue to discharge to the downstream channel at the

south side of the extension of Hilltop Drive through a public storm drain culvert that will be upgraded to convey runoff from this point. Off-site runoff from two curb cuts at cul-de-sacs at Carolina Place and Lace Place will be collected in a brow ditch and piped into the proposed private drainage system. Substantial alterations to the existing drainage patterns are not proposed. As referenced, the project design would increase impervious surfaces. Peak flow rates would increase negligibly post-construction.

Water Quality. According to the City's Storm Water Requirements Applicability Checklist, the project is considered to be a Priority Development Project; and therefore, prepared a Storm Water Quality Management Plan (SWQMP) (Project Design Consultant's, January 2018), Preliminary Hydromodification Management Study (Project Design Consultants, January 2018), and a Hydromodification Screening (Chang, 2017) to identify and implement required structural best management practices (BMP) for storm water pollutant control (BMP Design Manual Chapter 5, Part 1 of Storm Water Standards) as well as low impact development source control BMPs.

With respect to storm water management, the project will include two unlined underground storage vaults to provide the required flow attenuation for the majority of the site and some flows from offsite as well as infiltration for retention volumes. One lined storage vault will be implemented for a small portion of the site where infiltration is infeasible. The two unlined vaults will be placed below a biofiltration basin which would is designed to treat pollutants. BMPs would include maintaining existing drainage pathways, conserving natural areas, soils and vegetation; minimizing impervious areas and soil compaction and landscaping with drought tolerant species.

These requirements have been reviewed by qualified City staff and would be re-verified during the ministerial process. Adherence to applicable water quality standards would ensure adverse impacts associated with compliance with quality standards are avoided. Impacts would be a less than significant.

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

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

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

Historical Resources (archaeological and cultural)

2015 PEIR

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

Project

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

As part of the CPU effort the entire Encanto planning area was identified as having a moderate to high prehistoric resource potential. More specifically, the project site is mapped as having a moderate potential. Since the site is undeveloped and located within an area identified as shaving a moderate sensitivity level, qualified City staff conducted a record searches of the California Historic Resources Information System (CHRIS) digital database. The search identified several previously recorded historic and prehistoric sites in the project vicinity. Based on the information, there is a potential for buried cultural resources to be impacted through project implementation. Therefore, consistent with the CPU mitigation framework an archaeological survey and report was prepared by Birdseye Planning Group (August 2017), that included literature review, record searches, Native American Consultation, and completion of a pedestrian field survey (May 16, 2017) of the entire project site, per the City's requirements.

As part of the cultural resources identification process, outreach to the Native American Heritage Commission (NAHC) to request a review of the Sacred Lands File (SLF) was also conducted. The SLF search results received on June 16, 2017, failed to identify Native American cultural resources within the project site. Additionally, the NAHC provided a contact list of 20 Native American individuals or tribal organizations that may have knowledge of cultural resources in or near the project site. On June 19 and 20, correspondence letters were sent to the local Native American contacts provided by the NAHC requesting information regarding cultural resources in the vicinity of the project. The Kwaaymii Laguna Band of Mission Indians responded, that should archaeological monitoring be recommended for the project, that a Native American monitor be present as well. The results and conclusions of the technical report are summarized below.

Information retrieved as part of the literature review and record searches revealed four recorded archaeological sites within a half-mile radius of the project site, though none are recorded within the sites APE. The site does not historic sites currently exist. Eight residential structures originally constructed prior to 1953 existed along the eastern perimeter fronting Euclid Avenue. These properties were evaluated for historicity and determined to not be significant as part of the Fifth Amendment of the Central Imperial Redevelopment Project Environmental Impact Report. The structures were demolished between 2005 and 2009 and all that remains are concrete slabs, foundations and driveways.

The site was surveyed on May 16, 2017 and a few historic period artifacts associated within a large predominately modern refuse scatter connected with the previous residential structures. The refuse scatter appears to have been placed into and down the eastern bank of the drainage channel as fill. The refuse scatter is in a secondary context and considered disturbed, therefore it lacks the potential to provide significant data. The field survey did not identify additional resources; consequently, due to the partially disturbed nature of the site as well as lack of any prehistoric or historic component, no further evaluation would be required therefore not necessitating mitigation.

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

Paleontological Resources

2015 PEIR

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

Project

According to the Preliminary Geotechnical Investigation prepared by NOVA Services, Inc. (July 19, 2017), the site is underlain by the artificial fill and Very Old Paralic Deposit (formally known as Baypoint Formation). The artificial fill has a zero-sensitivity rating, whereas Very Old Paralic Deposit has a high sensitivity rating for paleontological resources.

The project would involve approximately 35,900 cubic yards of cut and would excavate to a maximum depth of seven feet. Considering the high paleontological sensitivity rating of the underlying geologic formation encountered at a depth of two feet in borings conducted during the geotechnical investigation, the project grading activities have potential to disturb or destroy paleontological resources. Disturbance or loss of fossils would be considered a significant environmental impact. Therefore, a Mitigation Monitoring Reporting Program (MMRP), as detailed within Section VI of the Addendum, would be implemented. With implementation of the monitoring program, potential impacts on paleontological resources would be reduced to less than significant.

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

Geology and Seismic Hazards

2015 PEIR

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

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

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

Project

A site-specific preliminary geotechnical report (NOVA, July 19, 2017), Design Phase Infiltration Assessment (September 16, 2018), Addendum Report and Response to City Review Comments (November 22, 2018) were prepared for the site as required by the 2015 Program EIR. Based on the results of the investigation, the geotechnical consultant has adequately addressed the soil and geologic conditions potentially affecting the site; and therefore, it was concluded that the planned construction would be feasible from a geotechnical standpoint. Additionally, the project would be required to comply with the California Building Code that would reduce impacts to people or structures to an acceptable level of risk. Implementation of proper engineering design and utilization of standard construction practices, to be verified at the building permit stage, would ensure that the potential for impacts from regional geologic hazards would remain less than significant.

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

Health and Safety/Hazardous Materials

2015 PEIR

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

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

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

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

Project

The potential for impacts related to hazards and hazardous materials was evaluated in the Hilltop/Euclid Mixed Use Development Phase I Environmental Site Assessment prepared by Rincon Consultants, Inc. (June 2014).

There are no documented hazardous material release cases on the project site. The project site is not located within a fire hazard zone. Project design incorporated required elements of the City's Brush Management Regulations and Landscape Standards pursuant to Land Development Code.

The project would not physically interfere with the San Diego County Operational Area Emergency Plan as street improvements would accommodate emergency vehicle access and evacuation. The project site is located within 0.25 mile of existing schools (0.05 mile east of Millennial Tech Middle School, 0.15 mile east of Gompers Preparatory Academy, and 0.15 mile north of Horton Elementary School). However, no hazards or hazardous materials are associated with the project; thus, no impacts greater than what were disclosed in the PEIR would occur.

Development of the project site would be subject to airspace protection and overflight policies and standards; and thus, would not result in any new or more severe impacts related to airport safety hazards.

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

Greenhouse Gas Emissions

2015 PEIR

Greenhouse Gas Emission are discussed in Section 5.11 of the 2015 Program EIR, which concluded impacts resulting from buildout of the CPUs would be less than significant The SESD and Encanto Neighborhoods CPUs would achieve an approximate 42 and 40 percent reduction in GHG emissions relative to Business as Usual (BAU), respectively, which would exceed the 28,3 percent required for consistency with the CARB Scoping Plan. Additionally, the CPUs include land use, sustainability, and mobility policies that are intended to reduce vehicle miles traveled and increase transit as well as other modes of transportation. Further, the Program EIR concluded that the CPUs would not conflict with a plan, policy, or regulation adopted for the purpose of reducing the GHG emissions. Therefore, a mitigation framework was not required.

Project

In the time following the certification of the CPUs Program EIR, the City adopted a Climate Action Plan (CAP) in December 2015 that outlines the actions the City will undertake to achieve its proportional share of State GHG emission reductions. The City has identified the following five CAP strategies to reduce GHG: energy and water efficient buildings; clean and renewable energy; bicycling, walking, transit, and land use; zero waste (gas and waste management); and climate resiliency. In order to ensure that future developments comply with the CAP, the City adopted a CAP Consistency Checklist, adopted July 12, 2016, which is the primary document used by the City to ensure a project-by-project consistency with the underlying assumptions in the CAP and thereby to ensure the City will achieve the emission reduction targets identified in its CAP.

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

CAP Consistency Checklist. The CAP Consistency Checklist includes a three-step process to determine project if the project would result in a GHG impact. Step 1 consists of an evaluation to determine the project's consistency with existing General Plan, Community Plan, and zoning designations for the site. Step 2 consists of an evaluation of the project's design features compliance with the CAP strategies. Step 3 is only applicable if a project is not consistent with the land use

and/or zone, but is also in a transit priority area to allow for more intensive development than assumed in the CAP.

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

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

Energy Conservation

2015 PEIR

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

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

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

Project

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

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

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

Public Services and Facilities

2015 PEIR

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

The Program EIR, Section 5.13, concluded that implementation of the Community Plan would increase the demand for public services and facilities as a result of population growth. The CPU estimated that improvements associated with plan implementation could generate an increase in residents within the Encanto Community. Police and fire protection would be required to meet standards identified in the General Plan and further supported by policies in the CPUs. Additionally, future development projects would be required to pair development impacts fees accordingly, that would contribute towards maintenance and construction of facilities and services. The 2015 Program EIR, which determined that a mitigation framework was not necessary as impacts were determined to be less than significant.

Project

The project would be consistent with the General Plan, Community Plan and zoning. Development of the project would not adversely affect existing levels of such services to the area and would not require the construction of new or expansion of existing governmental facilities. No impacts would occur, and no mitigation measures are required. Further, the project would be required to pay impact fees to provide funds needed to address any deficiencies in police, fire, parks, schools, libraries and other public services. Based on the foregoing analysis and information, there is no evidence that the project requires a major change to the Program EIR. The project would not create any new significant impact, nor would a substantial increase in the severity of impacts from that described in the Program EIR result.

Public Utilities

2015 PEIR

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

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

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

Project

Sewer capacity was evaluated in a *Sanitary Sewer Study for Hilltop and Euclid Project* prepared by Project Design Consultants, Inc. (January 2018). The combined sewage flows from all project components were calculated to be 0.21 cubic feet/second. Sewage from the project would convey to an existing 8-inch sewer main located in Hilltop Drive. The existing sewer has sufficient capacity to convey project flows.

Potable water would be provided via existing water infrastructure. A 24-inch water main is located in Euclid Avenue which is connected to a 36-inch main in Imperial Avenue. The Euclid Avenue water main is one source of potable water in the CPU area. The distribution piping in the Encanto area is comprised of 6" through 12" pipelines which are interconnected. No water supply study was required as sufficient capacity exists to serve the project.

All storm water runoff from the SESD and Encanto Neighborhoods communities drains into one of four creeks: Chollas Creek, Switzer Creek, Paleta Creek, and Paradise Creek. As discussed, flows from the project site would be collected and treated on-site. Water that is not retained for infiltration would discharge through a new 48-inch culvert at the southeastern corner of the site.

With respect to solid waste, a Waste Management Plan (WMP) was prepared for the project by Birdseye Planning Group (November 2017). As stated in the WMP, construction activities would generate packaging materials and unpainted wood, including wood pallets, and other miscellaneous debris. Construction debris would be separated on-site into material-specific containers to facilitate reuse and recycling and to increase the efficiency of waste reclamation and/or would be collected by a contracted waste hauler and separated at a handling facility. Residents and commercial tenants will be provided storage containers for both refuse and recyclable material to facilitate the separation of recyclable materials from other solid waste. Refuse disposal and recycling services are required by Section 66.0707 of the City of San Diego Land Development Code. Landscape maintenance would include the collection of green waste and disposal of green waste at recycling centers that accept green waste.

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

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

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

Visual Effects and Neighborhood Character

2015 PEIR

Visual Effects and Neighborhood Character is discussed in Section 5.15 of the 2015 Program EIR, which determined that future development under the CPUs could result in adverse impacts on the areas' visual quality and community character. Potential impacts include alteration of the communities' visual character by introducing development that is incompatible with the scale and design of surrounding development and landform; the alteration of the existing landform through grading, other construction activities, and erosion; and the introduction of substantial glare from new development that would adversely affect daytime or nighttime views. The Program EIR concluded that implementation of the CPUs would not result in significant impacts to the existing or planned character of the areas. Much of the CPU areas are already developed and future development was expected to take place on infill sites. New development projects are anticipated to

be developed in accordance with the City's General Plan, Land Development Code, as well as CPUs policies. Compliance with these existing policies and regulations would prevent development in excess of height and bulk regulations and ensure that any new development would be compatible with historic preservation standards, landform features such as hillsides, and any sensitive resources that may contribute to visual character.

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

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

Project

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

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

VI. Issues Not Analyzed in the Previous EIR

California Environmental Quality Act (CEQA) Guidelines, Section 15128, allows environmental issues for which there is no likelihood of a significant impact to not be discussed in detail or analyzed further in the EIR. The certified Environmental Impact Report (EIR) determined the Hilltop and provided a similar level of analysis, even for those issue areas considered to result in impacts found not to be significant.

Revisions to the project components evaluated under the EIR are proposed with the current project. Through the environmental analysis conducted, the City has determined that the current project, subject of and evaluated under this Addendum would not have the potential to cause significant impacts to those issue areas beyond those analyzed. While these issues were not analyzed in detail, as outlined in CEQA Section 15128, there is no new information available that would indicate that these issues would result in new significant impacts.

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

The project shall be required to comply with applicable mitigation measures outlined within the Mitigation Monitoring and Reporting Program (MMRP) of the previously certified Program EIR (No. 386029 / SCH No. 20144051075) and those identified with the project-specific subsequent technical studies. The following MMRP identifies measures that specifically apply to this project.

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

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

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

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

Qualified Paleontological Monitor, Qualified Biologist, Acoustician

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

CONTACT INFORMATION:

- a) The PRIMARY POINT OF CONTACT is the **RE** at the **Field Engineering Division – 858-627-3200**
- b) For Clarification of ENVIRONMENTAL REQUIREMENTS, applicant is also required to call **RE and MMC at 858-627-3360**
- 2. MMRP COMPLIANCE: This Project, Project Tracking System (PTS) Number 560527 and/or Environmental Document Number 560527, shall conform to the mitigation requirements contained in the associated Environmental Document and implemented to the satisfaction of the DSD's Environmental Designee (MMC) and the City Engineer (RE). The requirements may not be reduced or changed but may be annotated (i.e., to explain when and how compliance is being met and location of verifying proof, etc.). Additional clarifying information may also be added to other relevant plan sheets and/or specifications as appropriate (i.e., specific locations, times of monitoring, methodology, etc.

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

- 3. **OTHER AGENCY REQUIREMENTS:** Evidence of compliance with all other agency requirements or permits shall be submitted to the RE and MMC for review and acceptance prior to the beginning of work or within one week of the Permit Holder obtaining documentation of those permits or requirements. Evidence shall include copies of permits, letters of resolution, or other documentation issued by the responsible agency.
 - National Pollutant Discharge Elimination System (NPDES) Municipal Storm Water Permit Compliance;
 - NPDES General Construction Activity Permit for Storm Water Discharges Compliance;
 - California Fish and Game Code Section 1602 Streambed Alteration Agreement;
 - Federal Clean Water Act Section 404 Permit; and
 - Federal Clean Water Act Section 401 Water Quality Certification
- 4. MONITORING EXHIBITS: All consultants are required to submit, to RE and MMC, a monitoring exhibit on a 11x17 reduction of the appropriate construction plan, such as site plan, grading, landscape, etc., marked to clearly show the specific areas including the LIMIT OF WORK, scope of that

discipline's work, and notes indicating when in the construction schedule that work would be performed. When necessary for clarification, a detailed methodology of how the work would be performed shall be included.

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

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

Document Submittal/Inspection Checklist				
Issue Area	Document Submittal	Associated Inspection/Approvals/Notes		
General	Consultant Qualification Letters	Prior to Preconstruction Meeting		
General	Consultant Construction Monitoring Exhibits	Prior to or at Preconstruction Meeting		
Biology	Biologist Limit of Work Verification	Limit of Work Inspection		
Visual Quality	Contour Grading Verification Letter	Contour Grading/Staking Inspection		
Paleontology	Paleontology Reports	Paleontology Site Observation		
Noise	Acoustical Reports	Noise Mitigation Features Inspection		
Waste Management	Waste Management Reports	Waste Management Inspections		
Bond Release	Request for Bond Release Letter	Final MMRP Inspections Prior to Bond Release Letter		

C. SPECIFIC MMRP ISSUE AREA CONDITIONS/REQUIREMENTS

Noise

I. Prior to issuance of any residential building permit, the Owner/Permitee shall submit an exterior to interior noise analysis to identify appropriate sound transmission reduction measures necessary to achieve an interior noise level that would not exceed 45 dBA.

II. Prior to issuance of Final Inspection/Occupancy, the Owner/Permitee shall submit two copies of the final acoustical report with construction documents to the Building Inspector, to verify that interior acoustical levels of 45 dBA has been achieved.

Biological Resources - Uplands (Habitat Acquisition Fund)

Prior to Notice to Proceed (NTP) for any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits, the owner/permittee shall make payment to the City of San Diego Habitat Acquisition Fund (HAF) to mitigate for the loss of 0.30 acre of Diegan coastal sage scrub (Tier II) and 0.62 acre of non-native grassland (Tier IIIB). This payment is based on mitigation ratios, per the City of San Diego Biology Guidelines (2012). Impacts to Diegan coastal sage scrub (Tier II) inside of the MHPA shall be required at a mitigation ratio of 1:1 (approximately 0.30 acre) and outside of the MHPA at a mitigation ratio of 1.5:1 (approximately 0.45 acre). Impacts to non-native grassland (Tier IIIB) inside of the MHPA shall be required at a mitigation ratio of 0.5:1 (approximately 0.31 acre) and outside of the MHPA at a mitigation ratio of 1.5:1 (approximately 0.62 acre). The equivalent contribution payment into the City's HAF shall also include a ten (10) percent administrative fee.

Biological Resources

I. Prior to Construction

- A. Biologist Verification: The owner/permittee shall provide a letter to the City's Mitigation Monitoring Coordination (MMC) section stating that a Project Biologist (Qualified Biologist) as defined in the City of San Diego's Biological Guidelines (2012), has been retained to implement the project's biological monitoring program. The letter shall include the names and contact information of all persons involved in the biological monitoring of the project.
- **B. Preconstruction Meeting**: The Qualified Biologist shall attend the preconstruction meeting, discuss the project's biological monitoring program, and arrange to perform any follow up mitigation measures and reporting including site-specific monitoring, restoration or revegetation, and additional fauna/flora surveys/salvage.
- C. Biological Documents: The Qualified Biologist shall submit all required documentation to MMC verifying that any special mitigation reports including but not limited to, maps, plans, surveys, survey timelines, or buffers are completed or scheduled per City Biology Guidelines, MSCP, ESL Ordinance, project permit conditions; CEQA; endangered species acts (ESAs); and/or other local, state or federal requirements.
- **D. BCME**: The Qualified Biologist shall present a Biological Construction Mitigation/Monitoring Exhibit (BCME), which includes the biological documents in C above. In addition, include: restoration/revegetation plans, plant salvage/relocation requirements (e.g., coastal cactus

wren plant salvage, burrowing owl exclusions, etc.), avian or other wildlife surveys/survey schedules (including nesting surveys for yellow-breasted chat, yellow warbler, and Cooper's hawk, <u>Least Bell's</u> <u>Vireo</u>), timing of surveys, wetland buffers, avian construction avoidance areas/noise buffers/ barriers, other impact avoidance areas, and any subsequent requirements determined by the Qualified Biologist and the City ADD/MMC. The BCME shall include a site plan, written and graphic depiction of the project's biological mitigation/monitoring program, and a schedule. The BCME shall be approved by MMC and referenced in the construction documents.

Ε.

Avian Protection Requirements: To avoid any direct impacts to sensitive bird species such as yellow-breasted chat, yellow warbler, and Cooper's hawk, and Least Bell's Vireo removal of habitat that supports active nests in the proposed area of disturbance should occur outside of the breeding season for these species (February 1 to September 15). If removal of habitat in the proposed area of disturbance must occur during the breeding season, the Qualified Biologist shall conduct a pre-construction survey to determine the presence or absence of the yellow-breasted chat, yellow warbler, and Cooper's hawk, on the proposed area of disturbance. The preconstruction survey shall be conducted within 10 calendar days prior to the start of construction activities (including removal of vegetation). The applicant shall submit the results of the preconstruction survey to City DSD for review and approval prior to initiating any construction activities. If nesting birds are detected, a letter report or mitigation plan in conformance with the City's Biology Guidelines and applicable State and Federal Law (i.e., appropriate follow up surveys, monitoring schedules, construction and noise barriers/buffers, etc.) shall be prepared and include proposed measures to be implemented to ensure that take of birds or eggs or disturbance of breeding activities is avoided. The report or mitigation plan shall be submitted to the City for review and approval and implemented to the satisfaction of the City. The City's MMC Section or RE, and Biologist shall verify and approve that all measures identified in the report or mitigation plan are in place prior to and/or during construction.

F.

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

II. During Construction

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

III. Post Construction Measures

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

PALEONTOLOGICAL RESOURCES

I. Prior to Permit Issuance

- A. Entitlements Plan Check
 - 1. Prior to issuance of any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans, but prior to the first precon meeting, whichever is applicable, the ADD

Environmental designee shall verify that the requirements for paleontological monitoring have been noted on the appropriate construction documents.

- B. Letters of Qualification have been submitted to ADD
 - 1. The applicant shall submit a letter of verification to MMC identifying the PI for the project and the names of all persons involved in the paleontological monitoring program, as defined in the City Paleontology Guidelines.
 - 2. MMC will provide a letter to the applicant confirming the qualifications of the PI and all persons involved in the paleontological monitoring of the project.
 - 3. Prior to the start of work, the applicant shall obtain approval from MMC for any personnel changes associated with the monitoring program.

II. Prior to Start of Construction

- A. Verification of Records Search
 - The PI shall provide verification to MMC that a site-specific records search has been completed. Verification includes, but is not limited to a copy of a confirmation letter from San Diego Natural History Museum, other institution or, if the search was in-house, a letter of verification from the PI stating that the search was completed.
 - 2. The letter shall introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities.
- B. PI Shall Attend Precon Meetings
 - Prior to beginning any work that requires monitoring; the Applicant shall arrange a precon meeting that shall include the PI, CM, and/or Grading Contractor, RE, BI, if appropriate, and MMC. The qualified paleontologist shall attend any grading/excavation related precon meetings to make comments and/or suggestions concerning the paleontological monitoring program with the CM and/or Grading Contractor.
 - a. If the PI is unable to attend the precon meeting, the Applicant shall schedule a focused precon meeting with MMC, the PI, RE, CM or BI, if appropriate, prior to the start of any work that requires monitoring.
 - 2. Identify Areas to be Monitored Prior to the start of any work that requires monitoring, the PI shall submit a Paleontological Monitoring Exhibit (PME) based on the appropriate construction documents (reduced to 11x17) to MMC identifying the areas to be monitored including the delineation of grading/excavation limits. The PME shall be based on the results of a site-specific records search as well as information regarding existing known soil conditions (native or formation).
 - 3. When Monitoring Will Occur
 - a. Prior to the start of any work, the PI shall also submit a construction schedule to MMC through the RE indicating when and where monitoring will occur.

b. The PI may submit a detailed letter to MMC prior to the start of work or during construction requesting a modification to the monitoring program. This request shall be based on relevant information such as review of final construction documents which indicate conditions such as depth of excavation and/or site graded to bedrock, presence or absence of fossil resources, etc., which may reduce or increase the potential for resources to be present.

III. During Construction

- A. Monitor Shall be Present During Grading/Excavation/Trenching
 - The monitor shall be present full time during grading/excavation/ trenching activities as identified on the PME that could result in impacts to formations with high and moderate resource sensitivity. The CM is responsible for notifying the RE, PI, and MMC of changes to any construction activities such as in the case of a potential safety concern within the area being monitored. In certain circumstances OSHA safety requirements may necessitate modification of the PME.
 - 2. The PI may submit a detailed letter to MMC during construction requesting a modification to the monitoring program when a field condition such as trenching activities that do not encounter formational soils as previously assumed, and/or when unique/unusual fossils are encountered, which may reduce or increase the potential for resources to be present.
 - 3. The monitor shall document field activity via the CSVR. The CSVRs shall be faxed by the CM to the RE the first day of monitoring, the last day of monitoring, monthly (Notification of Monitoring Completion), and in the case of ANY discoveries. The RE shall forward copies to MMC.
- B. Discovery Notification Process
 - 1. In the event of a discovery, the Paleontological Monitor shall direct the contractor to temporarily divert trenching activities in the area of discovery and immediately notify the RE or BI, as appropriate.
 - 2. The Monitor shall immediately notify the PI (unless Monitor is the PI) of the discovery.
 - 3. The PI shall immediately notify MMC by phone of the discovery, and shall also submit written documentation to MMC within 24 hours by fax or email with photos of the resource in context, if possible.
- C. Determination of Significance
 - 1. The PI shall evaluate the significance of the resource.
 - a. The PI shall immediately notify MMC by phone to discuss significance determination and shall also submit a letter to MMC indicating whether additional mitigation is required. The determination of significance for fossil discoveries shall be at the discretion of the PI.
 - b. If the resource is significant, the PI shall submit a Paleontological Recovery Program (PRP) and obtain written approval from MMC. Impacts to significant resources must be mitigated before ground disturbing activities in the area of discovery will be allowed to resume.

- c. If resource is not significant (e.g., small pieces of broken common shell fragments or other scattered common fossils), the PI shall notify the RE, or BI as appropriate, that a non-significant discovery has been made. The Paleontologist shall continue to monitor the area without notification to MMC unless a significant resource is encountered.
- d. The PI shall submit a letter to MMC indicating that fossil resources will be collected, curated, and documented in the Final Monitoring Report. The letter shall also indicate that no further work is required.

IV. Night and/or Weekend Work

- A. If night and/or weekend work is included in the contract.
 - 1. When night and/or weekend work is included in the contract package, the extent and timing shall be presented and discussed at the precon meeting.
 - 2. The following procedures shall be followed.
 - a. No Discoveries In the event that no discoveries were encountered during night and/or weekend work, the PI shall record the information on the CSVR and submit to MMC via fax by 8 A.M. on the next business day.
 - Discoveries All discoveries shall be processed and documented using the existing procedures detailed in Section III - During Construction.
 - c. Potentially Significant Discoveries If the PI determines that a potentially significant discovery has been made, the procedures detailed under Section III During Construction shall be followed.
 - d. The PI shall immediately contact MMC, or by 8 A.M. on the next business day to report and discuss the findings as indicated in Section III-B, unless other specific arrangements have been made.
- B. If night work becomes necessary during the course of construction
 - 1. The CM shall notify the RE, or BI, as appropriate, a minimum of 24 hours before the work is to begin.
 - 2. The RE, or BI, as appropriate, shall notify MMC immediately.
- C. All other procedures described above shall apply, as appropriate.

V. Post Construction

- A. Preparation and Submittal of Draft Monitoring Report
 - The PI shall submit two copies of the Draft Monitoring Report (even if negative), prepared in accordance with the Paleontological Guidelines which describes the results, analysis, and conclusions of all phases of the paleontological monitoring program (with appropriate graphics) to MMC for review and approval within 90 days following the completion of monitoring,
 - a. For significant paleontological resources encountered during monitoring, the paleontological recovery program shall be included in the Draft Monitoring Report.
 - b. Recording Sites with the San Diego Natural History Museum The Pl shall be responsible for recording (on the appropriate forms) any

significant or potentially significant fossil resources encountered during the paleontological monitoring program in accordance with the City's Paleontological Guidelines, and submittal of such forms to the San Diego Natural History Museum with the Final Monitoring Report.

- 2. MMC shall return the Draft Monitoring Report to the PI for revision or, for preparation of the Final Report.
- 3. The PI shall submit revised Draft Monitoring Report to MMC for approval.
- 4. MMC shall provide written verification to the PI of the approved report.
- 5. MMC shall notify the RE or BI, as appropriate, of receipt of all Draft Monitoring Report submittals and approvals.
- B. Handling of Fossil Remains
 - 1. The PI shall be responsible for ensuring that all fossil remains collected are cleaned and catalogued.
 - The PI shall be responsible for ensuring that all fossil remains are analyzed to identify function and chronology as they relate to the geologic history of the area; that faunal material is identified as to species; and that specialty studies are completed, as appropriate.
- C. Curation of fossil remains: Deed of Gift and Acceptance Verification
 - 1. The PI shall be responsible for ensuring that all fossil remains associated with the monitoring for this project are permanently curated with an appropriate institution.
 - 2. The PI shall include the Acceptance Verification from the curation institution in the Final Monitoring Report submitted to the RE or BI and MMC.
- D. Final Monitoring Report(s)
 - 1. The PI shall submit two copies of the Final Monitoring Report to MMC (even if negative), within 90 days after notification from MMC that the draft report has been approved.
 - 2. The RE shall, in no case, issue the Notice of Completion until receiving a copy of the approved Final Monitoring Report from MMC which includes the Acceptance Verification from the curation institution.

VIII. SIGNIFICANT UNMITIGATED IMPACTS

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

Findings" which stated: (a) specific economic, social, or other considerations which make infeasible the mitigation measures or project alternatives identified in the final Program EIR, and (b) the impacts have been found acceptable because of specific overriding considerations. Given that there are no new or more severe significant impacts that were not already addressed in the previous certified Program EIR, new CEQA Findings and or Statement of Overriding Considerations are not required.

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

IX. CERTIFICATION

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

E. Shearer-Nguyen, Senior Planner Development Services Department

Analyst: SHEARER-NGUYEN

Attachments:

Figure 1: Project Location Map Figure 2: Aerial Photograph Figure 3: Site Plan October 17, 2018 Date of Final Report





Location Map

<u>Hilltop/Euclid Mixed-Use Development -Project 560527</u> 922-1040 Euclid Avenue and 5012 Hilltop Drive





Aerial Photograph

<u>Hilltop/Euclid Mixed-Use Development -Project 560527</u> City of San Diego – Development Services Department Figure 2

Proposed Site Plan

<u>Euclid and Hilltop Mixed-Use Development – Project No. 560527</u> City of San Diego – Development Services Department Figure 3