



THE CITY OF SAN DIEGO

## ADDENDUM TO AN ENVIRONMENTAL IMPACT REPORT

Project No. 591198  
Addendum to EIR No. 96101  
SCH No. 2009101036

**SUBJECT: 6<sup>TH</sup> AND OLIVE:** VESTING TENTATIVE MAP (VTM) to consolidate five lots into one parcel and establish a condominium project with 204 residential units and four commercial units; SITE DEVELOPMENT PERMIT (SDP) No. 2078814 to amend SDP 312733, and a NEIGHBORHOOD DEVELOPMENT PERMIT (NDP) No. 2078816 to amend NDP 534371; to allow for an amendment to the 1.76-acre St. Paul's Cathedral and Residences project to modify previously approved development on the 0.62-acre Olive Site and increase overall density from 110 dwelling units to 249 dwelling units in accordance with the City's Affordable Housing Regulations. More specifically, the project would demolish a 21,813-square-foot, 16-unit market rate apartment building, 4,973-square-foot administrative offices that serve adjacent St. Paul's Cathedral, and a 4,440-square-foot 20-space surface parking lot and construct a 20-story, 262,530-gross-square-foot mixed-use development with five levels (approximately 144,785 square feet) of underground parking. The project would include 204 residential units (including 18 units affordable to very low-income households), 16,190 gross square feet of cathedral office space to serve St. Paul's Cathedral, and a 10,600-square-foot courtyard shared with St. Paul's Cathedral that would include landscaping and benches. The project would also construct various on-site improvements (a transformer would be relocated from the 6<sup>th</sup> and Olive Site to the adjacent Cathedral Site and a new staircase would be installed at the Cathedral Site to replace one that is being demolished). The project includes affordable housing incentives in the form of deviations from the development regulations pertaining to setback, loading spaces, and personal storage area. The project also includes two additional deviations from the development regulations pertaining to refuse and recyclable materials storage area and driveway width. The overall 1.76-acre project site is located within one full block surrounded by Olive Street, Nutmeg Street, 5<sup>th</sup> Avenue and 6<sup>th</sup> Avenue, and a 0.46-acre site located on the southeast corner of Nutmeg Street and 5<sup>th</sup> Avenue. The 0.62-acre Olive Site, which is the subject of the proposed amendment to the St. Paul Cathedral and Residences project is located on Olive Street, between Fifth Avenue and Sixth Avenue. The site has a land use designation of Residential Very High (74 – 109 dwelling units per acre) and Community Commercial (0-109 dwelling units per area) and is zoned CC-3-9 on the western half and RM-4-10 on the eastern half within the Uptown Community Plan area. Additionally, the project site is within the Community Plan Implementation Overlay Zone (CPIOZ-Type A), Residential Tandem Parking Overlay Zone, Transit Area Overlay Zone, Transit Priority Area, Airport Influence Area (San Diego International Airport (SDIA) Review Area 2), Federal Aviation Administration (FAA) Part 77 Notification (SDIA and North Island Naval Air Station (NAS)), and the Airport Approach



Overlay Zone (AAOZ) for SDIA. (LEGAL DESCRIPTION: Lots A, B, E, F, G, H, K and L in Block 306 of Horton's Addition, according to map thereof made by L.L. Locking, Parcels 1 and 2 of Parcel Map No. 21586, filed on May 16, 2018, and Lot 1, Map No. 16016, entitled "5<sup>th</sup> & Nutmeg" filed March 25, 2015.) Applicant: Greystar GP II, LLC.

## I. Summary of Original Project

The City prepared an Environmental Impact Report (No. 96101/SCH No. 2009101036) for the St. Paul's Cathedral and Residences (St. Paul's EIR). (See Figure 1, *Project Location Map*, and Figure 2, *Aerial Photo*.) The St. Paul's EIR was certified and the project was approved on November 8, 2011, per Resolution No. R-307114. Approvals included Site Development Permit No. 312733, Neighborhood Development Permit No. 534371, and Vesting Tentative Map No. 851727), which governed development of the 1.76-acre area consisting of the Olive Site, Cathedral Site, and Nutmeg Site.

The 2011 EIR found that the St. Paul's Cathedral and Residences project would result in significant environmental impacts associated with Traffic/Circulation/Parking, Historical Resources, Noise, and Paleontological Resources. Mitigation measures were identified that would reduce project impacts to below a level of significance. The EIR did not identify any significant unmitigated impacts.

The approved St. Paul's Cathedral and Residences project allowed for the construction of two mixed-use buildings with a total of 110 dwelling units, 20,027 square feet of office use, and 6,109 square feet of retail. The EIR also analyzed renovations associated with the St. Paul's Cathedral. Development of the Nutmeg Site component of the St. Paul's Cathedral and Residences project has been completed in accordance with existing project approvals. The approved renovation/expansion of the Cathedral Site component of the St. Paul's project, as well as the mixed-use building on the 6<sup>th</sup> and Olive Site, have not yet begun. The three project components – the 6<sup>th</sup> and Olive Site, the Cathedral Site, and the Nutmeg Site – are represented in Figure 3, *Project Components*. A summary and status of the St. Paul's Cathedral and Residences project are included as Table 1, *St. Paul's Project and Status*.

**Table 1. St. Paul's Cathedral and Residences Project and Status**

	Approved	Constructed
Cathedral Site	<ul style="list-style-type: none"> <li>Renovation and expansion</li> <li>Increase floor area by approximately 4,030 net square feet</li> </ul>	None to date.
Nutmeg Site	<ul style="list-style-type: none"> <li>13 stories</li> <li>Approximately 150 feet in height</li> <li>45 residential units</li> <li>5,818 square feet office</li> <li>5,185 square feet retail/restaurant</li> <li>153,801 square feet building gross floor area (excluding garage)</li> </ul>	<ul style="list-style-type: none"> <li>7 stories</li> <li>Approximately 92 feet in height</li> <li>45 residential units</li> <li>6,722 square feet retail/restaurant</li> <li>98,794 square feet building gross floor area (excluding garage)</li> </ul>
6 <sup>th</sup> and Olive Site	<ul style="list-style-type: none"> <li>15 stories</li> <li>Approximately 158 feet in height</li> <li>65 residential units</li> <li>14,209 square feet office (for church use)</li> <li>924 square feet retail</li> <li>166,389 square feet building gross floor area (excluding garage)</li> </ul>	None to date.



### Nutmeg Site

The Nutmeg Site contains 20,075 square feet of land area. The Nutmeg Site was approved for the construction of a 13-story building (approximately 92 feet tall) with 45 dwelling units. Approximately 5,818 square feet of offices were approved for the first floor, along with 5,185 square feet of retail or restaurant space along the Fifth Avenue frontage. Parking was to be provided in three levels of below-grade parking. The approved total building gross floor area, excluding garage, was 153,801 square feet. Through a Substantial Conformance Review (SCR) process in 2013, a modified version of the Nutmeg building was approved. In accordance with the approved SCR, the Nutmeg Site has been fully developed as the Vue on 5<sup>th</sup> condominiums, with 45 dwelling units in seven stories, 6,722 square feet of retail space, and two levels of subterranean parking. The total building gross floor area, excluding parking, is 98,794 square feet.

### Cathedral Site

The Cathedral Site contains 29,503 square feet of land area. The St. Paul's project approved the renovation and expansion of St. Paul's Cathedral on the Cathedral Site. The four-phase renovation/expansion includes demolition of the existing administration building (located on the 6<sup>th</sup> and Olive Site) along with interior and exterior expansion of the original Cathedral, resulting in an overall net increase in building footprint of approximately 4,030 square feet, which is primarily circulation space. There will be no enlargement to the congregational seating area. To date, no renovation or expansion has occurred per the St. Paul's project.

### 6<sup>th</sup> and Olive Site

Under the prior approval, the existing 16-unit apartment building (Park Chateau Apartments) and 20-space surface parking lot used by St. Paul's Cathedral would be demolished to allow for the development of a 15-story building (approximately 158 feet high) with 65 dwelling units. A total of 14,209 square feet of Cathedral office use was also approved, along with 924 square feet of retail space. Parking was to be provided in a three-level subterranean garage. Total building gross floor area for the 6<sup>th</sup> and Olive Site, excluding the garage, was 166,389 square feet. Additionally, a common 10,600-square-foot courtyard to be shared with the Cathedral that included landscaping and benches was to be provided.

## **II. PROJECT DESCRIPTION**

A request for a VESTING TENTATIVE MAP (VTM) to consolidate five lots into one parcel and establish a condominium project with 204 residential units and four commercial units; SITE DEVELOPMENT PERMIT (SDP) No. 2078814 to amend SDP 312733, and a NEIGHBORHOOD DEVELOPMENT PERMIT (NDP) No. 2078816 to amend NDP 534371 to allow for an amendment to the 1.76-acre St. Paul's Cathedral and Residences project to modify previously approved development on the 0.62-acre Olive Site and increase overall density from 110 dwelling units to 249 dwelling units in accordance with the City's Affordable Housing Regulations. More specifically, the project would demolish a 21,813-square-foot, 16-unit market rate apartment building, 4,973-square-foot administrative offices that serve adjacent St. Paul's Cathedral, and a 4,440-square-foot, 20-space surface parking lot and construct a 20-story, 262,530-gross-square-foot mixed-use development with five levels (approximately 144,785 square feet) of underground parking. The project would include 204



residential units (including 18 units affordable to very low- income households), 16,190 gross square feet of cathedral office space to serve St. Paul's Cathedral, and a 10,600-square-foot courtyard shared with St. Paul's Cathedral that would include landscaping and benches (project). Additionally, a transformer would be relocated from the 6<sup>th</sup> and Olive Site to the adjacent Cathedral Site, and a new staircase would be installed at the Cathedral Site to replace one that is being demolished. (See Figure 4, *Site Plan*.)

The project is consistent with the Uptown Community Plan land use designations and the underlying zones for the 6<sup>th</sup> and Olive Site. Located in the Park West neighborhood of the Uptown Community Plan area, the 6<sup>th</sup> and Olive project site is designated as Residential – Very High (74 to 109 dwelling units per acre) in the eastern half and Community Commercial (0 to 109 dwelling units per acre) in the western half. The proposed project would provide very high-density multi-family residential development (157 du/ace) with commercial office space. The 6<sup>th</sup> and Olive Site is split-zoned, with the eastern half zoned RM-4-10 and the western half zoned CC-3-9. The proposed project is consistent with the underlying zones, which allow residential development up to 109 dwelling units per acre within either zone, along with office uses. (All figures are provided at the end of the report.)

A maximum of 192 dwelling units is allowed on the 1.76-acre project site based on the UCP land use designations of Residential-Very High (74-109 du/ac) and Community Commercial (0-109 du/ac), and the underlying CC-3-9 and RM-4-10 Zones, which allow a density of one dwelling unit per 400 square feet. The Nutmeg Site has been developed with 45 multi-family dwelling units, allowing for a maximum of 147 dwelling units on the Olive and Cathedral sites. The project proposes on-site affordable housing equivalent to 12 percent of the remaining base density units on the Cathedral and Olive Sites. Pursuant to the City's Affordable Housing Regulations, the inclusion of the 18 very low-income affordable units allows for a housing density bonus of 38.75 percent. The density bonus results in 57 additional units for a total of 204 residential units (including the affordable units) on the Olive Site, yielding residential density of 157 du/ac on the Nutmeg and Olive Sites, and an overall total of 249 residential units on the 1.76-acre site.

The Land Development Code (LDC), Section §143.0740, allows incentives for Affordable Housing Density Bonus projects. The project would be requesting incentives, in the form of deviations, as follows:

1. Setback – A deviation from San Diego Municipal Code (SDMC) §131.0443(g) to allow a zero-foot setback on Olive Street where 15 feet would be required;
2. Loading Parking Spaces – A deviation from SDMC § 142.1010 to allow one off-site loading space where two on-site loading spaces would be required; and
3. Storage Area – A deviation from SDMC § 142.0560(j)(1), Table 142-05M to allow only 50 percent of the units to have a storage area where a minimum of 240 cubic feet of a fully enclosed personal storage space per unit within the RM zone would otherwise be required.



In addition, Section §143.0920 of the LDC allows deviations from the applicable development regulations as additional development incentives for affordable housing projects pursuant to an NDP provided that the findings in Section 126.0504(a) and the supplemental findings in Section §126.0504(1) are made. The project would also therefore be requesting the following deviations:

1. Driveway Width Dimension – A deviation from SDMC § 142.0560(j)(1), Table 142-05M to allow a minimum dimension of 20.5-foot-wide where 24 feet would be required; and
2. Refuse and Recycle Storage Area – A deviation from SDMC § 142.0820(a) and (b) to allow 470 square feet where 960 square feet (864 square feet for residential component and 96 square feet for non-residential component) would be required.

The project would require grading of the entire project site. Earthwork would include approximately 58,500 cubic yards of cut to a depth of approximately 60.8 feet, primarily for construction of the subterranean garage. Fill soils would not be required; therefore, approximately 58,500 cubic yards of material would be exported. Drainage would be provided consistent with the City's Storm Water Regulations and be directed into appropriate storm drain systems designated to carry surface runoff, which has been reviewed and accepted by City Engineering staff. Landscaping would also be provided consistent with the City's Landscape Regulations.

Vehicular access to all project components (i.e., the residential tower and the administrative offices associated with St. Paul's Cathedral) would be via a driveway on Olive Street. The project provides a total of 348 off-street parking spaces comprised of 278 parking spaces associated with the residential component and 70 parking spaces associated with the St. Paul's office space, exceeding the 214 off-street parking spaces required for the project. Project parking is provided in the underground parking garage with access provided via a driveway on Olive Street.

### **III. ENVIRONMENTAL SETTING**

The overall developed 1.76-acre project site is located within one full block surrounded by Olive Street, Nutmeg Street, 5<sup>th</sup> Avenue and 6<sup>th</sup> Avenue, and a 0.46-acre site located on the southeast corner of Nutmeg Street and 5<sup>th</sup> Avenue. The 0.62-acre Olive Site, which is the subject of the proposed amendment to the St. Paul Cathedral and Residences project, is located on Olive Street and situated west of Sixth Avenue, east of Fifth Avenue, south of Olive Street, and north of Nutmeg Street within the Park West neighborhood. The topography of the 6<sup>th</sup> and Olive Site is relatively flat. Elevations vary from approximately 266 feet above mean sea level (AMSL) in the southwest corner to approximately 274 feet AMSL at the northeast corner. Vehicular access to the 6<sup>th</sup> and Olive Site is currently available from Sixth Avenue and Olive Street. Surrounding development includes regional-serving Balboa Park to the east, and a mix of multi-family residential, office, and retail uses to the north and west. St. Paul's Cathedral and the Vue on 5<sup>th</sup> condominium development occurs immediately south of the project site.

The site is designated Residential – Very High (74 to 109 dwelling units per acre) on the eastern half and Community Commercial (0 to 109 dwelling units per acre) on the western half within the Uptown Community Plan area. Reflecting the dual land use designations, the project site is split zoned, with the eastern half zoned RM-4-10 and the western half zoned CC-3-9. Additionally, the site is within the Community Plan Implementation Overlay Zone (CPIOZ-Type A), Residential Tandem



Parking Overlay Zone, Transit Area Overlay Zone, Transit Priority Area, Airport Influence Area SDIA Review Area 2, Federal Aviation Administration (FAA) Part 77 Notification Area (SDIA and North Island NAS), is partially within the Airport Approach Overlay Zone (SDIA), and within the Affordable Housing Parking Demand area. The site is in a developed urban area currently served by existing public services and utilities.

#### **IV. ENVIRONMENTAL DETERMINATION**

The City previously prepared and certified the St. Paul's EIR (No. 96101/SCH No. 2009101036), per Resolution No. R-307114 on November 8, 2011. Based on all available information, the analysis in this EIR Addendum, and in light of the entire record, the City has determined pursuant to Section 15762 and 15764 of the State CEQA Guidelines that:

- There are no substantial changes proposed in the project which will require major revisions of the previous environmental document due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
- Substantial changes have not occurred with respect to the circumstances under which the project is undertaken which will require major revisions of the previous environmental document due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- There is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous environmental document was certified as complete or was adopted, that 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 that are considerably different from those analyzed in the previous environmental document would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

Based upon a review of the current project, none of the conditions described in Sections 15162 and 15164 of the State CEQA Guidelines apply. No changes in circumstances have occurred, and no new information of substantial importance has manifested which would result in new significant or substantially increased adverse impacts as a result of the project. Therefore, this Addendum has been prepared in accordance with Section 15164 of the CEQA State Guidelines. The St. Paul's EIR is



herein incorporated by reference pursuant to CEQA Guidelines Section 15150. Public review of this Addendum is not required per CEQA.

## V. IMPACT ANALYSIS

This Addendum includes the subsequent impact analysis to demonstrate that environmental impacts associated with the proposed project are consistent with or not greater than the impacts disclosed in the previously certified St. Paul's EIR. The following includes the environmental issues analyzed in detail in the St. Paul's EIR, as well as project-specific analysis, pursuant to CEQA. The analysis in this document evaluates the adequacy of the St. Paul's EIR relative to the project. The following analysis documents that the project's proposed modification and/or refinements would not cause new or more severe significant impacts than those identified in the St. Paul's EIR.

The following analysis indicates there would be no new significant impacts, nor would there be an increase in the severity of impacts resulting from the project. Further, there is no new information in the record or otherwise available indicating that there are substantial changes in circumstances that would require major changes to the St. Paul's EIR. A summary of project impacts in relation to the St. Paul's EIR is provided in Table 2, *Impact Assessment Summary*.

**Table 2. Impact Assessment Summary**

<b>Environmental Issue</b>	<b>2011 EIR Finding</b>	<b>Project</b>	<b>New Mitigation</b>	<b>Project Resultant Impact</b>
Land Use and Planning	Less than Significant	No new impacts	No	Less than Significant
Visual Quality/Community Character	Less than Significant	No new impacts	No	Less than Significant
Traffic/Circulation and Parking	Significant, but mitigated	No new impacts	No	Significant, but mitigated
Air Quality	Less than Significant	No new impacts	No	Less than Significant
Historical Resources	Significant, but mitigated	No new impacts	No	Significant, but mitigated
Noise	Significant, but mitigated	No new impacts	No	Significant, but mitigated
Paleontological Resources	Significant, but mitigated	No new impacts	No	Significant, but mitigated
Light/Glare/Shading	Less than significant	No new impacts	No	Less than significant
Public Services and Facilities	Less than significant	No new impacts	No	Less than significant
Solid Waste Disposal	Significant, but mitigated	No new impacts	No	Less than significant
Energy	Less than significant	No new impacts	No	Less than significant
Greenhouse Gas	Less than significant	No new impacts	No	Less than significant



## **Land Use and Planning**

### ***ST. PAUL'S EIR***

Potential impacts to land use and planning were analyzed in Section 4.1 of the St. Paul's EIR. The St. Paul's Project required eight deviations, including street wall setback in the CV-1 zone, street side yard in the MR-400 zone, on-site loading area in the CV-1 zone, vision glass above the ground floor, height limit in the MR-400 and CV-1 zones, front yard dimension in the MR-400 zone, visibility triangles, and floor area ratio (FAR) in the MR-400 zone. The St. Paul's EIR concluded that the deviations were reasonable and appropriate for an urban scale mixed-use development. The deviations were requested to compensate for the split-zone requirements on the Olive Site and to respond to community input on project design as viewed from Balboa Park. Although the proposed on-site affordable housing was removed from the St. Paul's Project at the time of approval, the deviations were also justified by the provision of on-site affordable housing in accordance with SDMC Section 1512.0203(b)(4) and by the preservation and enhancement of historic resources (i.e., St. Paul's Cathedral). For the original project to be economically viable and provide affordable housing on-site, it was necessary for deviations to allow for the maximization of density. As such, impacts associated with land use relative to deviations were determined to be less than significant.

The St. Paul's EIR concluded that the project was consistent with applicable adopted plans and policies. The project was determined to be consistent with the City of San Diego General Plan and would implement the goals and policies of the City of Villages strategy through development of a high-density, mixed-use project within an urban village setting. The project was also determined to be consistent with the 1988 Uptown Community Plan, which was at the time the adopted and effective community plan, as the project site is in an area designated for mixed-use residential/commercial uses at a higher intensity with specialized commercial uses, allowed in high rise buildings. Although the original project required deviations, the EIR – as noted above – concluded that the deviations requested did not result in a conflict with the environmental goals of the Community Plan. Additionally, the project was concluded to be consistent with the Regional Comprehensive Plan and the Regional Transportation Plan. No impacts relative to land use consistency would result from implementation of the St. Paul's Project.

The St. Paul's EIR concluded that the project would not physically divide a community. The project site is in a mixed-use area characterized by a variety of land uses, architectural styles, building heights, and residential densities and building types. Additionally, the project was found to be in conformance with the existing zoning and land use designations. No significant impacts would result.

The St. Paul's EIR concluded that the project was compatible with the adopted SDIA Airport Land Use Compatibility Plan (ALUCP) and consistent with airport land use planning and the Airport Approach Overlay Zone. The project is located in the Airport Influence Area Review Area 2 as shown in the adopted ALUCP for SDIA. Structures associated with the original project were determined to be outside the 60 CNEL noise contour per California Building Code Section 1208A.8.2. Per established standards set by FAA, the San Diego County Regional Airport Authority (SDCRAA), the State, and the City, the location and height of the structures were compatible with aircraft using SDIA.



## **PROPOSED PROJECT**

Since approval of the St. Paul's Project in 2011, the Uptown Community Plan underwent an update and was subsequently approved in November 2016. The Uptown Community Plan Update included application of General Plan land use categories and City-wide zoning to the Uptown community, resulting in different land use designations and zoning on the site than was in place for the St. Paul's project. Per the Uptown Community Plan Update, the project site has a land use designation of Community Commercial (0-109 dwelling units per acre (du/ac)) on the western portion and Residential – Very High (74-109 du/ac) on the eastern portion. Reflecting these land use designations, the site is zoned CC-3-9 (Commercial – Community) on the western portion of the site and RM-4-10 (Residential – Multiple Unit) on the eastern portion of the site. The project proposes a mixed-use development with very high density residential and commercial office uses, consistent with the underlying zones and land use designations. The project proposes a residential density of 157 du/ac, which is allowed through an affordable housing density bonus.

The project would utilize three incentives and proposes two deviations, which are allowable under the SDMC. The LDC, Section §143.0740, allows incentives for Affordable Housing Density Bonus projects. The project would be requesting incentives, in the form of deviations, as follows:

1. Setback – A deviation from SDMC §131.0443(g) to allow a zero-foot setback on Olive Street where 15 feet would be required;
2. Loading Parking Spaces – A deviation from SDMC §142.1010 to allow one off-site loading space where two on-site loading spaces would otherwise be required; and
3. Storage Area – A deviation from SDMC § 142.0560(j)(1), Table 142-05M to allow only 50 percent of the units to have a storage area where a minimum of 240 cubic feet of a fully enclosed personal storage space per unit within the RM zone would be required.

In addition, Section §143.0920 of the LDC allows deviations from the applicable development regulations as additional development incentives for affordable housing projects pursuant to an NDP provided that the findings in Section 126.0504(a) and the supplemental findings in Section §126.0504(1) are made. The project would also therefore be requesting the following deviations:

1. Driveway Width Dimension – A deviation from SDMC § 142.0560(j)(1), Table 142-05M to allow a minimum dimension of 20.5-foot-wide where 24 feet would be required; and
2. Refuse and Recycle Storage Area – A deviation from SDMC § 142.0820(a) and (b) to allow 470 square feet where 960 square feet (864 square feet for residential component and 96 square feet for non-residential component) would be required.

Project incentives and deviations would not result in secondary physical land use impacts that have not already been addressed in the St. Paul's EIR and this Addendum. With the exception of the incentive to reduce the setback, the proposed incentives and deviations involve improvements within the adjacent existing street right-of way and access drive to the project or would occur inside the proposed structure. No significant impacts on the environment would occur as a result of those incentives and deviations. Relative to the incentive to reduce the setback on the north property line



(along Olive Street) from the code requirement of 15 feet to zero feet, allowing for the project to maximize site efficiency and provide for the expanded courtyard between the project and the Cathedral. This reduced setback would not result in an impairment to pedestrian or vehicular movement along this frontage or other effects. Impacts would be less than significant.

The Uptown Community Plan Update established a CPIOZ relative to building heights, which identifies areas within the Uptown community where ministerial approval is granted for proposed development projects with structures that do not exceed 65 feet in height in the Bankers Hill/Park West neighborhood. When a proposed project exceeds 65 feet in height, an SDP is required and may be approved where the proposed project would comply with the applicable regulations of the SDMC and is consistent with the applicable policies in the General Plan and Uptown Community Plan. Because the project exceeds 65 feet in height, an amendment to existing SDP No. 312733 is being processed as one of the project's discretionary actions. With allowable incentives (in the form of deviations) and deviations, the project would be consistent with the applicable regulations of the SDMC and applicable policies of the General Plan and Uptown Community Plan.

The project would not physically divide an established community. The project represents in-fill redevelopment on a developed site that was approved for redevelopment with the St. Paul's Project. The land use and development intensity would be consistent with the goals, policies, and regulations of the General Plan, the updated Uptown Community Plan, and the SDMC. Additionally, because the project site is fully developed, the proposed project would not conflict with any provisions of the City's Multiple Species Conservation Program Subarea Plan, and the project is site is not located on or adjacent to Multi-Habitat Planning Area land. No impacts would result.

The project site is located within the Airport Influence Area for SDIA (Review Area 2), FAA Part 77 Notification Area for SDIA and North Island NAS, and is partially within the AAOZ. The City is required to submit development and building permits within the Airport Influence Area to the SDCRAA, acting as the Airport Land Use Commission (ALUC), for consistency determinations with the SDIA ALUCP prior to project approval. The AAOZ is a City overlay zone which is not a part of the ALUCP. The previously approved St. Paul's project was provided to the SDCRAA for their concurrence with the FAA's no hazard determinations as required by the AAOZ. The 6<sup>th</sup> and Olive site was not in the AAOZ, nor was it in the Airport Influence Area as shown in the 2004 ALUCP. As stated in the SDCRAA's September 2007 letter, the project was not subject to a review by the SDCRAA for a determination of consistency with the adopted SDIA ALUCP.

In 2014, the SDCRAA updated the ALUCP. The 2014 ALUCP expanded the Airport Influence Area and divided it into Review Area 1 and Review Area 2. The 6<sup>th</sup> and Olive project is now within Airport Influence Area - Review Area 2. The SDCRAA's February 2018 letter, which pertains to the proposed project, states:

"ALUC review is required for land use plans and regulations within Review Area 2 proposing increases in height limits and for land use projects that have received from the FAA a Notice of Presumed Hazard, a Determination of Hazard or a Determination of No Hazard subject to conditions, limitations or marking and lighting requirements."



The SDCRAA also noted in its letter that the “proposed building is also located in an area in which the existing terrain penetrates Code of Federal Regulations (CFR) Part 77 surfaces (see Exhibit 4-1 of the SDIA ALUCP). As noted in Policy A.8 of the ALUCP, structures built within this area require that an aviation easement be dedicated to the San Diego County Regional Airport Authority. Notice of this requirement will be included in the ALUC consistency determination letter.”

As required by the ALUC, the City submitted the proposed development to the SDCRAA acting as the ALUC for a consistency determination since it is within Airport Influence Area – Review Area 2 and within the existing terrain penetrating Part 77 surfaces. The FAA No Hazard Determination submitted with the project noted the development was subject to conditions, limitations or marking and lighting requirements. On September 21, 2018, ALUC staff determined the proposed project is conditionally consistent with the SDIA ALUCP subject to the following conditions:

1. The proposed project would be compatible with the ALUCP airspace protection surface, provided that the structure is marked and lighted in accordance with a Determination of No Hazard to Air Navigation issued by the FAA; and
2. An aviation easement for height is recorded with the County Recorder.

Accordingly, the project has been conditioned to require the building to be marked and lit according to FAA procedures and an aviation easement for height be recorded with the County Recorder. The aviation easement would also satisfy the overflight notification requirement.

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

## **Visual Quality/Community Character**

### ***ST. PAUL'S EIR***

The St. Paul's EIR included analysis of impacts that the St. Paul's Project could have on visual effects and neighborhood character in Section 4.2 of the original EIR. The St. Paul's EIR found that project impacts to scenic views from a public viewing area would be less than significant, as existing view corridors along Olive Street, Nutmeg Street, and Sixth Avenue would continue to enable views to and from Balboa Park. Due to the developed, high-rise nature of the urban environment in Park West, there are no opportunities for scenic overlooks into natural areas or San Diego Bay from the project site. Impacts were determined to be less than significant.

Additionally, the St. Paul's EIR concluded that the project would not severely contrast with the surrounding neighborhood character due to height, bulk, architectural style, or building materials in stark contrast to the common theme of adjacent development. The project was found to be consistent with the existing patterns of recent development in an area that contains varied architectural themes and style and was determined to be consistent with the existing zoning of the site. Impacts associated with neighborhood character were found to be less than significant.



Relative to a substantial alteration to the existing or planned character of the area, including the loss of any distinctive or landmark tree(s), or a stand of mature trees, the original 12 queen palms planted in pairs and two additional single plantings along the frontage on Sixth Avenue were considered important landscape features that extend along both sides of Sixth Avenue, from Elm Street near I-5 to Upas Street. These palms are assumed to be among the original queen palms planted around 1915 for the Panama-California Exposition held in Balboa Park during 1915 and 1916. Mitigation Measure HR-2 (see discussion under *Historical Resources*, below) requires that all queen palms that would be affected during construction of the Olive building (i.e., the proposed project) or the Cathedral expansion be boxed and replanted to the satisfaction of the City Street Division-Urban Forestry. In addition, the queen palms not directly affected by construction would be protected by temporary fencing during construction. With implementation of mitigation, impacts were found to be less than significant.

### **PROPOSED PROJECT**

Like the St. Paul's Project, the 6<sup>th</sup> and Olive project would not result in a substantial obstruction of any vista or scenic view from a public viewing area that is identified in the Uptown Community Plan. There are no public viewsheds or public view corridors identified from the project site or on the immediately surrounding streets. No impact would result.

The project would not result in the creation of a negative aesthetic project, nor would it result in project bulk, scale, materials, or style that would be incompatible with the surrounding area. The project site is currently characterized by low-density multifamily apartments, surface parking, and the Cathedral building and administrative offices. The surrounding Park West neighborhood is characterized with an eclectic mix of urban form, architectural styles, and materials. The adjacent building styles range from historic Victorian houses to mid-century bungalows/complexes to modern mid-rises, all of which add to the architectural fabric of the neighborhood.

To the north, the historic Abbey is a unique icon in the neighborhood with its intricate and detailed façade treatments, glass dome, and classic architectural style. The newly constructed modern fourteen story mid-rise, known as "The Park/Bankers Hill," sits in juxtaposition with the classic style of the Abbey. The Park uses a window wall system, large format tile, metal louvers, and a curtain wall system to create a modern appearance.

To the south, historic two-story bungalows and duplexes use painted stucco with color variations of taupe and grey to show the geometric detail of the various building facades. The newly constructed seven story "Vue on 5<sup>th</sup>" has a beige stucco finish that enhances the modern architectural style. The ground level commercial spaces on the Vue on 5<sup>th</sup> use a glazing system that adds transparency to help enhance the pedestrian experience.

To the east is Balboa Park, with views of the historic park and the Tower of Man, farther east.

To the west are commercial buildings, some of which were previously residential homes, and all of which depict various architectural styles from the 1920s to the 1970s. It is evident in many cases that the original façades have been changed to include the use of original brick or the more modern day use of stucco and window wall systems.



Through time, the neighborhood surrounding the project has evolved and so have the architectural style and materials of each new building that is built, creating a unique and diverse architectural make-up of buildings. Where one block may have mid-century duplexes and Victorian homes, another will have something quite different. As a result, the proposed building would add to the ongoing enhancement and development of the neighborhood from low- and mid-rise structures to denser, high-rise development, as have other buildings in the past.

Within the project vicinity, redevelopment has resulted in structures in height up to approximately 14 stories that comprise large portions of the City blocks. As Park West is one of the older neighborhoods close to downtown San Diego, its redevelopment has been ongoing for some time. With its proximity to downtown and other amenities, such as transit and Balboa Park, it is appropriate for Park West to provide critically needed housing supply as outlined in the updated Community Plan. Redevelopment in Park West has become taller and denser in recent years, which allows the project to fit with the fabric of the neighborhood. Projects near the site like Park Laurel (two towers; each 14 stories), Vue on 5<sup>th</sup> (seven stories), The Park/Bankers Hill (14 stories), and the under-construction 41 West (10 stories) are all an effort to meet the growing demand for housing. Since all these projects vary in size, the current project fits within the ever-evolving fabric of the neighborhood.

The project would demolish the existing market rate apartment building, surface parking, and administrative offices and would construct the proposed mixed-use project with 204 multi-family residential units, including 18 affordable units, and Cathedral office space (16,910 gross square feet), with underground parking. The project, although taller than the surrounding buildings, would concentrate development in the northern portion of the site, resulting in an overall slimmer mass with an east-west orientation that is narrower than contemporary redevelopment in the surrounding area. The project was intentionally designed to concentrate the mass on the north portion of the site to maintain views of Balboa Park and create separation from the Cathedral. This separation allows for a 10,600-square-foot courtyard, an amenity for residents of the project and patrons of the Cathedral. Other developments in the area, such as The Park/Bankers Hill and Park Laurel, site 14-story mass in a largely north-south direction, thereby blocking views to Balboa Park and reemphasizing the large structure, which creates an illusion of each development being "heavy" and "bulky."

The project proposes a variety of high-quality materials, finishes and details. Materials on the ground floor provide transparency with floor to ceiling storefront glazing and glass doors at all entries. Columns with stone tile would activate the façade along Fifth Avenue, with the use of stone for base trim. Metal canopies would be provided over entries. Materials on the upper levels would provide transparency with floor to ceiling window wall systems on the exterior of the units; the use of spandrel glass, where appropriate; aluminum mullions; and a glass balcony railing system. Each level would have an exposed slab edge treatment.

The design of the project can be broken up into a bottom, middle, and top sections. The intentional break up of these areas creates a structure that is light in appearance. The materials chosen directly corresponds to the intent of the subject section. The bottom portion of the structure uses columns, stone, and has architectural gestures that give an appearance of a steady base. The middle portion, where the residential units are located, uses a window wall system to allow for transparency in much of the structure. The use of balconies breaks up the façade to enhance the lightness of the



structure. The top section adds an impactful architectural gesture to what has already been expressed in the middle and bottom sections. The tall roof and amenity space add an architectural language that creates a strong, but elegant movement. Together, each section comes together to create a harmoniously-designed building. Given the project's purposeful design, impacts would be less than significant.

The project would not result in a significant change in the existing landform, as the project site is currently fully developed and relatively flat. Park West is an active urban neighborhood within an active urban community. Sources of light are present on-site today and in the project surroundings in the form of building internal and external illumination, street lights, safety lighting in parking areas and along walkways, and vehicle lights. Impacts would be less than significant.

The project would have the same potential impacts to a distinctive stand of trees as the St. Paul's Project. Therefore, the project would require the same Mitigation Measure (HR-2) be implemented to reduce potential impacts 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 St. Paul's EIR. The project would not result in a new significant impact, nor would a substantial increase in the severity of impacts from that described in the St. Paul's EIR occur.

### ***Transportation, Circulation, and Parking***

#### ***ST. PAUL'S EIR***

The St. Paul's EIR analyzed transportation/circulation/parking impacts in Section 4.3. That analysis was based on a *Traffic Impact Analysis* (TIA) prepared by Kimley-Horn and Associates (2010).

A total of 16 intersections and 23 roadway segments were analyzed for impacts under Near-Term (2011) and Horizon Year (2030) conditions of which no significant Near-Term (2011) intersection impacts would result from implementation of the St. Paul's Project. Under Horizon Year (2030) conditions, the St. Paul's Project would increase the delay at the Level of Service (LOS) F intersection at Maple Street and Fifth Avenue by more than the City's threshold of one second and would cause afternoon peak hour (PM) operations at the intersections of Olive Street and Fifth Avenue and at Nutmeg Street and Fifth Avenue to change from LOS D to LOS E. The impacts at those intersections were determined to be significant, requiring implementation of Mitigation Measure TRF-1, which requires a 22.4 percent fair share contribution to installation of a traffic signal at the intersection of Nutmeg Street and Fifth Avenue.

The St. Paul's EIR concluded that the St. Paul's Project would not result in significant Near-Term (2011) impacts on any roadway segments in the study area. Under Horizon Year (2030) conditions, the St. Paul's Project would increase the vehicle to capacity (v/c) ratio on Laurel Street between First and Fourth Avenues by more than the City's threshold of 0.01 for segments operating at LOS F. Thus, the project would have a significant impact along this failing roadway segment. However, this segment of Laurel Street meets all three special conditions established by the City's Development Services Department (DSD) for alternative analysis:



1. The roadway is built to its ultimate classification per the community plan;
2. The intersections on both ends of the failing segment operate at an acceptable LOS; and
3. A Highway Capacity Manual (HCM) arterial analysis indicates an acceptable LOS D or better on the segment for both peak periods in both directions.

As a result of this alternative analysis, this segment this segment was not significantly impacted by the project in the Horizon Year (2030).

Under Horizon Year (2030) conditions, the project would not increase the v/c ratio on Sixth Avenue between Upas and Quince streets, nor on Laurel Street between Fourth and Fifth avenues, by more than the City's threshold of 0.02 for segments operating at LOS E. Thus, the project would have a less than significant impact on these roadway segments. All other roadway segments in the project area would operate at LOS D or better under Horizon Year (2030) conditions.

The EIR concluded therefore that the St. Paul's Project would not have a substantial impact on existing or planned transportation systems or conflict with any adopted policies, plans, or programs supporting alternative transportation, as the project did not propose roadway improvements that would be inconsistent with the City's roadway classifications, or conflict with existing or planned bicycle route designations. Further, the project would maintain the existing bus stop at the northeast corner of Fifth Avenue and Nutmeg Street. Thus, the St. Paul's Project would have less than significant impacts on existing or planned transportation systems or policies, plans, or programs supporting alternative transportation.

### **PROPOSED PROJECT**

A *Transportation Impact Analysis* was prepared for the proposed 6<sup>th</sup> and Olive project by Kimley-Horn (September 2018). The TIA evaluated the potential off-site traffic impacts associated with the proposed project under the following six scenarios:

- Existing Conditions
- Existing Conditions Plus Project
- Near Term (2021) Conditions
- Near Term (2021) Conditions Plus Project
- Horizon Year (2035) Conditions
- Horizon Year (2035) Conditions Plus Project

The study area was determined primarily based on the previous study area defined in the St. Paul's EIR and adjusted slightly to account for Olive Street intersections and roadway segments near the project site. Freeway ramps and segments are not included in the study area, consistent with the analysis performed in the St. Paul's EIR traffic study. A total of 15 existing intersections, one proposed intersection (at the project driveway), and 23 roadway segments were included as part of the study area for the current project.

Based on the City's *Trip Generation Manual*, and as shown in Table 3, *Driveway Trip Generation Summary*, the project is expected to generate a total of 1,478 daily trips with 108 morning peak-hour trips (28 in, 80 out) and 130 afternoon peak-hour trips (87 in, 43 out). The resulting net trip



generation on the network (proposed minus existing) would equal a total of 1,307 daily trips with 97 morning peak-hour trips (24 in, 73 out) and 115 afternoon peak-hour trips (78 in, 37 out).

**Table 3. Driveway Trip Generation Summary**

Land Use	Units <sup>1</sup>	Trip Rate <sup>2</sup>	Daily Trips	AM Peak-Hour					PM Peak-Hour				
				% of ADT <sup>2</sup>	In:Out Ratio <sup>2</sup>	In	Out	Total	% of ADT <sup>2</sup>	In:Out Ratio <sup>2</sup>	In	Out	Total
Driveway Trips <sup>3</sup>													
<b>Proposed</b>													
Multiple Dwelling Unit - Over 20 dwelling units/acres	204 du	6/du	1,224	8%	2 : 8	20	78	98	9%	7 : 3	77	33	110
House of Worship - General	16.910 ksf	15/ksf	254	4%	8 : 2	8	2	10	8%	5 : 5	10	10	20
<b>Proposed Total</b>			<b>1,478</b>			<b>28</b>	<b>80</b>	<b>108</b>			<b>87</b>	<b>43</b>	<b>130</b>
<b>Existing</b>													
Multiple Dwelling Unit - Over 20 dwelling units/acres	16 du	6/du	96	8%	2 : 8	2	6	8	9%	7 : 3	6	3	9
House of Worship - General	4.973 ksf	15/ksf	75	4%	8 : 2	2	1	3	8%	5 : 5	3	3	6
<b>Proposed Total</b>			<b>171</b>			<b>4</b>	<b>7</b>	<b>11</b>			<b>9</b>	<b>6</b>	<b>15</b>
<b>NET TRIP GENERATION</b>			<b>1,307</b>			<b>24</b>	<b>73</b>	<b>97</b>			<b>78</b>	<b>37</b>	<b>115</b>
Note: <sup>1</sup> du = dwelling units; ksf = thousand square feet <sup>2</sup> Trip rates referenced from the City of San Diego land Development Code – Trip Generation Manual, May 2003. <sup>3</sup> Driveway trips are the total number of trips generated by a site.													

### Impact Analysis

All intersections in the project study area currently operate at LOS C or better during both peak periods, and all roadway segments within the study area function at LOS D or better under existing conditions, except the segment of Sixth Avenue between Laurel Street and Kalmia Street, which operates at LOS E. When traffic associated with the project is added to existing traffic, all intersections within the study area are expected to operate at LOS D or better. Similarly, all roadway segments within the study area are expected to operate at LOS D or better with the addition of the proposed project traffic, except the segment of Sixth Avenue between Laurel Street and Kalmia Street that would continue to operate at LOS E. No direct significant impacts to the roadway segments in the study area as a result of the proposed project were found under existing conditions.

Under Near-Term (2021) conditions, all intersections within the study area are expected to operate at LOS C or better, and all roadway segments within the study area function at LOS D or better, except the segment of Sixth Avenue between Laurel Street and Kalmia Street which is expected to operate at LOS E in the near term. When project traffic is added to the study area under Near-Term conditions, all intersections within the study area are expected to continue to operate at LOS D or better, and all study roadway segments are expected to continue to operate at LOS D or better, except the segment of Sixth Avenue between Laurel Street and Kalmia Street which is expected to operate at LOS E. No direct significant impacts to the roadway segments in the study area as a result of the proposed project were found under Near-Term (2021) conditions.



In the Horizon Year (2035), all intersections within the study area are expected to operate at LOS D or better, and all roadway segments within the study area are expected to operate at LOS D or better, except the segments of Sixth Avenue between Upas Street and Quince Street and between Laurel Street and Kalmia Street, both of which are expected to operate at LOS E. When the project traffic is added to the network in the Horizon Year (2035), study roadway segments are expected to operate at LOS D or better with the addition of the proposed project, except the segments of Sixth Avenue between Upas Street and Quince Street and between Laurel Street and Kalmia Street, which are expected to operate at LOS E. The increase in volume-to-capacity from project traffic for these two roadway segments is 0.02 or less, which is the significance threshold for roadways operating at LOS E. Therefore, no significant cumulative impacts to the roadway segments in the study area as a result of the proposed project are expected in the Horizon Year (2035) conditions.

With the addition of traffic from the proposed project, all intersections within the study area are expected to operate at LOS D or better, except for the intersection of Fifth Avenue and Maple Street, which is expected to operate at LOS E during the PM peak period. This project would therefore have a significant cumulative impact at this intersection. This impact is consistent with the findings of the St. Paul's EIR. Mitigation of the project impact would consist of a 22.4 percent fair share payment towards installation of a traffic signal at the intersection of Nutmeg Street and Fifth Avenue, defined as part of the St. Paul's Project approval, and due prior to issuance of the first building permit.

As noted, the project would be required to implement the mitigation measures recommended in the St. Paul's EIR. Therefore, with implementation of the project-specific MMRP, as detailed in Section VII of this Addendum, potential 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 St. Paul's EIR. The project would not result in a new significant impact, nor would a substantial increase in the severity of impacts from that described in the St. Paul's EIR occur.

#### Parking

Per section 142.0525 through section 142.0530 of the City of San Diego's Municipal Code and applying the affordable housing parking requirements, the project would be required to provide at least 214 automobile parking spaces, including six carpool/zero emissions vehicles, eight total handicap spaces and two van accessible handicap spaces, 25 motorcycle spaces, and 101 bicycle spaces. However, the project would provide 348 automobile parking spaces, including six carpool/zero emissions vehicles, 10 total handicap spaces and three van accessible handicap spaces, 25 motorcycle spaces, and 116 proposed bicycle spaces. The project would provide adequate parking in accordance with City requirements.

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



## ***Air Quality***

### ***ST. PAUL'S EIR***

The St. Paul's EIR evaluated impacts to Air Quality in Section 4.4. The St. Paul's EIR found that the project does not conflict with or obstruct the applicable air quality plan. The residential density of the St. Paul's Project and population associated with that project is accounted for in the City's General Plan. San Diego Air Pollution Control District (SDAPCD) refers to approved general plans to forecast, inventory, and allocate regional emissions from land use and development-related sources. Therefore, emissions associated with the St. Paul's land uses at the project site were accounted for when developing emission projections for the Regional Air Quality Strategy (RAQS). The project was found to be consistent with the RAQS, and air quality impacts would be less than significant.

The St. Paul's EIR concluded that the project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation. Neither the net increase in emissions nor the project's gross operational emissions would exceed the significance thresholds for criteria air pollutants. Relative to the project's potential to expose sensitive receptors to substantial pollutant concentrations including air toxics and diesel particulates, the emissions of criteria air pollutants during construction and operation of the project were found to be below the City's significance criteria; impacts were less than significant.

Impacts relative to the threshold not to exceed 100 pounds per day of Particulate Matter (PM) dust were identified as short-term, less than significant impacts due to PM<sub>10</sub> and PM<sub>2.5</sub> emissions from grading activities. Impacts relative to objectionable odors were also less than significant, because the project was found to not have the potential to generate objectionable odors affecting a substantial number of people.

### ***PROPOSED PROJECT***

An *Air Quality Technical Report* was prepared by Scientific Resources Associated (September 17, 2018) for the project. The following discussion is a brief summary of the analysis and conclusions of the technical study.

#### **Construction Impacts**

Emissions from the construction of the project were estimated using the CalEEMod Model (SCAQMD 2016), Version 2016.3.2. Construction for the project would be conducted in a single phase and would require approximately 24 months to complete. The grading phase of construction would include 58,500 cubic yards of excavation and export of material. Emissions from truck trips associated with export of material are calculated by the CalEEMod model based on the amount exported.

Table 4, *Estimated Maximum Daily Construction Emissions*, provides the detailed construction emission estimates associated with the proposed project. As shown in Table 4, emissions of criteria pollutants during construction would be below the thresholds of significance for all project construction phases for all pollutants. Project criteria pollutant emissions during construction would be temporary and are less than significant.



**Table 4. Estimated Maximum Daily Construction Emissions**

<b>Emission Source</b>	<b>ROG</b>	<b>NOx</b>	<b>CO</b>	<b>SO<sub>2</sub></b>	<b>PM<sub>10</sub></b>	<b>PM<sub>2.5</sub></b>
<i>Demolition</i>						
Fugitive Dust	--	--	--	--	0.28	0.04
Offroad Equipment	2.30	22.68	14.89	0.02	1.29	1.20
Onroad Emissions	0.03	0.99	0.21	0.003	0.06	0.02
Worker Trips	0.05	0.04	0.40	0.001	0.11	0.03
<b>Subtotal</b>	<b>2.38</b>	<b>23.71</b>	<b>15.50</b>	<b>0.02</b>	<b>1.74</b>	<b>1.29</b>
Significance Criteria	137	250	550	250	100	55
<i>Significant?</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>
<i>Grading</i>						
Fugitive Dust	--	--	--	--	1.81	0.97
Offroad Equipment	1.42	16.04	6.61	0.01	0.74	0.68
Onroad Emissions	0.74	25.54	5.51	0.07	1.58	0.50
Worker Trips	0.03	0.02	0.25	0.00	0.07	0.02
<b>Subtotal</b>	<b>2.19</b>	<b>41.60</b>	<b>12.37</b>	<b>0.08</b>	<b>4.20</b>	<b>2.17</b>
Significance Criteria	137	250	550	250	100	55
<i>Significant?</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>
<i>Paving/Foundations</i>						
Offroad Equipment	0.09	9.17	8.90	0.02	0.52	0.48
Worker Trips	0.05	0.04	0.40	0.001	0.11	0.03
<b>Subtotal</b>	<b>0.95</b>	<b>9.21</b>	<b>9.30</b>	<b>0.02</b>	<b>0.63</b>	<b>0.51</b>
Significance Criteria	137	250	550	250	100	55
<i>Significant?</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>
<i>Building Construction</i>						
Offroad Equipment	2.27	15.98	13.49	0.02	0.92	0.88
Vendor Trips	0.23	6.08	1.57	0.01	0.37	0.14
Worker Trips	0.84	0.59	6.62	0.02	1.77	0.48
<b>Subtotal</b>	<b>3.34</b>	<b>22.65</b>	<b>21.68</b>	<b>0.05</b>	<b>3.06</b>	<b>1.50</b>
Significance Criteria	137	250	550	250	100	55
<i>Significant?</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>
<i>Architectural Coatings Application</i>						
Architectural Coatings	6.82	--	--	--	--	--
Offroad Equipment	0.24	1.68	1.83	0.003	0.11	0.11
Worker Trips	0.16	0.11	1.22	0.004	0.26	0.10
<b>Subtotal</b>	<b>7.22</b>	<b>1.79</b>	<b>3.05</b>	<b>0.01</b>	<b>0.37</b>	<b>0.21</b>
Significance Criteria	137	250	550	250	100	55
<i>Significant?</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>
<b>Maximum Daily Emissions<sup>a</sup></b>	<b>11.10</b>	<b>41.60</b>	<b>32.96</b>	<b>0.08</b>	<b>4.19</b>	<b>2.17</b>
Significance Criteria	137	250	550	250	100	55
<i>Significant?</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>

<sup>a</sup> Maximum emissions of criteria pollutants occur during building construction, paving, and architectural coating application.



### Operational Impacts

Operational impacts associated with the development of the project would include impacts associated with vehicular traffic, as well as area sources such as energy use, landscaping, consumer products use, and architectural coatings use for maintenance purposes. Trip generation rates were based on the *Transportation Impact Analysis* (Kimley-Horn and Associates, 2018). Operational impacts were estimated using the CalEEMod Model, Version 2016.3.2.

Table 5, *Estimated Operational Emissions*, presents the results of the emission calculations, in pounds per day (lbs/day), for the project. Based on the estimated emissions associated with project operations, the emissions of all criteria pollutants are below the significance thresholds for the project. Impacts would be less than significant.

**Table 5. Estimated Operational Emissions**

	ROG	NOx	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
<i>Maximum Daily Emissions</i>						
Summer Day, Lbs/day						
Area Sources	5.76	0.19	16.80	0.001	0.09	0.09
Energy Use	0.05	0.47	0.24	0.003	0.04	0.04
Vehicular Emissions	2.28	8.72	22.95	0.07	5.77	1.59
<b>TOTAL</b>	<b>8.09</b>	<b>9.39</b>	<b>39.98</b>	<b>0.08</b>	<b>5.90</b>	<b>1.72</b>
Significance Criteria	137	250	550	250	100	55
<i>Significant?</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>
Winter Day, Lbs/day						
Area Sources	5.76	0.19	16.80	0.001	0.09	0.09
Energy Use	0.05	0.47	0.24	0.003	0.04	0.04
Vehicular Emissions	2.21	8.93	23.12	0.07	5.78	1.59
<b>TOTAL</b>	<b>8.03</b>	<b>9.60</b>	<b>40.16</b>	<b>0.07</b>	<b>5.91</b>	<b>1.72</b>
Significance Criteria	137	250	550	250	100	55
<i>Significant?</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>

### CO Hot Spots

Projects involving traffic impacts may result in the formation of locally high concentrations of CO, known as CO "hot spots." To verify that the project would not cause or contribute to a violation of the CO standard, a screening evaluation of the potential for CO "hot spots" was conducted. 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* (Kimley-Horn and Associates 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 17 intersections in the study area. Based on the results of the Transportation Impact Analysis, no significant impacts were predicted at study area intersections for the Existing plus Project or Near Term plus Project scenarios.

For the Horizon Year, the Transportation Impact Analysis indicated that significant delay and/or degradation in LOS to LOS E or F would occur at one intersection:

- Fifth Avenue and Maple Street



As discussed in the *Transportation Impact Analysis*, the above-listed intersection is a stop-controlled intersection. Installation of traffic signals would mitigate the project-related impacts and improve intersection operation to LOS D or better at all impacted intersections. The *Transportation Impact Analysis* indicated that the project would contribute its fair share to the installation of this traffic signal at the impacted intersection. With mitigation, the project's impacts to traffic would be less than significant, and no CO "hot spots" would result.

It is important to note that the SDAPCD has ceased ambient air quality monitoring for CO at the majority of its monitoring stations throughout the region. The concentrations of CO have steadily decreased due to more stringent vehicle emission standards for CO. Accordingly, it is not anticipated that CO "hot spots" would be an issue in the future.

### Sensitive Receptors

#### *Carbon Monoxide*

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

#### *Toxic Air Contaminants*

The threshold concerns whether the project could expose sensitive receptors to substantial pollutant concentrations of toxic air contaminants (TACs). If a project has the potential to result in emissions of any TAC which result in a cancer risk of greater than ten in one million or substantial non-cancer risk, the project would be deemed to have a potentially significant impact. Air quality regulators typically define sensitive receptors as schools (Preschool-12<sup>th</sup> Grade), hospitals, resident care facilities, or day-care centers, or other facilities that may house individuals with health conditions that would be adversely impacted by changes in air quality. Residential land uses may also be considered sensitive receptors. The site is currently surrounded by existing commercial and mixed uses, including residential buildings.

Emissions of TACs are attributable to temporary emissions from construction emissions, and minor emissions associated with diesel truck traffic used for deliveries at the site. Truck traffic may result in emissions of diesel particulate matter, which is characterized by the State of California as a TAC. Certain types of projects are recommended to be evaluated for impacts associated with TACs. In accordance with the SCAQMD's "Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis" (SCAQMD 2003), projects that should be evaluated for diesel particulate emissions include truck stops, distribution centers, warehouses, and transit centers which diesel vehicles would utilize and which would be sources of diesel particulate matter from heavy-duty diesel trucks. The project would not attract a disproportionate amount of diesel trucks and would not be considered a source of TAC emissions. Based on the CalEEMod Model, heavy-duty diesel trucks would account for only 0.9 percent of the total trips associated with the project. Impacts to sensitive receptors from TAC emissions would therefore be less than significant.



#### Other Criteria Pollutants

Because emissions of all criteria pollutants are below the thresholds set forth in the City's Significance Determination Thresholds, the project would not expose sensitive receptors to substantial pollutant concentrations and impacts from other criteria pollutants would be less than significant.

#### Odors

Project construction could result in minor amounts of odor compounds associated with diesel heavy equipment exhaust. These compounds would be emitted in various amounts and at various locations during construction. Sensitive receptors located near the construction site include the residences to the south of the site. Odors are highest near the source and would quickly dissipate offsite; any odors associated with construction would be temporary.

The project would not be considered a source of objectionable odors during operations. Thus, the potential for odor impacts associated with the project for both construction and operations is less than significant.

#### Regional Air Quality Standards (RAQS) Consistency

The State Implementation Plan (SIP) is the document that sets forth the State's strategies for attaining and maintaining the National Ambient Air Quality Standard (NAAQS). The SDAPCD is responsible for developing the San Diego portion of the SIP, and has developed an attainment plan for attaining the 8-hour NAAQS for ozone (O<sub>3</sub>). The RAQS sets forth the plans and programs designed to meet the state air quality standards. Through the RAQS and SIP planning processes, the SDAPCD adopts rules, regulations, and programs designed to achieve attainment of the ambient air quality standards and maintain air quality in the San Diego Air Basin (SDAB).

Conformance with the RAQS and SIP determines whether a project will conflict with or obstruct implementation of the applicable air quality plans. Because the California Air Resources Board (CARB) mobile source emission projections and San Diego Association of Governments (SANDAG) growth projections are based on population and vehicle trends and land use plans developed by the City of San Diego as part of the development of General Plans, projects that propose development that is consistent with the growth anticipated by the General Plan would be consistent with the RAQS and SIP. If a project would propose development which is less dense than anticipated within the General Plan, the project would likewise be consistent with the RAQS and SIP.

The project proposes to replace existing office and housing uses with a mixed-use development. The project would develop under the existing zone and land use designations; therefore, a Rezone and Community Plan Amendment would not be required. Accordingly, as with the original St. Paul's Project, the project is consistent with the City's General Plan and would therefore be consistent with the RAQS and SIP. The project would not conflict with or obstruct implementation of the RAQS or SIP, and would not result in a significant impact.

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



## **Historical Resources**

### **ST. PAUL'S EIR**

The St. Paul's EIR evaluated impacts to historical resources in Section 4.5. The analysis conducted by a City archaeological specialist did not reveal the presence of any known archaeological sites within or adjacent to the St. Paul's Project site. However, due to the extent of existing development and surface disturbance of the site, it was infeasible to conduct archaeological surveys to confirm the presences or absence of resources at the time the St. Paul's EIR was certified. Therefore, The St. Paul's EIR found that due to the known presence of archaeological resources in the project area, the site is presumed to have the potential for on-site resources that could be impacted by the planned excavation to construct the residential and commercial buildings associated with the original project. The St. Paul's EIR concluded that archaeological resources, if present on-site, could be substantially damaged or destroyed during the excavation of subterranean parking garages. Damage or destruction of archaeological resources would be a significant project impact, requiring implementation of Mitigation Measure AR-1, which requires monitoring during grading activities. Implementation of Mitigation Measure AR-1 would reduce impacts to below a level of significance.

Relative to historic resources, plans for the improvements to the Cathedral as submitted to City Plan-Historic staff were determined to comply with the Secretary of the Interior's Standards and did not result in a significant adverse impact to historical resources. However, any deviation from the plans reviewed by City Plan-Historic staff could result in a significant impact to a historic resource, which would result in the need to implement Mitigation Measure HR-1. Implementation of Mitigation Measure HR-1, calling for review of construction plans and demolition plans for the Cathedral demonstrating consistency with the approved project and conformance with the U.S. Secretary of the Interior's Standards for Treatment of Historic Properties and related guidelines, would reduce impacts to below a level of significance.

The original twelve queen palms planted in pairs and two additional single plantings along the St. Paul's Project frontage on Sixth Avenue represent an important part of landscape history due to the age of the trees and their association with an important figure in the community's landscape development. They are also noteworthy because of their association with landscape improvements made for the Panama-California Exposition held in Balboa Park during 1915 and 1916. The original St. Paul's EIR determined that nine queen palms would be directly impacted by redevelopment of the 6<sup>th</sup> and Olive project site and four queen palms would be impacted by the Cathedral expansion. One queen palm at the southeast corner of the Cathedral would not be impacted. Destruction or alteration of the historic queen palms landscape element would be a significant impact of the St. Paul's Project. Mitigation Measures HR-2.1 and HR-2.2, pertaining to the treatment and protection of the queen palms, were determined to be required to mitigate potential impacts to below a level of significance.

The St. Paul's Project was determined to have no impact to religious or sacred uses and would not interfere with religious or sacred uses. Additionally, there was no evidence that indicated the possible presence of human remains. If human remains were encountered during excavation, the impact would be fully mitigated in accordance with Mitigation Measure AR-1.



## **PROPOSED PROJECT**

### Built Environment

The project would result in the same potential impact to the queen palms along Sixth Avenue as was identified in the original St. Paul's EIR. However, since the St. Paul's Project was approved, two of the fourteen total queen palm trees planted along the St' Paul's Project Sixth Avenue frontage have died and have been removed. Of the remaining twelve trees, seven queen palms would be directly impacted by construction of the proposed project. As concluded in the original St. Paul's EIR, destruction or alteration of the historic queen palms landscape element would be a significant project impact. The project, therefore, is required to implement Mitigation Measures HR-2.1 and HR-2.2.

The project would result in the removal of three queen palms for construction. Pursuant to the requirements of Mitigation Measure HR-2.1, any existing queen palms that would be removed for project construction will be boxed for replanting. If any of the existing palms fail to survive after replanting, the subject palm will be replaced with a queen palm with a minimum of 20-foot brown trunk height in locations consistent with the Sixth Avenue streetscape and to the satisfaction of the City Street Division-Urban Forestry. Implementation of Mitigation Measure HR-2.1 would ensure that project impacts relative to the removal of queen palms are mitigated in accordance with the St. Paul's EIR.

The project would protect four palms in-place during construction. Mitigation Measure HR-2.2 requires that, in the event that any queen palms that are to be protected in-place from damage during construction are subsequently damaged due to construction, to the extent that a Registered Arborist determines that they should be removed, the applicant shall be responsible for replacement of the palms in accordance with Mitigation Measure HR-2.1. Mitigation Measures HR-2.2 calls for the planting of two additional palms for each damaged palm along the Sixth Avenue frontage or elsewhere in Balboa Park, at a location identified by the City Street Division-Urban Forestry. Implementation of Mitigation Measure HR-2.2 will ensure that project impacts to protected palms would be mitigated in accordance with the St. Paul's EIR.

Therefore, because the project would implement the same mitigation measures required for the St. Paul's EIR, the project's impacts to queen palms with regard to their noteworthy relevance in the past history of the area is reduced to below a level of significance.

### Archaeology

The project is located within an area identified as sensitive on the City of San Diego Historical Resources Sensitivity Maps. In addition, qualified City staff conducted a records search 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 this information, there is a potential for buried cultural resources to be impacted through ground-disturbing activities associated with the project. Potential impacts relative to archaeological resources would be the same as with the St. Paul's Project. Archaeological resources, if present on-site, could be substantially damaged or destroyed during ground-disturbing activities. Damage or destruction of archaeological resources would be a significant project impact, requiring implementation of Mitigation Measure AR-1 of the St. Paul's EIR. The project would be required to implement mitigation measures as presented in the St. Paul's EIR associated with historical



resources. Therefore, with implementation of the project-specific MMRP, as detailed in Section VII of this Addendum, potential 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 St. Paul's EIR. The project would not result in a new significant impact, nor would a substantial increase in the severity of impacts from that described in the St. Paul's EIR occur.

## **Noise**

### **ST. PAUL'S EIR**

The St. Paul's EIR evaluated potential impacts from noise in Section 4.6. The St. Paul's EIR found that project would result in temporary and permanent noise impacts associated with construction of two multi-story buildings, the Cathedral expansion, an outdoor courtyard, and underground parking areas. Construction activities associated with improvements at the project site were concluded to generate short-term, temporary, and intermittent noise at or near individual noise-sensitive locations in the project area. The nearest noise-sensitive land uses were multi-family residential units located in the same block as the Nutmeg Site on Sixth Avenue, between Nutmeg Street and Maple Street. Noise generated by short-term construction activities is estimated to generate an average maximum noise level of 85 A-weighted decibels (dBA) equivalent continuous sound level (Leq) per hour at the nearest off-site receptor, which would exceed ambient noise levels by more than 10 dBA and, therefore, would be a significant project noise impact, resulting in the need for Mitigation Measures NOI-1a and NOI-1b. Implementation of those mitigation measures would reduce impacts to below a level of significance.

Relative to a permanent increase in ambient noise levels, noise from project-related traffic would increase area noise levels by 2 dBA community noise equivalent level (CNEL) or less under existing and future conditions. Noise increases from parking facilities would be underground and less than 3 dBA. Increase in ambient noise impacts would be less than significant. Noise generated by stationary heating, ventilation, and air conditioning (HVAC) systems could increase ambient noise levels at adjacent sensitive receptors by more than 3 dBA and, therefore, would be a significant noise impact associated with the St. Paul's Project, resulting in the need for Mitigation Measure NOI-2. Implementation of Mitigation Measure NOI-2 would reduce impacts to below a level of significance.

Relative to exposure of people to current or future transportation noise levels that exceed standards established in the Noise Element of the General Plan, traffic noise prediction for year 2030 noise levels on the project's balconies would range from 50 to 58 dBA CNEL, and other outdoor use areas would be 44 to 67 dBA CNEL. All exterior noise conditions for residential, office, commercial, and places of worship would comply with thresholds established by the City CEQA significance determination thresholds applicable at the time the EIR was certified. Typical exterior glazing for a residential building would provide an approximate 20-dBA noise reduction from exterior to interior. The project would install a glazing assembly with a sound transfer class (STC)-28 or greater rating, which would provide greater than the standard noise reduction. Therefore, the project would achieve the City interior noise standard of 45 dBA CNEL, and impacts would be less than significant.



Relative to development that would result in land uses that are not compatible with aircraft noise levels as defined by an adopted Airport Land Use Compatibility Plan (ALUCP), the project site is not within the ALUCP 60 dBA CNEL noise contours and, therefore, would not expose sensitive receptors to noise levels more than applicable standards. Impacts would be less than significant.

### **PROPOSED PROJECT**

A *Noise Study* was prepared for the 6<sup>th</sup> and Olive project by Birdseye Consulting Group (August 2018). The following discussion is a brief summary of the analysis and conclusions of the technical study.

The project area is in the urbanized Park West neighborhood within the Uptown community of the City. Thus, the most common and primary sources of noise in the project site vicinity are motor vehicles (e.g., automobiles and trucks) on Fifth and Sixth Avenues and on Olive Street to the north and Nutmeg Street to the south. The project site located on the northwest corner of Fifth Avenue and Olive Street and wraps around the block extending mid-block adjacent to the Sixth Avenue. Most existing and project-related noise would be caused by traffic noise. Traffic noise is of concern because where a high number of individual events occur, it can create a sustained noise level. Other noise sources in the area are primarily associated with pedestrian activity; however, these sources do not noticeably contribute to the ambient noise environment.

#### Construction Noise

The main sources of noise during construction activities would include heavy machinery used during clearing the site, as well as equipment used for construction. Average noise levels associated with the use of heavy equipment at construction sites could range from about 81 to 95 dBA at 25 feet from the source, depending upon the types of equipment in operation at any given time and phase of construction.

The City limits the average sound level from construction noise to 75 decibels at any property zoned residential during the 12-hour period from 7:00 a.m. to 7:00 p.m. Nearby sensitive receptors are multifamily residences located along Olive Street north of the site, along 5<sup>th</sup> Avenue on the block north of the site, and southwest of the site across 5<sup>th</sup> Avenue. St. Paul's Cathedral is located adjacent to and west/south of the site. Balboa Park is located across 6th Avenue to the east. The project will also be a sensitive receptor at completion. The distance from the center of the site to the closest receiver (north side of Olive Street) is approximately 120 feet. It is assumed demolition, grading, and site preparation work would require the use of heavy equipment. Building construction and finishing would utilize hand tools; however, equipment would also be required to deliver materials to the project site and work areas.

Based on U.S. Environmental Protection Agency (EPA) noise emissions, empirical data, and the amount of equipment needed for construction of the proposed project, worst-case noise levels from the construction equipment would occur during demolition and grading activities. The anticipated equipment used on-site would include a dozer, backhoe/tractor, and a grader. Due to size of the site and related physical constraints and normal site preparation operations, the equipment would be spread out over the site and would only be used for specific operations. Based upon the site plan, the construction operations would occur near the northern property line (approximately 50 feet to the nearest receptor), while other operations could occur as far as 170 feet from the same property



line along the west side of the site. This would result in an average distance of 110 feet from the center of the construction operations to the property lines.

#### *Demolition Noise*

Not all equipment would operate continuously over the 12-hour period from 7:00 a.m. to 7:00 p.m. Equipment would be used on an as-needed basis depending on the activity. For example, cut saws would be used to weaken structural components of the buildings and then an excavator would be used to remove that section of the structure. A loader would then be used to place the debris into the haul trucks. Noise levels from the demolition activities could reach short-term peak levels exceeding of 90 dBA but would be periodic, rather than constant. Based on empirical data referenced from other noise studies, the worst-case hourly construction noise level was found to be 80.8 dBA Leq at an average distance of 25 feet (Ldn Consulting 2016). The daily, or eight-hour average, was measured to be 76 dBA at a distance of 25 feet. This results from the phased use of equipment. Assuming this work occurs on the exterior of the building near the middle of the site, the distance to the nearest receiver would be approximately 50 feet from the receiver. Assuming a reference level of 76 dBA at 25 feet and a 6 dBA decrease per doubling of distance, the average noise level over an 8-hour period would be approximately 70 dBA. This would be within the acceptable limits required by the City. Additionally, implementation of Mitigation Measures NOI-1a and NOI-1b would minimize construction noise levels, including those associated with demolition.

#### *Construction Noise Levels*

The project site is 0.37 acre in size, which limits the amount and type of equipment that can operate on the site at any one time. If during site preparation and grading, a bobcat tractor (78 dBA), a backhoe (78 dBA), and a dump truck (82 dBA) were working simultaneously generally in the center of the site over an eight-hour work day, the eight-hour Leq would be approximately 85 dBA at 50 feet. This would exceed the 75-dBA average at the sensitive properties located east of the site. As noted above, there are additional sensitive receptors (multi-family residential to the north, west, and southwest; Balboa Park to the east; and St. Paul's Cathedral to the south). Noise levels at these receptors would not exceed the 75-dBA average. As shown in Table 6, *Typical Maximum Construction Noise Levels at Various Distances from Project Construction*, noise levels at 100 feet or more from the active construction site would attenuate to below the 75-dBA threshold. Additionally, implementation of Mitigation Measures NOI-1a and NOI-1b would minimize construction noise levels. No construction noise impacts are anticipated.

**Table 6. Typical Maximum Construction Noise Levels at Various Distances from Project Construction**

<b>Distance from Construction</b>	<b>Maximum Noise Level at Receptor (dBA)</b>
25 feet	88
50 feet	85
100 feet	72
250 feet	66
500 feet	60
1,000 feet	54



### *Temporary Construction-Related Vibration*

Activities associated with residential facilities do not generate vibration. Thus, this discussion focuses on temporary vibration caused by construction. As referenced, the closest multifamily residences to the site are located along the north side of Olive Street approximately 50 feet from the northern property line. Based on the information presented in Table 7, *Vibration Source Levels for Construction Equipment*, vibration levels from operation of a loaded truck or bulldozer bobcat/backhoe would attenuate to 87 VdB or less at 25 feet. As discussed below, 95 VdB is the threshold where minor damage can occur in fragile buildings. Vibration levels are projected to be under this threshold; thus, structural damage is not expected to occur as a result of construction activities associated with the project.

**Table 7. Vibration Source Levels for Construction Equipment**

Equipment	Approximate VdB				
	25 feet	50 feet	60 feet	75 feet	100 feet
Large Bulldozer	87	81	79	77	75
Loaded Trucks	86	80	78	76	74
Jackhammer	79	73	71	69	67
Small Bulldozer	58	52	50	48	46

As referenced, 72 VdB is the vibration threshold for residences and/or buildings where people sleep. Table 6 shows construction equipment, with the exception of a small bulldozer, could exceed 72 VdB at varying distances across the site. Construction activities would occur during daytime hours which would minimize sleep disturbance. To minimize vibration impacts, small dozers and similar equipment would be used in proximity to receivers to the north of the site. Construction activities that cause vibration would be temporary; however, they may be perceptible at adjacent receivers. Implementation of Mitigation Measure NOI-1a would minimize vibration associated with construction. Temporary vibration impacts would be less than significant.

### Operational Noise Impacts

Long-term operation of the project was evaluated for potential exterior traffic related impacts caused by increased traffic volumes associated with the project, as well as interior noise levels caused by traffic. In addition, a discussion regarding potential noise levels associated with roof top HVAC is provided.

### *Exterior Traffic Noise*

Traffic is the primary noise source that would be generated by the proposed project. Existing measured noise levels in the project area are lower than the residential standard. As referenced, the highest measured noise level is 64.0 dBA at the southwest corner of Nutmeg Street and Fifth Avenue (Site 2). Measured noise levels at Site 1 (Olive Street and Sixth Avenue) (63.7 dBA) are not noticeably different than Site 2; thus, ambient conditions in the project area currently meet City standards.

Traffic volumes for peak hour existing and project operation were obtained from the Transportation Impact Assessment (Kimley-Horn and Associates, 2018). Evening (PM) peak hour project trips for existing conditions were modeled to determine baseline noise conditions. Project trips were then added to the baseline trips to determine whether the Leq at neighboring receivers would noticeably change or exceed 65 dBA as a result of project-related traffic.



As referenced, the project would generate approximately 1,478 Average Daily Trips, 108 AM peak hour trips (28 in and 80 out) and 130 PM peak hour trips (87 in and 43 out) (Kimley-Horn and Associates, 2018). Noise levels were calculated at the following receivers and are intended to represent conditions at multiple receivers within proximity to these locations:

- Multifamily residences at southeast corner of Nutmeg Street and Fifth Avenue;
- Multifamily Residences at northwest corner of Olive Street and Sixth Avenue;
- Vue Condominiums at 4029 Fifth Avenue (west side fronts Fifth Avenue);
- Project residences located near southeast corner of Olive Street and Fifth Avenue; and
- Project residences located mid-block along Sixth Avenue between Olive and Nutmeg Streets.

As shown in Table 8, *Modeled Noise Levels*, the evening peak hour Leq exceeds the 65-dBA standard at four of the six receptor site locations modeled under baseline conditions. The highest existing noise level is at Receptor Site 1. This receiver is located at the southeast corner of Fifth Avenue and Nutmeg Street. Traffic departing northbound from the stop-controlled intersection contributes to the higher modeled noise level at this location. To cause a significant noise impact, project-related traffic would have to cause the existing Leq at one or more receivers to exceed the 65-dBA standard or increase by three or more dBA. As shown in Table 8, traffic associated with the project would have the greatest effect at Receptor Site 1; however, the increase would be less than one dBA. Similarly, noise levels at all the other receivers would be less than three dBA. Therefore, impacts would be less than significant.

**Table 8. Modeled Noise Levels**

Receptor	Existing Leq	Exceed Standard?	With Project Leq	dBA Change	Significant Impact?
Site 1	68.7	Yes	69.1	+0.4	No
Site 2	66.9	Yes	67.2	+0.3	No
Site 3	64.7	No	65.0	+0.2	No
Site 4	64.7	No	64.9	+0.2	No
Site 5	67.7	Yes	67.8	+0.1	No
Site 6	67.1	Yes	67.2	+0.1	No

#### *Exterior Use Noise (HVAC)*

The HVAC system proposed for use on the site has not been specified and noise levels vary depending on the system size. However, it is assumed that one or more HVAC compressor units would be installed on the roof-top of the proposed building. HVAC noise levels can be expected to range from 60 to 70 dBA at five feet from the roof top equipment and ventilation openings (Illingsworth & Rodkin, 2011). Assuming HVAC units are installed at the center of the roof-top, or approximately 100 feet south of the closest receivers (Receptor Site 2 2), a 70-dBA reference noise level would attenuate to 52 dBA at 40 feet from the source. HVAC noise would be less than the 65 dBA criteria at the project property line. Additionally, implementation of Mitigation Measure NOI-2 would ensure that design and installation of stationary noise sources for the project complies with the City of San Diego Noise Ordinance.



### *Interior Traffic Noise*

California Energy Code Title 24 standards specify construction methods and materials that result in energy efficient structures and up to a 30-dBA reduction in exterior noise levels (assuming windows are closed). This includes operation of mechanical ventilation (e.g. heating and air conditioning), in combination with standard building construction that includes dual-glazed windows with a minimum Sound Transmission Class (STC) rating of 26 or higher. When windows are open, the insertion loss drops to about 10 dBA. Assuming windows are closed, interior noise levels at residences along Olive Street (i.e., the proposed project and Receptor Site 2) would be approximately 37 dBA and less at receivers located along Fifth Avenue. This would be below the 45 dBA interior standard. In all cases modeled, the existing interior noise levels would not noticeably change with the addition of project traffic.

### *Airport Land Use Compatibility Plan Compatibility*

The SDIA is located approximately one mile southwest of the project site. Based on the noise contour maps provided in the ALUCP (County of San Diego County, 2014) the project site is located outside the 60 dBA CNEL contour; nevertheless, airport noise may be audible at this location. Compatibility with the adopted ALUCP was addressed in the St. Paul's EIR. As required by the ALUC, the City submitted the proposed development to SDCRAA acting as the ALUC for a consistency determination since it is within Airport Influence Area – Review Area 2. On September 21, 2018, ALUC staff determined the proposed project is conditionally consistent with the SDIA ALUCP subject to conditions outlined in the Land Use discussion.

The project would be required to implement mitigation measures as presented in the St. Paul's EIR associated with construction and stationary noise sources. Therefore, with implementation of the project-specific MMRP, as detailed in Section VII of this Addendum, potential 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 St. Paul's EIR. The project would not result in a new significant impact, nor would a substantial increase in the severity of impacts from those described in the St. Paul's EIR occur.

### ***Paleontological Resources***

#### ***ST. PAUL'S EIR***

Paleontological resources were analyzed in Section 4.7 of the St. Paul's EIR. Direct impacts to paleontological resources can occur through the destruction or alteration of a paleontological resource or site by grading, excavation, trenching, boring, tunneling, or other activity that disturbs the subsurface geologic formation. Excavation operations are the most common ways for paleontological resources to be adversely impacted and can result in the permanent loss of resources and valuable information. Typically, a project that would grade more than 2,000 cubic yards at a depth of cut of ten feet or more in a moderate-sensitivity rated area would have the potential to encounter paleontological resources during grading.



The St. Paul's EIR disclosed that the project would require approximately 58,000 cubic yards of grading to a depth of approximately 43 feet associated with the Olive Site. The site is underlain by Very Old Paralic Deposit (formerly known as Lindavista formation), which has a high-sensitivity rating and consists of silty fine to medium sand, within one to four feet below grade and would continue to a depth of 20 or more feet below grade. Paleontological resources, if present on-site, could be substantially damaged or destroyed during grading activities. Therefore, a potential impact to paleontological resource was identified, resulting in the need to implement Mitigation Measure PR-1, which requires monitoring during grading activities, to reduce impacts to below a level of significance.

### **PROPOSED PROJECT**

The project site is underlain by Very Old Paralic Deposit (Lindavista formation), that has a high sensitivity rating for paleontological resources.

This project proposes approximately 58,500 cubic yards of grading with a cut depth of 60.8 feet; therefore, the project could result in significant impacts to paleontological resources. Consequently, paleontological monitoring would be required during all grading and/or excavation activities.

Therefore, the project would require implementation of Mitigation Measure PR-1 as disclosed in the EIR. Therefore, with implementation of the project-specific MMRP, as detailed in Section VI of this Addendum, potential 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 St. Paul's EIR. The project would not result in a new significant impact, nor would a substantial increase in the severity of impacts from that described in the St. Paul's EIR occur.

### **Light/Glare/Shade**

#### **ST. PAUL'S EIR**

SDMC Section 142.0730 specifies that no more than "50% of the exterior of a building may be comprised of reflective material that has a light reflectivity factor greater than 30%." The glazing for the two mixed-use buildings would be composed of architectural glass products with reflectivity factors of 11 and 12 percent. Therefore, the St. Paul's EIR determined that the project would comply with the SDMC limitation on use of reflective material and the project impact would be less than significant.

A shadow study was conducted for the St. Paul's Project, which simulated shadows that would be cast by the proposed buildings during the spring equinox (March 21), summer solstice (June 21), fall equinox (September 21), and winter solstice (December 21) at 9:00 a.m., 12:00 p.m., and 3:00 p.m. Shadows cast on December 21 would be the longest shadows and would be directed primarily toward the businesses and residences on the west side of Fifth Avenue and the north side of Olive Street. None of the adjacent structures would be shaded for the entire day during the winter solstice period when shadows would be the longest. A portion of the 3:00 p.m. shadows on September 21 and December 21 would also be cast on the apartment building at the northwest corner of Olive Street and Sixth Avenue. Residential buildings on Sixth Avenue south of Nutmeg Street would be



shadowed between 3:00 p.m. and sundown throughout the year. Shade would also be cast on a portion of the Balboa Park open lawn area to the west. This area is frequently used for picnicking, sunbathing, and other passive uses, as well as occasional more active informal group recreation and public gatherings.

Project buildings evaluated in the St. Paul's EIR were determined to cast shadows onto adjacent buildings to the west and north of the project site. No solar collectors or outdoor recreation areas are evident in aerial photographs of the adjacent properties to the west and north, apart from a private swimming pool on property at the southeast corner of Fourth Avenue and Olive Street. Shadows onto the pool area would only occur from the building proposed on Nutmeg Street during the winter morning hours. The shadow study showed that, while there is a potential for some shading of other properties, the timing and duration of shading would not preclude solar use on nearby properties.

Shading onto Balboa Park associated with the St. Paul's Project would only occur during the afternoons, with the greatest area of shading impact occurring during the December solstice. Due to the latitude of San Diego being north of the tropic of cancer, the arc of the shadow across Balboa Park would stop as the sun begins to set and would not continue much farther southward after 3:00 p.m. on December 21. Due to the expansive lawn area in the portion of Balboa Park across from the St. Paul's Project, opportunities for utilizing the park would not be substantially reduced by shadows cast during the fall and winter afternoons in that there would be other areas that are exposed to the sun. Other typical activities in this portion of Balboa Park involve informal sports, which would not be impacted by shadows cast by the buildings proposed as part of the St. Paul's Project.

The impact of the St. Paul's Project relative to shades/shadow would be less than significant in that shadows would not substantially reduce access to sunlight for solar collectors or recreation.

### **PROPOSED PROJECT**

SDMC Section 142.0730 specifies that no more than "50% of the exterior of a building may be comprised of reflective material that has a light reflectivity factor greater than 30%." The glazing for the 6<sup>th</sup> and Olive building would be composed of architectural glass products with a reflectivity factor of 19 percent. Therefore, the project would comply with the SDMC limitation on the use of reflective material. Impacts would be less than significant.

A shadow study comparing the approved St. Paul's Project and the proposed project was conducted by JWDA (June 2018). The shadow study simulated shadows that would be cast by the proposed buildings during the equinox (March 21, September 21), summer solstice (June 21), and winter solstice (December 21) at 9:00 a.m., 12:00 p.m., and 3:00 p.m. Shadows cast on December 21 would result in the longest shadows, directed primarily toward the businesses and residences on the west side of Fifth Avenue and the north side of Olive Street at 9:00 a.m. and to the northeast across Balboa Park at 3:00 p.m. None of the adjacent structures would be shaded for the more than six hours during the winter solstice period when shadows would be the longest. A portion of the 3:00 p.m. shadows during the equinox and winter solstice would also be cast on the apartment building at the northwest corner of Olive Street and Sixth Avenue.



The 6<sup>th</sup> and Olive building would cast shadows onto adjacent buildings to the west and north of the project site. No solar collectors or outdoor recreation areas are evident in aerial photographs of the adjacent properties to the west and north, apart from a private swimming pool on property at the southeast corner of Fourth Avenue and Olive Street. Shadows onto the pool area would not occur from the project. The shadow study showed that, while there is a potential for some shading of other properties, the timing and duration of shading would not preclude solar use on nearby properties.

Shading onto Balboa Park associated with the project would only occur during the afternoons, with the greatest area of shading impact occurring during the winter solstice. Due to the latitude of San Diego being north of the tropic of cancer, the arc of the shadow across Balboa Park would stop as the sun begins to set and would not continue much farther southward after 3:00 p.m. on December 21. Due to the expansive lawn area in the portion of Balboa Park across from the project, opportunities for utilizing the park would not be substantially reduced by shadows cast during the winter afternoons in that there would be other areas that are exposed to the sun. Typical activities in this portion of Balboa Park involve informal sports, which would not be impacted by shadows cast by the project.

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

### ***Public Services and Facilities***

#### ***ST. PAUL'S EIR***

The St. Paul's EIR analyzed impacts to public services and facilities in Section 4.9 and concluded that less than significant impacts would occur.

#### Police Services

As it relates to police protection, while average police response times would increase slightly with implementation of the St. Paul's Project, no new facilities or improvements to existing facilities would be required as a result of the project. Furthermore, development impact fees would be required prior to building permit issuance, which would be used to maintain as well as fund future facilities. Therefore, the St. Paul's Project would not result in the need for new or physically altered police protection facilities and would have a less than significant impact on police services.

#### Fire Protection

While average fire response times could increase slightly, the St. Paul's Project's impact to fire and emergency service response times would be negligible and would not cause the average response time to exceed the city-wide standard of acceptable service. No new facilities or improvements to existing facilities would be required as a result of the project. Furthermore, Development Impact Fees (DIFs) would be required prior to building permit issuance, which would be used to maintain as well as fund future facilities.



### Schools

The St. Paul's Project would generate approximately 161 new residents, nine of whom could be younger than 18 years of age and would be served by the San Diego Unified School District (SDUSD). The St. Paul's Project would not result in a significant impact on schools in the project area, and any students generated by the project could be accommodated within the existing neighborhood schools without new or modified facilities. Furthermore, the St. Paul's Project would be required to comply with the requirements of Government Code Section 65996. Therefore, the St. Paul's Project would not result in the need for a new school or services and would have a less than significant impact on school services.

### Libraries

Current branch library facilities serving the project area do not meet the City standard of 15,000 square feet, the number of volumes per capita at the branches meets the City standard. The St. Paul's EIR identified that the proposed new Mission Hills-Hillcrest Branch Library would meet the City facility size standard and that the Central Library is also conveniently located for use by future residents and would be accessible by public transit. Though an existing library facility deficiency exists in the project area, the proposed addition of approximately 161 new residents resulting from the St. Paul's Project would not in itself result in a need for new or modified library services or facilities. Furthermore, the payment of DIFs would be required as a condition of project approval. Therefore, the project would have a less than significant impact on library services.

### Parks and Recreation Facilities

With the addition of approximately 161 new residents, the St. Paul's Project would contribute to the existing deficiency of parks in the community as identified in the St. Paul's EIR. However, the increased park and recreational demand associated with the St. Paul's Project was not considered significant. The payment of park was required as a condition of St. Paul's Project approval. Therefore, the St. Paul's Project would have a less than significant impact on parks and recreational facilities.

## ***PROPOSED PROJECT***

### Police Services

The project would introduce additional residents at the site. New residents would likely reside locally or regionally and would already be included in the projected City population figures in the area. Although, the project could result in increases in service calls, no new facilities or improvements to existing facilities would be required as a result of the project. Ongoing funding for police services is provided by the City General Fund. No new facilities or improvements to existing facilities would be required. Furthermore, DIFs would be paid prior to building permit issuance, which would be used to maintain as well as fund future facilities. Therefore, no new or expanded facilities would be required as a result of the project.

### Fire Protection

The project would result in additional residents to the site which would increase the demand for fire protection within the service area. The project would be constructed per applicable fire codes and comply with applicable City regulations. The project would provide such provisions such as the installation of sprinkler systems in all occupied buildings. The project would not conflict with the Uptown Community Plan in terms of number, size, and location of existing or planned Fire-Rescue



facilities. The Fire-Rescue Department has facilities and staffing in the project area to adequately serve the project. Although, the project could result in increases in service calls, no new facilities or improvements to existing facilities would be required as a result of the project. Furthermore, DIFs would be paid prior to building permit issuance, which would be used to maintain as well as fund future facilities. Therefore, no new or expanded facilities would be required as a result of the project.

#### Schools

Correspondence with SDUSD was undertaken for the project (July 18, 2018). According to SDUSD, the following schools provide service for the project site:

**Table 9. Schools Serving the Project Site**

School	Address	Estimated Program Capacity	2017-18 Enrollment	2018-19 Projected Enrollment
Florence Elementary	3914 1 <sup>st</sup> Avenue San Diego, CA 92103	302	244	244
Roosevelt Middle	3366 Park Boulevard San Diego, CA 92103	1,435	986	988
San Diego High	1405 Park Boulevard San Diego, CA 92101	2,981	2,458	2,505

Florence Elementary has six portable and 12 permanent classrooms. Roosevelt Middle has 16 portable and 42 permanent classrooms. San Diego High has eight portable and 119 permanent classrooms. SDUSD has no identified deficiencies at these schools at this time.

There are no SDUSD standard rates to estimate the number of students generated by new residential development. Student generation rates vary based on the type of project, number of units, bedroom mix, neighborhood, perceived quality of assigned schools, and other factors. SDUSD typically references existing residential development of similar size in the same neighborhood as the proposed project to determine the number of students that would be generated by a development project. However, there are no recent multi-family residential developments of similar size to the proposed project in the vicinity that generate meaningful student enrollment. While there is much existing housing of the multi-family type, most multi-family developments in the vicinity are smaller than the proposed project, so they are not comparable for this purpose. Therefore, SDUSD demographers look to more distant developments in order to capture meaningful student generation figures for large, recently-built multi-family projects.

The referenced multi-family developments include Vantage Pointe Apartments in Cortez Hill (679 units; total K-12 student generation: 25; total student generation rate: 0.038 students/unit), Pinnacle at the Park Apartments in East Village (484 units; total K-12 student generation: 18; total student generation rate: 0.037 students/unit), Presidio View Apartments in Mission Valley (350 units; total K-12 student generation: 11; total student generation rate: 0.031 students/unit), Circa 37 Apartments in Mission Valley (306 units; total K-12 student generation: 14; total student generation rate: 0.046 students/unit), and West Park Apartments in Mission Valley (612 units; total K-12 student generation: 10; total student generation rate: 0.016 students/unit). Based on this information, proposed student generation rates for the project are shown below. The student generation rates are the average from the existing development, with a low and high range.



**Table 10. Estimated Student Generation for 6<sup>th</sup> and Olive**

Number of Units	Estimated Student Generation Rate	Estimated Number of Students
204	K-5: 0.020-0.040	K-5: 4-8
	6-8: 0.004-0.009	6-8: 1-2
	9-12: 0.009-0.018	9-12: 2-4
	<b>K-12: 0.033-0.067</b>	<b>K-12: 7-14</b>

Based on the estimated student generation, the project would generate approximately seven to 14 students. Based on these generation rates, the existing schools have sufficient capacity in the near term to serve these students, and the project would not result in the need for new or expanded school facilities. The SDUSD identified the potential for schools in the area to meet or exceed their capacity in the cumulative condition. Per Government Code §65996, however, by law, the payment of standard school fees constitutes full mitigation of any project impact. Therefore, impacts would be less than significant.

#### Libraries

The project would result in approximately 355 residents, based on the American Community Survey forecast from SANDAG (2017) of 1.53 persons per multi-family household in Uptown. Even with the population increase projected to be generated by the project, existing library systems would not be impaired, nor would additional or expanded library facilities be required. Because residents may use the central library or any branch library that is part of the San Diego Public Library system, the existing branches could adequately serve the increase in residents from the project and no new or altered facilities would be required. Furthermore, DIFs would be required prior to building permit issuance. Impacts would be less than significant.

#### Parks and Recreation

The General Plan's Recreation Element establishes a minimum standard of 2.8 acres per 1,000 people for population-based parks, which can be achieved through a combination of neighborhood and community park acreages and park equivalencies. The most recent SANDAG household population estimates are as of March 2017 and include a household population of 41,192 residents in Uptown. This existing population estimate requires about approximately 115.34 acres of population-based parks in Uptown. There are an estimated 14.32 acres of usable parks population-based parkland in Uptown, resulting in a deficiency of approximately 101.02 of usable acres of population-based parks.

The Series 13 SANDAG 2050 Forecast estimates a household population of 55,135 residents in Uptown. The 2050 forecast requires approximately 154.38 acres of population-based parks in Uptown. There are an estimated 14.32 acres of existing population-based parkland and 38.18 acres of future parks in Uptown, resulting in a future deficiency of approximately 101.88 of usable acres of population-based parks.

The General Plan standard for population-based recreation facilities is one 17,000 square foot Recreation Center for every 25,000 residents and one Aquatic Complex for every 50,000 residents. The existing population estimates in the Uptown Community require approximately 28,011 square feet of Recreation Centers and approximately 0.82 Aquatic Complexes. There are currently no existing Recreation Centers and no existing Aquatic Complexes in Uptown. The 2050 forecast requires approximately 37,492 square feet of Recreation Centers and 1.10 Aquatic Complexes.



There are no existing Recreation Centers and approximately 40,032 square feet of future recreation centers identified in the Uptown community resulting in a future surplus of 2,540 square feet. There are no existing Aquatic Complexes and approximately 1.18 future Aquatic Complexes resulting in a future surplus of 0.08 Aquatic Complexes.

The project would result in approximately 355 residents, which would require 1.52 acres of population-based parkland contributing to the existing deficiency of parks in the community. The park portion of the current per-unit DIFs to be paid at the time of building permit issuance provides for public facilities required to support the proposed population including the population-based park usable acreage, recreation centers, and aquatic complexes.

The project includes on-site private residential recreational amenities, in the form of a 2,225-square-foot fitness center and 750-square-foot terrace on the fifth floor of the building; a 2,615-square-foot lounge and 2,615-square-foot terrace on the twentieth floor, which would include a pool, lounge area, and indoor kitchen; and the 10,600-square-foot courtyard on the ground level. Although private recreational amenities do not satisfy population-based park requirements, they do provide recreational opportunities for the project's residents.

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

### ***Solid Waste Disposal***

#### ***ST. PAUL'S EIR***

The St. Paul's EIR concluded that the project would have a potentially significant solid waste disposal impact during construction, based on the threshold of a project with 50 or more proposed dwelling units per the City's Significance Determination Thresholds (City of San Diego, 2007). Accordingly, a Waste Management Plan (WMP) was prepared for the St. Paul's Project. Following construction, the St. Paul's Project would be required to comply with the regulations in SDMC Section 66.0706, Recycling Requirements for Residential Facilities Serviced by a Franchisee, which specifies requirements for recycling services and occupant education. Thus, with implementation of the WMP and compliance with SDMC Section 66.0606 and Section 66.0706, the St. Paul's Project was found to have a less than significant direct impact to solid waste disposal services. The St. Paul's Project's contribution to cumulative solid waste disposal impacts is addressed in Section 7.3.1 of the St. Paul's EIR and mitigation measures are identified to reduce cumulative project solid waste impacts to less than significant.

#### ***PROPOSED PROJECT***

The project would have the potential to result in impacts to solid waste.

The City has established a threshold of 40,000 square feet of development as generating sufficient waste (60 tons) to have a potentially cumulatively significant impact on solid waste services. Any future project that meets this threshold is required to prepare and comply with a project-specific Waste Management Plan (WMP). As such, a project specific WMP (KLR Planning, March 2018) was



prepared for the project that identified waste anticipated to be generated; material/type and amount of waste anticipated to be diverted; project features that would reduce the amount of waste generated; project features that would divert or limit the generation of waste; source separation techniques for waste generated; how materials would be reused on-site; and the name and location of recycling, reuse, or landfill facilities where waste would be taken.

With implementation of the strategies outlined in the project-specific WMP, as well as compliance with all applicable City ordinances with allowable deviations to the Refuse and Recyclable Storage Standards, solid waste impacts related to collection, diversion, and disposal of waste generated from construction and demolition, grading, and occupancy would be less than significant. During occupancy, an ongoing WMP would include provisions to provide adequate exterior storage space for refuse, recyclable, and landscape/green waste materials. Thus, impacts would be less than significant. Overall, with the preparation and implementation of the project-specific WMP as a condition of project approval, cumulative impacts related to solid waste would be less than significant.

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

### ***Energy Conservation***

#### ***ST. PAUL'S EIR***

The St. Paul's EIR analyzed energy conservation in Section 4.11 and concluded that increased energy usage would require additional energy supplies to meet increasing demand. Sources would continue to be the same sources that supplied energy at the time the EIR was certified. The St. Paul's Project represented a long-term increase of 1.5 megawatt-hour (mWh) a year, which would be an increase of approximately 0.007 percent in the overall existing demand. This small increase did not represent a significant increase in electricity usage, and it was within SDG&E's capabilities to provide it without additional infrastructure. Therefore, the St. Paul's Project would not require the construction of additional electrical generation capacity.

The project's natural gas usage was estimated to be approximately 6,085,141 cubic feet per year, equivalent to approximately 62,928 therms. The St. Paul's Project would use approximately 0.01 percent of the current natural gas use within the County. This small increase in natural gas use did not represent a significant increase in natural gas usage and is within SDG&E capabilities to provide it without additional infrastructure. Therefore, the St. Paul's Project would not require the construction of additional natural gas storage or distribution facility capacity to accommodate the project.

#### ***PROPOSED PROJECT***

The direct energy analysis includes the potential for increased energy consumed by fossil-fuel powered vehicles associated with the project, as well as the energy consumed during construction (see Table 11, *Energy Consumption Summary*). A discussion of VMT is a component of the direct energy analysis because VMT can infer energy consumption. The fuel usage for this analysis is



estimated based on the average mile per gallon for San Diego County taken from the annual fleet averages for San Diego County developed for the EMFAC2014 model and multiplied by the total VMT estimated for the proposed project as part of the air quality analysis. This approach incorporates all future fuel efficiency developments in fuel carbon content, fuel economy, and fuel technology as estimated by the ARB for use in developing regional air quality plans. Construction-related energy consumption directly attributable to the proposed project is primarily related to the fuel consumption associated with equipment operation. Fuel consumption is estimated using fuel usage from OFFROAD by activity and horsepower rating. For purposes of this analysis, the average fuel consumption rate for all construction equipment is one gallon per hour per 15 horsepower (HP).

**Table 11. Energy Consumption Summary**

Source	Existing Entitlement	Proposed Entitlement
<b>Construction*</b>		
Equipment - hp	1,183,196	1,183,196
Equipment - gallons	78,880	78,880
Vehicles - VMT	13,913,106	13,913,106
Vehicles - gallons	2,319,657	2,319,657
<b>Operation</b>		
Vehicles - VMT	2,783,705	5,136,299
Vehicles - gallons	101,699	187,647
Electricity, MWH/yr	841	1,363
Natural Gas, MMBTU/yr	1,316	2,288
Water Treatment/Conveyance - million gallons	19	33
Water Treatment/Conveyance - MW	251	433

Most of the energy used during construction would be in the form of gasoline- and diesel-powered construction and transportation equipment, including trucks, bulldozers, front-end loaders, forklifts, and cranes. Other equipment includes construction lighting, field services (office trailers), and electrically driven equipment such as pumps and other tools. Secondary energy users, which produce the construction material required to build the proposed project, also represent a portion of the construction energy demand.

Based on the air quality analysis modeling, demolition, grading, and construction of the proposed project would require a total of approximately 1,183,196 HP hours of activity. Based on an average fuel consumption rate of one gallon per hour per 15 HP, heavy construction equipment would consume approximately 78,880 gallons of fuel. Construction workers, materials deliveries, and soil and debris export would generate approximately 13,913,106 VMT over the life of the proposed project. Based on the average gallons per VMT for the various vehicle classes from the EMFAC2014 model for San Diego County, this would consume approximately 2,319,657 gallons of fuel. The energy consumption associated with construction activities would not result in local energy demand exceeding the capacity of SDG&E and gasoline/diesel fuel suppliers.

Fuel consumption associated with building operation would be primarily related to vehicle use by residents, patrons, and employees. Based on the air quality analysis, the total VMT for the project is 5,136,299. To estimate the fuel used, gallons per VMT was developed based on EMFAC2014 and the total reported VMT and total fuel consumed for San Diego County for 2019, which resulted in an average of 27.37 miles per gallon of fuel. Based on this consumption factor, 5,136,2199 VMT is projected to consume approximately 187,647 gallons annually.



Electricity and natural gas usage amounts were obtained from the CalEEMod model. The project would consume a total of 1,363 MW of electricity and 2,288 MMBTU of natural gas annually.

Water conveyance and treatment in California requires substantial amounts of energy. Based on the CalEEMod Model outputs, the project would consume a total of 33 million gallons of water annually.

To convey and treat water in Southern California requires an average of 13,021 kW per million gallons. Thus, water conveyance and treatment for the proposed project would result in an annual electricity consumption of approximately 433 mW per year.

A typical dwelling unit is estimated to consume approximately 4,012 cubic feet of natural gas per month, while commercial offices and retail are estimated to consume 2.0 and 2.9 gallons per square-foot per month, respectively. For purposes of calculating natural gas consumption, the renovated portion of the Cathedral is considered commercial office. Based on the proposed uses, operation of the proposed buildings and improvements are estimated to consume 6,085,141 cubic feet of natural gas per year.

Although operation of the proposed project would result in the consumption of energy, several aspects of the proposed project would help manage the amount and efficiency of energy consumption and would ensure that energy consumption is not inefficient, wasteful, unnecessary, or place a significant demand on regional energy supplies. Consistent with Title 24 building standards, a number of energy reduction and efficiency measures are being incorporated into the proposed project to reduce energy consumption and would use many of the best energy reduction and efficiency measures available.

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

### ***Greenhouse Gas Emissions***

#### ***ST. PAUL'S EIR***

The St. Paul's EIR analyzed impacts associated with greenhouse gas (GHG) emissions in Section 4.12. The St. Paul's Project would exceed the 900 MT CO<sub>2</sub>e/yr interim screening criteria and would, therefore, be required to reduce emissions by 28.3 percent per the City's memorandum, Addressing Greenhouse Gas Emissions from Projects Subject to CEQA (City of San Diego, August 2010). Specific GHG reduction measures were identified for implementation by the St. Paul's Project to improve energy efficiency, water conservation, and incentives for alternative modes of transportation. Application of these, along with reduction achieved through Statewide reduction measures associated with the AB 32 Scoping Plan, would reduce the project's net change in operational from 2,136 MT CO<sub>2</sub>e/yr to 1,306 MT CO<sub>2</sub>e/yr, which would be a reduction of 830 MT CO<sub>2</sub>e/yr, or 34.3 percent. Design measures are identified in Section 4.12.3 of the St. Paul's EIR. With implementation of the project design features, GHG impacts associated with the St. Paul's Project would be less than significant.



## **PROPOSED PROJECT**

In the time following the certification of the St. Paul's EIR, the City adopted a Climate Action Plan (CAP) in December 2015 that outlines the actions that the City will undertake to achieve its proportional share of State GHG emission reductions. The City has identified the following five CAP strategies to reduce GHG emissions to achieve the 2020 and 2035 targets: (1) energy- and water-efficient buildings; (2) clean and renewable energy; (3) bicycling, walking, transit, and land use; (4) zero waste (gas and waste management); and (5) climate resiliency. The City's CAP Consistency Checklist, adopted July 12, 2016, is the primary document used by the City to ensure project-by-project consistency with the underlying assumptions in the CAP and thereby to ensure that the City would achieve the emission reduction targets identified in its CAP.

The CAP Consistency Checklist includes a three-step process to determine if the project would result in a GHG impact. Step 1 consists of an evaluation to determine the project's consistency with existing General Plan, Community Plan, and zoning designations for the site. Step 2 consists of an evaluation of the project's design features compliance with the CAP strategies. Step 3 is only applicable if a project is not consistent with the land use and/or zone, but is also in a transit priority area to allow for more intensive development than assumed in the CAP.

Under Step 1 of the CAP Consistency Checklist, the project is consistent with the existing General Plan and Community Plan designations, as well as 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. 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 St. Paul's EIR and City's CAP Consistency Checklist the project's contribution of GHGs to cumulative statewide emissions would be less than cumulatively considerable. Therefore, the project's cumulative GHG emissions would have a less than significant impact on the environment.

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

## **VI. ISSUES NOT ANALYZED IN THE PREVIOUS EIR**

CEQA Guidelines, Section 15128, allows environmental issues for which there is no likelihood of a significant impact to not be "discussed in detail or analyzed further in the EIR. The certified St. Paul's EIR determined the St. Paul's Project would have a less than significant impacts to Hydrology/Drainage, Water Quality, Geology and Soils, Health and Public Safety, Population and Housing, Public Utilities, Agricultural Resources, Biological Resources, and Mineral Resources. Revisions to the project components evaluated under the St. Paul's EIR are proposed with the



current project. Through the environmental analysis conducted, the City has determined that the current project, subject of and analyzed 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 a new significant impact.

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

The project shall be required to comply with the applicable mitigation measures outlined within the Mitigation Monitoring and Reporting Program (MMRP) of the previously certified St. Paul's EIR (PTS No. 96101/SCH No. 2009101036) and those identified with the project-specific subsequent technical studies. The following MMRP identifies measures that specifically apply to this project.

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

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

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

1. **PRECONSTRUCTION MEETING IS REQUIRED TEN (10) WORKING DAYS PRIOR TO BEGINNING ANY WORK ON THIS PROJECT.** The PERMIT



HOLDER/OWNER is responsible to arrange and perform this meeting by contacting the CITY RESIDENT ENGINEER (RE) of the Field Engineering Division and City staff from MITIGATION MONITORING COORDINATION (MMC). Attendees must also include the Permit holder's Representative(s), Job Site Superintendent and the following consultants: ***Qualified Acoustical Monitor, Qualified Paleontological Monitor.***

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

CONTACT INFORMATION:

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

- 2. **MMRP COMPLIANCE:** This Project, Project Tracking System (PTS) No. 591198 and/or Environmental Document No. 591198, 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: ***Not Applicable***
- 4. **MONITORING EXHIBITS :** All consultants are required to submit, to RE and MMC, a monitoring exhibit on a 11x17 reduction of the appropriate construction plan, such as site plan, grading, landscape, etc., marked to clearly show the specific areas including the **LIMIT OF WORK**, scope of that discipline's work, and notes indicating when in the construction schedule that work will be performed. When necessary for clarification, a detailed methodology of how the work will be performed shall be included.



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

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

**Document Submittal/Inspection Checklist**

<b>Issue Area</b>	<b>Document Submittal</b>	<b>Associated Inspection/Approvals/Notes</b>
General	Consultant Qualification Letters	Prior to Preconstruction Meeting
General	Consultant Construction Monitoring Exhibits	Prior to or at Preconstruction Meeting
Transportation/ Circulation/Parking	Traffic Reports	Traffic Features Site Observation
Historical Resources (archaeology)	Records Search/Monitoring Report(s)	Monitoring Report(s) Approval
Historical Resources (built environment) / Landscape	Tree Protection Arborist Verification	Tree Protect Fence Inspection
Noise	Acoustical Reports	Noise Mitigation Features Inspection
Paleontological Resources	Paleontology Reports	Paleontology Site Observation
Bond Release	Request for Bond Release Letter	Final MMRP Inspections Prior to Bond Release Letter

**C. SPECIFIC MMRP ISSUE AREA CONDITIONS/REQUIREMENTS**

**Transportation/Circulation/Parking**

**Mitigation Measure TRF-1:** Prior to issuance of any building permit for construction of either of the Olive Site or Nutmeg Site structures, the Owner/Permittee shall pay to the City the project's fair share (22.4 percent) of the cost for installation of a traffic signal at the Nutmeg Street and Fifth Avenue intersection.



## **Historical Resources (Archaeology)**

### **Mitigation Measure AR-1:**

#### **I. Prior to Permit Issuance or Bid Opening/Bid Award**

##### **A. Entitlements Plan Check**

1. Prior to permit issuance or Bid Opening/Bid Award, whichever is applicable, the Assistant Deputy Director (ADD) Environmental designee shall verify that the requirements for Archaeological Monitoring and Native American monitoring have been noted on the applicable construction documents through the plan check process.

##### **B. Letters of Qualification have been submitted to ADD**

1. Prior to Bid Award, the applicant shall submit a letter of verification to Mitigation Monitoring Coordination (MMC) identifying the Principal Investigator (PI) for the project and the names of all persons involved in the archaeological monitoring program, as defined in the City of San Diego Historical Resources Guidelines (HRG). If applicable, individuals involved in the archaeological monitoring program must have completed the 40-hour HAZWOPER training with certification documentation.
2. MMC will provide a letter to the applicant confirming the qualifications of the PI and all persons involved in the archaeological monitoring of the project meet the qualifications established in the HRG.
3. Prior to the start of work, the applicant must obtain written approval from MMC for any personnel changes associated with the monitoring program.

#### **II. Prior to Start of Construction**

##### **A. Verification of Records Search**

1. The PI shall provide verification to MMC that a site specific records search (1/4 mile radius) has been completed. Verification includes, but is not limited to a copy of a confirmation letter from South Coastal Information Center, 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.
3. The PI may submit a detailed letter to MMC requesting a reduction to the ¼ mile radius.

##### **B. PI Shall Attend Precon Meetings**

1. Prior to beginning any work that requires monitoring; the Applicant shall arrange a Precon Meeting that shall include the PI, Native American consultant/monitor (where Native American resources may be impacted), Construction Manager (CM) and/or Grading Contractor, Resident Engineer (RE), Building Inspector (BI), if appropriate, and MMC. The qualified Archaeologist and Native American Monitor shall



attend any grading/excavation related Precon Meetings to make comments and/or suggestions concerning the Archaeological Monitoring program with the Construction Manager 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. Acknowledgement of Responsibility for Curation (CIP or Other Public Projects)

The applicant shall submit a letter to MMC acknowledging their responsibility for the cost of curation associated with all phases of the archaeological monitoring program.

3. Identify Areas to be Monitored
  - a. Prior to the start of any work that requires monitoring, the PI shall submit an Archaeological Monitoring Exhibit (AME) (with verification that the AME has been reviewed and approved by the Native American consultant/monitor when Native American resources may be impacted) based on the appropriate construction documents (reduced to 11x17) to MMC identifying the areas to be monitored including the delineation of grading/excavation limits.
  - b. The AME shall be based on the results of a site specific records search as well as information regarding the age of existing pipelines, laterals and associated appurtenances and/or any known soil conditions (native or formation).
  - c. MMC shall notify the PI that the AME has been approved.

4. 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 age of existing pipe to be replaced, depth of excavation and/or site graded to bedrock, etc., which may reduce or increase the potential for resources to be present.

5. Approval of AME and Construction Schedule  
After approval of the AME by MMC, the PI shall submit to MMC written authorization of the AME and Construction Schedule from the CM.

### **III. During Construction**

- A. Monitor Shall be Present During Grading/Excavation/Trenching



1. The Archaeological Monitor shall be present full-time during all soil disturbing and grading/excavation/trenching activities which could result in impacts to archaeological resources as identified on the AME. **The Construction Manager 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 AME.**
  2. The Native American consultant/monitor shall determine the extent of their presence during soil disturbing and grading/excavation/trenching activities based on the AME and provide that information to the PI and MMC. If prehistoric resources are encountered during the Native American consultant/monitor's absence, work shall stop and the Discovery Notification Process detailed in Section III.B-C and IV.A-D shall commence.
  3. The PI may submit a detailed letter to MMC during construction requesting a modification to the monitoring program when a field condition such as modern disturbance post-dating the previous grading/trenching activities, presence of fossil formations, or when native soils are encountered that may reduce or increase the potential for resources to be present.
  4. The archaeological and Native American consultant/monitor shall document field activity via the Consultant Site Visit Record (CSVSR). The CSVSR's 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 Archaeological Monitor shall direct the contractor to temporarily divert all soil disturbing activities, including but not limited to digging, trenching, excavating or grading activities in the area of discovery and in the area reasonably suspected to overlay adjacent resources 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.
  4. No soil shall be exported off-site until a determination can be made regarding the significance of the resource specifically if Native American resources are encountered.
- C. Determination of Significance
1. The PI and Native American consultant/monitor, where Native American resources are discovered shall evaluate the significance of the resource. If Human Remains are involved, follow protocol in Section IV below.



- 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.
  - b. If the resource is significant, the PI shall submit an Archaeological Data Recovery Program (ADRP) and obtain written approval of the program from MMC, CM and RE. ADRP and any mitigation must be approved by MMC, RE and/or CM before ground disturbing activities in the area of discovery will be allowed to resume. **Note: If a unique archaeological site is also an historical resource as defined in CEQA Section 15064.5, then the limits on the amount(s) that a project applicant may be required to pay to cover mitigation costs as indicated in CEQA Section 21083.2 shall not apply.**
    - (1). Note: For pipeline trenching and other linear projects in the public Right-of-Way, the PI shall implement the Discovery Process for Pipeline Trenching projects identified below under "D."
  - c. If the resource is not significant, the PI shall submit a letter to MMC indicating that artifacts will be collected, curated, and documented in the Final Monitoring Report. The letter shall also indicate that that no further work is required.
    - (1). Note: For Pipeline Trenching and other linear projects in the public Right-of-Way, if the deposit is limited in size, both in length and depth; the information value is limited and is not associated with any other resource; and there are no unique features/artifacts associated with the deposit, the discovery should be considered not significant.
    - (2). Note, for Pipeline Trenching and other linear projects in the public Right-of-Way, if significance cannot be determined, the Final Monitoring Report and Site Record (DPR Form 523A/B) shall identify the discovery as Potentially Significant.
- D. Discovery Process for Significant Resources - Pipeline Trenching and other Linear Projects in the Public Right-of-Way
- The following procedure constitutes adequate mitigation of a significant discovery encountered during pipeline trenching activities or for other linear project types within the Public Right-of-Way including but not limited to excavation for jacking pits, receiving pits, laterals, and manholes to reduce impacts to below a level of significance:
1. Procedures for documentation, curation and reporting
    - a. One hundred percent of the artifacts within the trench alignment and width shall be documented in-situ, to include photographic records, plan view of the trench and profiles of side walls, recovered, photographed after cleaning and analyzed and curated. The remainder of the deposit within the limits of excavation (trench walls) shall be left intact.



- b. The PI shall prepare a Draft Monitoring Report and submit to MMC via the RE as indicated in Section VI-A.
- c. The PI shall be responsible for recording (on the appropriate State of California Department of Park and Recreation forms-DPR 523 A/B) the resource(s) encountered during the Archaeological Monitoring Program in accordance with the City's Historical Resources Guidelines. The DPR forms shall be submitted to the South Coastal Information Center for either a Primary Record or SDI Number and included in the Final Monitoring Report.
- d. The Final Monitoring Report shall include a recommendation for monitoring of any future work in the vicinity of the resource.

#### IV. **Discovery of Human Remains**

If human remains are discovered, work shall halt in that area and no soil shall be exported off-site until a determination can be made regarding the provenance of the human remains; and the following procedures as set forth in CEQA Section 15064.5(e), the California Public Resources Code (Sec. 5097.98) and State Health and Safety Code (Sec. 7050.5) shall be undertaken:

- A. Notification
  - 1. Archaeological Monitor shall notify the RE or BI as appropriate, MMC, and the PI, if the Monitor is not qualified as a PI. MMC will notify the appropriate Senior Planner in the Environmental Analysis Section (EAS) of the Development Services Department to assist with the discovery notification process.
  - 2. The PI shall notify the Medical Examiner after consultation with the RE, either in person or via telephone.
- B. Isolate discovery site
  - 1. Work shall be directed away from the location of the discovery and any nearby area reasonably suspected to overlay adjacent human remains until a determination can be made by the Medical Examiner in consultation with the PI concerning the provenience of the remains.
  - 2. The Medical Examiner, in consultation with the PI, will determine the need for a field examination to determine the provenience.
  - 3. If a field examination is not warranted, the Medical Examiner will determine with input from the PI, if the remains are or are most likely to be of Native American origin.
- C. If Human Remains **ARE** determined to be Native American
  - 1. The Medical Examiner will notify the Native American Heritage Commission (NAHC) within 24 hours. By law, **ONLY** the Medical Examiner can make this call.
  - 2. NAHC will immediately identify the person or persons determined to be the Most Likely Descendent (MLD) and provide contact information.
  - 3. The MLD will contact the PI within 24 hours or sooner after the Medical Examiner has completed coordination, to begin the



consultation process in accordance with CEQA Section 15064.5(e), the California Public Resources and Health & Safety Codes.

4. The MLD will have 48 hours to make recommendations to the property owner or representative, for the treatment or disposition with proper dignity, of the human remains and associated grave goods.
5. Disposition of Native American Human Remains will be determined between the MLD and the PI, and, if:
  - a. The NAHC is unable to identify the MLD, OR the MLD failed to make a recommendation within 48 hours after being granted access to the site, OR;
  - b. The landowner or authorized representative rejects the recommendation of the MLD and mediation in accordance with PRC 5097.94 (k) by the NAHC fails to provide measures acceptable to the landowner, the landowner shall reinter the human remains and items associated with Native American human remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance, THEN
  - c. To protect these sites, the landowner shall do one or more of the following:
    - (1) Record the site with the NAHC;
    - (2) Record an open space or conservation easement; or
    - (3) Record a document with the County. The document shall be titled "Notice of Reinterment of Native American Remains" and shall include a legal description of the property, the name of the property owner, and the owner's acknowledged signature, in addition to any other information required by PRC 5097.98. The document shall be indexed as a notice under the name of the owner.
  - d. Upon the discovery of multiple Native American human remains during a ground disturbing land development activity, the landowner may agree that additional conferral with descendants is necessary to consider culturally appropriate treatment of multiple Native American human remains. Culturally appropriate treatment of such a discovery may be ascertained from review of the site utilizing cultural and archaeological standards. Where the parties are unable to agree on the appropriate treatment measures the human remains and items associated and buried with Native American human remains shall be reinterred with appropriate dignity, pursuant to Section 5.c., above.
- D. If Human Remains are **NOT** Native American
  1. The PI shall contact the Medical Examiner and notify them of the historic era context of the burial.
  2. The Medical Examiner will determine the appropriate course of action with the PI and City staff (PRC 5097.98).



3. If the remains are of historic origin, they shall be appropriately removed and conveyed to the San Diego Museum of Man for analysis. The decision for internment of the human remains shall be made in consultation with MMC, EAS, the applicant/landowner, any known descendant group, and the San Diego Museum of Man.

**V. 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 8AM of the next business day.
    - b. Discoveries  
All discoveries shall be processed and documented using the existing procedures detailed in Sections III - During Construction, and IV - Discovery of Human Remains. Discovery of human remains shall always be treated as a significant discovery.
    - c. Potentially Significant Discoveries  
If the PI determines that a potentially significant discovery has been made, the procedures detailed under Section III - During Construction and IV-Discovery of Human Remains shall be followed.
    - d. The PI shall immediately contact the RE and MMC, or by 8AM of 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 and/or weekend work becomes necessary during the course of construction
  1. The Construction Manager 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.

**VI. Post Construction**

- A. Submittal of Draft Monitoring Report
  1. The PI shall submit two copies of the Draft Monitoring Report (even if negative), prepared in accordance with the Historical Resources Guidelines (Appendix C/D) which describes the results, analysis, and conclusions of all phases of the Archaeological Monitoring Program (with appropriate graphics) to MMC via the RE for review and approval within 90 days following the completion of monitoring. **It should be noted that if the PI is unable to submit the Draft**



**Monitoring Report within the allotted 90-day timeframe as a result of delays with analysis, special study results or other complex issues, a schedule shall be submitted to MMC establishing agreed due dates and the provision for submittal of monthly status reports until this measure can be met.**

- a. For significant archaeological resources encountered during monitoring, the Archaeological Data Recovery Program or Pipeline Trenching Discovery Process shall be included in the Draft Monitoring Report.
- b. Recording Sites with State of California Department of Parks and Recreation  
The PI shall be responsible for recording (on the appropriate State of California Department of Park and Recreation forms-DPR 523 A/B) any significant or potentially significant resources encountered during the Archaeological Monitoring Program in accordance with the City's Historical Resources Guidelines, and submittal of such forms to the South Coastal Information Center with the Final Monitoring Report.

2. MMC shall return the Draft Monitoring Report to the PI via the RE for revision or, for preparation of the Final Report.
3. The PI shall submit revised Draft Monitoring Report to MMC via the RE 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 Artifacts**

1. The PI shall be responsible for ensuring that all cultural remains collected are cleaned and catalogued
2. The PI shall be responsible for ensuring that all artifacts are analyzed to identify function and chronology as they relate to the history of the area; that faunal material is identified as to species; and that specialty studies are completed, as appropriate.

**C. Curation of artifacts: Accession Agreement and Acceptance Verification**

1. The PI shall be responsible for ensuring that all artifacts associated with the survey, testing and/or data recovery for this project are permanently curated with an appropriate institution. This shall be completed in consultation with MMC and the Native American representative, as applicable.
2. When applicable to the situation, the PI shall include written verification from the Native American consultant/monitor indicating that Native American resources were treated in accordance with state law and/or applicable agreements. If the resources were reinterred, verification shall be provided to show what protective measures were taken to ensure no further disturbance occurs in accordance with Section IV – Discovery of Human Remains, Subsection C.



3. The PI shall submit the Accession Agreement and catalogue record(s) to the RE or BI, as appropriate for donor signature with a copy submitted to MMC.
  4. The RE or BI, as appropriate shall obtain signature on the Accession Agreement and shall return to PI with copy submitted to MMC.
  5. 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 one copy of the approved Final Monitoring Report to the RE or BI as appropriate, and one copy to MMC (even if negative), within 90 days after notification from MMC of the approved report.
  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.

### **Historical Resources (Built Environment)**

**Mitigation Measure HR-1:** Prior to the issuance of any construction permits, including but not limited to, the first grading permit, demolition plans/permits, and building plans/permits for St. Paul's Cathedral, the applicant shall submit construction plans for proposed modifications to St. Paul's Cathedral consistent with the approved project, which has been determined to be in conformance with the U.S. Secretary of the Interior's Standards for Treatment of Historic Properties and related Guidelines.

**Mitigation Measure HR-2.1:** Prior to issuance of any construction permits, including but not limited to, the first grading permit, demolition plans/permits, and building plans/permits for construction of the Olive Building or for demolition and/or construction of the proposed St. Paul's Cathedral improvements along the Sixth Avenue frontage, the existing Queen Palms that are to be removed for project construction shall be boxed for replanting. If any of these existing palms fail to survive after replanting; each shall be replaced with a Queen Palm with a minimum 20-foot brown trunk height in locations consistent with the Sixth Avenue streetscape and to the satisfaction of the City Street Division-Urban Forestry. A surety bond in an amount sufficient to purchase and install replacement trees shall be provided to guarantee the survival of the trees for 3 years. The City Street Division-Urban Forestry staff shall inspect the trees to determine that they are in a healthy and thriving condition prior to release of the bond. If any trees are determined to need additional care or replacement, action as determined by the City Street Division-Urban Forestry prior to the release of the bond shall be taken and the bond shall not be released for an additional 3 years, but may be replaced with a bond to cover only the trees requiring additional care or replacement.



**Mitigation Measure HR-2.2:** Prior to issuance of any construction permits, including but not limited to, the first grading permit, demolition plans/permits, and building plans/permits for construction on the Olive Site, project plans shall show the locations of the palms to be removed and those to be protected from damage during construction. The palms that are to be protected shall be provided with bright yellow or orange temporary fencing or other protection to be shown on the project plans to the satisfaction of the Development Services Department. Stockpiling, topsoil disturbance, construction material storage, vehicle use, foot traffic, and storage of any kind is prohibited within the fenced area. The protection shall be installed and remain in an unaltered and undamaged condition during the entire period of construction until authorized to be removed by the Development Services Department. Should any of the protected palms be damaged to the extent that a Registered Arborist determines that they should be removed, the applicant for the grading or building permit shall be responsible for replacement of the palms in accordance with Mitigation Measure HR-2.1 and for two additional palms for each damaged palm, to be planted along the Sixth Avenue frontage or elsewhere in Balboa Park, at locations identified by the City Street Division-Urban Forestry.

### **Noise**

**Mitigation Measure NOI-1a:** The project proponent shall require any construction activities and contractors to adopt the following measures to control noise generated by construction activities:

- Construction equipment shall be properly maintained per manufacturers' specifications and fitted with the best available noise-suppression devices (e.g., mufflers, silencers, wraps).
- The project proponent and contractors shall not allow heavy-duty construction equipment to operate within 15 feet of adjacent structures to prevent structural damage from construction generated vibration.
- If heavy-duty construction equipment must be operated within 15 feet of adjacent structures, a before and after survey of cracks in the adjacent buildings shall be taken of all structures adjacent to construction activities. If any damage occurs to adjacent structures from heavy equipment operations, the project proponent shall repair all damages.
- All impact tools shall be shrouded or shielded and all intake and exhaust ports on power equipment shall be muffled or shielded.
- Heavy-duty construction equipment shall be staged and used at the farthest distance feasible from adjacent sensitive receptors.
- Construction equipment shall not be idled for extended periods.
- Fixed/stationary equipment (such as generators, compressors, rock crushers, and cement mixers) shall be located as far as possible from noise-sensitive receptors.
- An on-site coordinator shall be employed by the project applicant/contractor and his or her telephone number along with instructions on how to file a noise complaint shall be posted conspicuously around the project site during construction phases. The coordinator's duties shall include fielding and



documenting noise complaints, determining the source of the complaint (e.g., piece of construction equipment), determining whether noise levels are within acceptable limits and according to City standards, and reporting complaints to the City. The coordinator shall contact nearby noise-sensitive receptors, advising them of the construction schedule.

- Project construction and related activities shall be limited to daytime hours (7 a.m. to 7 p.m.).

**Mitigation Measure NOI-1b:** The above mitigation measures would reduce construction noise levels by 10 to 15 dBA at ground level, but would be ineffective for adjacent residences on the second floor or higher and for any actions within 50 feet of adjacent property lines. The following additional mitigation would ensure that all adjacent residences are not exposed to noise levels exceeding 75 dBA Leq or noise that exceeds 10 dB above existing ambient noise levels:

- Construction equipment operating at noise levels exceeding 75 dBA Leq shall not actively operate for more than 30 minutes of each 1 hour period within 30 feet of adjacent sensitive receptors.
- Noise barriers shall be erected along the eastern boundary of the project site. Noise barriers during shoring activities shall be 14 feet in height. Noise barrier heights during excavation shall be 14 feet in height until the site is excavated to a depth of 7 feet, when the barrier height may be reduced to 12 feet. At an excavation depth of 14 feet or greater the barrier may be reduced to 8 feet. A minimum 8-foot-high barrier shall be maintained along the eastern boundary of the Nutmeg Site throughout excavation and foundation activities. The noise barriers should be constructed of material with a minimum weight of 4 pounds per square foot with no gaps or perforations. Noise barriers may be constructed of, but are not limited to, 5/8-inch plywood and 5/8-inch oriented strand board.
- Due to shading effects on adjacent residences, lower vertical wall height maybe desired. Wall heights may be lowered 6 inches or more by creating a cantilevered extension at the top of the wall. Effectively, a 10-foot high wall with an approximate 2-foot cantilevered portion angled 45 degrees toward the project site would be as effective as a 12-foot barrier vertical barrier with a height of a little over 11 feet. To use cantilevered walls, the cantilever length would depend on the vertical wall height. Table 4.6-8 of the St. Paul's Cathedral and Residences Project EIR provides the of the required cantilever length for various wall heights.

**Mitigation Measure NOI-2:** The project proponent shall ensure that design and installation of stationary noise sources for the project meet the measures described below:

- Implement best design considerations and shielding, including installing stationary noise sources associated with HVAC systems indoors in mechanical rooms.



- Prior to the issuance of a building permit, the applicant or its designee shall prepare an acoustical study(s) of proposed mechanical equipment, which shall identify all noise- generating equipment, predict noise level property lines from all identified equipment, and recommended mitigation to be implemented (e.g., enclosures, barriers, site orientation), as necessary, to comply with the City of San Diego noise ordinance.

### **Paleontological Resources**

#### **Mitigation Measure PR-1:**

- 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/Permits or a Notice to Proceed for Subdivisions, but prior to the first preconstruction meeting, whichever is applicable, the Assistant Deputy Director (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 Mitigation Monitoring Coordination (MMC) identifying the Principal Investigator (PI) for the project and the names of all persons involved in the paleontological monitoring program, as defined in the City of San Diego 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
    1. 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
    1. Prior to beginning any work that requires monitoring; the Applicant shall arrange a Precon Meeting that shall include



the PI, Construction Manager (CM) and/or Grading Contractor, Resident Engineer (RE), Building Inspector (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 Construction Manager 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 11 x 17 inches) 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
  1. 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 Construction Manager 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 Consultant Site Visit Record (CSV). The CSVs 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.
      - b. Discoveries – All discoveries shall be processed and documented using the existing procedures detailed in Sections 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 Construction Manager 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
    - 1. 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 PI 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.
2. 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.



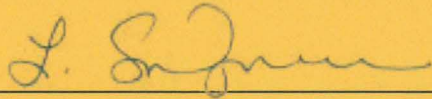
## **VIII. SIGNIFICANT UNMITIGATED IMPACTS**

The St. Paul's Cathedral and Residences EIR (No. 96101/SCH No. 2009101036) indicated that direct significant impacts to the following issues would be substantially lessened or avoided if all the proposed mitigation measures recommended in the EIR were implemented: transportation/circulation/parking; historical resources; noise; and paleontological resources. The St. Paul's EIR concluded that there were no significant unmitigated impacts.

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 St. Paul's EIR.

## **IX. CERTIFICATION**

Copies of the addendum, the St. Paul's EIR (No. 96101/SCH No. 2009101036), the MMRP, 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

October 12, 2018

Date of Final Report

### **Attachments:**

- Figure 1: Location Map
- Figure 2: Aerial Photograph
- Figure 3: Project Components
- Figure 4: Site Plan



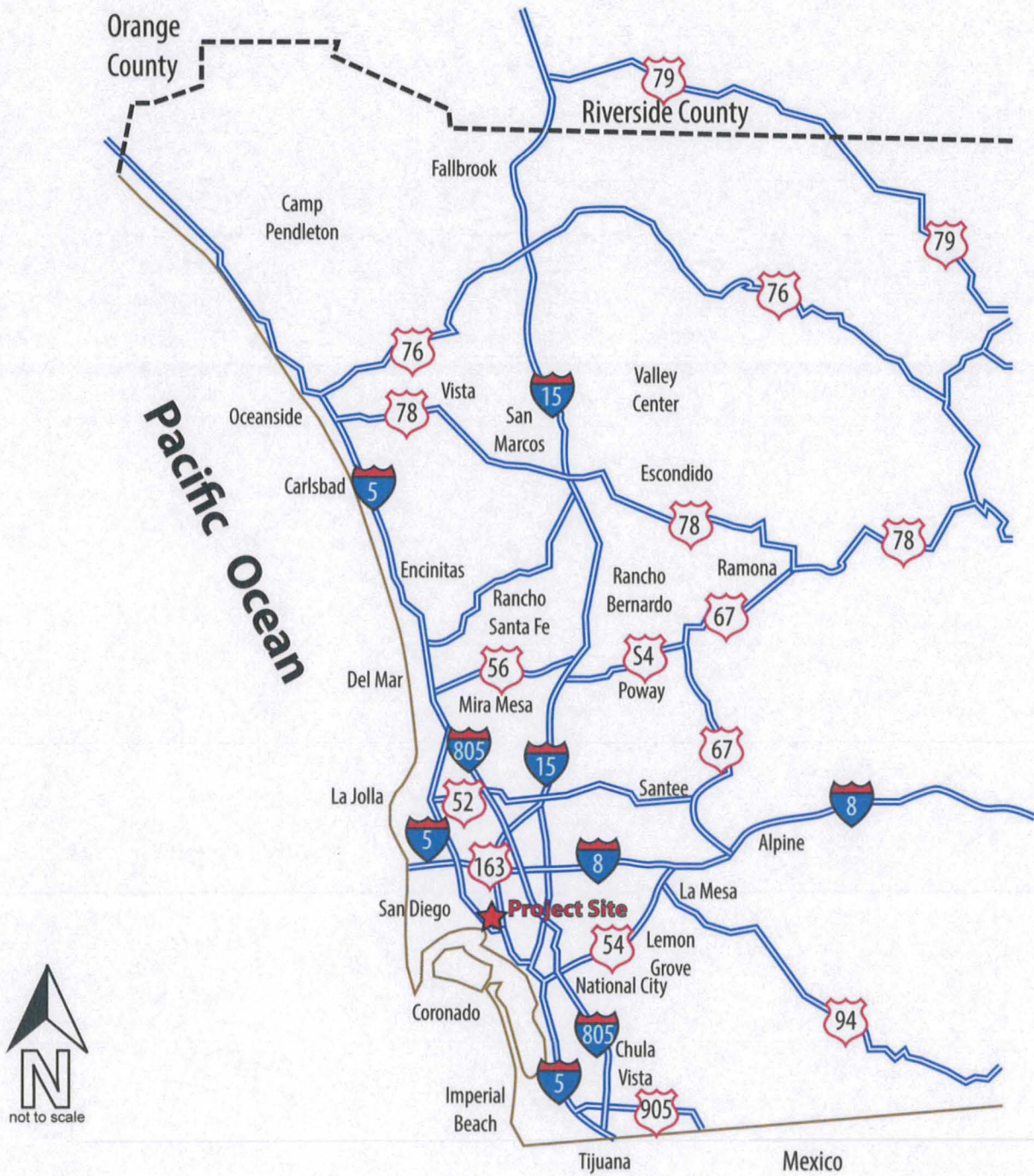
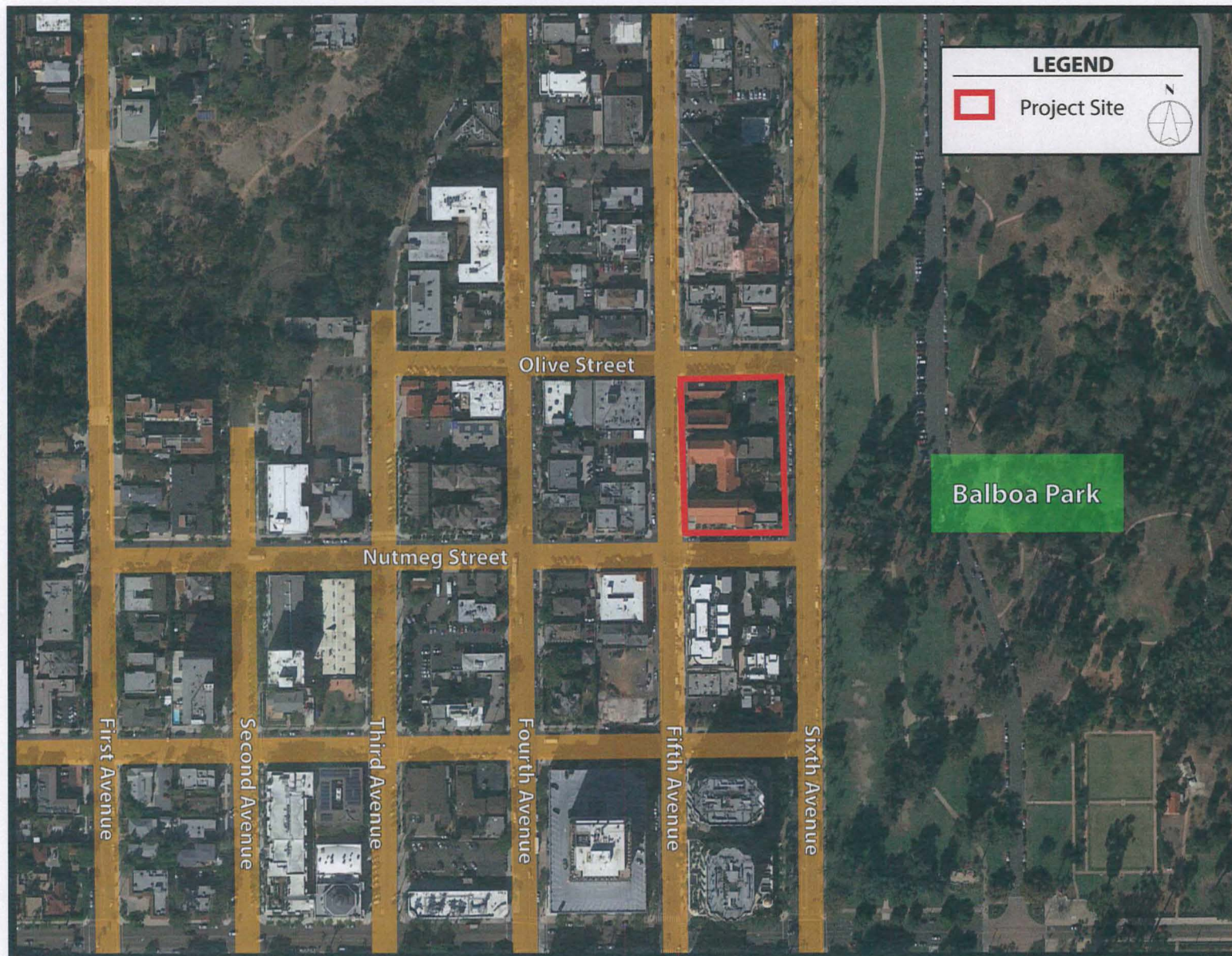


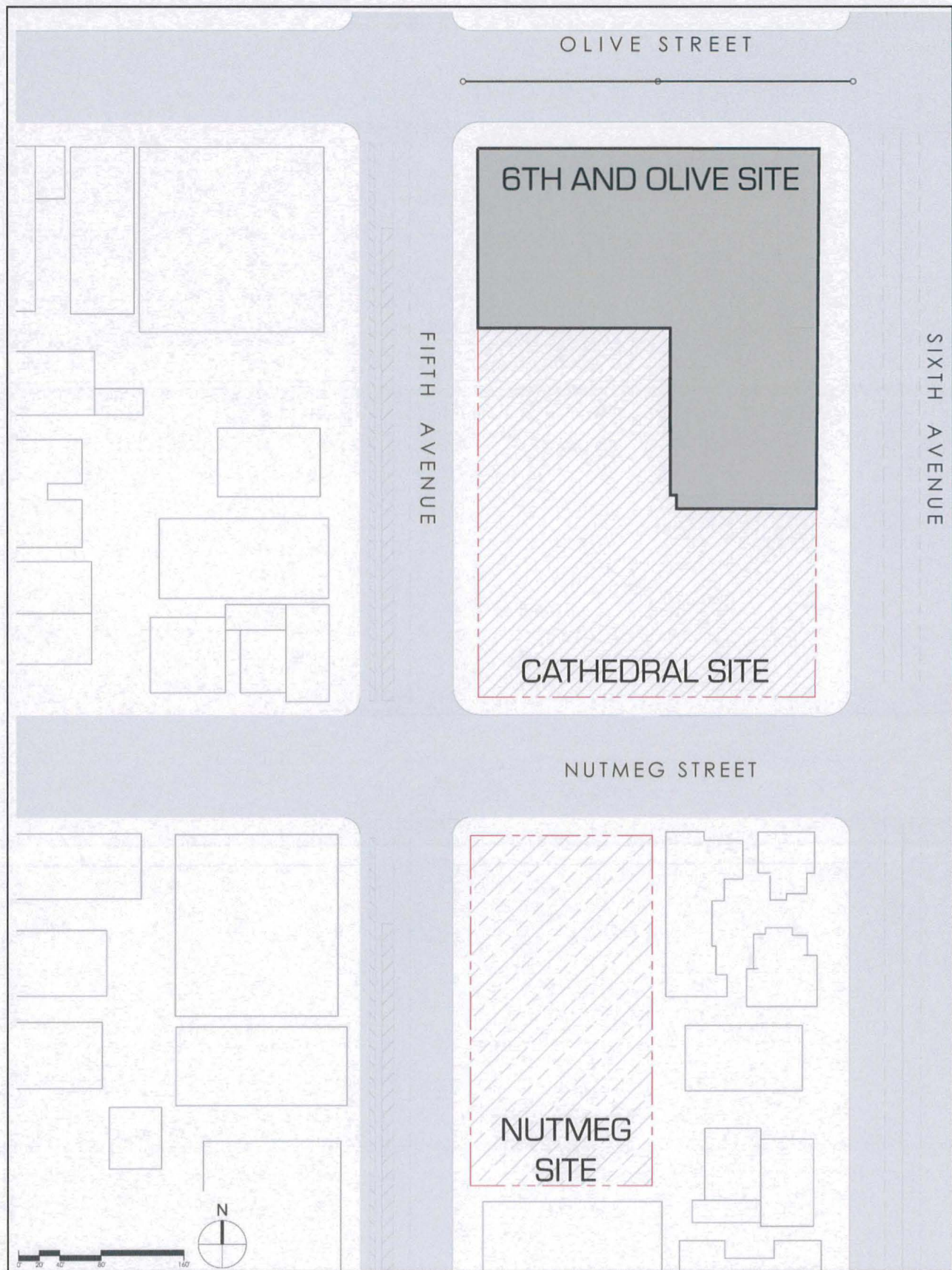
Figure 1. Project Location Map





**Figure 2. Aerial Photograph**





**Figure 3. Project Components**



