MITIGATED NEGATIVE DECLARATION

THE CITY OF SAN DIEGO

Project No. 522075
I.O. No. 24007078
SCH No.: N/A

SUBJECT: **HILLCREST 111: NEIGHBORHOOD DEVELOPMENT PERMIT (NDP)** to demolish the existing surface parking lot and to allow the development of 111 residential dwelling units, including nine very-low income units, and 4,800 square feet of commercial retail space within a ~~136,213~~136,816-square-foot, seven story mixed-use building with three levels of underground parking and a detached subterranean parking structure, all located on a 42,000 square-foot site at 635 Robinson Avenue (APN 452-103-61-00) in the Uptown Community Plan area. The project would comply with existing Conditional Use Permit (CUP) No. 11086 and would continue to provide parking (86 stalls) for the AT&T building located off-site and immediately north of the project site. The project site is zoned MR-800B (Residential-High Density) and CN-1A (Mixed-Use-Very High Intensity) within the Mid-City Communities Planned District. It is also subject to the Airport Influence Area (Review Area 2), Federal Aviation Administration (FAA) Part 77 Noticing Area for the San Diego International Airport; Residential Tandem Parking Overlay Zone; and the Transit Area Overlay Zone. (Legal Description: Lots 25 through 36, Block 4 of Crittenden Addition Map No. 303, Filed in the Office of the County Recorder of San Diego County, October 5, 1886, Situated in the City of San Diego, in the County of San Diego, State of California.) Applicant: Greystar.

UPDATE: **February 20, 2018. Clarifications/revisions, minor typographical corrections, and additional information have been added to this document, in response to comments submitted when compared to the draft MND. Specifically, a correction to the project's overall square footage was made, changing 136,213 square feet to 136,816 square feet. Also, reference to a mix of 20th century-style architecture has been included in the discussion of the visual character in the surrounding environment.**

In accordance with the California Environmental Quality Act Section 15073.5, a lead agency is not required to recirculate a Mitigated Negative Declaration when new information is added that merely clarifies, amplifies, or makes insignificant modifications to the negative declaration. The modifications made in the final environmental document do not affect the analysis or conclusions of the Mitigated Negative Declaration. All revisions are shown in a ~~strikethrough~~ and/or underline format.

I. **PROJECT DESCRIPTION:** See attached Initial Study.

II. **ENVIRONMENTAL SETTING:** See attached Initial Study.

III. **DETERMINATION:** The City of San Diego conducted an Initial Study which determined that the proposed project could have a significant environmental effect in the following areas:

Paleontological Resources, Noise, and Transportation/Traffic. Subsequent revisions in the project proposal create the specific mitigation identified in Section V of this Mitigated Negative Declaration. The project as revised now avoids or mitigates the potentially significant environmental effects previously identified, and the preparation of an Environmental Impact Report will not be required.

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

V. MITIGATION MONITORING AND REPORTING PROGRAM:

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 Mitigation Monitoring and Reporting Program (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) For Clarification of ENVIRONMENTAL REQUIREMENTS, applicant is also required to call **RE and MMC at 858-627-3360**

2. **MMRP COMPLIANCE:** This Project, Project Tracking System (PTS) Number 522075 and/or Environmental Document Number 522075, 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 affecting the MMRP. Resolution of such 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.

   None Required.

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

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

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

DOCUMENT SUBMITTAL/INSPECTION CHECKLIST		
Issue Area	**Document Submittal**	**Associated Inspection/ Approvals/Notes**
General	Consultant Qualification Letters	Prior to Preconstruction Meeting
General	Consultant Construction Monitoring Exhibits	Prior to or at Preconstruction Meeting
Paleontology	Paleontology Reports	Paleontological Site Observations
Noise	Acoustical Reports	Noise Mitigation Features Inspection
Bond Release	Request for Bond Release Letter	Final MMRP Inspections Prior to Bond Release Letter

C. SPECIFIC MMRP ISSUE AREA CONDITIONS/REQUIREMENTS

PALEONTOLOGICAL RESOURCES

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:

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C. SPECIFIC MMRP ISSUE AREA CONDITIONS/REQUIREMENTS

PALEONTOLOGICAL RESOURCES

I. Prior to Permit Issuance

A. Entitlements Plan Check

1. Prior to issuance of any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/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 the San Diego Natural History Museum, another institution or, if the search was conducted 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 CM and/or Grading Contractor.

a. If the PI is unable to attend the Precon Meeting, the Applicant shall schedule a focused Precon Meeting with MMC, the PI, RE, CM or BI, if appropriate, prior to the start of any work that requires monitoring.

2. Identify Areas to be Monitored
Prior to the start of any work that requires monitoring, the PI shall submit a Paleontological Monitoring Exhibit (PME) based on the appropriate construction documents (reduced to 11x17) to MMC identifying the areas to be monitored including the delineation of grading/excavation limits. The PME shall be based on the results of a site specific records search as well as information regarding existing known soil conditions (native or formation).

3. When Monitoring Will Occur
   a. Prior to the start of any work, the PI shall also submit a construction schedule to MMC through the RE indicating when and where monitoring will occur.
   b. The PI may submit a detailed letter to MMC prior to the start of work or during construction requesting a modification to the monitoring program. This request shall be based on relevant information such as review of final construction documents which indicate conditions such as depth of excavation and/or site graded to bedrock, presence or absence of fossil resources, etc., which may reduce or increase the potential for resources to be present.

III. During Construction

A. Monitor Shall be Present During Grading/Excavation/Trenching
   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 relevant field condition occurs, 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 (CSVR). The CSVR'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 of paleontological resources, 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 the 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 the 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 8AM 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 8AM 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 the 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.

NOISE

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 construction noise attenuation have been noted on the appropriate construction documents as described in the Noise Analysis for Hillcrest 111, City of San Diego, California, prepared by Landrum and Brown, July 6, 2017.

2. Prior to construction of the parking structure, a 12-foot high temporary sound barrier shall be installed along the southern edge of the project site. The temporary sound barrier shall consist of either:

   a. Plywood with a total thickness of 1-1/2 inches, or

   b. A sound blanket wall with a Sound Transmission Class (STC) rating of 27. Examples of acceptable blankets can be found at the following websites:

      www.enoisecontrol.com/outdoor-sound-blankets.html and
      www.acousticalsurfaces.com/curtan_stop/curt_absorb.htm?d=12.

      Other blankets are acceptable as long as they have a STC rating of 27 or higher.

3. Prior to Final Inspection, the owner/permittee shall construct a noise barrier, four feet in height relative to the pad elevation of the HVAC units, around the perimeter of the HVAC units located on the roof of the mixed-use building and the 7th floor of the mixed-use building.

TRANSPORTATION/TRAFFIC

Prior to Certificate of Occupancy, the owner/permittee shall restripe the segment of Robinson Avenue between 6th Avenue and 7th Avenue to include a center left turn lane and provide a separate left turn lane at the westbound approach at Robinson/7th Avenue, and associated traffic signal modifications, satisfactory to the City Engineer.

VI. PUBLIC REVIEW DISTRIBUTION: Draft copies or notice of this Mitigated Negative Declaration were distributed to:

CITY OF SAN DIEGO
Mayor's Office
Councilmember Ward – District 3

City Attorney's Office
Development Services
- Development Project Manager
- Senior Environmental Planner
- Associate Planner, Environmental
- Senior Traffic Engineer, Transportation Development
- Assistant Engineer, Transportation Development
- Associate Engineer, Engineering
- Senior Planner, Planning Review
- Associate Planner, Planning Review
- Associate Planner, Landscaping
- Associate Engineer, Geology
- Associate Engineer, Water & Sewer Development
- Fire Prevention Inspector, Fire- Plan Review
- Senior Planner, Environmental Services Department

Planning Department
- Senior Planner, Airport

Facilities Financing
San Diego Central Library
Mission Hills Branch Library

OTHER ORGANIZATIONS AND INTERESTED PARTIES
Middletown Property Owner's Assoc, Attn: R.H. Stowers, Chair
Mission Hills Heritage, Barry Hager, President
Uptown Planners, Leo Wilson, Chair
Hillside Protection Association
Banker's Hill Canyon Association, C/O Suzanne Richardson
Allen Canyon Committee
UCSD Physical & Community Planning, Brad Werdick, AICP, Director
Tom Mullaney
Ann Garwood
Everett DeLano
Amie Hayes, Save Our Heritage Organisation
Rick Dellacquila
Susan Fosselman
Donna Shanske
Jim Black
Deirdre Lee
Karen Ruggels, KLR PLANNING
Matt MacLeod
Jim Ivory, Greystar
Jeannette Temple, Atlantis Group

VII. RESULTS OF PUBLIC REVIEW:

( ) No comments were received during the public input period.
( ) Comments were received but did not address the draft Mitigated Negative Declaration finding or the accuracy/completeness on the Initial Study. No response is necessary. The letters are attached.
(**X**) Comments addressing the finding of the draft Mitigated Negative Declaration and/or accuracy or completeness of the Initial Study were received during the public input period. The letters and responses follow.

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

Anna L. McPherson, AICP, Senior Planner
Development Services Department

December 21, 2017
Date of Draft Report

February 20, 2018
Date of Final Report

Analyst: R. Benally

Attachments:
Initial Study Checklist
Figure 1 – Location Map
Figure 2 – Site Plan
Figure 3 – East Elevation
Figure 4 – West Elevation
Figure 5 – North Elevation
Figure 6 – South Elevation

Appendices:

Appendix A:	Geotechnical Investigation
Appendix B:	CAP Consistency Checklist
Appendix C:	No FAA Notification Self-Certification Agreement
Appendix D:	Storm Water Quality Management Plan
Appendix E:	Preliminary Drainage Study
Appendix F:	7th Avenue Sewer Replacement Technical Memorandum
Appendix G:	Noise Analysis
Appendix H:	Waste Management Plan
Appendix I:	7th & Robinson Traffic Assessment
Appendix J:	Air Quality Analysis

HILLCREST 111 MITIGATED NEGATIVE DECLARATION COMMENT LETTERS

The following comment letters were received from agencies, organizations, and individuals during the public review of the Mitigated Negative Declaration. A copy of each comment letter along with corresponding staff responses has been included.

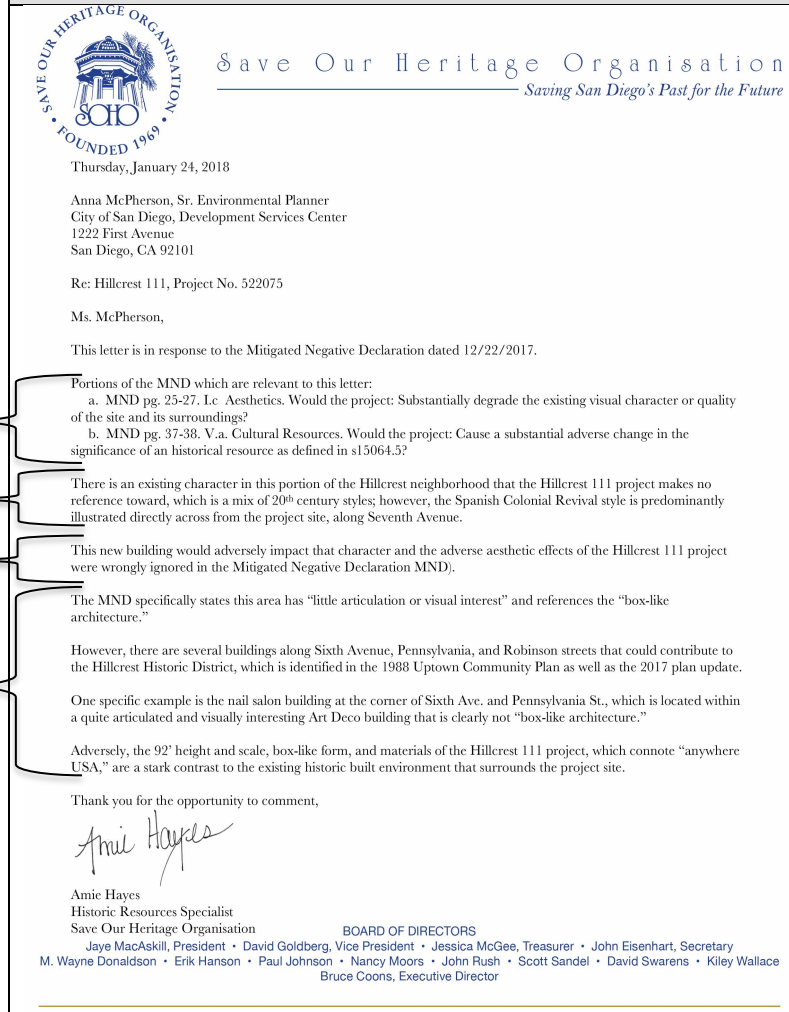
In accordance with the California Environmental Quality Act (CEQA) Guidelines Section 15204(b), the review of a [mitigated] negative declaration should focus on the proposed finding that the project will not have a significant effect on the environment. According to CEQA Guidelines Section 15204(b), if persons and public agencies believe that the project may have a significant effect, they should: (1) Identify the specific effect, (2) Explain why they believe the effect would occur, and (3) Explain why they believe the effect would be significant.

Many of the comments received during public review of the Hillcrest 111 Mitigated Negative Declaration (MND) did not address the adequacy and/or sufficiency of the environmental document; however, staff endeavored to provide responses as appropriate as a courtesy to the commenters. Where letters of comment have resulted in revisions to the December 2017 MND, those changes are indicated in the Final MND in strike-out/underline format (where omitted text is shown as ~~stricken~~ and added text is shown as <u>underlined</u>). Revisions that have been made to the Final MND do not affect the conclusions contained in the draft MND or the adequacy of the environmental document.

Letter	Author	Address	Date	Representing	Page Number of Letter
LOCAL AGENCIES					
A	Amie Hayes Historic Resources Specialist	Save Our Heritage Organisation	January 24, 2018	Save Our Heritage Organisation	3
INDIVIDUALS					
B	Tom Mullanney Executive Director	3636 4th Avenue, Suite 310 San Diego, CA 92103	January 24, 2018	Uptown United	4
C	Tom Mullanney Executive Director	3636 4th Avenue, Suite 310 San Diego, CA 92103	January 25, 2018	Uptown United	18
D	Everett DeLano	DeLano and DeLano 104 W. Grand Avenue, Suite C Escondido, CA 92025	January 25, 2018	Uptown United	26
E	Rick Dellacquila		January 25, 2018	Rick Dellacquila	40
F	Susan Fosselman	4315 10th Avenue San Diego, CA 92103	January 25, 2018	Susan Fosselman	42
G	Donna Shanske		January 25, 2018	Donna Shanske	43

Letter	Author	Address	Date	Representing	Page Number of Letter
H	Jim Black		January 2018	Jim Black	47
I	Deirdre Lee	244 W Brookes Ave San Diego, CA 92103	January 27, 2018	Deirdre Lee	50

COMMENT	RESPONSE



Save Our Heritage Organisation
Saving San Diego's Past for the Future

Thursday, January 24, 2018

Anna McPherson, Sr. Environmental Planner
City of San Diego, Development Services Center
1222 First Avenue
San Diego, CA 92101

Re: Hillcrest 111, Project No. 522075

Ms. McPherson,

This letter is in response to the Mitigated Negative Declaration dated 12/22/2017.

Portions of the MND which are relevant to this letter:
a. MND pg. 25-27. I.c Aesthetics. Would the project: Substantially degrade the existing visual character or quality of the site and its surroundings?
b. MND pg. 37-38. V.a. Cultural Resources. Would the project: Cause a substantial adverse change in the significance of an historical resource as defined in s15064.5?

A-1

There is an existing character in this portion of the Hillcrest neighborhood that the Hillcrest 111 project makes no reference toward, which is a mix of 20th century styles; however, the Spanish Colonial Revival style is predominantly illustrated directly across from the project site, along Seventh Avenue.

A-2

This new building would adversely impact that character and the adverse aesthetic effects of the Hillcrest 111 project were wrongly ignored in the Mitigated Negative Declaration MND).

A-3

The MND specifically states this area has "little articulation or visual interest" and references the "box-like architecture."

However, there are several buildings along Sixth Avenue, Pennsylvania, and Robinson streets that could contribute to the Hillcrest Historic District, which is identified in the 1988 Uptown Community Plan as well as the 2017 plan update.

One specific example is the nail salon building at the corner of Sixth Ave. and Pennsylvania St., which is located within a quite articulated and visually interesting Art Deco building that is clearly not "box-like architecture."

A-4

Adversely, the 92' height and scale, box-like form, and materials of the Hillcrest 111 project, which connote "anywhere USA," are a stark contrast to the existing historic built environment that surrounds the project site.

Thank you for the opportunity to comment,

Amie Hayes
Historic Resources Specialist
Save Our Heritage Organisation

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Bruce Coons, Executive Director

A-1 Comment noted. This comment provides introductory statements and does not address the adequacy of the MND.

A-2 Comment noted. This comment provides information relative to the architectural styles within the Hillcrest neighborhood.

The MND Section I, Aesthetics, states: "Surrounding residential development exhibits craftsman, Spanish, and contemporary architecture, while the commercial components of the surrounding exhibit traditional box-like architecture with little articulation or visual interest. There is no single or common architectural theme that applies to the whole of the project surroundings. As such, the proposed project would not have an architectural style or use building materials in stark contrast with adjacent developments of a single or common architectural theme."

The proposed project uses building materials that are found on the buildings directly across from the project site, including entry porches for residential units, brick veneer, metal and fabric awnings, metal canopies, porcelain tile with faux wood finish, anodized storefront glazing, and perforated metal accents. Architectural features of the proposed building include multiple pitched roofs, transom windows on the top floor, windows recessed at least two inches, and eaves with a minimum overhang of 18 inches.

Language relative to the location of 20th century style architecture in the surrounding neighborhood has been added to the MND.

A-3 Comment noted. Neighborhood character is addressed in Section I, Aesthetics of the MND.

A-4 Comment noted. See Section I, Aesthetics, of the MND. Note that the maximum project height is 84 feet.

COMMENT	RESPONSE
UPTOWN UNITED 3636 4th Avenue, Suite 310 San Diego CA 92103 619-889-5626 January 24, 2018 (via email) Anna L. McPherson Senior Environmental Planner City of San Diego, Development Services Center **Re: Project Name: Hillcrest 111. Project No. 522075** **SHADOW STUDIES** To the City of San Diego: This letter is submitted on behalf of ***Uptown United*** in connection with the Mitigated Negative Declaration (MND) dated 12/22/2017. The attached Shadow Studies were created using the applicant's drawings, and publically available information for the surrounding properties. • Each page shows one of the four seasons, at five different times of day. • In addition, an enlarged view shows the Spring Equinox at 3:00 pm. **The following observations refer to the shadow impacts to the residences on the east side of 7th Avenue, opposite the proposed building:** 1. These residences consist of one and two story buildings. They would be impacted visually by the proposed Project, which is 90 ft in height. 2. An important indicator of shadowing is the time of day when the shadows reach the front of the residences. This is significant because in the afternoon, the western-facing windows admit most of the light to these homes. When the western windows are in shadows, the interior of the homes lose a large portion of the sunlight. 3. On the Winter Solstice, the shadows from the proposed building would reach the front of the residences, to the east and northeast, about 2:00 pm. With sunset at 4:46 pm, the residences would be in shadows for over half of the afternoon daylight hours. Shadow Studies Page 1 of 3	**B-1** Comments noted. This comment provides introduction to the letter and references the "Shadow Studies" included with the letter. It should be noted that the City of San Diego's CEQA "Significance Determination Thresholds" (2011) do not include a significance threshold pertaining to the creation of shadows. Based upon an analysis of the project design, the MND did conclude that the project "would not substantially block light or create significant shade impacts" because it would be "stepped back along the southern elevation and would be separated from existing residential developments by the parking structure footprint" and "would not cast shadows or shading that would extend substantially beyond the property boundary for extended periods of time." **B-2** The proposed project would develop a mixed-use structure with varying height that would be a maximum of 84 feet (instead of 90 feet, as referenced by the commenter). The two main structural elements would be 84 feet and 76 feet, with lower building heights on elements of the building. A courtyard would be located on the second floor, providing 1,770 square feet of outdoor space. This second floor podium deck would result in open air above, physically breaking up the building mass and providing for solar penetration through the proposed building. As shown in Figure 1, *Location Map*, of the MND, there are five residential buildings located opposite the project site on the east side of 7th Avenue. The northern-most building, located at approximately 701 Robinson Avenue, is a single-story, single-family residential building. (See photo below.) This residence takes access from Robinson Avenue, which means the western and southern elevations represent the side and rear of the building, respectively. At the time of the field survey of 7th Avenue, all windows facing west were covered with interior reflective sheeting.

COMMENT	RESPONSE
	 **701 Robinson Avenue** (photo taken January 31, 2018; 1:30 PM) The next building is located at approximately 3781 7th Avenue. (See photo below.) This building is a two-story, multi-family residential building with surface and garage parking to the rear (east). The building is oriented in an east-west manner on a deep lot; the majority of the windows are located on the north and south elevations and do not face 7th Avenue. Similar to the neighbor to the north, all windows were covered with window shades at the time of the field survey.

COMMENT	RESPONSE
	 **3781 7th Avenue** (photo taken January 31, 2018; 1:30 PM) The building located at approximately 3769 7th Avenue is a two-story, multi-family structure with surface and garage parking to the rear of the lot (east). (See photo below.) Like the property to the north, the building is oriented in an east-west manner on a deep lot, therefore, the majority of the building's windows are on the north and south elevations and do not face 7th Avenue. At the time of field survey, this building was partially shaded by landscaping on the west side of 7th Avenue and by on-site mature trees, indicating that, as in all neighborhoods, shadows are moving across structures – from both natural and built elements – at various times of the year and for varying durations.

COMMENT	RESPONSE
	 **3769 7th Avenue** (photo taken January 31, 2018; 1:30 PM) The building located at approximately 3763 7th Avenue is a two-story, multi-family building with garage – and possibly surface – parking to the rear of the lot (east). (See photo below.) The majority of the windows are located on the north and south elevations and do not face 7th Avenue. Similar to the neighbor to the north, all windows were covered with window shades at the time of the field survey.

COMMENT	RESPONSE
	 **3763 7th Avenue** (photo taken January 31, 2018; 1:30 PM) The final property east of the project site is located at 3755 7th Avenue. This property consists of a single-story, single-family home and a companion unit located above the rear garage at 3755 ½ 7th Avenue. (See photo below.) The majority of the windows are located on the north and south elevations and do not face 7th Avenue. Similar to the neighbor to the north, all windows were covered with window shades at the time of the field survey.

COMMENT	RESPONSE
	 **3755 7th Avenue** (photo taken January 31, 2018; 1:30 PM) **B-3** Comment noted. **B-4** As shown in the commenter's shadow study, two of the five buildings located to the east of the project site along 7th Avenue would be shadowed at 4:00 PM (noted as 2:00 PM in the comment; at 2:00 PM the shadow would reach the property, but not the actual buildings due to setbacks). As stated by the commenter, sunset at the Winter Solstice is 4:46 PM. Therefore, the affected buildings would have shadows cast upon them for 46 minutes. Per online sun resources (www.timeanddate.com was utilized for this analysis), the daylight hours on December 21st are from 6:46 AM to 4:46 PM, resulting in ten hours of daylight. Solar noon is at 11:46 AM, resulting in five afternoon daylight hours. The proposed project would cast shadows during less than one-tenth of the daylight hours and less than one-fifth of the afternoon hours.

COMMENT	RESPONSE
B-5 4. On the Spring Equinox, the enlarged image shows: The shadows from the proposed building would reach the front of the 7th Avenue residences about 3:00 pm. With sunset at 7:01 pm, the residences would be in shadows for over half of the daylight hours after noon -- for four of the seven hours. **B-6** 5. On the Summer Solstice, the shadows from the proposed building would reach the front of the residences about 4:00 pm. With sunset at 7:59 pm on that day, the residences would be in shadow for half of the daylight hours after noon -- for the last four hours of daylight. It should be noted that the summer solstice, in a sense, represents the "best case" for sunlight, because of the high sun angle. If the blocking of the sun at 4:00 pm is significant, we should note the effects are more severe the other 364 days of the year. **B-7** 6. On the Autumn Equinox, the shadows are essentially the same as on the Spring Equinox. **B-8** 7. The Equinox images are valuable for another reason: March 21 and September 21 are dates which mark neither the longest shadows of winter, nor the shortest shadows of summer, but rather represent an intermediate scenario. In viewing the Equinox images, we can keep in mind that there are fewer hours of sunlight, and a lower sun-angle, for six months of the year. Therefore, to the extent that the shadow impacts are significant on the Equinoxes, they are more severe for one-half of the year. **This observation refers to the properties to the west of the proposed building:** **B-9** 8. Because of the zero setback of the proposed building on the alley side, and the narrow 20 ft wide alley, the proposed building would have a significant shadow impact on the properties directly to the west. This impact would take place in the morning, for all four seasons. This can be seen from the 8am and 10am images. At the Winter Solstice, the proposed building would also impact the properties to the northwest, to the north of Robinson. **This final observation refers to the entire study area, in all four seasons:** **B-10** 9. The shadow of the proposed building is greater in area than the shadows from existing buildings in the study area. The reason is the taller height, and also the considerable bulk (width and length) of the proposed building, in relation to the other buildings shown. Shadow Studies Page 2 of 3	**B-5** As shown in the commenter's shadow study, one building located to the east of the project site would be shadowed at 3:00 PM. As stated by the commenter, sunset at the Spring Equinox is 7:01 PM. Therefore, the affected buildings would have shadows cast upon them for approximately four hours. Per online sun resources (www.timeanddate.com was utilized for this analysis), the daylight hours on March 21st are from 6:50 AM to 7:01 PM, resulting in 12 hours and ten minutes of daylight. Solar noon is at 12:55 PM, resulting in slightly over six afternoon daylight hours. The proposed project would cast shadows during four of these late afternoon hours on the northern building and three of the hours on the adjacent building to the south. However, the existing urban condition is already affecting the buildings for some of the affected period of time due to the sun's location relative to the horizon. The proposed project would cast shadows during one-third to one-quarter of the daylight hours and two-thirds to one-half of the afternoon hours. The ever-changing shadows could be consistent with an urban environment made up of a mix of building types and heights with mature trees and landscaping, as is demonstrated in existing development within the Hillcrest area such as the Coral Tree Plaza at 3634 7th Avenue, located two blocks south of the proposed development; at El Prado residences at 666 Upas Street; and Park One residences at 3415 6th Avenue. **B-6** As shown in the commenter's shadow study, a corner of the northernmost building and its surface parking area located to the east of the project site along 7th Avenue would be shadowed at 4:00 PM. As stated by the commenter, sunset at the Summer Solstice is 7:59 PM. Therefore, the affected corner of the building would have shadows cast upon it for approximately four hours. Per online sun resources (www.timeanddate.com was utilized for this analysis), the daylight hours on June 22nd are from 5:41 AM to 7:59 PM, resulting in 14 hours and 18 minutes of daylight. Solar noon is at 12:50 PM, resulting in slightly over seven afternoon daylight hours. The proposed project would cast shadows during four of these hours in the late afternoon on the

COMMENT	RESPONSE
	corner of the northern building. All remaining buildings and portions of buildings are not shown to be shadowed by the commenter's shadow study. The existing urban condition is already affecting the buildings for some of the affected period of time due to the sun's location relative to the horizon. The proposed project would cast shadows during less than one-third of the daylight hours and slightly over one-half of the afternoon hours. Refer also to Response number B-5. **B-7** As shown in the commenter's shadow study, two buildings located to the east of the project site along 7th Avenue would be shadowed at 4:00 PM during the Autumn Equinox. Although not provided by the commenter, sunset at the Autumn Equinox is 6:46 PM. Therefore, the affected buildings would have shadows cast upon them for approximately two and three-quarter hours in the late afternoon, providing relief from the late summer hot afternoon sun. Per online sun resources (www.timeanddate.com was utilized for this analysis), the daylight hours on September 21st are from 6:36 AM to 6:46 PM, resulting in 12 hours and ten minutes of daylight. Solar noon is at 12:41 PM, resulting in slightly over six afternoon daylight hours. The proposed project would cast shadows during two and three-quarter hours on the two affected buildings. The proposed project would cast shadows during less than one-quarter of the daylight hours and less than one-half of the afternoon hours. Refer also to Response Number B-5. **B-8** Comments noted. This comment provides commenter opinion on the representation of the equinox relative to shadow severity. **B-9** The alley that forms the project's western boundary is a City-standard 20-foot alley. The properties to the west of the project site are commercial buildings with minimal windows along the eastern (rear) elevation, as shown in the Google image provided

COMMENT	RESPONSE
	below.  As noted by the commenter, the majority of the shadows from the project would be in the morning hours, between 8:00 AM and 10:00 AM. The properties located opposite the project's western boundary are (from north to south): 76 gas station (assumed to operate under normal gas station business hours), Hillcrest Printing and Postal (permanently closed), Cascade Spa (operating hours 10:00 AM to 11:00 PM daily), Ebisu Sushi Bar (operating hours 5:00 PM to 11:00 PM Monday through Thursday, 5:00 PM to 12:00 AM Friday, 12:00 PM to 12:00 AM Saturday, and 12:00 PM to 11:00 PM Sunday), Lotus Thai (operating hours 11 AM to 3:00 PM and 5:00 PM to 10:00 PM Monday through Thursday, 11 AM to 3:00 PM and 5:00 PM to

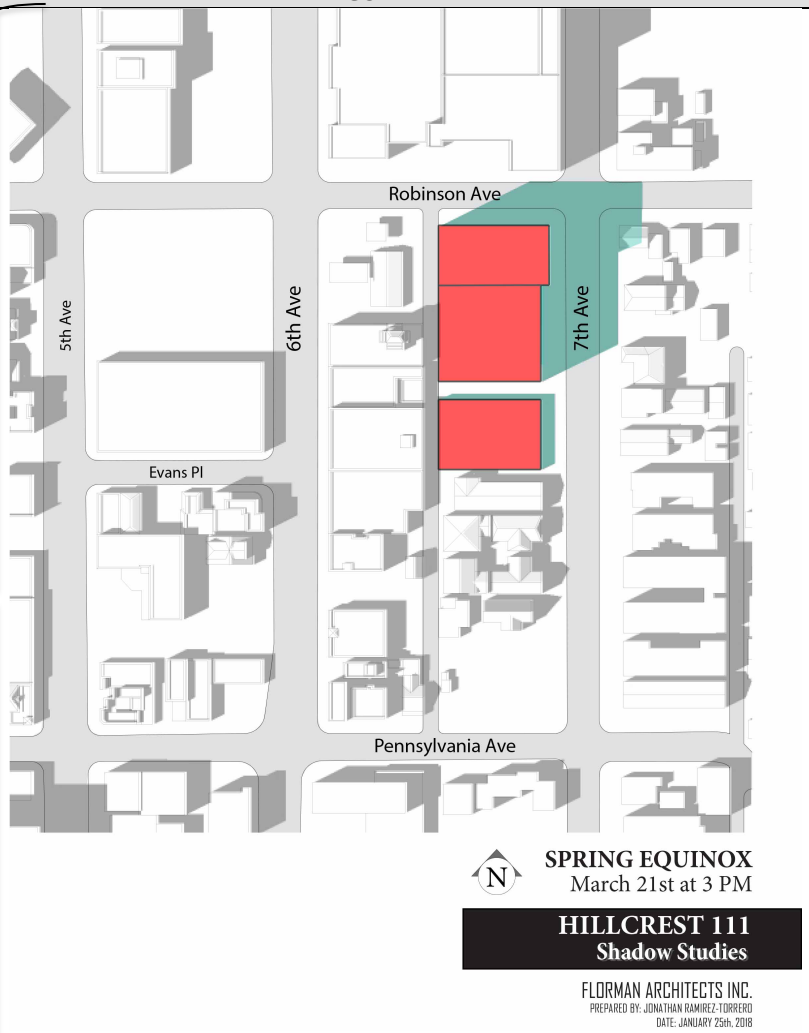
COMMENT	RESPONSE
	11:00 PM Friday, 12:00 PM to 11:00 PM Saturday, and 12:00 PM to 10:00 PM Sunday), Record City (operating hours 11:00 AM to 7:00 PM Monday through Saturday and 12:00 PM to 5:00 PM Sunday), Tippy Toes Nails and Spa (operating hours 10:00 AM to 7:00 PM Sunday through Thursday and 9:00 AM to 7:00 PM Friday and Saturday), and Zoo Hostel (assumed to operate under normal hostel hours). With the exception of the gas station and hostel, the businesses located to the west of the project site operate outside of the hours of shadow noted by the commenter as being between 8:00 AM and 10:00 AM. Gas station patrons are not likely to linger at the gas station during the hours of shadow to be affected by the proposed project. The hostel has minimal, if any, windows on the eastern elevation. Therefore, the proposed project's potential shadow would not affect these properties. The AT&T building is located to the north and northwest of the project site. This is a large building that ranges from one to five stories and has no windows on the southern elevation. Additionally, as noted in Response B-1, the City of San Diego Significance Determination Thresholds do not include a threshold related to shadow creation. **B-10** Comment noted. The commenter is correct, in that the proposed six- and seven-story mixed-use building would have cast greater shadow than the surface parking lot and one- and two-story buildings immediately east and south of the site. However, as noted above and in the MND, the project site is located within the commercial core of Hillcrest, which is characterized by a number of multi-story buildings, including the five-story AT&T building immediately north of the project site.

COMMENT	RESPONSE
Summary: A review of the Shadow Studies images, and the above observations, reveals that the proposed project, at 90 ft in height, would have significant shadow impacts on nearby properties, to the east, west, and north. One important gauge of the significant shadow impacts is this condition: **B-11** The proposed building would cast shadows on the residences to the east, starting with the western faces, for over half of the daylight hours after noon, for all four seasons. The significant shadow impacts shown on the graphic images, and described in this letter, could be expected to affect the aesthetic conditions and the desirability of the nearby properties. **B-12** The public realm would also be affected, with significant shadowing of streets, sidewalks, and potential new parks and plazas. *Tom Mullaney* Executive Director Uptown United Attachment: Shadow Studies, 5 pages Shadow Studies Page 3 of 3	**B-11** Based upon the analysis in the MND, the project would not result in significant impacts associated with aesthetics. As presented in Responses B-1 through B-10, the proposed project would add shadows that do not currently occur with the existing surface parking lot developed on the project site. However, shading would be of short duration and would occur in the late afternoon hours. The ever-changing shadows would be consistent with any urban environment made up of a mix of building types and heights with mature trees and landscaping. Furthermore, shading from the project would not preclude the use and efficiency of active solar apparatus. Additionally, as noted in Response B-1, the City of San Diego Significance Determination Thresholds do not include a threshold related to shadow creation. **B-12** The public realm would not be adversely affected by the proposed project. The project's landscape design, as described in Section I, Aesthetics, of the MND, would enhance the pedestrian experience by providing a noncontiguous sidewalk with landscaped parkway which would include shade trees and other plant material to provide a physical and visual buffer from vehicular traffic. Sidewalks would be shadowed during the times of the day typical in the project vicinity, which are already shadowed as a result of the urban environment. It is likely, therefore, that a pedestrian walking along project-fronting sidewalks would not be able to differentiate between the project's shadows and those present in the rest of the Hillcrest commercial core. The 2016 Uptown Community Plan Update identifies potential future parks throughout Uptown, including Hillcrest. There are no new parks or plazas planned for this area of Hillcrest identified in the Uptown Community Plan Update. Therefore, shadows of the proposed building would have no effect on potential new parks or plazas.

COMMENT	RESPONSE
B-13 	**B-13** Comment noted. These pages are the commenter's shadow study.

COMMENT	RESPONSE

B-13 (cont.)

COMMENT	RESPONSE
B-13 (cont.) 	

COMMENT	RESPONSE

UPTOWN UNITED
3636 4th Avenue, Suite 310
San Diego CA 92103
619-889-5626

January 25, 2018

(Via email)
Anna L. McPherson
Senior Environmental Planner
City of San Diego, Development Services Dept.

Re: Project name: Hillcrest 111. Project No. 522075
TRAFFIC IMPACTS

To the City of San Diego:

Summary: The Project seeks to insert a large 21st century building, with very high density, into a street and alley grid which was designed about 1910, for low density uses. This project would generate serious traffic problems. The MND analysis and proposed mitigation are flawed.

The items which are significant:

C-1 **1. The overall conclusions in the MND** are questionable. It defies logic to contend that the small mitigation measures will improve a segment LOS F to LOS C.

2. Center turn lanes are proposed for Robinson, at 7th Ave., as mitigation.

C-2 a. The MND creates a false comparison in claiming that a striped center lane will reduce impacts below a level of significance. Vehicles traveling east and west on Robinson already use the center of the street for turning onto 7th Avenue. The proposal is merely to add striping-- in essence to make the turn lane official.

C-3 b. The striped center lane would likely create a hazard. Traffic would not be able to move through the intersection at normal speeds.

i. The attached diagram shows that a vehicle would encounter parked cars a short distance after passing through the intersection. A jog would be necessary. This would create a hazard.

ii. Only a slow speed would be feasible, which detracts from the claim that a striped turn lane would significantly improve traffic flow.

iii. The solution for eliminating the jog would be to remove parking from the south side of Robinson Ave, east of 7th Ave. This should be part of the mitigation plan, rather than waiting until project completion, and an inevitable traffic impediment.

1

C-1 As stated in the MND, the project would generate 858 ADT, with 59 AM peak hour trips and 78 PM peak hour trips. Relative to traffic impacts, as concluded in the MND, the project would result in a significant direct and cumulative impact to the segment of Robinson Avenue between 6th Avenue and 7th Avenue. In order to mitigate significant traffic impacts to below a level of significance, the project would restripe the impacted segment of Robinson Avenue to provide a dedicated left turn lane on eastbound Robinson Avenue at 7th Avenue and dedicated left turn lane on westbound Robinson Avenue at the alley entrance to the parking garage, provide a separate left turn lane at the eastbound and westbound approaches at Robinson Avenue and 7th Avenue, and make the associated traffic signal modifications as identified by the City Engineer.

C-2 Robinson Avenue currently functions as a two-lane collector with no center turn lane. Per the City Traffic Impact Study Manual, this roadway has a capacity of 8,000 vehicles per day. The Manual states that a collector with a continuous left turn lane has a capacity of 15,000 vehicles per day. By adding the continuous left turn lane and providing striped left turn pockets, the calculation of volume to capacity that is used in computing the segment LOS results in the change from LOS F to LOS C.

C-3 The striping changes proposed on Robinson Avenue would define how left turning movements should occur at 7th Avenue and at the alleyway. Adding a defined center turn lane by eliminating on-street parking on this block, provides a space for turning vehicles so they would not impede the movement of east-west through traffic on Robinson. Currently, turning vehicles must wait for a gap in the opposing traffic flow. Without a separate turn lane, this delays the through movement of traffic. The center turn lane results in the ability for more continuous east-west traffic flow.

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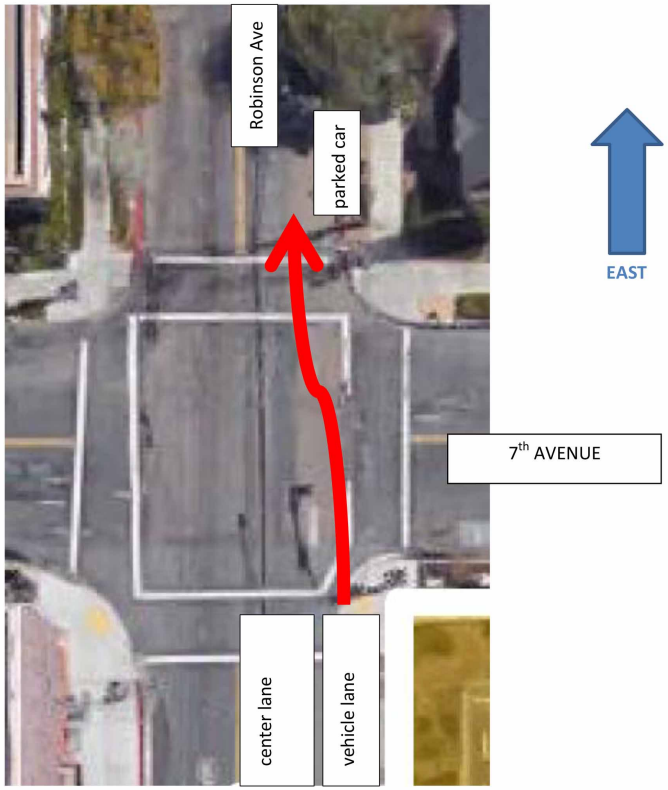
	Similar to the turn lanes that exist at 6th Avenue, for the eastbound movement at 7th Avenue, the project would add a turn lane for the westbound movement at 7th Avenue that improves traffic operations, reduces delay, and provides for consistent travel speed along the corridor. The continuous left turn lane providing access at the alley would do the same. The eastbound movement through the 7th Avenue intersection would also improve, as on-street parking is removed from the front of the project at the intersection. The "jog" referenced in the comment reflects an anticipated offset that motorists would encounter as the striping changes on either side of 7th Avenue. In this situation, there would be sufficient distance for the "jog" to be made. The speed limit in this area is 25 miles per hour and would not be expected to change as a result of the new turn pockets. The MND states that, with the proposed mitigation, level of service would improve from LOS F to LOS C, thus reducing direct and cumulative traffic impacts to less than significant. The mitigation results in reducing travel delay (time spent not moving as a result of turning vehicles), which results in improved traffic flow and lower travel times through the corridor. The mitigation allows more vehicles to move through the corridor in a given time period and does not increase the speed at which vehicles are moving.

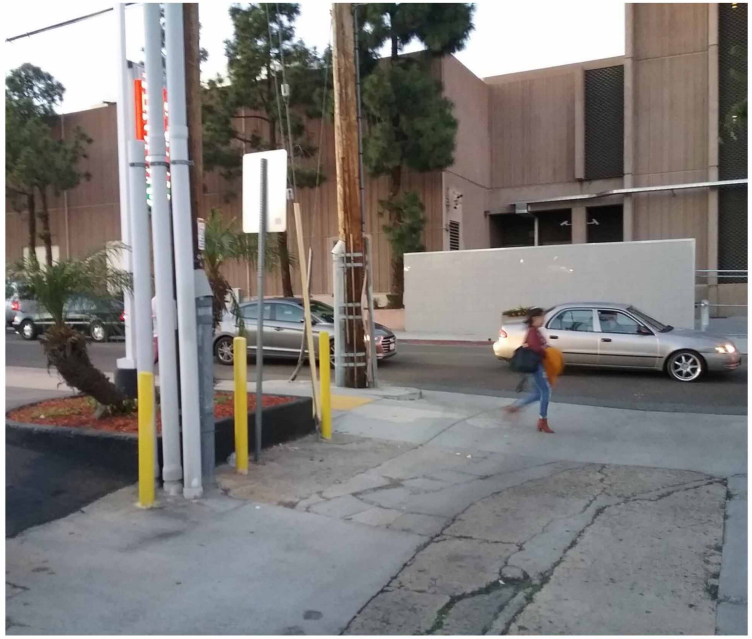
	COMMENT	RESPONSE
C-4	c. The MND proposes the striping of a center lane on Robinson in <u>both directions</u>. Such a lane is not feasible going <u>westbound</u>. Robinson, at 40 ft wide, is too narrow to include two travel lanes, a parking lanes, and a center lane. The mitigation should include removal of parking on the south side of Robinson, east side of 7th Ave.	**C-4** The Traffic Assessment (Appendix I to the MND) includes a sketch of the proposed striping. It shows extension of the left turn bays provided at 6th Avenue and 7th Avenue to create a continuous left turn lane. This will provide turn access into the alley. It also shows adding a left turn bay for westbound movement, to match the existing turn bay for the eastbound movement, forming a consistent center turn lane from east of 7th Avenue to west of 6th Avenue. This improvement would remove parking on Robinson Avenue, between 6th Avenue and 7th Avenue, resulting in the loss of three two-hour parking stalls on the south side of Robinson Avenue and two two-hour parking stalls on the north side of Robinson Avenue. The three spaces on the south side of Robinson Avenue would also be required to be eliminated to allow for fire accessibility. A commercial loading zone would also be removed on the north side of Robinson Avenue and relocated to 7th Avenue north of Robinson Avenue. This also requires the elimination of two parking meters.
	3. Intersection of the alley and Robinson.	
C-5	a. **Corner visibility.** See attached photo. When exiting the alley onto Robinson, there are two group of poles to the west, which seriously impede visibility. The poles should be relocated or eliminate by undergrounding.	**C-5** The proposed project would underground overhead utilities (high and low voltage) along the south side of Robinson Avenue, from 6th Avenue to 7th Avenue. The project would also remove and rehang utilities along the alleyway – removing poles along the east side of the alleyway and hanging those overhead utilities off the existing poles that will remain in place along the west side. The commenter's photo suggests that there is adequate sight distance to the west for drivers exiting the alley.
C-6	b. **Turning room.** The attached photo illustrates the difficulty of turning from a narrow street, Robinson, into a narrow alley, 20 ft wide. A solution would be widening the alley, and removal of the utility poles. These solutions must be done at the time of the project, when they are feasible.	**C-6** The alleyway is 20 feet wide and built to City width standards.
C-7	c. **Width of garage entrance**. This appears to be inadequate to accommodate all traffic to the 111 housing units and the commercial spaces (including delivery and customers).	**C-7** The garage entrance has been designed to Land Development Code standards. The driveway width accessing the garage is 24 feet.
	4. Solutions. The following changes would avoid the adverse conditions:	
	a. A scaled-down project which would result in less traffic.	
	b. Widening Robinson by moving the curb southward. This would facilitate a viable center turn lane onto 7th Ave. It would allow turning room for traffic entering and exiting the alley. It would also allow a future bike lane.	
C-8	c. A larger setback of the building from the lot line on Robinson, to improve corner visibility for alley traffic and 7th Ave traffic.	**C-8** a. Comment noted. As analyzed in the MND, the project would result in a significant traffic impact on a segment of Robinson Avenue between 6th Avenue and 7th Avenue. That impact would
	d. Widening the alley to allow vehicles feasible access from Robinson Ave, and from the parking garage.	
	e. Relocating or removing power poles.	
	f. Removing parking spaces where needed to allow safe traffic movement.	
	Tom Mullaney Uptown United	
	Attachments: Three photos.	
	2	

COMMENT	RESPONSE
	be mitigated to below a level of significance by restriping the impacted segment of Robinson Avenue, providing a separate left turn lane at the eastbound and westbound approaches at Robinson Avenue and 7th Avenue, and the associated traffic signal modifications. b. The project's mitigation for significant traffic impacts includes the removal of on-street parking between 6th Avenue and 7th Avenue. This provides sufficient width for two through lanes and a center left turn lane. No additional widening is needed to provide this cross section. In addition, widening on the south side would create an offset of the eastbound travel lane across the 7th Avenue intersection. c. The project meets sight distance requirements. d. As previously noted, the alleyway is built to City width standards, and the project does not propose to widen the alley. e. Relative to relocating or removing power poles, the proposed project would underground overhead utilities (high and low voltage) along the south side of Robinson Avenue, from 6th Avenue to 7th Avenue. The project will also remove and rehang utilities along the alleyway – removing poles long the east side of the alleyway and hanging those overhead utilities off the existing poles that will remain in place along the west side. f. Relative to removal of on-street parking, parking spaces on the south side of Robinson Avenue adjacent to the project are being removed as part of the project, as are several on the north side of Robinson Avenue. Mitigation for traffic impacts would remove parking on Robinson Avenue, between 6th Avenue and 7th Avenue, 7th Avenue, resulting in the loss of three two-hour parking stalls on the south side of Robinson Avenue, two two-hour parking stalls on the north side of Robinson Avenue, and two to three parking stalls on the south side of Robinson

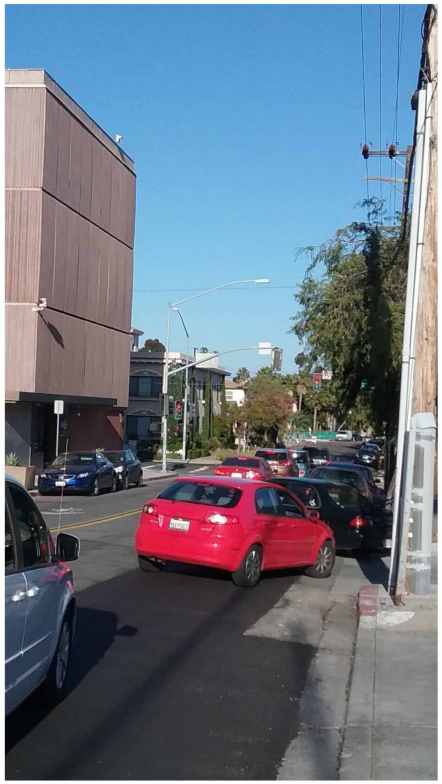
COMMENT	RESPONSE
	Avenue immediately east of 7th avenue. A commercial loading zone would also be removed on the north side of Robinson Avenue and relocated to 7th Avenue, north of Robinson Avenue, which would eliminate one to two metered parking spaces. See Figure 4 in Appendix I (7th & Robinson Traffic Assessment).

COMMENT	RESPONSE
Intersection of Robinson Ave and 7th Ave. DANGER! Problem: Striping a center turn lane on Robinson would force eastbound traffic to the side of the street. While passing through the intersection, vehicles would need to angle to the left, to avoid parked cars. Speed would have to be reduced. A driver focused on the intersection and crosswalks might not see the parked cars. Solution: Remove parking spaces on Robinson, east of 7th Ave.  3	**C-9** These pages are attachments to Comment Letter C.

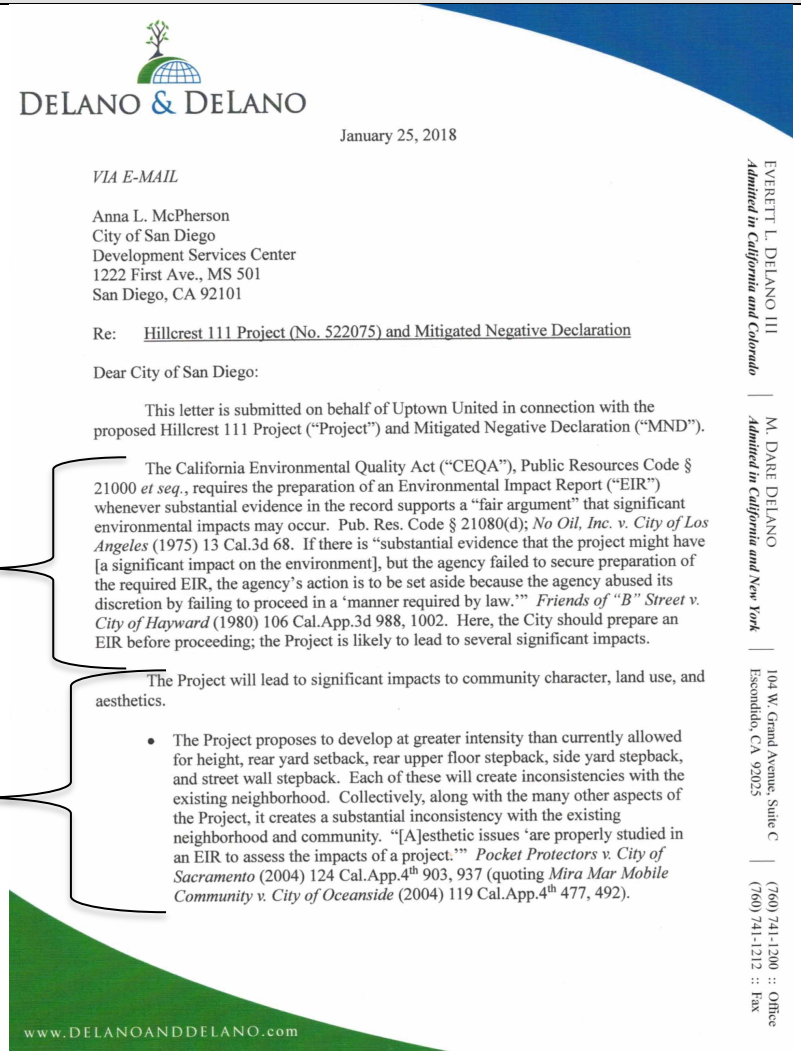
C-9

COMMENT	RESPONSE
Visibility exiting alley. Two groups of utility poles.  4	

C-9 (cont.)

COMMENT	RESPONSE
C-9 (cont.) **TRAFFIC CONFLICT, ENTERING & EXITING ALLEY**  Uptown United comment 522075 Traffic-C.pdf 5	

COMMENT	RESPONSE



DELANO & DELANO

January 25, 2018

VIA E-MAIL

Anna L. McPherson
City of San Diego
Development Services Center
1222 First Ave., MS 501
San Diego, CA 92101

Re: Hillcrest 111 Project (No. 522075) and Mitigated Negative Declaration

Dear City of San Diego:

This letter is submitted on behalf of Uptown United in connection with the proposed Hillcrest 111 Project ("Project") and Mitigated Negative Declaration ("MND").

D-1

The California Environmental Quality Act ("CEQA"), Public Resources Code § 21000 *et seq.*, requires the preparation of an Environmental Impact Report ("EIR") whenever substantial evidence in the record supports a "fair argument" that significant environmental impacts may occur. Pub. Res. Code § 21080(d); *No Oil, Inc. v. City of Los Angeles* (1975) 13 Cal.3d 68. If there is "substantial evidence that the project might have [a significant impact on the environment], but the agency failed to secure preparation of the required EIR, the agency's action is to be set aside because the agency abused its discretion by failing to proceed in a 'manner required by law.'" *Friends of "B" Street v. City of Hayward* (1980) 106 Cal.App.3d 988, 1002. Here, the City should prepare an EIR before proceeding; the Project is likely to lead to several significant impacts.

D-2

The Project will lead to significant impacts to community character, land use, and aesthetics.

- The Project proposes to develop at greater intensity than currently allowed for height, rear yard setback, rear upper floor stepback, side yard stepback, and street wall stepback. Each of these will create inconsistencies with the existing neighborhood. Collectively, along with the many other aspects of the Project, it creates a substantial inconsistency with the existing neighborhood and community. "[A]esthetic issues 'are properly studied in an EIR to assess the impacts of a project.'" *Pocket Protectors v. City of Sacramento* (2004) 124 Cal.App.4th 903, 937 (quoting *Mira Mar Mobile Community v. City of Oceanside* (2004) 119 Cal.App.4th 477, 492).

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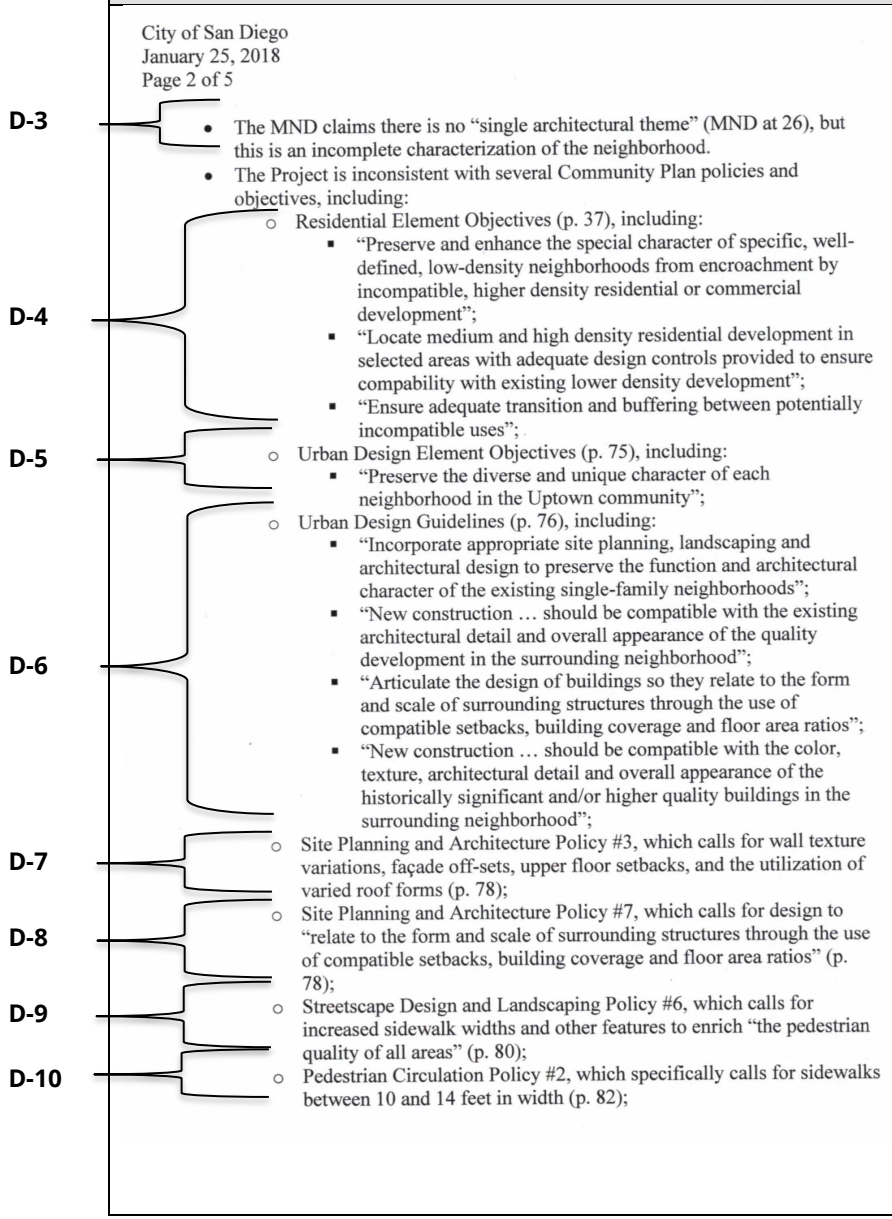
D-1 Comment noted. This comment provides reference to various sections of CEQA and does not address the adequacy of the MND.

D-2 As discussed in Question 8 of the Initial Study Checklist, and in Section X, Land Use and Planning, of the Initial Study Checklist, the proposed project would utilize two incentives allowed by the provision of affordable housing on-site. One incentive is to deviate from the building height standard, with a maximum building height of 84 feet in the CN-1-A zone, where 65 feet is allowed, and 76 feet in the MR-800B zone, where 60 feet is allowed. The second incentive is for setbacks, including rear yard setback (alley), rear yard upper floor step back – third floor and above (alley), side yard upper floor step back – third floor and above (south elevation), and street wall step back for a portion of structure over 36 feet (Robinson Avenue). Consistent with the Land Development Code, these incentives allow for the project to develop 111 multi-family units (including nine very-low income units) and commercial space, while also providing architectural variation through offsetting planes and varying roof heights to implement the Urban Design policies of the Uptown Community Plan.

Furthermore, the Commercial Element of the 1988 Community Plan identifies mixed-use development areas, including the northern portion of the project area, and states that building heights should range from high-rise to two stories. The proposed project height ranges from 13 feet to 84 feet, in accordance with the mixed-use description in the Commercial Element. Additionally, this building profile mirrors existing developments within the vicinity of the proposed project.

Section I, Aesthetics, of the Initial Study Checklist, addresses aesthetic impacts, including whether the proposed project would substantially degrade the existing visual character or quality of the site and its surrounding buildings. As analyzed in this section, the project site is located within the urbanized Hillcrest

COMMENT	RESPONSE
	neighborhood, with an eclectic variety of buildings in the immediate surroundings, including one- and two-story single-family and multi-family residential buildings; the AT&T facility, which has a height of roughly five stories and no massing step-backs; and one- and two-story commercial buildings with no massing step-backs and minimal setbacks, one of which includes a multi-story tower structure. The project proposes a maximum height of seven stories, with a variety of step-backs, setbacks, and offsetting planes, which provides a cohesive transition between lower-scale development to the south and east and more intense urban development to the north and west. The proposed AT&T parking structure would result in a visual change to the site in terms of scale and character. The AT&T parking structure would provide a buffer and transition between the existing residential developments to the south and the mixed-use building of the project. Construction of a subterranean parking structure to replace a surface parking lot and construction of a shade structure as part of the proposed parking garage would not substantially degrade the visual character or visual quality. The construction of the parking structure proposes materials which blend with the project's main building, as well as surrounding buildings. The proposed garage would not significantly degrade the existing visual character or quality of the site and its surrounding.

COMMENT	RESPONSE
	**D-3** As stated in Section I, Aesthetics, of the MND: "Surrounding residential development exhibits craftsman, Spanish, and contemporary architecture, while the commercial components of the surrounding exhibit traditional box-like architecture with little articulation or visual interest. There is no single or common architectural theme that applies to the whole of the project surroundings. As such, the proposed project would not have an architectural style or use building materials in stark contrast with adjacent developments of a single or common architectural theme." Comment D-3 is a partial quote that does not fully represent the text from which the quote was excerpted. As stated above in Letter B from Save Our Heritage Organisation, "[t]here is an existing character in this portion of the Hillcrest neighborhood that the Hillcrest 111 project makes no reference toward, which is a mix of 20th century styles[…]." As noted in Response A-2, a reference to the "mix of 20th century architectural styles" has been added to the MND. **D-4** Bullets 1 and 2 from the Residential Element of the Community plan (page 37) address areas designated for low-density development in the Uptown community. The 1988 Community Plan recommends mixed-use development at very high residential densities for the project site and adjacent properties. The project is consistent with the 1988 Uptown Community Plan land use designation of Residential High Density and Mixed Use commercial, Bullet 3 does not apply. The Urban Design Element of the Community Plan provides guidelines for improving the design character and appearance of the Hillcrest community. The element describes Hillcrest as diverse and unique with building heights and massings ranging from single-family homes to high density residential towers and architectural styles that span the development history of Hillcrest. The plan states medium- to high-density development should incorporate height, depth, and wall texture variations, façade off-set and upper floor setbacks. The proposed project design conforms to these recommendations as described in the

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- The MND claims there is no "single architectural theme" (MND at 26), but this is an incomplete characterization of the neighborhood.
- The Project is inconsistent with several Community Plan policies and objectives, including:
  - Residential Element Objectives (p. 37), including:
    - "Preserve and enhance the special character of specific, well-defined, low-density neighborhoods from encroachment by incompatible, higher density residential or commercial development";
    - "Locate medium and high density residential development in selected areas with adequate design controls provided to ensure compability with existing lower density development";
    - "Ensure adequate transition and buffering between potentially incompatible uses";
  - Urban Design Element Objectives (p. 75), including:
    - "Preserve the diverse and unique character of each neighborhood in the Uptown community";
  - Urban Design Guidelines (p. 76), including:
    - "Incorporate appropriate site planning, landscaping and architectural design to preserve the function and architectural character of the existing single-family neighborhoods";
    - "New construction … should be compatible with the existing architectural detail and overall appearance of the quality development in the surrounding neighborhood";
    - "Articulate the design of buildings so they relate to the form and scale of surrounding structures through the use of compatible setbacks, building coverage and floor area ratios";
    - "New construction … should be compatible with the color, texture, architectural detail and overall appearance of the historically significant and/or higher quality buildings in the surrounding neighborhood";
  - Site Planning and Architecture Policy #3, which calls for wall texture variations, façade off-sets, upper floor setbacks, and the utilization of varied roof forms (p. 78);
  - Site Planning and Architecture Policy #7, which calls for design to "relate to the form and scale of surrounding structures through the use of compatible setbacks, building coverage and floor area ratios" (p. 78);
  - Streetscape Design and Landscaping Policy #6, which calls for increased sidewalk widths and other features to enrich "the pedestrian quality of all areas" (p. 80);
  - Pedestrian Circulation Policy #2, which specifically calls for sidewalks between 10 and 14 feet in width (p. 82);

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	Section I Aesthetics of the Initial Study Checklist. Section I, Aesthetics, of the Initial Study Checklist, addresses aesthetic and neighborhood character. As concluded in Section I, although the project would result in a higher-density use than what exists currently, the proposed project would not result in a significant impact due to building articulation, pedestrian-treatments at the ground level, and the varied urban character of the Hillcrest commercial core, centered on University Avenue and 5th Avenue, within which the project site is located. The project's design elements provide transition and buffer between the proposed project and lower-scale development to the south and east. Buffer and transition is additionally facilitated by the proposed below-grade AT&T parking structure, located on the southern portion of the site, which would have an above-grade structure height of 13 feet (to enclose the entry to the garage) and total development height of 21 feet, six inches, when the baja canopy is included within the height calculation. The height of this structure would be consistent with surrounding residential heights of one and two stories and provides buffer space and transition between these single-family and multi-family developments and the proposed project's mixed-use structure. As indicated in Question 6 of the Initial Study Checklist, the project site is designated "Residential-High Density and Mixed-Use Commercial" in the 1988 Uptown Community Plan – the community plan under which the project was submitted and reviewed. Therefore, the project "locate[s] medium and high density residential development in selected areas", i.e. in an area where high density residential development is anticipated by and designated in the Uptown Community Plan. The proposed project is also consistent with the mixed use residential/commercial objective that encourages incentives be granted for mixed residential/commercial development (page 77) in the Uptown community. Deviations from setback and building height are allowed through project incentives for

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	providing affordable housing on-site. **D-5** The project site is currently developed as a surface parking lot, which is not an element of community character which is identified to be preserved. See also Response D-4. **D-6** MND Pages 25 through 28 of Section I, Aesthetics, addresses project compatibility with surrounding development, to include site planning, landscaping, and architecture design. As discussed in Section I and addressed above in Response D-4, site planning of the proposed project locates the lowest scale portion of the project adjacent to residential developments located to the south and southwest. This portion of the project would house the below-grade AT&T parking garage, which has an above-grade structure height of 13 feet (which allows for enclosed vehicle access at the street level), with total building height reaching 21 feet, six inches with incorporation of the baja canopy structure. This building height is compatible with existing one- and two-story single-family and multi-family buildings that occur in the surrounding environment. The above grade portion of the structure is setback and in-line with the existing development to the south, providing approximately 20 feet of landscaped street yard. Landscaping exceeds the minimum street yard area and points required by the Land Development Code for commercial and residential development. Project landscaping includes solutions to address the unique needs of mixed-use development, which include: a pedestrian-friendly streetscape, verdurous landscaping in tiered planters along residential use frontages, and evergreen screening for the adjacent parking structure. Architectural features at the ground floor pedestrian level would include entry porches for residential units, brick veneer, metal and fabric awnings, metal canopies, porcelain tile with faux wood finish, anodized storefront glazing, and perforated metal accents. Architectural features of the building would include multiple pitched roofs, a minimum of one transom window on the top

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	floor, windows recessed at least two inches, and eaves with a minimum overhang of 18 inches. Materials for the building include porcelain tile with faux corten steel and faux wood finish; plaster; bay windows; vinyl windows; metal elements, including horizontal metal slats, metal louvers, metal shade structures, and perforated metal accents; and glass railings. As such, City staff determined that the project design implements the 1988 Uptown Community Plan's Urban Design Guidelines. **D-7** The proposed project is consistent with Site Planning and Architectural Policy #3 of the 1988 Uptown Community Plan. Wall texture variations of the proposed project would include variety of finishes, including brick veneer, porcelain tile with faux corten steel finish, exterior plaster in complementary colors, and porcelain tile with faux wood finish. These wall textures and colors accentuate façade offsets, which range from one to ten feet. The project incorporates upper floor stepbacks of ten feet on Robinson Avenue. The project would include stepped building heights with multiple pitched roofs. **D-8** The policy stated by the commenter pertains to Hillside and Open Space development. The project is in the Urban Core of Uptown and in an area under transition. The project provides a stepback from Robinson Avenue above three stories. Additionally, the proposed project relates to the form and scale of surrounding development through buffers and architectural features. Buffer and transition is facilitated by the below-grade AT&T parking structure, located on the southern portion of the site, which would have an above-grade structure height of 13 feet and total development height of 21 feet, six inches, when baja canopy is included within the height calculation. The height of this structure would be consistent with surrounding residential heights of one and two stories and provides buffer space and transition between these single-family and multi-family developments and the proposed project's mixed-use

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	structure. Project design and architectural features are illustrated in Figures 2 through 6 of the MND. Illustrative elevations for the eastern and southern elevations, which face existing single-family and multi-family development, are shown in Figure 3 and Figure 6, respectively. Architectural features and materials of the eastern and southern elevations include offsetting planes with a variety of finishes, including brick veneer, porcelain tile with faux corten steel finish, exterior plaster in complementary colors, and porcelain tile with faux wood finish; stepped building heights with multiple pitched roofs; bay windows; entry porches on the street level; metal and fabric awnings; and various metals components. **D-9** The project provides increased sidewalk widths over the existing five-foot wide sidewalk on Robinson Avenue and the six- and five-foot wide sidewalks on 7th Avenue. The project includes a 7.5-foot wide noncontiguous sidewalk width, with a five-foot wide landscaped parkway along Robinson Avenue. For 7th Avenue, a five-foot wide noncontiguous sidewalk would be provided with a 5.5-foot wide landscape parkway. The proposed project would enhance the pedestrian experience along Robinson Avenue and 7th Avenue by providing a varied landscape palette, to include a parkway of street trees, incorporating ground floor entries to residential and commercial units, and providing a variety of finishes and materials at the pedestrian level. Landscaping exceeds the minimum street yard area and points required by the Land Development Code for commercial and residential development. The policy in the Community Plan (page 80) states that sidewalk widths shall be increased when appropriate. The project is consistent with this policy as the sidewalk on Robinson Avenue is widened to 12.5 feet of right-of-way, with street trees in grates. **D-10** Pedestrian Circulation Policy 2 of the Community Plan states: *Adequate sidewalk and parkway areas should be provided. Except*

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	where there are physical or topographical constraints, the minimum curb-to-property line [along] width should be ten feet; twelve to fourteen feet or more should be provided in high activity areas. Additionally, the policy in the Community Plan (page 80) states that sidewalk widths shall be increased when appropriate. The project site is not located in a high activity area. The project's sidewalk and parkways are in conformance with Policy 2. The project includes a 7.5-foot wide noncontiguous sidewalk width, with a five-foot wide landscaped parkway along Robinson Avenue for a curb-to-property line width of 12.5 feet. For 7th Avenue, a five-foot wide noncontiguous sidewalk would be provided with a 5.5-foot wide landscape parkway for a curb-to-property line width of 10.5 feet.

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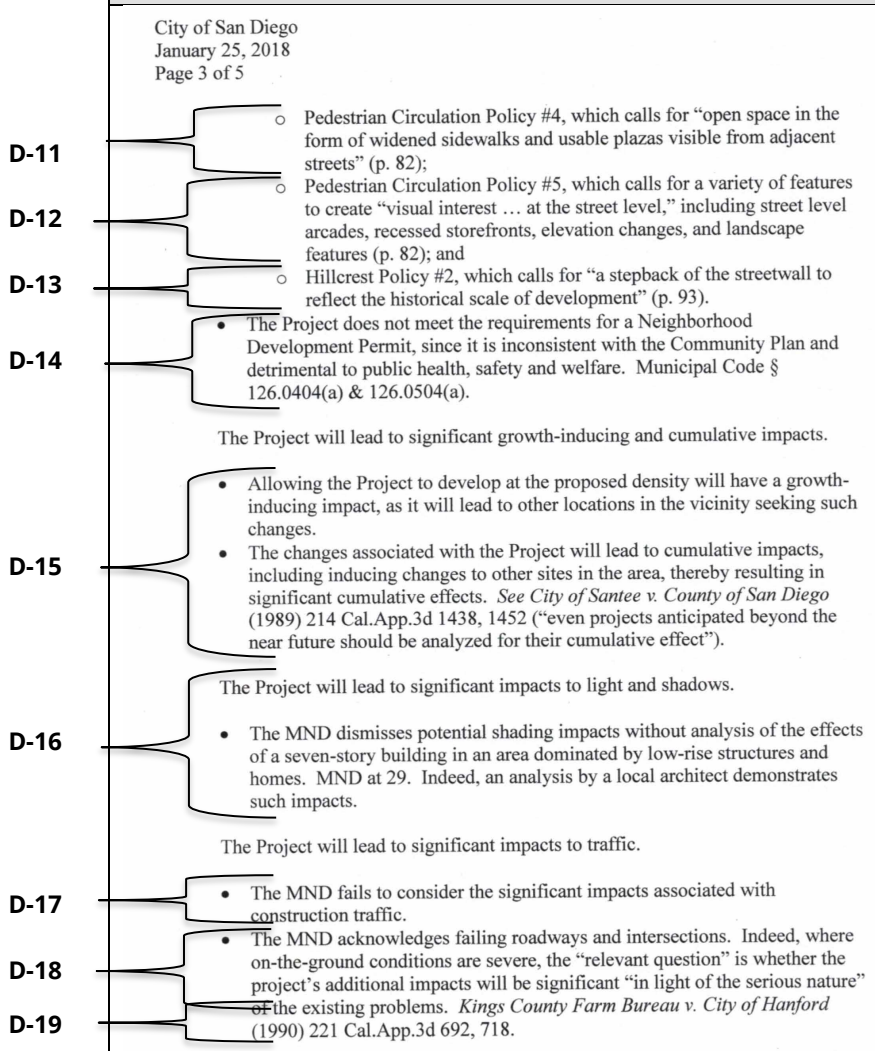	**D-11** The project would adhere to this policy by incorporating a widened noncontiguous sidewalk with a 7.5-foot wide noncontiguous sidewalk width, with a five-foot wide landscaped parkway along Robinson Avenue. For 7th Avenue, a five-foot wide noncontiguous sidewalk would be provided with a 5.5-foot wide landscape parkway. In order to address the pedestrian realm and to stay consistent with the pattern of development established elsewhere in the commercial core of Hillcrest, the project does not propose any public plazas at the ground level. Rather the project addresses this policy by providing for the widened sidewalk and landscaped parkway, as indicated. The project does include a second-level courtyard for residents, which provides for open space area above and a visual break in the building form within the vicinity of the pedestrian. **D-12** The proposed project incorporates a variety of features at the pedestrian level to create visual interest and promote pedestrian use. These include architectural elements, such as entry porches along Robinson Avenue and 7th Avenue, expansive storefront windows for the commercial uses, metal canopies, and varied wall materials. The proposed project includes a sidewalk with landscaped parkway, as well as an extensive landscaping palette, summarized in Section I.c, Aesthetics, of the MND. The streetscape is characterized by large, evergreen, canopy-form trees adjacent to the curbs along Robinson and 7th Avenues. Street trees are provided at a rate of one tree for every 30-feet of linear street frontage, as required by the Landscape Regulations. Planted at 36-inch box size (which is larger than the required 24-inch box size), species include Acacia pendula or fruitless Olea europea along Robinson Avenue and Jacaranda mimosifolia along 7th Avenue as per the Street Tree Plan of the Uptown Community Plan. Trees on Robinson Avenue can reach a mature height/spread of 25-feet to 35-feet, while those on 7th Avenue can reach a height/spread of 35-feet to 50-feet. In addition to the street trees, a parkway planting strip with drought-tolerant groundcovers would run the entire length of the 7th Avenue street frontage, creating a non-contiguous

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	sidewalk and further improving the streetscape scene. Landscaping exceeds the minimum street yard area and points required by the Land Development Code for commercial and residential development. Where residential uses of the proposed project front 7th Avenue, the landscape enhances the pedestrian experience, visually softens the building mass from the right-of-way, and provides a buffer for residents at the lower levels. Evergreen accent trees are proposed on the private property, providing additional canopy coverage over the sidewalk. Tiered planters are designed with a selection of flowering and evergreen shrubs, which provide a visual transition for the grade change from sidewalk to unit entry. Additionally, a podium level deck directly above the street-level units, opens up to face 7th Avenue. Tall palm specimens and accent canopy trees planted at the podium level will be visible from the public right-of-way, further softening views of the tower façade. **D-13** The project is stepped back ten feet at Robinson Avenue for stories above the third floor. As stated in previous responses, consistent with City regulations, the proposed project would utilize two incentives allowed by the provision of affordable housing on-site. The applicant has chosen to not step-back on 7th Avenue as one of those incentives. **D-14** The comment does not identify any reasons to support the claim that the project is "detrimental to public health, safety, and welfare." As analyzed in the project MND, Section VIII, Hazards and Hazardous Materials, the proposed project would not result in significant impacts relative to health and safety. As discussed in Section VIII, the proposed project would not involve the routine transport, use, or disposal of hazardous materials. The proposed project would not create a significant hazard to public health or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. The proposed project would not emit

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	hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. The proposed project would not be located on a site which is included on a list of hazardous materials sites. The proposed project is not within the vicinity of a private airstrip and would be in compliance with the Airport Land Use Compatibility Plan for San Diego International Airport. **D-15** As concluded in Section XIII, Population and Housing, the project proposes the development of 111 residential units. The project density is consistent with the underlying zoning and the 1988 Community Plan. It does not involve the extension of roads or services, as the project is an infill project located within an existing urban community. Therefore, the project would not induce substantial population growth in the area and no impact would result. **D-16** See responses B-1, and B-4 – B-10, above. **D-17** Construction traffic would include trucks bringing in building materials and construction crews. As discussed in Section XVI, Transportation/Traffic, the project would generate 858 net daily trips. Construction would result in less traffic than the proposed project. Therefore, the traffic analysis of the proposed project covers the traffic associated with construction. See also Responses to Letter C, above. **D-18** As concluded in Section XVI, Transportation/Traffic, the proposed project would not result in significant unmitigated impacts to traffic. See also responses C-1 – C-8, above. **D-19** As concluded in Section XVI, Transportation/Traffic, the proposed project would not result in significant unmitigated impacts to traffic. See also responses C-1 – C-8, above.

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The Project will lead to significant impacts to air quality.

- **D-21** The MND claims the Project is consistent "with the growth anticipated by local plans." MND at 31. Yet the MND elsewhere acknowledges that the Project is being processed pursuant to the 1988 Community Plan. *Id.* at 20.
- **D-22** The MND attempts to separate air emissions into construction and operational phases. MND at 32 – 34. However, it fails to account for the fact that such phases can overlap, thereby increasing the amounts of emissions at any given time.

The Project will lead to significant impacts to soils and geology.

- **D-23** The MND acknowledges "undocumented fill" on the site, but fails to provide adequate explanation for the observed groundwater on-site. MND at 41 – 42.

The Project will lead to significant impacts to greenhouse gas emissions.

- **D-24** The goal of the City's Climate Action Plan ("CAP") – to "Promote effective land use to reduce vehicle miles traveled" – is implemented by Action 3.6, which includes the following: "Achieve better walkability and transit-supportive densities by locating a majority of all new residential development within Transit Priority Areas," CAP at 39. This mandate includes achieving "better walkability and transit-supportive densities by locating a majority of all new residential development within Transit Priority Areas." *Id.* The Project fails to address these requirements.
- **D-25** The MND averages construction emissions over the life of the Project. Such emissions should be calculated as they will actually occur, not averaged over a longer period of time. *See Taxpayers for Accountable School Bond Spending v. San Diego Unified School Dist.* (2013) 215 Cal.App.4th 1013, 1049.
- **D-26** On April 29, 2015, Governor Brown issued Executive Order B-30-15, which establishes a "new interim statewide greenhouse gas emission reduction target to reduce greenhouse gas emissions to 40 percent below 1990 levels by 2030 …." The MND does not address compliance with Executive Order B-30-15.

The Project will lead to significant impacts to noise.

- **D-27** The MND dismisses substantial construction noise impacts because they will be temporary. MND at 54. But the temporary nature of a noise impact does not make it insignificant. *See Berkeley Keep Jets Over the Bay Comm. v. Board of Port Commissioners* (2001) 91 Cal.App.4th 1344, 1380 – 81.
- **D-28** The Project's noise mitigation is vague and insufficient. *See Citizens for Responsible and Open Government v. City of Grand Terrace* (2008) 160 Cal.App.4th 1323, 1341 ("there is no evidence of any measures to be taken that would ensure that the noise standards would be effectively monitored and vigorously enforced").

D-21 Commenter is correct. The proposed project is consistent with the 1988 Uptown Community Plan under which the project is being processed, which was the community plan in effect at the time the project application was deemed complete.

D-22 It is possible that construction and operational phases would overlap, in the event that the AT&T parking garage (Phase 1) is operational prior to completion of the mixed-use building (Phase 2). However, due to the relatively low emissions associated with use of the parking garage, this would not compound emissions to above a level of significance. The project's emissions from construction are shown in Table 1, *Estimated Maximum Daily Construction Emissions*, which demonstrates that construction emissions would be below the San Diego Air Pollution Control District Pollutant Thresholds for Stationary Sources, as shown in Table A-2 of the City of San Diego California Environmental Quality Act Significance Determination Thresholds (July 2016) for air quality. Therefore, construction would result in a less than significant impact on air quality.

D-23 As presented in the *Geotechnical Investigation* included as Appendix A to the MND, based on the geotechnical exploratory boring conducted at the project site, groundwater was observed at a depth of approximately 83 below grade (approximately elevation 205). It is not anticipated that groundwater would be encountered during construction of the project, and foundation excavations would not extend to below the groundwater table. The *Geotechnical Investigation* concluded that "groundwater is not expected to be a constraint to site development."

D-24 The project site is located within a Transit Priority Area. Therefore, the project meets the Climate Action Plan goal of focusing growth within a TPA.

D-25 As stated in Section III of the MND, the analysis of air quality impacts related to construction is based on an assumption that

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	construction equipment would be used on-site for four to eight hours per day when construction is occurring, approximately 26 months. The project's emissions from construction are shown in Table 1, *Estimated Maximum Daily Construction Emissions***,** which demonstrates that construction emissions would be below the San Diego Air Pollution Control District Pollutant Thresholds for Stationary Sources, as shown in Table A-2 of the City of San Diego California Environmental Quality Act Significance Determination Thresholds (July 2016) for air quality. Therefore, construction would result in a less than significant impact on air quality. **D-26** Executive Order B-30-15 established a new interim Statewide GHG emissions reduction target. This target is embodied within the City's adopted Climate Action Plan, with which the project is consistent. **D-27** The MND discloses that construction noise could be significant. The project mitigates its construction noise impacts to below a level of significance with incorporation of mitigation measures NOISE-1 and NOISE-2. No significant noise impacts would result following mitigation. **D-28** Noise mitigation requires verification of construction noise attenuation on appropriate construction documents (NOISE-1); use of a "12-foot high temporary sound barrier [to] be installed along the southern boundary of the project site" which may be either "plywood with a total thickness of 1-1/2 inches or a sound blanker wall with a Sound Transmission Class (STC) rating of 27" with examples of acceptable noise blankets provided (NOISE-2); and "construction of a noise barrier, four feet in height relative to the pad elevation of the HVAC units, around the perimeter of the HVAC units located on the roof of the mixed-use building and the 7th floor of the mixed-use building" (NOISE-3). These mitigation measures are specific to location, time, and required design/materials and are sufficient to mitigate noise impacts.

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City of San Diego January 25, 2018 Page 5 of 5 The Project will lead to significant impacts to public services. • The General Plan requires several citywide services, including parks and recreation, open space, and trails. For example, the City's Recreation Element specifically requires the "[p]rovision of parklands that keep pace with population growth through timely acquisition and development." General Plan at RE-6. The Project will add substantial additional residents to the City, yet the MND fails to address these needs. The Project will lead to significant impacts to water supply. • The MND fails to identify how the Project will affect water supplies over a long period of time. "[A]n adequate environmental impact analysis for a large project, to be built and occupied over a number of years, cannot be limited to the water supply for the first stage or the first few years." *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal.4th 412, 430 – 32. For the foregoing reasons, Uptown United urges the City to reject the Project and MND as proposed. Feel free to contact me if you have questions or would like to discuss these concerns. Sincerely, Everett DeLano	**D-29** Based upon SANDAG population forecasts (Series 13) for the Uptown Community, the project could generate 1.74 persons per household, for an estimated total of 194, which is not a substantial increase. (The Series 13 2020 population forecast for the Uptown community is 39,810; as such, the proposed project would make up 0.005 percent of the total population of Uptown.) The proposed project addresses its parkland requirement through payment of in-lieu fees specifically calculated by the City to offset project park impacts where park space is not required to be provided on-site due to project size. **D-30** The project does not meet the requirements for a Water Supply Assessment, which is required for residential projects greater than 500 units. As summarized in Section XVIII.b., Utilities and Services, adequate services are available to serve the project because the proposed project is consistent with the 1988 Community Plan and would be served by existing water service from the City. City staff determined that the project would not require the expansion of water supply entitlements. Additionally, in compliance with the CAP, the project would utilize low-flow fixtures and appliances, diminishing project water demand. Project impacts would be less than significant.

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Anna L. McPherson Senior Environmental Planner City of San Diego, Development Services Center **Re: Project Name: Hillcrest 111. Project No. 52207. MND** January 25, 2018 Dear Ms. McPherson and City Staff, **E-1** I am a resident of Hillcrest and I am writing to express my concern regarding the proposed project referenced above, understanding that an NMD has been issued on the project. **E-2** The impact I am most concerned about is the risk to public safety caused by the lack of proper setbacks and the significantly increased traffic in a very narrow corridor of an already heavily trafficked area. Lack of proper setbacks (a fundamental of good city planning) and the increased traffic this structure will create tells me that the city is disregarding the safety of our residents. If this is not true, can you please provide me with an explanation to allay my concerns? Why are you ignoring proper setback rules (not to mention transition protocol in a "low rise" neighborhood)? The only conclusion I can draw is that they city is putting developer needs before that of tax paying residents. I believe the items being disregarded are basic neighborhood planning fundamentals. **E-3** I am also writing because I fear that this development will set a precedent for future development that excludes consideration of neighborhood residents and disregard for good neighborhood planning principles. **E-4** I am not a city-planning expert, but I have attended enough community meetings to understand that typical fundementals in neighborhood planning (setbacks, transitions) are being ignored in this case, where they are actually very relevant. I am hoping you can help me understand why or correct any misunderstanding I may have. Respectfully, Rick Dellacquila	**E-1** Comment noted. This comment is introductory and does not address the adequacy of the MND. **E-2** Comment noted. The project provides a 12.5-foot wide sidewalk and parkway along Robinson Avenue and 10.5-foot wide parkway on 7th Avenue. Pedestrian safety would be facilitated through the wide sidewalk, clearly demarcated vehicle entries, and a landscaped parkway that acts as a physical and visual buffer between pedestrians and motorists. As discussed in Section XVI, Transportation/Traffic, the project would generate 858 net daily trips and would result in a significant impact to the segment of Robinson Avenue from 6th Avenue to 7th Avenue. The TRANSPORTATION/TRAFFIC mitigation measure, which includes restriping the impacted segment of Robinson Avenue, providing a separate left turn lane at the eastbound and westbound approaches at Robinson Avenue and 7th Avenue, and the associated traffic signal modifications, would reduce potential impacts to below a level of significance. Project design incorporates features that provide stepbacks and transitions. Stepbacks are provided from Robinson Avenue on the project building above the third floor to allow pedestrian-level building interaction and diminish bulk and scale of the building outside the pedestrian realm. Along the southern property line, a 110-foot stepback is provided by keeping a low profile height of the above-grade portion of the parking structure to be comparable with the height of the adjacent development. A 20-foot wide landscaped setback is also provided along 7th Avenue to provide additional visual screening of the above-grade portion of the subterranean parking structure. **E-3** Comment noted. This comment does not address the adequacy of the MND.

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	E-4 As discussed in Section I, Aesthetics, the proposed project includes building articulation, pedestrian-treatments at the ground level. Additionally, project design incorporates features that provide stepbacks and transition. Stepbacks are provided from Robinson Avenue on the project building above the third floor to allow pedestrian-level building interaction and diminish bulk and scale of the building outside the pedestrian realm. Additionally, by locating the subterranean parking structure in the southern portion of the site, the project provides an expansive setback between developments to the south and southeast and the project's mixed-use component. There is a 20-foot wide landscaped setback of the above-grade portion of the subterranean parking structure (necessary to provide access to the parking), which allows for a 20-foot wide landscape area to provide additional setback and buffer. These design elements provide transition and buffer between the proposed project and lower-scale development to the south and east. Buffer and transition is additionally facilitated by the below-grade AT&T parking structure, located on the southern portion of the site, which would have an above-grade structure height of 13 feet and total development height of 21 feet, six inches, when baja canopy is included within the height calculation. The height of this structure would be consistent with surrounding residential heights of one and two stories and provides buffer space and transition between these single-family and multi-family developments and the proposed project's mixed-use structure. See also Response D-4 and Response D-6, above.

COMMENT	RESPONSE
January 25, 2018 (via email) Anna L. McPherson Senior Environmental Planner City of San Diego, Development Services Center **Re: Project Name: Hillcrest 111. Project No. 52207. MND** To the City of San Diego: Hello Anna, **F-1** I am under the impression that a very large building is about to receive your approval (**Project Name: Hillcrest 111. Project No. 52207. MND).** I live in the area and ride my bike down 7th Ave a lot. 7th Ave is the best way to get from Uptown to the west side of Balboa Park because 6th Ave is very narrow and a biker's nightmare. I try not to drive into Hillcrest unless I have to, but when I do, I occasionally find myself trying to navigate the intersection at 6th and Robinson. That intersection is extremely congested. Left turns from 6th to Robinson heading East are already restricted because there is no left turn lanes on 6th to Robinson heading East. I find it very hard to imagine how the traffic from a massive building is not going to impact the already congested traffic. **F-2** My understanding is that this project does not provide a place for moving truck and delivery vans to park. I've seen in building after building in the area where these trucks double park. On a two lane street that's not terrible but 7th is one lane so I hope someone has assessed the traffic impact when there's a moving truck parked in front of the building for 4+ hours. Having developers provide a loading and unloading area doesn't seem that unreasonable to me. **F-3** I also have an issue with the fact that there are no parks in Hillcrest. I imagine there will be people in this building with dogs and without any local park to walk to, they will have no choice but to let their dogs relieve themselves on the sidewalks in the immediate area. If local green spaces are not provided people are going to drive down to the dog park, further impacting the traffic problem. **F-4** As we move execute the plan to increase density in Hillcrest The City needs to find a way to add some pocket parks for the local residents. I understand that Hillcrest is one of the few (if not the only) neighborhood in San Diego that has NO parks. If this is something your department can correct it would be very much appreciated. **F-5** Specific to this project, but also to all of the pending projects coming to Hillcrest with the height limits allowed in the new community plan, we need to really assess traffic and density impacts and not just rubber stamp the projects that developers are bringing to you. Most of these developers don't have to live in this area and they don't know or don't care what happens here. Residents have no recourse except to hope The City can protect the character and integrity of our neighborhoods. You don't need to stop every project, but you do need to ensure developers make necessary design to minimize impacts. Changes like underground parking and green areas for pet parks. Sincerely, Susan Fosselman 4315 10th Ave San Diego, CA 92103	**F-1** Comment noted. As discussed in Section XVI, Transportation/Traffic, the project would generate 858 net daily trips and would result in a significant impact to the segment of Robinson Avenue from 6th Avenue to 7th Avenue. The Transportation/Traffic mitigation measure, which includes restriping the impacted segment of Robinson Avenue, providing a separate left turn lane at the eastbound and westbound approaches at Robinson Avenue and 7th Avenue, and the associated traffic signal modifications, would reduce potential impacts to below a level of significance. **F-2** As shown on Figure 2, Site Plan, the project provides designated truck loading space within the footprint of the building with access from the alley. No on-street loading is provided, as all loading would occur from the on-site, off-street designated loading area. **F-3** Comment noted. This comment does not address the adequacy of the MND. It should be noted, however, that the Hillcrest neighborhood includes the Cypress Canyon/Marston Open Space park, the northern finger of regionally-serving Balboa Park, which borders Hillcrest on the south. Additionally, the recently adopted Uptown Community Plan Update (2016), designates a number of park sites, including the Normal Street Linear Park and Sixth Avenue Pocket Park. The community also shares a boundary with the proposed First and Robinson Pocket Park and proposed Mystic Park. **F-4** Comment noted. See Response F-3, above. **F-5** Comment noted. This comment addresses larger community planning concerns and does not address the adequacy of the MND.

COMMENT	RESPONSE
January 25, 2018 Anna L. McPherson Senior Environmental Planner City of San Diego, Development Services Center DSDEAS@sandiego.gov RE: Hillcrest 111, Project No. 2207, MND Hello Anna McPherson, **G-1** I have been an Uptown resident for over 30 years and have been involved in "local" politics here for the past 3-4 years - mostly having to do with my concern with the number of new hi-rises in my Bankers Hill neighborhood (and all the street-level impacts, especially parking and pedestrian safety), the traffic snarls in Hillcrest and the 10-mph commutes on our freeways getting up to my solid-paying job in Del Mar that allows me as well as other Uptown residents to live here. **G-2** Without infrastructure enhancements, Hillcrest 111 will increase traffic and its negative impacts on the Hillcrest neighborhood - with air pollution, noise, congestion without even additional street parking. **G-3** The building height of Hillcrest 111 exceeds zoning, and I am curious as to the monthly rent in the "affordable units" that allow the developer to increase the building heights beyond the zoning limits. The mixed-use nature of this building - as with all recent high-rises - will have small businesses paying just minimum wage salaries. Please answer the following questions for me: **G-4** • Monthly rental cost of "affordable units" in Hillcrest 111 **G-5** • What is the minimum wage an affordable-unit resident will need to make to be able to afford to live in the building? **G-6** • What is the proposed monthly rental of the other units? **G-7** • Explain how Hillcrest 111 residents will access Robinson Street from the alley when access to Robinson (north and south) has been restricted by neon intersection signs at 5th and Robinson for the last 15-20 years, i.e., "no left turns allowed" from 3-6PM every day. **G-8** • What street enhancements have you planned to manage these increased number of cars in the neighborhood - all on their daily commutes to jobs mostly out of the area? **G-9** • How can residents compete with developers who always have their way with exceeding height limits in our neighborhoods? **G-10** • What options do residents have to influence ANY decisions of the San Diego Planning Department? [Attending meetings and voicing opinions have not proven successful.] **G-11** • On a personal level, how will I get over to Ralphs/Trader Joe's once Hillcrest 111 is complete? I understand there will be around 1,000 more trips/day on little Robinson Street with even more congestion on the horizon with this project.	**G-1** Comment noted. This paragraph provides introductory comment and does not address the adequacy of the MND. **G-2** Comment noted. This comment does not address the adequacy of the MND. As discussed in Section XVI, Transportation/Traffic, the project would generate 858 net daily trips and would result in a significant impact to the segment of Robinson Avenue from 6th Avenue to 7th Avenue. The TRANSPORTATION/TRAFFIC mitigation measure, which includes restriping the impacted segment of Robinson Avenue, providing a separate left turn lane at the eastbound and westbound approaches at Robinson Avenue and 7th Avenue, and the associated traffic signal modifications, would reduce potential impacts to below a level of significance. The project's effect on air quality is addressed in Section III of the Initial Study. As concluded in that section, the project would not result in significant air quality impacts. Noise impacts are addressed in Section XII of the Initial Study. As presented in Section XII and concluded in the MND, construction of the project is generally expected to comply with the City's noise limit. However, to ensure that sound levels do not exceed the thresholds of the ordinance, a temporary sound barrier along the south side of the project would be required for the duration of construction activities. Implementation of the sound barrier would mitigate the project's construction impacts to below a level of significance. **G-3** As discussed in Question 8 of the Initial Study Checklist, and in Section X, Land Use and Planning, of the Initial Study Checklist, consistent with City regulations, the proposed project would utilize two incentives allowed by the provision of affordable housing on-site. One of those incentives is to deviate from the building height standard, with a maximum building height of 84 feet in the CN-1-A zone, where 65 feet is allowed, and 76 feet in the MR-800B zone, where 60 feet is allowed. This incentive, in concert with the second incentive relative to setbacks, allows for the project to develop 111 multi-family units (including nine very-low income units) and commercial space, while also

COMMENT	RESPONSE
	providing architectural variation through offsetting planes and varying roof heights to implement the Urban Design policies of the Uptown Community Plan. Monthly rent of the affordable units is determined by the Housing Commission each year, based on Average Median Income, and is not relevant to the adequacy of the MND, as economics are not environmental impacts studied under CEQA. Under CEQA, economic or social effects are not considered significant effects on the environment. Rather, these effects are considered in the context of their potential linkage or indirect connections between the proposed project and physical environmental effects. CEQA Guidelines Section 15131(a). The physical effects of the project have been addressed in the MND. **G-4** Comment noted. Please refer to Response Number G-3. **G-5** Comment noted. The wage of residents is not relevant to the adequacy of the MND, as economics are not environmental impacts studied under CEQA. Please refer to Response Number G-3. **G-6** Comment noted. Unit monthly rental is not relevant to the adequacy of the MND, as economics are not environmental impacts studied under CEQA. Please refer to Response Number G-3. **G-7** Comment noted. This comment does not address the adequacy of the MND; however, for purposes of responding to the commenter's question, residents would either turn north on the alley to Robinson Avenue or turn south on the alley to Pennsylvania Street. **G-8** The TRANSPORTATION/TRAFFIC mitigation measure, which includes restriping the impacted segment of Robinson Avenue, providing a separate left turn lane at the eastbound and westbound approaches at Robinson Avenue and 7th Avenue,

COMMENT	RESPONSE
	and the associated traffic signal modifications, would reduce potential impacts to below a level of significance. See also Responses to Letter C, above. **G-9** Comment noted. This comment does not address the adequacy of the MND. **G-10** Comment noted. This comment does not address the adequacy of the MND. **G-11** Comment noted. This comment does not address the adequacy of the MND. The project would result in 858 net daily trips of which 80 percent, approximately 686 daily trips, would be expected to use Robinson Avenue, with 40 percent of those trips destined to and from east of the project site and 40 percent destined to and from west of the project site.

COMMENT	RESPONSE
G-12 Please think about how these excessive building heights will affect the lifestyle of residents and the character of our Uptown neighborhoods. For example, Little Italy is no longer Little Italy, but more of a mirror of downtown San Diego - condos, restaurants and bars - no company headquarters for high quality employment. Thank you for your time and attention to my communiqué. I look forward to hearing back from you. Sincerely, Donna Shanske Bankers Hill	**G-12** Comment noted. This comment does not address the adequacy of the MND.

COMMENT	RESPONSE
## January 2018 To Whom It May Concern **H-1** The purpose of this letter is to tell you how distressed I am to learn about the probable upcoming construction of Hillcrest 111 at the corner of Robinson and Seventh. Whatever role you play in the 111 construction, I ask you not support this project. For the last 25 years I've lived in the 3600 block of Seventh, I rarely drive and take my life in my hands every time I step off the curb. To think one of my main pedestrian routes, Seventh at Robinson, already a nightmare in terms of traffic, to say nothing of drivers who are not paying attention and utterly unwilling to yield to other vehicles, much less pedestrians, is about to receive another 100 or so vehicles, entering/exiting multiple times daily, how can this be? **H-2** At a community meeting some months back, a developer person (maybe a builder, maybe a real estate person …) actually said with a straight face that traffic on Robinson and Seventh won't suffer because access to the building is from the alley. Has anyone actually charted what goes on in that alley, what kind of traffic tries to move along Robinson, or what kind of traffic also tries to move along Pennsylvania? All those areas are already clogged with cars. Robinson and Pennsylvania are both narrow, and the alley even narrower. **H-3** Then there's the height issue on those two narrow two-lane streets, especially. There will be little direct sunlight, ricocheting noise, far-flung shadows and no greenery. I imagine it'll be a wind tunnel too. What happened to height limits? **H-4** Lastly, there's the neighborhood character. In no way, shape or form do I support tall buildings in Hillcrest. Del Prado, Coral Tree Plaza and the PacBell buildings all got in before anyone was really paying attention; that is no reason to allow anything even remotely similar to be built here. Atlas is challenging enough to the neighborhood character. Thank you for your consideration. Jim Black	**H-1** Comment noted. This comment provides introductory statements and does not address the adequacy of the MND. **H-2** The project includes a number of pedestrian improvements along 7th Avenue and Robinson Avenue. Currently, the sidewalks along Robinson Avenue are mostly non-contiguous, with a dirt strip and street trees separating the sidewalk from the roadway and mostly contiguous along 7th Avenue, with no buffer from the roadway. Between the sidewalk and project site is sparse shrubbery and a chain-link fence on Robinson Avenue, as well as driveway cuts for the existing surface parking lot. The project proposes pedestrian-level streetscape improvements, including a 12.5-foot wide noncontiguous sidewalk and landscaped parkway which includes shade trees to provide visual and physical buffer between the sidewalk and the street, and pedestrian-level details (such as ground floor entry for both residential and retail uses, expansive storefront windows, and varying materials and finishes) to improve the pedestrian environment along the project frontage. As stated in the MND, the project would generate 858 ADT, with 59 AM peak hour trips (14 inbound and 45 outbound) and 78 PM peak hour trips (51 inbound and 27 outbound. The amount of project traffic expected on the alley is shown in Figure 3 (Appendix I to the MND). The TRANSPORTATION/TRAFFIC mitigation measure, which includes restriping the impacted segment of Robinson Avenue, providing a separate left turn lane at the eastbound and westbound approaches at Robinson Avenue and 7th Avenue, and the associated traffic signal modifications, would reduce potential impacts to below a level of significance. **H-3** The proposed project is located on a block with lower intensity development in the form of one- and two-story single-family and multi-family residential buildings. The proposed mixed-use building is located on the northern half of the project site and would result in minimal blockage of sunlight. Please also refer

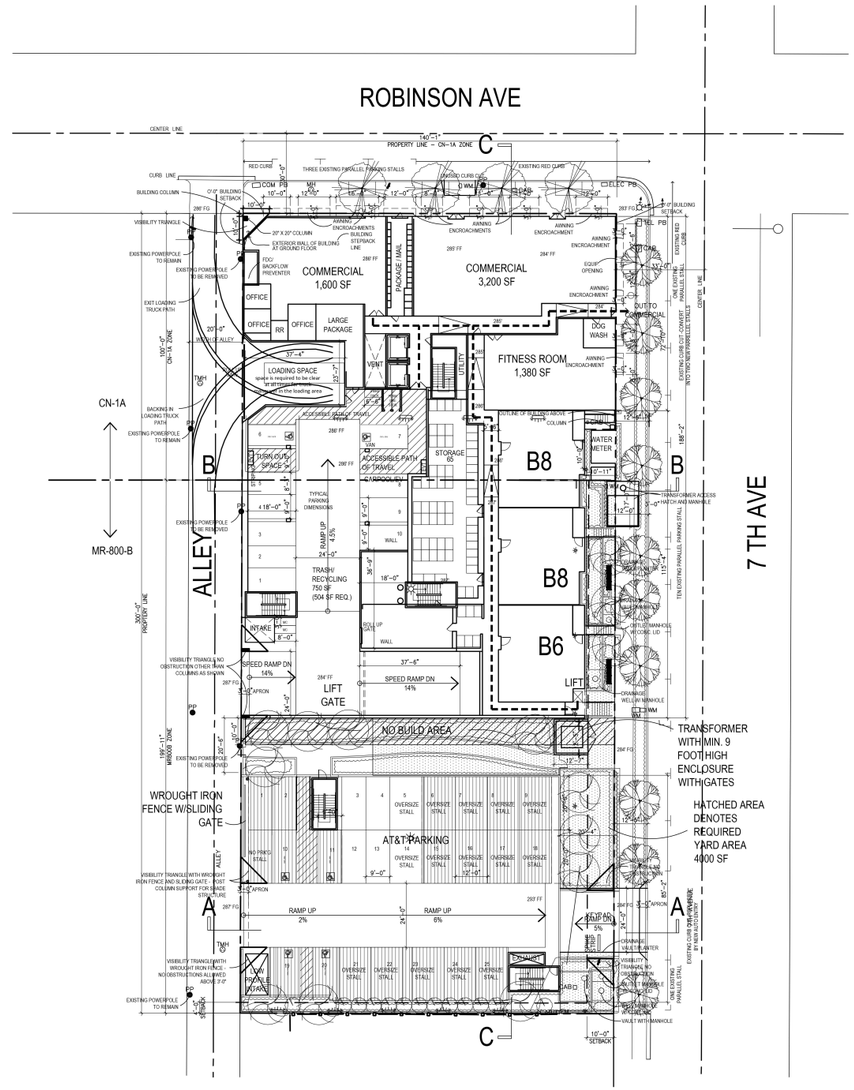
COMMENT	RESPONSE
	to all of the responses to Comment Letter B. They include an extensive discussion addressing project shadow creation. Additionally, because the project building is located in an area of lower development intensity, there are no other buildings with which sound could ricochet or a wind tunnel could form. Both of these effects would require additional buildings of comparable size to line a street on both sides, in additional to other acoustical and atmospheric elements that would also need to be present. A detailed landscape plan and planting palette have been designed for the proposed project and will be included as Exhibit A for the development permit. As noted, the proposed project includes a wide sidewalk with landscaped parkway, as well as an extensive landscaping palette, summarized in Section I.c, Aesthetics, of the MND. The streetscape scheme is characterized by large, evergreen, canopy-form trees adjacent to the curbs along Robinson Avenue and 7th Avenue. Street trees are provided at a rate of one tree for every 30-feet of linear street frontage, as required by the Landscape Regulations. Planted at 36-inch box size (which is larger than the required 24-inch box size), species include Acacia pendula or fruitless Olea europea along Robinson Avenue and Jacaranda mimosifolia along 7th Avenue as per the Street Tree Plan of the Uptown Community Plan. Trees on Robinson Avenue can reach a mature height/spread of 25-feet to 35-feet, while those on 7th Avenue can reach a height/spread of 35-feet to 50-feet. In addition to the street trees, a parkway planting strip with drought-tolerant groundcovers would run the entire length of the 7th Avenue street frontage, creating a non-contiguous sidewalk and further improving the streetscape scene. Where proposed residential uses front 7th Avenue, the landscape enhances the pedestrian experience, visually softens the building mass from the right-of-way, and provides a buffer for residents at the lower levels. Evergreen accent trees are proposed on the private property, providing additional canopy

COMMENT	RESPONSE
	coverage over the sidewalk. Tiered planters are designed with a selection of flowering and evergreen shrubs, which provide a visual transition for the grade change from sidewalk to unit entry. Additionally, a podium level deck directly above the street-level units, opens up to face 7th Avenue. Tall palm specimens and accent canopy trees planted at the podium level will be visible from the public right-of-way, further softening views of the tower façade. Landscaping exceeds the minimum street yard area and points required by the Land Development Code for commercial and residential development. Consistent with the Land Development Code, the proposed project is processing an incentive to allow for the building to exceed allowable height limits of the Mid-City PDO. This incentive is to deviate from the building height standard, with a maximum building height of 84 feet in the CN-1-A zone, where 65 feet is allowed, and 76 feet in the MR-800B zone, where 60 feet is allowed. **H-4** Comment noted. This comment does not address the adequacy of the MND.

COMMENT	RESPONSE
From: Deirdre Lee [mailto:deirdresjungle@cox.net] **Sent:** Saturday, January 27, 2018 7:50 PM **To:** DSD EAS <DSDEAS@sandiego.gov> **Subject:** Project Name: Hillcrest 111. Project No. 52207. MND January 25, 2018 Anna L. McPherson Senior Environmental Planner City of San Diego, Development Services Center	
I-1 I am very concerned about this project for many reasons, height—too tall!, setbacks —too minimal, character— in a historic and eclectic neighborhood, but most importantly, SAFETY!	**I-1** Comment noted. This comment provides introductory statements and does not address the adequacy of the MND.
I-2 As a cyclist I am well aware that Robinson is the best but still a lousy route east to the other half of Hillcrest and to North Park and beyond. It is already way over capacity, very narrow, with a freeway on-ramp two blocks away.	**I-2** Comment noted. This comment does not address the adequacy of the MND.
I-3 Do we really want dozens of cars continually entering and exiting this development off of the ALLEY between 6th and 7th?? There is no way to widen it, the auto garage also uses it, and we NEED that service and that "old gas station." And yes, there will be cars.	**I-3** As discussed in Section XVI, Transportation/Traffic, the project would generate 858 net daily trips and would result in a significant impact to the segment of Robinson Avenue from 6th Avenue to 7th Avenue. The Transportation/Traffic mitigation measure, which includes restriping the impacted segment of Robinson Avenue, providing a separate left turn lane at the eastbound and westbound approaches at Robinson Avenue and 7th Avenue, and the associated traffic signal modifications, would reduce potential impacts to below a level of significance.
I-4 After so much public comment about the situation for pedestrians and cyclists, if the city approves this as is, I think there is a significant liability issue.	**I-4** Comment noted. This comment does not address the adequacy of the MND.
I-5 The project is over-sized for the parcel. There will be a tunnel affect there with no light on the street. This project will be pointed out as the first big mistake in the community plan.	**I-5** The project is consistent with the land use designation and the applicable design regulations of the 1988 Uptown Community Plan and the zoning requirements of the Mid-City Communities Planned District with the use of allowed incentives.
I-6 The report says "No adverse impacts are significant." This is phenomenally irresponsible. Take a real look at the project and the streets and the community and the people surrounding it and do the right thing. We don't need to stop it, we need to improve it and now is the time.	**I-6** As noted in the MND, the project would result in significant environmental effects associated with Paleontological Resources, Noise, and Transportation/Traffic. Mitigation measures would be implemented that reduce those impacts to below a level of significance.
Deirdre D Lee 244 W Brookes Ave San Diego 92103 619 299-1644	

Location Map
Hillcrest 111 / Project No. 522075
City of San Diego – Development Services Department

FIGURE No. 1



LEGEND

- PROPERTY LINE
- ACCESSIBLE PATH OF TRAVEL
- SETBACK
- NO BUILD AREA
- REQUIRED FRONT YARD AREA
- 50% SHADED PARKING AREA

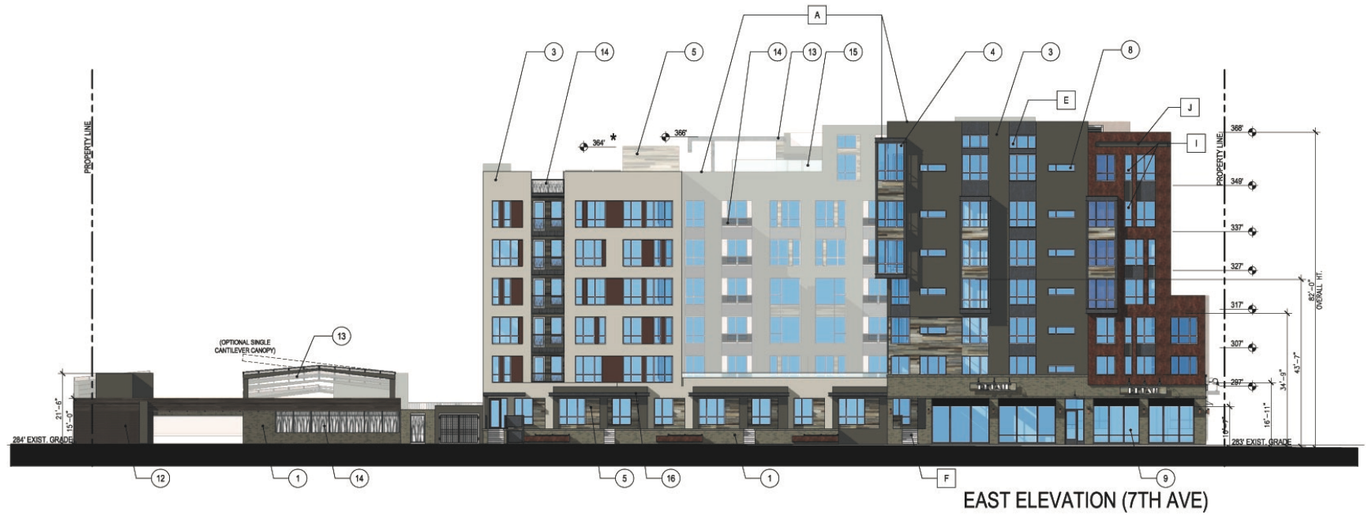
N

0' 10' 20' 40' 60'

SCALE: 1" = 20'

Site Plan
Hillcrest 111 / Project No. 522075
City of San Diego – Development Services Department

FIGURE No. 2



EAST ELEVATION (7TH AVE)

MATERIALS PALETTE*

1. BRICK VENEER
2. PORCELAIN TILE W/ FAUX CORTEN STEEL FINISH
3. EXTERIOR PLASTER
4. BAY WINDOW
5. PORCELAIN TILE W/ FAUX WOOD FINISH
6. METAL AWNING
7. FABRIC AWNING
8. VINYL WINDOWS
9. ANODIZED STOREFRONT GLAZING SYSTEM
10. HORIZONTAL METAL SLATS
11. METAL LOUVERS
12. WOOD SLATS
13. METAL SHADE STRUCTURE
14. PERFORATED METAL
15. GLASS RAILING
16. METAL CANOPY
17. METAL BLADE SIGN

ARCHITECTURAL FEATURES

- A. MULTIPLE PITCHED ROOFS
- E. A MINIMUM OF ONE TRANSOM WINDOW
- F. AN ENTRY PORCH
- I. WINDOWS RECESSED AT LEAST 2 INCHES
- J. EAVES WITH A MINIMUM 18 INCHES OVER-HANG

0' 10' 20' 40' 60'

SCALE: 1" = 20'

East Elevation
Hillcrest 111 / Project No. 522075
City of San Diego – Development Services Department

FIGURE No. 3

WEST ELEVATION (ALLEY)

MATERIALS PALETTE*

1. BRICK VENEER
2. PORCELAIN TILE W/ FAUX CORTEN STEEL FINISH
3. EXTERIOR PLASTER
4. BAY WINDOW
5. PORCELAIN TILE W/ FAUX WOOD FINISH
6. METAL AWNING
7. FABRIC AWNING
8. VINYL WINDOWS
9. ANODIZED STOREFRONT GLAZING SYSTEM
10. HORIZONTAL METAL SLATS
11. METAL LOUVERS
12. WOOD SLATS
13. METAL SHADE STRUCTURE
14. PERFORATED METAL
15. GLASS RAILING
16. METAL CANOPY
17. METAL BLADE SIGN
18. METAL FENCH

ARCHITECTURAL FEATURES

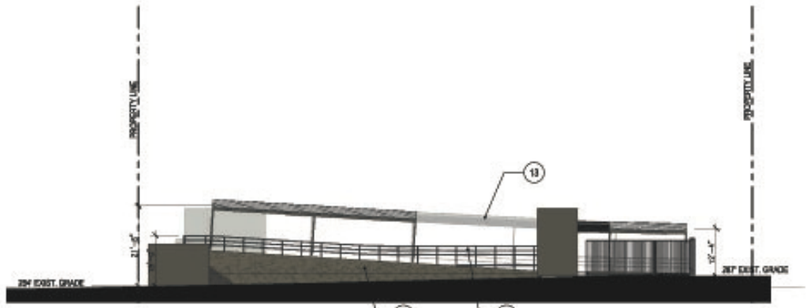
- A. MULTIPLE PITCHED ROOFS
- E. A MINIMUM OF ONE TRANSOM WINDOW
- F. AN ENTRY PORCH
- I. WINDOWS RECESSED AT LEAST 2 INCHES
- J. EAVES WITH A MINIMUM 18 INCHES OVER-HANG

0' 10' 20' 40' 60'

SCALE: 1" = 20'

West Elevation
Hillcrest 111 / Project No. 522075
City of San Diego – Development Services Department

FIGURE No. 4



NORTH ELEVATION (AT&T GARAGE)

NORTH ELEVATION (ROBINSON AVE)

MATERIALS PALETTE*

1. BRICK VENEER
2. PORCELAIN TILE W/ FAUX CORTEN STEEL FINISH
3. EXTERIOR PLASTER
4. BAY WINDOW
5. PORCELAIN TILE W/ FAUX WOOD FINISH
6. METAL AWNING
7. FABRIC AWNING
8. VINYL WINDOWS
9. ANODIZED STOREFRONT GLAZING SYSTEM
10. HORIZONTAL METAL SLATS
11. METAL LOUVERS
12. WOOD SLATS
13. METAL SHADE STRUCTURE
14. PERFORATED METAL
15. GLASS RAILING
16. METAL CANOPY
17. METAL BLADE SIGN

ARCHITECTURAL FEATURES

- A. MULTIPLE PITCHED ROOFS
- E. A MINIMUM OF ONE TRANSOM WINDOW
- F. AN ENTRY PORCH
- I. WINDOWS RECESSED AT LEAST 2 INCHES
- J. EAVES WITH A MINIMUM 18 INCHES OVER-HANG

0' 10' 20' 40' 60'

SCALE: 1" = 20'

North Elevation
Hillcrest 111 / Project No. 522075
City of San Diego – Development Services Department

FIGURE No. 5

SOUTH ELEVATION (AT&T GARADE)

SOUTH ELEVATION

MATERIALS PALETTE*

1. BRICK VENEER
2. PORCELAIN TILE W/ FAUX CORTEN STEEL FINISH
3. EXTERIOR PLASTER
4. BAY WINDOW
5. PORCELAIN TILE W/ FAUX WOOD FINISH
6. METAL AWNING
7. FABRIC AWNING
8. VINYL WINDOWS
9. ANODIZED STOREFRONT GLAZING SYSTEM
10. HORIZONTAL METAL SLATS
11. METAL LOUVERS
12. WOOD SLATS
13. METAL SHADE STRUCTURE
14. PERFORATED METAL
15. GLASS RAILING
16. METAL CANOPY
17. METAL BLADE SIGN
18. METAL FENCH

ARCHITECTURAL FEATURES

- A. MULTIPLE PITCHED ROOFS
- E. A MINIMUM OF ONE TRANSOM WINDOW
- F. AN ENTRY PORCH
- I. WINDOWS RECESSED AT LEAST 2 INCHES
- J. EAVES WITH A MINIMUM 18 INCHES OVER-HANG

0' 10' 20' 40' 60'

SCALE: 1" = 20'

South Elevation
Hillcrest 111 / Project No. 522075
City of San Diego – Development Services Department

FIGURE No. 6

INITIAL STUDY CHECKLIST

1. Project title/Project number: Hillcrest 111 / 522075

2. Lead agency name and address: City of San Diego, 1222 First Avenue, MS-501, San Diego, California 92101

3. Contact person and phone number: Rhonda Benally/ (619) 446-5468

4. Project location: 635 Robinson Avenue, San Diego, California 92103

5. Project Applicant/Sponsor's name and address: Greystar
   17885 Van Karman Avenue, Suite 450
   Irvine, California 92614

6. General/Community Plan designation: Multiple Use / Residential-High Density and Mixed-Use Commercial[1]

7. Zoning: MR-800B (Residential-High Density) and
   CN-1A (Commercial Node- Mixed Use- Very High Density)[1]

8. Description of project (Describe the whole action involved, including but not limited to, later phases of the project, and any secondary, support, or off-site features necessary for its implementation.):

   The proposal involves a **Neighborhood Development Permit (NDP)** to request two incentives to deviate from height and setback requirements to build 111 multi-family units (102 market rate units and nine affordable units), 4,800 square feet of commercial space, and 190 parking spaces. The ~~136,213~~136,816-square-foot, seven-story mixed-use building with three levels of underground parking and a detached subterranean parking structure is proposed on a 42,000-square-foot site located at 635 Robinson Avenue (APN 452-103-61-00) in the Uptown Community Plan area. The proposed detached subterranean parking structure would provide the required parking to serve employees working at the AT&T building, located off-site and immediately north of the project site, in compliance with CUP No. 11086.

   The first incentive is to deviate from the building height standard. The proposed building height is 84 feet. Per former Municipal Code Section 1512.0205(a)(1), a 65-foot maximum height is permitted in Area B (north of Upas Street, in which the project site falls) and 60 feet in the MR-800B zone (Table 1512-03F). The requested incentive would allow the project to exceed the height standard to allow an 84-foot-tall building in the CN-1A zone, and a 76-foot-tall building in the MR-800B zone. The average height of the proposed detached subterranean parking structure is 15 feet above grade and would include a 21.5-foot eight-inch tower.

[1] The project was deemed complete on November 14, 2016, prior to the approval and adoption of the Uptown Community Plan Update. As such, the project will be processed in accordance with the 1988 Uptown Community Plan, and the Mid-City Planned District Ordinance, in place at that time.

Incentive 1				
Building Height	**Required**	**Proposed**	**Zone**	**Code Section**
Maximum Structure Height	65 ft	84 ft	CN-1-A	1512.0205
Maximum Structure Height	60 ft	76 ft	MR-800B	Table 1512-03F

The second incentive is for setbacks. Per former Municipal Code Section 1512.0303(d)(4)(E), an eight-foot rear setback is required for each story above the second story. Per former Municipal Code Section 1512.0303(d)(4)(B), a side setback of nine feet is required for each story above the second story. Per former Municipal Code Table 152-03E, a zero-foot rear setback (alley) is required. Further, per former Municipal Code Section 1512.0308(b)(8)(b) (CN-1-A), the street wall shall not exceed 36 feet in height with additional height of the structure step back at least 15 feet from the base of the wall. Along 7th Avenue and Robinson Avenue, the project does not comply, requiring approval of the incentives. The rear, side, and street wall setbacks are considered one incentive, due to the split zoning across site. The setback incentive is necessary to maintain the height of the structure at the context-sensitive height currently proposed.

Incentive 2				
Step Backs	**Required**	**Proposed**	**Zone**	**Code Section**
Rear Yard Setback (alley)	1 ft	0 ft	MR-800B	Table 1512-03E
Rear Yard Upper Floor Step Back, 3rd floor and above (alley)	8 ft	0 ft	MR-800B	1512.0303(d)(4)(E)
Side Yard Upper Floor Step Back, 3rd floor and above (south elevation)	9 ft	0 ft	MR-800B	1512.0303(d)(4)(B)
Street Wall Step Back for portion of structure over 36 ft tall (Robinson)	15 ft	0 ft on floors 2-3 10' on floors 4-7	CN-1-A	1512.0309(b)(7)(B)

The project is located at 635 Robinson Avenue in the southwest quadrant of the intersection of Robinson Avenue and 7th Avenue. The project site is approximately one acre in size and is currently developed as a surface parking lot for an AT&T facility located at 650 Robinson Avenue. The existing surface parking lot functions under an approved Conditional Use Permit (CUP No. 11086), approved in 1972, and a shared parking agreement between AT&T and the owner of the property at 635 Robinson Avenue. CUP No. 11086 allows the MR-800B-zoned portion of the project site to serve as an 86-space parking lot for the AT&T facility. The project includes the demolition of the existing surface parking and redevelopment of the site as a mixed-use project with commercial retail and residential uses and a new subterranean parking structure to provide 86 parking spaces for the AT&T facility.

Development of the project would involve the construction of a seven-story, 136,816~~136,213~~-square-foot mixed-use structure, which would include residential units and commercial retail space. The project would develop 111 residential dwelling units, including 102 market rate units and nine affordable units restricted to very-low income households. Additionally, 4,800 square feet of commercial retail space, which cannot be used for eating/drinking establishment(s), would be provided on the ground floor of the building. The mixed-use building is required to provide a minimum 79 residential parking spaces and a minimum ten commercial parking spaces. A total of 190 parking spaces would be provided for the mixed-use project on the ground level for commercial use and in a subterranean parking structure for residential use with access via an alley along the project site's western border (see Figure 3-Site Plan). This parking structure would serve the mixed-use project, including the residential and commercial components, and would include the required six accessible vehicle parking spaces, bicycle parking spaces, and electric vehicle charging spaces.

The mixed-use component of the proposed project would have a maximum building height of 84 feet for the northern section of the mixed-use building and 76 feet for the southern portion of the mixed-use building. Five and six levels of residential housing would be located above ground floor commercial and residential units. Parking would be accommodated in three levels of subterranean parking. Architectural features at the ground floor pedestrian level would include entry porches for residential units, brick veneer, metal and fabric awnings, metal canopies, porcelain tile with faux wood finish, anodized storefront glazing, and perforated metal accents. Architectural features of the building would include multiple pitched roofs, a

minimum of one transom window on the top floor, windows recessed at least two inches, and eaves with a minimum overhang of 18 inches. Materials for the building include porcelain tile with faux corten steel and faux wood finish; plaster; bay windows; vinyl windows; metal elements, including horizontal metal slats, metal louvers, metal shade structures, and perforated metal accents; and glass railings.

Project landscaping includes a variety of trees, shrubs, vines, and ground cover. The tree schedule includes accent palms and small canopy form trees on the second level podium deck (such as kentia palm (Howeaforsteriana) or queen palm (Syagrus romanzoffiana), 25 to 50 feet at mature height), street trees along Robinson Avenue (such as weeping acacia or fruitless olive, 25 to 35 feet at mature height), street trees along 7th Avenue (such as jacaranda, 35 to 50 feet at mature height), accent trees (such as aloe, crepe myrtle, and/or sweet bay, 15 to 25 feet at mature height), and evergreen accent trees (such as silk floss tree, purple-leaf plum, or pink trumpet tree, 15 to 30 feet at mature height). Shrubbery would include columnar screening shrubs (such as tawhiwhi or shrubby yew), as well as other shrubs, such as agave, bamboo, jasmine, and/or lily. Vines, such as Boston ivy, jasmine, and violet trumpet vine, and low groundcovers (24 inches or lower), such as carpet rosemary and/or blue chalk sticks, round out the planting schedule.

The proposed project includes several resident amenities. A 1,380-square-foot fitness center would be located on the ground floor. On the second level, a podium deck would be provided with 1,770 square feet of lounge space. The podium deck would include features such as a wall fountain, fire pit, outdoor lounge furniture, outdoor pool table, gas barbeques, bar top with TVs, overhead shade structure, and decorative landscaping. On the seventh floor, a roof deck would be provided. Features of the roof deck would include gas barbeques, bar top and TVs, overhead shade structure, decorative string lights, outdoor lounge furniture, fire pit, outdoor ping-pong table, cabanas, a spa, synthetic turf, and decorative planting.

Pedestrian access to both the commercial and residential portions of the site would be from Robinson Avenue and 7th Avenue. Accessible paths of travel are provided on all levels of the building. Vehicular access to the mixed-use building would be provided from the alley on the western boundary of the project site. Vehicular access for the separate AT&T parking structure would be provided from the alley and 7th Avenue.

The proposed project would also include a detached subterranean parking structure, which would provide the required parking to serve AT&T employees working in an adjacent facility in compliance with CUP No. 11086. The CUP requires 16.5 parking spaces for AT&T facility use, with 86 spaces provided. Parking within this structure would serve the AT&T facility and would be provided, in part, as commercial tandem parking. The separate parking structure would include an at-grade ramp with parking and three levels of subterranean parking. Maximum parking structure height would be 13 feet; the baja canopy above the parking garage would bring the total height 21 feet, six inches. Materials for the parking structure include brick veneer, wood slats, metal shade structure, and perforated metal.

Access to the parking structure would be provided via 7th Avenue and the mid-block north-south alley. Landscaping around the separate AT&T parking structure would include evergreen accent trees along all elevations, jacaranda street trees along 7th Avenue, water treatment planting along the northern elevation, shrubs along all elevations, columnar screening shrubs along the southern elevation, and vines/espaliers.

The project was deemed complete on November 14, 2016, prior to the approval and adoption of the Uptown Community Plan Update. As such, the project will be processed in accordance with the 1988 Uptown Community Plan, and the Mid-City Planned District Ordinance, in place at that time. The project site is designated as Mixed Use-Very High (73 to 110 du/ac) and Residential-High (44 to 73 du/ac) in the 1988 Uptown Community Plan, allowing for the development of a high-density multi-family residential and mixed-use commercial project. The City of San Diego's General Plan identifies the project site as Multiple Use. The General Plan's multiple use categories allow for housing in a mixed-use setting, with commercial office, retail, and civic uses. The project site is zoned MR-800B zone (which allows multi-family residential density of one dwelling unit per 800 square feet, or one dwelling unit per 600 square feet through a bonus

for parcel accumulation, which the project receives) and CN-1A zone (which allows neighborhood commercial with residential density of one dwelling units per 400 square feet) of the Mid-City Communities Planned District Ordinance.

The project would be developed with a density bonus in accordance with the City's Affordable Housing Density Bonus Regulations (San Diego Municipal Code, Chapter 14, Article 3, Division 7) and consistent with the State of California Density Bonus Law. In exchange for restricting 11 percent of the 82 units allowed by the current zoning (or nine units) as affordable housing for very-low income households, the applicant is eligible for a 35 percent density bonus, for a total of 111 units allowed on-site. In addition, the Affordable Housing Density Bonus Regulations and State of California Density Bonus Law allow the project to incorporate two development incentives, as described in Table 143-07A of the San Diego Municipal Code and processed via an NDP – Process 2. The applicant has selected height and stepback deviations as the two incentives for the proposed project. The height incentive is to exceed the height standard to allow an 84-foot-tall building in the CN-1A zone and a 76-foot-tall building in the MR-800B zone. The stepback incentive allows the project to provide a one-foot stepback along the alley in the west, a zero-foot stepback for each story above the second floor along 7th Avenue and Robinson Avenue, and a stepback of at least 15 feet from the base of the street wall. (The rear, side, and street wall stepbacks are considered one incentive, due to the fact that there are two different zones on the project site.) These incentives will allow the Density Bonus units to be constructed on-site without a Planned Development Permit (PDP) or deviations from the development regulations.

Project grading would include the excavation of 14,000 cubic yards of soil for the AT&T parking structure and 25,000 cubic yards of soil for the mixed-use portion of development. In addition to the excavation, the AT&T parking structure would require 105 cubic yards of surface grading; the mixed-use development would require 35 cubic yards of surface grading. The maximum cut depth for the mixed-use development would be 32 feet. The project would require connection to existing utilities which include water, sewer and gas, located in Robinson Avenue and 7th Avenue that front the project site. Additionally, the project would include replacement of the existing six-inch concrete pipe sewer within 7th Avenue fronting the project site with an eight-inch PVC pipe.

Discretionary actions associated with the proposed project include the approval of a Neighborhood Development Permit (NDP) Process 2 for the request to develop 111 residential dwelling units and to allow for commercial tandem parking in the AT&T parking structure. The project would be in compliance with the existing CUP (No. 11086) for AT&T employee parking, as all parking required by the existing CUP would still be available on-site. A shared parking agreement allowing the parking structure to be used for the mixed-use component of the project is being processed as part of the proposed project.

9. Surrounding land uses and setting: Briefly describe the project's surroundings:

The 42,000 square-foot site is located west of State Route 163 (SR-163) and 7th Avenue, south of Robinson Avenue, north of Pennsylvania Avenue, and east of 6th Avenue. Multi-family and single-family residential developments are located south and east of the project site. To the west and north of the project site are commercial developments including retail and restaurant uses, with the AT&T facility located immediately north of the project site. Site topography is nearly level with a ground surface elevation of approximately 286 feet.

Regional access to the site is provided via SR-163 located approximately one-quarter mile east of the project site and Interstate 5 (I-5) located approximately two miles to the west. The project site is located in the Uptown Community Plan area, Mid-City Communities Planned District. Airport Influence Area (Review Area 2), Federal Aviation Administration (FAA) Part 77 Noticing Area for the San Diego International Airport; Residential Tandem Parking Overlay Zone; and Transit Area Overlay Zone. The parcel is situated in a neighborhood setting of similar uses (commercial and residential). In addition, the project site is located in a developed area currently served by existing public services and utilities.

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

NONE REQUIRED.

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

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

In accordance with the requirements of Public Resources Code 21080.3.1, the City of San Diego engaged the Iipay Nation of Santa Isabel and the Jamul Indian Village, both traditionally and culturally affiliated with the project area. These tribes were notified via certified letter and email on June 9, 2017. Both Native American Tribes responded within the 30-day formal notification period requesting consultation. Consultation took place on July 14, 2017, with both Native American tribes, who determined that further evaluation was not necessary, and that the consultation process was concluded.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

☐	Aesthetics	☐	Greenhouse Gas Emissions	☐	Population/Housing
☐	Agriculture and Forestry Resources	☐	Hazards & Hazardous Materials	☐	Public Services
☐	Air Quality	☐	Hydrology/Water Quality	☐	Recreation
☐	Biological Resources	☐	Land Use/Planning	☒	Transportation/Traffic
☒	Cultural Resources	☐	Mineral Resources	☐	Tribal Cultural Resources
☐	Geology/Soils	☒	Noise	☐	Utilities/Service System
				☐	Mandatory Findings Significance

DETERMINATION: (To be completed by Lead Agency)

On the basis of this initial evaluation:

☐ The proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ Although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ The proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ The proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect (a) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (b) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required.

☐ Although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or (MITIGATED) NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or (MITIGATED) NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

EVALUATION OF ENVIRONMENTAL IMPACTS:

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact answer should be explained where it is based on project specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis.)

2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses", as described in (5) below, may be cross-referenced).

5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or (mitigated) negative declaration. *Section 15063(c)(3)(D).* In this case, a brief discussion should identify the following:

    a. Earlier Analysis Used. Identify and state where they are available for review.

    b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

    c. Mitigation Measures. For effects that are "Less Than Significant With Mitigation Measures Incorporated", describe the mitigation measures that were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.

9) The explanation of each issue should identify:

    a. The significance criteria or threshold, if any, used to evaluate each question; and

    b. The mitigation measure identified, if any, to reduce the impact to less than significant.

	Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
I)	AESTHETICS – Would the project:				
	a) Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

No impact. The 1988 Uptown Community Plan for the project area does not identify any scenic vistas. The project proposes a maximum development height of seven stories, located in the middle of the Hillcrest commercial core that surrounds University and 5th avenues; and public views, scenic corridors, and/or scenic vistas do not exist on the project site or in the immediate project area. The project site is not located in or immediately adjacent to a scenic vista, no impact to scenic vistas would result. The project is consistent with applicable design regulations of the 1988 Uptown Community Plan and MR-800B and CN-1A zone requirements of the Mid-City Communities Planned District, as well as policies of the City of San Diego General Plan. Construction permits would be reviewed and approved by City staff for conformance with the approved permit as part of the ministerial building permit process. No impacts would result.

b) Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒

No Impact. The project site has been graded and previously disturbed and is currently developed as a surface parking lot. Due to the previous development, there are no scenic resources (trees, rock outcroppings, or historic buildings) located on the project site. The project would not result in the physical loss, isolation, or degradation of a community identification symbol or landmark, as none are identified by the City of San Diego General Plan or Uptown Community Plan as occurring in the project vicinity. In addition, there are no scenic resources adjacent to the project site. The project site is near a State Scenic Highway, State Route 163 (SR-163), located approximately one-quarter mile to the southeast of the project site. SR-163 is not visible from the project site; the project site is not visible from SR-163, due to physical distance, topographical differences between the project site and SR-163, and dense vegetation along SR-163. Although the proposed project is in proximity to a State Scenic Highway, it would not substantially damage scenic resources along a State Scenic Highway or local roadway. No impacts would result.

c) Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	☒	☐

Less Than Significant Impact. The project site is developed as a surface parking lot. Surrounding the project are one- and two-story single- and multi-family residential buildings to the south and east with varying setbacks and massing stepbacks. The AT&T facility, located to the north of the project site, ranges from roughly one to five stories in height with no massing stepbacks and includes a clustered antenna protruding from the roof. To the west of the site are one- and two-story commercial buildings with no massing stepbacks and minimal setbacks, a gas station, and a multi-story tower structure from the middle of one of the two-story commercial buildings. The project proposes a maximum height of seven stories with numerous stepbacks along the building's height, which is within the allowable height and bulk regulations of the underlying zone and would not exceed the surrounding height and/or bulk by a substantial margin. Additionally, due to the project's location within an urbanized and built-out community, the proposed project would not have a cumulative effect by opening up a new area for development or changing the overall character of the area, such as from rural to urban or from single-family to multi-family.

The Hillcrest neighborhood is characterized by a dense urban form with open space concentrated in canyons and Balboa Park, which serves as a regional park amenity; relatively high residential density and development intensity; and diverse neighborhood design with regards to setbacks, land cover, and other development standards. An economically and demographically diverse community, Hillcrest is further identified by its pedestrian-oriented walkable circulation network that accommodates pedestrian, bicyclists, and mass transit, in addition to automobiles. The surrounding developments within the project area vary in age and quality of upkeep, creating a

varied and wide-ranging visual quality in the site surroundings. This diverse mix of land uses, building types and ages, and population create an eclectic community character.

Surrounding residential development exhibits craftsman, Spanish, a mix of 20th century-style architecture, and contemporary architecture, while the commercial components of the surrounding exhibit traditional box-like architecture with little articulation or visual interest. ~~T~~There is no single or common architectural theme that applies to the whole of the project surroundings. As such, the proposed project would not have an architectural style or use building materials in stark contrast with adjacent developments of a single or common architectural theme.

The proposed project would include a mixed-use building up to seven stories in height, with varying stepbacks along the north, east, and west elevations to provide visual interest and interrupt building massing. The project would develop a subterranean parking structure with a parking ramp at-grade to serve the AT&T facility and a separate mixed-use building which steps in height up to seven stories. Due to the flat and previously developed state of the project site, no alteration to the existing landform would result. The AT&T parking structure would provide a buffer and transition between the existing residential developments to the south and the mixed-use building of the project.

The mixed-use component of the proposed project would have a maximum building height of 84 feet for the northern section of the mixed-use building and 76 feet for the southern portion of the mixed-use building. Five and six levels of residential housing would be located above ground floor commercial and residential units. Parking would be accommodated in three levels of subterranean parking. Architectural features at the ground floor pedestrian level would include entry porches for residential units, brick veneer, metal and fabric awnings, metal canopies, porcelain tile with faux wood finish, anodized storefront glazing, and perforated metal accents. Architectural features of the building would include multiple pitched roofs, a minimum of one transom window on the top floor, windows recessed at least two inches, and eaves with a minimum overhang of 18 inches. Materials for the building include porcelain tile with faux corten steel and faux wood finish; plaster; bay windows; vinyl windows; metal elements, including horizontal metal slats, metal louvers, metal shade structures, and perforated metal accents; and glass railings.

The proposed project would also include a detached subterranean parking structure, which would provide the required parking to serve AT&T employees in compliance with CUP No. 11086. The CUP requires 16.5 parking spaces for AT&T facility use, with the remainder of the 86 spaces being supplemental parking. Parking within this structure would serve the AT&T facility and would be provided, in part, as commercial tandem parking. The separate parking structure would include an at-grade ramp with parking and three levels of subterranean parking. Maximum parking structure height would be 13 feet; the baja canopy above the parking garage would bring the total height 21 feet, six inches. Materials for the parking structure include brick veneer, wood slats, metal shade structure, and perforated metal.

Landscaping

Project landscaping includes solutions to address the unique needs of mixed-use development, which include: a pedestrian-friendly streetscape along commercial uses, verdurous landscaping in tiered planters along residential use frontages, and evergreen screening for the adjacent parking structure.

The streetscape scheme is characterized by large, evergreen, canopy-form trees adjacent to the curbs along Robinson and 7th Avenues. Street trees are provided at a rate of one tree for every 30-feet of linear street frontage, as required by the Landscape Regulations. Planted at 36-inch box size (which is an upgrade above the required 24-inch box size), species include Acacia pendula or fruitless Olea europea along Robinson Avenue and Jacaranda mimosifolia along 7th Avenue as per the Street Tree Plan of the Uptown Community Plan. Trees on Robinson Avenue can reach a mature height/spread of 25-feet to 35-feet, while those on 7th Avenue can reach a height/spread of 35-feet to 50-feet. In addition to the street trees, a parkway planting strip with drought-tolerant

groundcovers would run the entire length of the 7th Avenue street frontage, creating a non-contiguous sidewalk and further improving the streetscape scene.

Where residential uses front 7th Avenue, the landscape enhances the pedestrian experience, visually softens the building mass from the right-of-way, and provides a buffer for residents at the lower levels. Evergreen accent trees are proposed on the private property, providing additional canopy coverage over the sidewalk. Tiered planters are designed with a selection of flowering and evergreen shrubs, which provide a visual transition for the grade change from sidewalk to unit entry. Additionally, a podium level deck directly above the street-level units, opens up to face 7th Avenue. Tall palm specimens and accent canopy trees planted at the podium level will be visible from the public right-of-way, further softening views of the tower façade.

The adjacent proposed parking structure at the south portion of the development is mostly subterranean. Therefore, the profile of the structure along 7th Avenue, consisting of the main façade and rooftop shade canopies, rises approximately 21 feet six inches above grade. The structure is set back 20 feet from the right-of-way, creating a large planting area for vegetated screening which would feature a palette of densely foliated evergreen shrubs and flowering accent trees that can grow to a mature height and spread of 15-feet to 30-feet. Moreover, a required landscaped buffer is provided along the south property line adjacent to a residentially zoned development. This area would be planted with a combination of columnar screening shrubs such as Pittosporum tenuifolium or Podocarpus macrophyllus maki and evergreen accent trees. Where the three evergreen accent trees are provided as shown in Figure 3, the structure will be setback a minimum of five feet. The resulting visual impact into the project from the adjacent parcel to the south would not be greater than the existing perimeter wall. The site landscaping creates more green spaces over existing conditions and enhances views from the public right-of-way along Robinson Avenue, 7th Avenue, and the alley.

As described, the project would integrate an extensive landscape palette, and the mixed-use building would include recesses and entries on the ground plane and would be constructed with high quality materials and architectural elements. As such, the project would not substantially degrade the visual character and quality of the site or the surrounding area. Impacts would be less than significant.

d) Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

Less Than Significant Impact. The project site is currently fully developed as a surface parking lot for AT&T employees. The project site is a source of light in the form of perimeter lighting. The project area is a mixed-use neighborhood that already has several lighting sources, such as streetlights. Other sources of light in the area include light from homes and multi-family housing developments, lighting for the commercial elements, parking lighting, and security lighting.

Landscaping and architectural features associated with the proposed project may be illuminated. Additional lighting may be provided in pedestrian and parking areas to provide security.

The project would not create a new source of substantial light that would adversely affect daytime or nighttime views in the area. Lighting would be regulated by compliance with Section 142.0740 of the City of San Diego Land Development Code. Glare would be avoided in accordance with Section 142.0730 of the City of San Diego Land Development Code. No more than 50 percent of any single elevation of the mixed-use building's exterior would be built with a material with a light reflectivity greater than 30 percent. Additionally, the project would not shed substantial light onto adjacent, light-sensitive property or emit a substantial amount of ambient light into the nighttime sky. With the exception of lighting safety lighting within pedestrian circulation areas and illuminated signage, all project lighting would be internal to the building in the form of residential and commercial use lighting

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

and this lighting would not be shed onto surrounding developments. Furthermore, as described above, lighting already occurs in the project area due to streetlights, security lighting in the existing parking lot, and surrounding residential and commercial development. Adherence to the Land Development Code ensures that project impacts relative to lighting and glare would be less than significant.

Additionally, the project would not substantially block light or create significant shade impacts. The project would be stepped back along the southern elevation and would be separated from existing residential developments by the parking structure footprint. The project would not exceed 84 feet in height and would not cast shadows or shading that would extend substantially beyond the property boundary for extended periods of time. As such, shading would be minimal, and light would be able to pass through the project site.

II. AGRICULTURAL AND FOREST RESOURCES: In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. – Would the project:

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

No Impact. The project site does not contain prime farmland, unique farmland, or farmland of Statewide Importance as designated by the California Department of Conservation. Agricultural land is not present on the site or in the general vicinity. No impact would result.

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

No Impact. Refer to II.a., above. There are no Williamson Act Contract Lands on or within the vicinity of the site. Furthermore, the project would not affect any properties zoned for agricultural use or affected by a Williamson Act Contract, as there are none within the project vicinity. Agricultural land is not present on the site or in the general vicinity of the site; therefore, no conflict with the Williamson Act Contract would result. No impact would result.

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

No Impact. The project would not conflict with existing zoning for or cause a rezoning of forest land, timberland, or timberland zoned Timberland Production. No designated forest land or timberland occur on-site. No impact would result.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒

No Impact. Refer to II.c., above. Furthermore, the project would not contribute to the conversion of any forested land to non-forest use, as surrounding land uses are built out. No impact would result.

e) Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

No Impact. Refer to II.a. through d., above. No impact would result.

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

a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	☒

Scientific Resources Associated (SRA) completed an Air Quality Analysis for the proposed project (September 1, 2017) to determine the potential for project impacts during construction and operation. The Air Quality Analysis is included in Appendix J to the MND.

No Impact. The project site is located in the San Diego Air Basin (SDAB) and is under the jurisdiction of the San Diego Air Pollution Control District (SDAPCD) and the California Air Resources Board (CARB). Both the State of California and the Federal government have established health-based Ambient Air Quality Standards (AAQS) for the following six criteria pollutants: carbon monoxide (CO); ozone (O3); nitrogen oxides (NOx); sulfur oxides (SOx); particulate matter up to 10 microns in diameter (PM10); and lead (Pb). O_3 (smog) is formed by a photochemical reaction between NOx and reactive organic compounds (ROCs). Thus, impacts from O_3 are assessed by evaluating impacts from NOx and ROCs. A new increase in pollutant emissions determines the impact on regional air quality as a result of a proposed project. The results also allow the local government to determine whether a proposed project would deter the region from achieving the goal of reducing pollutants in accordance with the Air Quality Management Plan (AQMP) in order to comply with Federal and State AAQS.

The SDAPCD and San Diego Association of Governments (SANDAG) are responsible for developing and implementing the clean air plan for attainment and maintenance of the ambient air quality standards in the SDAB. The County Regional Air Quality Strategy (RAQS) was initially adopted in 1991, and is updated on a triennial basis (most recently in 2009). The RAQS outlines the SDAPCD's plans and control measures designed to attain the state air quality standards for ozone (O_3). The RAQS relies on information from the CARB and SANDAG, including mobile and area source emissions, as well as information regarding projected growth in San Diego County and the cities in the county, to project future emissions and then determine the strategies necessary for the reduction of emissions through regulatory controls. CARB mobile source emission projections and SANDAG growth projections are based on population, vehicle trends, and land use plans developed by San Diego County and the cities in the county as part of the development of their general plans.

The RAQS relies on SANDAG growth projections based on population, vehicle trends, and land use plans developed by the cities and by the county as part of the development of their general plans. As such, projects that propose

development that is consistent with the growth anticipated by local plans would be consistent with the RAQS. However, if a project proposes development that is greater than that anticipated in the local plan and SANDAG's growth projections, the project might be in conflict with the RAQS and may contribute to a potentially significant cumulative impact on air quality.

The proposed project would construct 111 residential dwelling units, including 102 market rate units and nine affordable units restricted to very-low income households, and 4,800 square feet of commercial retail space within a developed mix-use neighborhood. The project is consistent with the General Plan, Community Plan, and the underlying zone. Therefore, the project would be consistent at a sub-regional level with the underlying growth forecasts in the RAQS and would not obstruct implementation of the RAQS. No impacts would result.

b)	Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☐	☒	☐

Less Than Significant Impact.

Short-Term (Construction) Emissions

SRA evaluated potential impacts to air quality from the construction phase of the project using the CalEEMod Model, Version 2016.3.1, which is the latest version of the California air quality model for land use projects. Project construction activities could potentially generate combustion emissions from on-site heavy-duty construction vehicles and motor vehicles transporting the construction crew and necessary construction materials. Exhaust emissions generated by construction activities would generally result from the use of typical construction equipment that may include excavation equipment, forklift, skip loader, and/or dump truck. Variables that factor into the total construction emissions potentially generated include the level of activity, length of construction period, number of pieces and types of equipment in use, site characteristics, weather conditions, number of construction personnel, and the amount of materials to be transported on- or off-site. It is anticipated that construction equipment would be used on-site for four to eight hours per day; however, construction would be short-term (approximately 26 months, including demolition), and impacts to neighboring uses would be minimal and temporary. SRA analysis of emissions from construction, shown in Table 1, *Estimated Maximum Daily Construction Emissions***,** demonstrates that construction emissions would be below the San Diego Air Pollution Control District Pollutant Thresholds for Stationary Sources, as shown in Table A-2 of the City of San Diego California Environmental Quality Act Significance Determination Thresholds (July 2016) for air quality. Therefore, construction would result in a less than significant impact on air quality.

Table 1 - Estimated Maximum Daily Construction Emissions

Emission Source	ROG	NOx	CO	SO_2	PM_{10}	$PM_{2.5}$
Phase 1 – Parking Structure Construction						
Demolition						
Fugitive Dust	-	-	-	-	0.31	0.05
Offroad Equipment	1.06	9.43	7.78	0.01	0.62	0.59
Onroad Emissions	0.03	1.15	0.24	0.003	0.07	0.02
Worker Trips	0.04	0.03	0.34	0.001	0.08	0.02
Subtotal	**1.13**	**10.61**	**8.36**	**0.01**	**1.08**	**0.68**
Significance Criteria	137	250	550	250	100	55
Significant?	*No*	*No*	*No*	*No*	*No*	*No*
Grading						
Fugitive Dust	-	-	-	-	0.31	0.16
Offroad Equipment	1.35	12.54	11.07	0.02	0.77	0.73
Onroad Emissions	0.24	8.43	1.74	0.02	0.50	0.16
Worker Trips	0.05	0.04	0.45	0.001	0.11	0.03
Subtotal	**1.64**	**21.01**	**13.26**	**0.04**	**1.69**	**1.08**

Issue	Potentially Significant Impact		Less Than Significant with Mitigation Incorporated		Less Than Significant Impact	No Impact
Significance Criteria	137	250	550	250	100	55
Significant?	*No*	*No*	*No*	*No*	*No*	*No*
Building Construction						
Offroad Equipment	1.08	11.03	7.75	0.01	0.71	0.65
Vendor Trips	0.04	0.92	0.24	0.002	0.05	0.02
Worker Trips	0.07	0.05	0.58	0.002	0.14	0.04
Subtotal	**1.19**	**12.00**	**8.57**	**0.01**	**0.90**	**0.71**
Significance Criteria	137	250	550	250	100	55
Significant?	*No*	*No*	*No*	*No*	*No*	*No*
Paving						
Offroad Equipment	0.92	8.74	7.22	0.01	0.51	0.47
Worker Trips	0.08	0.06	0.62	0.002	0.15	0.04
Subtotal	**1.00**	**8.80**	**7.84**	**0.01**	**0.66**	**0.51**
Significance Criteria	137	250	550	250	100	55
Significant?	*No*	*No*	*No*	*No*	*No*	*No*
Architectural Coatings Application						
Architectural Coatings	1.36	-	-	-	-	-
Offroad Equipment	0.30	2.01	1.85	0.003	0.15	0.15
Worker Trips	0.01	0.01	0.10	0.00	0.02	0.01
Subtotal	**1.67**	**2.02**	**1.95**	**0.00**	**0.17**	**0.16**
Significance Criteria	137	250	550	250	100	55
Significant?	*No*	*No*	*No*	*No*	*No*	*No*
Maximum Daily Emissions, Phase 1[a]	**3.87**	**22.82**	**18.37**	**0.04**	**1.74**	**1.38**
Significance Criteria	137	250	550	250	100	55
Significant?	*No*	*No*	*No*	*No*	*No*	*No*
Phase 2 – Mixed-Use Building Construction						
Grading						
Fugitive Dust	-	-	-	-	2.39	1.30
Offroad Equipment	2.58	28.35	16.29	0.03	1.40	1.29
Onroad Emissions	0.63	21.83	4.71	0.06	1.35	0.43
Worker Trips	0.06	0.04	0.46	0.001	0.12	0.03
Subtotal	**3.27**	**50.22**	**21.46**	**0.09**	**5.26**	**3.05**
Significance Criteria	137	250	550	250	100	55
Significant?	*No*	*No*	*No*	*No*	*No*	*No*
Building Construction						
Offroad Equipment	2.36	21.08	17.16	0.03	1.29	1.21
Vendor Trips	0.12	3.22	0.83	0.01	0.20	0.07
Worker Trips	0.45	0.32	3.56	0.01	0.95	0.26
Subtotal	**2.93**	**24.62**	**21.55**	**0.05**	**2.44**	**1.54**
Significance Criteria	137	250	550	250	100	55
Significant?	*No*	*No*	*No*	*No*	*No*	*No*
Paving						
Offroad Equipment	1.27	12.76	12.31	0.02	0.72	0.66
Worker Trips	0.08	0.05	0.62	0.002	0.17	0.04
Subtotal	**1.35**	**12.81**	**12.93**	**0.02**	**0.89**	**0.70**
Significance Criteria	137	250	550	250	100	55
Significant?	*No*	*No*	*No*	*No*	*No*	*No*
Architectural Coatings Application						
Architectural Coatings	8.87	-	-	-	-	-
Offroad Equipment	0.27	1.84	1.84	0.003	0.13	0.13
Worker Trips	0.09	0.06	0.71	0.002	0.19	0.05
Subtotal	**9.23**	**1.90**	**2.55**	**0.01**	**0.32**	**0.18**
Significance Criteria	137	250	550	250	100	55
Significant?	*No*	*No*	*No*	*No*	*No*	*No*
Maximum Daily Emissions, Phase 2[a]	**13.51**	**50.22**	**37.04**	**0.09**	**5.26**	**3.04**
Significance Criteria	137	250	550	250	100	55
Significant?	*No*	*No*	*No*	*No*	*No*	*No*

Demolition, excavation, and grading can cause fugitive dust emissions. Construction of the project would be subject to standard measures required by a City of San Diego grading permit to reduce potential air quality impacts to less than significant. These measures include, but are not limited to, compliance with SDMC 142.0710, which prohibits airborne contaminants from emanating beyond the boundaries of the premises upon which the use emitting the contaminants is located. Some example measures are watering three times daily, reducing vehicle speeds to 15 miles per hour on unpaved or use architectural coatings that comply with San Diego Air Pollution Control District Rule 67.0 [i.e., architectural coatings that meet a volatile organic compounds (VOC) content of 100 grams per liter (g/l) for interior painting and 150 g/l for exterior painting] would be used during construction. Therefore, impacts associated with fugitive dust are considered less than significant and would not violate an air quality standard or contribute substantially to an existing or projected air quality violation.

Long-Term (Operational) Emissions

SRA evaluated potential impacts to air quality from the operational phase of the project using the CalEEMod Model, Version 2016.3.1, which is the latest version of the California air quality model for land use projects. Operational emissions were based on CalEEMod default assumptions, which provide a conservative means of estimating emissions. Long-term air emission impacts are those associated with stationary sources and mobile sources related to any change caused by a project. After construction, air emissions from the project could result from heating, ventilation, and cooling (HVAC) systems typically associated with mixed-use development uses. The proposed project is compatible with the surrounding commercial/residential development and is permitted by the community plan and zoning designation. SRA analysis of emissions from operation, shown in Table 2, *Operational Emissions***,** demonstrates that project emissions over the long-term are not anticipated to violate any air quality standard or contribute substantially to an existing or projected air quality violation. Therefore, operations of the project would result in a less than significant impact on air quality.

Table 2 - Operational Emissions

	ROG	NOx	CO	SO_x	PM_{10}	$PM_{2.5}$
Maximum Daily Emissions						
Summer Day, Lbs/day						
Area Sources	3.12	0.11	9.20	0.00	0.05	0.05
Energy Use	0.03	0.26	0.12	0.002	0.02	0.02
Vehicular Emissions	1.26	4.68	11.66	0.04	2.95	0.81
TOTAL	**4.41**	**5.05**	**20.97**	**0.04**	**3.03**	**0.88**
Significance Criteria	137	250	550	250	100	55
Significant?	*No*	*No*	*No*	*No*	*No*	*No*
Winter Day, Lbs/day						
Area Sources	3.12	0.11	9.20	0.00	0.05	0.05
Energy Use	0.03	0.26	0.12	0.002	0.02	0.02
Vehicular Emissions	1.23	4.76	11.90	0.04	2.95	0.81
TOTAL	**4.37**	**5.13**	**21.22**	**0.04**	**3.03**	**0.88**
Significance Criteria	137	250	550	250	100	55
Significant?	*No*	*No*	*No*	*No*	*No*	*No*

Based on the discussion under XVI, below, the project would not generate traffic volumes that warrant preparation of a traffic study. Therefore, automobile emissions that result in violation of air quality standards are not anticipated. Based on the mixed-use land use, project emissions over the long-term are not anticipated to violate any air quality standard or contribute substantially to any existing or projected air quality violations. Impacts would be less than significant.

c)	Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state	☐	☐	☒	☐

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?				

Less Than Significant Impact. The SDAB is considered a non-attainment under Federal standards for O_3 (8-hour standard). As described above in response III(b), construction operations temporarily increase the emissions of dust and other pollutants. However, construction emissions would be temporary and short-term in duration. Implementation of Best Management Practices (BMPs) would reduce potential impacts related to construction activities to a less than significant level. Construction of the mixed-use development in the region would not create considerable ozone or PM_{10} from construction and operation. Therefore, the project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under applicable federal or state ambient air quality standards. Impacts would be less than significant.

d)	Create objectionable odors affecting a substantial number of people?	☐	☐	☒	☐

Less Than Significant Impact.

Short-Term (Construction) Emissions

Project construction could result in minor amounts of odor compounds associated with diesel heavy equipment exhaust during construction. These compounds would be emitted in various amounts and at various locations during construction. Sensitive receptors near the construction site include the residences bordering the project site's southern boundary and residences located to the east across 7th Avenue. However, odors are highest near the source and would quickly dissipate away from the source. Also, construction activities would be temporary, and the main use of heavy equipment would be during the first stages of development. After construction is complete, there would be no objectionable odors associated with the project. Thus, the potential for odor impacts associated with the project is less than significant.

Long-Term (Operational) Emissions

Typical long-term operational characteristics of the project are not associated with the creation of such odors nor anticipated to generate odors affecting a substantial number of people. The proposed project would construct 111 residential dwelling units, including 102 market rate units and nine affordable units restricted to very-low income households, and 4,800 square feet of commercial retail space. The project would not create uses that, in the long-term operation, would be typically associated with the creation of such odors nor are they anticipated to generate odors affecting a substantial number or people. Therefore, project operations would result in less than significant impacts.

IV. BIOLOGICAL RESOURCES – Would the project:

a)	Have substantial adverse effects, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

No Impact. The project site is fully developed within an urbanized area. No native habitat is located on-site. As such, the proposed project would not directly or through habitat modification effect any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by CDFW or USFW. Additionally, the project site is located outside the City's Multi-Habitat Preservation Area (MHPA). No impacts would occur.

b) Have a substantial adverse effect on any riparian habitat or other community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒

No Impact. Refer to IV.a., above. The project would not directly or indirectly impact any riparian habitat or other plant community. No impact would result.

c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including but not limited to marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒

No Impact. The project site is fully developed and does not contain any Federally protected wetlands as defined by Section 404 of the Clean Water Act. Therefore, no impacts would result. Also, refer to IV.a. above.

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	☒

No Impact. No formal and/or informal wildlife corridors are located on or near the project, as the site is located within a fully urbanized area. No impacts would result. Also, refer to IV.a., above.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒

No Impact. Refer to IV.a., above. The project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. No impact would result.

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation	☐	☐	☐	☒

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Plan, or other approved local, regional, or state habitat conservation plan?				

No Impact. Refer to IV.e., above. The proposed project is not located within a Multiple Species Conservation (MSCP) Program area. The project would not conflict with the provisions of the MSCP. No impact would result.

V. CULTURAL RESOURCES – Would the project:

a) Cause a substantial adverse change in the significance of an historical resource as defined in §15064.5?	☐	☐	☒	☐

No Impact. The purpose and intent of the Historical Resources Regulations of the Land Development Code (Chapter 14, Division 3, and Article 2) is to protect, preserve and, where damaged, restore the historical resources of San Diego. The regulations apply to all proposed development within the City of San Diego when historical resources are present on the premises. Before approving discretionary projects, CEQA requires the Lead Agency to identify and examine the significant adverse environmental effects which may result from that project. A project that may cause a substantial adverse change in the significance of a historical resource may have a significant effect on the environment (Sections 15064.5(b) and 21084.1). A substantial adverse change is defined as demolition, destruction, relocation, or alteration activities, which would impair historical significance (Sections 15064.5(b)(1)). Any historical resource listed in, or eligible to be listed in the California Register of Historical Resources, including archaeological resources, is historically or culturally significant.

The City of San Diego criteria for determination of historic significance, pursuant to CEQA, is evaluated based upon age (over 45 years), location, context, association with an important event, uniqueness, or structural integrity of the building. In addition, projects requiring the demolition of structures that are 45 years or older are also reviewed for historic significance in compliance with CEQA. CEQA Section 21084.1 states that "A project that may cause a substantial adverse change in the significance of a historical resource is a project that may cause a significant effect on the environment." Development on the project site occurred in 1989/1990. The project area is not located within an area identified as having historic resources on the California Historical Resources Inventory database and is not located within a City of San Diego historic district. Additionally, the project contains no structures, only a surface parking lot. As such, no impacts to the historic built environment would result.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☐	☒	☐

Less than significant impact. The project area is located within a high sensitivity area on the City of San Diego Historical Resources Sensitivity Maps for archaeological resources. Qualified City Staff conducted a CHRIS search, and determined that no archaeological resources are within the project site. Furthermore, the project site has been previously disturbed and is developed as a surface parking lot. Based upon these factors, impacts to archeological resources would not likely occur.

c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

Less Than Significant with Mitigation Incorporated. According to Geotechnical Report, the project site is underlain by Lindavista formation and San Diego Formation. According to the Significance Determination Thresholds of the City of San Diego, San Diego Formation has a high sensitivity and Lindavista formation has a moderate sensitivity

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

for paleontological resources. Projects in high sensitivity that excavate more than 1,000 cubic yards to a depth of ten feet or more, and moderate sensitivity formations that excavate more than 2,000 cubic yards to a depth of ten feet or more require paleontological monitoring during construction to mitigate for potential effects on paleontological resources. This project proposes 14,000 cubic yards of cut for the AT&T parking structure and 25,000 cubic yards of cut for the mixed-use building to a depth of 32 feet; therefore, the project could result in significant impacts to paleontological resources. To mitigate potential impacts, paleontological monitoring would be required during excavation activities. Section V of the Mitigation Monitoring and Reporting Program would be implemented for impacts to paleontological resources. Therefore, impacts would be less than significant.

d) Disturb and human remains, including those interred outside of dedicated cemeteries?	☐	☐	☒	☐

Less Than Significant Impact. Refer to V.A. above, additionally no formal cemeteries or human remains are known to exist on-site or in the vicinity. Furthermore, should human remains be discovered during ground-disturbing activities associated with redevelopment of the project site, work would be required to halt in that area and no soil would be exported off-site until a determination could be made regarding the provenance of the human remains via the County Coroner and Native American representative, as required. The project would be required to treat human remains uncovered during construction in accordance with the California Public Resources Code (Sec. 5097.98) and State Health and Safety Code (Sec. 7050.5).

VI. GEOLOGY AND SOILS – Would the project:

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

A site-specific Geotechnical Investigation was completed for the proposed project (Leighton and Associates, Inc., 2016). A copy of the Geotechnical Investigation can be found in Appendix A.

Less Than Significant Impact. During the late Pliocene, several new faults developed in Southern California, creating a new tectonic regime superposed on the flat-lying section of Tertiary and late Cretaceous rocks in the San Diego region. One of these fault systems is the Rose Canyon Fault Zone, which is considered the most significant fault within the San Diego Metropolitan area. The principal known onshore faults in southernmost California are the San Andreas, San Jacinto, Elsinore, Imperial, and Rose Canyon faults, which collectively transfer the majority of this deformation. The balance of the plate margin slip is taken by the offshore zone of faults which include the Coronado Bank, Descanso, San Diego Trough, and San Clemente faults, which lie off the San Diego and northern Baja California coastline. Most of the offshore faults coalesce south of the international border, where they come onshore as the Agua Blanca fault which transects the Baja, California peninsula.

The Rose Canyon Fault was first recognized by Fairbanks (1893). He described the feature as an area of uplifting or folding from La Jolla Bay to the Soledad Hills. Since that time, numerous others have mapped the Rose Canyon Fault and have attributed the formation of several physiographic features such as, Mount Soledad, Mission Bay, and San Diego Bay to the activity along the fault. The Rose Canyon Fault Zone (RCFZ) consists of predominantly

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

right-lateral strike- slip faults that extend southwest to southeast through the San Diego metropolitan area. Movement along the fault zone is generally complex and consists of various combinations of oblique, normal and strike-slip motion. The fault zone extends offshore at La Jolla and continues north-northwest subparallel to the coastline. To the south in the San Diego downtown area the fault zone appears to splay out into a group of generally right- normal oblique faults extending into San Diego Bay.

There are no known active faults have been mapped at or near the project site. The nearest known active surface fault is the San Diego section of the Newport-Inglewood-Rose Canyon fault zone, which roughly follows I-5 freeway, approximately 1.2 miles west of the site. The site is not located within a State of California Earthquake Fault Zone (EFZ). Therefore, the risk of fault rupture is considered low. Impacts would be less than significant.

ii) Strong seismic ground shaking?	☐	☐	☒	☐

Less Than Significant Impact. The site is considered to lie within a seismically active region, as can all of Southern California. Specifically, the Rose Canyon fault zone located approximately 1.2 miles west of the site is the 'active' fault considered having the most significant effect at the site from a design standpoint.

Utilizing 2013 California Building Code (CBC procedures), the site soil profile is characterized to be Site Class D based on geotechnical experience with similar sites in the project area and the results of subsurface evaluation. The effect of seismic shaking may be diminished by adhering to the California Building Code and state-of-the-art seismic design practices of the Structural Engineers Association of California. Because the project is required to follow the Building Code, impacts relative to seismic ground shaking are considered less than significant.

iii) Seismic-related ground failure, including liquefaction?	☐	☐	☐	☒

No Impact. Liquefaction and dynamic settlement of soils can be caused by strong vibratory motion due to earthquakes. Both research and historical data indicate that loose, saturated, granular soils are susceptible to liquefaction and dynamic settlement. Liquefaction is typified by a loss of shear strength in the affected soil layer, thereby causing the soil to behave as a viscous liquid. This effect may be manifested by excessive settlements and sand boils at the ground surface. Based on the geotechnical evaluation, the on-site soils are not considered liquefiable due to their dense condition and absence of a shallow groundwater condition. Considering planned grading and foundation design measures, dynamic settlement potential is also considered negligible.

Groundwater was observed via exploratory hollow-stem boring at a depth of approximately 83 feet below ground surface (approximate elevation 205 feet). The groundwater table may fluctuate with seasonal variations and irrigation, and local perched groundwater conditions may exist. Based on review of the conceptual plans, groundwater is not expected to be a constraint to site development. Temporary dewatering would not be necessary to complete the excavation of the proposed basement.

Due to underlying soils, the project site is not at risk seismic-related ground failing, including liquefaction. No impact would result.

iv) Landslides?	☐	☐	☐	☒

No Impact. Evidence of landslides were not observed on the project site, nor are there any geomorphic features indicative of landslides noted in the review of published geological maps. Further, given the topography of the site, the likelihood for seismically induced landslides is remote. No impact would result.

Issue		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b)	Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐

Less Than Significant Impact. Construction of the project would temporarily disturb on-site soils during grading activities, thereby increasing the potential for soil erosion to occur. However, the use of standard erosion control measures and implementation of storm water best management practices requirements during construction would preclude impacts. Impacts would be less than significant.

c)	Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐

Less Than Significant Impact. Please see VI.a.iv and VI.a.iii.

Based on the subsurface exploration and review of pertinent geologic literature and maps, the geologic units underlying the site consist of Undocumented Fill, underlain in turn by Quaternary-aged Very Old Paralic Deposits (formerly known as Lindavista Formation) and Tertiary-aged San Diego Formation. A brief description of the geologic units encountered on the site is presented below.

Undocumented Fill (Afu)
A generally thin (one- to five-foot thick) layer of undocumented artificial fill soils, apparently placed during the site's initial construction were observed across the site. The character of these fill soils varied across the site, but generally included reddish brown to dark reddish brown, moist, loose to medium dense, silty sand, gravelly sand, and clayey sand as well as localized clay. Based upon the field investigation, it is anticipated that the more plastic, clayey soils may be located below the proposed parking garage site. These soils are also expected to have greater potential for expansion. This unit would be removed and/or compacted with project construction.

Very Old Paralic Deposits (Qvop)
Previously, the site was mapped as being underlain by the Lindavista Formation (Kennedy, 1975). More recent mapping by Kennedy and Tan (2008) has renamed the previously mapped geologic formation as Very Old Paralic Deposits - Subunit 9. As encountered during the field investigation, this unit consists of reddish brown to orange-brown, dense to very dense, silty and clayey sands with trace gravels and sandy clays. Cemented interbeds, gravel layers, and hard concretionary layers were also encountered in this unit. Although not encountered during drilling operations, discrete cobbles or cobble layers are commonly encountered in this unit. These soils are suitable for use as structural fill provided they are free of rock fragments larger than six inches in maximum dimension. This unit, as encountered, varied in thickness from three feet to approximately 12 feet.

San Diego Formation (Tsd)
Tertiary-aged San Diego Formation underlies the entire site at depth and was observed extending to the total depth explored (91 feet below ground surface). As encountered, the San Diego Formation generally consisted of dense to very dense, brown to grayish brown and pale to light gray, moist, sandstone with silt and some interbedded gravel layers. Well cemented gravel conglomerate and concretions were also encountered during drilling. Based on geotechnical experience with similar sites in the area, excavations within this unit would encounter zones of poorly graded cohesionless sands that may cave or slough during unsupported site excavation and the performance of drilling excavation.

The project site is located within geologic hazards zone 52 as shown on the City's Seismic Safety Study Zone 52 is characterized by other level areas, gently sloping to steep terrain with favorable geologic structure, low risk.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

Additionally, the project would be constructed consistent with proper engineering design, in accordance with the California Building Code. Utilization of appropriate engineering design measures and standard construction practices, to be verified at the building permit stage, would ensure that potential impacts from geologic hazards, such as on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse, would be less than significant.

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	☐	☐	☒	☐

Less Than Significant Impact. Refer to VI.c. The project would be constructed consistent with proper engineering design, in accordance with the California Building Code. Utilization of appropriate engineering design measures and standard construction practices, to be verified at the building permit stage, would ensure that potential impacts from geologic hazards would be less than significant.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒

No Impact. The project site would be served by a public sewer system. No impact would occur.

VII. GREENHOUSE GAS EMISSIONS – Would the project:

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐

Less Than Significant Impact. In December 2015, the City adopted a Climate Action Plan (CAP) that outlines the actions that City will undertake to achieve its proportional share of State greenhouse gas (GHG) emission reductions. The purpose of the Climate Action Plan Consistency Checklist (CAP Checklist) is to, in conjunction with the CAP, provide a streamlined review process for proposed new development projects that are subject to discretionary review and trigger environmental review pursuant to CEQA.

Analysis of GHG emissions and potential climate change impacts from new development is required under CEQA. The CAP is a plan for the reduction of GHG emissions in accordance with CEQA Guidelines Section 15183.5. Pursuant to CEQA Guidelines Sections 15064(h)(3), 15130(d), and 15183(b), a project's incremental contribution to a cumulative GHG emissions effect may be determined not to be cumulatively considerable if it complies with the requirements of the CAP.

The Consistency Checklist is part of the CAP and contains measures that are required to be implemented on a project-by-project basis to ensure that the specified emissions targets identified in the CAP are achieved. Implementation of these measures would ensure that new development is consistent with the CAP's assumptions for relevant CAP strategies toward achieving the identified GHG reduction targets. The completed CAP Checklist for the project is located in Appendix B.

Under Step 1 of the CAP Checklist, the project is consistent with the existing General Plan designation and zoning for the site. Therefore, the project is consistent with the growth projections and land use assumptions used in the

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

CAP. Furthermore, completion of Step 2 of the CAP 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. These project features will be assured as a condition of project approval. Thus, the project is consistent with the CAP.

Based on the project's consistency with the City's CAP Checklist, the project's contribution of GHGs to cumulative statewide emissions would be less than cumulatively considerable. Therefore, the project's direct and cumulative GHG emissions would have a less than significant impact on the environment.

b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☐	☒

No Impact. Refer to VII.a., above.

VIII. HAZARDS AND HAZARDOUS MATERIALS – Would the project:

a) Create a significant hazard to the public or the environment through routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐

Less Than Significant Impact. The proposed project would develop a mixed-use residential and commercial development, as well as a separate parking structure. During project construction, small amounts of solvents and petroleum products could be utilized; and although minimal amounts of such substances may be present during construction, they are not anticipated to result in a significant hazard to the public. During the operational phase of the project, the routine transport, use or disposal of hazardous materials is not anticipated. Although small amounts of hazardous materials may be used for cleaning and maintenance, standard best management practices (BMPs) would be applied to ensure that all hazardous materials are handled and disposed of properly and that no hazards would result during the long-term operation of the project. Hazardous materials and waste would be managed and used in accordance with all applicable federal, state, and local laws and regulations; the project would not be a significant hazard to the public or environment. Impacts would be less than significant.

b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☐	☒

No Impact. The proposed project would develop a mixed-use residential and commercial development, as well as a separate parking structure. As such, the project would not require the routine transport, use or disposal of hazardous materials. Therefore, the project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. No impact would result.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within	☐	☐	☐	☒

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
one-quarter mile of an existing or proposed school?				

No Impact. The project site is within one-quarter-mile of the Aces Academy (3715 6th Avenue) and All Saints' Episcopal Preschool (3674 7th Avenue). However, the project would not emit hazardous emissions or handle hazardous materials, substances, or waste. No impacts would result.

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒

No Impact. The project site has not been identified as a hazardous materials site pursuant to Government Code Section 65962.5. Therefore, the proposed project would not create a significant hazard to the public or the environment relative to known hazardous materials sites. No impacts would occur.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two mile of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☒	☐

Less Than Significant Impact. The basic function of ALUCPs (or Compatibility Plans) is to promote compatibility between airports and the land uses that surround them to the extent that these areas are not already devoted to incompatible uses. With limited exception, California law requires preparation of a compatibility plan for each public-use and military airport in the state. Most counties have established an airport land use commission (ALUC), as provided for by law, to prepare compatibility plans for the airports in that county and to review land use plans and development proposals, as well as certain airport development plans, for consistency with the compatibility plans. In San Diego County, the ALUC function rests with the San Diego County Regional Airport Authority (SDCRAA), as provided in Section 21670.3 of the California Public Utilities Code. The project site is within the Airport Influence Area (AIA) Review Area 2 and Federal Aviation Administration Part 77 Noticing Area for San Diego International Airport. Since the project is within AIA Review Area 2, the City is not required to submit the proposed project to the San Diego County Regional Airport Authority, serving as the Airport Land Use Commission (ALUC), for a consistency determination with the adopted ALUCP for SDIA if the applicant provides an FAA Determination of No Hazard letter or No FAA Notification Self-Certification Agreement. The project completed the No FAA Notification Self-Certification Agreement (May 2017); as such, no impacts relative to a public airport would result. The No FAA Notification Self-Certification Agreement is included in Appendix C. Therefore, no significant impact would result.

f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒

No Impact. The project site is not located within the vicinity of a private airstrip. No impact would result.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐

Less Than Significant Impact. The project proposes development within an urbanized portion of the community on a site that is already fully developed. No change to the existing circulation network would occur. The proposed project would not impair or physically interfere with the implementation of an adopted emergency response plan or emergency evacuation plan. The project would not significantly interfere with circulation or access. Impacts would be less than significant.

h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☐	☐	☒

No Impact. The project site is located within an urbanized developed area and does not interfere with any wildland spaces. No impact would result.

IX. HYDROLOGY AND WATER QUALITY - Would the project:

a) Violate any water quality standards or waste discharge requirements?	☐	☐	☒	☐

A Storm Water Quality Management Plan was completed for the proposed project (San Dieguito Engineering, 2017). A copy of the Storm Water Quality Management Plan is included in Appendix D. Additionally, a Drainage Study was prepared for the proposed project (San Dieguito Engineering, 2016), as well as a sewer study for 7th Avenue (San Dieguito Engineering, 2017). A copy of the Drainage Study is included in Appendix E; a copy of the 7th Avenue Sewer Replacement Technical Memorandum is included in Appendix F.

Less Than Significant Impact. Potential impacts to existing water quality standards associated with the proposed project would include minimal short-term construction-related erosion/sedimentation and no long term operational storm water discharge. Conformance to BMPs outlined in the Water Pollution Control Plan (WPCP) and conformance with the City's Storm Water Standards would prevent or effectively minimize short-term water quality impacts. Therefore, the proposed project would not violate any existing water quality standards or discharge requirements. Impacts would be less than significant.

b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for	☐	☐	☐	☒

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
which permits have been granted)?				

No Impact. The project does not require the construction of wells or the use of groundwater. Furthermore, the project would not introduce significant new impervious surfaces that could interfere with groundwater recharge, as the site is already fully developed with impervious surfaces. Therefore, the proposed project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge. No impact would result.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner, which would result in substantial erosion or siltation on- or off-site?	☐	☐	☐	☒

No Impact. There are no streams or rivers within the project boundary. Additionally, per the project Drainage Study (San Dieguito Engineering, 2016), the project would honor the current flow patterns on-site. Therefore, the project would not substantially alter any existing drainage patterns. No impact would result.

d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner, which would result in flooding on- or off-site?	☐	☐	☐	☒

No Impact. Per the project Drainage Study, site flow conveyance of runoff for Q50 (the 50 percentile flow or the flow which was equaled or exceeded for 50 percent of the flow record) flow is 2.3 cubic feet per second (cfs) for existing basin EX-A and 1.38 cfs for existing basin EX-B. The proposed project would result in flows of 1.79 cfs to basin EX-A and 1.04 cfs to basin EX-B. As such, the project would result in 20 percent less flow than the existing conditions. As such, no impact to the amount of runoff would result.

e) Create or contribute runoff water, which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☒	☐

Less Than Significant Impact. Refer to IX.a. through IX.d., above. The project would not exceed the capacity of the existing or planned storm water drainage system. To comply with current storm water regulations, on-site low impact design (LID) and integrated management practices (IMP) would be implemented to control peak runoff from the proposed development, including utilizing installation of two dry wells (one at the mixed-use component and one at the AT&T garage). Project review by qualified City staff determined that the project would not exceed the capacity of the existing storm sewer system. Adherence with the standards would preclude a cumulatively considerable contribution to water quality. Impacts would be less than significant.

f) Otherwise substantially degrade water quality?	☐	☐	☒	☐

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

Less Than Significant Impact. Refer to IX.a., above. The project would implement LID and source control and treatment control BMPs as required by the City's Storm Water Standards. These requirements have been reviewed by qualified staff and would be re-verified during the ministerial process. Adherence to the standards would preclude a cumulatively considerable contribution to water quality. Impacts would be less than significant.

g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	☐	☐	☐	☒

No Impact. According to a Federal Emergency Management Agency (FEMA) flood insurance rate map (FEMA, 2012); the site is not located within a floodplain. Based on a review of topographic maps, the site is not located downstream of a dam or within a dam inundation area. Based on this review and site reconnaissance, the potential for flooding of the site is considered nil. No impact would result.

h) Place within a 100-year flood hazard area, structures that would impede or redirect flood flows?	☐	☐	☐	☒

No Impact. Refer to IX.a., above. No impact would result.

X. LAND USE AND PLANNING – Would the project:

a) Physically divide an established community?	☐	☐	☐	☒

No Impact. The project would utilize existing right-of-way and roadways. The project would not physically divide the community. No impact would result.

b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐

Less Than Significant Impact. Because the project was deemed complete prior to the adoption (November 2016) and implementation (February 2017) of the Uptown Community Plan Update, the proposed project is being processed under the 1988 Uptown Community Plan, which was the adopted Community Plan at the time the project application was deemed complete, and the corresponding Mid-Cities Planned District Ordinance.

The 1988 Uptown Community Plan designates the approximately 1.0-acre site as Residential High Density (44-73 dwelling units per acre) and Mixed-Use Commercial with Very-High Intensity (up to 109 dwelling units per acre). This allows 82 units to be developed on site over both land use plan designations. Through the utilization of the Affordable Housing Density Bonus Ordinance, the proposed project is seeking a 35 percent density bonus for the incorporation of nine Very-Low Income-restricted dwelling units. In total, the project would include 111 residential

dwelling units, commercial uses, parking, and an additional parking structure for the adjacent AT&T facility that is allowed by an existing CUP.

The Residential Element of the 1988 Community Plan contains the objective of concentrating medium and high-density housing (1) on upper floors as part of mixed use development in commercial areas, (2) adjacent to commercial areas, and (3) near transit and higher volume traffic corridors. Additionally, the Residential Element of the 1988 Community Plan contains the objective to locate higher density residential development in appropriate areas to promote safer and livelier commercial districts. The proposed project includes residential above commercial, and would be located directly adjacent to the Hillcrest commercial core and within walking distance of six bus lines and near to SR-163. Its direct proximity to the commercial core will bring more foot traffic to the businesses in the area, resulting in a safer and livelier commercial district. As proposed, the project meets the community plan's objectives in the Residential Element about high density housing.

The Commercial Element of the 1988 Community Plan outlines mixed-use development areas including the northern portion of the project area and states that building heights should range from high-rise to two stories. The proposed project height ranges from 13 feet to 84 feet, or six to seven floors, in accordance with the mixed-use description in the Commercial Element. Although existing developments within the vicinity of the proposed project consist of a mixture of lower-scale structures and higher-scale structures, these properties are located within commercial and residential areas where the 1988 Community Plan recommends mixed-use development at very high residential densities and residential development at high densities. Two existing multi-family residential tower developments of 15 stories each are located two blocks south of the project on 7th Avenue.
The project requires incentives to deviate from height and setback requirements to build the 111 units and commercial space, while also providing architectural variation through offsetting planes and varying roof heights to implement the Urban Design policies of the Uptown Community Plan.

The first incentive is to deviate from the building height standard. The proposed building height is 84 feet. Per former Municipal Code Section 1512.0205(a)(1), a 65-foot maximum height is permitted in Area B (north of Upas, in which the project site falls) and 60 feet in the MR-800B zone (Table 1512-03F). the requested incentive would allow the project to exceed the height standard to allow an 84-foot-tall building in the CN-1A zone, and a 76-foot-tall building in the MR-800B zone. The average height of the proposed detached subterranean parking structure is 13 feet above grade and would include a 19'8" tower.

Incentive 1				
Building Height	**Required**	**Proposed**	**Zone**	**Code Section**
Maximum Structure Height	65 ft	84 ft	CN-1-A	1512.0205
Maximum Structure Height	60 ft	76 ft	MR-800B	Table 1512-03F

The second incentive is for setbacks. Per former Municipal Code Section 1512.0303(d)(4)(E), an eight-foot rear setback is required for each story above the second story. Per former Municipal Code Section 1512.0303(d)(4)(B), a side setback of nine feet is required for each story above the second story. Per former Municipal Code Table 152-03E, a zero-foot rear setback (alley) is required. Further, per former Municipal Code Section 1512.0308(b)(8)(b) (CN-1-A), the street wall shall not exceed 36 feet in height with additional height of the structure step back at least 15 feet from the base of the wall. Along 7th Avenue and Robinson Avenue, the project does not comply, requiring approval of the incentives. The rear, side, and street wall setbacks are considered one incentive, due to the split zoning across site. The setback incentive is necessary to maintain the height of the structure at the context-sensitive height currently proposed.

Incentive 2				
Step Backs	**Required**	**Proposed**	**Zone**	**Code Section**
Rear Yard Setback (alley)	1 ft	0 ft	MR-800B	Table 1512-03E
Rear Yard Upper Floor Step Back, 3rd floor and above (alley)	8 ft	0 ft	MR-800B	1512.0303(d)(4)(E)

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Side Yard Upper Floor Step Back, 3rd floor and above (south elevation)	9 ft	0 ft	MR-800B	1512.0303(d)(4)(B)
Street Wall Step Back for portion of structure over 36 ft tall (Robinson)	15 ft	0 ft on floors 2-3 10' on floors 4-7	CN-1-A	1512.0309(b)(7)(B)

The 1988 Community Plan recommends several measures to offset the bulk and scale of new development such as wall texture variation and building articulation to relate to the form and scale of surrounding structures. Offsetting planes would be provided via the building massing along 7th Avenue in combination with the recessed balconies on all elevations. The offsetting planes would all be less than 50 feet wide. Variations in materials, textures, and colors on all exteriors enhances would also provide visual relief along 7th Avenue and Robinson Avenue. Additionally, the variation in height and the metal slat eaves create varied roof forms on the building.

In addition to the visual relief, the project meets the intent of reflecting the surrounding scale of development by designing the project with an emphasis upon pedestrian access. This includes entry porches for the residential ground floor units, retail entrance from the street and large windows on the ground floor, brick veneer on the storefronts, and manicured and maintained landscaped street yards. These varied design features result in a positive pedestrian experience that reflects the historic scale of surrounding development, which is walkable and pedestrian-oriented. Additionally, a roof level outdoor patio space with Jacuzzi and a second story outdoor patio with barbeque grills would accommodate recreational activities for residents as recommended in the Site Planning and Architecture Urban Design Guidelines of the 1988 Uptown Community Plan.

The vehicular circulation section of the Urban Design Element of the 1988 Community Plan indicates that access should be taken from the alleys whenever possible and that off-street parking should be placed underground and/or screened from the public right of way and adjacent residences. The proposed residential and commercial development would provide three levels of enclosed and underground parking below the building, which would be accessed from the alley between 6th Avenue and 7th Avenue.

The project site has two zones. The CN-1A zone covers the northern one-quarter of the project site, along Robinson Avenue, and the MR-800B zone covers the balance of the site. The MR-800B allows multi-family residential density of one dwelling unit per 800 square feet, or one dwelling unit per 600 square feet through a bonus for parcel accumulation, which the project receives, and CN-1A allows neighborhood commercial with residential density of one dwelling unit per 400 square feet. The bonus density (Table 1512-03C) is 600 square feet per dwelling unit or 47 dwelling units in the MR-800B zone if 90 percent of project parking is underground parking, which the project proposes. A density (Table 1512-03M) of one dwelling unit per 400 square feet or 35 dwelling units is permitted in the CN-1-A zone. The base zone for the project site allows for 82. An inclusion of nine very-low-income units (11 percent of the total unit count) results in a 35 percent density bonus, which allows for a bonus of 29 units, bringing the project total to 111 dwelling units.

With implementation of project incentives allowed by San Diego Municipal Code Table 143-07A, which describes the City's Affordable Housing Density Bonus Regulations and the State of California Density Bonus Law, the project would not result in a conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project. Project impacts would be less than significant.

c)	Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☒	☐

Less Than Significant Impact. Refer to IV.f., above.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XI. MINERAL RESOURCES – Would the project?				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒

No Impact. There are no known mineral resources located on the project site. The urbanized and developed nature of the site and vicinity would preclude the extraction of any such resources. However, the proposed project does not preclude the extraction of such resources that may be discovered in the future. The project site is not currently being utilized for mineral extraction and does not contain any known mineral resources that would be of value to the region. No impact would result.

b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

No Impact. Refer to XI.a., above. The project area has not been delineated on a local General Plan, specific plan, or other land use plan as a locally important mineral resource recovery site, and no such resources would be affected with project implementation. No impact would result.

XII. NOISE – Would the project result in:				
a) Generation of, noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☒	☐	☐

Landrum & Brown prepared a Noise Analysis for the project (July 6, 2017). The Noise Analysis is included in Appendix G.

Less Than Significant Impact with Mitigation Incorporated.

Construction Noise

Construction of the project would generate a temporary increase in noise in the project area. Short-term noise impacts would be associated with on-site demolition, excavation, grading, and construction activities of the proposed project. Construction-related short-term noise levels would be higher than existing ambient noise levels in the project area, but would no longer occur once construction is completed.

Construction activity would occur during allowable times, in compliance with Section 59.5.0404 of the San Diego Municipal Code. The San Diego Municipal Code states that construction noise in residential zones should not reach an average sound level greater than 75 dBA Leq during the 12-hour period from 7:00 a.m. to 7:00 p.m. Construction of the project is generally expected to comply with the City's 75 dBA Leq (12 hour) noise limit. However, to ensure that sound levels do not exceed the thresholds of the ordinance, a temporary sound barrier along the south side of the project would be required for the duration of construction activities. The sound barrier would consist of either plywood with a total thickness of 1.5 inches or a sound wall blanket with a Sound Transmission Class (STC) rating of 27. Therefore, implementation of the sound barrier would mitigate project impacts to below a level of significance.

General Plan

The City of San Diego specifies outdoor and indoor noise limits for residential land uses. Both standards are based upon the CNEL index. CNEL (Community Noise Equivalent Level) is a 24- hour time-weighted annual average noise level based on the A-weighted decibel. A weighting is a frequency correction that correlates overall sound pressure levels with the frequency response of the human ear. Time weighting refers to the fact that noise that occurs during certain noise- sensitive time periods is given more significance because it occurs at these times. In the calculation of CNEL, noise occurring in the evening time period (7 p.m. to 10 p.m.) is weighted by 5 dB, while noise occurring in the nighttime period (10 p.m. to 7 a.m.) is weighted by 10 dB. These time periods and weighting factors are used to reflect increased sensitivity to noise while sleeping, eating, and relaxing.

The project must comply with the City's 70 dB CNEL exterior noise standard identified in General Plan Table NE-3. The total projected noise level at the east yard area along 7th Avenue on the east side of the project site is expected to be 61.9 dB CNEL. This value is less than the exterior noise standard of 70 dB CNEL, therefore noise attenuation will not be required for this area of the project. The results of the analysis indicate that the noise level at the exterior of the building facing Robinson Avenue would be exposed to a future noise level as high as 67 dB CNEL. The level is consistent with the noise level guidelines found in Table NE-3, "Land Use – Noise Compatibility Guidelines" in the Noise Element of the General Plan. The project would not result in a significant noise impact to the units facing 7th Avenue or Robinson Avenue. Noise attenuation measures would not be required.

The project must comply with the City of San Diego indoor noise standard of 45 dB CNEL. In order to meet the interior noise standard, the building must provide sufficient outdoor-to-indoor building attenuation to reduce the noise to acceptable levels. The outdoor-to-indoor noise reduction characteristics of a building are determined by combining the transmission loss of each of the building elements that make up the building. Each unique building element has a characteristic transmission loss. For residential units, the critical building elements are the roof, walls, windows, doors, attic configuration and insulation. The total noise reduction achieved is dependent upon the transmission loss of each element, and the surface area of that element in relation to the total surface area of the room. Room absorption is the final factor used in determining the total noise reduction.

Title 24 establishes an interior noise standard of 45 dBA CNEL for multiple unit and hotel/motel structures. Exterior building surfaces in the project will be exposed to a maximum noise level of about 67 dB CNEL, and therefore, the dwelling units would require at least 22 dB of exterior-to- interior noise reduction in order to meet the City's 45 dB CNEL interior noise standard. With residential construction practices typical in California, dwelling units provide at least 20 dB of exterior-to-interior noise reduction. Detailed engineering calculations are necessary for building attenuation requirements greater than 20 dB. A future study would be needed to address the interior noise levels when architectural drawings are finalized, and prior to the issuance of building permits. When that analysis is completed, it would include any noise attenuation measures necessary for the residential dwelling units to meet the 45 dB CNEL interior noise standard. Noise attenuation measures may include upgraded windows, upgraded doors, or upgraded roof or wall assemblies. When those noise attenuation measures are incorporated into the project, then each of the dwelling units would meet the 45 dB CNEL standard. At that time, the project would be consistent with Table NE-3 (Land Use-Noise Compatibility Guidelines) of the City's Noise Element of the General Plan.

HVAC Noise Levels – Adjacent Residences to the East and South

Project operational noise levels are related to heating, ventilation, and air conditioning (HVAC) equipment. The project would include 111 living units on seven levels, along with commercial and leasing spaces on the first floor. There would be 117 HVAC units located on the roof of the mixed-use building.

A noise analysis was prepared to determine the projected noise level of the HVAC units at the residential receivers located adjacent to the project site. The nearest homes to the east are located across 7th Avenue. The HVAC units located on the roof would be at an elevation of 82 feet above the elevation of these homes and the HVAC units located on the seventh floor would be at an elevation of 68 feet above the elevation of the homes. For purposes of calculating the worst-case potential impact to the homes to the east of the project, all the HVAC units on both floors were assumed to be located at the east end of their respective equipment pad areas. It was also assumed as a worst-case condition that all the units would be operating at the same time. Given these conditions, the projected total noise level from all 117 units was calculated to be 31.6 dBA Leq at the exterior of the nearest residential property to the east. Interior noise levels at the nearest residential property would be less due to the noise attenuation provided by building walls and windows. This is significantly below the nighttime residential noise ordinance limit of 40 dBA. No impact would result.

Calculations made to determine the projected noise level of the HVAC units at the residential receivers located south of the project site. The nearest homes to the south are located adjacent to the existing parking lot on the current project site. The HVAC units located on the roof of the proposed mixed-use building would be at an elevation of 81 feet above the elevation of the homes to the south and the HVAC units located on the seventh floor would be at an elevation of 67 feet above the elevation of the homes. For purposes of calculating potential impacts to the homes to the south of the project, all of the HVAC units on both floors were assumed to be located at the south end of their respective equipment pad areas. It was also assumed as a worst-case condition that all the units would be operating at the same time. The projected total noise level from all 117 units was calculated to be 42 dBA Leq at the exterior of the nearest residential property to the south. This would exceed the nighttime residential noise ordinance limit of 40 dBA, resulting in a significant noise impact requiring mitigation. Implementation of the Mitigation Monitoring and Reporting Program as detailed in Section V of the Mitigated Negative Declaration would reduce potentially significant impacts to below a level of significance.

To mitigate this potential impact to residences to the south, a mitigation measure would require that a permanent mechanical enclosure be installed around the HVAC units to reduce the noise. As the HVAC units are about three feet in height, a noise barrier, four feet in height relative to the pad elevation of the HVAC units, would be constructed around the perimeters of the two groups of HVAC units to reduce the noise level at the homes to the south to below the nighttime residential noise ordinance limit of 40 dBA. Impacts would be less than significant with incorporation of mitigation. This structure would also reduce noise levels at the homes to the east to 28.8 dBA Leq.

Land uses to the west and the north include a mix of commercial retail and commercial office buildings. The nighttime noise limit for commercial uses is 60 dBA. The worst-case calculation of noise levels from HVAC units would be well below this limit. No impact would result.

HVAC Noise Levels – Within Proposed Mixed-Use Building

There would be 90 HVAC units clustered together on the roof of the structure. As a worst case, it is assumed that 44 of the units would be the model CH14NB018, and the remaining 46 units would be the model CH14NB024. The CH14NB018 units generate a noise level of 52.6 dB at a distance of five feet, and the CH14NB024 units have a noise level of 56.6 dB at a distance of five feet. If all 90 of these units were to operate simultaneously, the resulting noise level would be approximately 75 dBA at a distance of five feet. The roof-ceiling assembly is expected to be a flat, built-up assembly with plywood on the top, roof trusses, insulation, and gypsum board on the bottom. An assembly of this construction is expected to achieve a noise rating of about 38 dB. The resulting noise level within the rooms located directly below the HVAC units is expected to be less than 37 dBA. The above design features would be a condition of approval.

A noise level of this magnitude would meet the Noise Criteria (NC) curve of 30, which is the noise level guideline recommended by the American Society of Heating, Refrigerating and Air Conditioning Engineers (ASHRAE) for

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

mechanical equipment within a residential development. No operational impact is expected for the dwellings within the project, therefore no attenuation measures are required.

Therefore, incorporation of the mitigation measures as outline in Section V would reduce impacts to below a level of significance.

b) Generation of, excessive ground borne vibration or ground borne noise levels?	☐	☐	☒	☐

Less Than Significant Impact. This project would implement conventional construction techniques and equipment. Standard equipment such as scrapers, graders, backhoes, loaders, tractors, cranes, and miscellaneous trucks would be used for construction of most project facilities. As described in response XII(a) above, potential effects from construction noise would be addressed through compliance with City restrictions. Excessive ground borne vibration or ground borne noise is not anticipated with construction of the project, because the project would utilize mat foundation that does not require pile driving and the use of pylons. No mitigation measures are required.

c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐

Less Than Significant Impact. Substantial increases in ambient noise levels would not result because the proposed uses on-site are consistent with uses present in the surrounding area. Furthermore, the mitigation measures for the HVAC units described above would also reduce ambient noise. Any other ambient noise emanating from the proposed project would be typical of that associated with an urban neighborhood, such as people talking on balconies or sound escaping from open windows. The parking associated with the proposed project would not result in an increase in ambient noise levels, as both the separate parking structure and the parking for the mixed-use building are subterranean. Therefore, no substantial increase in ambient noise levels is anticipated. Impacts would be less than significant.

d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above existing without the project?	☐	☐	☒	☐

Less Than Significant Impact. Refer to XII.a.

e) For a project located within an airport land use plan, or, where such a plan has not been adopted, within two miles of a public airport or public use airport would the project expose people residing or working in the area to excessive noise levels?	☐	☐	☐	☒

No Impact. The project site is located within the Airport Influence Area and the FAA Part 77 Noticing Area for San Diego International Airport; a No FAA Notification Self-Certification Agreement was completed for the proposed

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

project (Appendix C). The project site is located outside the airport noise contours. As such, the project site would not be exposed to excessive aircraft noise. No impact would result.

f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

No Impact. The project site is not located within vicinity of a private airstrip. No impact would result.

XIII. POPULATION AND HOUSING – Would the project:

a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☒

No Impact. The project proposes the development of 111 residential units and does not involve the extension of roads or services, as the project is an infill project located within an existing urban community. The project density is consistent with the underlying zoning and the 1988 Community Plan. Therefore, the project would not induce substantial population growth in the area. No impact would result.

b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

No Impact. There is no existing housing within the project site. No housing would be displaced by the project. No impact would result.

c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

No Impact. There is no existing housing within the project site. No population would be displaced by the project. No impact would result.

XIV. PUBLIC SERVICES

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

i) Fire Protection	☐	☐	☒	☐

Less Than Significant Impact. The project site is located in an urbanized area where fire protection services are already provided. The project would not adversely affect existing levels of fire protection services to the area, and would not require the construction of new or expanded governmental facilities. Impacts to fire protection would be less than significant.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
ii) Police Protection	☐	☐	☒	☐

Less Than Significant Impact. The project site is located in an urbanized area where police protection services are already provided. The project would not adversely affect existing levels of police protection services to the area, and would not require the construction of new or expanded governmental facilities. Impacts to fire protection would be less than significant.

iii) Schools	☐	☐	☒	☐

Less Than Significant Impact. The project involves the development of 111 multi-family units within a mixed-use project. Although it would increase population, the residential component of the development is within the allowed density of the 1988 Uptown Community Plan and would not require the expansion of an existing or construction of a new school. Impacts would be less than significant.

v) Parks	☐	☐	☒	☐

Less Than Significant Impact. The project involves the development of 111 multi-family units within a mixed-use project. Although it would increase population, the residential component of the development is within the allowed density of the 1988 Uptown Community Plan and would not result in the need to expand and existing or construct a new park facility. Impacts would be less than significant.

vi) Other public facilities	☐	☐	☒	☐

No Impact. The project site is located in an urbanized area where City services are already provided. The project would not adversely affect existing levels of facilities to the area, and would not require the construction of new or expanded governmental facilities. No impacts to other public facilities would occur.

XV. RECREATION

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐

Less Than Significant Impact. The project would increase the use of existing parks or recreational facilities, as the project would generate new population. However, the increased use attributable to this project is not expected to result in substantial physical deterioration of existing community recreational facilities. Less than significant impact would result.

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	☐	☐	☐	☒

No Impact. The project involves the construction of a mixed-use project, which includes 111 residential units. On-site private recreational amenities would be provided in the form of a fitness center and pool. The impacts of

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

constructing those facilities are included with the overall construction of the proposed project. The project does not require the construction or expansion of recreational facilities. No impact would result.

The project is consistent with the underlying zone, the 1988 Community Plan land use designation, and population projections for the community. The project would not adversely affect the availability of and/or need for new or expanded recreational resources. The project would not significantly increase the use of existing neighborhood or regional parks or other recreational facilities. Therefore, the project is not anticipated to result in the use of available parks or facilities such that substantial deterioration occurs, or that would require the construction or expansion of recreational facilities to satisfy demand. As such, no significant impacts related to recreational facilities have been identified.

XVI. TRANSPORTATION/TRAFFIC – Would the project?

a)	Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	☐	☒	☐	☐

KOA Corporation prepared the 7th & Robinson Traffic Assessment (December 6, 2017), included as Appendix I, which analyzed trip generation, trip distribution/assignment, intersection analysis, and street segment analysis. The Traffic Assessment evaluated four scenarios: Existing, Existing with Project, Near Term (opening day, 2019) without Project, and Near Term (opening day, 2019) with Project.

Less Than Significant Impact with Mitigation Measures Incorporated. The project is consistent with the 1988 Community Plan land use designation and underlying zone. The project would not change existing circulation patterns on area roadways. Based on the City's Trip Generation Manual, the project would generate approximately 858 average weekday trips (ADT), assuming six trips per residential unit and 40 trips per 1,000 square feet of commercial space. Trip generation includes 59 morning (AM) peak hour trips (14 in, 45 out) and 78 afternoon (PM) peak hour trips (51 in, 27 out). Intersection analysis conducted per City of San Diego guidelines concluded that no significant impacts to study intersections (6th Avenue and Robinson Avenue and 7th Avenue and Robinson Avenue) would occur in the Existing Plus Project and Near Term Plus Project scenarios.

The City of San Diego has published daily traffic volume standards for roadways within its jurisdiction. To determine project impacts on study area roadway segments, the expected daily traffic volumes were compared to the daily capacity of the study area roadway segments. Robinson Avenue is classified as a two-lane Collector with LOS E capacity of 8,000 vehicles per day. Existing weekday traffic volume on Robinson Avenue between 6th Avenue and 7th Avenue is approximately 9,047 ADT; this roadway segment currently operates at level of service (LOS) F, with a volume-to-capacity ratio (v/c) of 1.13. The proposed project would increase existing traffic volumes to 9,390 ADT and the roadway segment would continue to operate at LOS F with a v/c of 1.18, resulting in an increase in v/c of 0.05, a significant direct traffic impact per City thresholds. Near Term analysis shows the roadway segment would have approximately 9,228 ADT, operating at LOS F with a v/c of 1.15 without the proposed project and

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

9,571 ADT, operating at LOS F with a v/c of 1.20 with the proposed project. This increase in v/c of 0.05 would result in a significant direct impact.

Mitigation for this impact includes restriping of Robinson Avenue to include a continuous center left turn lane to increase the segment capacity by allowing left turning vehicles to not block through traffic. A turn lane would also be provided for the westbound left turn movement at 7th Avenue. Additionally, the signal at the intersection of Robinson Avenue and 7th Avenue would be required to be modified. When mitigated, the segment of Robinson Avenue between 6th Avenue and 7th Avenue would have a v/c of 0.64 and would operate at LOS C. The mitigation measure would require the removal of two parking spaces and one loading zone located on the north side of Robinson Avenue (three spaces on the south side must be eliminated to provide fire access to the project). In order to maintain the existing loading zone, it would be re-located to 7th Avenue by removing one parking space on the west side of 7th Avenue. Implementation of the Mitigation Monitoring and Reporting Program as detailed in Section V of the Mitigated Negative Declaration would reduce potentially significant impact to below a level of significance.

b)	Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	☐	☒	☐	☐

Less Than Significant Impact with Mitigation Measures Incorporated. Impacts are considered less than significant with implementation of mitigation identified in Section V.

c)	Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☐	☒

No Impact. Implementation of the project would not result in a change in air traffic patterns, as the project is not located within the immediate vicinity of an airport or airstrip and would not be constructed at a height that would impair air travel. The project site is within FAA Part 77 Noticing Area (San Diego International Airport). A Self-Certification Agreement was completed for the proposed project (Appendix C). The project would not result in a substantial safety risk. No significant impact would result.

d)	Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒

No Impact. Access points to the parking facilities have been designed consistent with the City's engineering standards, and would not create a hazard for vehicles, bicycles, or pedestrians entering or exiting the site. The building envelope has been designed to accommodate appropriate visibility triangles at driveways and intersections, to include the intersection of 7th Avenue and Robinson Avenue, as well as the alley, and would not create a hazardous condition at these points. The project would not include any project elements that could create a hazard to the public. No significant impacts would result.

Issue		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e)	Result in inadequate emergency access?	☐	☐	☐	☒

No Impact. Project design is subject to City review and approval for consistency with all design requirements for emergency access. The project was reviewed and approved by the City's Fire Plan staff. No impacts would result.

f)	Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	☐	☐	☐	☒

No Impact. The project would provide 56 bicycle parking space for residents and six commercial bicycle parking spaces. The provision of bicycle parking supports bicycle travel within the community. The project includes accessible travel routes throughout the site to 7th Avenue and Robinson Avenue, making foot travel safe and easy. As such, the project supports active transportation and the active transportation network. Although 7th Avenue and Robinson Avenue are not serviced by bus transit, University Avenue (one block to the north) and 5th and 6th Avenues (two blocks and one block to the west, respectively) are served by multiple bus routes, placing transit in walking distance of the project site. The project would not interfere with any public transit policies, plans, or programs. No impact would result.

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

a)	Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☐	☒	☐

Less Than Significant Impact. The project would not cause a substantial adverse effect to tribal cultural resources, as there are no recorded sites listed or sites eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined by the Public Resources Code Section 5020.1(k). No impact would result.

b)	A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☐	☒	☐

Less Than Significant Impacts. In accordance with the requirements of Public Resources Code 21080.3.1, the City of San Diego engaged the Iipay Nation of Santa Isabel and the Jamul Indian Village, both traditionally and culturally

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

affiliated with the project area. These tribes were notified of the project via certified letter and email on June 9, 2017. Both Native American tribes responded within the 30-day formal notification period requesting consultation. Consultation took place on July 14, 2017, with both Native American tribes who determined the project site did not contain any tribal cultural resources traditionally or culturally affiliated with either tribe, and further evaluation was not necessary; consultation under Public Resources Code 21080.3.1 was therefore concluded. No impact would result.

XVIII. UTILITIES AND SERVICE SYSTEMS – Would the project:

a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☒	☐

Less Than Significant Impact. Because the site is located in an urbanized and developed area, and is consistent with the community plan, adequate municipal sewer services are available to serve the project. Wastewater would not be treated on-site. The project would not exceed wastewater treatment requirements. Project impacts would be less than significant.

b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐

Less Than Significant Impact. Refer to XVII.a., above.

c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐

Less Than Significant Impact. Refer to IX.e., above. The project would not exceed the capacity of the City's existing storm water drainage system and would require the expansion of the system. A Technical Memorandum determined that the existing six-inch sewer main located within 7th Avenue fronting the project requires replacement with an eight-inch PVC main. That work is incorporated into project engineering and design and the impacts have been discussed as part of the project. The eight-inch manhole downstream from the project site in Pennsylvania Avenue is adequate to serve the project. Bioretention and underground detention structures are proposed to meet the City's low impact design (LID) requirements and integrated management practices (IMP) would be implemented to control peak runoff from the proposed development. Project reviewed by qualified City staff determined that the project would not exceed the capacity of the existing system. Impacts would be less than significant.

d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☐	☒	☐

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

Less Than Significant Impact. Adequate services are available to serve the project because the proposed project is consistent with the 1988 Community Plan, and would be served by existing water service from the City. The project would not require the expansion of water supply entitlements. Additionally, in compliance with the CAP, the project would utilize low-flow fixtures and appliances, diminishing project water demand. Project impacts would be less than significant.

e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐

Less Than Significant Impact. The City has determined that is has adequate wastewater treatment capacity to serve the project. Refer to XVII.a., above. Project impacts would be less than significant.

f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☒	☐

A Waste Management Plan prepared by KLR Planning for the project (May 2017), is included in Appendix H.

Less Than Significant Impact. Under that plan, debris and waste generated by demolition and construction would be managed under the City's Construction and Demolition (C&D) Debris Diversion Deposit Program. Additionally, long-term operations of the mixed-use project with commercial and multi-family development would also generate waste. This ordinance requires that the applicant post a deposit, which is not returned until the applicant demonstrates that a specified amount of the material generated by the work has been diverted from disposal in landfills. The project would be required to adhere to the City's waste generation reduction requirements. All solid waste from the operating facilities would be transported to an appropriate facility, which would have adequate capacity to accept the waste generated by the project. The commercial facilities on the project would be required to comply with the requirements of the City's Recycling Ordinance (SDMC Section 66.0701 et. seq), applicable to recycling by commercial facilities.

g) Comply with federal, state, and local statutes and regulation related to solid waste?	☐	☐	☒	☐

Less Than Significant Impact. Refer to XVII.f., above.

In 1989, the California Legislature passed Assembly Bill (AB) 939: Integrated Waste Management Act, which mandated that all cities reduce waste disposed in landfills from generators within their borders by 50 percent by the year 2000. AB 939 required all local governments to prepare a Source Reduction and Recycling Element, which incorporates waste management policies and programs to achieve the mandated waste reduction. Since 1990, the City has diverted more than 50 percent of its generated waste stream from disposal. This bill specified that solid waste should be considered by the equation GENERATED = DISPOSED + DIVERTED. "Diverted" materials are put into a *hierarchy* in the law, as follows:

- First *source reduction*, such as using a reusable bag, making double-sided copies, or other measure that stops waste at the source.

- Secondary measures include *recycling* and *composting*. Because these measures often have transportation and processing impacts, they are considered less preferable than source reduction.
- In the Public Resources Code, various methods of *transformation* for energy production are limited to ten percent of the total waste reduction target.

In 2008, SB 1016 was chaptered. Known as the Solid Waste Disposal Measurement Act, SB 1016 maintained the 50 percent diversion requirement, but changed to a disposal-based measurement system, expressed as the 50 percent Equivalent Per Capita Disposal Target. This built upon AB 939 by implementing a simplified and timelier indicator of jurisdiction performance that focuses on reported disposal at Board-permitted disposal facilities. This established a goal of not recycling more, but disposing of less. AB 341: Jobs and Recycling, chaptered in 2011, was intended to create green jobs by expanding recycling to every multi-family dwelling and business. It charged CalRecycle with responsibility for ensuring that the State is diverting at least 75 percent of solid waste that is generated within the State by 2020. SB 1016 establishes that compliance with State law is measured by reducing the amount of waste material requiring disposal, and AB 341 increases the diversion target to 75 percent.

Additional local regulation pertaining to solid waste management includes the City of San Diego's Municipal Code Ch.14 Art. 2 Div. 8: §142.0810, §142.0820, Ch. 6 Art. 6 Div. 7; §66.0706, §66.0709, §66.0710; and Ch. 6 Art. 6 Div. 6; §66.0711, §66.0604, §66.0606. These statues designate refuse and recycling space allocation requirements for:

- on-site refuse and recyclable material storage requirements,
- diversion of construction and demolition debris regulations, and
- diversion of recyclable materials generated from residential facilities, businesses, commercial/institutional facilities, apartments, condominiums, and special events requiring a City permit.

The City of San Diego 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. The proposed project exceeds this threshold and prepared a WMP is to identify measures that would be implemented to reduce this potential solid waste impacts such that significant impacts are avoided.

The City Recycling Ordinance is found in Municipal Code section 66.0701 et. seq. It requires the provision of recycling service for all single-family residences; and commercial facilities and multifamily residences with service for four cubic yards or more. In addition, the ordinance also requires development of educational materials to ensure occupants are informed about the City's ordinance and recycling services including information on types of recyclable materials accepted.

Construction and Demolition (C&D) Debris Diversion Deposit Program applies to all applicants for building, demolition, and removal permits. This ordinance requires that the applicant post a deposit that is not returned until the applicant demonstrates that a minimum amount of the material generated has been diverted from disposal in landfills. Mixed construction debris recycling facilities in San Diego are evaluated quarterly to determine how much of the throughput is recycled, and how much is a "residual" material requiring disposal. Facilities that accept mixed debris typically achieve a 68 percent or less diversion rate. Single materials recyclers, such as metal recyclers, often achieve a nearly 100 percent diversion rate. When comingled materials are sent to a mixed facility, the 75 percent diversion goal established by AB 341 will not be met. Depending on the project, to ensure that the overall diversion goal is attained, some materials must often be separated and trucked to facilities with higher diversion rates, such as aggregate and metal recyclers.

As concluded in the Waste Management Plan, the project proposes to divert 98 percent of demolition debris and 95 percent of construction debris. Additionally, the project would implement a target of 20 percent recyclable material. As such, project impacts would be less than significant.

XIX. MANDATORY FINDINGS OF SIGNIFICANCE –

a)	Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐

Less Than Significant With Mitigation Incorporated. The project proposes redevelopment of a previously developed site. The project site does not contain biological resources, and development of the project would not have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory. The project would have the potential to result in significant impacts to transportation/traffic, paleontological resources and noise. Mitigation measures have been incorporated to reduce impacts to less than significant.

b)	Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable futures projects)?	☐	☐	☒	☐

Less Than Significant Impact. The project may have the potential to result in significant impacts to paleontological resources and noise. However, impacts would be fully mitigated. Therefore, they would not result in a considerable cumulative impact. Other future projects within the surrounding area would be required to comply with applicable local, State, and Federal regulations to reduce potential impacts to less than significant, or to the extent possible. As such, the project is not anticipated to contribute to potentially significant cumulative environmental impacts. Project impacts would be less than significant.

c)	Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

Less Than Significant Impact. Construction and operation of the project would not cause environmental effects that would significantly directly or indirectly impact human beings. All impacts identified as being significant have been mitigated to below a level of significance. For this reason, all environmental effects fall below the thresholds established by the City of San Diego. Impacts would be less than significant.

INITIAL STUDY CHECKLIST
REFERENCES

I. Aesthetics / Neighborhood Character

X City of San Diego General Plan.
X Community Plans: Uptown Community Plan, 1988

II. Agricultural Resources & Forest Resources

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

III. Air Quality

___ California Clean Air Act Guidelines (Indirect Source Control Programs) 1990
X Regional Air Quality Strategies (RAQS) - APCD
X Site Specific Report:
Scientific Resources Associated, Air Quality Analysis, September 1, 2017

IV. Biology

X City of San Diego, Multiple Species Conservation Program (MSCP), Subarea Plan, 1997
X City of San Diego, MSCP, "Vegetation Communities with Sensitive Species and Vernal Pools" Maps, 1996
X City of San Diego, MSCP, "Multiple Habitat Planning Area" maps, 1997
___ Community Plan - Resource Element
___ California Department of Fish and Game, California Natural Diversity Database, "State and Federally-listed Endangered, Threatened, and Rare Plants of California," January 2001
___ California Department of Fish & Game, California Natural Diversity Database, "State and Federally-listed Endangered and Threatened Animals of California, "January 2001
___ City of San Diego Land Development Code Biology Guidelines
___ Site Specific Report:

V. Cultural Resources (includes Historical Resources)

X City of San Diego Historical Resources Guidelines
___ City of San Diego Archaeology Library
___ Historical Resources Board List
___ Community Historical Survey:
___ Site Specific Report:

VI. Geology/Soils

X City of San Diego Seismic Safety Study
___ U.S. Department of Agriculture Soil Survey - San Diego Area, California, Part I and II, December 1973 and Part III, 1975
X Site Specific Report:
Leighton and Associates, Geotechnical Investigation, June 27, 2016

VII. Greenhouse Gas Emissions

X Site Specific Report:
Climate Action Plan Consistency Checklist, June, 2017

VIII. Hazards and Hazardous Materials

X San Diego County Hazardous Materials Environmental Assessment Listing
___ San Diego County Hazardous Materials Management Division

_X_ FAA Self Certification Agreement
___ State Assessment and Mitigation, Unauthorized Release Listing, Public Use Authorized
_X_ Airport Land Use Compatibility Plan
___ Site Specific Report:

IX. Hydrology/Water Quality

___ Flood Insurance Rate Map (FIRM)
_X_ Federal Emergency Management Agency (FEMA), National Flood Insurance Program-Flood Boundary and Floodway Map
___ Clean Water Act Section 303(b) list, http://www.swrcb.ca.gov/tmdl/303d_lists.html
_X_ Site Specific Report:
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