

# North Park and Golden Hill Community Plan Updates Final Program Environmental Impact Report

## Golden Hill Errata

Project No. 380611  
SCH No. 2013121076

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For clarity, the September 2016 Final Program Environmental Impact Report (PEIR) includes ~~strikeout~~/underline to identify changes that were made to the document since the public review Draft PEIR dated May 31, 2016.

The City of San Diego has made additional corrections to the September 2016 Final PEIR that are described in these errata. These changes include minor corrections to the PEIR that are shown on the attached pages in double ~~strikeout~~/underline (~~strikeout~~/underline) format and are summarized below. These corrections do not result in any new physical effects.

Corrections:

- 1) Table S-1, Summary of Significant Environmental Impacts, was revised to clarify the impacts to historic resources resulting from the proposed Golden Hill CPU could occur *where an increase in density is proposed beyond the adopted Community Plan and current zoning*.
- 2) The Regulatory Framework chapter, Section 5.3.2.5 was corrected to refer to the City of San Diego instead of Carlsbad.
- 3) Figure 7.3-5 was updated to show the addition of the Cycle Track (in purple).
- 4) Impact 7.7-1 was revised to clarify that impacts to historic resources would occur where an increase in density is proposed beyond the adopted Community Plan and current zoning.
- 5) Section 7.7.4, Impact Analysis, was revised to clarify that the proposed Golden Hill CPU and associated discretionary actions would not increase residential development potential within the identified potential historic districts, and therefore the proposed amendments to the

Historical Resources Regulations (supplemental development regulations) are not required to mitigate potential impacts to potential historic districts.

- 6) Section 7.7.5, Significance of Impacts, was revised to clarify the impacts to historic and archaeological resources.
- 7) Section 7.7.7, Significance of Impacts after Mitigation, was revised to clarify that the proposed Golden Hill CPU would not result in impacts to potential historic districts because it would not result in an increase development potential within potential historic districts.
- 8) Section 12.1.2.a, Land Use, was revised to correct the wording of potential historic districts.
- 9) Sections 12.1.2, 12.2.2, and 12.3.2, Environmental Analysis were revised to clarify that the supplemental development regulations would be proposed as part of the North Park CPU and not the Golden Hill CPU.
- 10) The following responses to comments were revised to clarify that the proposed Golden Hill CPU and associated discretionary actions would not increase residential development potential within the identified potential historic districts, and therefore the amended Historical Resources Regulations are not required to mitigate potential impacts to potential historic districts:
  - a. Comment letter B8 (Save our Heritage Organisation), response to comments B8-2 and B8-4.
  - b. Comment Letter C17 (David Swarens), response to comments C17-17, C17-20, C17-22, and C17-23.

**Table S-1  
Summary of Significant Environmental Impacts**

Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
<b>Historical Resources</b>			
<p>Would implementation of the proposed Golden Hill CPU and associated discretionary actions result in an alteration, including the adverse physical or aesthetic effects and/or the destruction of a historic building (including an architecturally significant building), structure, object, or site?</p>	<p>Implementation of the proposed Golden Hill CPU and associated discretionary actions could result in an alteration of a historic building, structure, object, or site <u>where an increase in density is proposed beyond the adopted Community Plan and current zoning</u>. This impact would be potentially significant.</p>	<p><b>HIST 7.7-1 HISTORIC BUILDINGS, STRUCTURES, AND OBJECTS</b></p> <p>Prior to issuance of any permit for a development project implemented in accordance with the proposed North Park CPU that would directly or indirectly affect a building/structure in excess of 45 years of age, the City shall determine whether the affected building/structure is historically significant. The evaluation of historic architectural resources shall be based on criteria such as: age, location, context, association with an important person or event, uniqueness, or structural integrity, as indicated in the Guidelines.</p> <p>Preferred mitigation for historic buildings or structures shall be to avoid the resource through project redesign. If the resource cannot be entirely avoided, all prudent and feasible measures to minimize harm to the resource shall be taken. Depending upon project impacts, measures shall include, but are not limited to:</p> <p>Preparing a historic resource management plan;</p> <p>Adding new construction which is compatible in size, scale, materials, color and workmanship to the historic resource (such additions, whether portions of existing buildings or additions to historic districts, shall be clearly distinguishable from historic fabric);</p>	<p><b>Significant and Unavoidable</b></p>

### 5.3.2.5 SB 375 - Sustainable Communities and Climate Protection Act

SB 375 has four key components. First, SB 375 requires regional GHG emissions targets. CARB's Regional Targets Advisory Committee will guide the adoption of targets to be met by 2020 and 2035 for each Metropolitan Planning Organization (MPO) in the state. For the City of San Diego ~~Carlsbad~~, the MPO is San Diego Association of Governments (SANDAG; see below). These targets, which MPOs may propose themselves, will be updated every eight years in conjunction with the revision schedule for housing and transportation elements.

Second, MPOs will be required to create a Sustainable Communities Strategy (SCS) that provides a plan for meeting regional targets. The SCS and the Regional Transportation Plan (RTP) must be consistent with each other, including action items and financing decisions. If the SCS does not meet the regional target, the MPO must produce an alternative planning strategy that details an alternative plan to meet the target.

Third, SB 375 requires that regional housing elements and transportation plans (also prepared by SANDAG as the MPO for San Diego County) be synchronized on eight-year schedules. In addition, Regional Housing Needs Assessment allocation numbers must conform to the SCS. If local jurisdictions are required to rezone land as a result of changes in the housing element, rezoning must take place within three years.

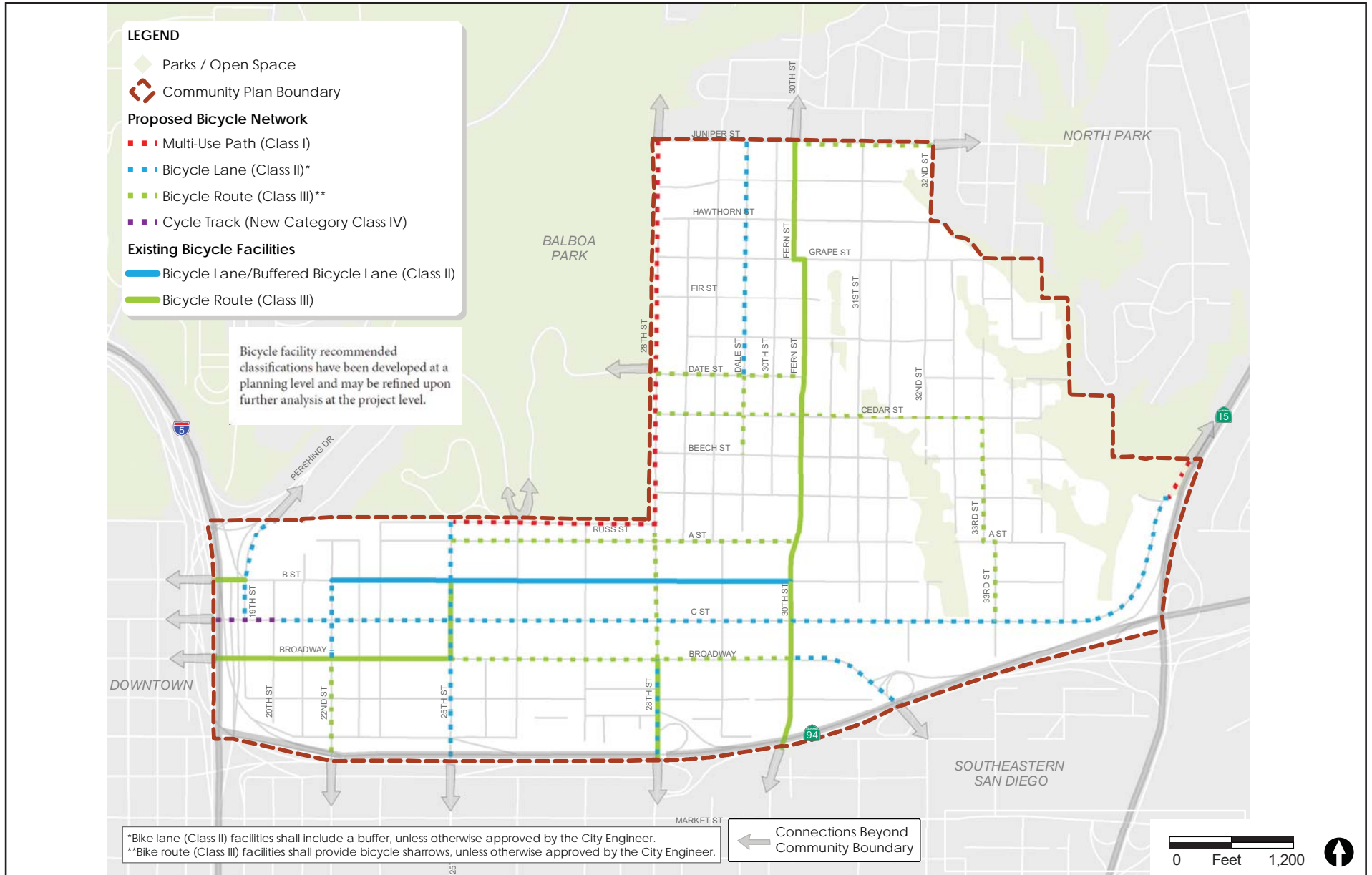
Finally, MPOs must use transportation and air emissions modeling techniques consistent with guidelines prepared by the CTC. Regional transportation planning agencies (such as SANDAG) are encouraged, but not required, to use travel demand models consistent with the CTC guidelines.

The SANDAG region was the first region in the state that adopted a SCS and RTP update under SB 375.

## 5.3.3 Local Regulations

### 5.3.3.1 San Diego Forward: The SANDAG Regional Transportation Plan

SANDAG is the regional authority that creates regional-specific documents to provide guidance to local agencies, as SANDAG does not have land use authority. San Diego Forward: The Regional Plan (RP) combines two of the region's existing planning documents: The Regional Comprehensive Plan (RCP) and the RTP and SCS. The RCP, adopted in 2004, laid out key principles for managing the region's growth while preserving natural resources and limiting urban sprawl. The RCP covered eight policy areas, including urban form, transportation, housing, healthy environment, economic prosperity, public facilities, our borders, and social equity. These policy areas were addressed in the 2050 RTP/SCS and are now fully integrated into the RP. ~~The Regional Comprehensive Plan (RCP) is the long-range planning document developed to address the region's housing, economic, transportation, environmental, and overall quality-of-life needs. The RCP establishes a planning framework and implementation actions that increase the region's sustainability and encourage~~



**FIGURE 7.3-5**  
 Existing and Planned Bicycle Networks – Golden Hill

Although the proposed Golden Hill CPU and associated discretionary actions does not propose specific development, future development and related construction activities facilitated by the proposed Golden Hill CPU and associated discretionary actions at the project level could result in the alteration of a historic building, structure, object, or site where allowed density would increase beyond the adopted Community Plan and current zoning. Direct impacts may include substantial alteration, relocation, or demolition of historic buildings, structures, objects, landscapes, sites and districts. Indirect impacts may include the introduction of visual, audible, or atmospheric effects that are out of character with a historic property or alter its setting, when the setting contributes to the resource's significance.

**Impact 7.7-1** Implementation of the proposed Golden Hill CPU and associated discretionary actions could result in the alteration of a historic building, structure, object, or site where an increase in density is proposed beyond the adopted Community Plan and current zoning.

~~Section 143.0212 of the SDMC also requires review of ministerial and discretionary permit applications for any parcel identified as sensitive on the Historical Resource Sensitivity Maps specifically to determine whether or not the project has the potential to adversely impact an archaeological resource which may be eligible for individual listing on the local register. In these cases, this review is supplemented with a project specific records search of the NAHC Sacred Lands File and California OHP CHRIS data by qualified staff, and as stated above, a site specific archaeological survey would be required. For any subsequent projects implemented in accordance with the proposed Golden Hill CPU where a recorded archaeological site or Tribal Cultural Resource (as defined in the Public Resources Code) is identified, the City would be required to initiate consultation with identified California Indian tribes pursuant to the provisions in Public Resources Code Section 21080.3.1 and 21080.3.2, in accordance with Assembly Bill 52. Results of the consultation process will determine the nature and extent of any additional archaeological evaluation or changes to the proposed project and appropriate mitigation measures for direct impacts that cannot be avoided.~~

SDMC Section 143.0212 requires review of ministerial and discretionary permit applications impacting parcels containing buildings 45 years old or older to determine whether or not the project has the potential to adversely impact a resource which may be eligible for individual listing on the local register. When it is determined that a resource may exist and the project proposed would constitute a significant impact to that resource, a site specific survey is required and may be forwarded to the Historical Resources Board to consider designation and listing of the property. If designated, a Site Development Permit with deviation findings and mitigation would be required for any substantial modification of the resource. If the property were not designated, modification of the property would not be subject to the Historical Resources Regulations. Potential individual resources and resources identified as part of the MPL, which are evaluated as single resources independent of other buildings, would be protected to a large extent through SDMC Section 143.0212. However, because this regulation limits the evaluation of historic resources to the project parcel and individual eligibility, resources identified as potentially contributing to a potential historic district would not be protect unless they were also eligible individually.

The proposed Golden Hill CPU contains a Historic Preservation Element that supports the Historic Preservation Element of the General Plan through goals and policies for identifying and preserving historical, archaeological and tribal cultural resources, and educating citizens about the benefits of, and incentives for, historic preservation. Additional policies supporting the identification and preservation of historical resources are also included in the Land Use, Urban Design, and Conservation Elements of the proposed Golden Hill CPU. Policies seek to preserve and enhance the historic character of the Golden Hill community and facilitate the identification, designation, and preservation of historically and culturally significant resources throughout the Golden Hill CPU area. Proposed policies also seek to preserve and rehabilitate historic and include measures to protect archaeological resources. Proposed policies would reduce direct impacts on historical and cultural resources by ensuring that such resources are identified and appropriately designated; encouraging preservation, rehabilitation, and adaptive reuse of historic structures instead of demolition or other significant alterations as part of future development; and protecting significant archaeological and tribal cultural resources.

The proposed Golden Hill CPU includes a policy that calls for the implementation of interim protection measures ~~to preserve the integrity and eligibility of potential historic districts until such time as they can be intensively surveyed, verified, and brought forward for historic designation consistent with City regulations and procedures, which are afforded very limited protection under existing regulations.~~ In response to this policy, amendments to the Historical Resources Regulations are proposed to provide supplemental development regulations to address how and where modifications can be made on residential properties identified as potentially contributing to specified potential historic districts. Development that does not comply with the supplemental development regulations would be subject to a Neighborhood Development Permit with deviation findings and mitigation. These regulations are not required to reduce impacts associated with implementation of the proposed Golden Hill CPU and associated discretionary actions because the Golden Hill CPU and associated discretionary actions would not result in any increase in residential development potential in the identified potential historic districts. Changes to contributing resources within a potential historic district could occur in the existing condition and would not be affected by the proposed Golden Hill CPU and the other associated discretionary actions. Additionally, indirect impacts to the potential historical districts are not anticipated because land uses surrounding potential historic districts are not identified as contributing resources to the potential historical districts and development in these areas would be subject to existing General Plan and proposed Golden Hill CPU policies that address development sensitivity to surrounding character. ~~The amendments to the Historical Resources Regulations would be adopted concurrent with the proposed Golden Hill CPU.~~

While the Municipal Code does provide for the regulation and protection of designated and potential historical resources, and while amendment to the Historical Resources Regulations would be consistent with the policies of the Historic Preservation Element to provide interim additional protection of or specified potential historic districts, it is impossible to ensure the successful preservation of all historic built environment resources within the plan area. Thus, potential impacts to historic buildings, structures, objects, or sites could occur where implementation of the proposed Golden Hill CPU and associated discretionary actions would result in increased development potential. Therefore, where increases in density beyond the adopted Community Plan and zoning

are proposed, potential impacts to historic buildings, structures, objects, or sites specified potential historic districts are would be considered significant and unavoidable.

## Issue 2 Prehistoric Resources, Sacred Sites, and Human Remains

*Would implementation of the proposed Golden Hill CPU and associated discretionary actions result in a substantial adverse change in the significance of a prehistoric archaeological resource, a religious or sacred use site, or disturbance of any human remains, including those interred outside of formal cemeteries?*

Although the proposed Golden Hill CPU and associated discretionary actions do not propose specific development at this time, future development and related construction activities facilitated by the proposed Golden Hill CPU and associated discretionary actions at the project level could result in the alteration or disturbance of prehistoric archaeological resources, tribal cultural resources, existing religious or sacred lands; or human remains. Grading, excavation, and other ground-disturbing activities associated with future development could affect important (as determined per the Historical Resources Guidelines) archaeological sites or traditional cultural properties that would constitute a significant direct impact.

The City has developed Historic Resource Sensitivity Maps that provide general locations of where historical resources are known to occur or have the potential to occur. These maps were developed in coordination with technical experts and tribal representatives. Upon submittal of ministerial and/or discretionary permit applications, a parcel is reviewed against the Historical Resource Sensitivity Maps specifically to determine whether or not the project has the potential to adversely impact an archaeological resource which may be eligible for individual listing on the local register (SDMC Section 143.0212).

~~The City's Historical Resources Regulations (Section 143.0212 of the SDMC) requires review of ministerial and discretionary permit applications for any parcel identified as sensitive on the Historical Resource Sensitivity Maps specifically to determine whether or not the project has the potential to adversely impact an archaeological resource.~~ This review is supplemented with a project specific records search of the NAHC Sacred Lands File and California OHP CHRIS data by qualified staff. Additionally, a site specific archaeological survey would be required in accordance with Municipal Code requirements. For any subsequent projects implemented in accordance with the proposed Golden Hill CPU and associated discretionary actions where a recorded archaeological site or Tribal Cultural Resource (as defined in the Public Resources Code) is identified, the City would be required to initiate consultation with identified California Indian tribes pursuant to the provisions in Public Resources Code Section 21080.3.1 and 21080.3.2, in accordance with Assembly Bill 52. Results of the consultation process would determine the nature and extent of any additional archaeological evaluation or changes to the proposed project and appropriate mitigation measures for direct impacts that cannot be avoided.

Avoiding impacts on religious or sacred places or human remains may be unavoidable in certain circumstances when resources are discovered during construction. Although there are no known religious or sacred uses within the Golden Hill CPU area, there is potential for these to be encountered during future construction activities associated with implementation of the proposed Golden Hill CPU and associated discretionary actions. The Prehistoric Cultural Resources Study



the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the Coroner has made the necessary findings as to origin and disposition pursuant to Public Resources Code 5097.98. However, the potential for encountering human remains during construction activities remains a possibility. Therefore, significant impacts on religious or sacred use sites or human remains may occur as a result of future development implemented in accordance with the proposed Golden Hill CPU and associated discretionary actions.

The proposed Golden Hill CPU is designed to support the historic preservation goals of the City's General Plan, and contains policies requiring protection and preservation of significant archaeological resources in the Historic Preservation Element of the proposed Golden Hill CPU. Native American consultation early in the project review process is also included in the CPU to identify tribal cultural resources and to develop adequate treatment and mitigation for significant archaeological sites with cultural and religious significance to the Native American community in accordance with all applicable local, state and federal regulations and guidelines.

While existing regulations, the Municipal Code, and proposed Golden Hill CPU policies would provide for the regulation and protection of archaeological resources and human remains, it is impossible to ensure the successful preservation of all archaeological resources within the Golden Hill CPU area. Therefore, potential impacts to archaeological resources are considered significant.

**Impact 6.7-2** Implementation of the proposed Golden Hill CPU and associated discretionary actions could adversely impact a prehistoric archaeological resource including religious or sacred use sites and human remains.

### 7.7.5 Significance of Impacts

Implementation of the proposed Golden Hill CPU and associated discretionary actions could result in an alteration to a historic building, structure, object, or site where an increase in density is proposed beyond the adopted Community Plan and current zoning (Impact 7.7-1) and could adversely impact ~~existing a prehistoric archaeological and tribal cultural resources including religious or sacred use sites or and~~ human remains, including those interred outside of formal cemeteries (Impact 7.7-1). These impacts are potentially significant.

### 7.7.6 Mitigation Framework

The City of San Diego's General Plan, combined with federal, state, and local regulations, provide a regulatory framework for project-level historical resources evaluation/analysis criteria, and when applicable, mitigation measures for future discretionary projects. All development projects with the potential to affect historical resources—such as designated historical resources; historical buildings, districts, landscapes, objects, and structures; important archaeological sites; and traditional cultural properties—are subject to site-specific review in accordance with the City's Historical Resources Regulations and Historical Resources Guidelines, through the subsequent project review process. The following mitigation measures (MM-HIST-1 and MM-HIST-2) provide a framework that would be required of future development projects with the potential to impact significant historical resources.

related artifacts that cannot be avoided or are inadvertently discovered is governed by state (i.e., Assembly Bill 2641 [Coto] and California Native American Graves Protection and Repatriation Act of 2001 [Health and Safety Code 8010-8011]) and federal (i.e., Native American Graves Protection and Repatriation Act [U.S.C. 30014-3013]) law, and must be treated in a dignified and culturally appropriate manner with respect for the deceased individual(s) and their descendants. Any human bones and associated grave goods of Native American origin shall be turned over to the appropriate Native American group for repatriation.

Arrangements for long-term curation of all recovered artifacts must be established between the applicant/property owner and the consultant prior to the initiation of the field reconnaissance. When tribal cultural resources are present, or non-burial-related artifacts associated with tribal cultural resources area suspected to be recovered, the treatment and disposition of such resources will be determined during the tribal consultation process. This information must then be included in the archaeological survey, testing, and/or data recovery report submitted to the City for review and approval. Curation must be accomplished in accordance with the California State Historic Resources Commission's Guidelines for the Curation of Archaeological Collection (dated May 7, 1993) and, if federal funding is involved, Title 36 of the Code of Federal Regulations, Part 79 of the Federal Register. Additional information regarding curation is provided in Section II of the Guidelines.

## 7.7.7 Significance of Impacts after Mitigation

### Issue 1 Historic Structures, Objects, or Sites

Future development implemented in accordance with the proposed Golden Hill CPU and associated discretionary actions that would potentially result in impacts to significant historical resources would be required to incorporate feasible mitigation measures adopted in conjunction with certification of this PEIR as detailed in the mitigation framework MM-HIST-1. The proposed mitigation framework combined with the proposed Golden Hill CPU policies promoting the identification and preservation of historical resources in the Golden Hill CPU areas reduces the program-level impact related; to historic resources of the built environment but not to below a level of significance. Therefore, because the degree of future impacts and applicability, feasibility, and success of future mitigation measures cannot be adequately known for each specific future project at this time, the impact on historic resources of the built environment remains significant and unavoidable.

With respect to potential historic districts, while amendments to the Historical Resources Regulations to include supplemental development regulations are proposed, until such time as they are intensively surveyed, verified and brought forward for designation consistent with City regulations and procedures, potential impacts to the specified Potential Historic Districts could occur. However, impacts to the potential historic districts would not be a result of implementation of the Golden Hill CPU and associated discretionary actions since no additional development potential is proposed in these areas. However, where development potential would increase compared to the adopted Community Plan and current zoning, impacts to historic resources including historic structures, objects or sites would remain significant and unavoidable.

Land Use	Acres	Dwelling Units	Floor Area
Education	9	-	100,660
Institutional	7	-	112,380
Multi-Family	<del>189</del> 188	7,120	-
Office Commercial	2	-	37,160
Open Space	57	-	-
Retail Commercial	<del>25</del> 23	-	356,800
Roads	281	-	-
Single-Family	<del>176</del> 179	2,095	-
<b>Grand Totals</b>	<b>746</b>	<b>9,215</b>	<b>607,000</b>
<b>Estimated Future Population</b>	<b>24,010</b>		

## 12.1.2 Environmental Analysis

### a. Land Use

The No Project Alternative would retain the adopted Community Plan. Land use impacts under this alternative would be similar to or greater than the anticipated impacts to the proposed Golden Hill CPU because the adopted Community Plan does not contain the proposed Golden Hill CPU policies and land use changes intended to improve compatibility with and implement the San Diego General Plan. While it would not conflict with adopted land use plans, policies, or ordinances, and would thus have a less than significant impact, it would not implement the City of Villages Strategy of the General Plan or the environmental goals, objectives, and guidelines of the General Plan's various elements to the same degree as the proposed Golden Hill CPU.

The adopted Community Plan's open space boundary was not precisely mapped and portions of the MHPA are mapped over existing residential. Thus, this alternative does not support the MSCP Subarea Plan to the same degree as the proposed Golden Hill CPU, which includes MHPA boundary corrections that remove areas designated as residential and adds open space areas, not in the MHPA now into the MHPA. The corrections proposed as part of the proposed North Park CPU would also add open space areas, which are not currently included, into the MHPA; and this would not occur under the No Project Alternative.

The adopted Community Plan would not include all of the proposed Golden Hill CPU policies supporting the Historical Resource protections. Though new development occurring under the No Project Alternative would be required to comply with the City's Land Development Code, this alternative would not benefit from the identification of potential historic districts and associated policies that support protections for potential historic districts ~~supplemental development regulations to create additional safeguards for specified historic preservation districts~~ that are included with the proposed Golden Hill CPU and associated discretionary actions.

impacts associated with GHG emissions for the No Project Alternative would be greater than the impacts of the proposed Golden Hill CPU.

## f. Noise

The No Project Alternative would retain the adopted Golden Hill Community Plan. Noise impacts under this alternative would be similar to the anticipated impacts under the proposed Golden Hill CPU because like the proposed Golden Hill CPU development under the adopted Golden Hill Community Plan could impact sensitive noise receptors. While the No Project Alternative does not contain the proposed Golden Hill CPU policy changes intended to improve compatibility with and implement the San Diego General Plan that could mitigate some impacts, both the No Project Alternative and the proposed Golden Hill CPU would follow City noise regulations as well as state regulations such as the Code of Regulations Title 24. However, the resulting noise impacts for both the No Project Alternative and the proposed Golden Hill CPU would remain significant and unavoidable.

## g. Historical Resources

~~The No Project Alternative would retain the adopted Golden Hill Community Plan with no additional discretionary actions, including the supplemental development regulations for potential historic districts. Included with the proposed Golden Hill CPU discretionary actions is an amendment to the Historical Resources Regulations to include supplemental development regulations to assist in the preservation of specified potential historic districts until they can be intensively surveyed and brought forward for designation. These supplemental development regulations would limit how and where modifications can be made on residential properties identified as potentially contributing to specified potential historic districts.~~

As with the proposed Golden Hill CPU, future development under the No Project Alternative has the potential to result in significant direct and/or indirect impacts to historical and archaeological resources. Implementation of future projects under this alternative would require adherence to all applicable guidelines further described in Section 7.7, Historical Resources. However, the No Project Alternative would not benefit from the protections that would be implemented under the proposed Golden Hill CPU mitigation framework and would not identify the potential historic districts and associated policies supporting protection of potential historical resources. Thus, potential impacts to historical resources under the no project alternative would be slightly greater than under the proposed Golden Hill CPU and associated discretionary actions. The extent of impacts to archaeological resources resulting from implementation of the No Project Alternative would be similar to those identified for the proposed Golden Hill CPU, because the extent and areas of disturbance by development, implementation of the No Project Alternative would result in potentially significant impacts related to archaeological resources at the program level, similar to the proposed Golden Hill CPU.

## h. Biological Resources

Under the No Project Alternative the boundary corrections proposed in the proposed Golden Hill CPU would have to go forward as a separate action and until this action was completed it is likely

## e. Greenhouse Gases

The Higher-Density Alternative would increase density compared to the proposed Golden Hill CPU because it adds approximately 120 additional units. Increasing residential and commercial density in transit corridors and Community Villages within a TPA would support the City of San Diego in achieving the GHG emissions reduction targets of the CAP, and thus, impacts associated with GHG emissions from the Higher-Density Alternative would be similar to the proposed project.

## f. Noise

The Higher-Density Alternative would result in increased densities along certain commercial corridors. Noise impacts under this alternative would be similar to the anticipated impacts to the proposed Golden Hill CPU because like the proposed Golden Hill CPU the Higher-Density Alternative would permit development that could impact sensitive noise receptors. Both the Higher-Density Alternative and the proposed Golden Hill CPU would follow City noise regulations as well as state regulations such as the Code of Regulations Title 24; however, the increase in development could expose sensitive receptors to increase noise levels. Therefore, resulting noise impacts for the Higher-Density Alternative would be the same as the proposed Golden Hill CPU.

## g. Historical Resources

The Higher-Density Alternative would retain the identification of potential historic districts and associated policies supporting protections for potential historic districts. ~~proposed implementation of interim protection measures to preserve the integrity and eligibility of potential historic districts.~~ As with the proposed Golden Hill CPU, this alternative would amend the Historical Resources Regulations to include supplemental development regulations to assist in the preservation of ~~specified potential historic districts until they can be intensively surveyed and brought forward for designation.~~ If approved, the supplemental development regulations proposed as part of the North Park CPU and associated discretionary actions would limit how and where modifications can be made on residential properties identified as potentially contributing to specified potential historic districts.

Therefore, this Alternative is consistent with the policies of the proposed Golden Hill CPU Historic Preservation Element to provide additional protection for potential historic districts, but like the proposed Golden Hill CPU it is impossible to ensure the successful preservation of all historical resources within the Golden Hill CPU area. Therefore, potential impacts to the historical resources from implementation of the Higher-Density Alternative remain significant and unavoidable like the proposed Golden Hill CPU.

As with the proposed Golden Hill CPU, future development under the Higher-Density Alternative has the potential to result in significant direct and/or indirect impacts to archaeological resources. Implementation of future projects under this alternative would require adherence to all applicable guidelines further described in Section 7.7, Historical Resources. The extent of impacts to archaeological resources resulting from implementation of the Higher-Density Alternative would be similar to those identified for the proposed Golden Hill CPU, because the extent and areas of disturbance by development would be generally the same and only the land use designation would

## e. Greenhouse Gases

The Lower-Density Alternative would decrease GHG emissions over those of the proposed Golden Hill CPU, as there would be approximately 158 fewer units when compared to the proposed Golden Hill CPU. The decrease in density in areas where residents would have convenient access to transit and commercial services would result in a potential conflict with the implementation of CAP Strategies and the General Plan's City of Villages Strategy. Decreasing residential and commercial density in transit corridors and Community Villages within a TPA would not support the City of San Diego in achieving the GHG emissions reduction targets of the CAP and thus, impacts associated with GHG emissions would be greater than the proposed Golden Hill CPU.

## f. Noise

The Lower-Density Alternative would result in decreased densities along certain commercial corridors. Noise impacts under this Alternative would be similar to the anticipated impacts to the proposed Golden Hill CPU because, like the proposed Golden Hill CPU, development under the Lower-Density Alternative would impact sensitive noise receptors. Both the Lower-Density Alternative and the proposed Golden Hill CPU would follow City noise regulations as well as state regulations such as the Code of Regulations Title 24. The resulting noise impacts for both the Lower-Density Alternative and the proposed Golden Hill CPU would remain significant and unavoidable.

## g. Historical Resources

The Lower-Density Alternative would permit less development and would retain the identification of potential historic districts and associated policies supporting protections for potential historic districts. ~~proposed implementation of interim protection measures to preserve the integrity and eligibility of potential historic districts. Like the proposed Golden Hill CPU, the Lower Density Alternative would amend the Historical Resources Regulations to include supplemental development regulations to assist in the preservation of specified potential historic districts until they can be intensively surveyed and brought forward for designation. The~~ If approved as part of the North Park CPU, the supplemental development regulations would limit how and where modifications can be made on residential properties identified as potentially contributing to specified potential historic districts. While the Lower-Density Alternative could result in a reduced the number of proposed projects that would modify historical resources, like the proposed Golden Hill CPU it is impossible to ensure the successful preservation of all historical resources within the plan area. Therefore, potential impacts to the historical resources from implementation of the Lower-Density Alternative would remain significant and unavoidable like the proposed Golden Hill CPU.

As with the proposed Golden Hill CPU, future development under the Lower-Density Alternative has the potential to result in significant direct and/or indirect impacts to archaeological resources. Implementation of future projects under this Alternative would require adherence to all applicable local regulations and guidelines further described in Section 7.7, Historical Resources. The extent of impacts to archaeological resources resulting from implementation of the Lower-Density Alternative would be similar to those identified for the proposed Golden Hill CPU, because the extent and areas of disturbance by development would be generally the same and only the land use designation

Letter B8

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July 28, 2016

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 Senior Environmental Planner  
 City of San Diego Planning Department  
 Via email: [PlanningCEQA@sandiego.gov](mailto:PlanningCEQA@sandiego.gov)

PROJECT NAME: North Park and Golden Hill Community Plan Updates  
 PROJECT No. 380611

PROJECT NAME: Uptown Community Plan Update  
 PROJECT No. 21002568

Dear Mr. Steinert:

B8-1

On behalf of Save Our Heritage Organisation (SOHO), these comments address the draft environmental impact reports (EIRs) for the pending updates to the community plans for Golden Hill, North Park, and Uptown. SOHO's overarching concern is that the updates neither identify nor adequately analyze enforceable mitigation for significant impacts to historic resources.

Please respond to each of the following comments:

B8-2

1. CEQA requires that EIRs for projects or plans with potentially significant direct or indirect environmental impacts, including impacts on historic resources, identify and analyze feasible mitigation measures and a range of reasonable alternatives. SOHO contends that to prevent impacts to historic resources that may occur with development that will occur following the community plan updates, identified potential historic districts should be concurrently implemented for all three planning areas. Please revise the EIRs to provide for this feasible mitigation for plan impacts to historic resources or explain why not.

B8-1 Comment noted. The City appreciates the Save Our Heritage Organisation's (SOHO's) participation in the public review comment process. The comment letter will become public record as part of the Final PEIR. All comments will be considered during the decision-making process.

B8-2 The PEIR incorporates all feasible mitigation measures available to reduce the significance of potential impacts to historical resources. ~~The~~ Additionally, the project includes amendments to the Historical Resources Regulations to include supplemental development regulations to assist in the preservation of specified Potential Historic Districts until they can be intensively surveyed and brought forward for designation. However, the proposed CPUs would not result in any increase in residential development potential in the identified potential historic districts, meaning any changes to contributing residential resources within a potential historic district under the proposed CPUs could also occur under the adopted Community Plan. Increases in commercial density that would occur under the proposed CPUs could result in impacts to contributing commercial resources, but the proposed supplemental development regulations would not address commercial properties and thus, would not reduce the potential impact to contributing commercial properties within this potential historic district. As such, the supplemental development regulations are not required to reduce impacts associated with implementation of the proposed CPUs and associated discretionary actions, though they would provide additional protections. Additionally, the proposed Historic Preservation Elements (HPE) for both North Park and Golden Hill include policies to intensively survey and prepare nominations for the Potential Historic Districts (Golden Hill and North Park HPE Policy HP-2.2). Mitigation measures HIST 6.7-1 and HIST 7.7-1 are also proposed to reduce development impacts to historical resources. Nonetheless, the PEIR concludes that even with implementation of the mitigation framework, the degree of future impacts and applicability, feasibility, and success of future mitigation measures cannot be adequately known for each specific future project at a program level of analysis.

LETTER

RESPONSE

<p>EIR Comments July 28, 2016 Page 2</p> <p>B8-3 2. Please also revise the EIRs to identify and analyze the following mitigations to facilitate historic preservation and rehabilitation:</p> <p style="padding-left: 40px;">a. Exclude historic resources from calculations of floor area ratio, increasing density for projects that retain an historic resource;</p> <p style="padding-left: 40px;">b. Exclude historic resources from parking calculations, allowing reduced parking when a project retains an historic resource;</p> <p style="padding-left: 40px;">c. Include city-wide transferable development rights (TDRs), enabling property owners to buy and sell rights to encourage projects near transit and amenities.</p> <p>B8-4 3. The EIRs state that plan impacts to historic resources are “significant and unavoidable.” Supplemental development regulations proposed to mitigate impacts to potential historic districts require additional implementation measures to be ineffective:</p> <p style="padding-left: 40px;">a. Will the EIRs be revised to impose timelines for implementation of the regulations, establishing priorities for potential historic districts? If not, why not?</p> <p>B8-5 b. Will the EIRs be revised to consider feasible funding for the regulations? If not, won’t the mitigation be unenforceable?</p> <p>B8-6 c. Will the EIRs be revised to consider amendments to the supplemental development regulations so that they comprehensively apply to all resources within identified potential historic districts? If not, why not?</p> <p>B8-7 d. Will the EIRs be revised to apply regulatory protections to community-identified potential historic districts that the City agrees are eligible, the Multiple Property Listings (MPLs), and the commercial properties located within potential districts? If not, why not?</p>	<p>B8-3 Mitigation measures HIST 6.7-1 and HIST 7.7-1 call for avoidance, which is preferred, or site-specific mitigation of historic resources impacts for any development implemented in accordance with the proposed CPUs. The proposed CPUs provide adequate flexibility and incentive for preservation of historic resources. In addition, the Municipal Code currently provides incentive opportunities, including Conditional Use Permits to facilitate adaptive reuse and Planned Development Permits to allow for deviations from development standards to achieve a better project, such as one that preserves and incorporates a designated historic resource. Inclusion of the recommended measures is not needed to further reduce significant historical resources impacts. Even if those measures were added, the degree of future impacts and applicability, feasibility, and success of future mitigation measures would not be known for each specific future project at a program level of analysis and impacts would remain significant and unavoidable.</p> <p>B8-4 The proposed supplemental development regulations are not proposed as a mitigation measure, rather they are part of the project. Implementation of the supplemental development regulations would occur concurrent with approval of the CPUs. Thus, the protections for Potential Historic Districts would be in place immediately with adoption of the CPUs and a timeline for implementation of the regulations is not needed. <u>Additionally, as previously stated, the regulations are not required to reduce impacts associated with implementation of the proposed CPUs and associated discretionary actions because the project would not result in any increase in residential development potential in the identified potential historic districts. Because impacts to historical resources could occur wherever an increase in density is proposed beyond the adopted Community Plans, mitigation measures HIST 6.7-1 and HIST 7.7-1 are proposed to avoid or mitigate these impacts.</u> Significant and unavoidable impacts are identified even after implementation of <del>the</del> <u>this</u> mitigation framework because the degree of future impacts and applicability, feasibility, and success of future mitigation measures cannot be adequately known for each specific future project at a program level of analysis. Mitigation measures HIST 6.7-1 and HIST 7.7-1 and CPU policies protecting historic resources will be implemented to avoid or reduce impacts resulting from development to the greatest extent feasible. Policies included in the proposed CPUs would be implemented at the time of CPU adoption.</p> <p>B8-5 As stated in response B8-4 above, the supplemental development regulations (amendments to the Historical Resources Regulations) will be implemented concurrent with the adoption of CPUs. Refer to Section 3.4.2.2</p>
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	<p>C17-17 (cont.)</p> <p>of future development projects with the potential to impact significant historical resources.</p> <p><u>The proposed CPUs would not result in any increase in residential development potential in the identified potential historic districts and any changes to contributing residential resources within a potential historic district under the proposed CPUs could also occur under the adopted Community Plans. However,</u> <del>t</del>The proposed supplemental development regulations would provide protection for the proposed South Park and Culverwell and Taggart’s Addition potential historic districts by protecting contributing resources from alteration that could affect the district’s potential eligibility. It is correct that commercial areas would not be subject to the proposed supplemental development regulations; however, the existing Historical Resources Regulations would apply to potentially historic commercial properties. The potential threat to the integrity of potential historic districts is addressed within the Draft PEIR in Section 7.7.4. <del>In addition to the proposed supplemental development regulations that would provide protections for Potential Historic Districts,</del> <del>a</del>A mitigation framework for protecting historic buildings, structures and objects is provided in Section 7.7.6 of the Draft PEIR. Nonetheless, the analysis concludes that because the degree of future impacts and applicability, feasibility, and success of future mitigation measures cannot be adequately known for each specific future project at this time, the impact on historic resources of the built environment would remain significant and unavoidable.</p> <p>C17-18 Neighborhood character impacts for the Golden Hill community are addressed in Section 7.2.3, Issue 2 of the Draft PEIR. The analysis specifically addresses the repeal of the Golden Hill Planned district Ordinance and the rezone of parcels using existing citywide zoning. As discussed in that section, citywide zones would apply similar development controls to those currently in place under the Golden Hill Planned District Ordinance. These include land use typologies (e.g., neighborhood commercial, multi-family residential etc.), residential density and major components of the building envelope such as floor area ratios, heights, and setbacks. Additionally, the proposed Golden Hill CPU provides design guidelines in the Urban Design Element that would guide development during discretionary review to ensure neighborhood character is maintained and enhanced.</p>
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<p>C17-19 In spite of some very strong language in various sections as goals or policies (e.g. LU-25 LU.2.7 and UD-63 UD-2.6, et al) the plan update creates or maintains approaches which may have significant and unavoidable negative, and unmitigated, impacts on the character and quality of our neighborhoods of the Greater Golden Hill community.</p> <p>C17-20 In the “last” round of CPUs in the 1980’s, an interim protective measure, in the form of an emergency ordinance was adopted during the plan update process in the Southeastern community, for the Sherman Heights Historic District. And that district, which was an element of the CPU, was brought on line essentially concurrently with the Community Plan adoption, to minimize adverse impacts and to implement the plan.</p> <p>Such an approach would still be the most effective way to minimize adverse impacts and mitigate the adoption of the CPU.</p> <p>A strict timetable and concurrent adoption of historic districts, with a program with community participation and direction, would go a long way to meet the needs of the community, and minimize adverse impacts of the CPU.</p> <p>The proposed South Park Historic District has been in play now for twenty years, since the 1996 mid city survey, and the credibility of any “interim” period has been stretched pretty thin.</p>	<p>C17-19 Comment noted. This comment makes a general statement about the significant impacts that will result from proposed Golden Hill CPU policies; however, it does not provide any reasoning as to why those significant impacts would occur. The referenced policies are all supportive of protecting the character of the community.</p> <p>C17-20 This comment is suggesting that a Historic District should be implemented concurrently with adoption of the CPU. However, at this time, adequate surveys have not been completed to allow the Potential Historic Districts to be adopted as Historic Districts. <u>Thus, As part of the North Park CPU project,</u> the City has proposed identification of Potential Historic Districts that would be protected by <u>the proposed</u> amendments to the Historical Resources Regulations that would provide supplemental development regulations protecting modifications of potentially contributing resources in order to maintain the integrity of the Potential Historic District until such a time that it can be intensively surveyed, verified, and brought forward for designation consistent with City regulations and procedures. <u>Note that the proposed supplemental regulations are not required to mitigate impacts to potential historic districts as the proposed CPUs and associated discretionary actions would not increase residential development potential in any potential historic district compared to the adopted Community Plans, with the exception of the 30<sup>th</sup> Street Commercial potential historic district.</u></p>
<p>C17-21 Concurrent adoption of the proposed Historic Districts, “Culverwell &amp; Taggart’s Addition” and “South Park” was the unanimous recommendation of the Greater Golden Hill Community Planning Committee, the community planning group for the Golden Hill area.</p>	<p>C17-21 Comment noted. The City acknowledges the stated recommendation and support for the Culverwell &amp; Taggart’s Addition and South Park Historic Districts.</p>
<p>C17-22 Project alternatives.12.2.2 (g)</p> <p>Review of the impact of the “higher density alternative” impact on historic/cultural resources is inadequate (12-13). Reliance on the proposed “interim protection” measures under the “preferred project” is questionable at best and, as acknowledged, potential impacts would be significant and unavoidable. This option would intensify those threats, and the analysis should reflect this, rather than suggesting a similar adverse impact for this alternative. Please correct.</p>	<p>C17-22 <u>This comment makes reference to the Higher-Density Alternative for Golden Hill.</u> The City does not agree that the analysis is inadequate. Under both the proposed <del>project Golden Hill CPU</del> and the Higher Density Alternative, impacts to Potential Historic Districts would be protected by <u>mitigation measure HIST 7.7-1.</u> <del>implementation of amendments to the Historical Resources Regulations that would provide supplemental development regulations for contributing resources within the Potential Historic District.</del> The analysis of the Higher Density Alternative already concludes that the impact would be significant and unavoidable, similar to the proposed project. Proposed policies (e.g., LU-2.4 through LU-2.7), and existing development regulations would ensure development, including higher density development, is designed to be consistent with community character. Thus, no change is required to the Draft PEIR.</p>
<p>C17-23 Both the analysis in that section, and in discussion of the “lower density” alternative (12.3.2 (g)) describe adverse impacts to historic resources, but fail to discuss impacts to identified historic districts by the loss of “contributors.” This discussion does appear, somewhat, in the discussion of the preferred project alternative, but is lacking in review of these alternatives.</p> <p>These sections should be corrected to include a discussion of this impact on historic districts, as well as on the goals of the community plan update of preserving historic resources and community character.</p> <p>Yours, David Swarens.</p>	

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	<p>C17-23    The focus of the alternatives analysis is on how the alternative would reduce potentially significant impacts of the project. Thus, where an impact would be greater or lesser than the project, this is described. Under both the Higher Density and Lower Density Alternatives, the <u>identification of Potential Historic Districts and associated CPU policies that call for development of</u> supplemental development regulations would be retained. <u>However, under all of these Alternatives and the proposed project, significant impacts to potential historic districts would not occur because an increase in development potential would not occur in these areas. Thus, the impact associated with the loss of contributing resources would be similar to the project because these resources would be subject to the same protections through the amendments to the Historic Resources Regulations.</u> Similarly, the goals of the CPU for preserving historic resources and community character for these two alternatives would be the same as the project as described in the descriptions to the alternatives (Sections 12.2.1 and 12.3.1). No changes to the Draft PEIR are warranted.</p>
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