



Land Development
Review Division
(619) 446-5460

ADDENDUM to an ENVIRONMENTAL IMPACT REPORT

Project No. 90947
Addendum to *The City of Villages Growth
Strategy - Strategic Framework Element*
EIR No. 40-1027
SCH No. 2001061069

SUBJECT: HOUSING ELEMENT UPDATE, FISCAL YEARS 2005-2010: The Housing Element Update for Fiscal Years 2005-2010 is intended to identify and analyze the City's housing needs, establish reasonable goals, objectives and policies based on those needs, and provide a comprehensive five-year program of actions to achieve the identified goals and objectives. As required by State law, it includes standards and plans for the improvement of housing, the provision of adequate sites for housing, and the adequate provision of the housing needs of all segments of the City within the specified five-year cycle as required by State law.

Applicant: City of San Diego

I. PROJECT DESCRIPTION

Background:

The Housing Element is one of the seven elements of the City of San Diego's Progress Guide and General Plan (General Plan) mandated by State law and must be updated every five years. State law also requires that the Housing Element be consistent with other elements of the General Plan. Therefore, the proposed Housing Element update has been prepared to be consistent with and help implement the goals of the Strategic Framework Element of the General Plan adopted October 2002. Subsequent consistency between the Housing Element and the General Plan would be achieved by evaluating each proposed community plan and General Plan amendment for impacts on the Housing Element which would culminate in an annual report summarizing the cumulative impacts of these amendments on the Housing Element.

State law also requires that regional councils of government determine "regional share goals" for each local jurisdiction. These goals are the projected share of regional housing needs for all income groups for the next five-year housing element cycle. San Diego's regional share goal for the 7.5-year period from January 1, 2003 - June 30, 2010 has been determined by SANDAG to be 45,741 housing units for very low-income, low-income, moderate income, and above moderate income categories. This goal does not require the housing units affordable in each income category be provided but does require that San Diego have sufficient vacant and potentially redevelopable land zoned for residential use in various density categories to potentially meet the housing goals for each income group. An inventory of potential sites was conducted in the Spring of 2005, and it was determined that San Diego has sufficient land available to accommodate San Diego's regional share requirement.

The State Housing Element law requires that the City determine the "Maximum Feasible Units for New Construction, Rehabilitation, and Conservation" which it believes can be accomplished during this five-year Housing Element cycle for each income category. Table I shows the projected housing unit estimates which are based on the quantified objectives and program targets proposed in the body of the Housing Element, a comprehensive assessment of current economic and market conditions, and the resources anticipated to be available through the conclusion of this Housing Element cycle.

TABLE 1

Maximum Feasible Units for New Construction, Rehabilitation, and Conservation by Income Level			
Income Group	New Construction	Rehabilitation	Conservation
Extremely Low Income	0	550	0
Very Low Income	2,065	1,110	0
Low Income	1,915	450	500
Subtotal	3,980	2,110	500
Moderate Income	8,869	200	0
Above Moderate Income	19,057	0	0
Subtotal	27,926	200	0
Total	31,906	2,310	500

The Housing Element contains objectives, policies, and programs for each of the following main goals:

1. Provision of an Adequate Site Inventory and New Construction
2. Maintenance and Conservation (including preservation of existing low-income housing and rehabilitation)
3. Reduction of Governmental Constraints
4. Affordable Housing Opportunities
5. Administration (including fair share and community balance, use of redevelopment set-aside funds, reduction of housing discrimination and energy conservation)

Goal 1. Provision of an Adequate Site Inventory and New Construction

Ensure the provision of sufficient housing for all income groups to accommodate San Diego's anticipated share of regional growth during Fiscal Years 2005 - 2010.

Quantified Objective: Provision of an Adequate Site Inventory

The City would continue to maintain an inventory of both vacant and redevelopable land distributed throughout the City so that the City can achieve its 7.5-year regional share goal of 45,751 housing units, as allocated by SANDAG in the Regional Housing Needs Statement during the period January 1, 2003-June 30, 2010. The inventory shall not fall below the number of sites required to accommodate 75,000 single-family and multi-family housing units during this housing cycle. This objective is unchanged from the previous Housing Element, except for the changed regional share goal and the slightly reduced anticipated inventory at the end of the planning period. The latest City's site inventory projected that 119,000 additional housing units could be accommodated.

Quantified Objective: New Construction

Provide at least 935 additional units for moderate-income households, 1,915 additional units for low-income households, and approximately 2,065 additional units of housing for very low – income households during this housing cycle. This objective does not include new units constructed with the assistance of Low- and Moderate-Income Redevelopment **Set-Aside** Funds which are listed under a separate objective. While land costs have escalated dramatically since the previous Housing Element, due to increased resources in redevelopment areas, low and very low income housing construction goals are slightly increased from the previous Housing Element.

Goal 2. Maintenance and Conservation

Maintain at a high level and upgrade, where necessary, the quality, safety, and livability of San Diego's housing stock, with emphasis on preservation of San Diego's affordable housing stock.

Quantified Objective: Maintenance and Conservation

Develop and maintain programs that identify substandard housing and provide a wide spectrum of options to correct housing code violations. This objective has not changed from the previous housing element cycle.

Quantified Objective: Preservation of Existing Low-Income Housing

As required by Section 65583 of the California Government Code, local governments are required to include an analysis and programs for the preservation of assisted housing developments in their Housing elements. Given the level of local and federal financing anticipated to be available during the period from July 2005 - June 2010, the preservation objective during this period is 500 units or approximately ten percent of the total number of assisted units eligible to convert to market rate rents.

Quantified Objective: Rehabilitation

Rehabilitate at least 2,100 housing units during the five-year plan period with 1,200 units affordable to extremely low-income households, 600 units affordable to very low-income households, and 300 units affordable to low-income households at 65 percent of AMI (standard established under the HOME program). This objective does not include units rehabilitated with the assistance of Low- and Moderate-Income Redevelopment **Set-Aside** Funds. This objective was reduced by 800 units from the previous Housing Element. However, the proportion of units to be rehabilitated for extremely low-income and very low-income households has risen from 66 percent in the previous Element to 85 percent in the new Element.

Goal 3: Minimize governmental constraints in the development, improvement and maintenance of housing without compromising the quality of governmental review or the adequacy of consumer protection

Quantified Objective: Reduction of Governmental Constraints

Project Management procedures, including the Project Tracking System, shall be entirely operational during the 2005-2010 Housing Element cycle, take no more than ten working days to process 90 percent of ministerial permit applications for single-family units through the initial correction stage and take no more than 26 working days to process 90 percent of ministerial permit applications for multifamily units. The process time shall include the time from initial application to issuance of a correction notice. The previous Housing Element included an objective too make the Project Management System (previously named Process 2000) 80 percent operationally by January 2000. The program became fully operational in 2004. The ministerial permit processing objective has been slightly modified from the previous cycle. An added objective includes that all of the components of Project Management, including the New Project Tracking System shall remain operational during the next five years.

Goal 4: Provide affordable housing opportunities, both for low-income renters and low- to moderate income buyers

Quantified Objective: Affordability for Low-Income Renters

Provide assistance in the form of rental subsidies to at least 800 additional low-income households, of whom at least 90 percent should be low-income.

Quantified Objective: Affordable Homeownership Opportunities

Provide homebuyer education, counseling, and workshops to 500 low- and moderate-income households. Provide financial assistance to approximately 400 low- and 250 moderate-income families. Offer homeownership opportunities through land use incentive programs such as Inclusionary Housing and Density Bonus to an estimated 150 low- and moderate-income households.

The quantified objectives have been changed to reflect the resources anticipated to be available. Resources from the federal government have decreased significantly during the past few years. The objective pertaining to rental assistance remains at 800, the objectives for homeownership now include homeownership opportunities provided through land use incentive programs in addition to education and financial assistance. The homebuyer education objective has been reduced from 12,000 households assisted to 500 households assisted. The objective for financial assistance to first-time homebuyers has been reduced from 1,800 households to 650 (400 low-income and 250 moderate-income homebuyers) due to the high and rising cost of homes in San Diego.

Goal 5: Facilitate compliance with all applicable federal, state and local laws and regulations; promote achievement of balanced community goals; promote conservation of nonrenewable energy resources; and promote consistency with the remainder of the General Plan and other major city wide planning efforts.

Quantified Objective: Affordable Housing Goals and Community Balance

A minimum of ten percent of all new units built in communities throughout the City should be affordable to low- and very low-income residents or for moderate-income homebuyers. A minimum of 20 percent of all units built in those portions of the North City, where a 20 percent inclusionary housing requirement has been adopted, should be affordable to low- and very low-

income residents or for moderate-income homebuyers. This objective includes the new requirement that all housing developers either construct affordable housing on the site of market rate housing, in the same community planning area as the market rate housing, or pay an in-lieu fee. This is consistent with the Inclusionary Housing Policy (Adopted in 2002). A 20 percent inclusionary requirement was adopted for the North City area.

Quantified Objective: Use of Redevelopment Agency Low- and Moderate-Income Set-Aside Fund

Provide housing assistance to at least 3,000 very-low-, low- and moderate-income households during the next five years through new or rehabilitated housing units. This can be in the form of new or rehabilitated housing units or additional transitional shelter facilities. This objective is raised by 1,900 units from the previous housing cycle due to the anticipated redevelopment set-aside funds. Of the 3,000 units, 40 percent or 1,200 would be for very low-income households, 30 percent or 900 units would be for low-income households and 30 percent or 900 units would be for moderate-income households.

Quantified Objective: Reduction of Housing Discrimination

The City shall actively participate in an ongoing region-wide collaborative effort to improve fair housing choice and affirmatively further fair housing. The objective of this effort is to reduce impediments to addressing and eliminating discrimination identified in the recently completed "Analysis of Impediments to Fair Housing Choice." The previous Housing Element objective was to complete that aforementioned analysis which was completed in 2000 and updated in 2004-2005.

Quantified Objective: Energy Conservation

Maintain the goal of reducing by two percent the total utility consumption per customer, increase water conservation by five percent by 2010, promote increased energy conservation in 20 housing development projects annually by encouraging developers to exceed California Title 24 standards, encourage initiatives to increase the use of renewable resources with the goal of builders/developers offering solar options in 50 percent of new single-family housing units developments by FY 2010. The objective was changed to define total energy consumption by customer rather than per capita to more accurately gauge usage; however, utility customers now have the ability to choose their provide making it more difficult to track usage. Additional new goals were added to incorporate newly adopted state energy efficiency standards and encourage alternative energy efficient technologies.

II. ENVIRONMENTAL SETTING: The entire City of San Diego.

III. DISCUSSION

San Diego's fair share allocation is 45,741 units over the 7.5 year period (January 1, 2003 through June 30, 2010) with specific goals for providing moderate, low and very-low income housing. According to the preliminary 2030 SANDAG forecast it was estimated that the City of San Diego would need 17,000 additional housing units above the existing plans and policies forecast for 2020. The proposed Housing Element Update includes a number of policies and programs which are either ongoing or are in the process of being implemented which would

facilitate the provision of needed housing for various income levels and address the current housing shortage. It also reflects a reduction in the current Administration's federal funding for programs which had been fundamental to the City's affordable housing strategy in the past, discusses housing being built by entities (Federal & State) within the City of San Diego's jurisdiction, and reflects the need to build housing at greater densities to achieve affordability due to increased land costs.

The Housing Element Update has been written to be consistent with the Strategic Framework Element which was adopted in October 2002. Therefore, as part of the Housing Element's "Provision of an Adequate Site Inventory Goal" the updated element would support the identification of locations appropriate for Urban Villages and mixed-use development incorporating housing as well as employment and retail uses. The five-year goal is to establish five urban villages including 3,000 housing units. The goals, policies and objectives within the Housing Element are intended to guide updates and amendments to community plans. While the City strives for consistency between elements of the General Plan and community plans, the community plan updates and amendments are subject to approval or rejection by the appropriate legislative body.

In addition, the proposed Housing Element Update also includes support for a number of existing or strengthened policies to facilitate the provision of additional housing. The referenced policies and implementing ordinances include the Density Bonus Ordinance, Inclusionary Housing Ordinance, farmworker housing, the Single Room Occupancy approval process, space and parking standards for emergency shelters, the policy requiring adherence to minimum zone densities, and the incorporation of universal design. An ongoing policy of the Housing Element would include seeking a balance between allowing condominium conversions, which increases relatively affordable home buying opportunities, and the protection of low-income renters who could be displaced by condominium conversions.

When assessing a significant environmental impact, the California Environmental Quality Act (CEQA) Section 15382 states that a "significant effect on the environment: means a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project . . ." While the adoption of the proposed Housing Element Update does not directly lead to physical impacts, the application of the proposed policies in conjunction with specific projects could directly and indirectly lead to physical impacts.

Per CEQA Section 15003 (h), "The lead agency must consider the whole of an action, not simply its constituent parts, when determining whether it will have a significant environmental effect." While the proposed Housing Element Update does not contain specific project locations, policies, specific numeric goals have been identified, and implementation of the City of Villages strategy could indirectly lead to zoning changes and community plan amendments. The Housing Element Update does not change any of the goals and policies of the City of Villages Growth Strategy - Strategic Framework Element (COV/SFE); therefore, it is anticipated that adoption of the Housing Element would result in similar impacts to those disclosed in the previously prepared EIR.

This is an addendum to the COV/SFE EIR and as such, it is part of the first tier regional analysis of the potential effects of adopting the policies and goals of the COV/SFE and the Housing Element. The mitigation set forth in the COV/SFE EIR and referenced in this Addendum is by necessity generalized as site-specific information is unknown at this time. It is intended that the

second tier analysis will be contained in the environmental documents that will accompany community plan updates, when more detailed site-specific information will be available, and the impacts of the updates can be reasonably assessed without speculation. A third tier analysis will be done as individual projects come forward.

V. DETERMINATION:

The City of San Diego previously prepared an Environmental Impact Report (EIR) LDR No. 40-1027, *The City of Villages Growth Strategy - Strategic Framework Element*. Based upon a review of the proposed Housing Element Update for Fiscal Years 2005-2010, it has been determined that:

- A. There are no new significant environmental impacts not considered in the previous EIR.
- B. No substantial changes have occurred with respect to the circumstances under which the project is undertaken; and
- C. There is no new information of substantial importance to the project.

Therefore, in accordance with Section 15164 of the State CEQA Guidelines, this addendum has been prepared. While CEQA does not require public review of addenda, Section 128.0306 of the City's Land Development Code mandates a 14-day public review period for those addenda to EIRs certified more than three years previously.

VI. MITIGATION, MONITORING AND REPORTING PROGRAM INCORPORATED INTO THE PROJECT:

The previous final EIR No. 40-1027 for *The City of Villages Growth Strategy - Strategic Framework Element*, dated June 14, 2002, concluded that the Strategic Framework Element would result in significant and unmitigated impacts to Transportation, Solid Waste Disposal, and Air Quality. The EIR also concluded that some of these impacts as well as significant impacts to Paleontological Resources, Noise, Historical Resources, Public Health and Safety, Recreation Facilities and Geologic Hazards could be mitigated during future site-specific CEQA review for development proposals requiring subsequent discretionary permits. Mitigation measures that addressed Air Quality, Paleontological Resources, Noise, Historical Resources, Solid Waste Disposal, Public Health and Safety, Recreation Facilities, and Geologic Hazards were adopted with the certification of the Final EIR 40-1027 and are still applicable to this current proposal. A summary of the mitigation measures is attached in the City Staff Conclusions for the EIR.

VII. SIGNIFICANT UNMITIGATED IMPACTS:

There are no new significant impacts identified in conjunction with the implementation of the Housing Element Update, and significant effects previously examined will not be substantially more severe than shown in the previous EIR. There is no new information that was not known when the original EIR was certified, and the significant effects previously examined would not be substantially more severe than those shown in the previous EIR.

Because there are significant unmitigated impacts associated with the original project approval of the project required the decisionmaker to make specific and substantiated CEQA Findings which stated that:

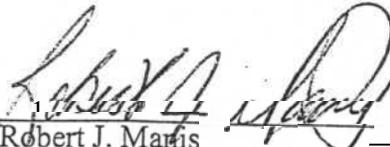
a) specific economic, social or other considerations make infeasible the mitigation measures or project alternatives identified in the final EIR, and

b) these impacts have been found acceptable because of specific overriding considerations. No new CEQA Findings are required with this project.

VIII. RESULTS OF PUBLIC REVIEW:

- () No comments were received during the public input period.
- () Comments were received but they did not address the findings of the draft Addendum and/or accuracy or completeness of the Initial Study. No response is necessary. The letters and responses follow.
- (X) Comments addressing the findings of the draft Addendum 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 Addendum, Project No. 90947, and EIR No. 40-1027 may be reviewed in the office of the land Development Review Division, or purchased for the cost of reproduction.


Robert J. Maris
Assistant Deputy Director
Development Services Department

March 2, 2006
Date of Draft Report

March 22, 2006
Date of Final Report

Analyst: Mirrasoul

Attachment: Conclusions of EIR No. 40-1027

DISTRIBUTION:

The Public Notice and/or draft Addendum to EIR No. 40-1027 and Conclusions were distributed

City of San Diego
Mayor Sanders
Council President Peters, District 1
Councilmember Faulconer, District 2

Councilmember Atkins, District 3
Councilmember Young, District 4
Councilmember Maienschein, District 5
Councilmember Frye, District 6
Councilmember Madaffer, District 7
Councilmember Hueso, District 8
City Attorney
Development Services Department (78, 78A)
Library (81)
Real Estate Assets Department (85)*
Engineering and Capital Projects Department (86)*
Historical Resources Board (87)*
Park and Recreation Department (89)*
Wetland Advisory Board (91A)*
Planning Department (MS 4A)
Water Department
Metropolitan Wastewater Department
Environmental Services Department
San Diego Housing Commission (MS 49N)
Community and Economic Development (MS 904)

Community Service Centers:

Clairemont (274)
Navajo (337)
Peninsula (389)
Rancho Bernardo (399)
San Ysidro (435)
Scripps Ranch (442)

Federal Agencies

Naval Facilities Engineering Command, SW Division (12)*
MCAS Miramar (13)*
US Environmental Protection Agency (19)*
U.S. Fish and Wildlife Service (23)*
U.S. Army Corps of Engineers (26)*

Native Americans

Ron Christman (215)*
Louie Guassac (215A)*
Kumeyaay Cultural Repatriation" Committee (225)*
Native American Bands and Groups (225A - Q) (notice only)*

State of California

CALTRANS, District 11 (33)*
Department of Fish and Game (32)*
Department of Parks and Recreation (40)*
Department of Parks and Recreation, Office of Historic Preservation (41)*
Resources Agency (43)*
Regional Water Quality Control Board, Region 9 (44)*

California Coastal Commission (47)*
Native American Heritage Commission (56)*

San Diego County

Department of Planning and Land Use (68)
County Water Authority (73)
Department of Environmental Health (75)*

Other Agencies

San Diego Association of Governments (108)
San Diego Transit (12)
Sempra (114)
Metropolitan Transit Development Board (115)

Community Groups

Community Planners Committee (194)
Otay Mesa - Nestor Planning Committee (228)
Otay Mesa Planning Committee (235)
Clairemont Mesa Planning Committee (248)
Greater Golden Hill Planning Committee (259)
Serra Mesa Planning Group (263A)
Kearny Mesa Community Planning Group (265)
Linda Vista Community Planning Committee (267)
La Jolla Community Planning Association (275)
City Heights Area Planning Committee (287)
Kensington-Talmadge Planning Committee (290)
Normal Heights Community Planning Committee (291)
Eastern Area Planning Committee (302)
Midway Community Planning Advisory Committee (307)
Mira Mesa Community Planning Group (310)
Mission Beach Precise Planning Board (325)
Mission Valley Unified Planning Organization (331)
Navajo Community Planners Inc. (D336)
Carmel Mountain Ranch Community Council (344)
Carmel Valley Community Planning Board (350)
Del Mar Mesa Community Planning Board (361)
Greater North Park Planning Committee (363)
Ocean Beach Planning Board (367)
Old Town Community Planning Committee (368)
Pacific Beach Community Planning Committee (375)
Rancho Penasquitos Planning Board (380)
Peninsula Community Planning Board (390)
Rancho Bernardo Community Planning Board (400)
Sabre Springs Planning Group (406B)
San Pasqual - Lake Hodges Planning Group (426)
San Ysidro Planning and Development Group (433)
Scripps Ranch Community Planning Group (437)
Miramar Ranch North Planning Committee (439)
Skyline - Paradise Hills Planning Committee (443)

Torrey Hills Community Planning Board (444A)
Southeastern San Diego Planning Committee (449)
Encanto Neighborhoods Community Planning Group (449A)
College Area Community Council (456)
Tierrasanta Community Council (462)
Torrey Pines Community Planning Group (469)
University Community Planning Group (480)
Uptown Planners (498)

Other Interested Parties

San Diego Apartment Association (152)
San Diego Chamber of Commerce (157)
Building Industry Association (158)
San Diego River Park Foundation (163)*
Sierra Club (165, 165A)*
San Diego Natural History Museum (166)*
San Diego Audubon Society (167, 167A)*
California Native Plant Society (170)*
Center for Biological Diversity (176)*
Endangered Habitats League (182 & 182A)*
Carmel Mountain Conservancy (184)*
Torrey Pines Association (186)*
Carmen Lucas (206)*
Dr. Jerry Schaefer (208A)*
South Coastal Information Center (210)*
San Diego Historical Society (211)*
San Diego Archaeological Center (212)*
Save Our Heritage Organisation (214)*
San Diego County Archaeological Society Inc. (218)*
La Jolla Historical Society (221)*
University of San Diego (251)*
Tecolote Canyon Citizens Advisory Committee (254)*
Friends of Tecolote Canyon (255)*
Tecolote Canyon Rim Owner's Protection Association (256)*
UCSD Natural Reserve System (284)*
Friends of the Mission Valley Preserve (330)*
Mission Trails Regional Park Citizens Advisory Committee (341)*
Los Penasquitos Canyon Preserve Citizens Advisory Committee (360)*
Pacific Beach Historical Society (377)*
Sunset Cliffs Natural Park Recreation Council (388)*
San Dieguito Lagoon Committee (409)*
San Dieguito River Park CAC (415)*
San Dieguito River Valley Conservancy (421)*
RVR PARC (423)*
San Dieguito River Park JPA (425A)*
Beeler Canyon Conservancy (436)*
Mission Trails Regional Park (465)*
UCSD (478)*
Corey Briggs

SEDC (MS 68)
CCDC (MS 51D)

City of San Diego Planning Department Housing Issues Interest List*

* (Public Notice Only)

From: "Lee Campbell" <lee@campbellot.com>
 To: <mmirrasoul@sandiego.gov>
 Date: 3/15/2006 11:24:15AM
 Subject: project 90947 comments

hi marilyn

comments:

1. the old values should be identified. example goal 1 objective line 6: 'this objective is unchanged ... except for the changed regional share goal ... - the new goal of 45,751 is stated but the old goal value fsnt.
2. goal 2 all objectives - how will this be accomplished in areas that are **redeveloped, redevelopment** causes housing costs and rents to increase in the area of redevelopment which forces residents and business out to remaining lower cost areas. does the rehabilitation objective take this affect of redevelopment into account
3. goal 4 - 1st objective -what is the plan for getting the funds. does this mean extremely low and very low income groups also.
3. objective 2. why provide any assistance to first time home buyers when there are so many lower income families that need rental assistance.
4. page 5 - 1st objective why encourage more lower income people to come to san diego when we have significant environmental unmitigated impacts already.
5. page 6, 3rd para last sent. - is rent control being considered to protect low-income renters. will taxes be increased.
6. page 8 items a) and b), — what are the 'specific economic, social or other considerations'. --what are the 'significant overriding considerations' that make the findings acceptable when the impacts are significant and unmitigated. these should be summarized here. --who is the decisionmaker.

thanks

lee campbell
 terasanta community council

RESPONSE TO COMMENTS

1. The 7.5 year goal of 45,741 is slightly reduced (if calculated on a yearly basis) from the previous FY 1999-2004 Housing Element five-year goal of 39,785.
 2. The Maintenance and Conservation section of the draft housing element contains a variety of strategies to maintain and conserve affordable housing, with a particular emphasis on the preservation of affordable units that have price or rent restrictions.
 3. Yes. This objective also includes extremely low and very-low income renters.
 4. The City, including this City Council, has a goal of encouraging more home ownership. The Housing Element goals have been established to address the housing needs of the existing and anticipated population of San Diego over the next five years -- not to encourage new low-income residents to come to San Diego. San Diego is now experiencing a net out-migration and future needs are for the most part related to the existing population and new births rather than from new migrants.
 5. The Housing Element does not recommend rent control; and the City Council has been opposed to rent control in the past. The Housing Element is not the appropriate document in which to discuss tax increases. Tax increases would require a vote of the people.
 6. This comment references standard language that is included within all addendums prepared by the City. Per the California Environmental Quality Act, the lead agency (in this case the City of San Diego) shall prepare an addendum to a previously certified EIR if some changes or additions are necessary. Typically, addenda rely on the findings made for the previously prepared EIR which required that the decisionmaker (in this case the City Council) make findings of significant overriding considerations. A copy of the EIR conclusions was attached to the addendum to provide information regarding the significant unmitigated, partially mitigable, and mitigable impacts of the previously approved project.
- Specific economic, social or other considerations and specific overriding considerations* are made by the decisionmaker when certifying an EIR which discloses that significant unmitigated environmental impacts would occur with the implementation of a particular project. In general a statement of overriding considerations includes a description of benefits that would accrue with the implementation of the project or the reasons why the decisionmaker believes that the project benefits outweigh the adverse environmental impacts that may occur with the implementation of the project. The statement prepared for the previously certified EIR stated that that the implementation of the Strategic Framework Element would lead to the revitalization of communities, the preservation of single-family neighborhoods, the preservation of community character, the provision of affordable housing, less residential overcrowding, more efficient utilization of fiscal resources, the reduction of development pressure on rural and sensitive areas, increased environmental quality, the provision of opportunities for increased economic prosperity, support for a world-class transit system, opportunity to avoid congestions through transit and multi-modal transportation, and the minimization of congestion and other mobility improvements.



Land Development
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FINAL

ENVIRONMENTAL IMPACT REPORT

LDR No. 40-1027
SCH No. 2001061069

SUBJECT: The City of Villages Growth Strategy - Strategic Framework Element:
CITY COUNCIL APPROVAL of the proposed City of Villages **strategy**, the Strategic Framework Element, and the **Five-Year** Action Plan. This new growth strategy would replace the existing chapter "Guidelines for Future **Development**" (adopted in 1990) within the *City of San Diego General Plan and Progress Guide*. The Guidelines for Future Development included in new growth management plan to supplement the previously adopted Tier system. Much of the direction focused upon the development of vacant land. Since less than ten percent of the **City's** 331 square miles is currently vacant and **available** for **development**, the 1990 guidelines are now largely obsolete. The proposed Strategic Framework Element provides a long-term strategy for accommodating the **City's** forecasted population growth and **development needs**, predominately through effective and innovative redevelopment and infill in mixed-use villages of higher density attached homes and commercial **and/or** employment **centers**. The proposal could result in an additional **17,000** to 37,000 attached homes needed to support the projected City of San Diego population growth based upon regional population projections for the year 2020 and beyond. Applicant: City of San Diego/Planning Department

CONCLUSIONS:

This Environmental Impact Report (EIR) addresses the potential environmental impacts resulting from the implementation of the proposed City of Villages growth strategy. The proposed growth strategy would **replace** the Guidelines for Future Development in the City's Progress Guide and General Plan; the proposal also includes a **Five-Year** Action Plan, an implementation **program**, and the application of the previously adopted Transit Oriented Development (TOD) guidelines as an overlay for each potential village center identified on the City of Villages Map, as a interim measure until community plans are amended with community and site specific design standards to implement the proposal. The proposed growth strategy would result in intensified mixed-use village centers with attached homes and commercial and employment uses. The villages would be connected to a world class transit system as envisioned in the concurrent strategic planning effort, the Transit First program, by the **Metropolitan** Transit Development Board (MTDB). In

general, the growth strategy would rely on redevelopment and infill of older commercial areas for the intensification of new village sites. For environmental analysis purposes it was determined that 17,000 to 37,000 attached homes could be the result by 2020 as the new growth policy is implemented; it is recognized that this number of units may not be realized for 20 years. The number 17,000 was projected by SANDAG's 2030 Forecast, a preliminary 2030 population forecast which predicted that there would be a need for 17,000 homes beyond the yield of the existing plan and zone for the City of San Diego. The range 17-37,000 units, was evaluated to allow for a variation in the growth rate.

The proposed City of Villages growth strategy is an initial General Plan policy change which would be implemented through a series of more specific actions leading to actual development of villages and corridors throughout the City. The environmental review is tiered as well. This EIR, addressing the proposed growth policy change, is programmatic in that this document would be followed by a series of more specific environmental documents, as the proposal gets closer to implementation. Subsequent discretionary actions include plan updates/amendments, rezones and development permits.

Land Use Consistency

The proposed City of Villages strategy, the Strategic Framework Element, would retain the intent of the current community, specific, subarea, and park plans' environmental goals and policies. These goals and objectives address habitat, wildlife, natural open space, and natural drainages, and their implementation has been assured by the adoption of the City's Multiple Species Conservation Program, project and plan level analysis, application of the Environmentally Sensitive Land Ordinance, and open space zones. The proposed growth strategy would pose no direct or indirect impact on these resources.

Although, the City of Villages strategy proposes changes in growth patterns, it does not change the existing general land uses. However, there are three areas identified or subsequent potential villages and three corridors that could result in land use intensification located in the noise impact area of Lindbergh Field.

According to the City's significance guidelines inconsistency/conflict with the environmental goals, objectives, or guidelines of a community plan or the General Plan would be considered a significant land use impact. However, the proposed City of Villages strategy, the Strategic Framework Element, is an amendment to the City's *Progress Guide and General Plan*. If this new policy is adopted, it would guide the future growth and development within the City. As community plans are subsequently updated to allow the implementation of the City of Villages and/or amended to allow development consistent with the new policy for growth and development, the community plans; goals and policies would be revised to reflect the new City of Villages strategy. Therefore, adoption of the proposed growth policy does not pose a significant land use impact. That is not to say that land use would not be considered a significant

impact in future more specific environmental analysis associated with community plan amendments or updates or individual village project proposals.

There are existing regulations which require review of any subsequent development proposals for consistency with the airport land use plans. Therefore, the proposed project would not pose a significant impact related to airport land use compatibility.

The EIR concluded that the following issues were significant and could not be mitigated at this general plan policy review stage:

Transportation

The potential additional 17,000 to 37,000 attached homes which could result as the proposed City of Villages is implemented could ultimately generate 180,000 to 240,000 additional vehicle trips. These additional trips would pose direct and indirect traffic impacts. While the expected features of the proposed project, namely the expanded and improved transit system and the village design and location, would encourage transit use and make walking and biking safer and more attractive, these would remain voluntary transportation choices for most of the new residents of the villages. The modeling indicated an approximately six percent reduction in all travel trips attributable to transit use and walking. In addition, traffic congestion is and would continue to be a regional problem; therefore, the project's traffic impact is significant.

As subsequent implementing discretionary actions such as community plan amendments, rezones, or permits are required for larger village development, more specific traffic analysis would be required. These traffic analysis may refine the contribution of the alternative transportation modes and at a minimum, traffic impacts could be further reduced.

The proposed project combined with regional efforts by SANDAG and MTDB's Transit First program could encourage new residents to choose alternative, less impactful, transportation modes. The planned High Occupancy Vehicle (HOV) facilities are expected to increase regional carpooling. The modeling for the proposed City of Villages strategy showed a conservative limited effect of the proposed villages increased walking and transit use. These measures are partial mitigation at best, and significant future traffic congestion impacts will not be reduced to below a level of significance.

Solid Waste Disposal

The proposed growth strategy, if adopted and fully implemented, could result in 17,000 to 37,000 attached homes; these homes would generate 20,000 to 44,000 tons of waste on an annual basis. In addition, the implementation of the proposed growth strategy would most likely require demolition of existing structures: this would add to the project's impact. These impacts are considered potentially significant.

While there is some assurance that once the City's Miramar Landfill closes in 10 to 14 years, the privately-owned Sycamore Landfill would be able to handle the City's refuse, there remains some uncertainty about the solid waste disposal capacity for the City, the City is not currently engaged in active landfill siting efforts.

Partial mitigation to reduce the significant waste disposal impact would be to extend the recycling program to attached homes and larger businesses. This would reduce the refuse generated by the additional attached homes and mixed-use intensification. Additional partial mitigation would be on site reuse of demolition materials for new asphalt paving and other uses. However, the major concern is the limited remaining life of the City's Miramar Landfill and the uncertainty of adequate capacity at the privately-owned Sycamore Landfill to handle the City's projected waste stream, let alone, accommodate the additional refuse expected to be generated by the project's resultant potential yield of 17,000 to 37,000 attached homes in 2020. The project's potential impact on the future solid waste disposal capacity remains significant and not mitigated at this time.

Air Quality

The state computer model, URBEMIS 7G, was used to estimate air pollutant emissions resulting from the potential 17,000 to 37,000 attached homes which might result from the subsequent implementation of the proposed City of Villages strategy. Results include pollutants from motor vehicles use caused by the additional homes, construction of these new homes, and area source pollutants. Area source pollutants include use of house paints, fireplaces, landscape equipment, and evaporation of solvents in consumer products. The model indicated that development design features, design, and siting which encourage walking and bicycling in and around the potential villages and the vastly expanded public transit to these villages and along corridors, would result in only 9%-10% potential reduction in the motor vehicle emissions.

For this analysis, it was assumed that all potential village centers and corridors would redevelop and result in a maximum of 37,000 attached homes. Air pollutants from passenger cars and pick-up trucks accounted for 93.64 tons of daily Reactive Organic Gas (ROG) emissions or 38% of the total estimate for 2000. There is a declining trend of air pollutant emissions from passenger cars; roughly, the average car in 2020 would emit less than 20% of the emissions as in 2001. This reduction is similar for pick-up trucks. Even considering that vehicle use might continue to grow faster (1.5 times) than population increase (1.2 times) and assuming the maximum redevelopment of 37,000 additional attached homes, a rough estimate of Reactive Organic Gas emissions in 2020 would be less than the current 243 daily tons of Reactive Organic Gas. Currently at or slightly higher level of Reactive Organic Gas emissions, the San Diego Air Basin has met the federal clean air standard for ozone for the past three years without a concurrent significant reduction in Oxides of Nitrogen (Nox) emissions. This may suggest that the proposed City of Village strategy would not significantly deteriorate ambient air quality for the region's current air quality concern, ozone.

Another consideration is the growth forecast used in the air quality strategy to attain the ozone standard. The baseline for Reactive Organic Gas and Oxide of Nitrogen, the SIP budget, was established based upon projections in the early 1990's, a projection similar to SANDAG's Series 8. For the county, Series 8 predicted 3.76 million people by 2015. This was slightly higher (3%) than the recent 2020 forecast. The 2020 forecast were used in the 2020 Regional Transportation Plan. This plan had an air quality conformity analysis which demonstrated that the motor vehicles accommodated by this plan would not adversely affect regional air quality effort to attain the ozone standard. Specifically, the analysis compared the regional motor vehicle emissions to the SIP budget. The proposed City of Villages might result in a potential maximum of 37,000 attached homes; the number of people living in these additional homes is less than 3% of the previously projected population for 2020.

Without a comprehensive update of the regional air quality forecast strategy by the Air Pollution Control District and/or the California Air Resources Board, using revised population growth forecast and considering the proposed City of Villages strategy, the project's impact to air quality is moot at best. In addition, the modeling results for 37,000 additional attached homes, estimated pollutant levels even with mitigation of increased transit and bicycle use and walking, would exceed the City's significance criteria. Therefore, the project's air quality impact is considered significant and unmitigated.

Mitigation for air quality impacts is similar to mitigation for traffic congestion in that flattening out or distributing the peak-hour traffic will reduce congestion and will benefit air quality through faster, more efficient combustion of fossil fuels in progressively cleaner motor vehicles. However, in an area such as San Diego where the population has continually increased and regional efforts towards densification and improved transit have begun, another available solution is vehicle trip reduction. Trip reduction requires a dramatic sociological change from freeway/passenger car dominance to public transportation or alternative mode such as walking or bicycling. Between 1982 and 1987, four Transportation Control Measures (TCMs) were implemented as part of the regional strategy to attain clean air. They were bicycling, carpooling, transit improvements, and traffic flow improvements. The proposed City of Villages strategy complements the two alternative mode TCMs, bicycling and transit improvements, as well as walkability through the proposed intensification of redeveloped/infilled mixed uses and concentration of higher density attached homes in villages and transit corridors.

In addition to these local TCMs, the state was required to establish by the year 2000:

- o Stricter California vehicle emissions standards,
- o Adopt controls for off-road and construction vehicles, utility engines and boats,
- o Adopt stricter evaporation specifications for fuels, and
- o Control evaporative emissions (ROG) from certain area sources - consumer products containing oils, solvents, and other organic compounds.

Solutions to regional traffic congestion and subsequent air quality impacts on major roads and prime arterials cannot be resolved through the community planning process. Prime arterials and major roads carry traffic through a community. Solutions other than continual road-widenings, such as alternative transportation modes, require regional planning and coordination. Most of

these larger roads could accommodate transit modes. To plan the routes, connections, stops, frequency and destinations to attract ridership requires regional planning. This regional effort has begun, and the proposed City of Villages strategy recommends the required land use and distribution of land uses to implement the Regional Transportation Vision and the Transit First project.

The air quality model indicated that development design features, design and siting which encourage walking and bicycling in and around the potential villages, and the vastly expanded public transit to these villages and along corridors result in a minimal 9%-10% potential reduction in the motor vehicle emissions.

It should be noted that there is a possibility that once potential villages are in place, transit service is vastly improved, and walking and bicycling become more attractive, residents in areas surrounding the villages and corridors would be more likely to use these alternative modes of transportation. The current modeling does not account for these potential collateral benefits.

Although partially mitigated, the project's air quality impact remains significant and unmitigated.

The EIR concluded that the following environmental issues were determined to be significant but that the implementation of the proposed Mitigation Monitoring and Reporting Program (MMRP) would reduce these significant impacts to below a level of significance:

Paleontological Resources

Many fossil sites presently on record in San Diego have been discovered during construction operations. Weathering quickly destroys most surface fossil materials, and it is not until fresh, unweathered exposures are made by grading that well-preserved fossils can be recovered. Adverse impacts occur when excavation activities cut into fossiliferous geological deposits, and cause physical destruction to fossil remains.

Several current community plans identify preservation of paleontological resources as an environmental goal for their community. Since the proposed City of Villages would ultimately result in the redevelopment/infill of large, existing surface parking, it would encourage the development of separate parking structures or subterranean garages. While mass grading into fossil-bearing bedrock is not envisioned; there is a possibility of deep excavations for subterranean garages. If the excavated geologic formation has a high probability for fossils and

the required excavation is into unweathered bedrock, fossils may be unearthed. If these fossils are unweathered and well-preserved and if they add to our knowledge of paleo-ecology or represent type specimens, these resources must be considered significant.

In the case of fossil resources, there has been enough scientific study of the San Diego region that the geologic rock formations likely to contain important fossils have been identified. The potential adverse impact of the proposed project could be reduced if the regulations required

construction monitoring under appropriate circumstances. It is a standard City procedure that when a discretionary development project is proposed in a geologic formation having been identified as yielding important **resources**, and the site development requires grading deep

enough to reach **unweathered bedrock**, monitoring for paleontological resources is required during grading. Paleontological resources even if **detected**, can be mitigated with strict adherence to standard mitigation measures.

When there is a possibility that the proposed excavation could encounter unweathered portions of a known fossiliferous rock formation, preventative measures would need to be implemented to mitigate any significant impacts to paleontological resources. These include monitoring by a retained qualified paleontologist, the ability to divert excavation by the paleontological monitor if fossils are encountered, curation of significant finds at a qualified curation facility, and **submittal** of a report detailing the monitoring **and/or** fossil recovery effort.

Geologic Hazards.

Centre City and Mission Valley are susceptible to seismic hazards posed by the active Rose Canyon fault. The proposed City of Villages strategy, when **implemented**, would eventually result in land use intensification in Mission Valley and Centre City. Numerous **geotechnical** reports have been conducted in both areas. No structure is allowed to straddle the Rose Canyon Fault, and those to be built near the fault trace are required to conduct detailed, subsurface geotechnical studies to assure that any proposed structure would be **seismically** sound.

Most geologic constraints are mitigable with proper engineering design and solutions and avoidance of active fault with sufficient setback of any proposed structure. All potential significant geologic impacts can be mitigated with strict adherence to the recommendations of the required site-specific, subsurface geotechnical investigations and all applicable regulatory requirements.

The following measures should be considered in areas such as Centre City and Mission Valley where there are potential seismic risk. The measures for the project site preparation, site design, and construction would be specified in a site-specific study; typical measures would include monitoring for differential settlement during construction, proper compaction, removal of any undocumented fill, installing a **well-compacted** structural fill with geotextile reinforcing, where

necessary, and preparing a subsurface geotechnical investigation to evaluate the thickness of **unconsolidated** material determined to be susceptible to ground shaking. This investigation should provide site specific grading recommendation, foundation design criteria, and design of **surficial** improvements.

Noise

There were twenty transit corridors with traffic volumes which exceed the 65 dBA Community Noise Equivalent Level and which were identified by the proposed City of Villages for possible residential intensifications. However, there would be no impacted areas with elevated significant noise levels which can not be mitigated.

All new residential development which would be subjected to exterior noise levels above 65dBA Community Noise Equivalent Level is determined to be exposed to a significant noise **impact**, and interior noise levels exceeding 45 dBA would also be exposed to a significant noise impact. For most construction methods and standard construction materials used in this area, exterior noise levels can be expected to be reduced only by 15 dBA. For noise impacted **areas**, to achieve the interior noise standard, additional insulation, double-pane windows, solid doors, less window area, mechanical ventilation, and upgraded construction material may be required; for areas impacted by aircraft noise, these additional features would be required for all new homes at the time building permits are obtained.

For traffic noise, significant noise levels can be mitigated with noise attenuation in addition to special construction material. These noise attenuation measures include such items as solid walls (masonry or **plexi-glass**), setback, and site design where the residential structure is set at an optimal angle from the noise source or is blocked from the noisy road by structures containing less sensitive uses. In general, the noise attenuating site design features for residential uses can be **more** easily accomplished with a mixed **use** development.

Historic Resources

The proposed City of Villages strategy has identified the area in the vicinity of I-5 off ramp at Garnet Avenue as a potential neighborhood village center. This area has a possibility of containing a portion of a suspected village site. The potential, subsequent intensification of land use (e.g. subterranean parking) on this site may result in an adverse effect on a subsurface archaeological resource. If this growth strategy is approved and this site is subsequently becomes planned and zoned for higher intensities, the potential for significant subsurface resources must be addressed prior to grading.

The proposed City of Villages strategy has identified the 25th Street as a potential neighborhood village center. The west side of 25th Street is in the Greater Golden Hill Historic District. Each of the **five** and one-half blocks on the west side of 25th Street has historic buildings **which** contribute to the historic district. Any new development which may **ultimately** result from this proposed **growth** strategy **would** most likely be **adjacent** to a **historic** structure. New development on the east side outside of the district may **affect** the setting **and/or** integrity of the historic district.

The proposed City of Villages strategy has identified Sao **Ysidro** Boulevard west of I-805 as a potential transit **corridor**. This corridor traverses the **potentially** historic Little **Lander's** Colony. **In** addition, the designated San Ysidro Free Public Library is located on this potential transit

corridor. Any new development which may ultimately result from this proposed growth strategy may affect the setting/integrity of the potentially historic area and the designated library.

The proposed City of Villages strategy has identified East San Ysidro Boulevard east of I-805 as a potential neighborhood village center. This area contains the historic El Toreador Motel. Any new development which may ultimately result from this proposed growth strategy may affect the setting and/or integrity of this historic area.

The proposed City of Villages strategy has identified the south side of Crosby Street as a potential neighborhood village center. This area contains the historically designated Chicano Park. Any new development which may ultimately result from this proposed growth strategy may affect the setting and/or integrity of this designated park, a renowned cultural feature.

The proposed City of Villages strategy may potentially result in land use intensification on an area with possible significant archaeological resources, on three areas with significant historic resources, and an area of potential historic value. If the proposed growth strategy is adopted and these areas are designated as mixed-use higher density villages through a community plan update or amendment process, development could result in potentially significant impacts to historic resources. If subsequent development results in the loss of a designated structure, reuse and alternatives to the proposal must be addressed.

The resultant, potential redevelopment and infill discourages the continuing use of existing and/or the construction of new surface parking lots; the resultant desired urban residential densities and mixed uses would most likely require subterranean parking levels. The subsurface excavation may adversely effect potential subsurface cultural resources.

Whenever potentially significant subsurface cultural resources are suspected, and if these resources are determined to be significant, the preferred mitigation measure is either avoidance or preservation in place. The City's Historical Resources Guidelines (as amended June 2000) suggest mitigation measures for preservation.

When avoidance of significant subsurface cultural resources (e.g. archaeological resources) is not feasible, the mitigation measure shall include research design and data recovery program. The required research design shall identify important research questions, link research topics to data already known to be present in the proposed development site, and explain procedures which would be used in the collection, analysis, and curation of recovered materials. The sample size, the area to be excavated for resources, would vary with the nature and size of the proposed development site.

When preservation of a significant historic structure on a development site, cannot be completely implemented, all feasible mitigation measures to minimize the significant impact to the historic resource shall be taken. When preservation of a significant historic structure on a development

site is not viable and the historic structure needs to be moved **off-site**, the relocation shall be performed in accordance with National Parks Service standards. The relocation site shall **duplicate**, as closely as **possible**, the original location. In addition, the historic structure shall be documented according to Historic American Building Survey (**HABS**) or Historic American Engineering Record (**HAER**) standards.

When the significant, historic structure cannot be preserved or relocated and it needs to be demolished, it shall be documented according to HABS or HAER standards prior to demolition.

Impacts to significant historic resources can be mitigated with strict adherence to standard mitigation measures. Any action involving a historically designated structure would trigger a discretionary permit and would be **subject to CEQA** review. The loss of a historically designated structure may be mitigated; however, the proposal which results in **the** loss would be subject to addressing alternatives including reuse of the structure and disclosing the evaluation in an site-specific environmental impact report.

Any potential impacts to significant historical resources posed by the subsequent intensification allowed by the implementation of this proposed growth **strategy**, can be mitigated. Therefore, the potential impacts of this growth strategy are considered significant but **mitigable**.

Human Health and Safety

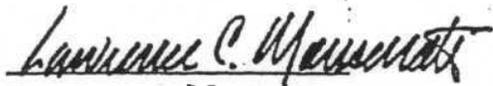
The proposed City of Villages would result in the possible addition of 17,000 to 37,000 attached homes in potential mixed use villages and corridors throughout the City. Redevelopment in most parts of the long urbanized areas especially along commercial corridors and in Centre City, would most likely encounter hazardous materials. This would pose a significant health and safety impact.

Toxic air contaminants are required to be strictly controlled by APCD rules and regulation. APCD **reports** that toxic air contaminant emissions should not necessarily be equated with a significant health risk to any individual or the public.

A Phase I site assessment must be conducted where the site shows apparent signs of spills or storage empty barrels or rusted tanks; any indication that suggests hazardous material use and spills is noted. The second part of this initial assessment is to conduct a record search to determine any use of hazardous materials on site. If evidence suggests a potential problem, confirmation must be made by subsurface collection of soil samples and laboratory **analysis** of the samples. If **contaminated**, remediation may include soil removal or soil remediation. The level of cleanup is based upon how the site would be used once it is **remediated**. For instance, level of cleanup for an area of open space would be much

lower than if residences were to be constructed Remediation is usually possible but it may be costly and time consuming. These standard measures would mitigate my potentially significant effect due to **hazardous** materials, to below a level of significance.

More detailed mitigation is contained in the text of this **EIR** and in the Mitigation Monitoring and Reporting Program.



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