EXHIBIT A

DRAFT CANDIDATE FINDINGS

REGARDING FINAL ENVIRONMENTAL IMPACT REPORT FOR THE

SOUTHEASTERN SAN DIEGO AND ENCANTO NEIGHBORHOODS COMMUNITY PLAN UPDATES

PROJECT NUMBER 386029

SCH No. 2014051075

September 2015

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I. INTRODUCTION

A. Findings of Fact and Statement of Overriding Considerations

The following Candidate Findings are made for the Southeastern San Diego and Encanto Neighborhoods Community Plan Updates (hereinafter referred to as CPUs or the "Project"). The environmental effects of the Project are addressed in the Final Environmental Impact Report ("FEIR") dated October 2015 (State Clearinghouse No. 2014051075), which is incorporated by reference herein.

The California Environmental Quality Act (CEQA) (Pub. Res. Code §§ 21000, *et seq*.) and the State CEQA Guidelines (Guidelines) (14 Cal. Code Regs §§ 15000, *et seq.*) promulgated thereunder, require that the environmental impacts of a proposed project be examined before a project is approved. In addition, once significant impacts have been identified, CEQA and the CEQA Guidelines require that certain findings be made before project approval. It is the exclusive discretion of the decision maker certifying the EIR to determine the adequacy of the proposed candidate findings. Specifically, regarding findings, Guidelines Section 15091 provides:

(a) No public agency shall approve or carry out a project for which an EIR has been certified which identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings for each of those significant effects, accompanied by a brief explanation of the rationale for each finding. The possible findings are:

1. Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

2. Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.

3. Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR.

(b) The findings required by subdivision (a) shall be supported by substantial evidence in the record.

(c) The finding in subdivision (a)(2) shall not be made if the agency making the finding has concurrent jurisdiction with another agency to deal with identified feasible mitigation measures or alternatives. The finding in subdivision (a)(3) shall describe the specific reasons for rejecting identified mitigation measures and project alternatives.

(d) When making the findings required in subdivision (a)(1), the agency shall also adopt a program for reporting on or monitoring the changes which it has either required in the project or made a condition of approval to avoid or substantially lessen significant environmental effects. These measures must be fully enforceable through permit conditions, agreements, or other measures.

(e) The public agency shall specify the location and custodian of the documents or other materials which constitute the record of the proceedings upon which its decision is based.

(f) A statement made pursuant to Section 15093 does not substitute for the findings required by this section.

These requirements also exist in Section 21081 of the CEQA statute. The "changes or alterations" referred to in Section 15091(a)(1) above, that are required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effects of the project, may include a wide variety of measures or actions as set forth in Guidelines Section 15370, including:

(a) Avoiding the impact altogether by not taking a certain action or parts of an action.

(b) Minimizing impacts by limiting the degree or magnitude of the action and its implementation.

(c) Rectifying the impact by repairing, rehabilitating, or restoring the impacted environment.

(d) Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action.

(e) Compensating for the impact by replacing or providing substitute resources or environments.

Should significant and unavoidable impacts remain after changes or alterations are applied to the project, a Statement of Overriding Considerations must be prepared. The statement provides the lead agency's views on whether the benefits of a project outweigh its unavoidable adverse environmental effects. Regarding a Statement of Overriding Considerations, Guidelines Section 15093 provides:

(a) CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits, including region- wide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered "acceptable."

(b) When the lead agency approves a project which will result in the occurrence of significant effects which are identified in the final EIR but are not avoided or substantially lessened, the agency shall state in writing the specific reasons to support its action based on the final EIR and/or other information in the record. The statement of overriding considerations shall be supported by substantial evidence in the record.

(c) If an agency makes a statement of overriding considerations, the statement should be included in the record of the project approval and should be mentioned in the notice of determination. This statement does not substitute for, and shall be in addition to, findings required pursuant to Section 15091.

Having received, reviewed and considered the Final Environmental Impact Report for the Southeastern San Diego and Encanto Neighborhoods Community Plan Update Project, State Clearinghouse No. 2014051075 (FEIR), as well as all other information in the record of proceedings on this matter, the following Findings of Fact (Findings) are made by the City of San Diego (City) in its capacity as the CEQA Lead Agency. These Findings and Statement of Overriding Considerations (SOCs) set forth the environmental basis for current and subsequent discretionary actions to be undertaken by the City and responsible agencies for the implementation of the project.

The following Findings and Statement of Overriding Considerations have been submitted by the Planning Department ("Applicant") as candidate findings to be made by the decision-making body. The Planning Department does not recommend that the discretionary body either adopt or reject these findings. They are attached to allow readers of this EIR an opportunity to review the applicant's position on this matter.

B. Record of Proceedings

For purposes of CEQA and these Findings, the Record of Proceedings for the proposed project consists of the following documents and other evidence, at a minimum:

- The Notice of Preparation (NOP) of a Draft EIR, dated May 27, 2014, and all other public notices issued by the City in conjunction with the proposed project;
- The Final EIR for the proposed project;
- The Draft EIR, circulated for public review between July 9, 2015 and September 8, 2015;
- All written comments submitted by agencies or members of the public during the public review comment period on the Draft EIR;
- All responses to written comments submitted by agencies or members of the public during the public review comment period on the Draft EIR and included in the Final EIR;
- The Mitigation Monitoring and Reporting Program (MMRP);
- The reports and technical memoranda included or referenced in Responses to Comments and/or in the Final EIR;
- All documents, studies, EIRs, or other materials incorporated by reference in the Draft EIR and the Final EIR;
- Matters of common knowledge to the City, including but not limited to federal, state and local laws and regulations;
- Any documents expressly cited in these Findings and Statement of Overriding Considerations; and
- Any other relevant materials required to be included in the record of proceedings pursuant to Public Resources Code Section 21167.6(e).

C. Custodian and Location of Records

The documents and other materials which constitute the administrative record for the City's actions related to the project are located at the City of San Diego, Planning Department, 1222 First Avenue, Fourth Floor, San Diego, CA 92101. The City Planning Department is the custodian of the administrative record for the project. Copies of these documents, which constitute the record of proceedings, are and at all relevant times have been and will be available upon request at the offices of the City Planning Department. This information is provided in compliance with Public Resources Code Section 21081.6(a)(2) and CEQA Guidelines Section 15091(e).

II. PROJECT SUMMARY

A. Project Location

The CPU areas are located within San Diego County, in the southern portion of the City of San Diego. Together, the CPU areas encompass approximately 6,740 acres, located east of Downtown and north of National City.

The Southeastern San Diego (SESD) Community Planning Area is located just east of Downtown San Diego, proximate to major employment and commercial centers in the South Bay and Downtown and linked to them by trolley and buses. Southeastern San Diego encompasses approximately 2,930 acres, excluding 121 acres of unincorporated San Diego County land (Greenwood Cemetery). Southeastern San Diego lies south of State Route 94 (SR-94), between Interstate 5 (I-5) and Interstate 805 (I-805), and north of the city limits of National City. Neighborhoods contained in Southeastern San Diego include Sherman Heights, Grant Hill, Stockton, Mt. Hope, Logan Heights, Mountain View, Southcrest and Shelltown.

The Encanto Neighborhoods Community Planning Area encompasses approximately 3,810 acres, and is located approximately five miles east of Downtown. The planning area is bounded by SR-94 to the north and I-805 to the west, providing access to local and regional destinations. The Southeastern San Diego Community Planning Area is immediately to the west. The City of Lemon Grove defines the northeast boundary of the Encanto Neighborhoods Planning Area roughly along 69th Street, while Woodman Street is the boundary with the Skyline-Paradise Hills Community Planning Area to the east. The City of National City defines the western half of the planning area's southern boundary. Plaza Boulevard marks the southern boundary to the east. Specific neighborhoods in the community include Chollas View, Lincoln Park, Valencia Park, O'Farrell, Alta Vista, Encanto, Emerald Hills, and Broadway Heights.

B. Project Background

The City has undertaken the CPUs to address changes in conditions since 1987, when the Southeastern San Diego Community Plan was adopted. As such, it is intended to define new strategies for how Southeastern San Diego and Encanto Neighborhoods could develop and function over the next 20 years. The analysis superimposed reasonably expected community buildout land uses into the San Diego Association of Governments (SANDAG) Series 12 2035 regional transportation forecast model. With adoption of the City's General Plan in 2008, the CPUs carry out the Guiding Principles of the General Plan as they pertain to the Southeastern San Diego and Encanto Neighborhoods communities. Thus, the CPUs would provide detailed policy direction needed to implement the General Plan with respect to the distribution and arrangement of land uses (public and private), local street and transit network, prioritization and provision of public facilities, community and site specific urban design guidelines, and recommendations to preserve and enhance natural open space and cultural resources within the Southeastern San Diego and Encanto Neighborhoods communities. CPU implementation requires adoption of a rezone ordinance that would rescind the existing Southeastern San Diego Planned District Ordinance (SESDPDO) and the Mt. Hope Planned District Ordinance (MHPDO) zoning and replace it with citywide zones contained within the Land Development Code (LDC) and create a new Community Plan Implementation Overlay Zone (CPIOZ) to implement design standards which are also part of the Project studied by this EIR.

The update to the SESD Community Plan, creation of the Encanto Neighborhoods Community Plan, Impact Fee Study (IFS) for each CPU, and zoning program is necessary to implement the goals and objectives of the City of San Diego's General Plan, which provides direction to identify potential smart growth infill areas to support the City's forecasted housing needs. The 1987 SESD Community Plan allows either stand-alone commercial or residential uses along the majority of transit corridors. The 1987 SESD Plan also places much of the future housing capacity within established lower density single-family areas and not along the transit corridors.

The City worked with the community to identify locations that would support compact, pedestrian-friendly mixed-use village centers linked by transit and developed community-specific policies that support infill development. The CPUs included examining existing and future market conditions for land uses and housing types to make sure that the community plans would encourage public and private investment into the community. The existing public facilities and infrastructure were studied to determine the types and amount of additional investment that will be needed in order to support the future planned growth in a sustainable manner. For example, rather than increasing roadway capacity, the CPUs evaluated developing measures to reduce congestion through improving alternative modes of transportation. Additionally, the proposed zoning used appropriate citywide zones by replacing the existing planned district ordinances (PDOs) with citywide base zones which allow for mixed-use, higher density development, consistent with the proposed community plan land-use designations. Furthermore, the proposed CPIOZ would implement design standards that ensure new development is designed, sited, and oriented to promote walkability and bicycling.

C. Project Description and Objectives

The Project analyzed in this PEIR is an update to the existing Southeastern San Diego Community Plan. The existing SESD Community Plan, which includes both the Southeastern San Diego and Encanto Neighborhood planning areas, was originally adopted in 1969 and comprehensively updated in 1987. As part of the update effort, the community plan area has been split into two planning areas: the Southeastern San Diego and Encanto Neighborhoods communities. To enable greater focus on each community, separate community plans are being prepared for each community through the update process. The update will ensure consistency of the CPUs with and incorporate relevant policies from the City of San Diego General Plan (General Plan), as well as provide a long-range, comprehensive policy framework for growth and development in the two communities through 2035.

Included in the CPUs are two village districts located within the community plan areas; amendments to the General Plan to incorporate the updated community plans, providing site-specific policies; amendments to the Land Development Code for adoption of a rezone and Community Plan Implementation Overlay Zone (CPIOZ), rescission of two Planned District Ordinances (PDO's), and a comprehensive update to the existing Public Facilities Financing Plan resulting in new IFS for each plan area. These plans and actions together with the CPUs form the Project for this EIR.

The CPUs would provide a mix of uses and development intensity that supports transit use within the designated Village Districts, while promoting transit-oriented-development, identifying the provision of additional public services and facilities in accordance with City standards, and maintaining and enhancing the character of single-family areas over the next 20 to 30 years. The land use elements of the CPUs define Village Districts and key corridors where future growth is targeted within both communities in order to fulfill the General Plan's City of Villages strategy.

While the CPUs set forth procedures for implementation, they do not on their own establish regulations or legislation, nor do they, on their own, rezone property. Controls on development and use of public and private property including zoning, the creation of a CPIOZ, design controls, and implementation of transportation improvements are included as part of the plan implementation program, and are considered part of the CPUs studied here.

The CPUs are components of the City's General Plan, as they further complement the General Plan policies in the proposed CPU areas through the provision of more site-specific recommendations that implement goals and policies contained within the 10 elements of the General Plan. Each of the proposed CPUs contains nine elements and an implementation chapter. The elements are as follows: Land Use; Mobility; Urban Design; Economic Prosperity; Public Facilities, Services, and Safety; Recreation; Conservation and Sustainability; Historic Preservation; and Arts and Culture.

A number of studies have been considered in the development of the CPUs, including planning and land use documents, master plans, and technical documents addressing a range of issues. The CPUs are also intended to ensure consistency with the overall guiding principles, land use policies, and other goals found in the City's General Plan.

Project Objectives

The CEQA Guidelines §15124(b) require a description of project's purpose and objectives. The following specific objectives for the Project support the underlying purpose of the Project, assist the City as Lead Agency in developing a reasonable range of alternatives to evaluate in this PEIR, and will ultimately aid the Lead Agency in preparing findings and overriding considerations, if necessary. The following primary goals, recommendations, and objectives of the CPUs are to:

- **Multi-Modal Transportation Strategy**: Include walkable and bicycle friendly streets, accessible and enhanced transit options, and comprehensive parking strategies throughout both communities.
- **Economic Diversification**: Broaden the economic profile to increase employment and growth opportunities.
- **Housing**: Increase allowed densities in close proximity to transit in order to provide more and varied housing and meet workforce needs close to employment centers.
- **Complete Places**: Create balanced, integrated mix of uses in Southeastern San Diego and Encanto Neighborhoods while minimizing collocation compatibility issues.
- **Transit**: Coordinate land use planning with high frequency transit service planning.
- **Open Space**: Protect the canyon lands and sensitive biological resources while providing recreational opportunities.
- **Infrastructure**: Include financing mechanisms designed to secure infrastructure improvements concurrent with large development.
- **Environmental Leadership and Sustainability**: Follow environmentally sensitive design and sustainable development practices.
- **Streamline Permit Processing**: Ensure a less costly and time-intensive process within the identified Village Districts. Incorporate specific incentives in the Encanto Neighborhoods Village District to achieve transit-supportive densities within a ¼ mile of the transit stations.

The above objectives are specific to the Southeastern San Diego and Encanto Neighborhoods planning areas, and are intended to implement the broader goals, policies, and Guiding Principles of the General Plan, such as:

- An open space network formed by parks, canyons, river valleys, habitats, beaches and ocean;
- Diverse residential communities formed by the open space network;
- Compact walkable mixed-use villages of different scales within communities;
- Employment centers for a strong economy;
- An integrated regional transportation network of walkways, bikeways, transit, roadways, and freeways that efficiently link communities and villages to each other and to employment centers;
- High-quality, affordable, and well-maintained public facilities to serve the City's population, workers, and visitors;
- Historic districts and sites that respect our heritage;

- Balanced communities that offer opportunities for all San Diegans and share citywide responsibilities;
- A clean and sustainable environment; and
- A high aesthetic standard.

III. SUMMARY OF IMPACTS

As described in Section 3.0 of the FEIR, the Project is a comprehensive update to the adopted 1987 SESD Community Plan. The Project is also a component of the City's General Plan as it provides more site-specific recommendations that implement the goals and policies of the General Plan in the CPU areas. As such, the CPUs set forth procedures for implementation and provide goals and policies for future development within the portion of the CPU areas under the City's jurisdiction.

Controls on development and use of public and private property including zoning, design controls, and implementation of transportation improvements are included as part of the CPU implementation program.

The FEIR concludes that the CPUs will have **no significant impacts** and require no mitigation measures with respect to the following issue areas:

- Land Use
  - Land Use Plan Conflict
  - Land Use Compatibility with Airport Land Use Compatibility Plan
- Transportation
  - Circulation and Access
  - Alternative Transportation
- Air Quality
  - Air Movement
- Hydrology and Water Quality
  - Regional Water Quality
  - Flooding
- Geology and Seismic Hazards
  - Unstable Geological Units or Soils
- Hazardous Materials
  - Sensitive Receptors

  - Hazardous Materials Sites
  - Emergency Response or Evacuation Plan
  - Wildland Fires
  - Hazardous Emissions or Materials near Schools
  - Airport Influence Area
- Greenhouse Gas Emissions
  - Greenhouse Gas Emissions
  - Consistency with Adopted Plans, Policies, and Regulations
- Energy
  - Electrical Power
  - Fuel
- Public Services and Facilities
  - Police, Parks and Recreation, Fire/Safety, Libraries, Schools, Public Facilities
- Public Utilities
  - Natural Gas, Water, Sewer, Communication Systems, Solid Waste Management
  - Water Use
- Visual Effects and Neighborhood Character
  - Alteration to Existing or Planned Character
  - Landform Alteration
  - Light or Glare

Potentially **significant impacts of the CPUs will be mitigated** to below a level of significance with respect to the following issue areas:

- Land Use
  - Environmentally Sensitive Lands and Historical Resources Regulations
  - Multiple Species Conservation Program (MSCP)/Multi-Habitat Planning Area (MHPA)
- Air Quality
  - Sensitive Receptors
- Noise
  - Noise Abatement and Control Ordinance
- Biological Resources
  - Sensitive Plant and Wildlife Species
  - Wetlands
  - Migratory Wildlife

  - MSCP
  - MHPA
- Hydrology and Water Quality
  - Water Quality
  - Runoff
  - Pollutant Discharges
- Historical Resources
  - Prehistoric/Historical Sites
  - Religious or Sacred Uses and Human Remains
- Paleontological Resources
  - Paleontological Resources
- Geology and Seismic Hazards
  - Geologic Hazards
  - Erosion

No feasible mitigation measures are available to reduce impacts to below a level of significance for the following issue areas:

- Transportation
  - Capacity of the Street System
  - Freeway Traffic
  - Existing or Planned Transportation System
- Air Quality
  - Air Quality Plan
  - Ozone
- Noise
  - Transportation Noise
  - Ambient Noise

IV. FINDINGS REGARDING SIGNIFICANT IMPACTS

A. Findings Regarding Impacts That Will be Mitigated to Below a Level of Significance (CEQA §21081(a)(1) and CEQA Guidelines §15091(a)(1)

The City, having independently reviewed and considered the information contained in the FEIR and the public record for the Project, finds, pursuant to Public Resource Code §21081(a)(1) and State CEQA Guidelines §15091(a)(1), that changes or alterations have been required in, or incorporated into, the Project which would mitigate or avoid the significant effects on the environment related to:

- Land Use (Issues 2 and 3)
- Air Quality (Issue 3)
- Noise (Issue 3)
- Biological Resources (Issues 1-5)
- Hydrology and Water Quality (Issues 1-3)
- Historical Resources (Issues 1 and 2)
- Paleontological Resources (Issue 1)
- Geology and Seismic Hazards (Issues 1 and 2)

Land Use (Regulation Consistency – Environmentally Sensitive Lands [ESL] and Historical Resources Regulations)

Significant Effect

Environmentally Sensitive Lands

A potentially significant impact could result from a conflict with the purpose and intent of the City's ESL Regulations, as the development footprint of the CPUs would encroach into sensitive ESL areas.

Historical Resources Regulations

A potentially significant impact could result from a conflict with the purpose and intent of the City's Historical Resources Regulations. Given the presence of historical resources distributed throughout the CPU areas, implementation of the CPUs has the potential to result in significant impacts to historical resources.

Facts in Support of Finding

Environmentally Sensitive Lands

The potentially significant impact would be mitigated to below a level of significance with implementation of the Mitigation Framework measure. Framework LU-1a identified in Section 5.1 of the FEIR. Implementation of the Mitigation Framework would require that future development project types that are consistent with the CPUs and base zone regulations can be processed ministerially and would not

be subject to further environmental review under CEQA. Future public and private development proposals subject to discretionary review would be reviewed in accordance with Mitigation Framework measures LU-2 and BIO 1-3. Mitigation Framework measure LU-2 requires that development projects within or adjacent to designated Multi-Habitat Planning Area (MHPA) shall comply with the Land Use Adjacency Guidelines of the Multiple Species Conservation Plan (MSCP) in terms of land use, drainage, access, toxic substances in runoff, lighting, noise, invasive plant species, grading, and brush management requirements. Mitigation Framework measure BIO-1 requires that where sensitive biological resources are known or suspected on or adjacent to a proposed project site, a biological assessment shall be conducted, and design specifications shall be incorporated to minimize or eliminate direct impacts on sensitive plant and wildlife species. Mitigation Framework measure BIO-2 requires that projects comply with ACOE Clean Water Act (CWA) Section 404 requirements and special conditions, RWQCB in accordance with CWA and City of San Diego ESL Regulations for minimizing impacts on wetlands. Mitigation Framework measure BIO-3 requires that any project that would interfere with the nesting, foraging, or movement of wildlife species shall be identified in a site-specific biological resources report prepared in accordance with City of San Diego Biology Guidelines. The CPUs also include several policies which aim to reduce impacts to sensitive and other resources covered under the ESL regulations.

Historical Resources Regulations

Potentially significant impacts would be mitigated to below a level of significance with implementation of Mitigation Framework measure LU-1b (Historical Resources – Built Environment) identified in Section 5.1 of the FEIR. Implementation of this Mitigation Framework measure would require that future development proposals that do not comply with the CPIOZ Type A for Sherman Heights and Grant Hill Park Historic Districts shall be subject to discretionary review in accordance with the Mitigation Framework MM-HIST-2 in Section 5.7 Historical Resources. This measure requires that any development project that could directly affect historic built environment resources, the City shall require the evaluation of buildings over 45 years of age prior to permit issuance; determination if such building is historically significant and/or is eligible for local designation; and documentation in a historical resources report prepared in accordance with the Historical Resources Guidelines. The report shall include recommendations for redesign to avoid the resource and/or other appropriate mitigation requirements. However, if a historically significant resource cannot be entirely avoided, all prudent and feasible measures to minimize harm to the resource shall be taken, including but not limited to: preparing a historic resource management plan; designing 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); repairing damage according to the Secretary of the Interior's Standards for Rehabilitation; screening incompatible new construction from view through the use of berms, walls, and landscaping in keeping with the historic period and character of the resource; and shielding historic properties from noise generators through the use of sound walls, double glazing, and air conditioning.

. Future development project types that are consistent with the CPU, base zone regulations, and the supplemental regulations for CPIOZ Type A for Sherman Heights and Grant Hill Park Historic Districts, and can demonstrate compliance with the Sherman Heights and Grant Hill Park Historic Districts Design Criteria Guidelines and/or that no historical resources (Built Environment) are present on the project site or would not be adversely affected can be processed ministerially and would not be subject to further environmental review under CEQA. Future development projects implemented in accordance with the CPUs have a potential to impact known or unknown Historical Resources (Archaeology) and would be

subject to review in accordance with the Historical Resources Regulations and Guidelines as further described in Mitigation Framework measure MM-HIST-1.

Rationale and Conclusion

Environmentally Sensitive Lands

Mitigation Framework measure LU-1a assures that future development project types that are consistent with the CPUs, and base zone regulations, and can demonstrate that there are no biological resources present on the project site can be processed ministerially and would not be subject to further environmental review under CEQA. Future development proposals subject to discretionary review shall be reviewed in accordance with Mitigation Framework measures LU-2 and BIO 1 through BIO-3. This mitigation framework would reduce potentially significant land use (regulatory compliance) impacts to below a level of significance.

Implementation of this mitigation framework would be assured through incorporation into the CPUs' MMRP.

Historical Resources Regulations

Mitigation Framework measure LU-1b assures that future development project types that are consistent with the CPUs, base zone regulations, and the supplemental regulations for CPIOZ Type A for Sherman Heights and Grant Hill Park Historic Districts and can demonstrate compliance with the Sherman Heights and Grant Hill Park Historic Districts Design Criteria Guidelines and/or that there are no historic built environment resources present on the project site or would not be adversely affected, can be processed ministerially and would not be subject to further environmental review under CEQA. Development proposals that do not comply with the CPIOZ Type A for Sherman Heights and Grant Hill Park Historic Districts shall be subject to discretionary review in accordance with the Mitigation Framework measure MM-HIST-2 in Section 5.7 Historical Resources. Future projects implemented in accordance with the CPU's have a potential to impact known or unknown Historical Resources (Archaeology) and would be subject to review in accordance with the Historical Resources Regulations and Guidelines as further described in Mitigation Framework measure MM-HIST-1. These mitigation framework measures would reduce potentially significant land use (regulatory compliance) impacts to below a level of significance.

Implementation of this mitigation framework would be assured through incorporation into the CPUs' MMRP.

Land Use (MSCP/MHPA)

Significant Effect

Implementation of the CPUs could result in a conflict with the provision of the City's Multiple Species Conservation Program (MSCP) Subarea Plan and the MHPA or approved local, regional, or state habitat conservation plan. The MHPA is mapped within the Encanto Neighborhoods CPU and the plan contains specific policies that require future projects to implement the ESL Regulations, the City's Biology Guidelines, and the MSCP Subarea Plan, including the MHPA Land Use Adjacency Guidelines to reduce impacts on biological resources, open space, land form, or other environmentally sensitive areas (P-CS-12. P-CS-14, P-CS-19). Future development located within or adjacent to the MHPA has the potential to conflict with the MSCP Subarea in the Encanto Neighborhoods CPU area. No MHPA is mapped within

the SESD CPU area; therefore, no conflicts with the MHPA are anticipated to occur in the SESD CPU area.

Facts in Support of Finding

The potentially significant impact would be mitigated to below a level of significance with implementation of the Mitigation Framework measure LU-2 identified in Section 5.1 of the FEIR. Implementation of this Mitigation Framework measure would require that all subsequent development projects implemented in accordance with the CPUs that are within or adjacent to designated MHPA areas shall comply with the Land Use Adjacency Guidelines of the MSCP in terms of land use, drainage, access, toxic substances in runoff, lighting, noise, invasive plant species, grading, and brush management requirements. Mitigation measures include, but are not limited to: sufficient buffers and design features, barriers (rocks, boulders, signage, fencing, and appropriate vegetation) where necessary, lighting directed away from the MHPA, and berms or walls adjacent to commercial or industrial areas and any other use that may introduce construction noise or noise from future development that could impact or interfere with wildlife utilization of the MHPA. The project biologist for each proposed project would identify specific mitigation measures needed to reduce impacts to below a level of significance. Subsequent environmental review would be required to determine the significance of impacts from land use adjacency and compliance with the Land Use Adjacency Guidelines of the MSCP. Prior to approval of any subsequent development project in an area adjacent to a designated MHPA, the City of San Diego shall identify specific conditions of approval in order to avoid or to reduce potential impacts to adjacent the MHPA.

Rationale and Conclusion

Mitigation Framework measure LU-2 assures that future projects within or adjacent to the MHPA comply with the Land Use Adjacency Guidelines of the MSCP in terms of land use, drainage, access, toxic substances in runoff, lighting, noise, invasive plant species, grading, and brush management requirements. This Mitigation Framework measure would reduce potentially significant land use (regulatory compliance) impacts to below a level of significance.

Implementation of this mitigation framework would be assured through incorporation into the CPUs' MMRP.

Air Quality (Sensitive Receptors)

Significant Effect

Stationary Sources

The SESD CPU includes light industrial uses which could generate air pollutants. Without appropriate controls, air emissions associated with planned industrial uses would represent a significant adverse air quality impact.

Collocation

The SESD CPU contains several areas where residential and other sensitive uses would be placed adjacent to light industrial or commercial uses. It is possible that industries that generate air pollutants would be developed at these locations.

Facts in Support of Finding

Stationary Sources

The potentially significant impact would be mitigated to below a level of significance with implementation of the Mitigation Framework measure AQ-3 identified in Section 5.3 of the FEIR. Implementation of this Mitigation Framework measure would require that prior to the issuance of building permits for any new facility that would have the potential to emit toxic air contaminants, in accordance with AB 2588, an emissions inventory and health risk assessment shall be prepared. If adverse health impacts exceeding public notification levels (cancer risk equal to or greater than 10 in 1,000,000) are identified, the facility shall provide public notice to residents located within the public notification area and submit a risk reduction audit and plan to the APCD that demonstrates how the facility would reduce health risks to less than significant levels within five years of the date the plan.

Collocation

The potentially significant impact would be mitigated to below a level of significance with implementation of the Mitigation Framework measure AQ-4 identified in Section 5.3 of the FEIR. Implementation of this Mitigation Framework measure would require that prior to the issuance of building permits for any project containing a facility identified in Table 5.3-3 of the FEIR, or locating air quality sensitive receptors closer than the recommended buffer distances, future projects implemented in accordance with the CPUs shall be required to prepare a health risk assessment (HRA) with a Tier I analysis in accordance with APCD HRA Guidelines and the Office of Environmental Health Hazard Assessment (OEHHA) Air Toxics "Hot Spots" Program Risk Assessment Guidelines (APCD 2006; OEHHA 2003).

Rationale and Conclusion

Stationary Sources

Mitigation Framework measure AQ-3 assures that project-level review must demonstrate that health risks would be below a level of significance for all future projects. This Mitigation Framework measure would reduce potentially significant air quality impacts to below a level of significance.

Implementation of this mitigation framework would be assured through incorporation into the CPUs' MMRP.

Collocation

Mitigation Framework measure AQ-3 assures that project-level review must demonstrate that health risks would be below a level of significance for all future projects. This Mitigation Framework measure would reduce potentially significant air quality impacts to below a level of significance.

Implementation of this mitigation framework would be assured through incorporation into the CPUs' MMRP.

Noise (Noise Abatement and Control Ordinance)

Significant Effect

Implementation of the CPUs would result in the exposure of people to noise levels which exceed standards established in the Noise Abatement and Control Ordinance.

Facts in Support of Finding

The potentially significant impact would be mitigated to below a level of significance with implementation of the Mitigation Framework measures NOS-3 and NOS-4 identified in Section 5.4 of the FEIR. Implementation of these Mitigation Framework measures would require that prior to the issuance of a building permit, a site-specific acoustical/noise analysis of any on-site generated noise sources, including generators, mechanical equipment, and trucks, shall be prepared which identifies all noise-generating equipment, predicts noise levels at property lines from all identified equipment, and recommends mitigation to be implemented (e.g., enclosures, barriers, site orientation), to ensure compliance with the City's Noise Abatement and Control Ordinance. Noise reduction measures shall include building noise-attenuating walls, reducing noise at the source by requiring quieter machinery or limiting the hours of operation, or other attenuation measures. Additionally, future projects shall be required to buffer sensitive receptors from noise sources through the use of open space and other separation techniques as recommended after thorough analysis by a qualified acoustical engineer. Exact noise mitigation measures and their effectiveness shall be determined by the site specific noise analyses.

It would also require that for projects that exceed daily construction noise thresholds established by the City of San Diego, best construction management practices shall be used to reduce construction noise levels to comply with standards established by the Municipal Code in Chapter 5, Article 9.5, Noise Abatement and Control. The project applicant shall prepare and implement a Construction Noise Management Plan. Appropriate management practices shall be determined on a project-by-project basis, and are specific to the location.

Rationale and Conclusion

Mitigation Framework measures NOS-3 and NOS-4 assures that future development proposals implemented in accordance with the CPUs would be required to incorporate feasible mitigation measures and alternatives adopted in conjunction with the certification of the PEIR. With adherence to the mitigation measures NOS-3 and NOS-4, the program-level impact related to stationary and construction noise impacts to residential uses and sensitive receptors would be reduced to below a level of significance.

Implementation of this mitigation framework would be assured through incorporation into the CPUs' MMRP.

Biological Resources (Sensitive Plant and Wildlife Species)

Significant Effect

Implementation of the CPUs could have an adverse effect on sensitive plant and wildlife species.

Facts in Support of Finding

All impacts on sensitive biological resources shall be avoided to the maximum extent feasible and minimized when avoidance is not possible. Where impacts are not avoidable or cannot be minimized, mitigation shall be required to reduce significant impacts to levels that are less than significant. Mitigation measures typically employed include resource avoidance, restoration, or creation of habitat, dedication, or acquisition of habitat, or payment into the City of San Diego's Habitat Acquisition Fund or other City-approved mitigation bank.

The potentially significant impact would be mitigated to below a level of significance with implementation of the Mitigation Framework measure BIO-1 identified in Section 5.5 of the FEIR. Implementation of this Mitigation Framework measure would require that any future project which could have a potentially significant impact resulting in a reduction in the number of unique, rare, endangered, sensitive, or fully protected species of plants or animals, shall be analyzed in accordance with the CEQA Significance Thresholds, which require that site-specific biological resources surveys be conducted in accordance with City of San Diego Biology Guidelines (2012) and MSCP Subarea Plan. Where sensitive biological resources are known or suspected on or adjacent to a proposed project site, a biological assessment shall be performed for that project. Based on available habitat within the CPU areas, focused presence/absence surveys shall be conducted in accordance with the Biology Guidelines and applicable resource agency survey protocols. Engineering design specifications based on project-level grading and site plans shall be incorporated into the design of future projects to minimize or eliminate direct impacts on sensitive plant and wildlife species consistent with the FESA, MBTA, CESA, MSCP Subarea Plan, and ESL Regulations.

<u>Mitigation for Impacts on Sensitive Upland Habitats</u>

Future projects implemented in accordance with the CPUs resulting in impacts on sensitive upland Tier I, II, IIIA, or IIIB habitats shall implement avoidance and minimization measures consistent with the City Biology Guidelines and MSCP Subarea Plan and provide suitable mitigation in accordance with Table 3 in the City's Biology Guidelines and MSCP Subarea Plan. Future project-level grading and site plans shall incorporate project design features to minimize direct impacts on sensitive vegetation communities including but not limited to riparian habitats, wetlands, maritime succulent scrub, coastal sage scrub, and grasslands consistent with federal, state, and City guidelines. Any required mitigation for impacts on sensitive vegetation communities shall be outlined in a conceptual mitigation plan following the outline provided in the City Biology Guidelines.

Mitigation for impacts on sensitive vegetation communities shall be implemented at the time future development projects are proposed. Project-level analysis shall determine whether the impacts are within or outside the MHPA. Any MHPA boundary adjustments shall be processed by the individual project applicants through the City and Wildlife Agencies during the early project planning stage.

Mitigation for impacts on sensitive upland habitats shall occur in accordance with the MSCP mitigation ratios as specified within the City's Biology Guidelines (City of San Diego 2012). These mitigation ratios are based on the tier level of the vegetation community, the location of the impact, and the location of the mitigation site(s). For example, impacts on lands inside the MHPA and mitigated outside the MHPA would have the highest mitigation ratio, whereas impacts on lands outside the MHPA and mitigated inside the MHPA would have the lowest mitigation ratio.

Mitigation for Impacts to Wetlands

Potentially significant impacts to wetlands would be mitigated through implementation of the Mitigation Framework measure found in BIO-2.

Mitigation for Short-term Impacts on Sensitive Species from Project Construction

Additional specific measures necessary for reducing potential indirect impacts on sensitive bird species, including coastal California gnatcatcher, least Bell's vireo, and coastal cactus wren, are further detailed in Mitigation Framework measures LU-2 and BIO-3. (The details pertaining to LU-2 are discussed above under *Land Use (MHPA Land Use Adjacency Guidelines*).

Rationale and Conclusion

Mitigation Framework measure BIO-1 assures that future development requires site-specific environmental review, analysis of potential impacts on biological resources, and recommendations for mitigation. This Mitigation Framework measure would reduce potentially significant impacts to sensitive plant and wildlife species to below a level of significance.

Implementation of this mitigation framework would be assured through incorporation into the CPUs' MMRP.

Biological Resources (Wetlands)

Significant Effect

Implementation of the CPUs could have an adverse effect on wetlands. Potential impacts on wetland vegetation communities would include the loss of southern cottonwood-willow riparian forest, southern riparian scrub, mule fat scrub, and non-native riparian.

Facts in Support of Finding

The potentially significant impact would be mitigated to below a level of significance with implementation of the Mitigation Framework measure BIO-2 identified in Section 5.5 of the FEIR. Implementation of this Mitigation Framework measure would require that all subsequent projects developed in accordance with the CPUs shall be required to comply with ACOE CWA Section 404 requirements and special conditions, RWQCB in accordance with Section 401 of the CWA, CDFW Section 1602 Streambed Alteration Agreement requirements and special conditions, and the City of San Diego ESL Regulations for minimizing impacts on wetlands.

Prior to obtaining discretionary permits for future actions implemented in accordance with the CPUs that are subject to ESL, and/or where the CEQA review has determined that there may be a significant impact on other biological resources considered sensitive under CEQA, a site-specific biological resources survey shall be completed in accordance with City of San Diego Biology Guidelines. In addition, a preliminary or final jurisdictional waters/wetlands delineation of the project site shall be completed. A determination of the presence/absence and boundaries of any waters of the U.S. and waters of the state shall also be completed. The limits of any riparian habitats on-site under the sole jurisdiction of CDFW shall also be delineated, as well as any special aquatic sites (excluding vernal pools) that may not meet

federal jurisdictional criteria but are regulated by the RWQCB. Engineering design specifications based on project-level grading and site plans shall be incorporated into the project design to minimize direct impacts to wetlands, jurisdictional waters, riparian habitats, and vernal pools consistent with federal, state, and City guidelines.

Additionally, any impacts on wetlands in the City of San Diego would require a deviation from the ESL wetland regulations. Under the wetland deviation process, development proposals that have wetland impacts shall be considered only pursuant to one of three options: Essential Public Project, Economic Viability Option, or Biologically Superior Option. ESL Regulations require that impacts on wetlands be avoided. Unavoidable impacts on wetlands shall be minimized to the maximum extent practicable and mitigated as follows:

- As part of the project-specific environmental review pursuant to CEQA, all unavoidable wetland impacts shall be analyzed, and mitigation shall be required in accordance with ratios shown in Tables 5.5-5a and 5.5-5b in the FEIR. Mitigation shall be based on the impacted type of wetland and project design. Mitigation shall prevent any net loss of wetland functions and values of the impacted wetland.
- For the Biologically Superior Option, the project shall include avoidance, minimization, and compensatory measures, which would result in a biologically superior net gain in overall function and values of (a) the type of wetland resource being impacted and/or (b) the biological resources to be conserved.

As part of any future project-specific environmental review pursuant to CEQA, all unavoidable wetlands impacts (both temporary and permanent) shall be analyzed and mitigation required in accordance with the City Biology Guidelines; mitigation shall be based on the impacted type of wetland habitat. Mitigation shall prevent any net loss of wetland functions and values of the impacted wetland. The four types of activities that constitute wetland mitigation under the ESL Regulations are wetland creation, wetland restoration, wetland enhancement, and wetland acquisition.

For permanent wetland impacts that are unavoidable and minimized to the maximum extent feasible, mitigation shall consist of creation of new in-kind habitat to the fullest extent possible and at the appropriate ratios. If on-site mitigation is not feasible, then at least a portion of the mitigation must occur within the same watershed.

Rationale and Conclusion

Implementation of the Mitigation Framework measure detailed in BIO-2, which requires compliance with the ESL Regulations, MSCP Subarea Plan, and the City's Biology Guidelines, would serve to reduce impacts on wetlands, vernal pools, and other jurisdictional water resources at the program level. This Mitigation Framework measure would reduce potentially significant impacts to wetlands to below a level of significance.

Implementation of this mitigation framework would be assured through incorporation into the CPUs' MMRP.

Biological Resources (Migratory Wildlife)

Significant Effect

Buildout in accordance with the CPUs has the potential to impact active nests of raptors or migratory bird species.

Facts in Support of Finding

The potentially significant impact would be mitigated to below a level of significance with implementation of the Mitigation Framework measure BIO-3 identified under Section 5.5 of the FEIR. Implementation of this Mitigation Framework measure would require that mitigation for future projects to reduce potentially significant impacts that would interfere with the nesting, foraging, or movement of wildlife species within the CPU areas shall be identified in site-specific biological resources report prepared in accordance with City of San Diego Biology Guidelines, as further detailed in BIO-1, during the discretionary review process. The biology report shall include results of protocol surveys and recommendations for additional measures to be implemented during construction-related activities; shall identify the limits of any identified local-scale wildlife corridors or habitat linkages and analyze potential impacts in relation to local fauna, and the effects of conversion of vegetation communities to minimize direct impacts on sensitive wildlife species and to provide for continued wildlife movement through the corridor.

Measures that shall be incorporated into project-level construction documents to minimize direct impacts on wildlife movement, nesting, or foraging activities shall be addressed in the biology report and shall include recommendations for preconstruction protocol surveys to be conducted during established breeding seasons, construction noise monitoring and implementation of any species-specific mitigation plans in order to comply with the FESA, MBTA, State Fish and Game Code, and/or the ESL Regulations.

Rationale and Conclusion

Mitigation Framework measure BIO-3 would assure that future development implemented in accordance with the CPUs would be able to mitigate impacts to migratory wildlife. This Mitigation Framework measure would reduce potentially significant impacts to biological resources (migratory wildlife) to below a level of significance.

Implementation of this mitigation framework would be assured through incorporation into the CPUs' MMRP.

Biological Resources (MSCP)

Significant Effect

Adoption of the CPUs will likely lead to subsequent projects that would have the potential to result in temporary and permanent impacts on sensitive vegetation communities as identified by the MSCP.

Facts in Support of Finding

The potentially significant impact would be mitigated to below a level of significance with implementation of the Mitigation Framework measures BIO-1 and LU-2 as described above.

Rationale and Conclusion

Mitigation Framework measures BIO-1 and LU-2 would assure that future development implemented in accordance with the CPUs would serve to reduce impacts on MSCP covered species to below a level of significance at the program level. .

Implementation of this mitigation framework would be assured through incorporation into the CPUs' MMRP.

Biological Resources (MHPA)

Significant Effect

Implementation of the CPUs could introduce land uses within an area that could have a potential indirect effect on the City's MHPA in the Encanto Neighborhoods CPU area. No MHPA is mapped within the SESD CPU area; therefore, no edge effects to MHPA are anticipated to occur in the SESD CPU area.

Facts in Support of Finding

The potentially significant impact would be mitigated to below a level of significance with implementation of Mitigation Framework measure LU-2, detailed in Section 5.1 of the FEIR. Implementation of Mitigation Framework measure LU-2 would require that MHPA Land Use Adjacency impacts be addressed at the project-level.

Rationale and Conclusion

Mitigation Framework measure LU-2 assures that future projects located adjacent to the MHPA would comply with the Land Use Adjacency Guidelines of the MSCP in terms of land use, drainage, access, toxic substances in runoff, lighting, noise, invasive plant species, grading, and brush management requirements. This Mitigation Framework measure would reduce potentially significant land use (regulatory compliance) impacts to below a level of significance.

Implementation of this mitigation framework would be assured through incorporation into the CPUs' MMRP.

Hydrology and Water Quality (Water Quality)

Significant Effect

Future projects constructed during buildout of the CPUs could result in impacts to water quality. Therefore, implementation of the CPUs has the potential to result in significant direct and indirect impacts associated with water quality.

Facts in Support of Finding

The potentially significant impact would be mitigated to below a level of significance with implementation of the Mitigation Framework measure HYD/WQ-1 identified in Section 5.6 of the FEIR. Implementation of this Mitigation Framework measure would require that prior to approval of development projects implemented in accordance with the CPUs, the applicant shall demonstrate to the

satisfaction of the City Engineer, based on the project application, that future projects are sited and designed to minimize impacts on absorption rates, drainage patterns, and surface runoff rates and floodwaters in accordance with current City and San Diego RWQCB regulations. Future design of projects shall incorporate all applicable and practicable measures in accordance with the RWQCB, the City Storm Water Runoff and Drainage Regulations (Chapter 14, Article 2, Division 2 of the Land Development Code [LDC]), and the LDC, and shall be based on the recommendations of a detailed water quality and hydraulic analysis.

Rationale and Conclusion

Mitigation Framework measure HYD-WQ-1 assures that future projects reduce potential impacts to downstream resources. This Mitigation Framework measure would reduce potentially significant impacts to water quality to below a level of significance.

Implementation of this mitigation framework would be assured through incorporation into the CPUs' MMRP.

Hydrology and water Quality (Runoff)

Significant Effect

Buildout in accordance with the CPUs would result in an increase in impervious surfaces and associated increased runoff, which could result in alterations to on- and off-site drainage. Therefore, implementation of the CPUs has the potential to result in significant direct and indirect impacts associated with increased runoff and alterations to on-and off-site drainage patterns.

Facts in Support of Finding

The potentially significant impact would be mitigated to below a level of significance with implementation of the Mitigation Framework measure HYD/WQ-1 as described above. Implementation of this Mitigation Framework measure would require that applicants shall demonstrate that future projects are sited and designed to minimize impacts on absorption rates, drainage patterns, and surface runoff rates and floodwaters in accordance with current City and San Diego RWQCB regulations.

Rationale and Conclusion

Mitigation Framework measure HYD/WQ-1 would assure that potential impacts to natural drainage systems and associated downstream resources would be reduced to below a level of significance.

Implementation of this mitigation framework would be assured through incorporation into the CPUs' MMRP.

Hydrology and Water Quality (Pollutant Discharge)

Significant Effect

There is a potential for implementation of the CPUs to result in increased pollutant discharges. Future projects constructed during buildout of the CPU could result in impacts to water quality, including discharges to surface or groundwater. The construction of such facilities and, to a

lesser degree, the operation of these facilities could impact water quality. Grading and exposed soil could result in sedimentation.

Facts in Support of Finding

The potentially significant impact would be mitigated to below a level of significance with implementation of the Mitigation Framework measure HYD/WQ-2 identified in Section 5.6 of the FEIR. Implementation of this Mitigation Framework measure would require that subsequent projects be sited and designed to minimize impacts on receiving waters, in particular the discharge of identified pollutants to an already impaired water body. Prior to approval of any entitlements for any future project, the City shall ensure that any impacts on receiving waters be precluded and, if necessary, mitigated in accordance with the requirements of the City's Storm Water Runoff and Drainage Regulations (Chapter 14, Article 2, Division 2 of the LDC) and other appropriate agencies (e.g., RWQCB). To prevent erosion, siltation, and transport of urban pollutants, all future projects shall be designed to incorporate any applicable storm water improvement, both off- and on-site, in accordance with the City of San Diego Stormwater Standards Manual. Future projects shall incorporate storm water improvements and water quality protection measures as determined by project-specific water quality reports

Rationale and Conclusion

These individual actions making up Mitigation Framework measure HYD/WQ-2 reiterate that future development implemented in accordance with the CPU would be subject to the requirements of the Storm Water Standards, which include design of new or improved systems to meet local and state regulatory requirements satisfactory to the City Engineer. Strict adherence to the Mitigation Framework measure detailed in HYD/WQ-2, which also requires regulatory compliance, would ensure that potential impacts related to discharges into surface or groundwater, alterations to surface or groundwater, increases in pollutant discharges (erosion), and downstream sedimentation would be reduced to below a level of significance. Implementation of this mitigation framework would be assured through incorporation into the CPUs' MMRP and through regulatory compliance.

Historical Resources (Prehistoric/Historical Sites)

Significant Effect

Implementation of the CPUs could result in an alteration of a prehistoric or historic building, structure, object or site.

Facts in Support of Finding

The potentially significant impact would be mitigated to below a level of significance with implementation of the Mitigation Framework measure HIST-1 (Archaeological Resources) and HIST-2 (Historic Buildings, Structures, and Objects) identified in Section 5.7 of the FEIR. Implementation of this Mitigation Framework measure would require site-specific review for future projects according to the City of San Diego's Historical Resources Regulations and Historical Resources Guidelines. Prior to

issuance of any permit for a future development project implemented in accordance with the CPU area that could directly affect an archaeological resource, the City shall require the following determinations: (1) the presence of archaeological resources and (2) the appropriate mitigation for any significant resources which may be impacted by a development activity.

Rationale and Conclusion

HIST-1 and HIST-2 would require that future projects implemented in accordance with the CPUs conduct site-specific surveys to identify any significant on-site cultural resources, and if such resources are found, that appropriate measures are taken in accordance with CEQA and the City's Historical Resources Regulations and Guidelines. This Mitigation Framework would reduce potentially significant impacts to historical resources (prehistoric/historic sites) to below a level of significance.

Implementation of this mitigation framework would be assured through incorporation into the CPUs' MMRP.

Historical Resources (Religious or Sacred Uses or Human Remains)

Significant Effect

Implementation of the CPUs could result in impacts on existing religious or sacred uses or the disturbance of human remains, including those interred outside of formal cemeteries. Although there are no known religious or sacred uses within the CPU areas, human remains have been encountered within the CPU areas, specifically related to the ethnohistoric village of Las Choyas, which has been identified as an area of concern for the local Native American community. This area of cultural sensitivity overlaps both CPUs, and as such, any impacts in this area from future development implemented in accordance with the CPUs would be considered significant.

Facts in Support of Finding

The Mitigation Framework for impacts to religious or sacred uses or disturbance of any human remains would be the same as outlined for Archaeological Resources. Please refer to Mitigation Framework measure HIST-1, discussed above and described in detail in Section 5.7.1 and 5.7.2 of the FEIR.

Rationale and Conclusion

HIST-1 would require that site-specific surveys be conducted to identify any significant on-site cultural resources for future projects implemented in accordance with the CPUs, and if such resources, including sacred sites, are found, that appropriate measures are taken in accordance with CEQA, the City's Historic Resources Regulations, and the Historical Resources Guidelines, which requires compliance with the California Public Resources Code (Section 50987.98) and State Health and Safety Code (Section 7050.5). In addition, subsequent projects which have a potential to impact Tribal Cultural Resources associated with the village of Las Choyas would be subject to the provisions of AB 52 and CEQA which requires tribal notification and consultation. This Mitigation Framework measure in combination with the requirements of CEQA would reduce potentially significant impacts to historical resources (religious or sacred sites or disturbance of any human remains) to below a level of significance.

Implementation of this mitigation framework would be assured through incorporation into the CPU's MMRP.

Paleontological Resources

Significant Effect

Construction-related grading or trenching activities associated with future projects implemented in accordance with the CPUs could have a potential impact on paleontological resources in a geologic deposit/formation/rock unit with a high or moderate sensitivity rating .

Facts in Support of Finding

The potentially significant impact would be mitigated to below a level of significance with implementation of the Mitigation Framework measure PALEO-1 identified in Section 5.8 of the FEIR. Implementation of this Mitigation Framework measure would require that prior to the approval of subsequent development projects implemented in accordance with the CPUs, the City shall determine the potential for impacts to paleontological resources based on review of the project application submitted, and recommendations of a project-level analysis that would identify where fossil resources could be affected during construction-related activities. Future projects shall be sited and designed to minimize impacts on paleontological resources in accordance with the City's Paleontological Resources Guidelines and CEQA Significance Thresholds. Monitoring for paleontological resources required during construction activities shall be implemented at the project-level and shall provide mitigation for the loss of important fossil resources with future subsequent development projects that are subject to environmental review.

Rationale and Conclusion

Future development implemented in accordance with the CPUs, subject to discretionary review would be required to implement Mitigation Framework measure PALEO-1. Therefore, the program-level impact related to paleontological resources would be reduced to below a level of significance.

Implementation of this mitigation framework would be assured through incorporation into the CPUs' MMRP.

Geology and Seismic Hazards (Geologic Hazards)

Significant Effect

Geologic hazards are present in the CPU areas. Implementation of the CPUs could expose people or structures to geologic hazards such as earthquakes, landslides, mudslides, and ground failure.

Facts in Support of Finding

The potentially significant impact would be mitigated to below a level of significance with implementation of Mitigation Framework measure GEO-1 identified in Section 5.9 of the FEIR. Implementation of this Mitigation Framework measure would require that impacts associated with geologic hazards shall be mitigated at the project-level through adherence to the City's Seismic Safety Study and recommendations of a site-specific geotechnical report prepared in accordance with the City's

Geotechnical Report Guidelines. Impacts shall also be avoided or reduced through engineering design that meets or exceeds adherence to the City's Municipal Code and the California Building Code.

Rationale and Conclusion

Future development implemented in accordance with the CPUs that would potentially result in impacts related to geologic hazards would be required to implement GEO-1. This Mitigation Framework measure reduces this program-level impact to below a level of significance.

Implementation of this mitigation framework would be assured through incorporation into the CPUs' MMRP.

Geology and Seismic Hazards (Erosion)

Significant Effect

Implementation of the CPUs would allow for the intensification of some land uses that could lead to construction and grading activities that could expose topsoil and increase soil erosion from water and wind.

Facts in Support of Finding

The potentially significant impact would be mitigated to below a level of significance with implementation of Mitigation Framework measure GEO-2 identified in Section 5.9 of the FEIR. Implementation of this Mitigation Framework measure would require individual projects to adhere to the Grading Regulation and NPDES permit requirements. All subsequent projects developed in accordance with the CPUs shall also adhere to the California Building Code to avoid or reduce geologic hazards to the satisfaction of the City Engineer.

Submittal, review, and approval of site specific geotechnical investigations shall be completed in accordance with the City's Municipal Code requirements. Engineering design specifications based on future project-level grading and site plans shall be incorporated into all future projects implemented in accordance with the CPUs to minimize hazards associated with site-level geologic and seismic conditions satisfactory to the City Engineer.

Conformance to mandated City grading requirements shall ensure that future grading and construction operations would avoid significant soil erosion impacts. Furthermore, any development involving clearing, grading, or excavation that causes soil disturbance of one or more acres, or any project involving less than one acre that is part of a larger development plan, shall be subject to NPDES General Construction Storm Water Permit provisions. Additionally, as noted above, any development of this sizewithin the City shall be required to prepare and comply with an approved Stormwater Pollution Prevention Plan (SWPPP) that shall consider the full range of erosion control BMPs such as, but not limited to, including any additional site-specific and seasonal conditions. Project compliance with NPDES requirements would significantly reduce the potential for substantial erosion or topsoil loss to occur in association with new development.

Prior to obtaining grading permits for future actions a site-specific geotechnical investigation shall be completed as necessary in accordance with the City of San Diego Guidelines for Preparing Geotechnical

Reports. Engineering design specifications based on project-level grading and site plans shall be incorporated into the project design to minimize hazards associated with site-level geologic and seismic conditions satisfactory to the City Engineer.

When required, the geologic technical report shall consist of a preliminary study, a geologic reconnaissance, or an in-depth geologic investigation report that includes field work and analysis. The geologic reconnaissance report and the geologic investigation report shall include all pertinent requirements as established by the Building Official.

In addition, the Building Official shall require a geologic reconnaissance report or a geologic investigation report for any site if the Building Official has reason to believe that a geologic hazard may exist at the site.

Rationale and Conclusion

Future development implemented in accordance with the CPUs that would potentially result in impacts related to erosion would be required to implement GEO-2. This Mitigation Framework measure reduces this program-level impact to below a level of significance.

Implementation of this mitigation framework would be assured through incorporation into the CPUs' MMRP.

B. Findings Regarding Mitigation Measures Which are the Responsibility of Another Agency (CEQA §21081(a)(2)) and CEQA Guidelines §15091(a)(2))

The City, having reviewed and considered the information contained in the Final EIR and the Record of Proceedings, finds pursuant to CEQA §21081(a)(2) and CEQA Guidelines §15091(a)(2) that there are changes or alterations which could reduce significant impacts that are within the responsibility and jurisdiction of another public agency.

Caltrans

Transportation (Freeway Traffic)

Implementation of the CPUs would potentially significantly impact 22 freeway segments, including six segments of I-5, two segments of I-15, two segments of I-805, and 12 segments of SR 94. The SANDAG 2050 Revenue Constrained Regional Transportation Plan (RTP) includes the improvements listed below on these segments.

- **Interstate 5 (I-5), between 17th Street and State Route 94 (SR-94); I-5, between SR-94 and Imperial Avenue; I-5, between Imperial Avenue and SR-75; I-5, between SR-75 and 28th Street; I-5, between 28th Street and I-15; and I-5, between I-15 and Main Street** – The SANDAG 2050 Revenue Constrained RTP includes operational improvements along I-5 between 17th Street and Main Street. These improvements are expected to be built by Year 2050.

- **I-15, between I-805 and SR-94; I-15, between Market Street and Ocean View Boulevard -** The SANDAG 2050 Revenue Constrained RTP includes construction of managed lanes along I-15 between I-805 and Ocean View Boulevard. These improvements are expected to be built by Year 2035.
- **I-805, between Market Street and Imperial Avenue; and I-805, between Imperial Avenue and 43rd Street** – The SANDAG 2050 Revenue Constrained RTP includes construction of managed lanes along I-805 between Market Street and 43rd Street. These improvements are expected to be built by Year 2030.
- **SR-94, between 17th Street and 25th Street; SR-94, between 25th Street and 28th Street; SR-94, between 28th Street and 30th Street; SR-94, between 30th Street and I-15; SR-94, between I-15 and Home Avenue; and SR-94, between Home Avenue and I-805** – The SANDAG 2050 Revenue Constrained RTP includes construction of managed lanes along SR-94 between 17th Street and I-805. These improvements are expected to be built by Year 2020.
- **SR-94, between I-805 and 47th Street; SR-94, between 47th Street and Euclid Avenue; SR-94, between Euclid Avenue and Kelton Road; SR-94, between Kelton Road and Federal Boulevard; SR-94, between Federal Boulevard and College Grove Way; and SR-94, between College Grove Way and College Avenue** – The SANDAG 2050 Revenue Constrained RTP includes construction of managed lanes along SR-94 between I-805 and College Avenue. These improvements are expected to be built by Year 2040.

There is some uncertainty related to the actual developments and associated traffic impacts that will materialize over time. Future development projects' transportation studies would be able to more accurately identify individual project-level impacts and provide the mechanism to mitigate them through fair share contributions in addition to the funding planned by SANDAG and other funding sources consistent with SANDAG Revenue Constrained RTP. Implementation of the SESD and Encanto Neighborhoods CPUs could significantly impact the freeway segments and future potential mitigations measures and fair share contribution should be further evaluated at the project level.

SANDAG

Air Quality (Air Quality Plan)

Implementation of the CPUs would result in a substantial adverse effect on the implementation of the applicable air quality plan.

As discussed in Section 5.3 of the FEIR, total emissions under the SESD CPU are projected to be greater than total emissions under the Adopted Community Plan for ROG. Thus, emissions of ROG would be greater than what is accounted for in adopted regional air quality improvement plans. Therefore, the SESD CPU would conflict with implementation of the San Diego Regional Air Quality Strategy (RAQS) and would have a potentially significant impact on regional air quality without mitigation.

Total emissions under the Encanto Neighborhoods CPU are projected to be greater than total emissions under the Adopted Community Plan for ROG, NO_x, and CO. Thus, emissions of these pollutants would be greater than what is accounted for in adopted regional air quality improvement plans. Therefore, the Encanto Neighborhoods CPU would conflict with implementation of the RAQS and would have a potentially significant impact on regional air quality unless mitigation was incorporated.

Because the significant air impact stems from an inconsistency between the SESD CPU and the adopted land use plans upon which the RAQS was based, the only measure that can lessen this effect is the revision of the RAQS and SIP based on the revised CPUs. This effort is the responsibility of SANDAG and the SDAPCD and is outside the jurisdiction of the City. As such, no mitigation is available to the City. Impacts remain significant and unavoidable.

C. Findings Regarding Infeasible Mitigation Measures and Alternatives (CEQA §21081(a)(3) and CEQA Guidelines §15091(a)(3))

Potentially Significant Impacts that cannot be Mitigated Below a level of Significance (Public Resource Code §21081(a)(1) and (3):

The Project would have significant unmitigable impacts in the following issue areas:

- Transportation (capacity of the street system, freeway traffic, and existing or planned transportation system)
- Air Quality (ozone)
- Noise (transportation noise, ambient noise)

Although mitigation measures are identified in the FEIR that could reduce significant impacts resulting from implementation of the proposed CPUs, implementation of mitigation measures cannot be assured since the degree of future impacts and applicability, feasibility, and success of future mitigation measures cannot be adequately known for each specific future project at the program level. In addition, funding cannot be assured to implement the mitigation measures which would partially reduce the significant program-level impacts arising from the proposed CPUs, implementing programs including zoning regulations, and the Impact Fee Studies associated with the stated issue areas. This finding is appropriate because there are no feasible mitigation measures available that would reduce the identified impacts to below a level of significance. “Feasible” is defined in Section 15364 of the CEQA Guidelines to mean “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors.” The CEQA statute (Section 21081) and Guidelines (Section 15019(a)(3)) also provide that “other” considerations may form the basis for a finding of infeasibility. Case law makes clear that a mitigation measure or alternative can be deemed infeasible on the basis of its failure to meet project objectives or on related public policy grounds.

Transportation (Capacity of the Street System)

Significant Effect

Implementation of the CPUs would result in an increase in projected traffic which is substantial in relation to the existing traffic load and capacity of the street system.

Facts in Support of Finding

Assuming the implementation of the proposed roadway diets and widening under the CPUs, 67 study area roadway segments are projected to operate at LOS E or F under buildout of the CPUs, including 38 roadway segments located within Southeastern San Diego, 22 roadway segments within Encanto Neighborhoods, three segments within both Southeastern San Diego and Encanto Neighborhoods, and four within the sphere of influence. Based on the criteria documented previously, the CPUs would have a significant impact to all sixty-seven (67) roadway segments, with the exception of Division Street, between Harbison Avenue and 58th Street.

At the program-level, impacts shall be reduced through the classifications of roadways and identification of necessary roadway, intersection and freeway improvements. Mitigation or construction of these improvements shall be carried out at the project-level via the Impact Fee Study (IFS), capital improvement program projects, future Caltrans projects, and future development projects. Funding shall be through construction by individual development projects, collection of development impact fees (DIFs), fair share contributions to be determined at the project-level, and potentially other sources, such as Local TransNet funds and Federal, State, and Regional grant funding programs.

The Traffic Impact Study (TIS) identified a series of potential roadway and intersection mitigation measures.

SOUTHEASTERN SAN DIEGO

5. Market Street, between 25th Street and 28th Street – Provide additional right-of-way and widen the roadway to a 4-lane Collector with a continuous left-turn lane.
6. Market Street, between 28th Street and 32nd Street – Provide additional right-of-way and widen the roadway to a 4-lane Collector with a continuous left-turn lane.
10. Market Street, between Boundary Street and I-805 SB Ramps – Provide additional right-of-way and widen the roadway to a 4-lane Collector with a continuous left-turn lane.
15. Imperial Avenue, between 17th Street and 19th Street - Provide additional right-of-way and widen the roadway to a 3-lane Collector with a continuous left-turn lane.
16. Imperial Avenue, between 19th Street and 25th Street - Provide additional right-of-way and widen to provide a continuous left-turn lane.
17. Imperial Avenue, between 25th Street and 28th Street - Provide additional right-of-way and widen to provide a continuous left-turn lane.
18. Imperial Avenue, between 28th Street and 30th Street - Provide additional right-of-way and widen to provide a continuous left-turn lane.
20. Imperial Avenue, between 32nd Street & 36th Street - Provide additional right-of-way and widen to provide a continuous left-turn lane.
21. Imperial Avenue, between 36th Street and 40th Street - Provide additional right-of-way and widen to provide a continuous left-turn lane.
37. Ocean View Boulevard, between 28th Street and 30th Street - Provide additional right-of-way and widen to provide a continuous left-turn lane.

39. Ocean View Boulevard, between 32nd Street and I-15 SB Ramps - Provide additional right-of-way and widen the roadway to a 4-lane Collector with a continuous left-turn lane.

41. Ocean View Boulevard, between I-15 NB Ramps and 36th Street - Provide additional right-of-way and widen the roadway to a 4-lane Collector with a continuous left-turn lane.

42. Ocean View Boulevard, between 36th Street and 40th Street - Provide additional right-of-way and widen the roadway to a 4-lane Collector with a continuous left-turn lane.

48. National Avenue, between 27th Street and 28th Street - Provide additional right-of-way and widen the roadway to a 4-lane Collector with a continuous left-turn lane.

49. National Avenue, between 28th Street and I-5 NB Ramps - Provide additional right-of-way and widen the roadway to a 4-lane Collector with a continuous left-turn lane.

50. National Avenue, between I-5 NB Ramps and 32nd Street - Provide additional right-of-way and widen the roadway to a 4-lane Collector with a continuous left-turn lane.

51. National Avenue, between 32nd Street and 43rd Street - Provide additional right-of-way and widen the roadway to a 4-lane Collector with a continuous left-turn lane.

56. Alpha Street, between 38th Street and 43rd Street - Provide additional right-of-way and widen to provide a continuous left-turn lane.

57. Division Street, between Main Street and Osborn Street - Provide additional right-of-way and widen the roadway to a 4-lane Collector with a continuous left-turn lane.

66. Cesar Chavez Parkway, between Commercial Street and I-5 NB Ramps - Provide additional right-of-way and widen to provide a 2-lane Collector with a continuous left-turn lane.

68. 25th Street, between SR-94 WB Off-Ramp and SR-94 EB On-Ramp - Provide additional right-of-way and widen the roadway to a 4-lane Collector with a continuous left-turn lane.

69. 25th Street, between SR-94 EB On-Ramp and Market Street - Provide additional right-of-way and widen the roadway to a 4-lane Collector with a continuous left-turn lane.

70. 25th Street, between Market Street and Imperial Avenue - Provide additional right-of-way and widen the roadway to a 4-lane Collector with a continuous left-turn lane.

72. 28th Street, between SR-94 WB Ramps and SR-94 EB Ramps - Provide additional right-of-way and widen to provide a continuous left-turn lane.

73. 28th Street, between SR-94 EB Ramps and Market Street - Provide additional right-of-way and widen to provide a continuous left-turn lane.

74. 28th Street, between Market Street and Imperial Avenue - Provide additional right-of-way and widen to provide a continuous left-turn lane.

76. 28th Street, between Commercial Street and Ocean View Boulevard - Provide additional right-of-way and widen to provide a continuous left-turn lane.

77. 28th Street, between Ocean View Boulevard and National Avenue - Provide additional right-of-way and widen to provide a continuous left-turn lane.

79. 30th Street, between E Street and Imperial Avenue - Provide additional right-of-way and widen to provide a continuous left-turn lane.

83. 32nd Street, between SR-94 EB On-Ramp/F Street and Market Street - Provide additional right-of-way and widen to provide a continuous left-turn lane.

84. 32nd Street, between Market Street and Imperial Avenue - Provide additional right-of-way and widen to provide a continuous left-turn lane.

87. 32nd Street, between Ocean View Boulevard and National Avenue - Provide additional right-of-way and widen to provide a continuous left-turn lane.

88. 32nd Street, between National Avenue and Boston Avenue - Provide additional right-of-way and widen to provide a continuous left-turn lane.

89. 35th / Rigel Street, between Ocean View Boulevard and Main Street - Provide additional right-of-way and widen to provide a continuous left-turn lane.

99. 43rd Street, between Logan Avenue and Newton Avenue - Provide additional right-of-way and widen the roadway to a 4-lane Collector with a continuous left-turn lane.

100. 43rd Street, between Newton Avenue and Beta Street - Provide additional right-of-way and widen to provide a continuous left-turn lane.

101. 43rd Street, between Beta Street and Delta Street - - Provide additional right-of-way and widen the roadway to a 4-lane Major Arterial with a raised median.

102. 43rd Street / Highland Avenue, between Delta Street and Division Street - Provide additional right-of-way and widen the roadway to a 4-lane Collector with a continuous left-turn lane.

105. Mallard Street, between Federal Boulevard and 69th Street - Provide additional right-of-way and widen to provide a continuous left-turn lane.

ENCANTO NEIGHBORHOODS

14. Market Street/Atkins Avenue, between Euclid Avenue and 60th Street – Provide additional right-of-way and widen to provide a continuous left-turn lane.

27. Imperial Avenue, between San Jacinto Drive and Valencia Parkway – Provide additional right-of-way and widen the roadway to a 4-lane Major Arterial with a raised median.

54. Logan Avenue, between 47th Street and Euclid Avenue – Provide additional right-of-way and widen the roadway to a 4-lane Collector with a continuous left-turn lane.

63. Division Street, between 58th Street and Valencia Parkway – Provide additional right-of-way and widen the roadway to a 4-lane Collector with a continuous left-turn lane.

114. Lisbon Street, between Imperial Avenue and 71st Street – Provide additional right-of-way and widen the roadway to a 4-lane Collector with a continuous left-turn lane.

117. Skyline Drive, between Valencia Parkway and 61st Street – Provide additional right-of-way and widen the roadway to a 4-lane Collector with a continuous left-turn lane.

118. Skyline Drive, between 61st Street and Omeara Street – Provide additional right-of-way and widen the roadway to a 4-lane Collector with a continuous left-turn lane.

121. Olvera Avenue/58th Street, between Euclid Avenue and Skyline Drive – Provide additional right-of-way and widen to provide a continuous left-turn lane.

123. Plaza Boulevard, between Division Street and Woodman Street – Provide additional right-of-way and widen to provide a continuous left-turn lane.

124. 47th Street, between SR-94 EB On-Ramp and Market Street – Provide additional right-of-way and widen the roadway to a 4-lane Collector with a continuous left-turn lane.

125. 47th Street, between Market Street and Imperial Avenue – Provide additional right-of-way and widen the roadway to a 4-lane Collector with a continuous left-turn lane.

126. 47th Street, between Imperial Avenue and Logan Avenue – Provide additional right-of-way and widen the roadway to a 4-lane Collector with a continuous left-turn lane.

127. 47th Street, between Logan Avenue and I-805 NB Ramps – Provide additional right-of-way and widen the roadway to a 4-lane Collector with a continuous left-turn lane.

137. Bayview Heights Way, between SR-94 WB Ramps and SR-94 EB Ramps – Provide additional right-of-way and widen the roadway to a 4-lane Collector with a continuous left-turn lane.

138. Kelton Road, between SR-94 EB Ramps and Alvin Street – Provide additional right-of-way and widen the roadway to a 4-lane Collector with a continuous left-turn lane.

138. Alvin Street, between Kelton Road and Pitta Street – Provide additional right-of-way and widen to provide a continuous left-turn lane.

140. Pitta Street, between Alvin Street and Market Street – Provide additional right-of-way and widen to provide a continuous left-turn lane.

146. 60th Street, between Federal Boulevard and Imperial Avenue – Provide additional right-of-way and widen the roadway to a 4-lane Collector with a continuous left-turn lane.

147. 61st Street, between Imperial Avenue and Division Street – Provide additional right-of-way and widen to provide a continuous left-turn lane.

152. Woodman Street, between Imperial Avenue and Skyline Drive – Provide additional right-of-way and widen to provide a continuous left-turn lane.

SOUTHEASTERN SAN DIEGO & ENCANTO NEIGHBORHOODS

11. Market Street, between I-805 SB Ramps & I-805 NB Ramps - Provide additional right-of-way and widen the roadway to a 4-lane Collector with a continuous left-turn lane.

43. Ocean View Boulevard, between 40th Street and 47th Street - Provide additional right-of-way and widen to provide a continuous left-turn lane.

53. Logan Avenue, 45th Street and 47th Street - Provide additional right-of-way and widen the roadway to a 4-lane Collector with a continuous left-turn lane.

SPHERE OF INFLUENCE

31. Commercial Street, between 17th Street and 19th Street - Provide additional right-of-way and widen to provide a continuous left-turn lane.

45. National Avenue, between Beardsley Street and SR-75 Off-Ramp - Provide additional right-of-way and widen to provide a continuous left-turn lane.

47. National Avenue, between 26th Street and 27th Street - Provide additional right-of-way and widen the roadway to a 4-lane Collector with a continuous left-turn lane.

78. 28th Street, between National Avenue and Boston Avenue - Provide additional right-of-way and widen the roadway to a 4-lane Major Arterial with a raised median.

However, these additional potential improvement measures are not recommended as part of the CPUs and are not included as part of the Project. These improvement measures are not recommended due to inconsistency with the mobility vision, goals and policies of the Community Plan Update. As stated in the SESD Mobility Element Section 3.3, on page 3-10 and in the Encanto Neighborhoods Mobility Element Section 3.3, on page 3-9:

> "Due to the urbanized nature of the community, most public right-of-way is fully constructed with streets and sidewalks as well as adjacent development. A guiding strategy for street system planning was to provide a Complete Streets network (accommodating all modes and users) while largely limiting recommendations to modifications within the existing rights-of-way, and to avoid extensive road widening in the largely built out urban community."
>
> Additionally, the following project Goals are taken from page 3-2 of the SESD CPU Mobility Element and page 3-2 of the Encanto Neighborhoods CPU Mobility Element:
>
> - A complete network of pedestrian-friendly, multi-modal facilities throughout the community.
> - Pedestrian-friendly infrastructure including sidewalks with parkways, gridded streets and pedestrian-scale blocks.
> - Safe, walkable neighborhoods which utilize new paseos, pedestrian connections, improved sidewalks, and make use of the alley network for vehicular access.
> - A complete, safe, and efficient bicycle network that connects community destinations and links to surrounding communities and the regional bicycle network.

Because the potential additional improvement measures identified in the TIS emphasize modifications in the existing rights-of way, including roadway widening, in contrast to the mobility vision, goals and policies of the CPUs, they are not recommended as a part of the CPUs Therefore, the impact to these roadway segments would remain significant and unmitigated. At the project-level, partial mitigation may be possible in the form of transportation demand management measures that encourage carpooling and other alternate modes of transportation. At the time future subsequent development projects are proposed, project-specific traffic analyses would contain detailed recommendations. All project-specific mitigation for direct impacts shall be implemented prior to the issuance of Certificate of Occupancy in order to provide mitigation at the time of impact.

Rationale and Conclusion

The City shall implement all policies identified in the Mobility Element to reduce the demand for vehicles on the City's transportation system. However, as identified above, even with implementation of these policies, the impacts would remain significant and unavoidable.

Transportation (Freeway Traffic)

Significant Effect

Implementation of the CPUs would result in the addition of a substantial amount of traffic to a congested freeway segment, interchange, or ramp.

Facts in Support of Finding

Under buildout of the CPU, the following twenty-four (24) freeway segments within the project study area are anticipated to operate at less than desirable LOS E or F:

- I-5, between 17th Street and SR-94 – (SB: LOS F);
- I-5, between SR-94 and Imperial Avenue – (NB: LOS F / SB: LOS E);
- I-5, between Imperial Avenue and SR-75 – (NB: LOS E);
- I-5, between SR-75 and 28th Street – (NB: LOS E);
- I-5, between 28th Street and I-15 – (NB: LOS F / SB: LOS E);
- I-5, between I-15 and Main Street – (NB: LOS F / SB: LOS F);
- I-15, between I-805 and SR-94 – (SB: LOS E);
- I-15, between Market Street and Ocean View Boulevard – (NB: LOS E / SB: LOS F);
- I-805, between Home Avenue and SR-94 – (NB: LOS E / SB: LOS E);
- I-805, between SR-94 and Market Street – (NB: LOS E / SB: LOS E);
- I-805, between Market Street and Imperial Avenue – (NB: LOS E / SB: LOS E);
- I-805, between Imperial Avenue and 43rd Street – (NB: LOS E / SB: LOS F);
- SR-94, between 17th Street and 25th Street – (EB: LOS E / WB: LOS E);
- SR-94, between 25th Street and 28th Street – (EB: LOS F / WB: LOS E);
- SR-94, between 28th Street and 30th Street – (EB: LOS F / WB: LOS F);
- SR-94, between 30th Street and I-15 – (EB: LOS E / WB: LOS E);
- SR-94, between I-15 and Home Avenue – (WB: LOS E);
- SR-94, between Home Avenue and I-805 – (WB: LOS E);
- SR-94, between I-805 and 47th Street – (EB: LOS F / WB: LOS E);
- SR-94, between 47th Street and Euclid Avenue (EB: LOS E / WB: LOS F);
- SR-94, between Euclid Avenue and Kelton Road (EB: LOS F / WB: LOS E);
- SR-94, between Kelton Road and Federal Boulevard – (EB: LOS F / WB: LOS E);
- SR-94, between Federal Boulevard and College Grove Way – (EB: LOS F / WB: LOS E); and
- SR-94, between College Grove Way and College Avenue – (EB: LOS F / WB: LOS F).

Based on the criteria documented previously, the CPUs would have a significant impact to all freeway segments listed above with the following exceptions:

- I-805, between Home Avenue and SR-94; and
- I-805, between SR-94 and Market Street.

The following mitigation measures have been identified. However, adherence to the measures would not reduce the impact to freeway traffic to below a level of significance.

I-5, between 17th Street and SR-94; **I-5, between SR-94 and Imperial Avenue; I-5, between Imperial Avenue and SR-75; I-5, between SR-75 and 28th Street; I-5, between 28th Street and I-15; and I-5, between I-15 and Main Street** – The SANDAG 2050 Revenue Constrained Regional Transportation Plan (RTP) includes operational improvements along I-5 between 17th Street and Main Street. These improvements are expected to be built by 2050. There is some uncertainty related to the actual developments and associated traffic impacts that will materialize over time. Future development projects' transportation studies would be able to more accurately identify individual project-level impacts and provide the mechanism to mitigate them through fair share contributions in addition to the funding planned by SANDAG and other funding sources consistent with SANDAG Revenue Constrained RTP. The SESD and Encanto Neighborhoods CPUs' significant traffic impact to this freeway segment would remain significant unmitigated at the program level.

I-15, between I-805 and SR-94; I-15, between Market Street and Ocean View Boulevard - The SANDAG 2050 Revenue Constrained RTP includes construction of managed lanes along I-15 between I-805 and Ocean View Boulevard. These improvements are expected to be built by 2035. There is some uncertainty related to the actual developments and associated traffic impacts that will materialize over time. Future development projects' transportation studies would be able to more accurately identify individual project-level impacts and provide the mechanism to mitigate them through fair share contributions in addition to the funding planned by SANDAG and other funding sources consistent with SANDAG Revenue Constrained RTP. The SESD and Encanto Neighborhoods CPUs' significant traffic impact to this freeway segment would remain significant unmitigated at the program level.

I-805, between Market Street and Imperial Avenue; and I-805, between Imperial Avenue and 43rd Street – The SANDAG 2050 Revenue Constrained RTP includes construction of managed lanes along I-805 between Market Street and 43rd Street. These improvements are expected to be built by 2030. There is some uncertainty related to the actual developments and associated traffic impacts that will materialize over time. Future development projects' transportation studies would be able to more accurately identify individual project-level impacts and provide the mechanism to mitigate them through fair share contributions in addition to the funding planned by SANDAG and other funding sources consistent with SANDAG Revenue Constrained RTP. The SESD and Encanto Neighborhoods CPUs' significant traffic impact to this freeway segment would remain significant unmitigated at the program level.

SR-94, between 17th Street and 25th Street; SR-94, between 25th Street and 28th Street; SR-94, between 28th Street and 30th Street; SR-94, between 30th Street and I-15; SR-94, between I-15 and Home Avenue; and SR-94, between Home Avenue and I-805 – The SANDAG 2050 Revenue Constrained RTP includes construction of managed lanes along SR-94 between 17th Street and I-805. These improvements are expected to be built by 2020. There is some uncertainty related to the actual

developments and associated traffic impacts that will materialize over time. Future development projects' transportation studies would be able to more accurately identify individual project-level impacts and provide the mechanism to mitigate them through fair share contributions in addition to the funding planned by SANDAG and other funding sources consistent with SANDAG Revenue Constrained RTP. The SESD and Encanto Neighborhoods CPUs' significant traffic impact to this freeway segment would remain significant unmitigated at the program level.

SR-94, between I-805 and 47th Street; SR-94, between 47th Street and Euclid Avenue; SR-94, between Euclid Avenue and Kelton Road; SR-94, between Kelton Road and Federal Boulevard; SR-94, between Federal Boulevard and College Grove Way; and SR-94, between College Grove Way and College Avenue – The SANDAG 2050 Revenue Constrained RTP includes construction of managed lanes along SR-94 between I-805 and College Avenue. These improvements are expected to be built by 2040. There is some uncertainty related to the actual developments and associated traffic impacts that will materialize over time. Future development projects' transportation studies would be able to more accurately identify individual project-level impacts and provide the mechanism to mitigate them through fair share contributions in addition to the funding planned by SANDAG and other funding sources consistent with SANDAG Revenue Constrained RTP. The SESD and Encanto Neighborhoods CPUs significant traffic impact to this freeway segment would remain significant unmitigated at the program level.

There is some uncertainty related to the actual developments and associated traffic impacts that will materialize over time. Future development projects' transportation studies would be able to more accurately identify individual project-level impacts and provide the mechanism to mitigate them through fair share contributions in addition to the funding planned by SANDAG and other funding sources consistent with SANDAG Revenue Constrained RTP. Future potential mitigation measures and fair share contribution should thus be further evaluated at the project level, though freeway traffic impacts from the CPUs would remain unmitigated at the program level.

Rationale and Conclusion

The City shall implement all policies identified in the Mobility Element to reduce the demand for vehicles on the regional transportation system. However, as identified above, even with implementation of these policies, the impacts to I-5, I-15, I-805, and SR-94 shall remain significant and unavoidable at the program level.

Transportation (Existing or Planned Transportation System)

Significant Effect

Implementation of the CPUs would result in a substantial impact upon existing or planned transportation system.

Facts in Support of Finding

As shown under Impact 5.2-1 and Impact 5.2-2 of the FEIR, and in the discussion of impacts to the capacity of the street system and freeway system included above, adoption of the CPUs would result in a significant impact upon the existing transportation system. As discussed above, mitigation measures identified as part of the TIS for capacity of the street system are not compatible with the mobility vision,

goals, and policies of the CPUs, and adherence to the identified mitigation measures for freeway traffic would not reduce the impact to freeway traffic to below a level of significance.

Rationale and Conclusion

The City shall implement all policies identified in the Mobility Element to reduce the demand for vehicles on the existing and planned transportation system. However, as identified above, even with implementation of these policies, the impacts to existing or planned transportation system shall remain significant and unavoidable.

Air Quality (Ozone)

Significant Effect

Implementation of the CPUs would substantially contribute to the existing violation of state and federal ambient air quality standards for ozone. The San Diego Air Basin is not in attainment for O_3, PM_{10}, and $PM_{2.5}$. Construction under the CPUs could potentially contribute to localized violations, and operational emissions could potentially contribute to regional violations.

Facts in Support of Finding

As discussed in Section 5.3 of the FEIR, future projects that conform to the CPUs could contribute to cumulatively considerable emissions if multiple projects are implemented simultaneously. In general, implementation of the policies in the CPUs and General Plan would preclude or reduce air quality impacts. However, it is possible that for certain projects, adherence to the regulations may not adequately protect air quality, and such projects would require additional measures to avoid or reduce significant air quality impacts. Therefore, construction activities under the CPUs would have a potentially significant impact on local air quality without mitigation.

Additionally, operational emissions of land uses proposed under the Encanto Neighborhoods CPU could potentially contribute to regional violations. As discussed under Impact 5.3-1 of the FEIR, total ROG, NOx, and CO emissions under the SESD CPU would conflict with implementation of the RAQS. Therefore, the CPUs would contribute substantially to an existing air quality violation and would have a potentially significant impact on regional air quality without mitigation.

The goals, policies, and recommendations of the City combined with the federal, state, and local regulations provide a framework for developing project-level air quality protection measures for future discretionary projects. The City's process for the evaluation of discretionary projects includes environmental review and documentation pursuant to CEQA as well as an analysis of those projects for consistency with the goals, policies, and recommendations of the General Plan and CPUs. In general, implementation of the policies in the CPUs and General Plan would preclude or reduce air quality impacts. Compliance with the standards is required of all projects and is not considered to be mitigation. However, it is possible that for certain projects, adherence to the regulations would not adequately protect air quality, and such projects would require additional measures to avoid or reduce significant air quality impacts. These additional measures would be considered mitigation.

Where mitigation is determined to be necessary and feasible, these measures shall be included in a Mitigation Monitoring and Reporting Program for the project.

Mitigation Framework measures MM-AQ-1 and MM-AQ-2 shall be implemented to reduce project-level impacts. These measures shall be updated, expanded and refined when applied to specific future projects based on project-specific design and changes in existing conditions, and local, state, and federal laws.

Rationale and Conclusion

Identified mitigation would reduce emissions and may preclude many potential impacts. As no project-specific data are available at this time, air emissions from the future developments within the CPU areas cannot be adequately quantified. Mitigation Framework measures MM-AQ-1 and MM-AQ-2 would be implemented; however, impacts would remain significant and unavoidable at the program level.

Noise (Transportation Noise)

Significant Effect

Implementation of the CPUs would result in the exposure of people to future transportation noise levels which exceed the land use compatibility standards established in the General Plan. Transportation noise impacts would result primarily from vehicle traffic. Impacts from rail- and airport-related traffic are considered less than significant.

Facts in Support of Finding

As discussed in Section 5.4 of the FEIR, the roads generating the greatest noise level in the CPU areas are I-5, I-805, I-15, SR-94, Market Street, Imperial Avenue, Ocean View Boulevard, 47th Street, Euclid Avenue, and National Avenue. The local freeways are the dominant noise sources in the CPU areas and traffic noise levels at residential land uses nearest these freeways currently exceed the City's compatibility thresholds for residential land uses. Traffic noise levels at existing and proposed residential use areas closest to the freeways and heavily traveled roadways would exceed the City's compatibility thresholds for residential land uses. Noise levels greater than 75 CNEL are considered incompatible for all land use types. Uses located adjacent to I-5, I-15, I-805, and SR-94 have the potential to be exposed to noise levels greater than 75 CNEL.

Noise levels at noise sensitive receptors may already exceed applicable standards due to noise from vehicle traffic. Traffic levels are forecasted to increase over time, so future noise levels would increase with or without adoption of the CPUs. This increase in noise levels may cause existing and proposed noise sensitive receptors to be exposed to noise levels in excess of applicable standards. Thus, without mitigation, implementation of the CPUs may result in significant impacts by allowing sensitive receivers to be located in areas where exterior noise levels exceed the compatibility standards established by the General Plan.

Rationale and Conclusion

Implementation of the policies in the CPUs and General Plan would preclude or reduce traffic noise impacts. In addition, the City's process for the evaluation of discretionary projects includes environmental review and documentation pursuant to CEQA as well as an analysis of those projects for consistency with the goals, policies, and recommendations of the General Plan. Compliance with the standards is required of all projects and is not considered to be mitigation. However, it is possible that for certain projects, adherence to the regulations may not adequately reduce noise levels, and such projects would require

additional measures to comply with applicable standards. Adherence to the Mitigation Framework detailed in MM-NOS-1 and MM-NOS-2, which requires regulatory compliance as noted above, would ensure that impacts related to exterior and interior noise for new development are reduced; however, even with strict adherence to the Mitigation Framework, these impacts cannot be reduced to below a level of significance and therefore, the impacts remain significant and unavoidable.

Noise (Ambient Noise)

Significant Effect

Implementation of the CPUs would result in a significant increase in the existing ambient noise levels.

Facts in Support of Finding

As discussed in Section 5.4 of the FEIR, a potentially significant impact would occur along 14 roadway segments in the SESD CPU area and 10 roadway segments in the Encanto Neighborhoods CPU area. There are existing sensitive uses located adjacent to these roadway segments, and there could be also future sensitive uses located adjacent to them.

Rationale and Conclusion

Possible noise-reduction measures would include the construction of barriers between heavily traveled roadways and noise-sensitive exterior use areas, as well as retrofitting older homes with new window and door components with higher STC ratings to help reduce interior noise impacts. However, implementation of mitigation measures cannot be assured since the degree of future program-level impacts and applicability, feasibility, and success of future mitigation measures cannot be adequately known for each specific future project at the program level.

However, because the significant noise impacts are to existing homes in an already urbanized area it cannot be determined whether the existing structures contain adequate attenuation to reduce interior noise to the 45 CNEL standard, nor what measures would be required to retrofit these structures to meet the City's General Plan compatibility standards, and there is no mechanism in place for implementing such a retrofit program. The proposed mitigation measures are not tied to any development plan, phasing plan, or other agency and therefore funding cannot be assured to reduce the significant program-level impacts arising from the proposed CPUs implementing programs, including zoning regulations and Public Facilities Financing Plans (PFFPs), associated with noise. Thus, the degree of impact and applicability, feasibility, and success of these measures cannot be adequately known for each specific project at this level of analysis.

A mitigation framework exists for new development in areas exposed to high levels of ambient noise. Implementation of General Plan and CPU policies, requirements in the Municipal Code, and compliance with applicable regulations (Title 24) would reduce traffic noise exposure, because they set standards for the siting of sensitive land uses. Site-specific noise analyses that demonstrate that the project would not place sensitive receptors in locations where the exterior existing or future noise levels would exceed the noise compatibility standards of the City's General Plan would be required for multi-family development proposals. With this framework, noise impacts to new multi-family development would be less than significant. This would also be the case for other discretionary projects, as the Mitigation Framework can be required as conditions of future permit approvals. Additionally, for ministerial projects, during the

application process, the City evaluates the project location in relation to noise contours provided in community plans. Projects located in areas that exceed the applicable land use and noise compatibility level would be required to demonstrate that noise levels would not exceed the General Plan noise compatibility guidelines for the subject land use.

Compliance with the standards is required of all projects and is not considered to be mitigation. However, it is possible that for certain projects, adherence to the regulations may not adequately reduce noise levels, and such projects would require additional measures to comply with applicable standards. Thus, without mitigation, implementation of the CPUs would result in a significant impact from traffic noise, because the CPUs would potentially allow sensitive receptors to be located in areas where exterior noise levels exceed the compatibility standards established by the General Plan. Adherence to the Mitigation Framework detailed in MM-NOS-1 and MM-NOS-2, which requires regulatory compliance as noted above, would ensure that impacts related to exterior and interior noise are reduced; however, even with strict adherence to the Mitigation Framework, these impacts cannot be reduced to below a level of significance. Therefore, the impacts would remain significant and unavoidable at the program level.

D. Findings Regarding Alternatives (CEQA § 21081(a)(3) and CEQA Guidelines §15091(a)(3))

Because the proposed project will cause one or more unavoidable significant environmental effects, the City must make findings with respect to the alternatives to the proposed project considered in the FEIR, evaluating whether these alternatives could feasibly avoid or substantially lessen the proposed project's unavoidable significant environmental effects while achieving most of its objectives (listed in Section II.E above and Section 3.3 of the FEIR).

The City, having reviewed and considered the information contained in the FEIR and the Record of Proceedings, and pursuant to Public Resource Code §21081(a)(3) and State CEQA Guidelines §15091(a)(3), makes the following findings with respect to the alternatives identified in the FEIR (Project No. 386029/SCH No. 2014051075):

> *Specific economic, legal, social, technological, or other considerations, including considerations of the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the FEIR as described below.*
>
> *"Feasible" is defined in Section 15364 of the CEQA Guidelines to mean "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors." The CEQA statute (Section 21081) and Guidelines (Section 15019(a)(3)) also provide that "other" considerations may form the basis for a finding of infeasibility. Case law makes clear that a mitigation measure or alternative can be deemed infeasible on the basis of its failure to meet project objectives or on related public policy grounds.*

Background

The EIR for the proposed CPUs conducted an analysis of three alternatives:

- No Project Alternative (Adopted Community Plan);
- Higher-Density Alternative
- Lower-Density Alternative

These three project alternatives are summarized below, along with the findings relevant to each alternative.

No Project Alternative (Adopted Community Plan)

The No Project Alternative is the continued implementation of the adopted 1987 SESD Community Plan, consistent with CEQA Guidelines Section 15126.6(e)(3)(A). The current Community Plan addresses the following key issues in the community through its policies and regulations: need for employment opportunities and commercial shopping; concerns about density; community design and appearance; lack of connectively on the street system; adequate public facilities including for recreation and education; and the disproportionate number of assisted housing projects and social services in the community.

Existing Community Plan land use designations seek to promote a balance of land uses. The majority of both planning areas is designated as Single-Family Residential. In Southeastern San Diego, most of this land is designated for development at 10 to 14 units per acre, while in Encanto Neighborhoods most land is designated at a lower density of 5 to 10 units per acre.

In Southeastern San Diego, the Imperial Avenue corridor is designated as Multiple Use, along with 25th Street and the western portion of Market Street. The General Commercial designation applies to Market Street between 25th and 32nd Streets and National Avenue between 28th and 33rd Streets as well as to segments of National Avenue east of Highway 15 that have existing commercial uses. Commercial Street and eastern portions of Market Street (e.g. Gateway Center) are designated as Industrial. Institutional and Schools/Public Facilities are used somewhat interchangeably to designate public/quasi-public facilities.

In Encanto Neighborhoods, much of the area west of Euclid Avenue and along Imperial Avenue is designated for Multi-Family Residential and, to a lesser extent, for commercial uses. Institutional and Schools/Public Facilities are designated for City-owned and other public/quasi-public facilities.

Potentially Significant Effects

Land uses maintained by the No Project Alternative would be consistent with those of the CPUs in much of both CPU areas. Proposed land use changes in the CPUs would be concentrated along Market Street, the Commercial/Imperial corridor, and National Avenue in Southeastern San Diego, and around the Euclid and Market area in Encanto Neighborhoods, where the proposed CPUs would generally facilitate more mixed-use and higher-intensity development compared to the existing Community Plan (No Project Alternative).

Implementation of the No Project Alternative would not avoid any of the significant and unavoidable impacts of the CPUs (transportation [capacity, freeway traffic, existing or planned transportation system], air quality [ozone], and noise [transportation noise, ambient noise]), though it may result in lesser impacts for some (transportation, ambient noise).

The amount of preserved open space would be less under the No Project Alternative than under the proposed CPUs. Thus, implementation of this alternative would result in greater impacts to biological resources and hydrology and water quality. Future development under the alternative would be required to adhere to existing regulations, thus limiting the potential for significant impacts.

The alternative also has potential for greater impacts in the issue areas of land use, transportation (alternative transportation), noise (transportation), historical resources, geology and seismic hazards, greenhouse gas emissions, and energy (fuel). It lacks the CPUs' updated policies that would serve to reduce impacts from future development. The alternative lacks policies that support the General Plan's "City of Villages" strategy, and would not implement the environmental goals, objectives, and guidelines of the General Plan's various elements to the same extent as the CPUs.

The alternative has potential for lesser impacts in the issue areas of transportation (all except alternative transportation), air quality, noise (ambient noise), hazardous materials, energy (electrical power), public services and facilities, and public utilities. The alternative would generate fewer vehicular trips than the CPUs for both the Southeastern San Diego and Encanto Neighborhoods communities. However, the No Project (Adopted Community Plan) Alternative does not contain the proposed CPU policies intended to promote a robust multimodal network that encourage walking, bicycling, and taking transit while continuing to provide for needed vehicular access in both communities.

The No Project Alternative meets several of the 10 project objectives, but none to the same extent as the CPUs. The No Project Alternative also does not include the two mixed-use villages as proposed by the CPUs. The Village Districts proposed under the CPUs implement both General Plan and CPU goals for compact communities, a wider range of housing types, affordability, greater transit opportunities, etc. The No Project Alternative would allow for some suburban-type development, which would be more auto-centric, and contribute to, rather than reduce GHG impacts.

Finding and Supporting Facts

Adoption of the No Project (Adopted Community Plan) Alternative would not achieve important objectives of the Community Plan Updates. These include:

- **Multi-Modal Transportation Strategy**: Include walkable and bicycle friendly streets, accessible and enhanced transit options, and comprehensive parking strategies throughout both communities.
- **Housing**: Increase allowed densities in close proximity to transit in order to provide more and varied housing and meet workforce needs close to employment centers.
- **Complete Places**: Create balanced, integrated mix of uses in Southeastern San Diego and Encanto Neighborhoods while minimizing collocation compatibility issues.
- **Transit**: Coordinate land use planning with high frequency transit service planning.
- **Infrastructure**: Include financing mechanisms designed to secure infrastructure improvements concurrent with large development.
- **Environmental Leadership and Sustainability**: Follow environmentally sensitive design and sustainable development practices.

- **Streamline Permit Processing**: Ensure a less costly and time-intensive process within the identified Village Districts. Incorporate specific incentives in the Encanto Neighborhoods Village District to achieve transit-supportive densities within a ¼ mile of the transit stations.

Therefore, because this alternative fails to meet multiple project objectives, and failure to meet even a single objective would be sufficient for rejection of the alternative, this alternative is considered infeasible.

Further, the No Project Alternative is infeasible because it would not meet the General Plan policy regarding preparation of community plan updates. Specifically, Policy LU-C.1 requires that the update process "establish each community plan as an essential and integral component of the City's General Plan with clear implementation recommendations and links to General Plan goals and policies." It further states that community plan updates are important to "maintain consistency between community plans and General Plan, as together they represent the City's comprehensive plan. The No Project Alternative would not allow for the update to proceed and achieve these General Plan policies.

Higher-Density Alternative

The Higher-Density Alternative focuses new higher-density, mixed-use development in the Village Districts to a greater degree than the proposed Community Plans. This Alternative goes further than the proposed Plans in supporting the goal of facilitating transit-oriented development and a range of housing types.

In Southeastern San Diego, the Commercial Street corridor between 28th and 32nd streets would retain its current industrial designation in the proposed Community Plan. In contrast, this corridor would be designated Neighborhood Mixed Use-Medium, allowing mixed use development with ground-floor retail and 30 to 44 units per acre, in Alternative 1.

In Encanto Neighborhoods, the core area of the Village District would be designated Community Mixed Use-Medium (30 to 44 units per acre) in the proposed Plan, while it would be designated Community Mixed Use-High, allowing up to 74 units per acre, in Alternative 1. In addition, the Commercial Mixed Use designation on the west side of Euclid Avenue north of Hilltop Drive would extend further to the west in Alternative 1 compared to the proposed Plan. This would result in an increase in the development capacity of this large, vacant site in Alternative 1 compared to the CPUs.

Throughout the rest of both planning areas, designated land uses would be the same as in the CPUs, and the Higher-Density Alternative would also feature all the same policies as the CPUs. As with the CPU, with the exceptions of significant and unavoidable impacts, strict adherence to the applicable mitigation framework for each applicable issue area would reduce potential impacts to below a level of significance.

Potentially Significant Effects

Implementation of the Higher-Density Alternative would not avoid any of the identified significant and unavoidable impacts of the CPUs (transportation [capacity of the street system, freeway traffic, existing or planned transportation system], air quality [ozone], and noise [transportation noise, ambient noise]). It may result in less impact in terms of alternative transportation. but potentially greater impacts to transportation (capacity of the street system, freeway traffic) and noise (transportation noise, ambient noise in Encanto).

As discussed in Chapter 10 of the FEIR, this alternative would generate more vehicular trips than the CPUs for both the Southeastern San Diego and Encanto Neighborhoods communities. Since the High Density Alternative would have the same transportation network and policies as the CPUs, while generating a higher number of trips, transportation related impact associated with the Higher Density Alternative would be greater than the CPUs. A mitigation framework is included in this alternative. The City shall implement all policies identified in the Mobility Element to reduce the demand for vehicles on the City's transportation system. However, as identified above, even with implementation of these policies, the transportation impacts for capacity of the street system, freeway traffic, and existing or planned transportation system would remain significant and unavoidable.

This alternative has the potential for greater impacts in the issue areas of transportation (capacity of the street system, freeway), air quality (air quality, pollutants in Encanto Neighborhoods and overall), noise (transportation noise, ambient noise in Encanto Neighborhoods), paleontological resources, greenhouse gas, energy, public services and facilities, public utilities, and visual effects and neighborhood character.

The alternative has the potential for lesser impacts in the issue areas of land use (objectives of the General Plan), transportation (alternative transportation), and air quality (pollutants in Southeastern San Diego, though overall pollutant levels would be expected to increase due increased emissions in Encanto Neighborhoods).

Finding and Supporting Facts

Although the Higher-Density Alternative generally meets all the CPUs' objectives, it would have potential for greater environmental impacts in the CPU areas than the proposed CPUs, and would also not avoid the significant impacts of the proposed CPUs. Thus, this alternative is considered infeasible.

Lower-Density Alternative

The Lower-Density Alternative maintains the proposed CPUs' focus on creating walkable areas with mixed use development around the Trolley stations and along transit corridors. However, the density of future development would be lower under this alternative, resulting in less overall development.

In Southeastern San Diego, the Community Mixed Use-Medium designation around the 25th Street Trolley station would be reduced in size under Alternative 2 compared to the proposed Plan. In Alternative 2, the western end of the Commercial/Imperial corridor and the Cesar Chavez Parkway corridor would be designated for lower density (15 to 29 units per acre) mixed use. Portions of L Street would be designated for residential at 15 to 29 instead of 30 to 44 units per acre. Blocks in the southeast corner of the Logan Heights neighborhood would be designated for residential development at 15 to 29 as under the proposed Community Plan, but only 10 to 14 units per acre in Alternative 2. Blocks along Market Street and National Avenue which the Community Plan designates mixed use at 30 to 44 units per acre would be lowered to 15 to 29 units per acre under Alternative 2. Existing shopping centers on National Avenue and 43rd Street would retain a commercial designation matching their current use.

In Encanto Neighborhoods, the Community Mixed Use-Medium (30 to 44 units per acre) designation would be scaled back to a smaller core area around the Euclid and Market Trolley station in Alternative 2. The Market Street corridor to the west would be designated at 15 to 29 units per acre (Community Mixed Use-Low), as would land to the south of the Village core. The Euclid Avenue corridor north of the Village core would be also be designated at 15 to 29 units per acre instead of 30 to 44 as under the

proposed Plan. Similarly, the portion of the Imperial Avenue corridor in the Encanto Village District designated at 30 to 44 units per acre would become smaller, applying only on the blocks closest to the Trolley Station.

Throughout the rest of both planning areas, designated land uses would be the same as in the proposed Plans, and the Lower-Density Alternative would also feature all the same policies as the proposed Plans.

Potentially Significant Effects

This alternative would produce the least amount of development and associated impacts. Its impacts are expected to be similar to those analyzed for the CPUs for most of the environmental impact categories analyzed in this EIR—land use; transportation; air quality; greenhouse gases; noise; paleontological resources; biological resource; historical resources; geology and seismic hazards; hazardous materials; hydrology; public services and facilities; public utilities; and visual effects and neighborhood character.

Implementation of the Lower-Density Alternative would not avoid any of the identified significant and unavoidable impacts of the CPUs (transportation [capacity of the street system, freeway traffic, existing or planned transportation system], air quality [ozone], and noise [transportation noise, ambient noise]), though it may result in lesser impacts for some (transportation [capacity of the street system and freeway], air quality, noise [transportation noise, ambient noise in Southeastern San Diego). For noise (ambient noise in Encanto Neighborhoods), impacts would potentially be greater.

The Lower-Density Alternative would generate less vehicular trips than the CPUs for both the Southeastern San Diego and Encanto Neighborhoods community, and more vehicular trips than the CPUs for the Encanto Neighborhoods community. Since the Lower-Density Alternative would have the same transportation network and policies as the CPU, while generating less vehicular trips, transportation related impact associated with the Lower-Density Alternative would be less significant than the CPUs.

The Lower-Density Alternative also lessens the intensity of residential development within both villages. Greater density within the Village Districts, such as that proposed under the CPU, better implements General Plan and CPU goals for compact communities, a wider range of housing types, affordability, greater transit opportunities, etc. The Lower-Density alternative would allow for more suburban-type development, which would be more auto-centric, and contribute to, rather than reduce GHG impacts.

Although this alternative would reduce density, the development footprint within the CPU would remain generally the same, and therefore, result in similar areas requiring grading and ground disturbance as with the CPU. Therefore, this alternative would have similar, or in some cases less impacts to biological resources, historical resources, hydrology/water quality, human health/public safety/hazardous materials, utilities (including solid waste), and paleontological resources depending on the location and development footprint. As with the CPU, with the exceptions of significant and unavoidable impacts, strict adherence to the applicable mitigation framework for each applicable issue area would reduce potential impacts to below a level of significance.

Finding and Supporting Facts

Although the Lower-Density Alternative generally meets the CPUs' objectives, it would be less effective in implementing the General Plan's "City of Villages" strategy, as well as the following objectives:

- **Housing**: Increase allowed densities in close proximity to transit in order to provide more and varied housing and meet workforce needs close to employment centers.
- **Complete Places**: Create balanced, integrated mix of uses in Southeastern San Diego and Encanto Neighborhoods while minimizing collocation compatibility issues.
- **Environmental Leadership and Sustainability**: Follow environmentally sensitive design and sustainable development practices.

Because this alternative would not avoid the significant impacts of the proposed CPUs, and would not attain important objectives as discussed above, with failure to meet even a single objective sufficient for rejection of the alternative, this alternative is considered infeasible.

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