

**EXHIBIT C**

**DRAFT**

**STATEMENT OF OVERRIDING CONSIDERATIONS  
(PUBLIC RESOURCES CODE §21081(B))**

**REGARDING THE FINAL ENVIRONMENTAL IMPACT REPORT  
FOR THE SOUTHEASTERN SAN DIEGO AND ENCANTO NEIGHBORHOODS  
COMMUNITY PLAN UPDATE**

**PROJECT NO. 386029**

**SCH NO. 2014051075**

October 2015

## **STATEMENT OF OVERRIDING CONSIDERATIONS**

### **(PUBLIC RESOURCES CODE §21081(B))**

Pursuant to Section 21081(b) of CEQA and CEQA Guidelines §15093 and 15043, CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other 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 considerations for the provision of employment opportunities for highly trained workers outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered acceptable pursuant to Public Resources Code §21081. CEQA further requires that when the lead agency approves a project which will result in the occurrence of significant effects which are identified in the FEIR but are not avoided or substantially lessened, the agency shall state in writing the specific reasons to support its action based on the FEIR and/or other information in the record.

Pursuant to the Public Resources Code §21081(b) and Guidelines § 15093, the City Council, having considered all of the foregoing, finds that the following specific overriding economic, legal, social, technological, or other benefits associated with the proposed Project outweigh unavoidable adverse direct impacts related to transportation, air quality and noise. Each of the separate benefits of the proposed Project, as stated herein, is determined to be, unto itself and independent of the other project benefits, a basis for overriding all unavoidable adverse environmental impacts identified in the Findings.

The City Council also has examined alternatives to the Project, and finds that the proposed CPU alternatives discussed in the FEIR should not be adopted because while each alternative meets some of the basic objectives of the CPU, they do not meet them to the same extent as with the CPU, and do not meet the General Plan policies as further documented below; specifically, that economic, legal, social, technological, or other considerations make the alternatives infeasible. The City also finds that the economic, legal, social, and technological benefits of the proposed CPU that the City has found to override the alternatives' environmental benefits would be negated by the proposed CPU's alternatives.

The City finds that the Project most fully implements the City's desire to incorporate the General Plan's goals and policies into its neighborhoods as part of the long-term community plan update process.

The City Council declares that it has adopted all feasible mitigation measures to reduce the proposed CPU's environmental impacts to an insignificant level; considered the entire administrative record, including the FEIR; and weighed the proposed CPU's benefits against its environmental impacts. After doing so, the City Council has determined that the proposed CPU's benefits outweigh its environmental impacts, and deem them acceptable.

The City Council identified the following public benefits in making this determination. Each of these public benefits serves as an independent basis for overriding all unavoidable adverse environmental impacts identified in these Findings and the FEIR. The City Council considers these impacts to be acceptable, consistent with CEQA Guidelines section 15093.

The California Supreme Court has stated that, “[t]he wisdom of approving...any development project, a delicate task which requires a balancing of interests, is necessarily left to the sound discretion of the local officials and their constituents who are responsible for such decisions. The law as we interpret and apply it simply requires that those decisions be informed, and therefore balanced.” *Citizens of Goleta Valley v. Bd. of Supers.* (1990) 52 Cal.3d 553, 576.

Courts have upheld overriding considerations that were based on policy considerations including, but not limited to, new jobs, stronger tax base, implementation of an agency’s economic development goals, growth management policies, redevelopment plans, the need for housing and employment, conformity to community plans and general plans, and provision of construction jobs. See *Towards Responsibility in Planning v. City Council* (1988) 200 Cal. App.3d 671; *Dusek v. Redevelopment Agency* (1985) 173 Cal. App.3d 1029; *City of Poway v. City of San Diego* (1984) 155 Cal.App.3d 1037; *Markley v. City Council* (1982) 131 Cal.App.3d 656.

Therefore, the City expressly finds that in accordance with Public Resources Code §21081(b) and 21081.5, and CEQA Guidelines §§15093 and 15043, based on the following specific considerations, the following benefits of the Project outweigh the unavoidable significant environmental impacts of the Project:

**1. The CPUs will provide comprehensive guides for growth and development in the Southeastern San Diego and Encanto Neighborhoods Communities.**

The CPUs provide a comprehensive guide for future growth and development within the Southeastern San Diego and Encanto Neighborhoods. The overarching guiding principal includes focusing future growth and development into distinct village areas thereby preserving the surrounding established low density residential neighborhoods, designated historic districts and designated open space areas. This strategy provides a blueprint for development that strengthens Southeastern San Diego’s and the Encanto Neighborhoods established character as diverse urban neighborhoods through the creation of appropriate land uses, sufficient public facilities and development policies as a component of the City of San Diego’s General Plan.

The CPUs provide strategies and specific implementing actions to ensure that each vision developed by community stakeholders as part of the CPUs are accomplished. Detailed policies that are based on these visions and guiding principals are incorporated in each Community Plan that provide the basis for evaluating whether specific development proposals and public projects are consistent with the plan. As cited in the FEIR’s 5.1 Land Use section, the CPUs provide strategies and specific implementing actions to help ensure that each vision developed by the respective stakeholders is accomplished and that it is in conformance with the General Plan. Accompanying the approval of the CPUs are related detailed implementing programs, including zoning regulations and Impact Fee Studies (IFS), that will implement the Community Plan goals and policies.

The CPUs provide guidance that facilitates the ability of the City of San Diego, other public agencies, and private developers to design projects that enhance the character of the community, taking advantage of its setting and amenities. The respective CPUs' Land Use Elements encompass a broad range of land use designations defined in the General Plan, supplemented with a more detailed description and distribution of land uses for Southeastern San Diego and the Encanto Neighborhoods. The CPUs land use designations include: residential with a variety of density ranges, village centers, commercial, industrial, open space, parks, and institutional uses. These diverse land uses provide the foundation to create balanced communities that incorporate and promote a multi-modal transportation strategy, environmental leadership and sustainability, sufficient infrastructure improvements to meet the future population demands, protection of valuable open space and creeks, economic diversification, and complete places that create a balanced integrated mixture of uses while minimizing the collocation of uses.

Both CPUs provide goals and policies that will facilitate the following: the development of a variety of uses, facilities, and services needed to serve the Southeastern San Diego and Encanto Neighborhoods; two distinct villages that include places to live, work and recreate; the enhancement of the established historic districts, a variety of housing types including workforce housing in close proximity to jobs; diversified commercial and industrial uses that serve local, community and regional needs; and adequate public facilities and institutional resources that serve the needs of the community. Therefore, the goals and policies contained in the CPUs ensure a balance of land uses that respect sensitive uses, provide workforce housing near employment opportunities such as the working waterfront and Downtown San Diego, and enhance multi-modal transportation options by promoting growth in close proximity to the 25<sup>th</sup> Street, 32<sup>nd</sup> Street, 47<sup>th</sup> Street, Euclid Avenue and 62<sup>nd</sup> Street transit stations.

To accommodate both the existing population and the anticipated new growth, the IFSs will implement the public facilities and infrastructure described in the CPUs. The Southeastern San Diego and Encanto Neighborhoods CPU Public Facilities, Safety, and Services Element Policies include policies that support the development of infrastructure to support future growth. As such, the CPUs provide a consistent, comprehensive approach to developing a multi-modal infrastructure framework to support future housing and new employment opportunities as well as promoting new higher density mixed use development around the transit corridors and stations. These specific factors support the decision to approve the CPUs despite the significant unavoidable impacts identified in the FEIR.

## **2. The CPUs implement the General Plan's City of Villages Strategy by providing balanced land use plans that meet the needs of the Southeastern San Diego and Encanto Neighborhoods Communities**

The General Plan incorporates the City of Villages strategy, and aims to direct new development projects into already urbanized areas and areas with conditions allowing the integration of housing, employment, civic, and transit uses. It is a development strategy that mirrors regional planning and smart growth principles intended to preserve remaining open space and natural habitat, reduce green house gas emissions, and focus development in areas with available public infrastructure. The CPUs incorporate the Regional Comprehensive Plan (RCP) Smart Growth strategy through the designation of high-density mixed-use "villages" along transit corridors. These villages provide for the coordination of land use and transportation planning to create compact, connected pedestrian-friendly activity centers. Complementing the RCP's regional

approach to smart growth, the CPUs provide local incentives to implement transit-oriented development at the community level through parking reductions, density transfers, and FAR bonuses for publicly-accessible open space.

The CPUs are consistent with the General Plan's City of Villages Strategy, which was designed to sustain the long-term environmental health of the City and its many communities. As with the General Plan, the CPUs place an emphasis on directing population growth into mixed-use activity centers that are pedestrian-friendly and linked to an improved regional transit system. The Land Use Elements of the CPUs incorporate the City of Villages Strategy by designating two transit-oriented (village) centers: the Southeastern Village District in Southeastern San Diego, and the combined Euclid and Market Village and Imperial Avenue Village Districts in the Encanto Neighborhoods. Each CPU has a set of village-specific land use policies intended to concentrate development along key corridors in close proximity to high frequency mass transit (trolley stops). Multiple policies in the CPUs promote mixed uses and walkability along corridors by requiring or encouraging ground floor commercial spaces and by detailing street-level design elements that activate storefronts and create an attractive public realm. The CPUs use two designations "Active Frontage Required" and "Active Frontage Permitted" to promote pedestrian-oriented development along appropriate streets. These designations work in conjunction with the CPUs' land use frameworks to define activities and capacities. The CPUs also contain standards and incentives to support transit-oriented development, such as parking reductions and density transfers.

The Southeastern Village includes the Commercial/Imperial corridor from Interstate 5 to Interstate 15, and is centered on the trolley stops at 25<sup>th</sup> Street and 32<sup>nd</sup> Street. This Village will build upon the existing character of this highly urban community and will contain a mix of uses, with higher density allowed near the high frequency 25<sup>th</sup> Street and 32<sup>nd</sup> Street transit stops as well as along Imperial Avenue, preserve industrial lands along Commercial Street, as well as promote new commercial, residential, and mixed-use development throughout the Village area, sensitively designed to integrate into the existing community character. The Historic Districts of Sherman Heights and Grant Hill will be respected and preserved while allowing planned infill development that is sensitive to the existing and evolving community character.

The Village at Market Creek and Imperial Avenue Village is envisioned as the mixed-use center of Encanto Neighborhoods and the center of the community. This Village includes the Euclid Avenue, 47<sup>th</sup> Street, and 62<sup>nd</sup> Street trolley stations. It is planned to grow into a dynamic higher density mixed-use hub that caters to the needs of the existing and evolving community. The integration of commercial and residential uses is emphasized in the Villages, including uses such as retail, professional/administrative offices, commercial, entertainment, recreation facilities, and service industries. The Community Plan envisions that the Village will draw on the existing cluster of activities and the high level of transit access at the 47<sup>th</sup> Street, Euclid Avenue and 62<sup>nd</sup> transit stations. It will include a diversity of housing types, employment and retail uses, and public realm enhancements. Furthermore, a specific strategy for preserving and enhancing Chollas Creek will be realized.

As stated in the CPUs, the majority of growth and development will occur within the three designated Village areas that are located along the established transit/trolley infrastructure. Thereby focusing growth and development away from the established lower density

neighborhoods and instead along the transit corridors and nodes. However, there are policies contained in each CPU that support diverse housing opportunities for Southeastern San Diego and Encanto Neighborhoods residents, including affordable housing opportunities within the two Villages. Within each new Village, the CPUs encourage quality neighborhood- and community-serving commercial uses that will provide needed services in the future.

By providing a balanced land use plan that incorporates a variety of land uses to promote vibrant compact and walkable villages that are less reliant on automobiles thereby reducing GHG emissions, the CPU is consistent with the General Plan's land use, housing, conservation and economic prosperity goals and policies. These specific factors support the decision to approve the CPUs despite the significant unavoidable impacts identified in the PEIR.

### **3. Plan adoption and implementation will support the City of Villages strategy through the implementation of additional housing and mixed uses near job/employment centers**

The CPUs support an increase in the number of potential residential units, within each of the new villages. This will contribute to the City of San Diego's ability to accommodate projected housing demand adequately served by public transit. As a result, the goals, policies and objectives of the General Plan and the CPUs with respect to Housing and Transportation would be adequately met.

The proposed CPUs provide affordable single and multi-family housing throughout the proposed CPU areas, thus enabling a wide range of economic levels and age groups to live within these communities. By facilitating this diversity, multiple generations of families can live together throughout their lifetime. Specifically, the Encanto Neighborhoods Land Use Element includes Affordable Housing Policies LU-22, LU-23, LU-25, LU-26, LU-30, and LU-59 through LU-63 that do the following: promote and encourage the development of very low and low income affordable housing in all residential and multi-use neighborhood designations; create affordable home ownership opportunities for moderate income buyers; and use land use, regulatory, and financial tools to facilitate the development of housing affordable to all income levels. The SESD Land Use Element contains policies LU-21 through LU-27 relate to the production of affordable housing units

The CPUs provide a consistent, comprehensive approach to balancing new housing with the retention of non-residential land and building supply in the Southeastern San Diego and Encanto Neighborhoods. The CPUs provide new housing, including affordable housing, in the designated Village areas, which would also accommodate neighborhood-serving commercial uses and services. The CPU's designation of the villages would allow denser, more transit-oriented neighborhoods, than currently exists in Southeastern San Diego and Encanto Neighborhoods. Within Southeastern San Diego, the adopted land use designations do not allow for mixed-use development and also limit densities to low to medium density. The CPU focuses the new housing and job growth in areas that are transit-oriented and promote multi-modal opportunities. Consequently, the CPU would reduce reliance on private automobile use.

For all of these reasons, the CPUs provide a comprehensive means of implementing the City of Villages strategy with workforce housing located in transit oriented villages and supported by

commercial and industrial uses to provide employment opportunities, while enhancing multi-modal choices and reducing GHG emissions.

**4. The CPUs provides more effective means to protect and enhance character and function than existing land use controls.**

The CPU areas are largely urbanized and built out with pockets of open space contained within canyons and along Chollas Creek. The CPUs build upon the adopted Community Plan's goal for respecting the existing character of the communities while strengthening linkages and connectivity, improving the built environment, creating mixed-use walkable neighborhoods and preserving open space. The CPUs seek to encourage an urban form that reflects the existing and evolving character of both communities and provides an attractive built environment while simultaneously protecting the canyons and creek areas.

Development completed in accordance with the CPUs would occur in an existing urbanized area with established public transportation infrastructure, which may reduce vehicle trips and miles traveled and support walking as a transportation choice. In addition, implementation of the policies contained in the Land Use, Mobility, Recreation, and Conservation Elements of the proposed plans would improve mobility within the plan areas, including open space and recreation areas through the development of a balanced, multi-modal transportation network. Implementation of proposed Land Use Policies 3 through 17 (Encanto) and Land Use Policies 3-10 (Southeastern San Diego) supports the integration of transit within mixed use residential and employment areas and encourages the creation of safe and direct bicycle and pedestrian connections to provided multi-modal access.

The Land Use Elements define Village District areas and key corridors where future growth is targeted within both communities in order to fulfill the General Plan's City of Villages strategy. As part of these Villages, both land use elements provide for density incentives for transit-oriented development. These incentives can be found in Tables 2-6 (both Community Plans) and include shared parking and reduced parking requirements, a transfer of development rights transfer program within the Encanto Village at Market Creek and Imperial Avenue Village areas are intended to spur development flexibility and new transit-oriented mixed use development surrounding the existing trolley stops.

The Recreation and Conservation Elements contain policies aimed at improving public access to local and regional passive and active recreational opportunities through the creation of bicycle and pedestrian pathways linkages to such areas as Las Chollas Creek and the existing park system in both communities. While the intent of the Mobility Elements is to provide a more cohesive transportation network, policies MO-10 through MO-14 in both CPUs specifically address transit services and facilities, including highlighting the presence of trolley stations, improving the environment surrounding bus and trolley stops, and working with MTS to incorporate measures to improve personal safety at bus and trolley stops. Urban Design Element Policies 4.2-1 through 4.2-10 encourage pedestrian-oriented design, multi-modal connections, and streetscaping that will promote walkability and support both the village concepts.

The CPU provides for growth and development through the assumed buildout year of 2035 by providing a foundation for development that builds on Southeastern San Diego and Encanto Neighborhoods's established character as urbanized areas that are close to major employment

centers. These specific factors support the decision to approve the project despite the significant unavoidable impacts identified in the FEIR.

**5. The CPU promotes the City's Complete Streets policy by restoring a more balanced street environment that prioritizes public transit, walking, and bicycling over private vehicle movement.**

Effective January 1, 2011, state law requires that cities address complete streets upon revisions to their general plan circulation elements. The specific requirement is to “plan for a balanced, multimodal transportation network that meets the needs of all users of streets, roads, and highways for safe and convenient travel in a manner that is suitable to the rural, suburban, or urban context of the general plan.” The City’s General Plan Mobility Element as adopted in 2008 meets this requirement. In fact, the Mobility Element is cited as an example of a general plan that has multi-modal goals and policies, and the City’s Street Design Manual is listed as an example of a multi-modal transportation implementation document in the “Update to the General Plan Guidelines: Complete Streets and the Circulation Element,” published by the State Office of Planning & Research (December 2010).

The proposed CPUs include several policies aimed at improving the existing transportation network, as well as encouraging alternative modes of transportation to reduce impacts related to traffic/circulation and air quality. The Mobility Elements in both CPUs support and help to implement the General Plan at the community plan level by including specific goals, policies, and recommendations that will improve mobility through the development of a balanced, multi-modal transportation network. Specifically, the Mobility Elements include Walkability Policies MO-1 through MO-6 in both community plans, which promote and encourage the new construction of, and upgrades to, existing pedestrian pathways; Transit Policies MO-10 through MO-14 in both plans, which improve access to public transit facilities (i.e., San Diego trolley); Transportation Demand Management Policies MO-24 through MO-26 (Encanto) and MO-23 through MO-25 (SESD), which promote use of transit services by encouraging employers and new residential development to provide transit passes to employees and/or residents; and Bicycle Policies MO-7 through MO-9 in both plans, which promotes a continuous network of bicycle facilities connecting the proposed CPU areas to the citywide bicycle network and bicycle parking facilities. In support of General Plan Policies UD-D-1 through D-3, the SESD Land Use Element Policy LU-3 focuses the highest intensity development (residential and non-residential) on both Commercial Street and Imperial Avenue around the trolley stops to capitalize on access to transit, boost transit ridership, and reduce reliance on driving. The Encanto Neighborhoods LU-3 policy encourages implementing the City of Villages concept for mixed-use transit oriented development as a way to minimize the need to drive by increasing opportunities for individuals to live near work, offering convenient mix of local goods and services, and providing access to high quality transit.

The CPU will encourage alternative transportation and aim to reduce vehicle miles traveled (and greenhouse gas emissions) throughout Southeastern San Diego and Encanto Neighborhoods through a variety of transportation, pedestrian safety, and open space improvements that are included in the Urban Design, Mobility, Recreation, and Conservation elements. The two proposed villages are consistent with the smart growth land use pattern called for in SANDAG’s Regional Comprehensive Plan and the multi-modal approach is also consistent with the direction



provided by SB 375 to reduce GHG emissions associated with vehicle miles traveled from cars and light trucks while also addressing housing needs.

As part of the CPU's Mobility Element, an enhanced transit system is envisioned. The CPUs support, refine, and implement the City's Bicycle Master Plan within the Southeastern San Diego and Encanto Neighborhoods area. This includes the provision of a Class IV Cycle-track along Market Street. Class II bikeways would be provided along all new classified streets in Southeastern San Diego and Encanto Neighborhoods. The CPU also encourages bikeways within the village areas to connect to trail heads with access to the canyon and creek system trails and pathways.

The proposed CPU's serve to reduce parking related impacts by reducing the parking footprint within the plan areas and encouraging alternative modes of transportation. In addition to the reduction in visual impacts associated with parking surfaces, by limiting surface parking in the plan areas, the associated adverse environmental effects (e.g., grease and oil from leaking vehicles) would be decreased while at the same time reducing microclimate temperature associated with large expanses of paved surface area. In support of this goal, the proposed Mobility and Urban Design Elements include policies related to parking.

Specifically, Mobility Element Parking Policy MO-26 (SESD) and MO-28 (Encanto) permits construction of public parking garages that include shared parking arrangements that efficiently use space, are appropriately designed, and reduce the overall number of off-street parking spaces required for development. Mobility Element Policy MO-27 (SESD) and MO-29 (Encanto) encourages that parking spaces be rented, leased or sold separately from new residential or commercial space in order to increase their use within the community. Mobility Element Policy MO-29 (SESD) and MO-31 (Encanto) identifies the possibility of establishing a parking in-lieu fee for new development that would contribute to implementation of parking demand reduction strategies, as well as potentially fund parking structures within the community. In addition, Urban Design Element Policy UD-112 (Encanto) and UD-113 (SESD) aims to minimize the land area dedicated to parking, and Policy UD-113 encourages the wrapping of at-grade parking with active uses, leaving building frontages and streetscapes free of parking facilities.

The CPUs provide for the use of street design and traffic calming/management solutions to improve pedestrian safety and also includes an Urban Design Element, which encourages the village design to be both pedestrian and transit-oriented with goals and policies for activating vibrant village cores with attractive streetscaping, public art, architecture, and public facilities.

These specific factors support the decision to approve the project despite the significant unavoidable impacts identified in the PEIR.

**6. The CPU implements the City's goal to incorporate its General Plan policies and goals into its neighborhoods as part of its long term community plan update process.**

The CPUs are superior in meeting the General Plan's Guiding Principles and the goals generated by the community planning group and stakeholders because it maintains established low density neighborhoods and the designated historic districts, provides employment lands, and increases residential development opportunities along the existing transit corridors to densities that support transit. Future growth and development will be focused within the two new transit/pedestrian-oriented compact mixed-use villages that will afford a wide variety of housing types and

densities that increase the overall residential density of the planning areas. The CPUs implement the major goals of the City's Housing Element with the provision of sufficient housing for all income groups and providing affordable housing opportunities consistent with a land use pattern which promotes infill development and socioeconomic equity, while facilitating compliance with all applicable federal, state, and local laws and regulations.

The alternatives considered include the No Project Alternative, the Reduced Density Alternative, and the Increased Density Alternative. Based on a comparison of the alternatives' overall environmental impacts and their compatibility with the CPUs' goals and objectives, the No Project Alternative is the environmental superior alternative for this Program EIR, since overall development would be less than any of the other alternatives. However, the No Project Alternative does not meet the purpose and objectives of either CPU, including identifying land use and mobility strategies to cohesively guide growth and development in Southeastern San Diego and Encanto Neighborhoods, foster walkable and transit-oriented communities, and address a range of long-range planning topics. Other key goals include meeting the vision and guiding principles for Southeastern San Diego of a diverse, inclusive, and vibrant place to live and work, and for Encanto Neighborhoods of a scenic, vibrant and healthy community. These purposes and objectives are described in further in Chapter 2 (Project Description) and are supported by specific objectives, CPU land use changes, and CPU policies.

Of the remaining alternatives, the environmentally superior alternative is the Lower-Density Alternative. 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. As with the CPUs, the Lower-Density Alternative would have significant and unavoidable impacts in the areas of transportation, air quality, and noise.

The increased residential density included in the preferred land use plans will assist in meeting the City's affordable housing needs and implement the CPU's housing policies, found in the Land Use Element's Section 2.2 and the General Plan's Land Use Element policies in Section H, Balanced Communities and Equitable Development, for a mix of housing types and the integration of affordable housing within village areas. Both villages are consistent with the General Plan's guiding principles, the City of Villages strategy, and the CPU policies for diverse, balanced, compact, and walkable mixed-use villages that are linked to public facilities, to recreation opportunities, and to employment centers by walkways, bikeways, transit, roadways, and freeways. The CPUs Urban Design Elements and the General Plan's Urban Design Element policies UD-A.1 – UD-A.17 contained in Section A General Urban Design, policies UD-B.1 – UD-B.8 in Section B Distinctive Neighborhoods and Residential Design, and policies UB-C.1-UD-C.8 in Section C Mixed-Use Villages and Commercial Areas provide policy direction for village areas, streetscape improvements, building character, street trees, and sustainability features, gateways, and view corridors that respect the community's natural setting, strengthens linkages and connectivity, improves the built environment, and creates mixed-use walkable villages.

These fundamental recommendations that are based on the General Plan policies cited not only will create diverse new housing near job/employment centers with transit opportunities; but will maintain the existing low density neighborhoods and historic districts, preserve open space resources while intensifying the nodes surrounding the transit stations and along the transit corridors in Southeastern San Diego and Encanto Neighborhoods. Therefore, the CPUs are consistent with the General Plan's Guiding Principles and each Community Plans land use goals that were generated with the community during the update process. These specific factors support the decision to approve the project despite the significant unavoidable impacts identified in the PEIR.

## **I. CONCLUSION**

For the foregoing reasons, the City finds that the Project's adverse, unavoidable environmental impacts are outweighed by the above-referenced benefits, any one of which individually would be sufficient to outweigh the adverse environmental effects of the project. Therefore, the City has adopted this Statement of Overriding Considerations.