



Ownership Disclosure Statement

Approval Type: Check appropriate boxes for type of approval(s) requested:

- | | | |
|--|---|---|
| <input type="checkbox"/> Limited Use Approval | <input type="checkbox"/> Neighborhood Development Permit | <input type="checkbox"/> Centre City Development Permit |
| <input type="checkbox"/> Temporary Use Permit | <input type="checkbox"/> Planned Development Permit | <input type="checkbox"/> Gaslamp Quarter Development Permit |
| <input type="checkbox"/> Neighborhood Use Permit | <input checked="" type="checkbox"/> Site Development Permit | <input type="checkbox"/> Marina Development Permit |
| <input type="checkbox"/> Conditional Use Permit | <input type="checkbox"/> Coastal Development Permit | <input type="checkbox"/> Other: _____ |

Project Title: ELABELLE

Project Address: 454 13th ST, SAN DIEGO, CA 92101

Assessor Parcel Number(s): 535-156-08-00

Part 1 – To be completed by property owner when property is held by individual(s)

By signing this Ownership Disclosure Statement, the property owner(s) acknowledges that an application for a permit, map, or other matter, as identified above, will be filed with Civic San Diego on the premises that is the subject of the application, with the intent to record an encumbrance against the property or properties. List below the owner(s) and tenant(s) (if applicable) of the above referenced property or properties; all subject properties must be included. The list must include the names and addresses of all persons who have an interest in the property or properties, recorded or otherwise, and state the type of property interest (e.g., tenants who will benefit from the permit, all individuals who own the property or properties). Original signatures are required from at least one property owner for each subject property. Attach additional pages if needed. Note: The Applicant is responsible for notifying the Project Planner of any changes in ownership during the time the application is being processed or considered. Changes in ownership are to be given to the Project Planner at least thirty days prior to any public hearing on the subject property or properties. Failure to provide accurate and current ownership information could result in a delay in the hearing process.

Additional pages attached: ☐ Yes ☐ No

Name of Individual (type or print):

Assessor Parcel Number(s): _____

Street Address: _____

City/State/Zip Code: _____

Phone Number: _____

E-mail: _____

Signature: _____

Date: _____

Name of Individual (type or print):

Assessor Parcel Number(s): _____

Street Address: _____

City/State/Zip Code: _____

Phone Number: _____

E-mail: _____

Signature: _____

Date: _____

Project Title: EZABELLE**Part 2 – To be completed by property owner when property is held by a corporation or partnership**

By signing this Ownership Disclosure Statement, the property owner(s) acknowledges that an application for a permit, map, or other matter, as identified above, will be filed with Civic San Diego on the premises that is the subject of the application, with the intent to record an encumbrance against the property or properties. List below the names, titles, and addresses of all persons who have an interest in the property or properties, recorded or otherwise, and state the type of property interest (e.g., tenants who will benefit from the permit, all corporate officers, and/or all partners in a partnership who own the property or properties). Original signatures are required from at least one corporate officer or partner who own the property for each subject property. Attach additional pages if needed. Provide the articles of incorporation, articles of organization, or partnership agreement identifying all members of the corporation or partnership. Note: The applicant is responsible for notifying the Project Planner of any changes in ownership during the time the application is being processed or considered. Changes in ownership are to be given to the Project Planner at least thirty days prior to any public hearing on the subject property or properties. Failure to provide accurate and current ownership information could result in a delay in the hearing process.

Additional pages attached: ☐ Yes ☐ No**Corporation/Partnership Name (type or print):**

NDD ON 13TH ST LOFTS, LLC
☐ Corporation ☒ LLC ☐ Partnership

Assessor Parcel Number(s):

535-156-08-00

Street Address:

340 15TH ST, SUITE #1

City/State/Zip Code:

SAN DIEGO, CA 92101

Name of Corporate Officer/Partner (type or print):

SOHEIL NAKHSHAB

Title:

MANAGER

Phone Number:

(619) 255-7257

E-mail:

SOHEIL@NDDINC.NET

Signature:

Date:

2-21-18**Corporation/Partnership Name (type or print):**

NAKSHAB DEVELOPMENT & DESIGN, INC
☒ Corporation ☐ LLC ☐ Partnership

Assessor Parcel Number(s):

Street Address:

340 15TH ST, SUITE #1

City/State/Zip Code:

SAN DIEGO, CA 92101

Name of Corporate Officer/Partner (type or print):

SOHEIL NAKHSHAB

Title:

ARCHITECT / PROJECT MANAGER

Phone Number:

(619) 255-7257

E-mail:

SOHEIL@NDDINC.NET

Signature:

Date:

2-21-18

Project Title: _____

Part 3 – To be completed by all other financially interested parties

List below the names, titles, and addresses of all financially interested parties and state the type of financial interest (e.g., applicant, architect, lead design/engineering professional). Original signatures are required from at least one individual, corporate officer, and/or partner with a financial interest in the application for a permit, map, or other matter, as identified above. Attach additional pages if needed. Note: The applicant is responsible for notifying the Project Planner of any changes in ownership during the time the application is being processed or considered. Changes in ownership are to be given to the Project Planner at least thirty days prior to any public hearing on the subject property or properties. Failure to provide accurate and current ownership information could result in a delay in the hearing process.

Additional pages attached: ☐ Yes ☐ No

Name of Individual (type or print):

☐ Applicant ☐ Architect ☐ Other _____

Street Address: _____

City/State/Zip Code: _____

Phone Number: _____

E-mail: _____

Signature: _____ Date: _____

Corporation/Partnership Name (type or print):

☐ Corporation ☐ LLC ☐ Partnership
☐ Applicant ☐ Architect ☐ Other _____

Street Address: _____

City/State/Zip Code: _____

Name of Corporate Officer/Partner (type or print): _____

Title: _____

Phone Number: _____

E-mail: _____

Signature: _____ Date: _____

Name of Individual (type or print):

☐ Applicant ☐ Architect ☐ Other _____

Street Address: _____

City/State/Zip Code: _____

Phone Number: _____

E-mail: _____

Signature: _____ Date: _____

Corporation/Partnership Name (type or print):

☐ Corporation ☐ LLC ☐ Partnership
☐ Applicant ☐ Architect ☐ Other _____

Street Address: _____

City/State/Zip Code: _____

Name of Corporate Officer/Partner (type or print): _____

Title: _____

Phone Number: _____

E-mail: _____

Signature: _____ Date: _____



1.3 Ezabelle Project Description

The Proposed Project, Ezabelle, is a new Affordable mixed-use building consisting of Residential Apartments and Ground Floor Commercial to activate the street. We have designated the existing home as a Historic Resource and will incorporate it into the new development.

The current site, 454 13th Street, is a approximately 4,200 sf interior lot located on 13th street, between Island and J Street. Along the South and East Property Line there is an adjacent 6-story apartment building. Along the North Property Line there is an existing 3-story Historic Home currently being used as a law office. The Gross Square Footage of Ezabelle will be approximately 26,491sf within a new 85 ft tall 7-Story Concrete Structure. The project will consist of 48 new residential apartments and 1 large ground floor commercial space. 12% of our units will be dedicated to Very Low Income Tenants. No Parking will be included in the building design as a means of sustainable practices. The new project will capitalize on the public amenities the metro area has to offer: Access to the Trolley Station which is less than a block from the site and the creation of a micro community within the proposed commercial ground floor spaces. The building will create a large courtyard space open to the sky to allow for better quality of life and to create a indoor/outdoor gathering space for the community.

All Residential Units will be fully equipped with modern amenities. The concept for the units is based on a Swiss Army Knife. All fixtures/Appliance/Furniture will be built in to the residential units. High-End Cabinetry will run across the entire wall lengths housing independent Washer-Dryers, Dishwashers, Kitchens, Water Heaters, Beds, Storage, benches, etc.... The building will also be designed and built to meet the standards for LEED Certification. Ezabelle will most likely achieve LEED Platinum status making it sustainable for the future tenants and the city as a whole.



1.4 Ezabelle Architectural Narrative

San Diego is experiencing a housing crisis. It is becoming more and more difficult for people to afford homes within our city. Quality Housing at an affordable price point does not exist in our city. The increased cost of living has created a major influx in our city's population growth. A rapidly growing population and a lack of quality, affordable living is the issue that we are addressing with the Ezabelle development.

Many people live in San Diego while attending school or during the early stages of their professional careers. Trying to establish roots in our city is very expensive. The high real estate costs have triggered more demand for rental properties. Unfortunately, the rental market is also very costly for residents. The increase rents force people to live with roommates, or live outside the metro setting. Keeping these factors in mind, Nakhshab Development and Design, Inc. feels there is a need to provide affordable quality modern living for our local residents.

When designing Ezabelle, we decided to create a product that would be considered a design standard in international cities. Our building concept is based on the Swiss army knife as it is comprised of small compact apartments fully outfitted with a variety of modern features. The compact home will be more efficient than a large 2 bedroom apartment. Less will be demanded of our tenants as they will not need to spend as much money on furnishings, fixtures, and appliances.

Our concept for Ezabelle is derived from our value at Nakhshab to elevate quality of life. We design buildings as if we were living in them ourselves. Some elements that we have incorporated into this project that will enhance the quality of life include the following: Our building will be constructed of concrete, creating a more durable structure and helping with sound attenuation for our tenants comfort. Expansive floor to ceiling doors and windows have been incorporated into the design creating an abundance of natural light and ventilation throughout all units.

The current project site contains a historically designated single family home (John and Mary Wright House) built in 1882. We will be leaving the house on the site and building over the profile maintaining the historic integrity of this Italianate Style residence. The building will be built to follow LEED Platinum standards creating a sustainable, healthy, affordable living space for our residents. The ground level communal courtyard adjacent to the commercial space will create a community within our property and the surrounding neighborhood. This space will be open to both our tenants and the public. Other amenities within our building include the common rooftop deck which will provide outdoor dining, lounge, gardening, and potentially a swimming pool.

Economic Feasibility for Parking Incentive

Ezabelle Project

APN: 535-156-08-00

The Goal of the following is to provide a thorough written justification for the use of an incentive to reduce the parking requirements from 12 spaces to zero spaces. It will provide an economic analysis which explains why the project would be infeasible if the parking requirement is not eliminated.

Per SDMC Section 143.07, the provision of 12% Very Low Income units allows three incentives to deviate from the development regulations.

§143.0740 Incentives in Exchange for Affordable Housing Dwelling Units

(d) The number of incentives available are identified in Table 143-07A for very low income households, Table 143-07B for low income households, and Table 143-07C for moderate income households consistent with the percentage of pre-density bonus units identified in the first column of each table.

Table 143-07A
Very Low Income Density Bonus Households

Percent Very Low Income Units	Percent Density Bonus	Number of Incentives
12	38.75	3

*** Applicable portion of official table shown

With 12% Very Low Income, the parking ratio may be reduced from one space per unit to 0.5 spaces per bedroom. With 48 units, at least 6 units must be Very Low Income to take advantage of the Affordable Housing Bonus Parking ratio, which results in 24 required spaces.

Table 143-07D
Parking Reduction for Proximity to Transit

Type of Development	Percent Affordable	Transit Requirement	Parking Ratio for Development
<i>Rental or for-sale development containing market rate and low income and/or very low income dwelling units</i> VERY LOW INCOME LOW INCOME	11% 12%	<i>The development is located within a Transit Priority Area</i>	<i>0.5 spaces per bedroom</i>

*** Applicable portion of official table shown

Additionally, the CCPDO allows for a Small Lot Reduction for lots of 5000 sq. ft. or less to reduce required parking by 50%. The required parking is further reduced from 24 to 12 spaces.

Applying one of the three Incentives, we would like to further reduce our parking to zero spaces.

The justification for this reduction is based on multiple variables which affect the economics of the project in a major way.

Current parking requirements serve to reduce and/or eliminate our ability to provide affordable units, in most cases making it an economically infeasible endeavor altogether.

For the sake of being thorough we have outlined 4 parking alternatives to the base case proposed, however the reality is that including parking would be very challenging to accommodate due to life safety requirements and the small lot size.

However, if we assume somehow that these limitations are surmountable then we must look at the economic picture for each alternative.

Base Case:

In this case the project will provide no on-site parking, however at least 2 off-site parking spaces plus 2 motorcycle spaces would be established due to the elimination of the existing curb cut and driveway on 13th street.

Alternative I:

To accommodate the required 12 parking spaces and the fact that the project will have a subterranean vault element for the transformer which will take up a considerable footprint of the lot, this alternative explores creating 2 subterranean basement levels. One needs to consider the cost of building these levels, grading and excavation, shoring and an elevator lift plus the extension of both exit stair elements to access both parking levels.

Alternative II:

This alternative will explore only 1 subterranean level below the vault level. This basement parking level will have to encompass higher floor to ceiling heights to accommodate a stackable tandem parking option. The costs to consider here are the cost of building out the level, grading and excavation, shoring, hydraulic lifts for the vehicles and an elevator lift plus extension of both exit stair elements to access both parking levels.

Alternative III:

This alternative explores parking on grade which would involve the loss of all commercial elements on the ground floor, hydraulic lifts, loss of amenity value for the tenants, increase in rents to accommodate loss of revenue thereby restricting or eliminating very low income housing.

Alternative IV:

In this alternative we explore 2 levels of above grade parking which would save the commercial element on the ground floor but would severely limit the number of residential units and completely eliminate very low income and low income housing altogether. The costs which need to be considered are the building of 2 levels above grade, elevator lift, loss of rental units.

The table below outlines the breakdown of costs for each alternative mentioned above:

Incremental Costs of Parking Alternatives

		Incremental or Capitalized cost of Parking	Current Project Costs	Total Project Cost Including Parking	Capitalized Value of Project	Value Created
	Base Development					
	2 off site vehicular spaces plus 2 motorcycle	\$0.00				
Base	Total Cost	\$0.00	\$8,497,934.00	\$8,497,934.00	\$9,848,448.00	\$1,350,514.00
		Cost				
	2 Subterranean levels below grade					
	2 basement levels	\$840,000.00				
	Grading & Excavation	\$400,000.00				
	Shoring	\$750,000.00				
	Elevator lift	\$250,000.00				
Alternative I	Total Cost	\$2,240,000.00	\$8,497,934.00	\$10,737,934.00	\$9,848,448.00	-\$889,486.00
	Tandem Parking level below grade					
	1 level with stacked tandem parking	\$735,000.00				
	Grading & Excavation	\$400,000.00				
	Shoring	\$750,000.00				
	Hydrolic lifts (6)	\$60,000.00				
	Elevator lift	\$250,000.00				
Alternative II	Total Cost	\$2,195,000.00	\$8,497,934.00	\$10,692,934.00	\$9,848,448.00	-\$844,486.00
	On Grade Tandem Parking					
	Loss of commercial element (2 units)	\$957,866.67				
	Hydrolic lifts	\$60,000.00				
	Loss of Residential units (2 units)	\$693,333.33				
	Loss of amenity value	\$250,000.00				
	elimination of affordable units					
Alternative III	Total Cost	\$1,961,200.00	\$8,497,934.00	\$10,459,134.00	\$9,848,448.00	-\$610,686.00
	2 Levels above grade parking					
	2 levels of parking	\$840,000.00				
	Elevator lift	\$250,000.00				
	Loss of Residential units (16 units)	\$5,546,666.67				
	Elimination of affordable units					
Alternative IV	Total Cost	\$6,636,666.67	\$8,497,934.00	\$15,134,600.67	\$9,848,448.00	-\$5,286,152.67

Beyond the clear economic challenges which the inclusion of parking brings to the proposed project, the small Lot size creates many ancillary challenges. The lot is only 42ft in width. Given the height of the building we need to setback our proposed structure 1ft on all shared property lines. This reduces our

usable lot width to 40ft. Factoring in the building wall thickness along each property line at 1ft thick concrete walls reduces the useable lot width to 38ft. Now we incorporate the required life safety elements, two exit stairs, gurney compliant elevator, egress court and corridors we are left with very limited space to accommodate vehicular parking on grade. We are forced to go below grade if we are to provide any parking. As demonstrated above, the costs of doing so eliminate affordable units altogether and likely make it impossible even for market rate units in this area since there is only so much one can increase rents on a 300 sq. ft. studio apartment.

Subterranean parking creates its own challenges as well since the proposed project already has a large basement that we need to construct dedicated solely to the utility company for our electric transformer, switchgear and meters.

The footprint of this vault covers nearly 1/3 of the overall site. There is no way of building a driveway or driveway ramp so we are forced to incorporate a parking lift to transport vehicles to the basement levels.

A lift, although would solve this issue, is infeasible as it would be located in the middle of the egress path causing non-compliance issues with the California Building Code Exiting Requirements.

Assuming for a moment that the lift could be installed the Utility Vault forces us to build two stories below grade in order to provide the 12 parking spaces. We will need to extend our 2 exit stairs and elevator to service both of these basement levels as well.

The economic consequences of providing parking on this small lot would be so detrimental that we cannot justify developing the much needed Very Low Income Housing.

The base project as it stands will create 6 Very low-income and 42 Market which are priced to be on the cusp of 80% AMI. Unfortunately to create parking we would undoubtedly need to eliminate all affordable units to be able to shore the losses which stem from any alternatives presented above.

Ezabelle project is a prime example of Transit Oriented Development. We are located adjacent to one of the main trolley stations within metro San Diego. Our goal is to provide a rental option for people without vehicles and to promote the use of the easily accessible public transit. With the expansion of the Trolley line to La Jolla we hope to draw students and professionals into the downtown core.

Finally, as outlined in several studies including a parking study provided to the City of San Diego in 2011 by Wilbur Smith Associated, or by Circulate San Diego in 2016 or by the San Diego Housing commission in 'Addressing the Housing Affordability Crisis', quite often parking requirements can make development unfeasible in San Diego unfortunately.

Parking development costs in San Diego can account for up to 20 percent of a developer's direct costs, which are eventually passed on to final consumers. Given the magnitude of these costs, they have a large impact on overall project feasibility and end-consumer housing prices. The construction cost per parking spot ranges from \$10,000 (ground level) to \$70,000 (below ground). The City of San Diego has particularly conservative parking requirements, setting parking ratios that create an expensive bundling,

whereby residents who do not own cars or use less than the full amount of parking spaces allocated to them are burdened with unnecessary construction costs.

Although this bundling effect generally applies to all types of parking minimums, the level of bundling appears particularly strong in the City of San Diego, where parking ratios are up to two times those of peer cities and where parking minimums are set even around transit-rich areas, such as downtown. The opportunity to reduce parking ratios could be particularly salient to the City of San Diego, whose demographics are younger than most other metro areas in the nation. Changing trends in car ownership among younger age groups that are more likely to utilize alternatives, such as ride-sharing and public transportation, provide an opportunity to relax regulations. Relaxing parking requirements could have a significant impact on the feasibility of housing developments. This study and objectives manual is enclosed for your reference.

Our mission ultimately is to create rich, sprawling, walkable neighborhoods in which green transportation habits are adapted in a departure from the car centric society which has contributed to San Diego's air quality issues as recently reported by the San Diego Tribune.

We firmly believe, as proven by several progressive cities around the country, the provision of adequate resources for young or low income individuals eliminates the need for the expensive proposition of vehicle ownership.

Thank you for your attention to this matter.



Nakhshab Development & Design
340 15th Street – Suite 1
San Diego, CA 92101
619.255.7257



May 2, 2018

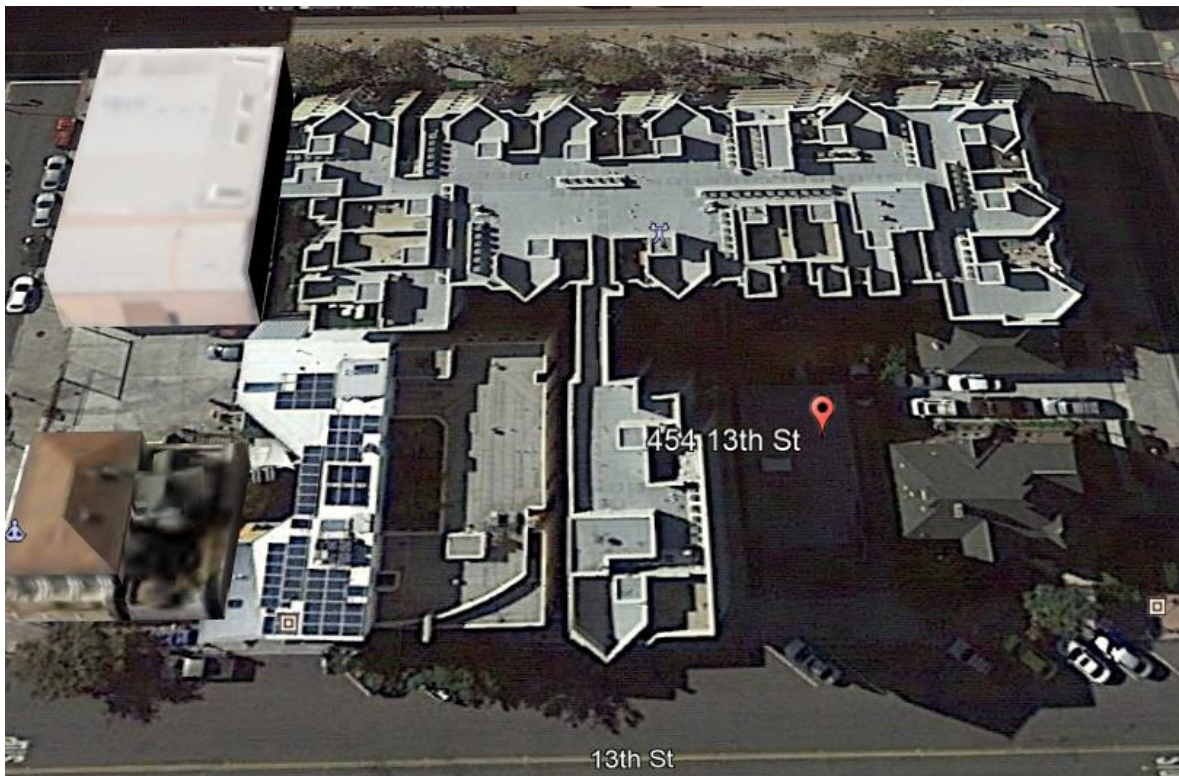
Nakhshab Development & Design
340 15th Street
Suite 1
San Diego CA 92101

ATTN: Soheil Nakhshab
Email: soheil@nddinc.net

**RE: Economic Feasibility of Alternatives for the Property at 454
13th street (Ezabelle) in Downtown San Diego**

Dear Mr. Nakhshab:

This report considers the base case and four alternatives for the development of an affordable rental apartment complex on the 4,200 square foot lot located at 454 13th Street between Island Avenue and J Street in downtown San Diego.





As planned, the entire site would be developed with a seven-story concrete structure containing 48 studio apartments with an average size of 300 square feet. There would be no on-site parking.

454 13th Street will include 88% market rate units and 12% units to accommodate households that have 50% of Area Median Income.

Market rents would be approximately \$1,300 per month. The market rate units coincide closely with rents at 80% of the Average Median Income in San Diego County.

80% Area Median Income (AMI) Studio Units (1 Occupant) Rent City of San Diego				
80% of AMI Low Income	Monthly Rent (2)	Less Utility Allowance (1)	Cash Rent	
\$ 50,950	\$ 1,274	\$ 45	\$ 1,229	

(1) Based on SD Housing Commission Schedule
(2) U.S.Dept. of Housing & Urban Development


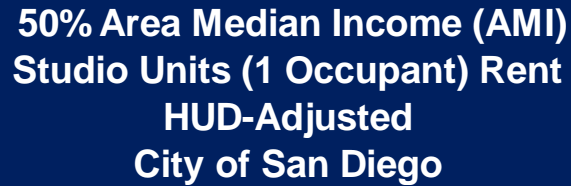


Exhibit 1-A

12% of the units would have rents that would be based on the U.S Department of Housing and Urban Development schedule of 50% Average Median Income (AMI). Single occupants could have an AMI of \$31,850.



(1) Based on SD Housing Commission Schedule
(2) U.S.Dept. of Housing & Urban Development



Architectural rendering of a two-story residential building. The building has yellow horizontal siding, white trim around the windows and doors, and a white cornice with green decorative elements. Large dark-framed windows are on the upper floor. A red brick walkway leads along the side of the building, which has a covered outdoor area with orange seating and white spherical pendant lights. A circular inset in the bottom right corner shows a site plan with the building location highlighted in red.

NO
NORTH OAK
RESIDENTIAL DISTRICT

ARCHITECTURE
LANDSCAPE
INTERIOR
DESIGN
300 WEST 10TH AVE
SAN DIEGO, CA 92101
619.255.1234

DATE: 01/15/2020
DRAWN BY: J. L. LEE
CHECKED BY: J. L. LEE

PROJECT NO: 100-000-0000

441 10TH STREET
SAN DIEGO, CA 92101

ETABEILLE

RENDERING

DATE: 01/15/2020

PROJECT NO: 100-000-0000

DATE: 01/15/2020

A5

Page 3 of 24



A rendering of the base case project is shown here. The corner house is not part of the subject property.



Exhibit 3

Xpera Group has prepared a financial feasibility analysis to determine the economic feasibility of the various development options/development alternatives of the project, assuming a reasonable economic return for the property owner.

In this analysis, we have analyzed the viability of the apartment project, considering the preferred plans (base case) and four development alternatives, as follows:

Base Development Proposal

This option incorporates the existing Historic Building, which will be moved forward to the front property line, completely into the new development. Level 2 decks and planters will be removed and the wall plane will setback approximately 3 feet from the outermost face of the Historic Building. All other levels will retain 4 foot deck/planter projections over the Public Right of Way and the exterior building wall will be flush with Front Property Line.

The Historic Building will be placed on the South-East corner of the property. A new exit door will be incorporated into the South-East bay of the street façade of the Historic Building. The windows along the North Elevation of the Historic



Building will be incorporated into the access doors for the Water Meter and Trash Room.

The building structure will stack from Roof Level down to Grade with this Base Proposal creating an efficient, cost effective structure.

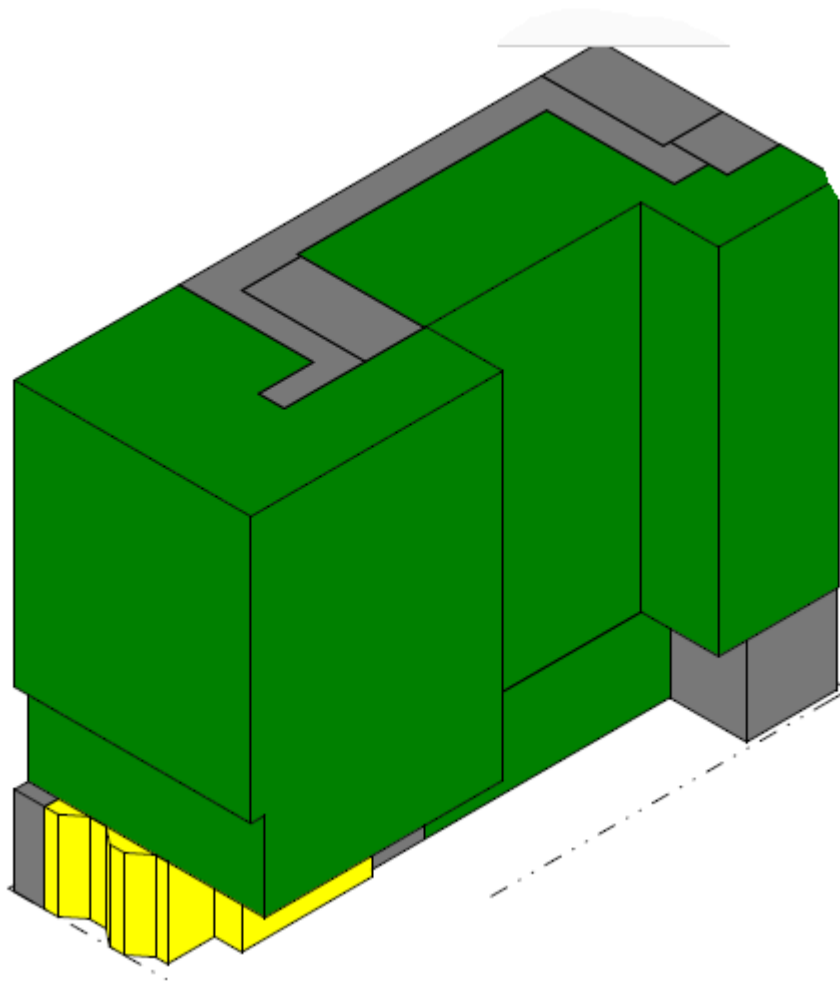


Exhibit 4



Alternative 1

Historic Building will remain in its exact current location. The new development is limited to the area directly to the rear of the Historic Building. The new development will have minimal habitable areas given the need for Life Safety Circulation. The size of the habitable areas will have an economic effect on this project.

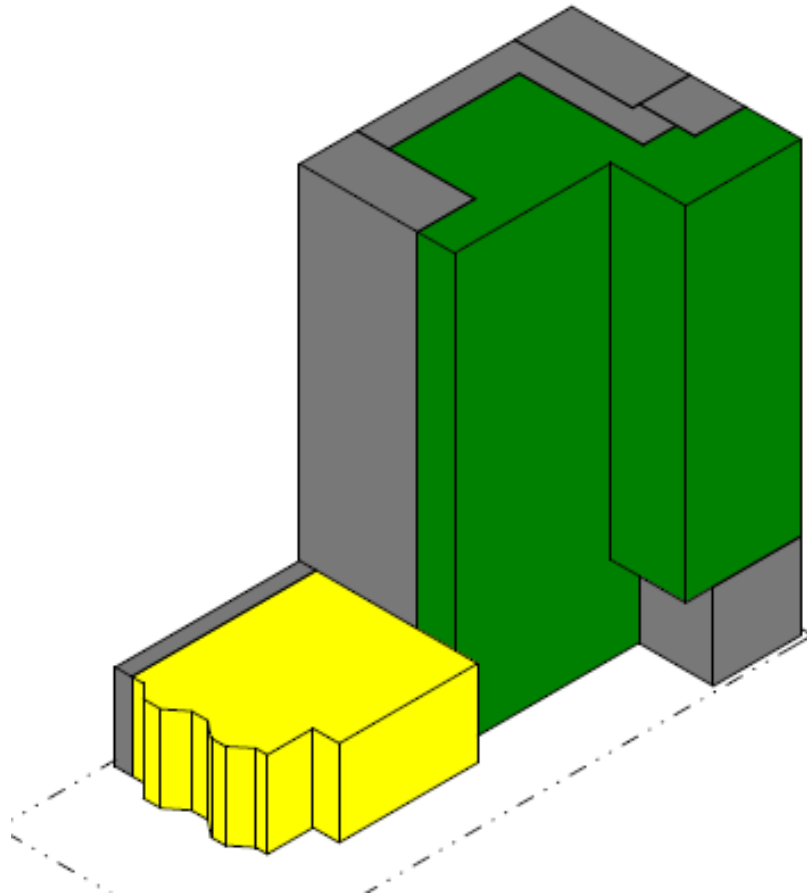


Exhibit 5



Alternative 2

Historic Building will be moved forward to the front property line. The new development will be limited to the area directly to the rear of the Historic Structure. New development has minimal habitable areas given the need for Life Safety Building. The size of the habitable areas will have an economic effect on this project.

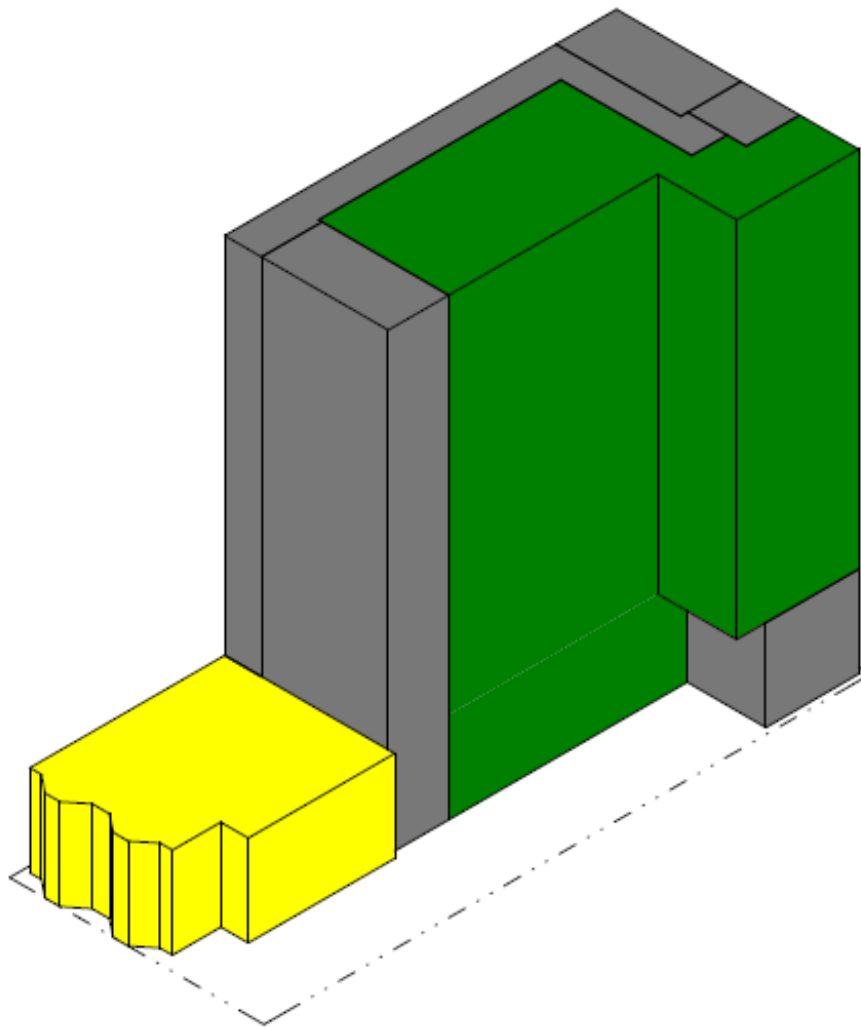


Exhibit 6



Alternative 3

Historic Building will be moved forward to the front property line. The new development will be stepped back at the 2nd level 10 feet and levels 3 through 7 will cantilever over the Historic Building.

The biggest challenge with this alternative will be the structural feasibility given the large cantilever. The irregularity of the structure may not meet lateral design requirements per the California Building Code. In addition, the cantilever will require giant concrete beams to be incorporated into the design, which will encroach into the corridors due to the large depths. This could cause the loss of rental units.

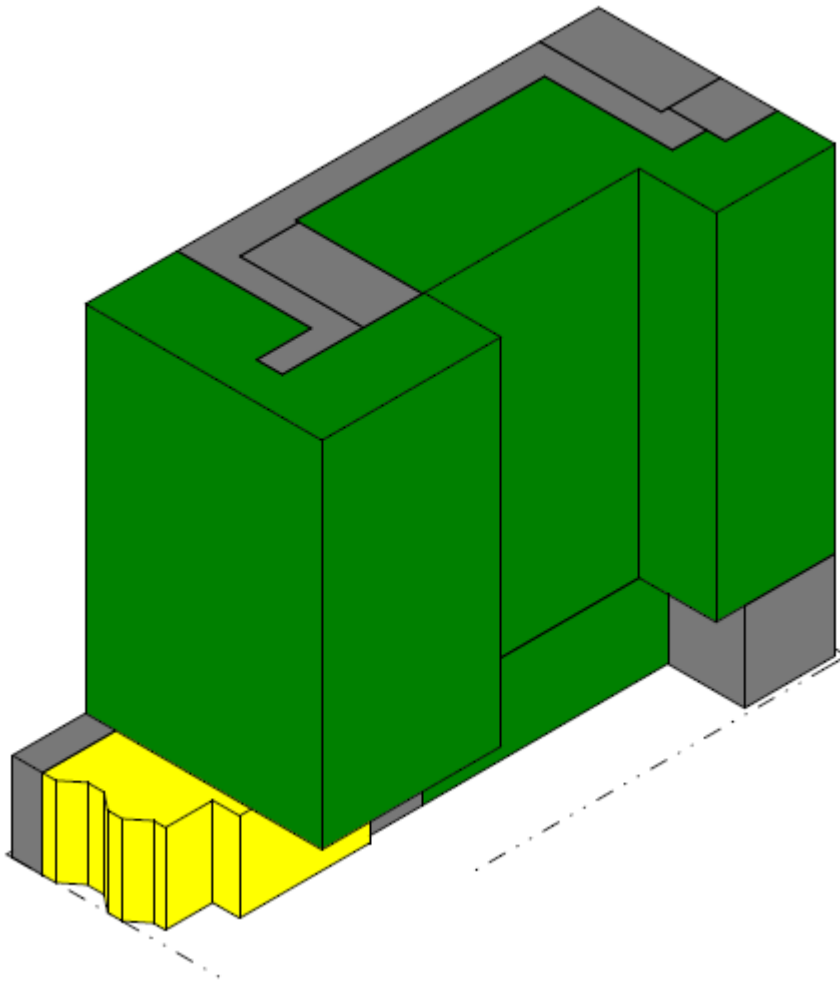


Exhibit 7



Alternative 4

“This is the alternative that was our former Base Development Proposal where we were planning on relocating the Historic Building from this site for rehabilitation and reuse on another site and building new development on this site. The only reason we are not proceeding with this option is the fact that we want to respond to preservationists’ concerns about removing the Historic Building from this site. Although the relocation alternative will have added expense, it may be the second best option for the Historic Building.”

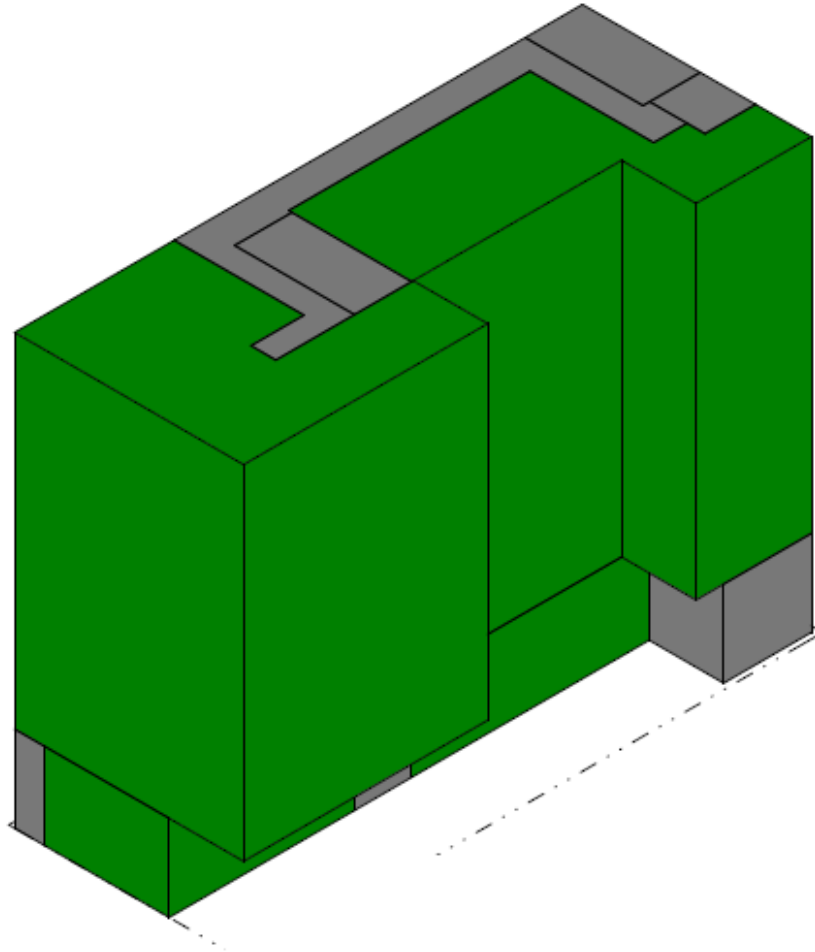


Exhibit 8



The ramifications of the base case and four alternatives are shown in the following exhibit: (Exhibit 9A&B)

Alternative Plans to Determine Economic Consequences 454 13th Street (Ezabelle) Downtown San Diego		
Base Case & Alternates 1 & 2		
Property	Historic Structure	Apartment Project
Base Project: Move historic structure to front property line; build apartments incorporating historic structure		
Construction	Move historic structure to front property line	Build 48 units on site
Construction Implications	Renovation	Cost of units
Parking Implications	No Parking on Site	No Parking on Site
Cost Estimates	Estimate with HVAC, remodeling, seismic & Title 24; exterior to be cosmetically improved	Est. costs prepared for this study
Income potential	Rent out renovated structure	Optimal income with affordable units
Financial implications	Net operating income and return on investment to be calculated	Net operating income and return on investment to be calculated
Alternative 1: Retain existing structure in current location and build new project behind it.		
Construction	Leave historic structure in place and rehab	Build 18 units
Construction Implications	Bring up to seismic stds. and Title 24	Cost per rentable sq.ft. increases dramatically
Parking Implications	No Parking on Site	No Parking on Site
Cost Estimates	Estimate with HVAC, remodeling, seismic & Title 24; exterior to be cosmetically improved	Est. costs prepared for this study
Income potential	Rent out renovated structure	Income would decline dramatically
Financial implications	Net operating income and return on investment to be calculated	Cost would be above value.
Alternative 2: Move historic structure to front property line and build new project behind it.		
Construction	Move historic structure to front property line	Build 24 units
Construction Implications	Bring up to seismic stds. and Title 24	Cost per rentable sq.ft. increases dramatically
Parking Implications	No Parking on Site	No Parking on Site
Cost Estimates	Estimate with HVAC, remodeling, seismic & Title 24; exterior to be cosmetically improved	Est. costs prepared for this study
Income potential	Rent out renovated structure	Income would decline dramatically
Financial implications	Net operating income and return on investment to be calculated	Cost would be above value.

4.2018



Exhibit 9A



**Alternative Plans to Determine Economic Consequences
454 13th Street (Ezabelle)
Downtown San Diego**

Alternates 3 & 4

Property	Historic Structure	Apartment Project
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Alternative 3: Move historic structure to front property line; cantilever project over historic structure and build new project over and behind it.

Construction	Move historic structure to front property line	Build 24 apts.
Construction Implications	Estimate with HVAC, remodeling, seismic & Title 24; exterior to be cosmetically improved	Cost per rentable sq.ft. increases dramatically
Parking Implications	No Parking on Site	No Parking on Site
Cost Estimates	Estimate with HVAC, remodeling, seismic & Title 24; exterior to be cosmetically improved	Est. costs prepared for this study
Income potential	Rent out renovated structure	Income would decline dramatically
Financial implications	Net operating income and return on investment to be calculated	Cost would be above value.

Alternative 4: Relocate historic structure to another site and built out entire site with apartments

Construction	Building renovation including new slab and utility hook-ups	Build 48 units on entire site
Construction Implications	Cost of moving structure to another location; renovate building to current code and to Title 24 standards	Cost of units
Parking Implications	No Parking on Site	No Parking on Site
Cost Estimates	Acquire land; relocate building; build new slab; renovate building	Est. costs prepared for this study
Income potential	Rent out renovated structure	Optimal income with affordable units
Financial implications	Net operating income and return on investment to be calculated	Possibility of achieving positive net operating income

4.2018



Exhibit 9B



The base case and alternative unit count, unit square footages and projected rents are shown here (Exhibit 10):

Project Facts No. Units, Square Footage and Projected Revenue 454 13th Street (Ezabelle) Downtown San Diego					
	Base Case	Alt 1	Alt 2	Alt 3	Alt 4
Land					
Square footage	4,200				
Cost of Land	\$ 850,000				
Parcel numbers	535-156-08-00				
Unit Mix					
Studios	48	18	24	24	48
Commercial	2	2	2	2	2
Total Units	50	20	26	26	50
Residential Unit Square Footage (Avg.)					
Studios	299	263	284	290	301
Total Square Footage					
Studios	14,352	4,734	6,816	6,960	14,448
Commercial (including historic structure)	1,796	1,559	1,787	1,796	1,830
Total Square Footage	16,148	6,293	8,603	8,756	16,278
Rent Per Residential Unit					
Studios	\$ 1,350	\$ 1,247	\$ 1,279	\$ 1,340	\$ 1,350
Total Projected Monthly Revenue					
Studios	\$ 64,800	\$ 22,446	\$ 30,696	\$ 32,160	\$ 64,800
Commercial	\$ 3,592	\$ 3,118	\$ 3,574	\$ 3,592	\$ 3,660
Total Projected Monthly Revenue	\$ 68,392	\$ 25,564	\$ 34,270	\$ 35,752	\$ 68,460
Total Projected Annual Revenue					
Studios	\$ 777,600	\$ 269,352	\$ 368,352	\$ 385,920	\$ 777,600
Commercial	\$ 43,104	\$ 37,416	\$ 42,888	\$ 43,104	\$ 43,920
Total Projected Annual Revenue	\$ 820,704	\$ 306,768	\$ 411,240	\$ 429,024	\$ 821,520
Differential from Base Case					
% Differential		-37.4%	-50.1%	-52.3%	100.1%
5					
Parking Spaces					
	0	0	0	0	0
Historic Structure (Sq.Ft.):					
	895				

4.2018



Exhibit 10



The base case and alternative plans were developed by NDDInc., including architectural plans and projected costs of development. The report was completed by members of the Xpera Group professional staff, including senior cost estimator James Weber and financial analyst Neal Singer. Mr. Weber reviewed the costs prepared by NDDInc.

John Hansen House Moving provided the cost of moving the historic house. The cost of preparing the new site for the historic home was prepared by NDDinc. The cost of the land for the new site was based on comparable sales in the area.

Preparing the site for the relocated building includes a new slab, utilities hook-ups, grading and (possibly) fencing.



Conclusions of Economic Alternatives

The four key elements to determine the viability of the base case and alternatives are the rents, expenses, net operating income and development costs. The net operating costs lead to a determination of the value based on a capitalization rate.

Rents, Expenses & Net Operating Income

➤ Rents for the Base Case and Three Alternatives

The market rate rent levels of the units were determined by the developer:

Market Rate Rents (2018 Basis) Base Case & 4 Alternatives 454 13th Street (Ezabelle) Downtown San Diego									
Unit Type	Avg.	Base & Alt 4		Alt 1		Alt 2		Alt 3	
		Units	Annual Revenue	Units	Annual Revenue	Units	Annual Revenue	Units	Annual Revenue
Base & Alt. 4	\$ 1,350	48	\$ 777,600						
Alt 1	\$ 1,247			18	\$ 269,352				
Alt 2	\$ 1,279					24	\$ 368,352		
Alt 3	\$ 1,340							24	\$ 385,920
Total/Avg.		48	777,600	18	269,352	24	368,352	24	385,920

4.2018



Exhibit 11

➤ Operating Expenses

We segmented operating expenses into two categories: fixed and variable. The expenses shown below are at the stabilized level.



- **Fixed expenses** are those that will not vary for the base case and alternatives. They include salaries for the management, maintenance and other salaries and burden. They do vary significantly on a per unit basis.
- **Variable expenses** relate to the number of units. Typically, that category would include insurance, costs of turnover, repairs and maintenance and common area utilities.
- **Property taxes** are calculated at 1.1% of the total costs of the project including land. The actual tax amount will be determined by the County Assessor upon completion of the project. The taxes will change based on the number of units.

Projected Annual Operating Expenses 1st Year of Complete Operation 454 13th Street (Ezabelle) Downtown San Diego						
	%	Base Case & Alt. 4	Alt. 1	Alt. 2	Alt. 3	Alt. 4
Residential Units		48	18	24	24	48
Commercial Units		2	2	2	2	2
Total		50	20	26	26	50
Unit Count Differentia from Best Case Scenario		100.0%	37.5%	50.0%	50.0%	100.0%
Fixed						
Salaries	25.00%	71,811	\$26,842	\$38,669	\$40,354	\$71,883
Landscape	2.50%	7,181	\$2,684	\$3,867	\$4,035	\$7,188
Safety/Security	2.50%	7,181	\$2,684	\$3,867	\$4,035	\$7,188
Advertising/Promotion	3.00%	8,617	\$3,221	\$4,640	\$4,842	\$8,626
Property Taxes	32.50%	93,355	\$34,895	\$50,270	\$52,460	\$93,448
Total Fixed	65.50%	\$ 188,145	\$ 70,327	\$101,314	\$105,726	\$188,333
Per Unit (Res'l & Com'l)		\$ 3,763	\$ 3,516	\$ 3,897	\$ 4,066	\$ 3,767
Variable						
Management Fees	10.00%	\$28,725	\$10,737	\$15,468	\$16,141	\$28,753
Repair & Maintenance	10.00%	\$28,725	\$10,737	\$15,468	\$16,141	\$28,753
Utilities	4.50%	\$12,926	\$4,832	\$6,960	\$7,264	\$12,939
Insurance	10.00%	\$28,725	\$10,737	\$15,468	\$16,141	\$28,753
Total Variable	34.50%	\$99,100	\$37,042	\$53,364	\$55,688	\$99,199
Per Unit - Res'l & Com'l		\$ 1,982	\$ 1,852	\$ 2,052	\$ 2,142	\$ 1,984
Total Project	100.00%	\$ 287,245	\$107,369	\$154,678	\$161,414	\$287,532
Total Per Unit - Res'l & Com'l		\$ 5,745	\$ 5,368	\$ 5,949	\$ 6,208	\$ 5,751
Expenses as % of Gross Revenue		35%	35%	38%	38%	35%

Source: NDDInc.
4.2018





➤ Net Operating Income

The net operating income is computed by subtracting operating expenses from revenue. It is the net operating income that is utilized to calculate the project value, using the capitalization method.

The rents and expenses are calculated for the first full year of operations and which point the building will be completed, rented up and have a stabilized income.

Stabilized Net Operating Income (Projected) Base and Alternative Options 454 13th Street (Ezabelle) Downtown San Diego					
Alternatives:	Base Case	Alt. 1	Alt. 2	Alt. 3	Alt. 4
Residential Units to be Built:	48	18	24	24	48
Commercial Units	2	2	2	2	2
Total Units	50	20	26	26	50
Gross Revenues (Projected)	\$ 820,704	\$ 306,768	\$ 411,240	\$ 429,024	\$ 821,520
Vacancy & Collection %	5.0%	5.0%	5.0%	5.0%	5.0%
\$ Vacancy & Collection	\$ 41,035	\$ 15,338	\$ 20,562	\$ 21,451	\$ 41,076
Net Revenues	\$ 779,669	\$ 291,430	\$ 390,678	\$ 407,573	\$ 780,444
Operating Expenses	\$ 287,245	\$ 107,369	\$ 154,678	\$ 161,414	\$ 287,245
Net Operating Income	\$ 492,424	\$ 184,061	\$ 236,000	\$ 246,158	\$ 493,199

4.2018



Exhibit 13

➤ Capitalized Value

A capitalization rate is the rate that the investor marketplace will most often use to determine the value of an investor-grade project. It is the value that relates to the market's determination of the quality of the project, its location and operational history. It is what an investor would expect by way of return on an all-cash basis.

In San Diego today, capitalization rates on investor-grade apartment projects typically range from 4.0% to 6.0% depending on the factors noted above.

We capitalized the project net income from operations at 5.0% because of its highly centralized location in downtown San Diego and quality of architecture.



The capitalized value is greatest with the base case and Alternative 4, with lesser amounts for alternative 1, 2 and 3 because they have fewer units and a higher expense per unit. (Exhibit 14)

Capitalized Value (Year 1: Stabilized Income) 454 13th Street (Ezabelle) Downtown San Diego					
Alternatives:	Base Case	Alt. 1	Alt. 2	Alt. 3	Alt. 4
Residential Units to be Built:	48	18	24	24	48
Net Operating Income	\$ 492,424	\$ 184,061	\$ 236,000	\$ 246,158	\$ 493,199
Capitalization Rate	5.0%	5.0%	5.0%	5.0%	5.0%
Capitalized Value of Property	\$9,848,476	\$3,681,216	\$4,720,008	\$4,923,168	\$9,863,980

4.2018




Exhibit 14



Development Costs

The development costs prepared for this study have four components:

- Cost of Land
- Hard and soft costs of construction;
- Building permits and fees;
- Loan interest; and
- The costs associated with relocation and rehabilitation of the historic building (Alternative 4).

The land cost for the subject property is \$850,000.

Estimated Development Costs 7-Story Concrete Structure 454 13th Street Downtown San Diego					
Alternative	Base	1	2	3	4
Total Sq.Ft.	16,148	6,293	8,603	8,756	16,278
Soft Costs	\$1,808,374	\$842,808	\$954,906	\$1,028,371	\$1,808,374
Hard Costs	\$5,839,560	\$3,152,760	\$3,777,360	\$3,820,560	\$5,839,560
Total	\$ 7,647,934	\$ 3,995,568	\$ 4,732,266	\$ 4,848,931	\$ 7,647,934
Land Costs	\$ 850,000	\$ 850,000	\$ 850,000	\$ 850,000	\$ 850,000
Total Development Costs	\$ 8,497,934	\$ 4,845,568	\$ 5,582,266	\$ 5,698,931	\$ 8,497,934
Cost Per Sq.Ft.	\$ 526	\$ 770	\$ 649	\$ 651	\$ 522



Exhibit 15



Alternative 4 includes the relocation of the historic structure at 454 13th Street to a location in Mission Hills. The cost of the relocation is estimated at \$760,000, as shown on Exhibit 16.

Cost of Construction/Moving To Lot in Mission Hills Historic Structure 454 13th Street (Ezabelle) Downtown San Diego	
Sq.Ft.	
Category	Base Case
Site Work Preparation	\$ 35,000
Relocation	\$ 125,000
Historic Rehab	\$ 250,000
Lot Cost	\$ 350,000
Total Structure	\$ 760,000

4.2018

Exhibit 16

There are relatively few lots available for acquisition in the greater Mission Hills area where the developer has designated a lot that could accommodate the historic house. The four lots shown in the exhibit below range in price from \$295,000 to \$520,000. We have used a conservative value of \$350,000.

The comparable lots are shown in Exhibit 17:



Comparable Properties
Residential Land/Lot Valuation
Mission Hills and Vicinity
City of San Diego
as of April 2018

APN	Address	ZIP	Lot Size (Sq.Ft.)	Date of Sale	List/Selling Price	\$/Sq.Ft.	Topography	Suitability
443-200-08-00	4285 Randolph St.	92103	15,586	2/2018	\$ 480,000	\$ 30.80	Level	Appropriate
				Sale Pending				
444-272-09-00	Goldfinch St.	92103	6,134	5/2017	\$ 295,000	\$ 48.09	Sloping	Appropriate
436-422-03-00	Lauretta St.	92110	4,994	11/2017	\$ 475,000	\$ 95.11	Sloping	Appropriate
430-382-15-00	Milton Street	92110	4,518	5/2017	\$ 520,000	\$ 115.10	Level	Appropriate

Source: Courthouse Retrieval System
4.2018

Exhibit 17

On Exhibit 18 the total costs of development are shown for the base case and the four alternatives.

Estimated Total Costs of Development
Base Case and Alternatives
454 13th Street (Ezabelle)
Downtown San Diego

Category	Units (2)	Land	Building Construction (1)	Soft Costs and Building Permits	Historic Structure Relocation	Interest on Loan	Total	Cost Per Unit
Base Case	50	\$850,000	\$ 5,839,560	\$ 1,808,374		\$ 356,913	\$ 8,854,847	\$177,097
Alt. 1	20	\$850,000	\$ 3,152,760	\$ 842,808		\$ 203,514	\$ 5,049,082	\$252,454
Alt. 2	26	\$850,000	\$ 3,777,360	\$ 954,906		\$ 234,455	\$ 5,816,721	\$223,720
Alt. 3	26	\$850,000	\$ 3,820,560	\$ 1,028,371		\$ 239,355	\$ 5,938,286	\$228,396
Alt. 4	50	\$850,000	\$ 5,839,560	\$ 1,808,374	\$ 760,000	\$ 356,913	\$ 9,614,847	\$192,297

(1) excludes cost of relocating historic structure
(2) includes residential & commercial



4.2018

Exhibit 18



Final Determination of Economic Value for the Base Case and Alternatives

In the exhibit below, we calculate the differential between the capitalized value of the project and the development costs of the base case and the four alternatives (Exhibit 19):

Summary: Differentials in Value and Net Operating Income Base Case and 4 Alternatives 454 13th Street (Ezabelle)					
Alternative	Base	Alt. 1	Alt. 2	Alt. 3	4
Summary:	Move historic structure to front of property line & build new apartments over it.	Historic structure in its exact current location. The new development is limited to the area directly to the rear of the historic structure.	Move historic structure to front property line. in its exact current location. The new development is limited to the area directly to the rear of the Historic Structure.	Move historic structure to front property line. Cantilever new structure over historic structure.	Move historic structure to new site and build new apts.
No. Residential Units	48	18	24	24	48
% of Base Recommendations		37.5%	50.0%	50.0%	100.0%
Capitalized Value Calculation					
1st full year of operation	\$492,424	\$184,061	\$236,000	\$246,158	\$493,199
Capitalization Rate	5.0%	5.0%	5.0%	5.0%	5.0%
Capitalized Value	\$ 9,848,476	\$ 3,681,216	\$ 4,720,008	\$ 4,923,168	\$ 9,863,980
Decrease in Project Value		\$ 6,167,260	\$ 5,128,468	\$ 4,925,308	\$ (15,504)
% Change in Property Value		-62.6%	-52.1%	-50.0%	0.2%
Loss in Net Operating Income					
Net Operating Income	\$ 492,424	\$ 184,061	\$ 236,000	\$ 246,158	\$ 493,199
Differential		\$ 308,363	\$ 256,423	\$ 246,265	\$ (775)
% Differential		-62.6%	-52.1%	-50.0%	0.2%
Capitalized Value	\$ 9,848,476	\$ 3,681,216	\$ 4,720,008	\$ 4,923,168	\$ 9,863,980
Development Cost	\$ 8,854,847	\$ 5,049,082	\$ 5,816,721	\$ 5,938,286	\$ 9,614,847
Differential	\$ 993,629	\$ (1,367,866)	\$ (1,096,713)	\$ (1,015,118)	\$ 249,133
Capitalized Value Per Unit	\$ 205,177	\$ 204,512	\$ 196,667	\$ 205,132	\$ 205,500
Development Cost Per Unit	\$ 184,476	\$ 280,505	\$ 242,363	\$ 247,429	\$ 200,309
Economic Preference Rating	1	5	4	3	2

4.2018





Alternative 1 results in a reduction of project value of 62.6% with a similar net operating loss. The development cost would be \$68,393 per unit more than the capitalized value. The significant incremental costs make this an economically infeasible option.

Alternative 2 moves the historic structure to the front property line and builds the new structure to the rear of the structure. In the process, the number of residential units is reduced to 24, a decline of 50%. Furthermore, the development cost per unit is \$42,181 per unit more than the capitalized value. The significant incremental costs make this an economically infeasible option.

Alternative 3 moves the existing historic structure to the front property line with the new structure cantilevered over it. This alternative also results in a 50% loss of units and a development cost per unit \$39,043 per unit more than the project's capitalized value. The significant incremental costs make this an economically infeasible option.

Alternative 4 relocates the historic structure to a new location and builds the base case structure. This alternative is economically feasible; it is however economically inferior to the Base project.

Thus, we rank Base Case and Alternative 4 as the only economically feasible alternatives. Alternatives 1, 2 and 3 are all economically infeasible.

Therefore, it is our professional opinion that the optimal and most economically feasible project is the Base Case, with Alternative 4 a close second.

We stand ready to respond to your questions and comments.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Alan N. Nevin', is written over a faint, circular, light blue watermark that contains the word 'XPERA'.

Alan N. Nevin
Director of Market Research
Xpera Group



ADDENDUM: Economic Feasibility Study for Parking

The goal of the following is to provide analysis of the economic impact due to the addition of parking for the proposed base development.

Current parking requirements indicate the need to accommodate 12 parking spaces. To comply with this requirement the project will need to include 2 subterranean basement levels. The costs to consider are excavation, grading, shoring, build out of 2 subterranean levels and an elevator lift plus the extension of both exit stair elements to access both parking levels.

Below are the respective costs of each and economic impact of the parking requirement (Exhibit 20):

Economic Infeasibility of Parking Ezabelle Project			
2 Subterranean levels below grade	Area	Cost Per sq.ft.	
2 Basement Levels	8400	100	\$840,000
Grading & Excavation			\$400,000
Shoring			\$750,000
Elevator Lift			\$250,000
Total Parking Costs			\$2,240,000

Current Project Costs	Total Project Cost Including Parking	Capitalized Value of Project	Value Created
\$8,497,934	\$10,737,934	\$9,848,448	-\$889,486

Exhibit 20

The economic consequences of providing parking on this small (4,200 sq. ft.) lot would be detrimental to this project in a significant way. The proposed cost of parking would take the total cost of the project to \$10,737,934, with a capitalized value of only \$9,848,448. It is our opinion that this requirement would deem the project economically infeasible as demonstrated by a significant negative value created.

Alan N. Nevin
Director of Market Research
Xpera Group

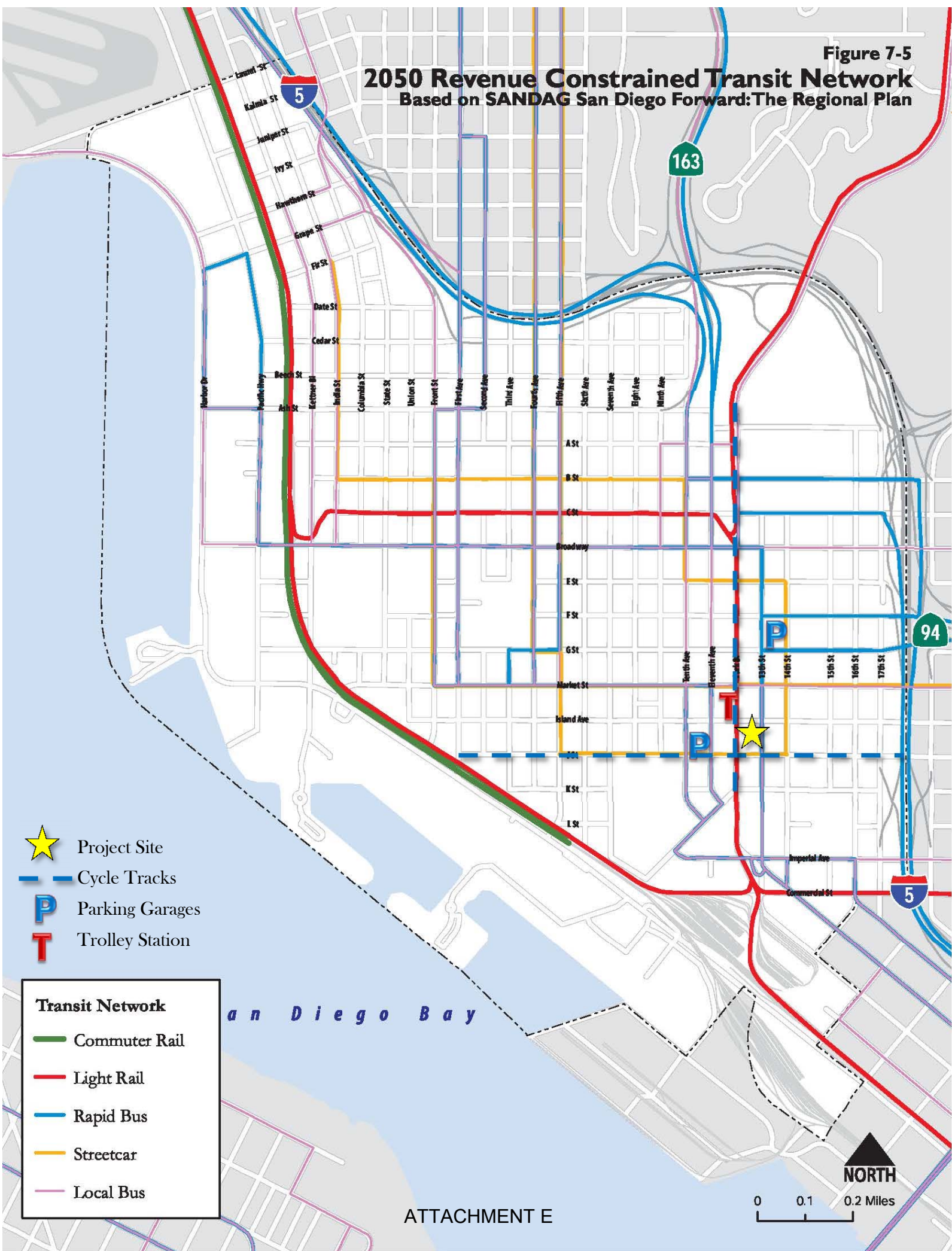


Disclaimer

Although the results, conclusions and recommendations contained within this consultant's report are based upon a thorough review and analysis of current competitive market conditions and the expertise of the author, Consultant does not in any way represent, warrant or guarantee that any reported results will be achieved as a result of various reasons, including but not limited to the sensitivity to ever-fluctuating market conditions and the efficiency of a Client and its representatives, agent, employees, successors and assigns.






Figure 7-5

2050 Revenue Constrained Transit Network Based on SANDAG San Diego Forward: The Regional Plan



-  Project Site
-  Cycle Tracks
-  Parking Garages
-  Trolley Station

Transit Network

-  Commuter Rail
-  Light Rail
-  Rapid Bus
-  Streetcar
-  Local Bus

SAN DIEGO DOWNTOWN DESIGN GUIDELINES

4.5.10

Blank Walls

Guidelines

- **4.5.10.A** Blank walls on the ground level or on façades of buildings are to be limited to provide a pleasant and rich pedestrian experience. Blank walls include any street wall area that is not transparent, including solid doors and mechanical areas.
- **4.5.10.B** Unavoidable blank walls along public streets or those viewed from public streets, open spaces and thoroughfares should be treated to create an inviting visual experience. All blank wall area should be enhanced with architectural detailing, material texture, ornamentation, landscape treatment and/or artwork.



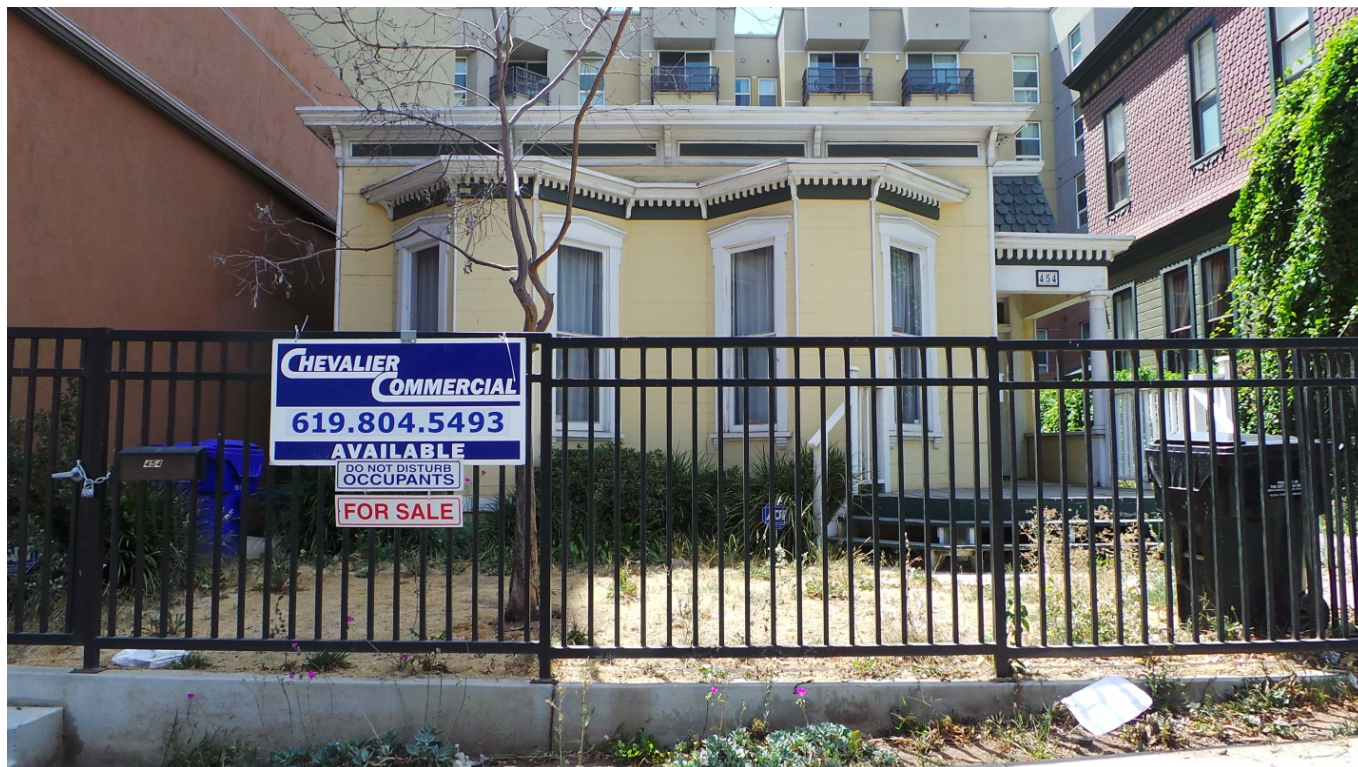
Unavoidable blank walls viewed from public streets should be enhanced with architectural detailing, material texture, and other devices. Above, San Diego, CA.



Blank walls at street-level should be treated through use of rich and textured materials, color, and landscape materials. Top, Portland, OR; bottom, San Diego, CA.



454 13th Street Residential Project



Prepared by:

Marie Burke Lia, Attorney at Law, on behalf of the Project Applicants

June 30, 2018

FINDINGS

San Diego Municipal Code

Article 6: Development Permits

Division 5: Site Development Permits

Introduction:

The proposed development includes the redevelopment of a 4,218 square foot parcel on the west side of 13th Street, between Island and J Streets in the East Village area of the Centre City Planned District. The original structure on this parcel was the John and Mary Wright House, constructed in 1881, which consisted of 864 square feet and was described as a 5-room cottage. In 1942, a 486-square foot addition was added to the rear this cottage. On November 16, 2017, the original 864 square foot cottage was designated a San Diego Historical Landmark #1278. The 1942 addition was excluded from that designation. The proposed redevelopment of this site will incorporate the historical resource into the new development on the site.

The existing 4,218 square foot parcel will be redeveloped in accordance with the requirements of the Centre City Planned District Ordinance and all other applicable sections of the San Diego Municipal Code. The proposed development will contain a seven story, 77 foot tall mixed-use development comprised of 45 dwelling units, including 13% very low income units, and approximately 1,722 square feet of ground floor commercial on the existing site, with no off-street parking spaces. The proposed development is consistent with the Centre City Planned District, which is subject to the Downtown Community Plan.

§126.0504 Findings for Site Development Permit Approval

(a) Findings for all Site Development Permits

(1) The proposed development will not adversely affect the applicable land use plan

Land Use and housing issues are addressed in Chapter 3 of the Downtown Community Plan. As shown in the Plan's Land Use Map, Figure 3-4, attached as *Exhibit 1*, the development on this block is designated for Residential Emphasis. Residential Emphasis areas will accommodate primarily residential development. Small-scale businesses, offices, services and ground floor commercial uses are also allowed provided they do not exceed 20% of the overall building area.¹

¹ Chapter 3, page 3-12.

Figure 3-9 of the Downtown Community Plan, attached as *Exhibit 2*, shows the allowable minimum and maximum FARs (Floor Area Ratios) for various sites. The incorporation of the historic resource into the proposed new development will allow the development of the subject 13th Street property in accordance with the minimum 3.5 FAR and the maximum 6.0 FAR for the site as established by this Plan. The proposed project will result in a 5.9 FAR, within the minimum and the maximum allowed. The proposed project will, therefore, comply with Chapter 3 of the Downtown Community Plan and will be consistent with the Residential Emphasis area.

Historic Conservation is addressed in Chapter 9 of the Downtown Community Plan. The existing 1881 cottage on the project site is a locally designated historical resource, HRB #1278. As indicated in Table 9-1 of the Plan, attached as *Exhibit 3*, San Diego Register listed properties should, whenever possible, be retained on site. "Partial retention, relocation or demolition of a resource shall only be permitted through applicable City procedures."²

The applicable City procedures are established in San Diego Municipal Code Chapter 14, Article 3, Division 2, entitled "Historical Resources Regulations." Municipal Code §143.0210 (2) (C) requires a Site Development Permit in accordance with Process Four for any development that proposes to deviate from the development regulations for historical resources described in this division. Substantial alteration of a designated resource by relocation or other means is a deviation from the historical resources regulations and, therefore, a Site Development Permit, as authorized by Chapter 12, Article 6, Division 5, entitled "Site Development Permit Procedures," is required. The Planning Commission as decision maker must make all of the Findings in §126.0505(a) and §126.0505(i) before the substantial alteration or incorporation of a locally designated resource can occur.

Municipal Code §126.0505(a) contains the three basic Findings required for all Site Development Permits, which are: (1) The proposed development will not adversely affect the applicable land use plan; (2) the proposed development will not be detrimental to the public health, safety and welfare; and (3) the proposed development will comply with the regulations of the Land Development Code. As discussed above, the proposed development will comply with the provisions of Municipal Code §126.0505(a).

Municipal Code §126.0505(i) contains the three supplemental Findings required for all Site Development Permits for Substantial Alteration, which are: (1) There are no feasible measures, including a less environmentally damaging alternative, that can further minimize the potential adverse effects on the historical resource; (2) the deviation is the minimum necessary to afford relief and accommodate the development and all feasible measures to mitigate for the loss of

² Chapter 9, page 9-3.

any portion of the historical resource have been provided by the applicant, and (3) the denial of the proposed development would result in economic hardship to the owner. For purposes of this finding, “economic hardship” means there is no reasonable beneficial use of the property and it is not feasible to derive a reasonable economic return from the property.

The Mitigation Monitoring and Reporting Program (MMRP) for the Downtown Community Plan requires the implementation of Mitigation Measure HIST – A. 1-2-1 if a locally designated historical resource would be partially retained on site, relocated or demolished. That Mitigation Measure requires the submission of a Documentation Program with Photo Documentation and Measured Drawings of the resource to the Historical Resources Board Staff for review and approval.

Mitigation Measure HIST – A. 1-2 requires the development and submission of a Treatment Plan to ensure the protection of the resource during its incorporation and subsequent rehabilitation on the site to the Historical Resources Board Staff for review and approval. This Mitigation Measure also requires that a Monitoring Plan, developed and conducted by the Qualified Historical Monitor during the incorporation and the post-incorporation rehabilitation of the resource on the site, be submitted to the Historical Resources Board Staff for review and approval. And, lastly, the final Draft Monitoring Report must be submitted for review and approval by the Historical Resources Board Staff at the completion of the project, after which a Certificate of Occupancy may be issued for the incorporated resource. The implementation of these Mitigation Measures will be required as a Condition of this Site Development Permit.

Therefore, the processing of this Site Development Permit is in compliance with and will not adversely affect this aspect of the applicable land use plan.

(2) The proposed development will not be detrimental to the public health, safety, and welfare.

The proposed development will consist of a seven-story residential and commercial rental building on the west side of 13th Street between Island and J Streets. The project will consist of 45 residential rental units, including 13% very low income affordable units, 1 large ground floor commercial space, and no off-street parking spaces. The project site is small, only 4,218 square feet, and the proposed development provides the largest number of units possible at this site.

The proposed development complies with the San Diego Municipal Code and Uniform Building Code provisions intended to ensure the proposed development will not be detrimental to the public health, safety, and welfare.

(3) The proposed development will comply with the applicable regulations of the Land Development Code.

The proposed project will consist of a transit and pedestrian oriented, high density, mid-rise, mixed income residential rental apartment and commercial development within a Residential Emphasis Area as called for in the Downtown Community Plan.

The proposed development will comply with the applicable provisions of the Centre City Planned District Ordinance in the following manner. It is located within the Residential Emphasis Area of the Plan that specifically calls for this type of property use. The development will comply with the Plan's FAR regulations in that its FAR of 5.9 is within the minimum FAR of 3.5 and the maximum FAR of 6.0.

The development complies with the Centre City Planned District Ordinance's Development Regulations pertaining to lot size, minimum building set-backs, building heights and residential development regulations with some minor deviations such as the FAR. It will comply with the PDO's Urban Design Regulations pertaining to building orientation, façade articulation, street level design, pedestrian entrances, transparency, blank walls, exterior projecting balconies, rooftops, encroachments into public rights-of-way, regulations pertaining to historical resources requiring a Site Development Permit, additional standards for main streets, and off-street parking.

The relevant Land Development Code's Planning and Development Regulations for topics not addressed in the Centre City Planned District Ordinance are contained in that Code's Chapter 14 and include: Grading Regulations, Drainage Regulations, Landscape Regulations, Parking Regulations, Refuse and Recyclable Materials Storage, Mechanical and Utility Equipment Storage Regulations, Building Regulations, Electrical Regulations, and Plumbing Regulations. The project will comply with these regulations, as will be required by the building permit to be issued for this project. Therefore, the proposed development will comply with all applicable regulations of the Land Development Code.

§126.0505 (i) Supplemental Findings – Historical Resources Deviation for Substantial Alteration of a Historical Resource

1. There are no feasible measures, including retaining the resource on the site, that can further minimize the potential adverse effects on the historical resource;

The existing one-story house on this site was originally constructed of wood as an 864-square foot single family residence in 1881 and was enlarged with a 486-square foot addition in 1942. The addition was excluded from the local historical designation action of November 16, 2017. It is understood that this 864-square foot house will require some repair and rehabilitation, which is typical of buildings of similar vintage. In addition, the building is expected to require electrical and plumbing upgrades. The building occupies the 4,218 square foot lot at the on the west side of 13th Street between Island and J Streets in the East Village area of Centre City.

Base Development Proposal - It has been determined that it would be feasible to retain the resource on the site, although this course of action would incorporate this small one story building into the proposed new seven story building that will be constructed on this site. While this course of action is a less environmentally damaging alternative than other options, it would still require a Site Development Permit for the Substantial Alteration of the resource because it will result in an actual “substantial alteration” of the resource, which will be used for a commercial space on the ground floor of the new development. This option moves the historic resource forward to the front property line and incorporates the resource completely into the new development. The second floor and above wall planes will be setback approximately 10’ 3” from the outermost face of the historic building. The historic resource will be incorporated into the new development as a ground floor commercial space.

This option is the preferred Base Development Proposal and it is the only economically feasible option for retaining the historic resource on this site. A graphic illustration of this Base Development Proposal is attached as *Exhibit 4, Sheet ST-1*.

Alternative I would retain the resource in its exact current location and limit the proposed new development on the site to the open land area at the rear of the lot. This Alternative development would have minimal habitable areas given the need for Life Safety Circulation. The limited size of the habitable areas would have an economic effect on the project, as will be discussed below. A graphic illustration of Alternative I is also attached as *Exhibit 4, Sheet ST-1*.

Alternative II would move the resource forward to the front property line. The new development would be limited to the open land area at the rear of the lot. The limited size of the habitable areas would have an economic effect on the project, as will be discussed below. A graphic illustration of Alternative II is attached as *Exhibit 5, Sheet ST-2*.

Alternative III would move the resource forward to the front property line. The new development would be stepped back at the 2nd level 10 feet and levels 3 through 7 would cantilever over the historic resource. The biggest issue with this Alternative is the infeasibility of the building structure given the large cantilever. Stepping back the second level 10 feet will create an irregular structure. The irregularity of the structure may not meet lateral design requirements of the California Building Code. In addition, the cantilever will require giant cantilevered concrete beams to be incorporated into the design which will encroach into the corridors due to the large depths. This would cause the loss of 20 units. A graphic illustration of Alternative III is also attached as *Exhibit 5, Sheet ST-3*.

The limited size of the habitable areas would have an economic effect on the project, as will be discussed below.

Alternative IV would relocate the historic resource from this site to the site of a new single family residence in the Mission Hills neighborhood of the City to serve as a guest house for that new residence, which is located on a wooded hillside overlooking the Presidio Park area of the city. That Alternative was the Base Development Proposal until local preservationists requested that the current Base Development Proposal be considered. Alternative IV would permit the development of the subject property as initially designed, as a seven story apartment complex. This Alternative is the second best option for this development although there will additional costs associated with the relocation of the resource. A graphic illustration of Alternative IV is also attached as *Exhibit 6, Sheet ST-3*.

2. The deviation is the minimum necessary to afford relief and accommodate the development and all feasible measures to mitigate the loss of any portion of the historical resource have been provided by the applicant, and

The historic resource is an 864 square foot wood frame cottage that was constructed on this site in 1881 and altered thereafter by a 486 square foot addition. The cottage was designated as a local historical resource under Criterion C for embodying the distinctive characteristics of a style, type, period or method of 1880s Italianate construction. The designation excluded the 1942 rear addition. The south, east and north façades of the house are intact although they have been altered somewhat, the west façade was altered by the rear addition that was found not to be a part of the historic resource. The three remaining facades will be incorporated into the new development and they will continue to serve as exterior façades as illustrated by Sheets A4.0, A4.1, A4.4 and A5.0 of the new development plans, attached as *Exhibit 7* to these Findings. The Mitigation, Monitoring and Reporting Program, discussed above, will ensure that the surviving exterior facades, doors, openings and trim will be rehabilitated in accordance with the Secretary of the Interior's Standards for Rehabilitation. The supervision of their rehabilitation by the Historical Resources Board Staff and Civic San Diego Staff will ensure that the MMRP is complied with and that the required documentation of this property is archived with the appropriate City of San Diego departments and the San Diego History Center. The planned incorporation of this resource into a new development on the original site will enable it to survive for another one hundred years close to where it was constructed in 1881.

3. The denial of the proposed development would result in economic hardship to the owner. For purposes of this finding, "economic hardship" means there is no reasonable beneficial use of a property and it is not feasible to derive a reasonable economic return for the property.

As discussed above, land use and housing issues are addressed in Chapter 3 of the Downtown Community Plan. The block containing the subject property is designated for residential emphasis under that Plan and the minimum and maximum floor area ratios (FARs), which

determine the amount of development in the area, are established by that Plan. The minimum FAR for the subject property is 3.5 FAR and maximum FAR is 6.0. The proposed project's FAR of 5.9 is within the minimum FAR of 3.5 and the maximum FAR of 6.0.

Historic Conservation is addressed in Chapter 9 of the Downtown Community Plan, which, with reference to local designated historical resources, requires that "Partial retention, relocation of demolition of a resource shall only be permitted through applicable City procedures." The partial retention and incorporation of the John and Mary Wright House, HRB #1278, can only be permitted through the application of the "Site Development Procedures" in Chapter 12, Article 6, Division 5 of the Municipal Code.

The proposed Site Development Permit for Substantial Alteration of the John and Mary Wright House, by its incorporation into the new seven story residential and commercial development on the subject property, can only be permitted if the "denial of the proposed development would result in economic hardship to the owner. For purposes of this finding, 'economic hardship' means there is no reasonable beneficial use of a property and it is not feasible to derive a reasonable economic return for the property."

In order to make these economic hardship findings, an Independent Economic Feasibility analysis must be conducted that compares the Base Development Proposal, which would incorporate the surviving elements of the 1881 cottage into the new residential and commercial rental building proposed for the site, with various project Alternatives that would incorporate and retain the cottage on the site in different configurations and one project Alternative that would relocate the cottage to another location for rehabilitation.

As discussed above, the Base Development Proposal would move the cottage to the front of the lot and incorporate it into the new development at the ground floor.

The Economic Feasibility Analysis of this project and the Alternatives has been conducted by Alan Nevin of the Xpera Group for the property owner. Mr. Nevin has had extensive experience in conducting such analyses in and for the City of San Diego. A copy of this Analysis will be submitted with these Findings.

In the Xpera Report's "Final Determination of Economic Value for the Base Case Alternatives," the following information is presented on page 21 of 23.

The Base Development Project will retain the historic resource and build 45 new apartments. The Capitalized Value of the project will be \$9,848,476. The annual net operating income will be \$492,424. The Capitalized Value per unit will be \$205,177 and the Development Cost per unit will be \$184,476 per unit. The Economic Preference Rating for this project is #1.

Alternative 1 will build 18 new apartments. Its Capitalized Value will be \$3,681,216. Its Annual Net Operating Income will be \$184,061. The Capitalized Value per unit will be \$204,512 and its Development Cost per unit will be \$280,505. The Economic Preference Rating for this project is #5.

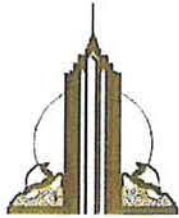
Alternative 2 will build 24 new apartments. Its Capitalized Value will be \$4,720,008. Its Annual Net Operating Income will be \$236,000. The Capitalized Value per unit will be \$196,667 and its Development Cost per unit will be \$242,363. The Economic Preference Rating for this project is #4.

Alternative 3 will build 24 new apartments. Its Capitalized Value will be \$4,923,168. Its Annual Net Operating Income will be \$246,158. The Capitalized Value per unit will be \$205,132 and its Development Cost per unit will be \$247,429. The Economic Preference Rating for this project is #3.

Alternative 4 will build 48 units. Its Capitalized Value will be \$9,863,980. Its Annual Net Operating Income will be \$493,199. The Capitalized Value per unit will be \$205,500 and its Development Cost per unit will be \$200,309. The Economic Preference Rating for this project is #2

When compared with Base Development Proposal, Alternative 1 will result in a 62.6% reduction in value, Alternative 2 will result in a 52.1% reduction in value, Alternative 3 will result in a 50.0% reduction in value and Alternative 4 will result in a 0.2% reduction in value.

The Xpera Report concludes that it is “our professional opinion that the optimal project is the Base Case, with Alternative 4 a close second.”



PINNACLE

International Development, Inc.

April 13, 2018

RE: EZABELLE PROJECT – 454 13th street

To whom it may concern,

I, Dennis La Salle, representative of property owner of address 424 15th St., San Diego, CA 92101, would like to express my full support for the proposed Nakhshab Development & Design project in the East Village Neighborhood known as EZABELLE. I have carefully reviewed all design aspects of this project and am pleased to support the design as proposed.

Thank you for including our support in your considerations and anticipate that this is going to be a positive addition to our neighborhood.

Kind Regards,

Dennis La Salle

619-231-7072

dlasalle@pinnacleinternational.ca

WWW.PINNACLEINTERNATIONAL.CA

424 15th Street • SAN DIEGO, CA, US • 92101 • Tel: 619-231-7072 • Fax: 619-231-2005

ATTACHMENT I

HP INVESTORS

April 16, 2018

RE: EZABELLE PROJECT – 454 13th street

To Whom It May Concern,

HPI-ROSARIO, LLC, property owner of 1220-1225 J Street, San Diego, CA would like to express our full support for the proposed Nakhshab Development & Design project in the East Village Neighborhood known as EZABELLE. We have discussed in concept all design aspects of this project and are pleased to support the design as proposed.

Thank you for including our support in your considerations and anticipate that this is going to be a positive addition to our neighborhood. If you have any questions, please feel free to contact me via phone or email.

Kind Regards,



Sumeet Parekh
Managing Partner

HP Investors
335 15th Street
San Diego, CA 92101

RE: EZABELLE PROJECT – 454 13th street

To whom it may concern,

I, David Allen, property owner of address 1492 K Street, San Diego CA 92101, would like to express my full support for the proposed Nakhshab Development & Design project in the East Village Neighborhood known as EZABELLE. I have carefully reviewed all design aspects of this project and am pleased to support the design as proposed.

Thank you for including our support in your considerations and anticipate that this is going to be a positive addition to our neighborhood.

Kind Regards,

David Allen

Name

A handwritten signature in black ink, appearing to read 'D Allen', is written over a horizontal line.

Signature

509-280-5469

Contact Number/Email

RE: EZABELLE PROJECT – 454 13th street

To whom it may concern,

I, Brendan Foote, Managing Member of Fabric 16th & K, LLC and property owner of 301 16th Street in East Village, would like to express my full support for the proposed Nakhshab Development & Design project in the East Village Neighborhood known as EZABELLE. I have carefully reviewed all design aspects of this project and am pleased to support the design as proposed.

Thank you for including our support in your considerations and anticipate that this is going to be a positive addition to our neighborhood.

Kind Regards,

Brendan Foote

Brendan Foote
Brendan@fabricinvestments.com
619.840.7721



Circulate San Diego
1111 6th Avenue, Suite 402
San Diego, CA 92101
Tel: 619-544-9255
Fax: 619-531-9255
www.circulatesd.org

April 24, 2018

Soheil Nakhshab, PE
Principal, CEO
Nakhshab Development & Design Inc.
340 15th Street, Suite 1
San Diego, CA 92101

Subject: **MOVE Alliance Certification for Ezabelle Project**

Dear Mr. Nakhshab,

On behalf of Circulate San Diego, whose mission is to create excellent mobility choices and vibrant, healthy neighborhoods, we are pleased to award a MOVE Alliance certification for the proposed Ezabelle project, an innovative and sustainable infill transit-oriented development project.

Ezabelle proposes a mixed use building with 48 micro-apartments, a bazaar courtyard that will feature small businesses, and will preserve a historic home built in 1881 on-site. The micro-apartments, which include bicycle racks in each unit, will be built with 12% of the units dedicated to Very Low Income affordable housing. The bazaar will provide a public space for the community on the ground floor courtyard with outdoor benches and greenery. The historic home will be incorporated into the ground floor of the building, providing human-scaled architecture and a unique design to complement the combination of historical and modern architecture on the project's block.

Located in East Village on 13th Street between Island Avenue and J Street, Ezabelle is one block from the Park and Market Trolley station, which will provide convenient transit access to the border, Mission Valley, and soon UCSD, along with many other destinations. The project is also located directly adjacent to cycle tracks that are planned for the Park Boulevard and J Street corridors, a major public investment in safe bicycle facilities that will connect residents throughout Downtown and to surrounding communities. While the project has optimal proximity to high quality transit and bicycle facilities, it is walkable to every day amenities like grocery stores and restaurants in addition to cultural venues such as the Downtown library and Petco Park.

For all of the above reasons and more, Ezabelle is the ideal project to be built without on-site parking. This game changing project will provide car-free renters in the market with the choice to live Downtown without having to shoulder the high cost of parking. Currently, the supply of this type of home does not meet the growing demand and Ezabelle can become a positive example for future development. Ezabelle not only provides a vibrant mixed-use infill project that adds to the area's housing stock, but it will also help the City of San Diego reach its Climate Action Plan goals by encouraging walking, bicycling, and taking transit for commutes.

Our certification is based on the current vision for the project as presented to the MOVE Alliance. We understand that changes are to be expected throughout the entitlement process; however if there are

significant modifications to the project which reduce its commitment to sustainable and compact transit-oriented development, we reserve the right to re-evaluate significant changes to the project to maintain our certification.

Congratulations on earning the MOVE Alliance certification for Ezabelle, an innovative development which fosters sustainable modes of transportation.

Please be encouraged to use the MOVE Alliance certification and logo as you move through entitlement and marketing for your project.



Sincerely,

A handwritten signature in blue ink that reads "Colin Parent". The signature is fluid and cursive.

Colin Parent
Executive Director and General Counsel

THE MOVE ALLIANCE was formed in 2012 to provide certification for transit-oriented, smart growth projects in the San Diego region. MOVE Alliance members consist of local experts in smart growth planning and sustainable transit oriented development disciplines, including planners, developers, urban designers, and transportation engineers. By recognizing and supporting projects which meet the MOVE Alliance criteria, we can help to create complete communities, one project at a time.

<http://www.circulatesd.org/move>



May 07, 2018

Reese Jarrett, President
c/o Brad Richter, Vice President Planning
Civic San Diego
401 B St. 4th Floor – sent electronically
San Diego, CA 92101

Re: Nakhshab Development & Design: Ezabelle - 454 13th Street

Dear Mr. Jarrett:

East Village Association, Inc. (EVA) represents San Diego's largest downtown neighborhood encompassing 130 blocks between Seventh Avenue and 17th Street. An arts and industrial neighborhood in transition, EVA is the non-profit organization that manages the East Village Business Improvement District, which currently represents 700 members and 13,000 residents. EVA's mission is to support and promote neighborhood businesses and residents by establishing the community as San Diego's livable urban village where people and the entrepreneurial spirit thrive through the distinct mix of arts, culture, education, and entertainment.

On May 03, 2018, the EVA Executive Board met for a review of the Ezabelle, 454 13th Street project. Typically, EVA meets in coordination with the East Village Residents Group (EVRG) for the voluntary joint Pre-Design Committee review; however due the timing and the Civic Ezabelle project review schedule, Ezabelle presented exclusively in front of EVA. After careful discussion, and consideration of EVRG letters entered into the record, EVA supports this project, with one objection, contingent upon:

- a) Should the project proceed as a "pet-friendly" property, property management needs to find a pet relief area, and maintain a level of cleanliness; and
- b) There is recognition that the project does not offer any parking, and will be the third apartment building on the 13th Street footprint with no parking. One suggestion presented, would be that if the project gets rid of the curb cut, 2 spaces could be created for short-term retail parking.

If you have questions, please contact Dora McCann Guerreiro, EVA Executive Director via email at dora@EastVillageSanDiego.com or call 619.546.5636.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. McCann'.

Dora McCann Guerreiro, Executive Director
East Village Association, Inc.

May 8th, 2018

Dear CivicSD,

I am writing you this letter to express my concerns regarding the proposed "Ezabelle" Project (File Number: CCDP/SDP 2018-07). As a 6yr home owner in East Village, (Park Boulevard East 1225 Island Ave) my family and I have supported and seen the benefit of the current "boom" in residential real-estate development in East Village. However, we cannot in good conscious support this project.

The first and biggest problem we have is that this would be the **third** apartment building on the same street with zero parking. This is a safety & security issue. Not having any parking for the residents, will demand they park on an overly saturated street of vehicles. This part of East Village is already rampant with crime, and homeless. San Diego cannot in good conscience allow this to proceed. The first two (434 and 435 13th street "The Studios") are currently under construction, and are adding 86 new units to the street with zero parking. Ezabelle would add an additional 48 units to the same block again with no parking. If this project is approved it would total **134 residential units on one block with zero parking.** I understand that "The Studios" were already built but vacant, which is why we as residents supported the reconstruction. Yet, I cannot see how the city could approve a **third apartment building with zero parking on the same street.** Please note: the police records for the disturbance calls in that area are high in volume. This isn't providing a safe place for those residents, and the residents of the existing building, like Park Blvd East.

Secondly, this building is going to have a direct adverse effect on the equity of Park Blvd East, and other condo, & independently owned units. The current proposed plans of an additional apartment building doesn't ensure more homeowners in the area, only renters. We've invested our hard earned money in this area for hopes of appreciation, and establishing a good financial decision. Renters do not add that security, especially when so many are focused to be located on such a dense area. Park Boulevard East is a great investment for the owners of those condos, and allows the few renters we have, to be inspired to own their one home one day. I can confidently say that "Ezabelle" would be an unacceptable over-development of a site, which already contains the historic Wright House. The attractiveness of the area, investment potential for families and future homeowners would be gone if this building was approved.

We understand East Village is rapidly growing, and believe that expanding development projects are good for certain parts of the community, but this project is simply too much. They are utilizing the City's Affordable Housing Density Bonus to expedite this project and not require parking, but only **SIX units will be for low-income residents.** We have concluded that only having 6 low income units is

not a justifiable use of the Density bonus, and is a gross misrepresentation of that program. Local businesses & residents rely on the already limited street parking, and adding 48 more units will not help anyone. I urge EVA to not support a third apartment building on one city block with zero parking. There is so much potential to restore the Wright House, and not build simply on top of it.

Respectfully,

Eric & Meghan Atilano

Park Blvd East Residents & Homeowners.

James,

Attached are the three letters I have received already regarding this project. There will be many more to come but we were under the impression it wouldn't be needed to be submitted to you until Friday. After our phone call, I understand you need them by noon on Thursday to be included in your report. I will try to get them to you as soon as I can.

Some highlights:

If this gets approved it will be over 130 units on one block with ZERO parking. While we do understand that there is a trolley station nearby, people in this city still need cars. Especially low income residents. There is already limited parking on our block. Business needs parking as well.

While we understand the EVA approved this project, we were notified last minute of the meeting and were not able to voice our concerns so it was a one-sided conversation.

East Village houses almost 90% of the low income housing already, adding six more units does nothing.

No attention has been paid to the South and West-facing walls both of which face over 40 residential units.

The entrance to Ezabelle is in the back, which greatly concerns the residents of Park Boulevard East for security.

The developer seems to have reached out to everyone in East Village except the people who are most affected, the neighboring residents.

The building does no justice to the original design of the Wright house, and as you mentioned is going to now have one room as a trash receptacle.

If there is an emergency like a fire, is part of their plan to utilize Park Boulevard East? How does the fire department get in from the back without us?

He refers to this as a "Middle-Income" housing but he is receiving the Low Income exceptions for only 6 units.

There is no close rentable street parking, and the closest ones during parking season are over \$250 dollars a month and are not guaranteed to find spots.

There are more that other residents have brought up, but that is all I can think of at this time.

Thanks for taking the time to talk to me today and I will see you tomorrow.

Letter to CivicSD

May 3rd, 2018

Dear Civic,

I am writing to express my concerns regarding the proposed "Ezabelle" Project (File Number: CCDP/SDP 2018-07). As a resident and home owner in East Village, (Park Boulevard East 1225 Island Ave) my family and I have supported and seen the benefit of the current "boom" in residential real-estate development in East Village. However, we cannot in good conscious support this project.

The first and biggest problem we have is that this would be the third apartment building on the same street with zero parking. The first two (434 and 435 13th street "The Studios") are currently under construction, and are adding 86 new units to the street with zero parking. Ezabelle would add an additional 48 units to the same block again with no parking. If this project is approved it would total **134 residential units on one block with zero parking.** I understand that "The Studios" were already built but vacant, which is why we as residents supported the reconstruction. Yet, I cannot see how the city could approve a **third apartment building with zero parking on the same street.**

Secondly, this building is going to have a direct adverse effect on the residential privacy and sunlight access of the residents in Park Boulevard East. The current proposed plans only show the street side view of the building, and does show how much this building would overshadow Park Boulevard East. I can confidently say that "Ezabelle" would be an unacceptable over-development of a site, which already contains the historic Wright House. The minimal sunlight that our gardens do get would be gone if this building was approved. The developer has paid little attention to the South and West facing walls which will directly impact over 50 units in Park Boulevard East.

I understand that East Village is rapidly growing, and believe that expanding development projects are good for the community, but this project is simply too much. They are utilizing the City's Affordable Housing Density Bonus to expedite this project and not require parking, but only **SIX units will be for low-income residents.** Local businesses rely on the already limited street parking, and adding 48 more units will not help anyone. I urge CivicSD to not support a third apartment building on one city block with zero parking. There is so much potential to restore the Wright House, and not build simply on top of it.

Respectfully,

Benjamin and Samantha Bowen

Dear CivrSD,

I am writing you regarding the Ezabelle project on 13th and Island. I am NOT in favor of this project. I am an East Village resident and business owner (Realtor) in East Village. The fact that this project offer absolutely no parking on a street where there already are two buildings with no parking on 13th is pretty upsetting. I get that this project offers low income housing, but only 6 out of the 48 units are low income. It would be nice to think that noone owns a car and would walk the neighborhood, but that is really not realistic. I rarely drive but still need somewhere to park my vehicle.

Also, squeezing a project above and next to two historical projects in SD is upsetting. These buildings have been here for decades and should be celebrated, not built around. I do have a lot to say on this project, (and frankly all of my neighbors do as well) but am in between appointments and need to head out to another one now.

Being a Realtor I am all for building in San Diego, but it should make sense.

I hope this letter and other letters let you know how we as residents feel about this. Thank you for your time and considerations!

David Spiewak

REALTOR®

(858) 527.2269

Coldwell Banker Residential Brokerage

James Alexander

From: Nadia Bruno <nadiasbruno8@gmail.com>
Sent: Wednesday, May 09, 2018 5:56 PM
To: christopherward@sandiego.gov; mbchase@sandiego.gov; belliot@sandiego.gov; fpstark@gmail.com; cce@carrierjohnson.com; Brad Richter; James Alexander
Subject: ***STOP*** "Ezabelle" File Number: CCDP/SDP 2018-07

Dear San Diego Local Officials and Residents of this Finest City,

I'm writing as a concerned resident of the Park Boulevard East building located between Park and 13th streets on Island Avenue.

The proposed "Ezabelle" project would greatly constrict the amount of street parking available within the radius of this block. "The Studios" currently under construction at 434 and 435 13th Street 92101 also do not contain designated parking per unit within an 86 unit building. During Padre's games many of the streets are re-directed or closed and this just adds to the congestion.

Another concern is that the project encroaches onto the residents balconies within the already tight space. Once construction is underway, there would be dust, debris and massive amount of noise. We're already living through the many buildings being built and that noise for years, to have it at each level as this is being built upwards is unacceptable. There is also the fact that each resident will lose privacy, any plants or foliage and sunlight on said balconies.

As for the safety of the entrance to the "Ezabelle" building facing our courtyard, is there a plan if there is an emergency like a fire, is part of their plan to utilize Park Boulevard East? How does the fire department get in from the back without access from our building?

I understand that the growth of the East Village is vital to the City of San Diego but this project goes too far. The Wright House and the historical home/law firm on the corner are valuable additions to the character of the neighborhood. It is also my understanding that the developer seems to have reached out to everyone in East Village except the people who will be most affected, Park Boulevard East.

I urge you to not support a third apartment building on one city block with zero parking. There is so much potential to restore the Wright House, and not build simply on top of it.

Respectfully,

Nadia Bruno

May 9, 2018

Re: Proposed Ezabelle Mixed-Use Project
Development Permit No. 2018-07

Civic San Diego,

The East Village Residents Group (EVRG) represents over thirteen thousand residents who currently live in the East Village District of Downtown San Diego. EVRG's mission is to promote a better quality of life and family environment for every resident in our District.

Concerning the proposed Ezabelle mixed-use project, the EVRG feels that they cannot support this project until the following concerns are addressed:

Considerations of the Design Elements:

Relationship of the new structure to the historic structure is unfortunate. The problem lies in the massing of the new architecture: it sits directly on top of the little yellow historic house. The views shown on pages A5.2, A5.3 and A5.4 of the presentation drawings clearly illustrate this point.

Although the architect stated that the owner of the property to the north will obtain permission to move the Victorian home, that seems unlikely since the structure is a valuable asset to East Village and the downtown area. Therefore, the north façade of the Ezabelle project should be revisited, recognizing its permanent relationship to the beautiful Victorian.

The west façade makes no attempt to acknowledge that this wall will be *the view* for all the neighbors in the building to the west. It is accepted, and not disputed, that the loss of the existing long vistas is not relevant. That said, there is no need to create intentional blight: some effective architectural gesture or articulation should be employed.

Urban Planning Issues:

The city block where the proposed project is to be located will already be heavily impacted by 86 new studio units, with no parking. The cumulative effect of un-parked 134 new market rate units in one block will be significant. The availability of utilizing our parking structure is seasonal and sporadic due to events at Petco Park.

The low cost housing apartment units in the East Village neighborhood presently make up over 34% of all apartments. If affordable housing units are to be incorporated into new market rate developments, two and three bedroom apartments for families should be encouraged.

As frequently happens, individual projects evoke discussions on larger issues. Our hope is that all issues noted will be addressed in this project, and all projects moving forward by the developers, and by Civic San Diego.

Thank you for your time in considering these comments.

Kathleen Hallahan
President, East Village Residents Group

James Alexander

From: Eric Sal <eric.salavat@gmail.com>
Sent: Wednesday, May 09, 2018 5:33 PM
Cc: christopherward@sandiego.gov; mbchase@sandiego.gov; belliot@sandiego.gov; fpstark@gmail.com; cce@carrierjohnson.com; Brad Richter; James Alexander
Subject: Stop Project Ezabelle

May 9, 2018

To whom it may concern,

I am writing to express my concerns regarding the proposed “Ezabelle” Project (File Number: CCDP/SDP 2018-07). I am an owner in Park Blvd East which is directly adjacent to the new proposed building. Myself, and many of my fellow residents do not support this project.

The biggest impact this will have on residents is parking. There is already too little parking on this block. There are currently two other apartments under construction on the same block with zero parking. This project would add an additional 48 units with zero parking.

The developers are using the Affordable Housing Density Bonus to not require parking, however only 6 of the 48 units will be low income housing. This is just a technicality they are employing to get their building approved with zero parking. This would be devastating to the current residents of the area.

Sincerely,

Eric Salavatcioglu

James Alexander

From: Steve S <gospectrum@gmail.com>
Sent: Wednesday, May 09, 2018 7:31 PM
Subject: Stop project Ezabelle (File number: CCDP/SDP 2018-07)

To whom it may concern,

I'm a resident and homeowner in East Village (Park Boulevard East 1225 Island Ave) and I'm writing to express my concern with the proposed project Ezabelle (File number: CCDP/SDP 2018-07). My major concern is the number of residential units on this block with zero parking spaces. The neighborhood cannot support the number of vehicles this type of development requires. Please consider the impact of the number of residential units on this block without off street parking. There are already 86 new units "the studios" under construction on the same block with no off street parking. There cannot be justification for an additional 48 units without off street parking.

I urge you to **not** support the proposed Ezabelle project as it is a clear example of over-development. Thank you for your consideration.

Sincerely,
Steve Sjoberg

James Alexander

From: Cari Melton <carolann.melton@gmail.com>
Sent: Thursday, May 10, 2018 9:51 AM
To: James Alexander
Subject: Ezabelle Project Proposal--Please Vote To Stop This Development

Dear Mr. Alexander,

I am writing to you to share my concerns in regards to the Ezabelle Project, a proposed nine-story building in the small lot of 454 13th Avenue, in the East Village. My family and I are homeowners at 1225 Island Avenue. Our building has entrance points and units around the block on 13th Ave; Park Blvd; and Island Ave. While I understand that more housing is needed in San Diego, the impact of the project is detrimental to our neighborhood, our block and our building. These challenges may not be immediately obvious when looking at the proposal so please consider the following and **vote to eliminate this project** or to find a more suitable location.

Overall, I support the idea of more housing options in San Diego but there are currently two apartment housing projects underway on the small block of 13th Avenue, between Island and J streets. The addition of the Ezabelle Project would make that 3 new apartment buildings on the same street with NO designated parking for more than 140 new units, further impacting the limited resources of parking for residents, guests, businesses, service vehicles and deliveries. Despite the close proximity to the Trolley, many people rely on their cars for employment and family needs that cannot be addressed by public transportation in a realistic way. The Developer was able to present the proposal without parking by offering 6/48 units for residents with very low incomes. The East Village already has 90% of the housing options for neighbors with low incomes and six more units is an insignificant addition--not enough to begin to justify the negative impact of this excessive project on the current residents/neighborhood.

Despite contacting others in East Village, **the Developer did not reach out to the HOA of Park Blvd East**, which is troublesome as we are the residents who will be most impacted if this project is approved. The proposal shows a street view of the project from 13th Avenue but does not address the extreme proximity and impact on Park Blvd East. The plans do not give attention to the South and West facing walls that will be facing and practically touching our building, directly impacting more than 50 residential units...our HOMES! The project would essentially block the view of the sky, all sunlight and fresh breezes to most of the units of Park Blvd East Condos--our home for the past 9 years. We purchased our home because of the location and view. I understand that we do not "own" the view but should the residents of our building suffer loss of value and quality of life so that a new, excessive project can happen? How is that equitable? The value of our homes will decrease significantly if this project happens and we will be forced to leave or to have the Ezabelle building pressed up against our patio, within close view of all of our windows. Especially with a small daughter, I am uncomfortable with that possibility. Furthermore, the entrance to the Ezabelle building is designed to be in the "back" of the lot, essentially next to our small, common-area courtyard. Security has been an ongoing issue that we have recently managed to control with expensive modifications and now we could have constant foot traffic and noise in our vulnerable area once again? Unacceptable!

The historic yellow Wright house that is currently on the lot is a welcome change to the increasing number of mid and high rise buildings in the immediate area. Additionally, the plan to incorporate the home into the design does not preserve the beauty or charm of the building with its sloped roof, skylights and porches. We understand that one room in the home would actually be used as the trash receptacle! Additionally, Ezabelle

Project would overshadow the historic Sheldon Home on the corner of 13th and Island, further reducing the charm of the entire area.

Beyond the impact on the beauty of the neighborhood, I have concerns in regards to the safety plan for this building. Adding 48 units to an area that was designed for one, single-family home seems to be a further stretch on resources, especially with an entrance located at the back of the lot, not directly accessible from 13th Avenue by emergency crews.

Families, homeowners and voting citizens help to stabilize a neighborhood. We want East Village to be the interesting, inviting, Arts District it was meant to be! Please do not allow it to become a generic, over-crowded portion of the city that people pass through in order to get to Petco Park or to The Gaslamp District. Please help to retain some of East Village's charm and appeal so that it is pleasant for all residents and visitors, now and in the future. As a teacher and a Veteran, my husband and I struggled 9 years ago to purchase our home and obviously, we want our home to remain pleasant and to retain its value but we also recognize that the Ezabelle Project is an excessive addition to this portion East Village due to traffic concerns, parking issues and over-crowding!

In closing, our 3 year old daughter summed it up for me when I told her that I was finishing a letter to our city leaders to ask for help to stop the possibility of a building in our "backyard" (patio). Grace said, "Building go away!!! No more sun for Jude-Jude!" (our dog Jude loves the direct sun that streams through our bedroom window during the spring and summer! A seasonal treat!)

I welcome any questions or comments from you and I truly appreciate your time.

Carol Ann Melton
619-993-6156

James Alexander

From: Vickie Monegan <vickie1.04@verizon.net>
Sent: Thursday, May 10, 2018 10:08 AM
To: christopherward@sandiego.gov; mbchase@sandiego.gov; belliot@sandiego.gov; fpstark@gmail.gov; cce@carrierjohnson.com; Brad Richter; James Alexander
Subject: Ezabelle Project (File #CCDP/SDP 2018-07)

Good morning.

My name is Vickie Monegan. I am a resident of Park Boulevard East. My husband and I are retired and purchased our condo in May of 2017.

In just 12 months, we are amazed at the building in East Village. One morning we woke up and discovered our view of the Coronado Bridge is going to disappear. I do not know the quantity of apartments being built down the street by Petco, but walking by and seeing how huge this project is tells me traffic is going to be a nightmare. I've been told that this project was approved based on the builder/owner providing low income housing. We get it – but what an opener that building everywhere seems to be a priority of the City regardless of how the San Diego downtown residents feel about this. One morning during this time we learned about the 34 story building going up on the corner of Market and Park. Both of these projects will have “low income residences”. It's apparent that “low income housing” guarantee is how these builders are approved to build.

I am against this project for numerous reasons.

- Parking is already a major issue downtown – there simply isn't enough parking for the 8th largest city in the country. East Village parking is impossible. We have actually had to have our family park in a hotel in Cortez Hill for the weekend and pick them up to bring to our home. Construction on 13th (between Island and J) has been going on since I have lived there. Between Island and J and 13th and 14th, construction on both sides to renovate condos “for low income again”, has been going on since I moved in. Both of the condos DO NOT PROVIDE PARKING. Now you are approving another large condo complex in the exact same area that DOES NOT PROVIDE PARKING. What are you thinking??? What about handicap parking which I highly support since I am handicapped. There are a few handicap parking spaces on 13th by this project that HAS NOT BEEN AVAILABLE SINCE I MOVED IN BECAUSE OF CONSTRUCTION AND THE CITY HASN'T PROVIDED TEMPORARY HANDICAP PARKING IN THIS AREA DURING THIS CONSTRUCTION! Since the existing two buildings under renovation do not have parking, where are those handicap individuals supposed to park. Where are the handicap people who will occupy the Ezabelle building supposed to park? Furthermore, with the Ezabelle project and the two renovation projects (in the same location) which provide no parking adds up to 134 units. That's 134 parking spaces. If there are two people per unit, that's 268 parking spaces needed. Have you even considered this?
- The fact that the builder didn't inform our building about this project is UNACCEPTABLE. I feel like they are sneaking in another project just to make the almighty dollar. I know how this works and I am sure you DO TOO.
- My husband and I have reviewed the tentative plans. My husband is a retired construction project manager where he supervised tilt up buildings. We walked down to our courtyard and found that the one renovation building completely blocks any sun light from about a 1/3 of the courtyard. Looks like a cave and no vegetation will grow. When we walked to the other side and my husband mentally surveyed the boundary lines, we could see that this new project will block all sunlight from the balance of our courtyard. The courtyard is small. This project will be extremely close to our building and will definitely destroy any peace those residents have of feeling like they have a yard. Downtown is a cement city – our residents need sunlight – our residents need some privacy – our residents need peace. Have any of you even taken the time to come and inspect the issues

this is going to create for our building or the streets? I welcome each of you to join us and see what we are already experiencing and what is to come of this should this building go up.

- I saw on the project that the bottom floor of this building is supposed to be designated as business. Seriously, have you even seen what is happening in East Village. You want low income housing – what about low income rates for businesses. I cannot believe the amount of businesses I have seen close down because they cannot afford the rent. Having this builder provide “business space” on the bottom floor is a joke if the rent isn’t low enough for them to operate. Salvucci’s closed down because of the rent. The Bottega Americano closed down because of rent. I heard this week that the Thomas Jefferson School of Law is going to move because of rent – seriously?
- Do any of you live downtown? Do any of you walk the streets of East Village? I feel like so much interest is given to the Marina District and the Gas Lamp area. We were told by friends that East Village is going to be an upcoming and awesome community and that was the place to buy. So we did. We live with low housing rent and half way houses all around us. I don’t feel safe at all. You just keep adding to the problem and I am requesting that you please stop. I am sure that you are under pressure by groups to provide low rent housing but with this comes problems for our community and there is already enough.
- In my opinion, there is already limited to no parking available for businesses in East Village. With the already two renovation buildings and now with this projected new building providing no parking, how are the current businesses supposed to provide services. People will stay away and go somewhere else that is more convenient.
- The entrance to this new project is in the back which concerns our residents. I feel this is a major security issue.
- In my opinion I feel it would be extremely unsafe to build this project. What if there is a fire – it is so close to us that our building could catch on fire. Since the main entrance is in the back – would the fire department need to come through our courtyard to get to the emergency.
- What about street lights. If I recall, there aren’t any on 13th between Island and J. WHY???? Most of the time a new builder is required to pay for street improvement – street lights. Is this builder being required to install street lights for the safety of our community?

Thank you for the time you have spent reading my concerns. I do hope you all would consider meeting with the residents of Park Boulevard East so you can see for yourselves the impact this project would have not only for Park Boulevard East, but the surrounding residents as well.

Vickie Monegan
1225 Island Avenue, #404
San Diego, CA 92101

James Alexander

From: Brandon Montgomery <brandon.montgomery@gmail.com>
Sent: Thursday, May 10, 2018 8:43 AM
To: christopherward@sandiego.gov
Cc: mbchase@sandiego.gov; bellott@sandiego.com; fpstark@gmail.com; cce@carrierjohnson.com; Brad Richter; James Alexander
Subject: Project Ezabelle

To Whom it may concern,

Since I've purchased into and resided at Park Boulevard East, 1225 Island Ave., my experience in East Village has been continuously improving. I am normally very welcoming to all the new development because it's the best for the East Village as a whole, but I don't see the need for or want for Project Ezabelle to proceed.

As a resident on the east facing side of Park Boulevard East, my view will be directly impacted with the new building. When I decided to acquire my unit, I did so partly because of the calming views of the historic Wright House and morning sunshine. I would be very disappointed to have this aspect negatively impacted.

Another issue I have with building is the additional parking congestion that will be created with so many more additional units located on a small block. Finding open and available parking is already an issue with during peak periods. With the activation of Ezabelle and the reactivation of the 434 and 435 Studios, I see the parking for guests and customers of local business to become like parking in Ocean Beach, North Park and Mission beach.

Please consider not continuing the development of Project Ezabelle as it stands.

Regards

Brandon Montgomery

James Alexander

From: Adam Moss <ammsd6@gmail.com>
Sent: Thursday, May 10, 2018 9:23 AM
To: christopherward@sandiego.gov
Cc: mbchase@sandiego.gov; James Alexander; Brad Richter; cce@carrierjohnson.com; fpstark@gmail.com; bellriott@sandiego.gov
Subject: Ezabelle Project

To Whom It May Concern,

I am a home owner in East Village and live at Park Blvd East. I have many concerns with the proposed Ezabelle project (File Number CCDP/SDP 2018-17).

Parking is already a massive issue with family, guests, service contractors who come to visit my home. Typically, a guest of mine is forced to park 4-5 blocks away. This means they are parking on 17-18th st which most guests do not feel safe leaving their car in that area and fear for their personal safety. Ezabelle adds an additional 48 units to my block and provides no parking at all?!? Combined with the 2 other complexes being built on my block, this is a total of 134 residential units with no parking available. I anticipate this issue will force guests to park east of the 5 freeway. This means guest will no longer even be parking in downtown, they will be parking in Sherman Heights. East village is home to many events, most prominent is the Padres. Padres games immediately raises all parking spots to \$25. Those prices are not reasonable for a guests who simply coming to visit my home.

The other main issue for parking is businesses. East Village (between Park-16th st) is doing a great job of adding residential units but businesses such as restaurants, gyms, dry cleaners, etc.. will have no parking available. Local businesses need parking available or it will never be feasible for consumers who do not live downtown to visit them.

I have looked at the building plan for Ezabelle and it will cast a shadow on Park Blvd east. This will affect approximately 50% of building. These east facing units will now receive very minimal sunlight making them less desirable.

It seems to me that this project is taking advantage of affordable housing density bonus but this complex is only providing 6 low income residents. I would love to see the Wright House restored and not demolished. I urge you to not support Project Ezabelle.

Thank you for your Time,

Adam Moss

James Alexander

From: Woody <woodyaal@aol.com>
Sent: Friday, May 11, 2018 3:35 PM
To: christopherward@sandiego.gov
Subject: Project Ezabelle

Hello,

I live in the East Village at Park Blvd. and Island Ave. I am writing to object to the Ezabelle project proposed for 13th Street between Island Ave. and J Street.

This proposed project is on a street with two other buildings with about 90 units that do not have parking. They are proposing 48 more units on this street with no parking. There is already extremely limited parking on 13th street to begin with between Market and where it ends at K St. On top of this the project is trying to "work the system" and get an exemption for lack of parking because there will be 6 units that are "proposed" low income.

From the plans the building will be built almost to the fence of Park Blvd. East, where I live. With a planned back entrance and a project taking up almost the entire lot there will be not ingress or egress to speak of for fire services. This hidden entrance is also a security risk for our building. The way the building is proposed will remove a lot of privacy from our building. They had to jack knife the project onto the property.

They have made up a design for the historic house where the building sits right on top of it making the house look like a pancake. It completely takes over and distracts from the original house. One room will be a trash room making taking away completely from the historic nature of the house.

There are not any close parking garages for rent. The garage the Padres owns rents during the off season for \$250 a month.

The East Village has almost 90% of the low income housing already. The 6 units they would add are unnecessary and would be only "proposed". It is time to distribute low income housing throughout San Diego and share the obligation to build low cost housing in an area.

Please reject this project as it is not an addition to the neighborhood and will subtract from the quality of life in this area.

Regards,

Sarah Woodruff Watkins (Woody)

James Alexander

From: Vickie Monegan <vickie1.04@verizon.net>
Sent: Saturday, May 12, 2018 1:12 PM
To: christopherward@sandiego.gov; mbchase@sandiego.gov; belliot@sandiego.gov; fpstark@gmail.gov; cce@carrierjohnson.com; Brad Richter; James Alexander
Subject: Ezabelle Project (File #CCDP/SDP2018-07) 2nd Letter

Hello again everyone:

This is my second email to all of you. This morning I experienced a conversation with a young lady who is presently renting a unit on the 4th floor of our building at 1225 Island Avenue (Park Boulevard East). We were waiting on the elevator and I asked, "how are you", she replied the following:

"I'm not doing well. The owner of my rental condo has informed me that they are going to sell the condo and I need to find a new place to live. I would love to buy the condo but with that new building going in, I don't want to look in someone else's condo or want someone looking into my condo. This project is too close to our building. I don't blame the owner for wanting to sell. I am meeting a real estate agent right now to look at condos for sell in the area".

When I existed the building with her, the agent was waiting for her.

ALARM PEOPLE!!!!!!!!!!!!!!!!!!!!!! This is not good for our community or the residents at Park Boulevard East. I realize this project isn't exactly approved by you yet but the panic is already starting because of it.

Please reconsider any thought of approving this project.

Vickie Monegan
1225 Island Avenue, #404
San Diego, CA 92101
(909) 374-3216

May 14, 2018

Dear CivicSD Board,

A request is being made to have the Board ensure that sufficient community review time is provided prior to the full CivicSD Board vote on the Ezabelle project, CivicSD Project No. 2018-07.

Based on the results of the May 16 DRC meeting, a CivicSD staff recommendation will be made to the Board to recommend Design Review Approval and Planning Commission approval of CivicSD No. 2018-07 CCDP/SDP permits. This will follow the DCPC review scheduled to be conducted shortly.

The public notice associated with the Ezabelle project indicated that a full Board review would follow one week from the DCPC meeting, if so, that would place Ezabelle on the May 23 Board agenda. It is assumed this would be conditioned on completion of the City engineering preliminary review (IB630) of the project. That being said, as a community partner, it is requested that the Board address the Ezabelle project no earlier than the regularly scheduled June 27 Board meeting. The reason for the request is two-fold.

First an *independent* community based working group assessment of the projects compliance with the CCPDO and DCP is underway; preliminary results indicate areas of non-compliance and inconsistency; however more time is needed to fully flesh out these concerns. The group may seek consultation of certified design professionals and/or civil engineers in which case they will provide their independent assessments to the Board. A core value of CivicSD as the politically entrepreneurial development partner of the City of San Diego is to respect the community as partners. It is hoped the Board will adhere to this in its decision to ensure sufficient community review time.

The second reason for the request to push out the Board review of the Ezabelle design is it is believed that the Board, per corporate bylaws, should formally elect an interim CivicSD President prior to considering any planning related matters involving the CCPDO. CCPDO 156.0304(a) states the President *shall* administer the CCPDO and ensure compliance with the procedures and regulations of the CCPDO, as well as the DCP and other applicable documents.

It is understood that the CFO has informally assumed the duties of the interim President and has publicly used a dual hat title of COO. The capabilities of the CFO to perform *operationally* as the President are not being contested. However, as the Board is undoubtedly aware, a basic tenant of good management practice is to document and formalize responsibility and accountability within the organization. If the Board seeks the CFO to assume interim Presidential responsibility and accountability, it should be formalized through a Board election as specified in the corporate bylaws. If the Board seeks to have a COO assume the responsibility and accountability duties in lieu of a President, the corporate bylaws and CCPDO should be addressed.

Thank you for your consideration.

Very Respectfully,

John Smith, Member

Ezabelle Community Partner Working Group

James Alexander

From: Jesse Tenenbaum <jtenenbaum@guildmortgage.net>
Sent: Monday, May 14, 2018 1:58 PM
To: christopherward@sandiego.gov; mbchase@sandiego.gov; belliot@sandiego.gov; fpstark@gmail.com; cce@carrierjohnson.com; Brad Richter; James Alexander
Subject: "Ezabelle" Project

To Whom it May Concern

I am writing to express my concerns regarding the proposed "Ezabelle" Project (File Number: CCDP/SDP 2018-07). As a resident and home owner in East Village, (Park Boulevard East 1225 Island Ave) my family and I have supported and seen the benefit of the current "boom" in residential real-estate development in East Village. However, we cannot in good conscious support this project.

The first and biggest problem we have is that this would be the third apartment building on the same street with zero parking. The first two (434 and 435 13th street "The Studios") are currently under construction, and are adding 86 new units to the street with zero parking. Ezabelle would add an additional 48 units to the same block again with no parking. If this project is approved it would total 134 residential units on one block with zero parking. I understand that "The Studios" were already built but vacant, which is why we as residents supported the reconstruction. Yet, I cannot see how the city could approve a third apartment building with zero parking on the same street.

Secondly, this building is going to have a direct adverse effect on the residential privacy and sunlight access of the residents in Park Boulevard East. The current proposed plans only show the street side view of the building, and does show how much this building would overshadow Park Boulevard East. I can confidently say that "Ezabelle" would be an unacceptable over-development of a site, which already contains the historic Wright House. The minimal sunlight that our gardens do get would be gone if this building was approved. The developer has paid little attention to the South and West facing walls which directly impact over 50 units in Park Boulevard East.

I understand that East Village is rapidly growing, and believe that expanding development projects are good for the community, but this project is simply too much. They are utilizing the City's Affordable Housing Density Bonus to expedite this project and not require parking, but only SIX units will be for low-income residents. Local businesses rely on the already limited street parking, and adding 48 more units will not help anyone. I urge you to not support a third apartment building on one city block with zero parking. There is so much potential to restore the Wright House, and not build simply on top of it.

Respectfully,

Jesse Tenenbaum

James Alexander

From: George Aban <g_aban@hotmail.com>
Sent: Wednesday, May 16, 2018 1:47 PM
To: christopherward@sandiego.gov; mbchase@sandiego.gov; bellriott@sandiego.gov; fpstark@fmail.com; cce@carrierjonson.com; Brad Richter; James Alexander
Subject: Ezabelle Project number CCPD/SDP 2018-07

To whom it may concern:

I am want to express my concerns regarding the new Ezabelle Project. As a resident and homeowner in East village (park blvd east, 1225 Islan Ave, San Diego, CA 92101), I don't support the Ezabelle Project. There are two studio apartment buildings on 13th that are under construction with no available parking. A third apartment building (Ezabelle) is under review with no plans of parking for there tenants. This is a big issue. Parking on 13th street and other local streets are already congested. I cant see as to why the city would approve a third apartment building with zero parking. With the East Village rapidly growing, parking for business and its residents are rapidly diminishing.

I urge you to not support the third apartment with zero parking.

Respectfully,

George Aban
Home Owner at Park Blvd East

James Alexander

From: Michelle Brower <brower.michelle@yahoo.com>
Sent: Wednesday, May 16, 2018 4:54 PM
To: chistopherward@sandiego.gov
Cc: mbchase@sandiego.gov; bellott@sandiego.gov; fpstark@gmail.com; cce@carrierjohnson.com; Brad Richter; James Alexander
Subject: Ezabelle project

Michelle Brower

1225 Island Ave, Unit 217
San Diego, CA 92101
May 16, 2018

To whom it may concern,

My name is Michelle Brower, I'm a registered nurse at a local hospital and have been a resident of East Village for over 3 years. I am now a home owner in East Village. Coming from a big city, Washington D.C., I was enticed to live in downtown San Diego with the hopes to have a similar city life. I have supported the growth and progress that the city is making, and I am quite aware of the housing difficulties in San Diego. I am writing to you today with regards to my concern of the new "Ezabelle" development (file number CCDP/SDP 2018-07).

I supported "The Studios" (434 and 435 13th street) transformation, and as they are existing building being revamped I understand why they are not able or required to have parking for their 86 studio units. I cannot in good conscious support the "Ezabelle" project as it would be the third building on this block, adding 48 units with ZERO parking. This would total over **130 units** on this one block with absolutely **ZERO parking**. Since this project is being built from scratch the developer is capable of including parking in the design.

I personally tried to live without a car in San Diego, as I did in D.C., but quickly discovered how difficult it is to get many places solely using public transportation. Street parking in East Village is not abundant either. There is weekly street sweeping which limits the amount of overnight parking on any given night. During the day most parking spots are either 2 hour metered or 30 minute zones. There is very limited parking in the garages downtown as well; and garage spots average between \$180- \$250 a month if you are able to acquire one. These spots may not be guaranteed, especially during events. This doesn't even begin to take into account the street closings when there are Padres games. Business and guests rely on the scarce street parking already.

The 8-story proposed design of the project would oppress the historical landmark that was well-maintained before purchase by the current developer. There is no mention for designs, other than plain concrete walls, of the south and west facing walls which would directly impact the current neighborhood residents of Park Blvd East. Not to mention this proposed building would tower more than 30 ft above any other structure on this block and eradicate sunlight to existing gardens. "Ezabelle" would not embrace the historic site, more so it would crush and hide the historic structure. We have had several historical homes turned into thriving businesses such as "The Mission" on 13th street and Half Door Brewing on 9th street; without losing the essence and integrity of these beautiful historic buildings.

San Diego has been labeled one of the top five most unaffordable cities to live in. The U.S. Department of Housing and Urban Development (HUD) defines "affordable" as housing that costs no more than 30 percent of

a household's monthly income. The average salary for a family of 4 in San Diego is just around \$64,000 gross. That equates to an affordable rent of no more than \$1,500.00 for a family. Who is going to keep these buildings accountable to ensure the rent stays affordable after they take advantage of these affordable housing incentives and are built? **Only 6 units out of 48 have been designated for low-income single occupancy.**

I am hoping that as public officials representing our community's best interest you will consider the impact of this proposed "Ezabelle" project will have. There is a need for housing in San Diego, especially affordable housing but "Ezabelle" micro-luxury studio project on this small plot that will desecrate the historic property is not the way to go about it. Most jobs in San Diego are not located downtown and people must commute to their employment by car. I hope that you will take into account the issues and the negative impact this project will have on our community.

Respectfully,

Michelle Brower, RN

To Appointed Officials reviewing the Ezebelle Project,

My fiancé and I live in East Village and are proud owners at Park Boulevard East. We see great potential the East Village community but this community still has a long way to go. I currently work as a Project Engineer for one San Diego's largest aerospace companies, and my fiancé works at a well know medical center in La Jolla. We spend a good portion of our income in the East Village area and hope to see it prosper. What I see with the development of the Ezebelle Project is a rushed idea, pitched for approval, and is geared for maximizing initial return, but lacks long term sustainment, and ignores the overall benefit to the community. The developers have provided no constructive communication with East Village community and its residence. The developer seems to have reached out to approving officials in East Village except the people who will be most affected, Park Boulevard East which houses over 40 residential units and surrounding blocks. The entrance to Ezabelle is in the back, basically in our courtyard, which greatly concerns the residents of Park Boulevard East for security as well as proper emergency personnel access.

The 864 square-foot house on the Ezabelle site was built in 1881 and qualifies as a local landmark that is an example of Italianate style from early development in East Village. Such landmark should be preserved and cherished as one of the few San Diego icons in the community. Instead the developer is looking to pancake stack an 8 story development on top of a historical building, which is in no way is tasteful. Currently this historic wright house is dilapidating further with development plans to use one room as a trash receptacle. An alternative solution for this site would be to restore the historical building into a profitable business. Example Queenstown Public house which is a super successful restaurant in Little Italy.

There is an importance in balancing the community, neighborhoods flourish when there's a healthy mix of life, businesses, work, and play development. The addition of Ezabelle is not contributing to the healthy balance, instead is tipping the balance further to an already dense area of low income housing and lack of parking. Micro-apartments for this development are sized at 211 to 348 square feet, which equivalent to living in your 14x15 ft bedroom. Hardly livable space for one individual with lack of full appliances, and basic needs such as in unit showers and bathrooms. Ezebelle Micro-apartment sizes exuberate temporary housing, high turnover rates, lack of community pride and ownership. The Studios 435 across the street are completing a "Luxory" micro apartment upgrade with 202 sq-ft going for \$1,975 per month and 355 sq-ft going for \$2,175 per month. I don't see Ezebelle providing sustainable low income housing if that's what is advertised, but instead adopting a similar more profitable model similar to Studios 435.

Low Income Housing, Ezebelle is not an ideal location:

- Ezebelle Project is 48 unit complex but only 6 units will be low income, which is less than <13% geared towards affordable living!!! Hardly seems like a significant positive impact to affordable housing in San Diego. I do not think this is a good sales pitch for affordable housing in East Village.
- East village already contains almost 90% of the low income housing in downtown, so adding six more units is unnecessary. I support affordable housing and I strongly recommend developers to seek other areas in San Diego to balance the affordable housing development.
- Cost of groceries, and other basic needs in downtown are less affordable than many other places in San Diego. Makes little sense to provide low income housing in an area where whole sale goods and services are significantly higher. Logically this seems like argument to not build further low income housing in a not so affordable area.

Parking Considerations to the Community:

- The city block where project is proposed is to be located is already heavily impacted by 86 new micro-apartment units located on 13th St, The Studios 435 will begin renting to the public in the next few months with NO PARKING. The cumulative effect of un-parked 134 new market rate units in a single block will be significant.

- The availability of utilizing our parking structure is seasonal and sporadic due to events at Petco Park. Monthly parking in the area is on the order of \$250 per month and not guaranteed. The low cost housing apartment units in the East Village neighborhood presently make up over 34% of all apartments.
- Statistically speaking <6% of households in San Diego are actually operate without car ownership (governing.com/gov-data). Statistical certainty that 94% of Ezebelle residence would add additional vehicles with no resident or guest parking.
- Current approved high rise apartments in East Village the future for affordable parking is going to become a rising issue. San Francisco has a parking issues with cost ranging from \$300 to \$500 monthly, I don't think we want to see this level of impact to our city.

Top Concerns from East Village Community

- There are a number of issues that concern the East Village community, and I challenge you our elected officials, project planners, developers, local authorities, to evaluate the location of proposed by Ezebelle and ask yourself how does approving this project provide support improving current issues that are ongoing and unresolved in East Village?
- Absolutely #1 the Homeless issue. This is a huge issue affecting community safety, health with the Hepatitis outbreak, tourism, real estate valuation, and can be contributed to the cause of failing businesses.
- Crime, out of 125 San Diego communities, East Village ranks number one for incidences of violent crimes (according to SDNew.com), within the past year totaling accounts of; 506 Arrest, 409 Assaults, 396 Thefts, 143 Burglary, and 110 Vandalisms.
- Failing businesses (Bottega Americano, Halycon, Stella House, Tilted Kilt, Jefferson School of Law, Primos, several more.....)

Real Estate Impact

- East Village comprises 40 percent of Downtown real estate. People view real estate in East Village as potential financial growth and prospect for a thriving community. Ezebelle is NOT contributing to a sustainable solution creating more micro-apartments with no parking.
- This project has the potential to impact real estate negatively in the area, and drive overall valuation down, which directly impacts state property taxes assessment.
- In the event real estate drops due to poor project planning there are a number ways residents can address the tax code including seeking/ordering appeals to the current property tax assessment, seeking appraisals, filing review requests, etc.

As part of the growing East Village community I strongly recommend further review of the Ezebelle Project at a more community involved level and consider alternate solutions for the historic house. While I support further development in East Village, after evaluating the developers proposal I strongly believe that the Ezebelle Project is less than ideal development for this location and would better suited in another location.

Respectfully,



Jeremiah Farinella
16 May 2018

JPFarinella@gmail.com
760.845.5594

Liz Foster
1225 Island Ave, Unit 208
San Diego, CA 92101
May 15th, 2018

To Appointed Officials Reviewing the Ezabelle Project,

My name is Liz Foster, I'm a civil engineer, construction project manager and proud community member of East Village. What initially drew me to the East Village community was the revitalization of a community in the heart of beautiful San Diego that was rising in a promising direction. In speaking with neighbors and community members, I am astounded at the history of our neighborhood and how far it has come over the past decade. The growth and turnaround has been the product of informed and thoughtful decisions that align with the collective goals of East Village and the City of San Diego. I write you today out of concern for the new proposed Ezabelle development located at 454 13th Street.

As a commercial construction project manager for over 10 years, it is easy to say I have deep seeded passion for buildings and the beauty and prosperity they can bring to a city and community. On my block alone, there are multiple buildings that I adore: The home and office of notable San Diego architect Rob Quigley (416 13th St), Sheldon Residence (1245 Island Ave) and the Wright House (454 13th Street). Each building is unique in it's own way and brings culture and character to the block and to East Village. These housing icons range from modern industrial to Queen Anne Victorian to Italianate architecture. When I first saw the renderings for the proposed Ezabelle project, my heart sank and a shook my head in disbelief. My gut interpretation was the overwhelming feeling of a historical landmark with great potential being devastated, dominated and crushed. This proposed 8-story monstrosity of a building does not celebrate or embrace the home's historical past and architectural beauty, but makes it a sad pedestal for the foot of the building above. A well-thought-out development that genuinely wants to improve the visibility and livelihood of a historical home can be achieved. There are numerous alternatives that can achieve preserving the building's character and making it a successful impact to the surrounding community. For example, the Mission (on our same block) and Queenstown Public (Little Italy) are successful local restaurants that embrace their building's original structure and design. Even the next block over on J Street, the Alexan project is another example of a project that has tastefully restored the small building on the adjacent property. The design of the Ezabelle project reflects the rushed design to help push a ROI without consideration of the 1881 landmark in its path.

In addition to the design and character concerns, the neighborhood continues to live in the struggle for parking from the ever-growing number of new apartment buildings and lack of sufficient parking structures and designated spots. This concern only intensifies during year-round Petco events nearby. With the Ezabelle development, there is NO PARKING provided for the 48 new units created. In addition, the newly renovated Studios 435 project is nearing completion and this same block is already preparing to absorb the influx of new tenants from 86 units that also have NO PARKING. Combined, 134 units will be added to the block with no provisions for parking other than straining the already stressed parking availability.

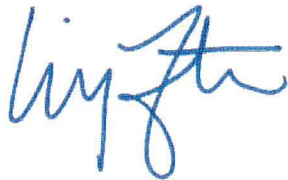
I also understand Ezabelle is being labeled as a positive for the community for providing 6 affordable housing units. In the growing concern for the homeless and low-income families in our city, I do not agree that 6 single occupant 211sf studio apartments will effectively aid or impact the

community needs. A development, whether on this block or elsewhere, can have a greater influence with 2-3 bedroom floorplans to accommodate families in need of stabilization in a low-income home. A single person dwelling will only increase the likelihood of quick turnover tenants that are not invested in the culture or prosperity of the East Village community. In addition, with the recent additions to the neighborhood (Pinnacle 1, Pinnacle 2, Alexan, Shift, etc.) the cost of rent and the cost of the surrounding services are increasing on an already higher-than-average San Diego cost of living. I am a supporter of affordable housing, but this does not seem to be the ideal placement for low-income tenants to optimally thrive.

As a member of the East Village community, myself and my neighbors are always aware of the alarming levels of homelessness, drugs and crime in the community. Just last Monday night, there was a multi-victim shooting at the corner of 15th St and Island (less than 2 blocks from the proposed development) that was reported to be gang related. This was one of the most eye-opening and impactful crimes that has happened so closely to my home in recent years. The stretch of 16th and 17th streets, along with the temporary camps on the sidewalks and parks, is a sad and disturbing reality of our community that each citizen should strive to guide in a positive direction.

As trusted appointed officials, planners and local authorities representing and shepherding our community towards our collective goals, I sincerely ask you if this development design intent and location is truly for the sustainable growth, benefit and support of our neighborhood and neighbors. The Ezabelle project is not our only option. Your decision to not approve this development will send a strong message that future proposed buildings and/or businesses will need to consider the wellbeing of our community. Furthermore, only solutions and ideas that can not only align with the goals of East Village, but also help it thrive, will be approved and implemented. Thank you for your valuable time and commitment to our community.

Respectfully,

A handwritten signature in blue ink, appearing to read "Liz Foster", with a stylized, cursive script.

Liz Foster



Save Our Heritage Organisation

Saving San Diego's Past for the Future

Monday, July 9, 2018

City of San Diego
Planning Commission
202 C Street
San Diego, CA 92101

Re: 454 13th Street, East Village

Planning Commission Members,

The Board of Directors' for Save Our Heritage Organisation (SOHO) voted to support the project at 454 Thirteenth Street at their May 11, 2018 meeting, which includes the historic resource known as the Wright House. The SOHO Board approved a prior iteration of this project, which is largely consistent with the current illustration, and includes approximately 10 feet between the roof of the historic resource and the new development, recedes the second floor behind the historic resource, and utilizes glass on the second floor front and side facades to set the resource apart.

The SOHO Board appreciates that Nakhshab Development & Design recognized the historical significance of this resource and first sought historical designation for the Wright House. The SOHO Board also acknowledges that this solution retains the historic resource on site, which conveys the fabric and grain of the original built environment, and maintains the resource as a separate building from the new development.

Thank you for the opportunity to comment,

Bruce Coons
Executive Director
Save Our Heritage Organisation

REHABILITATION TREATMENT PLAN

DATE: May 23, 2018

PROJECT: Move off site:
454 13th Street
City historic resource # 1278
San Diego, Ca. 92101
Assessors Parcel# 535-156-08-00

Temp. Storage facility / move-on/off site:
1141 E Street
San Diego, CA 92101

Move on site:
454 13th Street
San Diego, Ca. 92101
Assessors Parcel# 535-156-08-00

PROJECT TEAM:

D: Developer: NDD (Nakshab Development & Design)
PA: Project Architect: NDD
HA: Historic Architect: NDD
HAM: Historic Architect Monitor: John Eisenhart, Union Architecture
PI: Principal Investigator: Law Office of Marie Burke Lia. Marie Burke Lia Attorney
CM: Construction Manager: NDD
HM: House Mover: Joe Hansen, John T. Hansen Enterprises
BI: Building Inspector: City of San Diego Development Services: Environmental and Historical staff.
RE: Resident Engineer: NDD

PROPERTY DESCRIPTION:

The structure at 454 13th Street (John and Mary Wright House) is a historically designated single story example of an Italianate Style residence. Building date is 1882. The main structure is of rectangular form 32'-3" x 24'-2" and has a flat roof with projecting cornice (containing wood gutter), wood brackets, cornice, frieze on perimeter at roof wall junction. The building has two prominent bays on the east façade, the main entry porch on the northeast corner, has a wood shingled mansard roof (with cornice and wood dentils), supported by a round wood column (tuscan style). Exterior materials consist of 1x redwood "flush joint" tongue and groove siding (4 1/8" exposure, painted), one over one wood double hung windows, wood casing and trim.

An addition on the west side of the historic building, containing a kitchen, bathrooms and bedroom, is non-historic (1942).

A wood deck and railing extending the original entry area and steps on east side and a wood deck and steps off of the non-historic addition on the west side are non-original.

A 7 story apartment building with penthouse and basement will be constructed at the site at 454 13th Street. To facilitate this development the resource has to be temporarily removed from the site. Once the shell of the new development is completed the resource is to be returned to the site. The new location of the resource will be approximately 4'-0" south and 17'-0" east from it's original location on the same lot. It will be incorporated into the street level commercial space of the new development and rehabilitated at this new location in accordance with the U.S. Secretary of Interior's Standards Treatment Plan.

INTRODUCTION:

This Treatment Plan is being prepared to dismantle and temporarily remove the historic portion of the historic building from its current location at 454 13th Street (Assessors Parcel# 535-156-08-00). The resource is to be moved and stored safely at a warehouse at 1141 E Street, San Diego, CA 92101 while construction for a new development on the original site is undertaken. Approximate moving distance is 1 mile.

The implementation of the Treatment Plan for the relocation and transportation of 454 13th Street structure will be facilitated by a qualified historic House Mover under the observation of the Project Architect (PA) and Historic Architect Monitor (HAM) in a manner consistent with the mitigation, monitoring, and reporting program for this project.

The drawings outline proposed general stabilization and preparation of the structure for relocation. Including demolition of the westerly non-historic addition, and aforementioned non-original decks / steps.

The House Mover (HM) is responsible for detailing exact stabilization, disassembly, bracing and stabilization of pieces etc. to assure safe move of resource. Project Architect (PA) and Resident Engineer (RE) to be responsible for detailing exact stabilization, bracing, disassembly etc. to assure safety of resource. HAM to review.

This Treatment Plan is accompanied by a copy of HABS drawings of the property prepared by the (HAM).

This Treatment Plan and its related drawings will be included in all subsequent plans for the discretionary permit processing and construction documents.

PREPARATION / RELOCATION OF STRUCTURE:

1. Preparation of the resource prior to move:

The 1882 original structure is to be partially disassembled to be transported and stored in sections. The entire structure is to be stabilized, braced, and secured, individual building sections are to be stabilized, braced and secured. Structural framing members at non-visible areas may be braced with sheathing / blocking, additional framing etc. as required.

Fenestration (doors and window sashes) to be removed, frames and casings to remain in place. Fenestration openings to be secured. Use the City of San Diego standards for securing fenestration openings. Exterior plumbing vent, supply and waste pipes, electrical boxes and conduits shall be removed. All utilities to be disconnected.

Specific procedures to be determined by qualified historic House Mover, Project Architect and Resident Engineer and to be reviewed by HAM. Monitor to be notified prior to modification of structure not outlined in Treatment Plan. Consistent with Standards # 6,7, 9 and 10.

The 4x4 beams and wood columns below the existing 2x6 floor joists maybe removed. The perimeter foundation is not a significant feature and may be removed as required also. Any redwood exterior siding found on the west façade during demolition of the 1942 appendix should be left in salvaged.

Brace entire structure. Exterior siding or trim pieces affected by this shall be removed prior to damage. These pieces are to be stored and refastened during rehabilitation.

2. Demolition / removal of non-historic additions:

Prior to the start of the demolition / removal process. The Contractor and Monitor will meet on site to review the scope of demolition / removal work.

Non-historic addition and decks shall be clearly marked, and adjacent historic areas shall be protected from accidental demolition impact damage approved by monitor prior to demolition. Provide protective barriers (plywood, wood studs, red tape etc. – any attachment to historic fabric with as minimal nailing as possible) at corners of the resource, at any detailing and over windows. Contractor and Monitor to review on site.

The Treatment plan drawings will show location of the areas to be demolished and loaction of historic structure to remain.

3. Partial disassembly of historic structure:

Prior to the start of any disassembly work. The Contractor and Monitor will meet on site to review the scope of work. All parts of the resource to be disassembled shall be clearly marked and recorded prior and during disassembly; by PA, RE, HA and Historic House Mover to be reviewed by HAM.

Dismantling should be minimized as much as possible to preserve integrity of the resource: Per Treatment Plan the historic structure shall be dismantled into approximately five pieces. Mansard roof and porch shall be braced and tranported as an assembly. The eastern façade panel containing the (2) bays will be divided in (2) wall segments. Each bay will be braced in place and remain part of their pertaining wall panel.

At the eastern and western façade the ceiling and floor joists (running north – south direction) will be cut at the sill / top plate. Along the southern and northern façade the floor and ceiling joists abutting the façade will ermain in place and help stabilize. Each wall segment will be detached at each corner.

Damage to the flush wood siging shall be minimized by using a thin kerf blade for the vertical saw cuts. Removal of flush wood siding is not recommended. Damage is expected due to age of wood, specific type of siding (flush) and type of nails.

- a. Exterior wall assemblies north and south façade: Wood siding, interior and exterior window casing and trim, wood studs to remain in place. Interior lath and plaster on walls and ceilings shall be removed. The perimeter walls are to be secured (from wall sill plate up to wall top plate at parapet) from the interior side with ½” plywood sheathing across

the faces of the existing exposed studs. 4x8 Wood strong-backs 4'-0" o.c. are to be secured horizontally to the interior face of each wall segment attached to the existing stud framing with ¼" diameter, 8" length lag bolts (to be reviewed by RE). Existing cornices are to be braced and protected in place as required in order to remain intact / connected with their wall segment. Each segment is to be labeled.

The ceiling and floor joists (running north/south direction) will be cut at the sill / top plate of each wall segment. Additionally, each wall segment will have to be detached at each corner (nails pulled from stud connection and round corner trim should be left attached to one of the two segments this edge should be protected in place). PA, RE, HA and Historic House Mover, to be reviewed by HAM.

- b. Exterior wall assembly of east façade: Bays, Wood siding, interior and exterior window casing and trim, wood studs to remain in place. The perimeter walls are to be secured (from wall sill plate up to wall top plate at parapet) from the interior side with ½" plywood sheathing across the faces of the existing exposed studs. 4x8 Wood strong-backs 4'-0" o.c. are to be secured horizontally to the interior face of each wall segment attached to the existing stud framing with ¼" diameter, 8" length lag bolts (to be reviewed by RE). Existing cornices and existing roofing at each bay are to be braced and protected in place as required in order to remain intact / connected with perimeter walls of the bay. Each segment is to be labeled. The ceiling and floor joists (running north / south direction) abutting the wall segment shall be left in place, they will aid in stabilization of the wall segment. Additionally, each wall segment will have to be detached at each corner (nails pulled from stud connection and round corner trim should be left attached to one of the two segments this edge should be protected in place).
- c. Parapet assemblies on north, east, south and west: Frieze board / cornice, parapet bracing / brackets, wood gutter shall remain whole with their pertaining wall panel. Verify existing connections. Parapet pieces shall be stabilized and braced with additional ½" plywood and wood studs as necessary. PA, RE, HA and Historic House Mover, to be reviewed by HAM.
- d. East façade bays: Each bay should be stabilized and braced, as part of their pertaining wall segment (see 3b.). PA, RE, HA and Historic House Mover, to be reviewed by HAM.
- e. Entry porch accessory structure on north-east side of main structure to be stabilized and braced, to be moved as one whole assembly including roof. Vertical cut line to be determined by PA, RE, HA and Historic House Mover, to be reviewed by HAM.
- f. Round corner trims at siding corners: Care should be taken as to not damage the round corner trims at building corners. They should either remain in place attached to one of the two façade panels, or if not feasible carefully removed, catalogued. PA, RE, HA and Historic House Mover, to be reviewed by HAM.
- g. Floor: The existing floor and framing will be demolished during dissassembly of the resource. Old growth wood members should be salvaged. Methods of separating horizontal framing members from walls (cut locations) to be determined by PA, RE, HA and Historic House Mover, to be reviewed by HAM. Floor framing members to stay intact and help with bracing at eastern bays and at entry porch.
- h. Roof: Roof and ceiling at eastern bays and at entry porch to remain intact. The existing main ceiling / roof and framing will be demolished during dissassembly of the resource. Old growth wood framing members shall be salvaged. Projecting parapet to stay intact. PA, RE, HA and Historic House Mover, to be reviewed by HAM.

Dissassembly work and subsequent transport shall occur without any time delay.

At end of each work day, or as required, all parts to be protected from weather and vandalism.

During demolition / removal and disassembly work, Construction Manager to inform Monitor of discovery of any architectural elements on site (these may include brackets, posts, casings, doors, leaded windows, exterior siding on interior walls (ie. west wall) etc.. Monitor to evaluate relevance of such materials and discuss any change to treatment plan and construction documents that might better interpret the historical significance of the residence. Consistent with Standards # 2, 6, 7, and 9.

4. Movement and storage of resource:

The resource will be moved to a warehouse located at 1141 E Street San Diego, CA 92101. Each section of the resource will be protected and transported to this secure, climate controlled warehouse. Each individual piece shall be catalogued / labeled. Once the shell construction of the new development is completed each section of the resource will return to the site for reassembly and rehabilitation.

The location of the residence at the move-on site will be approximately 4'-0" south and 17'-0" east of the original location. The present height finish floor to grade is approximately 18". The new height of the finish first floor will be at approximately 12" above grade, resource will integrate with new development at the first floor.

Reassembly of the resource will occur at the new site, any temporary bracing will be removed and any required rehabilitation of the structure will commence. Since the original entry porch deck and steps are non-surviving a new entry porch wood deck and steps, sympathetic to Italianate era, will be constructed at the new location per Secretary of the Interior's Standards of Rehabilitation, to be reviewed by HAM. Consistent with Standards # 1, 2, 9, 10.

5. House Mover / disassembly and reassembly of resource:

1. Prior to cutting or dismantling panels a structural engineer needs to provide a letter of acceptance for the method employed by the contractor. A letter of acceptance from the engineer should review and accept the method for cutting, moving the panels will work in accordance with the Treatment Plan (historic resource not to be damaged). Monitor (HAM) to observe method employed by contractor on site with structural engineer and project architect (PA) present.
2. Each panel is to be marked on the plywood side with the number provided on Treatment Plan, if any field changes occur, additional numbers need to be added and shall be noted on the Treatment Plan. In addition, each panel shall have an envelope securely taped, containing the follow: A. historic name and resource #., B. the elevation and floor plan of the panel in relation to the entire building, C. the name, address, phone number, email address of the project architect, general contractor who dismantled the panels, historic monitor, city historic planner, and owner and finally D. the date it was disassembled from the original location.

House Mover to outline path of move, sequence of move, and means in which disassembled pieces are to be secured for the move. Monitor and City Staff to approve plan prior to moving date.

Generally, the movement of the historic resource shall be done slowly and on a path that is smooth and graded. If damage occurs to the resource during the move the monitor will be notified immediately. Consistent with Standards # 1, 2.

EXISTING FOUNDATION:

The residence consists of areas with brick perimeter wall foundation (1882, brick size 8 ¼"x 3 7/8" x 2 5/8"), isolated concrete and wood pier footings with 4x4 or 2x4 columns supporting 4x4 beam (1882). Floor joists (1882) are 2x6's @ 24" o.c. and rest on top of 4x4 beams and 2x sill plate at perimeter wall. Floor sheathing is original 1x4 wood plank in western portion of the residence (not verified under non-original oak floor in eastern part of residence). The existing 2x sill plate at the perimeter wall shall remain as part of each individual wall panel. Existing foundation, floor framing, flooring will be removed in their entirety. Consistent with Standards #9 and 10.

NEW FOUNDATION:

The new development will include a basement, the resource is to be located on the ground floor concrete slab – elevation +/- 12" above grade (original finish floor level is approx. 18" above grade). Work at move-on site new development shall be sufficiently completed to prior to move-off of resource. Consistent with Standards # 9 and 10.

EXISTING FRAMING:

Horizontal members:

First floor framing is non-original 2 ¼" width oak finish flooring over 2x6 floor joists (1882). It could not be verified if original subfloor wood plank is still existing in this area. Original 1x4 subfloor on 2x6 floor joists at 24" o.c. in carpeted areas.

Roof framing consists of 2x4 roof rafters at 24" o.c. with 1x10 wood roof sheathing board, ceiling framing consists of 2x4 ceiling joists at 16" o.c..

This will be removed and cut as required to detach wall panels.

Vertical members:

Exterior wall framing is 2x4 wood studs at 32" o.c. with intermediate 1x4 members. 1x horizontal redwood "flush joint" tongue and groove siding (4 1/8" exposure) with wood round corner trims. All existing perimeter wood stud framing, siding and trim is to remain intact. Each individual wall panel will be rehabilitated and reinstalled, plywood backing will be carefully removed and new interior wall finish will be installed. Any additional structural work necessary at walls to be concealed from exterior view.

Interior wall framing consists of 2x4 wood studs at 32" o.c. with intermediate 1x4 members. This will be demolished.

Consistent with Standards # 2, 9 and 10.

ROOF:

Main roof: The main roof (1882 structure) is a flat roof, roofing material is sheet roll roofing. This will be removed, roof framing members will be cut from walls once walls are braced and ready for transport (see existing roof framing above). Repair and restore cornice, bracing and frieze: The approx. 1'-4" horizontal roof projections (cornice, brackets) on the north, east and south shall remain intact, roof projection / cornice and brackets along west façade shall be salvaged to be used as needed during rehabilitation work.

Porch roof: The porch north and west side has a wood shingle mansard roof. No evidence of other roofing material was discovered. Entire porch roof / wall assembly to remain as one piece. Mansard wood roof shingles shall be restored, if any new wood shingles are installed, the exist. shingles will serve as a template. Consistent with Standards # 6, 9 and 10.

EXTERIOR WALL FINISHES:

The existing 1x horizontal redwood “flush joint” tongue and groove siding (4 1/8” exposure) to remain in place on exterior walls.

If siding board or trim has minor cracks, repair with wood epoxy filler. If the entire board or trim is damaged or missing, an existing board taken from a non-visible area shall replace it in likeness and kind. If this is not possible, a new board or trim of the same profile and species may be used as a replacement (west façade). If a section of siding or trim is damaged or missing a “Dutchman” type repair should be performed. Wood fenestration casings (head, jamb, sill and apron) are wood and will remain and be repaired as necessary. Missing pieces shall be replicated existing profile serves as template, match species.

Existing will serve as a template for the restoration at the in-filled window opening on the south façade.

Consistent with Standards # 2, 6, 7, 9, and 10.

EXTERIOR DOORS AND WINDOWS:

Windows are wood, double hung type. The frames are wood and should be kept in place.

Window sashes to be removed along with hardware and safely stored (remove, mark and store dead weights for each window, mark and store any hardware that needs to be dismantled).

Repair, clean and paint. Reinstall for smooth operation.

If a feature of the sash or frame is missing or deteriorated beyond repair (Monitor to determine condition) a replicated profile of the same wood species as the missing element shall be used.

Repair of window units shall use epoxy resin type putty to infill missing profiles. If the sash and fixed units are a new unit, they should match the profile of the existing original rail and style.

Both options (repair or replication) would be consistent with the standards, repair is generally the preferred option.

An original window opening has been in-filled on the south façade, this shall be restored, the original windows will serve as a template. Original door openings on the interior appear to have been modified in height. No original doors have been found to remain. Transom window at main entrance to be restored in likeness and kind, original door is missing a new wood door sympathetic to italianate style should be installed, HAM to review proposed. The existing original window sashes shall be marked for location taken from on plan by PA. The fenestration will be reinstalled and be repaired for smooth operation. If any new wood windows, the original windows will serve as a template.

Refer to Preservation Brief # 9 for repair of windows. Consistent with Standards # 2, 6, 7, 9, 10.

MAIN ENTRY PORCH:

The main entry porch is to remain, it is preferred it is used as the main entry area in its new location. The porch deck material has been altered, the original steps are missing. The original porch area is about 18” above grade. At move-on site it will be at approx. 12” above grade. The original porch bead board ceiling, column and low wall along porch north side should remain in place and be repaired. Since the original porch floor material and steps no longer exist a new a new porch floor and steps should be constructed consistent with the Secretary of the Interior’s Standards for rehabilitation. Historic Monitor to review Project / Historic Architect design.

Consistent with Standards # 6, 9 and 10.

FIREPLACE:

The fireplace was installed at a later date. An original window opening was in-filled on the south façade. The fireplace and interior chimney shall be removed and the window opening restored, see *Exterior Windows and Doors*. Consistent with Standards # 6.

ELECTRICAL & LIGHTING:

The existing electrical and lighting system will be upgraded to conform to current code. Electrical meter shall be located discretely away from view. Exterior lighting fixtures to be surface mounted or pendant type sympathetic to Italianate Style. Per Historic Building Code, lighting fixtures that replicate the Italianate Style may be incandescent. Incandescent lighting should be used throughout the historic residence. Consistent with Standards # 9 and 10.

PLUMBING:

All exterior plumbing and vent pipe to be dismantled. New interior plumbing and vents to be installed as required. Vent pipes to avoid being visible from principal elevation or near the edge of roof. Areas in exterior siding where old pipes have been removed to be repaired with salvaged siding from building. The plumbing system should be upgraded to conform to current code. Consistent with Standards # 9 and 10.

PAINTING:

Remove existing paint, dirt, mildew from exterior wall, fenestration and fenestration casing. Lead abatement should be acknowledged with these finishes. Existing materials to be tested for lead paint and if detected, follow current laws for careful removal and disposal. Proper sand, repair, finish shall be enforced (Contractor to be CDPH LRC-certified, lead paint may be sanded with EPA approved sanders with full unit HEPA certified vacuums, by Festool brand or equal: <http://hepa.festool.us/hepa-vacuums/EPA-RRP-Certified-HEPA-Vacuum/>). Paint scheme on the exterior of the building, at fenestration, fenestration casing should be in period colors / color scheme (2-4 colors recommended). PA to select, HAM to review. Monitor and City Staff to approve final paint scheme. Refer to Preservation Brief #10. Consistent with Standards #6 and 7.

REPAIR:

The cleaning of all historic material/fabric shall occur through using the gentlest means possible. An appropriate means of control and disposal of lead, asbestos or other chemicals shall be provided. Historic fabric shall be retained as much as possible. Do not sandblast or water power wash materials. Minor wood repair shall use Abatron Epox fill. If wood is damaged to a greater extent, a dutchman type repair shall be performed. Refer to Preservation Brief #1.

REHABILITATION CHARACTER DEFINING FEATURES:

The overall character defining features of the resource are two prominent bay forms on the east elevation, flat roof with projecting cornice at the roof wall junction, dental frieze and brackets, a mansard roof over the entry porch area supported by wood column.

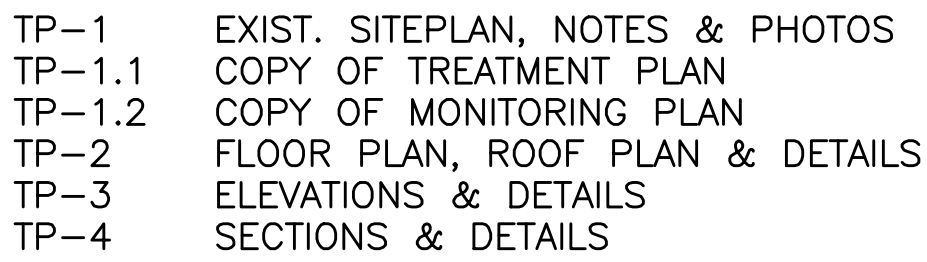
The character defining material elements are: Painted redwood horizontal "flat joint" tongue and groove siding (4 1/8" exposure) with round wood trim finished corners, wood one over one double hung windows, wood casing and trim, tuscan type wood column.

Should damage occur to the resource, it shall be repaired in conformance with the Secretary of the Interior's Standards for Rehabilitation or Reconstruction. Consistent with Standards #2, 6, 9, and 10.

ATTACHMENTS: T

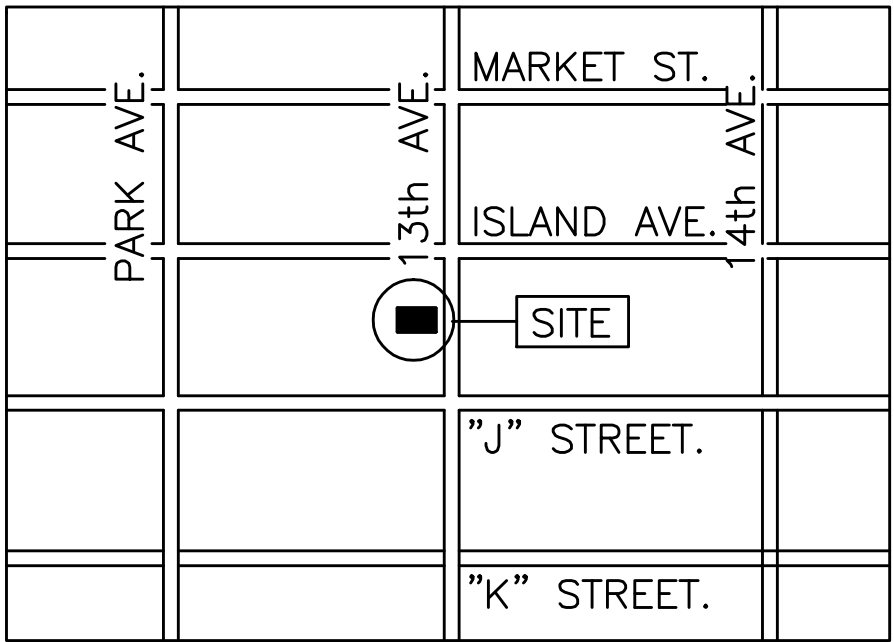
reatment Drawings, HABS Documents.

ERRECTED IN 1882, PERIOD OF SIGNIFICANCE 1882



DESCRIPTION OF RESOURCE.

THE JOHN AND MARY WRIGHT RESIDENCE WAS BUILT IN 1882. IT IS A HISTORICAL DESIGNATED RESOURCE UNDER CRITERION "C" AS A GOOD REPRESENTATION OF ITALIANATE STYLE ARCHITECTURE. THE CHARACTER DEFINING FEATURES OF THE RESIDENCE INCLUDE TWO PROMINENT BAY FORMS AT EAST ELEVATION, TYPICAL BRACKETS, DENTIL FRIEZE AND CORNICE AT ROOF / WALL JUNCTION, MANSARD ROOF OVER PORCH ENTRY AREA, ONE OVER ONE DOUBLE HUNG WINDOWS AND FLUSH WOOD TONGUE AND GROOVE SIDING.



NO SCALE



TP-1



TP-1

LEGEND

NOTES

A. MATERIALS OR CONSTRUCTION FROM PERIOD OF SIGNIFICANCE LABELLED "1882" U.N.O.

B. NON--PERIOD OF SIGNIFICANCE MATERIALS ARE NOT LABELLED

1	CONCRETE DRIVE	8	WOOD DECK	16	WOOD D.H. WINDOW	24	FRIEZE PANEL 1882	32	WOOD CAPITAL 1882	40	2X6 FLOOR JOIST 1882	48	WOOD DOOR	56	ATTIC VENT	65	ROOF VENT
2	FENCE	9	WOOD RAILING	17	WOOD CASING /TRIM 1882	25	WOOD CORNICE 1882	33	WOOD DENTIL 1882	41	2X6 FLOOR JOIST	49	CARPET	57	WOOD STEPS	66	ELECTRIC METER
3	CONCRETE STREET CURB	10	CONCRETE STEPS	18	WOOD CASEMENT	26	WOOD GUTTER 1882	34	WOOD DENTIL	42	1X4 WOOD PLANK 1882	50	TILE	58	4'X8' SKYLIGHT	67	WOOD FRAMED UTIL. CHASE
4	BRICK PAVER	11	LANDSCAPE	19	VINYL SLIDER WINDOW	27	WOOD BRACKET 1882	35	WOOD BASEBOARD 1882	43	4X4 POST 1882	51	FIREPLACE	59	2'X2' SKYLIGHT	68	WOOD BEAM
5	WOOD SHED	12	1X VERTICAL WOOD BOARD 1882	20	PANEL DOOR	28	WOOD ROUND CORNER TRIM 1882 SEE DETAIL 5/ TP-3	36	OAK FLOORING 2 ¼" WIDTH	44	4X4 BEAM 1882	52	BUILT IN CABINET 1882	60	VINYL FLOORING	69	1X4 WOOD CORNER TRIM
6	CONCRETE RETAINING WALL	13	1X SIDING "FLUSH JOINT" 1882 SEE DETAIL 7 / TP-3	21	TRANSOM WINDOW 1882 SEE DETAIL 5 /TP-2	29	WOOD ROUND CAP 1882 SEE DETAIL 5 / TP-3	37	2X4 CEILING JOIST 1882	45	1X10 WOOD SHEATHING BOARD 1882 TYP. WALL 2X4 @32"O.C. WITH INTERMEDIATE 1X4 MEMBER	53	BOOKSHELVES	61	ENGINEERED WOOD FLOOR	70	1X6 BEAD BOARD CEILING WITH MIDPOINT BEAD. SEE 9 /TP-3
7	BRICK FOUNDATION 1882 8 ¼" X 3 ⅞" X 2 ⅝"	14	WOOD SHINGLE ROOF 1882 SEE 6 /TP-3	22	1X SKIRT BOARD 1882	30	WOOD PLINTH 1882	38	2X4 ROOF RAFTER 1882	46		54	WOOD SHIPLAP SIDING	62	WOOD FASCIA RAFTER	71	2X4 STUD WALL 16" O.C.
		15	WOOD D.H. WINDOW 1882 SEE DETAIL 3 /TP-2	23	1X SKIRT BOARD	31	WOOD COLUMN 1882. SEE DETAIL 9/TP-3	39	WOOD LATH / PLASTER 1882	47	WOOD FRENCH DOOR	55	WOOD SIDING	64	ROOF SCUPPER		

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TELEPHONE: 619.269.4941 / WWW.UNIONARCH.COM

PROJECT: JOHN AND MARY WRIGHT HOUSE, 454 13TH AVE.
CITY OF SAN DIEGO HISTORIC RESOURCE SITE #1278,
BUILT 1882.

CLIENT: NAKHSHAB DESIGN DEVELOPMENT
340 15TH STREET, SAN DIEGO, CA 92101

TREATMENT PLAN FOR JOHN AND MARY WRIGHT RESIDENCE – CITY OF SAN DIEGO HISTORIC RESOURCE #1278

ERRECTED IN 1882, PERIOD OF SIGNIFICANCE 1882

dead weights for each window, mark and store any hardware that needs to be dismantled). Repair, clean and paint. Reinstall for smooth operation. An original window opening has been in-filled on the south façade, this shall be restored, the original windows will serve as a template. Original door openings on the interior appear to have been modified in height. No original doors have been found to remain. Transom window at main entrance to be restored in likeness and kind, original door is missing a new wood door sympathetic to Italianate style should be installed, HAM to review proposed. The existing original window sashes shall be marked for location taken from on plan by PA. The fenestration will be reinstalled and be repaired for smooth operation. If any new wood windows, the original windows will serve as a template. Refer to Preservation Brief # 9 for repair of windows. Consistent with Standards # 2, 6, 7, 9, 10.

MAIN ENTRY PORCH:

The main entry porch is to remain, it is preferred it is used as the main entry area in its new location. The porch deck material has been altered, the original steps are missing. The original porch area is about 18" above grade. At move-on site it will be at grade level. The original porch bead board ceiling, column and low wall along porch north side should remain in place and be repaired. Consistent with Standards # 6, 9 and 10.

FIREPLACE:

The fireplace was installed at a later date. An original window opening was in-filled on the south façade. The fireplace and interior chimney shall be removed and the window opening restored, see *Exterior Windows and Doors*. Consistent with Standards # 6.

ELECTRICAL & LIGHTING:

The existing electrical and lighting system will be upgraded to conform to current code. Electrical meter shall be located discretely away from view. Exterior lighting fixtures to be surface mounted or pendant type sympathetic to Italianate Style. Per Historic Building Code, lighting fixtures that replicate the Italianate Style may be incandescent. Incandescent lighting should be used throughout the historic residence. Consistent with Standards # 9 and 10.

PLUMBING:

All exterior plumbing and vent pipe to be dismantled. New interior plumbing and vents to be installed as required. Vent pipes to avoid being visible from principal elevation or near the edge of roof. Areas in exterior siding where old pipes have been removed to be repaired with salvaged siding from building. The plumbing system should be upgraded to conform to current code. Consistent with Standards # 9 and 10.

PAINTING:

Remove existing paint, dirt, mildew from fenestration and fenestration casing. Paint scheme on the exterior of the building, at fenestration, fenestration casing should be in period colors / color scheme (2-4 colors recommended). PA to select, HAM to review. Existing materials to be tested for lead paint and if detected, follow current laws for careful removal and disposal. Monitor and City Staff to approve final paint scheme. Refer to Preservation Brief # 10. Consistent with Standards # 6.and 7.

REPAIR:

The cleaning of all historic material/fabric shall occur through using the gentlest means possible. An appropriate means of control and disposal of lead, asbestos or other chemicals shall be provided. Historic fabric shall be retained as much as possible. Do not sandblast or water

7 OF 8

power wash materials. Minor wood repair shall use **Abatron Epox fill**. If wood is damaged to a greater extent, a dutchman type repiar shall be performed. Refer to Preservation Brief # 1.

REHABILITATION CHARACTER DEFINING FEATURES:

The overall character defining features of the resource are two prominent bay forms on the east elevation, flat roof with projecting cornice at the roof wall junction, dental frieze and brackets, a mansard roof over the entry porch area supported by wood column.

The character defining material elements are: Painted redwood horizontal "flat joint" tongue and groove siding (4 1/8" exposure) with round wood trim finished corners, wood one over one double hung windows, wood casing and trim, tuscan type wood column.

Should damage occur to the resource, it shall be repaired in conformance with the Secretary of the Interior's Standards for Rehabilitation or Reconstruction. Consistent with Standards # 2, 6, 9, and 10.

ATTACHMENTS:

Treatment Drawings, HABS Documents.

8 OF 8

The location of the residence at the move-on site will be approximately 4'-0" south and 17'-0" east of the original location. The present height finish floor to grade is approximately 18". The new height of the finish first floor will be at grade level. resource will integrate with new development at the first floor slab on grade. Reassembly will occur at the new site, any temporary bracing will be removed and any required rehabilitation of the structure will commence. Consistent with Standards # 1, 2, 9, 10.

5. House Mover / disassembly and reassembly of resource:

- Prior to cutting or dismantling panels a structural engineer needs to provide a letter of acceptance for the method employed by the contractor. A letter of acceptance from the engineer should review and accept the method for cutting, moving the panels will work in accordance with the Treatment Plan (historic resource not to be damaged). Monitor (HAM) to observe method employed by contractor on site with structural engineer and project architect (PA) present.
- Each panel is to be marked on the plywood side with the number provided on Treatment Plan, if any field changes occur, additional numbers need to be added and shall be noted on the Treatment Plan. In addition, each panel shall have an envelope securely taped, containing the follow: A. historic name and resource #., B. the elevation and floor plan of the panel in relation to the entire building, C. the name, address, phone number, email address of the project architect, general contractor who dismantled the panels, historic monitor, city historic planner, and owner and finally D. the date it was disassembled from the original location.

House Mover to outline path of move, sequence of move, and means in which disassembled pieces are to be secured for the move. Monitor and City Staff to approve plan prior to moving date. Generally, the movement of the historic resource shall be done slowly and on a path that is smooth and graded. If damage occurs to the resource during the move the monitor will be notified immediately. Consistent with Standards # 1, 2.

EXISTING FOUNDATION:

The residence consists of areas with brick perimeter wall foundation (1882, brick size 8 1/4"x 3 7/8" x 2 5/8"), isolated concrete and wood pier footings with 4x4 or 2x4 columns supporting 4x4 beam (1882). Floor joists (1882) are 2x6's @ 24"o.c. and rest on top of 4x4 beams and 2x sill plate at perimeter wall. Floor sheathing is original 1x4 wood plank in western portion of the residence (not verified under non-original oak floor in eastern part of residence). The existing 2x sill plate at the perimeter wall shall remain as part of each individual wall panel. Existing foundation, floor framing, flooring will be removed in their entirety. Consistent with Standards #9 and 10.

NEW FOUNDATION:

The new development will include a basement, the resource is to be located on the ground floor concrete slab – elevation 0'-0" (original finish floor level is approx. 18" above grade). Work at move-on site new development shall be sufficiently completed to prior to move-off of resource. Consistent with Standards # 9 and 10.

EXISTING FRAMING:

Horizontal members: First floor framing is non-original 2 1/4" width oak finish flooring over 2x6 floor joists (1882). It could not be verified if original subfloor wood plank is still existing in this area. Original 1x4 subfloor on 2x6 floor joists at 24" o.c. in carpeted areas. Roof framing consists of 2x4 roof rafters at 24" o.c. with 1x10 wood roof sheathing board, ceiling framing consists of 2x4 ceiling joists at 16" o.c. This will be removed and cut as required to detach wall panels.

Vertical members: Exterior wall framing is 2x4 wood studs at 32" o.c. with intermediate 1x4 members. 1x horizontal redwood "flush joint" tongue and groove siding (4 1/8" exposure) with wood round corner trims. All existing perimeter wood stud framing, siding and trim is to remain intact. Each individual wall panel will be rehabilitated and reinstalled, plywood backing will be carefully removed and new interior wall finish will be installed. Any additional structural work necessary at walls to be concealed from exterior view.

Interior wall framing consists of 2x4 wood studs at 32" o.c. with intermediate 1x4 members. This will be demolished.

Consistent with Standards # 2, 9 and 10.

ROOF:

Main roof: The main roof (1882 strucutre) is a flat roof, roofing material is sheet roll roofing. This will be removed, roof framing members will be cut from walls once walls are braced and ready for transport (see existing roof framing above). Repair and restore cornice, bracing and frieze: The approx. 1'-4" horizontal roof projections (cornice, brackets) on the north, east and south shall remain intact, roof projection / cornice and brackets along west façade shall be salvaged to be used as needed during rehabilitation work.

Porch roof: The porch north and west side has a wood shingle mansard roof. No evidence of other roofing material was discovered. Entire porch roof / wall assembly to remain as one piece. Mansard wood roof shingles shall be restored, if any new wood shingles are installed, the exist. shingles will serve as a template.

Consistent with Standards # 6, 9 and 10.

EXTERIOR WALL FINISHES:

The existing 1x horizontal redwood "flush joint" tngue and groove siding (4 1/8" exposure) to remain in place on exterior walls. If siding board has minor cracks, repair with wood epoxy filler. If the entire board is damaged or missing, an existing board taken from a non-visible area shall replace it likeness in kind. If this is not possible, a new board of the same profile and species may be used as a replacement (west façade). Wood fenestration casings (head, jamb, sill and apron) are wood and to remain in place and be repaired. Existing will serve as a template for the restoration at the in-filled window opening on the south façade. Consistent with Standards # 2, 6, 7, 9, and 10.

EXTERIOR DOORS AND WINDOWS:

Windows are wood, double hung type. The frames are wood and should be kept in place. Window sashes to be removed along with hardware and safely stored (remove, mark and store

6 OF 8

Specific procedures to be determined by qualified historic House Mover, Project Architect and Resident Engineer and to be reviewed by HAM. Monitor to be notified prior to modification of structure not outlined in Treatment Plan. Consistent with Standards # 6, 7, 9 and 10.

The 4x4 beams and wood columns below the existing 2x6 floor joists maybe removed. The perimeter foundation is not a significant feature and may be removed as required also. Any redwood exterior siding found on the west façade during demolition of the 1942 appendix should be left in salvaged.

Brace entire structure. Exterior siding or trim pieces affected by this shall be removed prior to damage. These pieces are to be stored and refastened during rehabilitation.

2. Demolition / removal of non-historic additions:

Prior to the start of the demolition / removal process. The Contractor and Monitor will meet on site to review the scope of demolition / removal work.

Non-historic addition and decks shall be clearly marked and approved by monitor prior to demolition. The Treatment plan drawings will show location of the areas to be demolished and loaction of historic structure to remain.

The historic resource shall be protected as the work on the areas to be removed is undertaken.

3. Partial disassembly of historic structure:

Prior to the start of any disassembly work. The Contractor and Monitor will meet on site to review the scope of work. All parts of the resource to be disassembled shall be clearly marked and recorded prior and during disassembly and shall be reviewed by HAM.

Dismantling should be minimized as much as possible to preserve integrity of the resource: Per Treatment Plan the historic structure shall be dismantled into approximately five pieces. Mansard roof and porch as well as each bay shall be braced and tranported as an assembly.

Largest workable pieces and major components to be determined by PA, RE, HA and Historic House Mover to be reviewed by HAM.

- Exterior wall assemblies north and south façade:** Wood siding, interior and exterior window casing and trim, wood studs to remain in place. Interior lath and plaster shall be removed. The perimeter walls are to be secured from the interior side with 1/2" plywood sheathing across the faces of the existing exposed studs. Two steel strong-backs are to be secured horizontally to the interior face of each wall segment attached to the existing stud framing, one at the top and one at the bottom of the wall segment (to be reviewed by RE). Existing cornices are to be braced and protected in place as required in order to remain intact / connected with their wall segment. Each segment is to be labeled. If entire length of one façade is too large for transport, methods of stabilization, bracing and vertical cut line to be determined by PA, RE, HA and Historic House Mover, to be reviewed by HAM.
- Exterior wall assembly of east façade:** Bays, Wood siding, interior and exterior window casing and trim, wood studs to remain in place. The perimeter walls are to be secured from the interior side with 1/2" plywood sheathing across the faces of the existing exposed studs. Two steel strong-backs are to be secured horizontally to the interior face of each

3 OF 8

- wall segment attached to the existing stud framing, one at the top and one at the bottom of the wall segment (to be reviewed by RE). Existing cornices and existing roofing at each bay are to be braced and protected in place as required in order to remain intact / connected with perimeter walls of the bay. Each segment is to be labeled. If entire length of one façade is too large for transport, methods of stabilization, bracing and vertical cut line to be determined by PA, RE, HA and Historic House Mover, to be reviewed by HAM. Parapet assemblies on north, east, south and west: Frieze board / cornice, parapet bracing / brackets, wood gutter shall remain whole. Parapet pieces shall be stabilized and braced. If not feasible to retain connection / assembly with vertical wall assembly below they may be removed in one piece from each façade (north, east, south, west). Methods of stabilisation and bracing and horizontal cut lines to be determined by PA, RE, HA and Historic House Mover, to be reviewed by HAM.
- East façade bays:** Each bay should be stabilized and braced, to be moved as one whole assembly including roof. Vertical cut line to be determined by PA, RE, HA and Historic House Mover, to be reviewed by HAM.
 - Entry porch accessory structure** on north-east side of main structure to be stabilized and braced, to be moved as one whole assembly including roof. Vertical cut line to be determined by PA, RE, HA and Historic House Mover, to be reviewed by HAM.
 - Round corner trims at siding corners:** Care should be taken as to not damage the round corner trims at building corners. They should either remain in place attached to one of the two façade panels, or if not feasible carefully removed, catalogued. To be determined by PA, RE, HA and Historic House Mover, to be reviewed by HAM.
 - Floor:** The existing floor and framing will be demolished during disassembly of the resource. Old growth wood members should be salvaged. Methods of separating horizontal framing members from walls (cut locations) to be determined by PA, RE, HA and Historic House Mover, to be reviewed by PA, RE, HA and Historic House Mover, to be reviewed by HAM.
 - Roof:** Roof and ceiling at eastern bays and at entry porch to remain intact. The existing main ceiling / roof and framing will be demolished during disassembly of the resource. Old growth wood framing members shall be salvaged. Methods of separating horizontal framing members from walls (cut locations) to be determined by PA, RE, HA and Historic House Mover, to be reviewed by HAM.

Disassmbley work and subsequent transport shall occur without any time delay. At end of each work day, or as required, all parts to be protected from weather and vandalism.

During demolition / removal and disassembly work, Construction Manager to inform Monitor of discovery of any architectural elements on site (these may include brackets, posts, casings, doors, leaded windows, exterior siding on interior walls (ie. west wall) etc.. Monitor to evaluate relevance of such materials and discuss any change to treatment plan and construction documents that might better interpret the historical significance of the residence. Consistent with Standards # 2, 6, 7, and 9.

4. Movement and storage of resource:

The resource will be moved to a warehouse located at 1141 E Street San Diego, CA 92101. Each section of the resource will be protected and transported to this secure, climate controlled warehouse. Each individual piece shall be catalogued / labeled. Once the shell construction of the new development is completed each section of the resource will return to the site for reassembly and rehabilitation.

4 OF 8

UNION ARCHITECTURE INC. 1530 BROOKES AVE. SAN DIEGO, CA. 92103 619-269-4941

REHABILITATION TREATMENT PLAN

DATE: April 20, 2018

PROJECT: Move off site: 454 13th Street City historic resource # 1278 San Diego, Ca. 92101 Assessors Parcel# 535-156-08-00

Temp. Storage facility / move-on/off site: 1141 E Street San Diego, CA 92101

Move on site: 454 13th Street San Diego, Ca. 92101 Assessors Parcel# 535-156-08-00

PROJECT TEAM:

D: Developer: NDD (Nakshab Development & Design)
PA: Project Architect: NDD
HA: Historic Architect: NDD
HAM: Historic Architect Monitor: John Eisenhart, Union Architecture
PI: Principal Investigator: Law Office of Marie Burke Lia. Marie Burke Lia Attorney
CM: Construction Manager: TBD.
HM: House Mover: TBD.
BI: Building Inspector: City of San Diego Development Services: Environmental and Historical staff.
RE: Resident Engineer: NDD

PROPERTY DESCRIPTION:

The structure at 454 13th Street (John and Mary Wright House) is a historically designated single story example of an Italianate Style residence. Building date is 1882. The main structure is of rectangular form 32'-3" x 24'-2" and has a flat roof roof with projecting cornice (containing wood gutter), wood brackets, cornice, frieze on perimeter at roof wall junction. The building has two prominent bays on the east façade, the main entry porch on the northeast corner, has a wood shingled mansard roof (with cornice and wood dentils), supported by a round wood column (tuscan style). Exterior materials consist of 1x redwood "flush joint" tongue and groove siding (4 1/8" exposure, painted), one over one wood double hung windows, wood casing and trim.

An addition on the west side of the historic building, containing a kitchen, bathrooms and bedroom, is non-historic (1942).

A wood deck and railing extending the original entry area and steps on east side and a wood deck and steps off of the non-historic addition on the west side are non-original.

1 OF 8

A 7 story apartment building with penthouse and basement will be constructed at the site at 454 13th Street. To facilitate this development the resource has to be temporarily removed from the site. Once the shell of the new development is completed the resource is to be returned to the site. The new location of the resource will be approximately 4'-0" south and 17'-0" east from it's original location on the same ot. It will be incorporated into the street level commercial space of the new development and rehabilitated at this new location in accordance with the U.S. Secretary of Interior's Standards Treatment Plan.

INTRODUCTION:

This Treatment Plan is being prepared to dismantle and temporarily remove the historic portion of the historic building from its current location at 454 13th Street (Assessors Parcel# 535-156-08-00). The resource is to be moved and stored safely at a warehouse at 1141 E Street, San Diego, CA 92101 while construction for a new development on the original site is undertaken. Approximate moving distance is 1 mile. The implementation of the Treatment Plan for the relocation and transportation of 454 13th Street structure will be facilitated by a qualified historic House Mover under the observation of the Project Architect (PA) and Historic Architect Monitor (HAM) in a manner consistent with the mitigation, monitoring, and reporting program for this project.

The drawings outline proposed general stabilization and preparation of the structure for relocation. Including demolition of the westerly non-historic addition, and aforementioned non-original decks / steps.

The House Mover (HM) is responsible for detailing exact stabilization, disassembly, bracing and stabilization of pieces etc. to assure safe move of resource. Project Architect (PA) and Resident Engineer (RE) to be responsible for detailing exact stabilization, bracing, disassembly etc. to assure safety of resource. HAM to review.

This Treatment Plan is accompanied by a copy of HABS drawings of the property prepared by the (HAM).

This Treatment Plan and its related drawings will be included in all subsequent plans for the discretionary permit processing and construction documents.

PREPARATION / RELOCATION OF STRUCTURE:

1. Preparation of the resource prior to move:

The 1882 original structure is to be partially disassembled to be transported and stored in sections. The entire structure is to be stabilized, braced, and secured, individual building sections are to be stabilized, braced and secured. Structural framing members at non-visible areas may be braced with sheathing / blocking, additional framing etc. as required.

Fenestration (doors and window sashes) to be removed, frames and casings to remain in place. Fenestration openings to be secured. Use the City of San Diego standards for securing fenestration openings. Exterior plumbing vent, supply and waste pipes, electrical boxes and conduits shall be removed. All utilities to be disconnected.

2 OF 8

PROJECT:

JOHN AND MARY WRIGHT HOUSE, 454 13TH AVE.
CITY OF SAN DIEGO HISTORIC RESOURCE SITE #1278,
BUILT 1882.

CLIENT:

NAKSHAB DESIGN DEVELOPMENT
340 15TH STREET, SAN DIEGO, CA 92101

ARCHITECT:

UNION ARCHITECTURE ,INC.

JOHN H. EISENHART, ARCHITECT
EVA L.J. THORN, INTERIORS

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DATE: 01.19.2018
REV: 04.20.2018

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SHEET 2 OF 6

TREATMENT PLAN FOR JOHN AND MARY WRIGHT RESIDENCE – CITY OF SAN DIEGO HISTORIC RESOURCE #1278

ERRECTED IN 1882, PERIOD OF SIGNIFICANCE 1882

6. Pre-construction meeting move-on site. (HAM, HA, PI, CM, BI, D)

Issue: Overview of Treatment Plan, Architectural, Landscaping and Engineering Documents as related to move-on site. Review work involved by CM to prepare site for arrival of structure.

7. New foundation, utilities, site preparation for move on (HAM, HA, CM, HM)

Issue: Review of work on site to assure work will properly receive move-on of resource.

Monitoring at Move-Off Site “B” Storage Facility at 1141 “E” Street to Move-On Site “A” at 454 13th Street.

8. Move-on site (HAM, HA, CM, BI).

Issue: Review move-on site with resource present. Overview of Treatment Plan for rehabilitation of resource, Architectural, Landscaping and Engineering Documents.

9. Move-on site as required by construction activity (HAM, HA, CM).

Issue: Review rehabilitation of resource in accordance with Treatment Plan and Architectural, Landscaping and Engineering Documents.

10. Final Monitoring (HAM, HA, CM, D).

Issue: Final punch list of items to complete according Treatment Plan and Architectural, Landscaping and Engineering Documents.

11. Draft Report (HAM, BI).

Issue: Draft report of monitor process to be submitted to BI for review.

12. Final Report (HAM, BI, PI, D).

Issue: Final report of monitoring process, submit to PI for distribution to City of San Diego Developmental Services Department, San Diego History Center for archiving.

3 OF 6

UNION ARCHITECTURE INC. 1530 BROOKES AVE. SAN DIEGO, CA. 92103 619-269-4941

MONITORING PLAN

DATE: April 20, 2018

PROJECT: Move off site:
454 13th Street
City historic resource # 1278
San Diego, Ca. 92101
Assessors Parcel# 535-156-08-00

Temp. Storage facility / move-on/off site:
1141 E Street
San Diego, CA 92101

Move on site:
454 13th Street
San Diego, Ca. 92101
Assessors Parcel# 535-156-08-00

PROJECT TEAM:

D: Developer: NDD (Nakshab Development & Design)
PA: Project Architect: NDD
HA: Historic Architect: NDD
HAM: Historic Architect Monitor: John Eisenhart, Union Architecture
PI: Principal Investigator: Law Office of Marie Burke Lia. Marie Burke Lia Attorney
CM: Construction Manager: TBD
HM: House Mover:TBD
BI: Building Inspector: City of San Diego Development Services: Environmental and Historical staff.
RE: Resident Engineer: NDD

PROPERTY DESCRIPTION:

The structure at 454 13th Street (John and Mary Wright House) is a historically designated single story example of an Italianate Style residence. Building date is 1882. The main structure is of rectangular form 32'-3" x 24'-2" and has a flat roof roof with projecting cornice (containing wood gutter), wood brackets, cornice, frieze on perimeter at roof wall junction. The building has two prominent bays on the east façade, the main entry porch on the northeast corner, has a wood shingled mansard roof (with cornice and wood dentils), supported by a round wood column (tuscan style). Exterior materials consist of 1x redwood "flush joint" tongue and groove siding (4 1/8" exposure, painted), one over one wood double hung windows, wood casing and trim.

An addition on the west side of the historic building, containing a kitchen, bathrooms and bedroom, is non-historic (1942).

A wood deck and railing extending the original entry area and steps on east side and a wood deck and steps off of the non-historic addition on the west side are non-original.

1 OF 6

A 7 story apartment building with penthouse and basement will be constructed at the site at 454 13th Street. To facilitate this development the resource has to be temporarily removed from the site. Once the shell of the new development is completed the resource is to be returned to the site. The new location of the resource will be approximately 4'-0" south and 17'-0" east from it's original location on the same lot, it will be incorporated into the street level commercial space of the new development.

This Treatment Plan is being prepared to dismantle and temporarily remove the historic portion of the building from its current location at 454 13th Street (Assessors Parcel# 535-156-08-00). The resource is to be moved to and stored safely at a warehouse at 1141 E Street, San Diego, CA 92101. Approximate moving distance is 1 mile each way.

Monitoring at Move-Off Site“A” : 454 13th Street City, San Diego, Ca. 92101, Assessors Parcel# 535-156-08-00, See area to be monitored figure 1 , 2 and 3 below.

1. Overview of Treatment Plan and Monitoring Plan (HAM, HA, PI, PA, CM, BI, D, HM).

Issue: Pre-construction meeting as related to historic resource on site. Discuss sequence and type of work to be done prior to move. General methods of protection of structure during demolition work of non-historic additions to be discussed.

2. Preparation of resource for moving (HAM, HA, CM).

Issue: Monitor to be present prior to any disassembly of structure. Location marks of cuts by HM to be determined, general method of disassembly and support to be discussed and approved by HAM per Treatment Plan.

3. Final review of preparation of resource for moving (HAM, HA, CM, HM).

Issue: Monitor to review after completion of the following work: Removal of exterior plumbing, electrical lines. Monitor to take inventory of wood shingles, braces, windows and doors to be salvaged per Treatment Plan. Bracing and protection of structure prior to move off date.

Per Treatment Plan the historic structure shall be dismantled into approximately five pieces. Mansard roof and porch as well as bays shall be braced as one piece. All pieces shall be labeled / catalogued. To be reviewed by HAM.

The historic resources will be moved to site "B" Storage Facility at 1141 "E" Street.

Monitoring at Move-Off Site “B” Storage Facility at 1141 “E” Street. See area to be monitored figure 4 below.

4. Move-off storage site (HAM,CM).

Issue: Review work involved by CM to brace and protect structure for storage duration.

5. Continuing monitoring of structures at storage facility (HAM).

Issue: Review protection of resource every 3 months or as required if damage occurs, issue report documenting the damage.

2 OF 6

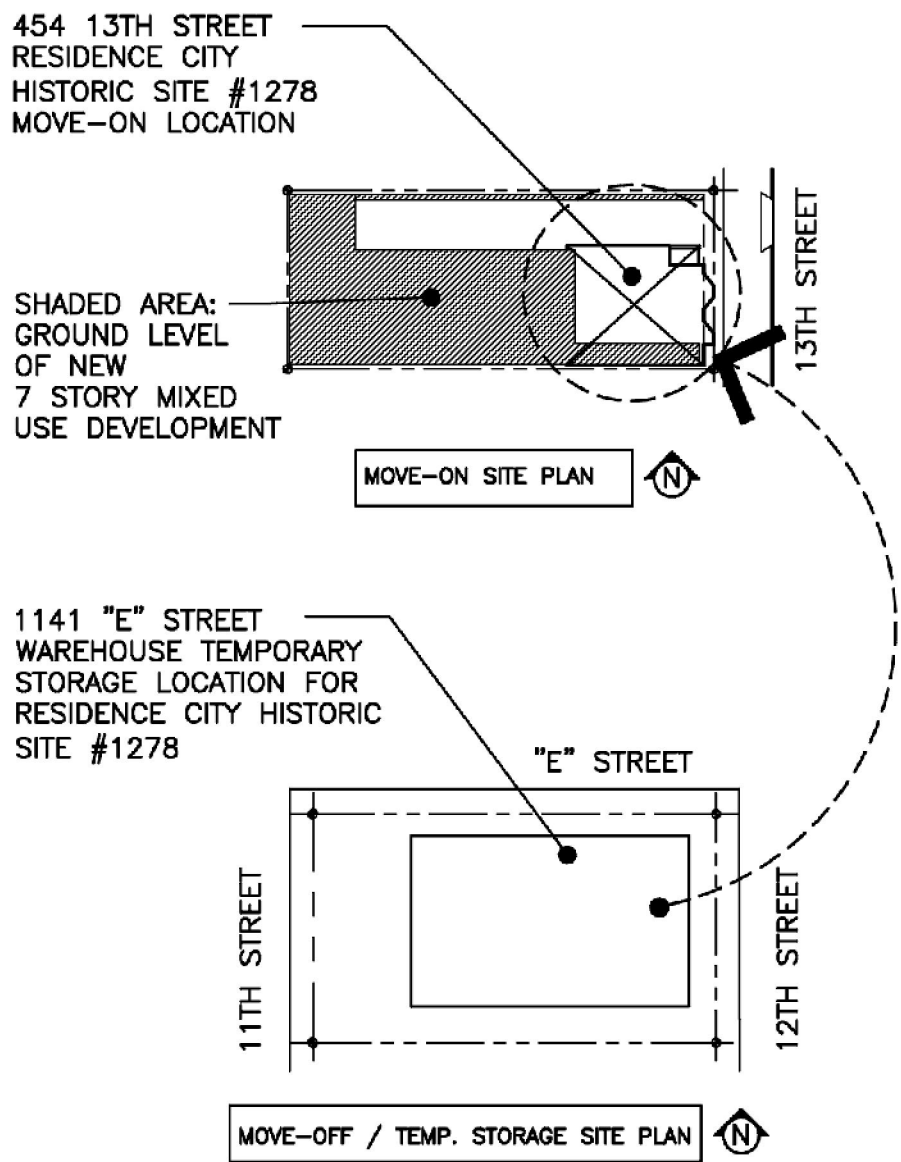


FIG 4.: Move-off site "B" at 1141 E Street, resource to be moved-off from temporary stoarge at warehouse. Final move-on site plan at 454 13th Street. Area shaded is new 7 story development.

6 OF 6

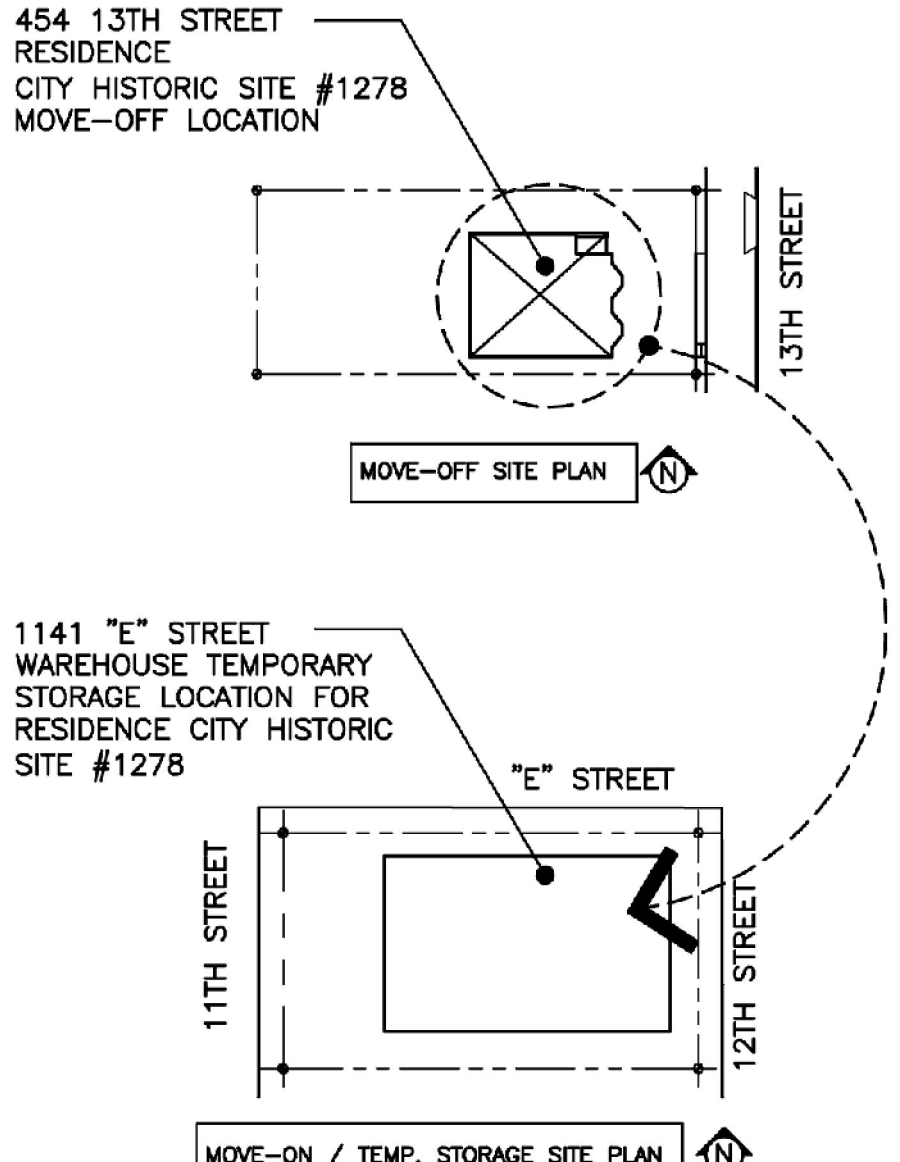


FIG 3.: Move-off site "A" at 454 13th Street. Resource to be moved-off from original site to tempo rary storage at warehouse. Temporary move-on site plan at 1141 E Street.

5 OF 6

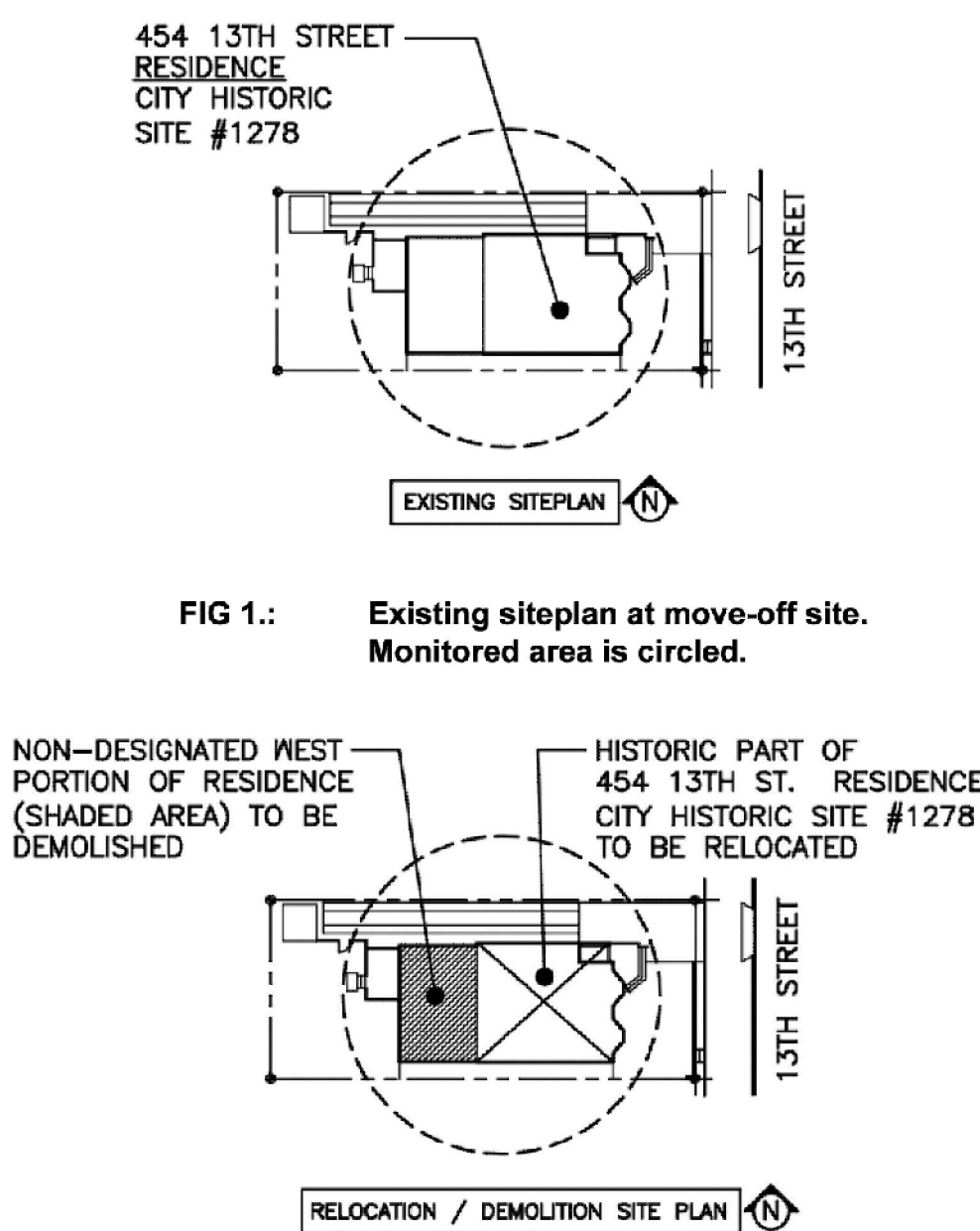


FIG 2.: Relocation / Demolition siteplan. Shaded area to be demolished.

4 OF 6

PROJECT:

JOHN AND MARY WRIGHT HOUSE, 454 13TH AVE.
CITY OF SAN DIEGO HISTORIC RESOURCE SITE #1278,
BUILT 1882.

CLIENT: NAKHSHAB DESIGN DEVELOPMENT

ARCHITECT:

UNION ARCHITECTURE , INC.

JOHN H. EISENHART, ARCHITECT
EVA L.J. THORN, INTERIORS

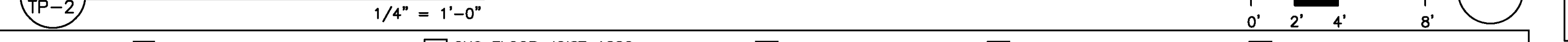
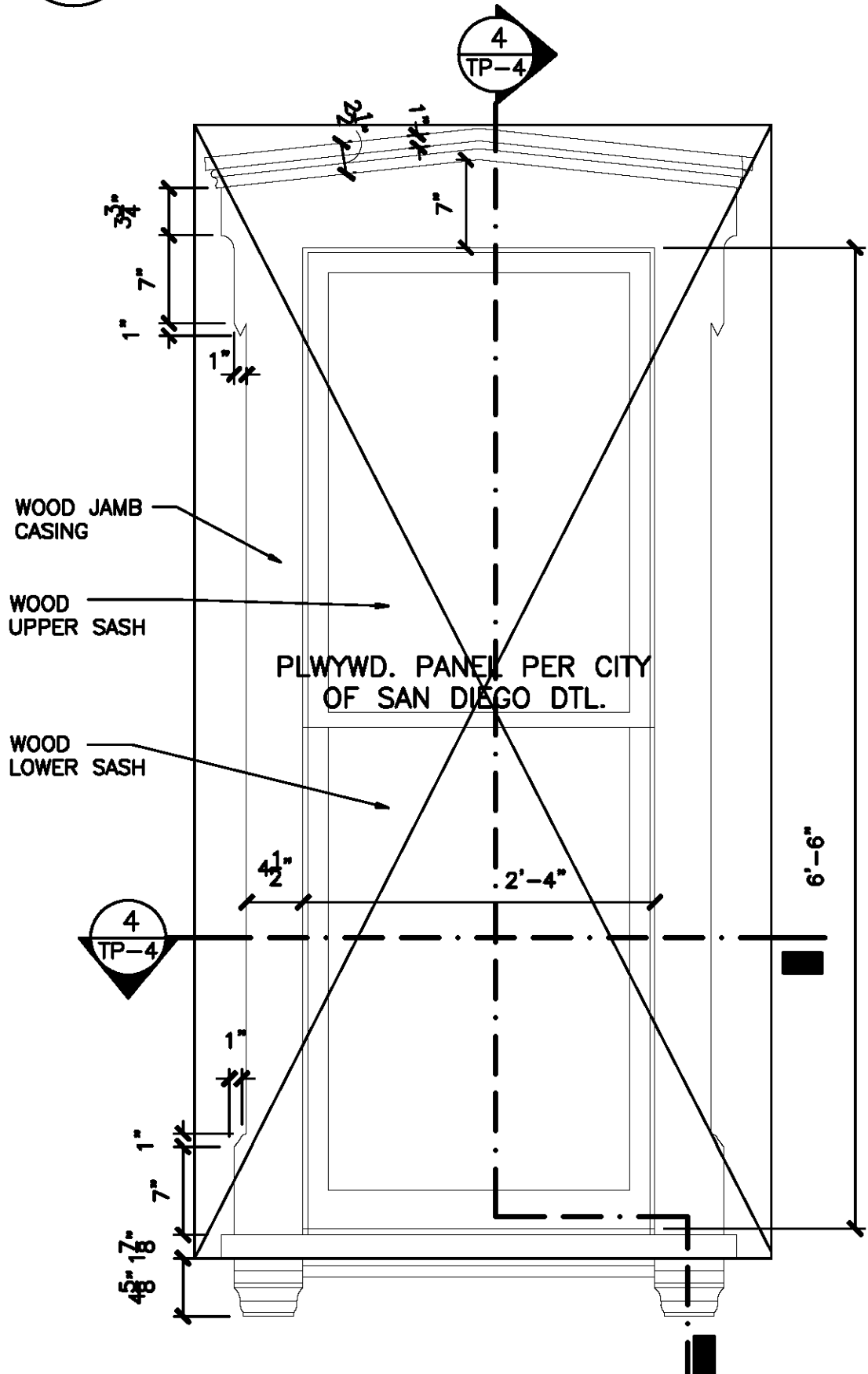
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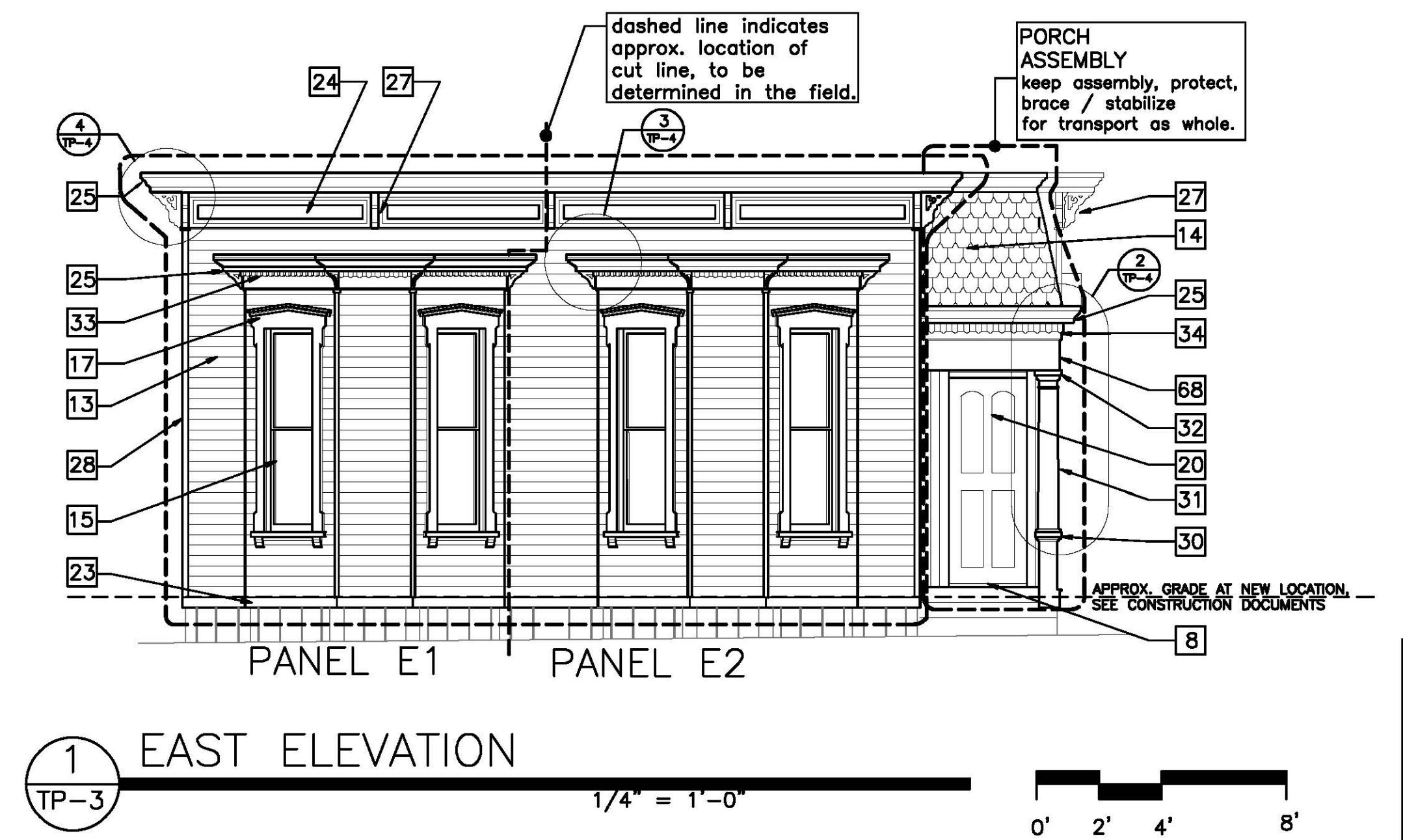
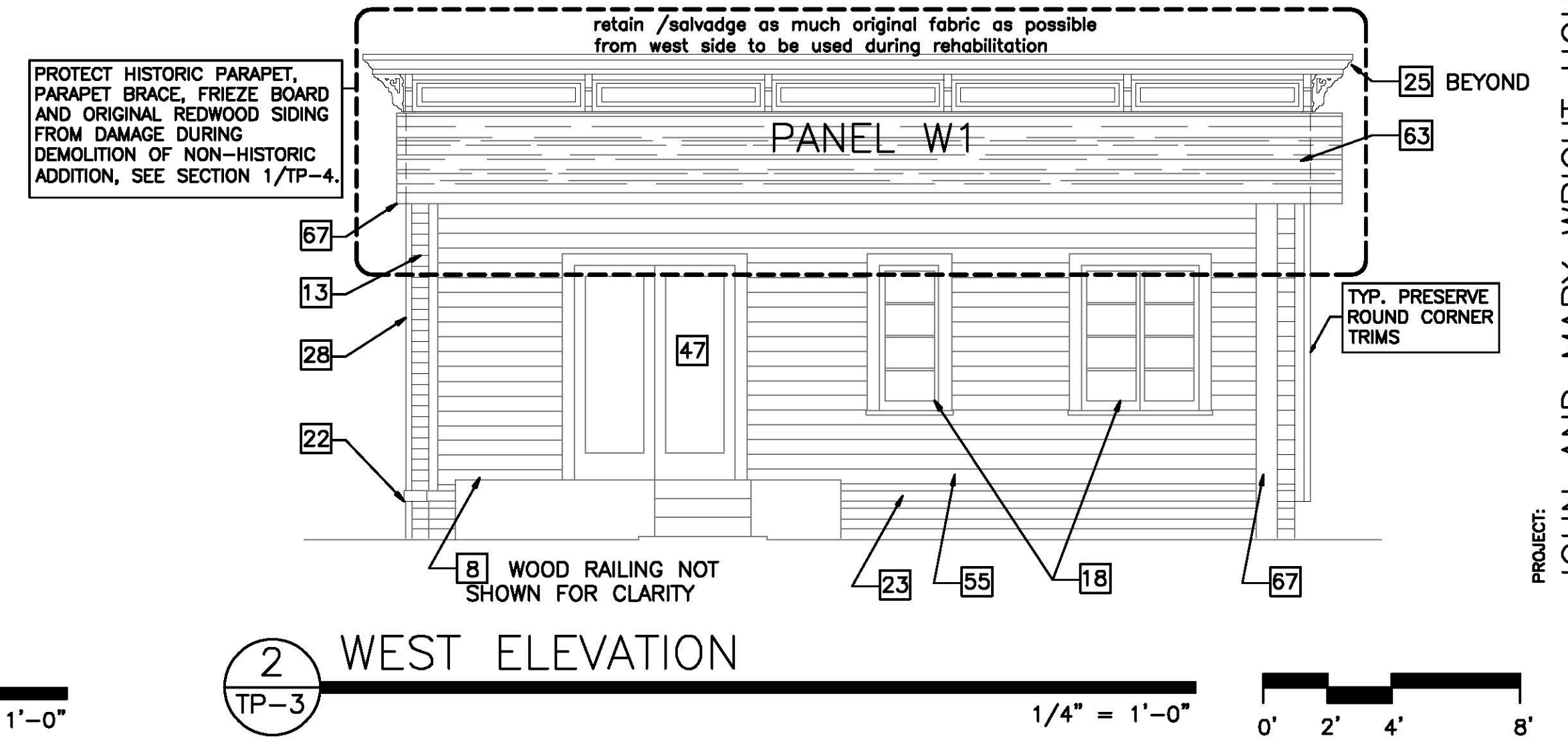
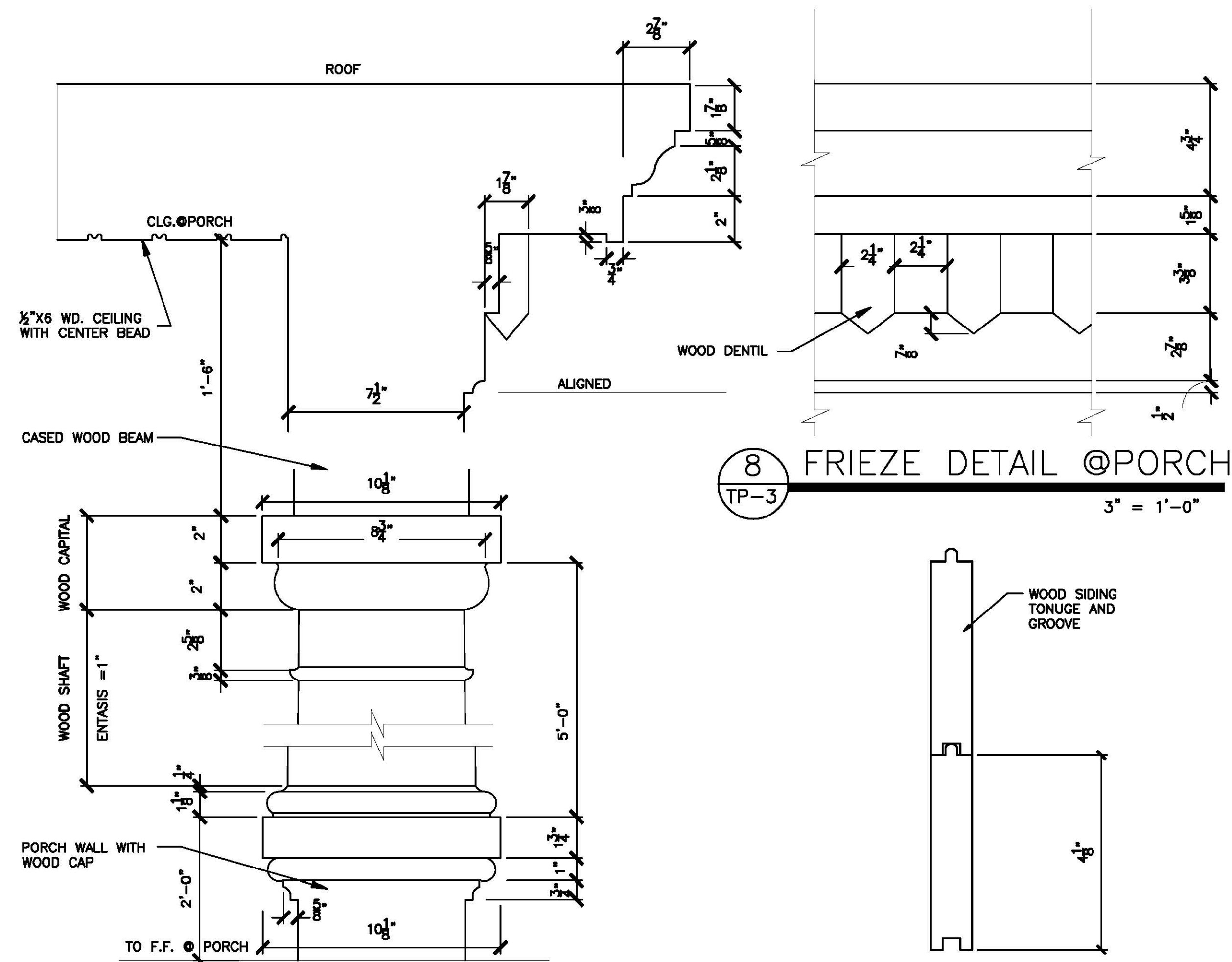
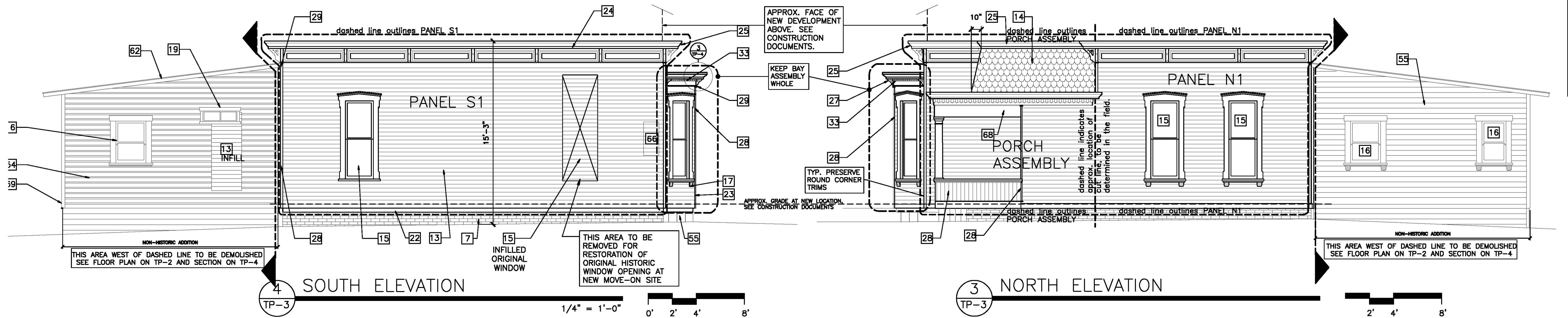
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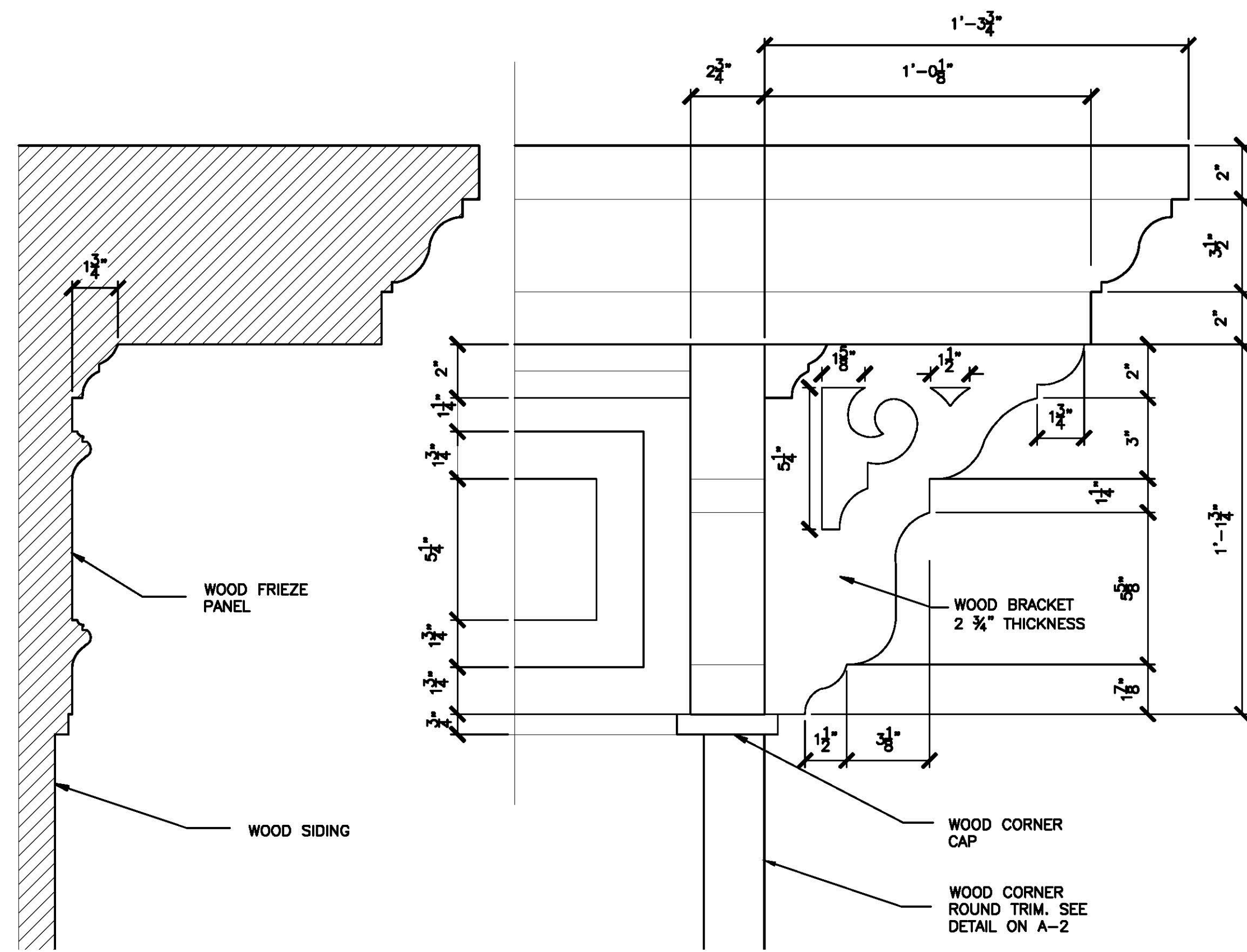
SHEET 3 OF 6



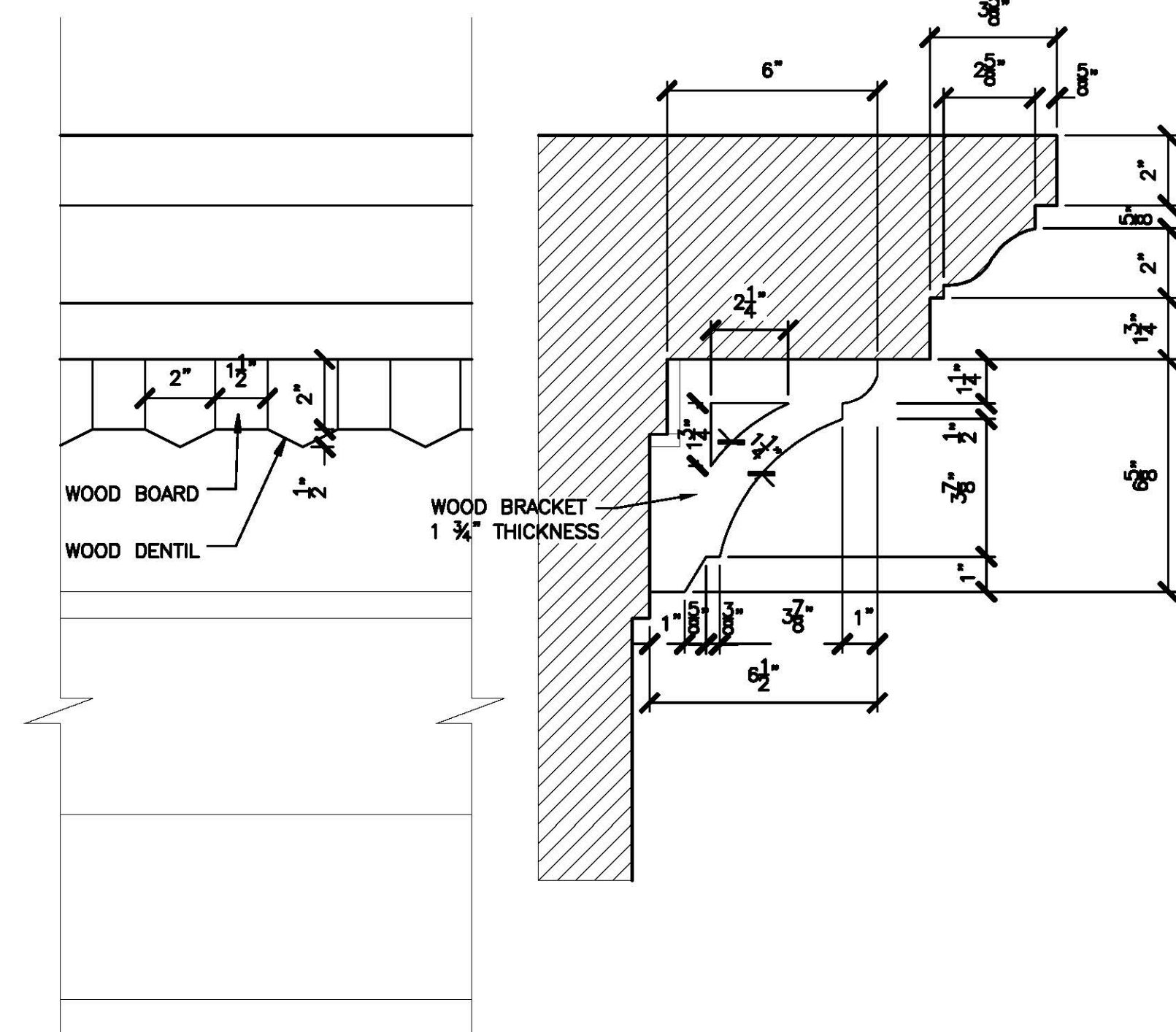
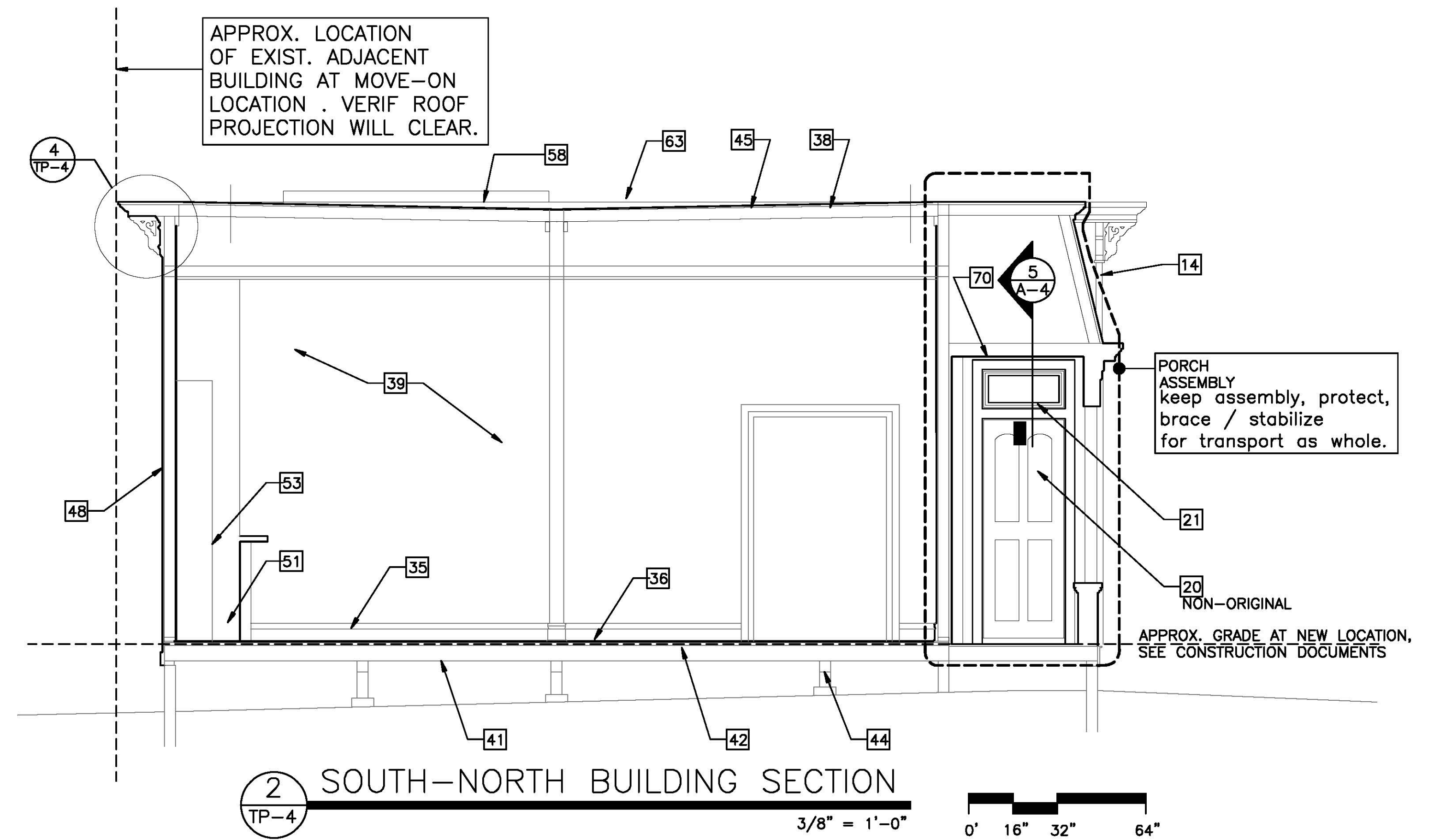
All rights reserved. No part of this drawing may be reproduced in any form without the written permission of Architect.	ARCHITECT: UNION ARCHITECTURE, INC. JOHN H. EISENHART, ARCHITECT EVA L.J. THORN, INTERIORS 1530 BROOKES AVENUE, SAN DIEGO, CALIFORNIA 92103 TELEPHONE: 619.269.4841 / WWW.UNIONARCH.COM	PROJECT: JOHN AND MARY WRIGHT HOUSE, 454 13TH AVE. CITY OF SAN DIEGO HISTORIC RESOURCE SITE #1278, BUILT 1882.
		CLIENT: NAKHSHAB DESIGN DEVELOPMENT 340 13TH STREET, SAN DIEGO, CA 92101
DATE: 01.19.2018 REV: 04.20.2018 TP-2		
SHEET 4 OF 6		



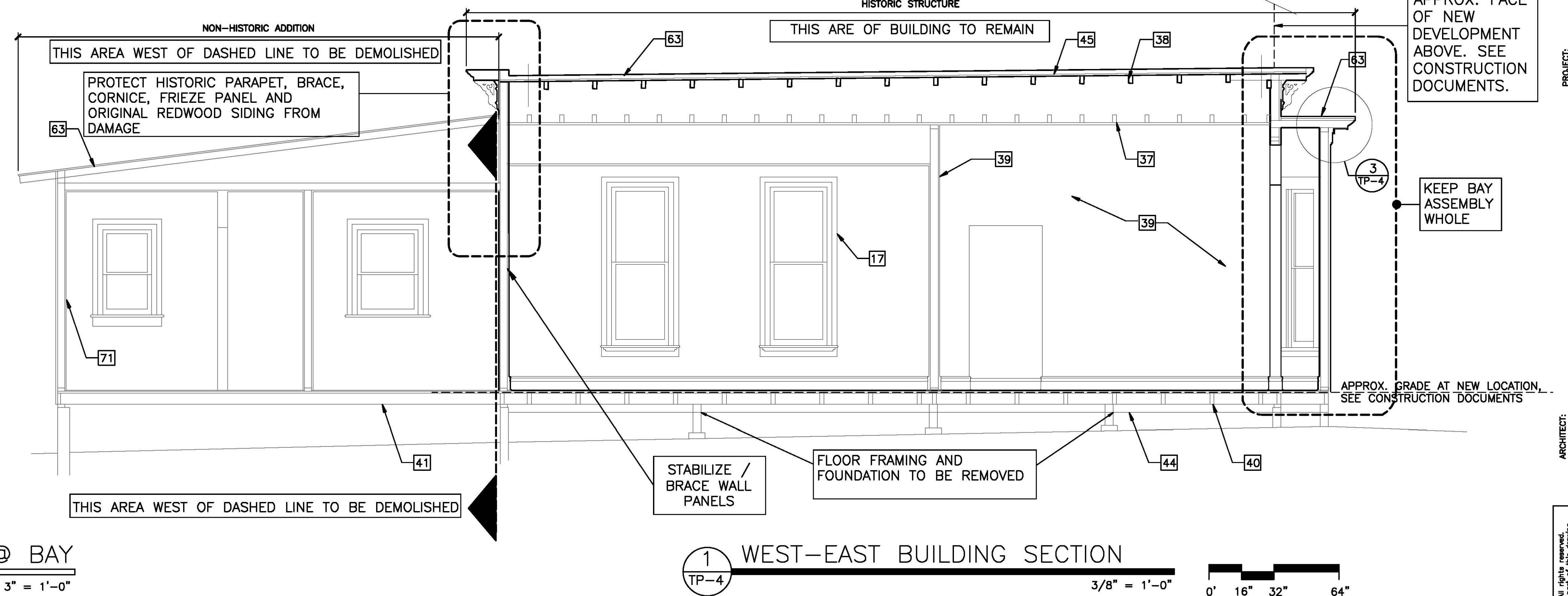
LEGEND			
NOTES			
A. MATERIALS OR CONSTRUCTION FROM PERIOD OF SIGNIFICANCE LABELLED "1882" U.N.O.			
B. NON-PERIOD OF SIGNIFICANCE MATERIALS ARE NOT LABELLED			
1 CONCRETE DRIVE	8 WOOD DECK	16 WOOD D.H. WINDOW	24 FRIEZE PANEL 1882
2 FENCE	9 WOOD RAILING	17 WOOD CASING /TRIM 1882	25 WOOD CORNICE 1882
3 CONCRETE STREET CURB	10 CONCRETE STEPS	18 WOOD CASEMENT	26 WOOD GUTTER 1882
4 BRICK PAVER	11 LANDSCAPE	19 VINYL SLIDER WINDOW	27 WOOD BRACKET 1882
5 WOOD SHED	12 1X VERTICAL WOOD BOARD 1882	20 PANEL DOOR	28 WOOD ROUND CORNER TRIM 1882
6 CONCRETE RETAINING WALL	13 1X SIDING "FLUSH JOINT" 1882	21 TRANSOM WINDOW 1882	29 WOOD ROUND CAP 1882 SEE DETAIL 5 / TP-3
	14 WOOD SHINGLE ROOF 1882	22 1X SKIRT BOARD 1882	30 WOOD PLINTH 1882
	15 WOOD D.H. WINDOW 1882	23 1X SKIRT BOARD	31 WOOD COLUMN 1882. SEE DETAIL 9/TP-3
			32 WOOD CAPITAL 1882
			33 WOOD DENTIL 1882
			34 WOOD DENTIL
			35 WOOD BASEBOARD 1882
			36 OAK FLOORING 2 1/4" WIDTH
			37 2X4 CEILING JOIST 1882
			38 2X4 ROOF RAFTER 1882
			39 WOOD LATH / PLASTER 1882
			40 2X6 FLOOR JOIST 1882
			41 2X6 FLOOR JOIST
			42 1X4 WOOD PLANK 1882
			43 4X4 POST 1882
			44 4X4 BEAM 1882
			45 1X10 WOOD SHEATHING BOARD 1882
			46 TYP. WALL 2X4 @32"O.C. WITH INTERMEDIATE 1X4 MEMBER
			47 WOOD FRENCH DOOR
			48 WOOD DOOR
			49 CARPET
			50 TILE
			51 FIREPLACE
			52 BUILT IN CABINET 1882
			53 BOOKSHELVES
			54 WOOD SHIPLAP SIDING
			55 WOOD SIDING
			56 ATTIC VENT
			57 WOOD STEPS
			58 4'X8' SKYLIGHT
			59 2'X2' SKYLIGHT
			60 VINYL FLOORING
			61 ENGINEERED WOOD FLOOR
			62 WOOD FASCIA RAFTER
			63 SHEET ROLL ROOFING
			64 ROOF SCUPPER
			65 ROOF VENT
			66 ELECTRIC METER
			67 WOOD FRAMED UTIL. CHASE
			68 WOOD BEAM
			69 1X4 WOOD CORNER TRIM
			70 1X6 BEAD BOARD CEILING WITH MIDPOINT BEAD. SEE 9 /TP-3
			71 2X4 STUD WALL 16" O.C.



4 TYP. DETAIL. FRIEZE, BRACKET, CORNICE
3" = 1'-0"



3 DETAIL OF FRIEZE, BRACKET, CORNICE @ BAY
3" = 1'-0"



LEGEND

NOTES

- A. MATERIALS OR CONSTRUCTION FROM PERIOD OF SIGNIFICANCE LABELLED "1882" U.N.O.
- B. NON-PERIOD OF SIGNIFICANCE MATERIALS ARE NOT LABELLED

1 CONCRETE DRIVE	8 WOOD DECK	16 WOOD D.H. WINDOW	24 FRIEZE PANEL 1882	32 WOOD CAPITAL 1882	40 2X6 FLOOR JOIST 1882	48 WOOD DOOR	56 ATTIC VENT	65 ROOF VENT
2 FENCE	9 WOOD RAILING	17 WOOD CASING /TRIM 1882	25 WOOD CORNICE 1882	33 WOOD DENTIL 1882	41 2X6 FLOOR JOIST	49 CARPET	57 WOOD STEPS	66 ELECTRIC METER
3 CONCRETE STREET CURB	10 CONCRETE STEPS	18 WOOD CASEMENT	26 WOOD GUTTER 1882	34 WOOD DENTIL	42 1X4 WOOD PLANK 1882	50 TILE	58 4'X8' SKYLIGHT	67 WOOD FRAMED UTIL. CHASE
4 BRICK PAVER	11 LANDSCAPE	19 VINYL SLIDER WINDOW	27 WOOD BRACKET 1882	35 WOOD BASEBOARD 1882	43 4X4 POST 1882	51 FIREPLACE	59 2'X2' SKYLIGHT	68 WOOD BEAM
5 WOOD SHED	12 1X VERTICAL WOOD BOARD 1882	20 PANEL DOOR	28 WOOD ROUND CORNER TRIM 1882 SEE DETAIL 5/ TP-3	36 OAK FLOORING 2 1/4" WIDTH	44 4X4 BEAM 1882	52 BUILT IN CABINET 1882	60 VINYL FLOORING	69 1X4 WOOD CORNER TRIM
6 CONCRETE RETAINING WALL	13 1X SIDING "FLUSH JOINT" 1882 SEE DETAIL 7 / TP-3	21 TRANSOM WINDOW 1882 SEE DETAIL 5 /TP-2	29 WOOD ROUND CAP 1882 SEE DETAIL 5 / TP-3	37 2X4 CEILING JOIST 1882	45 1X10 WOOD SHEATHING BOARD 1882 TYP. WALL 2X4 @32"O.C. WITH INTERMEDIATE 1X4 MEMBER	53 BOOKSHELVES	61 ENGINEERED WOOD FLOOR	70 1X6 BEAD BOARD CEILING WITH MIDPOINT BEAD. SEE 9 /TP-3
	14 WOOD SHINGLE ROOF 1882 SEE 6 /TP-3	22 1X SKIRT BOARD 1882	30 WOOD PLINTH 1882	38 2X4 ROOF RAFTER 1882	46	54 WOOD SHIPLAP SIDING	62 WOOD FASCIA RAFTER	71 2X4 STUD WALL 16" O.C.
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							64 ROOF SCUPPER	

PROJECT:

JOHN AND MARY WRIGHT HOUSE, 454 13TH AVE.
CITY OF SAN DIEGO HISTORIC RESOURCE SITE #1278,
BUILT 1882.

CLIENT: NAKHSHAB DESIGN DEVELOPMENT
340 15TH STREET, SAN DIEGO, CA 92101

ARCHITECT:

UNION ARCHITECTURE, INC.

JOHN H. EISENHART, ARCHITECT
EVA L.J. THORN, INTERIORS

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DATE: 01.19.2018
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TP-4

SHEET 6 OF 6

MONITORING PLAN

DATE: May 23, 2018

PROJECT: Move off site:
454 13th Street
City historic resource # 1278
San Diego, Ca. 92101
Assessors Parcel# 535-156-08-00

Temp. Storage facility / move-on/off site:
1141 E Street
San Diego, CA 92101

Move on site:
454 13th Street
San Diego, Ca. 92101
Assessors Parcel# 535-156-08-00

PROJECT TEAM:

D: Developer: NDD (Nakshab Development & Design)
PA: Project Architect: NDD
HA: Historic Architect: NDD
HAM: Historic Architect Monitor: John Eisenhart, Union Architecture
PI: Principal Investigator: Law Office of Marie Burke Lia. Marie Burke Lia Attorney
CM: Construction Manager: NDD
HM: House Mover: Joe Hansen, John T. Hansen Enterprises
BI: Building Inspector: City of San Diego Development Services: Environmental and Historical staff.
RE: Resident Engineer: NDD

PROPERTY DESCRIPTION:

The structure at 454 13th Street (John and Mary Wright House) is a historically designated single story example of an Italianate Style residence. Building date is 1882. The main structure is of rectangular form 32'-3" x 24'-2" and has a flat roof with projecting cornice (containing wood gutter), wood brackets, cornice, frieze on perimeter at roof wall junction. The building has two prominent bays on the east façade, the main entry porch on the northeast corner, has a wood shingled mansard roof (with cornice and wood dentils), supported by a round wood column (tuscan style). Exterior materials consist of 1x redwood "flush joint" tongue and groove siding (4 1/8" exposure, painted), one over one wood double hung windows, wood casing and trim.

An addition on the west side of the historic building, containing a kitchen, bathrooms and bedroom, is non-historic (1942).

A wood deck and railing extending the original entry area and steps on east side and a wood deck and steps off of the non-historic addition on the west side are non-original.

A 7 story apartment building with penthouse and basement will be constructed at the site at 454 13th Street. To facilitate this development the resource has to be temporarily removed from the site. Once the shell of the new development is completed the resource is to be returned to the site. The new location of the resource will be approximately 4'-0" south and 17'-0" east from it's original location on the same lot, it will be incorporated into the street level commercial space of the new development.

This Treatment Plan is being prepared to dismantle and temporarily remove the historic portion of the building from its current location at 454 13th Street (Assessors Parcel# 535-156-08-00). The resource is to be moved to and stored safely at a warehouse at 1141 E Street, San Diego, CA 92101. Approximate moving distance is 1 mile each way.

Monitoring at Move-Off Site "A" : 454 13th Street City, San Diego, Ca. 92101, Assessors Parcel# 535-156-08-00, See area to be monitored figure 1 , 2 and 3 below.

1. Overview of Treatment Plan and Monitoring Plan (HAM, HA, PI, PA, CM, BI, D, HM).

Issue: Pre-construction meeting as related to historic resource on site. Discuss sequence and type of work to be done prior to move. General methods of protection of structure during demolition work of non-historic additions to be discussed.

2. Preparation of resource for moving (HAM, HA, CM).

Issue: Monitor to be present prior to any disassembly of structure. Location marks of cuts by HM to be determined, general method of disassembly and support to be discussed and approved by HAM per Treatment Plan.

3. Final review of preparation of resource for moving (HAM, HA, CM, HM).

Issue: Monitor to review after completion of the following work: Removal of exterior plumbing, electrical lines. Monitor to take inventory of wood shingles, braces, windows and doors to be salvaged per Treatment Plan. Bracing and protection of structure prior to move off date.

Per Treatment Plan the historic structure shall be dismantled into approximately five pieces. Mansard roof and porch as well as bays shall be braced as one piece. All pieces shall be labeled / catalogued. To be reviewed by HAM.

The historic resources will be moved to site "B" Storage Facility at 1141 "E" Street.

Monitoring at Move-Off Site "B" Storage Facility at 1141 "E" Street. See area to be monitored figure 4 below.

4. Move-off storage site (HAM,CM).

Issue: Review work involved by CM to brace and protect structure for storage duration.

5. Continuing monitoring of structures at storage facility (HAM).

Issue: Review protection of resource every 3 months or as required if damage occurs, issue report documenting the damage.

6. Pre-construction meeting move-on site. (HAM, HA, PI, CM, BI, D)

Issue: Overview of Treatment Plan, Architectural, Landscaping and Engineering Documents as related to move-on site. Review work involved by CM to prepare site for arrival of structure.

7. New foundation, utilities, site preparation for move on (HAM, HA, CM, HM)

Issue: Review of work on site to assure work will properly receive move-on of resource.

Monitoring at Move-Off Site “B” Storage Facility at 1141 “E” Street to Move-On Site “A” at 454 13th Street.

8. Move-on site (HAM, HA, CM, BI).

Issue: Review move-on site with resource present. Overview of Treatment Plan for rehabilitation of resource, Architectural, Landscaping and Engineering Documents.

9. Move-on site as required by construction activity (HAM, HA, CM).

Issue: Review rehabilitation of resource in accordance with Treatment Plan and Architectural, Landscaping and Engineering Documents.

10. Final Monitoring (HAM, HA, CM, D).

Issue: Final punch list of items to complete according Treatment Plan and Architectural, Landscaping and Engineering Documents.

11. Draft Report (HAM, BI).

Issue: Draft report of monitor process to be submitted to BI for review.

12. Final Report (HAM, BI, PI, D).

Issue: Final report of monitoring process, submit to PI for distribution to City of San Diego Developmental Services Department, San Diego History Center for archiving.

RECORDING REQUESTED BY:

Civic San Diego
Planning Department
401 B Street, Suite 400
San Diego, CA 92101

AND WHEN RECORDED MAIL TO:

Civic San Diego
Planning Department
401 B Street, Suite 400
San Diego, CA 92101

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POSSESSION THEREOF*

**CENTRE CITY DEVELOPMENT PERMIT/
SITE DEVELOPMENT PERMIT
NO. 2018-07**

**EZABELLE
454 13TH STREET
APN 535-156-08-00**

**CENTRE CITY DEVELOPMENT PERMIT/
SITE DEVELOPMENT PERMIT
NO. 2018-07**

**EZABELLE
APN 533-353-10**

This Centre City Development Permit / Site Development Permit (CCDP/SDP) No. 2018-07 is granted by the City of San Diego Planning Commission (“Planning Commission”) to Soheil Nakhshab on behalf of NDD on 13th Street, LLC, Owner/Permittee, to allow: 1) the substantial alteration of Historical Resources Board (HRB) Site No. 1278, the John and Mary Wright House (“Wright House”), and, 2) the construction of a residential development known as Ezabelle (“Project”) on the 4,200 square foot (SF) premises located at 424 13th Street in the East Village neighborhood of the Downtown Community Plan (DCP) area and within the Centre City Planned District (CCPD); and more particularly described as the North 8 feet of Lot J and the South 34 feet of Lot K in Block 106 of Horton’s Addition, in the City of San Diego, County of San Diego, State of California, according to Map thereof made by L.L. Lockling on file in the Office of the County Recorder of said San Diego County.

Subject to the terms and conditions set forth in this Permit, permission is granted to the Owner/Permittee to construct and operate a development and uses as described and identified by size, dimension, quantity, type and location as follows and on the approved Basic Concept/Schematic Drawings and associated Color and Materials Boards dated July 9, 2018 on file at Civic San Diego (“CivicSD”).

1. General

The Owner and/or Permittee shall construct, or cause to be constructed on the site, a development consisting of a 7-story (approximately 77-foot tall), residential development located on a 4,200 SF premises located on the west side of 13th Street between Island Avenue and J Street in the East Village neighborhood. The Project contains 45 dwelling units (DU) and approximately 1,722 SF of commercial space. The total Floor Area Ratio (FAR) of the development for all uses above ground shall not exceed 5.9. The development shall not exceed a height of 77 feet above grade level, measured to the top of the parapet of the uppermost floor, with roof equipment enclosures, elevator penthouses, mechanical screening and architectural elements above this height permitted per the Centre City Planned District Ordinance (CCPDO).

2. Site Development Permit (SDP)

On July 19, 2018, Planning Commission made the findings under San Diego Municipal Code (SDMC) Sections 126.0505(a) & (i) and approved SDP No. 2018-07 allowing substantial alterations to City of San Diego HRB Site No. 1278, the Wright House, located at 454 13th Street, subject to compliance with the Downtown Community Plan Mitigation, Monitoring, and Reporting Program (MMRP) Measure HIST A.1-2.

3. Affordable Housing Regulations: The Owner/Permittee shall provide a minimum of six affordable units restricted for very low-income residents per Section 143.0720 of the SDMC. An agreement with the San Diego Housing Commission shall be executed to enforce and monitor the affordability restrictions prior to issuance of any building permit for construction of the Project.
4. Affordable Housing Incentives: The Planning Commission hereby grants the following incentives pursuant to Section 143.0740 of the SDMC for deviations to the following development regulations within the CCPDO and SDMC:
 - a. CCPDO Section 156.0310(f)(1): Commercial Space Depth. The minimum depth of the ground floor commercial space may be reduced from 25 feet to 23.5 feet.
 - b. CCPDO Section 156.0313(d), SDMC Section 143.0744(b): Parking Requirement. The requirement for 11 off-street parking spaces to serve the development is waived; therefore, no parking spaces are required for the Project.

PLANNING AND DESIGN REQUIREMENTS

5. Urban Design Standards: The proposed development, including its architectural design concepts and off-site improvements, shall be consistent with the CCPDO and Centre City Streetscape Manual (CCSM). These standards, together with the following specific conditions, will be used as a basis for evaluating the development through all stages of the development process.
 - a. Architectural Standards – The architecture of the development shall establish a high quality of design and complement the design and character of the East Village neighborhood as shown in the approved Basic Concept/Schematic Drawings dated July 9, 2018 on file with CivicSD. The development shall utilize a coordinated color scheme consistent with the approved Basic Concept/Schematic Drawings.
 - b. Form and Scale – The 7-story residential development will have an uppermost height of approximately 77 feet tall measured to the top of the roofline and/or parapet, with roof equipment enclosures, elevator penthouses, and mechanical screening above this height permitted per the CCPDO and the Federal Aviation Administration (FAA).
 - c. Building Materials – All building materials shall be of a high quality as shown in the Basic Concept/Schematic Drawings and approved materials board. All materials and installation shall exhibit high-quality design, detailing, and construction execution to create a durable and high quality finish. The base of the buildings shall be clad in upgraded materials and carry down to within one inch of finish sidewalk grade. Any plaster materials shall consist of a hard troweled, or equivalent, smooth finish. Any graffiti coatings shall be extended the full height of the upgraded base materials or up to a natural design break such a cornice line. All downspouts, exhaust caps, and other additive elements shall be superior grade for urban locations, carefully composed to reinforce the architectural design. Reflectivity of the glass shall be the minimum reflectivity required by Title 24.

All construction details shall be of the highest standard and executed to minimize weathering, eliminate staining, and not cause deterioration of materials on adjacent properties or the public right of way. No substitutions of materials or colors shall be permitted without the prior written consent of the CivicSD. A final materials board which illustrates the location, color, quality, and texture of proposed exterior materials shall be submitted with 100% Construction Drawings and shall be consistent with the materials board approved with the Basic Concept/Schematic Drawings.

- d. Street Level Design – Architectural features such as awnings and other design features which add human scale to the streetscape are encouraged where they are consistent with the design theme of the structure. Exit corridors including garage/motor-court entrances shall provide a finished appearance to the street with street level exterior finishes wrapping into the openings a minimum of ten feet.

All exhaust caps, lighting, sprinkler heads, and other elements on the undersides of all balconies and surfaces shall be logically composed and placed to minimize their visibility, while meeting code requirements. All soffit materials shall be high quality and consistent with adjacent elevation materials (no stucco or other inconsistent material), and incorporate drip edges and other details to minimize staining and ensure long-term durability.

- e. Planters – The west elevation shall contain planters intermixed with the balconies. The planter materials shall be maintained in healthy condition and all irrigation drainage shall be contained within the property.
- f. Utilitarian Areas – Areas housing trash, storage, or other utility services shall be located in the garage or otherwise completely concealed from view of the ROW and adjoining developments, except for utilities required to be exposed by the City or utility company. The development shall provide trash and recyclable material storage areas per SDMC sections 142.0810 and 142.0820. Such areas shall be provided within an enclosed building/garage area and shall be kept clean and orderly at all times. The development shall implement a recycling program to provide for the separation of recyclable materials from the non-recyclable trash materials.
- g. Mail and Delivery Locations – It is the Owner's and/or Permittee's responsibility to coordinate mail service and mailbox locations with the United States Postal Service and to minimize curb spaces devoted to postal/loading use. The Owner and/or Permittee shall locate all mailboxes and parcel lockers outside of the ROW, either within the building or recessed into a building wall. A single, centralized interior mail area in a common lobby area is encouraged for all residential units within a development, including associated townhouses with individual street entrances. Individual commercial spaces shall utilize a centralized delivery stations within the building or recessed into a building wall, which may be shared with residential uses sharing a common street frontage address.
- h. Circulation and Parking – The Owner and/or Permittee shall prepare a plan which identifies the location of curbside parking control zones, parking meters, fire hydrants,

trees, and street lights. Such plan shall be submitted in conjunction with 100% Construction Drawings. All on-site parking shall meet the requirements of the City Building Official, Fire Department, and Engineer.

- i. Open Space and Development Amenities – A landscape plan that illustrates the relationship of the proposed on and off-site improvements and the location of water, and electrical hookups shall be submitted with 100% Construction Drawings.
 - j. Roof Tops – A rooftop equipment and appurtenance location and screening plan shall be prepared and submitted with 100% Construction Drawings. Any roof-top mechanical equipment must be grouped, enclosed, and screened from surrounding views (including views from above). Individual condenser units, when appropriately grouped and in an organized layout, are exempt from the overhead screening.
 - k. Signage – All signs shall comply with the City Sign Regulations and the CCPDO.
 - l. Lighting – A lighting plan which highlights the architectural qualities of the proposed development and also enhances the lighting of the ROW shall be submitted with 100% Construction Drawings. All lighting shall be designed to avoid illumination of adjoining properties.
 - m. Noise Control – All mechanical equipment, including but not limited to, air conditioning, heating and exhaust systems, shall comply with the City of San Diego Noise Ordinance and California Noise Insulation Standards as set forth in Title 24. All mechanical equipment shall be located to mitigate noise and exhaust impacts on adjoining development, particularly residential. Owner and/or Permittee shall provide evidence of compliance at 100% Construction Drawings.
 - n. Energy Considerations – The design of the improvements shall include, where feasible, energy conservation construction techniques and design, including cogeneration facilities, and active and passive solar energy design. The Owner and/or Permittee shall demonstrate consideration of such energy features during the review of the 100% Construction Drawings.
 - o. Street Address – Building address numbers shall be provided that are visible and legible from the ROW.
6. On-Site Improvements: All off-site and on-site improvements shall be designed as part of an integral site development. An on-site improvement plan shall be submitted with the 100% Construction Drawings. Any on-site landscaping shall establish a high quality of design and be sensitive to landscape materials and design planned for the adjoining ROW.

PUBLIC IMPROVEMENTS, LANDSCAPING AND UTILITY REQUIREMENTS

7. Off-Site Improvements: The following public improvements shall be installed in accordance with the Centre City Streetscape Manual (CCSM). The CCSM is currently being updated

and the Owner and/or Permittee shall install the appropriate improvements according to the latest requirements at the time of Building Permit issuance:

	13 th Street
Street Trees	London Plane Tree
Sidewalk Paving	Ballpark Paving
Street Lights	Standard Street Lights

- a. Street Trees – Street tree selections shall be made according to the CCSM. All trees shall be planted at a minimum 36-inch box size with tree grates provided as specified in the CCSM, and shall meet the requirements of Title 24. Tree spacing shall be accommodated after street lights have been sited, and generally spaced 20 to 25 feet on center. All landscaping shall be irrigated with private water service from the subject development.
- b. Street Lights – The existing street light shall be evaluated to determine if they meet current CivicSD and City requirements, and shall be modified or replaced if necessary.
- c. Sidewalk Paving – Any specialized paving materials shall be approved through the execution of an Encroachment Removal and Maintenance Agreement (EMRA) with the City.
- d. Landscaping – All required landscaping shall be maintained in a disease, weed and litter free condition at all times. If any required landscaping (including existing or new plantings, hardscape, landscape features, etc.) indicated on the approved construction documents is damaged or removed during demolition or construction, it shall be repaired and/or replaced in kind and equivalent in size per the approved documents and to the satisfaction of the CivicSD within 30 days of damage or Certificate of Occupancy.
- e. Planters – Planters shall be permitted to encroach into the ROW a maximum of two feet for sidewalk areas measuring at least twelve feet and less than fourteen feet in width. For sidewalk areas fourteen feet or wider, the maximum permitted planter encroachment shall be three feet. The planter encroachment shall be measured from the property line to the face of the curb to the wall surrounding the planter. A minimum five foot clear path shall be maintained between the face of the planter and the edge of any tree grate or other obstruction in the ROW.
- f. On-Street Parking – The Owner and/or Permittee shall maximize the on-street parking wherever feasible.
- g. Public Utilities – The Owner and/or Permittee shall be responsible for the connection of on-site sewer, water and storm drain systems from the development to the City utilities located in the ROW. Sewer, water, and roof drain laterals shall be connected to the appropriate utility mains within the street and beneath the sidewalk. The Owner and/or Permittee may use existing laterals if acceptable to the City, and if not, Owner and/or

Permittee shall cut and plug existing laterals at such places and in the manner required by the City, and install new laterals. Private sewer laterals require an EMA.

If it is determined that existing water and sewer services are not of adequate size to serve the proposed development, the Owner and/or Permittee will be required to abandon any unused water and sewer services and install new services and meters. Service abandonments require an engineering permit and must be shown on a public improvement plan. All proposed public water and sewer facilities, including services and meters, must be designed and constructed in accordance with established criteria in the most current edition of City's Water and Sewer Facility Design Guidelines and City regulations standards and practices pertaining thereto.

Proposed private underground sewer facilities located within a single lot shall be designed to meet the requirements of the California Uniform Plumbing Code and shall be reviewed as part of the Building Permit plan check. If and when the Owner and/or Permittee submits for a tentative map or tentative map waiver, the Water Department will require Covenants, Conditions, and Restrictions ("CC&Rs") to address the operation and maintenance of the private on-site water system serving the development. No structures or landscaping of any kind shall be installed within ten feet of water facilities.

All roof drainage and sump drainage, if any, shall be connected to the storm drain system in the public street, or if no system exists, to the street gutters through sidewalk underdrains. Such underdrains shall be approved through an Encroachment Removal Agreement with the City. The Owner and/or Permittee shall comply with the City's Storm Water Management and Discharge Control Ordinance and the storm water pollution prevention requirements of Chapter 14, Article 2, Division 1 and Chapter 14, Article 2, Division 2 of the SDMC.

- h. Franchise Public Utilities – The Owner and/or Permittee shall be responsible for the installation or relocation of franchise utility connections including, but not limited to, gas, electric, telephone and cable, to the development and all extensions of those utilities in public streets. Existing franchise utilities located above grade serving the property and in the sidewalk ROW shall be removed and incorporated into the adjoining development where feasible. All franchise utilities shall be installed as identified in the Basic Concept Drawings. Any above grade devices shall be screened from view from the ROW.
- i. Fire Hydrants – If required, the Owner and/or Permittee shall install fire hydrants at locations satisfactory to the City's Fire Department and DSD.
- j. Water Meters and Backflow Preventers – The Owner and/or Permittee shall locate all water meters and backflow preventers in locations satisfactory to the Public Utilities Department and CivicSD. Backflow preventers shall be located outside of the ROW adjacent to the development's water meters, either within the building, a recessed alcove area, or within a plaza or landscaping area. The devices shall be screened from view from the ROW.

All items of improvement shall be performed in accordance with the technical specifications, standards, and practices of the City's Engineering, Public Utilities, and Building Inspection Departments and shall be subject to their review and approval. Improvements shall meet the requirements of Title 24.

8. Storm Water Compliance

- a. Prior to issuance of any construction permit, the Owner and/or Permittee shall enter into a Maintenance Agreement for the on-going permanent Best Management Practices (BMP) maintenance, satisfactory to the City Engineer.
- b. Prior to the issuance of any Construction Permit, the Owner and/or Permittee shall incorporate any construction BMP necessary to comply with Chapter 14, Article 2, Division 1 (Grading Regulations) of the SDMC, into the construction plans or specifications.
- c. Prior to issuance of any construction permits, the Owner and/or Permittee shall submit a Water Pollution Control Plan (WPCP). The WPCP shall be prepared in accordance with the guidelines in Part 2 Construction BMP Standards, Chapter 4 of the Storm Water Standards.
- d. Prior to the issuance of any construction permit, the Storm Water Quality Management Plan will be subject to final review and approval by the City Engineer.

9. Engineering

- a. All excavated material listed to be exported shall be exported to a legal disposal site in accordance with the Standard Specifications for Public Works Construction (the Green Book), 2015 edition and Regional Supplement Amendments adopted by Regional Standards Committee.
- b. The drainage system proposed for the development shall be approved by the City Engineer.
- c. Prior to the issuance of any building permits, the Owner/Permittee shall obtain an Encroachment Maintenance Removal Agreement (EMRA) from the City Engineer for the new sidewalk, curb, and gutter, curb outlets/sidewalk underdrains, trees, tree grates, landscaping, and irrigation.
- d. Prior to the issuance of any building permits, the Owner/Permittee shall obtain an Encroachment Maintenance Removal Agreement (EMRA) from the City Engineer for balconies encroachments on 13th Street public right-of-way.
- e. Prior to the issuance of any building permits, the Owner/Permittee shall assure, by permit and bond, removal of the existing sidewalk along 13th Street frontage and replacement per current standards satisfactory to the City Engineer.

- f. Prior to the issuance of any building permits, the Owner/Permittee shall assure, by permit and bond, closure of the existing driveway on 13th Street by restoring curb/gutter and sidewalk per current standards satisfactory to the City Engineer.

10. Public Utilities – Water & Sewer

- a. Prior to the issuance of any construction permit, the Owner/Permittee shall provide CC&Rs for the operation and maintenance of all private water and sewer facilities in a manner satisfactory to the Public Utilities Director and City Engineer.
- b. Utilization of existing sewer laterals is at the sole risk and responsibility of the developer to ensure the laterals are functional and connected to a public sewer facility. Prior to connected to any existing sewer lateral, the lateral shall be inspected using a closed-circuit television (CCTV) by a California licensed plumbing contractor to verify the lateral is in good working condition and free of all debris.
- c. Prior to the issuance of any building permits, the Owner/Permittee shall apply for a plumbing permit for the installation of appropriate above ground private back flow prevention device(s) (BFPD) on each water service (domestic, fire, and irrigation) in a manner satisfactory to the Public Utilities Director and City Engineer. BFPDs are typically located on private property in line with the service and immediately adjacent to the right-of-way. The Public Utilities Department will not permit the required BFPDs to be located below grade or within the structure.
- d. Prior to the issuance of any building permits, the Owner/Permittee shall assure, by permit and bond, the design and construction of any new water and sewer service(s) outside of any driveway, and the disconnection at the water main of the existing unused water service adjacent to the Project site in a manner satisfactory to the Public Utilities Director and City Engineer.
- e. All proposed private sewer facilities located within a single lot are to be designed to meet the requirements of the California Plumbing Code and will be reviewed as part of the building permit plan check.
- f. All proposed public water and sewer facilities must be design and constructed in accordance with established criteria in the most current edition of the City of San Diego Water and Sewer Facility Design Guidelines and City regulations, standards, and practices pertaining thereto.
- g. All on-site water and sewer facilities shall be private.
- h. No trees or shrubs exceeding three feet in height at maturity shall be installed within ten feet of any sewer and five feet of any water facilities.

11. Removal and/or Remedy of Soil and/or Water Contamination: The Owner and/or Permittee shall (at its own cost and expense) remove and/or otherwise remedy as provided by law and implementing rules and regulations, and as required by appropriate governmental authorities,

any contaminated or hazardous soil and/or water conditions on the Site. Such work may include without limitation the following:

- a. Remove (and dispose of) and/or treat any contaminated soil and/or water on the site (and encountered during installation of improvements in the adjacent ROW which the Owner and/or Permittee is to install) as necessary to comply with applicable governmental standards and requirements.
 - b. Design construct all improvements on the site in a manner which will assure protection of occupants and all improvements from any contamination, whether in vapor or other form, and/or from the direct and indirect effects thereof.
 - c. Prepare a site safety plan and submit it to the appropriate governmental agency, CivicSD, and other authorities for approval in connection with obtaining a building permit for the construction of improvements on the site. Such site safety plan shall assure workers and other visitors to the site of protection from any health and safety hazards during development and construction of the improvements. Such site safety plan shall include monitoring and appropriate protective action against vapors and/or the effect thereof.
 - d. Obtain from the County of San Diego and/or California Regional Water Quality Control Board and/or any other authorities required by law any permits or other approvals required in connection with the removal and/or remedy of soil and/or water contamination, in connection with the development and construction on the site.
 - e. If required due to the presence of contamination, an impermeable membrane or other acceptable construction alternative shall be installed beneath the foundation of the building. Drawings and specifications for such vapor barrier system shall be submitted for review and approval by the appropriate governmental authorities.
12. Geology: Prior to the issuance of any construction permits (either grading or building), the Owner/Permittee shall submit a geotechnical investigation report or update letter prepared in accordance with the City's Guidelines for Geotechnical Reports that specifically addressed the proposed construction plans. The geotechnical investigation report or update letter shall be reviewed for adequacy by the Geology Section of the Development Services Department prior to the issuance of any construction permits.

SUSTAINABILITY

13. Cool/green roofs must be utilized in the development including:

- a. Roofing materials with a minimum three-year aged solar reflection and thermal emittance or solar reflection index equal to or greater than the values specified in the voluntary measures under the California Green Building Standards Code must be implemented.

Compliance with this measure must be demonstrated prior to the issuance of the building permit.

14. The development must include, at a minimum, the following fixtures (if provided):

a. Residential Buildings

- Kitchen faucets: maximum flow rate not to exceed 1.5 gallons per minute at 60 psi;
- Standard dishwashers: 4.25 gallons per cycle;
- Compact dishwashers: 3.5 gallons per cycle; and,
- Clothes washers: water factor of 6 gallons per cubic feet of drum capacity.

Compliance with this measure must be demonstrated prior to the issuance of the building permit.

15. The development must be designed to have an energy budget that meets or exceeds a 10% improvement with both indoor lighting and mechanical systems when compared to the Title 24, Part 6 Energy Budget for the proposed design building as calculated by Compliance Software certified by the California Energy Commission (percent improvement over current code). The demand reduction may be provided through on-site renewable energy generation, such as solar, or by designing the project to have an energy budget that meets the above-mentioned performance standards, when compared to the Title 24, Part 6 Energy Budget for the Proposed Design Building (percent improvement over current code). Compliance with this measure must be demonstrated prior to the issuance of the building permit.

STANDARD REQUIREMENTS

16. Environmental Impact Mitigation Monitoring and Reporting Program: As required by CCPDO Section 156.0304(h), the development shall comply with all applicable Mitigation Monitoring and Reporting Program (MMRP) measures from the 2006 Downtown Final Environmental Impact Report (Downtown FEIR) for the DCP.
17. Development Impact Fees: The development will be subject to Centre City Development Impact Fees. For developments containing commercial space(s) the Owner and/or Permittee shall provide to the City's Facilities Financing Department the following information at the time of application for building permit plan check: 1) total square footage for commercial lease spaces and all areas within the building dedicated to support those commercial spaces including, but not limited to: loading areas, service areas and corridors, utility rooms, and commercial parking areas; and 2) applicable floor plans showing those areas outlined for verification. In addition, it shall be responsibility of the Owner and/or Permittee to provide all necessary documentation for receiving any "credit" for existing buildings to be removed.
18. Construction Fence: Owner and/or Permittee shall install a construction fence pursuant to specifications of, and a permit from, the City Engineer. The fence shall be solid plywood with wood framing, painted a consistent color with the development's design, and shall contain a pedestrian passageway, signs, and lighting as required by the City Engineer. The fencing shall be maintained in good condition and free of graffiti at all times.

19. Development Identification Signs: Prior to commencement of construction on the site, the Owner and/or Permittee shall prepare and install, at its cost and expense, one sign on the barricade around the site which identifies the development. The sign shall be at least four feet by six feet and be visible to passing pedestrian and vehicular traffic. The signs shall at a minimum include:

- Color rendering of the development
- Development name
- Developer
- Completion Date
- For information call _____

Additional development signs may be provided around the perimeter of the site. All signs shall be limited to a maximum of 160 SF per street frontage. Graphics may also be painted on any barricades surrounding the site. All signs and graphics shall be submitted to the CivicSD for approval prior to installation.

20. This Permit must be utilized within thirty-six (36) months after the date on which all rights of appeal have expired. If this Permit is not utilized in accordance with Section 126.0108 of the SDMC within the 36 month period, this permit shall be void unless an Extension of Time (EOT) has been granted pursuant to Section 126.0111 of the SDMC.
21. Issuance of this Permit by CivicSD does not authorize the Owner and/or Permittee for this Permit to violate any Federal, State or City laws, ordinances, regulations or policies.
22. This Permit is a covenant running with the subject property and all of the requirements and conditions of this Permit and related documents shall be binding upon the Owner and/or Permittee and any successor(s) in interest.
23. This development shall comply with the standards, policies, and requirements in effect at the time of approval of this development, including any successor(s) or new policies, financing mechanisms, phasing schedules, plans and ordinances adopted by the City.
24. No permit for construction, operation, or occupancy of any facility or improvement described herein shall be granted, nor shall any activity authorized by this Permit be conducted on the premises until this Permit is recorded in the Office of the San Diego County Recorder.
25. The Owner/Permittee shall defend, indemnify, and hold harmless the CivicSD and the City, its agents, officers, and employees from any and all claims, actions, proceedings, damages, judgments, or costs, including attorney's fees, against the City or its agents, officers, or employees, relating to the issuance of this Permit including, but not limited to, any action to attack, set aside, void, challenge, or annul this development approval and any environmental document or decision. The CivicSD will promptly notify the Owner/Permittee of any claim, action, or proceeding and, if CivicSD should fail to cooperate fully in the defense, the Owner/Permittee shall not thereafter be responsible to

defend, indemnify, and hold harmless the City or its agents, officers, and employees. CivicSD may elect to conduct its own defense, participate in its own defense, or obtain independent legal counsel in defense of any claim related to this indemnification. In the event of such election, the Owner/Permittee shall pay all of the costs related thereto, including without limitation reasonable attorney's fees and costs. In the event of a disagreement between CivicSD and the Owner/Permittee regarding litigation issues, the CivicSD shall have the authority to control the litigation and make litigation related decisions, including, but not limited to, settlement or other disposition of the matter. However, the Owner/Permittee shall not be required to pay or perform any settlement unless such settlement is approved by Owner/Permittee.

26. All of the conditions contained in this Permit have been considered and were determined necessary to make the findings required for approval of this Permit. The Permit holder is required to comply with each and every condition in order to maintain the entitlements that are granted by this Permit. If any condition of this Permit, on a legal challenge by the Owner/Permittee of this Permit, is found or held by a court of competent jurisdiction to be invalid, unenforceable, or unreasonable, this Permit shall be void. However, in such an event, the Owner/Permittee shall have the right, by paying applicable processing fees, to bring a request for a new permit without the "invalid" condition(s) back to the discretionary body which approved the Permit for a determination by that body as to whether all of the findings necessary for the issuance of the proposed permit can still be made in the absence of the "invalid" condition(s). Such hearing shall be a hearing de novo, and the discretionary body shall have the absolute right to approve, disapprove, or modify the proposed permit and the condition(s) contained there.

This CCDP/ SDP No. 2018-07 is granted by the City of San Diego Planning Commission on July 19, 2018.

CIVIC SAN DIEGO:

OWNER/PERMITEE:

James Alexander
Associate Planner

Date

Soheil Nakhshab
NDD on 13th Street, LLC

Date

**Note: Notary acknowledgment
must be attached per Civil Code
Section 1189 et seq**

**PLANNING COMMISSION
RESOLUTION NO. XXXX-PC
CENTRE CITY DEVELOPMENT PERMIT
SITE DEVELOPMENT PERMIT
EZABELLE PROJECT NO. 2018-07**

WHEREAS, Soheil Nakhshab on behalf of NDD on 13th Street, LLC, Owner/Permittee, filed an application with Civic San Diego (CivicSD) for a Centre City Development Permit/Site Development Permit (CCDP/SDP) No. 2018-07 to allow 1) for the construction of an 7-story (approximately 77-foot tall) residential development comprised of 45 residential units and zero parking spaces; and, 2) for the substantial alteration of a designated historical resource;

WHEREAS, the project site is located on a 4,200 square foot (SF) lot located at 424 13th Street in the East Village neighborhood of the Downtown Community Plan (DCP) area (“Downtown”);

WHEREAS, the project site is legally described as the North 8 feet of Lot J and the South 34 feet of Lot K in Block 106 of Horton’s Addition, in the City of San Diego, County of San Diego, State of California, according to Map thereof made by L.L. Lockling on file in the Office of the County Recorder of said San Diego County.

WHEREAS, on May 16, 2018, the Downtown Community Planning Council considered a staff report and public testimony and voted 15-1 to recommend approval for CCDP/SDP No. 2018-07;

WHEREAS, on May 23, 2018, Civic San Diego considered a staff report and public testimony and voted 8-0 to recommend approval for CCDP/SDP No. 2018-07;

WHEREAS, on June 28, 2018, the Historic Resources Board considered a staff report and public testimony and voted 8-1 to recommend adoption of the findings and mitigation measures for CCDP/SDP No. 2018-07;

WHEREAS, on July 19, 2018, the Planning Commission of the City of San Diego held a duly noticed public hearing and considered a staff report and public testimony for CCDP/SDP No. 2018-07 pursuant to the Land Development Code of the City of San Diego;

WHEREAS, Development within the Downtown Community Planning area is covered under the following documents, all referred to as the “Downtown FEIR”: Final Environmental Impact Report (FEIR) for the San Diego Downtown Community Plan, Centre City Planned District Ordinance, and 10th Amendment to the Centre City Redevelopment Plan, certified by the former Redevelopment Agency (“Former Agency”) and the City Council on March 14, 2006 (Resolutions R-04001 and R-301265, respectively); subsequent addenda to the FEIR certified by the Former Agency on August 3, 2007 (Former Agency Resolution R-04193), April 21, 2010 (Former Agency Resolution R-04510), and August 3, 2010 (Former Agency Resolution R-04544), and certified by the City Council on February 12, 2014 (City Council Resolution R-308724) and July 14, 2014 (City Council Resolution R-309115); and, the Final Supplemental Environmental Impact Report for the Downtown San Diego Mobility Plan certified by the City Council on June 21, 2016 (Resolution R-310561). Development within the Downtown

Community Planning area is also covered under the following documents, all referred to as the “CAP FEIR”: FEIR for the City of San Diego Climate Action Plan (CAP), certified by the City Council on December 15, 2015 (City Council Resolution R-310176), and the Addendum to the CAP, certified by the City Council on July 12, 2016 (City Council Resolution R-310595). The Downtown FEIR and CAP FEIR are both “Program EIRs” prepared in compliance with California Environmental Quality Act (CEQA) Guidelines Section 15168. The information contained in the Downtown FEIR and the CAP FEIR reflects the independent judgement of the City of San Diego as the Lead Agency and has been reviewed and considered by the decision maker before approving the project. Consistent with best practices suggested by CEQA Guidelines Section 15168, a Downtown 15168 Consistency Evaluation (“Evaluation”) has been completed for the project. The Evaluation concluded that the environmental impacts of the project were adequately addressed in the Downtown FEIR and CAP FEIR; that the project is within the scope of the development program described in the Downtown FEIR and CAP FEIR and is adequately described within both documents for the purposes of CEQA; and, that none of the conditions listed in CEQA Guidelines Section 15162 exist. Therefore, no further environmental documentation is required under CEQA.

NOW, THEREFORE, BE IT RESOLVED by the Planning Commission of the City of San Diego as follows:

That the Planning Commission adopts the following written Findings, dated July 19, 2018.

CENTRE CITY DEVELOPMENT PERMIT FINDINGS

- 1. The proposed development is consistent with the DCP, Centre City Planned District Ordinance (CCPDO), Land Development Code (LDC), and all other adopted plans and policies of the City of San Diego pertaining to the Centre City Planned District.*

The proposed development is consistent with the DCP, CCPDO, LDC, and all other adopted plans and policies of the City of San Diego pertaining to the CCPD as the development advances the goals and objectives of the DCP and CCPDO by:

- Provide for an overall balance of uses – employment, residential, cultural, government, and destination – as well as a full compendium of amenities and services.
- Provide a range of housing opportunities suitable for urban environments and accommodating a diverse population.
- Continue to promote the production of affordable housing in all of Downtown’s neighborhoods and districts.
- Increase the supply of rental housing affordable to low income persons.
- Foster a rich mix of uses in all neighborhoods, while allowing differences in emphasis on uses to distinguish between them.
- Foster redevelopment of Southeast with an urban mix of new residents and a variety of housing types, employees, artists, and conventioners, while preserving light industrial commercial service functions that serve downtown.
- Protect historical resources to communicate Downtown’s heritage.
- Encourage the rehabilitation and reuse of historical resources.

- Integrate historical resources into the Downtown fabric while achieving policies for significant development and population intensification.
- Incorporate elements of historical buildings in new projects to impart heritage.

SITE DEVELOPMENT PERMIT FINDINGS

General Findings – SDMC § 126.0505(a):

1. *The proposed development will not adversely affect the applicable land use plan;*

Historic Preservation is addressed in Chapter 9 of the DCP and states that locally designated resources are to be retained on-site whenever possible and that “Partial retention, relocation or demolition of a resource shall only be permitted through applicable City procedures,” that are outlined in SDMC Section 143.02 “Historical Resources Regulations.” Substantial alteration of a designated resource means demolition, destruction, relocation, new construction, or alteration activities that would impair the significance of a historical resource. Due to the proposed new construction on and around the historic resource, an SDP is required for the Project. The Planning Commission must make all of the Findings in SDMC Sections 126.0505(a) and 126.0505(i) before construction can occur. Therefore, the processing of this SDP is in compliance with and will not adversely affect the applicable land use plan.

The goals and policies of the DCP generally stipulate that SDRHR Listed buildings should be retained on-site and integrated into the Downtown fabric in a way that contributes to the achievement of the goals for significant development and population intensification. The proposed development will serve to add 45 residential units to a small lot, providing the desired density as well as much needed affordable housing, while at the same time, retaining (while modifying portions of) a historical resource on-site. It will thereby achieve the goals and policies of the DCP and not adversely affect the DCP.

2. *The proposed development will not be detrimental to the public health, safety, and welfare; and,*

The proposed development will not be detrimental to the public health, safety, and welfare through compliance with the applicable Development Regulations of the CCPDO and SDMC as well as the California Building Code.

3. *The proposed development will comply with the applicable provisions of the LDC*

The proposed project will comply with the applicable CCPDO Development Regulations pertaining to building setbacks, building heights, building bulk, building base, ground floor heights, and residential development regulations. It will also comply with the CCPDO’s Urban Design Regulations pertaining to building orientation, façade articulation, street level design, pedestrian entrances, transparency, blank walls, glass and glazing, rooftops, encroachments into public rights-of-way, and regulations pertaining to historical resources requiring an SDP. The two deviations from the development regulations regarding the

minimum commercial space depth and required parking are permitted as incentives earned through the provision of affordable housing units per the Affordable Housing Regulations of the SDMC.

Supplemental Findings – Historical Resources Deviation for Substantial Alteration of a Designated Historical Resource – SDMC § 126.0505(i):

1. *There are no feasible measures, including a less environmentally damaging alternative that can further minimize the potential adverse effects on the designated historical resource or historical district.*

The following four alternatives were evaluated for their respective margin on revenue (i.e. investment return) versus that of the Base Project:

- Alternative 1: House remains in same position and new building constructed behind the historic resource.
- Alternative 2: Reposition house to the front property line and new building constructed behind the historic resource.
- Alternative 3: Reposition house to the front property line and new building constructed behind and cantilevered over the historic resource.
- Alternative 4: Relocate historic resource off-site out of Downtown and new building constructed on full lot.

The evaluation concluded that the three alternatives that maintain the entire historic resource on-site are not economically viable due to the construction costs exceeding the capitalized value of the Project. Alternative 4 for relocation outside of the DCP area would result in the loss of the historical resource from the Downtown area which would result in the loss of context for the historic resource.

2. *The deviation is the minimum necessary to afford relief and accommodate the development and all feasible measures to mitigate for the loss of any portion of the historical resource have been provided by the applicant; and,*

The three Alternatives that maintain the entire historic resource on-site have been determined to be economically infeasible; therefore, the proposed substantial alteration to the historic resource is the minimum necessary to afford relief and accommodate the development of the site including the provision of affordable housing units. The modifications to the historic resource are the minimum necessary to retain it on-site and meet the goals and policies of the DCP. The Treatment Plan will mitigate to the extent feasible the impacts to the historic resource.

3. *The denial of the proposed development would result in economic hardship to the owner. For purposes of the finding, “economic hardship” means there is no reasonable beneficial use of a property and it is not feasible to derive a reasonable economic return from the property.*

An economic analysis prepared for the Project demonstrated that the Project is financially feasible. The three Alternatives evaluated that maintain the entire historic resource on-site would result in economic hardship to the owner, as they would result in a financial loss or in a project that that would not be able to be financed. Therefore, the strict application of the provisions of the historical resources regulations would deprive the property owner reasonable use of the site.

BE IT FURTHER RESOLVED that, based on the findings hereinbefore adopted by the Planning Commission, CCDP/SDP No. 2018-07 is hereby GRANTED by the Planning Commission to the referenced Owner/Permittee, in the form, exhibits, terms and conditions as set forth in CCDP/SDP No. 2018-07, a copy of which is attached hereto and made a part hereof.

James Alexander
Associate Planner
Civic San Diego

Adopted on: July 19, 2018

**PROJECT DATA SHEET
EZABELLE**

The following is a summary of the Project based on drawings dated January 23, 2018:

Site Area	4,200 SF
Base Minimum FAR	3.5
Base Maximum FAR	6.0
Maximum FAR with Amenity Bonuses	8.0
Maximum FAR with Affordable Housing Bonus	9.0
Proposed FAR	5.9
Above Grade Gross Floor Area	25,105 SF
FAR Bonuses Proposed	None
Stories / Height	7 stories / 77 feet
Amount of Commercial Space	1,722 SF
Housing Unit Summary	<u>#</u> <u>Size</u> <u>Rents</u>
Total Number of Housing Units	45
Studios	39 211-392 SF \$1,242 - \$1,415
Studios (30-50% AMI)	6 211-320 SF \$776
Number of Buildings over 45 Years Old	1 (designated historic resource)
Inclusionary Affordable Housing Compliance	Inclusionary Affordable Housing will be provided on-site with six affordable units.
Automobile Parking	
Total (Required / Proposed)	11 / 0*
Motorcycle Parking (Required / Proposed)	2 / 0*
Bicycle Parking (Required / Proposed)	9 / 0*
Common Indoor Space	
Required / Proposed	0 SF / 0 SF
Common Outdoor Open Space	
Required / Proposed	0 SF / 3,067 SF
Private Open Space (Balconies and Decks)	
Required / Proposed	0 / 15 balconies
Pet Open Space	
Required / Proposed	0 SF / 185 SF
Residential Storage	N/A
Assessor's Parcel Nos.	535-156-08-00
Sustainability	LEED Platinum

*Project is utilizing incentive under the Affordable Housing Regulations to waive required parking.

**DOWNTOWN
FINAL ENVIRONMENTAL IMPACT REPORT (Downtown FEIR)
CONSISTENCY EVALUATION
FOR THE
EZABELLE PROJECT**

JUNE 2018

Prepared for: Soheil Nakhshab
340 15th Avenue, Suite 1
San Diego, CA 92101

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DOWNTOWN FEIR CONSISTENCY EVALUATION

1. PROJECT TITLE: Ezabelle ("Project")

2. DEVELOPER: Nakhshab Development, Design, Inc.

3. PROJECT LOCATION AND SETTING: The Downtown Community Plan (DCP) area ("Downtown") includes approximately 1,500 acres within the metropolitan core of the City of San Diego, bounded by Laurel Street and Interstate 5 on the north; Interstate 5, Commercial Street, 16th Street, Sigsbee Street, Newton Avenue, Harbor Drive, and the extension of Beardsley Street on the east and southeast; and San Diego Bay on the south and west and southwest. The major north-south access routes to downtown are Interstate 5, State Route 163, and Pacific Highway. The major east-west access route to downtown is State Route 94. Surrounding areas include the community of Uptown and Balboa Park to the north, Golden Hill and Sherman Heights to the east, Barrio Logan and Logan Heights to the South and the City of Coronado to the west across San Diego Bay.

The 4,200 SF site is located at 454 13th Street on the west side of 13th Street between Island Avenue and J Street. The site currently contains a single-story residential building known as the Wright House that was constructed in 1881 and designated by the City of San Diego Historic Resources Board as a local historic resource on November 16, 2017 (HRB No. 1278). The site slopes downward slightly from west to east by approximately two feet. The Project site is in the Residential Emphasis land use district as designated in the CCPDO and subject to the Park Sun Access Overlay that requires at least 50% of the gross floor area be dedicated to employment uses, the Limited Vehicle Access overlay that controls the height of new development to the south and west of future park sites to ensure they maintain adequate sunlight, with which the Project complies.

4. PROJECT DESCRIPTION: This Project consists of a seven-story, 77 foot tall mixed-use development comprised of 45 dwelling units (DU), of which six are affordable, restricted to 30-50% of Area Median Income (AMI). All units are studios that range in size from 211 SF to 392 SF. The ground floor consists of leasable commercial space, 564 SF of which is within portions of the designated historic resource proposed to be retained on-site and incorporated into the Project. The Project does not include off-street parking. The Base Maximum Floor Area Ratio (FAR) is 6.0, with a maximum allowable FAR with Bonuses of 8.0. With affordable housing the maximum allowable is 9.0. The project has an FAR of 5.9.

5. CEQA COMPLIANCE: The DCP, CCPDO, Redevelopment Plan for the Centre City Redevelopment Project and related activities have been addressed by the following environmental documents, which were prepared prior to this Consistency Evaluation and are hereby incorporated by reference:

FEIR for the DCP, CCPDO, and 10th Amendment to the Redevelopment Plan for the Centre City Project (State Clearinghouse Number 2003041001, certified by the Redevelopment Agency (Resolution No. R-04001) and the San Diego City Council (City Council) (Resolution No. R-301265), with date of final passage on March 14, 2006.

Addendum to the Downtown FEIR for the 11th Amendment to the Redevelopment Plan for the Centre City Redevelopment Project, Amendments to the DCP, CCPDO, Marina Planned District Ordinance, and Mitigation, Monitoring and Reporting Program of the Downtown FEIR for the DCP, CCPDO, and the Redevelopment Plan for the Centre City Redevelopment Project certified by the Redevelopment Agency (Resolution No. R-04193) and by the City Council (Resolution No. R-302932), with date of final passage on July 31, 2007.

Second Addendum to the Downtown FEIR for the proposed amendments to the DCP, CCPDO, Marina Planned District Ordinance, and Mitigation, Monitoring and Reporting Program (MMRP) certified by the Redevelopment Agency (Resolution No. R-04508), with date of final passage on April 21, 2010.

Third Addendum to the Downtown FEIR for the RE District Amendments to the CCPDO certified by the Redevelopment Agency (Resolution No. R-04510), with date of final passage on April 21, 2010.

Fourth Addendum to the Downtown FEIR for the San Diego Civic Center Complex Project certified by the Redevelopment Agency (Resolution No. R-04544) with date of final passage on August 3, 2010.

Fifth Addendum to the Downtown FEIR for the Industrial Buffer Overlay Zone Amendments to the CCPDO certified by the City Council (Resolution No. R-308724) with a date of final passage on February 12, 2014.

Sixth Addendum to the Downtown FEIR for the India and Date Project certified by the City Council (Resolution No. R-309115) with a date of final passage on July 14, 2014.

The Final Supplemental Environmental Impact Report for the Downtown San Diego Mobility Plan certified by the City Council on June 21, 2016 (Resolution R-310561).

The City of San Diego FEIR for the Climate Action Plan (“CAP FEIR”) certified by the City Council on December 15, 2015, (City Council Resolution R-310176) which includes the Addendum to the CAP FEIR certified by the City Council on July 12, 2016 (City Council Resolution R-310595).

The Downtown FEIR and the CAP FEIR are “Program EIRs” prepared in compliance with California Environmental Quality Act (CEQA) Guidelines Section 15168. The aforementioned environmental documents are the most recent and comprehensive environmental documents pertaining to the proposed Project. The Downtown FEIR and subsequent addenda are available for review at the offices of the Civic San Diego (“CivicSD”) located at 401 B Street, Suite 400, San Diego, CA 92101. The CAP FEIR is available at the offices of the City of San Diego Planning Department located at 1010 Second Avenue, Suite 1200, San Diego, CA 92101.

This Downtown FEIR Consistency Evaluation (“Evaluation”) has been prepared for the Project in compliance with State CEQA and Local Guidelines. Under these Guidelines, environmental review for subsequent proposed actions is accomplished using the Evaluation process, as allowed

by Sections 15168 and 15180 of the State CEQA Guidelines. The Evaluation includes the evaluation criteria as defined in Section 15063 of the State CEQA Guidelines.

Under this process, an Evaluation is prepared for each subsequent proposed action to determine whether the potential impacts were anticipated in the Downtown FEIR and the CAP FEIR. No additional documentation is required for subsequent proposed actions if the Evaluation determines that the potential impacts have been adequately addressed in the CAP FEIR and the Downtown FEIR and subsequent proposed actions implement appropriate mitigation measures identified in the MMRP that accompanies the FEIR.

If the Evaluation identifies new impacts or a substantial change in circumstances, additional environmental documentation is required. The form of this documentation depends upon the nature of the impacts of the subsequent proposed action being proposed. Should a proposed action result in: a) new or substantially more severe significant impacts that are not adequately addressed in the Downtown FEIR or CAP FEIR, or b) there is a substantial change in circumstances that would require major revision to the Downtown FEIR or the CAP FEIR, or c) that any mitigation measures or alternatives previously found not to be feasible or not previously considered would substantially reduce or lessen any significant effects of the Project on the environment, a Subsequent or Supplemental Environmental Impact Report (EIR) would be prepared in accordance with Sections 15162 or 15163 of the State CEQA Guidelines (CEQA Statutes Section 21166).

If the lead agency under CEQA finds that pursuant to Sections 15162 and 15163, no new significant impacts will occur or no new mitigation will be required, the lead agency can approve the subsequent proposed action to be within the scope of the Project covered by the Downtown FEIR and CAP FEIR, and no new environmental document is required.

6. PROJECT-SPECIFIC ENVIRONMENTAL ANALYSIS: See attached Environmental Checklist and Section 10 *Evaluation of Environmental Impacts*.

7. MITIGATION, MONITORING AND REPORTING PROGRAM: As described in the Environmental Checklist and summarized in **Attachment A**, the following mitigation measures included in the MMRP, found in Volume 1.B.2 of the Downtown FEIR, will be implemented by the proposed Project:

AQ-B.1-1; HIST-A.1-1; HIST-A.1-2; HIST-B.1-1; PAL-A.1-1; LU-B.4-1; NOI-B.1-1; TRF-A.1.1-2; TRF-A.1.1-3, TRF-A2.2-1

8. DETERMINATION: In accordance with Sections 15168 and 15180 of the CEQA Guidelines, the potential impacts associated with future development within the DCP area are addressed in the Downtown FEIR prepared for the DCP, CCPDO, and the six subsequent addenda to the Downtown FEIR listed in Section 6 above, as well as the Final Supplemental EIR for the Downtown San Diego Mobility Plan and the CAP FEIR. These documents address the potential environmental effects of future development within the Centre City Redevelopment Project based on build out forecasts projected from the land use designations, density bonus, and other policies and regulations governing development intensity and density. Based on this analysis, the Downtown FEIR and its subsequent addenda and the CAP FEIR, as listed in

Section 6 above, concluded that development would result in significant impacts related to the following issues (mitigation and type of impact shown in parentheses):

Significant but Mitigated Impacts

- Air Quality: Construction Emissions (AQ-B.1) (D)
- Historical Resources: Impacts to Historical Resource (HIST-A.1) (C/D)
- Paleontology: Impacts to Significant Paleontological Resources (PAL-A.1) (D/C)
- Noise: Interior Traffic Level Increase on Grid Streets (NOI-B.1) (D/C)

Significant and Not Mitigated Impacts

- Air Quality: Mobile Source Emissions (AQ-A.1) (C)
- Historical Resources: Archeological (HIST-B.1) (D/C)
- Water Quality: Urban Runoff (WQ-A.1) (C)
- Land Use: Physical Changes Related to Transient Activity (LU-B.6) (C)
- Noise: Exterior Traffic Level Increase on Grid Streets (NOI-A.1) (C)
- Noise: Exterior Traffic Noise in Residential Development (NOI-C.1) (D/C)
- Traffic: Impact on Surrounding Streets (TRF-A.1) (C)
- Traffic: Impact on Freeway Ramps and Segments (TRF-A.2) (C)

In certifying the Downtown FEIR and approving the DCP, CCPDO, and 10th Amendment to the Redevelopment Plan, the City Council and Redevelopment Agency adopted a Statement of Overriding Considerations which determined that the unmitigated impacts were acceptable in light of economic, legal, social, technological or other factors including the following.

Overriding Considerations

1. Develop downtown as the primary urban center for the region
2. Maximize employment opportunities within the downtown area
3. Develop full-service, walkable neighborhoods linked to the assets downtown offers
4. Increase and improve parks and public spaces
5. Relieve growth pressure on outlying communities
6. Maximize the advantages of downtown's climate and waterfront setting
7. Implement a coordinated, efficient system of vehicular, transit, bicycle, and pedestrian traffic
8. Integrate historical resources into the new downtown plan
9. Facilitate and improve the development of business and economic opportunities located in the downtown area
10. Integrate health and human services into neighborhoods within downtown
11. Encourage a regular process of review to ensure that the Plan and related activities are best meeting the vision and goals of the Plan.

The proposed activity detailed and analyzed in this Evaluation are adequately addressed in the environmental documents noted above and there is no change in circumstance, substantial additional information, or substantial Project changes to warrant additional environmental review. Because the prior environmental documents adequately covered this activity as part of the previously approved Project, this activity is not a separate Project for purposes of review under CEQA pursuant to CEQA Guidelines Sections 15060(c)(3), 15180, and 15378(c).

SUMMARY OF FINDINGS: In accordance with Public Resources Code Sections 21166, 21083.3, and CEQA Guidelines Sections 15168 and 15183, the following findings are derived from the environmental review documented by this Evaluation and the Downtown FEIR and CAP FEIR as amended:

1. No substantial changes are proposed in the Centre City Redevelopment Project, or with respect to the circumstances under which the Centre City Redevelopment Project is to be undertaken as a result of the development of the proposed Project, which will require important or major revisions in the Downtown FEIR and the six subsequent addenda to the FEIR or with the CAP FEIR;
2. No new information of substantial importance to the Centre City Redevelopment Project has become available that shows the Project will have any significant effects not discussed previously in the Downtown FEIR or subsequent addenda to the Downtown FEIR or CAP FEIR; or that any significant effects previously examined will be substantially more severe than shown in the CAP FEIR and the Downtown FEIR or subsequent addenda to the FEIR; or that any mitigation measures or alternatives previously found not to be feasible or not previously considered would substantially reduce or lessen any significant effects of the Project on the environment;
3. No Negative Declaration, Subsequent EIR, or Supplement or Addendum to the CAP EIR and the Downtown FEIR, as amended, is necessary or required;
4. The proposed actions will have no significant effect on the environment, except as identified and considered in the CAP FEIR and the Downtown FEIR and subsequent addenda to the Downtown FEIR for the Centre City Redevelopment Project. No new or additional project-specific mitigation measures are required for this Project; and
5. The proposed actions would not have any new effects that were not adequately covered in the CAP FEIR and Downtown FEIR or addenda to the Downtown FEIR, and therefore, the proposed Project is within the scope of the program approved under the CAP FEIR and Downtown FEIR and subsequent addenda listed in Section 6 above.

CivicSD, the implementing body for the City of San Diego, administered the preparation of this Evaluation:



James Alexander, Associate Planner, CivicSD
Lead Agency Representative/Preparer

6/4/18

Date

ENVIRONMENTAL CHECKLIST

10. EVALUATION OF ENVIRONMENTAL IMPACTS

This environmental checklist evaluates the potential environmental effects of the proposed Project consistent with the significance thresholds and analysis methods contained in the CAP FEIR and the Downtown FEIR for the DCP, CCPDO, and Redevelopment Plan for the Centre City Project Area. Based on the assumption that the proposed activity is adequately addressed in the Downtown FEIR and CAP FEIR, the following table indicates how the impacts of the proposed activity relate to the conclusions of the Downtown FEIR and CAP FEIR. As a result, the impacts are classified into one of the following categories:

- Significant and Not Mitigated (SNM)
- Significant but Mitigated (SM)
- Not Significant (NS)

The checklist identifies each potential environmental effect and provides information supporting the conclusion drawn as to the degree of impact associated with the proposed Project. As applicable, mitigation measures from the Downtown FEIR and CAP FEIR are identified and are summarized in **Attachment A** to this Evaluation. Some of the mitigation measures are plan-wide and not within the control of the proposed Project. Other measures, however, are to be specifically implemented by the proposed Project. Consistent with the Downtown FEIR and CAP FEIR analysis, the following issue areas have been identified as Significant and Not Mitigated even with inclusion of the proposed mitigation measures, where feasible:

- Air Quality: Mobile Source Emissions (AQ-A.1) (C)
- Historical Resources: Archeological (HIST-B.1) (D/C)
- Water Quality: Urban Runoff (WQ-A.1) (C)
- Land Use: Physical Changes Related to Transient Activity (LU-B.6) (C)
- Noise: Exterior Traffic Level Increase on Grid Streets (NOI-A.1) (C)
- Noise: Exterior Traffic Noise in Residential Development (NOI-C.1) (D/C)
- Traffic: Impact on Surrounding Streets (TRF-A.1) (C)
- Traffic: Impact on Freeway Ramps and Segments (TRF-A.2) (C).

The following Overriding Considerations apply directly to the proposed Project:

1. Develop downtown as the primary urban center for the region
2. Develop full-service, walkable neighborhoods linked to the assets downtown offers
3. Relieve growth pressure on outlying communities
4. Integrate historical resources into the new downtown plan
5. Facilitate and improve the development of business and economic opportunities located in the downtown area

	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
1. AESTHETICS/VISUAL QUALITY:						
<p>(a) <i>Substantially disturb a scenic resource, vista or view from a public viewing area, including a State scenic highway or view corridor designated by the DCP?</i></p> <p>Views of scenic resources including San Diego Bay, San Diego-Coronado Bay Bridge, Point Loma, Coronado, Petco Park, and the downtown skyline are afforded by the public viewing areas within and around the downtown and along view corridor streets within the planning area. The CCPDO includes several requirements that reduce a project's impact on scenic vistas. These include view corridor setbacks on specific streets to maintain views and controls building bulk by setting limits on minimum tower spacing, street wall design, maximum lot coverage, and building dimensions. The Project site is not located within any designated view corridor. The site itself does not possess any significant scenic resources that could be impacted by the proposed Project therefore impacts to on-site scenic resources are not significant. Impacts associated with scenic vistas would be similar to the DCP FEIR and would not be significant.</p>					X	X
<p>(b) <i>Substantially incompatible with the bulk, scale, color and/or design of surrounding development?</i></p> <p>The bulk, scale, and design of the Project would be compatible with existing and planned developments in the East Village neighborhood. Development of the site would improve the area by providing a new, modern building on a currently underutilized site. The Project would utilize high quality materials and contemporary design sensitive to the character of the surrounding neighborhood. Additionally, a variety of</p>					X	X

	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
mid, low and high-rise buildings are located within the vicinity of the Project site and the scale of the proposed Project would be consistent with that of surrounding buildings. Therefore, project-level and cumulative impacts associated with this issue would not occur.						
<p>(c) <i>Substantially affect daytime or nighttime views in the area due to lighting?</i></p> <p>The proposed project would not involve a substantial amount of exterior lighting or include materials that would generate substantial glare. Furthermore, outdoor lighting that would be incorporated into the proposed project would be shielded or directed away so that direct light or glare does not adversely impact adjacent land uses. The City's Light Pollution Law (SDMC Section 101.1300 et seq.) also protects nighttime views (e.g., astronomical activities) and light-sensitive land uses from excessive light generated by development in the downtown area. The proposed project's conformance with these requirements would ensure that direct and cumulative impacts associated with this issue are not significant.</p>					X	X
2. AGRICULTURAL RESOURCES:						
<p>(a) <i>Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) to non-agricultural use?</i></p> <p>The DCP Area is an urban downtown environment that does not contain land designated as prime agricultural soil by the Soils Conservation Service. In addition, it does not contain prime farmland designated by the California Department of Conservation. Therefore, no impact to agricultural</p>					X	X

	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
resources would occur.						
<p><i>(b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?</i></p> <p>The DCP Area does not contain, nor is it near, land zoned for agricultural use or land subject to a Williamson Act Contract pursuant to Section 512101 of the California Government Code. Therefore, impacts resulting from conflicts with existing zoning for agricultural use or a Williamson Act Contract would not occur.</p>					X	X

	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
3. AIR QUALITY:						
<p>(a) <i>Conflict with or obstruct implementation of an applicable air quality plan, including the County's Regional Air Quality Strategies (RFS) or the State Implementation Plan?</i></p> <p>The proposed Project site is located within the San Diego Air Basin, which is under the jurisdiction of the San Diego Air Pollution Control District (SDAPCD). The San Diego Air Basin is designated by state and federal air quality standards as nonattainment for ozone and particulate matter (PM) less than 10 microns (PM10) and less than 2.5 microns (PM 2.5) in equivalent diameter. The SDAPCD has developed a Regional Air Quality Strategy (RAQS) to attain the state air quality standards for ozone. The proposed Project is consistent with the land use and transit-supportive policies and regulations of the DCP and CCPDO; which are in accordance with those of the RAQS. Therefore, the proposed Project would not conflict with, but would help implement, the RAQS with its compact, high intensity land use and transit-supportive design. Therefore, no impact to the applicable air quality plan would occur.</p>					X	X
<p>(b) <i>Expose sensitive receptors to substantial air contaminants including, but not limited to, criteria pollutants, smoke, soot, grime, toxic fumes and substances, particulate matter, or any other emissions that may endanger human health?</i></p> <p>The Project could involve the exposure of sensitive receptors to substantial air contaminants during short-term construction activities and over the long-term operation of the Project. Construction activities associated with the Project could result in potentially significant impacts related to the exposure of sensitive</p>			X			X

	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
<p>receptors to substantial emissions of particulate matter. The potential for impacts to sensitive receptors during construction activities would be mitigated to below a level of significance through compliance with the City’s mandatory standard dust control measures and the dust control and construction equipment emission reduction measures required by FEIR Mitigation Measure AQ-B.1-1 (Attachment A).</p> <p>The Project could also involve the exposure of sensitive receptors to air contaminants over the long-term operation of the Project, such as carbon monoxide exposure (commonly referred to as CO “hot spots”) due to traffic congestion near the Project site. However, the FEIR concludes that development within the DCP Area would not expose sensitive receptors to significant levels of any of the substantial air contaminants. Since the land use designation of the proposed development does not differ from the land use designation assumed in the FEIR analysis, the Project would not expose sensitive receptors to substantial air contaminants beyond the levels assumed in the FEIR. Additionally, the Project is not located close enough to any industrial activities to be impacted by any emissions potentially associated with such activities. Therefore, impacts associated with this issue would not be significant. Project impacts associated with the generation of substantial air contaminants are discussed below in Section 3.c.</p>						
<p>(c) <i>Generate substantial air contaminants including, but not limited to, criteria pollutants, smoke, soot, grime, toxic fumes and substances, particulate matter, or any other emissions that may endanger human health?</i></p> <p>Implementation of the Project could result in potentially adverse air quality impacts related to the following air emission generators: construction and mobile-sources.</p>		X	X			

	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
<p>Site preparation activities and construction of the Project would involve short-term, potentially adverse impacts associated with the creation of dust and the generation of construction equipment emissions. The clearing, grading, excavation, and other construction activities associated with the Project would result in dust and equipment emissions that, when considered together, could endanger human health. Implementation of Downtown FEIR Mitigation Measure AQ-B.1-1 (see Attachment A) would reduce dust and construction equipment emissions generated during construction of the Project to a level below significance.</p> <p>The air emissions generated by automobile trips associated with the Project would not exceed air quality significance standards established by the San Diego Air Pollution Control District. However, the Project's mobile source emissions, in combination with dust generated during the construction of the Project, would contribute to the significant and unmitigated cumulative impact to air quality identified in the Downtown FEIR. No uses are proposed that would significantly increase stationary-source emissions in Downtown; therefore, impacts from stationary sources would be not significant.</p>						

	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
4. BIOLOGICAL RESOURCES:						
<p>(a) <i>Substantially effect, either directly or through habitat modifications, any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by local, state or federal agencies?</i></p> <p>Due to the highly urbanized nature of the DCP Area, there are no sensitive plants or animal species, habitats, or wildlife migration corridors. In addition, the ornamental trees and landscaping included in the Project are considered of no significant value to the native wildlife in their proposed location. Therefore, no impact associated with this issue could occur.</p>					X	X
<p>(b) <i>Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations by local, state or federal agencies?</i></p> <p>As identified in the FEIR, the DCP Area is not within a sub-region of the San Diego County Multiple Species Conservation Program (MSCP). Therefore, impacts associated with substantial adverse effects on riparian habitat or other sensitive natural communities identified in local or regional plans, policies, and regulations by local, state or federal agencies would not occur.</p>					X	X
5. GEOLOGY AND SOILS:						
<p>(a) <i>Substantial health and safety risk associated with seismic or geologic hazards?</i></p> <p>The proposed Project site is in a seismically active region. There are no known active or potentially active faults located on the Project site. However, the Project site is located within the Rose Canyon Fault</p>					X	X

	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
<p>Zone, which is designated as an Earthquake Fault Zone by the California Department of Mines and Geology. Within this fault zone is the Downtown Graben and San Diego Fault and a seismic event on this fault could cause significant ground shaking on the proposed Project site. The site also lies with the Alquist-Priolo Earthquake Fault Zone (A-P Zone) established by the California Geologic Survey. Therefore, the potential exists for substantial health and safety risks on the Project site associated with a seismic hazard.</p> <p>Michael W. Hart, Engineering Geologist, prepared a Geologic Study in November 2017 and Christian Wheeler Engineering prepared a Geotechnical Investigation in December 2017 for the Project. Both reports conclude that the subject site is not traversed by an active or potentially active fault. Therefore, the potential for surface rupture from displacement or fault movement beneath the proposed improvements is considered to be low.</p> <p>Although the potential for geologic hazards (landslides, liquefaction, slope failure, and seismically-induced settlement) is considered low due to the site's moderate to non-expansive geologic structure, such hazards could nevertheless occur. Conformance with, and implementation of, all seismic-safety development requirements, including all applicable requirements of the Alquist-Priolo Zone Act, the seismic design requirements of the International Building Code (IBC), the City of San Diego Notification of Geologic Hazard procedures, and all other applicable requirements would ensure that the potential impacts associated with seismic and geologic hazards are not significant.</p>						

	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
6. GREENHOUSE GAS EMISSIONS:						
<p>(a) <i>Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?</i></p> <p>The DCP provides for the growth and buildout of Downtown. The City's CAP FEIR analyzed greenhouse gas ("GHG") emissions on a citywide basis – inclusive of the anticipated assumptions for the growth and buildout of Downtown. The City's CAP outlines measures that would support substantial progress towards the City's 2035 GHG emissions reduction targets, which are intended to keep the City in-line to achieve its share of 2050 GHG reductions.</p> <p>The CAP Consistency Checklist was adopted to uniformly implement the CAP for project-specific analyses of GHG emission impacts. The Project has been analyzed against the CAP Consistency Checklist and based on this analysis, it has been determined that the Project would be consistent with the CAP and would not contribute to cumulative GHG emissions that would be inconsistent with the CAP. As such, the Project would be consistent with the anticipated growth and buildout assumptions of both the DCP and the CAP. Therefore, this impact is considered not significant.</p>					X	X
<p>(b) <i>Conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gas?</i></p> <p>As stated above in Section 6.a., construction and operation of the proposed Project would not result in a significant impact related to GHG emissions on the environment. The Project is consistent with</p>					X	X

	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
the City's CAP and growth assumptions under the DCP as stated in Section 6.a. Additionally, the Project would be consistent with the recommendations within Policy CE-A.2 of the City of San Diego's General Plan Conservation Element. Therefore, the Project does not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases. This impact is considered not significant.						
7. HAZARDS AND HAZARDOUS MATERIALS:						
<p>(a) <i>Substantial health and safety risk related to onsite hazardous materials?</i></p> <p>The Downtown FEIR states that contact with, or exposure to, hazardous building materials, soil and ground water contaminated with hazardous materials, or other hazardous materials could adversely affect human health and safety during short-term construction or long term operation of a development. The Project is subject to federal, state, and local agency regulations for the handling of hazardous building materials and waste. Compliance with all applicable requirements of the County of San Diego Department of Environmental Health and federal, state, and local regulations for the handling of hazardous building materials and waste would ensure that potential health and safety impacts caused by exposure to on-site hazardous materials are not significant during short term, construction activities. In addition, herbicides and fertilizers associated with the landscaping of the Project could pose a significant health risk over the long term operation of the Project. However, the Project's adherence to existing mandatory federal, state, and local regulations controlling these materials would ensure that long-</p>					X	X

	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
term health and safety impacts associated with on-site hazardous materials over the long term operation of the Project are not significant.						
<p><i>(b) Be located on or within 2,000 feet of a site that is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would it create a significant hazard to the public or the environment?</i></p> <p>The Project is not located on or within 2,000 feet of a site on the State of California Hazardous Waste and Substances Sites List; however, there are sites within 2,000 feet of the Project site that are listed on the County of San Diego's Site Assessment Mitigation (SAM) Case Listing. The Downtown FEIR states that significant impacts to human health and the environment regarding hazardous waste sites would be avoided through compliance with mandatory federal, state, and local regulations as described in Section 7.a above. Therefore, the Downtown FEIR states that no mitigation measures would be required.</p>					X	X
<p><i>(c) Substantial safety risk to operations at San Diego International Airport?</i></p> <p>According to the Airport Land Use Compatibility Plan for San Diego International Airport (SDIA), the entire downtown planning area is located within the SDIA Airport Influence Area. The FEIR identifies policies that regulate development within areas affected by Lindbergh Field including building heights, use and intensity limitations, and noise sensitive uses. The Project does not exceed the intensity of development assumed under the FEIR, nor does it include components that would in any way violate or impede adherence to these policies, impacts related to the creation of substantial safety risks at San Diego</p>					X	X

	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
International Airport would not be significant, consistent with the analysis in the FEIR. Therefore, there are no potential direct or cumulative impacts related to this issue.						
<p><i>(d) Substantially impair implementation of an adopted emergency response plan or emergency evacuation plan?</i></p> <p>The Project does not propose any features that would affect an emergency response or evacuation plan. Therefore, no impact associated with this issue is anticipated.</p>					X	X
8. HISTORICAL RESOURCES:						
<p><i>(a) Substantially impact a significant historical resource, as defined in § 15064.5?</i></p> <p>The project site contains the historic Wright House, which is a locally designated historic resource in the San Diego Register (DCP FEIR, p. 5.3-8). The Wright House is currently vacant. The historic resource will undergo a complete restoration per the approved Treatment Plan. The Project proposes to retain portions of the historic resource on-site and incorporate them into the design of the new construction, resulting in a substantial alteration of the historic resource. The substantial alteration consists of the removal of three facades and relocation onto a new concrete structure at the front of the property, and constructing six levels of residential units directly above the building, setback 10'-3" from the bay windows of the front façade.</p> <p>This is consistent with DCP Goals 9.1-G-1, "Protect historical resources to communicate Downtown's heritage," 9.1-G-2, "Encourage the rehabilitation and</p>			X	X		

	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
<p>reuse of historical resources,” and 9.2-G-1, “Integrate historical resources into the Downtown fabric while achieving policies for significant development and population intensification,” and with DCP Policies 9.2-P-1, “Incorporate elements of historical buildings in new projects to impart heritage,” and 9.2-P-3, “Promote the adaptive reuse of intact buildings (designated or not) and/or significant elements, as a cultural and suitability goal.”</p> <p>DCP FEIR Mitigation Measure HIST-A.1-1 requires compliance with Chapter 14, Article 3, Division 2 of the SDMC, which regulates historic resources. Mitigation Measure HIST-A.1-2 requires the applicant to submit a Treatment Plan for retained historic resources for review and approval. Implementation of SDMC §143.0201 et seq., as required by Mitigation Measures HIST-A.1-1 and HIST-A.1-2 (Attachment A), will further ensure that the inclusion of the Wright House will not significantly impact the historic resource.</p> <p>The Project would include substantial alterations to the Wright House that may be approved through the SDP review and approved by the City in conformance with the City’s Historical Resources Regulations as provided in Mitigation Measure HIST-A.1-1 and HIST-A.1-2.</p>						
<p><i>(b) Substantially impact a significant archaeological resource pursuant to § 15064.5, including the disturbance of human remains interred outside of formal cemeteries?</i></p> <p>According to the Downtown FEIR, the likelihood of encountering archaeological resources is greatest for projects that include grading and/or excavation of areas on which past grading and/or excavation</p>	X	X				

	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
activities have been minimal (e.g., surface parking lots). Since archaeological resources have been found within inches of the ground surface in Downtown, even minimal grading activities can impact these resources. In addition, the likelihood of encountering subsurface human remains during construction and excavation activities, although considered low, is possible. Thus, the excavation, demolition, and surface clearance activities associated with development of the Project and the level of subterranean parking could have potentially adverse impacts to archaeological resources, including buried human remains. Implementation of Downtown FEIR Mitigation Measure HIST-B.1-1 , (see Attachment A) would minimize, but not fully mitigate, these potential impacts. Since the potential for archaeological resources and human remains on the Project site cannot be confirmed until grading is conducted, the exact nature and extent of impacts associated with the proposed Project cannot be predicted. Consequently, the required mitigation may or may not be sufficient to reduce these direct project-level impacts to below a level of significance. Therefore, project-level impacts associated with this issue remain potentially significant and not fully mitigated, consistent with the analysis of the Downtown FEIR. Furthermore, project-level significant impacts to important archaeological resources would contribute to the potentially significant and unmitigated cumulative impacts identified in the Downtown FEIR.						
<p><i>(c) Substantially impact a unique paleontological resource or site or unique geologic feature?</i></p> <p>The Project site is underlain by the San Diego Formation and Bay Point Formation, which has high paleontological resource potential. The Downtown FEIR concludes that development would have</p>			X	X		

	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
potentially adverse impacts to paleontological resources if grading and/or excavation activities are conducted beyond a depth of 1-3 feet. The Project's proposal for a level of subterranean parking would involve excavation beyond the FEIR standard, resulting in potentially significant impacts to paleontological resources. Implementation of Downtown FEIR Mitigation Measure PAL-A.1-1 (see Attachment A) would ensure that the Project's potentially direct impacts to paleontological resources are not significant. Furthermore, the Project would not impact any resources outside of the Project site. The mitigation measures for direct impacts fully mitigate for paleontological impacts, therefore, the Project's contribution to cumulative impacts to paleontological resources would be significant but mitigated because the same measures that mitigate direct impacts would also mitigate for any cumulative impacts.						
9. HYDROLOGY AND WATER QUALITY:						
<p>(a) <i>Substantially degrade groundwater or surface water quality?</i></p> <p>The Project's construction and grading activities may involve soil excavation at a depth that could surpass known groundwater levels, which would indicate that groundwater dewatering might be required. Compliance with the requirements of either (1) the San Diego Regional Water Quality Control Board under a National Pollution Discharge Elimination system general permit for construction dewatering (if dewatering is discharged to surface waters), or (2) the City of San Diego Metropolitan Wastewater Department (if dewatering is discharged into the City's sanitary sewer system under the Industrial Waste Pretreatment Program), and (3) the mandatory requirements controlling the treatment and disposal of</p>		X			X	

	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
<p>contaminated dewatered groundwater would ensure that potential impacts associated with construction dewatering and the handling of contaminated groundwater are not significant. In addition, Best Management Practices (BMPs) required as part of the local Storm Water Pollution Prevention Plan (SWPPP) would ensure that short-term water quality impacts during construction are not significant. The proposed Project would result in hard structure areas and other impervious surfaces that would generate urban runoff with the potential to degrade groundwater or surface water quality. However, implementation of BMPs required by the local Standard Urban Storm water Mitigation Program (SUSMP) and Storm water Standards would reduce the Project's long-term impacts. Thus, adherence to the state and local water quality controls would ensure that direct impacts to groundwater and surface water quality would not be significant.</p> <p>Despite not resulting in direct impacts to water quality, the Downtown FEIR found that the urban runoff generated by the cumulative development in the downtown would contribute to the existing significant cumulative impact to the water quality of San Diego Bay. No mitigation other than adherence to existing regulations has been identified in the Downtown FEIR to feasibly reduce this cumulative impact to below a level of significance. Consistent with the Downtown FEIR, the Project's contribution to the cumulative water quality impact would remain significant and unmitigated.</p>						
<p><i>(b) Substantially increase impervious surfaces and associated runoff flow rates or volumes?</i></p> <p>The Project site is currently developed and covered with impervious surfaces. Implementation of the</p>					X	X

	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
Project would not substantially increase the runoff volume entering the storm drain system. The Downtown FEIR found that implementation of the DCP would not result in a substantial increase in impervious surfaces within Downtown because the area is a highly urbanized area paved with pervious surfaces and very little vacant land (approximately 3 percent of the planning area). Redevelopment of downtown is therefore anticipated to replace impervious surfaces that already exist and development of the small number of undeveloped sites would not result in a substantial increase in impermeable surface area or a significant impact on the existing storm drain system. The Project is also required to comply with the City of San Diego BMPs required as part of the local SWPPP. The Project incorporates a variety of pervious surfaces (such as landscape areas and open spaces), as well as features designed to utilize storm water. Implementation of these features is encouraged by the DCP as they capture rain water and reduce surface volume entering the storm drain system. Therefore, impacts associated within this issue are not significant. (Impacts associated with the quality of urban runoff are analyzed in Section 9a.)						
<p><i>(c) Substantially impede or redirect flows within a 100-year flood hazard area?</i></p> <p>The Project site is not located within a 100-year floodplain. Similarly, the Project would not affect off-site flood hazard areas, as no 100-year floodplains are located downstream. Therefore, impacts associated with these issues are not significant.</p>					X	X
<p><i>(d) Substantially increase erosion and sedimentation?</i></p> <p>The potential for erosion and sedimentation could</p>					X	X

	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
increase during the short-term during site preparation and other construction activities. As discussed in the FEIR, the proposed Project's compliance with regulations mandating the preparation and implementation of a SWPPP would ensure that impacts associated with erosion and sedimentation are not significant.						
10. LAND USE AND PLANNING:						
<p><i>(a) Physically divide an established community?</i></p> <p>The Project does not propose any features or structures that would physically divide an established community. Impacts associated with this issue would not occur.</p>					X	X
<p><i>(b) Substantially conflict with the City's General Plan and Progress Guide, Downtown Community Plan or other applicable land use plan, policy, or regulation?</i></p> <p>The land use designation for the site is Residential Emphasis (RE), which accommodates primarily residential development. Small-scale businesses, offices, services, and ground-floor active commercial uses are allowed, subject to size and area limitations. Within the RE District, at least 80% of the gross floor area must be occupied by residential uses. Non-residential uses may occupy no more than 20% of the gross floor area. The Project complies with the provisions of the RE District.</p> <p>The Project is located in the Park Sun Access Overlay, which ensures adequate sunlight to future park sites designated in the DCP by controlling the height of new development to the south and west as illustrated in Figure M of the CCPDO. The Project complies with</p>					X	X

	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
<p>the provisions of this Overlay.</p> <p>The Project would not conflict with other applicable land use plans, policies, or regulations. The Project complies with the goals and policies of the DCP and will meet all applicable development standards of the CCPDO and SDMC. Therefore, no significant direct or cumulative impacts associated with an adopted land use plan would occur.</p>						
<p><i>(b) Substantial incompatibility with surrounding land uses?</i></p> <p>Sources of land use incompatibility include lighting, industrial activities, shading, and noise. The Project would not result in or be subject to, adverse impacts due to substantially incompatible land uses. Compliance with the City's Light Pollution Ordinance would ensure that land use incompatibility impacts related to the Project's emission of, and exposure to, lighting are not significant. In addition, the Downtown FEIR concludes that existing mandatory regulations addressing land use compatibility with industrial activities would ensure that residents of, and visitors to, the Project are not subject to potential land use incompatibilities (potential land use incompatibilities resulting from hazardous materials and air emissions are evaluated elsewhere in this evaluation).</p> <p>Potentially significant impacts associated with the Project's incompatibility with traffic noise on adjacent grid streets are discussed in Sections 12.b and 12.c. No impacts associated with incompatibility with surrounding land use would occur.</p>					X	X

	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
<p>(c) <i>Substantially impact surrounding communities due to sanitation and litter problems generated by transients displaced by downtown development?</i></p> <p>Although not expected to be a substantial direct impact of the Project because substantial numbers of transients are not known to congregate on-site, the Project, in tandem with other Downtown development activities, would have a significant cumulative impact on surrounding communities resulting from sanitation problems and litter generation by transients who are displaced from Downtown into surrounding canyons and vacant land as discussed in the Downtown FEIR. Continued support of Homeless Outreach Teams (HOTs) and similar transient outreach efforts would reduce, but not fully mitigate, the adverse impacts to surrounding neighborhoods caused by the transient relocation. Therefore, the Project would result in cumulatively significant and not fully mitigated impacts to surrounding neighborhoods.</p>		X			X	
11. MINERAL RESOURCES:						
<p>(a) <i>Substantially reduce the availability of important mineral resources?</i></p> <p>The Downtown FEIR states that the viable extraction of mineral resources is limited in the DCP Area due to its urban nature and the fact that the area is not recognized for having high mineral resource potential. Therefore, no impact associated with this issue would occur.</p>					X	X
12. NOISE:						
<p>(a) <i>Substantial noise generation?</i></p> <p>The Project would not result in substantial noise generation from any stationary sources over the long-</p>		X			X	

	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
term. Short-term construction noise impacts would be avoided by adherence to construction noise limitations imposed by the City's Noise Abatement and Control Ordinance. The Downtown FEIR defines a significant long-term traffic noise increase as an increase of at least 3.0 dB (A) CNEL for street. The Downtown FEIR identified nine street segments in Downtown that would be significantly impacted as a result of traffic generation; however, none of these identified segments are in the direct vicinity of the Project site. Nevertheless, automobile trips generated by the project, would, in combination with other development in Downtown significantly increase noise on several street segments resulting in cumulatively significant noise impacts. The Downtown FEIR concludes that there are no feasible mitigation measures available to reduce the significant noise increase in noise on affected roadways and this impact remains significant and unavoidable.						
<p><i>(b) Substantial exposure of required outdoor residential open spaces or public parks and plazas to noise levels (e.g. exposure to levels exceeding 65 dBA CNEL)?</i></p> <p>The Project is a residential development with approximately 45 DU. Under the CCPDO, developments with 50 DU or less are not required to contain a common outdoor open space area. However, this Project proposes an approximately 3,000 SF rooftop outdoor common space that includes lounge areas, a communal barbeque, and a pet relief area.</p>					X	X
<p><i>(c) Substantial interior noise within habitable rooms (e.g. levels in excess of 45 dBA CNEL)?</i></p> <p>Traffic noise levels could exceed 65 dB (A) CNEL in the Project area and interior noise levels within habitable rooms facing adjacent streets could experience interior noise levels in excess of 45 dB (A)</p>			X			X

	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
CNEL (the standard set forth in the DCP FEIR). However, adherence to Title 24 of the California Building Code and implementation of Mitigation Measure NOI-B.1-1 would reduce interior noise levels to below 45 dB (A). Therefore, direct project-level impacts associated with this issue would be mitigated to a level less than significant.						
13. POPULATION AND HOUSING:						
<p><i>(a) Substantially induce population growth in an area?</i></p> <p>The Downtown FEIR concludes that build-out of Downtown would not induce substantial population growth that results in adverse physical changes. The Project is consistent with the DCP and CCPDO and does not exceed those analyzed throughout the Downtown FEIR. Therefore, project-level and cumulative impacts associated with this issue are not significant.</p>					X	X
<p><i>(b) Substantial displacement of existing housing units or people?</i></p> <p>The Project site is currently occupied by the vacant Wright House. No existing housing units are on-site or would be affected by the development or operation of the proposed project. Overall displacement of existing housing units or persons would not occur as a result of the proposed project, and the construction of replacement housing would not be required. Therefore, no direct or cumulative impacts associated with this issue would occur.</p>					X	X
14. PUBLIC SERVICES AND UTILITIES:						
<p><i>(a) Substantial adverse physical impacts associated with the provision of new schools?</i></p>					X	X

	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
<p>The population of school-aged children attending public schools is dependent on current and future residential development. In and of itself, the Project would not generate a sufficient number of students to warrant construction of a new school facility. However, the FEIR concludes that the additional student population anticipated at build out of Downtown would require the construction of at least one additional school, and that additional capacity could potentially be accommodated in existing facilities. The specific future location of new facilities is unknown at the present time. Pursuant to Section 15145 of CEQA, analysis of the physical changes in Downtown, which may occur from future construction of these public facilities, would be speculative and no further analysis of their impacts is required. Construction of any additional schools would be subject to CEQA. Environmental documentation prepared pursuant to CEQA would identify potentially significant impacts and appropriate mitigation measures. Therefore, implementation of the Project would not result in direct or cumulative impacts associated with this issue.</p>						
<p><i>(b) Substantial adverse physical impacts associated with the provision of new libraries?</i></p> <p>The FEIR concludes that, cumulatively, development in Downtown would generate the need for a new Central Library which was completed in 2013 and possibly several smaller libraries in Downtown. In and of itself, the proposed Project would not generate additional demand necessitating the construction of new library facilities. However, according to the analysis in the Downtown FEIR, future development projects are considered to contribute to the cumulative need for new library facilities Downtown identified in the Downtown FEIR. Nevertheless, the specific future location of these facilities is unknown at present.</p>					X	X

	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
Pursuant to Section 15145 of CEQA, analysis of the physical changes in Downtown, which may occur from future construction of these public facilities, would be speculative and no further analysis of their impacts is required. Construction of any additional library facilities would be subject to CEQA. Environmental documentation prepared pursuant to CEQA would identify potentially significant impacts and appropriate mitigation measures. Therefore, approval of the Project would not result in direct or cumulative impacts associated with this issue.						
<p>(c) <i>Substantial adverse physical impacts associated with the provision of new fire protection/ emergency facilities?</i></p> <p>The Project would not generate a level of demand for fire protection/emergency facilities beyond the level assumed by the Downtown FEIR. The Fire Station No. 2 (Bayside) facility is nearing completion in the Little Italy neighborhood and the San Diego Fire Department is in the process of identifying sites for new fire stations in Downtown. Pursuant to Section 15145 of the California Environmental Quality Act (CEQA), analysis of the physical changes in Downtown that may occur from future construction of fire station facilities would be speculative and no further analysis of the impact is required. Environmental documentation prepared pursuant to CEQA would identify significant impacts and appropriate mitigation measures for any future fire station facilities.</p>					X	X
<p>(d) <i>Substantial adverse physical impacts associated with the provision of new law enforcement facilities?</i></p> <p>The Downtown FEIR analyzes impacts to law enforcement service resulting from the cumulative</p>					X	X

	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
development of Downtown and concludes the construction of new law enforcement facilities would not be required. Since the land use designation of the proposed development is consistent with the land use designation assumed in the Downtown FEIR analysis, the Project would not generate a level of demand for law enforcement facilities beyond the level assumed by the Downtown FEIR. However, the need for a new facility could be identified in the future. Pursuant to Section 15145 of the California Environmental Quality Act (CEQA), analysis of the physical changes in the downtown planning area that may occur from the future construction of law enforcement facilities would be speculative and no future analysis of their impacts would be required. However, construction of new law enforcement facilities would be subject to CEQA. Environmental documentation prepared pursuant to CEQA would identify potentially significant impacts and appropriate mitigation measures.						
<p><i>(e) Substantial adverse physical impacts associated with the provision of new water transmission or treatment facilities?</i></p> <p>The Public Utilities Department provides water service to the downtown and delivers more than 200,000 million acre-feet annually to over 1.3 million residents. During an average year the Department's water supply is made up of 10 to 20 percent of local rainfall, with the remaining amount imported from regional water suppliers including the San Diego County Water Authority (SDWA) and the Metropolitan Water District (MWD). Potable water pipelines are located underneath the majority of downtown's streets mimicking the above-ground street grid pattern.</p>					X	X

	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
<p>According to the DCP FEIR, in the short term, planned water supplies and transmission or treatment facilities are adequate for development of the DCP. Water transmission infrastructure necessary to transport water supply to the downtown area is already in place. Build out of the 2006 DCP, however, would generate more water demand than planned for in the adopted 2010 UWMP. This additional demand was not considered in SDCWA's Urban Water Management Plan (UWMP). To supplement this and meet the additional need, SDCWA indicates in the DCP FEIR that it will increase local water supply (from surface water, water recycling, groundwater, and seawater desalination) to meet the additional demand resulting from build out of the DCP.</p> <p>California Water Code Section 10910 requires projects analyzed under CEQA to assess water demand and compare that finding to the jurisdiction's projected water supply.</p> <p>Since the proposed project does not meet the requirements of SB 610 and is consistent with the Downtown Community Plan, direct and cumulative impacts related to water supply would be considered not significant.</p>						
<p>(f) <i>Substantial adverse physical impacts associated with the provision of new storm water facilities?</i></p> <p>The Downtown FEIR concludes that the cumulative development of the downtown would not impact the existing downtown storm drain system. Since implementation of the Project would not result in a significant increase of impervious surfaces, the amount of runoff volume entering the storm drain system would not create demand for new storm water facilities. Direct and cumulative impacts associated with this issue are considered not significant. Direct</p>					X	X

	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
and cumulative impacts associated with this issue are considered not significant.						
<p>(g) <i>Substantial adverse physical impacts associated with the provision of new wastewater transmission or treatment facilities?</i></p> <p>The Downtown FEIR concludes that new wastewater treatment facilities would not be required to address the cumulative development of the Downtown. In addition, sewer improvements that may be needed to serve the Project are categorically exempt from environmental review under CEQA as stated in the Downtown FEIR. Therefore, impacts associated with this issue would not be significant.</p>					X	X
<p>(h) <i>Substantial adverse physical impacts associated with the provision of new landfill facilities?</i></p> <p>The Downtown FEIR concludes that cumulative development within the Downtown would increase the amount of solid waste to the Miramar Landfill and contribute to the eventual need for an alternative landfill. Although the proposed Project would generate a higher level of solid waste than the existing use of the site, implementation of a mandatory Waste Management Plan and compliance with the applicable provisions of the San Diego Municipal Code would ensure that both short-term and long-term project-level impacts are not significant. However, the Project would contribute, in combination with other development activities in Downtown, to the cumulative increase in the generation of solid waste sent to Miramar Landfill and the eventual need for a new landfill as identified in the Downtown FEIR. The location and size of a new landfill is unknown at this time. Pursuant to Section 15145 of CEQA, analysis from the physical changes that may occur from future</p>					X	X

	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
construction of landfills would be speculative and no further analysis of their impacts is required. However, construction or expansion of a landfill would be subject to CEQA. Environmental documentation prepared pursuant to CEQA would identify potentially significant impacts of the proposed Project and appropriate mitigation measures. Therefore, cumulative impacts of the proposed Project are also considered not significant.						
15. PARKS AND RECREATIONAL FACILITIES:						
<p>(a) <i>Substantial increase in the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?</i></p> <p>The Downtown FEIR discusses impacts to parks and other recreational facilities and the maintenance thereof and concludes that build out of Downtown would not result in significant impacts associated with this issue. Since the land use designation of the proposed development does not differ from the land use designation assumed in the Downtown FEIR analysis, the Project would not generate a level of demand for parks and recreational facilities beyond the level assumed by the Downtown FEIR. Therefore, substantial deterioration of existing neighborhood or regional parks would not occur or be substantially accelerated as a result of the Project. No significant impacts with this issue would occur.</p>					X	X
16. TRANSPORTATION/TRAFFIC:						
<p>(a) <i>Cause the LOS on a roadway segment or intersection to drop below LOS E?</i></p> <p>Based on Centre City Cumulative Traffic Generation</p>		X			X	

	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
<p>Rates for residential projects contained in the May 2003 SDMC Trip Generation Manual, the worst-case scenario for automobile trips by the Project is 211 Average Daily Trips (ADT) based on a trip generation rate of four ADT per unit and 18 ADT per 1,000 square feet of commercial/retail space. Since this does not exceed the 2,400 ADT threshold for significance the Project's impacts on roadway segments and intersections would not be significant.</p> <p>Traffic generated by the Project in combination with traffic generated by other downtown development would contribute to the significant cumulative impacts projected in the DCP FEIR to occur on a number of downtown roadway segments and intersections, and street within neighborhoods surrounding the DCP area at buildout of the downtown. However, the Project's direct impacts on downtown roadway segments or intersections would not be significant.</p> <p>The DCP FEIR includes mitigation measures to address impacts associated with buildout of the DCP, but the DCP FEIR acknowledges that the identified measures may or may not be able to fully mitigate these cumulative impacts due to constraints imposed by bicycle and pedestrian activities and the land uses adjacent to affected roadways. Pursuant to Downtown FEIR Mitigation Measure TRF-A.1.1-2, the applicant will also be required to pay development impact fees to fund a fair share fee towards transportation improvements for the DCP Area. As required by Downtown FEIR Mitigation Measure TRF-A.1.1-3, the City adopted the Downtown Community Public Facilities Financing Plan 2015 that established a transportation fee. The transportation fee is intended to fund street, transit, bicycle, pedestrian improvements, promenades, and below grade parking structures, as</p>						

	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
further set forth in the Downtown Community PFFP.						
<p><i>(b) Cause the LOS on a freeway segment to drop below LOS E or cause a ramp delay in excess of 15 minutes?</i></p> <p>The Downtown FEIR concludes that development within Downtown will result in significant cumulative impacts to freeway segments and ramps serving the Downtown area. Since the land use designation of the Project is consistent with the land use designation assumed in the Downtown FEIR analysis, the Project would contribute on a cumulative-level to the substandard LOS F identified in the Downtown FEIR on all freeway segments in the Downtown area and several ramps serving Downtown. Downtown FEIR Mitigation Measure TRF-A.2.1-1 would reduce these impacts to the extent feasible, but not to below the level of significance. This mitigation measure is not the responsibility of the Project, and therefore is not included in Attachment A. The Downtown FEIR concludes that the uncertainty associated with implementing freeway improvements and limitations in increasing ramp capacity limits the feasibility of fully mitigating impacts to these facilities. Thus, the Project's cumulative-level impacts to freeways would remain significant and unavoidable, consistent with the analysis of the Downtown FEIR. The Project would not have a direct impact on freeway segments and ramps.</p>		X			X	
<p><i>(c) Substantially discourage the use of alternative modes of transportation or cause transit service capacity to be exceeded?</i></p> <p>The proposed Project in and of itself does not include any features that would discourage the use of alternative modes of transportation. The Project's proximity to several other community serving uses, including nearby</p>					X	X

	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
shopping and recreational activities also encourage walking. Additionally, visitors of the proposed Project would be encouraged to use alternative transportation means as there are several bus lines and the MTS facility/trolley station within a five-minute walk. Therefore, the Project will cause no significant impacts related to alternative modes of transportation or cause transit service capacity to be exceeded.						
17. MANDATORY FINDINGS OF SIGNIFICANCE:						
<p>(a) <i>Does the Project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?</i></p> <p>As indicated in the Downtown FEIR, due to the highly urbanized nature of the Downtown area, no sensitive plant or animal species, habitats, or wildlife migration corridors are located in the Downtown area. Additionally, the Project does not have the potential to eliminate important examples of major periods of California history or pre-history at the Project level. No other aspects of the Project would substantially degrade the environment. Cumulative impacts are described in Section 17.b below.</p>					X	X
<p>(b) <i>Does the Project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a Project are considerable when viewed in connection with the effects of past Projects, the effects of other current Projects, and the effects of</i></p>		X				

	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
<p><i>probable future Projects)?</i></p> <p>As acknowledged in the Downtown FEIR, the buildout of Downtown would result in cumulative impacts associated with: air quality, historical resources, paleontological resources, physical changes associated with transient activities, noise, parking, traffic, and water quality. This Project would contribute to those impacts. Implementation of the mitigation measures identified in the Downtown FEIR would reduce some significant impacts; however, the impacts would remain significant and immitigable as identified in the Downtown FEIR and the Statement of Overriding Considerations adopted by the City. This Project's contribution would not be greater than anticipated by the Downtown FEIR and therefore no further analysis is required.</p>						
<p>(c) <i>Does the Project have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly?</i></p> <p>As acknowledged in the FEIR, the build-out of Downtown would result in cumulative impacts associated with: air quality, historical resources, paleontological resources, physical changes associated with transient activities, noise, traffic, and water quality. This Project would contribute to those impacts. However, the impacts associated with this Project would be no greater than those assumed in the Downtown FEIR and therefore no further environmental review is required under CEQA.</p>	X	X				

Downtown FEIR/SEIR Mitigation Monitoring and Reporting Program				
Significant Impact(s)	Mitigation Measure(s)	Implementation		
		Time Frame	Responsibility	Verification Responsibility
AIR QUALITY (AQ)				
Impact AQ-B.1	Dust and construction equipment engine emissions generated during grading and demolition would impact local and regional air quality. (Direct and Cumulative)			
	<p>Mitigation Measure AQ-B.1-1: Prior to approval of a Grading or Demolition Permit, the City shall confirm that the following conditions have been applied, as appropriate:</p> <ol style="list-style-type: none">Exposed soil areas shall be watered twice per day. On windy days or when fugitive dust can be observed leaving the development site, additional applications of water shall be applied as necessary to prevent visible dust plumes from leaving the development site. When wind velocities are forecast to exceed 25 mph, all ground disturbing activities shall be halted until winds that are forecast to abate below this threshold.Dust suppression techniques shall be implemented including, but not limited to, the following:<ol style="list-style-type: none">Portions of the construction site to remain inactive longer than a period of three months shall be seeded and watered until grass cover is grown or otherwise stabilized in a manner acceptable to Civic San Diego.On-site access points shall be paved as soon as feasible or watered periodically or otherwise stabilized.Material transported off-site shall be either sufficiently watered or securely covered to prevent excessive amounts of dust.The area disturbed by clearing, grading, earthmoving, or excavation operations shall be minimized at all times.Vehicles on the construction site shall travel at speeds less than 15 mph.Material stockpiles subject to wind erosion during construction activities, which will not be utilized within three days, shall be covered with plastic, an alternative cover deemed equivalent to plastic, or sprayed with a nontoxic chemical stabilizer.Where vehicles leave the construction site and enter adjacent public streets, the streets shall be swept daily or washed down at the end of the work day to remove soil tracked onto the paved surface. Any visible track-out extending for more than fifty (50) feet from the access point shall be swept or washed within thirty (30) minutes of deposition.	Prior to Demolition or Grading Permit (Design)	Developer	City

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Significant Impact(s)	Mitigation Measure(s)	Implementation		
		Time Frame	Responsibility	Verification Responsibility
	<p>6. All diesel-powered vehicles and equipment shall be properly operated and maintained.</p> <p>7. All diesel-powered vehicles and gasoline-powered equipment shall be turned off when not in use for more than five minutes, as required by state law.</p> <p>8. The construction contractor shall utilize electric or natural gas-powered equipment in lieu of gasoline or diesel-powered engines, where feasible.</p> <p>9. As much as possible, the construction contractor shall time the construction activities so as not to interfere with peak hour traffic. In order to minimize obstruction of through traffic lanes adjacent to the site, a flag-person shall be retained to maintain safety adjacent to existing roadways, if necessary.</p> <p>10. The construction contractor shall support and encourage ridesharing and transit incentives for the construction crew.</p> <p>11. Low VOC coatings shall be used as required by SDAPCD Rule 67. Spray equipment with high transfer efficiency, such as the high volume-low pressure spray method, or manual coatings application such as paint brush hand roller, trowel, spatula, dauber, rag, or sponge, shall be used to reduce VOC emissions, where feasible.</p> <p>12. If construction equipment powered by alternative fuel sources (liquefied natural gas/compressed natural gas) is available at comparable cost, the developer shall specify that such equipment be used during all construction activities on the development site.</p> <p>13. The developer shall require the use of particulate filters on diesel construction equipment if use of such filters is demonstrated to be cost-competitive for use on this development.</p> <p>14. During demolition activities, safety measures as required by City/County/State for removal of toxic or hazardous materials shall be utilized.</p> <p>15. Rubble piles shall be maintained in a damp state to minimize dust generation.</p> <p>16. During finish work, low-VOC paints and efficient transfer systems shall be utilized, to the extent possible.</p> <p>17. If alternative-fueled and/or particulate filter-equipped construction equipment is not feasible, construction equipment shall use the newest, least-polluting equipment, whenever possible. During finish work, low-VOC paints and efficient transfer systems shall be utilized, to the extent possible.</p>			

Downtown FEIR/SEIR Mitigation Monitoring and Reporting Program				
Significant Impact(s)	Mitigation Measure(s)	Implementation		
		Time Frame	Responsibility	Verification Responsibility
HISTORICAL RESOURCES (HIST)				
Impact HIST-A.1	Future development in Downtown could impact significant architectural structures. (Direct and Cumulative)			
	<p>Mitigation Measure HIST-A.1-1: For construction or development permits that may impact potentially historical resources which are 45 years of age or older and which have not been evaluated for local, state and federal historic significance, a site specific survey shall be required in accordance with the Historical Resources Regulations in the LDC. Based on the survey and the best information available, City Staff to the Historical Resources Board (HRB) shall determine whether historical resources exist, whether potential historical resource(s) is/are eligible for designation as designated historical resource(s) by the HRB, and the precise location of the resource(s). The identified historical resource(s) may be nominated for HRB designation as a result of the survey pursuant to Chapter 12, Article 3, Division 2, Designation of Historical Resource procedures, of the LDC.</p> <p>All applications for construction and development permits where historical resources are present on the site shall be evaluated by City Staff to the HRB pursuant to Chapter 14, Article 3, Division 2, Historical Resources Regulations of the LDC.</p> <p>1. National Register-Listed/Eligible, California Register-Listed/Eligible Resources: Resources listed in or formally determined eligible for the National Register or California Register and resources identified as contributing within a National or California Register District, shall be retained onsite and any improvements, renovation, rehabilitation and/or adaptive reuse of the property shall ensure its preservation and be consistent with the Secretary of the Interior’s Standards for the Treatment of Historic Properties (1995) and the associated Guidelines.</p> <p>2. San Diego Register-Listed Resources: Resources listed in the San Diego Register of Historical Resources, or determined to be a contributor to a San Diego Register District, shall, whenever possible, be retained on-site. Partial retention, relocation, or demolition of a resource shall only be permitted according to Chapter 14, Article 3, Division 2, Historical Resources Regulations of the LDC.</p>	Prior to Development Permit (Design) Prior to Demolition, Grading, and/or Building Permit (Design) Prior to Certificate of Occupancy (Implementation)	Developer	Civic San Diego /City

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Significant Impact(s)	Mitigation Measure(s)	Implementation		
		Time Frame	Responsibility	Verification Responsibility
	<p>Mitigation Measure HIST-A.1-2: If the potential exists for direct and/or indirect impacts to retained or relocated designated and/or potential historical resources (“historical resources”), the following measures shall be implemented in coordination with a Development Services Department designee and/or City Staff to the HRB (“City Staff”) in accordance with Chapter 14, Article 3, Division 2, Historical Resources Regulations of the LDC.</p> <p>I. Prior to Permit Issuance</p> <p>A. Construction Plan Check</p> <ol style="list-style-type: none"> 1. Prior to Notice to Proceed (NTP) for any construction permits, including but not limited to, the first Grading Permit Building Permits, but prior to the first Preconstruction (Precon) Meeting, whichever is applicable, City Staff shall verify that the requirements for historical monitoring during demolition and/or stabilization have been noted on the appropriate construction documents. <ol style="list-style-type: none"> (a) Stabilization work cannot begin until a Precon Meeting has been held at least one week prior to issuance of appropriate permits. (b) Physical description, including the year and type of historical resource, and extent of stabilization shall be noted on the plans. <p>B. Submittal of Treatment Plan for Retained Historical Resources</p> <ol style="list-style-type: none"> 1. Prior to NTP for any construction permits, including but not limited to, the first Grading Permit and Building Permits, but prior to the first Precon Meeting, whichever is applicable, the Applicant shall submit a Treatment Plan to City Staff for review and approval in accordance with the Secretary of the Interior’s Standards for the Treatment of Historic Properties (1995) and the associated Guidelines. The Treatment Plan shall include measures for protecting any historical resources, as defined in the LDC, during construction related activities (e.g., removal of non-historic features, demolition of adjacent structures, subsurface structural support, etc.). The Treatment Plan shall be shown as notes on all construction documents (i.e., Grading and/or Building Plans). <p>C. Letters of Qualification have been submitted to City Staff</p> <ol style="list-style-type: none"> 1. The applicant shall submit a letter of verification to City Staff identifying the 			

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Significant Impact(s)	Mitigation Measure(s)	Implementation		
		Time Frame	Responsibility	Verification Responsibility
	<p>Principal Investigator (PI) for the project and the names of all persons involved in this MMRP (i.e., Architectural Historian, Historic Architect and/or Historian), as defined in the City of San Diego HRG.</p> <p>2. City Staff will provide a letter to the applicant confirming that the qualifications of the PI and all persons involved in the historical monitoring of the project meet the qualification standards established by the HRG.</p> <p>3. Prior to the start of work, the applicant must obtain approval from City Staff for any personnel changes associated with the monitoring program.</p> <p>II. Prior to Start of Construction</p> <p>A. Documentation Program (DP)</p> <p>1. Prior to the first Precon Meeting and/or issuance of any construction permit, the DP shall be submitted to City Staff for review and approval and shall include the following:</p> <p>(a) Photo Documentation</p> <p>(1) Documentation shall include professional quality photo documentation of the historical resource(s) prior to any construction that may cause direct and/or indirect impacts to the resource(s) with 35mm black and white photographs, 4x6 standard format, taken of all four elevations and close-ups of select architectural elements, such as, but not limited to, roof/wall junctions, window treatments, and decorative hardware. Photographs shall be of archival quality and easily reproducible.</p> <p>(2) Xerox copies or CD of the photographs shall be submitted for archival storage with the City of San Diego HRB and the Civic San Diego Project file. One set of original photographs and negatives shall be submitted for archival storage with the California Room of the City of San Diego Public Library, the San Diego Historical Society and/or other relative historical society or group(s).</p> <p>(b) Required drawings</p> <p>(1) Measured drawings of the building's exterior elevations depicting existing conditions or other relevant features shall be produced from</p>			

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		Time Frame	Responsibility	Verification Responsibility
	<p>recorded, accurate measurements. If portions of the building are not accessible for measurement, or cannot be reproduced from historic sources, they should not be drawn, but clearly labeled as not accessible. Drawings produced in ink on translucent material or archivally stable material (blue-line drawings) are acceptable). Standard drawing sizes are 19 by 24 inches or 24 by 36 inches, standard scale is 1/4 inch = 1 foot.</p> <p>(2) One set of measured drawings shall be submitted for archival storage with the City of San Diego HRB, the Civic San Diego Project file, the South Coastal Information Center, the California Room of the City of San Diego Public Library, the San Diego Historical Society and/or other historical society or group(s).</p> <p>2. Prior to the first Precon Meeting, City Staff shall verify that the DP has been approved.</p> <p>B. PI Shall Attend Precon Meetings</p> <p>1. Prior to beginning any work that may impact any historical resource(s) which is/are subject to this MMRP, the Applicant shall arrange a Precon Meeting that shall include the PI, Construction Manager (CM) and/or Grading Contractor, Resident Engineer (RE), Historical Monitor(s), Building Inspector (BI), if appropriate, and City Staff. The qualified Historian and/or Architectural Historian shall attend any grading/excavation related Precon Meetings to make comments and/or suggestions concerning the Historical Monitoring program with the Construction Manager and/or Grading Contractor.</p> <p>(a) If the PI is unable to attend the Precon Meeting, the Applicant shall schedule a focused Precon Meeting with City Staff, the PI, RE, CM or BI, if appropriate, prior to the start of any work that requires monitoring.</p> <p>2. Historical Monitoring Plan</p> <p>(a) Prior to the start of any work that is subject to an Historical Monitoring Plan, the PI shall submit an Historical Monitoring Plan which describes how the monitoring would be accomplished for approval by City Staff. The Historical Monitoring Plan shall include an Historical Monitoring Exhibit (HME) based on the appropriate construction documents (reduced to 11x17 inches) to City Staff</p>			

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		Time Frame	Responsibility	Verification Responsibility
	<p>identifying the areas to be monitored including the delineation of grading/excavation limits.</p> <p>(b) Prior to the start of any work, the PI shall also submit a construction schedule to City Staff through the RE indicating when and where monitoring will occur.</p> <p>(c) The PI may submit a detailed letter to City Staff prior to the start of work or during construction requesting a modification to the monitoring program. This request shall be based on relevant information such as review of final construction documents which indicate site conditions such as underpinning, shoring and/or extensive excavation which could result in impacts to, and/or reduce impacts to the on-site or adjacent historical resource.</p> <p>C. Implementation of Approved Treatment Plan for Historical Resources</p> <ol style="list-style-type: none"> 1. Implementation of the approved Treatment Plan for the protection of historical resources within the project site may not begin prior to the completion of the Documentation Program as defined above. 2. The qualified Historical Monitor(s) shall attend weekly jobsite meetings and be on-site daily during the stabilization phase for any retained or adjacent historical resource to photo document the Treatment Plan process. 3. The qualified Historical Monitor(s) shall document activity via the Consultant Site Visit Record (CSV). The CSV's shall be faxed by the CM to the RE the first day and last day (Notification of Monitoring Completion) of the Treatment Plan process and in the case of ANY unanticipated incidents. The RE shall forward copies to City Staff. 4. Prior to the start of any construction related activities, the applicant shall provide verification to City Staff that all historical resources on-site have been adequately stabilized in accordance with the approved Treatment Plan. This may include a site visit with City Staff, the CM, RE or BI, but may also be accomplished through submittal of the draft Treatment Plan photo documentation report. 5. City Staff will provide written verification to the RE or BI after the site visit or upon approval of draft Treatment Plan report indicating that construction related activities can proceed. 			

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Significant Impact(s)	Mitigation Measure(s)	Implementation		
		Time Frame	Responsibility	Verification Responsibility
	<p>III. During Construction</p> <p>A. Qualified Historical Monitor(s) Shall be Present During Grading/Excavation/Trenching</p> <ol style="list-style-type: none"> 1. The Qualified Historical Monitor(s) shall be present full-time during grading/excavation/trenching activities which could result in impacts to historical resources as identified on the HME. The Construction Manager is responsible for notifying the RE, PI, and City Staff of changes to any construction activities. 2. The Qualified Historical Monitor(s) shall document field activity via the CSV. The CSV's shall be faxed by the CM to the RE the first day of monitoring, the last day of monitoring, monthly (Notification of Monitoring Completion), and in the case of ANY incidents involving the historical resource. The RE shall forward copies to City Staff. 3. The PI may submit a detailed letter to City Staff during construction requesting a modification to the monitoring program when a field condition arises which could effect the historical resource being retained on-site or adjacent to the construction site. <p>B. Notification Process</p> <ol style="list-style-type: none"> 1. In the event of damage to a historical resource retained on-site or adjacent to the project site, the Qualified Historical Monitor(s) shall direct the contractor to temporarily divert construction activities in the area of historical resource and immediately notify the RE or BI, as appropriate, and the PI (unless Monitor is the PI). 2. The PI shall immediately notify City Staff by phone of the incident, and shall also submit written documentation to City Staff within 24 hours by fax or email with photos of the resource in context, if possible. <p>C. Determination/Evaluation of Impacts to a Historical Resource</p> <ol style="list-style-type: none"> 1. The PI shall evaluate the incident relative to the historical resource. <ol style="list-style-type: none"> (a) The PI shall immediately notify City Staff by phone to discuss the incident and shall also submit a letter to City Staff indicating whether additional 			

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		Time Frame	Responsibility	Verification Responsibility
	<p>mitigation is required.</p> <p>(b) If impacts to the historical resource are significant, the PI shall submit a proposal for City Staff review and written approval in accordance with Chapter 14, Article 3, Division 2, Historical Resources Regulations of the LDC and the Secretary of the Interior's Standards for the Treatment of Historic Properties (1995) and the associated Guidelines. Direct and/or indirect impacts to historical resources from construction activities must be mitigated before work will be allowed to resume.</p> <p>(c) If impacts to the historical resource are not considered significant, the PI shall submit a letter to City Staff indicating that the incident will be documented in the Final Monitoring Report. The letter shall also indicate that that no further work is required.</p> <p>IV. Night Work</p> <p>A. If night and/or weekend work is included in the contract</p> <ol style="list-style-type: none"> When night and/or weekend work is included in the contract package, the extent and timing shall be presented and discussed at the Precon Meeting. The following procedures shall be followed. <ol style="list-style-type: none"> No Impacts/Incidents <p>In the event that no historical resources were impacted during night and/or weekend work, the PI shall record the information on the CSVr and submit to City Staff via fax by 8 a.m. of the next business day.</p> Potentially Significant Impacts <p>If the PI determines that a potentially significant impact has occurred to a historical resource, the procedures detailed under Section III - During Construction shall be followed.</p> The PI shall immediately contact City Staff, or by 8 a.m. of the next business day to report and discuss the findings as indicated in Section III-B, unless other specific arrangements have been made. 			

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		Time Frame	Responsibility	Verification Responsibility
	<p>B. If night and/or weekend work becomes necessary during the course of construction:</p> <ol style="list-style-type: none"> 1. The Construction Manager shall notify the RE, or BI, as appropriate, a minimum of 24 hours before the work is to begin. 2. The RE, or BI, as appropriate, shall notify City Staff immediately. <p>C. All other procedures described above shall apply, as appropriate.</p> <p>V. Post Construction</p> <p>A. Submittal of Draft Monitoring Report</p> <ol style="list-style-type: none"> 1. The PI shall submit two copies of the Draft Monitoring Report (even if negative), prepared in accordance with the Historical Resources Guidelines (HRG) and Appendices which describes the results, analysis, and conclusions of all phases of the Historical Monitoring Plan (with appropriate graphics) to City Staff for review and approval within 90 days following the completion of monitoring. <ol style="list-style-type: none"> (a) The preconstruction Treatment Plan and Documentation Plan (photos and measured drawings) and Historical Commemorative Program, if applicable, shall be included and/or incorporated into the Draft Monitoring Report. (b) The PI shall be responsible for updating (on the appropriate State of California Department of Park and Recreation forms-DPR 523 A/B) any existing site forms to document the partial and/or complete demolition of the resource. Updated forms shall be submitted to the South Coastal Information Center with the Final Monitoring Report. 2. City Staff shall return the Draft Monitoring Report to the PI for revision or, for preparation of the Final Report. 3. The PI shall submit revised Draft Monitoring Report to City Staff for approval. 4. City Staff shall provide written verification to the PI of the approved report. 5. City Staff shall notify the RE or BI, as appropriate, of receipt of all Draft Monitoring Report submittals and approvals. <p>B. Final Monitoring Report(s)</p>			

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Significant Impact(s)	Mitigation Measure(s)	Implementation		
		Time Frame	Responsibility	Verification Responsibility
	<ol style="list-style-type: none"> 1. The PI shall submit one copy of the approved Final Monitoring Report to the RE or BI as appropriate, and one copy to City Staff (even if negative), within 90 days after notification from City Staff that the draft report has been approved. 2. The RE shall, in no case, issue the Notice of Completion until receiving a copy of the approved Final Monitoring Report from City Staff. 			
Impact HIST-B.1	Development in Downtown could impact significant buried archaeological resources. (Direct and Cumulative)			
	<p>Mitigation Measure HIST-B.1-1: If the potential exists for direct and/or indirect impacts to significant buried archaeological resources, the following measures shall be implemented in coordination with a Development Services Department designee and/or City Staff to the HRB ("City Staff") in accordance with Chapter 14, Article 3, Division 2, Historical Resources Regulations of the LDC. Prior to issuance of any permit that could directly affect an archaeological resource, City Staff shall assure that all elements of the MMRP are performed in accordance with all applicable City regulations and guidelines by an Archaeologist meeting the qualifications specified in Appendix B of the San Diego LDC, Historical Resources Guidelines. City Staff shall also require that the following steps be taken to determine: (1) the presence of archaeological resources and (2) the appropriate mitigation for any significant resources which may be impacted by a development activity. Sites may include residential and commercial properties, privies, trash pits, building foundations, and industrial features representing the contributions of people from diverse socio-economic and ethnic backgrounds. Sites may also include resources associated with pre-historic Native American activities. Archeological resources which also meet the definition of historical resources or unique archaeological resources under CEQA or the SDMC shall be treated in accordance with the following evaluation procedures and applicable mitigation program:</p> <p>Step 1–Initial Evaluation</p> <p>An initial evaluation for the potential of significant subsurface archaeological resources shall be prepared to the satisfaction of City Staff as part of an Environmental Secondary Study for any activity which involves excavation or building demolition. The initial evaluation shall be guided by an appropriate level research design in accordance with the City's LDC, Historical Resources Guidelines. The person completing the initial review shall meet the qualification requirements as set forth in the Historical Resources Guidelines and shall be approved by City</p>	<p>Prior to Demolition or Grading Permit (Design)</p> <p>Prior to Certificate of Occupancy (Implementation)</p>	Developer	City Staff

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		Time Frame	Responsibility	Verification Responsibility
	<p>Staff. The initial evaluation shall consist, at a minimum, of a review of the following historical sources: The 1876 Bird's Eye View of San Diego, all Sanborn Fire Insurance Company maps, appropriate City directories and maps that identify historical properties or archaeological sites, and a records search at the South Coastal Information Center for archaeological resources located within the property boundaries. Historical and existing land uses shall also be reviewed to assess the potential presence of significant prehistoric and historic archaeological resources. The person completing the initial review shall also consult with and consider input from local individuals and groups with expertise in the historical resources of the San Diego area. These experts may include the University of California, San Diego State University, San Diego Museum of Man, Save Our Heritage Organization, local historical and archaeological groups, the Native American Heritage Commission (NAHC), designated community planning groups, and other individuals or groups that may have specific knowledge of the area. Consultation with these or other individuals and groups shall occur as early as possible in the evaluation process.</p> <p>When the initial evaluation indicates that important archaeological sites may be present on a project site but their presence cannot be confirmed prior to construction or demolition due to obstructions or spatially limited testing and data recovery, the applicant shall prepare and implement an archaeological monitoring program as a condition of development approval to the satisfaction of City Staff. If the NAHC Sacred Lands File search is positive for Native American resources within the project site, then additional evaluation must include participation of a local Native American consultant in accordance with CEQA Sections 15064.5(d), 15126.4(b)(3) and Public Resources Code Section 21083.2.</p> <p>No further action is required if the initial evaluation demonstrates there is no potential for subsurface resources. The results of this research shall be summarized in the Secondary Study.</p> <p>Step 2–Testing</p> <p>A testing program is required if the initial evaluation demonstrates that there is a potential for subsurface resources. The testing program shall be conducted during the hazardous materials remediation or following the removal of any structure or surface covering which may be underlain by potential resources. The removal of these structures shall be conducted in a manner which minimizes disturbance of underlying soil. This shall entail a separate phase of investigations from any mitigation monitoring during construction.</p> <p>The testing program shall be performed by a qualified Historical Archaeologist meeting the qualifications specified in Appendix B of the San Diego LDC, HRG. The Historical</p>			

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	<p>Archaeologist must be approved by City Staff prior to commencement. Before commencing the testing, a treatment plan shall be submitted for City Staff approval that reviews the initial evaluation results and includes a research design. The research design shall be prepared in accordance with the City's HRG and include a discussion of field methods, research questions against which discoveries shall be evaluated for significance, collection strategy, laboratory and analytical approaches, and curation arrangements. All tasks shall be in conformity with best practices in the field of historic urban archaeology.</p> <p>A recommended approach for historic urban sites is at a minimum fills and debris along interior lot lines or other areas indicated on Sanborn maps.</p> <p>Security measures such as a locked fence or surveillance shall be taken to prevent looting or vandalism of archaeological resources as soon as demolition is complete or paved surfaces are removed. These measures shall be maintained during archaeological field investigations. It is recommended that exposed features be covered with steel plates or fill dirt when not being investigated.</p> <p>The results of the testing phase shall be submitted in writing to City Staff and shall include the research design, testing results, significance evaluation, and recommendations for further treatment. Final determination of significance shall be made in consultation with City Staff , and with the Native American community, if the finds are prehistoric. If no significant resources are found and site conditions are such that there is no potential for further discoveries, then no further action is required. If no significant resources are found but results of the initial evaluation and testing phase indicates there is still a potential for resources to be present in portions of the property that could not be tested, then mitigation monitoring is required and shall be conducted in accordance with the provisions set forth in Step 4 - Monitoring. If significant resources are discovered during the testing program, then data recovery in accordance with Step 3 shall be undertaken prior to construction. If the existence or probable likelihood of Native American human remains or associated grave goods area discovered through the testing program, the Qualified Archaeologist shall stop work in the area, notify the City Building Inspector, City staff, and immediately implement the procedures set forth in CEQA Guidelines Section 15064.5 and the California PRC Section 5097.98 for discovery of human remains. This procedure is further detailed in the Mitigation, Monitoring and Reporting Program (Step 4). City Staff must concur with evaluation results before the next steps can proceed.</p> <p>Step 3–Data Recovery</p>			

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Significant Impact(s)	Mitigation Measure(s)	Implementation		
		Time Frame	Responsibility	Verification Responsibility
	<p>For any site determined to be significant, a Research Design and Data Recovery Program shall be prepared in accordance with the City's Historical Resources Guidelines, approved by City Staff, and carried out to mitigate impacts before any activity is conducted which could potentially disturb significant resources. The archaeologist shall notify City Staff of the date upon which data recovery will commence ten (10) working days in advance.</p> <p>All cultural materials collected shall be cleaned, catalogued and permanently curated with an appropriate institution. Native American burial resources shall be treated in the manner agreed to by the Native American representative or be reinterred on the site in an area not subject to further disturbance in accordance with CEQA section 15164.5 and the Public Resources Code section 5097.98. All artifacts shall be analyzed to identify function and chronology as they relate to the history of the area. Faunal material shall be identified as to species and specialty studies shall be completed, as appropriate. All newly discovered archaeological sites shall be recorded with the South Coastal Information Center at San Diego State University. Any human bones and associated grave goods of Native American origin encountered during Step 2-Testing, shall, upon consultation, be turned over to the appropriate Native American representative(s) for treatment in accordance with state regulations as further outlined under Step 4-Monitoring (Section IV. Discovery of Human Remains).</p> <p>A draft Data Recovery Report shall be submitted to City Staff within twelve months of the commencement of the data recovery. Data Recovery Reports shall describe the research design or questions, historic context of the finds, field results, analysis of artifacts, and conclusions. Appropriate figures, maps and tables shall accompany the text. The report shall also include a catalogue of all finds and a description of curation arrangements at an approved facility, and a general statement indicating the disposition of any human remains encountered during the data recovery effort (please note that the location of reinternment and/or repatriation is confidential and not subject to public disclosure in accordance with state law). Finalization of draft reports shall be subject to City Staff review.</p> <p>Step 4 – Monitoring</p> <p>If no significant resources are encountered, but results of the initial evaluation and testing phase indicates there is still a potential for resources to be present in portions of the property that could not be tested, then mitigation monitoring is required and shall be conducted in accordance with the following provisions and components:</p> <p>I. Prior to Permit Issuance</p>			

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		Time Frame	Responsibility	Verification Responsibility
	<p>A. Construction Plan Check</p> <ol style="list-style-type: none"> 1. Prior to NTP for any construction permits, including but not limited to, the first Grading Permit, Demolition Permits and Building Permits, but prior to the first Precon Meeting, whichever is applicable, City Staff shall verify that the requirements for Archaeological Monitoring and Native American monitoring, where the project may impact Native American resources, have been noted on the appropriate construction documents. <p>B. Letters of Qualification have been submitted to City Staff</p> <ol style="list-style-type: none"> 1. The applicant shall submit a letter of verification to City Staff identifying the PI for the project and the names of all persons involved in the archaeological monitoring program, as defined in the City of San Diego HRG. If applicable, individuals involved in the archaeological monitoring program must have completed the 40-hour Hazardous Waste Operations and Emergency Response training with certification documentation. 2. City Staff will provide a letter to the applicant confirming that the qualifications of the PI and all persons involved in the archaeological monitoring of the project meet the qualifications established in the HRG. 3. Prior to the start of work, the applicant must obtain written approval from City Staff for any personnel changes associated with the monitoring program. <p>II. Prior to Start of Construction</p> <p>A. Verification of Records Search</p> <ol style="list-style-type: none"> 1. The PI shall provide verification to City Staff that a site-specific records search (1/4 mile radius) has been completed. Verification includes, but is not limited to a copy of a confirmation letter from South Coastal Information Center, or, if the search was in-house, a letter of verification from the PI stating that the search was completed. 2. The letter shall introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities. 3. The PI may submit a detailed letter to City Staff requesting a reduction to the 1/4 mile radius. 			

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	<p>B. PI Shall Attend Precon Meetings</p> <ol style="list-style-type: none"> 1. Prior to beginning any work that requires monitoring, the Applicant shall arrange a Precon Meeting that shall include the PI, Native American consultant/monitor (where Native American resources may be impacted), CM and/or Grading Contractor, RE, the Native American representative(s) (where Native American resources may be impacted), BI, if appropriate, and City Staff. The qualified Archaeologist and the Native American consultant/monitor shall attend any grading/excavation related Precon Meetings to make comments and/or suggestions concerning the Archaeological Monitoring program with the Construction Manager and/or Grading Contractor. (a) If the PI is unable to attend the Precon Meeting, the Applicant shall schedule a focused Precon Meeting with City Staff, the PI, RE, CM or BI, if appropriate, prior to the start of any work that requires monitoring. 2. Archaeological Monitoring Plan (AMP) <ol style="list-style-type: none"> (a) Prior to the start of any work that requires monitoring, the PI shall submit an Archaeological Monitoring Plan (with verification that the AMP has been reviewed and approved by the Native American consultant/monitor when Native American resources may be impacted) which describes how the monitoring would be accomplished for approval by City Staff and the Native American monitor. The AMP shall include an Archaeological Monitoring Exhibit (AME) based on the appropriate construction documents (reduced to 11 by 17 inches) to City Staff identifying the areas to be monitored including the delineation of grading/excavation limits. (b) The AME shall be based on the results of a site-specific records search as well as information regarding existing known soil conditions (native or formation). (c) Prior to the start of any work, the PI shall also submit a construction schedule to City Staff through the RE indicating when and where monitoring will occur. (d) The PI may submit a detailed letter to City Staff prior to the start of work or during construction requesting a modification to the monitoring program. This request shall be based on relevant information such as review of final construction documents which indicate site conditions such as depth of excavation and/or site graded to bedrock, etc., which may reduce or increase 			

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Significant Impact(s)	Mitigation Measure(s)	Implementation		
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	<p>the potential for resources to be present.</p> <p>III. During Construction</p> <p>A. Monitor(s) Shall be Present During Grading/Excavation/Trenching</p> <ol style="list-style-type: none"> 1. The Archaeological monitor shall be present full-time during all soil disturbing and grading/excavation /trenching activities which could result in impacts to archaeological resources as identified on the AME. The Construction Manager is responsible for notifying the RE, PI, and City Staff of changes to any construction activities. 2. The Native American consultant/monitor shall determine the extent of their presence during soil disturbing and grading/excavation/trenching activities based on the AME, and provide that information to the PI and City Staff. If prehistoric resources are encountered during the Native American consultant/monitor's absence, work shall stop and the Discovery Notification Processes detailed in Sections III.B-C, and IVA-D shall commence. 3. The archeological and Native American consultant/monitor shall document field activity via the CSV. The CSV's shall be faxed by the CM to the RE the first day of monitoring, the last day of monitoring, monthly (Notification of Monitoring Completion), and in the case of ANY discoveries. The RE shall forward copies to City Staff. 4. The PI may submit a detailed letter to City Staff during construction requesting a modification to the monitoring program when a field condition such as modern disturbance post-dating the previous grading/trenching activities, presence of fossil formations, or when native soils are encountered that may reduce or increase the potential for resources to be present. <p>B. Discovery Notification Process</p> <ol style="list-style-type: none"> 1. In the event of a discovery, the Archaeological Monitor shall direct the contractor to temporarily divert all soil disturbing activities, including but not limited to, digging, trenching, excavating, or grading activities in the area of discovery and in the area reasonably suspected to overlay adjacent resources and immediately notify the RE or BI, as appropriate. 2. The Monitor shall immediately notify the PI (unless Monitor is the PI) of the 			

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	<p>discovery.</p> <ol style="list-style-type: none"> 3. The PI shall immediately notify City Staff by phone of the discovery, and shall also submit written documentation to City Staff within 24 hours by fax or email with photos of the resource in context, if possible. 4. No soil shall be exported off-site until a determination can be made regarding the significance of the resource specifically if Native American resources are encountered. <p>C. Determination of Significance</p> <ol style="list-style-type: none"> 1. The PI and Native American consultant/monitor, where Native American resources are discovered, shall evaluate the significance of the resource. <p>If Human Remains are involved, follow protocol in Section IV below.</p> <ol style="list-style-type: none"> (a) The PI shall immediately notify City Staff by phone to discuss significance determination and shall also submit a letter to City Staff indicating whether additional mitigation is required. (b) If the resource is significant, the PI shall submit an Archaeological Data Recovery Program which has been reviewed by the Native American consultant/monitor when applicable, and obtain written approval from City Staff and the Native American representative(s), if applicable. Impacts to significant resources must be mitigated before ground disturbing activities in the area of discovery will be allowed to resume. (c) If the resource is not significant, the PI shall submit a letter to City Staff indicating that artifacts will be collected, curated, and documented in the Final Monitoring Report. The letter shall also indicate that that no further work is required. <p>IV. Discovery of Human Remains</p> <p>If human remains are discovered, work shall halt in that area and no soil shall be exported off-site until a determination can be made regarding the provenance of the human remains; and the following procedures set forth in CEQA Section 15064.5(e), the California Public Resources Code (Sec. 5097.98) and State Health and Safety Code (Sec. 7050.5) shall be undertaken:</p>			

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Significant Impact(s)	Mitigation Measure(s)	Implementation		
		Time Frame	Responsibility	Verification Responsibility
	<p>A. Notification</p> <ol style="list-style-type: none"> 1. Archaeological Monitor shall notify the RE or BI as appropriate, City Staff, and the PI, if the Monitor is not qualified as a PI. City Staff will notify the appropriate Senior Planner in the Environmental Analysis Section of the Development Services Department to assist with the discovery process. 2. The PI shall notify the Medical Examiner after consultation with the RE, either in person or via telephone. <p>B. Isolate discovery site</p> <ol style="list-style-type: none"> 1. Work shall be directed away from the location of the discovery and any nearby area reasonably suspected to overlay adjacent human remains until a determination can be made by the Medical Examiner in consultation with the PI concerning the provenance of the remains. 2. The Medical Examiner, in consultation with the PI, will determine the need for a field examination to determine the provenance. 3. If a field examination is not warranted, the Medical Examiner will determine with input from the PI, if the remains are or are most likely to be of Native American origin. <p>C. If Human Remains are determined to be Native American</p> <ol style="list-style-type: none"> 1. The Medical Examiner will notify the NAHC within 24 hours. By law, ONLY the Medical Examiner can make this call. 2. NAHC will immediately identify the person or persons determined to be the Most Likely Descendent (MLD) and provide contact information. 3. The MLD will contact the PI within 24 hours or sooner after the Medical Examiner has completed coordination, to begin the consultation process in accordance with CEQA Section 15064.5(e) and the California Public Resources and Health & Safety Codes. 4. The MLD will have 48 hours to make recommendations to the property owner or representative, for the treatment or disposition with proper dignity, of the human remains and associated grave goods. 			

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	<p>5. Disposition of Native American Human Remains will be determined between the MLD and the PI, and if:</p> <p>(a) The NAHC is unable to identify the MLD, OR the MLD failed to make a recommendation within 48 hours after being notified by the Commission; OR;</p> <p>(b) The landowner or authorized representative rejects the recommendation of the MLD and mediation in accordance with PRC 5097.94 (k) by the NAHC fails to provide measures acceptable to the landowner, THEN,</p> <p>(c) In order to protect these sites, the Landowner shall do one or more of the following:</p> <p>(1) Record the site with the NAHC;</p> <p>(2) Record an open space or conservation easement on the site;</p> <p>(3) Record a document with the County.</p> <p>6. Upon the discovery of multiple Native American human remains during a ground disturbing land development activity, the landowner may agree that additional conferral with descendants is necessary to consider culturally appropriate treatment of multiple Native American human remains. Culturally appropriate treatment of such a discovery may be ascertained from review of the site utilizing cultural and archaeological standards. Where the parties are unable to agree on the appropriate treatment measures the human remains and buried with Native American human remains shall be reinterred with appropriate dignity, pursuant to Section 5.c., above.</p> <p>D. If Human Remains are not Native American</p> <p>1. The PI shall contact the Medical Examiner and notify them of the historic era context of the burial.</p> <p>2. The Medical Examiner will determine the appropriate course of action with the PI and City staff (PRC 5097.98).</p> <p>3. If the remains are of historic origin, they shall be appropriately removed and conveyed to the San Diego Museum of Man for analysis. The decision for internment of the human remains shall be made in consultation with City Staff, the</p>			

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	<p>applicant/landowner and the San Diego Museum of Man.</p> <p>V. Night and/or Weekend Work</p> <p>A. If night and/or work is included in the contract</p> <ol style="list-style-type: none"> 1. When night and/or weekend work is included in the contract package, the extent and timing shall be presented and discussed at the Precon Meeting. 2. The following procedures shall be followed. <ol style="list-style-type: none"> (a) No Discoveries <p>In the event that no discoveries were encountered during night and/or weekend work, the PI shall record the information on the CSVr and submit to City Staff via fax by 8 am of the next business day.</p> (b) Discoveries <p>All discoveries shall be processed and documented using the existing procedures detailed in Sections III - During Construction, and IV – Discovery of Human Remains. Discovery of human remains shall always be treated as a significant discovery.</p> (c) Potentially Significant Discoveries <p>If the PI determines that a potentially significant discovery has been made, the procedures detailed under Section III - During Construction and IV-Discovery of Human Remains shall be followed.</p> (d) The PI shall immediately contact City Staff, or by 8 am of the next business day to report and discuss the findings as indicated in Section III-B, unless other specific arrangements have been made. <p>B. If night and/or weekend work becomes necessary during the course of construction</p> <ol style="list-style-type: none"> 1. The Construction Manager shall notify the RE, or BI, as appropriate, a minimum of 24 hours before the work is to begin. 2. The RE, or BI, as appropriate, shall notify City Staff immediately. 			

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	<p>C. All other procedures described above shall apply, as appropriate.</p> <p>VI. Post Construction</p> <p>A. Submittal of Draft Monitoring Report</p> <ol style="list-style-type: none"> 1. The PI shall submit two copies of the Draft Monitoring Report (even if negative) prepared in accordance with the HRG and Appendices which describes the results, analysis, and conclusions of all phases of the Archaeological Monitoring Program (with appropriate graphics) to City Staff, for review and approval within 90 days following the completion of monitoring, <ol style="list-style-type: none"> (a) For significant archaeological resources encountered during monitoring, the Archaeological Data Recovery Program shall be included in the Draft Monitoring Report. (b) Recording sites with State of California Department of Parks and Recreation <p>The PI shall be responsible for recording (on the appropriate State of California Department of Park and Recreation forms-DPR 523 A/B) any significant or potentially significant resources encountered during the Archaeological Monitoring Program in accordance with the City's Historical Resources Guidelines, and submittal of such forms to the South Coastal Information Center with the Final Monitoring Report.</p> 2. City Staff shall return the Draft Monitoring Report to the PI for revision or, for preparation of the Final Report. 3. The PI shall submit revised Draft Monitoring Report to City Staff for approval. 4. City Staff shall provide written verification to the PI of the approved report. 5. City Staff shall notify the RE or BI, as appropriate, of receipt of all Draft Monitoring Report submittals and approvals. <p>B. Handling of Artifacts and Submittal of Collections Management Plan, if applicable</p> <ol style="list-style-type: none"> 1. The PI shall be responsible for ensuring that all cultural remains collected are cleaned and catalogued. 2. The PI shall be responsible for ensuring that all artifacts are analyzed to identify 			

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	<p>function and chronology as they relate to the history of the area; that faunal material is identified as to species; and that specialty studies are completed, as appropriate.</p> <p>3. The PI shall submit a Collections Management Plan to City Staff for review and approval for any project which results in a substantial collection of historical artifacts.</p> <p>C. Curation of artifacts: Accession Agreement and Acceptance Verification</p> <p>1. The PI shall be responsible for ensuring that all artifacts associated with the survey, testing and/or data recovery for this project are permanently curated with an appropriate institution. This shall be completed in consultation with City Staff and the Native American representative, as applicable.</p> <p>2. The PI shall include the Acceptance Verification from the curation institution in the Final Monitoring Report submitted to the RE or BI and City Staff.</p> <p>3. When applicable to the situation, the PI shall include written verification from the Native American consultant/monitor indicating that Native American resources were treated in accordance with state law and/or applicable agreements. If the resources were reinterred, verification shall be provided to show what protective measures were taken to ensure no further disturbance in accordance with section IV – Discovery of Human Remains, subsection 5.(d).</p> <p>D. Final Monitoring Report(s)</p> <p>1. The PI shall submit one copy of the approved Final Monitoring Report to the RE or BI as appropriate, and one copy to City Staff (even if negative), within 90 days after notification from City Staff that the draft report has been approved.</p> <p>2. The RE shall, in no case, issue the Notice of Completion until receiving a copy of the approved Final Monitoring Report from—City Staff which includes the Acceptance Verification from the curation institution.</p>			
LAND USE (LND)				

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Impact LU-B.2	Noise generated by I-5 and highly traveled grid streets could cause noise levels in noise-sensitive uses not governed by Title 24 to exceed 45 dB(A). (Direct)			
	Mitigation Measures NOI-B.1-1 and NOI-C.1.1, as described below.	Prior to Building Permit (Design) Prior to Certificate of Occupancy (Implementation)	Developer	Civic San Diego/City
Impact LU-B.3	Noise levels in Downtown areas within the 65 CNEL contour of SDIA could exceed 45 dB(A) for noise sensitive uses not covered by Title 24. (Direct)			
	Mitigation Measures NOI-B.1-1, as described below.	Prior to Building Permit (Design) Prior to Certificate of Occupancy (Implementation)	Developer	Civic San Diego/City
Impact LU-B.4	Noise generated by train horns, engines and wheels as well as bells at crossing gates would significantly disrupt sleep of residents along the railroad tracks. (Direct)			
	Mitigation Measure LU-B.4-1: Prior to approval of a Building Permit which would expose habitable rooms to disruptive railroad noise, an acoustical analysis shall be performed. The analysis shall determine the expected exterior and interior noise levels related to railroad activity. As feasible, noise attenuation measures shall be identified which would reduce noise levels to 45 dB(A) CNEL or less in habitable rooms. Recommended measures shall be incorporated into building plans before approval of a Building Permit.	Prior to Building Permit (Design) Prior to Certificate of Occupancy (Implementation)	Developer	City

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NOISE (NOI)				
Impact NOI-B.1	Noise generated by I-5 and highly traveled grid streets could cause interior noise levels in noise-sensitive uses (exclusive of residential and hotel uses) to exceed 45 dB(A). (Direct)			
	Mitigation Measure NOI-B.1-1: Prior to approval of a Building Permit for any residential, hospital, or hotel within 475 feet of the centerline of Interstate 5 or adjacent to a roadway carrying more than 7,000 ADT, an acoustical analysis shall be performed to confirm that architectural or other design features are included which would assure that noise levels within habitable rooms would not exceed 45 dB(A) CNEL.	Prior to Building Permit (Design) Prior to Certificate of Occupancy (Implementation)	Developer	Civic San Diego/City

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PALEONTOLOGICAL RESOURCES (PAL)				
Impact PAL-A.1	Excavation in geologic formations with a moderate to high potential for paleontological resources could have an significant impact on these resources, if present. (Direct)			
	<p>Mitigation Measure PAL-A.1-1: In the event the Secondary Study indicates the potential for significant paleontological resources, the following measures shall be implemented as determined appropriate by Civic San Diego.</p> <p>I. Prior to Permit Issuance</p> <p>A. Construction Plan Check</p> <ol style="list-style-type: none"> 1. Prior to NTP for any construction permits, including but not limited to, the first Grading Permit, Demolition Permits and Building Permits, but prior to the first preconstruction meeting, whichever is applicable, Centre City Development Corporation Civic San Diego shall verify that the requirements for paleontological monitoring have been noted on the appropriate construction documents. <p>B. Letters of Qualification have been submitted to Civic San Diego</p> <ol style="list-style-type: none"> 1. The applicant shall submit a letter of verification to Civic San Diego identifying the PI for the project and the names of all persons involved in the paleontological monitoring program, as defined in the City of San Diego Paleontology Guidelines. 2. Civic San Diego will provide a letter to the applicant confirming the qualifications of the PI and all persons involved in the paleontological monitoring of the project. 3. Prior to the start of work, the applicant shall obtain approval from Civic San Diego for any personnel changes associated with the monitoring program. <p>II. Prior to Start of Construction</p> <p>A. Verification of Records Search</p> <ol style="list-style-type: none"> 1. The PI shall provide verification to Civic San Diego that a site-specific records search has been completed. Verification includes, but is not limited to a copy of a confirmation letter from San Diego Natural History Museum, other institution or, 			

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	<p>if the search was in-house, a letter of verification from the PI stating that the search was completed.</p> <p>2. The letter shall introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities.</p> <p>B. PI Shall Attend Precon Meetings</p> <p>1. Prior to beginning any work that requires monitoring, the Applicant shall arrange a Precon Meeting that shall include the PI, CM and/or Grading Contractor, RE, BI, if appropriate, and Civic San Diego. The qualified paleontologist shall attend any grading/excavation related Precon Meetings to make comments and/or suggestions concerning the paleontological monitoring program with the Construction Manager and/or Grading Contractor.</p> <p>a. If the PI is unable to attend the Precon Meeting, the Applicant shall schedule a focused Precon Meeting with Civic San Diego, the PI, RE, CM or BI, if appropriate, prior to the start of any work that requires monitoring.</p> <p>2. Identify Areas to be Monitored</p> <p>a. Prior to the start of any work that requires monitoring, the PI shall submit a Paleontological Monitoring Exhibit (PME) based on the appropriate construction documents (reduced to 11 by 17 inches) to Civic San Diego identifying the areas to be monitored including the delineation of grading/excavation limits. The PME shall be based on the results of a site specific records search as well as information regarding existing known soil conditions (native or formation).</p> <p>3. When Monitoring Will Occur</p> <p>a. Prior to the start of any work, the PI shall also submit a construction schedule to Civic San Diego through the RE indicating when and where monitoring will occur.</p> <p>b. The PI may submit a detailed letter to Civic San Diego prior to the start of work or during construction requesting a modification to the monitoring program. This request shall be based on relevant information such as review of final construction documents which indicate conditions such as depth of</p>			

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	<p>excavation and/or site graded to bedrock, presence or absence of fossil resources, etc., which may reduce or increase the potential for resources to be present.</p> <p>III. During Construction</p> <p>A. Monitor Shall be Present During Grading/Excavation/Trenching</p> <ol style="list-style-type: none"> 1. The monitor shall be present full-time during grading/excavation/trenching activities as identified on the PME that could result in impacts to formations with high and moderate resource sensitivity. The Construction Manager is responsible for notifying the RE, PI, and Civic San Diego of changes to any construction activities. 2. The monitor shall document field activity via the CSV. The CSV's shall be faxed by the CM to the RE the first day of monitoring, the last day of monitoring, monthly (Notification of Monitoring Completion), and in the case of any discoveries. The RE shall forward copies to Civic San Diego. 3. The PI may submit a detailed letter to Civic San Diego during construction requesting a modification to the monitoring program when a field condition such as trenching activities that do not encounter formational soils as previously assumed, and/or when unique/unusual fossils are encountered, which may reduce or increase the potential for resources to be present. <p>B. Discovery Notification Process</p> <ol style="list-style-type: none"> 1. In the event of a discovery, the Paleontological Monitor shall direct the contractor to temporarily divert trenching activities in the area of discovery and immediately notify the RE or BI, as appropriate. 2. The Monitor shall immediately notify the PI (unless Monitor is the PI) of the discovery. 3. The PI shall immediately notify Civic San Diego by phone of the discovery, and shall also submit written documentation to Civic San Diego within 24 hours by fax or email with photos of the resource in context, if possible. <p>C. Determination of Significance</p>			

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	<ol style="list-style-type: none"> 1. The PI shall evaluate the significance of the resource. <ol style="list-style-type: none"> a. The PI shall immediately notify Civic San Diego by phone to discuss significance determination and shall also submit a letter to Civic San Diego indicating whether additional mitigation is required. The determination of significance for fossil discoveries shall be at the discretion of the PI. b. If the resource is significant, the PI shall submit a Paleontological Recovery Program and obtain written approval from Civic San Diego. Impacts to significant resources must be mitigated before ground disturbing activities in the area of discovery will be allowed to resume. c. If resource is not significant (e.g., small pieces of broken common shell fragments or other scattered common fossils) the PI shall notify the RE, or BI as appropriate, that a non-significant discovery has been made. The Paleontologist shall continue to monitor the area without notification to Civic San Diego unless a significant resource is encountered. d. The PI shall submit a letter to Civic San Diego indicating that fossil resources will be collected, curated, and documented in the Final Monitoring Report. The letter shall also indicate that no further work is required. <p>IV. Night Work</p> <ol style="list-style-type: none"> A. If night work is included in the contract <ol style="list-style-type: none"> 1. When night work is included in the contract package, the extent and timing shall be presented and discussed at the precon meeting. 2. The following procedures shall be followed. <ol style="list-style-type: none"> a. No Discoveries <p>(1)In the event that no discoveries were encountered during night work, The PI shall record the information on the CSVr and submit to Civic San Diego via fax by 9 a.m. the following morning, if possible.</p> b. Discoveries <p>(1)All discoveries shall be processed and documented using the existing</p> 			

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		Time Frame	Responsibility	Verification Responsibility
	<p>procedures detailed in Sections III - During Construction.</p> <p>c. Potentially Significant Discoveries</p> <p>(1) If the PI determines that a potentially significant discovery has been made, the procedures detailed under Section III - During Construction shall be followed.</p> <p>d. The PI shall immediately contact Civic San Diego, or by 8 a.m. the following morning to report and discuss the findings as indicated in Section III-B, unless other specific arrangements have been made.</p> <p>B. If night work becomes necessary during the course of construction</p> <p>1. The Construction Manager shall notify the RE, or BI, as appropriate, a minimum of 24 hours before the work is to begin.</p> <p>2. The RE, or BI, as appropriate, shall notify Civic San Diego immediately.</p> <p>C. All other procedures described above shall apply, as appropriate.</p> <p>V. Post Construction</p> <p>A. Submittal of Draft Monitoring Report</p> <p>1. The PI shall submit two copies of the Draft Monitoring Report (even if negative) which describes the results, analysis, and conclusions of all phases of the Paleontological Monitoring Program (with appropriate graphics) to Civic San Diego for review and approval within 90 days following the completion of monitoring,</p> <p>a. For significant paleontological resources encountered during monitoring, the Paleontological Recovery Program shall be included in the Draft Monitoring Report.</p> <p>b. Recording Sites with the San Diego Natural History Museum</p> <p>(1) The PI shall be responsible for recording (on the appropriate forms) any significant or potentially significant fossil resources encountered during the Paleontological Monitoring Program in accordance with the City's Paleontological Guidelines, and submittal of such forms to the San Diego Natural History Museum with the Final Monitoring Report.</p>			

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Significant Impact(s)	Mitigation Measure(s)	Implementation		
		Time Frame	Responsibility	Verification Responsibility
	<ol style="list-style-type: none"> 2. Civic San Diego shall return the Draft Monitoring Report to the PI for revision or, for preparation of the Final Report. 3. The PI shall submit revised Draft Monitoring Report to Civic San Diego for approval. 4. Civic San Diego shall provide written verification to the PI of the approved report. 5. Civic San Diego shall notify the RE or BI, as appropriate, of receipt of all Draft Monitoring Report submittals and approvals. <p>B. Handling of Fossil Remains</p> <ol style="list-style-type: none"> 1. The PI shall be responsible for ensuring that all fossil remains collected are cleaned and catalogued. 2. The PI shall be responsible for ensuring that all fossil remains are analyzed to identify function and chronology as they relate to the geologic history of the area; that faunal material is identified as to species; and that specialty studies are completed, as appropriate <p>C. Curation of fossil remains: Deed of Gift and Acceptance Verification</p> <ol style="list-style-type: none"> 1. The PI shall be responsible for ensuring that all fossil remains associated with the monitoring for this project are permanently curated with an appropriate institution. 2. The PI shall include the Acceptance Verification from the curation institution in the Final Monitoring Report submitted to the RE or BI and Civic San Diego. <p>D. Final Monitoring Report(s)</p> <ol style="list-style-type: none"> 1. The PI shall submit two copies of the Final Monitoring Report to Civic San Diego (even if negative), within 90 days after notification from Civic San Diego that the draft report has been approved. 2. The RE shall, in no case, issue the Notice of Completion until receiving a copy of the approved Final Monitoring Report from Civic San Diego which includes the Acceptance Verification from the curation institution. 			
TRAFFIC AND CIRCULATION (TRF)				

Downtown FEIR/SEIR Mitigation Monitoring and Reporting Program				
Significant Impact(s)	Mitigation Measure(s)	Implementation		
		Time Frame	Responsibility	Verification Responsibility
Impact TRF-A.1.1	Increased traffic on grid streets from Downtown development would result in unacceptable levels of service on specific roadway intersections and/or segments within downtown. (Direct)			
	Mitigation Measure TRF-A.1.1-2: Prior to approval of any development which would generate a sufficient number of trips to qualify as a large project under the Congestion Management Program (i.e. more than 2,400 daily trips, or 200 trips during a peak hour period), a traffic study shall be completed. The traffic study shall be prepared in accordance with City's Traffic Impact Study Manual. If the traffic study indicates that roadways substantially affected by the project would operate at LOS F with the addition of project traffic, the traffic study shall identify improvements to grid street segments and/or intersections consistent with the Downtown San Diego Mobility Plan which would be required within the next five years to achieve an acceptable LOS or reduce congestion, to the extent feasible. If the needed improvements are already included in the City of San Diego's CIP, or the equivalent, no further action shall be required. If any of the required improvements are not included in the CIP, or not expected within five years of project completion, the City of San Diego shall amend the CIP, within one year of project approval, to include the required improvements and assure that they will be implemented within five years of project completion. At Civic San Diego's discretion, the developer may be assessed a pro-rated share of the cost of improvements as a condition of project approval.	Prior to Development Permit (Design)	Developer	Civic San Diego/City
Impact TRF-A.2.1-1	Elimination of Cedar St. off-ramp would impact other freeway ramps by redirecting traffic to other off ramps serving downtown. (Direct)			
	Mitigation Measure TRF A.2.2-1: Prior to elimination of the Cedar Street off-ramp from I-5, a traffic study shall be done by Civic San Diego in consultation with the City of San Diego and Caltrans to determine the potential effects associated with elimination of the off-ramp and the conversion of Cedar Street from one- to two-way. The report shall also identify roadway modifications that would minimize potential impacts on local surface streets and I-5.	Prior to elimination of Cedar Street off-ramp (Design/ Implementation)	Civic San Diego/City	Civic San Diego/City