



THE CITY OF SAN DIEGO

TIERED MITIGATED NEGATIVE DECLARATION

Project No. 694291
SCH No. 2019060003

SUBJECT: Union/Newton Sites SDP/CDP: Site Development Permit and Coastal Development Permit for 1) the relocation of an historic house from Little Italy to Barrio Logan, 2) construction of a 24-story residential tower with 73 dwelling units (DU) (8 affordable) at 1620 Union St. in Little Italy, 3) construction of a 3-story mixed-use development with 8 DUs (1 affordable) and 4) the construction of a 7,949 square-foot warehouse at 2642-2648 Newton Ave. in Barrio Logan. APPLICANT: Jonathon Segal. LEGAL DESCRIPTION: (Union: The land referred to herein below is situated in the City of San Diego, Lot 8 in Block 33 of Middletown, in the City of San Diego, County of San Diego, State of California, according to partition map thereof made my J.E. Jackson on file in the office of the County Clerk of said San Diego County; Newton: The land referred to herein below is situated in the City of San Diego, County of San Diego, Lots 33 through 38, inclusive in block 12 of Reed and Hubbel's addition, in the City of San Diego, County of San Diego, State of California according to map thereof No. 327 filed in the Office of the recorder of San Diego, June 30, 1886.)

I. PROJECT DESCRIPTION:

See attached Tiered Initial Study.

II. ENVIRONMENTAL SETTING:

See attached Tiered Initial Study.

III. DOCUMENTATION:

The attached Tiered Initial Study documents the reasons to support the above Determination.

IV. MITIGATION, MONITORING AND REPORTING PROGRAM:

A. GENERAL REQUIREMENTS – PART I Plan Check Phase (prior to permit issuance or Notice to Proceed)

1. Prior to the issuance Bid Opening/Bid Award or beginning any construction related activity on-site, the Development Services Department (DSD) Director's Environmental Designee (ED) shall review and approve all Construction Documents (CD), (plans, specification, details, etc.) to ensure the MMRP requirements have been incorporated.
2. In addition, the ED shall verify that the MMRP Conditions/Notes that apply ONLY to the construction phases of this project are included VERBATIM, under the heading, "ENVIRONMENTAL/MITIGATION REQUIREMENTS."
3. These notes must be shown within the first three (3) sheets of the construction documents in the format specified for engineering construction document templates as shown on the City website:

<http://www.sandiego.gov/development-services/industry/information/standtemp.shtml>

4. The **TITLE INDEX SHEET** must also show on which pages the "Environmental/Mitigation Requirements" notes are provided.

B. GENERAL REQUIREMENTS – PART II

Post Plan Check (After permit issuance/Prior to start of construction)

1. **PRE-CONSTRUCTION MEETING IS REQUIRED TEN (10) WORKING DAYS PRIOR TO BEGINNING ANY WORK ON THIS PROJECT.** The PERMIT HOLDER/OWNER is responsible to arrange and perform this meeting by contacting the CITY RESIDENT ENGINEER (RE) of the Field Engineering Division and City staff from MITIGATION MONITORING COORDINATION (MMC). Attendees must also include the Permit holder's Representative(s), Job Site Superintendent and the following consultants: **LIST APPROPRIATE MONITORS HERE**

Note: Failure of all responsible Permit Holder's representatives and consultants to attend shall require an additional meeting with all parties present.

CONTACT INFORMATION:

- a) The PRIMARY POINT OF CONTACT is the **RE** at the **Field Engineering Division – 858-627-3200**
 - b) For Clarification of ENVIRONMENTAL REQUIREMENTS, it is also required to call **RE and MMC at 858-627-3360**
2. **MMRP COMPLIANCE:** This Project, Project Tracking System (PTS) 694291, shall conform to the mitigation requirements contained in the associated Environmental Document and implemented to the satisfaction of the DSD's ED, MMC and the City Engineer (RE). The requirements may not be reduced or changed but may be annotated (i.e. to explain when and how compliance is being met and location of verifying proof, etc.). Additional clarifying information may also be added to other relevant plan sheets and/or specifications as appropriate (i.e., specific locations, times of monitoring, methodology, etc.)

Note: Permit Holder’s Representatives must alert RE and MMC if there are any discrepancies in the plans or notes, or any changes due to field conditions. All conflicts must be approved by RE and MMC BEFORE the work is performed.

3. **OTHER AGENCY REQUIREMENTS:** Evidence that any other agency requirements or permits have been obtained or are in process shall be submitted to the RE and MMC for review and acceptance prior to the beginning of work or within one week of the Permit Holder obtaining documentation of those permits or requirements. Evidence shall include copies of permits, letters of resolution or other documentation issued by the responsible agency. *Not Applicable for this project OR IDENTIFY APPROPRIATE AGENCY PERMITS NEEDED .*
4. **MONITORING EXHIBITS:** All consultants are required to submit, to RE and MMC, a monitoring exhibit on a 11x17 reduction of the appropriate construction plan, such as site plan, grading, landscape, etc., marked to clearly show the specific areas including the LIMIT OF WORK, scope of that discipline’s work, and notes indicating when in the construction schedule that work will be performed. When necessary for clarification, a detailed methodology of how the work will be performed shall be included.
5. **OTHER SUBMITTALS AND INSPECTIONS:** The Permit Holder/Owner’s representative shall submit all required documentation, verification letters, and requests for all associated inspections to the RE and MMC for approval per the following schedule:

DOCUMENT SUBMITTAL/INSPECTION CHECKLIST		
Issue Area	Document Submittal	Associated Inspection/ Approvals/Notes
General	Consultant Qualification Letters	Prior to Preconstruction Meeting
General	Consultant Construction Monitoring Exhibits	Prior to or at Preconstruction Meeting
Bond Release	Request for Bond Release Letter	Final MMRP Inspections Prior to Bond Release Letter

C. SPECIFIC ISSUE AREA CONDITIONS/REQUIREMENTS:

CULTURAL RESOURCES (ARCHITECTURAL RESOURCES)

HIST-1 MONITORING

1. Preconstruction Meeting [City Historic Resources staff, Developer/Construction Manager (D/CM), Project Architect (PA), Historic Architect & Monitor (HA), Relocation Contractor (RC), General Contractor (GC), Building Inspector (BI)]
 - a. Overview of Treatment Plan and Monitoring Plan as related to the historic resource on Site A

- b. Overview of architectural, landscape, and engineering documents as related to Site B. Also visit Site B.
 - c. Review work required to prepare the site for arrival of the building.
- 2. Preparation of structure for moving (D/CM, HA)
 - a. Architect/Monitor to be present to observe removal of the masonry foundation, chimneys, and front steps. Other items, including disconnection/capping of utility connection, removal of exterior plumbing and electrical lines, removal non- historic porch enclosure, which are required for the relocation, shall be complete prior to the Preconstruction Meeting.
- 3. Pre-Move (D/CM, HA, RC, GC)
 - a. Observe temporary shoring and protection.
 - b. Review storage of salvaged building materials.
 - c. Approve structure as ready for relocation.
 - d. Review preparation work at Site B prior to relocation of building for new footings, foundation, utilities, and site preparation.
- 4. Move to Site B (D/CM, HA, RC, BI)
 - a. Review building relocation. Review overall Treatment Plan for rehabilitation of building as well as architectural, landscape, and engineering documents prior to commencement of relocation.
- 5. Continued Monitoring During Rehabilitation (D/CM, PA, HA, GC)
 - a. Monitoring to occur as required during rehabilitation.
 - b. Complete Consultant Site Visit Record forms, as needed.
 - c. Observe rehabilitation of the building in accordance with the Treatment Plan and approved architectural, landscape, and engineering documents.
- 6. Final Monitoring (D/CM, PA, HA)
 - a. Prepare final punch list of items to complete according to the Treatment Plan and architectural, landscape, and engineering documents.
- 7. Draft Monitoring Report (HA,BI)

- a. Draft report of monitoring process to be submitted to the BI for review following completion of rehabilitation.
8. Final Monitoring Report (D/CM, HA, BI)
- a. Final Monitoring Report, review relevant documents with the BI to confirm compliance with the Site Development Permit following review and acceptance of the Draft Monitoring Report.

HIST-2 PREPARATION, RELOCATION, & REHABILITATION REQUIREMENTS

RELOCATION/RESTORATION STRATEGY: Prior to the development of the 1620 Union site the Andrew Cassidy home will be relocated to its new location at 2642 Newton Ave. The main structure will be transported in two pieces. Approximately 8 feet of roof will be removed and transported separately to accommodate overhead MTS trolley lines.

The future tenant of the restored home has not yet been identified however the proposed future use of the building will not change its occupancy classification from residential. The proposed site improvements include the addition of landscaping and new front stoops. Modifications to the Andrew Cassidy Residence shall be in compliance with *The Secretary of the Interior's Standards for the Treatment of Historic Properties* (The Standards), specifically *The Standards for Restoration*.

PREPARATION, RELOCATION, & RESTORATION REQUIREMENTS:

1. Preparation of the Structure Prior to Relocation:

Coordination Meeting & Monitoring: Prior to the start of any work the Project Architect and Historic Architect / Monitor shall meet on site with the moving contractor to review the scope of demolition, removal, salvage, temporary shoring and relocation. Through the course of all work, the moving contractor shall notify the Historic Architect / Monitor of discovery of any architectural elements on site. The Historic Architect / Monitor shall evaluate the significance of such material prior to determining the appropriate treatment in compliance with *The Secretary of the Interior's Standards for Restoration*.

Construction monitoring shall be provided prior to preparation of the building for relocation. The Construction Monitor shall provide a Consultant Site Visit Record summarizing the field conditions and any recommendations for compliance with *The Standards*.

Temporary Shoring: The moving contractor shall provide and maintain necessary shoring to protect and stabilize the building during the relocation. Means and methods for temporary shoring will be determined by the moving contractor and the implementation of these procedures shall occur after review by the Project Architect. The mover shall outline any proposed points of entry and attachment for anchors or beams. Historic siding or trim affected by the attachment of temporary shoring shall be removed prior to installation of shoring, catalogued, labeled and securely stored in a weathertight lockable container pending reinstallation at the final site.

Roof: Roofing shingles will be removed and roof 2x4s will be cut approximately 18" above the interior attic floor. The material above 18" will be disposed of. Below the 18" cut line all roofing and structure will remain in tact. The front gable will be disconnected from the attic 2x8 joists and plywood, braced and laid down flat onto the attic floor and secured horizontally for transport.

Windows: All windows shall be protected by ¾" exterior grade plywood prior to relocation installed without causing damage to the existing historic windows, frames, and trim.

Doors: The single existing historic exterior door at the front façade of the building shall be protected in place.

Cast in Place Concrete Foundation: The existing cast in place concrete foundation is non-original and will be demolished after the building relocation.

Chimneys: Prior to Relocation, the historic brick chimney located at the ridge of the gabled roof shall be disassembled above the roofline. Prior to disassembly the chimney shall be measured and photo documented. All documentation will be submitted to the City for review and approval prior to removal of the chimney. The brick shall be catalogued, salvaged and stored for reinstallation at the final site. All salvaged items will be stored on labeled and wrapped pallets and secured in a weather tight lockable steel container that will be located at the relocation site adjacent to the building.

Front Steps and Porch: The front porch, including the porch floor, balustrade, columns, roof, trim, railings, and decorative elements shall be protected in place and securely shored in order to facilitate the structure relocation. The non-original front porch portion to the north of the porch roof will be disassembled and removed.

Rear Porch: The raised wood deck and stairs are non-original and will be demolished prior to relocation.

Side Ramp: The wood side ramp is non-original and and will be demolished prior to relocation.

2. **Relocation Procedures:** The Andrew Cassidy Home will be moved approximately 3.1 miles to its new site location at 2642 Newton Avenue San Diego, CA 92113. The building will be moved in two pieces and Restoration will commence.

The mover shall outline the route, schedule, and sequence of the move as well as the means by which the building will be secured for relocation. The Historic Architect / Monitor and City Staff shall approve the plan prior to the relocation date.

Monitoring: Construction monitoring shall be provided during the relocation process when the building is moved to its new location. Following each site visit, the Monitor shall provide a Consultant Site Visit Record summarizing field conditions and any recommendations for compliance with The Standards.

3. **Building Restoration:** Following the relocation of the Andrew Cassidy Home, the exterior of the structure will be restored in accordance with The Secretary of the Interior's Standards for Restoration.

The foundation

Construction Monitoring: Periodic construction monitoring shall be provided during the restoration process. Following each site visit, the construction monitor shall provide a Consultant Site Visit Record summarizing field conditions and any recommendations for compliance with *The Standards*.

Restoration Design: The future restoration of the building shall be completed in accordance with The Standards. The design team shall include the services of a historic architect that meets the Secretary of the Interior's Professional Qualification Standards. The restoration design will require review and approval by the City of San Diego Development Services Department and the Historical Resources Board staff and or Design Assistance Subcommittee.

ARCHAEOLOGICAL RESOURCES

I. Prior to Permit Issuance

A. Entitlements Plan Check

1. Prior to issuance of any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits or a Notice to Proceed for Subdivisions, but prior to the first preconstruction meeting, whichever is applicable, the Assistant Deputy Director (ADD) Environmental designee shall verify that the requirements for Archaeological Monitoring and Native American monitoring have been noted on the applicable construction documents through the plan check process.

B. Letters of Qualification have been submitted to ADD

1. The applicant shall submit a letter of verification to Mitigation Monitoring Coordination (MMC) identifying the Principal Investigator (PI) for the project and the names of all persons involved in the archaeological monitoring program, as defined in the City of San Diego Historical Resources Guidelines (HRG). If applicable, individuals involved in the archaeological monitoring program must have completed the 40-hour HAZWOPER training with certification documentation.
2. MMC will provide a letter to the applicant confirming 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 MMC for any personnel changes associated with the monitoring program.

II. Prior to Start of Construction

A. Verification of Records Search

1. The PI shall provide verification to MMC 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 MMC requesting a reduction to the ¼ mile radius.

B. PI Shall Attend Precon Meetings

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), Construction Manager (CM) and/or Grading Contractor, Resident Engineer (RE), Building Inspector (BI), if appropriate, and MMC. The qualified Archaeologist and Native American 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 MMC, the PI, RE, CM or BI, if appropriate, prior to the start of any work that requires monitoring.
2. Identify Areas to be Monitored
 - a. Prior to the start of any work that requires monitoring, the PI shall submit an Archaeological Monitoring Exhibit (AME) (with verification that the AME has been reviewed and approved by the Native American consultant/monitor when Native American resources may be impacted) based on the appropriate construction documents (reduced to 11x17) to MMC 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).
3. When Monitoring Will Occur

- a. Prior to the start of any work, the PI shall also submit a construction schedule to MMC through the RE indicating when and where monitoring will occur.
- b. The PI may submit a detailed letter to MMC 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 the potential for resources to be present.

III. During Construction

A. Monitor(s) Shall be Present During Grading/Excavation/Trenching

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 MMC of changes to any construction activities such as in the case of a potential safety concern within the area being monitored. In certain circumstances OSHA safety requirements may necessitate modification of the AME.
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 MMC. If prehistoric resources are encountered during the Native American consultant/monitor's absence, work shall stop and the Discovery Notification Process detailed in Section III.B-C and IV.A-D shall commence.
3. The PI may submit a detailed letter to MMC 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.
4. The archaeological and Native American consultant/monitor shall document field activity via the Consultant Site Visit Record (CSVR). The CSVR'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 MMC.

B. Discovery Notification Process

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 discovery.
3. The PI shall immediately notify MMC by phone of the discovery, and shall also submit written documentation to MMC 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.

C. Determination of Significance

1. The PI and Native American consultant/monitor, where Native American resources are discovered shall evaluate the significance of the resource. If Human Remains are involved, follow protocol in Section IV below.
 - a. The PI shall immediately notify MMC by phone to discuss significance determination and shall also submit a letter to MMC indicating whether additional mitigation is required.
 - b. If the resource is significant, the PI shall submit an Archaeological Data Recovery Program (ADRP) which has been reviewed by the Native American consultant/monitor, and obtain written approval from MMC. Impacts to significant resources must be mitigated before ground disturbing activities in the area of discovery will be allowed to resume. Note: If a unique archaeological site is also an historical resource as defined in CEQA, then the limits on the amount(s) that a project applicant may be required to pay to cover mitigation costs as indicated in CEQA Section 21083.2 shall not apply.
 - c. If the resource is not significant, the PI shall submit a letter to MMC 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.

IV. Discovery of Human Remains

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 as 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:

A. Notification

1. Archaeological Monitor shall notify the RE or BI as appropriate, MMC, and the PI, if the Monitor is not qualified as a PI. MMC will notify the appropriate Senior Planner in the Environmental Analysis Section (EAS) of the Development Services Department to assist with the discovery notification process.
2. The PI shall notify the Medical Examiner after consultation with the RE, either in person or via telephone.

B. Isolate discovery site

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.

C. If Human Remains ARE determined to be Native American

1. The Medical Examiner will notify the Native American Heritage Commission (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), 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.

5. Disposition of Native American Human Remains will be determined between the MLD and the PI, and, if:
 - a. The NAHC is unable to identify the MLD, OR the MLD failed to make a recommendation within 48 hours after being granted access to the site, OR;
 - 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, the landowner shall reinter the human remains and items associated with Native American human remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance, THEN
 - c. To protect these sites, the landowner shall do one or more of the following:
 - (1) Record the site with the NAHC;
 - (2) Record an open space or conservation easement; or
 - (3) Record a document with the County. The document shall be titled "Notice of Reinterment of Native American Remains" and shall include a legal description of the property, the name of the property owner, and the owner's acknowledged signature, in addition to any other information required by PRC 5097.98. The document shall be indexed as a notice under the name of the owner.

V. Night and/or Weekend Work

- A. If night and/or weekend work is included in the contract
 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.
 - a. No Discoveries

In the event that no discoveries were encountered during night and/or weekend work, the PI shall record the information on the CSV and submit to MMC via fax by 8AM of the next business day.
 - b. Discoveries

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.

c. Potentially Significant Discoveries

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.

- d. The PI shall immediately contact MMC, or by 8AM of the next business day to report and discuss the findings as indicated in Section III-B, unless other specific arrangements have been made.

B. If night and/or weekend work becomes necessary during the course of construction

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 MMC immediately.

C. All other procedures described above shall apply, as appropriate.

VI. Post Construction

A. Preparation and Submittal of Draft Monitoring Report

1. The PI shall submit two copies of the Draft Monitoring Report (even if negative), prepared in accordance with the Historical Resources Guidelines (Appendix C/D) which describes the results, analysis, and conclusions of all phases of the Archaeological Monitoring Program (with appropriate graphics) to MMC for review and approval within 90 days following the completion of monitoring. It should be noted that if the PI is unable to submit the Draft Monitoring Report within the allotted 90-day timeframe resulting from delays with analysis, special study results or other complex issues, a schedule shall be submitted to MMC establishing agreed due dates and the provision for submittal of monthly status reports until this measure can be met.

- 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

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.

2. MMC 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 MMC for approval.
 4. MMC shall provide written verification to the PI of the approved report.
 5. MMC shall notify the RE or BI, as appropriate, of receipt of all Draft Monitoring Report submittals and approvals.
- B. Handling of Artifacts
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 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.
 3. The cost for curation is the responsibility of the property owner.
- C. Curation of artifacts: Accession Agreement and Acceptance Verification
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 MMC and the Native American representative, as applicable.
 2. The PI shall include the Acceptance Verification from the curation institution in the Final Monitoring Report submitted to the RE or BI and MMC.
 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 occurs in accordance with Section IV – Discovery of Human Remains, Subsection 5.
- D. Final Monitoring Report(s)
1. The PI shall submit one copy of the approved Final Monitoring Report to the RE or BI as appropriate, and one copy to MMC (even if negative), within 90 days after notification from MMC that the draft report has been approved.

2. The RE shall, in no case, issue the Notice of Completion and/or release of the Performance Bond for grading until receiving a copy of the approved Final Monitoring Report from MMC which includes the Acceptance Verification from the curation institution.

V. PUBLIC REVIEW DISTRIBUTION:

Draft copies or notice of this Tiered Mitigated Negative Declaration were distributed to:

State

State Clearinghouse
Native American Heritage Commission

City

Central Library
Development Services
 EAS
 Historic Resources
 Transportation Development
 Engineering
 Planning Review
 Water & Sewer Development
 Urban Division
Planning Department
 Long Range Planning
Historic Resources Board

Other Interested Organizations, Groups, and Individuals

Barrio Logan Planning Group
Barrio Station Inc.
Harborview Community Council
Downtown San Diego Partnership
Gaslamp Quarter Council
Downtown Community Planning Council
Historical Resources Board
South Coastal Information Center
San Diego History Center
San Diego Archaeological Center
Save Our Heritage Organization
San Diego County Archaeological Society, Inc.
Sierra Club San Diego Chapter
Carmen Lucas
Ron Christman
Clint Linton
Frank Brown – Inter-Tribal Cultural Resources Council
Campo Band of Mission Indians

VI. RESULTS OF PUBLIC REVIEW:

- No comments were received during the public input period.
- Comments were received but did not address the accuracy or completeness of the draft environmental document. No response is necessary and the letters are incorporated herein.
- Comments addressing the accuracy or completeness of the draft environmental document were received during the public input period. The letters and responses are incorporated herein.

Copies of the tiered environmental document and associated project-specific technical appendices, if any, may be accessed on the City of San Diego's California Environmental Quality Act (CEQA) webpage at <https://www.sandiego.gov/ceqa>.



Jeff Szymanski
Senior Planner
Development Services Department

2/7/2022
Date of Draft Report

Date of Final Report

Analyst: C. Holowach

Attachments:

- Initial Study
- List of Acronyms
- Figure 1
- Figure 2
- Figure 3
- Figure 4

TIERED INITIAL STUDY CHECKLIST

1 INTRODUCTION

1.1 Tiered Initial Study

Pursuant to Section 15063 of the California Environmental Quality Act (CEQA) Guidelines (Title 14, California Code of Regulations, Sections 15000 et seq.), an Initial Study is a preliminary environmental analysis that is used by the lead agency as a basis for determining whether an EIR, a Mitigated Negative Declaration, or a Negative Declaration is required for a project. The CEQA Guidelines require that an Initial Study contain a project description, description of environmental setting, identification of environmental effects by checklist or other similar form, explanation of environmental effects, discussion of mitigation for significant environmental effects, evaluation of the project's consistency with existing, applicable land use controls, and the name of persons who prepared the study.

1.2 Tiering Process

This environmental analysis is a Tiered Initial Study for the proposed Union/Newton Sites SDP/CDP (referred to as the "proposed project" or "project" throughout this document). This environmental analysis is tiered from the *Complete Communities: Housing Solutions and Mobility Choices Program EIR* in accordance with Sections 15152 and 15168 of the CEQA Guidelines and Public Resources Code Section 21094. The *Complete Communities: Housing Solutions and Mobility Choices Program EIR* was prepared pursuant to Section 15168 of the CEQA Guidelines.

The Complete Communities Housing Solutions (Housing Program) amended the San Diego Municipal Code (SDMC) to implement the Housing Program through the addition of a new division, Chapter 4, Article 3, Division 10, Complete Communities Housing Solutions Regulations. Future development projects that provide affordable housing would be permitted additional square footage and building height that would allow for additional units beyond what is otherwise permitted in the respective base zone, Planned District Ordinance, or Community Plan. In exchange for the additional density, building square-footage, and height, the Housing Program would require projects to provide new community-serving infrastructure improvements through either payment of a fee into a Neighborhood Enhancement Fund or by accommodating a public promenade that meets specified standards outlined in SDMC Section 143.1020 and the supplemental development standards in SDMC Section 143.1025.

The CEQA concept of "tiering" refers to the evaluation of general environmental matters in a broad program-level EIR, with subsequent focused environmental documents for individual projects that implement the program. This environmental document incorporates by reference the discussions in the *Complete Communities: Housing Solutions and Mobility Choices Program EIR* and concentrates on project-specific issues. CEQA and the CEQA Guidelines encourage the use of tiered environmental documents to reduce delays and excessive paperwork in the environmental review process. This is

accomplished in tiered documents by eliminating repetitive analyses of issues that were adequately addressed in the Program EIR and by incorporating those analyses by reference.

Section 15168(d) of the State CEQA Guidelines provides for simplifying the preparation of environmental documents on individual parts of the program by incorporating by reference analyses and discussions that apply to the program as a whole. Where an EIR has been prepared or certified for a program or plan, the environmental review for a later activity consistent with the program or plan should be limited to effects that were not analyzed as significant in the prior EIR or that are susceptible to substantial reduction or avoidance (CEQA Guidelines Section 15152[d]).

1.3 Appropriateness of a Tiered Initial Study

The proposed project would be consistent with the scope of the program as described in the *Complete Communities: Housing Solutions and Mobility Choices Program EIR*. Accordingly, pursuant to Section 15152 of the State CEQA Guidelines, it is appropriate to tier this Initial Study from the *Complete Communities: Housing Solutions and Mobility Choices Program EIR*. This Tiered Initial Study evaluates whether the environmental effects of the proposed project were adequately addressed in the *Complete: Housing Solutions and Mobility Choices Program EIR*. For impacts that were adequately addressed, the Tiered Initial Study provides a cross reference to the relevant discussion in the *Complete Communities: Housing Solutions and Mobility Choices Program EIR*. Project-specific impacts that were not addressed in the *Complete Communities: Housing Solutions and Mobility Choices Program EIR*, are evaluated in detail in this Document. Project-specific mitigation has been identified where required.

2 PROJECT INFORMATION

- 2.1 Project title/Project number: Union/Newton Sites SDP/CDP / 694291
- 2.2 Lead agency name and address: City of San Diego, 1222 First Avenue, MS-501, San Diego, California 92101
- 2.3 Contact person and phone number: Courtney Holowach / (619) 446-5187
- 2.4 Project location: 1620 Union Street San Diego, CA 92101 and 2642-2648 Newton Avenue, San Diego, CA 92104
- 2.5 Project Applicant/Sponsor's name and address: Matthew Segal, 3000 Upas Street, Suite 101, San Diego, CA 92104
- 2.6 General/Community Plan designation: Downton and Barrio Logan
- 2.7 Zoning: CCPD-R and BLPD-SUBD-A
- 2.8 Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):
None required

3 PROJECT DESCRIPTION

3.1 Environmental setting and surrounding land uses:

The proposed project is located at 1620 Union Street in the Downtown Community Plan area and 2642-2648 Newton Avenue in the Barrio Logan Community Plan area. The 1620 Union Street site is on the west side of Union Street between West Date and West Cedar streets 2642-2648 Newton Avenue on the north side of Newton Avenue between South 26th and South 27th streets. The zoning for the Union site is CCPD-R and the zoning for the Newton site is BLPD-SUBD-A. The Union site is situated amongst similar residential uses across the street from a hotel. The Newton site currently contains an asphalt storage lot.

3.2 Description of project (Describe the whole action involved, including but not limited to, later phases of the project, and any secondary, support, or off-site features necessary for its implementation.):

The Project consists of a Site Development Permit (SDP) for the relocation of a designated historical resource, the Andrew Cassidy Home (Historical Resources Board No. 283), from 1620 Union Street in the Downtown Community Plan area (Council District 3) to 2642-2648 Newton Avenue in the Barrio Logan Community Plan area (Council District 8) and a Coastal Development Permit (CDP) for new construction at 2642-2648 Newton Avenue within the Coastal Overlay Zone. The historic Andrew Cassidy Home was constructed in 1888 and was designated as a historic resource by the City of San Diego in 1990. The project proposes to relocate the Andrew Cassidy Home to the 21,042 square foot receiver site at 2642-2648 Newton Avenue. The receiver site is on the north side of Newton Avenue between South 26th and South 27th streets, which currently contains an industrial storage asphalt lot. Along with the relocation of the historical resource, to the Newton Avenue site the project would also construct a three-story, 33-foot-9-inch-tall mixed-use building containing 14 dwelling units (including two affordable units), and 8,975 square feet of warehouse space.

The front half of the lot along Newton Avenue would contain the historical resource and space for future development or a receiver site for two additional historical resources. The warehouse space is located at the rear half of the lot, with the residential units encapsulating it on the south and west sides. Eight studio units are proposed, five one-bedrooms, and one two-bedroom unit. The proposed mixed-use building is characterized by the use of white/cream stucco with a sand finish, concrete block, and rustic metal panels. A 24-foot curb-cut and driveway is proposed for vehicular access off Newton Avenue and a warehouse vehicle entry is also proposed for access from the rear alley. Proposed public improvements in the right-of-way include upgraded sidewalks and five street trees with tree grates.

Once the historical resource is moved from the 5,013 square foot donor site at 1620 Union Street the project would construct a 24-story, 250-foot tall residential tower development containing 73 dwelling units (including eight affordable units) and 70 parking spaces within a fully-automated parking garage incorporated into levels 1 through 6. The ground level contains the residential lobby and the car elevator of the automated parking garage.

Residential units are contained on levels 2 through 23 and would include ten studio units, 47 one-bedroom units, 15 two-bedroom units, and one three-bedroom unit. The tower is characterized primarily by glazing and board form concrete and accented by metal panels of various colors. Level 24 contains a 600 SF common area roof deck with a rooftop tree. At the ground level in the right-of-way, a ten-foot curb-cut is proposed for vehicular access off Union Street and the sidewalks will be upgraded to be consistent with the Centre City Streetscape Manual for sidewalks in the Little Italy neighborhood.

- 3.3 Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, has consultation begun?

See Section 6.8 of the Initial Study

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21083.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

4 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

- | | | |
|--|---|---|
| <input type="checkbox"/> Land Use | <input type="checkbox"/> Air Quality | <input type="checkbox"/> Biological Resources |
| <input type="checkbox"/> Energy | <input type="checkbox"/> Geology, Soils, and Seismicity | <input type="checkbox"/> Greenhouse Gas Emissions |
| <input type="checkbox"/> Health and Safety | <input checked="" type="checkbox"/> Historical, Archaeological, and Tribal Cultural Resources | <input type="checkbox"/> Hydrology/Water Quality |
| <input type="checkbox"/> Noise | <input type="checkbox"/> Paleontological Resources | <input type="checkbox"/> Public Services and Facilities |
| <input type="checkbox"/> Public Utilities and Infrastructure | <input type="checkbox"/> Transportation | <input type="checkbox"/> Wildfire |
| <input type="checkbox"/> Visual Effects and Neighborhood Character | <input type="checkbox"/> Mandatory Findings of Significance | |

5 DETERMINATION (To be completed by Lead Agency)

On the basis of this initial evaluation:

- The proposed project COULD NOT have a significant effect on the environment, and a TIERED NEGATIVE DECLARATION will be prepared.
- Although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A TIERED MITIGATED NEGATIVE DECLARATION will be prepared.
- The proposed project MAY have a significant effect on the environment, and a (SUBSEQUENT/SUPPLEMENTAL) ENVIRONMENTAL IMPACT REPORT is required.
- The proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect (a) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (b) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. A (SUBSEQUENT/SUPPLEMENTAL) ENVIRONMENTAL IMPACT REPORT is required but must analyze only the effects that remain to be addressed.

6 EVALUATION OF ENVIRONMENTAL IMPACTS

The City of San Diego has defined the column headings in the Tiered Initial Study Checklist as follows:

1. "Potentially Significant Impact" is appropriate if there is substantial evidence that the project's effect may be significant. If there is one or more "Potentially Significant Impact" entries a Project EIR will be prepared.
2. "Project Impact Adequately Addressed in PEIR" applies where the potential impacts of the proposed project were adequately addressed in the *Complete Communities: Housing Solutions and Mobility Choices Program EIR* Mitigation Measures, as specified in the analysis, will mitigate any impacts of the proposed project to the extent feasible. The potential impact of the proposed project is adequately addressed in the *Complete Communities: Housing Solutions and Mobility Choices Program EIR*. The impact analysis in this document summarizes and cross references (including section/page numbers) the relevant analysis in the *Complete Communities: Housing Solutions and Mobility Choices Program EIR*.
3. "Less Than Significant with Project-level Mitigation Incorporated" applies where the incorporation of project-specific mitigation measures will reduce an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." All project-specific mitigation measures must be described, including a brief explanation of how the measures reduce the effect to a less than significant level.
4. "Less Than Significant Impact" applies where the project will not result in any significant effects. The effects may or may not have been discussed in the *Complete Communities: Housing Solutions and Mobility Choices Program EIR*. The project impact is less than significant without the incorporation of project-specific mitigation.
5. "No Impact" applies where a project would not result in any impact in the category in question or the category simply does not apply. "No Impact" answers do not require an explanation if they are adequately supported by the information sources cited by the lead agency which show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
6. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
7. The discussion in each issue should include the following:
 - Discussion of *Complete Communities: Housing Solutions and Mobility Choices Program EIR* impact (direct and cumulative) conclusions
 - Discussion of potential project impacts
 - Additional project-level mitigation measures
 - Significance determination after all mitigation
8. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
9. Supporting Information Sources: A source list should be attached, and other sources utilized, or individuals contacted should be cited in the discussion.

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
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6.1. LAND USE – Would the project:

Issue 1: Cause a significant environmental impact due to a conflict with any land use plan, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Complete Communities PEIR

The PEIR determined land use designations and policies associated with the Complete Communities Housing Solutions and Mobility Choices Program are consistent with the City’s overarching policy and regulatory documents including the General Plan and SDMC. Additionally, the PEIR is consistent with applicable goals objectives, or guidelines of the General Plan and other applicable plans and regulations and impacts would be less than significant.

Project

The Downtown Community Plan identifies the donor site for residential uses and the receiving site as residential. Relocating the Andrew Cassidy Home from the donor site to the receiving site is consistent with both Community Plans. The General Plan identifies both sites as residential, and the relocation of a single-family home and the development of 87 dwelling units is consistent with that designation. No impacts would result.

Project Cumulative

As discussed above proposed project is consistent with the land use designations of the underlying community plans. No impacts would result as result of the implementation of the project. Based upon the above analysis and information, there is no evidence that the proposed project would have any cumulative effects related to impacts due to a conflict with any land use plan, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

Issue 2: Lead to the development or conversion of General Plan or community designated open space or prime farmland to a more intensive land use, resulting in a physical division of the community?

Complete Communities PEIR

The Complete Communities PEIR determined that the project areas do not contain land designated as Prime Farmland. Further, the PEIR did not include the development or redesignation of open space; therefore, there would be no impacts associated with the development or conversion of

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
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General Plan- or community plan-designated Open Space or Prime Farmland, and the impacts would, therefore, be less than significant.

Project

Both project sites are located in fully developed urban environments and are surrounded by existing buildings and streets. Neither project site contains community designated open space or prime farmland. Agricultural land is not present on the sites or in the general vicinity. No impact would result.

Project Cumulative

As discussed above the proposed project sites do not contain community designated open space or prime farmland. Agricultural lands are not present on the sites or in the general vicinity. Based on the above analysis and information, there is no evidence that the proposed project would cause a cumulative impact of development or conversion of General Plan or community designated open space or prime farmland to a more intensive land use, resulting in a physical division of the community.

Issue 3: Result in land uses which are not compatible with an adopted airport land use compatibility plan?

Complete Communities PEIR

The Complete Communities PEIR determined that implementation of the Complete Communities program would not result in impacts associated with existing ALUCPs, because future development would continue to be limited by airport land use compatibility policies and regulations. Until the policies of the SDIA and NOLF Imperial Beach ALUCPs are incorporated into the City's ALUCOZ, future multi-family development within TPAs located within SDIA or NOLF Imperial Beach AIA Review Area 1 will be subject to ALUC review of the development's consistency with ALUCP policies for all compatibility factors; projects within AIA Review Area 2 for these airports will be subject to review for all compatibility factors; projects within AIA Review Area 2 for these airports will be subject to review against overflight and airspace projection policies and may require FAA notification (if the proposed development project's maximum height exceeds the FAA's Part 77 Notification Surface) and/or recordation of an aviation easement subject to the City's AAOZ and Airport Environs Overlay Zone, which provides supplemental regulations for property surrounding SDIA. After incorporation of the policies of the SDIA and NOLF Imperial Beach ALUCPs into the ALUCOZ, development allowed by the proposed project will be subject to the requirements of the ALUCOZ.

Future development allowed under the proposed project within the AIAs for Brown Field, Montgomery Field, and MCAS Miramar will be subject to the regulations of the ALUCOS, which implements the policies of the applicable ALUCP's regarding noise, safety, airspace protection, and aircraft overflight. As a result, the proposed project would not result in land uses that are incompatible with an adopted ALUCP.

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
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The PEIR determined that the proposed project would be consistent with and assist with implementation of the General Plan City of Villages strategy. It is possible that additional project areas may be able to take advantage of the Housing Program if future zoning changes permit development of multi-family residential uses in additional areas within TPAs. If TPA boundaries change or are expanded, additional project areas with residential or commercial zoning that currently permit multi-family residential uses could be allowed to use the proposed program benefits in exchange for providing affordable housing and neighborhood-serving infrastructure amenities. Furthermore, as future community plans are updated, additional land use changes would occur. As discussed herein, application of the Housing Program would be consistent with all City plans and regulations including the Coastal Act. Any future community plan and/or rezone would be required to be evaluated for consistency with applicable plans. Future development both within the project areas and development beyond the project areas would be required to demonstrate consistency with applicable regulations such as the ESL Regulations and airport land use compatibility policies and regulations. Any future development within the project areas that is identified to encroach into ESL would be subject to review in accordance with the ESL Regulations (LDC Section 143.0101 et seq.). Based on the compatibility of the proposed project with the General Plan policy framework and other applicable land use plans and regulations, cumulative land use compatibility impacts would be less than significant. Therefore, impacts would be less than significant.

Project

The basic function of the ALUCPs (Or compatibility Plans) are to promote compatibility between airports and the land uses surrounding them to the extent that these areas are not already devoted to incompatible uses. With limited exception, California law requires a compatibility plan for each public-use and military airport in the state. Most counties have established an airport land use commission (ALUC), as provided for by law, to prepare comparability plans for the airports that county and to review land use plans and development proposal, as well as certain airport development plans, for consistency with the comparability plans. In San Diego County, the ALUC function rests with the San Diego County Regional Airport Authority (SDCRAA), as provided in Section 21670.3 of the California Public Utilities Code.

Neither project site is within an ALUCP. No impacts would occur.

Project Cumulative

The Complete Communities PEIR determined that implementation of the Complete Communities program would not result in impacts associated with existing ALUCPs, because future development would continue to be limited by airport land use compatibility policies and regulations. Based upon the above analysis, the proposed project would not result in any cumulative land uses which are not compatible with an adopted airport land use compatibility plan.

6.2. AIR QUALITY: Would the project:

Issue 1: Conflict with or obstruct implementation of the applicable air quality plan?

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
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Complete Communities PEIR

The Complete Communities PEIR determined that the CCAA requires air basins that are designated nonattainment of the CAAQs for criteria pollutants prepare and implement plans to attain the standards by the earlier practicable dates. The two pollutants addressed in the San Diego SIP and RAQs are reactive organic gas (ROG) and oxides of nitrogen (NOx), which are precursors to the formation of ozone (O3). The SIP and the RAQS, which in conjunction with the TCMs were most recently i[dated in 2016, serve as the air quality plans of the SDAB.

The basis for the SIP and RAQS is the distribution of population in the region as projected by SANDAG. The SDAPCD refers to approved general plans to forecast, inventory, and allocate regional emissions from land use and development-related sources. These emissions budgets are used in statewide air quality attainment planning efforts. As such, projects that proposed development at an intensity equal to or less than the population growth projects and land use intensity described in their located land use plans are inherently consistent.

The Housing Program is intended to incentivize high-density multi-family residential development where affordable housing and community-serving amenities are provided within TPAs. The proposed Housing Program could result in a redistribution of the density that was evaluated within recent community plan update (CPU) Environmental Impact Reports (EIRs). Densities could shift to focus more within TPAs, but it is not anticipated to exceed overall CPU densities that were evaluated in the respective CPU EIRs. However, in project areas within communities that have not undergone a recent comprehensive4 CPR, it is possible that the proposed Housing Program could result in additional new development.

Recent CPU EIRs recognized that as the community plans were updated, newly designated land uses would be forwarded to SANDAG for inclusion in future updates to the air quality plans for the SDAB. The current SUP and RAQs were last updated in 2016 and are intended to be updated on a three-year cycle. Therefore, densities with community plans adopted after 2016 would be reflected in the current air quality plans. Additional density allowed with communities without a recent comprehensive CPU would also not be reflected in the air quality plans. Thus, the implementation of the Housing Program could result in a significant impact due to conflicts with the land use assumptions used to develop current RAQs and SIP.

Project

The Union and Newton project sites are located in the San Diego Air Basin (SDAB) and are under the jurisdiction of the San Diego Air Pollution Control District (SDAPCD) and the California Air Resources Board (CARB). Both the State of California and the Federal government have established health-based Ambient Air Quality Standards (AAQS) for the following six criteria pollutants: carbon monoxide (CO); ozone (O3); nitrogen oxides (NOx); sulfur oxides (SOx); particulate matter up to 10 microns in diameter (PM10); and lead (Pb). O3 (smog) is formed by a photochemical reaction between NOx and reactive organic compounds (ROCs). Thus, impacts from O3 are assessed by evaluating impacts from NOx and ROCs. A new increase in pollutant emissions determines the

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
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impact on regional air quality as a result of a proposed project. The results also allow the local government to determine whether a proposed project would deter the region from achieving the goal of reducing pollutants in accordance with the Air Quality Management Plan (AQMP) in order to comply with Federal and State AAQS.

The SDAPCD and San Diego Association of Governments (SANDAG) are responsible for developing and implementing the clean air plan for attainment and maintenance of the ambient air quality standards in the SDAB. The County Regional Air Quality Strategy (RAQS) was initially adopted in 1991, and is updated on a triennial basis (most recently in 2016). The RAQS outlines the SDAPCD's plans and control measures designed to attain the state air quality standards for ozone (O3). The RAQS relies on information from the CARB and SANDAG, including mobile and area source emissions, as well as information regarding projected growth in San Diego County and the cities in the county, to project future emissions and then determine the strategies necessary for the reduction of emissions through regulatory controls. CARB mobile source emission projections and SANDAG growth projections are based on population, vehicle trends, and land use plans developed by San Diego County and the cities in the county as part of the development of their general plans.

The RAQS relies on SANDAG growth projections based on population, vehicle trends, and land use plans developed by the cities and by the county as part of the development of their general plans. As such, projects that propose development that is consistent with the growth anticipated by local plans would be consistent with the RAQS. However, if a project proposes development that is greater than that anticipated in the local plan and SANDAG's growth projections, the project might be in conflict with the RAQS and may contribute to a potentially significant cumulative impact on air quality. The proposed project would not create a substantial increase in air pollutants. The proposed project would relocate an existing single-family home 4.5 miles south of its current location and provide exterior rehabilitation of the structure. The proposed project also would construct a 24-story residential tower with 73 dwelling units, a three-story, 33-foot-9-inch-tall mixed-use building containing 14 dwelling units, and 8,975 square foot of warehouse space. The project is consistent with the General Plan, Community Plan, and the underlying zone. Therefore, the project would be consistent at a sub-regional level with the underlying growth forecasts in the RAQS and would not obstruct implementation of the RAQS. No impact would result.

Project Cumulative

The proposed project would not result in cumulative air quality impacts. The project is consistent with the General Plan, Community Plan, and the underlying zone. Therefore, the project would be consistent at a sub-regional level with the underlying growth forecasts in the RAQS and would not obstruct implementation of the RAQS. No impact would result.

Issue 2: Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

Complete Communities PEIR

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
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In reviewing recent comprehensive CPU FEIR analysis related to operational emissions, generally, where CPUs would result in additional density beyond the prior plan, operational emission impacts were found to be significant and unavoidable. Where densities proposed were the same as or below the existing plan buildout densities, impacts were found to be less than significant.

For purposes of analyzing potential operational emissions, it is assumed that development under the Housing Program could exceed emissions levels compared to existing plans as the Housing Program could increase multi-family residential densities within the Housing Program project areas.

The primary source of operational emissions resulting from residential development is vehicle emissions. While the proposed project could increase multi-family residential densities within Housing Program project areas; the redistribution of density to focus within TPAs would provide a more efficient land use pattern that will support a reduction in vehicle miles traveled (VMT) and associated operational air emissions. Additionally, high density residential development generally would result in less area source emissions associated with fireplaces and landscape equipment.

However, the Complete Communities project spans multiple community planning areas, including areas without recently adopted community plans. As the Housing Program could increase operational emissions within communities without recently adopted CPUs and would redistribute density within communities with recently adopted CPUs, it is possible that operational air emissions could be in excess of what was evaluated in the community plan EIRs completed for all of the project areas.

Thus, at this programmatic level of review, and without project-specific development plans, operational emissions impacts resulting from development under the Housing Program would be significant.

Project

Short Term (Construction) Emissions

Project construction activities could potentially generate combustion emissions from on-site heavy-duty construction vehicles and motor vehicles transporting the construction crew, and necessary construction materials. Exhaust emissions generated by construction activities would generally result from the use of typical construction equipment that may include excavation equipment, forklift, skip loader, and/or dump truck. Variables that factor into the total construction emissions potentially generated include the level of activity, length of construction period, number of pieces and types of equipment in use, site characteristics, weather conditions, number of construction personnel, and the amount of materials to be transported on- or off-site. It is anticipated that construction equipment would be used on-site for four to eight hours per day; however, construction would be short-term (approximately five months from initiation of relocation efforts until the Jones House is fully relocated, settled, and restored) and impacts to neighboring uses would be minimal and temporary. Excavation, grading, and relocation activities can cause fugitive dust emissions. Construction of the project would be subject to standard measures required by a

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
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City of San Diego grading permit to reduce potential air quality impacts to less than significant. These measures include, but are not limited to, compliance with SDMC 142.0710, which prohibits airborne contaminants from emanating beyond the boundaries of the premises upon which the use emitting the contaminants is located. Some example measures are watering three times daily, reducing vehicle speeds to 15 miles per hour on unpaved or use architectural coatings that comply with San Diego Air Pollution Control District Rule 67.0 [i.e., architectural coatings that meet a volatile organic compounds (VOC) content of 100 grams per liter (g/l) for interior painting and 150 g/l for exterior painting] would be used during construction. Therefore, impacts associated with fugitive dust are considered less than significant and would not violate s air quality standard and would not contribute substantially to an existing or projected air quality violation. No mitigation measures are required.

Long-Term (Operational) Emissions

There would be no operational emissions associated with the proposed project. The project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation. No operational impacts would result.

Project Cumulative

The proposed project would not result in cumulative impacts for any criteria pollutant. The project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation. No operational impacts would result.

Issue 3: Expose sensitive receptors to substantial pollutant concentrations?

Complete Communities PEIR

The Complete Communities PEIR determined that the Housing Program would allow for increased height and square footage, and thus increased density, within TPAs for multi-family residential projects that meet all of the requirements of the ordinance, these projects could increase intersection volumes beyond what was evaluated in recent CPUs. While it is not reasonably foreseeable that the potential increase in intersection volumes could exceed the 31,600 vehicle-screening threshold based on the fact that projected volumes from the recent CPU EIRs have not exceeded the threshold, other communities, including communities within the project areas without a recent CPU, could have intersections with volumes approaching the screening threshold. As the Housing Program would allow for ministerial approval of multifamily residential developments, future projects would not be required to perform dispersion modeling to determine the potential for CO hot spots. It is possible that increased congestion within TPAs resulting from development under the Housing Program could increase volumes and delays at intersections, and could experience 31,600 vehicles per hour or more, resulting in a potentially significant impact related to localized CO hot spots.

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
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Project

As described above, construction operations could temporarily increase the emissions of dust and other pollutants. However, construction emissions would be temporary and short-term in duration; implementation of Best Management Practices (BMPs) would reduce potential impacts related to construction activities to a less than significant level. Based on the estimated operational emissions, the project would not exceed any screening-level criteria. Therefore, the project would not result in the exposure of sensitive receptors to substantial pollutant concentrations. Impacts would be less than significant.

Project Cumulative

The proposed project would not result in any cumulative impacts of exposing sensitive receptors substantial pollutant concentrations. Based on the estimated operational emissions, the project would not exceed any screening-level criteria. Therefore, the project would not result in the exposure of sensitive receptors to substantial pollutant concentrations. Impacts would be less than significant.

Issue 4: Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Complete Communities PEIR

The Complete Communities PEIR determined facilities that generate objectionable odors typically include wastewater treatments plants, landfills, and paint/coating operations (e.g., auto body shops), among others. The proposed project Housing Program would facilitate the development of high-density multi-family residential development, as well as associated infrastructure improvements. These uses are not expected to result in objectionable odors. Impacts would be less than significant.

Project

Short-term (Construction)

Odors would be generated from vehicles and/or equipment exhaust emissions during construction of the project. Odors produced during construction would be attributable to concentrations of unburned hydrocarbons from tailpipes of construction equipment and architectural coatings. Such odors are temporary and generally occur at magnitudes that would not affect a substantial number of people. Therefore, impacts would be less than significant.

Long-term (Operational)

Residential dwelling units, in the long-term operation, are not uses typically associated with the creation of such odors nor are they anticipated to generate odors affecting a substantial number or

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
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people. The Newton site does contain warehouse space but this type of use is not typically associated with the creation of odors. Therefore, project operations would result in less than significant impacts.

Project Cumulative

As discussed above the proposed project would not result in short- or long-term impacts related to odors. Therefore, there would be no cumulative impacts related to odors.

6.3. BIOLOGICAL RESOURCES – Would the project:

Issue 1: Result in a substantial adverse impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in the Multiple Species Conservation Program or other local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Complete Communities PEIR

The Complete Communities PEIR determined that proposed Housing Program is intended to facilitate and streamline multi-family development within the project areas by allowing such development to occur ministerially, subject to the requirements of the proposed ordinance and other applicable regulatory requirements. While the Housing Program would allow ministerial multi-family development within TPAs and incentivize housing within existing Mobility Zones 1, 2, and 32, some project areas may support sensitive species as shown in Figure 4.3-1, and summarized in Table 4.3-1. Of these sensitive habitats, approximately 605 acres are located within lands designated as ESL, including lands within the MHPA.

Future ministerial development within the project areas would be reviewed by City staff as part of the intake process to determine the presence of ESL, which would include sensitive habitats that may support sensitive species (LDM, Project Submittal Requirements, Section 1). If the presence of ESL is unclear, City staff would request evidence to confirm the presence or absence of ESL. If ESL is present and would be impacted by the proposed project, the project would no longer be processed ministerially and would be required to obtain a discretionary permit as detailed in SDMC Table 143-01A, Applicability of Environmentally Sensitive Lands Regulations. This process would ensure that potentially sensitive habitats would be reviewed in accordance with ESL Regulations, the City’s Biology Guidelines, and the provisions of the MSCP. Development under the Housing Program on sites with ESL that are processed with a Site Development Permit could result in significant impacts to sensitive species. While the discretionary review process would generally ensure impacts would be mitigated to less than significant, it cannot be ensured at this program level of review whether all impacts could be fully mitigated. Thus, impacts associated with potential future discretionary development under the Housing Program would be significant.

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
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Project

Both project sites are fully developed within an urbanized area. No native habitat is located on or adjacent to either site. As such, the proposed project would not directly or through habitat modification effect any species identified as a candidate, sensitive, or special statues species in local or regional plans, policies, or regulations, or by CDFW or USFW. Additionally, the project sites are located outside the City’s Multi-Habitat Preservation Area (MHPA). No impacts would occur.

Project Cumulative

The proposed project would not result in any cumulative impacts related to biological resources. Both project sites are fully developed within an urbanized area. No native habitat is located on or adjacent to either site. No impacts would occur.

Issue 2: Result in a substantial adverse impact on any Tier I Habitats, Tier II Habitats, Tier IIIA Habitats, or Tier IIIB Habitats as identified in the Biology Guidelines of the Land Development Manual or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Complete Communities PEIR

The Complete Communities PEIR determined that implementation of the project could impact sensitive habitats. Pursuant to the ESL Regulations, ministerial projects would be reviewed for the presence of ESL. If the development area is determined to support ESL, the project would not be processed ministerially and would instead be required to undergo a discretionary permit process in accordance with ESL Regulations, the City’s Biology Guidelines, and the provisions of the MSCP and VPHCP. Thus, with implementation of existing regulatory protections for biological resources, impacts to sensitive habitats resulting from future ministerial development within the project areas would be less than significant. However, at this program level of review, impacts associated with potential future discretionary development under the proposed project would be significant.

Project

Refer to Issue 6.3.1 above. The proposed project would not directly or indirectly impact any riparian habitat or other plant community.

Project Cumulative

The proposed project would not result in any cumulative impacts resulting in a substantial adverse impacts on Tier I Habitats, Tier II Habitats, Tier IIIA Habitats, or Tier IIIB Habitats as identified in the

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
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Biology Guidelines of the Land Development Manual or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service. The project would not directly or indirectly impact any riparian habitat or other plant community. Impacts would be less than significant.

Issue 3: Result in a substantial adverse effect on federally protected wetlands (including but not limited to marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Complete Communities PEIR

The Complete Communities PEIR determined that implementation of the proposed project would not likely impact wetlands, as areas where this habitat occurs would remain within open space and/or the MHPA. However, like other ESL, should wetland habitat be identified through project intake screening, it would not be processed ministerially, but would undergo a discretionary permit process in accordance with City and wildlife agency regulatory requirements. Thus, with implementation of existing regulatory protections for biological resources, impacts to wetlands resulting from future ministerial development within the project areas would be less than significant. However, where a discretionary review process is required consistent with the ESL Regulations, it cannot be ensured that all impacts can be fully mitigated at a program level of analysis. Impacts associated with potential future discretionary development under the proposed project would be significant.

Project

The project sites are fully developed and do not contain any Federally-protected wetlands as defined by Section 404 of the Clean Water Act. Also, please refer to response to Issue 6.3.1 above. No impact would occur.

Project Cumulative

The proposed project would not result cumulative impacts in a substantial adverse effect on federally protected wetlands (including but not limited to marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means. The project sites are fully developed and do not contain any Federally-protected wetlands as defined by Section 404 of the Clean Water Act. Also, please refer to response to Issue 6.3.1 above. No impact would occur.

Issue 4: Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
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Complete Communities PEIR

The Complete Communities PEIR determined that impacts to wildlife corridors and nursery sites would be avoided through compliance with the MSCP and compliance with protections afforded to MHPA and MHPA-adjacent lands. Thus, through adherence to the existing regulatory framework in place, potential impacts to wildlife corridor and nursery sites would be less than significant.

Project

No formal and/or informal wildlife corridors are located on or near the project sites, as the sites are located within a fully urbanized area. Also, refer to Issue 1, above. No impacts would result.

Project Cumulative

Based upon the above discussion, the proposed project would not have cumulative impacts to wildlife corridors and nursery sites.

Issue 5: Result in a conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan, either within the Multiple Species Conservation Program (MSCP) plan area or in the surrounding region?

Complete Communities PEIR

The Complete Communities PERI determined that project areas located within MHPA and VPHCP preserve lands would be subject to the ESL Regulations which would ensure no conflicts would occur in relation to the MSCP Subarea Plan or VPHCP. Additionally, development adjacent to MHPA and VPHCP preserve lands would be subject to the Land Use Adjacency Guidelines in MSCP Subarea Plan Section 1.4.3 and Avoidance and Minimization Measures VPHCP Section 5.2.1. Thus, impacts related to conflicts with the MSCP Subarea Plan and VPHCP would be less than significant.

Project

Refer to Issue one above. The proposed project is not located within the MHPA. The project would not conflict with the provisions of the MSCP. No impact would result.

Project Cumulative

Based upon the above discussion, the proposed project would not have cumulative to impacts resulting in a conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan,

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
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either within the Multiple Species Conservation Program (MSCP) plan are or in the surrounding region.

Issue 6: Result in a conflict with the provisions of an any local policies or ordinances protecting biological resources?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Complete Communities PEIR

The Complete Communities PEIR determined that the proposed project would be consistent with ESL Regulations. No conflicts with the MSCP Subarea Plan and/or VPHCP were identified. Impacts related to conflicts with local policies or ordinances protecting biological resources would be less than significant.

Project

Refer to Issue 1 above. The project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

Project Cumulative

Based upon the above analysis, the proposed project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. No cumulative impacts would occur.

6.4. ENERGY – Would the project:

Issue 1: Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Complete Communities PEIR

The Complete Communities PEIR determined that the long-term implementation of the proposed project would not create a land use pattern that would result in a wasteful, inefficient, or unnecessary use of energy. Impacts would be less than significant.

Project

The proposed project would be required to meet energy standards of the current California Energy Code (Title 24). In addition, the proposed project would be conditioned to meet building design measures per City code that incorporate energy conservation features (window treatments, efficient

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
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HVAC systems etc.). the project would also be required to implement CAP strategies which are energy reducing (cool roof, etc.). Less than significant impact.

Project Cumulative

Based upon the above analysis, the proposed project would not result in cumulative impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.

Issue 2: Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Complete Communities PEIR

The Complete Communities PEIR determined that future development implemented under the Housing Program, at a minimum, would be required to meet the mandatory energy requirements of CALGreen and the Energy Code (Title 24, Part 6 of the CCR) in effect at the time of development and would benefit from the efficiencies associated with these regulations as they relate to building heating, ventilating, and air conditioning mechanical systems, water heating systems, and lighting. Additionally, rebate and incentive programs that promote the installation and use of energy-efficient plug-in appliances and lighting would be available as incentives for future development. Adherence to mandatory energy requirements and regulations would help to meet targeted energy goals. Transportation infrastructure and improvements associated with implementation of the Mobility Choices Program would not conflict with any state or local plan for renewable energy or energy efficiency. Therefore, impacts would be less than significant.

Future projects resulting from implementation of the proposed project could contribute to cumulative impacts related to energy. However, all future development within the project areas would be subject to existing building and energy code regulations in place at the time of development. Other regulations that affect energy consumption described in Section 4.4.2 would continue to be implemented over time. As the Housing Program would support a more energy efficient land use pattern that promotes transit use, it would not contribute to a cumulative impact related to energy. Transportation infrastructure and amenities developed per the Mobility Choices Program would also not use excessive amounts of energy and would not contribute to a cumulative impact related to energy. Thus, cumulative impacts would be less than significant.

Project

The proposed project is consistent with the General Plan and Community Plan land use designations. Please refer to Energy, Issue 6.4.1 above.

Project Cumulative

The proposed project would not result in cumulative impacts relating to a conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
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6.5. GEOLOGY/SOILS/SEISMICITY – Would the project:

Issue 1: Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure, including liquefaction, or landslides?

Complete Communities PEIR

Implementation of the proposed project would not have direct or indirect significant environmental impacts in regard to seismic hazards because future development would be required to comply with the SDMC and CBC. This regulatory framework includes a requirement for site-specific geotechnical investigations to identify potential geologic hazards or concerns that would need to be addressed during grading and/or construction of a specific development project. Adherence to the SDMC grading regulations and construction requirements and implementation of recommendations contained within required site-specific geotechnical studies would preclude significant impacts related to seismic hazards. Thus, impacts would be less than significant.

Project

The proposed project sites could be affected by seismic activity as a result of earthquakes on major active faults located throughout the Southern California area. The project would utilize proper engineering design and utilization of standard construction practices, to be verified at the building permit stage, in order to ensure that potential impacts from regional geologic hazards would remain less than significant and mitigation is not required.

Project Cumulative

The proposed project would not result in any cumulative impacts that would expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure, including liquefaction, or landslides.

Issue 2: Result in substantial soil erosion or the loss of topsoil?

Complete Communities PEIR

Implementation of the proposed project would result in less than significant impacts related to erosion and loss of topsoil. SDMC regulations prohibit sediment and pollutants from leaving the worksite and require the property owner to implement and maintain temporary and permanent

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
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erosion, sedimentation, and water pollution control measures. Conformance to mandated City grading requirements would ensure that proposed grading and construction operations would avoid significant soil erosion impacts. Thus, impacts would be less than significant.

Project

The project includes a landscape plan for each location that has been reviewed and approved by City staff that precludes erosion of topsoil. In addition, standard construction BMPs necessary to comply with SDMC Grading Regulations (Chapter 14, Article 2, Division 1) would be in place to ensure that the project would not result in a substantial amount of topsoil erosion. Impacts would be less than significant.

Project Cumulative

Demolition and construction activities would temporarily expose soils to increase erosion potential. The project would be required to comply with the City's Storm Water Standards, which requires the implementation of appropriate best management practices (BMPs). Grading activities would be required to comply with the City of San Diego Grading Ordinance as well as the Storm Water Standards, which would ensure soil erosion and topsoil loss is minimized to less than significant levels. Furthermore, permanent storm water BMPs would also be required post-construction consistent with the City's regulations. Therefore, the project would not result in substantial soils erosion or loss of topsoil; therefore, impacts including cumulative would be less than significant.

Issue 3: Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Complete Communities PEIR

The Complete Communities PEIR determined that the implementation of the proposed project would not result in impacts related to landslides, lateral spreading, subsidence, liquefaction, or collapse. Future development within the project areas would be required to be constructed in accordance with the SDMC and CBC and would be required to prepare a site-specific geotechnical report and implement any recommendations within the report. Thus, impacts would be less than significant.

Project

Proper engineering design and utilization of standard construction practices would be verified at the construction permitting stage and would ensure that impacts in this category would not occur.

Project Cumulative

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
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Proper engineering design and utilization of standard construction practices would be verified at the construction permitting stage and would ensure that impacts in this category would not occur. The proposed project would not result in cumulative impacts in this issue area.

Issue 4: Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Complete Communities PEIR

The Complete Communities PEIR determined that the SDMC requires a geotechnical investigation prior to issuance of a building permit. If expansive soils are found at a particular project site within the project areas, the project would need to comply with both CBC and SDMC requirements. Compliance with existing regulations would ensure that impacts associated with expansive soils are reduced to less than significant.

Project

The proposed project is located on Olivenhain cobbly loam soil. This soil is not defined as expansive. No impacts would occur. Furthermore, proper engineering design and utilization of standard construction practices would be verified at the construction permitting stage and would ensure that impacts in this category would not occur.

Project Cumulative

The proposed project is not located on an expansive soil. Therefore, there are no cumulative impacts anticipated.

6.6. GREENHOUSE GAS EMISSIONS - Would the project:

Issue 1: Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Complete Communities PEIR

The Complete Communities PEIR determined that the proposed project would be consistent with the General Plan’s City of Villages strategy, and the City’s CAP by incentivizing the development of multi-family residential as well as other land uses to support the multi-family residential densities within TPAs and Mobility Zones 1, 2, and 32. The proposed project is intended to support the City in achieving CAP goals by supporting and incentivizing future development that will reduce GHG emissions, primarily through reductions in VMT. The proposed project would support the City in obtaining citywide GHG emissions reduction targets under the CAP. Impacts related to GHG emissions would be less than significant.

Project

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
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On July 12, 2016, the City of San Diego adopted the Climate Action Plan (CAP) Consistency Checklist, which requires all projects subject to discretionary review to demonstrate consistency with the Climate Action Plan.

The CAP is a plan for the reduction of GHG emissions in accordance with CEQA Guidelines Section 15183.5. Pursuant to CEQA Guidelines Sections 15604 (h) (3), 15130 (d), and 15183 (b), a project's incremental contribution to a cumulative GHG emissions effect may be determined not to be cumulatively considerable if it complies with the requirements of the CAP.

Projects that are consistent with the CAP as determined through the use of this Checklist may rely on the CAP for the cumulative impacts of GHG emissions.

The submitted Climate Action Plan (CAP) Consistency Checklist was reviewed by EAS staff and found to be acceptable. The CAP Consistency Checklist includes a three-step process to determine project the project would result in a GHG impact. Step 1 consists of an evaluation to determine the project's consistency with existing General Plan, Community Plan, and zoning designations for the site. Step 2 consists of an evaluation of the project's design features compliance with the CAP strategies. Step 3 is only applicable if a project is not consistent with the land use and/or zone, but is also in a transit priority area to allow for more intensive development than assumed in the CAP.

Under Step 1 of the CAP Consistency Checklist, the project is consistent with the existing General Plan and Downtown and Barrio Logan Community Plan land use designations and zoning for the site. Therefore, the project is consistent with the growth projections and land use assumptions used in the CAP. Furthermore, completion of Step 2 of the CAP Consistency Checklist demonstrates that the project would be consistent with applicable strategies and actions for reducing GHG emissions. This includes project features consistent with the energy and water efficient buildings strategy, as well as bicycling, walking, transit, and land use strategy. These project features would be assured as a condition of project Approval. Thus, the project is consistent with the CAP. Step 3 of the CAP Consistency Checklist would not be applicable, as the project is not proposing a land use amendment or a rezone.

Based on the project's consistency with the City's CAP Consistency Checklist, the project's contribution of GHGs to cumulative statewide emissions would be less than cumulatively considerable. Therefore, the project's direct and cumulative GHG emissions would have a less than significant impact on the environment.

Project Cumulative

Based on the project's consistency with the City's CAP Consistency Checklist, the project's contribution of GHGs to cumulative statewide emissions would be less than cumulatively considerable. Therefore, the project's direct and cumulative GHG emissions would have a less than significant impact on the environment.

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
Issue 2: Conflict with City's Climate Action Plan or another applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Complete Communities PEIR

The Complete Communities PEIR determined that future development under the proposed project would be consistent with state plans, SANDAG's San Diego Forward, the City's General Plan, and the City's CAP. Impacts associated with applicable GHG emission reduction plans would be less than significant.

Project

The project would not conflict with an applicable plan, policy, or regulation adopted for the purposes of reducing the emissions of GHGs. The project is consistent with the existing General Plan and Community Plan land use and zoning designations. Further based upon review and evaluation of the completed CAP Consistency Checklist for the project, the project is consistent with the applicable strategies and actions of the CAP. Therefore, the project would be consistent with the assumptions for relevant CAP strategies toward achieving the identified GHG reduction targets. Impacts would be less than significant.

Project Cumulative

Based on the project's consistency with the City's CAP Consistency Checklist, the project's contribution of GHGs to cumulative statewide emissions would be less than cumulatively considerable. Therefore, the project's direct and cumulative GHG emissions would have a less than significant impact on the environment.

6.7. HEALTH AND SAFETY – Would the project:

Issue 1: Create a significant hazard to the public or the environment through routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Complete Communities PEIR

The Complete Communities PER determined that although construction activities associated with the proposed project could involve the transport, use, or disposal of hazardous materials, compliance with applicable federal, state, and local regulations would ensure that regulated hazardous materials are handled and disposed of properly. Operation of future development could use small amounts of hazardous materials for cleaning and maintenance; however, hazardous materials and waste would be managed and used in accordance with all applicable federal, state,

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
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and local laws and regulations, which would ensure that no hazards would result during long-term operation of the project. Therefore, the project would not create a significant hazard to the public or environment. Impacts would be less than significant.

Project

The City's Thresholds states that significant impacts may occur if a project proposes the handling, storage and treatment of hazardous materials.

Construction activities for the project would involve the use of potentially hazardous materials including vehicle fuels, oils, transmission fluids, paint, adhesives, surface coatings and other finishing materials, cleaning solvents, and pesticides for landscaping purposes. However, the use of these hazardous materials would be temporary, and all potentially hazardous materials would be stored, used, and disposed of in accordance with manufacturers' specifications, applicable federal, state, and local health and safety regulations. As such, impacts associated with the transport, use, or disposal of hazardous materials would be less than significant during construction.

The operational phase of the project would occur after construction is completed. The project includes residential and commercial uses that are compatible with surrounding uses. These types of uses do not routinely transport, use, or dispose of hazardous materials, or present a reasonably foreseeable release of hazardous materials, with the potential exception of common commercial grade hazardous materials such as household and commercial cleaners, paint, etc. The project would not create a significant hazard through the routine transport, use, or disposal of hazardous materials, nor would a significant hazard to the public or to the environment through the reasonably foreseeable upset and accidental conditions involving the likely release of hazardous materials into the environment occur. Therefore, the proposed project would not create a significant hazard to the public or the environment and any impacts would be less than significant.

Project Cumulative

The proposed project would not have any cumulative impacts since the project does not propose the handling, storage and treatment of hazardous materials.

Issue 2: Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Complete Communities PEIR

The Complete Communities PEIR determined that project would not create a significant hazard to the public or environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Impacts would be less than significant.

Project

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
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Please refer to issue 6.7.1 above. Impacts would be less than significant.

Project Cumulative

Based upon the above discussion, the proposed project would not create a significant hazard to the public or the environment and any impacts would be less than significant.

Issue 3: Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Complete Communities PEIR

The Complete Communities PEIR determined project areas are located throughout the City and may be located within proximity to schools. The land uses that would be developed per the proposed project are not anticipated to result in hazardous emissions or exposure to acutely hazardous materials. In accordance with City, state, and federal requirements, any new development that involves contaminated property would necessitate the clean-up and/or remediation of the property in accordance with applicable requirements and regulations. No construction would be permitted to occur at a contaminated site until a “no further action” clearance letter from the County’s DEH, or a similar determination is issued by the SDFD, DTSC, RWQCB, or other responsible agency. Therefore, impacts to schools would be less than significant.

Project

As outlined in 6.7.1 and 6.7.2, the project would not store, transport, use of dispose of hazardous materials. Washington Elementary School is located within one-quarter mile of the Union site. No schools are located within one-quarter mile of the Newton site. Based on the described conditions no impacts related to emitting or handling hazardous materials waste or substances within one-quarter mile of a school site would occur. Impact would be less than significant.

Project Cumulative

The proposed project would not have any cumulative impacts since as outlined in 6.7.1 and 6.7.2, the project would not store, transport, use of dispose of hazardous materials. Cumulative impacts would not occur.

Issue 4: Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
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Complete Communities PEIR

The Complete Communities PEIR determined that implementation of the proposed project would be in accordance with City, county, state, and federal requirements, and any new development that involves contaminated property would necessitate the clean-up and/or remediation of the property in accordance with applicable requirements and regulations. No construction would be permitted at such locations until a “no further action” clearance letter from the County’s DEH, or a similar determination is issued by the SDFD, DTSC, RWQCB, or other responsible agency. Therefore, impacts related to hazardous materials sites and health hazards would be less than significant.

Project

A search of potential hazardous materials complied pursuant to Government Code Section 65962.5 was completed for both project sites. Based on the search conducted, neither project site is identified on a list of hazardous materials sites. As such, no impact would occur that would create a significant hazard to the public or environment.

Project Cumulative

A search of potential hazardous materials complied pursuant to Government Code Section 65962.5 was completed for both project sites. Based on the searched conducted, neither project site is identified on a list of hazardous materials sites. Project operations would be conducted in compliance with hazardous materials regulations, including the proper use, transport, and disposal of hazardous materials and preparation of a Hazardous Materials Business Plan (if warranted) for project operations. Compliance with hazardous materials regulations would ensure the project would not involve any changes that would increase the severity of a potential impact related to hazards and hazardous materials. Based on the above analysis and information the proposed project would no result in any cumulative impacts.

Issue 5: Result in a safety hazard for people residing or working within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport?

Complete Communities PEIR

The Complete Communities PEIR determined that the implementation of the proposed project would be consistent with adopted ALUCPs as future development would be required to show compatibility with the requirements of the ALUCPs, the SDMC, and associated FAA requirements. Impacts related to aircraft related hazards would be less than significant.

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
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Project

The project is not located within an airport land use plan, or within two miles of a public airport or public use airport. No impact would result.

Project Cumulative

As discussed above, the project is not located within an airport land use plan, or within two miles of a public airport or public use airport. Therefore, no cumulative impacts would result.

Issue 6: Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Complete Communities PEIR

The San Diego County Emergency Operations Plan (County of San Diego 2018) identifies a broad range of potential hazards and a response plan for public protection, and identifies major interstates and highways within San Diego County that could be used as primary routes for evacuation. Additionally, the County of San Diego MJHMP provides methods to help minimize damage caused by natural and man-made disasters. The City and the OES of San Diego County continue to coordinate to update the MJHMP as hazards, threats, population, and land use, or other factors change to ensure that impacts to emergency response plans are less than significant. Therefore, impacts related to emergency evacuation and response plans would be less than significant.

Project

The project would not impair the implementation of, or physically interfere with, an adopted emergency response plan or evacuation plan. No roadway improvements are proposed that would interfere with circulation or access, and all construction would take place on-site. No impacts would occur.

Project Cumulative

The project would not impair the implementation of, or physically interfere with, an adopted emergency response plan or evacuation plan. No roadway improvements are proposed that would interfere with circulation or access, and all construction would take place on-site. Based on the above analysis and information the proposed project would no result in any cumulative impacts.

6.8. HISTORICAL/ARCHAEOLOGICAL/TRIBAL CULTURAL RESOURCES - Would the project:

Issue1: Result in an alteration, including the adverse physical or aesthetic effects and/or destruction of a historic building (including architecturally

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
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significant building) structure, object, or site?

Complete Communities PEIR

The Complete Communities PEIR determined that all development projects with the potential to affect historical resources, such as designated historical resources, historical buildings, landscapes, objects, and structures; important archaeological sites, tribal cultural resources, and traditional cultural properties are subject to the City's Historical Resources Regulations and Historical Resources Guidelines. The City's Historical Resources Regulations (Chapter 14, Article 3, Division 2) include a number of requirements that would apply to future development evaluated under the proposed project that would ensure site specific surveys are completed to verify the presence of resources. Additionally, the Historical Resources Guidelines would be followed in the event site-specific surveys are required as part of the ministerial review process. Adherence to the Historical Resources Regulations and Guidelines would ensure that appropriate measures are applied to protection of historical resources consistent with City requirements. Such requirements may include archaeological and Native American monitoring, avoidance and preservation of resources, data recovery and repatriation or curation of artifacts, among other requirements detailed in the Historical Resources Guidelines.

Project

The purpose and intent of the Historical Resources Regulations of the Land Development Code (Chapter 14, Division 3, and Article 2) is to protect, preserve and, where damaged, restore the historical resources of San Diego. The regulations apply to all proposed development within the City of San Diego when historical resources are present on the premises. Before approving discretionary projects, CEQA requires the Lead Agency to identify and examine the significant adverse environmental effects which may result from that project. A project that may cause a substantial adverse change in the significance of a historical resource may have a significant effect on the environment (Sections 15064.5(b) and 21084.1). A substantial adverse change is defined as demolition, destruction, relocation, or alteration activities, which would impair historical significance (Sections 15064.5(b)(1)). Any historical resource listed in, or eligible to be listed in the California Register of Historical Resources, including archaeological resources, is considered to be historically or culturally significant.

The Andrew Cassidy Home, listed in the City of San Diego Register of Historical Resources (HRB #283). The property is not eligible for listing under National Register nor the California Register.

In addition to meeting one of the local, State, or Federal criteria, a property must also retain a significant amount of its historic integrity to be considered eligible for listing. Historic integrity is made up of seven aspects: location, design, setting, materials, workmanship, feeling, and association. The following is an integrity analysis of the Andrew Cassidy Home.

The Andrew Cassidy Home is located on a rectangular lot, approximately 50' by 100', at 1620 Union Street. The building is wood framed and set on a cast-in-place concrete foundation stem wall. A

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
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crawlspace access hatch is located on the west façade located underneath the non-historic wood accessibility ramp. The foundation wall is mostly covered with non-historic horizontal wood siding. The exterior walls consist of horizontal wood clapboard siding with a painted finish. There are vertical wood trim corner boards at the corners of each façade. A decorative wood base trim runs the perimeter of the building. Below the wood base trim is the non-historic wood siding over concrete stem wall.

The house located at 1620 Union Street appears to be in good condition and retains a good level of its historic integrity. Modifications appear to comply with The Secretary of the Interior’s Standards for the Treatment of Historic Properties and include a replacement roof, replacement front porch and railing, an addition at the rear not visible from the public right-of-way, and replacement windows.

The proposed project would result in a significant direct impact to the historical resource, the Andrew Cassidy Home, because of its relocation. Mitigation measures would reduce impacts to the historical resource to less than significant since the new location is situated within a similar residential block in the Barrio Logan community that is compatible with the original character and use of the Andrew Cassidy Home and will reintroduce the house to a residential neighborhood made-up of similar houses from the same period. Adherence to The Secretary of the Interior’s Standards for the Treatment of Historic Properties will be conducted on the relocated resource which will enable the building to continue to convey its architecture, retaining a high degree of its integrity of setting, design, workmanship, materials, feeling, and association, for which the property received its designation.

Many areas of San Diego County, including mesas and the coast, are known for intense and diverse prehistoric occupation and important archaeological and historical resources. The region has been inhabited by various cultural groups spanning 10,000 years or more. The project area is located within an area identified as sensitive on the City of San Diego Historical Resources Sensitivity Maps. Qualified City staff conducted a records search of the California Historic Resources Information System (CHRIS) digital database; the search identified several previously recorded historic and prehistoric sites in the project vicinity. Based on this information, there is a potential for buried cultural resources to be impacted through implementation of the project.

Therefore, a Mitigation Monitoring Reporting Program, as detailed within Section V of the MND, would be implemented. With implementation of the historical resources monitoring program, potential impacts on historical resources would be reduced to below a level of significance.

Project Cumulative

The proposed project would result in a significant direct impact to the historical resource, the Andrew Cassidy Home, because of its relocation. No other known projects with impacts to historic resources are within the vicinity, however. Mitigation measures are included to reduce impacts to less than significant. Based upon the above analysis, no cumulative impacts would occur.

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
Issue 2: Result in a substantial adverse change in the significance of a prehistoric or historic archaeological resource, a religious or sacred site, or the disturbance of any human remains those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Complete Communities PEIR

The Complete Communities PEIR that while existing regulations and the LDC would provide for the regulation and protection of archaeological resources and human remains, it is impossible to ensure the successful preservation of all archaeological resources. Therefore, potential impacts to archaeological resources and human remains are considered significant.

Project

There are no formal cemeteries or known burials in the immediate vicinity of the project site. In the unlikely event of a discovery of human remains, the project would be handled in accordance with procedures of the California Public Resources Code (§5097.98), State Health and Safety Code (§7050.5), and California Government Code Section 27491. These regulations detail specific procedures to follow in the event of a discovery of human remains, i.e. work would be required to halt and no soil would be exported off-site until a determination could be made via the County Coroner and other authorities as required. In addition, to reduce potential archaeological resource impacts to below a level of significance, all excavation within previously undisturbed soil would be monitored by a qualified archaeologist or archaeological monitor and Native American monitor. This monitoring would ensure that any remains are identified and handled in compliance with these regulations. As no known burials exist within the project site, it is not anticipated that human remains would be encountered during construction. Therefore, no impact would occur.

Project Cumulative

As no known burials exist within the project site, it is not anticipated that human remains would be encountered during construction.

Issue 3: Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

- a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k); or,

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
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Complete Communities PEIR

The Complete Communities PEIR determined that while existing regulations including the San Diego Historical Resources Regulations and Historical Resources Guidelines would provide for the protection of tribal cultural resources and would minimize potential impacts, it is not possible to ensure the successful preservation of all tribal cultural resources. Therefore, potential impacts to tribal cultural resources are considered significant.

Project

The project proposes the relocation and rehabilitation of the Andrew Cassidy House, which has been determined to be historic, within a built-out neighborhood of the City of San Diego. There are no tribal cultural structures on either the donor or receiving sites, and no impacts to tribal historic resources would occur. No tribal cultural resources are located on the project site that meet the criteria for listing on the local, State, or Federal registers as defined in PRC Section 5020.1(k). No impact would result.

Project Cumulative

Based on the above analysis and information the proposed project would no result in any cumulative impacts.

- b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Complete Communities PEIR

The Complete Communities PEIR determined that while existing regulations including the San Diego Historical Resources Regulations and Historical Resources Guidelines would provide for the protection of tribal cultural resources and would minimize potential impacts, it is not possible to ensure the successful preservation of all tribal cultural resources. Therefore, potential impacts to tribal cultural resources are considered significant.

Project

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
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Tribal Cultural Resources include sites, features, places, cultural landscapes, and sacred places or objects that have cultural value or significance to a Native American Tribe. Tribal Cultural Resources include “non-unique archaeological resources” that, instead of being important for “scientific” value as a resource, can also be significant because of the sacred and/or cultural tribal value of the resource. The City, as lead agency, determined that Tribal Cultural Resources pursuant to subdivision Public Resources Code Section 5024.1(c) would not have the potential to be impacted through project implementation. No impact would occur.

Project Cumulative

Based on the above analysis and information the proposed project would no result in any cumulative impacts.

6.9. HYDROLOGY/WATER QUALITY - Would the project:

Issue 1: Result in flooding due to an increase in impervious surfaces or changes in absorption rates, drainage patterns, or the rate of surface runoff?

Complete Communities PEIR

All development occurring within the project areas would be subject to drainage and floodplain regulations in the SDMC, and would be required to adhere to the City’s Drainage Design Manual, ESL Regulations protecting floodplains, Federal Emergency Management Agency (FEMA) standards, and the City’s Storm Water Standards Manual. Thus, impacts related to changes in runoff patterns associated with future development would be less than significant.

Potential riverine flooding impacts would largely be avoided through compliance with ESL regulations; however, at a program level of analysis it cannot be ensured that every future project would fully mitigate potential flooding impacts, resulting in a significant and unavoidable impact. Additionally, for project areas protected by the provisionally accredited levy in Mission Valley, impacts would be significant.

Impacts associated with flooding due to a seiche or dam inundation would be less than significant, due to the lack of seiche hazards within the project areas, and based on applicable regulatory requirements and protections associated with development downstream of dams.

Impacts related to tsunami inundation would be significant and unavoidable due to the potential for increased development densities occurring within areas subject to tsunami inundation. Future development is anticipated to incorporate adequate design measures to protect development areas from potential mudflow and debris that could follow a fire event; however, areas with potential risk

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
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of mudflow cannot be determined at this programmatic level of review and impacts would be significant.

Project

The project would comply with the City’s Stormwater Management and Discharge Control Ordinance (Municipal Code Chapter 4, Article 3, Division 3), Storm Water Runoff and Drainage Regulations (LDC Section 142.02 et al.), and other applicable storm water quality standards during and after construction. Treatment control best management practices (BMPs) have been selected that would ensure pollutants are not discharged to receiving waters. The project would employ site design, source control and structural BMPs. Site design BMPs include minimizing impervious areas, minimizing soil compaction, dispersing the impervious areas, collecting runoff in biofiltration basins, and use of native or drought-tolerant species for landscaping purposes. Source control BMPs include the placement of trash and storage areas in unit garages to prevent dispersion by rain, run-on, run-off, and wind. These requirements have been reviewed by qualified City staff and would be re-verified during the ministerial building permit process. Adherence to applicable water quality standards would ensure adverse impacts associated with compliance with quality standards and waste discharge requirements are avoided. Impacts would be less than significant.

Project Cumulative

Adherence to applicable water quality standards would ensure adverse impacts associated with compliance with quality standards and waste discharge requirements are avoided. Impacts would be less than significant. Based on the above analysis and information the proposed project would not result in any cumulative impacts.

Issue 2: Result in a substantial increase in pollutant discharge to receiving waters and increase of identified pollutants to an already impaired water body?

Complete Communities PEIR

The Complete Communities PEIR determined that new development occurring within the project areas would be required to implement Low Impact Development (LID) and storm water BMPs into the design of future projects within the project areas to address the potential for transport of pollutants of concern through either retention or filtration, consistent with the requirements of the Municipal Separate Storm Sewer System (MS4) Permit for the San Diego region and the City’s Storm Water Standards Manual. Implementation of LID design and storm water BMPs would reduce the amount of pollutants transported from the project areas to receiving waters. Thus, with compliance with the existing regulatory framework addressing protection of water quality, impacts would be less than significant.

Project

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
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The project would implement low impact development principles ensuring that a substantial increase in the rate or amount of surface runoff resulting in flooding on or off-site, or a substantial alteration to the existing drainage pattern would not occur. Streams or rivers do not occur on or adjacent to the project site. Impacts would be less than significant, and no mitigation measures are required.

Project Cumulative

Adherence to applicable water quality standards would ensure adverse impacts associated with compliance with quality standards and waste discharge requirements are avoided. Impacts would be less than significant. Based on the above analysis and information the proposed project would not result in any cumulative impacts.

Issue 3: Deplete groundwater supplies, degrade groundwater quality, or interfere with groundwater recharge?

Complete Communities PEIR

The Complete Communities PEIR determined that storm water regulations that encourage infiltration of storm water runoff and protection of water quality would protect the quality of groundwater resources and support infiltration where appropriate. Impacts would be less than significant.

Project

The project does not require the construction of wells or the use of groundwater and therefore, the project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge. The project is located in an urban neighborhood where all infrastructures exist. The project would connect to the existing public water system. No impact would result.

Project Cumulative

As discussed above, the proposed project does not require the construction of wells or groundwater. Based upon the above analysis, the proposed project would not result in cumulative impacts.

6.10. NOISE - Would the project:

Issue 1: Result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
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in the local general plan or noise ordinance, or applicable standards of other agencies?

Complete Communities PEIR

The Complete Communities PEIR determined:

General Ambient Noise Levels

Ambient noise levels in the project areas would increase as a result of implementation of the proposed project. The increase in ambient noise levels associated with additional potential density within the project areas could expose existing and future noise-sensitive receptors to a significant noise impact. The Housing Program includes design requirements to attenuate noise levels in outdoor usable open space areas through project design. While compliance with the design requirements would reduce potential impacts to existing and future noise sensitive land uses, future ambient noise levels could nevertheless exceed the City's significance threshold. Therefore, impacts would be significant.

Traffic-related Noise Levels

Interior noise standards of 45 A-weighted decibels Community Noise Equivalent Level [dB(A) CNEL] for residential uses and 50 dB(A) for nonresidential uses will be achieved through compliance with Title 24 requirements during the building permit review. However, future development within the project areas could result in the exposure of residents to exterior noise levels which exceed the City's significance thresholds. Recent Community Plan Update EIR analysis shows noise levels in the project areas are dominated by vehicle traffic exceeding allowable levels. While design requirements associated with the proposed ordinance would reduce potential impacts to existing and future noise sensitive land uses, future ambient noise levels could nevertheless exceed the City's significance threshold. Therefore, impacts would be significant.

Rail Noise City

Rail and trolley lines pass through the project areas. New development located adjacent to rail operations could expose residents to noise levels that exceed noise standards. Therefore, at this programmatic level of review, impacts associated with rail noise would be significant.

Noise Ordinance Compliance

The project areas would contain residential and commercial interfaces. Mixed-use areas where residential uses are located in proximity to commercial sites could expose sensitive receptors to noise above allowable levels. While it is not anticipated that stationary sources associated with multi-family residential land uses located within TPAs would result in noise exceeding property line limits, at a programmatic level of review it cannot be verified. The City's Noise Ordinance property line standards would apply to any future development processed under the proposed ordinances.

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
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Although enforcement mechanisms for the violation of noise regulations in the Noise Abatement and Control Ordinance would provide for the correction of potential noise exceedances, impacts could remain potentially significant.

Temporary Construction Noise Levels

Construction activities related to implementation of the proposed project would potentially generate short-term noise levels in excess of 75 dB(A) hourly equivalent sound level (Leq) at adjacent properties. While the City regulates noise associated with construction equipment and activities through enforcement of its noise ordinance standards (e.g., days of the week and hours of operation), impacts associated with construction noise would be remain potentially significant.

Project

Short-term noise impacts would occur from the demolition, grading and construction activities from the project. Construction-related short-term noise levels would be higher than existing ambient noise levels in the project area but would no longer occur once construction is completed. Sensitive receptors (e.g. residential uses) occur in the immediate area and may be temporarily affected by construction noise; however, construction activities would be required to comply with the construction hours specified in City’s Municipal Code, (Section 59.5.0404, Construction Noise), which are intended to reduce potential adverse effects resulting from construction noise. With compliance to the City’s construction noise requirements, project construction noise levels would be reduced to less than significant, and no mitigation measures are required.

For the long-term, typical noise levels associated with the existing residential uses are anticipated, and the project would not increase in the existing ambient noise level. The project would not result in noise levels in excess of the standards established in the City of San Diego General Plan or Noise Ordinance. No significant long-term impacts would occur, and no mitigation measures are required.

Project Cumulative

As discussed above, the proposed project would not result in any short term or long term noise impacts. Based upon the above analysis, there would no cumulative impacts.

Issue 2: Cause the generation of, excessive groundborne vibration or groundborne noise levels?

Complete Communities PEIR

The Complete Communities PEIR determined that groundborne vibration impacts could occur as a result of trolley and train operations where development is located in proximity to a rail line. The specific location and orientation of future development is unknown at this time. Due to the anticipated proximity of future multi-family residential development near rail lines, impacts would be significant.

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
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Project

Pile driving activities that would potentially result in ground borne vibration or ground borne noise are not anticipated with construction of the project. Potential effects from construction noise would be reduced to below a level of significance through compliance with Section 59.5.0404 of the City's Municipal Code. Therefore, the project would not expose people to excessive generation of ground borne vibration or noise levels. Impacts would be less than significant.

Project Cumulative

As discussed above, the project would not expose people to excessive generation of ground borne vibration or noise levels. Cumulative impacts would be less than significant.

Issue 3: Be located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Complete Communities PEIR

The Complete Communities PEIR determined that portions of the project areas are located within ALUCP identified noise contours. However, the proposed project does not propose a change to any existing land use designation and future multi-family residential development allowed under the proposed ordinance would be consistent with existing Community Plan allowed land uses and associated ALUC consistency determinations. However, During the building permit process for proposed projects, overflight notification requirements would apply. Therefore, impacts would be less than significant.

Project

Neither project site is located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport thereby exposing people residing or working in the project area to excessive noise levels. The San Diego International Airport (SDIA) is located 2.9 miles to the west of the Union project site and the Newton project site is 5.3 miles to the southeast of SDIA. Therefore, no impacts would occur.

Project Cumulative

As discussed above, the proposed project is not within the vicinity of a private airstrip or within an airport land use plan. The proposed project would not expose people residing or working in the project area to excessive noise levels. No cumulative impacts would occur.

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
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6.11. PALEONTOLOGICAL RESOURCES - Would the project:

Issue 1: Result in development that requires over 1,000 cubic yards of excavation in a high resources potential geologic deposit/formation/rock unit or over 2,000 cubic yards of excavation in a high resources potential geologic deposit/formation/rock unit

Complete Communities PEIR

The Complete Communities PEIR determined that implementation of the General Grading Guidelines for Paleontological Resources, as required by the SDMC and applicable to all new development, would require paleontological monitoring to ensure that potential paleontological resources impacts resulting from future grading activities would be less than significant.

Project

Both proposed project sites are located in an area with the high sensitivity for paleontological resources. The CEQA significant threshold for high sensitivity areas is grading of 1000 cubic yards to a depth of 10 feet. The proposed project would grade 2,931 cubic yards to a depth of 17 feet at the Union project site and 438 cubic yards to a depth of 3 feet at the Newton site. Based upon the amount of grading proposed paleontological monitoring will be required. This monitoring would become a condition of the permit.

Project Cumulative

Based upon the proposed project locations, the project could potentially impact paleontological resources. Paleontological monitoring is required as a condition of the permit. This regulatory compliance will reduce potential impacts to below a level of significance. Any future projects in the vicinity would also have to comply with these regulations. Based upon the above analysis, the proposed project would not any cumulative impacts.

6.12. PUBLIC SERVICES AND FACILITIES – Would the project:

Issue 1: Promote growth patterns resulting in the need for and/or provision of new or physically altered public facilities (including police, fire-rescue, schools, libraries, parks, or other recreational facilities), the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
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Complete Communities PEIR

Implementation of the Complete Communities project could result in the need for additional police, fire-rescue, school, library, and parks and recreation facilities. Additionally, transportation infrastructure and amenities constructed under the Mobility Choices program could result in environmental impacts. As the location and need for potential future facilities cannot be determined at this time, it is unknown what specific impacts may occur associated with the future construction and operation of such facilities. Thus, as it cannot be ensured all impacts associated with the construction and operation of potential future facilities would be mitigated to less than significant, impacts would be significant and unavoidable.

Project

Both project sites are located in an urbanized area where fire protection services are provided. The sites would continue to be served by the City. The project would not adversely affect existing levels of fire protection services to the area and would not require the construction of new or expanded governmental facilities. The project sites are located in an urbanized area where police protection services are provided. The sites would continue to be served by the City. The project would not adversely affect existing levels of police protection services to the area and would not require the construction of new or expanded governmental facilities. The project would not affect existing levels of public services and would not require the construction or expansion of a school facility. The project sites are located in an urbanized and developed area where public school services are available. The project would not significantly increase the demand on public schools over that which currently exists and is not anticipated to result in a significant increase in demand for public educational services. The project sites are located in an urbanized and developed area where City-operated parks are available. The project would not significantly increase the demand on existing neighborhood or regional parks or other recreational facilities over that which presently exists and is not anticipated to result in a significant increase in demand for parks or other offsite recreational facilities. The project sites are located in an urbanized and developed area where City services are already available. The project would not adversely affect existing levels of other public facilities and not require the construction or expansion of an existing governmental facility.

Project Cumulative

As discussed above, the proposed project would not adversely affect existing levels of other public facilities and not require the construction or expansion of an existing governmental facility. Impacts would be less than significant, including therefore cumulative impacts.

Issue 2: Increase the use of existing neighborhood and regional recreational facilities such that substantial deterioration of the facility would occur or be accelerated?

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
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Complete Communities PEIR

The Complete Communities PEIR determined that implementation of the proposed project could result in an increase in the use of existing neighborhood and regional parks or other recreational facilities. While the development of these future recreational amenities under the Housing Program could offset the potential increased use of existing recreational facilities, it is unknown where these future improvements will be located, what impacts could result from providing these facilities, and to what extent these future facilities will be able to accommodate increases in demand for recreational facilities. Thus, as it cannot be ensured that all impacts would be mitigated to a less than significant level, impacts would be significant and unavoidable.

Project

The project does not propose recreation facilities nor require the construction or expansion of any such facilities. Impacts would be less than significant.

Project Cumulative

As discussed above, the project does not propose recreation facilities nor require the construction or expansion of any such facilities. Impacts would be less than significant including cumulative.

Issue 3: Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Complete Communities PEIR

The Complete Communities PEIR determined that implementation of the proposed project could result in an increase in the use of existing neighborhood and regional parks or other recreational facilities. While the development of future recreational amenities under the proposed Housing Program could offset the potential increased use of existing recreational facilities, it is unknown where these future improvements will be located, what impacts could result from providing these facilities, and to what extent these future facilities will be able to accommodate increases in demand for recreational facilities. Thus, as it cannot be ensured that all impacts would be mitigated to a less than significant level, impacts would be significant and unavoidable.

Project

Both project sites are located in urbanized and developed areas where City-operated parks are available. The project would not significantly increase the demand on existing neighborhood or regional parks or other recreational facilities over that which presently exists and is not anticipated

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
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to result in a significant increase in demand for parks or other offsite recreational facilities. Impacts would be less than significant.

Project Cumulative

As discussed above the project would not significantly increase the demand on existing neighborhood or regional parks or other recreational facilities over that which presently exists and is not anticipated to result in a significant increase in demand for parks or other offsite recreational facilities. Impacts would be less than significant including cumulative.

6.13. PUBLIC UTILITIES AND INFRASTRUCTURE – Would the project:

Issue 1: Use excessive amounts of water beyond projected available supplies?

Complete Communities PEIR

The Complete Communities PEIR determined that according to Water Supply Assessments prepared for recent CPUs, water demand would not increase within project areas located in communities with a recent CPU. Within project areas that do not have a recent comprehensive CPU, it is possible that densities could be authorized in excess of what would have been considered in the latest water supply planning document. Thus, at this programmatic level of review, direct and cumulative impacts related to the availability of water supplies based on existing projections would be significant.

Project

The project does not meet the City's CEQA significance thresholds requiring the need for the project to prepare a water supply assessment. A water supply assessment is required for the following types of projects:

- a. Residential developments of more than 500 units;
- b. Shopping centers or businesses employing more than 1,000 people or having more than 500,000 square feet of floor space;
- c. Commercial office buildings employing more than 1,000 people or having more than 250,000 square feet of floor space;
- d. Hotels or motels having more than 500 rooms; e. Industrial, manufacturing, or processing plants or industrial parks planned to house more than 1,000 people or having more than 650,000 square feet of floor space;
- f. Mixed use projects that include one or more of the above types of projects;
- g. Projects that would demand an amount of water equivalent to, or greater than, the amount of water required by a 500 dwelling unit project.

The proposed project is the development of a total of 81 dwelling and 7,949 square-feet of warehouse space. This does not rise to the level of significance listed above.

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
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The existing project sites currently receives water service from the City, and adequate services are available to serve the site without requiring new or expanded entitlements. No impact would result.

Project Cumulative

As discussed above, the project does not meet the CEQA significance thresholds requiring the need for the project to prepare a water supply assessment. Based upon the above analysis, the proposed project would not result in impacts including cumulative.

Issue 2: Promote growth patterns resulting in the need for and/or provision of new or physically altered utilities, the construction of which could cause significant environmental impacts in order to maintain service ratios, or other performance objectives?

Complete Communities PEIR

The Complete Communities determined that mandatory compliance with City standards for the design, construction, and operation of storm water, water distribution, wastewater, and communications systems infrastructure would likely minimize significant environmental impacts associated with the future construction of and/or improvements to utility infrastructure. However, at this programmatic level of review and without the benefit of project specific development plans, both direct and cumulative impacts associated with the construction of storm water, water distribution, wastewater, and communication systems would be significant.

Project

The project is not anticipated to generate significant amounts of wastewater or stormwater. The project would not result in a significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources. Wastewater facilities used by the project would be operated in accordance with the applicable wastewater treatment requirements of the Regional Water Quality Control Board (RWQCB). Existing sewer infrastructure exists within roadways surrounding the project site and adequate services are available to serve the project. Thus, impacts would be less than significant

Project Cumulative

As discussed above, the proposed project is not anticipated to generate significant amounts of wastewater or stormwater. Based upon the above analysis, impacts would be less than significance including cumulative.

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
Issue 3: Result in impacts to solid waste management, including the need for construction of new solid waste infrastructure including organics management, materials recovery facilities, and/or landfills; or result in development that would not promote the achievement of a 75 percent target for waste diversion and recycling as required under AB 341 and the City's Climate Action Plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Complete Communities PEIR

The Complete Communities PEIR determined that future development within the project areas would generate solid waste through demolition/construction and ongoing operations, which would increase the amount of solid waste generated within the region. However, future projects would be required to comply with City regulations regarding solid waste that are intended to divert solid waste from the Miramar Landfill to preserve capacity. Compliance with existing regulations requiring waste diversion would help preserve solid waste capacity. Therefore, impacts associated with solid waste would be less than significant.

Project

Adequate services are available to serve the site and the project would not require the construction or expansion of existing facilities. The project would be served by a landfill with sufficient permitted capacity to accommodate the project's disposal needs. Construction debris and waste would be generated from the construction of the new residential and commercial units. All construction waste from the project site would be transported to an appropriate facility, which would have adequate capacity to accept the limited amount of waste that would be generated by the project. Long-term operation of the project would be anticipated to generate typical amounts of solid waste associated with residential and commercial use. Furthermore, the project would be required to comply with the City's Municipal Code (including the Refuse and Recyclable Materials Storage Regulations (Municipal Code Chapter 14, Article 2, Division 8), Recycling Ordinance (Municipal Code Chapter 6, Article 6, Division 7), and the Construction and Demolition (C&D) Debris Deposit Ordinance (Municipal Code Chapter 6, Article 6, Division 6)) for diversion of both construction waste during the demolition phase and solid waste during the long-term, operational phase. Impacts would be less than significant.

Project Cumulative

As discussed above, adequate services are available to serve the site and the project would not require the construction or expansion of existing facilities. Based upon the above analysis, impacts including cumulative would be less than significant.

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
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6.14. TRANSPORTATION – Would the project:

Issue 1: Conflict with an adopted program, plan, ordinance, or policy addressing the transportation system, including transit, roadways, bicycle, and pedestrian facilities?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Complete Communities PEIR

Overall, the proposed project would support improved pedestrian, bicycle and transit facilities and foster increased safety for all alternative modes by facilitating the development of high density multi-family residential land uses close to existing transit areas. Additionally, the Mobility Choices Program would further support multi-modal opportunities within Mobility Zones 1, 2, and 32 consistent with City policies. Thus, impacts related to conflicts with adopted policies, plans, or programs supporting transportation would be less than significant. SB 743 requires the Governor’s OPR to identify new metrics for identifying and mitigating transportation impacts within CEQA. Consistent with the intent of SB 743, the City’s new CEQA significance threshold are required to be adopted by July 1, 2020.

Project

The project would not change existing circulation patterns on area roadways. The project would not conflict with any applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system. Therefore, no impact would occur.

Project Cumulative

As discussed above, the project would not change existing circulation patterns on area roadways. The project would not conflict with any applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system. Therefore, no impact would occur including cumulative.

Issue 2: Be located within an area on the SANDAG VMT screening maps estimated to generate resident VMT per capita greater than 85 percent of the base year regional average? For mixed-use projects with a commercial component, would the project be located within an area on SANDAG VMT screening maps estimated to generate resident VMT per capita and/or employee VMT per employee greater than 85 percent of the base year regional average?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Complete Communities PEIR

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
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The Complete Communities PEIR determined that while VMT related impacts in the majority of the Housing Program project areas would result in less than significant impacts where development is located in VMT efficient areas (at or below 85 percent of the regional average), impacts in less efficient VMT per capita areas (greater than 85 percent of the regional average) would remain significant and unavoidable. Although development under the Housing Program combined with improvements resulting from the Mobility Choices Program are anticipated to result in the implementation of infrastructure improvements that could result in reductions in per capita VMT, at a program level, it cannot be determined whether those improvements would sufficiently reduce potentially significant VMT impacts to below the threshold of significance. The Mobility Choices Program would provide for additional transportation infrastructure and amenities that would support reductions in per capita VMT. Implementation of such infrastructure and amenities would not be associated with significant VMT related impacts, and impacts would be less than significant. Although the Mobility Choices Program is anticipated to result in the implementation of infrastructure improvements that could result in per capita VMT reductions, at a program level, potentially significant VMT impacts could nonetheless remain significant because it cannot be determined with certainty whether the improvements would be implemented at the time a future development project's VMT impacts could occur and whether those impacts would be mitigated to a less than significant level. VMT impacts associated with development under the Housing Program located in less efficient VMT areas would be significant and unavoidable.

Project

The proposed project locations are in two separate census tracks, 4.5 miles apart. The Union Street portion of the project is presumed to have a less than significant Vehicle Miles Traveled (VMT) impact due to its estimated trip generation of 292 ADT, which is under the 300 ADT trip generation screening criteria for Small Projects per the City of San Diego Transportation Study Manual (9/29/20). The Newton Ave portion of the project is presumed to have a less than significant VMT impact due to its estimated trip generation of 113 ADT, which is also under the 300 ADT trip generation screening criteria for Small Projects per the City of San Diego Transportation Study Manual (9/29/20). Therefore, impacts would be less than significant.

Project Cumulative

The proposed project locations are in two separate census tracks, 4.5 miles apart. As discussed above the Union Street portion of the project is presumed to have a less than significant Vehicle Miles Traveled (VMT) impact due to its estimated trip generation of 292 ADT, which is under the 300 ADT trip generation screening criteria for Small Projects per the City of San Diego Transportation Study Manual (9/29/20). The Newton Ave portion of the project is presumed to have a less than significant VMT impact due to its estimated trip generation of 113 ADT, which is under the 300 ADT trip generation screening criteria for Small Projects per the City of San Diego Transportation Study Manual (9/29/20). Therefore, impacts would be less than significant including cumulative.

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
Issue 3: Substantially increase hazards due to a geometric design features (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Complete Communities PEIR

The Complete Communities PEIR determined that any proposed improvements to roadways or amenities such as bicycle facilities would undergo review and approval by the City Engineer. Adherence to City standards, including the City’s Street Design Manual, would ensure that a substantial increase in hazards or incompatible uses would not occur as a result of the proposed project. The proposed project does not include any requirements that would result in a substantial increase in hazards due to design features or incompatible uses. Impacts would be less than significant.

Project

The Project consists of a Site Development Permit (SDP) for the relocation of a designated historical resource, the Andrew Cassidy Home (Historical Resources Board No. 283), from 1620 Union Street in the Downtown Community Plan area (Council District 3) to 2642-2648 Newton Avenue in the Barrio Logan Community Plan area (Council District 8) and a Coastal Development Permit (CDP) for new construction at 2642-2648 Newton Avenue within the Coastal Overlay Zone. Along with the relocation of the historical resource, 2642-2648 Newton Avenue is proposed to also include construction of a three-story, 33'-9" tall mixed-use development containing 14 dwelling units (including two affordable units), and 8,975 SF of warehouse space.

The 5,013 SF donor site at 1620 Union Street on the west side of Union Street between West Date and West Cedar streets from which the historical resource will be relocated, is proposed to include the construction of 24-story, 250-foot tall residential tower development containing 73 dwelling units (including eight affordable units) and 70 parking spaces within a fully-automated parking garage incorporated into levels 1 through 6.

Overall, the project complies with the Downtown and Barrio Logan Community Plans and is consistent with the land use and underlying zoning. Additionally, the project does not include any design features that would substantially increase hazards. No impacts would result.

Project Cumulative

The proposed project does not include any requirements that would result in a substantial increase in hazards due to design features or incompatible uses. Cumulative impacts would be less than significant.

Issue 4: Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
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Complete Communities PEIR

The Complete Communities PEIR determined that future development allowed under the proposed ordinances would be required to comply with all applicable City codes and policies related to emergency access and would be forwarded to the City Fire Marshall to ensure adequate emergency access. Therefore, impacts related to emergency access would be less than significant.

Project

Adequate emergency access would be provided during both short-term construction (with construction operating protocols) and long-term operations of the project. As such, the project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Impacts would be less than significant.

Project Cumulative

As discussed above, adequate emergency access would be provided during both short-term construction (with construction operating protocols) and long-term operations of the project. As such, the project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Impacts would be less than significant, including cumulative.

6.15. WILDFIRE - Would the project:

Issue 1: Expose people or structures, either directly or indirectly to a significant risk of loss, injury or death involving wildland fires?

Complete Communities PEIR

The Complete Communities PEIR determined that the Housing Program would incentivize development within Transit Priority Area (TPAs). Some of the project areas are located within or adjacent to High and Very High Fire Hazard Severity Zones as they are in proximity to vegetated areas including urban canyons with native vegetation that can pose a wildfire risk. These areas combined with the limited precipitation within the region results in the potential for wildland fires. Although some of the project areas are located within or near areas with a potential wildfire risk, the Housing Program would not change the allowable land uses within the project areas. However, due to the allowance for additional height and floor area ratio (FAR), development under the Housing Program could result in additional multi-family residential densities in certain locations compared to what would be allowed without participation in the program. By increasing the number of potential residents within areas subject to fire hazards, this could increase the exposure of people and

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
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structures to wildfire. While the project generally incentivizes housing development within urban areas that are generally less prone to wildfire risk than surrounding suburban areas, there would still be wildfire risk and potential increases in exposure to wildfire resulting from the project.

Future development that would occur under the proposed project would be required to comply with the City's Fire Code, Building Regulations, and Brush Management Regulations aimed at ensuring the protection of people or structures from potential wildland fire hazards. While implementation of and adherence to this regulatory framework would reduce potential wildfire impacts, the increase in the number of residents located within areas at risk of wildland fires could increase the exposure of people and structures to wildfires and impacts would be significant.

Project

The 2017 San Diego County Multi-Jurisdictional Hazard Mitigation Plan (SDHMP) is the San Diego region's plan toward greater disaster resilience in accordance with section 322 of the Disaster Mitigation Act of 2000. The project would not conflict with the goals, objectives, and actions of the SDHMP. Per Action 1.D.6, High fire hazard areas shall have adequate access for emergency vehicles. Project sites are located in a previously developed area with existing infrastructure and facilities currently serving the site. Additionally, the project would provide adequate access for emergency vehicles. Therefore, the project would not conflict with emergency response and would not substantially impair an adopted emergency response plan. No impacts would result.

Project Cumulative

As discussed above, the project would not conflict with emergency response and would not substantially impair an adopted emergency response plan. No impacts would result including cumulative.

Issue 2: Due to slope, prevailing winds, and other factors, exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

Complete Communities PEIR

The Complete Communities PEIR determined that some of the project areas are located within or adjacent to High and Very High Fire Hazard Severity Zones. The potential for wildland fires represents a hazard, particularly within areas adjacent to open space or within close proximity to wildland fuels. Future development under the proposed project would be required to comply with the City's Fire Code, Building Regulations, and Brush Management Regulations to ensure that wildfire risks are not exacerbated. Transportation infrastructure and amenities associated with the Mobility Choices Program would not exacerbate wildfire hazards due to the location of such improvements within existing urban road right-of-ways.

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
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However, the Mobility Choices Program would also incentivize housing development within Mobility Zones 1, 2, and 32 that could be exposed to wildfire risk. Implementation of the existing regulatory framework would help reduce the availability of fuels that could contribute to the spread of potential wildfires. Future development under the proposed project would be required to address site-specific factors to minimize the risk of fires in accordance with the applicable regulations.

Additionally, the proposed project would not change the allowable land uses within the project areas and it would not expand the potential locations of future multi-family development. However, the proposed project could increase the number of persons that would be located in areas subject to potential wildfire hazards. While it is not anticipated the proposed project would exacerbate wildfire risk, residents may be exposed to pollutant concentrations associated with wildfire. Therefore, impacts related to pollutant concentrations from a wildfire would be significant.

Project

Both project sites are generally flat, located within an existing urban neighborhood surrounded by residential uses and are not located in a Very High Fire Severity Zone. Due to the location of the project, the project would not have the potential to expose occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire. Therefore, no impacts would result.

Project Cumulative

Both project sites are generally flat, located within an existing urban neighborhood surrounded by residential uses and is not located in a Very High Fire Severity Zone. Due to the location of the project, the project would not have the potential to expose occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire. No cumulative impacts would occur.

Issue 3: Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

Complete Communities PEIR

The Complete Communities PEIR determined that there are some areas within the project areas that may have existing infrastructure deficiencies and may require capacity improvements to serve future projects implemented under the proposed ordinances mandatory compliance with City standards would likely preclude significant environmental impacts associated with future construction and/or improvements to the existing utility infrastructure. However, given that future specific development projects are unknown at this time, the analysis concludes that the physical impacts associated with installation of and/or improvements to utilities infrastructure would be

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
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significant and unavoidable. Future utility and infrastructure improvements would be focused within existing Mobility Zones 1, 2, and 32 and would be required to comply with all applicable City standards; thus, these improvements are not likely to exacerbate fire risk. However, at this programmatic level of review, potential temporary or ongoing impacts to the environment due to the installation or maintenance of infrastructure would be significant.

Project

The project is currently served by existing infrastructure which would service the site during and after construction. The project area has adequate fire hydrant services and street access. No new infrastructure is proposed to support the project that may exacerbate fire risk. No impacts would result.

Project Cumulative

As discussed above, no new infrastructure is proposed to support the project that may exacerbate fire risk. No cumulative impacts would occur.

Issue 4: Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

Complete Communities PEIR

The Complete Communities PEIR determined that impacts related to flooding were found to be significant and unavoidable primarily due to the fact that the proposed ordinances could facilitate and increase development potential within areas protected by a provisionally accredited levy within Mission Valley.

The PEIR determined that approximately 798 acres of the project areas are located on a geologic unit or soil that is at risk of landslides. However, implementation of site-specific recommendations provided within a required geotechnical investigation would reduce impacts associated with landslides, slope instability, and mudflows to less than significant.

The PEIR determined that the proposed project would not change existing allowable land uses within the project areas and it would not expand the locations where potential multi-family residential housing could be built. While the proposed project areas could be subject to risks associated with downstream flooding or landslides, the existing regulatory framework related to flooding and geologic hazards would minimize potential risks. However, based on the potentially significant flooding risk identified in, potential flooding risks would also be significant.

Project

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
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The project area is within developed urban neighborhood. The project would comply with the City's Landscape Regulations and Land Development Code. The project would not expose people or structures to significant risk from flooding or landslide as a result of runoff, post-fire instability, or drainage changes. Therefore, no impacts would occur.

Project Cumulative

The project would not expose people or structures to significant risk from flooding or landslide as a result of runoff, post-fire instability, or drainage changes. No cumulative impacts would occur.

6.16. VISUAL EFFECTS AND NEIGHBORHOOD CHARACTER – Would the project:

Issue 1: Result in a substantial obstruction of a vista or scenic view from a public viewing area?

Complete Communities PEIR

The Complete Communities PEIR determined that the Housing Program would apply citywide within TPAs in zones that allow multi-family housing. In exchange for new development that provides affordable housing units and neighborhood-serving infrastructure improvements, the Housing Program would allow additional building square footage and height beyond what is otherwise allowed in the base zone, Planned District Ordinance (PDO), or applicable Community Plan. Height incentives would only apply outside the City's Coastal Zone. Within the Coastal Zone, the existing 30-foot height limit would continue to apply, which would limit the maximum height and densities that could be accommodated in coastal areas.

Development associated with the Housing Program is not anticipated to affect scenic views or vista from designated scenic highways in the City. The only state-designated scenic highway in close proximity to the project areas is SR-163. However, the designated scenic portion of SR-163 is located within a canyon and due to topography, surrounding future development would not be visible from this scenic road. Thus, the proposed project would not adversely affect scenic views or vistas from a state-designated scenic highway.

The Housing Program's height incentives would not apply within the Coastal Zone; therefore, impacts to scenic vistas or scenic views from a public viewing area within the Coastal Zone would be minimized as future development would be required to adhere to the 30-foot height limit. However, views toward the coast could be affected by development with TPAs that are located near coastal areas, but outside of the Coastal Zone. For example, development within TPAs along Morena Boulevard could block views toward the coast for residents in Clairemont Mesa. While residential views are not protected views, views toward the coast from public parks within Clairemont Mesa could be affected. Similarly, there are numerous scenic parks and public viewing locations throughout the City. Development under the Housing Program could change scenic views and vistas from public viewing locations where TPAs are visible throughout the City.

Project

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
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The project site is not located within, or adjacent to a designated scenic vista or view corridor that is identified in the Downtown Community Plan or the Barrio Logan Community Plan. Therefore, the project would not have a substantial adverse effect on a scenic vista. No impact would result.

Project Cumulative

As discussed above, the project site is not located within, or adjacent to a designated scenic vista or view corridor that is identified in the Downtown Community Plan of the Barrio Logan Community Plan. Therefore, the project would not have a substantial adverse effect on a scenic vista. No impacts including cumulative impacts would result.

Issue 2: Result in a substantial adverse alteration (e.g., bulk, scale, materials, or style) to the existing or planned (adopted) character of the area?

Complete Communities PEIR

The Complete Communities PEIR determined the Housing Program would allow for additional building square footage and height beyond the allowance in the applicable base zone, PDO, or applicable Community Plan. Height incentives would only apply outside of the City's Coastal Zone. Within the Coastal Zone, the existing 30-foot height limit would continue to apply, which would limit the maximum densities that could be accommodated in coastal areas and reduce the potential for adverse impacts to neighborhood character that could result from structure heights that are greater than what currently exists. Within the Coastal Zone, FAR incentives would still apply; however, the ability to achieve the highest FAR would be limited by the 30-foot height limit. While the 30-foot height limit would restrict building square footage, the FAR incentives within the Coastal Zone could result in development that is inconsistent with the existing neighborhood character. Outside of the Coastal Zone, height restrictions related to development in proximity to airports would continue to apply which could limit the height and intensity of development that could occur within areas proximate to airports. Furthermore, market and construction factors could contribute to height limitations.

Under the Housing Program, development of a certain size would be required to provide public amenities as discussed in Section 3.5.1.3 of this PEIR. Future development would also be required to incorporate design features that enhance neighborhood character and minimize adverse impacts associated with increased bulk, scale, and height. Building materials, style, and architectural features would be reviewed to ensure the character of development meets required development standards.

Development would also be required to adhere to the City's landscape regulations which would support neighborhood compatibility. Nevertheless, implementation of the Housing Program could result in development at densities and heights that could substantially alter the existing neighborhood character. While the Housing Program is intended to create a more vibrant, pedestrian-oriented community with transit supportive development, implementation of the

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
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proposed ordinance could result in a substantial change to the existing character within the project areas. Thus, at this programmatic level of review, impacts associated with neighborhood character would be significant.

Project

Both project sites are in fully developed urbanized areas. This type of development has been previously analyzed in the Complete Communities PEIR. The architecture of the Union site is utilizing the incentives of the Complete Communities PEIR. There are similar high-rise towers within the immediate vicinity of the Union site. The architecture of the Newton site is in line with existing development in the neighborhood. There would not be a substantial adverse alteration to the existing or planned (adopted) character of the area.

Project Cumulative

No impact that has not been previously analyzed would occur. . This type of development has been previously analyzed in the Complete Communities PEIR. The architecture of the Union site is utilizing the incentives of the Complete Communities PEIR. The proposed project sites are located in fully developed urbanized areas. The architecture of the proposed projects are in line with the surrounding development. There would not be a substantial adverse alteration to the existing or planner (adopted) character of the area. No cumulative impacts would occur.

Issue 3: Result in the loss of any distinctive or landmark tree(s), or stand of mature trees?

Complete Communities PEIR

While the City has policies related to tree preservation in place that are intended to preserve distinctive, landmark, and mature trees to the extent practicable, it is possible that future development could nonetheless adversely impact such trees. At this programmatic level of review, and without project-specific development plans, impacts associated with the loss of any distinctive or landmark trees or any stand of mature trees would be significant.

Project

The proposed project sites are in fully developed, urbanized areas. There are not any distinctive landmark tree(s) or stand of mature trees within either project site. No impacts would occur.

Project Cumulative

There are no distinctive landmark tree(s) or stand of mature trees within either project site. No cumulative impacts would occur.

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
Issue 4: Result in a substantial change in the existing landform?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Complete Communities PEIR

The Complete Communities PEIR determined that transportation infrastructure resulting from implementation of the Mobility Choices Program is not anticipated to result in changes to the existing landform because improvements are anticipated to occur within public rights-of-way, and/or along existing developed streets. Due to the developed nature of such areas, landform alteration is not anticipated. Development associated with the Housing Program could result in changes to existing landforms depending on the constraints and slope associated with a particular project site. While existing canyons and slopes throughout the project areas are largely protected from development due to their status as Multi-Habitat Planning Areas (MHPA), the project areas could contain steep slopes or other topographical features that could be impacted by development. The City's Environmentally Sensitive Lands (ESL) regulations would protect steep hillsides (defined as hillsides at least 50 feet deep with a slope of 25 percent or greater). Should a proposed project include impacts to ESL-defined steep hillsides, the project would require a site development permit, including subsequent environmental review, in order to address potential impacts to ESL protected slopes. While existing protections are in place to preserve the City's canyons and steep slopes, specific development proposals and grading quantities are not known at this time. It is possible that future development under the Housing Program could result in substantial landform alteration. Even with future discretionary review for projects that impact ESL defined steep slopes, impacts would be significant.

Project

The proposed project sites are flat, developed lots, in urbanized areas. There would be no alteration to existing landforms.

Project Cumulative

The proposed project sites are flat, developed lots, in urbanized areas. There would be no alteration to existing landforms. No Cumulative impacts would occur.

Issue 5: Create substantial light or glare which would adversely affect daytime or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Complete Communities PEIR

Sources of light within the project areas include those typical of an urban community, such as building lighting for residential and commercial land uses, roadway infrastructure lighting, and signage. Future development associated with the Housing Program would introduce new residential interior and exterior lighting, parking lot lighting, commercial signage lighting, and lamps for streetscape and public recreational areas. Transportation infrastructure associated with the Mobility

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
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Choices Program could also include additional roadway lighting within or along public rights-of-way.

Future development would be required to comply with the applicable outdoor lighting regulations of the SDMC (§142.0740 et seq.) which would require development to minimize negative impacts from light pollution including light trespass, glare, and urban sky glow. Compliance with these regulations would preserve enjoyment of the night sky and minimize conflict caused by unnecessary illumination. New outdoor lighting fixtures must minimize light trespass in accordance with the California Green Building Standards Code, where applicable, or otherwise shall direct, shield, and control light to keep it from falling onto surrounding properties.

Future development associated with the Housing Program would also be required to comply with SDMC Section 142.0730 to limit the amount of reflective material on the exterior of a building that has a light reflectivity factor greater than 30 percent to a maximum of 50 percent. Additionally, per SDMC Section 142.0730(b), reflective building materials are not permitted where it is determined that their use would contribute to potential traffic hazards, diminish the quality of riparian habitat, or reduce enjoyment of public open space. Therefore, through regulatory compliance, the proposed project would not create substantial light or glare that would adversely affect daytime or nighttime views in the area, and impacts would be less than significant.

Project

The project would comply with the outdoor lighting standards in Municipal Code Section 142.0740 (Outdoor Lighting Regulations) that require all outdoor lighting be installed, shielded, and adjusted so that the light is directed in a manner that minimizes negative impacts from light pollution, including trespass, glare, and to control light from falling onto surrounding properties. Therefore, lighting installed with the project would not adversely affect day or nighttime views in the area, resulting in a less than significant lighting impact. Glare The project would comply with Municipal Code Section 142.0730 (Glare Regulations) that require exterior materials utilized for proposed structures be limited to specific reflectivity ratings. The structures would consist of wood siding, wood shingles, adobe and concrete blocks, brick, stucco, concrete, or natural stone. The project would have a less than significant glare impact. As such, the project would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area; impacts would be less than significant.

Project Cumulative

The project would have a less than significant glare impact. As such, the project would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area; impacts would be less than significant. Based upon the above analysis, the proposed project would have no cumulative impacts.

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>6.17. MANDATORY FINDINGS OF SIGNIFICANCE – The lead agency shall find that a project may have a significant effect on the environment and thereby require an EIR to be prepared for the project where there is substantial evidence, in light of the whole record, that any of the following conditions may occur. Where prior to commencement of the environmental analysis a project proponent agrees to mitigation measures or project modifications that would avoid any significant effect on the environment or would mitigate the significant environmental effect, a lead agency need not prepare an EIR solely because without mitigation the environmental effects would have been significant (per Section 15065 of the State CEQA Guidelines):</p>					
<p>a) 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?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Complete Communities PEIR

The Complete Communities PEIR determined that the Housing Solutions and Mobility Choices would result in significant and unavoidable impacts related to air quality; biological resources; historical, archaeological, and tribal cultural resources; hydrology/water quality; noise; public services and facilities; transportation; public utilities and infrastructure; wildfire; and visual effects and neighborhood character.

Project

As documented in this Initial Study, the project may have the potential to degrade the quality of the environment, notably with respect to Cultural Resources (Built Environment), Cultural Resources (Archaeology), and Tribal Cultural Resources. As such, mitigation measures have been incorporated to reduce impacts to less than significant as outlined within the Initial Study.

Project Cumulative

As documented in this Initial Study, the project may have the potential to degrade the quality of the environment, notably with respect to Cultural Resources (Built Environment), Cultural Resources (Archaeology), and Tribal Cultural Resources. As such, mitigation measures have been incorporated to reduce impacts to less than significant as outlined within the Initial Study. Based upon the above analysis, the proposed project would have no cumulative impacts.

<p>b) 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 probable future projects)?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
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Complete Communities PEIR

The Complete Communities PEIR determined that the Housing Solutions and Mobility Choices would result in significant and unavoidable impacts related to air quality; biological resources; historical, archaeological, and tribal cultural resources; hydrology/water quality; noise; public services and facilities; transportation; public utilities and infrastructure; wildfire; and visual effects and neighborhood character.

Project

CEQA Guidelines Section 15064(i) states that a Lead Agency shall consider whether the cumulative impact of a project is significant and whether the effects of the project are cumulatively considerable. The assessment of the significance of the cumulative effects of a project must, therefore, be conducted in connection with the effects of past projects, other current projects, and probable future projects. Cumulative environmental impacts are those impacts that by themselves are not significant, but when considered with impacts occurring from other projects in the vicinity would result in a cumulative impact. Related projects considered to have the potential of creating cumulative impacts in association with the project consist of projects that are reasonably foreseeable and that would be constructed or operated during the life of the project. The project would be located in a developed area that is largely built out. No other construction projects are anticipated in the immediate area of the project.

As documented in this Initial Study, the project may have the potential to degrade the environment as a result of Cultural Resources (Archaeology), and Tribal Cultural Resources impacts, which may have cumulatively considerable impacts when viewed in connection with the effects of other potential projects in the area. As such, mitigation measures have been identified to fully mitigate and reduce impacts to a less than significant level. Other future projects within the surrounding area would be required to comply with applicable local, State, and Federal regulations to reduce potential impacts to less than significant, or to the extent possible. As such, the project is not anticipated to contribute to potentially significant cumulative environmental impacts. Project impacts would be less than significant.

Project Cumulative

As documented in this Initial Study, the project may have the potential to degrade the quality of the environment, notably with respect to Cultural Resources (Built Environment), Cultural Resources (Archaeology), and Tribal Cultural Resources. As such, mitigation measures have been incorporated to reduce impacts to less than significant as outlined within the Initial Study. Based upon the above analysis, the proposed project would have no cumulative impacts.

- c) Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?

Complete Communities PEIR

Issues	Potentially Significant Impact	Project Impact Adequately Addressed in the PEIR	Less Than Significant with Project-Level Mitigation Incorporated	Less Than Significant Impact	No Impact
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The Complete Communities PEIR determined that the Housing Solutions and Mobility Choices would result in significant and unavoidable impacts related to air quality; biological resources; historical, archaeological, and tribal cultural resources; hydrology/water quality; noise; public services and facilities; transportation; public utilities and infrastructure; wildfire; and visual effects and neighborhood character.

Project

As discussed throughout this document, it is not anticipated that the construction and operation of the project would cause environmental effects that would significantly directly or indirectly impact human beings. All impacts identified as being significant have been mitigated to below a level of significance. For this reason, all environmental effects fall below the thresholds established by the City of San Diego. Impacts would be less than significant.

Project Cumulative

As documented in this Initial Study, the project may have the potential to degrade the quality of the environment, notably with respect to Cultural Resources (Built Environment), Cultural Resources (Archaeology), and Tribal Cultural Resources. As such, mitigation measures have been incorporated to reduce impacts to less than significant as outlined within the Initial Study. Based upon the above analysis, the proposed project would have no cumulative impacts.

7 SUPPORTING INFORMATION SOURCES

Land Use

City of San Diego General Plan
Barrio Logan Community Plan
Downtown Community Plan
City of San Diego Zoning Maps

Air Quality

Regional Air Quality Strategies (RAQS) - APCD

Biology

City of San Diego, Multiple Species Conservation Program (MSCP), Subarea Plan, 1997
City of San Diego, "Vegetation Communities with Sensitive Species and Vernal Pools"
City of San Diego, MSCP, "Multiple Habitat Planning Area maps, 1997"

Energy

Geology/Soils/Seismicity

City of San Diego Seismic Safety Study

Greenhouse Gas Emissions

Union Newton Project Climate Action Plan Consistency Checklist

Health and Safety

San Diego County Hazardous Materials Environmental Assessment Listing
FAA Determination
Airport Land Use Compatibility Plan

Historical/Archaeological/Tribal Cultural Resources

City of San Diego Historical Resources Guidelines

Hydrology/Water Quality

Federal Emergency Management (FEMA), National Flood Insurance Program-Flood Boundary and Floodway Map

Noise

City of San Diego General Plan

Paleontological Resources

City of San Diego Paleontological Guidelines

Public Services and Facilities

City of San Diego General Plan
Barrio Logan Community Plan
Downtown Community Plan

Public Utilities and Infrastructure

City of San Diego General Plan
Barrio Logan Community Plan
Downtown Community Plan

Transportation

City of San Diego General Plan
Barrio Logan Community Plan
Downtown Community Plan

Wildfire

Visual Effects and Neighborhood Character

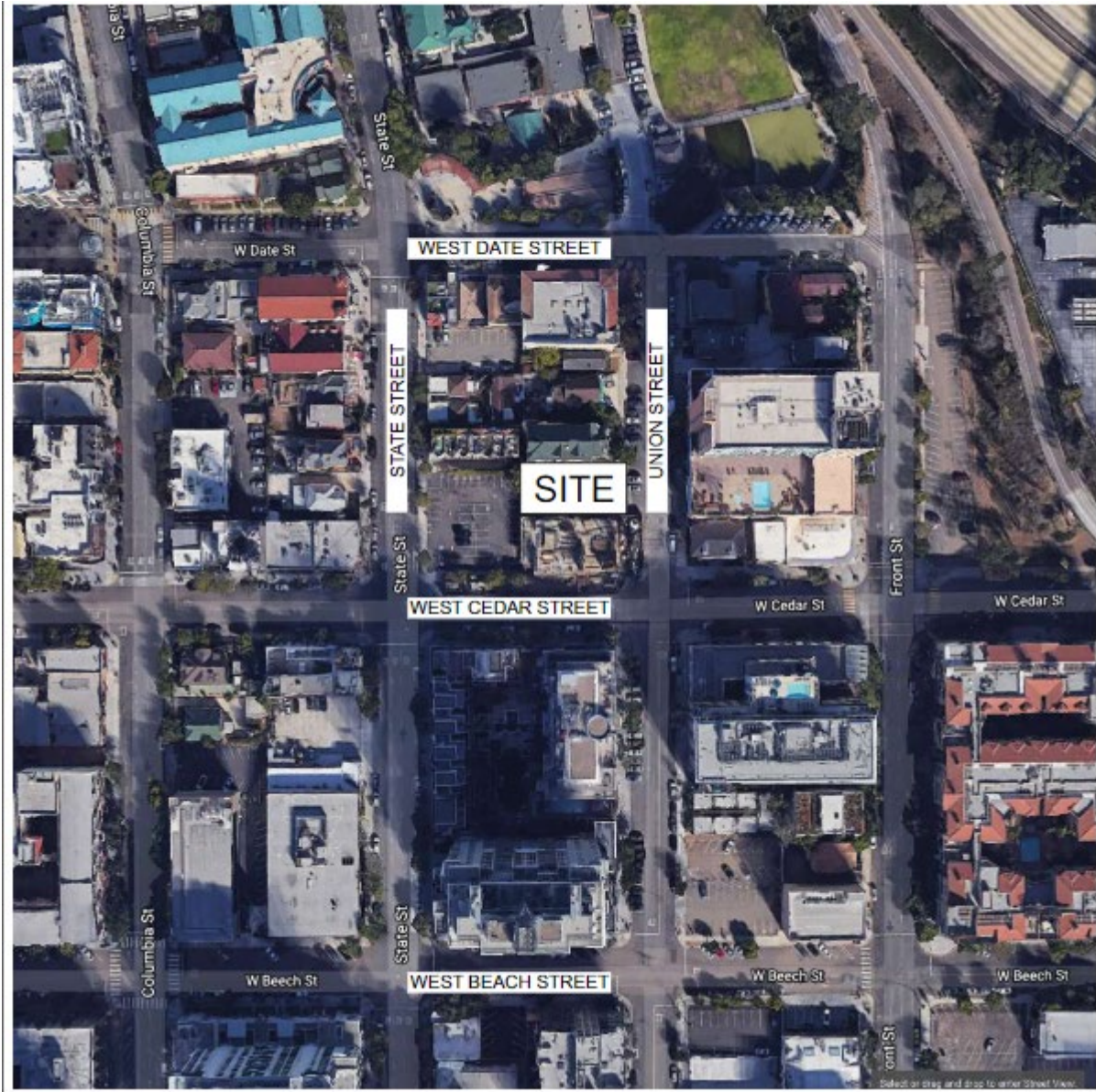
Revised: January 2022

8 LIST OF ABBREVIATED TERMS

Sample

EIR	Environmental Impact Report
MND	Mitigated Negative Declaration
Program EIR	Program Environmental Impact Report

All figures should be placed at the end of the Tiered ISMND



Location Map -Union Site

Union Newton Sites CDP SDP/Project No. 694291

City of San Diego – Development Services Department

FIGURE

No. 1

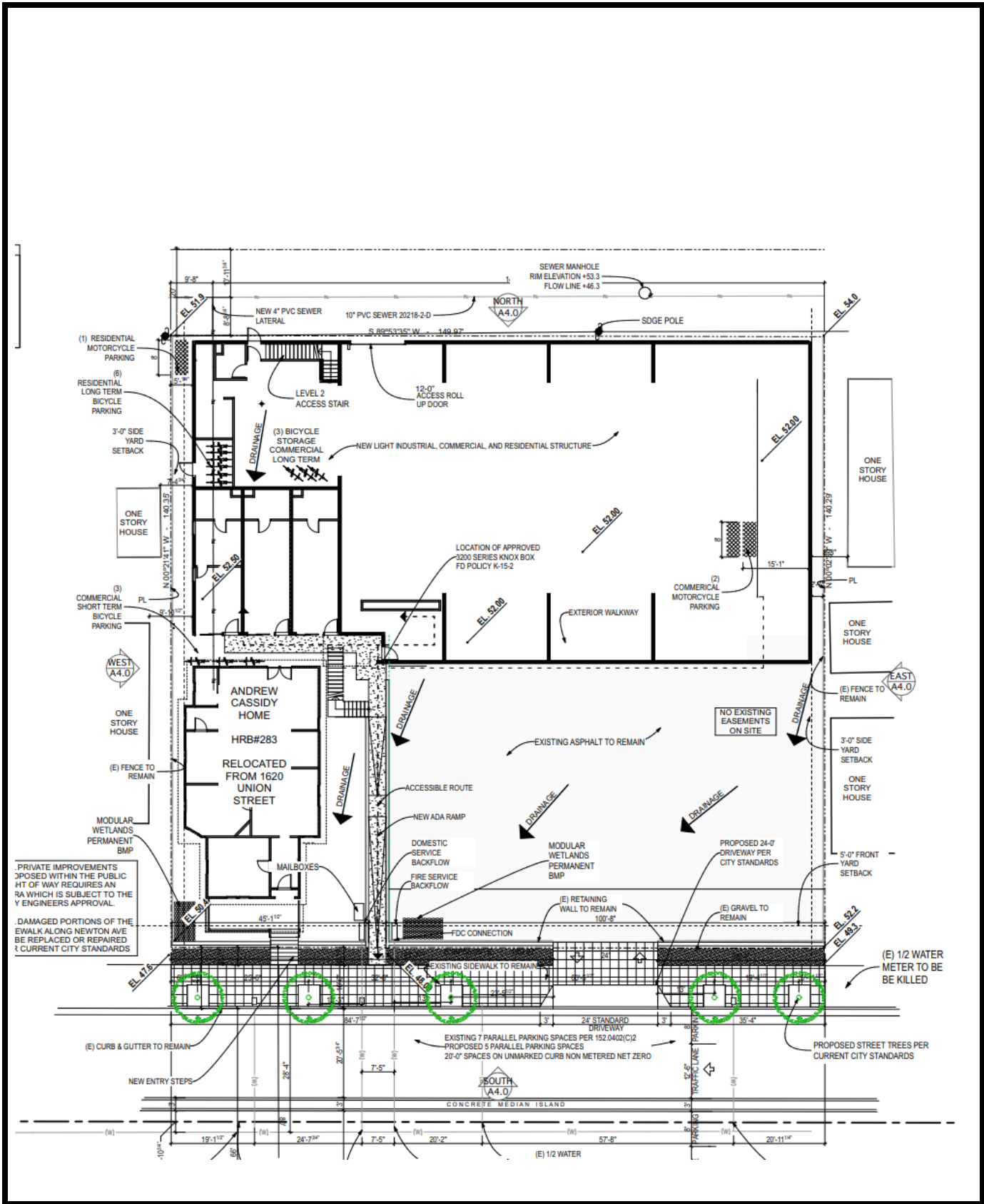


Location Map -Newton Site

Union Newton Sites CDP SDP/Project No. 694291
City of San Diego – Development Services Department

FIGURE

No. 2



Site Plan – Newton Site
 Union Newton Sites CDP SDP/Project No. 694291
 City of San Diego – Development Services Department

FIGURE
No. 3