THE CITY OF SAN DIEGO

ADDENDUM

Project No. 1068155
Addendum to EIR No. 2022090061

SUBJECT: **LUSK ON LUSK PROJECT**: COASTAL DEVELOPMENT PERMIT (CDP) for the demolition of 278,491 square feet (SF) of office and light industrial space split among six buildings. Once demolished the project would construct approximately 1,283,190 SF of research and development (R&D) space split among four buildings with 30,000 SF of tenant-serving amenity space (such as gym facilities, bike facilities, large conference hall, public art, information and welcoming hub, coffee shop, and restaurant) and two parking structures (LP1 and LP2) consisting of 1,083,080 SF of space. The project is consistent with the setback and floor area ratio requirements for the Light Industrial (IL-2-1) zone set forth in Chapter 13, Article 01, Division 06, *Industrial Base Zones* of the City of San Diego (City) Municipal Code (SDMC), and the project's maximum height of 210 feet would not exceed any height limitations. The site is within the Airport Land Use Compatibility Overlay Zone (Marine Corps Air Station [MCAS] Miramar), the Airport noise contours (60-65 decibel [dB] community noise equivalent level [CNEL] contour), Airport Influence Area (MCAS Miramar Review Area 1), the Airport Safety Zone MCAS Miramar (Transition Zone), the Coastal Overlay Zone Non-Appealable – 1, the Very High Fire Severity Zone (VHFHSZ), Transit Priority Area, and Prime Industrial Lands.

I. SUMMARY OF ORIGINAL PROJECT

Mira Mesa Community Plan (MMCP) Update – Program Environmental Impact Report (PEIR)

The project site has been analyzed within the Mira Mesa Community Plan PEIR State Clearinghouse Number (SCH No.) 2022090061 the PEIR prepared for the MMCP was certified by the San Diego City Council on December 14, 2022, per Resolution No. R-314479. The PEIR analyzed a comprehensive update of the MMCP, which incorporates relevant policies from the City of San Diego General Plan and provides a long-range, comprehensive policy framework and vision for growth and development in the Mira Mesa community. The MMCP provides community-specific policies that further implement the General Plan with respect to the distribution and arrangement of land uses and the local street and transit network; implementation of urban design guidelines; recommendations preserving and enhancing natural open space and historical and cultural resources; and prioritization and provision of public facilities within the Mira Mesa community. The PEIR conducted a program-level analysis that would require the implementation of the associated Mitigation Framework. The Mitigation Framework contains Mitigation Measures for air quality (air quality plans, Regional Air Quality Strategy [RAQS]), historical resources, and noise (construction and vibration).

II. SUMMARY OF PROPOSED PROJECT

The project is within the MMCP Area in the City in southwestern San Diego County (Figure 1, *Regional Location*). The project is requesting a CDP for the demolition of 278,491 SF of office and light industrial uses split among six buildings (Figure 2, *Aerial Photograph*). Once demolished the project would construct approximately 1,283,190 SF of R&D space split among four buildings with 30,000 SF of tenant-serving amenity space (such as gym facilities, bike facilities, large conference hall, public art, information and welcoming hub, coffee shop, and restaurant) and two parking structures (LP1 and LP2) consisting of 1,083,080 SF of space (Figure 3, *Site Plan*). The project is consistent with the setback and floor area ratio requirements of the IL-2-1 zone set forth in Chapter 13, Article 01, Division 06, *Industrial Base Zones* of the SDMC, and the project's maximum height of 210 feet would not exceed any height limitations.

Vehicular access is proposed via four driveways on Lusk Boulevard; two driveways on the west side of the project and two driveways on the east side of the project would provide access to the two parking garages. Two additional right-in/right-out/left-in loading/unloading driveways are proposed between buildings L1 and L2 for truck and rideshare service access. Additionally, as a part of implementing the ultimate classification of Lusk Boulevard as a 4-Lane Major Arterial, the project would provide half-width improvements to include a raised median, a Class II buffered bike lane, and a 22-foot parkway along the project frontage on the south side of Lusk Boulevard.

Site preparation would include the demolition and removal of six structures and associated landscaping, including shrubs and trees. Grading is estimated to require 211,000 cubic yards (CY) of cut and 37,000 CY of fill, resulting in the export of 174,000 CY of material. Project construction is anticipated to last approximately 19 months and would include construction best management practices (BMPs) such as daily water application and vehicle speed limitations to reduce fugitive dust emissions. Eight of the existing trees on the project site would be preserved in place, and an additional 138 canopy trees would be planted, along with a variety of hedges and ornamental vegetation.

Additionally, the project site is subject to and complies with all applicable development standards of the Airport Land Use Compatibility Overlay Zone (MCAS Miramar), the Airport noise contours (60-65 dB CNEL contour), Airport Influence Area (MCAS Miramar Review Area 1), the Airport Safety Zone MCAS Miramar (Transition Zone), the Coastal Overlay Zone Non-Appealable – 1, the VHFHSZ, TPA, and Prime Industrial Lands.

III. ENVIRONMENTAL SETTING:

The project site is in an existing office and industrial park with six buildings and surface parking. Surrounding land uses include light industrial and commercial to the northeast, east, and south; residential to the west; and open space to the northwest. The project site is surrounded by existing development on all sides and is not adjacent to open space, canyons, or conserved lands associated with the Multi-Habitat Planning Area (MHPA).

IV. ENVIRONMENTAL DETERMINATION

The City previously prepared and certified the MMCP PEIR SCH No. 2022090061 per Resolution No. R-314479 on December 14, 2022. Based on all available information in light of

the entire record, the analysis in this Addendum, and pursuant to Section 15162 and 15164 of the State CEQA Guidelines, the City has determined the following:

- There are no substantial changes proposed in the project which will require major revisions of the previous environmental document due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

- Substantial changes have not occurred with respect to the circumstances under which the project is undertaken which will require major revisions of the previous environmental document due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; and

  There is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous environmental document was certified as complete or was adopted, that shows any of the following:

  a) The project will have one or more significant effects not discussed in the previous environmental document;

  b) Significant effects previously examined will be substantially more severe than shown in the previous environmental document;

  c) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or

  d) Mitigation measures or alternatives which are considerably different from those analyzed in the previous environmental would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

Based upon a review of the current project, none of the situations described in Sections 15162 of the State CEQA Guidelines apply. No changes in circumstances have occurred, and no new information of substantial importance has manifested, which would result in new significant or substantially increased adverse impacts as a result of the project. Therefore, this Addendum to the PEIR has been prepared in accordance with Section 15164 of the CEQA State Guidelines. Public review of this Addendum is not required per CEQA.

V. IMPACT ANALYSIS

This Addendum includes the environmental issues analyzed in detail in the previously certified PEIR as well as the project-specific environmental analysis pursuant to CEQA. The analysis in this document evaluates the adequacy of the PEIR relative to the project and documents that the proposed modifications and/or refinements would not cause new or

more severe significant impacts than those identified in the previously certified environmental document.

The PEIR identified significant impacts related to air quality; historical, archaeological, and tribal cultural resources; noise; public services and facilities; public utilities; transportation; and visual effects and neighborhood character. In some cases, Mitigation Measures were deemed infeasible, and the Mitigation Measures that were identified failed to bring impacts to below a level of significance. The PEIR determined that all significant impacts identified would remain unmitigated.

This Addendum includes the subsequent impact analysis to demonstrate that environmental impacts associated with the proposed project are consistent with or not greater than the impacts disclosed in the previously certified PEIR. This Addendum includes an analysis of the project consistent with the environmental issues analyzed in detail in the previously certified PEIR. The analysis in this document evaluates the adequacy of the PEIR relative to the project and documents that the proposed modifications and/or refinements would not cause new or more severe significant impacts than those identified in the previously certified environmental document.

The following analysis indicates there would be no new significant impacts, nor would there be an increase in the severity of impacts resulting from the project. Further, there is no new information in the record or otherwise available indicating that there are substantial changes in circumstances that would require major changes to the PEIR. A comparison of the project's impacts related to those of the certified PEIR is provided below in Table 1, *Impact Assessment Table*.

Table 1, *Impact Assessment Table*

Issue Area	PEIR	PEIR Mitigation	Project	Project Level New Mitigation?	Project Resultant Impacts
Air Quality	Significant, Unmitigated	Yes	No New Impacts	No	Less than Significant
Biological Resources	Less than Significant	No	No New Impacts	No	Less than Significant
Geology and Soils	Less than Significant	No	No New Impacts	No	Less than Significant
Greenhouse Gas Emissions	Less than Significant	No	No New Impacts	No	Less than Significant
Historical, Archaeological, and Tribal Cultural Resources	Significant, Unmitigated	Yes	No New Impacts	No	Less than Significant
Hazards and Hazardous Materials	Less than Significant	No	No New Impacts	No	Less than Significant
Hydrology and Water Quality	Less than Significant	No	No New Impacts	No	Less than Significant
Land Use	Less than Significant	No	No New Impacts	No	Less than Significant
Noise	Significant, Unmitigated	Yes	No New Impacts	No	Significant, Mitigated
Public Services and Facilities	Significant, Unmitigated	No	No New Impacts	No	Less than Significant
Public Utilities	Significant, Unmitigated	No	No New Impacts	No	Less than Significant
Transportation	Significant, Unmitigated	No	No New Impacts	No	Significant, Unmitigated
Visual Effects and Neighborhood Character	Significant, Unmitigated	No	No New Impacts	No	Less than Significant

Air Quality

PEIR

Air Quality impacts are evaluated in Section 5.1 of the PEIR.

Air Quality Plan Conflict

The PEIR determined that because the proposed MMCP would result in greater density than the adopted MMCP, future emissions associated with the buildout of the MMCP area would be greater than future emissions associated with buildout of the adopted land uses. Therefore, emissions of ozone precursors (volatile organic compounds and nitrous oxide) would be greater than what is accounted for in the RAQS. The MMCP must implement PEIR Mitigation Measure AQ-1, which requires the City to provide the San Diego Association of Governments (SANDAG) with a revised land use map and housing employment forecast for the MMCP area in order to update the RAQS and

State Implementation Plan (SIP). However, even with this Mitigation Framework, the PEIR identified the project and cumulative impacts as significant and unavoidable.

Air Quality Violation

The PEIR identified that at the program level, the MMCP would exceed air quality standards during both construction and operation, as determined in the California Emissions Estimator Model (CalEEMod). The MMCP must implement PEIR Mitigation Measures AQ-2 and AQ-3. PEIR Mitigation Measure AQ-2 requires future projects in the MMCP area to analyze construction-related air quality impacts and incorporate mitigation if results are found to be potentially significant. PEIR Mitigation Measure AQ-3 requires best available control measures/technology be incorporated into individual construction projects that exceed the daily emissions thresholds established by the City. Even with this Mitigation Framework, the PEIR identifies the project and cumulative impacts as significant and unavoidable.

Sensitive Receptors

The PEIR identified that peak hour traffic volumes at all intersections would remain below the screening threshold for carbon monoxide (CO) hotspots under the proposed MMCP. Additionally, future projects in the MMCP area would consider air quality and air pollution sources in the siting, design, and construction of sensitive receptors. Implementation of the proposed MMCP would not result in a localized CO hotspot and would not expose sensitive receptors to elevated levels of toxic air contaminants during construction or operation. The PEIR identifies project and cumulative impacts as less than significant, and no mitigation is required.

Odors

The PEIR identified that potential construction-generated odors would be localized, temporary, intermittent, and not expected to affect a substantial number of people. The proposed MMCP would not introduce land uses that would generate substantial odor during operations. Therefore, the PEIR identified project and cumulative impacts associated with odors as less than significant, and no mitigation is required.

Project

An Air Quality Technical Report was prepared for the project by HELIX Environmental Planning, Inc. (HELIX; August 2023) in accordance with the PEIR Mitigation Framework. The Air Quality Technical Report can be found as Appendix A to this Addendum.

Air Quality Plan Conflict

The project would be consistent with the designated MMCP land uses and zoning. Project emissions during both construction and operations would not exceed the RAQS and would not violate an air quality standard, as described in the Air Quality Technical Report in Appendix A. Impacts would be less than significant.

Air Quality Violation

The project would be consistent with the designated MMCP land uses and zoning and is not anticipated to exceed daily construction emissions thresholds or to have a significant impact on air quality, as described in the project's Air Quality Technical Report in Appendix A. As a result, PEIR Mitigation Measure AQ-3 would not apply. Impacts would be less than significant.

Sensitive Receptors

Project construction would involve heavy-duty diesel equipment, but any resultant pollutant emissions would be short-lived and below the significance level threshold, as described in the project's Air Quality Technical Report in Appendix A. The project involves R&D uses that would not cause traffic volumes of a high enough quantity to create delays that could lead to CO hotspots. Therefore, the project is not anticipated to cause sensitive receptors to be exposed to substantial pollutant concentration. The project would be consistent with the designated MMCP land uses and zoning. Impacts would be less than significant.

Odors

Due to the type of project (R&D) and project location, the project is not anticipated to create objectionable odors for a substantial number of people. Land uses associated with odor complaints typically include sewage treatment plants, landfills, recycling facilities, and manufacturing. The project does not involve any of these uses, and none of these uses are present in the project vicinity. Additionally, the project would comply with SDMC/Land Development Code (LDC), as well as the San Diego Air Pollution Control District (SDAPCD) requirements, as described in the project's Air Quality Technical Report in Appendix A. The project would be consistent with the designated MMCP land uses and zoning. Impacts would be less than significant.

Conclusion

Based on the foregoing analysis and information, there is no evidence that implementation of the project would require a major change to the PEIR. The PEIR identified Mitigation Measures AQ-1, AQ-2, and AQ-3. The project completed a project-specific air quality impact analysis consistent with PEIR Mitigation Measure AQ-2. Project-related emissions would not exceed the SDAPCD and City of San Diego thresholds during either construction or operation. The project would not conflict with the SIP, Air Quality Management Plan, or RAQS, nor would it produce objectionable odors. No significant or adverse Air Quality impacts would occur with the construction or operation of the proposed project. The project would be required to comply with SDAPCD guidelines during grading and ground-disturbing activities, reducing fugitive dust. Therefore, PEIR Mitigation Measures AQ-1 and AQ-3 are not applicable to the project. The project would not result in a new significant Air Quality impact nor a substantial increase in the severity of Air Quality impacts from those described in the PEIR. No mitigation measures related to Air Quality would be required.

Biological Resources

PEIR

Biological Resources impacts are evaluated in Section 5.2 of the PEIR.

Sensitive Species

The PEIR identified that the implementation of the proposed MMCP has the potential to impact sensitive plant and wildlife species either directly through the loss of habitat (including critical habitat) and/or direct take, or indirectly by placing development in or adjacent to sensitive habitat. Potential impacts on federal- or state-listed species, Multiple Species Conservation Program (MSCP) Covered Species, Narrow Endemic Species, plant species with a California Native Plant Society Rare Plant Rank of 1 or 2, and wildlife species included on the California Department of Fish and Wildlife

(CDFW)'s Special Animals List would be significant. Potential impacts on sensitive species and/or designated critical habitat of listed species would be mitigated in accordance with City's Environmentally Sensitive Lands (ESL) Regulations, Biology Guidelines, and the provisions of the MSCP Subarea Plan (SAP) and Vernal Pool Habitat Conservation Plan (VPHCP). Potential impacts on birds covered by the Migratory Bird Treaty Act (MBTA) would be avoided by adherence to the requirements of this law. Further, sensitive species in the MMCP area are concentrated in the MHPA, which is comprised of topography such as canyons, creeks, and steep hillsides. The proposed MMCP designates these areas as Open Space to be preserved from intensive development consistent with the City's MSCP SAP. Through the implementation of the existing regulatory framework, the PEIR identified project and cumulative impacts on sensitive species as less than significant with no mitigation required.

Sensitive Habitats

The PEIR identified that future projects implemented in accordance with the proposed MMCP could potentially have an impact on sensitive upland (Tier I, Tier II, Tier IIIA, and Tier IIIB) and wetland habitat that is present within the MMCP area. Future development under the MMCP would undergo environmental review, including compliance with the City's ESL Regulations prior to disturbance of those lands. Further, sensitive habitat in the MMCP area is concentrated in the MHPA, which is comprised of topography such as canyons, creeks, and steep hillsides. The proposed MMCP designates these areas as Open Space to be preserved from intensive development consistent with the City's MSCP SAP. Through compliance with the established development standards contained in the City's ESL Regulations, Biology Guidelines, VPHCP, MSCP SAP, and MHPA Land Use Adjacency Guidelines, the PEIR identifies project and cumulative impacts on sensitive vegetation communities as less than significant with no mitigation required.

Wetlands

The PEIR identified that future projects implemented in accordance with the proposed MMCP could potentially have an impact on wetlands or other jurisdictional areas that are present within the MMCP area. If impacts on wetlands occur, they would be regulated by the U.S. Army Corps of Engineers in accordance with Section 404 of the Clean Water Act (CWA), the Regional Water Quality Control Board in accordance with Section 401 of the CWA, the CDFW under Section 1600 of the California Fish and Game Code, and the City in accordance with the City's Biology Guidelines, ESL Regulations, VPHCP, and MSCP SAP. Further, wetlands in the MMCP area are concentrated in the MHPA, including canyons, and creeks. The proposed MMCP designates these areas as Open Space to be preserved such that development is sited on the least sensitive area consistent with the City's MSCP SAP. Per the City's ESL Regulations and Biology Guidelines, impacts on wetlands should be avoided, and a wetland buffer is required around all wetlands as appropriate to protect the functions and values of the wetland (City of San Diego 2018). Through the implementation of the existing regulatory framework, the PEIR identifies project and cumulative impacts on wetlands as less than significant with no mitigation required.

Wildlife Movement

The PEIR identified that regional and local wildlife corridors that exist within the MMCP area are surrounded by existing development and are within the Open Space land use designation, which would not be changed by the proposed MMCP. Future development within the MMCP area would undergo an environmental review to determine potential impacts on wildlife corridors, and impacts would be mitigated in accordance with the City's ESL Regulations, Biology Guidelines, and MSCP SAP.

Therefore, the proposed MMCP would not substantially interfere with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, including linkages identified in the MSCP SAP, or impede the use of native wildlife nursery sites. The PEIR identified project and cumulative impacts as less than significant, with no mitigation required.

Habitat Conservation Plan Consistency

The PEIR identified that future development in accordance with the proposed MMCP would be subject to compliance with applicable current and future local, state, and federal policies, guidelines, directives, and regulations, including but not limited to, the state and federal Endangered Species Act, the San Diego County MSCP, the City's ESL Regulations, Biology Guidelines, and the City's MSCP SAP and VPHCP. In addition, the proposed MMCP includes policies aimed at resource protection and preservation of the MHPA. Future development within the MMCP area would be evaluated for compliance with these requirements, and necessary avoidance and mitigation measures would be determined at the project level. Adherence to the above policies, guidelines, directives, and regulations would avoid future significant impacts. Therefore, the proposed MMCP would not result in a conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state habitat conservation plan, either within the MSCP SAP area or in the surrounding region. As a result, the PEIR identified project and cumulative impacts as less than significant, with no mitigation required.

Project

To assess the project's potential biological resource impacts, an Environmentally Sensitive Lands Assessment was completed by Busby Biological Services (August 2021), which can be found in Appendix B to this Addendum.

Sensitive Species

The project is located on a developed site that does not contain any sensitive biological resources, as described in the Environmentally Sensitive Lands Assessment in Appendix B. The project site does not contain any MHPA designated lands and is not adjacent to the MHPA. The site is already developed, and proposed land uses would be consistent with the uses identified in the MMCP for the site. The project would comply with the MBTA described above regarding migratory birds that may have a potential to nest in the project area. As a result, impacts would be less than significant.

Sensitive Habitats

The project is located on a developed site that does not contain any wildlife corridors and is not within or adjacent to the MHPA. The site is developed, and the proposed land uses would be consistent with the uses identified in the MMCP for the site. The project would comply with all relevant regulations mentioned above and no impact would occur.

Wetlands

The project is located on a developed site that does not contain any riparian habitat or sensitive habitat communities. The project would be consistent with the MMCP policies, LDC ESL Regulations, Biology Guidelines, and the MSCP Subarea Plan. No impact would occur.

Wildlife Movement
The project is surrounded by existing development and located on a developed site that does not contain any MHPA-designated lands or is adjacent to the MHPA. The project would be consistent with the MSCP and the designated MMCP land uses and zoning. No impact would occur.

Habitat Conservation Plan Consistency
The project is surrounded by existing development and located on a developed site that does not contain any MHPA-designated lands or is adjacent to the MHPA. The project would be consistent with the MSCP and the designated MMCP land uses and zoning. No impact would occur.

Conclusion

Based on the foregoing analysis and information, there is no evidence that implementation of the project would require a major change to the PEIR relative to Biological Resources. The PEIR concluded that Biological Resource impacts were less than significant and no mitigation was required. Likewise, the project would not result in direct impacts on sensitive wildlife species, sensitive habitats, or City, State, or Federally regulated wetlands. The project would not interfere with wildlife movement or conflict with any habitat conservation plans. The project would not result in a new significant Biological Resource impact nor a substantial increase in the severity of Biological Resource impacts from those described in the PEIR.

Geology/Soils

PEIR

Geology and Soils impacts are evaluated in Section 5.3 of the PEIR.

Seismic Ground Shaking
The PEIR identified that future development activities within the MMCP area would be required to comply with applicable regulatory/industry standard and codes, including the California Building Code (CBC) and SDMC, to reduce potential seismic hazards to an acceptable level of risk. Thus, while the MMCP area would be subject to seismic events, potential hazards associated with ground shaking and seismically induced hazards such as ground failure, liquefaction, landslides, and dam failure would be reduced through implementation of site-specific geotechnical requirements and site design associated with future development within the MMCP area. Additionally, the proposed MMCP would not result in any changes to the Miramar Reservoir dam or otherwise increase the potential for dam failure to occur within the MMCP area. Therefore, the PEIR identifies project and cumulative impacts related to seismic hazards as less than significant, with no mitigation required.

Soil Erosion
The PEIR identified that future development projects implemented within the MMCP area would be required to comply with applicable regulatory/industry standards and codes, including the SDMC (grading requirements), the City's Stormwater Program, and National Pollutant Discharge Elimination System (NPDES) requirements to reduce potential impacts related to erosion and sedimentation hazards to an acceptable level of risk. Therefore, the PEIR identified project and cumulative impacts as less than significant with no mitigation required.

Unstable Geology
The PEIR identified that future development projects implemented within the MMCP area would be required to comply with applicable regulatory/industry standards and codes, including the SDMC and CBC, to reduce potential impacts related to geologic instability to an acceptable level of risk. Potential hazards associated with instability would be addressed by the site-specific recommendations contained within geotechnical investigations as required by the SDMC. Therefore, the PEIR identified project and cumulative impacts as less than significant with no mitigation required.

Project

A Preliminary Geotechnical Investigation was completed by GEOCON Incorporated (July 2022) to assess the project's potential impacts on geological resources and is included as Appendix C to this Addendum.

Seismic Ground Shaking
According to the Preliminary Geotechnical Investigation prepared for the project, the project site is not located within a State of California Earthquake Fault Zone, nor is it underlain by active, potentially active, or inactive faults. Due to the lack of a permanent, near-surface groundwater table and the very dense nature of the underlying formational materials, liquefaction potential for the site is considered very low. Additionally, based on regional mapping and site-specific analysis, the potential for seismically induced landslides or slope instability is not considered a significant concern for the project. The project would also be required to comply with the CBC and SDMC to reduce any potential seismic hazards. Impacts would be less than significant.

Soil Erosion
Construction of the proposed project would involve a variety of heavy equipment associated with intensive earthwork, structural, and paving phases. The project would be required to comply with the City's Storm Water Standards, which require the implementation of BMPs. Grading activities would be required to comply with the City's 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. Impacts would be less than significant.

Unstable Geology
Based on regional mapping and site-specific analysis evaluated in the Preliminary Geotechnical Investigation, the potential for landslides/slope instability, liquefaction or lateral spreading, ground subsidence, or hydrocollapse are not considered a significant concern for the project. The project would not extract underground materials, so impacts related to subsidence would be less than significant. Finally, the project would be required to comply with seismic requirements of the CBC and use proper engineering design and standard construction practices, which are verified at the building permit stage. Impacts would be less than significant.

Conclusion

Based on the foregoing analysis, there is no evidence that implementation of the project would require a major change to the PEIR relative to Geology and Soils. The PEIR concluded that Geology

and Soils impacts were less than significant and no mitigation was required. Likewise, the project would not result in significant risk during seismic ground shaking, exacerbate soil erosion, or take place on unstable geology. The project would not result in any new significant Geology and Soil impacts or a substantial increase in the severity of Geology and Soils impacts from those described in the PEIR.

Greenhouse Gas Emissions

PEIR

Greenhouse Gas Emissions impacts are evaluated in Section 5.4 of the PEIR.

Greenhouse Gas Emissions
The PEIR identified that the proposed MMCP would increase aggregate greenhouse gas (GHG) emissions over those of the adopted Community Plan at buildout; however, this increase in GHG is a direct result of the implementation of Climate Action Plan (CAP) Strategies and the General Plan's "City of Villages" strategy, which focuses growth in certain areas. Increasing residential and commercial density in transit corridors and villages within a TPA would support the City in achieving the regional GHG emissions reduction targets of the CAP, and thus, the PEIR identified project and cumulative impacts associated with GHG emissions as less than significant with no mitigation required.

Greenhouse Gas Reduction Plan Consistency
The PEIR identified that the proposed MMCP would develop compact, walkable Urban Villages close to transit connections and consistent with smart growth principles. The MMCP supports the multimodal strategy of the SANDAG Regional Plan through improvements to increase bicycle, pedestrian, and transit access. Policies and goals contained within the proposed MMCP Land Use, Parks, Recreation, and Open Space, and Economic Prosperity and Mobility sections would serve to promote bus transit use as well as other forms of mobility, including walking and bicycling. The proposed MMCP incorporates goals and policies intended to support the General Plan and CAP policies and thus, the PEIR identified project and cumulative impacts associated with GHG emissions as less than significant with no mitigation required.

Project

HELIX completed a CAP Consistency Checklist (August 2023) for the proposed project in accordance with City requirements at the time this report was being prepared. The CAP Consistency Checklist is attached as Appendix D of this Addendum.

Greenhouse Gas Emissions
The project application was deemed complete when compliance with the CAP Consistency Checklist was the method for determining project-level impacts associated with GHG. Under Step 1 of the CAP Consistency Checklist, the project is consistent with the existing General Plan and MMCP 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 at the project level. This includes project features

consistent with the energy and water efficient buildings strategy, such as cool roofing and low flow plumbing fixtures. The project would also feature electric vehicle and bicycle parking spaces and transit, carpool, and vanpool subsidies to incentive the use of alternative transportation. These project features would be assured as a condition of project approval. 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 greenhouse gases to cumulative emissions would be less than cumulatively considerable. Impacts would be less than significant.

Greenhouse Gas Reduction Plan Consistency
As discussed above, the project demonstrates compliance with the City's CAP. The project does not propose development that would generate GHG emissions that would have a significant impact on the environment. The project is also consistent with the land use designation and zoning, as discussed previously herein. Impacts would be less than significant.

Conclusion

Based on the foregoing analysis and information, there is no evidence that implementation of the project would require a major change to the PEIR relative to GHG Emissions. The PEIR concluded that GHG Emissions impacts were less than significant and no mitigation was required. Likewise, the project would not result in significant greenhouse gas emissions or conflict with any applicable GHG reduction plans. The project would not result in a new significant GHG Emissions impact nor a substantial increase in the severity of GHG Emissions impacts from those described in the PEIR.

Historical Resources

PEIR

Historical, Archaeological, and Tribal Cultural Resources impacts are evaluated in Section 5.5 of the PEIR.

Historic Structures
The PEIR identified that future development and redevelopment under the proposed MMCP could result in the alteration of a historical resource, where implementing the proposed MMCP would result in increased development potential. While the SDMC and policies in the proposed MMCP provide for the regulation and protection of designated and potential historical resources, it is not possible to ensure the successful preservation of all historic built environment resources within the MMCP area. Implementing future projects within the MMCP area could result in an alteration of a historic building, structure, object, or site where an increase in density is proposed beyond the adopted Community Plan or current zoning. The PEIR identified no feasible Mitigation Framework. Thus, the PEIR identified potential project and cumulative impacts on historic buildings, structures, or sites as significant and unavoidable.

Prehistoric or Historic Resources
The PEIR identified that implementation of future projects within the MMCP area could adversely impact prehistoric or historic archaeological resources, including religious or sacred use sites and human remains. While existing regulations, the SDMC and proposed MMCP policies would provide

for the regulation and protection of archaeological resources and human remains and avoid potential impacts, it is not possible to ensure the successful preservation of all archaeological resources where new development may occur. The MMCP would be required to implement PEIR Mitigation Measure HIST-1, which requires future projects to evaluate the potential sensitivity of the future project site; conduct an evaluation report and tribal consultation if resources are likely at the future project site; avoid resources during construction if feasible; produce an archaeological resource management report; and properly handle any resources uncovered during construction. However, even with the implementation of the Mitigation Framework, the protection of archaeological resources during future MMCP project construction cannot be guaranteed. Therefore, the PEIR identifies potential project and cumulative impacts on prehistoric or historic archaeological resources, religious or sacred use sites, and human remains from the implementation of the MMCP as significant and unavoidable.

Tribal Cultural Resources

In July 2022, in accordance with AB 52, project notification letters and the draft Cultural Resources Constraints & Sensitivity Analysis were sent to Ms. Lisa Cumper, Tribal Historic Preservation Officer (THPO) from the Jamul Indian Village; Mr. Clint Linton, Director of Cultural Resources from the Iipay Nation of Santa Ysabel; and Ms. Angelina Gutierrez, Tribal Historic Preservation Monitor from the San Pasqual Band of Mission Indians providing an opportunity to consult on the proposed CPU.

The City received a request for consultation from the Jamul Indian Village. Consultation with Jamul Indian Village was initially conducted on September 16, 2022, which addressed the CPU scope and the proposed mitigation framework in the Draft PEIR, including the specific procedures for project review, tribal consultation, and the proper treatment of Tribal Cultural Resources at the project level. Consultation was considered "on-going" in order to address questions related to the cultural sensitivity map and Draft PEIR mitigation framework. Subsequent consultation with Jamul Indian Village was conducted on October 20, 2022, to provide additional clarifying information regarding the development of the cultural Sensitivity map. Ultimately, no additional requirements or recommendations were requested to be incorporated into the Final PEIR, and consultation was concluded.

Based on consultation, the PEIR identified that the implementation of future projects within the MMCP area could adversely affect tribal cultural resources. While existing regulations, the SDMC, and proposed MMCP policies, including PEIR Mitigation Measure HIST-1 described above, would provide for the regulation and protection of tribal cultural resources, it is not possible to ensure the successful preservation of all tribal cultural resources. Therefore, the PEIR identified potential project and cumulative impacts on tribal cultural resources as significant and unavoidable.

Project

An Archaeological Resources Report Form was completed by HELIX (October 2022) to determine the project's potential impacts on historical resources. The Archaeological Resources Report Form is attached as Appendix E of this Addendum.

Historic Structures

As described in the Archaeological Resources Report Form, no historic resources were identified on

the project site from the South Coastal Information Center records search and field investigation, and the implementation of the project would not cause impacts on historical resources. The existing buildings at the project site were constructed after 1980 and do not qualify as historic structures. Impacts would be less than significant.

Prehistoric or Historic Resources

According to Figure 5.5-2 of the PEIR, the project site is in an area of high cultural resources sensitivity. In accordance with PEIR Mitigation Measure HIST-1, an initial investigation was conducted to determine if cultural resources are present on the project site. A records search conducted with the South Coastal Information Center (SCIC) indicated that 46 previously recorded cultural resources existed within the one-mile search radius, none of which were recorded on the project site. Additionally, no cultural resources were identified during the pedestrian survey of the site completed by a HELIX archaeologist and a Kumeyaay Native American monitor on December 13, 2022. The project site is underlain by previously placed artificial fill overlying Tertiary-age Scripps Formation, which is approximately 50 million years old and would not contain historical or cultural resources (Appendix C). There are no known cultural resources on the project site, and the comprehensive archaeological evaluations and procedures required under PEIR Mitigation Measure HIST-1 would, therefore, not apply to the project. The project site is not within a cemetery or otherwise known to include human remains. Should human remains be uncovered during construction, the project would comply with State Health and Safety Code Section 7050.5 in which a temporary construction exclusion zone to be established surrounding the area of discovery, immediate notification of the San Diego County Coroner's office, and evaluation by a forensic anthropologist. If the remains are determined to be of Native American origin, the Most Likely Descendant, as identified by the Native American Heritage Commission (NAHC), shall be contacted to determine proper treatment and disposition of the remains in accordance with California Public Resources Code section 5097.98. Impacts would be less than significant.

Tribal Cultural Resources

As stated above, the PEIR previously addressed Tribal Cultural Resources through the AB 52 consultation process which ultimately concluded. The consultation required that future projects conduct an initially analysis to determine if there is evidence that the project site could contain archaeological resources.

The project's initial archaeological investigation, including a records search with the SCIC and a pedestrian survey, confirmed that there are no known cultural resources on the project site. In a response dated May 27, 2022, the NAHC indicated that the search of their Sacred Lands File was completed for the project with negative results. A list of tribal contacts from whom additional information can be solicited was provided with the NAHC's response; letters were sent to these contacts on December 7, 2022. To date, no responses have been received. The project site is underlain by previously placed artificial fill overlying Tertiary-age Scripps Formation, which is approximately 50 million years old and would not contain tribal cultural resources (Appendix C). There are no known tribal cultural resources on the project site, and the comprehensive archaeological evaluations and procedures required under PEIR Mitigation Measure HIST-1 would therefore not apply to the project. No impact would occur.

Conclusion

Based on the foregoing analysis and information, there is no evidence that implementation of the project would require a major change to the PEIR relative to Historical Resources. The PEIR identified Mitigation Measure HIST-1. The project completed a project-specific cultural resources survey in accordance with PEIR Mitigation Measure HIST-1 which determined that there are no cultural resources on the project site. The project would not significantly affect historic structures, historic or prehistoric resources, or tribal cultural resources. The project would not result in a new significant Historical Resources impact nor a substantial increase in the severity of Historical Resources impacts from those described in the PEIR. No mitigation measures related to Historical Resources would be required.

Hazards and Hazardous Materials

PEIR

Hazards and Hazardous Materials impacts are evaluated in Section 5.6 of the PEIR.

Wildland Fires
The PEIR identified that future development implemented in accordance with the proposed MMCP would be subject to regulatory requirements related to fire hazards and prevention, including standards associated with vegetative (brush) management, such as selective removal/thinning and planting of fire-resistant plantings to create appropriate buffer zones around development, as well as incorporating applicable fire-related design elements, including fire-resistant building materials, fire/ember/smoke barriers, automatic alarm and sprinkler systems, and provision of adequate water flow for fire protection and emergency access. Therefore, the PEIR identified project and cumulative impacts associated with wildfire hazards as less than significant, with no mitigation required.

Hazardous Substances
The PEIR identified that future development implemented in accordance with the proposed MMCP would be subject to applicable regulatory/industry and code standards and requirements related to health hazards from hazardous materials, including as they relate to proximity to schools. For any new schools that could be constructed within 0.25 miles of a facility that emits hazardous emissions or handles hazardous or acutely hazardous materials, substances, or waste, the school district or private school entities would be responsible for planning, siting, building, and operating the schools. It would be the responsibility of the school district to perform an in-depth analysis of any potential hazards at the project level. Therefore, the PEIR identified project and cumulative impacts on schools from hazardous materials, substances, or waste as less than significant, with no mitigation required.

Emergency Response Plans
The PEIR identified that the implementation of the proposed MMCP would not impair the implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan, including the County's Multi-Jurisdictional Hazard Mitigation Plan and Emergency Operations Plan; therefore, the PEIR identified project and cumulative impacts as less than significant, with no mitigation required.

Hazardous Sites

The PEIR identified that future development implemented in accordance with the proposed MMCP would be required to adhere to applicable regulatory/industry and code standards related to health hazards from hazardous materials. In accordance with City, State, and federal requirements, any new development that involves contaminated property would necessitate the cleanup and/or remediation of the property in accordance with applicable requirements and regulations. This includes obtaining clearance from the applicable regulatory agencies for remediation efforts at applicable locations, including the three listed open cases within and adjacent to the MMCP area. Therefore, the PEIR identified project and cumulative impacts as less than significant with no mitigation required.

Airport Safety

The PEIR identified that future development projects within the MMCP area would be subject to the requirements of the MCAS Miramar Airport Land Use Consistency Plan (ALUCP), including safety compatibility and airspace protection criteria, as well as applicable sections of the SDMC. Through compliance with these requirements and the implementation of the policies that require future projects to be reviewed for compatibility with the safety zones, noise contours, and airspace protection surfaces identified in the applicable ALUCP, potential hazards from airport operations would not expose people or structures to a significant risk of loss, injury, or death, from off-airport aircraft operational accidents. Therefore, the PEIR identified project and cumulative impacts as less than significant, with no mitigation required.

Project

Portions of this analysis draw from the Vehicle Miles Traveled (VMT) Assessment completed by Linscott, Law, and Greenspan (LLG; August 2024), which is included as Appendix F to this Addendum.

Wildland Fires

According to the California Department of Forestry and Fire Protection's (CAL FIRE's) map of VHFHSZ prepared for the City, the majority of the project site and the surrounding area is located within a Local Responsibility Area VHFHSZ (CAL FIRE 2024). However, the implementation of the project would not increase wildland fire risk at the site over existing conditions. The project would replace the existing office uses with R&D uses that are consistent with the site's zoning of IL-2-1 and land use designation of Industrial Employment /Technology Park. The project would install standard fire safety features and all buildings would be constructed in compliance with the fire regulations in the CBC. In addition, the project is completely surrounded by development with the exception of ornamental landscaping on the south side of the project site. Therefore, the project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires. Impacts would be less than significant.

Hazardous Substances

The proposed project is not located within one-quarter mile of an existing or proposed school. Regardless, the project would comply with all applicable regulations regarding hazardous materials and no impact would occur. No impact would occur.

Emergency Response Plans

The project is consistent with the site's land use designation in the MMCP. The project's design and additional trips on the local roadways would not result in interference with emergency response access or evacuation (Appendix F). The proposed project would also implement improvements to the surrounding intersections, which would allow for improved emergency access to the project and the surrounding areas. Impacts would be less than significant.

Hazardous Sites

The Department of Toxic Substances Control (DTSC) EnviroStor database was used to evaluate the project site, and neither the project site nor properties within 1,000 feet are listed within it (DTSC 2024). The State Water Resources Control Board (SWRCB) GeoTracker database was also used to evaluate the project site, and the project site was not listed within it. A cleanup program site was located at 6455 Lusk Boulevard, and the pollutant of concern was waste oil in the soil. However, the case was cleaned and closed in 2003 (SWRCB 2024). Therefore, the project would not create a significant hazard to the public or environment resulting from being included on a list of hazardous materials sites. Impacts would be less than significant.

Airport Safety

The proposed project is located approximately 3.2 miles northwest of the MCAS Miramar Airport. According to the ALUCP for MCAS Miramar, the project site is located within an Air Installations Compatible Use Zone (AICUZ) Safety Zone, specifically the Transition Zone, for MCAS Miramar (San Diego County Regional Airport Authority 2011). Project implementation would not conflict with the Transition Zone designation. According to the MCAS Miramar ALUCP, R&D uses are compatible in the Transition Zone. As such, the project would not result in land uses that are incompatible with an adopted ALUCP. The project would be consistent with the designated MMCP land uses and zoning. Impacts would be less than significant.

Conclusion

Based on the foregoing analysis and information, there is no evidence that implementation of the project would require a major change to the PEIR relative to Hazards and Hazardous Materials. The PEIR concluded that Hazards and Hazardous Materials impacts were less than significant and no mitigation was required. Likewise, the project would not result in an increased risk of wildfire or hazardous accidents. The project would not inhibit emergency response or airport safety or take place on a known hazardous site. The project would not result in a new significant Hazards and Hazardous Materials impact nor a substantial increase in the severity of Hazards and Hazardous Materials impacts from those described in the PEIR.

Hydrology/Water Quality

PEIR

Hydrology and Water Quality impacts are evaluated in Section 5.7 of the PEIR.

Flooding and Drainage Patterns

The PEIR identified that future development projects implemented within the MMCP area would be subject to the requirements of the NPDES, the City's Stormwater Standards Manual, and the SDMC Stormwater Runoff and Drainage Regulations. In addition, the proposed MMCP includes policies that encourage development with sustainable design elements to capture and infiltrate water on-site. Through adherence to the regulatory framework, augmented by the proposed MMCP policies regarding sustainable design features, the PEIR identified project and cumulative impacts related to flooding from surface runoff as less than significant, and no mitigation is required.

Flood Zones

The PEIR identified that future development in accordance with the proposed MMCP would be subject to applicable SDMC and Federal Emergency Management Agency (FEMA) requirements to ensure protection from flooding. Future development projects located within the mapped 100-year floodplain would undergo project-level analysis to determine the effects to base flood elevations and ensure that no flooding, erosion, or sedimentation impacts occur on- or off-site. Thus, the PEIR identified project and cumulative impacts related to flood hazard areas as less than significant, and no mitigation is required.

Pollutants

The PEIR identified that future construction activities associated with the MMCP would be subject to applicable requirements in the General Construction Permit or a Stormwater Pollution Prevention Program/Water Pollution Control Plan, which would address the potential for the transport of pollutants in runoff water during construction activities. Future projects in the MMCP area would also be subject to the requirements in the City's stormwater regulations, Stormwater Standards Manual, Jurisdictional Runoff Management Plan, and Municipal Separate Storm Sewer System Permit, which would require that all future projects meet minimum stormwater requirements to protect water quality. Thus, through compliance with the existing regulatory framework addressing protection of water quality, the PEIR identified project and cumulative impacts related to water quality as less than significant, and no mitigation is required.

Groundwater

The PEIR identified that current stormwater regulations, which encourage the infiltration of stormwater runoff and the protection of water quality, would allow for groundwater recharge and would protect the quality of groundwater resources. As such, it is not anticipated that the proposed MMCP would deplete groundwater supplies, degrade groundwater quality, or interfere with groundwater recharge. Thus, the PEIR identified project and cumulative impacts related to groundwater as less than significant, and no mitigation is required.

Project

A Stormwater Management Investigation was completed for the project by GEOCON Incorporated (July 2022) and is included as Appendix G to this Addendum.

Flooding and Drainage Patterns

The project involves the replacement of a commercial and office park with R&D uses. A Stormwater Pollution Prevention Plan (SWPPP) would be prepared in compliance with the Construction General Permit. The SWPPP would identify erosion control and sediment control BMPs that would be

implemented to minimize the occurrence of soil erosion. The project would additionally comply with the regulations stated above. Impacts would be less than significant.

Flood Zones
The project is not within the mapped 100-year floodplain (FEMA 2025), nor does it propose housing. No impact would occur.

Pollutants
Through the incorporation of liners, subdrains, BMPs, and low impact development design practices, the project would not result in significant runoff, as stated in the project's Stormwater Management Investigation. A SWPPP would be prepared in compliance with the Construction General Permit, which would identify erosion control and sediment control BMPs that would be implemented to minimize the occurrence of soil erosion. A Stormwater Quality Management Plan would be prepared for the project which includes construction and post-construction BMPs such as source control and hydromodification designs, which would prevent pollutant discharge to receiving waters. Impacts would be less than significant.

Groundwater
There is no groundwater extraction occurring or planned at the project site; therefore, there would be no disruption to any existing groundwater levels or well production. In relation to impervious surfaces that could interfere with groundwater recharge, the project would occur generally within the footprint of the existing developed portion of the site. Impacts would be less than significant.

Conclusion

Based on the foregoing analysis and information, there is no evidence that implementation of the project would require a major change to the PEIR relative to Hydrology/Water Quality. The PEIR concluded that Hydrology/Water Quality impacts were less than significant and no mitigation was required. Likewise, the project would not exacerbate flooding risk or negatively impact water quality. The project would not result in a new significant Hydrology and Water Quality impact nor a substantial increase in the severity of Hydrology and Water Quality impacts from those described in the PEIR.

Land Use

PEIR

Land Use impacts are evaluated in Section 5.8 of the PEIR.

Land Use Plan Consistency
The PEIR identified that the proposed MMCP would serve to implement General Plan policies at a local level, specific to the community character and needs, and is generally consistent with the goals and policies of each element of the General Plan. Additionally, the MMCP is consistent with the applicable land use planning documents that address land use, resource management, and development in the Mira Mesa community. Development that implements the proposed MMCP would be required to comply with the Historical Resources Regulations. The amendment to the Historical Resources Guidelines included with the MMCP that will add Tier 2 and Tier 3 communities

to the list of areas exempted from review of structures 45 years old or older is supported by the findings of the Focused Reconnaissance Survey and is permitted by Section 143.0212 of the Historical Resources Regulations and the Historical Resources Guidelines. Thus, the implementation of the MMCP would not conflict with the City's Historical Resources Regulations. As such, the MMCP would result in less-than-significant environmental impacts related to conflicts with applicable planning documents. Thus, the PEIR identified project and cumulative impacts as less than significant, with no mitigation required.

Habitat Conservation Plan Consistency

The PEIR identified that the majority of open space in the Community Plan area is within the MHPA area. The proposed MMCP would incorporate the goals of resource protection outlined in the MSCP Subarea Plan and the VPHCP. In addition, the MMCP would facilitate future development, which would be required to comply with the MHPA Land Use Adjacency Guidelines to prevent conflict with preservation of the MHPA. The PEIR identified project and cumulative impacts as less than significant with no mitigation required.

Airport Land Use Compatibility Plans

The PEIR identified that the entirety of the MMCP area is within either Airport Influence Area (AIA) Review Area 1 or Review Area 2 for MCAS Miramar. Future development associated with the proposed MMCP would be required to comply with all requirements of the Airport Land Use Compatibility Overlay Zone and would be reviewed by the City and/or the Airport Land Use Commission (ALUC) for consistency with the ALUCP requirements on a project-by-project basis. Compliance with land use compatibility regulations would ensure the MMCP would not conflict with an adopted ALUCP, and the PEIR identified project and cumulative impacts as less than significant with no mitigation required.

Divide an Established Community

The PEIR identified that the proposed MMCP would encourage future physical development to occur in mixed-use Urban Villages centered around existing development areas. The MMCP would be consistent with the existing development pattern by maintaining residential neighborhoods and industrial areas, while facilitating connectivity of employment opportunities, commercial centers along major thoroughfares, and residential or mixed-use neighborhoods. As such, the MMCP would not physically divide a community, and the PEIR identified project and cumulative impacts as less than significant with no mitigation required.

Project

Land Use Plan Consistency

The project site is within the MMCP area, and the project application was deemed complete prior to adoption of the updated MMCP. The parcels have a City General Plan land use designation of Industrial Employment. The project site was designated Industrial Park in the prior MMCP and is designated Technology Park in the updated MMCP; both designations allow for similar research and development and light industrial uses consistent with the proposed project uses. The new Technology Park land use designation allows high technology uses related to applied sciences, including R&D consistent with the proposed project. Both the prior and current MMCP authorized the same density of development on the project site, and the IL-2-1 zoning remains unchanged. Implementation of the proposed project would not cause significant environmental impact due to a

conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. No impact would occur.

Habitat Conservation Plan Consistency
The project site is not within or adjacent to the MHPA. As a result, the project would not be inconsistent with or conflict with the MSCP Subarea Plan. No impact would occur.

Airport Land Use Compatibility Plans
The project is located approximately 3.4 miles northwest of the MCAS Miramar Airport. According to the ALUCP for MCAS Miramar, the project site is located within an AICUZ Safety Zone, specifically Transition Zone, for MCAS Miramar (San Diego County Regional Airport Authority 2011). However, project implementation would not conflict with the Transition Zone designation. According to the MCAS Miramar ALUCP, R&D uses are compatible in Transition Zone. Impacts would be less than significant.

Divide an Established Community
The project involves the redevelopment of a commercial and office park with R&D uses consistent with the MMCP land uses. No impact would occur.

Conclusion

Based on the foregoing analysis and information, there is no evidence that implementation of the project would require a major change to the PEIR relative to Land Use. The PEIR concluded that Land Use impacts were less than significant and no mitigation was required. Likewise, the project would be consistent with relevant land use plans and would not divide an established community. The project would not result in a new significant Land Use impact nor a substantial increase in the severity of Land Use impacts from those described in the PEIR.

Noise

PEIR

Noise impacts are evaluated in Section 5.9 of the PEIR.

Ambient Noise Level
The PEIR identified that the primary source of noise in the MMCP area is traffic. Implementation of the proposed MMCP would introduce new land uses that would generate traffic that would result in substantial noise generation. No feasible Mitigation Framework exists for the increase in traffic noise generated by the MMCP. Because the implementation of the MMCP would result in a substantial increase in ambient noise due to traffic and noise sensitive land uses (NSLUs) could be exposed to vehicular traffic noise levels in excess of the City's Land Use–Noise Compatibility Guidelines, the PEIR identified project and cumulative impacts as significant and unavoidable. Ambient noise level impacts associated with non-traffic generated noise are addressed under Municipal Code Compatibility below.

Traffic Noise
Refer to the Ambient Noise Level discussion above.

Airport Land Use Compatibility

The PEIR found that noise sensitive land uses, including new residential, as well as urban employment village and business park, and other land use designations that allow for residential uses are proposed within the 60 CNEL contours associated with MCAS Miramar. The PEIR identified that although the General Plan Noise Element has an exterior noise compatibility level of 60 CNEL or less for residential uses, noise levels up to 70 CNEL for multifamily residential are considered conditionally compatible, as long as interior noise levels can be attenuated to 45 CNEL or less. The PEIR found that new residential development may be exposed to exterior noise levels from aircraft associated with MCAS Miramar that exceed the Land Use – Noise Compatibility Guidelines. No feasible Mitigation Framework exists to reduce the exposure of sensitive receptors to aircraft noise. Therefore, the PEIR identified project and cumulative impacts as significant and unavoidable for noise sensitive land uses, including residential land uses.

Municipal Code Compatibility

The PEIR identified that the City regulates specific noise level limits allowable between land uses, including the requirement for noise studies, limits on hours of operation for various noise-generating activities, and standards for the compatibility of various land uses with the existing and future noise environment. Through enforcement of the Noise Abatement and Control Ordinance, the PEIR identified project and cumulative impacts as less than significant with no mitigation required.

Construction Noise

The PEIR identified that construction noise attributed to future projects in the MMCP area would be regulated by the SDMC, and construction noise impacts due to the implementation of the MMCP would be determined by a specific future project's compliance with the limits specified in the SDMC. Future infill projects, such as those allowed under the proposed MMCP, may be located in close proximity to existing and future NSLUs. Construction activities related to the implementation of the MMCP could potentially generate short-term noise levels in excess of 75 A-weighted decibel energy equivalent level (12-hour) at adjacent properties. Future projects in the MMCP area would be required to implement PEIR Mitigation Measure NOI-1, which requires construction contractors to implement measures, such as noise attenuation techniques and construction notices to nearby sensitive receptors, to minimize construction noise. However, the ability for future projects to conform to the noise ordinance cannot be determined at the programmatic level. Noise impacts from construction activities are therefore identified as significant and unavoidable in the PEIR. Cumulative impacts, however, would be less than significant because construction activities would be temporary and short-term in nature and would not combine with construction activities around the MMCP area to result in a cumulatively considerable impact.

Groundborne Noise and Vibration

New development in the MMCP area could include future construction activities that would use vibratory construction equipment and could expose future sensitive receptors to substantial vibration levels. The MMCP would be required to implement PEIR Mitigation Measure NOI-2, which requires vibration reduction measures to minimize construction-related vibration impacts. However, the ability for future projects in the MMCP area to conform to the vibration ordinance cannot be determined at the programmatic level. The PEIR identified impacts due to groundborne vibration as significant and unavoidable. Cumulative impacts, however, would be less than significant because

construction activities would be temporary and short-term in nature and would not combine with construction activities around the MMCP area to result in a cumulatively considerable impact.

Project

A Noise Technical Report was completed for the project by HELIX (December 2023) to assess the project's potential noise impacts. The Noise Technical Report is attached as Appendix H to this Addendum.

Ambient Noise Level

As stated in the project's Noise Technical Report, the addition of project-generated traffic would not result in a perceptible change in traffic noise levels. The project proposes uses consistent with the MMCP and zoning. Considering the scope of the project and distance from residential uses, the project would not cause noise impacts related to collocation. The project would comply with City's Noise Abatement and Control Ordinance, and noise impacts would be less than significant.

Traffic Noise

Refer to the Ambient Noise Level discussion above. Traffic noise impacts would be less than significant.

Airport Land Use Compatibility

The adopted ALUCP for MCAS Miramar specifies that noise levels of up to 70 dB CNEL are compatible with R&D land uses, and noise levels between 70 and 80 dB CNEL are conditionally compatible provided interior noise levels do not exceed 50 dB CNEL. The project site is located within the 60-65 dB CNEL contour for MCAS Miramar, does not propose noise sensitive land uses, and would not be subject to incompatible noise levels from aircraft noise, as defined by the ALUCP for R&D land uses (San Diego County Airport Land Use Commission 2011). Impacts would be less than significant.

Municipal Code Compatibility

Operation of the project would include features such as heating, ventilation, and air conditioning (HVAC) systems and on-site generators that could create noise levels from stationary sources that would exceed property line limits. HVAC noise would be controlled in accordance with the property line limits established by the Noise Abatement and Control Ordinance, and the project proposes barriers around generators to minimize operational noise during non-emergency generator testing and maintenance (Figure 4, *Generator Barriers)*. Impacts would be less than significant.

Construction Noise

The Noise Technical Report prepared for the project found potential impacts associated with on-site construction equipment and recommended a construction noise management plan be prepared consistent with the requirements of PEIR Mitigation Measure NOI-1. With implementation of PEIR Mitigation Measure NOI-1, impacts at the project level will be reduced to less than significant. Construction activities would be temporary and short-term in nature and would not combine with construction activities around the MMCP area, so cumulative impacts would be less than significant without mitigation. Impacts would be less than significant with PEIR Mitigation Measure NOI-1 as detailed in the project-specific Mitigation Monitoring and Reporting Program outlined in Section VIII of this Addendum below.

Groundborne Noise and Vibration

Off-site exposure to ground-borne vibration would be temporary as it would be limited to the short-term construction period. Therefore, even though vibration may be perceptible, temporary impacts associated with the roller (and other potential equipment) would be less than significant and implementation of PEIR Mitigation Measure NOI-2 is not required. As a R&D land use, the project would not generate excessive ground-borne vibration during operations. Impacts would be less than significant.

Conclusion

Based on the foregoing analysis and information, there is no evidence that implementation of the project would require a major change to the PEIR relative to Noise. The PEIR identified Mitigation Measures NOI-1 and NOI-2 but determined noise impacts to be significant and unavoidable. The project would comply with the required noise-reduction measures in NOI-1 through preparation of a construction noise management plan. The project would not substantially increase ambient or traffic noise levels or conflict with noise regulations. Project vibration impacts would be minor and temporary, and PEIR Mitigation Measure NOI-2 would not apply. The project would not result in a new significant Noise impact nor a substantial increase in the severity of Noise impacts from those described in the PEIR. No new mitigation measures related to Noise would be required.

Public Services and Facilities

PEIR

Public Services and Facilities impacts are evaluated in Section 5.10 of the PEIR.

New Public Facilities

The PEIR identified that the implementation of the proposed MMCP would not result directly in the construction of new or expanded facilities; however, future facilities that are proposed in the MMCP, as well as the MMCP's policy framework and supplemental development regulations (SDRs), which support the expansion of public services and facilities in order to adequately serve the growing population in the community, would facilitate the future construction of new or expanded police stations, fire stations, libraries, schools, and parks and recreational facilities. Buildout of the proposed MMCP would result in population growth which could increase demand on existing facilities and necessitate the construction of new or expanded facilities in order to maintain public services at the desired performance standards. Environmental review would occur at the time of future project review and approval for each future facility. 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, and, as such, no feasible Mitigation Framework exists. 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, the PEIR identified project and cumulative impacts as significant and unavoidable.

Recreational Demand

The PEIR identified that the proposed MMCP would result in a buildout of approximately 58,741 dwelling units and a population of approximately 143,000 residents by 2050. In order to maintain

the Value Standard established by the City for parks and recreational facilities, the community of Mira Mesa would be required to provide park facilities totaling 14,300 Recreational Value Points upon buildout under the proposed MMCP. The existing and planned park facilities at this time total 11,196 Recreational Value Points, leaving a deficit of recreational facilities. Due to the increase in population and the existing deficit of appropriate recreational facilities, it is possible the increased use of the facilities could result in substantial physical deterioration. The proposed MMCP contains policies and SDRs that support the maintenance of existing facilities, as well as the provision of new facilities as the community grows, which would serve to reduce the impact; however, it is unknown to what extent these potential future facilities would be able to accommodate increases in demand for recreational facilities, and no feasible Mitigation Framework exists. Thus, the PEIR identified project and cumulative impacts as significant and unavoidable.

Expanded Recreational Facilities

The PEIR identified that the implementation of the proposed MMCP would result in a deficit of population-based recreation facilities. While the proposed MMCP contains policies and SDRs that would support and require the development of future park/recreational facilities and includes planned park facilities in the community, the proposed MMCP would not directly result in the construction of these planned facilities. Nonetheless, the proposed MMCP's policies and SDRs would facilitate the future development of parks and recreational facilities, the construction of which could result in physical environmental impacts. While these impacts would be assessed during project-level environmental review, it cannot be ensured the impacts would be less than significant, and no feasible Mitigation Framework exists. Therefore, the PEIR identified project and cumulative impacts as significant and unavoidable.

Project

New Public Facilities

The proposed project would not change the existing demand for police or fire protection services because the operation of the project would not result in a substantial increase in employees or population. The project would replace the existing office uses with R&D uses and supporting amenities that are consistent with the site's zoning of IL-2-1 and land use designation of Industrial Employment /Technology Park. Therefore, the project would not substantially increase the need for new police or fire department staff or facilities. Additionally, the project would not introduce inhabitants to the project area which would require additional schools, parks, or other recreational facilities. Impacts would be less than significant.

Recreational Demand

The proposed project involves the replacement of existing office uses with R&D uses and supporting amenities. The project would not introduce inhabitants or visitors that would use existing recreational facilities or create the need for new facilities. The proposed project would not result in physical deterioration of an existing open space area or any recreation facilities. Impacts would be less than significant.

Expanded Recreational Facilities

The proposed project does not involve or require the construction or expansion of recreational facilities, and no impact will occur. No impact would occur.

Conclusion

Based on the foregoing analysis and information, there is no evidence that implementation of the project would require a major change to the PEIR relative to Public Services and Facilities. The PEIR concluded that Public Services and Facilities Impacts would be significant and unavoidable and no mitigation was identified. The project would not substantially increase the demand of public facilities, including park and recreational facilities. The project would not result in a new significant Public Services and Facilities impacts nor a substantial increase in the severity of Public Services and Facilities impacts from those described in the PEIR.

Public Utilities

PEIR

Public Utilities impacts are evaluated in Section 5.11 of the PEIR.

Water Supply

The PEIR identified that according to the water supply assessment, which utilized the City's Urban Water Management Plan based upon SANDAG's Series 14 Forecast land use, there is sufficient water supply to serve the proposed MMCP's estimated annual usage of 1,149 acre-feet per year and future water demands within the Public Utilities Department's (PUD's) service area in normal, single-dry year, and multiple-dry year forecasts. Therefore, the PEIR identified project and cumulative impacts as less than significant with no mitigation required.

New Facilities

Stormwater Infrastructure

The PEIR identified that systematic improvements and replacement of the public stormwater facilities throughout the MMCP area are expected to take place as needed due to aging and substandard infrastructure. Upgrades such as increasing capacity and replacement of existing stormwater pipelines are an ongoing process performed by the City's Stormwater Department under its Municipal Waterways Maintenance Plan. The proposed MMCP also includes policy 6.15 which calls for improvements to existing storm drain outfalls and drain discharge systems. Future stormwater improvement projects, as well as future development projects proposed within the MMCP area, would be reviewed by the City to identify and determine any significant adverse effects to the City's stormwater system, as well as any significant environmental impacts associated with the installation of new stormwater infrastructure. Given the programmatic nature of the proposed MMCP, and the lack of site-specific information regarding potential new stormwater infrastructure at this time, no feasible Mitigation Framework exists. The PEIR identified project and cumulative impacts as significant and unavoidable.

Sewer Infrastructure

The PEIR identified that systematic improvements to sewer facilities throughout the MMCP area are expected to be provided as gradual replacement of aging and substandard infrastructure is needed. Upgrades such as increasing the capacity and replacement of existing sewer pipelines and mains are

an ongoing process. Upgrades to sewer infrastructure are administered by the City's PUD and are handled on a project-by-project basis. Future development projects proposed within the MMCP area would be reviewed by the City to identify and determine any significant adverse effects to the City's sewer facilities, as well as any significant environmental impacts associated with the installation of new sewer facilities. Given the programmatic nature of the proposed MMCP and the lack of site-specific information regarding improvements to existing sewer infrastructure and potential new sewer facilities, no feasible Mitigation Framework exists. The PEIR identified project and cumulative impacts as significant and unavoidable.

Water Infrastructure

The PEIR identified that systematic improvements to water facilities throughout the MMCP area are expected to be provided as gradual replacement of aging and substandard infrastructure is needed. Upgrades such as increasing the capacity and replacement of existing water pipelines and mains are an ongoing process. Upgrades to water infrastructure are administered by the City's PUD and are handled on a project-by-project basis. Future development projects proposed within the MMCP area would be reviewed by the City to identify and determine any significant adverse effects to the City's water distribution system, as well as any significant environmental impacts associated with the installation of new water infrastructure. Nevertheless, given the lack of site-specific information regarding potential new water facilities, no feasible Mitigation Framework exists. The PEIR identified project and cumulative impacts as significant and unavoidable.

Communication Systems

The PEIR identified that no specific communications systems improvements are proposed as part of the MMCP; however, certain policies may encourage the future development of communications infrastructure, such as proposed MMCP Policies 3.42 and 3.43 which direct the City to facilitate the implementation of Intelligent Transportation Systems and emerging technologies, and Policy 4.6 which directs the City to work with utility providers to accelerate the undergrounding of overhead communication lines and electrical distribution lines within residential neighborhoods. As individual development projects are initiated under the proposed MMCP, coordination with communications utility providers would occur as part of the project design and review process to identify any needed improvements to communication facilities. Future communications systems infrastructure would undergo a project-level review by the City to determine any significant environmental impacts associated with the installation of this infrastructure. Nevertheless, given the lack of site-specific information regarding potential new communications systems infrastructure, no feasible Mitigation Framework exists. The PEIR identified project and cumulative impacts as significant and unavoidable.

Solid Waste

The PEIR identified that it is anticipated that the implementation of the proposed MMCP would increase the solid waste management needs within the MMCP area due to increased population and development. The proposed MMCP would provide more concentrated land uses within portions of the MMCP area which would result in an increase in solid waste generated. When land uses are more concentrated, per-unit environmental impacts associated with solid waste management, such as collection truck miles per ton collected, are reduced. Greater efficiencies and expanded opportunities for the recycling of marginally marketable items becomes more feasible. Future development projects implemented within the MMCP area would be required to comply with the

solid waste regulations of the SDMC. In addition, any future discretionary development exceeding the City's 60-ton solid waste threshold must prepare a waste management plan targeting a 75 percent waste reduction. Implementation of WMPs at the project level would ensure consistency with Assembly Bill 341 and the City's CAP. Therefore, the PEIR identified project and cumulative impacts on solid waste management from the implementation of the proposed MMCP as less than significant, with no mitigation required.

Project

HELIX prepared a Waste Management Plan (April 2024) which is included as Appendix I to this Addendum.

Water Supply
The project would be consistent with the existing land use and zoning designations for the project site, and, therefore, would be consistent with existing water demand projections contained in the PEIR's water supply assessment. Therefore, the project would not use excessive amounts of water beyond projected available supplies. Impacts would be less than significant.

New Facilities
The project involves the replacement of the existing office uses with R&D uses, consistent with the project's existing zoning of IL-2-1 and land use designation of Industrial Employment / Technology Park. The project site is currently served by existing underground water, stormwater, and sewer lines located within the adjacent streets. Infrastructure improvements would be limited to connections with these underground utility lines located within the adjacent streets, and no off-site improvements are required to serve the project. Impacts would be less than significant.

Solid Waste
As stated in the project's Waste Management Plan, the project would exceed the Construction & Demolition diversion threshold of 75 percent in Assembly Bill 341. The project would comply with the City Recycling Ordinance and the SDMC. Impacts would be less than significant.

Conclusion

Based on the foregoing analysis and information, there is no evidence that implementation of the project would require a major change to the PEIR relative to Public Utilities. The PEIR concluded that the expansion of public utilities would have a significant and unavoidable impact and no mitigation was identified. The project would not substantially increase the demand of public utilities, including water and sewer facilities. The project would not result in a new significant Public Utilities impact nor a substantial increase in the severity of Public Utilities impacts from those described in the PEIR.

Transportation/Circulation

PEIR

Transportation impacts are evaluated in Section 5.12 of the PEIR.

Transportation Policy Compliance

Pedestrian Facilities

The PEIR identified that the proposed MMCP would be consistent with and would implement the General Plan's safety and accessibility, connectivity, and walkability policies. Pedestrian-focused policies contained in the proposed MMCP include enhancements to pedestrian travel within the MMCP area, such as implementing the multi-use urban pathway system, constructing sidewalk and intersection improvements, and installing missing sidewalks and curb ramps. In addition, the impact fee study for the MMCP would include planned pedestrian improvements to install curb ramps, sidewalks, and audible pedestrian signals to meet Americans with Disability Act standards. Implementation of the MMCP would not restrict or impede pedestrian connectivity and would not conflict with any adopted policies or plans addressing pedestrian facilities. Thus, the PEIR identified project and cumulative impacts as less than significant, with no mitigation required.

Bicycle Facilities

The PEIR identified that the proposed MMCP includes facilities that build on those identified in the San Diego Regional Bicycle Plan and City of San Diego Bicycle Master Plan, while also identifying new recommendations and improving upon existing facilities through an emphasis on protected facilities such as multi-use paths and cycle tracks. Bicycle-focused policies contained in the proposed MMCP are consistent with current Regional and City plans that include providing and supporting a continuous network of safe, convenient, and attractive bicycle facilities throughout the community, and enhancing safety, comfort, and accessibility for all levels of bicycle riders. The MMCP supports improvements such as wayfinding marking, bicycle signals, buffered bicycle lanes, and protected bicycle facilities. Implementation of the proposed MMCP would not restrict or impede bicycle connectivity and would not conflict with any adopted policies or plans addressing bicycle facilities. Thus, the PEIR identified project and cumulative impacts as less than significant, with no mitigation required.

Transit Facilities

The PEIR identified that the General Plan includes policies for supporting the provision of higher-frequency transit services and implementing transit priority measures to help bypass congested areas. Transit-focused policies contained in the proposed MMCP support the implementation of the transit improvements identified in the Regional Plan by prioritizing the transit system and improving the efficiency of transit services. The MMCP includes the implementation of transit priority signals on key transit corridors and roadway right-of-way specifically for high-quality transit facilities. In addition, the MMCP provides for a complete bicycle and pedestrian network connecting with and improving access to transit. Thus, the implementation of the proposed MMCP would not interfere with the implementation of planned transit improvements and would provide policy support for their implementation. The PEIR identified project and cumulative impacts related to conflicts with plans or policies addressing existing or planned transit facilities as less than significant, with no mitigation required.

Roadway Facilities

The PEIR identified that the proposed MMCP would support goals and policies included in the General Plan, to provide a balanced, multimodal transportation network where each travel mode

can contribute to an efficient network of services meeting varied user needs. The General Plan advocates for interconnected street networks within and between communities, and the MMCP would support this effort by creating a walkable and bicycle-friendly environment and supporting transit as a primary mode of travel for many users. Roadway improvements include but are not limited to, repurposing vehicle travel lanes to provide protected bicycle facilities and flexible lanes for SMART corridors, signal operational improvements for corridor management, reserving right-of-way to implement multi-use paths, and providing bicycle and pedestrian signal enhancements to improve safety. Implementation of the proposed MMCP would not conflict with any adopted policies or plans addressing roadway facilities. Thus, the PEIR identified project and cumulative impacts as less than significant, with no mitigation required.

Design Hazards

The PEIR identified that the design of roadways in the MMCP area would be required to conform with applicable Federal, State, and City design criteria, which contain provisions to minimize roadway hazards. Compliance with these standards and design to the satisfaction of the City of San Diego's City Engineer would avoid roadway hazards. As further described in the PEIR, the proposed MMCP project would provide higher quality bicycle facilities and improving pedestrian connectivity with the closure of facility gaps. These multimodal enhancements are intended to improve safety for bicycles and pedestrians on the roadway. The PEIR identified project and cumulative impacts as less than significant, with no mitigation required.

The PEIR analyzed residential, employment, and retail land use VMT. The residential and retail analyses are not applicable to the proposed project. For employment land uses, the PEIR identified that the average VMT per employee for Mira Mesa is greater than the 85% threshold under the Base Year (2012) conditions. The VMT per employee for the Mira Mesa community is 120.2% of the Base Year (2012) regional average.

By Horizon Year 2050, with the implementation of the proposed MMCP, the VMT efficiency of Mira Mesa would be expected to substantially improve. In Year 2050, the VMT per employee for the Mira Mesa community improves to 92.4% of the Base Year (2012) regional average. However, the employment land use would exceed the 85% threshold, and therefore, the VMT transportation impacts related to employment uses in the MMCP are considered significant. No feasible Mitigation Framework exists to reduce the MMCP's employee VMT impacts. Overall, the proposed MMCP's horizon year lower VMT/employee compared to the 2012 Base Year is largely because the proposed MMCP was designed to self-mitigate by increasing the transportation efficiency in the community guided by the General Plan and Climate Action Plan. The proposed MMCP is also consistent with the City of San Diego's Complete Communities: Mobility Choices ordinance, which includes planning strategies that work together to create incentives to build homes near transit, provide more mobility choices, enhance opportunities for places to walk, bike, relax and play, and more quickly bring neighborhood benefits where needed the most. As a result, the MMCP improves not only the community's VMT efficiencies, but also the citywide VMT/employee efficiency. Nevertheless, the PEIR identified project and cumulative impacts as significant and unavoidable.

Emergency Access

The PEIR identified that a Traffic Control Plan/Permit would be implemented on a future project-by-project basis for any lane closures in the public right-of-way or driveway closures, which would ensure access at all times, including emergency service providers. Site design of future development

would be subject to the emergency access requirements of the City's Fire Code and review by the San Diego Fire-Rescue Department to ensure adequate emergency access during operation of any given project. Additionally, the proposed MMCP aims to improve circulation and mobility throughout the MMCP area. This includes the development and implementation of a comprehensive Intelligent Transportation System, which would help better manage and improve the local transportation system, including incident and emergency response. Therefore, the MMCP would not create significant impediments for emergency access, and the PEIR identified project and cumulative impacts as less than significant with no mitigation required.

Project

A Local Mobility Analysis (LMA) and VMT Assessment were completed for the project by LLG (September 2024) and are included as Appendices F and J, respectively, to this Addendum.

Transportation Policy Compliance

The project involves the replacement of existing office uses with R&D uses that would be consistent with the land use designation of Industrial Employment/ Technology Park and zoning of IL-2-1. The project is estimated to generate approximately 10,266 average daily trips (ADT) with 1,643 AM (1,479 in and 164 out) peak hour trips and 1,438 PM (144 in and 1,294 out) peak hour trips. The existing land use generates 1,080 ADT with 64 AM (60 in and 4 out) peak hour trips and 98 PM (27 in and 71 out) peak hour trips. Therefore, the project would result in a net increase of 9,186 ADT with 1,579 AM (1,419 in and 160 out) peak hour trips and 1,340 PM (117 in and 1,223 out) peak hour trips during operation (Appendix F). The project proposes to implement pedestrian, bicycle, transit, and roadway improvements, which are described below. These improvements would ensure the project does not conflict with an adopted program, plan, ordinance, or policy addressing the transportation system, including transit, roadways, bicycle, and pedestrian facilities. Impacts would be less than significant.

Pedestrian Facilities

The project would include a variety of pedestrian improvements as described in the LMA prepared for the project (Appendix J), including an 8-foot (ft) wide non-contiguous sidewalk and a 14-ft landscape buffer along the project frontage on the south side of Lusk Boulevard. The project also includes pedestrian connections within the site consisting of walkways, paths, and sidewalks to facilitate pedestrian circulation. Additionally, as a part of the Systemic Safety Review, several off-site pedestrian improvements, such as crosswalks and countdown timers would also be provided at the following intersections:

- The project will install a high-visibility crosswalk at the following intersections:
  - Lusk Boulevard / Wateridge Circle (south leg)
  - Lusk Boulevard / Pacific Center Boulevard / Project Driveway #3 (north leg)
- The project will install pedestrian countdown timers at the following intersections for all legs with pedestrian crossings:
  - Lusk Boulevard / Wateridge Circle
  - Lusk Boulevard / Pacific Center Boulevard / Project Driveway #3
  - Barnes Canyon Road / Lusk Boulevard
- The project will implement lead pedestrian intervals at the following intersections:

- Barnes Canyon Road / Lusk Boulevard
- Mira Mesa Boulevard / Lusk Boulevard / Oberlin Drive

Bicycle Facilities

As described in the LMA prepared for the project, the project would stripe buffered Class II bicycle lanes on the south side of Lusk Boulevard along the project frontage. Two bicycle repair stations and five bicycle charging stations are also proposed. Additionally, as a part of the Systemic Safety Review, the project would install bicycle loop detectors at the following intersections:

- The project will install bicycle loop detectors at the following intersections:
  - Lusk Boulevard / Wateridge Circle (south leg)
  - Lusk Boulevard / Pacific Center Boulevard / Project Driveway #3 (north leg)
  - Barnes Canyon Road / Lusk Boulevard (east, west, and north legs)
  - Barnes Canyon Road / Pacific Heights Boulevard (all legs)

Transit Facilities

To incentivize employees to use transit, the project would offer discounts to be used at on-site amenities of $30 a month to all transit riders redeemable after the first month of transit use.

Roadway Facilities

As described in the LMA prepared for the project, the project would construct improvements to the following intersections:

- Lusk Boulevard/Pacific Center Boulevard/Project Driveway #3:
  - Restripe the westbound approach to provide an additional (second) westbound left-turn lane.
  - Widen the northbound (Project) approach to provide an exclusive left-turn lane, a shared left/through/right-turn lane, and an exclusive right-turn lane.
- Barnes Canyon Road/Lusk Boulevard: Restripe the eastbound approach to provide an additional (second) eastbound left-turn lane.
- Mira Mesa Boulevard/Scranton Road: Provide right-turn overlap phasing for the eastbound right-turn movement.

The project would also construct improvements to the following segments:

- Lusk Boulevard along the project frontage: As a part of implementing the ultimate classification of Lusk Boulevard as a 4-lane Major Arterial, the Project will provide half-width improvements to include a raised median, a Class II buffered bike lane, and a 22 ft parkway consisting of an 8-ft wide non-contiguous sidewalk and a 14-ft landscape buffer along the Project frontage on the south side of Lusk Boulevard.
- Barnes Canyon Road between Scranton Road and Lusk Boulevard: The ultimate classification of Barnes Canyon Road is a 4-lane Collector. Since the Project applicant owns properties (10070 to 10180 Barnes Canyon Road; 10225 Barnes Canyon Road) along this street segment, the applicant proposes to provide improvements to a 3-lane Collector to include a

Class II buffered bike lane and a 14 ft parkway along Longfellow's property frontage on both the north and south side of Barnes Canyon Road.

- As such, the proposed project and the associated impacts were addressed in the PEIR analysis. No project-specific significant effects that are peculiar to the project or its site would occur. No additional analysis is necessary.

Design Hazards

There would be no hazardous design features or incompatible uses introduced as a result of the project; the proposed R&D uses would be compatible with the site's land use designation and zoning. The project's paved internal roadways would not include sharp curves. Impacts would be less than significant.

VMT

The proposed project is in a census tract with a VMT per Employee of 25.6, which is approximately 135.5% of the regional average of 18.9. Compliance with the City's Complete Communities: Mobility Choices program would reduce VMT impacts to the extent feasible. The *Complete Communities: Housing Solutions and Mobility Choices Program PEIR* was prepared pursuant to Section 15168 of the CEQA Guidelines and is incorporated by reference pursuant to Section 15152 of the CEQA Guidelines. The *Complete Communities: Housing Solutions and Mobility Choices Program EIR* document with associated appendices may be examined at https://www.sandiego.gov/ceqa/final. The project is required to provide VMT Reduction Measures as required by the ordinance that add up to at least 8 points as identified in the Land Development Manual Appendix T. The project includes the measures provided below as Mitigation Measure TRA-1:

- The Project will provide two (2) on-site bicycle repair stations (1.5 points per station x 2 stations = **3 points**)
- The Project will install five (5) electric bicycle charging stations (**2 points**)
- The Project will provide short-term bicycle parking spaces, at least 10% beyond minimum requirements. The Project is required to provide 138 spaces and the Project will provide 168 spaces, which is approximately 20% beyond the minimum requirements. Per Appendix T (Mobility Choices Regulations Implementation Guidelines) of the LDC, each multiple of 10% beyond the minimum equates to 1.5 points. (**3 points**).

In addition to Mitigation Measure TRA-1, the project would provide the following measures to further reduce VMT:

- The Project will install high visibility crosswalk striping on the south leg of the intersection of Lusk Boulevard and Wateridge Circle (1.5 points / 3 legs of intersection = **0.5 points**)
- As a part of the project frontage improvements, the Project will widen the sidewalk along its entire 2,200-ft frontage on Lusk Boulevard. This will be provided within a 22-ft parkway, consisting of an 8-ft wide non-contiguous sidewalk and a 14-ft landscape buffer, as part of the Project's widening of Lusk Boulevard to 4-lane Major standards. (3 points per mile of widening x 0.417 miles =**1.25 points**)

As shown above, the project's proposed VMT Reduction Measures total 9.75 points, exceeding the minimum required 8 points by the City of San Diego's Complete Communities: Mobility Choices regulations and intends to rely upon the Findings and Statement of Overriding Considerations from

the Complete Communities: Housing Solutions and Mobility Choices Final PEIR. Pursuant to CEQA Guidelines 15150, the Complete Communities EIR analysis of VMT impacts relating to the program and the effect of improvements resulting from the Mobility Choices Regulations on the reduction of per employee VMT is incorporated herein by this reference.

Therefore, the project would reduce its significant VMT impact to the extent feasible by complying with the City's Complete Communities: Mobility Choices program. Through the implementation of Mitigation Measure TRA-1 and the additional VMT Reduction Measures listed above, the project would not produce VMT impacts to an extent greater than the project and cumulative impacts analyzed in the PEIR. The project would be consistent with the designated MMCP land uses and zoning. In conclusion, the proposed project would mitigate the VMT impact to the extent feasible but still have a significant and unavoidable impact. This impact would not exceed the impacts identified in the PEIR analysis.

Emergency Access

Project driveways would be built to current standards per City Standard Drawings with appropriate widths, sight distance, curb returns, spacing, permitted turn movements, and accommodation of delivery vehicles. Therefore, the project would provide adequate emergency access. In conclusion, no project-specific significant effects that are peculiar to the project or its site would occur, and there would be no cumulative impact. Impacts would be less than significant, and no additional analysis is necessary.

Conclusion

Based on the foregoing analysis and information, there is no evidence that implementation of the project would require a major change to the PEIR relative to Transportation. The PEIR concluded that vehicle miles traveled impacts would be significant and unavoidable for employment uses and no mitigation was identified. The project would not substantially induce traffic, conflict with transportation policies, or pose safety hazards for vehicular travelers beyond the impacts identified in the PEIR. The project would not result in a new significant Transportation impact nor a substantial increase in the severity of Transportation impacts from those described in the PEIR.

Visual Effects and Neighborhood Character

PEIR

Visual Effects and Neighborhood Character impacts are evaluated in Section 5.13 of the PEIR.

Scenic Vistas

The PEIR identified that the proposed MMCP identifies future trail improvements/extensions and new pocket parks, linear parks, parklets, and scenic overlooks that will provide public access to scenic views of the MMCP area's canyons and natural resources and includes policies that emphasize views to the MMCP area's natural resources, coastal views, and open space areas. Although development in the MMCP area is anticipated to be concentrated in the proposed Urban Village areas and would occur within existing developed areas, it cannot be known at this program level of analysis without site-specific plans whether future redevelopment will result in a substantial obstruction of the scenic overlooks identified in the proposed MMCP. Thus, the PEIR identified

impacts as significant and unavoidable, and no feasible Mitigation Framework is available at this time. However, cumulative development and projects in surrounding communities would not contribute to localized visual impacts, and cumulative impacts would be less than significant.

Visual Character

The PEIR identified that the proposed MMCP includes policies intended to direct future development in a manner that improves the community's sense of place by transitioning towards a pedestrian-friendly community with unique districts and villages. The proposed MMCP-planned Urban Villages are primarily focused on infill development with a mix of compact uses, and mobility improvements support a pedestrian-oriented area with connections to transit and employment. This shift in character from a predominantly commercial and industrial employment center to a higher density, mixed-use Urban Village and employment hub would not substantially adversely alter the existing neighborhood character of the MMCP area as a whole. The PEIR identified project and cumulative impacts as less than significant, with no mitigation required.

Existing Landforms

The PEIR identified that it is anticipated that future development in accordance with the proposed MMCP would not result in substantial landform alteration because the MMCP area is largely developed with existing urban land uses concentrated on the relatively flat mesa top that characterizes most of the MMCP area. While the proposed MMCP would intensify some uses, the proposed MMCP contains policies to ensure that redevelopment takes into account existing landforms. As future development projects within the MMCP area are proposed, they would be reviewed to determine whether grading plans demonstrate compliance with the City's SDMC regarding grading and if a permit is required. Thus, the PEIR identified project and cumulative impacts related to landform alteration as less than significant, with no mitigation required.

Light and Glare

The PEIR identified that with adherence to the City's outdoor lighting and glare regulations, the MHPA Land Use Adjacency Guidelines, and MCAS Miramar ALUCP's lighting and glare regulations, project and cumulative impacts associated with lighting and glare would be less than significant with no mitigation required.

Landmark Trees

The PEIR identified that no designated distinctive or landmark trees occur within the MMCP area. Mature stands of trees can be found on the floor of canyon areas; however, such areas are not proposed for development. The proposed MMCP includes policies that promote the planting of new trees, and future development within the MMCP area would be subject to City Council Policy 900-19, which provides for the protection of street trees. Therefore, the PEIR identified project and cumulative impacts related to the loss of distinctive or landmark trees as less than significant with no mitigation required.

Project

Scenic Vistas

The project site is currently occupied by office land uses and does not include a public viewing area of the open space south of the site. Implementation of the project would replace the existing buildings with R&D and supporting amenities of similar size and height to the existing uses, and the

project would not encroach upon or otherwise impact the open space south of the site. The project would be consistent with the designated MMCP land uses and zoning. In conclusion, the proposed project and the associated impacts were addressed in the PEIR analysis. No project-specific significant effects that are peculiar to the project or its site would occur, and the project would not contribute to the significant cumulative impact identified in the MMCP PEIR. Impacts would be less than significant.

Visual Character

The project involves the replacement of an existing office land use with R&D buildings and supporting amenities. Therefore, the character of the site would be similar to existing conditions. Additionally, the project would be consistent with the site's zoning of IL-2-1 and land use designation of Industrial Employment/ Technology Park. Impacts would be less than significant.

Existing Landforms

The project involves the replacement of an existing office land use with R&D buildings and supporting amenities. Therefore, the landform of the site would be similar to existing conditions. Additionally, the project would be consistent with the site's zoning of IL-2-1 and land use designation of Industrial Employment/ Technology Park. Impacts would be less than significant.

Light and Glare

The project site is located in an area that is developed with primarily commercial and industrial uses, with open space to the north. The existing light conditions in the project area include building lights, security lights, and adjacent commercial and industrial uses. The project would include lighting typical of industrial park land uses; such lighting would not create a new source of substantial light that would adversely affect daytime or nighttime views in the area. The project would adhere to the City's light and glare regulations. The project would be consistent with the designated MMCP land uses and zoning. Impacts would be less than significant.

Landmark Trees

Project implementation may result in the removal of onsite cultivated trees; however, the project would not result in the loss of any distinctive or landmark trees or stand of mature trees as identified in the MMCP. Impacts would be less than significant.

Conclusion

Based on the foregoing analysis and information, there is no evidence that implementation of the project would require a major change to the PEIR relative to Visual Effects and Neighborhood Character. The PEIR concluded that impacts on scenic vistas would be significant and unavoidable and no mitigation was identified. The project would not degrade a scenic vista or change the visual character of the site through landform modifications, the introduction of new sources of light or glare, or the removal of landmark trees. The project would not result in new significant Visual Effects and Neighborhood Character impact nor a substantial increase in the severity of Visual Effects and Neighborhood Character impacts from those described in the PEIR.

VI. ISSUES NOT ANALYZED IN THE PREVIOUS EIR

CEQA Guidelines, Section 15128, allows environmental issues for which there is no likelihood of a significant impact to not be discussed in detail or analyzed further in the PEIR. The certified PEIR provided a consistent level of analysis of impacts, even for those issue areas considered to result in impacts found not to be significant.

Revisions to the project components evaluated under the PEIR are proposed with the current project. Through the environmental analysis conducted, the City has determined that the current project, subject of and evaluated under this Addendum, would not have the potential to cause significant impacts on those issue areas beyond those analyzed. While these issues were not analyzed in detail, as outlined in CEQA Section 15128, there is no new information available that would indicate that these issues would result in new significant impacts.

VII. SIGNIFICANT UNMITIGATED IMPACTS

The PEIR Chapter 7, Other Mandatory Discussion Areas, identifies the following significant unmitigated impacts: air quality; historical, archaeological, and tribal cultural resources; noise; public services and facilities; public utilities; transportation; and visual effects and neighborhood character. As there were significant unmitigated impacts associated with the original project approval, the decision maker was required to make specific and substantiated "CEQA Findings" which stated: (a) specific economic, social, or other considerations which make infeasible the mitigation measures or project alternatives identified in the PEIR, and (b) the impacts have been found acceptable because of specific overriding considerations. Given that there are no new or more severe significant impacts that were not already addressed in the previous certified PEIR, new CEQA Findings and/or Statement of Overriding Considerations are not required.

The project would not result in additional significant impacts nor would it result in an increase in the severity of impacts from that described in the previously certified PEIR.

VIII. MITIGATION, MONITORING, AND REPORTING PROGRAM (MMRP) INCORPORATED INTO THE PROJECT

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

1. Prior to the issuance of a Notice To Proceed (NTP) for a subdivision, or any construction permits, such as Demolition, Grading or Building, 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 are incorporated into the design.

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: https://www.sandiego.gov/development-services/formspublications/design-guidelines-templates

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

5. **SURETY AND COST RECOVERY** – The Development Services Director or City Manager may require appropriate surety instruments or bonds from private Permit Holders to ensure the long-term performance or implementation of required mitigation measures or programs. The City is authorized to recover its cost to offset the salary, overhead, and expenses for City personnel and programs to monitor qualifying projects.

B. GENERAL REQUIREMENTS: PART II – Post Plan Check (After permit issuance/Prior to start of construction)

1. **PRECONSTRUCTION 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), and Job Site Superintendent.

   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) No. 615398 and/or Environmental Document No. 615398, shall conform to the mitigation requirements contained in the associated Environmental Document and implemented to the satisfaction of the DSD's Environmental Designee (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.

A. **OTHER AGENCY REQUIREMENTS:** Evidence of compliance with all other agency requirements or permits 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**

B. **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.

   Note: Surety and Cost Recovery – When deemed necessary by the Development Services Director or City Manager, additional surety instruments or bonds from the private Permit Holder may be required to ensure the long-term performance or implementation of required mitigation measures or programs. The City is authorized to recover its cost to offset the salary, overhead, and expenses for City personnel and programs to monitor qualifying projects.

C. **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

C. SPECIFIC MMRP ISSUE AREA CONDITIONS/REQUIREMENTS

Noise

NOI-1 **Construction Noise - Reduction Measures.** As called for in the MMCP PEIR, construction contractors shall implement the following measures to minimize short-term noise levels caused by construction activities. Measures to reduce construction noise shall be included in contractor specifications and shall include, but not be limited to, the following:

- Properly outfit and maintain construction equipment with manufacturer-recommended noise reduction devices to minimize construction-generated noise.
- Operate all diesel equipment with closed engine doors and equip with factory-recommended mufflers.
- Use electrical power to operate air compressors and similar power tools.
- Employ additional noise attenuation techniques, as needed, to reduce excessive noise levels, such as but not limited to, the construction of temporary sound barriers or sound blankets between construction sites and nearby noise-sensitive receptors.
- Notify adjacent noise-sensitive receptors in writing no later than 2 weeks prior to the start of construction of any construction activity such as jackhammering, concrete sawing, asphalt removal, pile driving, and large-scale grading operations that would occur within 100 feet of the property line of the nearest noise-sensitive receptor. The extent and duration of the construction activity shall be included in the notification.

Designate a "disturbance coordinator" who shall be responsible for receiving and responding to any complaints about construction noise or vibration. The disturbance coordinator shall determine the cause of the noise complaint and, if identified as a sound generated by construction area activities, shall require that reasonable measures be implemented to correct the problem. Potential measures to address the problem could include, but are not limited to, providing sound barriers or sound blankets between construction sites and the receiver location, locating noisy equipment as far from the receiver as possible, and reducing the duration of the noise-generating construction activity.

Transportation

TRA-1 The project will provide VMT Reduction Measures totaling at least eight points per the City of San Diego's *Land Development Manual Appendix T* and implement the TDM Program outlined in Section 16.0, *Transportation Demand Management (TDM) Program* of the project's approved LMA. The following measures would be implemented to reduce the project's VMT:

- The Project will provide two (2) on-site bicycle repair stations (1.5 points per station x 2 stations = **3 points**)
- The Project will install five (5) electric bicycle charging stations (**2 points**)

- The Project will provide short-term bicycle parking spaces, at least 10% beyond minimum requirements. The Project is required to provide 138 spaces and the Project will provide 168 spaces, which is approximately 20% beyond the minimum requirements. Per Appendix T (Mobility Choices Regulations Implementation Guidelines) of the LDC, each multiple of 10% beyond the minimum equates to 1.5 points. (**3 points**).

IX. CERTIFICATION

Copies of the addendum, the certified PEIR, the Mitigation Monitoring and Reporting Program, and associated project-specific technical appendices, if any, may be accessed on the City's CEQA webpage at www.sandiego.gov/ceqa/final.

Jeffrey Szymanski
Senior Planner
Development Services Department

March 14, 2025
Date of Final Report

Attachments:

List of Acronyms and Abbreviations
References
Figure 1: Regional Location
Figure 2: Aerial Photograph
Figure 3: Site Plan
Figure 4: Generator Barriers

Appendices:

Appendix A: Air Quality Technical Report
Appendix B: Environmentally Sensitive Lands Assessment
Appendix C: Preliminary Geotechnical Investigation
Appendix D: CAP Consistency Checklist
Appendix E: Archaeological Resources Report Form
Appendix F: Vehicle Miles Traveled Assessment
Appendix G: Stormwater Management Investigation
Appendix H: Noise Technical Report
Appendix I: Waste Management Plan
Appendix J: Local Mobility Analysis

LIST OF ACRONYMS AND ABBREVIATIONS

ADT	average daily trips
AIA	Airport Influence Area
AICUZ	Air Installations Compatible Use Zone
ALUC	Airport Land Use Compatibility
ALUCP	Airport Land Use Consistency Plan
BMP	best management practice
CAL FIRE	California Department of Forestry and Fire Protection
CalEEMod	California Emissions Estimator Model
CAP	Climate Action Plan
CBC	California Building Code
CD	Construction Documents
CDFW	California Department of Fish and Wildlife
CDP	Coastal Development Permit
City	City of San Diego
CNEL	community noise equivalent level
CO	carbon monoxide
CWA	Clean Water Act
CY	cubic yards
dB	decibel
DSD	Development Services Department
DTSC	Department of Toxic Substances Control
ED	Environmental Designee
ESL	Environmentally Sensitive Lands
FEMA	Federal Emergency Management Agency
ft	foot
GHG	greenhouse gas
HVAC	heating, ventilation, and air conditioning
IL-2-1	Light Industrial Zone
LDC	Land Development Code
LMA	Local Mobility Analysis
MBTA	Migratory Bird Treaty Act
MCAS	Marine Corps Air Station

MHPA	Multi-Habitat Planning Area
MMC	Mitigation Monitoring Coordination
MMCP	Mira Mesa Community Plan
MSCP	Multiple Species Conservation Program
NAHC	Native American Heritage Commission
NPDES	National Pollutant Discharge Elimination System
NSLU	Noise Sensitive Land Use
NTP	Notice to Proceed
PEIR	Program Environmental Impact Report
PTS	Project Tracking System
PUD	Public Utilities Department
R&D	research and development
RAQS	Regional Air Quality Strategy
RE	Resident Engineer
SANDAG	San Diego Association of Governments
SAP	Subarea Plan
SCH No.	State Clearinghouse Number
SCIC	South Coastal Information Center
SDAPCD	San Diego Air Pollution Control District
SDMC	San Diego Municipal Code
SDR	sustainable development regulation
SF	square foot
SIP	State Implementation Plan
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TPA	Transit Priority Area
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	vehicle miles traveled
VPHCP	Vernal Pool Habitat Conservation Plan

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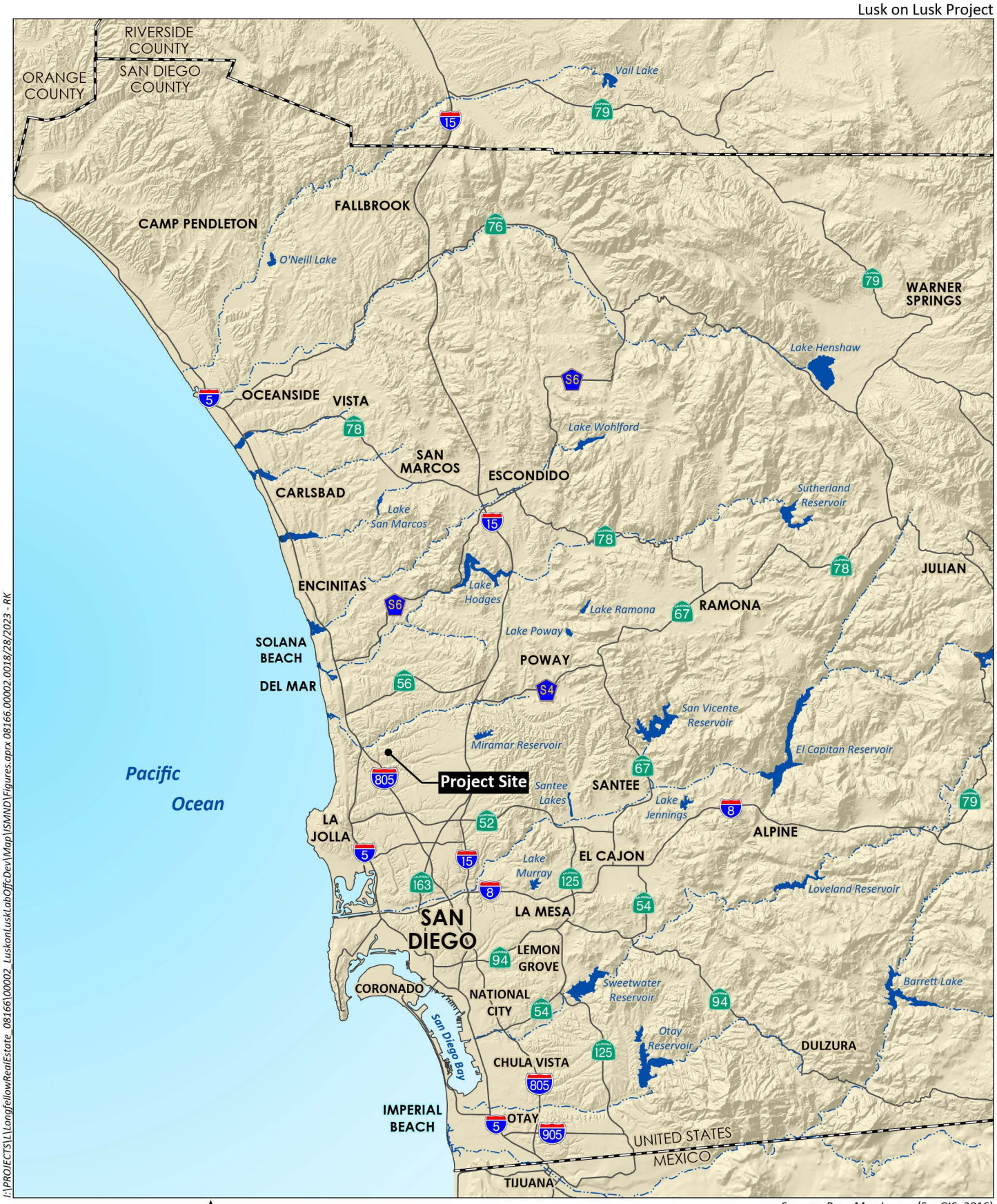

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0 8 Miles

Source: Base Map Layers (SanGIS, 2016)

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Regional Location

Figure 1

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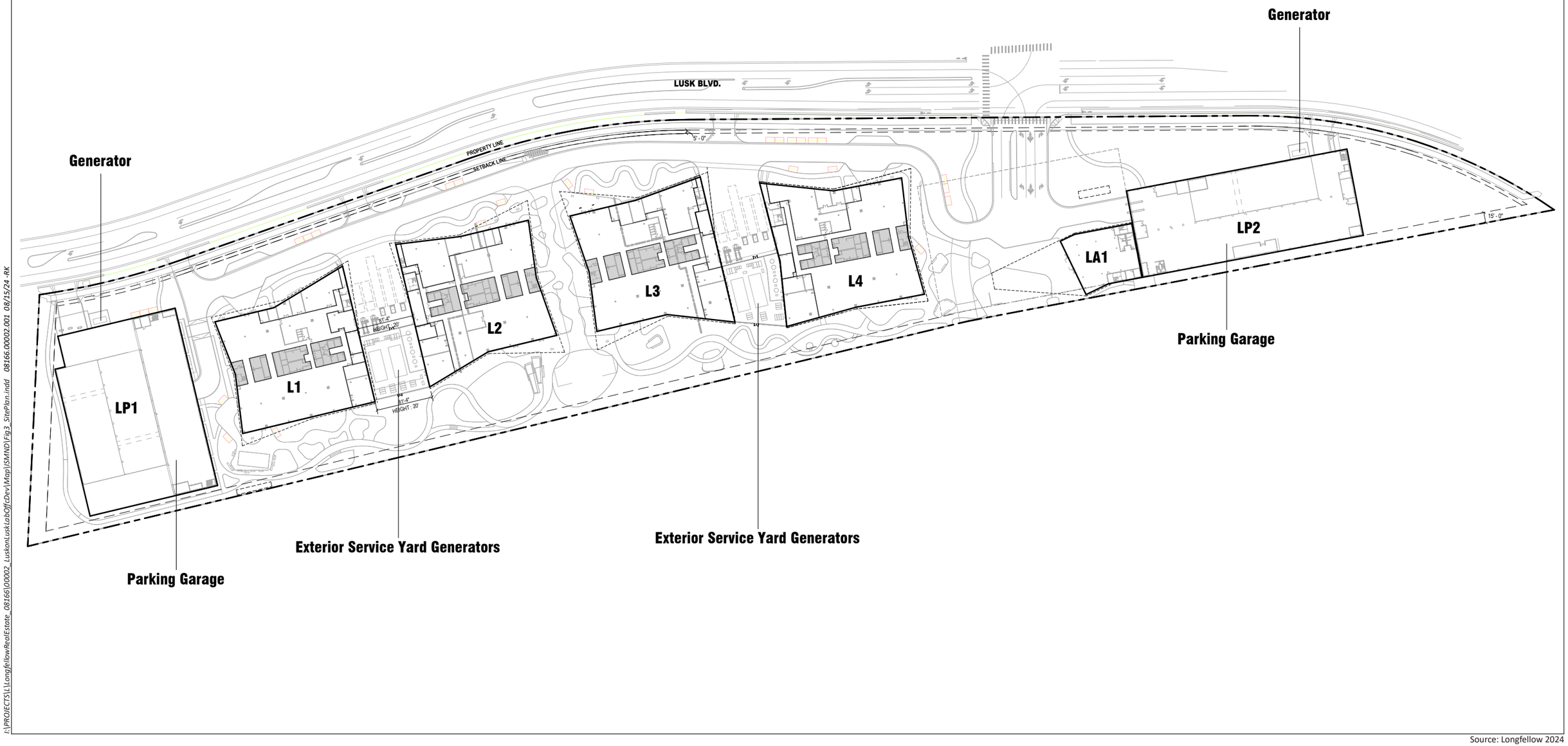
0 400 Feet

Source: Aerial (SanGIS, 2023)

HELIX Environmental Planning

Aerial Photograph

Figure 2



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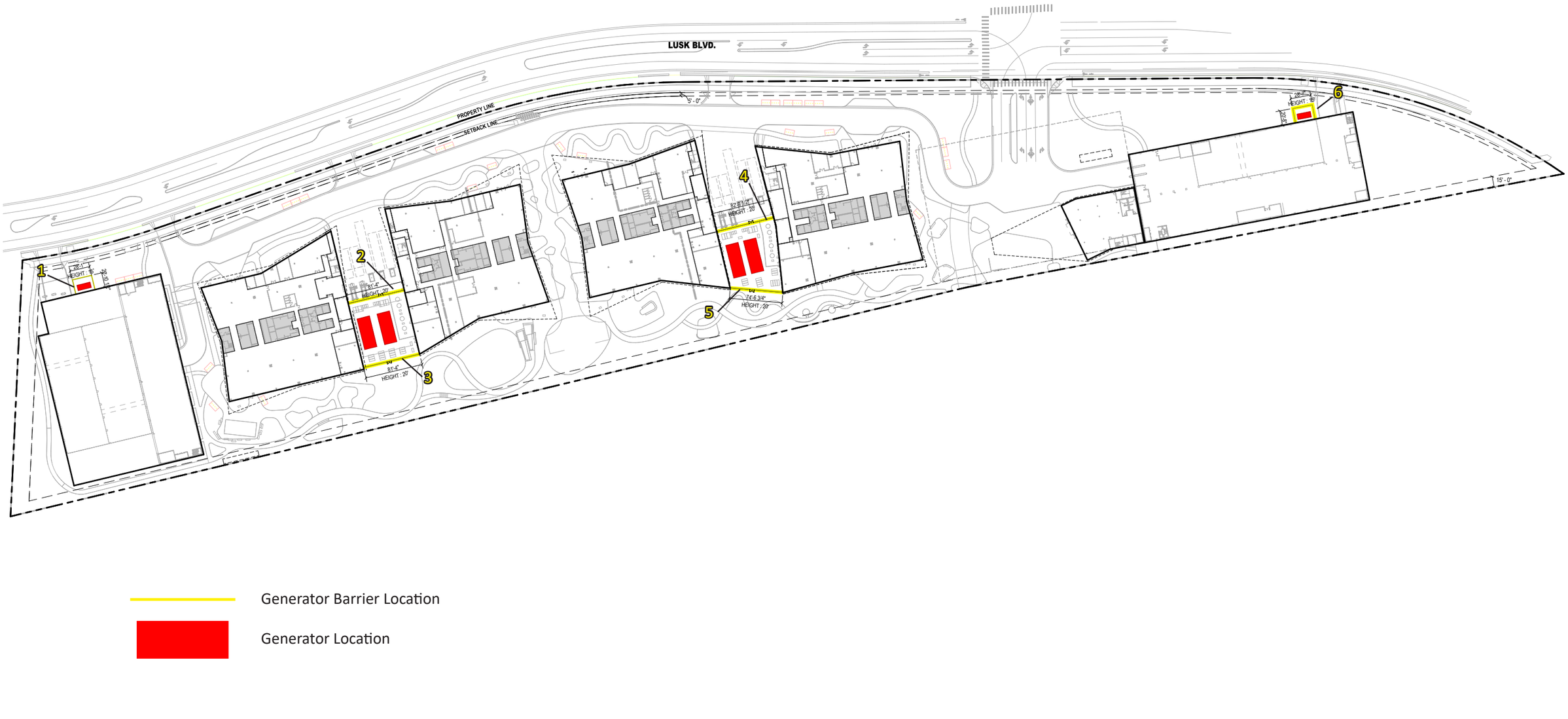
Source: Longfellow 2024



Source: Longfellow 2024

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Generator Barrier Locations

Figure 4