

DRAFT ADDENDUM TO ENVIRONMENTAL IMPACT REPORT

WBS/IO No. S-22005 Addendum to EIR No. 346289 SCH No. 2013111017

SUBJECT:

ALVARADO CANYON ROAD REALIGNMENT: SITE DEVELOPMENT PERMIT (SDP) for realignment of Alvarado Canyon Road to the intersection with Fairmount Avenue and Mission Gorge Road, widening of Fairmount Avenue from a 4-lane Major Street to a 6lane Major Street, widened sidewalks, buffered Class II bike lanes, a two-way Class IV Cycle Track and MTS bus route connection on old eastbound Alvarado Canyon Road, ADA-compliant curb ramps and high visibility cross walks, storm drain upgrades, and water quality features. Preliminary Design Plans include a "Protected Intersection" variation for Alternative 1. To accommodate the realignment of Alvarado Canyon Road over Alvarado Creek, the project would construct a 110-foot-long, 55-foot-wide multispan precast girder bridge. Storm water improvements within the Alvarado Creek channel consist of adding two 8 ft. x 8 ft. culvert cells to the existing 12 ft. x 8 ft. box culvert crossing at Fairmount Avenue, channel transitions to culvert entrance and exit, and relining the north side channel sidewalls upstream of the transition for approximately 350 feet. (ASSESSOR PARCEL NUMBERS: 461-300-03, 461-300-04, 461-320-25, 461-320-24, 461-320-26, 760-226-78, 760-226-79, 461-320-02, 461-320-03, 461-320-04, 461-320-05, 461-320-28, 461-320-27, Right of Way.) APPLICANT/SPONSOR: Engineering and Capital Projects Department.

I. SUMMARY OF ORIGINAL PROJECT

The project site is within the plan boundaries of the Grantville Focused Planning Area (FPA) of the Navajo Community Plan. The Grantville Focused Plan Amendment Final Programmatic Environmental Impact Report (Project No. 346289; SCH No. 2013111017) (hereinafter referred to as the FPA PEIR) was certified by the San Diego City Council on June 9, 2015, Resolution No. 309788. The Grantville FPA involves an amendment to the Navajo Community Plan, a General Plan Amendment, update to the Navajo Public Facilities Financing Plan (PFFP), adoption of a Rezone Ordinance to implement the community plan, and an amendment to the City's Land Development Code (LDC) Grantville Community Plan Implementation Overlay Zone. In accordance with California Environmental Quality Act (CEQA) Guidelines Section 15168, the FPA PEIR examined the environmental impacts of the Grantville FPA.

The Grantville FPA area is located within the Navajo Community Planning area west of Interstate 15 (I-15) and north of Interstate 8 (I-8); bounded by the Admiral Baker Golf Course to the north and the

San Diego River to the west. The Grantville FPA area consists of approximately 280 acres and is comprised of commercial, office, industrial, public facility, park, and open space uses immediately north of I-8 and located along both sides of Fairmount Avenue, Friars Road, and Mission Gorge Road north to Zion Avenue.

The Grantville FPA area covers two (2) Community Plan Implementation Overlay Zones (CPIOZ) described in the Navajo Community Plan: Grantville-CPIOZ-Type A, and part of the existing San Diego River Subdistrict - CPIOZ Type B. The list of criteria for each CPIOZ is included in the text of the amendment to the Navajo Community Plan; however, the Grantville CPIOZ-Type A area is the primary focus of the Community Plan Amendment for the Navajo Community Plan. The Grantville CPIOZ-Type A promotes mixed-use, transit-oriented development with pedestrian and bicycle orientation and allows for increased density of up to 109 dwelling units per acre, resulting in a maximum total of approximately 4,594 dwelling units in the area surrounding the existing Grantville Trolley Station when certain criteria are met. Both areas follow the CPIOZ guidance per LDC Chapter 13, Article 2, Division 14.

The Navajo PFFP Update reflects the community's boundary, development assumptions at community build-out, a listing of capital improvements, and an updated fee schedule. The Development Impact Fees (DIFs) provide a funding source for public facilities projects in the Navajo Community and were adopted in conjunction with the community plan amendment and certification of the FPA PEIR.

The FPA PEIR concludes that the project would result in significant and unavoidable environmental impacts for land use (noise compatibility), air quality, noise (operational), and transportation/circulation. The following issue areas were determined to be potentially significant but reduced to below a level of significance with mitigation: Noise (Construction), Biological Resources, Hydrology/Water Quality, Historical Resources (Built Environment and Archaeological), Geologic Conditions, Health and Safety, and Public Utilities (Solid Waste). Impacts for the following issue areas were determined to be less than significant: Greenhouse Gas Emissions, Paleontological Resources, Visual Quality/Neighborhood Character, Public Services and Facilities, Agricultural and Forest Resources, Mineral Resources, and Population and Housing.

II. SUMMARY OF PROPOSED PROJECT

The purpose of the project is to alleviate current and projected future traffic congestion on Alvarado Canyon Road, Fairmount Avenue, Mission Gorge Road, and adjoining intersections; while improving pedestrian and bicycle circulation within the project limits, improving access for transit and car-pool users at the Grantville Trolley Station and Park & Ride, and addressing localized flooding issues for Alvarado Creek. Other Project goals include coordination of the design with adjacent developments and public improvement projects, providing enhanced opportunities for pedestrian, bicycle, and bus facilities, and providing a transportation facility that supports the revitalization of the Grantville community within the City of San Diego. See Figure 1 for a Regional Map and Figure 2 for Vicinity Map.

Proposed baseline project features include the realignment of Alvarado Canyon Road to the intersection with Fairmount Avenue and Mission Gorge Road, widening of Fairmount Avenue from a four-lane Major Street to a 6-lane Major Street, widened sidewalks, buffered Class II bike lanes, a

two-way Class IV Cycle Track and MTS bus route connection on old eastbound Alvarado Canyon Road, ADA compliant curb ramps and high visibility cross walks, storm drain upgrades, and water quality features. In addition to the baseline project features, the protected intersection alternative includes protected Class II bike lanes, dedicated bicycle curb ramps, and leading pedestrian and bicycle signal phases at the Fairmount Avenue/Mission Gorge Road/Alvarado Canyon Road intersection (Figure 3 Project Features). Preliminary Design Plans (Figure 4) include "Protected Intersection" variations for Alternatives 1a and 1b.

To accommodate the realignment of Alvarado Canyon Road over Alvarado Creek, the project would construct a 110-foot-long, 55-foot-wide multi-span precast girder bridge. The south end of the bridge would tie into the existing roadway grade adjacent to the I-8 west off-ramp bridge to maintain the minimum vertical clearance of 15'-1" for eastbound Alvarado Canyon Road below the bridge structure.

Storm water improvements within the Alvarado Creek channel consist of adding two 8 ft. x 8 ft. culvert cells to the existing 12 ft. x 8 ft. box culvert crossing at Fairmount Avenue, channel transitions to culvert entrance and exit, and relining the north side channel sidewalls upstream of the transition for approximately 350 feet. The proposed widening of this existing box culvert will help alleviate flooding.

The project would be consistent with the goals and policies within the adopted plans that govern the community. The project would be consistent with the City of San Diego General Plan by reducing flooding and improving traffic circulation on Alvarado Canyon Road, Mission Gorge Road, and Fairmount Avenue. Also, the project was included in the 2015 Grantville Focused Community Plan Amendment and 2015 Navajo Public Facilities Financing Plan, both supporting revitalizing the Grantville community within the City.

Cranes, excavators, dozers, dump trucks, concrete trucks, drill rigs and concrete pumps are anticipated to be required to construct the project. Temporary traffic handling and traffic detours would be required for the duration of construction. Utility relocations would also be necessary. Alvarado Creek conveys storm water runoff to prevent floods and will remain active during project construction. Post construction, maintenance would continue under the Citywide Municipal Waterways Maintenance Program (MWMP).

Alvarado Canyon Road is owned and maintained by the City. A portion of Fairmount Avenue is within Caltrans right-of-way (ROW); therefore, coordination and an encroachment permit from Caltrans will be required. ROW acquisitions, temporary construction easements, temporary construction access agreements, and encroachment permits will be needed to accommodate construction. The project would result in full and partial ROW acquisitions and other potential real property agreements to accommodate the construction of the new road.

III. ENVIRONMENTAL SETTING

The project is in the community of Grantville, located centrally in the City of San Diego, California, within the United States Geological Survey (USGS) La Mesa 7.5-minute topographic quadrangle. The project is located on the north side of Interstate (I)-8. Alvarado Canyon Road is a two-lane collector

road with a direct westbound connection to the westbound I-8 off-ramp that is located approximately 300 feet east of the Camino del Rio North/Fairmount Avenue intersection.

The project area encompasses the following intersections:

- Westbound I-8 off-ramp/Fairmount Avenue/Camino del Rio North;
- Mission Gorge Road/Fairmount Avenue;
- Mission Gorge Road/Mission Gorge Place; and
- Alvarado Canyon Road/Mission Gorge Place.

Per the 2024 General Plan, land uses in the Project vicinity consist of Automobile Dealership, Arterial Commercial, Residential Under Construction, and Multi-Family Residential. The MHPA is situated approximately 700 feet west of the project area.

IV. ENVIRONMENTAL DETERMINATION

The City previously prepared and certified the **Grantville Focused Plan Amendment Final Programmatic** Environmental Impact Report (EIR) No. **346289/SCH No. 2013111017**. Based on all available information in light of the entire record, the analysis in this Addendum, and pursuant to Section 15162 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; or
- 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, 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 and 15164 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 has been prepared in accordance with Section 15164 of the CEQA State Guidelines. The FPA PEIR has been incorporated by reference pursuant to CEQA Guidelines Section 15150. 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 FPA 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 FPA PEIR identifies significant and unavoidable impacts related to Land Use (noise compatibility), Air Quality, Noise (operational), and Transportation/Circulation, as these issue areas would not be fully mitigated to below a level of significance. With respect to cumulative impacts, implementation of the FPA PEIR would result in significant and unavoidable cumulative impacts to Land Use (related to noise), Transportation/Circulation, Air Quality and Odor, and Noise.

The FPA PEIR identifies significant direct impacts that would be substantially lessened or avoided with subsequent projects' implementation of the mitigation framework included in the Final PEIR, including impacts related to Noise (construction), Biological Resources, Hydrology/Water Quality, Historical Resources (built environment and archaeological), Geologic Conditions, Health and Safety, and Public Utilities (solid waste).

An overview of the project's impacts and how it relates to those of the previously certified FPA PEIR is provided below in Table 1, Impact Assessment Summary. 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.

Table 1: Impact Assessment Summary

Environmental Issues	FPA PEIR Significance	Proposed Project Significance	Proposed Project Mitigation
Land Use	SU	LTSM	Yes
Transportation/Circulation	SU	LTS	No
Air Quality and Odor	SU	LTSM	Yes

Greenhouse Gas	LTS	LTS	No
Emissions			
Noise	SU	LTSM	Yes
Biological Resources	LTSM	LTSM	Yes
Hydrology and Water	LTSM	LTSM	Yes
Quality			
Historic Resources	LTSM	LTSM	Yes
Visual	LTS	LTS	No
Effects/Neighborhood			
Character			
Geologic Conditions	LTSM	LTSM	Yes
Paleontological Resources	LTS	LTS	No
Health and Safety	LTSM	LTSM	Yes
Public Services	LTS	LTS	No
Agricultural and Mineral	NI	NI	No
Resources			
Mandatory Findings	SU	LTSM	Yes
Significance			

NI = No Impact; LTS = Less than Significant; LTSM = Less than Significant with Mitigation

Land Use

FPA PEIR

Section 5.1 of the FPA PEIR provided an analysis of land use impacts associated with the FPA.

Issue 1 analyzes the FPA's consistency with applicable land use plans on a plan-by-plan basis, including the City of San Diego General Plan (General Plan), the City of San Diego LDC, the Navajo Community Plan, the Multiple Species Conservation Program (MSCP), the San Diego River Park Master Plan, the Montgomery Field Airport Land Use Compatibility Plan (ALUCP), the SANDAG Regional Comprehensive Plan, and Historical Resources Regulations (Section 143.0210 of the LDC). The FPA PEIR concludes that the FPA would have a potentially significant impact because historical resources are known to occur within the FPA area that could be disturbed during future development, and the FPA would conflict with the goal in Section E of the General Plan Noise Element. The FPA PEIR determines that the FPA would be consistent with all other aforementioned plans.

To reduce the historical resource-related impact, the FPA PEIR provides Mitigation Measures HR-1 and HR-2, which require the City to identify historical structures and the presence of archaeological resources prior to issuing any development permits, as well as ensure that acceptable site-specific mitigation is incorporated to reduce impacts. The FPA PEIR concludes that the implementation of these mitigation measures would reduce the impacts to historical resources to a less-than-significant level.

To reduce noise-related land use compatibility impacts, the FPA PEIR provides Mitigation Measures N-1 through N-6 and determines that the impact would remain significant and unmitigable. The goal

in Section E of the General Plan Noise Element aims to minimize exposure of noise-sensitive land uses to excessive commercial, industrial, and mixed-use related noise. The conflict with the FPA would occur because build-out under the FPA could potentially result in the exposure of noise-sensitive land uses (e.g., residences) to future noise levels that exceed those established in the General Plan Noise Element. The FPA EIR determines that the implementation of Mitigation Measures N-1 through N-6 would generally reduce noise-related land use compatibility impacts by requiring future development under the FPA to conduct a project-specific noise study, prepare a noise control plan, follow certain construction guidelines, and include noise attenuation techniques for projects that would expose residences to noise levels that exceed City standards. However, the FPA PEIR determines that these mitigation measures would not be able to reduce the impact to a less-than-significant level in all situations and, thus, would result in a conflict with the goal in Section E of the General Plan Noise Element. Because no other feasible mitigation was identified, the FPA PEIR concluded that the FPA would result in a significant and unmitigable impact regarding consistency with the Noise Element of the General Plan.

Issue 2 expands on the analysis of noise-related land use compatibility and analyzes both temporary construction noise and long-term operational noise. The FPA PEIR concludes that the FPA would have a potentially significant impact regarding both construction and operational noise because implementation of the FPA would result in the exposure of sensitive receptors to temporary and permanent noise levels that exceed City standards. The FPA PEIR discusses how construction noise associated with development under the FPA would occur throughout the plan area and could cause a temporary increase in noise level at adjacent sensitive receptors that exceeds the City standard of 75 dB Leg between the hours of 7:00 a.m. and 7:00 p.m. The FPA PEIR also discusses how increased traffic volumes associated with development under the FPA would result in increased traffic noise levels that are anticipated to exceed the applicable City threshold of 3 A-weighted decibels (dBA), resulting in a substantial permanent increase in noise level. As under Issue 1, Mitigation Measures N-1 through N-6 were provided. The FPA PEIR determines that implementation of these mitigation measures would avoid, reduce, or minimize impacts to the extent feasible. However, Mitigation Measures N-1 through N-6 would not be able to fully mitigate the impact to a less-than-significant level in all cases at the project-level. Therefore, the FPA PEIR concludes that the impact would remain significant and unmitigable.

Issue 3 analyzes the potential of the FPA to result in adverse edge effects to the Multi-Habitat Planning Area (MHPA). The FPA PEIR concludes that the impact would be potentially significant because future development under the FPA could potentially result in adverse edge effects (e.g., dumping, vehicular traffic, predation by domestic animals). This impact specifically pertains to future development under the FPA that occurs adjacent to the MHPA. MHPA land is located within and adjacent to the FPA area's western boundary, as well as adjacent to part of the FPA area's southern boundary. The impact was reduced to a less-than-significant level with the implementation of Mitigation Measure LU-1, which requires that all future actions undertaken at or near the San Diego River or adjacent to the MHPA be reviewed for consistency with all applicable MSCP requirements and MHPA Land Use Adjacency Guidelines.

Issue 4 analyzes the FPA's consistency with local plans, policies, and ordinances that protect biological resources. The FPA PEIR concludes that the impact would be potentially significant because future development under the FPA could have direct and indirect impacts to MHPA lands.

The impact was reduced to a less-than-significant level with the implementation of Mitigation Measure LU-1 discussed above.

Overall, land use impacts associated with the FPA are determined to be significant and unavoidable.

Project

The project is included as a feature within the previously adopted Grantville FPA. The project would not construct any structures, and the widened segments would serve future growth that was already anticipated in the Grantville FPA. The City would make partial property acquisitions from adjacent properties that would be included in the expanded roadway and realigned roadway footprints. These partial property acquisitions would be re-designated as City ROW and would not affect the overall land use pattern of the area.

The project site is located within Reach 1 of the Grantville Trolley Station/Alvarado Creek Revitalization Study, which requires improvements to the existing culvert and channel. Reach 1 also requires the implementation of a trail and a bike/pedestrian bridge. The bridge's north end would maintain a minimum 13 ft.-6 inch vertical clearance over a future bike trail and maintenance access road planned for the north side of the channel (per the Grantville Trolley Station/Alvarado Creek Revitalization Plan).

The project would be consistent with all four airport land use compatibility factors (noise, safety, airspace protection, and overflight) in the Montgomery Field ALUCP. It would also comply with the FAA's maximum height restriction of 200 feet for structures located within the Part 77 Notification Area. The project site is also located outside of all designated safety zones, airport overflight notification areas, and the airport's 60 dBA Community Noise Equivalent Level (CNEL) noise contour.

The project would also be consistent with the San Diego River Park Master Plan recommendations regarding the Confluence Reach section, development in the Grantville Subarea, and Alvarado Creek (Section 3.2.3, Confluence Reach) because the project would improve the creek passage under Mission Gorge Road and Fairmount Avenue to allow for improved creek flow, water quality and pedestrian safety in the Grantville community.

FPA PEIR Mitigation Measures HR-1 and HR-2 are applicable to the project and the requirements of both mitigation measures have already been completed through the preparation of the project-specific Archaeological Survey Report and Historic Resources Evaluation Report. The site was screened for existing historical and archaeological resources consistent with Historical Resources Regulations. The Archaeological Survey and the Historic Resources Evaluation report did not identify any historical or archaeological resources that could be impacted or disturbed by project construction. Nevertheless, the City will bring forward cultural resource monitoring as a project-specific mitigation measure, which is discussed under Historical Resources in further detail.

FPA PEIR Mitigation Measures N-2 through N-5 are applicable to the project; see Noise analysis below for further information.

Regarding consistency with the MHPA/MSCP Subarea Plan and ESL regulations, the project site is

not located within or adjacent to the MHPA boundary; therefore, implementation of Mitigation Measure LU-1 is not required.

Per the Water Quality Technical Memorandum prepared for the project, the project is consistent with plans and goals adopted by the community. The project is designed to be consistent with the City of San Diego General Plan by reducing flooding and improving traffic circulation on Alvarado Canyon Road, Mission Gorge Road, and Fairmount Avenue. Also, the Project was adopted in the 2015 Grantville Focused Community Plan Amendment and 2015 Navajo Public Facilities Financing Plan, both of which support the revitalization of the Grantville community within the City. Additionally, all roadways within the Project area will continue to hold the same roadway classifications. Lastly, no prime farmland is in the Project area (California Department of Conservation, 2024). The Project would not result in land use changes that conflict with the General Plan. Impacts would be less than significant, and no mitigation is required.

Transportation/Circulation

FPA PEIR

Section 5.2 of the FPA PEIR provides an analysis of transportation/circulation impacts associated with the implementation of the FPA.

Issue 1 concludes that the existing project and the year 2030 project impacts associated with traffic and capacity of the circulation system would be significant. Specifically, a total of 8 City street intersections and 15 roadway segments would be expected to operate at an unacceptable level of service (LOS), resulting in significant transportation impacts.

Mitigation Measures T-1 through T-22 were identified to reduce impacts, with each measure separately addressing 1) an intersection (T-1 through T-7) or 2) roadway segment (T-8 through T-22) for which a significant impact was identified. The FPA PEIR concludes that, when implemented, Mitigation Measures T-1, T-3, T-4, T-5, T-6, T-7, T-11, T-12, T-13, T-14, T-1 5, T-19, and T-20 would improve LOS to acceptable levels and reduce the impacts to less than significant. The FPA PEIR also found that Mitigation Measures T-8 and T-9 would improve LOS, but not to acceptable levels, so the impacts would remain significant and unavoidable. However, the FPA PEIR concludes that these 15 mitigation measures were infeasible because of the degree of future impacts and applicability, feasibility, specific design, and success of future mitigation measures cannot be adequately known for each specific future project at the program level in such a manner as to avoid conflict with the goals, policies, and objectives of the FPA, in particular those relating to pedestrians, bicycles, and transit-oriented development.

Implementation of Mitigation Measures T-2, T-10, T-16, T-17, and T-18 would improve LOS but not to acceptable levels so the impacts would remain significant and unavoidable. Mitigation Measures T-21 and T-22 would reduce LOS to acceptable levels, but the FPA PEIR concludes they were infeasible due to potential environmental effects to the San Diego River and nearby communities and residential properties, respectively.

Issue 2 concludes that transportation impacts related to the implementation of the FPA would be potentially significant, but the impact would be reduced to a less-than-significant level through

implementation of mitigation measures (described below), and with approval of an amendment to the Navajo Community Plan to convert land use designations and zoning within the FPA area. The FPA PEIR discusses that the FPA includes a land use amendment to convert a mostly commercial and industrial area to a mixed-use transit-oriented development that aims to reduce vehicle trips and promote all modes of transportation. Nevertheless, the FPA would ultimately result in increased density and, thus, a significant increase in Average Daily Trips (ADT) within the FPA study area. The FPA PEIR concludes that implementation of Mitigation Measures T-1 to T-7, T-11 to T-20, and T-23 to T-26 would ensure that the FPA would not result in trip generation in excess of the Navajo Community Plan trip allocation. Mitigation Measures T-1 to T-7 and T-11 to T-20 were included under Issue 1 to reduce significant impacts to transportation related to certain intersections and roadway segments. Mitigation Measures T-23 to T-26 were included specifically under Issue 2 and include measures to improve pedestrian and bicycle circulation, along with other transit improvements (e.g., wayfinding signage) and transportation demand management strategies (e.g., carpooling, vanpooling, telecommuting).

Issue 3 concludes that eight freeway segments, one freeway ramp, and two freeway interchange intersections would be expected to operate at an unacceptable LOS in the Year 2030, resulting in a potentially significant impact. The FPA PEIR provides Mitigation Measures T-27 through T-34 to mitigate impacts to freeway segments and Mitigation Measures T-35 through T-37 to mitigate impacts to freeway interchanges. However, the FPA PEIR concludes that the LOS impacts for certain freeway segments and interchanges would remain significant and unavoidable after implementation of mitigation measures.

Issue 4 concludes that because the FPA is designed to be consistent with the City's roadway standards, the FPA would not create a hazard for vehicles, bicycles, or pedestrians in the FPA area. Therefore, the FPA would have a less-than-significant impact regarding traffic hazards. Issue 5 concludes that the FPA would have no impact regarding consistency with local policies, plans, and programs that support alternative transportation modes because the FPA supports transit-oriented development and encourages the use of alternative transportation.

Overall impacts associated with Transportation and Circulation are determined to be significant and unavoidable.

Project

The FPA PEIR was adopted in May 2015, prior to the amendment to the CEQA Guidelines adding VMT as the primary measure of transportation impacts and to the requirement for analysis of VMT going into effect (i.e., July 1, 2020) as detailed in CEQA Guidelines Section 15064.3. In conformance with SB 743, the project's transportation impacts were evaluated using a VMT metric, pursuant to the latest direction from the OPR Technical Advisory, and consistent with the City's Transportation Study Manual (TSM) adopted by City Council in November 2020. As the City of San Diego has developed significance thresholds and technical methodologies, the TSM (September 2020) was utilized to perform a Project-Specific VMT Analysis. The TSM provides guidance for the City's CEQA significance thresholds, screening criteria, and methodology for conducting VMT analysis and for the preparation of Local Mobility Analyses (LMA) to identify off-site infrastructure improvements in the project vicinity that may be triggered with the development of a project, as well as to analyze site access and circulation and evaluate the local multi-modal network available to serve the project. According to

the TSM, transportation project types that would not result in increased vehicle travel have a less-than-significant impact and can be screened out from performing VMT analysis. These types of projects include:

- Rehabilitation/maintenance projects that do not add motor vehicle capacity
- Addition of bicycle facilities
- Intersection traffic signal improvements/turn-lane configuration changes
- Installation of roundabouts and traffic calming devices
- Implementation of roadways that are included in community plans approved after the comprehensive General Plan Update in 2008, if conditions are substantially improved for active transportation modes
- Additional capacity on local/collector streets if conditions are substantially improved for active transportation modes

If a roadway project classified as a major or primary arterial is included in a Community Plan that has been updated after the 2008 City of San Diego's comprehensive General Plan Update, it may be presumed to have a less than significant transportation impact with no additional transportation analysis of induced VMT necessary because these roadway projects are required to support citywide planned growth and implementation of the General Plan Goals, which are consistent with SB 743.

As the project was included in a community plan approved after the 2008 comprehensive General Plan Update, it may be presumed to have a less-than-significant transportation impact. Therefore, the project impacts would be less than significant, and no mitigation is required.

Air Quality and Odor

FPA PEIR

Section 5.3 of the FPA PEIR provides an analysis of air quality impacts associated with the implementation of the FPA.

Issue 1 analyzes the FPA's consistency with the San Diego Air Pollution Control District's (SDAPCD) 2009 Regional Air Quality Strategy (RAQS) and the State Implementation Plan (SIP). The FPA PEIR concludes that the impact would be less than significant because the changes in land uses proposed under the FPA, and the anticipated increase in residents would be within the RAQS population forecasts.

Issue 2 analyzes the potential of the FPA to result in a violation of any air quality standard or contribute substantially to an existing or projected air quality violation. The FPA PEIR concludes that the impact would be less-than-significant regarding operational CO emissions and potentially significant regarding construction emissions. Under Issue 2, the FPA PEIR does not make a significance determination regarding operational emissions of air pollutants other than CO because the operational thresholds for these pollutants are meant to be applied on a project-specific basis. Thus, because the FPA PEIR is a program-level document, operational emissions of criteria air pollutants were based on the FPA's consistency with applicable air quality plans, discussed under Issue 1, rather than applying numeric thresholds. Regarding construction emissions, the FPA PEIR discusses how future development under the FPA would generate temporary air pollutant emissions

primarily associated with fugitive dust (PM₁₀ and PM_{2.5}), exhaust emissions from heavy construction equipment, and ROG released during the drying phase of architectural coatings. Future development projects would be required to comply with construction-related regulations, including SDMC Section 142.0710, which requires watering of exposed soil at least twice daily during construction to reduce particulate matter emissions, and SDAPCD Rule 67.0, which provides standards for architectural coatings. The FPA PEIR includes Mitigation Measure AQ-1, which requires best available control measures/technology to be implemented during construction activities if emissions would exceed thresholds established by the City. With the implementation of Mitigation Measure AQ-1, the FPA PEIR concludes that the FPA would not result in the exceedance of air quality standards due to construction activities, and the impact would be reduced to a less-than-significant level.

Issue 3 analyzes the potential of the FPA to result in a cumulatively considerable net increase of any criteria pollutant for which the project region is designated non-attainment under a federal or State ambient air quality standard. The FPA PEIR concludes that short-term (i.e., construction-related) cumulative impacts would be less-than-significant with future project compliance with SDAPCD regulations and the SDMC, including implementation of required construction BMPs. However, the FPA PEIR concludes that long-term (i.e., operational) cumulative impacts associated with emissions from mobile, area, and energy sources would be potentially significant because of future development as part of the buildout of the FPA would result in a net increase in emissions of ROG, PM₁₀, PM_{2.5}, and CO, which could potentially affect San Diego's ability to meet regional, State, and federal ambient air quality standards. The FPA PEIR includes Mitigation Measure AQ-2, which requires projects that would significantly impact air quality, either individually or cumulatively, to develop and implement a Mitigation Monitoring and Reporting Program, including all feasible mitigation to avoid, minimize, or offset the impact. Although future discretionary projects would be subject to environmental review and evaluated for consistency with applicable plans, policies, guidelines, and regulatory standards, the FPA PEIR concludes that not all future projects would be able to reduce operational emissions to below threshold levels. Therefore, cumulative long-term operational emissions of ROG, PM₁₀, PM_{2.5}, and CO resulting from future development within the FPA area would be significant and unavoidable.

Issue 4 analyzes the potential of the FPA to expose sensitive receptors to substantial pollutant concentrations, including toxic air contaminants. The FPA PEIR concludes that the impact would be less than significant with compliance with SDMC Section 142.0710, which prohibits air contaminants that endanger human health, cause damage to vegetation or property, or cause soiling to spread beyond the boundaries of the site from which they originate. Thus, future projects' compliance with SDMC Section 142.0710 would reduce the potential for pollutants to affect nearby sensitive receptors.

Issue 5 analyzes the potential of the FPA to cause particulate matter (dust) emissions greater than 100 pounds per day (lb./day). The FPA PEIR concludes that construction-related particulate matter (PM₁₀, and PM_{2.5}) emissions would be less than significant with future project compliance with SDAPCD regulations and the SDMC, including implementation of required construction BMPs. However, the FPA PEIR concludes that operational emissions of PM₁₀ would be potentially significant because daily operational emissions of PM₁₀ at buildout of the FPA would be approximately 294 lb./day. The FPA PEIR concludes that although implementation of Mitigation Measures AQ-1 and AQ-2, discussed above, would reduce particulate matter emissions, not all future projects would be

able to reduce operational emissions of PM_{10} to a less-than-significant level. Therefore, the FPA PEIR concludes that the impact of operational PM_{10} emissions would be significant and unavoidable. The FPA PEIR also determined that additional mitigation measures may be required for future development on a project-specific basis.

Issue 6 analyzes the potential of the FPA to create objectionable odors affecting a substantial number of people. The FPA PEIR concludes that the mixed-use development that would occur under the FPA is not expected to create or emit objectionable odors. Therefore, the impact would be less than significant.

Overall impacts associated with Air Quality are determined to be significant and unavoidable.

Project

The RAQS is the applicable regional air quality plan that sets forth the San Diego Air Pollution Control District's (SDAPCD's) strategies for achieving the National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS). The RAQS was updated in 2022, after certification of the FPA PEIR. The growth projections used by the SDAPCD to develop the RAQS emissions budgets are based on the population, vehicle trends, and land use plans developed in general plans and used by the San Diego Association of Governments (SANDAG) in the development of the Regional Transportation Plan and Sustainable Communities Strategy. As such, projects that propose development that is consistent with anticipated SANDAG growth projections would not conflict with the RAQS.

The project is limited to the realignment and widening of an existing road consistent with the Grantville FPA. The project would not construct any housing or places of employment, and the widened roadway segments would serve future growth that is already anticipated within the Grantville FPA. Therefore, the project would not conflict with the implementation of the RAQS, and impacts would be less than significant.

Project construction would result in temporary emissions of criteria air pollutants and precursors associated with the use of off-road equipment, haul trucks delivering equipment and materials, and worker commute trips. A project-specific Air Quality Assessment was prepared for the project. Based on the potential for the proposed construction activities to exceed daily construction emissions, the project would implement FPA PEIR Mitigation Measure AQ-1.

Once construction is complete, the project will not be a source of new emissions. Furthermore, the widened roadways would improve traffic flow, which would decrease emissions associated with vehicle congestion and idling. Therefore, project operation would not generate emissions that would exceed the NAAQS or CAAQS, or contribute to existing violations, and impacts would be less than significant. The project would comply with SDAPCD and SDMC regulations and would implement BMPs during construction to reduce fugitive dust emissions, as required under SDMC Section 142.0710.

Sensitive receptors include schools and schoolyards, parks and playgrounds, daycare centers, nursing homes, hospitals, and residential housing. As discussed before, the project was developed to reduce existing traffic congestion that has resulted from growth that has already occurred and to

reduce projected traffic congestion that would result from growth that is planned or is projected to occur. Therefore, the project would not significantly impact air quality or expose sensitive receptors to substantial levels of pollution. FPA PEIR Mitigation Measure AQ-2 would therefore not apply to the project.

The operation of construction equipment and vehicles could generate odors associated with fuel combustion. However, these odors would dissipate into the atmosphere upon release and would only remain temporarily in proximity to the construction equipment and vehicles. Therefore, the proposed project would not create substantial amounts of objectionable odors affecting a substantial number of people. Impacts related to odors would be less than significant.

Greenhouse Gas Emissions

FPA PEIR

Section 5.4 of the FPA PEIR provides an analysis of impacts related to greenhouse gas (GHG) emissions associated with the FPA.

Issue 1 analyzes the GHG emissions that would directly and indirectly result from FPA implementation. The FPA PEIR concludes that the impact would be less-than-significant because project design features that would be incorporated into future development and State reduction measures that apply to future development would reduce total annual GHG emissions by approximately 44.2%, which is more than the threshold of an at least 28.3% reduction. The project design features and State reduction measures referenced in the FPA PEIR are provided below.

Issue 2 analyzes the potential of the FPA to conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. The FPA PEIR concludes that the FPA would not conflict with the City's sustainable community program, Climate Protection Action Plan, General Plan, or Climate Action Plan (CAP) and, thus, would result in a less-than-significant impact. Overall impacts associated with Greenhouse Gas Emissions were determined to be less than significant.

Project

After the adoption of the Grantville FPA, the City adopted an updated CAP that establishes a community-wide goal of new zero emissions by 2035. The CAP is a qualified plan for the reduction of GHG emissions for use in cumulative impact analysis pertaining to projects under CEQA Guidelines Section 15183.5. Pursuant to CEQA Guidelines Sections 15064(h)(3), 15130(d), and 15183(b), a project's incremental contribution to a cumulative GHG emissions effect may be determined not to be cumulatively considerable if it complies with the requirements of the CAP. The CAP includes six strategies developed to reduce citywide GHG emissions and achieve the GHG reduction targets identified in the CAP. The City issued an Environmental Guidance Memo that addresses the preparation of the CEQA analysis of the greenhouse gas emissions for public infrastructure projects, which requires public infrastructure projects to demonstrate consistency with the six CAP strategies.

The project would be consistent with the six strategies of the City's CAP. The project would not conflict with Strategy 1: decarbonization of the built environment, as no buildings would be constructed. Since the project would not alter energy sources, it would be consistent with Strategy 2:

Access to Clean and Renewable Energy. The project would include features such as widened sidewalks, buffered Class II bike lanes, a two-way Class IV Cycle Track and Metropolitan Transit System bus route connection on old eastbound Alvarado Canyon Road, ADA-compliant curb ramps, and a high-visibility crosswalk, and therefore would not conflict with Strategy 3: Mobility and Land Use. The project would be required to implement the Construction and Demolition (C&D) Debris Deposit Ordinance, among others, and would therefore be consistent with Strategy 4: Circular Economy and Clean Communities. The project would also improve the transportation system to provide resiliency during flooding, consistent with Strategy 5: resilient infrastructure and healthy ecosystems. Finally, Strategy 6: emerging climate actions is not directly applicable to the project, and the project would not conflict with the City's implementation of this strategy. Overall, the project would be consistent with the six CAP strategies. Consistency with the strategies of the CAP would result in a less-than-significant impact.

Noise

FPA PEIR

Section 5.5 of the FPA PEIR provides an analysis of construction and operational (i.e., traffic) noise impacts associated with the implementation of the FPA.

Issue 1 addresses the exposure of sensitive receptors to short-term construction noise and long-term traffic noise. The FPA PEIR identifies a potentially significant impact from the exposure of sensitive receptors to construction noise. The FPA PEIR explains that few noise-sensitive receptors exist in the FPA area because the land uses are primarily industrial and commercial. However, the FPA allows construction of new residential land uses and other noise-sensitive land uses (e.g., daycares, hotels). The severity of construction noise impacts would vary depending on the scope and location of specific projects, the type of surrounding uses, and the proximity of sensitive receptors. The FPA PEIR concludes that compliance with construction noise standards in the San Diego Municipal Code and implementation of Mitigation Measures N-1 through N-5 would reduce construction noise impacts to a less-than-significant level.

Regarding exposure of sensitive receptors to long-term traffic noise, the FPA PEIR identifies a potentially significant impact along Fairmount Avenue between Vandever Avenue and Twain Avenue because future traffic noise levels would increase by at least 3 dBA. The FPA PEIR did not identify a potentially significant long-term traffic noise impact along any other roadway segment in the FPA. The FPA PEIR concludes that implementation of Mitigation Measures N-1 through N-6 would reduce this operational traffic noise impact along the northern segment of Fairmount Avenue to the extent feasible but would not be able to fully mitigate the impact to a less-than-significant level. Mitigation Measure N-1 requires the development of a noise study to evaluate noise impacts. Mitigation Measure N-2 provides restrictions and requirements for the operation of construction equipment. Mitigation Measure N-3 limits the number of large pieces of construction equipment that can operate at once adjacent to a sensitive receptor. Mitigation Measure N-4 requires that neighbors be notified before noise-generating activity. Mitigation Measure N-5 requires the development of a Noise Control Plan. And, Mitigation Measure N-6 requires development projects involving new residential uses to incorporate noise-attenuating setbacks, design features, and materials into the project to achieve the 45 dBA interior standard for habitable rooms as required by the City.

Issue 2 analyzes the potential of the FPA to result in a substantial increase in existing ambient noise levels. The FPA PEIR identifies a potentially significant impact related to an increase in ambient noise levels because buildout under the FPA could result in a substantial increase in the existing ambient noise levels exceeding 3 dBA on the segment of Fairmont Avenue from Vandever Avenue to Twain Avenue, as discussed in Issue 1. Same as in Issue 1, the FPA PEIR concludes that implementation of Mitigation Measures N-1 through N-6 would reduce the ambient noise level increase from traffic along the northern segment of Fairmount Avenue to the extent feasible but would not be able to fully mitigate the impact to a less-than-significant level. Therefore, the FPA PEIR concludes that the impact would be significant and unavoidable.

Overall impacts associated with Noise are determined to be significant and unavoidable.

Project

A project-specific noise study was prepared for the project to assess construction and operational noise impacts. Preparation of the report has satisfied the requirements of Mitigation Measure N-1.

Section 59.5.0404 of the SDMC prohibits disturbing, excessive, or offensive construction noise occurring between the hours of 7:00 p.m. and 7:00 a.m. or on legal holidays and Sundays, unless a permit has been applied for and granted beforehand by the Noise Abatement and Control Administrator. Additionally, Section 59.5.0404 of the SDMC prohibits any construction activity that causes a noise level of 75 dBA Leq or louder from 7:00 a.m. to 7:00 p.m. at or beyond the property lines of any property zoned residential. Project construction would occur from 7:00 a.m. to 7:00 p.m. and would be prohibited on legal holidays and Sundays, pursuant to SDMC Section 59.5.0404. Results of the noise study indicate that construction equipment is expected to generate noise levels ranging from 70 to 90 dB at 50 feet. Therefore, the project would be required implement Mitigation Measures N-2 through N-5. Implementation of the mitigation measures would reduce the impact to a less than significant level.

The project is limited to widening and realignment of existing roads and would not construct any housing or other uses associated with sensitive receptors. The widened roadway segments would serve future growth that is already anticipated in the Grantville FPA and would not result in an increase in traffic and associated traffic-related noise. In addition, the project site is not located near Fairmont Avenue from Vandever Avenue to Twain Avenue, which was the only road segment identified in the FPA PEIR as having a significant long-term noise impact. In addition, the project site is located outside of any airport land use plan and would not expose people working or residing in the project area to excessive aircraft noise.

A Mitigation Monitoring Reporting Program (MMRP) is required, as detailed within Section VIII of the Addendum. With implementation of the monitoring program, potential noise impacts would be reduced to below a level of significance.

Biological Resources

FPA PEIR

Section 5.6 of the FPA PEIR provides an analysis of biological resource impacts associated with the FPA.

Issue 1 evaluates the potential of the FPA to result in a substantial adverse impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in the MSCP or other local or regional plans, policies, or regulations, or by the CDFW or USFWS. The FPA PEIR concludes that the impact would be potentially significant because direct impacts could potentially occur as a result of future development activities (e.g., disturbing nesting habitat), and indirect impacts could include increased edge habitat (i.e., habitat that borders development), night illumination of vegetation communities, and increased human interaction within wildlife corridors. The FPA PEIR explains that due to the programmatic nature of the analysis, it is not possible to determine specific impacts to sensitive species that would occur from future development projects in the FPA area, and future development activities would need to be evaluated on a project-specific basis. The FPA PEIR concludes that the implementation of Mitigation Measures BR-1 through BR-5 would reduce the impact to a less-than-significant level.

The Grantville FPA specifies that mitigation would apply to projects that result in impacts that are considered significant under the City of San Diego's Biology Guidelines and the City's CEQA Significance Determination Thresholds. Mitigation Measure BR-1 requires all subsequent projects within the Community Plan Implementation Overlay Zone (CPIOZ) Type B areas to be analyzed in accordance with the CEQA Significance Thresholds, which require that site-specific biological resource surveys be conducted in accordance with the City of San Diego Biology Guidelines. Mitigation Measure BR-2 requires future projects that result in impacts to sensitive upland Tier I, II, IIIA, or IIIB habitats to implement avoidance and minimization mitigation measures consistent with the City Biology Guidelines and MSCP Subarea Plan. Mitigation Measure BR-3 explains that relevant measures for mitigating impacts to sensitive species are provided elsewhere in LU-1 and BR-1 through BR-5. As discussed in the Land Use section, Mitigation Measure LU-1 requires that all future actions undertaken at or near the San Diego River or adjacent to the MHPA be reviewed for consistency with all applicable MSCP requirements and MHPA Land Use Adjacency Guidelines. Mitigation Measure BR-4 addresses impacts to wetlands and requires all subsequent projects to comply with USACE Clean Water Act Section 404 requirements, CDFW Section 1602 Streambed Alteration Agreement requirements, and the City of San Diego Environmentally Sensitive Lands (ESL) Regulations for minimizing impacts to wetlands. Mitigation Measure BR-5 addresses impacts to migratory wildlife and wildlife corridors and requires that the biological resources survey required under Mitigation Measure BR-1 includes mitigation that reduces impacts that would interfere with the nesting, foraging, or movement of wildlife species.

Issues 2 and 3 are combined, and together they evaluated the potential of the FPA to result in a substantial impact on wildlife habitat and sensitive natural communities, including wetlands. Substantial adverse impacts on wetlands include, but are not limited to, direct removal, filling, and hydrological interruption. The FPA PEIR concludes that the impact on wildlife habitat and sensitive natural communities, including wetlands, would be potentially significant because future development projects would potentially have direct and indirect impacts on Tier I through Ill vegetation communities, as well as wetlands and other sensitive vegetation communities identified by the USFWS and/or CDFW. The FPA PEIR explains that future development activities would need to be evaluated on a project-specific basis and determined that implementation of Mitigation

Measures BR-1 through BR-5, described above, would reduce potential impacts to wildlife habitat and sensitive natural communities, including wetlands, to a less-than-significant level.

Issue 4 evaluates whether the FPA would substantially interfere with the movement of any native resident or migratory fish or wildlife species; interfere with established native resident or migratory wildlife corridors, including linkages identified in the MSCP Plan; or impede the use of native wildlife nursery sites. The FPA PEIR concludes that the impact would be potentially significant because future development projects could have direct and/or indirect impacts to the regional wildlife corridor that links Mission Trails Regional Park with Mission Bay Park, such as increased nighttime illumination and human intrusion. However, the FPA PEIR explains that future development activities would need to be evaluated on a project-specific basis, and future activities would be required to comply with the Multi-Habitat Planning Area (MHPA) Land Use Adjacency Guidelines of the Multiple Species Conservation Program (MSCP) Subarea Plan. With the implementation of these regulations and Mitigation Measures BR-1 through BR-5, described above, the FPA PEIR determines that the impact would be reduced to a less-than-significant level.

Issue 5 evaluated the FPA's consistency with local, regional, and state plans that protect wildlife habitat. The FPA PEIR concludes that the impact would be potentially significant because the FPA would have the potential to result in direct and indirect impacts to MHPA lands. The FPA PEIR explained that the in-depth analysis for this impact is included in Section 5.1, "Land Use," which concluded that the impact would be reduced to a less-than-significant level with implementation of Mitigation Measure LU-1. Mitigation Measure LU-1 requires that all future actions undertaken at or near the San Diego River or adjacent to the MHPA be reviewed for consistency with all applicable MSCP requirements and MHPA Land Use Adjacency Guidelines (LUAGs).

Issue 6 evaluates the potential of the FPA to result in the introduction of invasive plant species into natural open space. The FPA PEIR concludes that the impact would be potentially significant because while direct impacts are not anticipated as a result of FPA implementation, indirect impacts could occur due to an increase in edge habitat or disturbance or removal of native vegetation communities. However, the FPA PEIR determines that implementation of Mitigation Measure LU-1, described above, would reduce the impact to a less-than-significant level.

Issue 7 evaluates the potential of the FPA to result in discharging into receiving waters with Environmentally Sensitive Lands or water bodies. The FPA PEIR concludes that the impact would be less-than-significant because future projects would be required to adhere to the requirements of the Regional Water Quality Control Board (RWQCB) and San Diego Municipal Code (SDMC), including the requirements of the MS4 permit for the San Diego Region and the City's Storm Water Standards Manual; implementation of BMPs, and compliance with the California BMP Handbook. Temporary and permanent impacts terminology is utilized through the biological resources discussion to distinguish permanent structures and project features compared to areas that would be vegetated following Project implementation. However, the City requires that temporary impacts be mitigated as permanent impacts.

Overall impacts associated with Biological Resources are determined to be mitigated to less than significant.

Project

Consistent with the mitigation framework, a site-specific Natural Environment Study (NES) was prepared for the project (Dokken Engineering, 2025). Since the City may seek Federal funding for a portion of the project, an NES was prepared, which also includes evaluation of potential impacts for CEQA analysis under the City of San Diego Biology Guidelines.

Literature and database search, and field surveys were conducted within the project boundary and included a 50-foot buffer to assess the vegetation communities and species on site and determine what impacts would result through project implementation. The study identified four vegetation communities within the project site and included riparian scrub and Alvarado creek (disturbed wetland).

Pursuant to the City Biology Guidelines (2018) of the Land Development Manual, impacts to sensitive biological resource such as Wetlands Habitats exceeding 0.01-acre (outside Coastal Overlay Zone) or Tier I-III Upland Habitats exceeding 0.1-acre would be significant and require mitigation. In addition, the project would result in direct impacts to wetland and non-wetland waters, streambed, and riparian habitat, potentially subject to USACE jurisdiction pursuant to Section 404 of the Clean Water Act (CWA; 33 USC 1344), RWQCB jurisdiction pursuant to Section 401 of the CWA and State Porter-Cologne Water Quality Control Act, and streambed and riparian habitat potentially subject to CDFW jurisdiction pursuant to Sections 1600 et seq. of the California Fish and Game Code (CFG Code). Temporary and permanent impacts to wetlands are anticipated to be about 0.14 acre. Impacts to the wetland and non-wetland waters may require the issuance of a CWA Section 404 permit from the USACE, a CWA Section 401 Water Quality Certification or State Porter-Cologne Water Quality Control Act Waste Discharge Requirements (WDRs) from the RWQCB, and/or a Streambed Alteration Agreement from CDFW. Only the USACE, RWQCB, and CDFW can make a final determination of jurisdictional boundaries. The proposed project would be required to obtain permits for work within US and state jurisdictional wetlands and non-wetland waters from all required wetland permitting agencies prior to implementation of activities that would result in impacts to jurisdictional resources.

The project would implement PEIR mitigation measures BR-1, and BR-4, and associated project-specific mitigation as detailed in the MMRP in Attachment A, to ensure biological survey information is updated and potential impacts to sensitive habitat(s) are reduced to a level less than significant.

The project may result in impacts to nesting least Bell's vireo which have a moderate potential to occur adjacent to project construction areas. Excessive noise in proximity to active least Bell's vireo nest may result in nest failure which can be considered take, which is not authorized under the City's MSCP and therefore would be significant, absent mitigation. The project would implement the associated project-specific mitigation as detailed in the MMRP to reduce potential impacts to a level less than significant.

Yellow warbler was detected within the project area, and there is suitable habitat of densely vegetated riparian woodland at the western edge of the project limits. Therefore, it is presumed to be present within the area. Yellow warbler is a CDFW species of special concern. Impacts to occupied and potential yellow warbler habitat within the project area are considered significant and

would require mitigation. The project would implement the associated project-specific mitigation as detailed in the MMRP to reduce potential impacts to a level less than significant.

The project site is not designated as a MSCP regional wildlife corridor pursuant to the MSCP Final Plan, as it does not provide a linkage for wildlife species by connecting with major areas of off-site habitat. The project site would not be considered a significant wildlife movement corridor. As described in the Land Use section above, the project is not located within or adjacent to the MHPA, and therefore would not conflict with the MSCP or introduce any invasive plant species within the area. No impacts would occur. The project would implement PEIR mitigation measure BR-3 and associated project-specific mitigation to reduce impacts to less than significant.

Hydrology and Water Quality

FPA PEIR

Sections 5.7 and 5.8 of the FPA PEIR provides an analysis of hydrology and water quality impacts, respectively, associated with the FPA.

Section 5.7 Issue 1 analyzes the potential of the FPA to result in a change in absorption rates, drainage patterns, or the rate of surface runoff. The FPA PEIR concludes that FPA would have a less-than-significant impact regarding flooding and groundwater impacts. However, the FPA PEIR also concludes that the FPA would have a potentially significant impact regarding impacts to wetlands. The FPA PEIR acknowledges that future development projects under the FPA would have the potential to change drainage patterns and surface runoff characteristics, such as runoff volume and rate. However, the land use amendments associated with the FPA would increase softscape acreage and reduce hardscape acreage relative to conditions existing at the time of FPA PEIR adoption, resulting in decreased impervious land surface and a net reduction in runoff volumes and rates. The FPA PEIR determines that only three out of 17 distinct drainage basins in the FPA area would experience higher runoff flow rates, and the increase would not be substantial.

Regarding flooding impacts, the FPA PEIR explains that compliance with the City's floodplain regulations and design requirements, including SDMC Section 143.0145, would reduce flood hazard impacts associated with future development projects in the FPA area. Regarding groundwater impacts, the FPA PEIR explains that groundwater recharge would potentially improve as a result of the reduction in impervious surfaces and the incorporation of Low Impact Development (LID) features (e.g., bio retention areas, pervious pavements) into future development projects, which is required by the City's Drainage Design Manual and Storm Water Standards Manual. Regarding wetlands impacts, the FPA PEIR explains that the FPA would cause an increase in runoff flow volumes for certain drainage basins, which could alter the functions and values of downstream wetland communities. The FPA PEIR provides Mitigation Measure HYD-1, which would reduce the impact to a less-than-significant level in these drainage basins. Mitigation Measure HYD-1 requires future development in the drainage basins listed above to be reviewed by City staff for potential runoff volume and peak flow rate impacts. At the discretion of City review, the future project may be required to prepare a project-specific hydrology study and water quality technical report that identifies specific mitigation measures to incorporate into project design and construction.

Section 5.7 Issue 2 analyzes the potential of the FPA PEIR to result in a substantial alteration to onsite and off-site drainage patterns due to changes in runoff flow rates or volumes. The FPA PEIR concludes that the FPA would have a less-than-significant impact because existing drainage patterns would be preserved, and there would be an overall decrease in drainage flow with implementation of the FPA. The FPA PEIR discussed that City guidelines would prohibit future development from diverting water from existing drainage courses, and future development projects would be reviewed by City staff.

Section 5.8 Issue 1 analyzes the potential of the FPA to result in a substantial increase in pollutant discharge to receiving waters and increase discharge of identified pollutants to an already impaired water body. The FPA PEIR concludes that the impact would be potentially significant but would be reduced to a less-than-significant level with implementation of Mitigation Measure HYD-1, described above. The FPA PEIR discusses that future development projects would be required to comply with applicable regulations and permits, including the requirements of the RWQCB and SDMC, the MS4 permit for the San Diego Region, the City's Storm Water Standards Manual, and the California BMP Handbook.

Overall impacts associated with Hydrology and Water Quality are determined to be mitigated to less than significant.

Project

Consistent with the mitigation framework, a drainage, stormwater, and hydraulics report (Tory R. Walker Engineering, 2024) and a Water Quality Technical memorandum (Dokken Engineering, 2024), were prepared for the project.

Per the drainage report, proposed storm water improvements would result in estimated water surface elevations for the existing and proposed conditions models that are nearly identical downstream of Fairmount Avenue. The expansion of the box culvert at Fairmount Avenue will increase the capacity; water surface elevations immediately upstream of the culvert will drop approximately 4 to 5 feet.

Per the Water Quality Technical Memorandum, the Project storm water drainage would be designed consistent with applicable local jurisdiction requirements and the Caltrans Project Planning and Design Guide and Storm Water Management Plan. As a result, the Project is not anticipated to produce long-term effects on turbidity.

Roadway runoff may contain oil, grease, petroleum products, zinc, copper, lead, cadmium, iron, and other trace metals, which could harm aquatic life. Accidental spills of petroleum hydrocarbons (fuels and lubricating oils) and/or concrete waste, are also a concern during construction activities, and would be avoided and minimized through the implementation of construction and water quality BMPs. An accidental release of these wastes could adversely affect surface water quality, vegetation, and wildlife habitat but the impact is expected to be acute and not cause a long-term impact. Such potential short-term construction impacts would be avoided and minimized through BMPs included in the Avoidance and Minimization Measure WQ-1. BMPs and Avoidance and Minimization Measures WQ-1 through WQ-3 are anticipated to minimize changes to the biological

characteristics of the aquatic environment. To further prevent impacts to Alvarado Creek and water quality, measures WQ-2 through WQ-5 would be incorporated during final design. Full text of Avoidance and Minimization Measures are in the Water Quality Technical Memorandum and would be included as conditions of the project.

The project proposes an increase in impervious surfaces through widening, new roadway areas, and roadway pavement replacement. The project is a Priority Development Project (PDP) and would require a Stormwater Quality Management Plan (SWQMP). The SWQMP would demonstrate compliance with PDP requirements of the City of San Diego BMP Design Manual and the regional MS4 permit. Due to right-of-way, useable land area, and utility constraints, a proprietary BMP, such as a Modular Wetlands System, is recommended for the project. A location hydraulics study (Tory R. Walker Engineering, 2024) was prepared for the project as the project encroaches upon the base (100-year) floodplain. The project would be constructed in the existing floodplain but would result in lower base flood elevations and a reduction in inundation area, due to the widening of the box culvert at the Fairmount Avenue crossing. As a result, flooding risks would be reduced with the project. Therefore, impacts related to surface runoff and alteration of drainage patterns would be less than significant.

As stated above, the project is considered a Priority Development Project. Therefore, a SWQMP would be prepared to identify and implement required structural BMPs for storm water pollutant control. With implementation of the proposed water quality and hydromodification management measures and BMPs, the project would meet performance standards and comply with applicable water quality regulations. Overall impacts associated with Hydrology and Water Quality are less than significant with mitigation incorporated.

Historical Resources

FPA PE/R

Section 5.9 of the FPA PEIR provides an analysis of impacts to historical resources associated with the implementation of the FPA.

Issue 1 analyzes the potential of the FPA to result in adverse physical or aesthetic effects to prehistoric, historic, or architecturally significant buildings, structures, objects, or sites. The FPA PEIR concludes that the impact would be potentially significant because future buildout of the FPA area would facilitate future development that has the potential to impact existing historic resources within the FPA area. The FPA PEIR identifies five parcels that contain potentially eligible historic resources in the City Register or California Register of Historic Resources (CRHR). The FPA PEIR provides Mitigation Measure HR-1, which requires future development occurring on any of these five parcels to conduct further evaluation of potentially eligible historical structures and provide site-specific mitigation, if needed. The FPA PEIR determines that implementation of Mitigation Measure HR-1 would reduce the impact to a less-than-significant level because any future development projects that may directly or indirectly impact a significant historic resource would be required to incorporate feasible mitigation measures adopted with certification of subsequent CEQA review.

Issue 2 analyzes the potential of the FPA to result in impacts to existing religious or sacred uses or disturb human remains, including those interred outside formal cemeteries. The FPA PEIR concludes

that the impact would be potentially significant because unknown human remains could be uncovered during construction activities for future development under the FPA. The FPA PEIR discusses that in the event that human remains are discovered during construction, all work shall cease immediately, and procedures outlined in the California Public Resources Code (Section 5097.98) and State Health and Safety Code (Section 7050.5) shall be followed. The FPA PEIR includes Mitigation Measure HR-2, which applies to projects subject to discretionary approval that could result in impacts to archaeological resources, requires these projects to determine the presence of any archaeological resources and provide mitigation for any significant resources that may be impacted by development activity. The FPA PEIR determines that the implementation of Mitigation Measure HR-2 would reduce the impact to a less-than-significant level.

Issue 3 analyzes the potential of the FPA to cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5. The FPA PEIR concludes that the impact would be potentially significant because archaeological resources could be uncovered during construction activities for future development under the FPA. However, with the implementation of Mitigation Measure HR-2, discussed above, the FPA PEIR determines that the impact would be reduced to a less-than-significant level.

Overall impacts associated with Historical Resources are determined to be mitigated to less than significant.

Project

Consistent with the mitigation framework, a site-specific Archaeological Survey report (Dokken Engineering, 2024) and Historic Property Survey Report (Dokken Engineering, 2024) were prepared for the project.

Based on the findings of the archaeological survey, there are no known archaeological resources, cultural resources, or historic buildings, structures, or objects within the project site. The Native American Heritage Commission (NAHC) was contacted to request a search of its Sacred Lands File. Letters were sent to the tribal contacts provided by the NAHC. To date, one response has been received. Viejas Band of Kumeyaay Indians responded that there are known cultural resources within or adjacent to the project area. The tribe requested that a Kumeyaay cultural monitor be on site for all ground-disturbing activities and to be informed of any new developments such as inadvertent discovery of cultural artifacts, cremation sites, or human remains. Therefore, the City would bring forward cultural resource monitoring as a project-specific mitigation measure.

No known burial sites or cemeteries exist within the project site, and it is not expected that unknown human remains would be discovered during construction. In the unlikely event of the discovery of human remains during project grading, work shall halt, and the procedures set forth in the California Public Resources Code (Section 5097.98) and Health and Safety Code (Section 7050.5) shall be undertaken.

The Historic Property Survey Report identified four parcels and a segment of Alvarado Creek that would be directly impacted by the project. The identified resources were deemed not eligible for listing due to a lack of historic significance and a lack of historic integrity. In addition, the FPA PEIR Mitigation Measure HR-1 is not applicable to the project because the project site is not located on or

adjacent to any of the five potentially eligible historic resource parcels identified in the FPA PEIR. For these reasons, the project would have a less-than-significant impact on historic resources.

Overall, the project would result in impacts to cultural resources; therefore, a Mitigation Monitoring and Reporting Program, as detailed in Section VIII of the Addendum, would be implemented. With the implementation of the cultural resources monitoring program, potential impacts on cultural resources would be reduced to below a level of significance.

Visual Effects and Neighborhood Character

FPA PEIR

Section 5.10 of the FPA PEIR provides an analysis of visual effects and neighborhood character impacts associated with the FPA.

Issue 1 analyzed the potential of the FPA to create a substantial obstruction of any vista or scenic view from a public viewing area. The FPA PEIR concludes that the FPA would have a less-than-significant impact because the Navajo Community Plan does not identify any public viewsheds; future development consistent with the FPA would potentially open up various view corridors within the community that are currently blocked by industrial and commercial development, and future development under the FPA would be required to comply with the development standards of the LDC, General Plan Urban Design Element, Navajo Community Plan, and the San Diego River Park Master Plan.

Issue 2 analyzes the potential of the FPA to create a negative aesthetic. The FPA PEIR concludes that potential impacts to visual character and quality would be less than significant because the FPA area is predominantly commercial and industrial in nature. Implementation of mixed-use and transit-oriented development would not substantially degrade the existing visual environment and would instead promote a more pedestrian-oriented urban form with landscaping and hardscaping features consistent with applicable public realm design standards. In addition, the FPA PEIR discusses how the FPA would provide the opportunity to benefit the aesthetic appearance of the Grantville community area by supporting future development projects that would provide updated, modern buildings and structures that would be required to comply with the development standards of the LDC, General Plan Urban Design Element, supplemental design regulations of the Navajo Community Plan (Grantville CPIOZ Section), and the San Diego River Park Master Plan.

Issue 3 evaluates the compatibility of the FPA with surrounding development in terms of bulk, scale, materials, and style. The FPA PEIR determines that impacts would be less than significant. While implementation of the FPA would alter the existing bulk, scale, materials, and style of development by reducing commercial and industrial uses and introducing more mixed-use and pedestrian-oriented residential uses, these changes would improve consistency with adjacent residential and institutional land uses. In addition, all future development within the FPA would be subject to applicable City design regulations and development standards, ensuring compatibility with the surrounding community.

Issue 4 analyzes the potential of the FPA to cause a substantial alteration to the existing or planned character of the area. The FPA PEIR concludes that the impact would be less than significant because

future development under the FPA would provide a benefit to the neighborhood character due to the FPA's goal to create a walkable, bikeable, mixed-use, transit-oriented neighborhood with wide, enhanced sidewalks, streetscape furnishings, and bicycle amenities.

Issue 5 analyzes the potential of the FPA to create a substantial amount of light and glare that would adversely affect daytime or nighttime views. The FPA PEIR concludes that the impact would be less than significant because although the FPA allows for future development that would involve new sources of light and glare, all future development would be required to comply with City development standards that address lighting, including those in the LDC.

Overall impacts associated with Visual Effects and Neighborhood Character are determined to be less than significant.

Project

The Navajo Community Plan does not identify any public viewsheds in the area that could be affected by the project but does acknowledge that scenic resources exist within the plan area in open space and recreational areas. The project would widen an existing roadway and realign a road. The realignment would occur over Alvarado Creek. There are no existing public views of Alvarado Creek that could be affected by the project; therefore, the project would result in a less-than-significant impact regarding public views.

As discussed above, the project would replace and redesign existing road infrastructure and existing land uses in the project vicinity are primarily industrial and commercial. Therefore, the project would have a less-than-significant impact regarding negative aesthetic, neighborhood character, and development incompatible with surrounding development. Consistent with the FPA PEIR, the project would be required to comply with City development standards that address lighting and glare, including those in the LDC. Therefore, the project would have a less-than-significant impact regarding light and glare.

Geologic Conditions

FPA PEIR

Section 5.11 of the FPA PEIR provides an analysis of geology and soil impacts associated with the implementation of the FPA.

Issue 1 analyzes the FPA's potential to expose people or property to geologic hazards, including earthquakes, tsunamis, landslides, mudslides, flooding, expansive or corrosive soils, and liquefaction. The FPA PEIR concludes that the FPA would have no impact regarding tsunamis and would result in a less-than-significant impact associated with all other geologic hazards because all new development in the FPA area would be required to comply with the requirements of the LDC and the California Building Code (CBC).

Issue 2 analyzes the potential of the FPA to result in a substantial increase in soil erosion from wind or water. The FPA PEIR concludes that the FPA would have a less-than-significant impact because future development projects would be required to comply with the SDMC, NPDES General

Construction Storm Water Permit and MS4 storm water Permit. Additionally, certain projects would be required to prepare and implement a Stormwater Pollution Protection Plan (SWPPP) and BMPs.

Issue 3 analyzes hazards associated with geologic instability, such as seismically induced landslides, liquefaction, and seismically induced settlement. The FPA concludes that the impact would be potentially significant because some portions of the FPA area have low to moderate risk for landslides; parcels near the San Diego River and Alvarado Creek may have a moderate to high potential for liquefaction; and the FPA area is underlain by fill, young alluvium, and young colluvium that may be subject to settlement under foundational loads. However, the FPA PEIR determines that implementation of Mitigation Measure GC-1, as well as compliance with the SDMC and the CBC would reduce the impact to a level less than significant. Mitigation Measure GC-1 requires geologic hazards to be mitigated at the project-level through adherence to the City's Seismic Safety Study and recommendations presented in a site-specific geotechnical report prepared in accordance with the City's Geotechnical Report Guidelines. Overall impacts associated with Geologic Conditions are determined to be mitigated to less than significant.

Project

FPA PEIR Mitigation Measure GC-1 is applicable to the project. A preliminary Geotechnical Design Report was prepared for the project to provide preliminary geotechnical design recommendations based on evaluation of geologic hazards, existing site conditions, and seismicity of the project site location. (Atlas Technical Consultants LLC, 2023). A final report would be required as part of project design.

The Preliminary Geotechnical Design Report determined that the project site is not underlain by an active fault and is not located within an Earthquake Fault Zone. The Newport-Inglewood-Rose Canyon Fault Zone is the closest active fault zone to project and is located approximately 5.4 miles west/southwest from the site. Therefore, the risk associated with fault rupture and ground shaking is considered low. As discussed in the FPA PEIR, there are no potential impacts associated with tsunamis in the FPA area due to its inland location and elevation. The project site is located within the FPA area and, thus, would not be at risk of inundation by tsunami. The project would adhere to the SDMC to ensure that potential impacts associated with landslides, mudslides, flood hazards, and corrosive soils would be less than significant.

Based on the results of the Preliminary Geotechnical Design Report, risks associated with geologic hazards would be adequately addressed with the preparation of a project-specific geotechnical exploration program. Final design recommendations would then be provided upon completion of the project-specific subsurface exploration program. The project would implement final design recommendations and ensure compliance with the SDMC.

Regarding erosion, a site-specific SWQMP would be prepared, which would require the project to implement best management practices (BMPs) in accordance with the performance standards documented in the City's Storm Water Standards Manual. Therefore, impacts related to erosion would be less-than-significant.

The project site is in an area designated as a Liquefaction Hazard Zone. Considering the soils at the site are liquefiable, the potential for lateral spreading exists. Therefore, site specific liquefaction

analysis and recommended mitigation measures, if needed, would be developed and presented in Geotechnical Design Report after project-specific subsurface explorations are performed.

It is expected that construction of the approach embankment will likely create time-dependent settlements of the embankment and its foundation materials. A design that minimizes this post construction settlement is essential. The amount and rate of settlement should be evaluated. Therefore, as a condition of the project, settlement of the embankments would be monitored during the construction, and the bridge structure construction would not start until the embankment settlement is completed.

The depth of groundwater in the general vicinity of the new bridge area is expected to be approximately 12 feet below the ground surface. Considering the presence of cohesionless soils in this area, a liquefaction assessment is recommended to be performed.

Additionally, liquefaction-induced lateral spreading analysis would be required due to the presence of free boundary surfaces on both sides of Alvarado Creek within the proposed bridge area. In case where the results of the analysis show the likelihood of liquefaction, the impact of seismic settlement on the structure of the bridge would be evaluated. Liquefaction settlement could create negative friction or downdrag on the deep foundations, which should be considered in the design capacity of the piles. If lateral spreading is likely to occur based on the analysis results, the effect of the lateral movement of the soils should be considered on the bridge structure and on the design of the piles.

Stability of permanent slopes should be evaluated after completion of liquefaction analysis. For preliminary planning purposes, it can be assumed that permanent cut or fill slopes constructed 2:1 (horizontal: vertical) or flatter are generally stable. Permanent fill slopes steeper than 2:1 will need to be reinforced with geogrid to have an adequate factor of safety. The engineering geologist should observe all cut slopes during grading to ascertain that no unforeseen adverse conditions requiring revised recommendations are encountered.

A final geotechnical report that includes all recommended analyses would be required in accordance with mitigation measure GC-1, including project-specific subsurface explorations, minimization of post-construction settlement, a liquefaction assessment, lateral spreading analysis, and evaluation of slope stability. Observation by an engineering geologist would be included as a condition of the project. Implementation of final design recommendations and mitigation measure GC-1 would reduce impacts related to geologic stability to less than significant.

Paleontological Resources

FPA PEIR

Section 5.12 of the FPA PEIR provides an analysis of impacts to paleontological resources associated with implementation of the FPA. The following soils were determined to occur within the FPA:

• Fill: Existing fills in the proposed FPA area are expected to consist of engineered and undocumented fills, derived from nearby formational and surficial units. Fill soils can vary from clay to sand, depending on the parent material. The compaction of the fills can vary

considerably, ranging from loose to dense.

- Qya: Young Alluvial Flood-Plain Deposits (Holocene and late Pleistocene) Qya consists of poorly sorted, poorly consolidated, permeable flood-plain deposits of sand, silt, or clay.
 Scattered layers of gravel and cobbles are also likely to be present within the alluvium. The alluvium is generally in a loose condition and much of it would be subject to liquefaction below the water table. In developed parts of the western portion of the proposed FPA area, alluvium is likely to be present below existing fill soils.
- Qoa: Old Alluvial Flood-Plain Deposits (late to middle Pleistocene) Qoa consists of poorly sorted, well-consolidated, permeable, commonly slightly dissected gravel, sand, silt, and clay.

The FPA PEIR concludes that there are no geologic formations with a high or moderate sensitivity rating for paleontological resources within the FPA. Implementation of the FPA would not impact any sensitive geologic formations, and potential for impact is less than significant.

Project

Per the City's General Grading Guidelines for Paleontological Resources and Significance Determination Thresholds, monitoring would be required for projects with over 1,000 cubic yards of excavation in a high resource potential geologic formation or over 2,000 cubic yards of excavation in a moderate resource potential formation at a depth of 10 feet or greater, or within proximity to known fossil sites. Review of Figure 5.11 of the Grantville FPA Final PEIR identified that no medium or high sensitivity geologic formations occur within the study area. Therefore, the project area does not contain any sensitive geologic formations, and potential for impact would be less than significant.

Health and Safety

FPA PEIR

Section 5.13 of the FPA PEIR provides an analysis of health and safety impacts associated with the implementation of the FPA.

Issue 1 analyzes the potential of the FPA to expose people or structures to significant risk of loss, injury, or death involving wildland fires. The FPA PEIR concludes that the impact would be potentially significant because portions of the FPA area in the north, west, and southeast are located within a Very High Fire Hazard Severity Zone (VHFHSZ), and future development under the FPA would occur in these areas. However, the FPA PEIR determines that the impact would be reduced to a less-than-significant level with the implementation of Mitigation Measure HS-1, which requires new development to incorporate fire risk reduction measures in accordance with the LDC Landscape Standards and in compliance with the California Fire Code and CBC.

Issue 2 analyzes the potential of the FPA to result in hazardous waste emissions or the handling of hazardous materials, substances, or waste within a quarter mile of a school. The FPA PEIR concludes that the impact would be potentially significant because several schools exist within the FPA area, and future development activities could potentially expose schools to hazardous materials and

waste. However, the FPA PEIR determines that implementation of Mitigation Measures HS-2 through HS-12, described below, would reduce this impact to a less-than-significant level because these measures would reduce the likelihood of and risk associated with the accidental release of hazardous materials and waste.

Mitigation Measure HS-2 requires property-specific due diligence processes to be conducted by a qualified environmental professional in accordance with applicable guidelines and regulations, including a Phase 1 Environmental Site Assessment (ESA). Mitigation Measure HS-3 requires properties with suspected or documented soil and/or groundwater contamination to conduct further evaluation, such as a Phase II ESA and/or remediation activities. Mitigation Measure HS-4 requires 'case closure' regulatory status to be reevaluated by a qualified environmental professional in conjunction with the applicable regulatory agency prior to the start of future development activities. Mitigation Measure HS-5 requires properties with suspected or documented impacts to soil and/or groundwater to implement appropriate worker and community health safety measures under the oversight of a qualified environmental professional during soil/groundwater disturbance activities. Mitigation Measure HS-6 requires certain precautions to be observed during excavation activities to avoid impacts from any contaminated soil and/or groundwater not identified during preconstruction technical studies. Mitigation Measure HS-7 requires chemical characterization of any soil generated during construction activities at contaminated properties prior to reuse, export, or disposal. Mitigation Measure HS-8 requires further assessment performed by a qualified environmental professional if discolored soil or other potential environmental issues are encountered during construction. Mitigation Measure HS-9 requires development of impacted or potentially impacted properties involving soil disturbance to implement a soil and groundwater management plan. Mitigation Measure HS-10 regulates construction that would involve groundwater dewatering activities. Mitigation Measure HS-11 requires projects involving renovation or demolition of structures to conduct a survey prior to construction activities that identifies the presence of hazardous building materials (e.g., asbestos, lead) and provides appropriate abatement measures. Mitigation Measure HS-12 requires that projects involving the demolition of structures built in the 1970s or earlier analyze surface and shallow soils for lead and termiticides prior to demolition or soil disturbance.

Issue 3 analyzes the potential of the FPA to impair the implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. The FPA PEIR concludes that the impact would be less than significant because future development under the FPA would be consistent with the Navajo Community Plan and, thus, would not involve the closure of evacuation routes or interfere with an emergency response plan.

Issue 4 analyzes existing hazardous material sites located within the FPA area that could create a significant hazard to the public or environment. The FPA PEIR concluded that the impact would be potentially significant because hazardous material and waste may exist within the FPA area that could be disturbed during future development construction activities. The impact was reduced to a less-than-significant level with implementation of Mitigation Measures HS-2 through HS-12, discussed above.

Issue 5 analyzes the potential of the FPA to expose people to toxic substances, such as pesticides and herbicides, applied to the soil during previous agricultural uses. The FPA PEIR concludes that, based on the historical urban development of the FPA area and length of time since the area was

used for agricultural purposes, future development under FPA would not likely expose people to residual agricultural contaminants. However, if any harmful agricultural contaminants exist in the soil in the FPA area, such contaminants could be released and people could be exposed, which is a potentially significant impact. However, the FPA PEIR determines that implementation of Mitigation Measures HS-2 through HS-12, discussed above, would ensure that future development projects do not expose people to these toxic substances, reducing the impact to a less-than-significant level. Overall impacts associated with Health and Safety were determined to be mitigated to less than significant.

Project

The project site is located within a designated Very High Fire Hazard Severity Zone. The project would be designed in accordance with the LDC Landscape Standards and in compliance with California Fire Code and CBC, as required by FPA PEIR Mitigation Measure HS-1.

Based on a review of the project area, no schools are located within a quarter mile of the project site. The project would also implement all applicable mitigation measures as they apply to the site, including the preparation of a Phase II Site Assessment, and implementation of any project-specific mitigation measures identified within the document. Project construction may require the use of small amounts of common solvents and petroleum products, which are routinely used in construction. However, these materials are not acutely hazardous and would be used in small quantities. Therefore, the project would not result in hazardous emissions or handling acutely hazardous materials within a quarter mile of a school, and this impact would be less than significant.

The project would prepare a traffic control plan to be approved by the City that would require that the lane closures not impede emergency response or evacuation. Therefore, the project would have a less-than-significant impact on evacuation corridors and emergency response routes.

Reviews of the State Water Resources Control Board Geotracker and Department of Toxic Substances Control (DTSC) Envirostor databases were performed. There are multiple listed sites located within 1,000 feet of the project site. The cleanup statuses of all the listed sites are closed. Due to the closed status of these sites, the project is not anticipated to disturb or release existing hazardous materials or waste into the environment.

Based on the Historic Context report prepared for the FPA PEIR, Grantville remained a small, rural agricultural community from the 1880s until the early 1950s. Road improvements between 1947 and 1955 indicate some growth in the community with an extension of Fairmount Avenue to Sheridan Lane as well as side streets that provided access to many new buildings at the corner of Fairmount and Twain Avenues, including several industrial or commercial buildings. New buildings were constructed north of Twain Avenue and east of Fairmount Avenue as well as at Fairmount Avenue and Sheridan Lane. Buildings were also constructed north of the new four-lane Interstate 8, east of Fairmount Avenue, and southeast of present-day Mission Gorge Road. Based on review of historic aerials, development of the present-day intersection design was completed by 1964. Due to the historic redevelopment, the potential for project construction to release toxic contaminants such as pesticides and herbicides into the environment is low.

As discussed above, a Hazardous Waste Initial Site Assessment was prepared for the project in accordance with the mitigation framework. The document identified four potential recognized environmental conditions in connection with the site. The project would be required to implement FPA PEIR Mitigation Measure HS-3. A limited Phase II Site Assessment would be prepared prior to construction as required by the Initial Site Assessment. The project would be required to implement any site-specific mitigation measures identified within the document, which would also include FPA PEIR Mitigation Measures HS-4, HS-5, HS-7, HS-9, and HS-10. The project would be required to implement FPA PEIR Mitigation Measures HS-6 and HS-8, which require that specified precautions and further assessment be performed during construction if previously unknown contaminated soil or groundwater is encountered during excavation or other construction activities. As the project would require the demolition of existing structures, the project would implement FPA PEIR Mitigation Measures HS-11 and HS-12. Potentially significant impacts related to encountering contaminated soil or groundwater during construction would be reduced to less than significant with mitigation.

Public Services

FPA PEIR

Section 5.14 of the FPA PEIR provides an analysis of impacts to public services and facilities from FPA implementation. Public services and facilities include police, fire rescue, libraries, parks, schools, roadways, and recreational facilities, all of which were analyzed under Issue 1.

Regarding police services and facilities, the FPA PEIR concludes that impacts related to the construction of police facilities would be less-than-significant. The FPA PEIR determines that the increase in residential dwelling units under the FPA would likely result in increased numbers of calls for service. However, the construction of any new facilities or expansion of existing facilities that may be required as a result of future actions not associated with the FPA would be subject to further environmental review.

The FPA PEIR determines that it is not anticipated that additional fire stations would be necessary. In addition, expansion of Fire Station 31, which is the primary responding unit for fire hazards in the FPA area, or the development of a new fire rescue facility, would be subject to separate environmental review. Therefore, the FPA PEIR concludes that impacts related to the construction of fire protection facilities would be less than significant.

With respect to library services, the FPA PEIR concludes that the Allied Gardens/Benjamin Library and the Mission Valley Library have sufficient capacity to accommodate the anticipated increase in population under the FPA. Therefore, implementation of FPA would not result in the need for new or physically expanded library facilities, and the impacts would be less than significant.

The FPA PEIR identifies that new parks would be required in the FPA area in order to meet the increased demand associated with the buildout of the FPA. At buildout, the Navajo Community population will require approximately 204 acres of population-based parks, and the Navajo PFFP identified several potential park and recreation facilities that will be scheduled once funding sources are secured. Any future development in the FPA area would be required to contribute a proportionate fair-share to the construction of park and recreational facilities, as identified in the

Navajo Community Plan, through the mandatory payment of Development Impact Fees (DIFs). In addition, the construction of any new park and recreation facilities would be subject to environmental review pursuant to CEQA. Therefore, the FPA PEIR concludes that impacts related to the construction of new park and recreation facilities within the FPA area would be less than significant.

The FPA PEIR determines that FPA buildout would place additional demands on school services because the increase in population in the FPA area would potentially result in increased student enrollment. Between the six San Diego Unified School District (SDUSD) schools that serve the FPA area, there would likely not be enough capacity available to serve the anticipated increase in student population, and the development of new schools could be required. The FPA PEIR explains that the school district will be responsible for potential expansion or development of new facilities, and subsequent projects would be subject to environmental review by SDUSD. The FPA PEIR determines that payment of the statutory fee, pursuant to Senate Bill 50, by future projects consistent with FPA would mitigate the impact associated with increased demand for schools because of the provision that the statutory fees constitute full and complete mitigation. Therefore, impacts to schools resulting from future development under the FPA were concluded to be less than significant.

The FPA PEIR determines that increased traffic volumes would potentially affect roadway conditions on heavily used roadway segments. However, the Grantville Community Plan Implementation Overlay Zone (CPIOZ) Type A designation within the FPA area provides regulations and guidelines regarding transit-oriented development, which would reduce reliance on automobiles for transportation to, from, and within the FPA area. Therefore, the FPA PEIR concludes that impacts associated with roadway maintenance would be less than significant.

Overall impacts associated with Public Services are determined to be less than significant.

Project

The project is limited to the realignment of an existing road, and the widening of segments of Fairmount Avenue, consistent with the Navajo Community Plan.

The project would not construct any structures that would require fire protection services or result in an increase in population that would require police protection, schools, park and recreation facilities, libraries, and other public services. Therefore, the project would not require any new or altered public services and/or facilities. No impact would occur.

Public Utilities

FPA PEIR

Section 5.15 of the FPA PEIR evaluates potential impacts on public utilities that may occur through development of the FPA.

Issue 1 analyzes the potential of the FPA to result in the need for new systems or require substantial alterations to existing utilities, including water, sewer/wastewater, storm water, and solid waste. The FPA PEIR concludes that impacts related to water and sewer/wastewater services would be less than

significant because water and sewer/wastewater infrastructure already exists in the area, there is sufficient water supply to serve the FPA's future water demands, the FPA would not require new facilities to be constructed, and existing water and sewer/wastewater facilities would be able to meet demand from implementation of FPA. The FPA PEIR acknowledges that future development under the FPA would have the potential to require the alteration of water, sewer/wastewater facilities. However, the FPA PEIR determines that these foreseeable alterations would not be substantial in nature.

The FPA PEIR concludes that the impact regarding storm water management and infrastructure would be potentially significant but reduced to a less than significant level with the implementation of Mitigation Measure HYD-1. As discussed in the Hydrology and Water Quality section of this Addendum, Mitigation Measure HYD-1 requires future development located within certain drainage basins (SD-1, SD-2, and A-1) to be reviewed by City staff and, in some cases, prepare a project-specific hydrology study for approval by the City. The FPA PEIR determined that implementation of Mitigation Measure HYD-1, as well as compliance with the requirements in the SDMC and adherence to the California Best Management Practice (BMP) Handbook, all potential impacts from storm water runoff would be fully minimized.

The FPA PEIR concludes that impacts related to solid waste disposal would be potentially significant but reduced to less than significant with the implementation of Mitigation Measure PU-1. The FPA PEIR discusses that implementation of the FPA would increase the solid waste disposal needs of future residents and businesses. However, future development would be required to comply with the City's Refuse and Recycle Materials Storage Regulations, the Recycling Ordinance, and the Construction and Demolition Debris Deposit Ordinance, among others. Future development that would generate 60 tons or more of solid waste would be required to implement Mitigation Measure PU-1, which requires these projects to prepare a Waste Management Plan (WMP) to be approved by the Environmental Services Department.

Issue 2 analyzes the potential of the FPA to result in the use of excessive amounts of fuel or energy (e.g., natural gas), power, or water. The FPA PEIR concludes that the impact would be less than significant. The FPA PEIR recognizes that future development of the FPA area would increase the demand for water services, fuel, energy, and power. However, the FPA PEIR discussed that future development would be subject to project-specific environmental review and would be required to comply with all applicable City regulations, standards, and guidelines, as well as mandatory state and regional regulations requiring the utilization of energy conservation measures. In addition, the CPIOZ Type A designation adopted by the FPA would result in expanded transit-oriented development, thus reducing fuel consumption.

Issue 3 analyzes the potential of the FPA to predominantly use non-drought-resistant vegetation in landscaping. The FPA PEIR concludes that there would be no impact because future development would be required to comply with the applicable policies of the General Plan and the City's Landscape Standards, which require the use of drought-resistant species in landscaping.

Overall impacts associated with Public Utilities were determined to be mitigated to less than significant.

Project

The project is limited to the realignment of Alvarado Canyon Road and the widening of segments of Fairmount Avenue consistent with the Grantville FPA. The project would not construct any structures that would require public utility services, and the widened segments and realignment would serve future growth that was already anticipated within the Grantville FPA. Consequently, the project would be consistent with growth projections that were utilized to forecast demand for sewer and water service, which was analyzed in the FPA Grantville PEIR. Therefore, the project would not increase demand for sewer and water service within the service area that would necessitate the construction of new facilities.

The Hydrology and Water Quality discussion in this addendum discusses the project's effects on storm water infrastructure, as further detailed in the Drainage Study and Water Quality Technical Memorandum prepared for the project. As detailed in the project-specific mitigation *Prj-Hyd-1*, a final Storm Water Quality Management Plan (SWQMP) would be prepared and approved by the City.

The FPA PEIR requires the preparation of a waste management plan if the thresholds are exceeded for solid waste. The project would result in the demolition of approximately 28,500 SF commercial building space, which would be less than the 40,000 SF threshold (the estimated equivalent to the generation of 60 tons of solid waste) in the City's CEQA Significance Determination Thresholds. Additionally, the project would not introduce any structures that could generate solid waste once the project is in operation. Therefore, impacts related to solid waste disposal would be less than significant.

Agricultural and Mineral Resources

FPA PEIR

The FPA PEIR addresses Agricultural and Mineral Resources associated with the FPA PEIR in Chapter 9, Effects found Not to be Significant, and concludes that there would be no impact to Agricultural and Mineral Resources. The FPA area is urbanized and has no forestland, timberland, Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. In addition, the FPA area is not zoned for agriculture and is not under a Williamson Act contract.

Regarding mineral resources, the southwestern portion of the FPA area, adjacent to the San Diego River, is in Mineral Resource Zone (MRZ) 2, while the northeastern portion of the FPA area is in MRZ-3. MRZ-2 areas are considered to have extractable aggregate deposits, and MRZ-3 areas are considered to contain mineral deposits that may qualify as mineral resources. However, the FPA area is urbanized, and the potential for loss of mineral deposits due to further development is low.

Overall impacts associated with Agricultural and Mineral Resources were determined to result in no impact.

Project

The project site does not contain any forestland, timberland, Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. In addition, the project site is not zoned for agriculture and is not under a Williamson Act contract. According to the California Geological Survey Open File Report

96-04 used in the FPA PEIR, the project site is in MRZ-2. The project would not involve the extraction of any mineral resources, and all disturbed soil would be reused onsite. In addition, most of the site is developed or disturbed, and thus, the potential for loss of mineral deposits due to development is low. Therefore, there would be no impact to agricultural and mineral resources.

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 EIR. The certified PEIR determined that the Grantville FPA would have no impacts to Agricultural Resources and Mineral Resources. Revisions to the project components evaluated under the PEIR are proposed for 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 to 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 FPA PEIR concludes that the project would result in significant and unavoidable environmental impacts for land use (noise compatibility), air quality, noise (operational), and transportation/ circulation. The following issue areas were determined to be potentially significant but reduced to below a level of significance with mitigation: Noise (Construction), Biological Resources, Hydrology/ Water Quality, Historical Resources (Built Environment and Archaeological), Geologic Conditions, Health and Safety, and Public Utilities (Solid Waste). Impacts for the following issue areas were determined to be less than significant: Greenhouse Gas Emissions, Paleontological Resources, Visual Quality/Neighborhood Character, Public Services and Facilities, Agricultural and Forest Resources, Mineral Resources, and Population and Housing. Regarding cumulative impacts, the implementation of the FPA Final PEIR would result in significant impacts related to land use (related to noise), transportation/circulation, air quality and odor, and noise impacts, which would remain significant and unmitigated.

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 FPA 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 Final PEIR, new CEQA Findings and/or Statement of Overriding Considerations are not required.

The project would not result in any new significant impacts, nor would it result in an increase in the severity of significant impacts identified in the previously certified FPA PEIR.

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

The project shall be required to comply with the mitigation measures outlined within the MMRP of

the previously certified PEIR No. 346289/SCH No. 2013111017, as applicable, and those identified as project-specific mitigation further detailing implementation outlined under the applicable PEIR framework mitigation measure in Attachment A.

IX. CERTIFICATION

Copies of the addendum, the certified PEIR, and the MMRP may be accessed on the City's CEQA webpage at: https://www.sandiego.gov/ceqa/final.

Jamie Kennedy Date of Final Report

Senior Planner

Engineering and Capital Projects Department

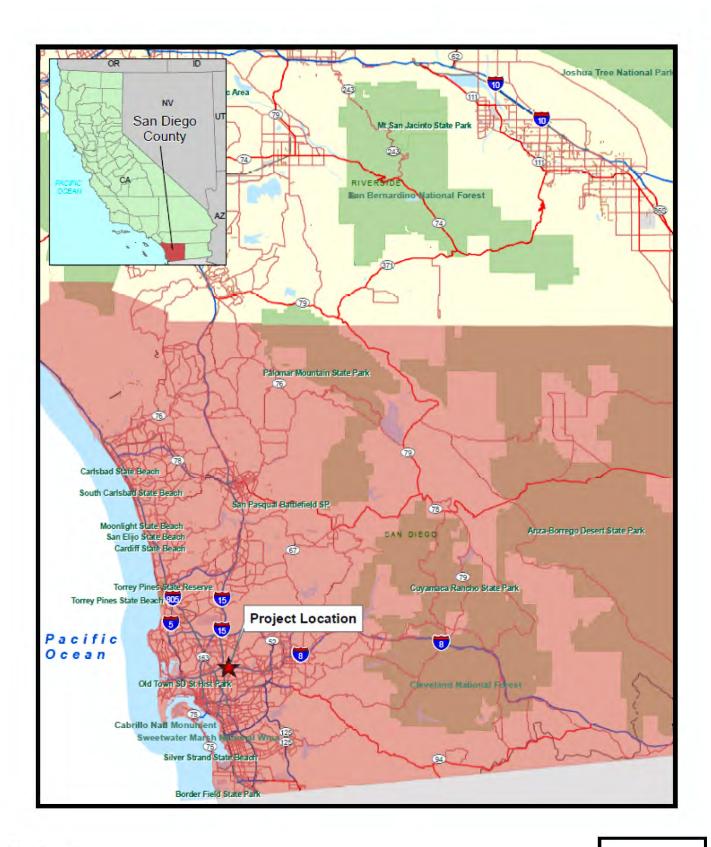
Analyst: Marissa Mariscal, Jamie Kennedy

Attachments: Figure 1: Regional Map

Figure 2: Vicinity Map Figure 3: Project Features

Figure 4: Preliminary Design Plans

Attachment A: Mitigation, Monitoring and Reporting Program



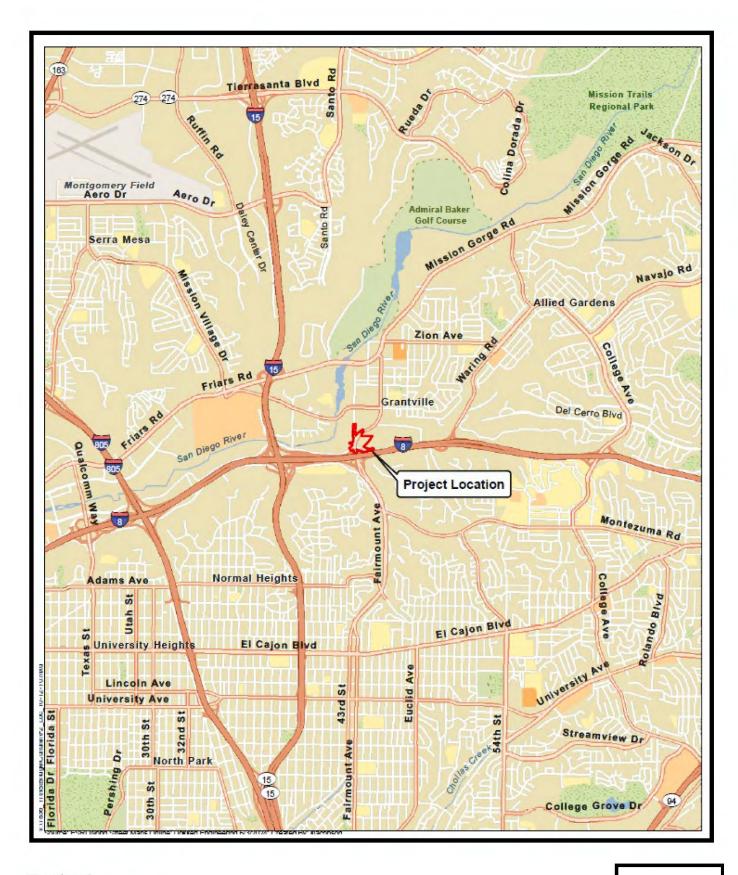


Project Vicinity Map,

Alvarado Canyon Road Alignment, WBS # S-22005

Engineering & Capital Projects Department

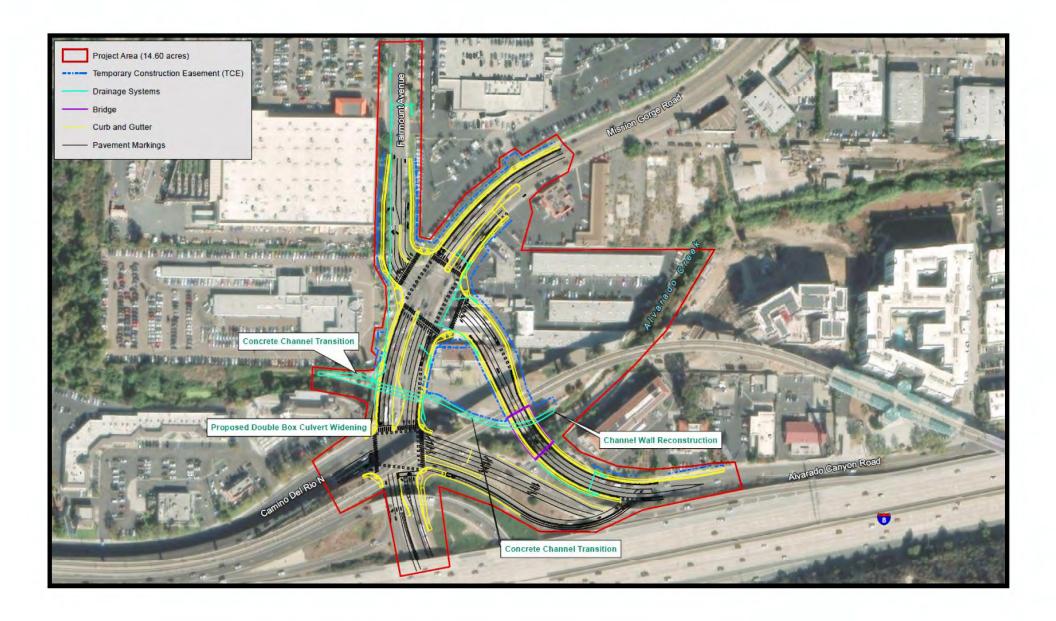
FIGURE No. 1





Project Location Map,
Alvarado Canyon Road Alignment, WBS # S-22005
Engineering & Capital Projects Department

FIGURE No. 2





Project Site Plan,
Alvarado Canyon Road Alignment, WBS # S-22005
Engineering & Capital Projects Department

FIGURE No. 3

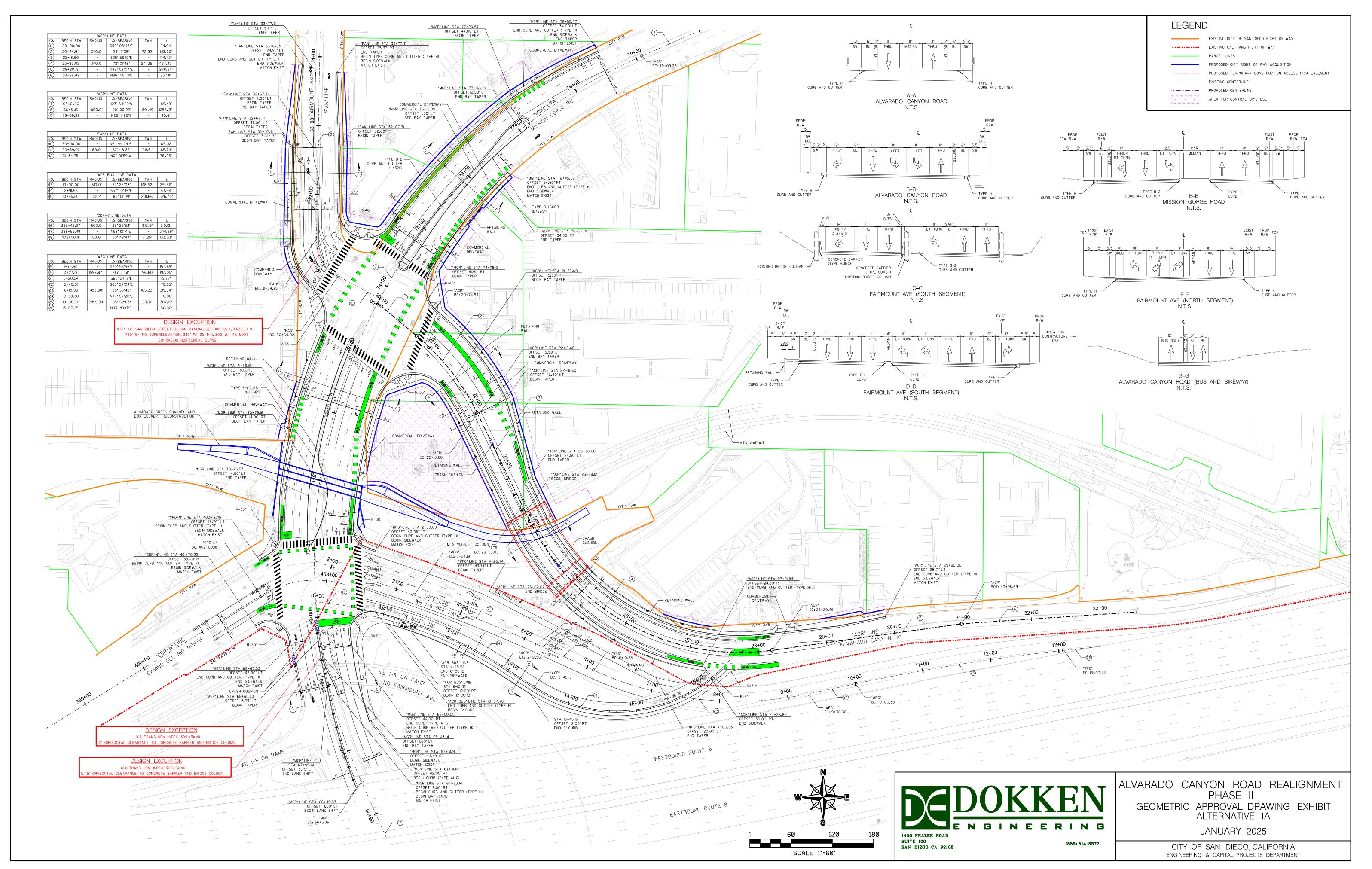


Figure 4 Preliminary Design Plans

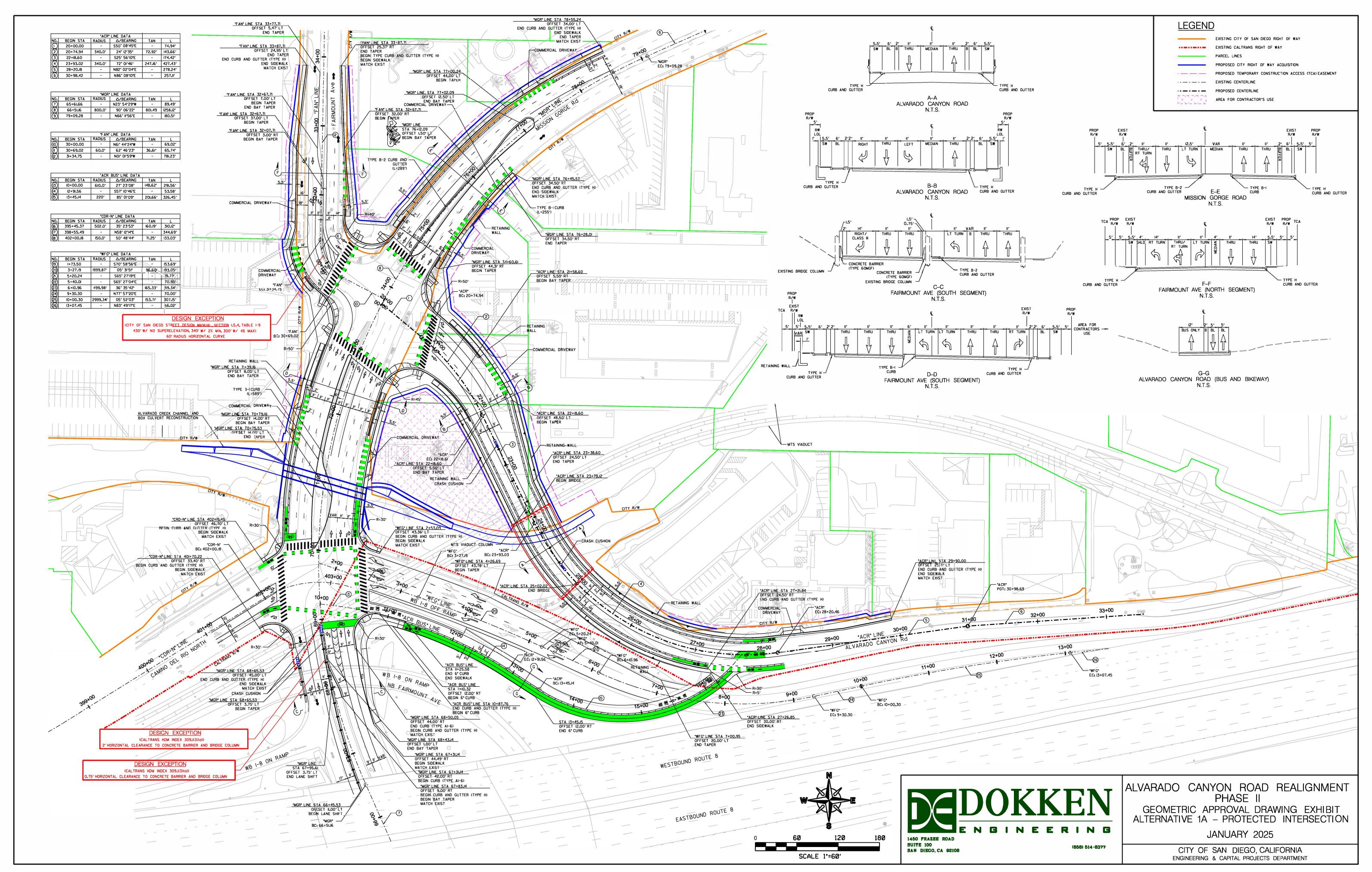


Figure 4 Preliminary Design Plans

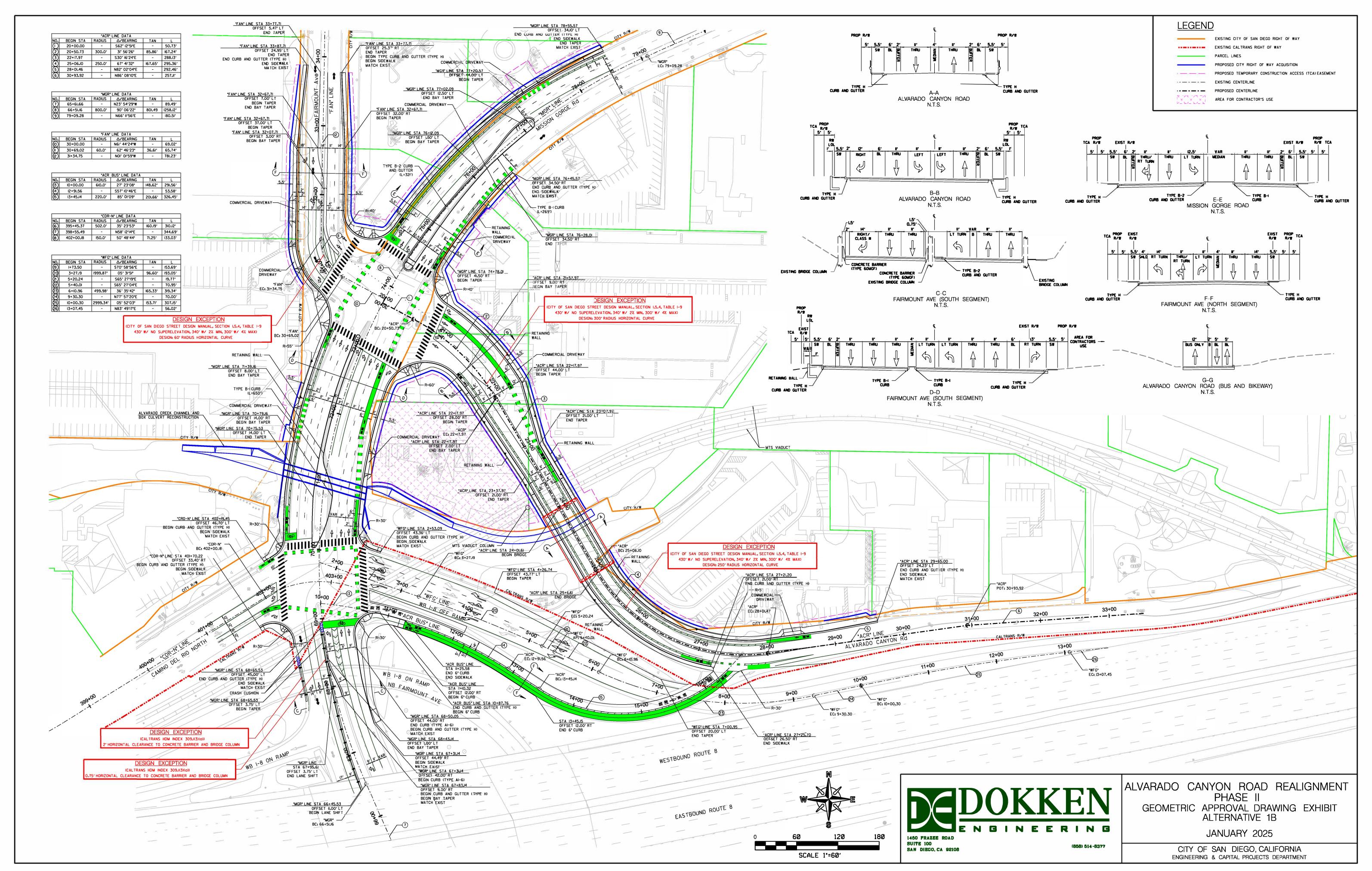


Figure 4 Preliminary Design Plans

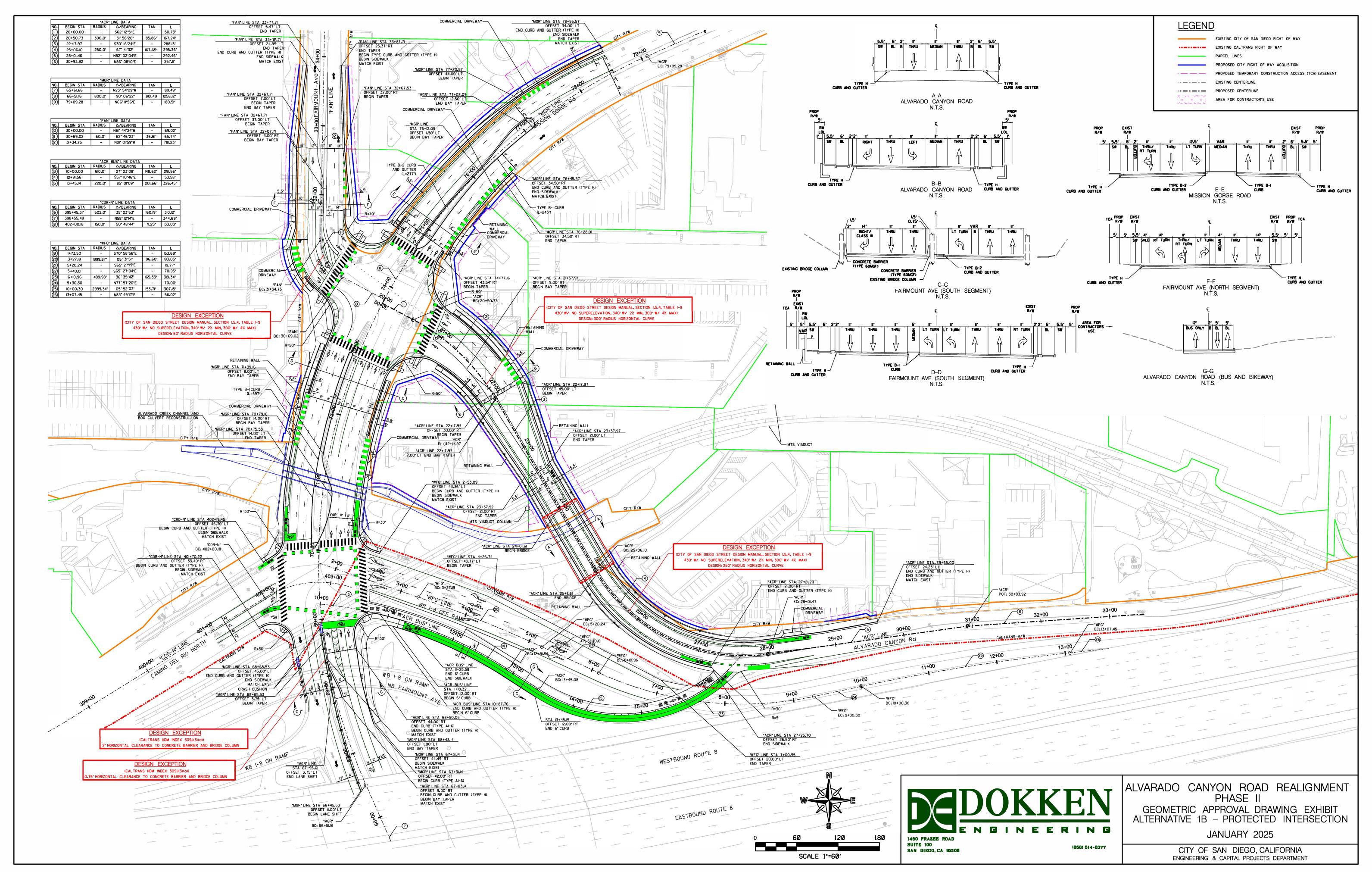


Figure 4 Preliminary Design Plans

Attachment A MITIGATION, MONITORING, AND REPORTING PROGRAM (MMRP) INCORPORATED INTO THE PROJECT

The project shall be required to comply with the mitigation measures outlined within the MMRP of the previously certified PEIR No. 346289/SCH No. 2013111017, as applicable, as well as those identified as project-specific mitigation further detailing implementation outlined under the applicable PEIR framework mitigation measure in *italics*.

AIR QUALITY AND ODOR

AQ-1 For projects that would exceed daily construction emissions thresholds established by the City of San Diego, best available control measures/technology shall be incorporated to reduce construction emissions to below daily emission standards established by the City of San Diego. Best available control measures/technology shall include:

- Minimizing simultaneous operation of multiple pieces of construction equipment;
- Use of more efficient or low pollutant emitting, equipment, e.g. Tier III or IV rated
- equipment;
- Use of alternative fueled construction equipment;
- Dust control measures for construction sites to minimize fugitive dust, e.g. watering,
- · soil stabilizers, and speed limits; and
- Minimizing idling time by construction vehicles.

NOISE

N-2 Construction Equipment Electrical power shall be used to run air compressors and similar power tools. Internal combustion engines should be equipped with a muffler of a type recommended by the manufacturer and in good repair. All diesel equipment should be operated with closed engine doors and should be equipped with factory-recommended mufflers. Construction equipment that continues to generate substantial noise at the project boundaries should be shielded with temporary noise barriers, such as barriers that meet a sound transmission class (STC) rating of 25, sound absorptive panels, or sound blankets on individual pieces of construction equipment. Stationary noise-generating equipment, such as generators and compressors, should be located as far as practically possible from the nearest residential property lines.

N-3 Limit Operations Adjacent to Receivers Limit the number of large pieces of equipment (i.e., bulldozers or concrete mixers) operating adjacent to receivers to one at any given time.

N-4 Neighbor Notification As part of applying for construction noise permits, notification to residential occupants adjacent to the project site at least 24 hours prior to initiation of construction activities that could result in substantial noise levels at outdoor or indoor living areas. This notification should include the anticipated ours and duration of construction and a description of noise reduction measures being implemented at the project site. The notification should include a

telephone number for local residents to call to submit complaints associated with construction noise. (SDMC Section 59.5.0404).

N-5 Noise Control Plan Construction contractors shall develop and implement a noise control plan that includes a noise control monitoring program to ensure sustained construction noise levels do not exceed 75 decibels over a 12-hour period at the nearest sensitive receivers. The plan may include the following requirements:

- Contractor shall turn off idling equipment.
- Contractor shall perform noisier operation during the times least sensitive to receptors.
- All diesel equipment shall be operated with closed engine doors and shall be equipped with factory- recommended mufflers.
- Electrical power shall be used to run air compressors and similar power tools and to power any temporary structures, such as construction trailers or security staff facilities.
- For all noise-generating construction activities, additional noise attenuation techniques shall be employed as necessary to reduce noise levels. Such techniques shall include, but are not limited to, the use of sound blankets, noise shrouds and temporary sound barriers between construction sites and nearby sensitive receptors as specified in the noise control plan.

BIOLOGICAL RESOURCES

BR-1 To reduce potentially significant impacts that would cause a reduction in the number of unique, rare, endangered, sensitive, or fully protected species of plants or animals, if present within the FPA area, all subsequent projects within CPIOZ Type B areas shall be analyzed in accordance with the CEQA Significance Thresholds, which require that site-specific biological resources surveys be conducted in accordance with City of San Diego Biology Guidelines.

Prj-BR-1: Final Biological Technical Report

Prior to the issuance of any development permit (e.g., Site Development Permit, Easement Vacation, Right of Way Vacation), or Notice to Proceed for any construction contract, a final site-specific biological technical report shall be prepared in accordance with the latest edition of the City's Biology Guidelines and approved by the ED/qualified City staff. The final report would confirm the project footprint, provide a ledger of areas previously mitigated by prior City projects (i.e. channel maintenance) and net mitigation acreage required pursuant to the Biology Guidelines, and identify the location of proposed mitigation.

BR-2 BIOLOGICAL RESOURCE PROTECTION DURING CONSTRUCTION

I. Prior to Construction

A. **Biologist Verification** -The Permittee shall provide a letter to the City's Environmental Designee (ED) stating that a Project Biologist (Qualified Biologist) as defined in the City of San Diego's Biological Guidelines (2018), has been retained to implement the project's biological monitoring program. The letter shall include the names, resumes, and contact information of all persons involved in the biological monitoring of the project.

- B. **Preconstruction Meeting -** The Qualified Biologist shall attend the preconstruction meeting, discuss the project's biological monitoring program, and arrange to perform any follow up mitigation measures and reporting including site-specific monitoring, restoration or revegetation, and additional fauna/flora surveys/salvage.
- C. **Biological Documents -** The Qualified Biologist shall submit all required documentation to ED verifying that any special mitigation reports including but not limited to, maps, plans, surveys, survey timelines, or buffers are completed or scheduled per City Biology Guidelines, Multiple Species Conservation Program (MSCP), Environmentally Sensitive Lands Ordinance (ESL), project permit conditions; California Environmental Quality Act (CEQA); endangered species acts (ESAs); and/or other local, state or federal requirements.
- D. **BCME** -The Qualified Biologist shall present a Biological Construction Mitigation/Monitoring Exhibit (BCME) which includes the biological documents in C above. In addition, include: restoration/revegetation plans, plant salvage/relocation requirements (e.g., coastal cactus wren plant salvage, burrowing owl exclusions, etc.), avian or other wildlife surveys/survey schedules (including general avian nesting and USFWS protocol), timing of surveys, wetland buffers, avian construction avoidance areas/noise buffers/ barriers, other impact avoidance areas, and any subsequent requirements determined by the Qualified Biologist and the City's ED. The BCME shall include a site plan, written and graphic depiction of the project's biological mitigation/monitoring program, and a schedule. The BCME shall be approved by the City's Environmental Designee (ED) and referenced in the construction documents.
- E. Avian Protection Requirements To avoid any direct impacts to Yellow Warbler and Least bell's viero, removal of habitat that supports active nests in the proposed area of disturbance should occur outside of the breeding season for these species (February 1 to September 15). If removal of habitat in the proposed area of disturbance must occur during the breeding season, the Qualified Biologist shall conduct a pre-construction survey to determine the presence or absence of nesting birds on the proposed area of disturbance. The pre-construction survey shall be conducted within three calendar days prior to the start of construction activities (including removal of vegetation). The applicant shall submit the results of the pre-construction survey to City ED for review and approval prior to initiating any construction activities. If nesting birds are detected, a letter report in conformance with the City's Biology Guidelines and applicable State and Federal Law (i.e. appropriate follow up surveys, monitoring schedules, construction and noise barriers/buffers, etc.) shall be prepared and include proposed measures to be implemented to ensure that take of birds or eggs or disturbance of breeding activities is avoided. The report shall be submitted to the City for review and approval and implemented to the satisfaction of the City. The City's ED and Environmental Biologist shall verify and approve that all measures identified in the report or are in place prior to and/or during construction.
- F. **Resource Delineation -** Prior to construction activities, the Qualified Biologist shall supervise the placement of orange construction fencing or equivalent along the limits of

disturbance adjacent to sensitive biological habitats and verify compliance with any other project conditions as shown on the BCME. This phase shall include flagging plant specimens and delimiting buffers to protect sensitive biological resources (e.g., habitats/flora & fauna species, including nesting birds) during construction. Appropriate steps/care should be taken to minimize attraction of nest predators to the site.

G. **Education** –Prior to commencement of construction activities, the Qualified Biologist shall meet with the owner/permittee or designee and the construction crew and conduct an onsite educational session regarding the need to avoid impacts outside of the approved construction area and to protect sensitive flora and fauna (e.g., explain the avian and wetland buffers, flag system for removal of invasive species or retention of sensitive plants, and clarify acceptable access routes/methods and staging areas, etc.).

II. During Construction

- A. **Monitoring** All construction (including access/staging areas) shall be restricted to areas previously identified, proposed for development/staging, or previously disturbed as shown on "Exhibit A" and/or the BCME. The Qualified Biologist shall monitor construction activities as needed to ensure that construction activities do not encroach into biologically sensitive areas, or cause other similar damage, and that the work plan has been amended to accommodate any sensitive species located during the pre-construction surveys. In addition, the Qualified Biologist shall document field activity via the Consultant Site Visit Record (CSVR). The CSVR shall be e-mailed to ED on the 1st day of monitoring, the 1st week of each month, the last day of monitoring, and immediately in the case of any undocumented condition or discovery.
- B. **Subsequent Resource Identification -** The Qualified Biologist shall note/act to prevent any new disturbances to habitat, flora, and/or fauna onsite (e.g., flag plant specimens for avoidance during access, etc). If active nests or other previously unknown sensitive resources are detected, all project activities that directly impact the resource shall be delayed until species specific local, state or federal regulations have been determined and applied by the Qualified Biologist.

III. Post Construction Measures

A. In the event that impacts exceed previously allowed amounts, additional impacts shall be mitigated in accordance with City Biology Guidelines, ESL and MSCP, State CEQA, and other applicable local, state and federal law. The Qualified Biologist shall submit a final BCME/report to the satisfaction of the City ED within 30 days of construction completion.

BR-3 Mitigation for Short-term Impacts to Sensitive Species from Project Construction

Specific measures necessary for reducing potential construction-related noise impacts to the coastal California gnatcatcher, least Bell's vireo, and the cactus wren are further detailed in LU-1 and BR-4.

Mitigation for impacts to sensitive wildlife species (including temporary and permanent noise impacts) resulting from future projects implemented in accordance with the FPA are included in Sections 5.1.6 (Land Use) and 5.6.3 (Biological Resources). Please refer to Mitigation Framework BR-1 through BR-5 and LU-1 (MHPA Land Use Adjacency Guidelines).

Prj-BR-3 Avoidance of Least Bell's Vireo Impacts

Prior to the preconstruction meeting, the City's Environmental Designee (ED) shall verify that Multi-Habitat Planning Area (MHPA) boundaries and the requirements regarding the least Bell's vireo, as specified below, are shown on the construction plans:

No clearing, grubbing, grading, or other construction activities shall occur during the least Bell's vireo breeding season (March 15 through September 15) until the following requirements have been met to the satisfaction of the ED:

- 1. A Qualified Biologist (possessing a valid Endangered Species Act Section 10[a][1][a] Recovery Permit) shall survey those habitat areas within the MHPA that would be subject to construction noise levels exceeding 60 decibels [dB(A)] hourly average for the presence of the least Bell's vireo and southwestern willow flycatcher. Surveys for least Bell's vireo, shall be conducted pursuant to the protocol survey guidelines established by the USFWS within the breeding season prior to the commencement of any construction. If least Bell's vireo are present, then the following conditions must be met:
 - a) March 15 through September 15 for least Bell's vireo, no clearing, grubbing, or grading of occupied habitat shall be permitted.
 - b) Areas restricted from such activities shall be staked or fenced under the supervision of a Qualified Biologist; and
 - c) March 15 through September 15 for least Bell's vireo no construction activities shall occur within any portion of the site where construction activities would result in noise levels exceeding 60 dB(A) hourly average at the edge of occupied habitat. An analysis showing that noise generated by construction activities shall not exceed 60 dB(A) hourly average at the edge of occupied habitat must be completed by a Qualified Acoustician (possessing current noise engineer license or registration with monitoring noise level experience with listed animal species) and approved by the ED at least 2 weeks prior to the commencement of construction activities. Prior to the commencement of construction activities during the breeding season, areas restricted from such activities shall be staked or fenced under the supervision of a Qualified Biologist; or,
 - d) At least 2 weeks prior to the commencement of construction activities, under the direction of a Qualified Acoustician, attenuation measures (e.g., berms, walls) shall be implemented to ensure that noise levels resulting from construction activities would not exceed 60 dB(A) hourly average at the edge of habitat occupied by the least Bell's vireo. Concurrent with the commencement of construction activities and the construction of

necessary noise attenuation facilities, noise monitoring shall be conducted at the edge of the occupied habitat area to ensure that levels do not exceed 60 dB(A) hourly average. If the noise attenuation techniques implemented are determined to be inadequate by the Qualified Acoustician or Biologist, construction activities shall cease until such time that adequate noise attenuation is achieved or until the end of the breeding season (September 16 and September 2 for the LBVI and SWFL, respectively). Construction noise monitoring shall continue to be monitored at least twice weekly on varying days, or more frequently depending on the construction activity, to verify that noise levels at the edge of occupied habitat are maintained below 60 dB(A) hourly average or to the ambient noise level if it already exceeds 60 dB(A) hourly average. If not, other measures shall be implemented in consultation with the Qualified Biologist and the ED, as necessary, to reduce noise levels to below 60 dB(A) hourly average or to the ambient noise level if it already exceeds 60 dB(A) hourly average or to the ambient noise level if it already exceeds 60 dB(A) hourly average or to the ambient noise level if it already exceeds 60 dB(A) hourly average or to the ambient noise level if it already exceeds 60 dB(A) hourly average or to the ambient noise level if it already exceeds 60 dB(A) hourly average or to the ambient noise level if it already exceeds 60 dB(A) hourly average or to the ambient noise level if it already exceeds 60 dB(A) hourly average or to the ambient noise level if it already exceeds 60 dB(A) hourly average or to the ambient noise level if it already exceeds 60 dB(A) hourly average or to the ambient noise level if it already exceeds 60 dB(A) hourly average or to the ambient noise level if it already exceeds 60 dB(A) hourly average or to the ambient noise level if it already exceeds 60 dB(A) hourly average or to the ambient noise level if it already exceeds 60 dB(A) hourly average or to the ambient noise level if it alrea

- 2. If least Bell's vireo are not detected during the protocol surveys, the Qualified Biologist shall submit substantial evidence to the ED and applicable resource agencies whether mitigation measures such as noise walls are necessary. From March 15 through September 15 for least Bell's vireo, adherence to the following is required:
 - a) If this evidence indicates that the potential is high for least Bell's vireo to be present based on historical records or site conditions, then Condition 1(a) shall be adhered to as specified above.
 - b) If this evidence concludes that no impacts to this species are anticipated, no mitigation measures would be necessary.

BR-4 To reduce potential direct impacts to City, state, and federally regulated wetlands, all subsequent projects developed in accordance with the FPA shall be required to comply with the USACE Clean Water Act Section 404 requirements and special conditions, CDFW Section 1602 Streambed Alteration Agreement requirements and special conditions, and the City of San Diego ESL Regulations for minimizing impacts to wetlands. Achieving consistency with these regulations for impacts on wetlands and special aquatic sites would reduce potential impacts to regulated wetlands and provide compensatory mitigation (as required) to ensure no net-loss of wetland habitats.

Prj-BR4 Habitat Mitigation

Prior to the issuance of any development permit (e.g., Site Development Permit, Easement Vacation, Right of Way Vacation), or Notice to Proceed for any construction contract, to compensate for the loss of sensitive vegetation (Tier I-III Uplands, Wetlands, and Covered Species Habitat), mitigation would be provided through identification of credits in the *Final Biological Technical Report* from an approved mitigation bank or equivalent mitigation site with associated habitat mitigation plan approved by the Environmental Designee. Mitigation shall not be required for any areas previously mitigated (e.g., channel maintenance).

Payment and credit allocation shall be provided to achieve the required mitigation ratios per the latest edition of the City's Biology Guidelines, prior to the start of construction. The City of San Diego Engineering and Capital Projects Department (ECP) shall be required to contribute the estimated

average per acre land cost, multiplied by the mitigation ratio plus any required amount for administration.

HYDROLOGY

HYD-1 All future project-specific developments shall be reviewed by City staff for potential runoff volumes and peak flow rate impacts (see City of San Diego Storm Water Management and Discharge Control Ordinance). If the City Staff determines that a future project specific development would potentially result in runoff impacts, the preparation of a project-specific Hydrology Study and Water Quality Technical Report shall be required. The project-specific reports shall identify specific mitigation measures such as on-site detention basins or bioretention facilities that would be incorporated into the design and construction of the project. Storm water improvements and water quality protection measures that shall be required for future projects include:

- Increasing onsite filtration;
- Preserving, restoring, or incorporating natural drainage systems into site design;
- Directing concentrated flows away from MHPA and open space areas. If not possible, drainage shall be directed into sediment basins, grassy swales, or mechanical trapping devices prior to draining into the MHPA or open space areas;
- Reducing the amount of impervious surfaces through selection of materials, site planning, and narrowing of street widths where possible;
- Increasing the use of vegetation in drainage design;
- Maintaining landscape design standards that minimize the use of pesticides and herbicides;
- To the extent practicable, avoiding development of areas particularly susceptible to erosion and sediment loss. To accommodate vector control, any measure used to control runoff or protect water quality shall ensure that it does not result in 0.5-inch or more of standing water for more than 96 hours.

Prj-HYD-1: Storm Water Quality Management Plan

Prior to the issuance of any development permit (e.g., Site Development Permit, Easement Vacation, Right of Way Vacation) or Notice to Proceed for any construction contract, a final Storm Water Quality Management Plan shall be prepared in accordance with the latest edition of the City of San Diego Storm Water Standards Manual and approved by qualified City staff.

HISTORICAL RESOURCES

HR-1 Prior to the issuance of any permit for a future development project the City shall determine whether any structure in excess of 45 years of age has potential historical significance. All buildings on a parcel shall be evaluated together. The evaluation of historic architectural resources shall be based on criteria such as: age, location, context, association with an important person or event, uniqueness, or structural integrity, as indicated in the Historic Resources Guidelines.

Preferred mitigation for historic buildings or structures shall be to avoid the historic resource through project redesign. If the resource cannot be entirely avoided, all prudent and feasible measures to minimize harm to the resource shall be taken. Depending upon project impacts, measures shall include, but are not limited to:

- a. Preparing a historic resource management plan;
- b. Designing new construction which is compatible in size, scale, materials, color and workmanship to the historic resource (such additions, whether portions of existing buildings or additions to historic districts, shall be clearly distinguishable from historic fabric);
- c. Repairing damage according to the Secretary of the Interior's Standards for Rehabilitation;
- d. Screening incompatible new construction from view through the use of berms, walls, and landscaping in keeping with the historic period and character of the resource;
- e. Shielding historic properties from noise generators through the use of sound walls, double glazing, and air conditioning; and
- f. Removing industrial pollution at the source of production.

Specific types of historical resource reports, outlined in Section III of the HRG, are required to document the methods to be used to determine the presence or absence of historical resources, to identify potential impacts from a proposed project, and to evaluate the significance of any historical resources identified. If potentially significant impacts to an identified historical resource are identified these reports will also recommend appropriate mitigation to reduce the impacts to below a level of significance. If required, mitigation programs can also be included in the report.

HR-2 Prior to issuance of any permit that could directly affect any archaeological resource or resources associated with prehistoric Native American activities, the City shall required the following steps be taken to determine: (1) the presence of archaeological resources and (2) the appropriate mitigation for any significant resources that may be impacted by a development activity.

Initial Determination:

The environmental analyst shall determine the likelihood for the project site to contain historical resources by reviewing site photographs and existing historic information (e.g., Archaeological Sensitivity Maps, the Archaeological Map Book, and the California Historical Resources Inventory System) and conducting a site visit. If there is any evidence that the site contains archaeological resources, then an evaluation consistent with the City of San Diego's Historical Resources Guidelines shall be required. All individuals conducting any phase of the archaeological evaluation program must meet professional qualifications in accordance with the City's Historical Resources Guidelines.

Step 1:

Based on the results of the Initial Determination, if there is evidence that the site contains archaeological resources, preparation of an evaluation report is required. The evaluation report could generally include background research, a field survey, archaeological testing and analysis. Before actual field reconnaissance would occur, background research is required that includes a record search at the SCIC at San Diego State University and the San Diego Museum of Man. A review of the Sacred Lands File maintained by the Native American Heritage Commission (NAHC) must also be conducted at this time. Information about existing archaeological collections shall also be obtained from the San Diego Archaeological Center and any tribal repositories or museums.

Once the background research is complete, a field reconnaissance must be conducted by individuals whose qualifications meet City standards. Consultants are encouraged to employ

innovative survey techniques when conducting enhanced reconnaissance, including, but not limited to, remote sensing, ground penetrating radar, and other soil resistivity techniques as determined on a case-by-case basis. Native American participation is required for field surveys when there is likelihood that the project site contains prehistoric archaeological resources or traditional cultural properties. If historical resources are identified through the background research and field surveys, then an evaluation of significance must be performed by a qualified archaeologist.

Step 2:

Once a resource has been identified, a significance determination must be made. It should be noted that tribal representatives and/or Native American monitors must be involved in making recommendations regarding the significance of prehistoric archaeological sites during this phase of the process. The testing program may require reevaluation of the proposed project in consultation with the Native American representatives, which could result in a combination of project redesign to avoid and/or preserve significant resources, as well as mitigation in the form of data recovery and monitoring (as recommended by the qualified archaeologist and Native American representative). An archaeological testing program will be required, which includes evaluating the horizontal and vertical dimensions of a site, the chronological placement, site function, artifact/ecofact density and variability, presence/absence of subsurface features, and research potential. A thorough discussion of testing methodologies, including surface and subsurface investigations, can be found in the City of San Diego's Historical Resources Guidelines.

The results from the testing program will be evaluated against the Significance Thresholds found in the Historical Resources Guidelines and in accordance with the provisions outlined in Section 15064.5 of the State CEQA Guidelines. If significant historical resources are identified within the project's Area of Potential Effect (APE), the site may be eligible for local designation. At this time, the final testing report must be submitted to Historical Resources Board staff for eligibility determination and possible designation. An agreement on the appropriate form of mitigation is required prior to distribution of a draft environmental document. If no significant resources are found, and site conditions are such that there is no potential for further discoveries, then no further action is required. Resources found to be non-significant as a result of a survey and/or assessment will require no further work beyond documentation of the resources on the appropriate DPR site forms and inclusion of results in the survey and/or assessment report. If no significant resources are found, but results of the initial evaluation and testing phase indicates there is still a potential for resources to be present in portions of the property that could not be tested, then mitigation monitoring is required.

Step 3:

Preferred mitigation for archaeological resources is to avoid the resource through project redesign. If the resource cannot be entirely avoided, all prudent and feasible measures to minimize harm shall be taken. For archaeological resources where preservation is not an option, a Research Design and Data Recovery Program (RDDRP) is required or is required to follow alternate treatment recommendations by the Most Likely Descendant (MLD), which includes a Collections Management Plan for review and approval. The data recovery program shall be based on a written research design and is subject to the provisions as outlined in CEQA Section 21083.2. If the archaeological site is an historical resource, then the limits on mitigation provided under CEQA

Section 21083.2 shall not apply, and treatment in accordance with CEQA Guidelines Section 15162.4 and 21084.1 is required. The data recovery program must be reviewed and approved by the City's Environmental Analyst prior to draft CEQA document distribution. Archaeological monitoring shall be required during building demolition and/or construction grading when significant resources are known or suspected to be present on a site, but cannot be recovered prior to grading due to obstructions such as, but not limited to, existing development or dense vegetation.

A Native American observer must be retained for all subsurface investigations, including geotechnical testing and other ground disturbing activities, whenever a Native American Traditional Cultural Property (TCP) or any archaeological site located on City property or within the APE of a City project would be impacted. In the event that human remains are encountered during data recovery and/or a monitoring program, the provisions of Public Resources Code Section 5097 must be followed. These provisions would be outlined in the MMRP included in the environmental document. The Native American monitor shall be consulted during the preparation of the written report, at which time they may express concerns about the treatment of sensitive resources. If the Native American community requests participation of an observer for subsurface investigations on private property, the request shall be honored.

Step 4:

Archaeological Resource Management reports shall be prepared in conformance with the California Office of Historic Preservation (OHP) "Archaeological Resource Management Reports (ARMR): Recommended Contents and Format" (see Appendix C of the Historical Resources Guidelines), which will be used by Environmental Analysis Section staff in the review of archaeological resource reports. Consultants must ensure that archaeological resource reports are prepared consistent with this checklist. This requirement will standardize the content and format of all archaeological technical reports submitted to the City. A confidential appendix must be submitted (under separate cover) along with historical resources reports for archaeological sites and TCPs containing the confidential resource maps and records search information gathered during the background study. In addition, a Collections Management Plan shall be prepared for projects that result in a substantial collection of artifacts and must address the management and research goals of the project and the types of materials to be collected and curated based on a sampling strategy that is acceptable to the City of San Diego. Appendix D (Historical Resources Report Form) shall be used when no archaeological resources were identified within the project boundaries.

Step 5:

For all Archaeological Resources: All cultural materials, including original maps, field notes, nonburial related artifacts, catalog information, and final reports recovered during public and/or private development projects must be permanently curated with an appropriate institution, one which has the proper facilities and staffing for insuring research access to the collections consistent with state and federal standards. In the event that a prehistoric and/or historic deposit is encountered during construction monitoring, a Collections Management Plan would be required in accordance with the project MMRP. The disposition of human remains and burial related artifacts that cannot be avoided or are inadvertently discovered is governed by state (i.e., AB 2641 and California Native American Graves Protection and Repatriation Act of 2001) and federal (i.e.,

Native American Graves Protection and Repatriation Act) law, and must be treated in a dignified and culturally appropriate manner with respect for the deceased individual(s) and their descendants. Any human bones and associated grave goods of Native American origin shall be turned over to the appropriate Native American group for repatriation.

Arrangements for long-term curation must be established between the applicant/property owner and the consultant prior to the initiation of the field reconnaissance, and must be included in the archaeological survey, testing, and/or data recovery report submitted to the City for review and approval. Curation must be accomplished in accordance with the California State Historic Resources Commission's Guidelines for the Curation of Archaeological Collections (dated May 7, 1993) and, if federal funding is involved, 36CFR79 of the Federal Register. Additional information regarding curation is provided in Section II of the Historical Resources Guidelines.

Prj-HR1 Cultural Monitoring

I. Prior to Permit Issuance or Bid Opening/Bid Award

A. Entitlements Plan Check

- Prior to permit issuance or Bid Opening/Bid Award, whichever is applicable, the E&CP Environmental Designee shall verify that the requirements for Archaeological Monitoring and Native American monitoring have been noted on the applicable construction documents through the plan check process.
- B. Letters of Qualification have been submitted to the E&CP Environmental Designee
 - 1. Prior to the Bid Award, the applicant shall submit a letter of verification to Mitigation Monitoring Coordination (MMC) identifying the project's Principal Investigator (PI) and the names of all persons involved in the archaeological monitoring program, as defined in the City of San Diego Historical Resources Guidelines (HRG). If applicable, individuals involved in the archaeological monitoring program must have completed the 40-hour HAZWOPER training with certification documentation.
 - 2. MMC will provide a letter to the applicant confirming the qualifications of the PI and that all persons involved in the archaeological monitoring of the project meet the qualifications established in the HRG.
 - 3. Prior to starting work, the applicant must obtain written approval from MMC for any personnel changes associated with the monitoring program.

II. Prior to the Start of Construction

A. Verification of Records Search

1. The PI shall provide verification to MMC that a site-specific records search (quarter-mile radius) has been completed. Verification includes, but is not limited to, a copy of a confirmation letter from the South Coastal Information Center, or, if the search was inhouse, a letter of verification from the PI stating that the search was completed.

- 2. The letter shall introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities.
- 3. The PI may submit a detailed letter to MMC requesting a reduction to the quarter-mile radius.

B. PI Shall Attend Precon Meetings

- Prior to beginning any work that requires monitoring; the Applicant shall arrange a
 Precon Meeting that shall include the PI, Native American consultant/monitor (where
 Native American resources may be impacted), Construction Manager (CM) and/or
 Grading Contractor, Resident Engineer (RE), and MMC. The qualified Archaeologist and
 Native American Monitor shall attend any grading/excavation-related Precon Meetings to
 make comments and/or suggestions concerning the Archaeological Monitoring program
 with the Construction Manager and/or Grading Contractor.
 - a. If the PI is unable to attend the Precon Meeting, the Applicant shall schedule a focused Precon Meeting with MMC, the PI, RE, CM or BI, if appropriate, prior to the start of any work that requires monitoring.
- 2. Acknowledgement of Responsibility for Curation (CIP or Other Public Projects)
 The applicant shall submit a letter to MMC acknowledging their responsibility for the cost of curation associated with all phases of the archaeological monitoring program.
- 3. Identify Areas to be Monitored
 - Prior to the start of any work that requires monitoring, the PI shall submit an Archaeological Monitoring Exhibit (AME) (with verification that the AME has been reviewed and approved by the Native American consultant/monitor when Native American resources may be impacted) based on the appropriate construction documents (reduced to 11x17) to MMC identifying the areas to be monitored including the delineation of grading/excavation limits.
 - The AME shall be based on the results of a site-specific records search as well as information regarding the age of existing pipelines, laterals, and associated appurtenances and/or any known soil conditions (native or formation).

MMC shall notify the PI that the AME has been approved.

- 4. When Monitoring Will Occur
 - a. Prior to starting any work, the PI shall also submit a construction schedule to MMC through the RE indicating when and where monitoring will occur.
 - b. The PI may submit a detailed letter to MMC prior to the start of work or during construction requesting a modification to the monitoring program. This request shall be based on relevant information, such as a review of final construction documents which indicate conditions such as the age of the existing pipe to be replaced, depth of excavation and/or site graded to bedrock, etc., which may reduce or increase the potential for resources to be present.
- 5. Approval of AME and Construction Schedule
 After MMC approves the AME, the PI shall submit to MMC written authorization of the
 AME and Construction Schedule from the CM.

III. During Construction

A. Monitor Shall be Present During Grading/Excavation/Trenching

- 1. The Archaeological Monitor shall be present full-time during all soil disturbing and grading/excavation/trenching activities which could result in impacts to archaeological resources as identified on the AME. The Construction Manager is responsible for notifying the RE, PI, and MMC of changes to any construction activities such as in the case of a potential safety concern within the area being monitored. In certain circumstances, OSHA safety requirements may necessitate modification of the AME.
- 2. The Native American consultant/monitor shall determine the extent of their presence during soil disturbing and grading/excavation/trenching activities based on the AME and provide that information to the PI and MMC. If prehistoric resources are encountered during the Native American consultant/monitor's absence, work shall stop, and the Discovery Notification Process detailed in Section III.B-C and IV.A-D shall commence.
- 3. The PI may submit a detailed letter to MMC during construction requesting a modification to the monitoring program when a field condition such as modern disturbance post-dating the previous grading/trenching activities, presence of fossil formations, or when native soils are encountered that may reduce or increase the potential for resources to be present.
- 4. The archaeological and Native American consultant/monitor shall document field activity via the Consultant Site Visit Record (CSVR). The CM shall fax the CSVRs to the RE on the first day of monitoring, the last day of monitoring, monthly (Notification of Monitoring Completion), and in the case of ANY discoveries. The RE shall forward copies to MMC.

B. Discovery Notification Process

- 1. In the event of a discovery, the Archaeological Monitor shall direct the contractor to temporarily divert all soil-disturbing activities, including but not limited to digging, trenching, excavating or grading activities in the area of discovery and in the area reasonably suspected to overlay adjacent resources and immediately notify the RE or BI, as appropriate.
- 2. The Monitor shall immediately notify the PI (unless the Monitor is the PI) of the discovery.
- 3. The PI shall immediately notify MMC by phone of the discovery and, if possible, submit written documentation by fax or email within 24 hours, with photos of the resource in context.
- 4. No soil shall be exported off-site until a determination can be made regarding the significance of the resource specifically if Native American resources are encountered.

C. Determination of Significance

- 1. The PI and Native American consultant/monitor, where Native American resources are discovered shall evaluate the significance of the resource. If Human Remains are involved, follow the protocol in Section IV below.
 - a. The PI shall immediately notify MMC by phone to discuss significance determination and shall also submit a letter to MMC indicating whether additional mitigation is required.
 - b. If the resource is significant, the PI shall submit an Archaeological Data Recovery Program (ADRP) and obtain written approval of the program from MMC, CM and RE.

ADRP and any mitigation must be approved by MMC, RE and/or CM before ground-disturbing activities in the area of discovery will be allowed to resume. Note: If a unique archaeological site is also a historical resource as defined in CEQA Section 15064.5, then the limits on the amount(s) that a project applicant may be required to pay to cover mitigation costs as indicated in CEQA Section 21083.2 shall not apply.

- (1). Note: For pipeline trenching and other linear projects in the public Right-of-Way, the PI shall implement the Discovery Process for Pipeline Trenching projects identified below under "D."
- c. If the resource is not significant, the PI shall submit a letter to MMC indicating that artifacts will be collected, curated, and documented in the Final Monitoring Report. The letter shall also indicate that no further work is required.
 - (1). Note: For Pipeline Trenching and other linear projects in the public Right-of-Way, if the deposit is limited in size, both in length and depth; the information value is limited and is not associated with any other resources; and there are no unique features/artifacts associated with the deposit, the discovery should be considered not significant.
 - (2). Note, for Pipeline Trenching and other linear projects in the public Right-of-Way, if significance cannot be determined, the Final Monitoring Report and Site Record (DPR Form 523A/B) shall identify the discovery as Potentially Significant.

IV. Discovery of Human Remains

If human remains are discovered, work shall halt in that area and no soil shall be exported offsite until a determination can be made regarding the provenance of the human remains; and the following procedures as set forth in CEQA Section 15064.5(e), the California Public Resources Code (Sec. 5097.98) and State Health and Safety Code (Sec. 7050.5) shall be undertaken:

A. Notification

- 1. Archaeological Monitor shall notify the RE , MMC, and the PI, if the Monitor is not qualified as a PI. MMC will notify the appropriate E&CP Environmental Designee to assist with the discovery notification process.
- 2. The PI shall notify the Medical Examiner after consultation with the RE, either in person or via telephone.

B. Isolate discovery site

- 1. Work shall be directed away from the location of the discovery and any nearby area reasonably suspected to overlay adjacent human remains until a determination can be made by the Medical Examiner in consultation with the PI concerning the provenience of the remains.
- 2. The Medical Examiner, in consultation with the PI, will determine the need for a field examination to determine the provenience.
- 3. If a field examination is not warranted, the Medical Examiner will determine with input from the PI, if the remains are or are most likely to be of Native American origin.

C. If Human Remains ARE determined to be Native American

- 1. The Medical Examiner will notify the Native American Heritage Commission (NAHC) within 24 hours. By law, ONLY the Medical Examiner can make this call.
- 2. NAHC will immediately identify the person or persons determined to be the Most Likely Descendent (MLD) and provide contact information.
- 3. The MLD will contact the PI within 24 hours or sooner after the Medical Examiner has completed coordination, to begin the consultation process in accordance with CEQA Section 15064.5(e), the California Public Resources and Health & Safety Codes.
- 4. The MLD will have 48 hours to make recommendations to the property owner or representative for the treatment or disposition with proper dignity of the human remains and associated grave goods.
- 5. Disposition of Native American Human Remains will be determined between the MLD and the PI, and, if:
 - a. The NAHC is unable to identify the MLD, OR the MLD failed to make a recommendation within 48 hours after being granted access to the site, OR;
 - b. The landowner or authorized representative rejects the recommendation of the MLD and mediation in accordance with PRC 5097.94 (k) by the NAHC fails to provide measures acceptable to the landowner, the landowner shall reinter the human remains and items associated with Native American human remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance, THEN
 - c. To protect these sites, the landowner shall do one or more of the following:
 - (1) Record the site with the NAHC;
 - (2) Record an open space or conservation easement; or
 - (3) Record a document with the County. The document shall be titled "Notice of Reinterment of Native American Remains" and shall include a legal description of the property, the name of the property owner, and the owner's acknowledged signature, in addition to any other information required by PRC 5097.98. The document shall be indexed as a notice under the name of the owner.
 - d. Upon the discovery of multiple Native American human remains during a ground-disturbing land development activity, the landowner may agree that additional conferral with descendants is necessary to consider culturally appropriate treatment of multiple Native American human remains. Culturally appropriate treatment of such a discovery may be ascertained from a review of the site utilizing cultural and archaeological standards. Where the parties are unable to agree on the appropriate treatment measures the human remains and items associated and buried with Native American human remains shall be reinterred with appropriate dignity, pursuant to Section 5.c., above.

D. If Human Remains are NOT Native American

- 1. The PI shall contact the Medical Examiner and notify them of the historic era context of the burial.
- 2. The Medical Examiner will determine the appropriate course of action with the PI and City staff (PRC 5097.98).
- 3. If the remains are of historic origin, they shall be appropriately removed and conveyed to the San Diego Museum of Man for analysis. The decision for the internment of the

human remains shall be made in consultation with MMC, E&CP Environmental Designee, the applicant/landowner, any known descendant group, and the San Diego Museum of Man.

V. Night and/or Weekend Work

- A. If night and/or weekend work is included in the contract
 - 1. When night and/or weekend work is included in the contract package, the extent and timing shall be presented and discussed at the precon meeting.
 - 2. The following procedures shall be followed.
 - a. No Discoveries
 In the event that no discoveries were encountered during night and/or weekend work, the PI shall record the information on the CSVR and submit to MMC via fax by 8 a.m. of the next business day.
 - Discoveries
 All discoveries shall be processed and documented using the existing procedures detailed in Sections III – During Construction, and IV – Discovery of Human Remains.
 Discovery of human remains shall always be treated as a significant discovery.
 - Potentially Significant Discoveries
 If the PI determines that a potentially significant discovery has been made, the procedures detailed under Section III During Construction and IV Discovery of Human Remains shall be followed.
 - d. The PI shall immediately contact the RE and MMC, or by 8 a.m. of the next business day to report and discuss the findings as indicated in Section III-B, unless other specific arrangements have been made.
- B. If night and/or weekend work becomes necessary during the course of construction
 - 1. The Construction Manager shall notify the RE at least 24 hours before the work is to begin.
 - 2. The RE shall notify MMC immediately.
- C. All other procedures described above shall apply, as appropriate.

Post Construction

- A. Submittal of Draft Monitoring Report
 - 1. The PI shall submit two copies of the Draft Monitoring Report (even if negative), prepared in accordance with the Historical Resources Guidelines (Appendix C/D) which describes the results, analysis, and conclusions of all phases of the Archaeological Monitoring Program (with appropriate graphics) to MMC via the RE for review and approval within 90 days following the completion of monitoring. It should be noted that if the PI is unable to submit the Draft Monitoring Report within the allotted 90-day timeframe as a result of delays with analysis, special study results or other complex

issues, a schedule shall be submitted to MMC establishing agreed due dates and the provision for submittal of monthly status reports until this measure can be met.

- For significant archaeological resources encountered during monitoring, the Draft Monitoring Report shall include the Archaeological Data Recovery Program or Pipeline Trenching Discovery Process.
- b. Recording Sites with State of California Department of Parks and Recreation The PI shall be responsible for recording (on the appropriate State of California Department of Park and Recreation forms-DPR 523 A/B) any significant or potentially significant resources encountered during the Archaeological Monitoring Program in accordance with the City's Historical Resources Guidelines, and submittal of such forms to the South Coastal Information Center with the Final Monitoring Report.
- 2. MMC shall return the Draft Monitoring Report to the PI via the RE for revision or, for preparation of the Final Report.
- 3. The PI shall submit a revised Draft Monitoring Report to MMC via the RE for approval.
- 4. MMC shall provide written verification to the PI of the approved report.
- 5. MMC shall notify the RE of receipt of all Draft Monitoring Report submittals and approvals.

B. Handling of Artifacts

- 1. The PI shall be responsible for ensuring that all cultural remains collected are cleaned and cataloged.
- 2. The PI shall be responsible for ensuring that all artifacts are analyzed to identify function and chronology as they relate to the history of the area, that faunal material is identified as to species, and that specialty studies are completed, as appropriate.

C. Curation of artifacts: Accession Agreement and Acceptance Verification

- 1. The PI shall be responsible for ensuring that all artifacts associated with the survey, testing and/or data recovery for this project are permanently curated with an appropriate institution. This shall be completed in consultation with MMC and the Native American representative, as applicable.
- 2. When applicable to the situation, the PI shall include written verification from the Native American consultant/monitor indicating that Native American resources were treated in accordance with state law and/or applicable agreements. If the resources were reinterred, verification shall be provided to show what protective measures were taken to ensure no further disturbance occurs in accordance with Section IV Discovery of Human Remains, Subsection C.
- 3. The PI shall submit the Accession Agreement and catalog record(s) to the RE or BI, as appropriate for donor signature, with a copy submitted to MMC.
- 4. The RE or BI, as appropriate, shall obtain a signature on the Accession Agreement and shall return it to PI with a copy submitted to MMC.
- 5. The PI shall include the Acceptance Verification from the curation institution in the Final Monitoring Report submitted to the RE and MMC.

D. Final Monitoring Report(s)

- 1. After notification from MMC of the approved report, the PI shall submit one copy of the approved Final Monitoring Report to the RE and one copy to MMC (even if negative) within 90 days.
- 2. The RE shall not issue the Notice of Completion until receiving a copy of the approved Final Monitoring Report from MMC, which includes the Acceptance Verification from the curation institution.

GEOLOGIC CONDITIONS

GC-1 Impacts associated with geologic hazards shall be mitigated at the project-level through adherence to the City's Seismic Safety Study and recommendations of a site-specific geotechnical report prepared in accordance with the City's Geotechnical Report Guidelines. Impacts shall also be avoided or reduced through engineering design that meets or exceeds adherence to the City's Municipal Code and the California Building Code.

Prj-GC-1a: Final Geotechnical Report

Prior to the issuance of any development permit (e.g., Site Development Permit, Easement Vacation, Right of Way Vacation), or Notice to Proceed for any construction contract, a final site-specific geotechnical report shall be prepared in accordance with the City's Geotechnical Report Guidelines and approved by qualified City staff. The final report should include analysis of project-specific subsurface explorations, minimization of post-construction settlement, a liquefaction assessment, lateral spreading analysis, and evaluation of slope stability.

HEALTH AND SAFETY

HS-1 Future projects are required to incorporate sustainable development and other measures in accordance with the Land Development Code-Landscape Standards which are intended to reduce the risk of wildfires. In addition, all future projects shall be reviewed for compliance with the 2010 California Fire Code, Section 145.0711 of the LDC, and Chapter 7 of the California Building Code.

HS-2 Property-specific due diligence processes shall be conducted by qualified environmental professionals, in accordance with applicable guidelines and regulations, on specific properties within the proposed FPA area prior to property transactions and/or future development. Phase I Environmental Site Assessments (ESAs) shall be conducted by qualified environmental professionals in accordance with the standard of care at that time (currently the American Society for Testing and Materials Standard Practice E1527-13) and applicable regulations (currently the EPA 40 Code of Federal Regulations §312 titled "Standards and Practices for All Appropriate Inquiries").

HS-3 For properties within the proposed FPA area with suspected or documented soil and/or groundwater contamination or other potential environmental concerns, further evaluation, such as Phase II ESAs and/or remediation activities, shall be conducted prior to or during future development activities by appropriately certified and/or registered professionals in accordance with a work plan that is approved by the regulatory agency having oversight of the activities. Results of previous assessment activities for a property (e.g., previous Phase II ESAs, UST removal sampling data) shall be evaluated by certified and/or registered professionals prior to future development activities.

HS-5 For properties with documented or suspected impacts to soil and/or groundwater, appropriate

worker and community health safety measures shall be implemented by the contractor under the oversight of a qualified environmental professional during soil/groundwater disturbance activities (e.g., dust control, air monitoring, stockpile management).

HS-6 It is possible that contaminated soil and/or groundwater, not identified during pre-construction technical studies, may be present within the proposed FPA area (e.g., lead in shallow soil, burn pits). For this reason, the following precautions shall be observed during excavation activities associated with the improvements conducted during future development:

- Pre-project activities (e.g., planning or early design) shall include site-specific environmental
- evaluation to address hazardous materials concerns related to worker and community health and safety, waste generation and disposal, and regulatory requirements.
- Caution shall be taken during excavation activities near the facilities associated with unauthorized releases, because of the potential for encountering documented and undocumented releases of contaminants and hazardous materials or wastes that may have occurred within or adjacent to these sites.
- Excavation and/or soil monitoring shall be conducted by professionals trained in the identification and management of hazardous materials or wastes, such as contaminated soil or groundwater.
- Appropriate references to the potential to encounter contaminated soil or groundwater shall be included in construction specifications.
- A Site Health and Safety Plan shall be prepared and implemented prior to initiation of construction activities within the boundaries of the proposed FPA area to reduce potential health and safety hazards to workers and the public.

HS-7 Soil generated during construction activities for future development (e.g., subsurface excavation, grading) at contaminated properties shall require chemical characterization (e.g., analytical testing) by a qualified environmental professional prior to reuse, export, or disposal.

HS-8 Further assessment is recommended to be performed by a qualified environmental professional if discolored soil or other potential environmental issues are encountered in the proposed FPA area during construction/future development activities. If contamination is discovered, regulatory agencies may require additional environmental investigation and/or mitigation to be conducted by the property owner, particularly if there is the potential to affect public health, safety, and/or the environment.

HS-9 Future development of impacted or potentially impacted properties involving soil excavation, grading, or other subsurface disturbance shall include implementation of a soil and groundwater management plan to address the possibility of encountering localized areas of potential environmental concern. The plan shall be prepared by a qualified environmental consultant and shall be implemented during soil/groundwater disturbance activities under the oversight of an environmental professional on behalf of the property owner/developer. The plan shall address monitoring of excavated soil, community and worker health and safety, and soil and groundwater handling, stockpiling, characterization, on-site reuse, export, and disposal protocols. Appropriate references to the potential to encounter contaminated soils and/or groundwater shall be included in construction specifications and bid documents so that the contractor can consider various factors (e.g., groundwater pumping rates, soil disposal) in their work.

HS-10 Groundwater at certain locations within the proposed FPA area has been documented as being impacted. Based on evidence of shallow groundwater depths (i.e., as shallow as 9 feet below adjacent ground surface) at some locations, if dewatering activities are planned for construction or other proposed improvements, they may be subject to increased disposal costs or other environmental surcharges (e.g., permitting) as a result of the presence of contaminated groundwater. A discharge permit will likely be required for dewatering, and water may need to be characterized by a qualified environmental consultant and/or treated prior to discharge. The RWQCB and/or agency providing oversight of wastewater discharge shall be contacted by a qualified environmental consultant in conjunction with the contractor and/or property owner for guidance on the requirements for discharge of dewatering effluent, prior to initiation of construction activities. The groundwater management plan mentioned in the previous bullet shall be implemented by a contractor during construction activities if groundwater is expected to be encountered.

HS-11 Prior to renovation or demolition of structures, surveys shall be conducted for the presence of hazardous building materials such as asbestos-containing materials, lead-containing surfaces, and other materials falling under UWR requirements. The surveys shall be conducted by California Department of Public Health Certified Lead Inspector/Assessors and California Division of Occupational Safety and Health Certified Asbestos Consultants in accordance with applicable local, state, and federal guidelines and regulations. Prior to renovation or demolition of buildings, appropriate abatement measures shall be implemented by a licensed abatement contractor using trained and certified workers and supervisors.

HS-12 For sites where structures are to be demolished, especially structures built in the 1970s or earlier, analyze surface and shallow soils for lead and termiticides prior to demolition or soil disturbance (e.g., grading).