



THE CITY OF SAN DIEGO

DRAFT

MITIGATED NEGATIVE DECLARATION

WBS No. S-15034 SCH No. N/A

SUBJECT: **JUNÍPERO SERRA MUSEUM ADA IMPROVEMENTS:** SITE DEVELOPMENT PERMIT AND MULTI-HABITAT PLANNING AREA (MHPA) BOUNDARY LINE ADJUSTMENT, CONTRACT AWARD, to allow construction of a new parking lot with five Americans with Disabilities Act (ADA) parking spaces and four standard parking spaces on the undeveloped knoll to the south of the Junípero Serra Museum at 2727 Presidio Dr., in Presidio Park. Other improvements include sidewalks along the northwestern edge of the proposed parking lot, an ADA-compliant path from the proposed parking lot to the museum, a driveway from the proposed parking lot to Presidio Drive, a 12-inch storm drain with two catch basins, two winged concrete headwalls, and a bioretention basin at the base of the proposed driveway. A Boundary Line Adjustment (BLA) to the MHPA would remove 0.31 acres and add 0.86 acres to the MHPA. The project site is subject to the regulations of the Old Town San Diego Planned District Ordinance. It is within the Overflight Area Boundary of the San Diego International Airport and the Airspace Protection Boundary of the Naval Air Station North Island. A portion of the site is currently located within the City of San Diego MHPA. The project site is zoned OTOP-1-1 (Old Town San Diego Open Space-Park), designated Park, Open Space, and Recreation in the City of San Diego General Plan, and designated as Park-City in the Old Town San Diego Community Plan (OTCP). The project is in the Old Town Community Planning Area in Council District 2.
LEGAL DESCRIPTION: PRESIDIO PARK***CITY#767481(79)(SERRAMUSEUM)IN**
APPLICANT/SPONSOR: City of San Diego Engineering and Capital Projects

I. PROJECT DESCRIPTION:

See attached Initial Study.

II. ENVIRONMENTAL SETTING:

See attached Initial Study.

III. DETERMINATION:

The City of San Diego conducted an Initial Study which determined that the project could have a significant environmental effect in the following areas(s): **BIOLOGICAL RESOURCES, CULTURAL**

RESOURCES (ARCHAEOLOGY), and TRIBAL CULTURAL RESOURCES. Subsequent revisions in the project proposal create the specific mitigation identified in Section V of this Mitigated Negative Declaration. The project, as revised, now avoids or mitigates the potentially significant environmental effects previously identified, and the preparation of an Environmental Impact Report would not be required.

IV. DOCUMENTATION:

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

V. MITIGATION, MONITORING AND REPORTING PROGRAM:

A. GENERAL REQUIREMENTS – PART I Plan Check

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

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

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

B. GENERAL REQUIREMENTS – PART II Post Plan Check (Prior to start of construction)

1. **PRE-CONSTRUCTION MEETING IS REQUIRED PRIOR TO BEGINNING ANY WORK ON THIS PROJECT.** The APPLICANT/SPONSOR is responsible for arranging and performing this meeting by contacting the CITY RESIDENT ENGINEER (RE) of the Construction Management and Field Engineering Division of the Engineering & Capital Projects Department (E&CP) and the ED. Attendees must also include the APPLICANT/SPONSOR'S Representative(s), Job Site Superintendent, and the following monitors: **Biological Monitor, Archaeological Monitor, and Tribal Cultural Monitor.**

Note: Failure of all responsible APPLICANT/SPONSOR'S representatives and consultants to attend shall require an additional meeting with all parties present.

CONTACT INFORMATION:

- a) The PRIMARY POINT OF CONTACT is the **RE** at the **Construction Management and Field Engineering Division at 858-627-3200.**

b) For Clarification of ENVIRONMENTAL REQUIREMENTS, it is also required to call **RE and ED at 858-627-3360.**

2. **MMRP COMPLIANCE:** This Project shall conform to the mitigation requirements contained in the associated Environmental Document and shall be implemented to the satisfaction of E&CP Environmental Permitting Support (EPS), the ED, and the City Engineer (i.e., RE). The requirements may not be reduced or changed, but may be annotated (e.g., to explain when and how compliance is being met and the location of verifying proof, etc.). Additional clarifying information may also be added to other relevant plan sheets and/or specifications as appropriate (e.g., specific locations, times of monitoring, methodology, etc.)

Note: APPLICANT/SPONSOR’S Representatives must alert the RE and ED to any discrepancies in the plans or notes, or any changes due to field conditions. All conflicts must be approved by the RE and ED BEFORE the work is performed.

3. **MONITORING EXHIBITS:** All consultants are required to submit to the RE and ED a monitoring exhibit on an 11x17 reduction of the appropriate construction plan, such as site plan, grading, landscape, etc., marked to clearly show the specific areas, including the LIMIT OF WORK, scope of that discipline’s work, and notes indicating when in the construction schedule that work would be performed. When necessary for clarification, a detailed methodology for performing the work shall be included.
4. **OTHER SUBMITTALS AND INSPECTIONS:** The APPLICANT/SPONSOR’s representative shall submit all required documentation, verification letters, and requests for all associated inspections to the RE and ED for approval per the following schedule:

Document Submittal/Inspection Checklist		
Issue Area	Document Submittal	Associated Inspection/Approvals/Notes
General	Consultant Qualification Letters	Prior to Preconstruction Meeting
General	Consultant Construction Monitoring Exhibits	Prior to or at the Preconstruction Meeting
Biology	Biologist Limit of Work Verification	Limit of Work Inspection
Biology	Biology Reports	Biology/Habitat Restoration Inspection
Cultural/Tribal Cultural Resources	Cultural/Archaeology Reports	Archaeology/Historic Site Observation

C. SPECIFIC MMRP ISSUE AREA CONDITIONS/REQUIREMENTS

MM-BIO-1: RESOURCE PROTECTIONS DURING CONSTRUCTION

I. Prior to Construction

- A. **Biologist Verification:** The owner/permittee shall provide a letter to the 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 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 the 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 ADD/MMC. The BCME shall include a site plan, a written and graphic depiction of the project's biological mitigation/monitoring program, and a schedule. The BCME shall be approved by the ED and referenced in the construction documents.
- E. **Avian Protection Requirements:** To avoid any direct impacts to western bluebird and Cooper's Hawk and any avian species that are listed, candidate, sensitive, or special status in the MSCP, 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 (3) 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 Qualified Biologist shall verify and approve that all measures identified in the report 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 on-site 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 (CSV). The CSV shall be emailed to the 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.

MM-BIO-2 Monarch Butterfly Overwintering.

Prior to either issuance of the building permit or contract award, the City of San Diego Environmental Designee (ED) shall verify the following project requirements regarding the monarch butterfly are shown on the construction plans and/or contract specifications:

- A. **Direct Impact Avoidance for Monarch Butterfly.** To avoid any direct impacts to overwintering monarch butterfly, clearing, grubbing, or removal of potentially suitable roosting trees in the proposed area of disturbance should occur outside of the overwintering season for this species (October 1 to March 31). If removal of habitat in the proposed area of disturbance must occur during the overwintering season, a Qualified Biologist shall conduct a preconstruction (precon) survey to determine the presence or absence of overwintering monarchs in the proposed area of disturbance. The precon survey shall be conducted within 10 working days prior to the start of tree removal. The applicant shall submit the results of the precon survey to City ED for review and approval prior to initiating any tree removal. If overwintering monarchs are detected, a letter report or mitigation plan in conformance with the City's Biology Guidelines and applicable state and federal law shall be prepared and include proposed measures to avoid removal of trees within occupied areas (appropriate follow-up surveys, monitoring schedules, etc.) until the overwintering monarchs have dispersed. The report or mitigation plan shall be submitted to the City ED for review and approval, and implemented to the satisfaction of the City. The City's ED or Resident Engineer (RE), and the Qualified Biologist shall verify and approve that all measures identified in the report or mitigation plan are in place prior to and/or during construction. If monarchs are not detected during the precon survey, no further mitigation is required.
- B. **Post-construction monitoring** for monarch butterfly would be conducted in coordination with the Xerces Society and City Park and Recreation Open Space staff.

MM-BIO-3 Direct Impact Avoidance for Crotch's Bumble Bee.

Prior to the Issuance of either the building permit issuance or contract award, the Designee (ED) shall verify the following project requirements regarding the Crotch's bumble bee are shown on the construction plans:

- A. To avoid impacts to Crotch's bumble bee, removal of habitat in the proposed area of disturbance must occur outside of the Colony Active Period between April 1 through August 31. If removal of habitat in the proposed area of disturbance must occur during the Colony Active Period, a Qualified Biologist shall conduct a pre-construction survey to determine the presence or absence of Crotch's bumble bee within the proposed area of disturbance.
- B. Surveys must be conducted by a Qualified Biologist meeting the qualifications discussed in the California Department of Fish and Wildlife (CDFW) guidance (i.e., Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species, dated June 6, 2023). The Qualified Biologist shall send all photo vouchers to a CDFW-approved taxonomist to confirm the identifications of the bumble bees encountered during surveys.

- C. A Qualified Biologist must demonstrate the following qualifications: at least 40 hours of experience surveying for bee or other co-occurring aerial invertebrate species (such as Quino checkerspot butterfly) and who have completed a Crotch's bumble bee detection/identification training by an expert Crotch's bumble bee entomologist; or the biologist must have at least 20 hours of experience directly observing Crotch's bumble bee.
- D. The pre-construction survey shall be conducted during the colony active period between April 1 through August 31 by the Qualified Biologist prior to the issuance of Demolition Plans/Permits and Building Plans/Permits and within one year prior to the initiation of project activities (including removal of vegetation). The pre-construction survey shall consist of photographic surveys following CDFW guidance (i.e., Survey CESA Candidate Bumble Bee Species, dated June 6, 2023). The surveys shall consist of passive methods unless a Memorandum of Understanding is obtained, as described below. The surveys shall consist of three separate visits spaced two to four weeks apart. Survey results would be considered valid until the start of the next colony active period.
- E. If additional activities (e.g., capture or handling) are deemed necessary to identify bumble bees of an unknown species that may be Crotch's bumble bee, then the Qualified Biologist shall obtain the required authorization via a Memorandum of Understanding or Scientific Collecting Permit pursuant to CDFW Survey Considerations for CESA Candidate Bumble Bee Species (CDFW 2023). Survey methods that involve lethal take of species are not acceptable.
- F. The Qualified Biologist/owner permittee shall submit the results (including positive or negative survey results) of the pre-construction survey to the ED, City Planning Department (MSCP) staff, and CDFW for review and written approval prior to the issuance of Demolition Plans/Permits and Building Plans/Permits.
- G. If pre-construction surveys identify Crotch's bumble bee individuals on-site, the Qualified Biologist shall notify CDFW and the Qualified Biologist shall notify and consult with CDFW to determine whether project activities would result in impacts to Crotch's bumble bee, in which case an Incidental Take Permit (ITP) may be required. If an ITP is required, it shall be obtained prior to issuance of Demolition Plans/Permits and Building Plans/Permits and all necessary permit conditions shall be fulfilled prior to initiation of project activities. Take of any endangered, threatened, or candidate species that results from the Project is prohibited, except as authorized by state law (California Fish and Game Code §§ 86, 2062, 2067, 2068, 2080, 2085; California Code of Regulations, Title 14, § 786.9) under the CESA.
- H. Survey data shall be submitted by the Qualified Biologist to the California Natural Diversity Database (CNDDDB) in accordance with the Memorandum of Understanding with CDFW, or Scientific Collecting Permit requirements, as applicable.

MM-CUL-1: CONSTRUCTION MONITORING

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

- A. Entitlements Plan Check
 - 1. Prior to permit issuance or Bid Opening/Bid Award, whichever is applicable, the ED 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 ED
 - 1. Prior to Bid Award, the applicant shall submit a letter of verification to the ED identifying the Principal Investigator (PI) for the project and the names of all persons involved in the archaeological monitoring program, as defined in the City of San Diego Historical Resources Guidelines (HRG). If applicable, individuals involved in the archaeological monitoring program must have completed the 40-hour HAZWOPER training with certification documentation.
 - 2. ED would provide a letter to the applicant confirming that the qualifications of the PI and all persons involved in the archaeological monitoring of the project meet the qualifications established in the HRG.
 - 3. Prior to the start of work, the applicant must obtain written approval from ED for any personnel changes associated with the monitoring program.

II. Prior to Start of Construction

- A. Verification of Records Search
 - 1. The PI shall provide verification to the ED 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 South Coastal Information Center, or, if the search was in-house, a letter of verification from the PI stating that the search was completed.
 - 2. The letter shall introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities.
 - 3. The PI may submit a detailed letter to ED requesting a reduction to the ¼ mile radius.
- B. PI Shall Attend Precon Meetings
 - 1. Prior to beginning any work that requires monitoring, the Applicant shall arrange a Preconstruction Meeting that shall include the PI, Native American consultant/monitor (where Native American resources may be impacted), Construction Manager (CM) and/or Grading Contractor, RE, and ED. 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 Preconstruction Meeting with the ED, PI, RE, and CM prior to the start of any work that requires monitoring.
 - 2. Acknowledgment of Responsibility for Curation (CIP or Other Public Projects)
The applicant shall submit a letter to ED 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 11"x17") to the ED 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).

The ED shall notify the PI that the AME has been approved.

4. When Monitoring Would Occur
 - a. Prior to the start of any work, the PI shall also submit a construction schedule to the ED through the RE, indicating when and where monitoring would occur.
 - b. The PI may submit a detailed letter to the ED 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 existing pipe to be replaced, the 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 the AME is obtained from the ED, the PI shall submit to the ED 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 that could result in impacts to archaeological resources as identified on the AME. The CM is responsible for notifying the RE, PI, and ED 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 ED. 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 the ED 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 (CSVSR). The CSVSR's shall be faxed by the CM 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 the ED.
 5. Per the project Cultural Research Report, it would be the responsibility of the monitor to complete a daily log addressing construction activities, personnel on site and results of the monitoring. A report summarizing the results of the monitoring

effort and further recommendations shall be prepared and submitted to the SCIC once all work has been completed.

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 ED. Once a potential resource has been identified, all work within 100 ft must be halted until the find can be assessed by a qualified archaeologist.
2. The Monitor shall immediately notify the PI (unless the Monitor is the PI) of the discovery.
3. The PI shall immediately notify the ED by phone of the discovery, and shall also submit written documentation to the ED within 24 hours by fax or email with photos of the resource in context, if possible.
4. No soil shall be exported off-site until a determination can be made regarding the significance of the resource, specifically if Native American resources are encountered.

B. Determination of Significance

1. The PI and Native American consultant/monitor, where Native American resources are discovered, shall evaluate the significance of the resource. If Human Remains are involved, follow protocol in Section IV below.
 - a. The PI shall immediately notify the ED by phone to discuss significance determination and shall also submit a letter to the ED 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 the ED, CM and RE. ADRP and any mitigation must be approved by ED, RE, and/or CM before ground disturbing activities in the area of discovery would be allowed to resume. Note: If a unique archaeological site is also an 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.
 - c. If the resource is not significant, the PI shall submit a letter to the ED indicating that artifacts would be collected, curated, and documented in the Final Monitoring Report. The letter shall also indicate that no further work is required.

IV. Discovery of Human Remains

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

A. Notification

1. Archaeological Monitor shall notify the RE, ED, and the PI if the Monitor is not qualified as a PI. ED would notify the appropriate archaeological qualified staff member within the City of San Diego 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, would determine the need for a field examination to determine the provenience.
 3. If a field examination is not warranted, the Medical Examiner would 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 would notify the Native American Heritage Commission (NAHC) within 24 hours. By law, ONLY the Medical Examiner can make this call.
 2. NAHC would immediately identify the person or persons determined to be the Most Likely Descendent (MLD) and provide contact information.
 3. The MLD would 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 would 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 would 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 owner's name.

- C. 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 would 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 internment of the human remains shall be made in consultation with the ED, a qualified City staff member, ECP management, 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 preconstruction meeting.
 - 2. The following procedures shall be followed.
 - a. No Discoveries
In the event that no discoveries are encountered during night and/or weekend work, the PI shall record the information on the CSV and submit it to ED via fax by 8 a.m. of the next business day.
 - b. Discoveries
All discoveries shall be processed and documented using the existing procedures detailed in Sections III - During Construction, and IV - Discovery of Human Remains. The discovery of human remains shall always be treated as a significant discovery.
 - c. Potentially Significant Discoveries
If the PI determines that a potentially significant discovery has been made, the procedures detailed under Section III-During Construction and IV-Discovery of Human Remains shall be followed.
 - d. The PI shall immediately contact the RE and ED, 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 CM shall notify the RE a minimum of 24 hours before the work is to begin.
 - 2. The RE shall notify the ED immediately.
- C. All other procedures described above shall apply, as appropriate.

VI. 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 the ED 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 the ED establishing agreed-upon due dates and the provision for submittal of monthly status reports until this measure can be met.

- a. For significant archaeological resources encountered during monitoring, the Archaeological Data Recovery Program or Pipeline Trenching Discovery Process shall be included in the Draft Monitoring Report.
 - b. Recording Sites with State of California Department of Parks and Recreation
The PI shall be responsible for recording (on the appropriate State of California Department of Parks 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 HRG, and submittal of such forms to the South Coastal Information Center with the Final Monitoring Report.
2. The ED 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 the revised Draft Monitoring Report to the ED via the RE for approval.
 4. The ED shall provide written verification to the PI of the approved report.
 5. The ED 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 the ED and the Native American representative, as applicable.
 2. The PI shall include the Acceptance Verification from the curation institution in the Final Monitoring Report submitted to the RE and ED.
 3. When applicable to the situation, the PI shall include written verification from the Native American consultant/monitor indicating that Native American resources were treated in accordance with state law and/or applicable agreements. If the resources were reinterred, verification shall be provided to demonstrate protective measures were taken to ensure no further disturbance occurs in accordance with Section IV- Discovery of Human Remains, Subsection C.
- D. Final Monitoring Report(s)

1. The PI shall submit one copy of the approved Final Monitoring Report to the RE and one copy to the ED (even if negative), within 90 days after notification from the ED of the approved report.
2. The RE shall, in no case, issue the Notice of Completion until receiving a copy of the approved Final Monitoring Report from the ED, which includes the Acceptance Verification from the curation institution.

MM-PALEO-1 Paleontological Resources Monitoring:

I. Prior to Permit Issuance

A. Entitlements Plan Check

1. Prior to issuance of any construction permits, including but not limited to Demolition Plans/Permits and Building Plans/Permits or a Notice to Proceed for Subdivisions, but prior to the first preconstruction meeting, whichever is applicable, the City Engineer and/or Building Inspector (BI) shall verify that the requirements for Paleontological Monitoring have been noted on the appropriate construction documents.
2. The applicant shall submit a letter of verification to the Resident Engineer (RE) and/or Building Inspector (BI) identifying the qualified Principal Investigator (PI) for the project and the names of all persons involved in the paleontological monitoring program. A qualified PI is defined as a person with a Ph.D., M.S., or equivalent in paleontology or a closely related field (e.g., sedimentary or stratigraphic geology, evolutionary biology, etc.) with demonstrated knowledge of southern California paleontology and geology and documented experience in professional paleontological procedures and techniques.

II. Prior to Start of Construction

A. Verification of Records Search

1. The PI shall provide verification to the RE and/or BI that a site-specific records search has been completed. Verification includes, but is not limited to, a copy of a confirmation letter from the San Diego Natural History Museum or another relevant institution that maintains paleontological collections recovered from sites within the City of San Diego.
2. The letter shall introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities.

B. PI Shall Attend Preconstruction Meetings

1. Prior to beginning any work that requires monitoring, the Applicant shall arrange a Preconstruction Meeting that shall include the PI, Construction Manager (CM) and/or Grading Contractor, RE, and BI, as appropriate. The PI shall attend any grading/excavation-related Preconstruction Meetings to make comments and/or suggestions concerning the Paleontological Monitoring program with the CM and/or Grading Contractor.
 - a. If the PI is unable to attend the Preconstruction Meeting, the Applicant shall schedule a focused Preconstruction Meeting with the PI, RE, CM or BI, if appropriate, prior to the start of any work that requires monitoring.

2. Identify Areas to be Monitored
Prior to the start of any work that requires monitoring, the PI shall submit a Paleontological Monitoring Exhibit (PME) based on the appropriate construction documents (reduced to 11x17) to the RE and/or BI, identifying the areas to be monitored, including the delineation of grading/excavation limits. The PME shall be based on the results of a site-specific records search as well as information regarding existing known geologic conditions (e.g., geologic deposits as listed in the Paleontological Monitoring Determination Matrix below).
3. When Monitoring Would Occur
 - a. Prior to the start of any work, the PI shall also submit a construction schedule to the RE and/or BI indicating when and where monitoring would occur.
 - b. The PI may submit a detailed letter to RE and/or BI 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 and geotechnical reports, which indicate conditions such as depth of excavation and/or thickness of artificial fill overlying bedrock, the presence or absence of fossils, etc., which may reduce or increase the potential for resources to be present.

III. During Construction

- A. Monitor Shall be Present During Grading/Excavation/Trenching
 1. The paleontological monitor shall be present full-time during grading/excavation/trenching activities as identified on the PME that could result in impacts to formations with high and moderate resource sensitivity. The CM is responsible for notifying the PI, RE, and/or BI of changes to any construction activities, such as in the case of a potential safety concern within the area being monitored. In certain circumstances, Occupational Safety and Health Administration safety requirements may necessitate modification of the PME.
 2. The PI may submit a detailed letter to the RE and/or BI during construction requesting a modification to the monitoring program when a field condition, such as trenching activities that do not encounter previously undisturbed and paleontologically sensitive geologic deposits as previously assumed, and/or when unique/unusual fossils are encountered, which may reduce or increase the potential for paleontological resources to be present.
 3. The paleontological monitor shall document field activity via the Consultant Site Visit Record (CSVR). The CSVRS shall be emailed by the CM to the RE and/or BI on the first day of monitoring, the last day of monitoring, monthly (Notification of Monitoring Completion), and in the case of ANY discoveries.
- B. Discovery Notification Process
 1. In the event of a discovery, the paleontological monitor shall direct the contractor to temporarily divert trenching activities in the area of discovery and notify the RE and/or BI. The contractor shall also process a construction change for administrative purposes to formalize the documentation and

recovery program, including modification, to the Environmental Designee (ED).

2. The paleontological monitor shall notify the PI (unless the paleontological monitor is the PI) of the discovery.
3. The PI shall notify the ED of the discovery and shall submit documentation to the ED within 24 hours by email with photos of the resource in context.

C. Recovery of Fossils

If a paleontological resource is encountered:

1. The paleontological monitor shall salvage unearthed fossil remains, including simple excavation of exposed specimens or, if necessary, as determined by the PI, plaster jacketing of large and/or fragile specimens or more elaborate quarry excavations of richly fossiliferous deposits.
2. The paleontological monitor shall record stratigraphic and geologic data to provide a context for the recovered fossil remains, including a detailed description of all paleontological localities within the project site, as well as the lithology of fossil-bearing strata within the measured stratigraphic section, and photographic documentation of the geologic setting.

IV. Post Construction

A. Preparation and Submittal of Draft Paleontological Monitoring Report

1. The PI shall submit two copies of the Draft Paleontological Monitoring Report (even if negative), prepared to the satisfaction of the ED. The Draft Paleontological Monitoring Report shall describe the methods, results, and conclusions of all phases of the Paleontological Monitoring Program (with appropriate graphics) to the ED for review and approval within 90 days following the completion of monitoring.
 - a. For significant or potentially significant paleontological resources encountered during monitoring, as identified by the PI, the Paleontological Recovery Program shall be included in the Draft Monitoring Report.
 - b. The PI shall be responsible for recording (on the appropriate forms) any significant or potentially significant fossil resources encountered during the Paleontological Monitoring Program in accordance with the City of San Diego's Paleontological Guidelines (revised November 2017), and submittal of such forms to the San Diego Natural History Museum and the ED with the Draft Paleontological Monitoring Report.
2. The ED shall return the Draft Paleontological Monitoring Report to the PI for revision or preparation of the Final Report.
3. The PI shall submit a revised Draft Paleontological Monitoring Report to the ED for approval.
4. The ED shall provide written verification to the PI of the approved Draft Paleontological Monitoring Report.
5. The ED shall notify the RE and/or BI of receipt of all Draft Paleontological Monitoring Report submittals and approvals.

B. Handling of Recovered Fossils

1. The PI shall ensure that all fossils collected are cleaned to the point of curation (e.g., removal of extraneous sediment, repair of broken specimens,

and consolidation of fragile/brittle specimens) and cataloged as part of the Paleontological Monitoring Program.

2. The PI shall ensure that all fossils are analyzed to identify stratigraphic provenance, geochronology, and taphonomic context of the source geologic deposit; that faunal material is taxonomically identified; and that curation has been completed, as appropriate.

C. Curation of Fossil Remains: Deed of Gift and Acceptance Verification

1. The PI shall be responsible for ensuring that all fossils associated with the paleontological monitoring program for this project are permanently curated with an accredited institution that maintains paleontological collections (such as the San Diego Natural History Museum).
2. The PI shall include an acceptance verification from the curation institution in the Final Paleontological Monitoring Report submitted to the RE and/or BI, and the ED.

D. Final Paleontological Monitoring Report(s)

1. The PI shall submit two copies of the Final Paleontological Monitoring Report to the ED (even if negative) within 90 days after notification from the ED that the Final Paleontological Monitoring Report has been approved.
2. The RE and/or BI shall in no case issue the Notice of Completion until receiving a copy of the approved Final Paleontological Monitoring Report from the ED, which includes the Acceptance Verification from the curation institution.

VI. PUBLIC REVIEW DISTRIBUTION:

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

Federal Government

U.S. Fish and Wildlife Service (23)

State of California

California Department of Fish and Wildlife (32)

California State Parks (371)

City of San Diego

Mayor's Office (91)

Councilmember Jennifer Campbell – District 2

City Attorney's Office (93C)

Engineering & Capital Projects Department

Nancy Graham

Kristen Forberger

Nicholas Ferracone

Nirvana Walder

Jamie Kennedy

Marissa Mariscal

Elizabeth Schroth-Nichols

Nicole Fortier

Planning Department

Daniel Monroe, MSCP

Presidio Park Council

Ryan Robertson – Senior Park Ranger (370)

Other Interested Parties

Old Town San Diego (368)

Old Town SD Chamber of Commerce (369)

Historical Resources Board (87)

Sierra Club San Diego Chapter (165)

San Diego Natural History Museum (166)

San Diego Bird Alliance (167)

Jim Peugh (167A)

California Native Plant Society (170)

Endangered Habitats League (182A)

Carmen Lucas (206)

South Coastal Information Center (210)

San Diego Historical Society (211)

San Diego Archaeological Center (212)

Save Our Heritage Organisation (214)

Ron Christman (215)

Clint Linton (215B)

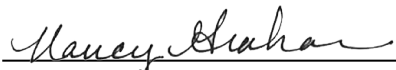
Inter-Tribal Cultural Resources Council (216)

Campo Band of Mission Indians (217)
San Diego County Archaeological Society Inc EIR Review Committee (218)
Native American Heritage Commission (222)
Kumeyaay Cultural Heritage Preservation (223)
Kumeyaay Cultural Repatriation Committee (225)
Native American Distribution (225A-T)
Richard Drury
Molly Greene
Chase Preciado
John Stump

VII. RESULTS OF PUBLIC REVIEW:

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

Copies of the Mitigated Negative Declaration and associated project-specific technical appendices, if any, may be accessed on the City's CEQA webpage at <https://www.sandiego.gov/ceqa/final>.



Nancy Graham, AICP
Program Manager
Engineering and Capital Projects

June 1, 2026
Date of Draft Report

Date of Final Report

Analyst: M. Mariscal

Attachments: Initial Study Checklist
Figure 1: Regional Location
Figure 2: Proposed Project Components
Figure 3: Proposed MHPA Boundary Line Adjustment

INITIAL STUDY CHECKLIST

1. Project title/Project number: Junípero Serra Museum ADA Improvement Project / WBS No. S-15034
2. Lead agency name and address: City of San Diego, 8525 Gibbs Drive, Suite 302, San Diego, California 92123
3. Contact person and phone number: Marissa Mariscal / (619) 557-7944
4. Project location: The Junípero Serra Museum is in the northern portion of Presidio Park at 2727 Presidio Dr., in the city of San Diego, California (APNs 76010275 and 44252007). The project site covers a portion of the knoll directly south of the museum, approximately 0.4 miles northeast of the Old Town area of San Diego and approximately 2.75 miles northwest of downtown San Diego. The project is approximately 250 feet south of Interstate 8 (I-8) and 0.60 miles east of Interstate 5 (I-5). The project site is bounded on the west by Presidio Drive, on the south by Cosoy Way, on the east by Palm Canyon, and on the north by the Junípero Serra Museum (Figure 1).
5. Project Applicant/Sponsor's name and address: Nicole Fortier, City of San Diego Engineering and Capital Projects, 8525 Gibbs Dr., Suite 302, San Diego, California 92123
6. General/Community Plan designation: General Plan: Park, Open Space, and Recreation; Community Plan: Park-City
7. Zoning: OTOP-1-1 (Old Town San Diego Open Space-Park)
8. Description of project (Describe the whole action involved, including but not limited to, later phases of the project, and any secondary, support, or off-site features necessary for its implementation.):

Project Construction

The proposed Junípero Serra Museum ADA Improvement Project (project) requires a Site Development Permit and MHPA Boundary Line Adjustment to allow construction of a new ADA-compliant parking lot that would expand available parking capacity and provide ADA-compliant access to the Junípero Serra Museum. Figure 2 shows the project components, which would be built on the knoll to the south of the Junípero Serra Museum, north of Cosoy Way. The proposed parking lot would include four standard diagonal parking spaces and five ADA-compliant diagonal parking spaces (nine total spaces) and would be accessed by a new 28-foot-wide driveway connecting the proposed parking lot with Presidio Drive. The proposed parking lot would expand parking capacity at the museum by 20 percent. The existing 44-space parking lot, which has 41 standard parking spaces and 3 ADA-compliant parking spaces, is directly west of the museum, across Presidio Drive and north of the project site.

A proposed six-foot-wide ADA-compliant concrete path would provide access between the proposed parking lot and the existing museum's main terrace. A proposed concrete sidewalk

along the northwest edge of the proposed parking lot would provide a pedestrian connection to the ADA-compliant path. Approximately 108 linear feet of 3-foot tall retaining wall would run along portions of the ADA-compliant path. A 19-foot by 52-foot biofiltration basin is proposed at the base of the driveway near Presidio Drive. Two proposed catch basins would also be installed.

The project would include lighting and signage around the parking lot, the sidewalk, and the ADA-compliant path. The proposed lighting includes thirteen 13-to-15-foot-tall, pole-mounted streetlights with downcast shades that would be placed along the access driveway, the parking lot, and the ADA-compliant path. Trenching for and placement of underground electrical lines would extend from the northern project boundary, under Presidio Drive, to the existing electrical supply at the existing parking lot to the west of the project site.

The Junípero Serra Museum and the Presidio site property are listed on the City of San Diego's Register of Historical Resources (Historical Resources Board [HRB] #4 – Presidio of San Diego Site; HRB #35–Presidio Excavation Site, HRB #237–Junípero Serra Museum, and HRB #240–Presidio Park). The Presidio Park site is also listed in the National Register of Historic Places (#66000226, October 15, 1966) and is a California Historical Landmark (#59, March 7, 1968). The project would be completed in accordance with the Secretary of the Interior's Standards for Rehabilitation. The project would meet requirements pursuant to the latest edition of the City of San Diego's Land Development Code, Landscape Standards, and Standard Specifications for Public Works Construction ("Whitebook").

Landscaping and MHPA BLA

Landscaping would be provided throughout the project site. Project implementation would require the removal of approximately 53 trees, primarily eucalyptus, including: 27 red gum (*Eucalyptus camaldulensis*), 8 swamp mahogany (*Eucalyptus robusta*), 5 red ironbark (*Eucalyptus sideroxylon*), 4 Canary Island pine (*Pinus canariensis*), 3 spider gum (*Eucalyptus conferruminata*), 1 silver dollar gum (*Eucalyptus polyanthemus*), 1 Hong Kong orchid (*Bauhinia x, blakeana*), 1 cork oak (*Quercus suber*), 1 Mexican fan palm (*Washingtonia robusta*), 1 Senegal date palm (*Phoenix reclinata*), and 1 lemon-scented gum (*Eucalyptus citriodora*).

All graded slopes and the open space areas around the driveway, parking lot, and ADA-compliant path would be revegetated with 38 coast live oak trees (*Quercus agrifolia*), 7 Torrey pine trees (*Pinus torreyana* ssp. *torreyana*), and a mix of native shrubs, nectar plants, and grasses. Native vegetation would replace the non-native stands of mixed eucalyptus and ornamental trees to provide higher-quality habitat to support roosting and overwintering by the monarch butterfly.

The project would require a Boundary Line Adjustment (BLA) to the existing MHPA (Figure 3). The MHPA BLA would remove 0.31 acres and add 0.86 acres to the MHPA east of the project footprint, resulting in a net increase of 0.55 acres inside the MHPA. The MHPA BLA received the required MHPA concurrence by the City and Wildlife Agencies on May 9, 2025.

Grading

In total, 1.42 acres would be graded with approximately 4,000 cubic yards (cy) cut and 370 cy fill, for a net export of about 3,630 cy. Excavation may reach approximately 8.5 feet for the proposed parking lot and 5 feet for the proposed ADA-compliant path. The net increase in impermeable area would be approximately 24,537 square feet.

Stormwater Conveyance

Surface runoff from the parking lot and driveway would drain into the proposed biofiltration basin. The basin would have a maximum capacity of 2,309 cubic feet (within a 962-square-foot area) and an 8-inch perforated polyvinyl chloride (PVC) underdrain at the bottom of the basin. The basin would treat and regulate surface runoff before it enters an 18-inch PVC storm drain, and drain into the existing cobble gutter along Presidio Drive.

Surface runoff from the northern portion of the project site, which comprises the proposed ADA-compliant path and pervious natural terrain, would be directed to the existing cobble gutters along Presidio Drive. To filter runoff from the ADA-compliant path, two-foot-wide gravel strips would line the northern edges of all path segments. Instead of having all of the surface runoff freely sheet flow across the entire northern portion of the project site, the runoff in some drainage areas would be directed to one of two proposed catch basins, into proposed storm drains, and then to a proposed headwall that drains into the existing cobble swale along Presidio Drive.

9. Surrounding land uses and setting:

The 1.60-acre project site is located on a knoll within existing undeveloped land, currently used by the City of San Diego for staging and storage. Just north of the proposed improvements is the Junípero Serra Museum. The museum, designed in 1928, is on the northern edge of Presidio Park, a 40-acre public park owned and operated by the City of San Diego (see Figure 2, Project Location on Aerial Photograph). Recreational areas, such as park tables, benches, and trails, are present throughout the park. The museum and project site is bounded by Taylor Street and Mission Valley to the north and east, Cosoy Way to the south, and Presidio Drive and Jackson Street to the west.

Presidio Park, which overlooks and borders Old Town San Diego to the southwest, was originally the site of a Kumeyaay village. In 1769, the Spanish settled in the area, marking the park as the first European settlement on the West Coast. The site includes several important features that are not designated but date to the construction of the Junípero Serra Museum and contribute to its historic significance, including walkways, site walls, retaining walls, and trees. The park contains other resources that are eligible for historic designation, including Depression-era cobblestone gutters, Inspiration Point, Palm Canyon, and the Serra Cross.

The northern edge of Presidio Park is bounded by I-8. Beyond that is the Mission Valley Preserve and recreational baseball fields. To the south and east of the park is single-family residential housing. To the south and west of Presidio Park are commercial areas, the Presidio Hills Golf Course, Old Town San Diego, and additional residential housing. The nearest residences are approximately 500 feet southeast of the project site.

A portion of the project site (0.31 acres) is within the MHPA, which encompasses Presidio Park in the form of two strips on the eastern and western sides of the park. The MHPA is comprised of both native and naturalized vegetation/land cover types, with predominantly large stands of non-native eucalyptus and other ornamental tree species.

10. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):

U.S. Fish and Wildlife Service – MHPA BLA
California Department of Fish and Wildlife – MHPA BLA

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

In accordance with the requirements of Public Resources Code 21080.3.1, the City of San Diego provided formal notifications to the Lipay Nation of Santa Ysabel, the Jamul Indian Village, and the San Pasqual Band of Mission Indians, which are traditionally and culturally affiliated with the project area, requesting consultation. Formal notification letters were sent via electronic mail on May 13, 2021, for a 30-day period ending on June 14, 2021. No requests for consultation were received, and consultation was concluded.

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

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

- | | | |
|---|--|---|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Public Services |
| <input type="checkbox"/> Agriculture and Forestry Resources | <input type="checkbox"/> Hazards & Hazardous Materials | <input type="checkbox"/> Recreation |
| <input type="checkbox"/> Air Quality | <input type="checkbox"/> Hydrology/Water Quality | <input type="checkbox"/> Transportation |
| <input checked="" type="checkbox"/> Biological Resources | <input type="checkbox"/> Land Use/Planning | <input checked="" type="checkbox"/> Tribal Cultural Resources |
| <input checked="" type="checkbox"/> Cultural Resources | <input type="checkbox"/> Mineral Resources | <input type="checkbox"/> Utilities/Service System |
| <input type="checkbox"/> Energy | <input type="checkbox"/> Noise | <input type="checkbox"/> Wildfire |
| <input type="checkbox"/> Geology/Soils | <input type="checkbox"/> Population/Housing | <input checked="" type="checkbox"/> Mandatory Findings Significance |

DETERMINATION: (To be completed by Lead Agency)

On the basis of this initial evaluation:

- The project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION would be prepared.
- Although the project could have a significant effect on the environment, there would not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION would be prepared.
- The project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- The project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect (a) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (b) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but must analyze only the effects that remain to be addressed.
- Although the project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or (MITIGATED) NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or (MITIGATED) NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the project, nothing further is required.

EVALUATION OF ENVIRONMENTAL IMPACTS:

- 1) A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project specific factors as well as general standards (e.g., the project would not expose sensitive receptors to pollutants, based on a project-specific screening analysis.)
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
- 4) “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from “Earlier Analyses”, as described in (5) below, may be cross-referenced).
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or (mitigated) negative declaration. *Section 15063(c)(3)(D)*. In this case, a brief discussion should identify the following:
 - a. Earlier Analysis Used. Identify and state where they are available for review.
 - b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c. Mitigation Measures. For effects that are “Less Than Significant With Mitigation Measures Incorporated”, describe the mitigation measures that were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project’s environmental effects in whatever format is selected.
- 9) The explanation of each issue should identify:
 - a. The significance criteria or threshold, if any, used to evaluate each question; and
 - b. The mitigation measure identified, if any, to reduce the impact to less than significant.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS – Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The project site is on an elevated portion of Presidio Park. The OTCP does not designate any scenic vistas within the planning area. The Final Environmental Impact Report (FEIR) for the OTCP generally mentions that the hilly topography of Presidio Park provides views of San Diego from Pacific Beach to San Diego Bay; however, these are not designated vistas. The project would include the development of a parking lot, driveway access, and an ADA-compliant path between the proposed parking lot and the Junípero Serra Museum. The proposed structures would be built at ground level; they would not include buildings or other elevated structures that would impede the viewshed of a scenic vista. Additionally, the project would improve accessibility to Presidio Park, increasing opportunities for the public, including people with disabilities, to enjoy scenic vistas available from the site. The project would be conditioned to meet requirements to reduce potential visual impacts pursuant to the City of San Diego’s Land Development Code, Landscape Standards, and Whitebook. Therefore, impacts related to scenic vistas would be less than significant.

b) Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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No officially designated State scenic highways are visible to or from the project site. The California State Scenic Highway System lists portions of I-8 from Arizona to Morena Boulevard as an eligible scenic highway, and portions of the Junípero Serra Museum are visible from I-8; however, this segment is not officially designated. The project would be built at ground level and would not include any structures that would be visible from I-8. It does not include any structures that would impede views of trees, rock outcroppings, or historic buildings from I-8. The project includes the removal of 53 trees, some of which could be visible from I-8. Of these, 45 are suitable for monarch butterfly roosting; therefore, 45 replacement trees would be planted on the project site. Additionally, because of the general down-sloping of the project site toward the south, most of the on-site trees are not visible from I-8. Projects that would block public views from designated open space areas, roads, parks, or significant visual landmarks or scenic vistas (Pacific Ocean, downtown skyline, mountains, canyons, waterways) may result in a significant impact to scenic resources. Since I-8 is not designated as a scenic highway, and the replacement of these trees would not substantially affect views from I-8, impacts would be less than significant.

c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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The project is in a public park in an urbanized area. It would sit on an elevated portion of Presidio Park, from which the public has access to points to view both the project site and the surrounding landscape. The proposed development would be built at ground level and would not include any elevated structures or buildings that would obscure views. The construction of the project would require site grading and the removal of 53 trees. A total of 45 replacement trees would be planted on the project site, including 38 coast live oak trees (*Quercus agrifolia*) and 7 Torrey pine trees (*Pinus torreyana* ssp. *torreyana*). The proposed landscaping would mimic the surrounding vegetation and would include native shrubs and grasses. Overall, the visual changes to the project site would not be substantial, and impacts would be less than significant.

- d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Light and glare can be caused by exterior lighting, illuminated signage, and/or highly reflective building surfaces. The project does not include any reflective surfaces, but it does include 11 pole-mounted outdoor lights. The proposed eleven 13-to-15-foot-tall, pole-mounted streetlights with downcast shades would be placed along the access driveway, the parking lot, and the path leading up to the museum. These lights would be consistent with what is currently in use on-site, including in those areas already within and adjacent to the MHPA. The light would have low illumination and would be shielded so spill over into the MHPA would be minimized. The project would not result in significant new sources of light or glare; therefore, impacts would be less than significant.

II. AGRICULTURAL AND FOREST RESOURCES: In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. – Would the project:

- a) Converts Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

The California Farmland Mapping and Monitoring Program, maintained by the California Department of Conservation, indicates that the project site is in an urban and built-up area. There is no prime farmland, unique farmland, or farmland of statewide importance in the area or on the project site. No impacts would occur.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Conflict with existing zoning for agricultural use, or a Williamson Act Contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The Williamson Act Program is maintained by the California Department of Conservation to preserve agricultural and open space lands. The project site is zoned for open space parks (OTOP-1-1). It is not zoned for farming, nor is it a part of a Williamson Act Contract. No impacts would occur.

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 1220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The site is zoned OTOP-1-1, and it is not zoned for timberland as defined by Public Resources Code Section 1220(g), timberland as defined by Public Resources Code Section 4526, or as timberland production as defined by Government Code Section 51104(g). No impacts would occur.

d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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See response II(c), no land that has been zoned as forest land or timberland exists within the boundaries of the project. Implementation of any project element would not result in a loss of forest land or the conversion of forest land to other uses. Therefore, no impact would occur.

e) Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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See response II(a). Implementation of the project would have no impact on agriculture and/or forestry resources. No agricultural land, forest land, or timberland exists on or in the vicinity of the project area. The project would not involve changes to the existing environment that, because of their location or nature, could result in the conversion of Farmland to non-agricultural use or forest land to non-forest use. Therefore, no impact would occur.

III. AIR QUALITY – Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied on to make the following determinations – Would the project:

a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Project consistency is based on whether the project would conflict with or obstruct implementation of the Regional Air Quality Strategy (RAQS) and/or applicable portions of the State Implementation Plan, which would lead to increases in the frequency or severity of existing air quality violations. The

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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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 and California Ambient Air Quality Standards. The San Diego Air Basin (SDAB) is designated a non-attainment area for the federal and state ozone (O₃) standard. Accordingly, the RAQS was developed to identify feasible emission control measures and provide expeditious progress toward attaining the standards for ozone. The two pollutants addressed in the RAQS are reactive organic gases (ROG) and oxides of nitrogen (NO_x), which are precursors to the formation of ozone. Projected increases in motor vehicle usage, population, and growth create challenges in controlling emissions and, by extension, in maintaining and improving air quality. The 2022 RAQS was most recently adopted in 2023.

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 (RTP) and Sustainable Communities Strategy (SCS). As such, projects that propose development that is consistent with the growth anticipated by SANDAG’s growth projections and/or the City’s General Plan would not conflict with the RAQS. In the event that a project proposes development that is less dense than anticipated by the growth projections, the project would likewise be consistent with the RAQS. In the event that a project proposes development that is greater than anticipated in the growth projections, further analysis would be warranted to determine whether it would exceed the growth projections used in the RAQS for the specific subregional area.

The project site is designated as Park, Open Space, and Recreation in the City’s General Plan and is zoned Open Space - Parks (OTOP-1-1). The project would be consistent with the land use designation and would not include the construction of any new land uses. The project proposes the construction of a new ADA-compliant parking lot and associated paths, sidewalks, and infrastructure to expand parking capacity at an existing museum. The project does not include any growth-inducing components. Furthermore, as described in Section III(b) below, the project would not result in construction or operational emissions in excess of the applicable significance thresholds for all criteria pollutants. As a result, the project would not generate emissions that are not already accounted for in the RAQS. Therefore, the project would not obstruct or conflict with the implementation of the RAQS, and no impact would result from project implementation.

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

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The region is classified as attainment for all criteria pollutants except ozone, particulate matter with an aerodynamic diameter of 10 microns or less (PM₁₀), and particulate matter with an aerodynamic diameter of 2.5 microns or less (PM_{2.5}). The SDAB is a non-attainment area for the 8-hour federal and state ozone standards, and a non-attainment area for 1-hour state ozone standards. Ozone is not emitted directly but is a result of atmospheric activity on precursors. NO_x and ROG are known as the chief “precursors” of ozone. These compounds react in the presence of sunlight to produce ozone.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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The project would result in short-term emissions from construction activities. Long-term air emission impacts are those associated with mobile, area, and energy sources related to any change caused by a project. However, the project would not generate additional trips since the parking expansion meets an existing demand for more equitable museum access and would not cause a substantial increase in museum use. Other operational source emissions would be negligible. Emissions were calculated using the California Emissions Estimator Model (CalEEMod) Version 2022.1 (California Air Pollution Control Officers Association 2022). Emissions were calculated for a parking lot land use.

Construction Emissions

Construction-related activities are temporary, short-term sources of air emissions. Sources of construction-related air emissions include the following:

- fugitive dust from grading activities;
- construction equipment exhaust;
- construction-related trips by workers, delivery trucks, and material-hauling trucks; and
- construction-related power consumption.

Construction-related pollutants result from dust raised during clearing activities and emissions from construction equipment and vehicles. Fugitive dust emissions vary greatly during construction and depend on the amount and type of activity, the silt content of the soil, and the weather. Vehicles moving over paved and unpaved surfaces, excavation, earth movement, grading, and wind erosion from exposed surfaces are all sources of fugitive dust. Construction operations are subject to the requirements established in Regulation 4, Rules 52, 54, and 55 of the SDAPCD's rules and regulations.

Heavy-duty construction equipment is usually diesel-powered. In general, emissions from diesel-powered equipment contain more NO_x, oxides of sulfur (SO_x), and particulate matter than gasoline-powered engines. However, diesel-powered engines generally produce less carbon monoxide (CO) and less ROG than gasoline-powered engines. Standard construction equipment includes tractors/loaders/backhoes, rubber-tired dozers, excavators, graders, cranes, forklifts, rollers, paving equipment, generator sets, welders, cement and mortar mixers, and air compressors. Primary inputs are the numbers of each piece of equipment and the length of each construction stage. Specific construction phasing and equipment parameters are not available at this time. However, CalEEMod can estimate the required construction equipment when project-specific information is unavailable. The estimates are based on surveys (performed by the South Coast Air Quality Management District and the Sacramento Metropolitan Air Quality Management District) of typical construction projects, which provide a basis for scaling equipment needs and schedule with a project's size. Air emission estimates in CalEEMod are based on the duration of construction phases; construction equipment type, quantity, and usage; grading area; season; and ambient temperature, among other parameters. Construction activities are anticipated to occur over approximately a nine-month period. Construction would occur in the following phases: clearing/grubbing/tree removal, grading, concrete work/street light trenching, paving, and planting/irrigation. The construction modeling for the project assumed it would require two dump trucks and a backhoe for tree removal, and grading would require the export of 3,800 cy of soil. It should be noted that, as described in the project description, the project would require an export of 3,630 cy of soil, so the assumptions in

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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this section are conservative. Default CalEEMod construction equipment for site preparation, grading, construction, and paving was modeled. Table 1 summarizes the modeled construction equipment. Table 2 presents the total projected construction maximum daily emission levels for each criteria pollutant.

Construction Phase ¹	Duration (Months)	Modeled Equipment	Amount	Hours per Day
Clearing/Grubbing/Tree Removal (Site Preparation)	1	Grader	1	8
		Rubber Tired Dozer	1	7
		Tractor/Loader/Backhoe	1	8
		Dumpers/Tenders ²	2	8
Grading (Grading)	3	Grader	1	8
		Rubber Tired Dozer	1	8
		Tractors/Loaders/Backhoes	2	7
Concrete Work/Street Light Trenching (Building Construction)	3	Crane	1	6
		Forklift	1	6
		Generator Set	1	8
		Tractor/Loader/Backhoe	1	6
		Welders	3	8
Paving	1	Cement and Mortar Mixer	1	6
		Paver	1	6
		Paving Equipment	1	8
		Roller	1	7
		Tractor/Loader/Backhoe	1	8
Planting/Irrigation (Building Construction)	1	Crane	1	6
		Forklift	1	6
		Generator Set	1	8
		Tractor/Loader/Backhoe	1	6
		Welders	3	8

SOURCE: "AQ and GHG Modeling" (2024).

¹Project Phase (CalEEMod Phase) – Phases were modeled using the CalEEMod default construction equipment for the phase shown in parentheses.

²Default site preparation equipment was modeled with the exception of two additional dump trucks.

For assessing the significance of the air quality emissions resulting from the construction of the project, the construction emissions were compared to the City significance thresholds shown in Table 2. As shown in Table 2, the maximum daily construction emissions associated with the project are projected to be below the applicable thresholds for all criteria pollutants. Therefore, project construction would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard, and impacts would be less than significant.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Phase	Pollutant					
	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Clearing/Grubbing/Tree Removal	1	12	13	<1	3	2
Grading	1	14	15	<1	4	2
Concrete Work/Street Light Trenching	1	9	10	<1	<1	<1
Paving	1	4	7	<1	<1	<1
Planting/Irrigation	2	9	10	<1	<1	<1
Total Maximum Daily Emissions	2	14	15	<1	4	2
<i>Significance Thresholds</i>	<i>137</i>	<i>250</i>	<i>550</i>	<i>250</i>	<i>100</i>	<i>67</i>
ROG = reactive organic gases; NO _x = oxides of nitrogen; CO = carbon monoxide; SO _x = oxides of sulfur; PM ₁₀ = particulate matter with an aerodynamic diameter of 10 microns or less; PM _{2.5} = particulate matter with an aerodynamic diameter of 2.5 microns or less						

Operational Emissions

As discussed, long-term operational air emission impacts are those associated with mobile, area, and energy sources related to any change caused by a project. However, the project would not generate additional trips since the parking expansion meets an existing demand for more equitable museum access and would not cause a substantial increase in museum use. Therefore, the project would not result in an increase in mobile-source emissions. Energy sources include emissions from the combustion of natural gas used for water heating. The project would not be a source of natural gas emissions. Area sources include emissions from the use of landscaping equipment, consumer products (aerosols, cleansers, etc.), and architectural coatings (e.g., parking lot paint). These emissions were calculated using the CalEEMod default values for a parking lot land use. It was calculated that area source of ROG emissions would be less than 0.01 pounds per day, and emissions of other criteria pollutants would not be measurable. Thus, operational emissions associated with project implementation would be negligible, and impacts would be less than significant.

- c) Expose sensitive receptors to substantial pollutant concentrations?

Sensitive land uses include schools and schoolyards, parks and playgrounds, daycare centers, nursing homes, hospitals, and residential communities. There are no sensitive receptors in the immediate vicinity of the project site. Residential uses are located 515 feet to the southeast and 870 feet to the east, and a recreation center is located approximately 590 feet to the west. The two primary emissions of concern regarding health effects for land development projects are diesel-fired particulates and CO.

Construction of the project would result in short-term diesel exhaust emissions from on-site, heavy-duty equipment. Particulate exhaust emissions from diesel-fueled engines (diesel particulate matter or DPM) were identified as a toxic air contaminant by the California Air Resources Board (CARB) in 1998. Generation of DPM from construction projects typically occurs in a single area for a short period. According to the Office of Environmental Health Hazard Assessment, health risk assessments, which determine the exposure of sensitive receptors to toxic emissions, should be

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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based on a 30-year exposure period; however, such assessments should be limited to the period/duration of activities associated with the project (Office of Environmental Health Hazard Assessment 2015). Construction activities would be short-term (9 months) and would only be a fraction of the total exposure period used for health risk calculation. Based on the size of the project and the short duration of construction (9 months), DPM generated by project construction is not expected to create conditions where the probability is greater than 10 in 1 million of contracting cancer for the maximally exposed individual or to generate ground-level concentrations of noncarcinogenic toxic air contaminants that exceed a hazard index greater than 1 for the maximally exposed individual. Additionally, with the ongoing implementation of U.S. Environmental Protection Agency (U.S. EPA) and CARB requirements for cleaner fuels, off-road diesel engine retrofits, and new, low-emission diesel engine types, the DPM emissions of individual equipment would be substantially reduced over time. Construction emissions would be well below applicable thresholds (see Table 2 above) and would disperse quickly with distance to the project site. Given the distance to the nearest sensitive receptor and the short duration of construction, DPM generated by project construction is not expected to result in an excess cancer risk. Therefore, construction would not expose sensitive receptors to substantial pollutant concentrations, and impacts would be less than significant.

A CO hot spot is an area of localized CO pollution that is caused by severe vehicle congestion on major roadways, typically near intersections. CO hot spots have the potential to violate state and federal CO standards at intersections, even if the broader basin is in attainment for federal and state levels. Due to increased requirements for cleaner vehicles, equipment, and fuels, CO levels in the state have dropped substantially. All air basins are attainment or maintenance areas for CO. Therefore, recent screening procedures based on more current methodologies have been developed. The Sacramento Metropolitan Air Quality Management District developed a screening threshold in 2011 that states that any project involving a signalized intersection experiencing 31,600 vehicles per hour or more would require detailed analysis. In addition, the Bay Area Air Quality Management District established a screening threshold in 2010, which states that any project involving a signalized intersection experiencing 44,000 vehicles per hour would require detailed analysis. The nearest signalized intersections to the project site that would be affected by construction-related traffic are the intersections of Taylor Street at Morena Boulevard and Taylor Street at the I-8 ramps. According to SANDAG's Transportation Forecast Information Center (TFIC), these roadways would experience daily traffic volumes of 24,000 or less (SANDAG 2024). A typical peak-hour volume is 10 percent of the daily traffic volume, resulting in a peak hourly segment volume of 2,400 or less. Based on this, intersection traffic volumes would be significantly less than 31,600 vehicles per hour. Further, construction-related traffic would be temporary, and as discussed, the project would not result in an increase in operational traffic. Therefore, the project is not anticipated to result in a CO hot spot, and impacts would be less than significant.

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

During construction, the use of fuels, including diesel, would generate some nuisance odors. However, these odors generated during construction would be temporary and intermittent, would disperse quickly, and would not affect a substantial number of people. The project does not include heavy industrial or agricultural uses that are typically associated with objectionable odors.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Therefore, the project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people, and impacts would be less than significant.

IV. BIOLOGICAL RESOURCES – Would the project:

- | | | | | |
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| <p>a) Have substantial adverse effects, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?</p> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|-------------------------------------|--------------------------|--------------------------|

A Biological Letter Report (BLR) for the Junípero Serra Museum ADA Improvements Project was prepared in December 2025. The City’s biologist conducted an updated survey May 2026 to confirm the survey results of the December 2025 BLR. The City’s Biology Guidelines (City of San Diego 2018) and ESL Regulations define sensitive biological resources as those lands included within the MHPA as identified in the City’s MSCP Subarea Plan (City of San Diego 1997), and other lands outside of the MHPA that contain wetlands; vegetation communities classifiable as Tier I, II, IIIA or IIIB; habitat for rare, endangered, or threatened species; or narrow endemic species.

Sensitive Plant Species

No naturally occurring sensitive plant species were observed within the survey area. While Torrey pine (CRPR 1B.2; MSCP covered species [natural populations]) was observed, the individuals appear to have been planted, would not be considered sensitive, and are located outside of the impact area. As such, the project would not cause adverse effects to sensitive plant species.

Sensitive Wildlife Species

One sensitive wildlife species, monarch butterfly (federal candidate for listing), was detected in the survey area. In addition, five sensitive wildlife species have a moderate to high potential to occur within the survey area. This includes Crotch’s bumble bee (state candidate for listing as endangered), Belding’s orange-throated whiptail (*Aspidoscelis hyperythra beldingi*; CDFW watch list, MSCP covered), San Diegan tiger whiptail (*Aspidoscelis tigris stejnegeri*; CDFW species of special concern), western bluebird (*Sialia mexicana occidentalis*; MSCP covered), and Cooper’s hawk (*Accipiter cooperii*; CDFW watch list, MSCP covered).

Coopers Hawk and Western Bluebird

Cooper’s hawk and western bluebird may be directly impacted by the project if construction activities (e.g., clearing, grubbing, and grading) occur during the nesting season of February 1 to September 15. Potential impacts to Cooper’s hawk and western bluebird would be reduced to less than significant with the implementation of mitigation measure MM-BIO-1. Additionally, species-specific Area Specific Management Directives /Conditions of coverage for Cooper’s hawk would be included as conditions of project approval.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Monarch Butterfly

The project would result in the removal of 41 gum trees and 4 Canary Island pines, which are potentially suitable for monarch butterfly roosting. The project would replace all potentially suitable roosting trees as shown on the project’s landscape plans. The replacement trees would consist of coast live oak and Torrey pine, which would provide mid-story and over-story roosting habitat, with coyote brush (*Baccharis pilularis*) in the understory to provide fall and winter nectar sources. The revegetation would provide higher quality habitat for monarch butterflies than the existing vegetation, which is comprised of non-native trees with limited understory nectar sources. Tree removal would be limited to 1.08 acres of potentially suitable roosting habitat within the 17.60-acre overwintering site. Suitable roosting habitat would remain within the surrounding area to support monarch butterflies during construction and revegetation. In addition, the project would conserve 0.76 acres of potentially suitable roosting habitat (coast live oak woodland, eucalyptus woodland, and non-native woodland) through the project’s MSCP BLA. Impacts to overwintering monarch butterfly would be potentially significant, and mitigation would be required (MM-BIO-1). Implementation of mitigation measure MM-BIO-2 would reduce potential impacts to monarch butterflies to less than significant levels.

Crotch's Bumble Bee

Crotch's bumble bee has a moderate potential to forage within the project impact area due to the presence of nectar sources (e.g., *Salvia mellifera*, *Acmispon glaber*, *Parkinsonia aculeata*) and known foraging location in the project vicinity (i.e., Mission Valley Preserve). This species has a low potential to nest within the project impact area, due to the limited availability of nesting resources such as old mammal burrows and bare ground. The project impact area supports a limited amount of overwintering resources, such as areas of insulated leaf litter. Due to the potential for this species to occur on-site, impacts to Crotch’s bumble bee would be potentially significant and mitigation would be required (MM-BIO-2). Implementation of mitigation measure MM-BIO-3 would reduce potential impacts to Crotch’s bumble bees to less than significant levels.

Impacts

Implementation of the proposed project would potentially impact special status species, including monarch butterfly, Crotch’s bumble bee, and sensitive nesting birds, including Cooper’s hawk and western bluebird. Section V(C) of this Initial Study includes a description of the Mitigation Monitoring and Reporting Program for this project. With implementation of MM-BIO-1, MM-BIO-2, and MM-BIO-3, impacts related to special-status species would be reduced to less than significant.

- b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Implementation of the proposed project would result in impacts to eucalyptus woodland, disturbed land, ornamental plantings, and urban/developed (Table 3). No sensitive vegetation communities would be impacted per the City’s Biology Guidelines (City of San Diego 2018).

Community or Type	City of San Diego Tier	Inside MHPA	Outside MHPA	Total
Eucalyptus woodland	IV	0.31	0.69	1.01
Disturbed land	IV	--	0.07	0.07
Ornamental plantings	IV	<0.01	0.51	0.51
Urban/developed	IV	--	0.04	0.04
Total		0.32	1.30	1.62

¹Impacts are presented in acres, rounded to the nearest 0.01.

Overall, sensitive vegetation communities would not be affected by the project, and impacts are less than significant. No mitigation measures are required.

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

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The cobble gutter along Presidio Drive is part of an existing storm drain system that conveys runoff southward away from the project site. In Palm Canyon, to the east of the project site, is a small ephemeral drainage that empties into a storm drain culvert under Taylor Street and I-8. Surface water flows from this drainage and eventually drains into the San Diego River, a Traditional Navigable Water, to the north. No water was flowing in the drainage at the time of the biological survey. Because the drainage was likely naturally occurring prior to channelization, it would likely be considered non-wetland waters of the state under the jurisdiction of the California Regional Water Quality Control Board (RWQCB) and a streambed under the jurisdiction of the CDFW. The potentially jurisdictional drainage is approximately 285 feet east of the impact footprint (of the project site). As such, the project would not impact potential RWQCB or CDFW jurisdictional resources. See Section X, Hydrology and Water Quality, for more information about project site drainage and water quality. As the project does not remove, fill, hydrologically interrupt, or otherwise substantially affect the water flowing through the cobble channel in Palm Canyon, impacts related to potential jurisdictional waters would be less than significant.

- d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Wildlife movement corridors are defined as areas that connect suitable wildlife habitat areas in a region otherwise fragmented by rugged terrain, changes in vegetation, or human disturbance.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Natural features such as canyon drainages, ridgelines, or areas with vegetation cover provide corridors for wildlife movement.

The project site occupies the northern portion of Presidio Park, bounded by I-8 to the north and dense residential and commercial development to the south and west. Land to the east, along the steep north-facing slopes between Mission Hills and Mission Valley, is undeveloped and has connectivity to an unnamed urban canyon complex to the east. This urban canyon complex consists of several finger canyons that are similarly located on steep slopes, which are bound by I-8, roads, and dense residential development to the north and south, until they reach State Route 163 (SR 163) to the east.

While wildlife occurring in the canyon complex may utilize the eucalyptus woodland on the eastern portion of the project site and the disturbed chaparral habitat to the east of the project site for home range and local movements, the project site is ultimately restricted by development and thus does not provide a throughway for wildlife movement by connecting larger expanses of habitat off-site. Therefore, the project site does not function as a significant regional corridor. Furthermore, the project has been designed to comply with the MSCP General Planning Policies and Design Guidelines and Land Use Adjacency Guidelines, which ensure no indirect impacts to the MHPA would result from the project. As a result, the project would not cause any loss of functionality of a significant regional corridor or result in any indirect impacts to local wildlife movement inside the MHPA; thus, impacts would be less than significant, and no mitigation would be required.

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

The City of San Diego has a public tree protection policy (Policy 900-19) to protect designated tree resources located in the Public Rights-of-Way, on city-owned open space, in parks, or other publicly owned lands. The policy defines protected trees as landmark trees (those with high aesthetic quality), heritage trees (those that are 50 years or older and associated with a historic event, building, or district or were planted by a historically significant person), parkway resource trees (planted groups of trees in public rights-of-way, parking lots, or trails with a consistent design theme), and preservation grove trees (those naturally occurring trees in public rights-of-way, open space, Environmentally Sensitive Land [ESL], or parkland). Preservation grove trees must be at least six in number, be within a quarter-acre area, and be grouped no more than 100 feet apart. They must also be either the same species or similar in form. Nonnative and naturalized trees that are on City-owned designated or dedicated open space containing MHPA lands or Environmentally Sensitive Land would not be eligible for protection under this Policy.

The Tree Survey Letter Report conducted for the project ("Tree Survey Letter Report for Junipero Serra Museum Americans with Disabilities Act (ADA) Improvements Project" (Recon Environmental, 2025)) determined that 53 trees are located within the project site, 13 of which are in the MHPA. These 13 trees would not be considered preservation grove trees in accordance with Council Policy 900-19. The remaining trees could be considered to be preservation grove trees because, although most are nonnative gum trees, they are naturalized to the area. Additionally, as described in Section IV(a), 93 of the on-site trees are suitable for monarch butterfly roosting. Of these 93 suitable trees,

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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45 trees would be removed as a result of the project, but would also be replaced with 38 coast live oak trees and 7 Torrey pine trees. These 45 replacement trees would be more than the 39 (53 on-site trees minus the 13 in the MHPA) trees that could qualify as preservation grove trees. Therefore, this replacement would satisfy the requirements of the Council Policy 900-19, and impacts related to local policies or ordinances protecting biological resources would be less than significant.

- f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

MHPA and MSCP

The project would impact a total of 0.31 acres inside the MHPA (see Figure 3 and Table 4). These impacts would be limited to a small area of eucalyptus woodland and ornamental plantings, and no sensitive vegetation communities within the MHPA would be affected. As mentioned above, there is ongoing park maintenance activity in this area. The project includes an MHPA BLA, which received the required City and Wildlife Agency concurrence on May 9, 2025. The MHPA deletion and addition areas for the MHPA BLA are shown in Figure 7, and the effect on vegetation community acreages (net addition of 0.86 acres to the MHPA) is shown in Table 4.

Vegetation Community	City of San Diego Tier	MHPA Subtraction	MHPA Addition	Net Change
Coast live oak woodland	I	--	+0.21	+0.21
Disturbed southern mixed chaparral	IIIA	--	+<0.004	+<0.01
Eucalyptus woodland	IV	-0.31	+0.47	+0.16
Non-native woodland	IV	--	+0.15	+0.15
Non-native vegetation	IV	--	--	--
Disturbed Land	IV	--	+0.02	+0.02
Ornamental plantings	IV	-<0.004	--	-<0.01
Urban/Developed	None	--	+0.01	+0.01
TOTAL ACRES		-0.31	+0.86	+0.55

Section 5.4.2 of the Final MSCP Plan describes the process for adjustments to the MHPA boundary, establishing the “like or equivalent” exchange concept. Under this section, the MHPA boundary may be adjusted, provided the adjustment would result in the same or higher biological value within the MHPA. This requires findings of equivalence for six biological factors, which are discussed in detail in the Biological Letter Report for the Junípero Serra Museum ADA Improvements Project (see “Biological Letter Report for the Junipero Serra Museum Americans with Disabilities Act Improvements Project” (RECON Environmental, 2025)). Overall, the project would have a neutral and/or beneficial impact related to these six biological factors. The BLA would result in a less-than-significant impact related to the existing MHPA and received required MHPA BLA concurrence on May 9, 2025.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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MHPA Land Use Adjacency Guidelines

Because the project would occur within and adjacent to the MHPA, it would be required to comply with the MHPA Land Use Adjacency Guidelines. Conformance with each of the Land Use Adjacency Guidelines categories (drainage, toxics, lighting, noise, barriers, invasives, brush management, and grading/land development) is discussed in full detail in the “Biological Letter Report for the Junipero Serra Museum Americans with Disabilities Act Improvements Project” (RECON Environmental, 2025).

Prior to issuance of any construction permit or contract award, ED, and/or MSCP staff shall verify the Applicant has accurately represented the project’s design on the Construction Documents in conformance with the associated discretionary permit conditions and Exhibit “A” and the City’s MSCP MHPA Land Use Adjacency Guidelines. An implementing plan shall be provided that includes references on the Construction Documents of the following: drainage, toxics, lighting, noise, barriers, invasives, brush management, and grading/land development. As discussed in the “Biological Letter Report for the Juniper Serra Museum Americans with Disabilities Act Improvements Project” (RECON Environmental, 2025), the project would not conflict with any of the MHPA Land Use Adjacency Guidelines; implementation of the MHPA’s Land Use Adjacency Guidelines would be included as a condition of project approval.

V. CULTURAL RESOURCES – Would the project:

- a) Cause a substantial adverse change in the significance of an historical resource as defined in §15064.5?

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

See also Section V. b) for the discussion of archaeological resources. A Historical Resources Survey was prepared for the project, “Historical Resources Survey for the Junipero Serra Museum ADA Improvements Project” (RECON Environmental, 2025). The Historical Resources Survey incorporated the findings of the November 2020 Historical Resources Technical Report (HRTR), prepared by Heritage Architecture and Planning, “Junipero Serra Museum ADA Improvements Project Historical Resources Technical Report). The findings of these reports have been incorporated into this MND.

The records search revealed 177 previously recorded cultural resources within a half mile of the project. Two previously recorded cultural resources occur within the APE, P-37-000038 and P-37-03826. Site P-37-038268, the Works Progress Administration (WPA)-era cobble gutters, are historic resources. Site P-37-000038 comprises the historic components of the Junipero Serra Museum.

Junipero Serra Museum (P-37-000038) Significance

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Site P-37-000038 is listed as California Historical Landmark (CHL) #59. In 1966, It was also added to the National Register of Historic Places as #6600226 as being eligible under Criterion A for its association with exploration and settlement of San Diego with a significance period of 1769–1799. It contains Colonial Spanish, Mexican, Native American, and early American remains. The project impact area intersects with a small portion of this resource. The resource consists of midden soils, lithics, ceramics, hearth features, and fallen walls that are currently buried under 4,000 cy of inorganic yellow soil to protect the walls and covered with topsoil and mulch.

As described in the HRTR, the project includes the construction of an ADA-compliant path that would connect the main terrace of the Junípero Serra Museum to the proposed ADA-compliant parking lot. The Junípero Serra Museum, a Mission Revival-style structure with a four-story domed tower, and Presidio Park are listed on the City of San Diego’s Register of Historical Resources [Historic Resource Board (HRB) #4 – Presidio of San Diego Site; HRB #35 – Presidio Excavation Site, HRB #237 – Junípero Serra Museum, and HRB #240 – Presidio Park]. Presidio Park is also listed in the National Register of Historic Places (#6600226, October 15, 1966) and is a California Historical Landmark (#59, March 7, 1968).

The historic components of the Junípero Serra Museum identified in the HRTR include an original 1929 concrete retaining wall and four potentially historically significant trees that could be impacted by the project. The four-foot-wide section of the 1929 concrete retaining wall is between the south stairs and the main terrace of the Junípero Serra Museum. Based on a 2013 landscape architecture assessment by KTUA, which was incorporated into the 2020 HRTR, four trees were identified as either historically significant or moderately significant (see “Junipero Serra Museum ADA Improvements Project Historical Resources Technical Report (RECON Environmental, 2025)).

The historically significant trees are a cluster of Senegal date palms and a European olive tree near the historic walkway that connects the museum with the existing parking lot across Presidio Drive. The moderately significant trees are a European olive tree and a cork oak tree near the same walkway. The historically significant European olive tree and the Senegal date palms would be avoided through site design. The moderately significant European olive tree is no longer on-site and is presumed removed since the 2013 KTUA landscape architecture assessment. The moderately significant cork oak tree would be removed by the project to accommodate the proposed ADA-compliant path.

Cobble Gutters (P-37-038268) Significance

Site P-37-038268 consists of WPA-built rock features from 1935. These features include cobble-lined gutters along Presidio Drive and Cosoy Way, a cobble-lined channel at the eastern end of the project site, and cobble steps on the southern portion. The two-foot-wide cobble-and-cement gutters extend past the 1.60-acre project impact area. The six-foot-wide cobble-and-cement channel has a trapezoidal cross section. In other words, the channel is wider at the top and narrower at the bottom. The channel starts at the south end of the survey area, with a cobble-lined retaining wall, and ends at a culvert on Taylor Street at the north end. The cobble stairs consist of four treads. Some of the cobbles have been spray-painted, likely to help with visibility.

P-37-038268 is recommended as eligible under California Register of Historical Resources Criterion 2 and the City’s Historic Resources Regulations (HRB) Criterion A because of its association with the

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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WPA era, which was part of President Roosevelt’s New Deal that made significant contributions in bringing unemployment relief to San Diego, California, and the nation after the Great Depression. The gutters also qualify under California Register of Historical Resources Criterion 3 and the City’s Criterion C because the gutters were constructed using the WPA’s typical roadside, aesthetically pleasing and time-intensive method of using stones and cement. Additionally, the gutters are contributing elements to the City Register of Historical Resources-listed Junípero Serra Museum and retain good integrity.

Junípero Serra Museum (P-37-000038) Impacts

The removal of the four-foot-wide section of the original 1929 concrete retaining wall would be minimal and reversible and therefore would not be a significant impact. The cork oak tree that would be removed to accommodate the proposed ADA-compliant path is about 30 years old and considered moderately historically significant. This tree is not being replaced on-site; however, 45 of the 53 trees being removed by the project would be replaced. Therefore, because of the cork oak tree’s moderately historical significance and the proposed planting of 38 coast live oak trees in the same general area as the removed cork oak, this impact would be less than significant. Although visibility of the new walkway and lighting will impact some views, the proposed project is not expected to have a significant, indirect or cumulative impact to the Junípero Serra Museum.

Cobble Gutters (P-37-038268) Impacts

Potentially significant impacts associated with P-37-038268 would be minimized through project design. The proposed driveway would cross the mapped boundary of P-37-038268, where it connects to Presidio Drive. The impacted section of the cobble gutter would be removed and replaced with a reconstructed concrete swale with hand-placed cobbles to match the existing gutter. The proposed concrete-and-cobble swale at the base of the proposed driveway would remain contiguous with the cobble gutter along Presidio Drive. The design of the proposed concrete-and-cobble swale would allow surface runoff to continue to flow along the gutter while also maintaining durability to support vehicles entering the driveway. Therefore, the project would not result in adverse effects to P-37-038268.

Adherence to *The Secretary of the Interior’s Standards for Rehabilitation* will be conducted, which will enable the Junípero Serra Museum to continue to convey its architecture, retaining a high degree of its integrity of design, workmanship, materials, feeling, location, setting, and association, for which the property received its designation. The Junípero Serra Museum and the WPA cobble gutters are historically significant resources as defined by CEQA Guidelines Section 15064.5; however, potential for impact would be less than significant, and no mitigation is required.

- b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

A field survey was conducted on March 27, 2024, by RECON Environmental, Inc. (RECON) archaeologist Nathaniel Yerka, accompanied by Alisha Pico, a Native American representative from Red Tail Environmental. During the pedestrian surveys of the project impact area, no artifacts were found. During a geoarchaeological investigation of the project impact area in 2019, a series of 2.5-

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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inch diameter cores were drilled based on the results of a ground-penetrating radar (GPR) survey completed in 2018. Three cores were within the boundary of P-37-000038, and the remaining 17 cores were located south of P-37-000038 but within the project impact area. No artifacts were recovered from the geoarchaeological cores. Additionally, two one-by-one units were excavated in 2021 to further investigate two anomalies identified during the GPR survey. Unit excavations yielded 5 pieces of debitage, fish bone, shellfish, and modern bottle glass, an aluminum beer can ring tab, plastics, and metal can fragments.

Despite P-37-000038 being listed as a CHL and on the National Register of Historic Places, the portion of P-37-000038 within the project impact area lacks an intact cultural deposit. The project impact area within the mapped boundary of P-37-000038 was investigated in 2021 using ground-penetrating radar, geoarchaeological coring samples, a pedestrian survey, and subsurface testing, with the conclusion that no significant cultural resources were observed (RECON Environmental, Inc., 2025). The project would not result in adverse effects to P-37-000038. However, due to the potential to unearth unknown archaeological deposits during ground disturbance, impacts to archaeological resources would be potentially significant.

Incorporation of the mitigation measure MM-CUL-1 in Section V(C) of this Initial Study, which requires the presence of a qualified archaeologist and a Native American monitor during earth-moving activities, would reduce impacts related to archaeological resources to less than significant.

- | | | | | |
|---|--------------------------|-------------------------------------|--------------------------|--------------------------|
| c) Disturb any human remains, including those interred outside of dedicated cemeteries? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|-------------------------------------|--------------------------|--------------------------|

Although the potential for buried human remains is low within the project impact area, the archaeological and historic significance of P-37-000038 and the site's importance as a tribal cultural resource for Native Americans could result in the uncovering of remains during the construction of the project, and impacts related to disturbing human remains would be potentially significant. The MMRP in Section V(C) of this Initial Study requires the presence of qualified archaeological and Native American monitors during earth-moving activities (MM-CUL-1). With the implementation of MM-CUL-1, impacts related to human remains would be less than significant.

VI. ENERGY – Would the project:

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

During construction, energy use would fall into two general categories: fuel use from vehicles used by workers commuting to and from the construction site, and fuel use by vehicles and other equipment to conduct construction activities. Energy use associated with the project was calculated as part of the air quality and greenhouse gas (GHG) modeling detailed in Sections III and VIII. Workers associated with project construction would generate trips during project construction. Fuel consumption associated with construction worker commutes would be similar of any other typical commute in San Diego County. Fuel use associated with construction workers and materials delivery

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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during construction is necessary to get workers and building materials to the project site and is not considered to be wasteful, inefficient, or unnecessary.

Additionally, during project construction, the California Air Resources Board regulates idling for commercial motor vehicles to reduce unnecessary energy consumption under 13 California Code of Regulations Section 2485, Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling. Locally, Administrative Regulation 90.72, Motive Equipment Idling Reduction Policy, applies to all City employees operating motive equipment owned or leased by the City. This regulation states that idling of motive equipment shall be prohibited unless "mission necessary." Through the implementation of these measures, energy consumption during construction would be less than significant.

Operational energy use would result from museum visitors traveling to and from the proposed parking lot in motor vehicles. Since the project would provide nine additional parking spaces, five of which would be ADA accessible, for the Junípero Serra Museum, it fills an existing need to provide more equitable accessible parking. It would not substantially increase the number of vehicles coming to the project site and would therefore not cause an increase in energy use resulting from driving. Other uses of the project site, such as landscaping, would include plant trimming and maintenance, leaf blowing, and irrigation. The equipment used for these activities would not require a substantial amount of energy resources.

Overall, constructional and operational energy use would not be wasteful, inefficient, or unnecessary; impacts would be less than significant.

- b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

The project is required to comply with the City's Climate Action Plan (CAP), which is demonstrated through the CAP Memo prepared for the project (City of San Diego 2025). Therefore, the project would not obstruct a state or local plan for renewable energy or energy efficiency. Impacts would be less than significant.

VII. GEOLOGY AND SOILS – Would the project:

- a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
 - i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

A geotechnical investigation for the project, "Geotechnical Investigation Junipero Serra Museum ADA Improvements" (SCST, LLC, 2019), was prepared. As determined in the investigation, there are no

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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known active earthquake faults underlying the project site. The nearest fault is the Rose Canyon fault, which is approximately 800 feet southwest of the project site. The project site is not located in an Alquist-Priolo Fault Zone. In addition, the project would be built in accordance with Chapter 14, Article 5 of the San Diego Municipal Code (SDMC), which codifies and implements the California Building Code (CBC) and details the engineering design and standard construction practices to ensure that potential impacts in this category based on regional geologic hazards would remain less than significant.

ii) Strong seismic ground shaking?

The proximity of the Rose Canyon fault, 800 feet to the southwest of the project site, could cause ground shaking due to movement along the active fault. The geotechnical investigation prepared for the project identifies the parameters of a maximum potential earthquake and recommendations to reduce the potential effects of seismic ground shaking (see "Geotechnical Investigation Junipero Serra Museum ADA Improvements" (Nasland Engineering, 2025)). The project would be required to be constructed in accordance with current engineering practices and codes (CBC, the City's Land Development Code, and the SDMC Article 5, Division 18, which requires adherence to the geotechnical investigations). Adherence to these codes and regulations would reduce ground shaking impacts to less than significant levels.

iii) Seismic-related ground failure, including liquefaction?

Liquefaction occurs when loose, saturated sands and silts are subjected to strong ground shaking. The soils lose shear strength and become liquid, resulting in large total and differential ground surface settlements and possible lateral spreading during an earthquake. Given the dense nature of the materials beneath the project site and due to the lack of a shallow groundwater table, the potential for liquefaction and dynamic settlement to occur is low. Impacts from seismic-related ground failure would be less than significant.

iv) Landslides?

The geotechnical investigation prepared for the project did not find evidence of landslides or slope instabilities; however, a previous 2008 study noted that the Presidio Park area is underlain by an ancient landslide (see "Geotechnical Investigation Junipero Serra Museum ADA Improvements" (Nasland Engineering, 2025)). In 2014, a separate study provided a detailed fault and landslide study of the Presidio Park area and noted that although probable ancient landslides do exist in the Presidio Park area, the mapped landslides are much smaller in size than those mapped in 2008. The 2014 mapped landslide areas are outside of the project limits. The potential for landslides or slope instabilities to occur at the project site is considered low. Impacts related to landslides are less than significant.

b) Result in substantial soil erosion or the loss of topsoil?

Topsoil erosion could occur on slopes within the project site. The geotechnical investigation prepared for the project includes recommendations to reduce slope erosion. Some of these,

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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including preventing water from flowing over the top of a slope and planting vegetation on slopes, would reduce the potential for erosion. Site drainage recommendations have been incorporated into the project's best management practices (BMPs) as part of the drainage plan. Compliance with BMP-1, the proposed drainage plan (see Appendices G and H), and local and state building codes would reduce substantial soil erosion. As such, the project would not result in significant impacts related to soil erosion or loss of topsoil.

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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See Section VII(a)(iii) in regard to liquefaction and lateral spreading and Section VII(a)(iv) in regard to landslides. The project site is not located in an area of known subsidence associated with fluid withdrawal (groundwater or petroleum); therefore, the potential for subsidence due to the extraction of fluids is considered low. Impacts related to unstable soils are less than significant.

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Expansive soils are typically clayey soils that undergo excessive volume changes in response to changes in moisture levels. The geotechnical investigation determined that on-site sandy, clay soils could exceed expansion index criteria (i.e., have an expansion index greater than 20). Recommendations in the investigation include ensuring that the top two feet of soil under hardscape, pavement, and retaining wall footings should have an expansion index of 20 or less in accordance with American Society for Testing and Materials Standard D4829 (Article 5, Division 18 of the SDMC). Adherence to this regulation, which could include reinforcing soil with granular, free-draining material as described in the geotechnical investigation (see "Geotechnical Investigation Junipero Sera Museum ADA Improvements Project" (RECON Environmental, 2025)), would reduce impacts related to expansive soils to less than significant levels.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The project would not include any land uses that generate sewer water or wastewater. No sewer or wastewater systems are proposed as part of the project, and septic tanks or other alternative wastewater disposal systems are required. No impacts related waste water disposal would occur.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Boring of the project site indicates that the soil comprises loose to medium-dense silty to clayey sand and soft to stiff sandy clay, with varying amounts of gravel and cobbles. The project site is underlain by very old paralic (marine or estuary) deposits of weathered, moderately to strongly cemented silty sandstone, which has a high probability of containing important paleontological resources. In addition, the site is adjacent to the Mission Valley formation, with a high potential for resources.

The City's Significance Determination Thresholds state that paleontological monitoring during grading activities may be required if it is determined that the project's earth movement quantity exceeds the paleontological threshold (earth movement greater than 1,000 cy and 10 feet deep for formations with a high sensitivity rating). Monitoring may be required for shallow grading (i.e., less than 10 feet below surface level) when a site has previously been graded, and/or unweathered geologic deposits, formations, or rock units are present at the surface. If there are sedimentary rocks, such as those found in the coastal areas, they usually contain fossils.

Based on the estimated grading quantities (3,630 cy of export and 8.5 feet of depth), prior grading at the site, proximity to the coast, and location within and adjacent to high-potential resource formations, mitigation would be required. With implementation of the City's paleontological monitoring requirements (MM-PALEO-1), the potential for impacts is mitigated to less than significant.

VIII. GREENHOUSE GAS EMISSIONS – Would the project:

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

The project is required to comply with the City's Climate Action Plan (CAP), as demonstrated by the CAP Memo prepared for the project (City of San Diego, 2026). Therefore, the project would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.

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|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

Refer to Section VIII(a) above. Project impacts associated with plan consistency would be less than significant.

IX. HAZARDS AND HAZARDOUS MATERIALS – Would the project:

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a) Create a significant hazard to the public or the environment through routine transport, use, or disposal of hazardous materials? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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The main project components include a parking lot, driveway, and ADA-compliant path. The construction of the project would involve transporting excess soil resulting from site grading.

Project construction activities may require the use of potentially hazardous materials (fuels, lubricants, solvents, etc.) that would require proper storage, handling, use, and disposal. The Department of Toxic Substances Control implements regulations for the proper storage, handling, use, and disposal of hazardous materials (California Code of Regulations, Title 22, Division 4.5), Construction specifications would follow these requirements for the contractor regarding where routine handling or disposal of hazardous materials could occur and what measures to implement in the event of a spill from equipment. Compliance with contract specifications would ensure that potential hazards are minimized to below a level of significance. The project would also be required to adhere to the City's Whitebook Section 5-15, "Encountering or Releasing Hazardous Substances."

The operation of the project site would include the public's use of the parking lot and ADA-compliant path; it would not include any routine transport, use, or disposal of any hazardous materials.

Overall, impacts related to the routine transport, use, or disposal of hazardous materials would be less than significant.

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|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

The project site was evaluated on the California Department of Toxic Substances Control EnviroStor database, which, pursuant to Government Code section 65962.5, lists Federal Superfund, State Response, Voluntary Cleanup, School Cleanup, Hazardous Waste Permit, and Hazardous Waste Corrective Action sites. The project site was evaluated on the California State Water Resources Control Board's GeoTracker database, which lists unauthorized release from leaking underground storage tank sites. According to the EnviroStor and GeoTracker databases, there are no listings within 1,000 feet of the project site.

As described in Section IX(a), project construction would involve the use of materials that are not acutely hazardous, and the project would be consistent with applicable federal, state, and local regulations pertaining to the proper use of these common hazardous materials. Once completed, the project would not use any hazardous materials. Therefore, the project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, and impacts would be less than significant.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The nearest school site is the Old Town Academy, a charter school approximately 0.9 miles away at the intersection of San Diego Avenue and Bandini Street. There are no existing or proposed school sites within one-quarter mile of the project site. No impacts related to the emission or handling of hazardous materials within one-quarter mile of a school would occur.

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The project site is not included on a list of hazardous materials sites pursuant to Government Code Section 65962.5 (the "Cortese List"). No impacts related to hazardous materials lists would occur.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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San Diego International Airport is the nearest airport to the project site (1.3 miles to the south). This airport has an airport influence area, as shown on Exhibit 1-1 in the *San Diego International Airport Land Use Compatibility Plan* (April 2014). The project site is within the airport influence area, Review Area 2, which has policies and standards for only airspace protection and overflight; it does not have the same safety zone and noise contour policies and standards as Review Area 1. The project site is also within the airspace protection boundary for the Naval Air Station on North Island, as shown in Exhibit 1 of the *Naval Air Station North Island Airport Land Use Compatibility Plan* (October 2020). Similarly, with San Diego International Airport, projects within this airspace protection boundary must follow policies and standards that limit interference with the airspace and overflight area. Because of the relative distance from the airport and the proposed uses (a parking lot and an ADA-compliant path), the project would not result in a significant safety hazard or excessive noise impact. Impacts related to airports and/or an airport land use plan would be less than significant.

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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During construction, Presidio Drive may be temporarily blocked to allow the movement of construction equipment on and off the project site. This could temporarily block emergency access along Presidio Drive and to the project site. As required by Article 9, Division 7 of the SDMC, the City requires the implementation of a Traffic Control Plan/Permit whenever construction encroaches a

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Public Right-of-Way. The Traffic Control Plan/Permit outlines the requirements for conducting construction operations, the responsible parties for implementing control measures, and the appropriate practices to be implemented. Adherence to the requirements of the Traffic Control Plan/Permit during construction would reduce the potential for project construction to substantially impair emergency access. This would result in less than significant impacts related to emergency access.

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|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

Presidio Park, including the project site, is within a Very High Fire Hazard Severity Zone. Since the project does not include the construction of any inhabitable structures, it does not bring additional people to the project site. It would therefore not cause a significant additional risk of exposing people or structures to wildland fires. The building materials—concrete, stone, and metal—are not considered to be flammable materials, and implementation of the project would remove potentially flammable vegetation from the project site. Overall, impacts related to wildland fires would be less than significant.

X. HYDROLOGY AND WATER QUALITY - Would the project:

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| a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

Since the project involves more than one acre of ground disturbance, a stormwater pollution prevention plan (SWPPP) would be required for construction activities in accordance with the National Pollution Discharge Elimination System (NPDES) permit program. The SWPPP would include specifications to limit the discharge of pollutants such as dirt and sediment, oils, grease, lubricants, and chemicals into on-site water runoff. The project’s impacts related to wastewater discharge requirements would be less than significant.

A Storm Water Quality Management Plan was prepared for the project (Nasland Engineering, 2025). With the project, on-site runoff would drain away from the project site to be collected in the local stormwater system and flow ultimately to the San Diego River. The project proposes replacing 24,537 square feet of pervious surface with 24,537 square feet of impervious surface. Drainage from the parking lot, and driveway would be directed into the proposed biofiltration basin on the south side of the site. From the basin, it would be treated and then directed into the existing cobble drainage channels along Presidio Drive. Surface runoff from the northern portion of the project site would be directed to the existing cobble gutters along Presidio Drive. In order to filter the runoff from the ADA-compliant path, two-foot-wide gravel strips would line the northern edges of all path segments. Instead of having all of the surface runoff freely sheet flow across the entire northern portion of the project site, the runoff in some drainage areas would be directed to one of two proposed catch basins, into proposed storm drains, and then to a proposed headwall that drains into the existing cobble swale along Presidio Drive.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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The SWQMP includes BMP-1 to improve water quality during project operations. BMP-1, the proposed biofiltration retention basin at the base of the proposed driveway where it intersects with Presidio Drive, would retain and treat runoff from the driveway and parking lot. Runoff from the northern portion of the project site, comprising the proposed ADA-compliant path and pervious terrain between the path segments, would drain as described above under “Operational Water Quality” in Section X(a).

The project drainage plans have been designed to mimic the existing, natural flow of stormwater off the project site. With the implementation of the proposed drainage plan, stormwater runoff would be treated before being released into downstream waters, which would ensure the impacts related to water quality would be less than significant.

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| b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
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The groundwater level is expected to be greater than 20 feet below the ground surface. Groundwater was not encountered in the borings completed for the geotechnical investigation, so the groundwater table is expected to be below a depth that would influence the planned construction (SCST 2019). The project would not require the use of groundwater. The project would add 24,537 square feet of impervious surface to the project site; however, the remainder of the project area would allow precipitation to filter into the ground. Runoff on the impervious surfaces would either be diverted to a pervious area, to the existing cobble gutters along Presidio Drive, or to the proposed on-site biofiltration basin and then into the existing cobble gutters, as detailed in Section X(a). The decrease in groundwater replenishment would not be significant. Therefore, impacts related to groundwater would be less than significant.

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| c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner which would: | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
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See Section X(a) for a discussion of the proposed on-site drainage plan. Implementation of the drainage plan, including the proposed biofiltration retention basin, would ensure that the project would not substantially alter the existing drainage pattern or flow rate of the project site, and there are no on-site streams or rivers. Impacts related to surface drainage patterns would be less than significant.

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| i) result in substantial erosion or siltation on- or off-site; | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
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Proposed grading activities during construction would increase the amount of bare ground and, therefore, the amount of silt and loose soil on the project site. A SWPPP would be prepared for the proposed construction activities. This SWPPP would include policies and standards to reduce the

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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amount of siltation and erosion that could result from the project construction. The implementation of the SWPPP would ensure that construction-related impacts from erosion or siltation would be less than significant.

The landscaping plan for the project site would include plantings of 45 replacement trees, native shrubs, and grasses. This would reduce the amount of loose soil on the project site to prevent substantial erosion and siltation. Impacts would be less than significant for both construction- and operation-related erosion and siltation.

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| ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site; | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
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The project would be designed with a stormwater conveyance system that mimics the existing drainage conditions. As described in Section X(a), stormwater would either drain into the proposed biofiltration system or be directed to the self-mitigating dispersion area north of the project site. The project would add 24,537 square feet of impervious surface to the project site. To account for this increase, a drainage plan and SWQMP have been prepared for the project site to accommodate the increase in surface runoff [see Section X(a)]. The proposed stormwater conveyance system has been designed to accommodate a 100-year flood event. With the proposed infrastructure, the impacts related to on- or off-site flooding would be less than significant.

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| iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
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As described in Section X(a), the project proposes a total of 24,537 square feet of impervious surface to replace the existing permeable surface. Generally, impervious surfaces increase surface runoff. The proposed site drainage would mimic the existing drainage, with the addition of a proposed stormwater drainage system to capture runoff from the parking lot, sidewalks, and driveway. Runoff from the northern portion of the project site, comprising the proposed ADA-compliant path and pervious terrain between the path segments, would drain as described above under "Operational Water Quality" in Section X(a). The project would not exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; impacts would be less than significant.

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| iv) impede or redirect flood flows? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
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As described in Section X(a), the project proposes a total of 24,537 square feet of impervious surface to replace the existing permeable surface. As a result of the proposed impervious parking lot, path, and driveway, the direction of surface waters would change. The proposed stormwater conveyance infrastructure is designed to mimic the existing flow of surface runoff, and the proposed changes would not cause a substantial redirection of runoff, in general or in the event of a 100-year flood. Impacts would be less than significant.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

As shown on the Federal Emergency Management Agency’s Flood Insurance Rate Map for the area (map number 06073C1614H), the project site is not within a flood hazard zone. It is also not in a tsunami risk zone (California Department of Conservation 2022). Seiches tend to occur on enclosed bodies of water, such as lakes, which do not occur on or near the project site. No impacts in flood, tsunami, or seiche zones would occur.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The project would not conflict with or obstruct the implementation of a water quality control plan or a groundwater management plan. A SWQMP has been developed for the project site, and its implementation would not interfere with any water quality control plans. The project would not use or affect groundwater supplies. Therefore, impacts related to conflicts with water quality and groundwater management plans would be less than significant.

XI. LAND USE AND PLANNING – Would the project:

a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The proposed parking lot, driveway, and ADA-compliant path would be built on undeveloped land next to the existing Junipero Serra Museum in an open space park. There are no established communities in this area; therefore, the project would not physically divide an established community. No impacts would occur.

b) Cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Old Town San Diego Community Plan

The project site is within the Old Town San Diego Community Plan (OTSDCP) area in the City of San Diego. The community plan has land use policies that are designed to minimize environmental impacts, especially regarding Environmentally Sensitive Lands (ESL). A consistency analysis is provided in Table 5.

Table 5 Old Town San Diego Community Plan Consistency Analysis	
Applicable Policies	Consistency Analysis
Chapter 3.3: Land Use, Presidio Subdistrict	
LU-3.3: Support the preparation of the Presidio Park Master Plan and Natural Resource Management Plan	Consistent. The project would generally support the improvement of pedestrian access within Presidio

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Table 5 Old Town San Diego Community Plan Consistency Analysis				
Applicable Policies		Consistency Analysis		
<p>to preserve, protect and enhance the park and the historical and cultural resources it contains.</p> <p>a) Create a pedestrian connection along Jackson Street between Presidio Drive and Mason Street to improve access to the recreation center.</p> <p>b) Study alternatives to the existing park circulation system design that could improve pedestrian and bicycle access within Presidio Park.</p> <p>c) Develop a trail plan to enhance trails and paths into and within Presidio Park to improve accessibility and connectivity from Old Town San Diego to open space areas and scenic overlooks.</p> <p>d) Support the removal of nonnative, nonhistorical vegetation and the preservation and maintenance of native and sensitive habitats and plant species in open space areas to reestablish a visual link between Old Town San Diego State Historic Park and the Presidio.</p>	<p>Park because it would improve ADA-compliant accessibility from a new parking lot to the Junípero Serra Museum. The project does not include improvements or alterations to other trails within the park, so these criteria would neither be met nor impacted by the project.</p> <p>Regarding subpoint (d), the project would not remove any historical trees. It would, however, replace mature trees impacted by the project with native coast live oak trees and Torrey pine trees that support the existing monarch butterfly roosts. Native shrubs and grasses are also included in the landscape plan. These plants would support the historic character of the project area within Presidio Park.</p>			
<p>LU-3.4: Support the removal of architectural barriers to provide greater accessibility to the Serra Museum in a manner that does not detract from the architectural character of the building and the Presidio site.</p>	<p>Consistent. The project would improve accessibility to the Junípero Serra Museum with the implementation of the proposed ADA-compliant path and parking lot. Where the path reaches the existing path near the museum, a small section of a 3-foot-tall wall would be removed to allow access to the existing path. The edges of the existing wall that would be exposed after the section is removed would be replastered and painted to match the existing wall finish.</p>			
Chapter 4: Mobility				
<p>ME-1.1: Improve pedestrian connections and accessibility between historical and cultural attractions, parks, and the Old Town Transit Center.</p>	<p>Consistent. The project would not provide connections between different historical and cultural sites, but it would provide greater accessibility to the Junípero Serra Museum. The project does not necessarily support this policy, but it does not conflict with it.</p>			
<p>ME-1.2: Install, replace, and retrofit curb paths throughout the community, ensuring that they do not detract from the community's historical character.</p>	<p>Consistent. Presidio Drive, the main road providing access to the project site, has no sidewalks or existing curb paths. A curb path would be included in the project connecting the ADA path to the parking lot.. This path would meet ADA requirements, and the design would be consistent with the proposed sidewalk.</p>			
Chapter 5: Site Design				
<p>UD-4.8: Design paths to delineate and enhance the pedestrian access into and around buildings and parking areas.</p>	<p>Consistent. The project would provide ADA accessibility between a proposed parking lot and the Junípero Serra Museum.</p>			
<p>UD-4.14: Incorporate pedestrian-scaled lighting fixtures along paths, including wall or post-mounted lighting fixtures.</p>	<p>Consistent. As shown in the proposed lighting plan and described in the project description, the project would include eleven 13-to-15-foot pole-mounted</p>			

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Table 5 Old Town San Diego Community Plan Consistency Analysis				
Applicable Policies		Consistency Analysis		
		streetlights. These lights would illuminate the driveway, parking lot, sidewalk, and path.		
UD-4.16: Locate and shield exterior lights so that building exterior illumination does not light adjacent properties.		Consistent. The proposed outdoor pole-mounted streetlights would have downcast fixtures that shield light from adjacent natural areas.		
UD-4.17: Encourage the use of underground parking or partially below grade parking.		Consistent. The OTSDCP encourages incorporating underground parking into new development and, when opportunities arise, considering consolidating underground parking for multiple properties . When underground parking is not feasible, the location of parking areas relative to the buildings must ensure minimal exposure of parked vehicles to public view. Building an underground lot in this location would not be practical as this site is not in the Old Town core area, where undeveloped space is less available, and parking lots would detract from the historical character. Additionally, building an underground parking lot at the project site would require additional site grading and excavation, which could increase impacts related to air quality, biological resources, cultural resources, geological resources, GHG, hydrology and water quality, and noise.		
UD-4.18: Design and locate parking areas in relation to buildings in a manner that the exposure of parked vehicles to the public view and the street is minimized, for example at the rear of buildings, behind architectural features, or by taking advantage of the site's topography		Consistent. The proposed parking lot would be placed on a knoll to the south of the existing Junípero Serra Museum. The proposed driveway connecting the parking lot to Presidio Drive would be visible from the street, but because of its elevated topography, the parking lot itself (and the ADA-compliant path) would not be visible from Presidio Drive. From the viewpoint of the Junípero Serra Museum, the ADA-compliant path would be visible from the Junípero Serra Museum, but the parking lot would be at a higher elevation and not visible from the museum.		
UD-4.19: Use fences, walls, or plantings to screen any parking areas that could not be screened from the public view by buildings or architectural features		Consistent. The proposed parking lot is not visible from public viewing locations at the Junípero Serra Museum or Presidio Drive. It would be visible from the public access trails that surround the project site.		
UD-4.20: Design parking areas so that driveway curb cuts are minimized, locating entrance driveways from alleyways or secondary streets whenever possible		Consistent. The proposed driveway providing access to the proposed parking lot from Presidio Drive would not include any curb cuts because there are no sidewalks along Presidio Drive. Alleys and secondary streets are not present in this area, so this part of the policy is not applicable.		
UD-4.21: Design parking area screening and landscaping in a manner representative of the pre-1872 architectural style of the buildings on the site.		Consistent. The project site is within the Presidio Park area of Old Town San Diego. The proposed plantings in the landscape plan represent the native habitat of the area and would contribute to the		

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Table 5 Old Town San Diego Community Plan Consistency Analysis				
Applicable Policies		Consistency Analysis		
<p>UD-4.22: Design the interior of parking areas in a manner representative of a rural context, with dirt landscaped islands with arid landscaping and gravel-textured rural-type concrete or other soil-colored paving material. Discourage use of black asphalt and other dark colored asphalt as parking lot paving material to reduce the urban heat island effect.</p>		<p>historic character of the open space area surrounding the Junípero Serra Museum.</p> <p>Consistent. The project includes an asphalt-concrete parking lot and driveway, concrete, sandstone-colored sidewalks, and a concrete ADA-compliant path, connecting the proposed parking lot and the Junípero Serra Museum. While the concrete-asphalt driveway and parking lot would be darker in color, they would be shaded by existing mature trees and the proposed trees when they reach maturity. This would reduce the heat island effect.</p>		
<p>UD-4.23: Design parking areas for private development and retrofit visitor-serving parking lots to incorporate storm water management features that are reflective of Old Town’s pre-1872 community character, such as permeable paving, bio-retention areas or bioswales, and vegetated filter strips with native plant species as landscaping.</p>		<p>Consistent. To accommodate surface runoff, the project site includes stormwater conveyance infrastructure, as described in detail in Section X, Hydrology and Water Quality, and in the project description of this Initial Study. The infrastructure includes runoff improvements and a bioretention basin that would drain into the existing cobble gutters along Presidio Drive and Palm Canyon. Additionally, native landscaping would be used in all open space areas along the driveway, parking lot, and ADA-compliant path.</p>		
Chapter 5.6: Urban Forestry & Landscaping				
<p>UD-6.1: Incorporate landscaping that is reflective of Old Town’s character as part of yards, courtyards, plazas, and paseos for its aesthetic and environmental benefits.</p> <p>a) Design landscaping in a manner representative of a rural context, with arid landscaping and mulched with decomposed granite or natural-color wood mulch. The Old Town State Historic Park parking areas on Congress Street are excellent examples of this design style.</p> <p>b) Minimize the use of impervious surfaces and surfaces that have large thermal gain (including asphalt and gravel) to promote storm water infiltration and reduce the Urban Heat Island effect.</p>		<p>Consistent. The project includes a mix of pervious surfaces, such as natural landscaped areas, and impervious surfaces, such as the driveway, parking lot, sidewalks, and the ADA-compliant path. The landscaped areas would feature a mix of native shrubs and grasses that reflect the historic character of the area. As this project is away from the core Old Town San Diego area, the site does not have historic yards, courtyards, plazas, or paseos.</p> <p>The proposed parking lot and driveway would be an impervious asphalt-concrete mix, but as described in Section X, Hydrology and Water Quality, the drainage plans for the project site would redirect impervious surface flows from the parking lot and driveway into a proposed biofiltration basin adjacent to the base of the driveway. Runoff from the northern portion of the project site, comprising the proposed ADA-compliant path and pervious terrain between the path segments, would drain as described above under “Operational Water Quality” in Section X(a).</p> <p>While the concrete-asphalt driveway and parking lot would be darker in color, they would be shaded by existing mature trees and the proposed trees when</p>		

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Table 5 Old Town San Diego Community Plan Consistency Analysis				
Applicable Policies	Consistency Analysis			
	they reach maturity. This would reduce the heat island effect.			
UD-6.2: Prioritize the selection of drought-tolerant plant species from the Planting Palettes when planning landscaping.	Consistent. Planting Palette B in the OTSDCP includes a list of shrubs and trees that are encouraged in the planning area. Some of these plants would apply more to the core area, where the historic buildings, plazas, courtyards, etc., are located. The project site occupies an open space area in the northern portion of Presidio Park and would benefit more from native plant species that represent the natural historic character of the area. However, several of the proposed plants from the landscaping plan, such as coast live oak trees (<i>Quercus agrifolia</i>), <i>Ceanothus</i> sp., and <i>Eriogonum</i> sp., appear on Planting Palette B.			
UD-6.3: Preserve existing mature trees wherever possible, including non-native trees which, due to their size and age, are an appreciating asset that are currently providing the greatest environmental benefits to the community.	Consistent. The project would require the removal of 53 of 112 existing mature trees (see “Tree Survey Letter Report for the Junipero Serra Museum Americans with Disabilities Act (ADA) Improvements Project” (RECON Environmental, 2025)). Where feasible, existing trees are preserved to help maintain their environmental benefits. The removed trees that are suitable for monarch habitat (45 replacement trees) would be replaced on-site.			
UD-6.4: Maximize the use of landscaping to provide shade and passive cooling to buildings. a) Plant trees strategically for their benefits in building, window, and outdoor space shading. b) Plant deciduous trees on the south side of buildings to shade the south face and roof during the summer while allowing sunlight to reach buildings in the winter. c) Explore the use of vegetation to shield exposed east and west facing walls. d) Plant ground covers that prevent ground reflection of solar heat and keep the surface cooler.	Consistent. The project does not include the construction of buildings that would benefit from the shade of mature trees. However, the existing mature trees and the proposed replacement trees would provide cooling effects, reducing the heat island effect of the proposed parking lot, driveway, and ADA-compliant path. The proposed native shrubs and grasses would also provide ground cover to keep the ground surface cooler.			
UD-6.5: Incorporate decorative elements such as rock groupings, raised planters, bollards, sculptures, decorative paving, or decomposed granite as part of landscaping areas.	Consistent. The proposed landscaping does not include the incorporation of decorative elements; however, the intent of the proposed landscaping plan is to mimic the natural, native vegetation of the area. The project site is not near the core area of Old Town San Diego and does not have plazas, courtyards, paseos, etc. that typify the core area that would benefit from these decorative elements. While the project is not necessarily consistent with this policy, it would have a landscaping plan that is consistent with the surrounding natural character.			

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Table 5 Old Town San Diego Community Plan Consistency Analysis				
Applicable Policies		Consistency Analysis		
<p>UD-6.6: Utilize raised planters, planted arbors, planting in conjunction with fountains to incorporate landscaping into paved public spaces such as courtyards, plazas, or paseos.</p>	<p>Consistent. See the consistency analysis for UD-6.5.</p>			
<p>UD-6.7: Maximize the use of landscaping to screen mechanical equipment and parking areas from the street.</p>	<p>Consistent. The proposed landscaping would soften the views of the proposed parking lot, driveway, and ADA-compliant path, making them visually obtrusive. The proposed trees, shrubs, and grasses would mimic the existing natural character of the project site and surrounding area.</p>			
<p>UD-6.8: Design parkway landscaping in a manner representative of a rural context, with arid landscaping, plant species selected from Table 5-1, and decomposed granite or natural-color wood mulch. The Old Town State Historical Park parking areas on Congress Street are excellent examples of this design style.</p>	<p>Consistent. Table 5-1 of the OTSDCP is a list of herbaceous plant species that are encouraged in the planning area. The plants in the proposed landscaping plan include shrubs and trees, as shown in Table 5-2 (Planting Palette B) of the OTCP. Some of these plants would apply more to the core area, where the historic buildings, plazas, courtyards, etc., are located. The project site is within an open space area in the northern portion of Presidio Park and would benefit more from native plant species that represent the natural historic character of the area. However, several of the proposed plants from the landscaping plan, such as coast live oak trees (<i>Quercus agrifolia</i>), <i>Ceanothus</i> sp., and <i>Eriogonum</i> sp., appear on Planting Palette B.</p>			
<p>UD-6.13: Ensure that a tree maintenance and watering plan is in place for all new development and redevelopment projects to maintain the long-term health of street trees. A tree maintenance plan should include the following activities:</p> <ul style="list-style-type: none"> a) Tree trimming only as needed to eliminate public safety hazards, provide visibility of traffic signals and other traffic control devices for pedestrians and motorists, and train the tree's shape and growth. b) Immediate removal of dead trees or trees deemed to be an immediate hazard in the public right-of-way. c) Street tree watering that is based on how large the tree is, to ensure maximum use of water provided. d) Removal of weeds and trash from street tree pits to reduce the amount of stress placed on the plants. e) Loosening of the top 2-3 inches of soil by a tree care professional to alleviate compaction and help water and air reach the roots and application of a three-inch layer of mulch to the tree pit to facilitate growth. 	<p>Consistent. The project would include the planting of 45 new trees to replace 45 monarch-supporting trees that would be removed from the project site. While these 38 coast live oak trees and 7 Torrey pine trees are not street trees as described in this policy, they would be maintained by the City's Parks and Recreation Department to support their long-term health.</p>			

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Table 5 Old Town San Diego Community Plan Consistency Analysis				
Applicable Policies		Consistency Analysis		
Chapter 7.6 Health and Safety				
PF-6.2: Protect public health and safety through the application of effective seismic, geologic, and structural considerations.	Consistent. A geotechnical investigation for the project found no known active earthquake faults underlying the project site. The nearest fault is the Rose Canyon fault, which is approximately 800 feet southwest of the project site. Section VII describes how the project would be consistent with the local and state building requirements that would reduce geological impacts. All potential geological and seismic risks are determined to be less than significant.			
PF-6.3: Require the submission of geologic and seismic reports, as well as soils engineering reports, in relation to applications for land development permits whenever seismic or geologic problems are suspected.	Consistent. The geotechnical investigation would be submitted with the project development application.			
Chapter 9.1: Sustainable Development				
CE-1.2: Implement mobility measures that reduce dependence on single-occupant vehicle use, increase fuel efficiency and promote the use of alternative, more sustainable energy sources	Consistent. The project is a parking lot for single-occupant vehicles. However, the necessity of providing ADA-compliant access to the Junípero Serra Museum is a priority for the City, ensuring fair and accessible use of public space for all visitors.			
CE-1.3: Provide electric vehicle charging stations, including fast-charging stations, in parking garages, near parks and public facilities, and in office, hotel, mixed-use, and residential developments.	Consistent. The City's Sustainability and Mobility Department determined that the parking lot would not be required to provide electric vehicle charging stations due to the unique design challenges of the project site. The project qualifies for a policy exemption.			
CE-1.8: Improve energy and water conservation in the operation and design of existing and new public facilities and public landscaping areas.	Consistent. The landscape plan indicates that the project site would be landscaped with drought-tolerant, native plants to mimic the natural setting and to reduce water use. Other water-consuming uses would not be a part of the project.			
CE-1.13: Increase the community's overall tree canopy within the public right-of-way and development sites to provide air quality benefits and urban runoff management.	Consistent. The project would require removing 53 trees. Of these, 45 would be suitable habitat for monarch butterflies; these 45 would be replaced on-site with a mix of 38 coast live oak trees and 7 Torrey pines. These trees are being replanted to provide environmental and aesthetic benefits, such as providing habitat, shade, erosion control, pollutant filtration, carbon sequestration, and visual appeal that maintains the natural character of the project site. To the extent possible, mature trees would be retained on-site, while those that would be removed would be replaced.			
CE-1.14: Design and construct development to retain significant, mature and healthy trees located within required landscape setbacks, and within other portions of the site as feasible (also refer to Urban	Consistent. See the consistency analysis for policy CE-1.14.			

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Table 5 Old Town San Diego Community Plan Consistency Analysis				
Applicable Policies		Consistency Analysis		
Design Element, Urban Forestry & Landscaping section).				
CE-1.16: Plant or replace street trees to fill existing gaps and provide continuous, regularly spaced tree canopies.	Consistent. See the consistency analysis for policy CE-1.14.			
Chapter 9.2 Natural Resource Conservation				
CE-2.1: Implement applicable requirements of the Environmentally Sensitive Lands regulations, Biology Guidelines, MSCP Subarea Plan and State or Federal Endangered Species Acts for preservation, mitigation, acquisition, restoration, and management and monitoring of biological resources, as applicable.	Consistent. Because the project would occur within and adjacent to the MHPA, it would be required to comply with the MHPA Land Use Adjacency Guidelines. Section IV, Biological Resources, of this Initial Study, summarizes the adjacency guidelines. Prior to issuance of any construction permit or notice to proceed, Developmental Services Department/Land Development Review Division, and/or MSCP staff shall verify that the Applicant has accurately represented the project's design in or on the Construction Documents in conformance with the associated discretionary permit conditions and Exhibit "A" and also the City's MSCP MHPA Land Use Adjacency Guidelines. The applicant shall provide an implementing plan and include references in the Construction Documents for the following, which are discussed in Section IV: drainage, toxics, lighting, noise, barriers, invasives, brush management, and grading/land development.			
CE-2.2: Minimize grading of steep hillsides and other significant natural features within the community.	Consistent. The project site is on a sloped knoll, and grading would be required to accommodate the proposed driveway, parking lot, and path. In total, 1.42 acres would be graded with a maximum cut quantity of 4,000 cy and a maximum fill quantity of 370 cy. A maximum export quantity would be 3,630 cy. The existing topography of the project would be maintained to the extent feasible; the majority of the grading would be concentrated on the northern side of the site, where the parking lot would cut into the hillside, and the proposed path would cut a switch-backed pattern from the higher elevation of the parking lot to the lower elevation of the Junípero Serra Museum.			
CE-2.3: Re-vegetate areas of invasive vegetation with native vegetation to restore biological diversity and minimize erosion and soil instability.	Consistent. In general, the project would protect views and/or vistas of and from the project site because it would not include the construction of buildings or structures that could obscure these views. The project would not impact canyons (e.g., Palm Canyon to the west of the project site); it does involve construction in a rural area, and it does not affect the existing trails in the vicinity of the project site.			

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Table 5 Old Town San Diego Community Plan Consistency Analysis				
Applicable Policies		Consistency Analysis		
				The project would include planting native species; which would prevent the spread of nonnative plant species into nearby open space preserves.
CE-2.4: Repair and retrofit storm drain discharge systems to prevent erosion and improve water quality by adequately controlling flow and providing filtration. Storm drain outfalls should limit the use of concrete in favor of more natural, vegetated designs.				Consistent. As described in Section X, Hydrology and Water Quality, a drainage study, a SWQMP, and a SWPPP have been prepared for the project. The BMP and drainage plans identified in the SWQMP would be included as part of project construction, and they include a biofiltration basin. The basin would have a maximum capacity of 2,309 cubic feet (within a 962-square-foot area) and have an 8-inch polyvinyl chloride (PVC) underdrain inside an 18-inch perforated PVC storm drain. The basin would treat and regulate surface runoff before it enters the existing cobble gutter along Presidio Drive. Runoff from the remainder of the site would sheet-flow into the existing cobble gutter along Presidio Drive.
CE-2.6: Restore or enhance natural biological values where trails and storm drain systems abut or cross canyons landforms or steep hillsides to aid wildlife movement by providing vegetative cover and controlling and directing access to designated trails.				Consistent: The project site covers a natural open space area. It does not include a canyon, but it is adjacent to Palm Canyon. The proposed parking lot, driveway, and ADA-compliant path would not cause a substantial barrier for wildlife movement. The proposed landscaping would also restore native plants in the area, supporting the adjacent MHPA lands.
Chapter 9.3: Urban Runoff Management				
CE-3.1: Incorporate Low Impact Development practices into building design and site plans that work with the natural hydrology of a site to reduce urban runoff, including the design or retrofit of existing landscaped or impervious areas to better capture storm water runoff.				Consistent. As described in Section X, a drainage study, a SWQMP, and a SWPPP have been prepared for the project. The BMP and drainage plans identified in the SWQMP would be included as part of project construction. They include a biofiltration basin and stormwater improvements. The biofiltration basin would have a maximum capacity of 2,309 cubic feet (within a 962-square-foot area). Under the basin would be an 8-inch PVC underdrain inside an 18-inch PVC storm drain, which would connect to the existing cobble gutter along Presidio Drive. Runoff from the northern portion of the project site, comprising the proposed ADA-compliant path and pervious terrain between the path segments, would drain as described above under "Operational Water Quality" in Section X(a). The stormwater conveyance system has been designed to mimic the existing drainage pattern on the project site.
CE-3.3: Prioritize Low Impact Development practices that encourage water infiltration to minimize				Consistent. As described in the drainage study, surface flows tend to sheet-flow off the site into one of two cobble gutters: one to the west along Presidio

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Table 5 Old Town San Diego Community Plan Consistency Analysis				
Applicable Policies	Consistency Analysis			
reliance on storm drains that could be impaired by sea level rise.	Drive and the other to the east in Palm Canyon. Groundwater is expected to be more than 20 feet below the ground surface. The project would include a stormwater conveyance system that directs surface runoff into the existing stormwater system, as described in more detail in Section X of this Initial Study.			

The project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project, including but not limited to the OTSDCP, MSCP, SDMC, or zoning code, adopted for the purpose of avoiding or mitigating an environmental effect. Impacts would be less than significant.

XII. MINERAL RESOURCES – Would the project:

- a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

Mineral Resource Zones (MRZ) are determined by the California Geological Survey, a division of the California Department of Conservation. The project site is in an area designated MRZ-3, an area containing mineral deposits for which the significance cannot be evaluated from available data. The project site is developed as a public park and museum and is not used for aggregate mining, nor would the project preclude or substantially interfere with the development of a mineral resource extraction project. Mineral resource extraction would not be compatible with the existing land uses. Therefore, project implementation would not cause a significant loss of mineral resource availability. Impacts would be less than significant.

- b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

See XII(a). Impacts would be less than significant.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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XIII. NOISE – Would the project result in:

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| a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
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Project construction noise would be generated by diesel engine-driven construction equipment used for debris and vegetation removal and hauling. Construction noise could result in short-term impacts to surrounding properties.

In the City of San Diego, construction noise is regulated by the City's Noise Abatement and Control Ordinance (San Diego Municipal Code Section 59.5.0404).

- A. It shall be unlawful for any person, between the hours of 7:00 p.m. of any day and 7:00 a.m. of the following day, or on legal holidays as specified in Section 21.04 of the San Diego Municipal Code, with exception of Columbus Day and Washington's Birthday, or on Sundays, to erect, construct, demolish, excavate for, alter or repair any building or structure in such a manner as to create disturbing, excessive or offensive noise unless a permit has been applied for and granted beforehand by the Noise Abatement and Control Administrator.
- B. . . . it shall be unlawful for any person, including the City of San Diego, to conduct any construction activity so as to cause, at or beyond the property lines of any property zoned residential, an average sound level greater than 75 decibels during the 12-hour period from 7:00 a.m. to 7:00 p.m.

Project grading and construction noise would be generated by diesel-engine-driven construction equipment used for site preparation and grading, concrete work, loading, unloading, and placing materials and paving. Diesel-engine-driven trucks also would bring materials to the site and remove the soil from excavation. Construction equipment with a diesel engine typically generates maximum noise levels from 70 to 95 dB(A) L_{eq} at a distance of 50 feet (Federal Highway Administration [FHWA] 2006). Table 6 summarizes typical construction equipment noise levels.

Equipment	Maximum Noise Level at 50 Feet [dB(A) L_{eq}]	Typical Duty Cycle	Average Hourly Noise Level at 50 Feet [dB(A) L_{eq}]
Auger Drill Rig	84	20%	77
Backhoe	80	40%	76
Blasting	94	1%	74
Chain Saw	85	20%	78
Clam Shovel	93	20%	76
Compactor (ground)	80	20%	73
Compressor (air)	80	40%	76
Concrete Mixer Truck	85	40%	81
Concrete Pump	82	20%	75

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Table 6 Typical Construction Equipment Noise Levels				
Equipment	Maximum Noise Level at 50 Feet [dB(A) L_{eq}]	Typical Duty Cycle	Average Hourly Noise Level at 50 Feet [dB(A) L_{eq}]	
Concrete Saw	90	20%	83	
Crane (mobile or stationary)	81	16%	73	
Dozer	85	40%	81	
Dump Truck	84	40%	80	
Excavator	85	40%	81	
Front End Loader	80	40%	76	
Generator (25 kilovolt amps or less)	70	50%	67	
Generator (more than 25 kilovolt amps)	82	50%	79	
Grader	85	40%	81	
Hydra Break Ram	90	10%	80	
Impact Pile Driver (diesel or drop)	95	20%	88	
Insitu Soil Sampling Rig	84	20%	77	
Jackhammer	85	20%	78	
Mounted Impact Hammer (hoe ram)	90	20%	83	
Paver	85	50%	82	
Pneumatic Tools	85	50%	82	
Pumps	77	50%	74	
Rock Drill	85	20%	78	
Roller	74	40%	70	
Scraper	85	40%	81	
Tractor	84	40%	80	
Vacuum Excavator (vac-truck)	85	40%	81	
Vibratory Concrete Mixer	80	20%	73	
Vibratory Pile Driver	95	20%	88	
SOURCE: FHWA 2006.				

Noise levels were calculated assuming the simultaneous use of three heavy pieces of equipment: a dump truck, an excavator, and a loader. Together, this equipment generates an average hourly noise level of 84.3 dB(A) L_{eq} at 50 feet. As discussed in Section III(c), the nearest residential uses are located 515 feet to the southeast and 870 feet to the east. A noise level of 84.3 dB(A) L_{eq} at 50 feet would attenuate to 64.0 dB(A) L_{eq} at 515 feet. Thus, noise levels would not exceed 75 dB(A) L_{eq} at the nearest residential property line. Although the adjacent receivers would be exposed to construction noise levels that could be heard above ambient conditions, the exposure would be temporary and regulated by the City's Noise Abatement and Control Ordinance.

In addition, the project would be required to adhere to Whitebook standards, which require a Community Health and Safety Plan (CHSP) to list the name and 24-hour telephone number of the Site Safety Manager and the person(s) to contact regarding problems such as noise.

Sensitive receptors (e.g., Cooper's hawk and western bluebird) occur in the immediate area and may be temporarily affected by construction noise; however, construction activities would be required to comply with the Whitebook (Section 300-Earthwork and 802-2, Biological Resources Protection During Construction), which are intended to reduce potential adverse effects resulting from

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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construction noise. Mitigation measure MM-BIO-1 would reduce potential impacts to less than significant.

The only operational sources of noise associated with the project would be associated with maintenance, such as landscape maintenance equipment. These noise sources would be similar to the existing noise environment surrounding the museum and are not expected to exceed the property line noise level limits. The project would not include any stationary mechanical equipment or any other permanent noise sources. Therefore, operational noise impacts would be less than significant.

Construction-related noise would temporarily result in an increase in ambient noise levels in the project area, but would no longer occur once construction is completed. Long-term noise would not differ substantially from existing conditions in the vicinity. Construction and operational noise would be less than significant.

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| b) Generation of, excessive groundborne vibration or groundborne noise levels? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
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The project would not result in the construction of any features that would generate vibration during operation. During project construction, standard trenching equipment would be used that would not generate significant vibration. Construction methods that would generate significant vibration, such as blasting or pile driving, are not proposed.

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| c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
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The project site is located within the vicinity of the Airport Land Use Compatibility Plans for San Diego International Airport and North Island Air Station, located outside the 60 dB(A) L_{eq} community noise equivalent level (CNEL) noise contours. Additionally, the project does not include the construction of a new sensitive noise receptor. The construction of ADA improvements would not expose people residing or working in the project area to excessive noise levels, and impacts would be less than significant.

XIV. POPULATION AND HOUSING – Would the project:

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| a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

The project would not induce substantial unplanned population growth because it would not include the construction of new housing and/or businesses. The project includes the construction of a new

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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parking lot and driveway that would serve the existing Junípero Serra Museum. The project would not extend infrastructure into undeveloped areas. Impacts would be less than significant.

b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The project would not construct any housing or other habitable structures. The site is mostly undeveloped with some trails and natural vegetation. The project would include the construction of a parking lot, a driveway, and an ADA-accessible path between the lot and the existing Junípero Serra Museum. These developments would not cause the displacement of people or housing, and they would not cause the construction of new housing elsewhere. No impacts would occur.

XV. PUBLIC SERVICES -

a) Would the project result in substantial adverse physical impacts associated with the provisions of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service rations, response times or other performance objectives for any of the public services:				
i) Fire protection;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Police protection;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Schools;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Parks;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
v) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The project would include the construction of a new parking lot, driveway, and ADA-compliant path between the proposed parking lot and the existing Junípero Serra Museum. These developments would meet the museum's goal to provide its patrons with more equitable access to the property. The provision of nine parking spaces (four standard and five ADA-compliant) would meet an existing demand but would not significantly increase the museum's attendance and, thus, would not cause a significant need for fire protection, police protection, schools, parks, and/or other services. Impacts related to fire protection, police protection, schools, parks, and/or other services would be less than significant.

XVI. RECREATION -

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The proposed parking lot, driveway, and ADA-compliant path would meet the Junípero Serra Museum's goal of providing more easily accessible, equitable access to the property for all of its patrons. Providing nine parking spaces (four standard and five ADA-compliant) would meet the existing demand for ADA-compliant accessibility. The project would incorporate improvements to recreational facilities; however, it would not significantly increase the use of the facility and would not cause substantial physical deterioration of the facility. Impacts would be less than significant.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The project would include the development of a 9-space parking lot, a driveway, and an ADA-compliant path that connects the parking lot to the Junípero Serra Museum. It provides ADA-compliant access to the existing museum to meet an existing demand, but would not generate a need to expand the existing facilities. No impacts related to the expansion of recreational facilities would occur. Impacts would be less than significant.

XVII. TRANSPORTATION –

a) Would the project or plan/policy conflict with an adopted program, plan, ordinance or policy addressing the transportation system, including transit, roadways, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The project would include construction of a 9-space parking lot, a driveway, and an ADA-compliant path connecting the parking lot to the Junípero Serra Museum. All modifications would occur outside the existing vehicular or bicycle street network.

The project does not substantially conflict with any adopted plans or policies related to the mobility section of the OTCP. It is consistent with policies ME-1.1, which calls for improved pedestrian access between the Old Town Transit Center and park sites, and ME-1.2, which calls for the use and repair of curb paths throughout the OTCP area. Additionally, the project would not conflict with the City's CAP [see Section VII(a)]. The temporary use of construction vehicles within and outside the City would be limited to small individual footprints that would not significantly impact circulation, which could result in a conflict with any adopted program or plan addressing the transportation system, and a Traffic Control Plan would be implemented during construction. Therefore, impacts related to an adopted transportation plan, policy, or program would be less than significant.

b) Would the project or plan/policy result in VMT exceeding thresholds identified in the City of San Diego Transportation Study Manual?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The City's Transportation Study Manual (City of San Diego 2022) has screening criteria that are used to determine whether a project would need to conduct a VMT analysis (City of San Diego 2022). Small projects with fewer than 300 average daily trips do not require a VMT analysis.

The proposed parking lot, driveway, and ADA-compliant path would increase the Junípero Serra Museum's parking capacity by approximately 20 percent (9 additional parking spaces, bringing the total to 44). Per the Traffic Evaluation Report (see "Traffic Evaluation Report for Junipero Serra Museum ADA Improvement Project" (Nasland Engineering, 2019)), the project would include the installation of a driveway, a parking lot, and an ADA-compliant path, and not any new trip-generating

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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facilities. Therefore, the project would not result in an increase of more than 300 average daily trips (City of San Diego 2022). As such, impacts related to VMT would be below the City's screening criteria, and impacts would be less than significant.

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| c) Would the project or plan/policy substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
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The project is the development of a parking lot, driveway, and ADA-compliant path, to be built off the main street network. The driveway would be built to match the existing grade of Presidio Drive, and it would not create a dangerous intersection. There are no sharp curves or blind corners that would cause blocked views. It would also not introduce incompatible uses on the street network. Impacts would be less than significant.

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| d) Result in inadequate emergency access? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
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See IX. (f). Impacts would be less than significant.

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

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| a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|-------------------------------------|--------------------------|--------------------------|

In accordance with the requirements of AB 52, the City sent notification to Native American tribes traditionally and culturally affiliated with the project area. There were no requests for additional comments or consultation on the project. Due to the potential for cultural resources to be uncovered during grading activities, impacts to tribal cultural resources would be potentially significant. The City's requirement to include archaeological and Native American monitors as a mitigation measure is included in Section (V)(b). As detailed in mitigation measure MM-CUL-1, the presence of a qualified archaeologist and a Native American monitor during earth-moving activities would reduce impacts related to tribal cultural resources to less than significant.

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| b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code section 5024.1, the lead agency shall consider the | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
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Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
significance of the resource to a California Native American tribe.				

See response XVIII(a). While the AB 52 notification process did not identify a tribal cultural resource, there is a recorded archaeological site at the project location. Implementation of mitigation measure MM-CUL-1 would require Native American monitoring; therefore, potential impacts would be reduced to below a level of significance.

XIX. UTILITIES AND SERVICE SYSTEMS – Would the project:

- a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which would cause significant environmental effects?

The project would not generate a need for wastewater treatment, significant electricity, natural gas, or telecommunications use. Sufficient water supplies are available for project-required revegetation maintenance. As described in Section X(a), the project would include construction of a new stormwater drainage system to convey stormwater from the project site to the existing cobble gutters along Presidio Drive and in Palm Canyon. A proposed biofiltration basin at the base of the proposed driveway would accommodate stormwater and dry-season runoff from the proposed driveway and parking lot. Stormwater and dry season runoff from the concrete ADA-compliant path would flow northward into a self-dispersion area. This basin has been designed to accommodate 100-year-flood flows, and overall, the drainage system is designed to mimic the existing on-site stormwater flows. It is not expected to cause a significant increase in stormwater flows, and no new facilities would required to accommodate the project site. Impacts would be less than significant.

- b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

The project is the construction and operation of a parking lot, a driveway, and an ADA-compliant path. It would not have any operational water usage that would affect existing water supplies. Sufficient water supplies are available for project-required revegetation and landscape maintenance. Therefore, impacts would be less than significant.

- c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's demand in addition to the provider's existing commitments?

The project is the construction and operation of a parking lot, a driveway, and an ADA-compliant path and would not construct any residential, commercial, or other uses that would require

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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expanded wastewater treatment capacity. Therefore, the project would not exceed existing wastewater treatment capacity.

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| d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
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The project is the construction and operation of a parking lot, a driveway, and an ADA-compliant path. During operation, the project would not generate solid waste. During construction, the project would generate solid waste requiring disposal at local landfills. In addition to standard construction waste materials, site grading would require the removal of 3,800 cy of soil. As the project site is not identified as a hazardous waste site (see Section IX), this soil may be used off-site. The project's construction would not involve the demolition of existing structures.

Public projects are required to adhere to City of San Diego Administrative Regulations and project specifications that require reducing overall waste to comply with waste reduction targets established in the Public Resources Code. The project would be required to comply with the City's Collection, Transportation, and Disposal of Refuse and Solid Waste ordinance (Sections 66.0601 through 66.0610 of the SDMC). This ordinance helps the City meet the goals of Assembly Bill 939, which require municipalities to divert 50 percent of waste from going to landfills. As required by the Whitebook, a Waste Management Form for the project's construction must be submitted at the Pre-Construction meeting, showing a weight-based "good faith" estimate of each type of construction waste that would be generated and specifying how construction waste shall be recycled. The project would not generate solid waste in excess of state or local standards or capacity. Therefore, the project would result in less than significant impacts related to solid waste are less than significant.

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| e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
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As stated in Section XIX(d), the project would be required to comply with local solid waste regulations (SDMC Sections 66.0601 through 66.0610). These regulations aim to divert construction solid waste from going to the local municipal landfill, Miramar Landfill, in compliance with Assembly Bill 939. Overall, impacts from solid waste regulations would be less than significant.

XX. WILDFIRE – If located in or near state responsibility area or lands classified as very high fire hazard severity zones, would the project:

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| a) Substantially impair an adopted emergency response plan or emergency evacuation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
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Presidio Park, including the project site, is within a Very High Fire Hazard Severity Zone as identified by the City's General Plan Update (Blueprint SD). Since the project does not include the construction of any habitable structures, it does not directly bring additional people to the project site. It would provide an opportunity for increased visitation to the Junípero Serra Museum, but the increase would not be substantial, and it would not affect the implementation of the museum's emergency plans. The construction of the parking lot, driveway, and ADA-compliant path would also be built

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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outside the existing roadway network. It would not prevent the implementation of any community-wide emergency response or evacuation plans. Impacts would be less than significant.

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| <p>b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire?</p> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

The project site is a sloped, vegetated surface in a Very High Fire Hazard Severity Zone; however, it does not include any habitable structures that would bring occupants to the project site. Construction of the proposed driveway, parking lot, and ADA-compliant path would not exacerbate the risk of wildfire. Overall, impacts related to wildfire pollutants and/or the spread of wildfires would be less than significant.

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| <p>c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?</p> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

The project would not require the installation or maintenance of associated infrastructure. No impacts would occur.

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| <p>d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?</p> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

As described in Section X(a), project construction includes a stormwater conveyance system to accommodate the runoff flows of the parking lot, driveway, and ADA-compliant path. This system has been designed with 100-year-flood parameters to prevent off-site flooding and/or overflowing the existing stormwater system. If a wildfire were to occur in the surrounding vegetated areas and structures, the proposed parking lot, driveway, and path would help deter the fire from spreading and would reduce the potential for slope instability compared to the existing conditions. Impacts related to wildfire-imposed flooding or slope instability would be less than significant.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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XXI. MANDATORY FINDINGS OF SIGNIFICANCE –

<p>a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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As described in Section IV, all impacts on biological resources would be mitigated to a level less than significant. As described in Section V, all impacts on historical resources would be mitigated to a level less than significant. Therefore, the project would not have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory. As such, mitigation measures have been incorporated to reduce impacts to less than significant as outlined within the Initial Study.

<p>b) Does the project have impacts that are individually limited but cumulatively considerable (“cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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As described in the MND, all impacts would be mitigated to a level less than significant.

Air quality is a regional issue, and the cumulative study area for air quality impacts encompasses the San Diego Air Basin as a whole. Therefore, the cumulative analysis addresses regional air quality plans and policies, such as the RAQS, as well as the project’s contribution to a net increase of any criteria pollutant for which the San Diego Air Basin is listed as a non-attainment area. As described in Section III. a), the project would not construct any residential, commercial, or other uses. Consequently, the project would not result in growth that is not anticipated in SANDAG or County growth projections and would not generate any operational emissions. As described in Section III. b), the project would not result in construction emissions in excess of the applicable significance thresholds for all criteria pollutants. Consequently, the project would not result in additional emissions that are not already accounted for in the RAQS.

As described in Section V. a), mitigation would reduce potential cumulative impacts related to archaeological resources to a level less than significant.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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As described in Section VII, the project would be consistent with the City's CAP. Therefore, the project's contribution of GHGs to cumulative statewide emissions would be less than cumulatively considerable. All other project impacts were determined to be less than significant, and due to the limited scope of the project, would result in less than significant cumulatively considerable impacts with mitigation incorporated.

- | | | | | |
|--|--------------------------|-------------------------------------|--------------------------|--------------------------|
| c) Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|-------------------------------------|--------------------------|--------------------------|

As discussed in Section III, Air Quality, the project would have less than significant impacts in relation to air quality health concerns, given the distance between the project site and sensitive receptors. Potentially significant impacts to cultural and tribal cultural resources would be mitigated to below a level of significance. The project would not generate substantial noise during construction or operation that would have adverse effects on human beings. As discussed in IX Hazards and Hazardous Materials, with incorporation of bid requirements and Whitebook requirements for the CHSP, the project would not create conditions that would significantly, directly or indirectly impact human beings. Other issue areas that could potentially create substantial adverse effects on human beings, such as the risk of fire or flooding, were determined to be less than significant. Thus, no substantial adverse effects on human beings, either directly or indirectly, would occur because of project implementation, and impacts would be less than significant with mitigation incorporated.

**INITIAL STUDY CHECKLIST
REFERENCES**

I. Aesthetics

- Caltrans, California State Scenic Highways
- City of San Diego General Plan
- Community Plans: Old Town San Diego Community Plan

II. Agricultural Resources and Forest Resources

- City of San Diego General Plan
- U.S. Department of Agriculture, Soil Survey - San Diego Area, California, Part I and II, 1973
- California Agricultural Land Evaluation and Site Assessment Model (1997)
- California Department of Conservation, California Farmland Mapping and Monitoring Program
- Site Specific Report:

III. Air Quality

- California Clean Air Act Guidelines (Indirect Source Control Programs) 1990
- California Emissions Estimator Model (CalEEMod) Version 2022.1, California Air Pollution Control Officers Association, April 2022.
- Office of Environmental Health Hazard Assessment, Air Toxics Hot Spots Program Guidance Manual for the Preparation of Risk Assessments (Guidance Manual), February 2015.
- Transportation Forecast Information Center: ABM2+/2021RP Year 2025 data, SANDAG, 2024. Accessed September 27, 2024.
- Regional Air Quality Strategies (RAQS) - APCD
- Site Specific Report:

IV. Biological Resources

- City of San Diego, Multiple Species Conservation Program (MSCP), Subarea Plan, 1997
- City of San Diego, MSCP, "Vegetation Communities with Sensitive Species and Vernal Pools" Maps, 1996
- City of San Diego, MSCP, "Multiple Habitat Planning Area" maps, 1997
- Old Town San Diego Community Plan: Conservation Element
- California Department of Fish and Game, California Natural Diversity Database, "State and Federally-listed Endangered, Threatened, and Rare Plants of California," January 2024
- California Department of Fish and Game, California Natural Diversity Database, "State and Federally-listed Endangered and Threatened Animals of California," January 2024
- California Department of Fish and Game, Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species, 2023
- City of San Diego Land Development Code Biology Guidelines 2018
- Site Specific Report:
 - Biological Letter Report for the Junípero Serra Museum ADA Improvements Project, San Diego, California, prepared by RECON Environmental, Inc., October 2024
 - Tree Survey Letter Report for the Junípero Serra Museum ADA Improvements Project, San Diego, California, prepared by RECON Environmental, Inc., February 2025

V. Cultural Resources (includes Historical Resources and Built Environment)

- City of San Diego Historical Resources Guidelines
- City of San Diego Archaeology Library
- Historical Resources Board List
- Community Historical Survey:
- Site Specific Report:
Historical Resources Survey for the Junípero Serra Museum ADA Improvements Project, RECON Environmental, Inc., September 10, 2025

Historical Resources Technical Report for Junípero Serra Museum ADA Improvements, Heritage Architecture and Planning, November 2020

VI. Geology and Soils

- City of San Diego Seismic Safety Study
- U.S. Department of Agriculture Soil Survey - San Diego Area, California, Part I and II, December 1973 and Part III, 1975
- City of San Diego Paleontological Guidelines
- Deméré, Thomas A., and Stephen L. Walsh, "Paleontological Resources City of San Diego," Department of Paleontology San Diego Natural History Museum, 1996
- Kennedy, Michael P., and Gary L. Peterson, "Geology of the San Diego Metropolitan Area, California. Del Mar, La Jolla, Point Loma, La Mesa, Poway, and SW 1/4 Escondido 7 1/2 Minute Quadrangles," *California Division of Mines and Geology Bulletin* 200, Sacramento, 1975
- Kennedy, Michael P., and Siang S. Tan, "Geology of National City, Imperial Beach and Otay Mesa Quadrangles, Southern San Diego Metropolitan Area, California," Map Sheet 29, 1977
- Site Specific Report:
Geotechnical Investigation: Junípero Serra Museum ADA Improvements, prepared by SCST, LLC, March 27, 2019

VIII. Greenhouse Gas Emissions

- City of San Diego, Climate Action Plan, Adopted August 2, 2022.
- Site Specific Report: "Climate Action Plan (CAP) Memo for Junípero Serra Museum ADA Improvement Project (Project) (WBS # S-15034)," prepared by City of San Diego January 9, 2025

IX. Hazards and Hazardous Materials

- San Diego County Hazardous Materials Environmental Assessment Listing
- San Diego County Hazardous Materials Management Division
- FAA Determination
- State Assessment and Mitigation, Unauthorized Release Listing, Public Use Authorized
- CA Department of Toxic Substances Control Envirostor Accessed June 6, 2024
- State Water Resources Control Board GeoTracker Accessed June 6, 2024
- Airport Land Use Compatibility Plan - San Diego International Airport (2014) and Naval Air Station North Island (2020)
- Site Specific Report:

X. Hydrology/Drainage

- Flood Insurance Rate Map (FIRM)
- Federal Emergency Management Agency (FEMA), National Flood Insurance Program-Flood Boundary and Floodway Map
- California Tsunami Maps, California Department of Conservation, 2022, <https://www.conservation.ca.gov/cgs/tsunami/maps>
- Clean Water Act Section 303(b) list, http://www.swrcb.ca.gov/tmdl/303d_lists.html
- Site Specific Report:
 - Drainage Study for Junípero Serra Museum ADA Improvements, prepared by Nasland Engineering, June 2024
 - Stormwater Quality Management Plan for the Junípero Serra Museum ADA Improvement Project, prepared by Nasland Engineering, January 2025

XI. Land Use and Planning

- City of San Diego General Plan
- Community Plan: Old Town San Diego Community Plan
- Airport Land Use Compatibility Plans (see Noise)
- City of San Diego Zoning Maps
- FAA Determination:
- Other Plans:

XII. Mineral Resources

- California Department of Conservation - Division of Mines and Geology, Mineral Land Classification
- Division of Mines and Geology, Special Report 153 - Significant Resources Maps
- City of San Diego General Plan: Conservation Element
- Site Specific Report:

XIII. Noise

- City of San Diego General Plan
- Community Plan
- San Diego International Airport (SDIA) Airport Land Use Compatibility Plan CNEL Maps
- Naval Air Station North Island Airport Land Use Compatibility Plan CNEL Maps
- San Diego Association of Governments - San Diego Regional Average Weekday Traffic Volumes
- San Diego Metropolitan Area Average Weekday Traffic Volume Maps, SANDAG
- Technical Noise Supplement, California Department of Transportation (Caltrans), November 2013a
- Transportation and Construction Vibration Guidance Manual, Caltrans, September 2013b
- Roadway Construction Noise Model User's Guide, Federal Highway Administration (FHWA), FHWA-HEP-05-054, SOT-VNTSC-FHWA-05-01, Final Report, January 2006
- Transit Noise and Vibration Impact Assessment Manual. FTA Report No. 0123. Prepared by John A. Volpe National Transportation Systems Center. September 2018
- Site Specific Report:

XIV. Population and Housing

- City of San Diego General Plan
- Community Plan
- Series 14 Population Forecasts, SANDAG
- Other:

XV. Public Services

- City of San Diego General Plan
- Community Plan

XVI. Recreation

- City of San Diego General Plan
- Community Plan
- Department of Park and Recreation
- City of San Diego - San Diego Regional Bicycling Map
- Additional Resources:

XVII. Transportation

- City of San Diego General Plan (Blueprint San Diego)
- Community Plan: Old Town San Diego Community Plan
- San Diego Metropolitan Area Average Weekday Traffic Volume Maps, SANDAG
- San Diego Region Weekday Traffic Volumes, SANDAG
- Site Specific Report: Traffic Evaluation Report for the Junípero Serra Museum ADA Improvement Project, Nasland Engineering, March 12, 2019
- City of San Diego Transportation Study Manual (2022)

XVIII. Tribal Cultural Resources

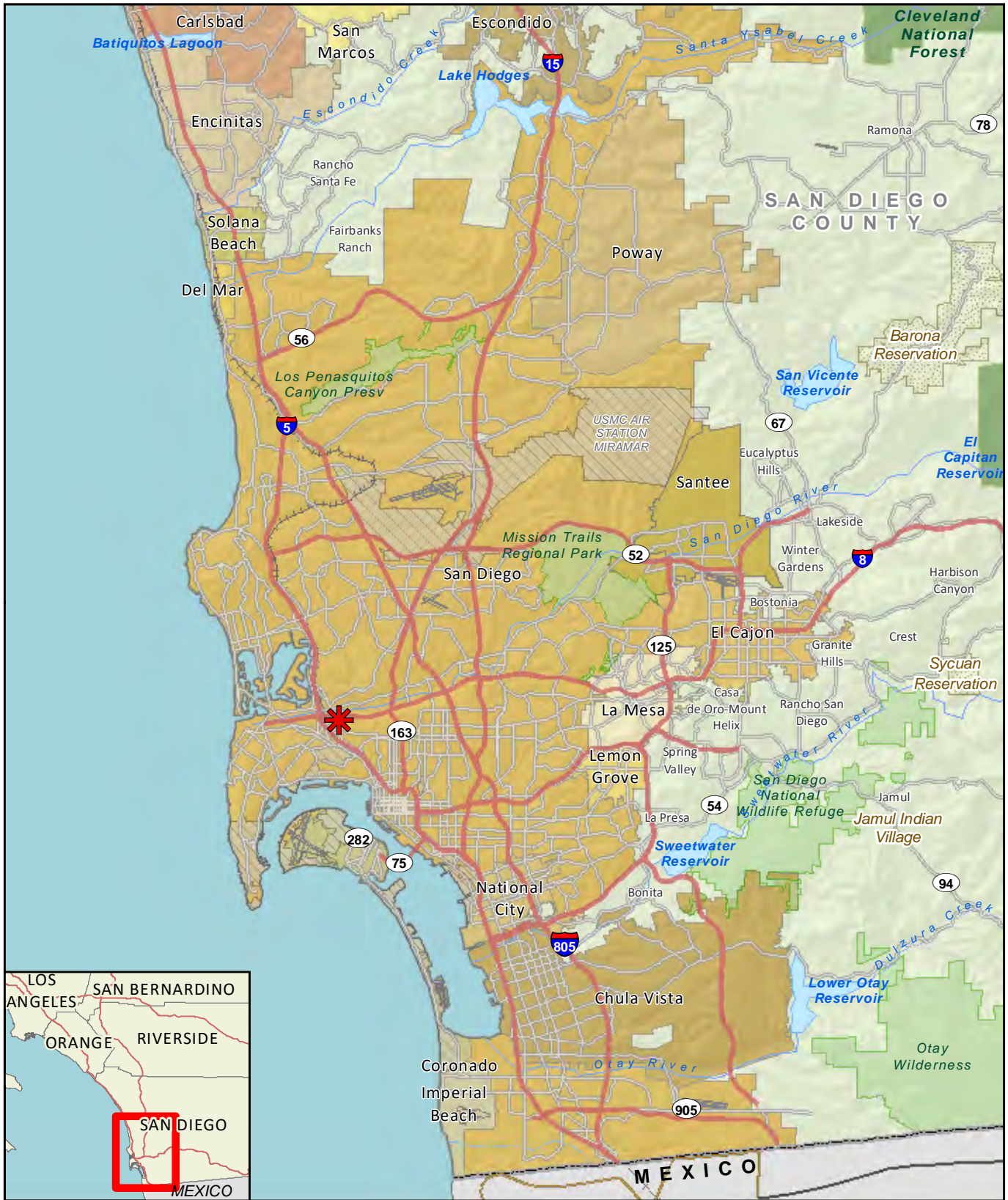
- City of San Diego Historical Resources Guidelines
- City of San Diego Archaeology Library
- Historical Resources Board List
- Community Historical Survey
- Site Specific Report:

XIX. Utilities and Service Systems

- City of San Diego General Plan (Blueprint San Diego)
- Community Plan: Old Town San Diego Community Plan
- Site Specific Report:

XX. Wildfire

- City of San Diego General Plan (Blueprint San Diego)
- Community Plan: Old Town San Diego Community Plan
- San Diego County Multi-Jurisdictional Hazard Mitigation Plan
- Very High Fire Severity Zone Map, City of San Diego
- City of San Diego Brush Management Regulations, Landscape Regulations (SDMC 142.0412)
- Site Specific Report:



 Project Location

FIGURE 1
Regional Location

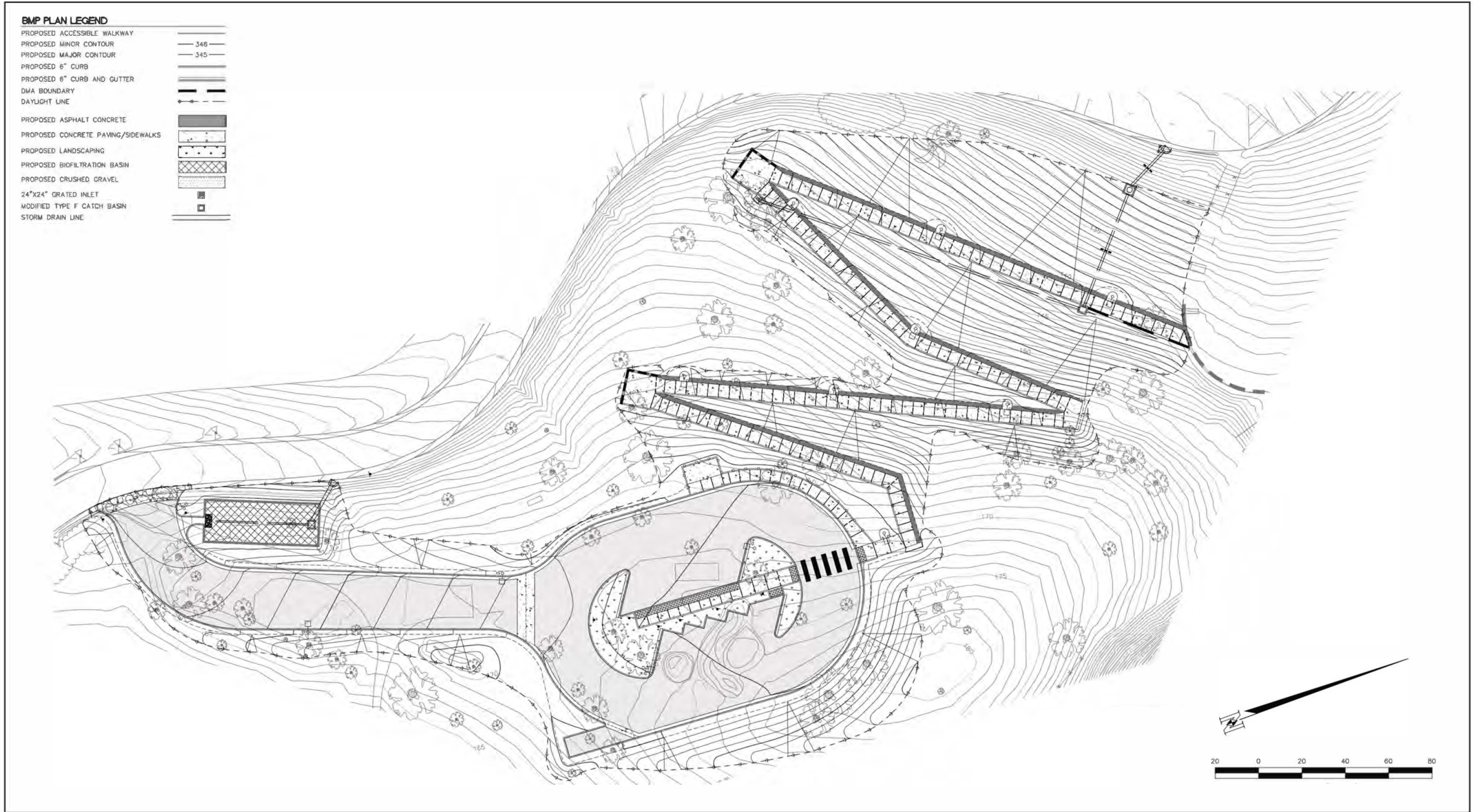
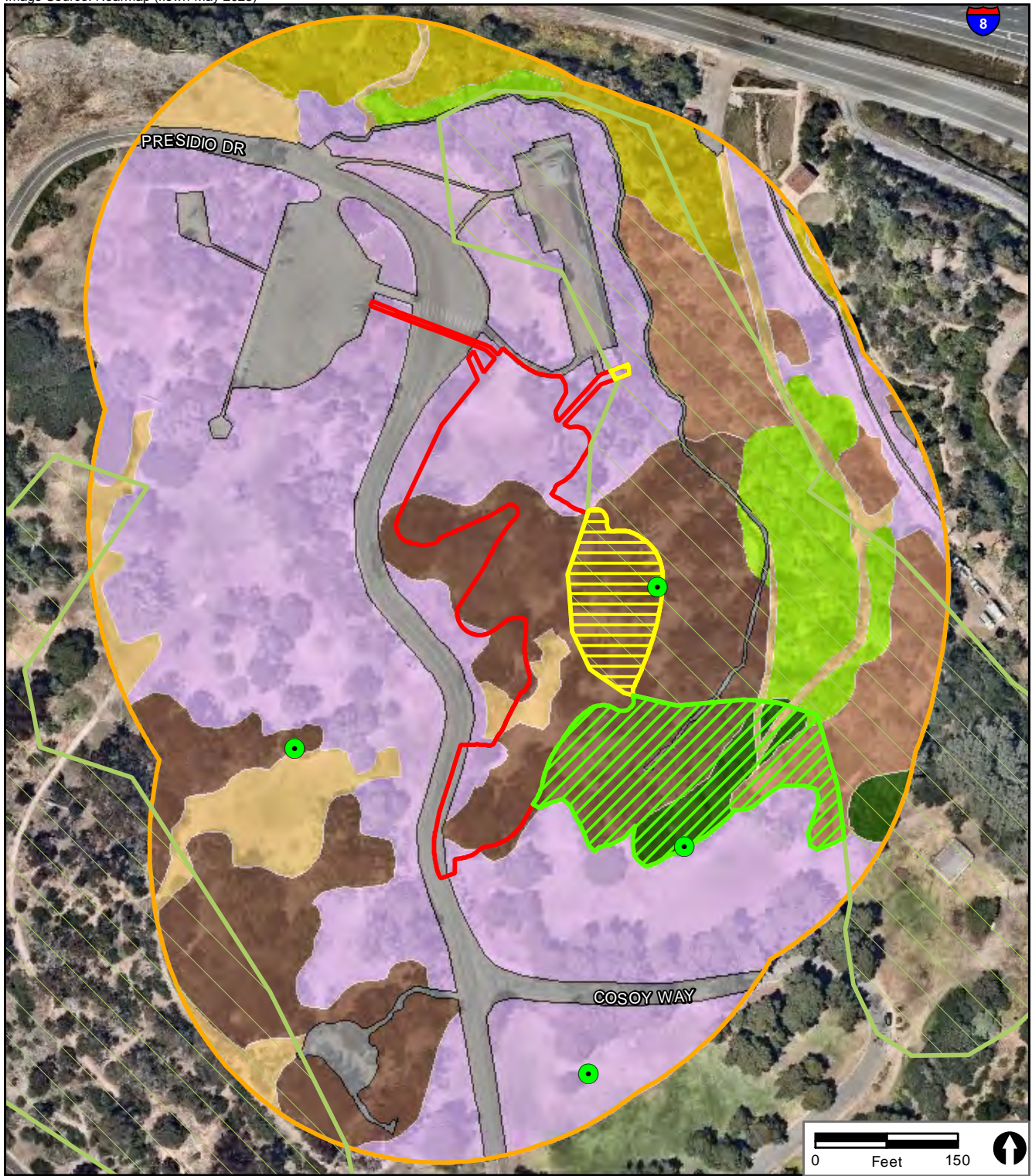


FIGURE 2
Proposed Project Components



- | | | |
|------------------------|--------------------------------------|-----------------------|
| Project Boundary | Monarch Butterfly Observation (2024) | Non-native Vegetation |
| Survey Area | Vegetation Communities | Eucalyptus Woodland |
| City of San Diego MHPA | Disturbed Southern Mixed Chaparral | Ornamental Plantings |
| MHPA Addition | Coast Live Oak Woodland | Disturbed Land |
| MHPA Subtraction | Non-native Woodland | Urban/Developed |

FIGURE 3
Proposed MHPA Boundary Line Adjustment