



THE CITY OF SAN DIEGO

ADDENDUM

Project No. 1109086
Addendum to EIR No. 96-9702
SCH No. 1997111070

SUBJECT: THE CAMBRIDGE SCHOOL: CONDITIONAL USE PERMIT for the construction of a new Pre-K through 12th grade private school campus with a three-story classroom building, one-story multipurpose building, and a track and sports field over a semi-subterranean two-level parking structure with 345 parking spaces and 41 surface parking spaces for a total of 386 parking spaces. The project entails the construction of a 182,868 square-foot (SF) 3-story classroom building, a 10,904 SF 1-story multi-purpose building and a track and sports field over a 128,624 SF semi-subterranean (two-level) parking structure on a graded, vacant property located at the southwest corner of the intersection of Camino Del Sur and Coyote Bush Drive. The 6.52-acre site (APN:678-690-7000, 678-690-7100, 678-690-7200) is in the CC-4-5 base zone and is designated Employment within the Black Mountain Ranch Community Plan Area. The site is also within Council District 5, Complete Communities: Mobility Choices Mobility Zone 4, Urban Village Overlay Zone, Cultural Resources Sensitivity Area: Low, Paleontological Resources Sensitivity Area: High. (LEGAL DESCRIPTION: PARCELS 1-3 OF PARCEL MAP NO. 21608, IN THE CITY OF SAN DIEGO, COUNTY OF SAN DIEGO, STATE OF CALIFORNIA). APPLICANT: The Cambridge School.

I. SUMMARY OF ORIGINAL PROJECT

As outlined in the herein, Development Services Department (DSD) has determined that the proposed project is consistent with the following environmental document, as addended, and their appendices, which are hereby incorporated by reference:

- Final Environmental Impact Report (FEIR) (SCH No. 1997111070) for the Black Mountain Ranch (Subarea I) Subarea Plan in the North City Future Urbanizing Area (NCFUA) (Project No. 96-7902), as amended, certified by the City Council on July 28, 1998, per City Council Resolution No. R- 290525.
- 2001 Addendum to the FEIR (SCH No. 1997111070) for the Black Mountain Ranch (Subarea I) Subarea Plan Subarea Plan in the North City Future Urbanizing Area (NCFUA) (Project No. 96-

7902), LDR No. 40-0528, certified by the City Council on November 27, 2001, per City Council Resolution R-295792

- 2009 Addendum to the FEIR (SCH No. 1997111070) for the Black Mountain Ranch (Subarea I) Subarea Plan Subarea Plan in the North City Future Urbanizing Area (NCFUA) (Project No. 96-7902), Project No. 142244

As used herein, the term “Black Mountain Ranch EIR” refers to the 1998 Black Mountain Ranch (Subarea I) Subarea Plan EIR and its subsequent addenda.

Black Mountain Ranch (Subarea I) Subarea Plan

The Black Mountain Ranch Subarea Plan (BMRSP) comprises the City’s statement of policy for growth and development of the Subarea I planning area, one of five subareas designated by the NCFUA Framework Plan. The BMRSP proposes a land use plan and open space system in general compliance with the requirements of the Framework Plan for the NCFUA and the City of San Diego’s Multiple Species Conservation Program (MSCP).

The majority of Subarea I is part of the approved Black Mountain Ranch II project (EIR DEP No. 95-0173; SCH No. 95041041). In October 1995, Black Mountain Ranch received approval from the San Diego City Council for use and development of 3,784 acres of their ownership. Of that total, 94 acres occur as open space within the Rancho Peñasquitos community planning area and lie outside the Subarea I boundary. As a consequence of the 1995 approval, 3,690 acres (or approximately 75 percent) of Subarea I is approved for use and development under the terms of Planned Residential Development (PRD) permit 95-0173, and its associated Vesting Tentative Map (VTM), Resource Protection Ordinance (RPO) permit, and development agreement. Under the terms of approval, a total of 1,121 residential units (942 single-family lots and 179 multi-family affordable units) would be developed. In addition, two 18-hole golf courses and a series of subordinate uses, including schools, public facilities, and reservoirs, would develop within Black Mountain Ranch. Approximately 2,871 acres of open space would be set aside, including 1,760 acres of dedicated resource open space which will be conserved under the MSCP and as part of the San Dieguito River Valley Regional Open Space Park, 53 acres for public parks, 132 acres for other parks and open space, 12 acres for desilting basins, 133 acres for a recycled water reservoir, and 607 acres for golf courses. In addition, areas were reserved for future development.

In support of these uses, the BMRSP included the construction of segments of and would reserve rights-of-way for several General Plan circulation element roads, including Camino Ruiz, Carmel Valley Road, Camino del Norte, and Black Mountain Road; location of a recycled water storage reservoir; construction of a 15-million-gallon potable water reservoir; and designation of specific sites for community facilities, including three public schools, community and neighborhood parks, sites for future fire stations, and a post office.

The Subarea I Environmental Impact Report (EIR) incorporates by reference the previously approved Black Mountain Ranch II development and addresses in detail the remaining 1,408 acres within Subarea I which include 893 acres within Black Mountain Ranch and the 515-acre perimeter properties held by 11 separate owners. The remaining 1,408 acres are proposed for development after a phase shift to Planned Urbanizing.

The 1,408 acres of new development are divided into discrete units: mixed-use northern village and high-density residential areas; the finger ridges north of La Jolla Valley; the 300-room resort/hotel; the mixed-use southern village; seven additional residential development clusters within Black Mountain Ranch; and the four groupings of perimeter ownerships. The project site is located within the North Village portion of the Black Mountain Ranch Subarea.

In November 2001, an addendum to FEIR 96-7902 was approved (2001 Addendum; LDR No. 40-0528), which included an amendment to the original Subarea I Plan; a third amendment to the Development Agreement; a revision to the approved North Village VTM; a Street Vacation; Rezone; Planned Development Permit (PDP); and Site Development Permit (SDP). These approvals allowed for the subdivision of approximately 642 acres for the development of 2,783 single and multi-family residences; a mixed-use community core with 450,000 SF of employment center and 140,000 SF of commercial/retail; 8 open space or park areas; and sites for an elementary, middle, and high school; a transit center; an SDG&E electrical substation; and construction of a northward extension Camino Ruiz and easterly Camino del Norte; and other on- and off-site utilities and infrastructure. The 2001 Addendum designated the project site for core residential (10-25 dwelling units per acre) uses.

In September 2009, an addendum to FEIR 96-7902 (2009 Addendum; Project No. 142244) was approved, which allowed for further refinement to the 1998 FEIR and the 2001 Addendum, including changes to land use designations and configurations within the undeveloped portions of the North Village within Subarea I, resulting in a revised development total of 1,433 residential units, a mixed-use village core with a 515,000-SF employment/office center with 225,000 square-feet of commercial/retail space; a 300-room hotel; 277.5 acres of open space and 5 individual park areas; a middle school site; a transit center; a fire station; and other on- and off-site infrastructure improvements on a 967.5 acre site. The project included changes in the North Village, Central Area, and East Clusters. Specific to the North Village area, in which the current project is located, the mixed use core was modified to include a radial street pattern, a shift of unused commercial square footage approved in the South Village and relocated to the North Village, a shift of commercial development within the North Village, and the relocation of a resort hotel to town center. The 2009 Subarea Plan Amendment did not increase the commercial intensity within the subarea as a whole but increased the commercial intensity in the North Village by moving approximately 44,000 SF of unused square-footage from the South Village to the North Village, resulting in a total of 119,000 SF of commercial uses within the North Village. The land use of the project site was redesignated from Multi Unit Residential to Employment.

II. SUMMARY OF PROPOSED PROJECT

Project Features

The 6.52-acre project site consists of three vacant parcels (APNs 678-690-7000, 678-690-7100, 678,690-7200) on a graded site located at the southwest corner of the intersection of Camino Del Sur and Coyote Bush Drive within the northern portion of the Black Mountain Ranch Community Plan area in the City of San Diego (**Figure 1, Regional Location** and **Figure 2, Aerial Photograph**). The project requires a (Process 3) Conditional Use Permit (CUP) for the construction of a new Pre K-12 private school campus with a 3-story classroom building, 1-story multipurpose building, and a track

and sports field over a semi-subterranean two-level parking structure (**Figure 3, Site Plan**). The project would relocate the existing Cambridge School, located at 12855 Black Mountain Road, to a larger proposed facility, increasing staff from 100 to 125, expanding student enrollment from 337 to 663, and widening the school's enrollment area. The 182,868 SF, 3-story classroom building would have a maximum building height of 63 feet at the tower peak/ridge, with parapets of varying heights ranging from 53 feet to 57 feet, 5 inches. The multipurpose building would be 10,904 SF with 3 levels of roof heights - 18 feet, 22 feet, and 35 feet. The parking structure would consist of 70,088 SF on level 1 and 58,536 SF on level 2 for a total of 128,624 SF. An Americans with Disability Act (ADA)-compliant sidewalk would provide access to the parking garage entrance along at the southern end of the garage. A sports field would be constructed on the deck of level 2, with bleachers along the western side of the field, field lights, and a scoreboard. A sports mesh fence would surround the track/sports field on top of the structure. The school would have a capacity of up to 663 students, consisting of Pre-K through 12th graders. Designated parking spaces for motorcycles and bicycles would be provided. Vehicular access to the project site would be provided by a new 30-foot-wide two-way driveway from Templeton Street to access the surface parking lot on the west side of the property, and a 24-foot wide driveway is proposed along Coyote Bush Drive to access the parking structure. Additionally, a 28-foot-wide emergency-only access with rolled-curb would be constructed along Templeton Street and a gate and Knox box within the project site would be utilized for emergency vehicle access to the project site.

The project is located within the Very High Fire Hazard Severity Zone (VHFHSZ) and would be constructed to 2022 California Building Code (CBC) Chapter 7A materials and construction methods for exterior wildfire exposure. Exterior walls would consist of tilt-up concrete panels, and the structures would have Class A roofing.

There are existing sidewalks and pedestrian curb ramps along the project frontage on Camino Del Sur, Coyote Bush Drive, and Templeton Street. Prior to project occupancy, the project would implement the following improvements: (1) upgrade the existing single curb ramp with two directional curb ramps at the southwest corner of Camino Del Sur/Coyote Bush Drive and northwest corner of Coyote Bush Drive/Templeton Street per current City standards, satisfactory to the City Engineer and (2) provide and privately maintain the pedestrian amenities per the Climate Action Plan (CAP) Consistency Regulations. These include pedestrian-scale lighting within private property along the project's frontages on Camino Del Sur, Coyote Bush Drive, and Templeton Street. Further details on these features are contained in the project's *Local Mobility Analysis* (**Appendix A**).

Additionally, based on a sight distance analysis prepared by the project's registered civil engineer, the project would install "no right turn on red" signs for northbound right-turns (Coyote Bush Drive) at the intersection of Camino Del Sur and Coyote Bush Drive. The project site is subject to the Complete Communities: Mobility Choices (CCMC) ordinance and is located within Mobility Zone 4. Therefore, the project would be required to pay an Active Transportation In-Lieu Fee per San Diego Municipal Code (SDMC) Section 143.1103(c).

Construction

Project construction would require grading across the entire 6.52-acre project site with 41,700 cubic yards (CY) of cut and 37,100 CY of fill, resulting in 4,600 CY of export. The maximum cut would be to

a depth of 17 feet, and maximum fill would be to a depth of 12 feet. Maximum cut and fill slope ratios would be 2:1. Construction is expected to occur over an approximately 16-month period. The project includes the following project design feature, aimed to reduce construction emissions:

PDF-AQ-1: Prior to the commencement of construction activities for the project, the grading and construction plan notes shall specify that all 100-horsepower or greater diesel-powered equipment is powered with California Air Resources Board (CARB)-certified Tier 4 Final engines or better.

An exemption from this requirement may be granted if (1) the applicant documents equipment with Tier 4 Final engines or better are not reasonably available, and (2) the required corresponding reductions in construction emissions can be achieved for the project from other combinations of construction equipment. Before an exemption may be granted, the applicant's construction contractor shall: (1) demonstrate that at least two construction fleet owners/operators in San Diego County were contacted and that those owners/operators confirmed Tier 4 Final equipment or better could not be located within San Diego County during the desired construction schedule; and (2) the proposed replacement equipment has been evaluated using California Emissions Estimator Model (CalEEMod) or other industry standard emission estimation method and documentation provided to the City of San Diego to confirm that project-generated construction emissions do not exceed applicable San Diego Air Pollution Control District's carcinogenic (cancer) risk threshold.

A qualified air quality monitor shall be on-site during the demolition, site preparation, grading, and building construction phases to confirm that all 100-horsepower or greater diesel-powered equipment employs Tier 4 Final or better equipment and that construction equipment that is certified less than Tier 4 Final is being used only where Tier 4 Final equipment or better is unavailable from vendors. When such equipment is being used, such equipment shall be installed with Diesel Particulate Filters (DPFs) whenever possible.

III. ENVIRONMENTAL SETTING

The project site is located at the southwest corner of the Camino Del Sur and Coyote Bush Drive intersection in the Black Mountain Ranch community of San Diego, consisting of three vacant parcels totaling 6.52 acres. The project site is bounded by Camino Del Sur to the north, Coyote Bush Drive to the east, Templeton Street to the south, and the property addressed 16067 Babcock Street to the west. The street frontages along Camino Del Sur, Coyote Bush Drive, and Templeton Street currently feature non-contiguous sidewalks. The 6.52-acre site was mass graded and generally descends to the northeast with elevations ranging from approximately 528 feet above mean sea level (MSL) in the southwest portion of the property to approximately 497 feet above MSL to the east (CTE 2023). The project area surrounding the site consists of a mix of urban developed uses and open space areas. Multi-family residential uses are located directly to the south, across Templeton Street; single-family residential uses are located to the north, across Camino Del Sur, with open space and undeveloped areas surrounding these uses and further north; a mixed-use affordable

apartment community is located on the parcel adjacent to the east of the project site, with commercial uses adjacent beyond; and to the west, an industrial park/office building, and a self-storage facility, with multi-family residential further west beyond the adjacent uses. The project site is within an area served by existing public services and utilities but is not currently serviced.

The site is zoned Community-Commercial (CC-4-5) and designated as Employment by the BMRSP. The project site is within the CCMC Mobility Zone 4, UVOZ, Cultural Resources Sensitivity Area: Low, and Paleontological Resources Sensitivity Area: High. The nearest airports to the project area include McClellan-Palomar Airport, approximately 11 miles to the northwest, and Marine Corps Air Station Miramar, approximately 10 miles to the south. The project area is not located within the Airport Influence Area, a Safety Zone, or Federal Aviation Administration notification area associated with either of these airports.

IV. ENVIRONMENTAL DETERMINATION

The City previously prepared and certified the Black Mountain Ranch EIR No. 586601/SCH No. 95041041 and Complete Communities Program EIR SCH No.2019060003. Both EIRs are hereby incorporated by reference. Based on all available information in light of the entire record, the analysis in this Addendum, and pursuant to CEQA Guidelines Section 15162, the City has determined the following:

- There are no substantial changes proposed in the project which will require major revisions of the previous environmental document due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
- Substantial changes have not occurred with respect to the circumstances under which the project is undertaken which will require major revisions of the previous environmental document due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- There is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous environmental document was certified as complete or was adopted, shows any of the following:
 - a. The project will have one or more significant effects not discussed in the previous environmental document;
 - b. Significant effects previously examined will be substantially more severe than shown in the previous environmental document;
 - c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
 - d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous environmental would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

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

V. IMPACT ANALYSIS

This Addendum includes the environmental issues analyzed in detail in the previously certified Black Mountain Ranch EIR, as addended, and the project-specific environmental analyses pursuant to CEQA. The analysis in this document evaluates the adequacy of the prior EIR (as addended) relative to the project and documents that the proposed modifications and/or refinements would not cause new or more severe significant impacts than those identified in the previously certified environmental documents.

The following includes the project-specific environmental review pursuant to CEQA. The analysis in this document evaluates the adequacy of the prior EIR relative to the project.

Land Use

BMRSP EIR

According to Section 4.A of the BMRSP EIR, potential land use plan consistency impacts related to the objectives of the General Plan would be less than significant as the BMRSP would be consistent with the environmental goals and objectives of the General Plan. The BMSRP included a Multi-Habitat Planning Area (MHPA) adjacent area but would be implemented consistent with the planning policies and guidelines for the MSCP Subarea Plan. Regarding compliance with the Resource Protection Ordinance (RPO), the Subarea I Plan was prepared consistent with the requirements of Council Policy 600-40 and, overall, is consistent with RPO with respect to encroachments to steep slopes, biology, and cultural resources; however, significant and unmitigated impacts were identified for wetlands encroachment. Additionally, the BMRSP EIR identified potentially significant impacts with the San Dieguito River Park (SDRP) Joint Powers Authority (JPA) Concept Plan for future development in the northeast perimeter property, which has potential to conflict with the viewshed in the SDRP La Jolla Valley landscape unit. Mitigation is identified requiring compliance with Community Design Guidelines (i.e., Design Standards in the BMRSP) to minimize visual and physical encroachment for subsequent tentative maps and planned development permits for future development to reduce the significant impact to a less than significant level. The BMRSP identified less than significant impacts associated with the Black Mountain Park Concept Plan and the remaining landscape units of the SDRP Concept Plan.

The EIR also concludes that the BMRSP's environmental plan consistency impacts would be less than significant because the BMRSP would implement a preserve area consistent with the MSCP Subarea Plan guidelines. A boundary line adjustment was proposed to remove approximately 13 acres of disturbed agricultural lands in active use and increase the MHPA within Subarea I by 31.5 acres, including 10.7 acres of Tier II coastal sage scrub, 2.7 acres of southern willow scrub, and 20.1 acres

of Tier IIIB non-native grassland. The boundary line adjustment would not affect populations of covered species or narrow endemic species and would increase the width of the MHPA in corridor areas linking the Subarea I open space with MHPA open space to the south and along La Zanja Creek. The adjustment would result in a preserve design which is equal or greater in Tier habitat values and enhance wildlife movement, and respect existing populations of covered species, narrow endemics, and off-site Tier habitat areas. Thus, the BMRSP EIR concludes there would be no environmental plan inconsistencies and identified no significant adverse impacts to the MHPA from the boundary line adjustment.

The 2001 Addendum included the provision of three trails in the North Village VTM, which were designed to minimize impacts to wildlife corridors and sensitive native vegetation and wildlife, in accordance with the MSCP Subarea Plan, and enhancement of an open space MHPA open space area with extensive plantings of oaks and grasses to provide an extension of a pedestrian/equestrian trail from La Jolla Valley northward to Camino del Norte. Mitigation identified in the 2001 for land use impacts (Measure 2a-f) includes a measure for MHPA Land Use Adjacency Guidelines to be made conditions of project approval on the tentative map for the North Village.

The 2009 Addendum included conveyance of remaining on-site MHPA to the City's MSCP preserve. An MHPA Boundary Line Adjustment (BLA) was approved on November 2007. The reconfiguration of the North Village VTM/PDP development area is not within the MHPA, nor does it encompass areas of sensitive hillsides or sensitive habitats or species, with the exception of the proposed location for Fire Station No.48, which was the subject of the above referenced BLA. Land use adjacency guidelines were incorporated into the North Village VTM/PDP Design Guidelines and Black Mountain Ranch Subarea design guidelines, as discussed above and would be applicable where development occurs adjacent to the MHPA.

Impacts associated with compatibility of the BMRSP with existing and future land use and land use policy consistency impacts were determined to be less than significant.

Project

The project site is designated as industrial employment in Figure LU-2 of the General Plan Land Use and Street System. This land use is further refined in the BMRSP, which designates the site for Employment use. The project would develop vacant parcels into a private school on a site that is zoned Community-Commercial (CC-4-5) and designated Employment in the BMRSP. The Community-Commercial (CC-4-5) designation allows for a mix of pedestrian-oriented, community-service commercial, and residential uses. Schools (K-12th grade) are an allowed use in the underlying CC-4-5 zone, with limitations. Per SDMC Section 141.0407(b)(3)(A), outside of a Sustainable Development Area, the facility design of K-12 schools shall not accommodate more than 300 students, with an exception for replacement of an existing school if the current enrollment is over 300 students and the result would not increase the number of students. As the project proposes a student enrollment of 663 students, it would exceed the maximum permitted enrollment in the CC-4-5 zone and a CUP is required pursuant to SDMC Section 141.0407(b)(3)(D).

The site is regulated by the North Village Community Design Guidelines. The overall goal of the North Village is to create a neighborhood that is self-contained and designed to support mass transit and non-automobile circulation. It is envisioned as a mixed-use neighborhood, developed around a

mixed-use core, transit facility and open space system interconnected by a pedestrian walkway and bicycle system. While planned predominantly for residential land uses, supporting uses such as educational, employment, and recreational facilities are included in the North Village. The project does not propose any deviations from the North Village Community Design Guidelines. The project would support the vision of the North Village by providing an educational facility and maintaining the walkability of the area through frontage improvements. Conformance with the requirements of the base zone would implement the General Plan and Community Plan Land Use. The Employment land use would be implemented by the Urban Village Overlay Zone (UVOZ) in the BMRSP and CC-4-5 zone. The purpose of the UVOZ is to provide regulations that will allow for greater variety of uses, flexibility in site planning and development regulations, and intensity of land use than is generally permitted in other Citywide zones. As such, the project is an allowed use and would be consistent with the Subarea Plan.

The project site is fully graded, in an urbanizing community, and does not contain designated open space or prime farmland. Thus, the project would not have an impact on designated open space or prime farmland. The site does not contain environmentally sensitive lands and, therefore, not subject to the Environmentally Sensitive Lands (ESL) Regulations, which replaced the RPO after the BMRSP was adopted. The project site is outside of and not adjacent to the MHPA and would not have direct or indirect impacts on resources in the MHPA; therefore, the MSCP Land Use Adjacency Guidelines are not applicable to the project. The project would also be consistent with the strategies and actions of the CAP to reduce citywide greenhouse gas (GHG) emissions by incorporating energy and water efficient building features, electric vehicle charging, bicycle parking, and street tree plantings. Additionally, the project would provide and privately maintain pedestrian amenities per the CAP Consistency Regulations, including pedestrian-scale lighting within the project site along the project's frontages on Camino Del Sur, Coyote Bush Drive, and Templeton Street. Thus, the project is consistent with the GHG reduction strategies in the CAP. Impacts associated with plan consistency would be less than significant and consistent with the analysis of the BMRSP EIR and addenda. No mitigation would be required.

Refer to the Noise subsection below for a discussion regarding land use and noise compatibility.

The project would develop vacant parcels with a private school. The proposed structures would be appropriate in the context of the surrounding residential and commercial uses and would not be of sufficient bulk or stature as to physically divide an established community. Therefore, the project would not physically divide an established community; impacts would be less than significant, consistent with the EIR and addenda, and no additional mitigation is required.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the EIR. The project would not result in any new significant impact, nor would a substantial increase in the severity of impacts from that described in the EIR result.

Traffic/Circulation

BMRSP EIR

Section 4.B of the BMRSP EIR addresses potential impacts to traffic/circulation. The development of Subarea I would generate approximately 57,992 daily trips. The BMRSP identified significant direct

and cumulative level of service (LOS) impacts on road and freeway segments as a result of the volume of traffic that would be produced by its implementation. The BMRSP identifies a range of possible mitigation measures based on traffic forecasts and assumptions related to the timing of future development projects. However, the BMRSP EIR determined that final traffic mitigation would be refined in connection with project-specific CEQA review of future tentative maps for specific development projects within the subarea. As a result, the BMRSP EIR expected that improvements and phasing could be modified and different mitigation measures or phasing may be provided, to the satisfaction of the City Engineer, so long as the mitigation measures to be implemented are determined to meet or exceed the level of mitigation provided for in the BMRSP EIR traffic analysis. Mitigation, in the form of circulation improvements, would reduce direct impacts to on-site roads to below a level of significance for some roads; however, impacts to segments identified in BMRSP EIR Tables 4B-14 and 4B-15 would remain significant and unmitigated.

Implementation of the BMRSP would also contribute to regional impacts on I-15 and short-term impacts within the NCFUA until buildout of the circulation system, resulting in a cumulatively significant impact. The proposed circulation improvements identified in the BMRSP EIR would not fully mitigate cumulative impacts to off-site road segments, and this cumulative impact is identified in the BMRSP as significant and unmitigated.

The 2001 Addendum did not include any changes or updates to the transportation analysis completed for the BMRSP EIR. The 2009 Addendum project included a re-designed street pattern with a radial grid system of streets and pedestrian circulation emanating for a central focal point. An updated traffic study was prepared in support of the 2009 Addendum (KOA Corporation 2008) to assess the possible traffic impacts resulting from the proposed modifications to the Black Mountain Ranch North Village VTM. The Subarea Plan, as proposed by the 2009 Amendment, would generate fewer average daily trips than expected to be generated by the adopted/approved Subarea Plan analyzed in the BMRSP EIR and the 2001 Addendum. Additionally, the redesigned radial grid street system and other proposed changes would require design of signalized intersections to operate at acceptable LOS and meet all signal planning warrants, as conditions of the permit. Thus, the 2009 Amendment concluded that transportation impacts resulting from the Subarea Plan amendments project would be consistent with the findings of the BMRSP EIR and no new mitigation would be required.

Project

At the time the BMRSP EIR was certified, CEQA required a transportation analysis to evaluate impacts based on traffic load and capacity of the street system using an LOS standard. Subsequently, California implemented Senate Bill (SB) 743 to modernize transportation analysis and transition lead agencies from analyzing traffic impacts under CEQA from a congestion-based LOS threshold to a vehicle miles traveled (VMT) threshold designed to assist the state in meeting its GHG targets. SB 743, as codified in Public Resources Code Section 21099(b), provides that automobile delay, as described solely by LOS or similar measures of vehicular capacity or traffic congestion, similar to what was used in the BMRSP EIR, shall not be considered a significant impact on the environment, except for transportation projects. As such, CEQA was revised and updated to prohibit use of LOS as the measure of the significance for transportation/circulation impacts. CEQA now requires the evaluation of transportation/circulation impacts using the metric of VMT, with the intent

to better align CEQA practices with statewide sustainability goals related to efficient land use, greater multi-modal choices, and GHG reductions, which updated how transportation impacts are evaluated under CEQA. The Complete Communities Program EIR (City 2020a, incorporated by reference into this Addendum) updated the City's CEQA significance thresholds by utilizing VMT analysis, as directed by SB 743. The Complete Communities Program EIR concludes that development in residential or commercial employment development areas located in VMT efficient areas with VMT efficiency (at or below 85 percent of the base year regional average VMT/resident or VMT/employee) would have less than significant transportation VMT impacts. Future development of similar types would be expected to have similar levels of VMT to existing development in that area. Impacts in less efficient VMT per capita areas (greater than 85 percent of the regional average) would remain significant and unavoidable. Although development under the Housing Solutions Regulations combined with improvements resulting from the Mobility Choices Regulations are anticipated to result in the implementation of infrastructure improvements that could reduce the per capita VMT, at a program level, it could not be determined whether those improvements would sufficiently reduce potentially significant VMT impacts to below the threshold of significance. VMT impacts associated with development under the Housing Program located in less VMT efficient areas would be significant and unavoidable.

Since SB 743 became effective after the approved entitlements, VMT was not discussed in the BMRSP EIR. Currently, the City's CEQA Guidelines require examination of whether a project would result in VMT exceeding thresholds identified in the City's Transportation Study Manual (TSM; City of San Diego current version dated 2022). The following analysis is based on the project's compliance with the City's TSM.

The project was evaluated under the VMT Screening Criteria for land development projects, and a VMT Assessment was prepared to evaluate the project's potential transportation VMT impacts consistent with the TSM (LOS Engineering 2026; **Appendix B, *Vehicle Miles Traveled Assessment***). Trip generation for the proposed project was estimated based on the existing Cambridge private school operations at 12855 Black Mountain Road in San Diego. The project proposes a maximum of 663 students and is expected to generate approximately 2,181 ADT with 762 (433 inbound, 329 outbound) AM school peak hour trips, 534 (205 inbound, 329 outbound) PM school peak hour trips, and 218 (78 inbound, 140 outbound) PM commuter peak hour.

Per the City's TSM, the proposed project would be considered a Regional Facility: Not Locally Serving. The project does not meet any of the screening criteria specified in the TSM. The project-specific VMT Assessment addresses the project's VMT impacts. The TSM identifies a significance threshold of a zero net increase in total regional VMT for a regional facility. The project is anticipated to lead to an overall increase in regional VMT due to relocating to a larger facility, increasing staff from 100 to 125, expanding student enrollment from 377 to 663, and widening the enrollment area. The project would result in a significant transportation VMT impact, as the total regional daily VMT would be expected to increase by 12,064, from 10,629 VMT to 22,682 VMT.

The project would have significant transportation VMT impacts based on City thresholds. Therefore, mitigation is required to reduce the project's significant VMT impact, to the extent feasible. The project would mitigate its significant VMT impact, to the extent feasible, through compliance with the City of San Diego's Complete Communities: Mobility Choices regulations. The project is located in

Mobility Zone 4, which requires the Owner/Permittee to pay an Active Transportation In Lieu Fee (ATILF). Under the Findings and Statement of Overriding Considerations from the Complete Communities Program EIR, payment of the ATILF can represent mitigation to the extent feasible for a project's significant transportation VMT impact. Thus, the project would be required to pay the current ATILF consistent with SDMC Section 143.1101.

The project is expected to exceed the City's VMT significance threshold and would therefore result in a significant VMT impact. Consistent with the Complete Communities PEIR Findings and Statement of Overriding Considerations, compliance with the Mobility Choices Regulations would be mitigation to the extent feasible.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the EIR. The project would not result in any new significant traffic/circulation impact, nor would a substantial increase in the severity of impacts from that described in the EIR result.

Biological Resources

BMRSP EIR

Biological resource impacts are discussed in Section 4.C of the BMRSP EIR. The BMRSP EIR identified significant direct biological resource impacts and included mitigation for upland vegetation and sensitive species and riparian vegetation. Identified impacts included the direct loss of 16.76 acres of Tier II coastal sage scrub, 12.9 acres of Tier IIIA southern mixed chaparral, and 0.3 acres of south willow scrub. Mitigation for impacts is provided by acquisition and conservation of equivalent or better Tier habitats at the time that development plans are submitted, with ratios based on the City's Biology Guidelines.

Cumulative impacts to non-native grasslands are identified based on the additional loss of 176.8 acres of Tier IIIB non-native grassland when added to the ongoing loss of open grassland in the region. Additionally, raptor foraging habitat and prey species would be adversely affected by grassland loss which contributes to the significant cumulative loss regionally. These impacts are identified as cumulatively significant, and no mitigation is provided that can reduce impacts to a less than significant level. Thus, cumulative impacts to native grasslands are identified as significant and unmitigated.

The BMRSP EIR identified direct impacts to 1.4 acres of disturbed wetlands. Impacts to wetlands and riparian habitat within the Black Mountain Ranch II VTM/PRD are being mitigated through a revegetation program approved by the United States Army Corps of Engineers (USACE), California Department of Fish and Game (CDFG; now California Department of Fish and Wildlife, CDFW), and City of San Diego. The further loss of 1.7 acres of wetlands from implementation of Subarea 1 would potentially be mitigated by extension of the approved program revegetation of riparian habitat along Lusardi Creek in La Jolla Valley. The revegetation plan would restore and enhance riparian areas that had been disturbed and denuded by prior agricultural use. Cumulative impacts to wetlands are identified in the BMRSP EIR as significant and unmitigated.

The BMRSP EIR identified impacts to a number of plant and wildlife sensitive species, including western dichondra, coast barrel cactus and dudleya (northeast), and ashy spike-moss, coastal California, orange-throated whiptail, San Diego horned lizard, southern California rufous-crowned sparrow, grasshopper sparrow, loggerhead shrike, black-shouldered kite, and blue grosbeak, gnatcatcher, that would be directly and/or indirectly significantly impacted. Mitigation for identified sensitive species include either MHPA habitat acquisition or the on-site coastal sage scrub revegetation program, which would reduce the significant direct and indirect impacts to these species to a less than significant level.

Edge effects from residential development adjoining the MHPA are identified in the BMRSP EIR as potentially significant, with required mitigation including restriction of construction activities adjacent to habitat areas during breeding seasons, incorporation of appropriate laned use adjacency guidelines, and implementation of erosion and sediment controls. Incorporation of these measures would reduce edge effects adjoining the MHPA to a less than significant level.

The 2001 Addendum discussed impacts to wetlands due to road and utility crossings, which were identified as significant and unavoidable in the BMRSP EIR. These crossings were approved in permits issued by CDFW and USACE. The 2001 Addendum states that no sensitive hillsides, habitats, or species or wildlife or plants would be affected by development of the North Village VTM; however, specific mitigation measures (such as fencing to delineate grading limitations; Measures 3-8) to reduce impacts to biological resources would be implemented in accordance with the MMRP.

The 2009 Addendum did not propose changes to the North Village VTM footprint, with the exception of the location of the proposed fire station, which added additional acres of impact to non-native grassland and disturbed habitat to the total impacted area previously analyzed. The MHPA trade parcel added as a result of the BLA would serve as mitigation for the additional impacts identified for the fire station site. The 2009 Addendum included mitigation measures to comply with the MBTA and preconstruction surveys during the raptor breeding season, with specific conditions identified by the Federal Endangered Species Act, the California Endangered Species Act, MSCP Conditions of Coverage to be applied or 300 to 500-foot avoidance buffers implemented.

Project

Impacts to native vegetation, including coastal sage scrub and all riparian/wetland impacts that were previously analyzed in the 2001 Addendum for Black Mountain Ranch II VTM/PRD have already occurred under permits from the City and resource agencies and have already been mitigated. The project site has been previously graded, is overlain with fill soil, is surrounded by urban uses, and contains ruderal vegetation. The project site is not located within or adjacent to the City's MHPA. Consistent with the City's Biology Guidelines (City of San Diego 2018), if the site has been legally graded or grubbed and/or is characterized by ruderal species, is not included in the City's MHPA, and does not support wetlands, or Tier I, II, or III habitat, it likely does not support significant biological resources. Based on the graded condition of the project site and the existing vegetation at the project site, the project would not result in impacts to sensitive species, sensitive habitat, wetlands, wildlife corridors, wildlife nursery sites, or conflicts with the City's MSCP. Mitigation

required as part of the BMRSP EIR and addenda have already been implemented as part of overall development of North Village. No impact on biological resources would occur; no additional mitigation is required.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the EIR. The project would not result in any new significant impact, nor would a substantial increase in the severity of impacts from that described in the EIR result.

Hydrology and Water Quality

BMRSP EIR

Section 4.D of the BMRSP EIR addresses potential impacts on hydrology and water quality. According to the BMRSP EIR, proposed changes to the natural drainage patterns of the Subarea I Plan area would not be significant, as the modifications would be primarily due to road crossings. The increase in runoff due to the placement of new streets, roads, and other hardscape surfaces could result in adverse impacts to drainage to the west, which can be mitigated to below a level of significance through design of a drainage system and incorporation of sediment basins and flow controls. Future development within Subarea I would use water surface elevations to provide design specifications for site drainage to protect individual sites and adjacent properties from increased runoff. Interceptor ditches and detention/desilting basins would be provided to allow water to accumulate and be released back to the natural watercourse at a rate similar to the existing conditions. Sediment basins would be placed in swales to protect downstream properties. Detailed design of any desilting basins recommended for the southeast perimeter property and Best Management Practices (BMPs; see paragraph below) would be required as conditions of subsequent tentative maps for development within these areas. Thus, the BMRSP EIR identifies drainage impacts as less than significant with mitigation incorporated.

The BMRSP EIR identifies potentially significant impacts to water quality in the San Dieguito River and Lagoon from implementation of the Subarea I Plan. Direct impacts to water quality would be mitigated to a less than significant level through implementation of the BMRSP EIR mitigation measure, which includes implementation of BMPs to reduce levels of erosion, sedimentation, and runoff during construction activities. These measures include hydroseeding and landscaping cut and fill slopes; delineation of areas of native vegetation to be avoided during construction; placement of artificial ground cover, hay bales, and catch basins if grading occurs during wet weather season; among other requirements. The mitigation also identified the potential need for detailed design and construction of additional desilting/detention basins in the southeast perimeter property. Implementation of the mitigation identified in the BMRSP EIR would reduce direct impacts to a less than significant level; however, cumulative impacts to San Dieguito Lagoon are identified as significant and unmitigable.

The BMRSP and surrounding off-site developments would contribute incrementally to urban runoff and pollutant loading, (hydrocarbons, nutrients, fertilizers, and pesticides) from impervious surfaces, golf courses, and landscaping, resulting in a cumulatively significant impact to the San Dieguito River and Lagoon. Thus, the BMRSP EIR identified significant, unmitigated cumulative water quality impacts.

The 2001 Addendum identified impacts associated with increased erosion, sedimentation, and runoff during construction activities and identified a number of mitigation measures (Measures 9-39) to reduce these impacts to a less than significant level.

The 2009 Addendum included re-designation of the 295-acre golf course location to hydro modification/open space, eliminating the water quality concerns arising from traffic, maintenance, water usage, and pesticide/herbicide usage that would have occurred under the previously designated golf course use. The facility would provide storm water management prior to discharge into Lusardi Creek. Implementation of the facilities in question, as well as the previously mentioned mitigation measures and BMPs listed in the BMRSP EIR are identified for reducing impacts to a less than significant level and no new mitigation measures were required.

Project

A project-specific hydrology and hydraulic report and Priority Development Project Stormwater Quality Management Plan (SWQMP) were prepared to address site-specific drainage and water quality conditions (Spears & Associates 2026a and 2026b; Appendix C, CEQA Hydrology & Hydraulic Report Appendix D, Priority Development Project Storm Water Quality Management Plan). The project site is undeveloped, previously graded, mostly bare, and slopes gently in a northeasterly direction with elevations ranging from approximately 497 to 528. The site drains northeasterly towards an existing detention basin located in the northeast corner of the site (refer to Figure 2). Additionally, 0.30 acres of off-site runoff from Coyote Bush Drive drain into the northeast corner of the site, with the entire runoff then draining to a headwall connecting to an existing 24-inch reinforced concrete pipe. Flows are then directed 1.69 miles through public storm drains to the San Dieguito River, and then an additional 7.9 miles to the Pacific Ocean (Spear & Associates 2026a). Development of the project would maintain existing drainage patterns. The project includes the construction of proprietary modular wetlands and underground detention in the northeast corner of the project site. Post development runoff would be directed to proprietary modular wetlands for stormwater treatment and underground detention to address hydromodification. Flows from the project site would be directed to the same drainage system as the existing conditions. Project improvements would mitigate on- and off-site runoff, with proposed peak runoff that would not be increased from the peak 100-year, 2 and 5 -year storm flows (Spear & Associates 2026a). Thus, development of the project site and placement of new pervious surfaces would neither result in a substantial increase in impervious surfaces and associated increased runoff or a substantial alteration to on- and off-site drainage patterns due to changes in runoff flow rates or volumes, nor significantly alter the drainage on- or off-site in such a manner. The project would not significantly alter existing drainage patterns at the project site or divert runoff from existing conditions. A project-specific analysis was prepared for the project, and it demonstrates that project design and regulatory requirements would ensure impacts would be less than significant. No additional mitigation is required.

The project is a Priority Development Project and would incorporate appropriate Site Design BMPs, Source Control BMPs, Structural BMPs, and Treatment Control BMPs (Spear & Associates 2026b). The project is subject to hydromodification requirements that would be satisfied using on-site flow through proprietary modular wetlands for stormwater treatment and underground detention that are sized in terms of area and depth for treatment. Additionally, the project would be required to

implement a SWQMP addressing the project's stormwater approach and compliance with the stormwater permit requirements. The project would be conditioned to comply with the City's Storm Water Regulations during and after construction, and appropriate BMPs would be utilized. Implementation of project specific BMPs would preclude violations of any existing water quality standards or discharge requirements. The project design has been reviewed by the City's engineering staff and would be conditioned to follow building construction guidelines to avoid flooding. Impacts associated with water quality would be less than significant, and no additional mitigation is required.

The potential for the site to be affected by a tsunami is negligible due to its eight-mile distance east of the Pacific Ocean. The project site is located approximately three miles south of the Olivenhain Dam and Reservoir. Based on the distance from the project site, and that inundation waters from Olivenhain Dam and Reservoir would drain along Escondido Creek (California Department of Water Resources 2026), the risk of seiches from this water body affecting the site is identified as negligible. The 4-S Ranch Reclamation Reservoir is located 0.9 miles east of the site, and a small water pond at the nearby Sante Fe Valley Water Reclamation Facility, is located approximately 0.25 miles north of the site. The project site is not within the inundation area for the 4-S Ranch Reclamation Reservoir (California Department of Water Resources 2026) and based on the small size and managed nature of the water pond at the Sante Fe Valley Water Reclamation Facility, impacts associated with seiches at the project site are minimal and less than significant and no additional mitigation is required.

The project would be serviced by the public water supply with no need for groundwater resources. The project site would be fully developed following completion of the project. While the project would increase the amount of pervious surfaces at the project site, it would not substantially alter the alter the rate of groundwater recharge due to the integration of BMPs that would be designed for infiltration. Proper surface and subsurface drainage would be required of the project and would be reviewed and approved by the City prior to the issuance of grading permits. The project would not rely on groundwater in the area and would not significantly deplete any groundwater resources. Impacts would be less than significant, and no additional mitigation is required.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the EIR. The project would not result in any new significant impact, nor would a substantial increase in the severity of impacts from that described in the EIR result.

Landform Alteration/Visual Quality

BMRSP EIR

Section 4.E of the BMRSP EIR addresses potential impacts associated with landform alteration and visual quality. According to the BMRSP EIR, none of the BMRSP areas contain steep slopes or other major topographic features, except the finger ridges fronting La Jolla Valley. Grading of the finger ridges may result in significant adverse effects; however, the potential landform impacts for the remaining planning area were not identified as significant. Future extensions of Carmel Valley Road, Camino Ruiz, and Resort Street would require additional cut and fill slopes or grading exceeding the City's thresholds. Cumulative landform alteration impacts are identified in the BMRSP EIR as significant based on the proposed road extensions and development of Sante Fe Valley and 4S

Ranch to the north and east and Fairbanks Highlands to the south. Mitigation is required for landform impacts, with measures to be incorporated into approvals to mitigate direct impacts for any future development within Subarea I. The mitigation requires the inclusion of guidelines for individual lot development for Subarea I that specifically address grading techniques to minimize large, manufactured slopes or major alterations to underlying terrain. The guidelines would place limitations on the severity of slopes and require blending and contouring to natural adjacent slopes with appropriate landscaping. Even with incorporation of the identified mitigation, the BMRSP identifies the direct and cumulative impacts associated with landform alterations as significant and unavoidable following the implementation of mitigation.

With regard to the existing visual character of the area, the BMRSP EIR identified significant visual impacts to the viewshed from Black Mountain Park and the SDRP due to the creation of manufactured slopes greater than 30 feet in height associated with grading for circulation element roads. These impacts would be partially mitigated by sensitive grading techniques; landscaping and revegetation; and compliance with the North Village Community Design Guidelines related to lot grading, siting of structures, architectural styles, setbacks and exterior use areas, other components that contribute to visual character. These design guidelines would maintain a consistent community character throughout Subarea I. However, direct and cumulative impacts associated with the visual character of the area would remain significant and unmitigated.

Views of the BMRSP area from existing surrounding development areas would not be significantly impacted; however, the development of the resort hotel within Subarea I is identified as a potentially significant impact, with mitigation incorporated to reduce the impact to a less than significant level. Architectural and landscape design and treatment are identified to mitigate potentially significant visual impacts from the development of the resort hotel.

Potential visual impacts from Subarea 1 to future development around La Jolla Valley and impacts to views from Black Mountain Park are identified in the BMRSP EIR as potentially significant. These impacts would be partially mitigated by future conditions of tentative maps and grading permits, including measures to restrict the size and aspect of residential lot grading, setbacks, and visually compatible landscaping around residential structures, among others. However, these impacts would remain significant and unavoidable.

The 2001 Addendum identified significant and unavoidable landform alteration and visual quality impacts, consistent with the findings of the BMRSP EIR. The North Village VTM requires grading over 590 acres of the project site and the construction of large, manufactured slopes. No new significant impacts were identified in the 2001 Addendum; however, the MMRP includes specific mitigation measures (Measures 40-43), which require creation of guidelines addressing grading techniques, grading plan incorporation of the guidelines, review of grading and landscaping plans by the City, and the provision of erosion control and hydroseeding for graded areas associated with major roads.

The 2009 Addendum identified that portions of North Village have already been mass graded and built out, with the grading footprint unchanged from the previously approved project. Development of the revised North Village VTM would result in direct and incremental cumulative impacts to the overall Subarea I development area. Impacts from grading for Camino Del Sur would still be significant and unmitigated as previously identified. Mitigation measures were adopted for landform

alteration and site design such as sensitive grading techniques, architectural treatments, landscaping, site planning for individual lots, border fencing, and lighting controls that would improve visual quality and community character. Therefore, while significant landform alteration/community character impacts would result, no new impacts are identified that were not included in the BMRSP EIR or 2001 Addendum.

Project

The project site has already been mass graded. While additional grading would be required to construct the project, these activities would not alter any natural landforms on the already graded site. The project's landform alteration impacts would be less than significant given the graded nature and the generally level topography of the existing site. Impacts associated with changes to the natural landform would be less than significant, and no mitigation identified in the BMRSP EIR would be applicable.

The BMRSP does not identify scenic corridors or viewsheds in the immediate project vicinity. The project would not have any impacts on designated view corridors nor substantially alter or block views from public viewing areas within the BMRSP area. The project site has been planned for development as part of the overall BMRSP, and construction of the project would not significantly alter views in the vicinity. Impacts would be less than significant, consistent with the findings of the BMRSP EIR and addenda.

The project would comply with the development regulations in the CC-4-5 zone. The proposed classroom building would be situated on the western portion of the site, with the multipurpose building located in the south-central portion of the site, and the parking structure and track/sports field placed on the eastern portion of the site. Aesthetically, the project buildings would feature modern building materials, including concrete tilt-up panels, aluminum metal panels for some window treatments, dual glazed high-performance glass, large format tile clad, architectural molding, glass doors, and painted steel frame overhang framing. The parking structure would be constructed of concrete tilt-up panels, with large format tile clad and parapets at the parking structure access point and at the northeast and southeast corners of the structure. A sports mesh fence would surround the track/sports field on top of the structure. Landscaping would comply with the Land Development Code (LDC) requirements and would be installed on and surrounding the project site, with screen planting around the parking structure. The existing street trees along Camino Del Sur, Coyote Bush Drive, and Templeton Street would remain, with missing trees along Templeton Street to be added. Segmental retaining walls would be required along a portion of the northern property line, which would be planted with climbing vines to provide visual softening of the wall. A small retaining wall would be required near the corner of Templeton Street and Coyote Bush Drive to facilitate access to the parking structure; however, this wall would be below the grade of the street and not visible from Templeton Street. All rooftop equipment would be screened from view. The project would comply with all applicable regulations and policies pertaining to visual character contained within the LDC and BMRSP.

The Design Standards identified in the Community Design Element of the BMRSP are intended to promote a compact, walkable, and pedestrian-friendly environment through thoughtful urban design standards. Key principles include:

- Creating active outdoor spaces such as courtyards, patios, gardens, plazas, and covered walkways to encourage social interaction and pedestrian activity.
- Orienting buildings toward streets and sidewalks with visible entrances, windows, and active ground-floor uses to enhance accessibility and safety.
- Prohibiting large parking lots, blank walls, and service areas along primary streets and pedestrian corridors to maintain an attractive streetscape.
- Locating parking areas and structures behind or within developments, screening them with landscaping or active uses, and minimizing driveway access points.
- Providing shaded sidewalks, pedestrian pathways, bicycle connections, and interconnected courtyards to support walkability and transit access.
- Using articulated facades, contextual building design, and carefully designed prominent buildings to create visual interest and civic identity.
- Incorporating pocket parks, plazas, and open spaces while ensuring building heights and massing relate appropriately to surrounding public spaces.
- Ensuring new development is compatible with adjacent buildings through coordinated scale, height, and architectural detailing rather than requiring a specific architectural style.

The goal of the BMRSP Community Design Element is to develop a traditional community of distinct, yet complementary neighborhoods, with the community's identity and sense of place established through a consistent overall design and fine-grained development. Repeating physical qualities, such as landscaping, massing of buildings, colors, and materials throughout neighborhoods serve to define the character for the neighborhood. The project design integrates the policy intent of the BMRSP Design Standards by providing a visually appealing development at the project site. BMRSP Design Standards are applied to the project, such as locating building entrances facing the streets, no parking between the front elevation of the school buildings and the public street, locating the project's surface parking lot to the interior portion of the project, the use of articulated walls along the building facades, providing landscape screening along the parking structure facades at Camino Del Sur and Coyote Bush Drive, and contextually designing the structures with the surrounding development. Therefore, the project would not negatively and substantially alter the visual character of the neighborhood. Impacts would be less than significant and consistent with the findings of the BMRSP EIR and addenda. No additional mitigation is required.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the EIR. The project would not result in any new significant impact, nor would a substantial increase in the severity of impacts from that described in the EIR result.

Cultural Resources

BMRSP EIR

Section 4.F of the BMRSP EIR analyzes the potential impacts on cultural resources resulting from implementation of the BMRSP. As discussed in the EIR, the Subarea I site has been subject to a

number of archaeological and historic site surveys in years preceding EIR preparation, including numerous surveys associated with the Black Mountain Ranch II Final EIR and additional investigations within the remainder of Subarea I in 1993. A total of 53 site locations were identified and evaluated for historical significance. Of these, two sites were found to be significant under the RPO and CEQA criteria (CA-SDI-5094 and CA-SDI-11,981), and five sites were found to be significant under CEQA criteria only (CA-SDI-4832.4833, -5103/12,657, -6673, -11,982, and -11,983). As conditions of the Black Mountain Ranch II VTM/PRD approvals, the RPO significant sites (CA-SDI-5094 and CA-SDI-11,981) and CA-SDI-6673 will be conserved in open space. CA-SDI-4832/4833 and CA-SDI 11,982 have had data recovery procedures performed prior to their destruction. CA-SDI-5103/12,657 and CA-SDI-11,983 will have data recovery procedures followed prior to their destruction due to construction of Camino Ruiz and Camino del Norte. All other sites were not found to be significant cultural resources and are not considered further. No additional archaeological or historical resources were identified during the 1993 surveys completed for the BMRSP EIR. The BMRSP EIR determined that adoption of the Subarea I Plan and associated future development outside that previously approved for the Black Mountain Ranch II VTM/PRD would not impact significant cultural resources. Thus, the BMRSP EIR did not identify any significant cultural resource impacts, and no mitigation was required.

The 2001 Addendum incorporated mitigation measures related to the construction of the alignment of Camino del Norte. These mitigation measures (Measures 44-50) implemented a Data Recovery Program to mitigate impacts to archaeological site CA-SDI-5,103 to below a level of significance.

The 2009 Addendum included a cultural resources study for the MHPA trade parcel that was proposed for a fire station site as part of the Subarea Plan amendments. No new cultural resource sites were identified during the updated records search. As the remainder of the area within the revised North Village VTM were within the BMRSP's grading footprint, and the BMRSP EIR found that the VTM would have no impacts on cultural resources within the North Village area, no changes associated with the status of cultural resources were identified for the remainder of the North Village VTM area.

Project

The project site is within the area previously analyzed in the BMRSP EIR and addenda. The project site has been previously disturbed by mass grading, with fill soils overlying the project site to at least a depth of 10 feet (CTE 2023). Mitigation identified in the EIR and addenda were implemented during the mass grading activities. Based on the results of previous surveys for the Black Mountain Ranch II Final EIR and updated records conducted for the 2009 Addendum (RECON, 2008), which found that there would have no impacts on cultural resources within the North Village area and no new cultural resource sites were identified, and the current on-site conditions, impacts associated with buried cultural resources (such as archaeological resources or tribal cultural resources) would not occur. Additionally, the project site is vacant, and there are no structures 45 years of age or older present, and no impact to the built environment would occur. Thus, no project impacts to cultural resources would occur. No additional mitigation is required.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the EIR. The project would not result in any new significant impact, nor would a substantial increase in the severity of impacts from that described in the EIR result.

Air Quality

BMRSP EIR

Air Quality is addressed in Section 4.G of the BMRSP EIR. The BMRSP EIR identified significant direct impacts on air quality as the project would not conform to the growth assumptions in the Regional Air Quality Strategy (RASQ) in place at the time of EIR certification. Additionally, the BMRSP EIR identified significant direct and indirect impacts to air quality as a result of construction-related activities and incorporated mitigation measures to reduce fugitive dust impacts during project construction and grading activities. Mitigation included minimizing the area being graded, use of low pollutant-emitting construction equipment or electrical equipment, watering unpaved construction areas, covering trucks hauling dirt and debris, sweeping of dirt and debris spilled onto paved surfaces and daily cleaning of construction-related dirt in dry weather, and covering or watering of on-site stockpiles. Measures to reduce operational emissions related to vehicle emissions were incorporated into the project through the siting of a transit center, the integration of bike lanes and racks at major activity centers, and other trip reduction strategies. Implementation of these measures would reduce the significant operational air quality impact to a less than significant level.

The 2001 Addendum did not contain additional analysis of air quality impacts. The 2009 Addendum identified significant direct and indirect air quality impacts to regional air quality as a result of construction-related activities, consistent with the findings of the BMRSP EIR. Despite the application of mitigation, the BMRSP EIR concluded that the original project would result in significant and unmitigated direct and cumulative impacts on regional air quality. Incorporation of the mitigation measures identified in the BMRSP EIR would reduce construction-related air quality impacts to below a level of significance. Measures to reduce VMT were incorporated into the North Village development. Operational impacts are identified in the 2009 Addendum as less than significant.

Project

A project-specific air quality technical study was prepared to analyze project air quality impacts (Bluescape Environmental 2025; **Appendix E, *Air Quality Technical Report***). The project site is designated for employment land uses in the City's General Plan. This land use is further refined in the BMRSP, which designates the project site for Employment, with Community Commercial (CC-4-5) zoning. Schools are an allowed use in the underlying zoning, with a CUP required over a certain enrollment level. Thus, the project would not contribute to growth in the region that is not already accounted for because schools are an allowed use (with a CUP) within the respective zone. Therefore, the project's impact would be less than significant, and no additional mitigation is required.

Implementation of the project would produce temporary air emissions during construction as a result of soil grading, heavy equipment operations, worker trips, deliveries/material hauling trips, and temporary power production. Construction equipment rated at 100 hp or more would meet Tier 4 engine standards as required by PDF-AQ-1, included as a condition of the permit. Based on the project-specific air quality analysis, the project's daily and annual emissions of criteria pollutants from construction activities would be well below the City's significance thresholds. The project would implement dust control activities as required by SDAPCD Rule 55 for fugitive dust, as well as additional control measures identified in the BMRSP EIR as part of the project design. As such,

construction impacts would be less than significant, consistent with the conclusions of the BMRSP EIR and addenda, and no additional mitigation is required.

Sources of operational emissions associated with the project include emissions from electricity consumption, vehicle trips, area sources, landscape equipment, and evaporative emissions as the structures are repainted over the life of the project. Operational emissions modeling was conducted in the project-specific air quality analysis. The analysis determined that the net daily and annual project operational emissions would not exceed the City's project-level significance thresholds. In addition, the project's incorporation of bike lanes and sidewalks would be consistent with the provisions of the BMRSP, including the mitigation for direct and cumulative operational air quality impacts. Impacts would be less than significant, and no additional mitigation is required.

Air pollution is largely a cumulative impact. The nonattainment status of regional pollutants is a result of the past and present development, and SDAPCD develops and implements plans for future attainment of ambient air quality standards. Based on these considerations, project-level thresholds of significance for criteria pollutants are relevant in the determination of whether a project's individual emissions would have a cumulatively significant impact on air quality. As demonstrated in the project's air quality analysis (and discussed above), the emissions of criteria pollutants would be below the significance levels during construction and operation of the project. In addition, the project is consistent with the existing zoning and land use designations for the site and would not result in additional population growth or growth-inducing effects. Therefore, the project would not result in a cumulatively considerable net increase of criteria pollutant emissions, and the impacts would be less than significant. No additional mitigation is required.

The project vicinity includes single-family residential homes across Camino Del Sur to the north, and single- and multi-family homes to the west and south. The neighborhood to the south between Paseo del Sur and Coyote Bush Drive is a single-family residential community and the closest sensitive receptors to the project site. The nearest school is Maranatha Christian School, located approximately 1,580 feet northwest of the project site. The project would emit toxic air contaminants (TACs) in the form of diesel particulate matter (DPM) during construction activities. Other TACs would be emitted during project operation, but the emissions would be very small compared to emissions of DPM from construction of the project. Based on the analysis contained in the project's air quality analysis, the health risk impacts from construction DPM at the nearest residential receptors would be well below the City's and SDAPCD's CEQA significance thresholds for cancer risk, chronic risk, and acute risk. Additional sensitive receptors such as the Maranatha Christian School would not be exposed to TACs in excess of the City's and SDAPCD's significance thresholds. The project's health risk impacts on the nearest sensitive receptors would be less than significant. No additional mitigation is required.

With regard to carbon monoxide (CO) hotspots, the City's Significance Determination Thresholds (City of San Diego 2022) indicates that an institutional project has a potential to result in a CO hotspot that could create health concerns if it would generate traffic equivalent to 950 single-family homes (9,500 ADT) or cause a roadway to deteriorate to LOS E or worse. The project would generate up to 2,181 ADT, which would not exceed the 9,500 ADT screening threshold. Additionally, the BMRSP (City of San Diego 2020b) designates LOS of A, B, and C to the roadways adjacent to the project site. The project site is not located in an area that is near any LOS D, E, or F intersections

which have the potential for CO hotspots. Thus, consistent with the BMRSP EIR and addenda, the project would not result in CO hotspots in the project area, and impacts would be less than significant. No additional mitigation is required.

Construction of the project at the site would involve the use of diesel-powered construction equipment. Diesel exhaust odors may be noticeable temporarily at adjacent properties during the construction period. Other construction odors may include architectural coatings and pavement applications; however, construction activities would be temporary, and odors associated with these activities are not considered significant. The proposed development of the site would not include industrial, agricultural, or other uses that are typically associated with objectionable odors. Therefore, consistent with the BMRSP EIR and addenda, project impacts associated with objectionable odors would be less than significant, and no additional mitigation is required.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the EIR. The project would not result in any new significant impact, nor would a substantial increase in the severity of impacts from that described in the EIR result.

Geology and Soils

BMRSP EIR

As stated in Section 4.H of the BMRSP EIR, development proposed for Subarea I would occur predominately within areas designated on the City of San Diego's map of geologic hazards and faults as having unfavorable geologic structure with low to moderate risk. Development of the project would involve substantial amounts of grading and landform alteration. No significant soil or geologic conditions were observed or known to existing within Subarea I; however, potentially significant geologic conditions existing within the area which would require mitigation as part of any future tentative maps. Implementation of the conclusions and recommendations of the geotechnical report prepared for Black Mountain Ranch (Geocon Incorporated 1991), which include general measures, and measures specific to grading, drainage and maintenance, and consultation and plan review, would mitigate the potentially significant effects within future development areas to a less than significant level.

With regard to erosion and sedimentation, the BMRSP EIR concludes that potential impacts could be significant and would require mitigation. Mitigation measures, which would be carried forward for future tentative map approvals within Subarea I, include requirements to limit erosion, including, but not limited to incorporation of short-term control measures during construction, placement of catch basins during grading, limitations on allowed grading activities, and the provision of permanent erosion control measures, among others. Implementation of these measures as conditions of approval for future development within Subarea I would reduce impacts to a less than significant level.

The 2001 Addendum did not contain additional analysis with respect to geology and soils. The 2009 Addendum restates the conclusions of the BMRSP, that while there are no significant soil or geologic conditions known to exist within Subarea I, potentially significant geologic conditions may exist, which would require mitigation as part of tentative future maps. In addition, development of the North Village would include measures to reduce the erosion potential by balancing grading within

the North Village and maintaining the drainage feature in the southern open space area. Both of these impacts would be mitigated to below a level of significance with implementation of previously identified BMRSP EIR mitigation measures.

Project

A project-specific geotechnical study was prepared for the project (CTE 2023; **Appendix F, *Geotechnical Investigation***) to address geologic conditions of the site. The site is not located within a local or State designated Earthquake Fault Zone, and no known active fault traces underlie or project toward the project site. The potential for ground rupture at the project site is considered low due to the absence of active faults at the project site. Impacts would be less than significant, and no additional mitigation is required.

The project site is located within seismically active Southern California, and the area is prone to ground shaking. The Newport-Inglewood Fault Zone, Elsinore Fault Zone, and the San Jacinto Fault Zones as well as other regional faults could subject the project site to significant shaking in the event of a major earthquake. The project site is underlain at depth by dense sandstone materials of the Tertiary Mission Valley Formation. Previously placed fill is present at the project site to a depth of at least 10 feet. According to the City's Seismic Safety Study, the site is situated in Geologic Hazard Categories 32 (low potential for liquefaction) and 53 (level or sloping terrain, unfavorable geologic structure, low to moderate risk). The proposed project would be required to comply with the CBC and SDMC. Compliance with the CBC, the SDMC, and the recommendations of the site-specific geotechnical investigation would ensure the project design would reduce potentially significant impacts associated with ground shaking and seismic hazards to a less than significant level, consistent with the BMRSP EIR and addenda. No additional mitigation is required.

Groundwater was not encountered during geotechnical explorations to a depth of 10 feet below ground surface at the project site. During the previous grading of the project site, topsoil alluvium and colluvium were removed, compacted to dense formational materials, and replaced as compacted fill. The compacted fill and the underlying dense formational materials are not considered liquefiable. Based on the presence of non-liquefiable soils and lack of a shallow groundwater table, the potential for liquefaction or significant seismic settlement at the project site is considered to be low. No evidence of landsliding or slope instability was observed across the relatively flat, graded site. Published geologic mapping indicates the site is considered "Generally Susceptible" to landsliding; however, no landslides are mapped at the project site or in the surrounding vicinity. Existing slopes at the project site were constructed at a gradient of 2:1 or less steep. For these reasons, landsliding is not considered to be a significant geologic hazard at the project site. Compliance with the CBC, the SDMC, and the site-specific geotechnical recommendations would be implemented as conditions of approval to ensure the project would not result in significant impacts associated with seismic hazards, including liquefaction, settlement, and landsliding. As a project-specific geotechnical report has been prepared for the project site, with recommendations specific to the project site, the project would implement those specific measures and would not rely on the mitigation measures identified in the BMRSP EIR, which are more general in nature and not site-specific. Impacts would be less than significant, and no additional mitigation is required.

The project would implement an erosion control plan that conforms to City-mandated grading requirements and standards in the Land Development Manual, which would ensure that proposed grading and construction operations would avoid significant soil erosion impacts. Soil disturbance would be required during construction, and compliance with the project-specific erosion control plan and local and state regulations related to erosion control would ensure there would not be a substantial loss of topsoil or erosion. Impacts would be less than significant, and no additional mitigation is required.

The desiccated upper portions of fill materials at the project site are considered to be potentially compressible in their current condition. Expansion testing of near surface soils generally indicates a low to moderate expansion potential. Based on the noted conditions and the site-specific grading recommendations of the geotechnical investigation, expansive soils are generally not expected to present adverse impacts. The project would comply with the SDMC, CBC, and site-specific geotechnical recommendations. Impacts would be less than significant, and no additional mitigation is required.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the EIR. The project would not result in any new significant impact, nor would a substantial increase in the severity of impacts from that described in the EIR result.

Natural Resources/Agriculture

BMRSP EIR

Natural Resources and Agriculture is addressed in Section 4.I of the BMRSP EIR. Implementation of the BMRSP would change the predominant existing land use within Subarea I from agriculture to residential, commercial, and resource open space. Although portions of the Subarea are identified in the BMRSP EIR as being in limited current agricultural use, no prime farmlands would be removed as a result of the BMRSP, and the loss of agricultural land is not considered a significant direct impact. The BMRSP EIR does, however, identify a significant cumulative impact associated with the loss of agricultural land from conversion.

Approximately 116 acres within Subarea I have been designated as Mineral Resource Zone 2 (MRZ-2), which are areas where adequate information indicates that significant mineral deposits are present or where it is judged that a high likelihood for their presence exists. The BMRSP EIR identified potential development of this entire area. The loss of the MRZ-2 aggregate resources, given its limited area and depth relative to the remaining resources available in the county is not identified as a significant direct impact in the BMRSP. The BMRSP EIR does, however, identify a significant cumulative impact associated with the loss of potential aggregate deposits.

The 2001 and 2009 addenda did not contain additional analysis with respect to natural resources/agriculture.

Project

The project site is not in use or planned for agricultural resources, nor is it located adjacent to any existing or planned agricultural uses. The BMRSP has envisioned development of the project site as

part of the overall buildout of Subarea I and has already analyzed the impacts on agricultural and mineral resources. Additionally, the project site is not located within MRZ-2, as shown in Figure 4I-3 on the BMRSP EIR. The project site is in a graded condition and has been planned for development as part of the BMRSP. No impact on agricultural uses or mineral resources would occur. No additional mitigation is required.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the EIR. The project would not result in any new significant impact, nor would a substantial increase in the severity of impacts from that described in the EIR result.

Paleontology

BMRSP EIR

According to Section 4.J of the BMRSP EIR, potential impacts to paleontological resources from future development within Subarea I would be potentially significant, based on the presence of underlying formational units exhibiting moderate to high potential for the occurrence of sensitive paleontological resources. The EIR Mitigation Framework includes mitigation, monitoring, and reporting requirements for paleontological resources that would be required as conditions of approval for future development within the northern and southern villages, the northwest and finger ridge residential clusters within Black Mountain Ranch, and the northeast and southwest perimeter properties. All future development within the BMRSP areas identified would be required to comply with the paleontological mitigation, monitoring, and reporting requirements identified in the BMRSP EIR. Compliance with required mitigation, monitoring, and reporting requirements would reduce paleontological resources impacts associated with development in Subarea I to below a level of significance.

The 2001 Addendum identified potentially significant impacts on the region's paleontological resources, based on the underlying Eocene La Jolla and Poway group of formations, which are of high paleontological sensitivity. As the North Village area has not undergone extensive grading, development within the northern cluster of the North Village VTM could result in the destruction of significant paleontological resources. These mitigation measures (Measures 51-58) generally mirror the BMRSP EIR mitigation, although minor updates to specific language were incorporated.

The 2009 Addendum identified no new impacts to paleontological resources, as no changes to the overall grading footprint were proposed. There would be no new significant impacts and mitigation measures identified in the BMRSP, as updated by the 2001 Addendum, and updated consistent with City monitoring standards, were incorporated into the 2009 project.

Project

The project site contains artificial fill, to a depth of at least 10 feet which is underlain at depth by dense sandstone materials of the Tertiary Mission Valley Formation (CTE 2023). Placed fill has no paleontological sensitivity, but Mission Valley Formation has a high paleontological sensitivity (City of San Diego 2022). Project earthwork is expected to require 41,700 CY cut at a maximum depth of 17 feet, with 37,100 CY of fill to a maximum depth of 12 feet. Because the project would require over 1,000 CY of excavation, potentially encountering the underlying Mission Valley Formation, impacts to

paleontological resources would be potentially significant. The project would be required to implement paleontological mitigation, monitoring, and reporting requirements, consistent with the mitigation required in the BMRSP EIR. The requirement for paleontological resources monitoring is also required by SDMC Section 142.0151. This mitigation is provided in Section VII, *Mitigation, Monitoring, and Reporting Program (MMRP) Incorporated into the Project*, of this document.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the EIR. The project would not result in any new significant impact, nor would a substantial increase in the severity of impacts from that described in the EIR result.

Noise

BMRSP EIR

According to EIR Section 4.K, development in future residential development areas, the North Village, and the northeastern and southern perimeter properties may be exposed to future projected traffic noise levels greater than the City's standards, resulting in a potentially significant traffic noise impact. The impact can be reduced to a less than significant level through implementation of mitigation. Mitigation identified in the BMRSP EIR includes a requirement for additional analyses to be completed for review of subsequent development permits. These analyses would determine detailed locations and heights of noise barriers, locations and widths of setbacks, and exterior to interior attenuation requirements to meet the City's standards.

Potential future construction-related noise impacts to existing residences are identified in the BMRSP EIR for development of the southwest perimeter property and North Village. Additionally, impacts on sensitive wildlife within the MHPA may result from grading and construction in the southeast, northeast, and south perimeter properties. The BMRSP EIR identified a potentially significant short-term impact associated with construction noise. Mitigation required construction activities to adhere to the hours established by the SDMC. For construction occurring adjacent to existing residences or the MHPA, noise-reducing measures are required as mitigation. These measures may include seasonal restrictions on grading during sensitive species breeding seasons, assuring that construction equipment is properly equipped with mufflers or other noise-attenuating equipment, or that temporary noise attenuating walls or barriers are installed during construction activities. The EIR mitigation requires these measures to be determined and included in future development proposals and shown on construction drawings or plans as mitigation measures.

The BMRSP EIR identified potentially significant noise impacts associated with the operation of sewer and water pump stations proposed within Subarea I. If pump stations generate nighttime noise levels greater than 57.5 dBA Leq at a residential property line, City standards would not be achieved, resulting in a significant impact. Mitigation is provided in the EIR that requires pump stations to be designed so that noise levels generated by the pump stations do not exceed the 57.5 A-weighted decibels (dBA) equivalent continuous sound level (Leq) at any residential property line. Implementation of this measure would ensure significant impacts associated with pump station noise would not occur.

Noise impacts from future flight operations at Marine Corps Air Station (MCAS) Miramar would not result in the exposure of people to significant noise impacts. Additionally, no significant noise

impacts would be generated by power lines or a potential future substation. Impacts associated with these issues are identified in the BMRSP EIR as less than significant. However, the BMRSP identified a measure to reduce nuisance impacts from aircraft overflights through the application of a disclosure statement that identified development within Subarea I as being located within the departure corridor used by fixed-wing aircraft departing MCAS Miramar.

The 2001 Addendum identified no significant adverse noise generation or exposure of sensitive receptors to high noise levels as a result of development of the North Village VTM. A perimeter noise barrier wall at the edge of the roadway or building pads along Camino Ruiz and Camino del Norte was included in the VTM. The 2001 Addendum included noise mitigation (Measures 59 and 60), which required implementation of sound attenuation barriers at the edge of residential building pads, and the preparation of a final acoustical reports for City review and approval to demonstrate that interior noise levels would be below 45 dBA CNEL along Camino Ruiz and Camino del Norte.

The 2009 Addendum identified future traffic noise levels which may exceed City standards in portions of the North Village. Noise-sensitive residential areas within the North Village have already been constructed and the required noise walls have been constructed. There were no new significant noise impacts identified in the 2009 Addendum.

Project

A project-specific noise analysis was prepared for the project (dBF Associates 2026; **Appendix G, Noise Analysis**), consistent with the requirement for additional analysis for subsequent development identified in the BMRSP EIR. The primary noise source in the project vicinity consists of vehicle traffic on Templeton Street and Camino del Sur. Based on sound level measurements taken as part of the noise analysis (2024), ambient noise levels along Templeton Street are 52.5 Leq, and 66.8 Leq along Camino Del Sur.

The project's traffic would contribute to future noise levels in the project area but would not be a significant source of vehicular noise due to the low volume of traffic it would produce (2,181 ADT) relative to the existing and future traffic volumes anticipated in the project area. In order to result in a 3 dBA increase in traffic noise (the minimal increase that would result in an audible noise change to the human ear), traffic volumes would have to double. The project's 2,181 trips would not result in a doubling of traffic on any roadway segments in the project area. Changes in the future noise environment would primarily be a result of vehicular traffic on Camino Del Sur. Based on a future year ADT volume of 21,900 vehicles, traffic volumes would increase by roughly 3.6 percent over the existing volumes, due to regional growth, including traffic associated with the project. Based on the expected increase in traffic, traffic noise is estimated to increase by approximately 0.2 dBA Community Noise Equivalent Level (CNEL), which is below the 3 dBA threshold of noise increase that is detectable to the human ear.

Thus, noise levels resulting from project traffic would remain about below the 3 dBA threshold required for an audible change in future and ambient noise in the project vicinity. The changes in ambient noise would not result in significant noise exposure to existing and future noise-sensitive land uses (NSLUs). Therefore, the project would not expose NSLUs in the project area to ambient noise that exceeds the City's noise standards, and impacts would be less than significant.

Future exterior vehicular traffic noise levels on the project site would range from below 60 dBA CNEL at the center and southern portions to approximately 68 dBA CNEL at the north property line. The noise level at the north building façade would be approximately 66 dBA CNEL. The noise level at the track and sports field stands would be 59 dBA CNEL. The noise level at the playground and plaza would be below 55 dBA CNEL. Noise levels at outdoor usable areas of the project would be less than 65 dBA CNEL; as such, the project would be considered Conditionally Compatible by the City of San Diego General Plan Land Use – Noise Compatibility Standards for K-12 educational uses. The noise level at the track lanes would be 68 dBA CNEL. According to the City's General Plan Noise Element Table NE-3, *Noise Compatibility Guidelines*, outdoor spectator sports are compatible uses at up to 75 dBA CNEL. Noise levels at the track would be less than 70 dBA CNEL; as such, the project would be considered unconditionally Compatible by the City of San Diego General Plan Land Use – Noise Compatibility Standards for Outdoor Spectator Sports uses.

Noise-sensitive land uses in the project area include the existing multi-family residences to the south and the development to the southeast, and the future multi-family residences under construction to the east. Operational noise sources associated with the project include heating, air conditioning, and ventilation (HVAC) systems; activities at the track and sports field; and project-generated traffic. During school hours, the project's HVAC system would produce a sound level of up to 43 dBA Leq at its southeast property line, and lower sound levels at the other property lines. The track and sports field would generate noise associated with weekday sports practices, occasionally small weekend daytime athletic events, and a once yearly Saturday graduation ceremony. Graduation would be the most intense usage of the track and sports field and would occur during daytime hours. Graduation would produce a sound level of approximately 53 dBA Leq at its south property line, 52 dBA Leq at its west property line, and lower sound levels at the remaining property lines. Because the most intensive use of the track and sports field would produce daytime sound levels of 60 dBA Leq or less, evening sound levels of 55 dBA Leq or less, and nighttime sound levels of 52.5 dBA Leq or less, the project would comply with the noise limits established by the SDMC. The project would comply with the existing regulatory framework and the City's development review process, which would ensure compliance with applicable noise standards and protect NSLUs in the project area from noise in excess of the required standards.

The primary noise associated with construction activities would be from site grading, resulting in short-term temporary increases in noise levels in the project vicinity. Construction associated with the project would include site preparation work; excavation of subgrade parking; foundation work; and building construction. These activities would generate temporary construction noise which would result in short-term elevated noise levels at nearby NSLUs. The City regulates noise associated with construction equipment and activities. SDMC Section 59.5.0404 contains standards related to hours and days of operation which would prohibit noise levels greater than 75 dBA LEQ (12-hour) at any residential property line. The residential uses to the south are the nearest NSLUs. Construction would generate noise levels up to approximately 68 dBA Leq at the project site's property lines, and thus, would not exceed the City's 75 dBA Leq noise threshold. As discussed above, the construction activities would comply with the requirements of the SDMC. Impacts associated with construction noise would be less than significant, consistent with the BMRSP EIR and addenda. No additional mitigation is required.

Construction activities associated with the project would have the potential to generate construction vibration. The closest residential structure is approximately 70 feet from the nearest project property line. During construction activities, this residence would be exposed to vibration levels of approximately 74 vibration decibels, which is equal to approximately 0.005 inches per second root mean square (rms) velocity. Construction vibration levels at vibration sensitive land uses would not exceed the 0.01 inches per second rms threshold established by the Federal Transportation Administration. In addition, the project does not include components that would generate vibration during long-term operation. Impacts associated with vibration would be less than significant, consistent with the BMRSP EIR and addenda. No additional mitigation is required.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the EIR. The project would not result in any new significant impact, nor would a substantial increase in the severity of impacts from that described in the EIR result.

Public Facilities and Services

BMRSP EIR

Section 4.L of the BMRSP EIR addresses whether implementation of the BMRSP would result in the need for and/or provision of new or physically altered public facilities and services (including school, parks, libraries, police, fire services, water utilities, waste management services, and electrical utilities), the construction of which could cause significant environmental impacts in order to maintain service ratios, response times, or other performance objectives.

According to the EIR, the additional elementary, middle, and high school students generated by the development of Subarea I would contribute to the already overcrowded schools, resulting in significant direct and cumulative impacts. Mitigation measures requiring the collection of required fees, setting aside three school sites, providing partial acreage for a future high school site, and implementation of a final financing agreement and phasing plan for future development. Implementation of these measures is identified in the BMRSP as sufficient for reducing school impacts to a less than significant level.

The BMRSP includes the provision of private open space and park areas to serve the residences' needs. Dedication of community and neighborhood park sites totaling 59 acres, and the proposed dedication of 2,211 acres of resource and amenity public open space, would provide adequate park and recreation facilities for future needs of the development and nearby communities. Impacts to parks are identified in the BMRSP EIR as less than significant. No mitigation was required.

The BMRSP EIR states that the Rancho Peñasquitos, Carmel Mountain Ranch, and Rancho Bernardo libraries would adequately serve the BMRSP area. Impacts to libraries are identified as less than significant, and no mitigation was required.

The EIR identified Rancho Santa Fe County Fire Department and the City of San Diego Fire Department as the providers of fire protection services in the BMRSP area. Sites for planned future fire stations were reserved in the southern and northern village areas of the BMRSP. Based on the distance between planned and existing fire stations and future development, the EIR indicates that it is likely that acceptable response times would be met; however, a potentially significant impact

would occur if response times could not be met. The BMRSP EIR provides mitigation requiring service letters from the San Diego Fire Department to be submitted for subsequent building permits. If response times cannot be met, then building plans would be required to include fire sprinkler systems or other measures to the satisfaction of the San Diego Fire Department. Implementation of the identified mitigation would reduce impacts associated with fire protection services to a less than significant level.

Reasonable police response times to the subarea for routine and emergency calls are anticipated; thus, the BMRSP EIR identified a less than significant impact on police services. No mitigation was required.

Water and sewer services are provided to Subarea I by the City of San Diego, with water supply from the City's Miramar Water Treatment Plant. The necessary improvements to facilities and infrastructure to support the development of Subarea I are proposed as part of development. These improvements would be sited and designed in consultation with the utility providers, City of San Diego, and the County Water Authority. The BMRSP identified an increase in demand for domestic water of 3.06 million gallons per day (mgd; this estimate excludes the previously approved Black Mountain Ranch II project). The BMRSP EIR identified a less than significant impact to domestic water, based on the relatively small increase, the use of recycled water for landscaping, and incorporation of conservation measures into the Subarea I developments. Impacts were identified as less than significant, and no mitigation was required. With regard to sewer facilities, the BMRSP EIR identified the potential need for additional capacity for the Carmel Valley trunk sewer for future buildout. Future applicants would be required to submit a sewer capacity analysis as a condition of future maps, with the applicant providing needed improvements to satisfy capacity needs. Impacts were identified as less than significant with implementation of the condition of approvals.

Implementation of the BMRSP would result in the generation of a significant amount of solid waste affecting waste management services including landfill disposal, refuse collection, recycling programs, and the City's ability to comply with State-mandated solid waste reductions. Additionally, the BMRSP would contribute to a cumulative impact on solid waste disposal facilities until additional landfills are sited. Required mitigation includes the development of a waste reduction/recycling plan to specify waste reduction measures to be incorporated into project design to minimize solid waste impacts. Impacts would be reduced to a less than significant level.

The 2001 Addendum did not contain additional analysis with respect to public services and facilities. The 2009 Addendum identified potentially significant impacts to schools due to overcrowding, with the payment of school fees, setting aside three school sites, the provision of partial acreage for a high school site, and implementation of a final financing agreement and phasing for future development in the North Village as sufficient actions for reducing the significant school impact to less than significant, consistent with the findings of the BMRSP EIR. The 2009 Addendum cites availability of utilities and infrastructure within the North Village as adequate to provide service to the proposed North Village development, with no significant adverse impacts to utility systems or service identified. Solid waste impacts are discussed in the 2009 Addendum, stating that the preparation of a Waste Management Plan (WMP) would be required as a permit condition, which would reduce significant cumulative solid waste impacts to a less than significant level.

Project

The project is a private school and would not generate new students for the public school system. The project would not be required to pay school mitigation fees per SB 50, as these fees are levied on new residential and commercial developments that would impact the public school system. Thus, no impact on schools would occur as a result of the project, and no additional mitigation is required.

The project would not generate new park users in the project area given its educational nature and that it would not generate new residents or a large number jobs in the vicinity that would result in population growth in the area (i.e., new residents moving to the project vicinity), resulting in increased demand on parks. New development would be subject to payment of Development Impact Fees (DIF) to offset demands for any new parks proposed in the community. Impacts would be less than significant, consistent with the BMRSP EIR and addenda, and no additional mitigation is required.

No new demand for library facilities would be generated by the project due to its use as a school site, which would not generate new residents in the area. As discussed in the EIR, construction of additional library facilities to meet library service requirements of the BMRSP is not required. New development would be subject to payment of DIF to offset demands for any new library facilities proposed in the community. Impacts would be less than significant, consistent with the BMRSP EIR and addenda, and no additional mitigation is required.

The project site is in an area served by San Diego Fire-Rescue Department and is served by Station 33, located approximately 3.1 mile east of the project site. The project would result in an incremental demand for fire protection and emergency response services, but the site has been planned for development as part of the overall BMRSP. Additionally, no changes in residential population would occur upon implementation of the project. The BMRSP EIR provides mitigation requiring service letters from the San Diego Fire Department to be submitted for subsequent building permits. The San Diego Fire Department reviewed the project, consistent with the requirements of the BMRSP EIR, for any impacts to response times and the provision of services and determined that the project would not significantly impact fire protection services. The project would be subject to payment of DIF to offset demand for new fire protection facilities identified in the community. Impacts would be less than significant, and no additional mitigation is required.

The project site is in an area served by the Northwestern Division of the San Diego Police Department. The proposed project would incrementally increase demand for police services, but the site has been planned for development as part of the overall BMRSP. As the project exceeds the threshold of 100,000 SF or more of non-residential construction per the City's CEQA thresholds (City 2022b), the San Diego Police Department was notified of the project. The San Diego Police Department did not raise any concerns related to the provision of services or response times. As discussed in the EIR, the BMRSP is expected to have a less than significant impact on police protection services. Thus, the project would not require new construction of police facilities which could result in physical changes to the environment. The project would be subject to applicable Development Impact Fees (DIF) for public facilities financing in accordance with SDMC Section 142.0640 to offset demands. Impacts would be less than significant, consistent with the BMRSP EIR and addenda, and no additional mitigation is required.

Regarding water and wastewater infrastructure, the project site is located in an area with existing development planned as part of Subarea I buildout. Water and wastewater services are already provided in the area, and the project would construct the necessary infrastructure improvements as part of the project's approval process. These improvements would include the installation of an 8-inch public line for fire service, a 1-inch public line for irrigation service, a 2-inch public water service line, and a 6-inch private sewer line within Templeton Street, which would connect to existing utility lines within the roadway. These improvements are part of the project and are included in the environmental impact analysis analyzed in this document. Thus, there would be no potential for significant environmental impacts associated with the construction of and/or improvements to utility infrastructure outside of those identified as part of project development. The project would maintain or improve the existing system in adherence with sewer and water regulations and conformance with the General Plan and BMRSP policies. Impacts would be less than significant, consistent with the BMRSP EIR and addenda, and no additional mitigation is required.

A project-specific WMP was prepared for the project (Atlantis Group Land Use Consultants; **Appendix H, Waste Management Plan**). Based on that analysis, the project would generate 396.8 tons of solid waste during project construction. The project's construction phase disposal rate would fall below the threshold for having direct impacts on solid waste services (i.e., 1,500 tons of waste or more). The project would achieve both 75 percent diversion of construction waste and would target an 85 percent diversion rate. The project would also recycle and/or salvage construction waste consistent with City C&D Ordinance. The project's estimated operational solid waste generation of 660.7 tons during project occupancy would remain above the 60 tons per year threshold established for cumulative solid waste impacts. Project diversion activities during occupancy would achieve a 50 percent diversion rate and the project applicant would implement an operational waste reduction program outlined in the WMP which would increase diversion and minimize the project's contribution to cumulative solid waste disposal. As a condition of approval, the applicant would be required to implement the operational waste reduction measures outlined in the WMP. Therefore, the project would comply with the City's ordinances related to the storage, diversion, and recycling of waste and would not affect the City's ability to achieve its waste reduction goals and help preserve solid waste capacity. Impacts would be less than significant, and no additional mitigation is required.

In summary, less than significant public service impacts would occur, and no additional mitigation is required.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the EIR. The project would not result in any new significant impact, nor would a substantial increase in the severity of impacts from that described in the EIR result.

Water Conservation

BMRSP EIR

Section 4.M of the BMRSP EIR addresses whether implementation of the Subarea plan (excluding the development associated with the previously approved Black Mountain Ranch II project) would result in impacts associated with water conservation. Based on the analysis contained therein, the BMRSP would incrementally increase the demand for domestic water service by 3.06 mgd. The BMRSP EIR

identified less than significant impacts based on the use of recycled water for landscaping and conservation measures that would be incorporated into development. If recycled water is not available at the time of development of Subarea I, potable water would be needed for irrigation. This would be a short-term impact and is identified as less than significant in the BMRSP EIR because irrigation requirements can be met by existing supply and with the construction of the 15 to 20 million-gallon Black Mountain Ranch reservoir. The BMRSP EIR identified a potentially significant contribution to cumulative water supply impacts, which would be reduced to a less than significant level through the implementation of mitigation. Required mitigation includes incorporating seven identified measures into future development project design guidelines to address cumulative water concerns. These measures are related to limiting grading, landscape specifications, and water conservation measures for construction.

The 2001 addendum did not contain additional analysis with respect to water conservation. The 2009 Addendum analyzed Water Supply impacts, which included the preparation of a Water Supply Assessment and Water Supply Verification Report. The 2009 Subarea Plan amendments decreased water use, as compared to the previously approved project, and incorporated numerous water conservation features. The 2009 Addendum states that the findings of the Water Supply Assessment and Water Supply Verification Report substantiate that there is a sufficient water supply to serve the 2009 project's existing and future water demands in normal, dry year, and multiple dry year forecasts and the project's proposed water use is within the water demand forecasts contained in water planning documents from water supply agencies; thus reinforcing that less than significant impacts with mitigation incorporated would occur, as identified in the BMRSP EIR.

Project

Water service is provided to the project site by the City's PUD. The project would be serviced by the existing public water supply using new connections. Existing building code regulations would serve to ensure water-efficient fixtures are installed with new development, and CalGreen requires a 20 percent reduction in indoor water use relative to specified baseline levels. Water conservation measures are required in the building construction, consistent with the requirements of CalGreen and the City's CAP. The project would include applicable water conservation measures, including the use of low-flow plumbing fixtures, irrigation controls and weather-based irrigation systems, landscaping requirements, and construction-phase water management measures, among others. While the BMRSP EIR contained mitigation measures to address cumulative water concerns, compliance with existing regulations would now ensure that water-efficient fixtures are installed with the project, water-saving measures are incorporated, and the project's demand for water is minimized. Therefore, application of the BMRSP EIR mitigation measures pertaining to water conservation are not required and the project would not use excessive amounts of water beyond available supplies. Impacts would be less than significant consistent with the BMRSP EIR and addenda. No additional mitigation is required.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the EIR. The project would not result in any new significant impact, nor would a substantial increase in the severity of impacts from that described in the EIR result.

Public Safety

BMRSP EIR

Section 4.N of the BMRSP EIR includes the known information about electromagnetic fields but reaches no conclusion as to the significance of the impacts of electromagnetic fields, stating that the existing scientific data are inconclusive and potential impacts are speculative in nature. No potential impacts related to hazardous materials are identified in the BMRSP EIR. One previous source of contamination was identified within Black Mountain Ranch that was remediated in coordination with the County Department of Environmental Health, and no other potential locations with hazardous materials have been identified. In summary, no potentially significant public safety impacts are identified in the BMRSP EIR, and no mitigation was required.

The 2001 Addendum did not contain additional analysis with respect to public safety. The 2009 Addendum contained a brief discussion of a San Diego Gas and Electric easement with power lines that traverses the project site. No development would occur within the 200-foot-wide easement and no significant impacts are identified from the development of the North Village VTM due to the restrictions and approval requirements associated with the easement. No mitigation was required.

Project

The project site is not adjacent to a corridor containing high voltage electrical lines; thus, any potential impacts from electromagnetic fields would be inconclusive and the same as those discussed in the BMRSP EIR. A Phase I Environmental Site Assessment (Marc Boogay 2024; **Appendix I, Phase I Environmental Site Assessment**) was prepared for the project site to assess the presence of recognized environmental conditions. The project site is not included on a list of hazardous materials sites identified by the California DTSC or the State Water Resources Control Board (SWRCB), or other databases searched as part of the Phase I Environmental Site Assessment effort. There were eleven sites within 1/8 of a mile of the project site that were listed in regulatory databases, with most involving storage and/or usage of hazardous wastes. However, none of these properties were identified as environmental concerns that would affect the project site. Previous agricultural usage of the project site was identified as a potential environmental condition of concern because previous pesticides and agricultural hazardous chemicals could remain in the soil. Soil sampling (UES 2024; **Appendix J, Environmental Sampling Results of Arsenic and Pesticide Residuals**) was conducted at the project site, and concluded that organochlorinated pesticide residuals were below regulatory levels of concern and arsenic in soil samples were representative of natural background arsenic levels in the project vicinity. As such, impacts associated with potential exposure to hazardous materials from hazardous materials sites would be less than significant, consistent with the BMRSP EIR and addenda, and no additional mitigation is required.

Implementation of the project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Construction of the project would involve the transport, use, and disposal of hazardous materials such as fuel, solvents, chemicals, and oils associated with operating construction equipment. Although small amounts of fuel, solvents, chemicals, and oils would be transported, used, and disposed of during the construction phase, these materials are typically used in construction projects and would not represent the transport, use, and disposal of actively hazardous materials. In addition, the transport

of the aforementioned materials would comply with all applicable regulations and requirements and therefore, would not create a significant hazard to public health, consistent with the BMRSP EIR and addenda. No additional mitigation is required.

The project is a private school. It would not generate hazardous emissions, or require the handling of hazardous or acutely hazardous materials, substances, or waste. Thus, the project would not result in hazardous emissions or the handling of hazardous materials, substances, or waste within 0.25 miles of a school. Impacts would be less than significant, consistent with the BMRSP EIR and addenda, and no additional mitigation is required.

Pertinent information regarding emergency response in the project area vicinity is provided in the County Multi-Jurisdictional Hazard Mitigation Plan (MJHMP) and related documents. The plan is a comprehensive resource document that serves many purposes such as enhancing public awareness, creating a decision tool for management, promoting compliance with state and federal program requirements, enhancing local policies for hazard mitigation capability, and providing inter-jurisdictional coordination. Developed with input from a number of County organizations, local cities and other entities, the Board of Supervisors for the County adopted the revised 2023 MJHMP on February 7, 2023 (County of San Diego 2023). The County General Plan includes information on emergency evacuation in the Mobility and Safety elements, with reference to the Office of Emergency Services Unified San Diego County Emergency Services Organization Operational Area Emergency Plan (County of San Diego 2022). Specifically, Annex Q (Evacuation) of the plan notes that: "Primary evacuation routes consist of major interstates, highways and prime arterials within San Diego County ...," with I-15 identified in the project vicinity. The County plan also notes that "Local jurisdictions will work with ... applicable agencies/departments to identify evacuation points and transportation routes." The project is located on a vacant parcel in a community that is developing according to the Subarea I plan. Existing major roads that provide a means for emergency evacuation are present and fully constructed in the project vicinity, with direct access to I-15 provided via Camino Del Sur, which changes to Camino del Norte to the east of Rancho Bernardo Road. The project would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan; therefore, impacts are less than significant, consistent with the BMRSP EIR and addenda, and no additional mitigation would be required.

The project site is located within a VHFHSZ and would be constructed to 2022 CBC Chapter 7A materials and construction methods for exterior wildfire exposure. Exterior walls would consist of tilt-up concrete panels, and the structures would have Class A roofing. As part of standard development procedures, the project plans would be submitted to the City for review and approval to ensure that adequate emergency access is provided to and from the project site. The project would be constructed to comply with the California Fire Code and SDMC requirements, and as such, would not expose people or structures to a significant risk of loss, injury, or death involving wildfire hazards. Impacts would be less than significant, and no additional mitigation is required.

The project site is not located in a 100-year floodplain or hazard zone (Federal Emergency Management Agency 2026). There would be no potential impacts related to flood hazards from implementation of the project. The project site is not located in an Airport Influence Area (AIA) for

local airports and would not present a hazard to air navigation; no impacts would occur, and no additional mitigation is required.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the EIR. The project would not result in any new significant impact, nor would a substantial increase in the severity of impacts from that described in the EIR result.

Population

BMRS EIR

Section 4.O of the BMRS EIR addresses potential impacts on population. The development of Subarea I and the proposed phase shift from Future Urbanizing to Planned Urbanizing would remove a barrier to population growth in the subarea. However, the BMRS EIR identified less than significant impacts associated with population, as the project is part of a comprehensive subarea planning program designed to anticipate and resolve indirect impacts caused by increased population. No mitigation was required.

The 2001 and 2009 addenda did not contain additional analysis with respect to population.

Project

The project entails the development of a private school in an area with existing development. The project would not require a new or major expansion of infrastructure serving the area. It does not include any residential uses, which would result in population growth. No impacts on population would occur; no additional mitigation is required.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the EIR. The project would not result in any new significant impact, nor would a substantial increase in the severity of impacts from that described in the EIR result.

VI. ISSUES NOT ANALYZED IN THE PREVIOUS EIR CEQA

CEQA Guidelines Section 15128, Effects Not Found To Be Significant, outlines that an EIR shall contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were therefore not discussed in detail in the EIR. The certified BMRS EIR provided a similar level of analysis, including those effects found not to be significant. Based on the environmental analysis, the City has concluded that the project evaluated in this Addendum is not expected to result in significant impacts beyond what was previously analyzed.

VII. SIGNIFICANT UNMITIGATED IMPACTS

BMRS EIR

The BMRS EIR identified significant impacts that would be mitigated to less-than-significant levels for Transportation/Circulation, Biological Resources, Hydrology/Water Quality, Geology/Soils,

Paleontological Resources, Noise, and Public Facilities and Services. The EIR identified significant and unmitigated direct impacts related to Land Use, Traffic/Circulation, Landform/Visual Quality, and Air Quality. The EIR identified significant and unmitigated cumulative impacts related to Land Use, Traffic/Circulation, Biological Resources, Hydrology/Water Quality, Landform/Visual Quality, Air Quality, and Natural Resources. The Direct (D) and Cumulative (C) impacts are noted below:

- Significant but Mitigated Impacts:
 - Traffic/Circulation: Freeway Segments (D/C)
 - Traffic/Circulation: Freeway Ramps (D/C)
 - Traffic/Circulation: Intersections (D/C)
 - Traffic/Circulation: Roadway Segments (D/C)
 - Biological Resources: Upland Habitats (D/C)
 - Biological Resources: Sensitive Species (D/C)
 - Biological Resources: Wetlands (D/C)
 - Hydrology/Water Quality (D)
 - Geology/Soils (D)
 - Paleontological Resources (D)
 - Noise (D)
 - Public Facilities and Services (D/C)
- Significant and Unavoidable Impacts:
 - Land Use (D/C)
 - Traffic/Circulation: Freeway Segments (D/C)
 - Traffic/Circulation: Freeway Ramps (D/C)
 - Traffic/Circulation: Intersections (D/C)
 - Traffic/Circulation: Roadway Segments (D/C)
 - Biological Resources: Loss of Non-Native Grasslands on Regional Level (C)
 - Biological Resources: Loss of Wetlands on a Regional Level (D/C)
 - Hydrology/Water Quality (C)
 - Landform/Visual Quality (D/C)
 - Air Quality (D/C)
 - Natural Resources" Agricultural Land and Mineral Resources (C)

Because there were significant unmitigated impacts associated with the original project approvals, the decision maker was required to make specific and substantiated "CEQA Findings" which stated: (a) specific economic, social, or other considerations which make infeasible the mitigation measures or project alternatives identified in the EIR, and (b) the impacts have been found acceptable because of specific overriding considerations. Given that there are no new or more severe significant impacts that were not already addressed in the previous certified EIR, new CEQA Findings and/or Statement of Overriding Considerations are not required.

The proposed project would not result in any additional significant impacts, nor would it result in an increase in the severity of impacts from those described in the previously certified EIR.

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

The project shall be required to comply with the applicable mitigation measures outlined within the MMRP of the previously certified BMRSP EIR, EIR No. 96-9702/SCH No. 95041041. No project-specific measures are required as outlined in the analyses herein. The following MMRP identifies measures that specifically apply to this project.

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

1. Prior to the issuance of any construction permits, such as demolition, grading or building, or beginning any construction-related activity on-site, the Development Services Department (DSD) Environmental Designee shall review and approve construction documents (CD) (plans, specification, details, etc.) to ensure the applicable MMRP requirements are incorporated into the design and/or construction documents.
2. In addition, the Environmental Designee 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 of San Diego (City) website: <https://www.sandiego.gov/development-services/forms-publications/design-guidelines-templates>.
4. The **TITLE INDEX SHEET** must also show on which pages the “Environmental/Mitigation Requirements” notes are provided.
5. **SURETY AND COST RECOVERY:** The DSD Director or City Manager may require appropriate surety instruments or bonds from private Permit Holders to ensure the long-term performance or implementation of required mitigation measures or programs. The City is authorized to recover its costs to offset the salary, overhead, and expenses for City personnel and programs to monitor qualifying projects.

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

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

Qualified Paleontological Monitor

Note: If all responsible Permit Holders' representatives and consultants fail to attend, an additional meeting with all party's present will be required.

CONTACT INFORMATION:

- a) The PRIMARY POINT OF CONTACT is the RE at the Field Engineering Division and can be reached at (858) 627-3200
- b) For Clarification of ENVIRONMENTAL REQUIREMENTS, contact call RE and MMC at (858) 627-3360

2. **MMRP COMPLIANCE:** This Project, PRJ-1129794 and/or Environmental Document EIR No. 586601, and EIR SCH No. shall conform to the mitigation requirements contained in the associated Environmental Document and be implemented to the satisfaction of the DSD Environmental Designee (MMC) and the City Resident Engineer. The requirements may not be reduced or changed, but may be annotated (i.e., 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 needed (e.g., specific locations, monitoring times, methodologies, etc.).

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

3. **OTHER AGENCY REQUIREMENTS:** Evidence of compliance with all other agency requirements or permits shall be submitted to the Resident Engineer and MMC for review and acceptance prior to the beginning of work or within one week of the Permit Holder obtaining documentation of those permits or requirements. Evidence shall include copies of permits, letters of resolution, or other documentation issued by the responsible agency.

None required

4. **MONITORING EXHIBITS:** All consultants are required to submit to Resident Engineer and MMC, 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 will be performed. When necessary for clarification, a detailed methodology of how the work will be performed shall be included.

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

5. **OTHER SUBMITTALS AND INSPECTIONS:** The Permit Holder/Owner's representative shall submit all required documentation, verification letters, and requests for all associated inspections to the Resident Engineer and MMC for approval per the following schedule:

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

PALEONTOLOGICAL RESOURCES

I. Prior to Permit Issuance

A. Entitlements Plan Check

1. Prior to issuance of any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits or a Notice to Proceed for Subdivisions, but prior to the first preconstruction meeting, whichever is applicable, the City Engineer (CE) and/or Building Inspector (BI) shall verify that the requirements for Paleontological Monitoring have been noted on the appropriate construction documents.

B. Letters of Qualification have been submitted to RE

1. The applicant shall submit a letter of verification to 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. or M.S. or equivalent in paleontology or 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 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 Precon 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 qualified paleontologist (PI) shall attend any grading/excavation related Preconstruction Meetings to make comments and/or suggestions concerning the Paleontological Monitoring program with the Construction Manager 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
 - a. Prior to the start of any work that requires monitoring, the PI shall submit a Paleontological Monitoring Exhibit (PME) based on the appropriate construction documents (reduced to 11x17) to 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.
3. When Monitoring Will Occur
 - a. Prior to the start of any work, the PI shall also submit a construction schedule to RE and/or BI indicating when and where monitoring will 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 review of final construction documents and geotechnical reports which indicate conditions such as depth of excavation and/or thickness of artificial fill overlying bedrock, presence or absence of fossils , etc., which may reduce or increase the potential for resources to be present.

III. During Construction

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

1. The 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 Construction Manager 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 OSHA safety requirements may necessitate modification of the PME.**
2. The PI may submit a detailed letter to 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 CSVr's shall be emailed by the CM to the RE and/or BI 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 Mitigation Monitoring and Compliance (MMC).
 2. The paleontological monitor shall notify the PI (unless paleontological monitor is the PI) of the discovery.
 3. The PI shall notify MMC of the discovery, and shall submit documentation to MMC 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. Night and/or Weekend Work

- A. If night and/or weekend work is included in the contract
1. When night and/or weekend work is included in the contract package, the extent and timing shall be presented and discussed at the precon meeting.
 2. The following procedures shall be followed.
 - a. No Discoveries

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

b. Discoveries

All discoveries shall be processed and documented using the existing procedures detailed in Sections III - During Construction.

c. Potentially Significant Discoveries

If the PI determines that a potentially significant discovery has been made, the procedures detailed under Section III - During Construction shall be followed.

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

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

1. The Construction Manager shall notify the RE, or BI, as appropriate, a minimum of 24 hours before the work is to begin.
2. The RE, or BI, as appropriate, shall notify MMC immediately.

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

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 Development Services Department. The Draft Paleontological Monitoring Report shall describe the methods, results, and conclusions of all phases of the Paleontological Monitoring Program (with appropriate graphics) to MMC 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's Paleontological Guidelines (revised November 2017), and submittal of such forms to the San Diego Natural History Museum and MMC with the Draft Paleontological Monitoring Report.
2. MMC shall return the Draft Paleontological Monitoring Report to the PI for revision or, for preparation of the Final Report.
3. The PI shall submit revised Draft Paleontological Monitoring Report to MMC for approval.
4. MMC shall provide written verification to the PI of the approved Draft Paleontological Monitoring Report.
5. MMC shall notify the RE and/or BI, as appropriate, 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 catalogued 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

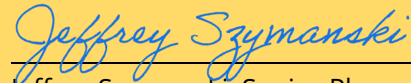
1. The PI shall be responsible for ensuring that all fossils associated with the paleontological monitoring program for this project are permanently curated with an accredited institution that maintains paleontological collections (such as the San Diego Natural History Museum).
2. The PI shall include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

D. Final Paleontological Monitoring Report(s)

1. The PI shall submit two copies of the Final Paleontological Monitoring Report to MMC (even if negative), within 90 days after notification from MMC 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 MMC, which includes the Acceptance Verification from the curation institution.

IX. CERTIFICATION

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



Jeffrey Szymanski, Senior Planner
Development Services Department

August 20, 2026

Date of Final Report

Analyst: M. WATANABE

Attachments:

Figure 1: Regional Location

Figure 2: Aerial Photograph

Figure 3: Site Plan

Prior Environmental Documents and Appendices (Under Separate Cover):

Environmental Impact Report No. 96-9702/SCH No. 1997111070

Addendum No. 142244/ SCH No. 1997111070

Addendum No. 40-0528/SCH No. 1997111070

Appendix A – Local Mobility Analysis

Appendix B – Vehicle Miles Traveled Assessment

Appendix C – CEQA Hydrology and Hydraulic Report

Appendix D – Priority Development Project Storm Water Quality Management Plan

Appendix E – Air Quality Technical Report

Appendix F – Geotechnical Investigation

Appendix G – Noise Analysis

Appendix H – Waste Management Plan

Appendix I – Phase I Environmental Site Assessment

Appendix J - Environmental Sampling Results of Arsenic and Pesticide Residuals

X. REFERENCES

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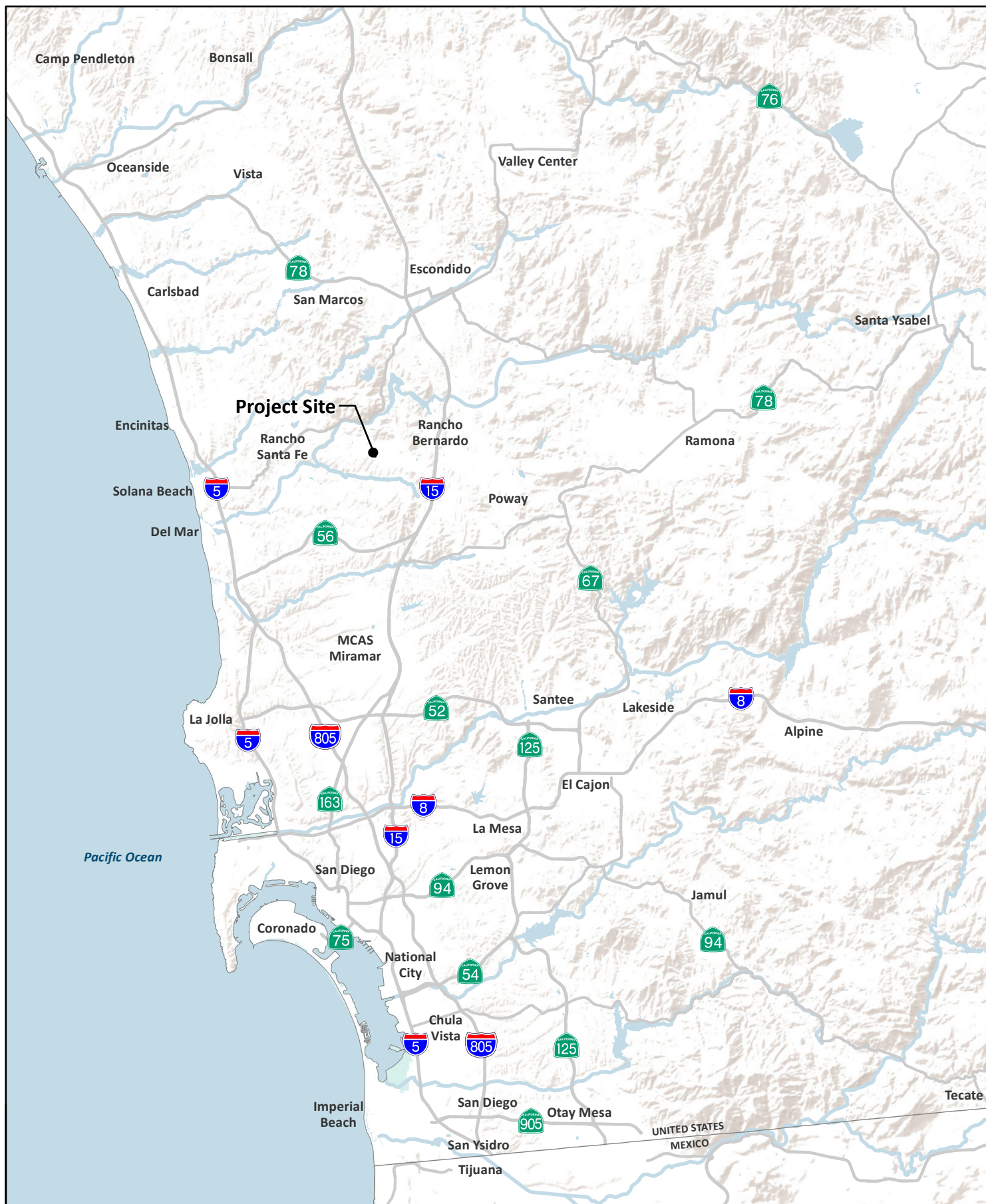
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RECON. 2008. North Village at Black Mountain Ranch Cultural Resources Letter Report.

Spear & Associates, Inc. 2026a. CEQA Hydrology & Hydraulic Report for The Cambridge School. February 11.

Spear & Associates, Inc. 2026b. Priority Development Project (PDP) Storm Water Quality Management Plan (SWQMP) - The Cambridge School PRJ-1109086. February 11.

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Source: SANDAG, Esri



Figure 1

Regional Location



Aerial Photo: Nearmap 2026

 Project Boundary

Figure 2

Aerial Photograph





THE CAMBRIDGE SCHOOL ADDENDUM