



THE CITY OF SAN DIEGO

ADDENDUM TO AN ENVIRONMENTAL IMPACT REPORT

Project No. 375960
Addendum to EIR No. 310690
SCH No. 2015111012

SUBJECT: VIRGINIA AVENUE PARKING GARAGE: COASTAL DEVELOPMENT PERMIT (CDP) TO AMEND CDP No. 40-0338, PLANNED DEVELOPMENT PERMIT (PDP), AND NEIGHBORHOOD USE PERMIT (NUP), to demolish a one-story building and associated paved parking lot, and to allow for the construction of a 5-level parking structure over 13,210 square-feet of retail space at the ground level, on the corner of Camino De La Plaza and Virginia Avenue to accommodate additional parking needs from the surrounding uses, including the Las Americas Premium Outlets and the International Border. The project requests a PDP for deviations to height limits, and setback requirements, which are described in Section I. The project is addressed at 4575 Camino de la Plaza in the CR-1-2 (Commercial Regional) zone within the San Ysidro Community Plan, Coastal Height Limit Overlay Zone, Redevelopment Districts, San Ysidro Discretionary Review Overlay Zone, Transit Priority Area, and the Federal Aviation Administration (FAA) Part 77 Notification area. (LEGAL DESCRIPTION: Lot 16 of International Gateway of the Americas Phase 1A, In the City of San Diego, State of California, According to Map Thereof No. 14259, Filed in the Office of the County Recorder of San Diego County on August 15, 2001, Assessor's Parcel Number 666-400-10.) APPLICANT: Baja-Mex Insurance Services, Inc.

I. SUMMARY OF PROPOSED PROJECT

A COASTAL DEVELOPMENT PERMIT (CDP) TO AMEND CDP No. 40-0338, PLANNED DEVELOPMENT PERMIT (PDP), AND NEIGHBORHOOD USE PERMIT (NUP), to demolish a one-story building and associated paved parking lot, and to allow for the construction of a 5-level parking structure over 13,210 square-feet of retail space at the ground level, on the corner of Camino De La Plaza and Virginia Avenue to accommodate additional parking needs from surrounding uses, including the Las Americas Premium Outlets and the International Border. The project is requesting to amend the existing CDP No. 40-0338 to remove the project site from the permit requirements because the project site is no longer a part of the Las Americas project due to the Community Plan Update zoning change; therefore, it is not within the Coastal Overlay Zone. The proposed PDP is requested for deviations from the required rear and side yard setback requirements, building height limits, and ground floor height limits. Project deviations are described in detail in the section below. The NUP is required to allow for an off premise directional signage.

The 5-level parking structure with roof deck would include retail on the ground floor, and approximately 349 parking spaces, on a 31,450 square-foot site. Of the 349 spaces, the parking structure would include eight accessible parking spaces, two of which would be van

accessible, and seven motorcycle spaces would be provided. The project would provide two parking spaces that are equipped with a cabinet, box, or enclosure that links the spaces with electrical service. One of those spaces would have the necessary electric vehicle supply equipment installed to provide active electric vehicle charging ready for use. The project would include three short-term bicycle parking spaces and three long-term bicycle parking spaces in secure bike lockers. In addition, the project would include five spaces for low-emitting, fuel-efficient vehicles and five spaces for carpool/vanpool vehicles, for a total of 10 parking spaces.

The project site is designated as Regional Commercial, which allows for commercial services and a density of 1.0 floor area ratio. The parking structure is excluded from the calculation of gross floor area, because it meets criteria (ii) and (iii) of San Diego Municipal Code Section 113.0234(d)(3)(B). The parking structure would be no taller than 70 feet in height and the maximum permitted height is 60 feet, however the project requests a deviation from this height limit.

The retail space on the first level of the parking structure would be covered with a colored plaster and aluminum storefront, and horizontal aluminum sun screens above the windows. The exterior of the parking levels would be screened from Camino De La Plaza and Virginia Avenue with a polyvinyl chloride (PVC) fabric mural and metal screen, and all open parking spaces on the roof deck would have horizontal PVC fabric screening on 50% of the total parking spaces. Furthermore, the project would have a façade that includes a large international graphic on the west wall of the building, and a monument sign would be located northwest of the parking facility. A landscape plan has been prepared in accordance with the City's Landscape regulations that will include maintaining the continuity with existing landscaping along Camino De La Plaza.

Access to the proposed project site would be via a driveway from Camino De La Plaza. The driveway would allow left turns (westbound to southbound) into the site; however, the driveway would restrict vehicles exiting the site to right turns via a raised median. Due to the proximity of the driveway to the Virginia Avenue intersection, westbound Camino De La Plaza would be widened and re-stripped to provide "side-by-side" turn lanes for left turn stacking between the proposed driveway and the Virginia Avenue intersection.

The following deviations are proposed:

- Deviation to San Diego Municipal Code Section 131.0531 Table 131-05(D) to allow a perimeter setback of 6.5 feet on the east side and a 5-foot west side setback where 10 feet is required for side yards; and a 3-foot rear-yard setback on the south side where 10 feet is required.
- Deviation to San Diego Municipal Code Section 131.0531 Table 131-05(D) for a building height deviation to allow for a maximum building height of 70 feet where 60 feet is allowed.
- Deviation to the San Diego Municipal Code Section 131.0548 for a ground floor height deviation to allow for an average 14 feet 8 inches with a minimum of 12 feet where the average of 15 feet with a minimum of 13 feet is required.
- Deviation to San Diego Municipal Code Section 142.1225 (B) Table 142-12C to allow approximately 489 square feet of combined wall sign copy area where 350 square feet is allowed along Virginia Avenue.
- Deviation to San Diego Municipal Code Section 142.1225(B) Table 1422-12C to allow approximately 266 square feet of combined wall sign copy area where 184.5 square feet is allowed along Camino De La Plaza.

- Deviation to San Diego Municipal Code Section 142.0404 Table 142-04C “Commercial Development” to allow the project to have 480 points from trees when 488.1 points are required.

Implementation of the project would result in the excavation of 30 cubic yards at a depth of cut of 2 feet, and 30 cubic yards of fill at a maximum depth of 0.3 feet.

II. ENVIRONMENTAL SETTING

The 31,954 square-foot lot is addressed at 4575 Camino De La Plaza (APN 666-400-10) in the CR-1-2 (Commercial-Regional) Zone within the urbanized community of the San Ysidro Community Planning area, within the City of San Diego (City), immediately north of the United States-Mexico International Border (See Figure 1-Location Map). The project site contains a one-story building and associated 54-space parking lot; however, this building and associated parking lot would be demolished.

The site is predominantly flat at an elevation of 56 feet above mean sea level (AMSL). Land uses immediately surrounding the site are commercial uses, including the Las Americas Premium Outlets to the west; the Outlets at the Border to the southwest; a transit center, and the Land Port of Entry from Mexico to the south and southeast; and parking lots to the northeast and east.

In addition, the project is located in the San Ysidro Community Plan, San Ysidro Commercial District, San Ysidro Discretionary Review Overlay Zone, Transit Priority Area, and the Federal Aviation Administration (FAA) Part 77 Notification area. The site is situated in a neighborhood of similar commercial uses, and currently served by existing public services and utilities.

III. SUMMARY OF ORIGINAL PROJECT

The San Ysidro Community Planning Area encompasses a total of 1,863 acres in the southernmost part of the City. The San Ysidro community lies south of State Route 905 (SR-905) and north of the international border with Mexico, primarily between Interstate 5 (I-5) and Interstate 805 (I-805), with some portions east of I-805 near Otay Mesa, and some west of I-5 adjacent to the Tijuana River Valley. Neighborhoods contained in San Ysidro include Southern, East Beyer and Hill Street, San Ysidro Historic Village, Sunset, and Suburbs.

A comprehensive update to the 1990 San Ysidro Community Plan was conducted by the City and approved November 15, 2016. The San Ysidro Community Plan Update (SYCPU) established land use designations and policies to guide future development consistent with the City's General Plan. The SYCPU is intended to implement the General Plan policies through the provision of community-specific recommendations. The SYCPU further expresses General Plan policies within the San Ysidro community through the provision of site-specific recommendations that implement citywide goals and policies, address community needs, and guide zoning. The SYCPU contains the following eight elements: Land Use; Mobility; Urban Design; Economic Prosperity; Public Facilities, Services & Safety; Recreation; Conservation; and Historic Preservation. Each of these elements identifies a series of goals and policies intended to guide future development within the San Ysidro community.

Discretionary actions required to implement the SYCPU, and addressed in the SYCPU Final Environmental Impact Report (SYCPU FEIR), included the Adoption of the SYCPU; Adoption of the San Ysidro Historic Village Specific Plan (SYHVSP); Creation of a Local Coastal Program (LCP); a General Plan Amendment; Rescission of the San Ysidro Planned District Ordinance (PDO); Amendments to the City's Land Development Code (LDC) for Adoption of a Rezone Ordinance to replace the San Ysidro PDO with citywide zoning; and approval of an Impact Fee Study (IFS). The SYCPU FEIR was certified by the City Council on August 5, 2016.

IV. ENVIRONMENTAL DETERMINATION

The City previously prepared and certified the **San Ysidro Community Plan Update Final Program Environmental Impact Report (EIR) No. 310690/ SCH No. 2015111012**. Based on all available information in light of the entire record, the analysis in this Addendum, and pursuant to Section 15162 of the State CEQA Guidelines, the City has determined the following:

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

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

V. IMPACT ANALYSIS

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

Project approval for the proposed project would allow for a multi-level structure that would include retail on the ground floor and approximately 349 parking spaces within the structure. The analysis provided in this Addendum indicates that there are no new significant impacts that would result from the project and that all project-level impacts can be fully mitigated. A comparison of the project's impacts related to those of the adopted SYCPU FEIR is provided below in Table 1 and discussed in detail below the table.

Table 1. Impact Assessment Summary					
Resource Area	SYCP FEIR Analysis	Project Level Analysis	Project Impact Conclusion	SYCP FEIR Mitigation	Project Level Mitigation
Land Use	Less than significant	No new impacts	Less than significant	No	No
Transportation / Circulation	Significant and unavoidable	No new impacts	Less than significant	Yes	No
Air Quality	Significant and unavoidable	No new impacts	Less than significant	Yes	No
Greenhouse Gas Emissions	Less than significant	No new impacts	Less than significant	No	No
Noise	Significant and mitigable	No new impacts	Less than significant	Yes	No
Biological Resources	Significant and mitigable	No new impacts	Less than significant	Yes	No
Historical Resources	Significant and unavoidable	No new impacts	Less than significant	Yes	No
Visual Effects and Neighborhood Character	Less than significant	No new impacts	Less than significant	No	No
Human Health / Public Safety / Hazardous Materials	Less than significant	No new impacts	Less than significant	No	No
Hydrology, Water Quality, and Drainage	Less than significant	No new impacts	Less than significant	No	No
Population and Housing	Less than significant	No new impacts	Less than significant	No	No

Table 1. Impact Assessment Summary					
Public Services	Less than significant	No new impacts	Less than significant	No	No
Public Utilities	Less than significant	No new impacts	Less than significant	No	No
Energy Conservation	Less than significant	No new impacts	Less than significant	No	No
Geology and Soils	Less than significant	No new impacts	Less than significant	Yes	No
Paleontological Resources	Significant and mitigable	No new impacts	Less than significant	Yes	No

Land Use

FEIR

The SYCPU FEIR identifies less than significant impacts for SYCPU's consistency with local plans, regional land use plans, policies and regulations. The SYCPU contains eight plan elements, each providing community-specific goals and recommendations, along with an implementation element. Overall, the proposed SYCPU incorporates goals and policies intended to support the General Plan policies.

The SYCPU FEIR discusses impacts associated with regulation consistency, including the Environmentally Sensitive Lands (ESL), Historical Resources, California Coastal Commission, and San Diego Forward Regional Plan. The SYCPU development footprint encroaches into ESL areas. The SYCPU FEIR identifies less than significant impacts to ESL areas on a program-level, as individual future projects would be required to comply with ESL Regulations or process a Site Development Permit to deviate from the regulations. Historical resources are known to occur within the SYCPU area including historic structures, properties, and historic districts, as well as archaeological resources. Impacts from future development on historical resources in the SYCPU area would occur at the project level. Due to the presence of historical resources, future development within the SYCPU area would be required to comply with the City's Historical Resources Regulations that require any recorded resources be evaluated for significance/importance in accordance with criteria listed in the Historical Resources Guidelines. The southwestern portion of the proposed SYCPU area is located within the Coastal Overlay Zone, generally south of I-5 and west of Willow Road within the Dairy Mart Ponds and Tijuana River Valley. The Coastal Act requires projects within the Coastal Overlay Zone to be consistent with standards and policies addressing public access, recreation, marine environment, land resources, development, and industrial development. The proposed SYCPU includes an LCP Land Use Plan. The SYCPU FEIR determined that the LCP would be consistent with the Coastal Act, and no associated land use policy consistency impacts would occur. Furthermore, the SYCPU is consistent with the goals of the San Diego Forward Regional Plan to focus growth in areas that are already urbanized and that connect communities with transit.

The SYCPU FEIR also includes an analysis of environmental plan consistency. Specifically, consistency with the City's Multiple Species Conservation Plan (MSCP) Subarea Plan and the Multi-Habitat Planning Area (MHPA). Encroachment into native vegetation within the western MHPA would be related to the connection of Calle Primera to Camino De La Plaza.

The proposed connection of Calle Primera through the MHPA would not significantly impact the goals of the MSCP as the MSCP Subarea Plan (Section 1.4) identifies roads as an allowable use within the MHPA, provided they are identified in a community plan circulation/mobility element as collector streets essential for area circulation and necessary maintenance/emergency access roads. The proposed road connection would be a collector road and; therefore, would be an allowable use within the MHPA. Future development along the eastern edge of the SYCPU would not be an allowed use in the MHPA. Future development 100% within the MHPA may request a MHPA boundary line adjustment; however, given that boundary adjustments require equal or better biological values and must meet MHPA boundary line equivalency criteria and obtain approval from the Wildlife Agencies, boundary adjustments would be considered less than significant.

The SYCPU FEIR determined that potential land use plan consistency impacts associated with the Brown Field and Imperial Beach Naval Outlying Landing Field (NOLF) Airport Land Use Compatibility Plans (ALUCP) would be less than significant. The City's General Plan and the LDC contain regulations to ensure that new development proposals are consistent with ALUCP policies. Compliance with these regulations would ensure that future development would be compatible with airport operations.

Community Division

The SYCPU FEIR determined that the proposed SYCPU would not physically divide an established community, and associated land use impacts would be less than significant. Community connectivity would be enhanced by provisions in the proposed SYCPU that establish two villages and improved pedestrian, bicycle, and transit amenities. Land use impacts associated with division of an established community would be less than significant.

Proposed Project

Land Use Consistency

General Plan/Community Plan

The proposed project site consists of the existing facility and associated 54-space parking lot. The project would include the demolition of the existing building and parking lot, and the construction of a multi-level parking structure with 13,210 square feet of retail space on the first floor. The proposed project would be consistent with the proposed land uses described in the General Plan and community plan. The SYCPU identifies the project site as being within the San Ysidro Commercial District. The proposed project would be consistent with the land uses analyzed in the SYCPU FEIR. The proposed project site is designated as Regional Commercial, which serves an area beyond the community. This designation allows for commercial services, and a density of 1.0 floor area ratio. The parking structure is excluded from the calculation of gross floor area because it meets criteria (ii) and (iii) of San Diego Municipal Code Section 113.0234(d)(3)(B). The proposed project site has a zoning designation of CR-2-1, which allows regional-serving commercial and limited industrial uses with an auto orientation, but no residential use. As discussed in Section I, the project would comply with the development regulations of the Land Development Code in the CR-2-1 zone, except for the deviations related to setbacks, building heights, and ground floor heights.

Local Coastal Program

The proposed project is located in the eastern portion of the San Ysidro Community Planning area immediately north of the United States-Mexico International Border. According to

Figure 1-1 of the San Ysidro Community Plan and Local Coastal Program Land Use Plan, the proposed project is not within the boundaries of the Coastal Zone and would not conflict with the Local Coastal Program Land Use Plan.

Environmentally Sensitive Lands/MHPA

The proposed project site does not contain Environmentally Sensitive Lands (ESL) areas, nor is it located on Multi-Habitat Planning Area (MHPA) lands. The site is disturbed and does not contain sensitive habitat nor does it support sensitive plant or wildlife species. The proposed project is not located in or adjacent to any MHPA lands. Therefore, the proposed project would not result in significant impacts to biological resources.

Historical Resources

Built Environment

The project site consists of the existing 2,400 square foot facility that was constructed in 2001. Since the existing structure is not 45 years old or older, it does not require review as a historical resource.

Archaeological Resources

On September 22, 2015, qualified City staff (QCS) conducted a California Historic Resources Information System (CHRIS) database search and no recorded sites were identified in the project boundary. QCS determined that no additional archaeological evaluation is required and monitoring is not required.

AB 52 (Tribal Cultural Resources)

Pursuant to the requirements Assembly Bill (AB) 52 (CEQA Statute § 21080.3.1) on June 8, 2017, notification was sent to Tribal Representatives. Subsequently on July 14, 2017, City staff met with Tribal Representatives for consultation on this project and there were no further concerns to tribal cultural resources. Mitigation was not required and consultation was closed for this project.

Airports

The proposed project is located within the Federal Aviation Administration (FAA) part 77 Notification area for Brownfield Airport; however, it was determined the project would not require FAA Notification. Further, the project is not located within the Airport Land Use Compatibility Plan (ALUCP) Overlay Zone, the project would not conflict with the ALUCP.

Community Division

The proposed project includes the demolition of an existing building and parking lot and the construction of a multi-level parking structure with 13,210 square feet of retail space on the first floor. The proposed action would not physically divide an established community; there would be no impacts.

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 a new significant impact, nor would it result in a substantial increase in the severity of impacts from that described in the EIR.

Transportation / Circulation

FEIR

Traffic Circulation

The SYCPU FEIR analyzed traffic impacts for the SYCPU area based on full implementation. The SYCPU FEIR concluded that there would be significant traffic impacts at 31 roadway segments, 25 intersections, 1 I-5 freeway segment, and 2 SR-905 freeway segments. Program level impacts would be reduced through the identification of necessary roadway, intersection and freeway improvements. Mitigation or construction of these improvements would be carried out at the project-level via the IFS, capital improvement projects, Caltrans projects, and through development funding. Implementation of the improvements **TRF-1** through **TRF-54** of the SYCPU FEIR would reduce impacts of the SYCPU on local roadway segments and intersections. Improvements **TRF-1** through **TRF-35** are included in the IFS and will be implemented based on funding generated by development fees; however, if the IFS were underfunded, improvements **TRF-1** through **TRF-35** would not be feasible. Other improvements are identified in **TRF-36** through **TRF-54**. However, no identified funding sources exist for these improvements because they are not included in the IFS. While implementation of the improvements **TRF-1** through **TRF-54** would reduce impacts on roadway segments to acceptable levels, the City cannot assure that these improvements would be implemented because the sufficiency of future funds is not certain. Thus, the impact of the SYCPU with respect to roadway segments and intersections is considered significant and unavoidable.

Alternative Transportation Modes

The proposed SYCPU contains goals and policies intended to promote enhanced public transit facilities, access, connection, service within the community, and biking. Goals of the Mobility Element include a circulation system that provides for enhanced transit throughout the border region and village areas, provides for enhanced bicycle access throughout the region, and includes pedestrian friendly facilities. The SYCPU FEIR concluded that, when implemented, the policies would improve connectivity and accessibility and would result in a less than significant impact on alternative transportation modes.

Proposed Project

Traffic Circulation

RCE Traffic Engineering prepared a Traffic Impact Analysis (November 2017) to determine the project specific trip generation for the proposed project. Based on field surveys and counts of existing facilities it was determined that 2,820 new average daily trips would be generated including 84 AM peak hour (57 in : 27 out) trips and 218 PM peak hour (109 in : 109 out) trips. The proposed project would not result in significant impacts to study area road segments or intersections under the existing, near term or horizon year 2035 scenarios. As such, project-specific impacts along roadway segments and at intersections in the project vicinity would be less than significant and would not result in any new significant impacts; no additional impacts are anticipated to occur compared to the program-level analysis described in the SYCPU FEIR. No mitigation would be required.

Alternative Transportation Modes

Virginia Avenue has planned to become a new port of entry for pedestrians between the USA and Mexico. In addition to thousands of expected pedestrians, Virginia Avenue is now a new transit center for the San Diego Metropolitan Transit Services, with buses, taxis, and

drop off/pickup locations on the street. The proposed project is consistent with the goals of the mobility element; therefore, the proposed project would not result in a new impact to alternative transportation modes.

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 a new significant impact, nor would it result in a substantial increase in the severity of impacts from that described in the EIR.

Air Quality

FEIR

The SYCPU FEIR found that the proposed SYCPU would increase the amount of development within the SYCPU area over that which could occur under the 1990 San Ysidro Community Plan. The land designated for commercial uses would increase by 7 percent. Due to these changes, the SYCPU was found to be inconsistent with the San Diego Regional Air Quality Strategy (RAQS), which relied upon growth assumptions from the 1990 San Ysidro Community Plan. However, while the proposed land uses under the SYCPU were not included in the emissions assumptions contained within the RAQS, the vehicle trips from the SYCPU would be less than those anticipated from the 1990 San Ysidro Community Plan, and would result in lower mobile source emissions. The SYCPU minimizes vehicle miles travelled, and consequently minimizes air pollutant emissions. Therefore, the SYCPU FEIR found that the SYCPU would be generally consistent with the intent of the RAQS and would not impede the goals contained within the RAQS.

The SYCPU FEIR found that development pursuant to the SYCPU would generate criteria air pollutants during both construction and operation. Operational source emissions would originate from traffic, energy use, and area sources. Impacts from construction of individual projects was assumed to be potentially significant because the exact number and timing of individual development projects that would occur as a result of implementation of the SYCPU were unknown. Emissions associated with vehicle trips, energy use, and area sources would exceed the screening-level thresholds for volatile organic compounds (VOCs), carbon monoxide (CO), inhalable particulate matter (PM₁₀), and fine inhalable particulate matter (PM_{2.5}), and would result in a significant impact with respect to conformance with State and federal ambient air quality standards. The SYCPU FIER identified the following mitigation framework measures that would reduce these impacts. **AQ-1** requires proposed development projects to identify construction-related air quality impacts using the latest available California Emissions Estimator Model (CalEEMod) and identify potentially significant impacts. **AQ-2** identifies best available control measures/technology that should be incorporated by future development that would exceed emissions thresholds. **AQ-3** requires individual development projects to submit a traffic control plan prior to the issuance of a grading permit. **AQ-4** requires proposed development projects to identify operational air pollution emissions using the latest available CalEEMod model, and to incorporate a CO hot spot analysis. If the operational air quality impacts are significant, **AQ-4** requires the incorporation of mitigation to reduce such impacts. Finally, **AQ-5** requires development applications to include energy-efficient street lighting, where it is proposed. After mitigation, the SYCPU FEIR considered air pollutant impacts from construction and operation to be significant and unavoidable because the ability of future developments to implement the mitigation could not be guaranteed.

The SYCPU FEIR found that buildout under the SYCPU could result in a cumulatively considerable net increase in criteria pollutants, and considered the impacts to be significant and unavoidable.

Regarding sensitive receptors, the SYCPU FEIR found that there could be a potential for CO hotspots at 25 intersections from implementation of the SYCPU. Impacts from residential and other sensitive uses being located near freeways and being exposed to diesel particulate matter were considered potentially significant, especially given the areas proximity to the international border and associated heavy truck traffic. Mitigation measure **AQ-4** requires mitigation for CO hot spot impacts directly linked to development under the SYCPU. In addition, **AQ-6** required a health risk assessment be prepared for any facility within the buffer area identified by the California Air Resources Board (CARB) for Toxic Air Contaminants (TACs).

Odor impacts were found to be less than significant in the SYCPU FEIR.

Proposed Project

A site-specific Air Quality Study was prepared for the proposed project in December 2017 (Harris & Associates 2017a) and is relied upon for the following analysis.

The proposed project is consistent with the land use designation for the site contained in the SYCPU. The growth assumptions in local community plans form the basis for the development of the San Diego RAQS or applicable portions of the State Implementation Plan (SIP). Because the project is consistent with the underlying growth assumptions, it would not be expected to conflict with or obstruct the RAQS or applicable portions of the SIP.

The latest available CalEEMod model was used to estimate air pollution emissions from construction and operation of the project, consistent with the mitigation framework measures **AQ-1** and **AQ-4** of the SYCPU FEIR. Estimated emissions from construction activities over the 9-month construction period were found to be below the daily thresholds of significance. Emissions from operation of the project, including from vehicle trips, energy use, and landscaping, were also found to be below the thresholds of significance. As such, the proposed project is not expected to result in emissions that would violate any air quality standard or contribute substantially to an existing or projected air quality violation. Because emissions from the project would not exceed daily emissions thresholds, the proposed project would not need to incorporate the best available control measures or mitigation identified in SYCPU FEIR mitigation measures **AQ-2** and **AQ-4**.

The proposed project would result in temporary emissions of dust and other pollutants during construction and long-term emissions during project operation associated with vehicle trips, energy use, and landscaping. However, as summarized above and in the Air Quality Study, these emissions would be below screening thresholds and would not result in a cumulatively considerable increase of criteria pollutants.

The Air Quality Study included an analysis of impacts on sensitive receptors, including a CO hotspots analysis, consistent with SYCPU FEIR mitigation measure **AQ-4**. As explained in the Air Quality Study, traffic generated by the proposed project and maximum daily CO emissions from operation of the proposed project are not expected to be at a level that would cause a CO hotspot. Furthermore, due to the temporary nature of the project's construction phase, and because the project would not generate a significant amount of diesel emissions from construction equipment or vehicles in any single location, the project

is not expected to result in a significant health risk from diesel particulate matter emissions. The proposed project would have a less than significant impact on sensitive receptors.

SYCPU FIER mitigation measure **AQ-6** stipulates that a health risk assessment shall be prepared, prior to the issuance of the building permit, for any facility within 500 feet of the three major freeways in the area (I-5, I-805, and SR-905). The proposed project site is located approximately 800 feet from the nearest freeway, I-5. As such, the proposed project is not required to prepare a health risk assessment.

Operation of the proposed project would involve commercial operations that have not been identified as typical sources of odor complaints. Construction associated with the proposed project could result in minor amounts of odor compounds associated with diesel heavy equipment exhaust; however, such impacts are expected to be minimal and less than significant.

The project does not propose the construction of street lighting. As such, SYCPU FEIR mitigation framework measure **AQ-5** would not apply to the project.

Consistent with SYCPU FEIR mitigation measure **AQ-3**, the project would submit a traffic control plan prior to the issuance of a grading permit.

As described above, the proposed project would not result in new significant air pollution impacts from construction and / or operation.

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 a new significant impact, nor would it result in a substantial increase in the severity of impacts from that described in the EIR.

Greenhouse Gas Emissions

FEIR

To estimate the potential greenhouse gas (GHG) emissions from implementation of the SYCPU, the SYCPU FEIR estimated GHG emissions from construction of new development anticipated to occur from buildout using CalEEMod. Construction GHG emissions were amortized over an estimated 30-year life-of-the-project time frame. Operational GHG emissions from vehicle trips, energy use, area sources, water and wastewater, and solid waste were estimated under plan buildout using CalEEMod, and compared to operational emissions under the 1990 San Ysidro Community Plan. The SYCPU FEIR determined that, although implementation of the SYCPU would result in an increase in GHG emissions compared to the existing condition, a reduction in GHG emissions would occur when compared with the 1990 San Ysidro Community Plan. Thus, impacts were determined to be less than significant, and no mitigation measures were required.

According to the SYCPU FEIR, implementation of the City's Climate Action Plan (CAP) (2015) will result in Citywide GHG reductions consistent with the City's proportionate share of statewide GHG emissions targets. The CAP assumes future population and economic growth based on community plans that were in effect at the time the CAP was being developed. Because the SYCPU would result in a reduction in GHG emissions at buildout compared to GHG emissions at buildout under the 1990 San Ysidro Community Plan, the SYCPU would ensure that the assumptions that went into the CAP would not be significantly altered and therefore that implementation of the CAP would still result in the Citywide reductions identified in the CAP. Therefore, potential impacts related to GHG emissions from implementation of the SYCPU would be less than significant, as the GHG emissions from the

SYCPU would not be greater than those assumed for the community planning area in the CAP's GHG Inventory. No mitigation was required.

The SYCPU FEIR found that the SYCPU was consistent with the CARB Scoping Plan because development under the SYCPU would be required to include all mandatory green building measures under the CALGreen Code (Part 11 of the Title 24 Building Standards Code). The SYCPU was found to be consistent with San Diego Forward: The Regional Plan because it supports multi-modal transportation, and walkable communities. The SYCPU was found to be consistent with the General Plan because it incorporates goals and policies intended to support the General Plan policies related to GHG emissions, including solar energy systems, multi-modal transportation, and tree planting. The SYCPU was found to be consistent with and to implement the City of San Diego CAP, including water conservation, solar energy, clustering residential development near transit, and ongoing updates if necessary to reflect more aggressive strategies. For these reasons, the SYCPU FEIR determined the SYCPU would not be inconsistent with plans adopted to reduce GHG emissions and no mitigation was required.

Proposed Project

A City of San Diego CAP Consistency Checklist was completed for the proposed project in October 2017 (Harris & Associates 2017b). As explained in the CAP Consistency Checklist, the proposed project would be consistent with land use and zoning designations, and would therefore be consistent with the growth projections used in the development of the CAP. The project would incorporate GHG reduction strategies, consistent with the CAP Consistency Checklist. Plumbing fixtures and fittings would meet low-flow and green building standards. The project would provide two parking spaces that are equipped with a cabinet, box, or enclosure that links the spaces with electrical service. One of those spaces would have the necessary electric vehicle supply equipment installed to provide active electric vehicle charging ready for use. The project would include three short-term bicycle parking spaces and three long-term bicycle parking spaces. The long-term bicycle parking spaces would consist of secure bike lockers. The project would include one shower stall/changing facility and two two-tier personal effects lockers. The project would include five spaces for low-emitting, fuel-efficient vehicles and five spaces for carpool/vanpool vehicles, a combined 10 parking spaces for low-emitting, fuel-efficient, and carpool/vanpool vehicles. The project's consistency with the City of San Diego CAP, as demonstrated through the CAP Consistency checklist, shows that the proposed project would have a less than significant impact related to direct and indirect emissions of GHG.

As described in the CAP Checklist Introduction, the CAP outlines actions the City will undertake to achieve its proportional share of State GHG targets. Because the proposed project is consistent with the CAP Checklist, it is also considered consistent with State policies to reduce GHG. Therefore, impacts related to consistency with adopted plans, policies, and regulations to reduce GHG emissions would be less than significant.

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 a new significant impact, nor would it result in a substantial increase in the severity of impacts from that described in the EIR.

Noise

FEIR

Regarding excessive noise levels, the SYCPU FEIR found that enforcement of noise limits imposed by the City's Noise Ordinance would avoid significant impacts on future development from stationary noise sources. Traffic increases would result in noise levels over community thresholds near major roadways, potentially causing a significant impact on any existing or future residential development that would be unable to achieve interior noise levels of less than 45 A-weighted decibels (dBA). The SYCPU FEIR identified mitigation framework measure **NOI-1** to require a site-specific acoustical analysis for new development where noise levels exceed the City's noise exposure compatibility thresholds. With mitigation and compliance with existing noise control laws, the SYCPU FIER determined impacts related to excessive noise levels would be less than significant.

The SYCPU FEIR found that the future noise environment would be dominated by highway traffic noise. There would be no significant impacts with respect to traffic noise on local streets, exclusive of freeway noise, within the SYCPU area, and no mitigation would be required.

The SYCPU FEIR determined future development within Federal Transit Authority (FTA) screening distances (i.e. distances of 600, 200 or 120 feet, depending on the sensitivity of the land use type) of the existing Trolley and freight lines could potentially be exposed to significant levels of groundborne vibration. Mitigation measure **NOI-2** requires a site-specific vibration study be prepared for proposed land uses within the FTA screening distances, and that recommended measures be implemented to ensure vibration impacts meet the FTA criteria. Implementation of Mitigation Measure **NOI-2** would reduce impacts related to vibration to less than significant.

The SYCPU FEIR determined temporary construction noise impacts associated with equipment and activities would be less than significant and not require mitigation because construction noise is regulated by the City through enforcement of San Diego Municipal Code. Furthermore, the City imposes conditions for approval of building or grading permits that address construction noise.

Finally, the SYCPU FEIR determined that the entire SYCPU area is not affected by aircraft operation noise in excess of 60 CNEL (community noise equivalent level) and that future development pursuant to the SYCPU would not be significantly impacted by nearby airport operations. No mitigation was found to be required to address aircraft operation noise.

Proposed Project

The proposed project site is located within the 60 CNEL transportation noise contour under the future buildout of the SYCPU. This City of San Diego General Plan Land Use / Noise Compatibility Guidelines stipulate that commercial services are compatible with exterior noise exposure levels of up to 65 dBA CNEL. Therefore, the proposed project is not expected to result in a significant impact to noise-sensitive land uses. Mitigation measure **NOI-1** would not apply.

According to the SYCPU FEIR, traffic from buildout of the SYCPU on the major roadway adjacent to the proposed project site, Camino De La Plaza from Willow Road to the I-5 southbound ramp, would increase the noise level 2.8 dBA CNEL to 58.8 dBA CNEL at a distance of 100 feet from the roadway. Thus, the increase in noise levels from traffic associated with SYCPU buildout would not have a significant noise impact on the proposed

project. Furthermore, the proposed project is consistent with the SYCPU; therefore, traffic associated with the project itself is not expected to add a significant amount of traffic noise to the surrounding area, than as stated in the SYCPU FEIR.

The proposed project site is located approximately 2,000 feet from the Trolley and freight lines. Therefore, vibration impacts are expected to be less than significant and mitigation measure **NOI-2** would not apply.

Construction of the proposed project would last approximately 9 months. The existing onsite building would be demolished. Construction would involve adding a left turn pocket to Camino De La Plaza, in addition to constructing the proposed parking garage and commercial space. Heavy equipment that could be used onsite for some or all of the demolition, grading and site preparation phases includes standard equipment such as dozers, graders, tractors, loaders, backhoes, dump trucks, and concrete saws. The construction and paving phases may involve use of cement mixers, cranes, forklifts, tractors, loaders, backhoes, rollers, pavers, dump trucks, and air compressors. The proposed project would be required to comply with the City of San Diego Municipal Code Section 59.5.0404. Standard daytime operating hours would be used (7am-7pm). Pursuant to Section 59.5.0404, it shall be unlawful for any person, between the hours of 7:00 PM of any day and 7:00 AM of the following day, or on legal holidays as specified in Section 21.04 of the San Diego Municipal Code, with exception of Columbus Day, Washington's Birthday, or on Sunday's, to erect, construct, demolish, excavate for, alter, or repair any building or structure in such a manner as to create disturbing, excessive or offensive noise unless a permit has been applied for and granted beforehand by the Noise Abatement and Control Administrator. Noise-generating construction activities could take place on Saturdays, Sundays, and holidays. Nighttime and late evening construction during non-peak traffic hours would be used due to the traffic demands during the day at the transit center located just to the south on Virginia Avenue. In accordance with San Diego Municipal Code Section 59.5.0404, the restricted hours of construction include hours between 7:00pm and 7:00am of the following day, Sundays, and on legal holidays. However, as specified in San Diego Municipal Code Section 21.04, a permit from the City Noise Abatement and Control Administrator may be obtained to allow for construction activities to continue during these times. There are no noise sensitive receptors near the site as it is surrounded by commercial uses and the transit center. Construction activities would be limited to onsite work during the November/December shopping period due to agreements with the outlet centers. As such, the project is expected to have less than significant impacts related to temporary construction noise and no mitigation measures are required. Therefore, consistent with the SYCPU FEIR, the noise impacts from construction would be less than significant.

The proposed project site, which is within the SYCPU plan area, is not within an area affected by aircraft noise in excess of 60 dBA CNEL. Therefore, there would be no impacts related to aircraft noise.

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 a new significant impact, nor would it result in a substantial increase in the severity of impacts from that described in the EIR.

Biological Resources

FEIR

Sensitive Species

The SYCPU FEIR identified potentially significant impacts to sensitive plants and wildlife species through the implementation of the SYCPU in the undeveloped portions, directly through the loss of habitat or indirectly by placing development adjacent to the MHPA. Although implementation of the SYCPU has the potential to result in significant direct and indirect impacts to sensitive plant and animal species, specific projects would be required to implement the mitigation framework measures identified in the FEIR. Mitigation framework measures **BIO-1** through **BIO-9** requiring site specific biological analysis of potential impacts to biological resources, and specific species recommendations for project-specific mitigation would reduce significant project-level biological resource impacts to less than significant.

Sensitive Habitats/Wetlands

The SYCPU FEIR concluded that implementation of the SYCPU has the potential to impact wetland communities and Tier I, II, and IIIB upland habitats¹. These impacts could occur directly through removal or indirectly by placing development adjacent to sensitive vegetation communities. Implementation of mitigation measures **BIO-10** and **BIO-11** would reduce impacts on sensitive habitat/communities from future development to less than significant.

Wildlife Movement

There are no regional wildlife corridors located within the SYCPU area; therefore, the implementation of the SYCPU would not preclude the local use of habitat by wildlife. The SYCPU FEIR concluded that the implementation of the SYCPU would have a less than significant impact.

MHPA

Potential encroachment in the MHPA area related to future development along the eastern edge of the SYCPU that exceeds the allowable amounts would require an amendment to the MHPA through a boundary line adjustment, which would require comparable habitat be placed in an MHPA to offset the loss of MHPA area resulting from development. Development could not occur until the City and Resource Agencies approved the boundary adjustment, which would reduce the potential impact on the MSCP goals to less than significant.

Future development proposals in the SYCPU area could result in edge effects to MHPA lands that degrade habitat or alter animal behavior within the preserve, which could be significant. However, MHPA adjacency issues would be addressed at the project level in accordance with the requirements of the MHPA Land Use Adjacency Guidelines. Therefore, there are anticipated to be no significant adverse edge effects to the MHPA.

Similar to other biological impacts, the SYCPU FEIR states that the potential impacts associated with the introduction of invasive species into the MHPA would be evaluated at the project level. Future projects would be required to implement the MHPA Land Use Adjacency

¹ Upland vegetation communities are divided into five tiers of sensitivity based on rarity and ecological importance; the first tier includes the most sensitive and the fifth the least.

Guidelines to exclude exotic plant/invasive species from landscape plans and to include an appropriate mix of native species. Therefore, such projects in the SYCPU area would not be expected to introduce invasive plant species into natural open space. Impacts would be less than significant at the program level.

Proposed Project

The proposed project is located on the same parcel as the existing facility and associated 54-space parking lot. The site is disturbed and does not contain sensitive habitat nor does it support sensitive plant or wildlife species. The proposed project is not located in or adjacent to any MHPA lands. Therefore, the proposed project would not result in significant impacts to biological resources.

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 a new significant impact, nor would it result in a substantial increase in the severity of impacts from that described in the EIR.

Historical Resources

FEIR

Historical or Archaeological

The San Ysidro community includes known historical and archaeological resources. The SYCPU FEIR concluded that future development pursuant to the SYCPU could have a significant impact on important historical or archaeological resources as well as subsurface cultural resources, which have not been identified by previous studies. Implementation of Mitigation framework measure **HIST-1**, combined with SYCPU policies promoting the identification and preservation of significant resources and compliance with CEQA and Public Resources Code Section 21080.3.1 requiring tribal consultation, would reduce impacts to archaeological or tribal cultural resources to less than significant for future development. Implementation of Mitigation Measure **HIST-2** would reduce impacts to historic buildings, structures, and objects; however, impacts to historic buildings, structures, and objects could not be fully mitigated by Mitigation Measure **HIST-2** because the ability of this measure to adequately protect significant historic structures could not be assured at the program level. Thus, potential significant impacts to important historical resources were considered significant and unavoidable.

Religious or Sacred Sites

Given the presence of known sacred lands within the community, the SYCPU FEIR concluded that future development pursuant to the SYCPU could have a significant impact on religious or sacred sites. Implementation of Mitigation Measure **HIST-1**, combined with SYCPU policies promoting the identification and preservation of significant resources and compliance with CEQA and Public Resources Code Section 21080.3.1 requiring tribal consultation, would reduce impacts to less than significant.

Human Remains

The SYCPU FEIR concluded that given the possibility of encountering subsurface human remains, any impact to human remains during future development pursuant to the SYCPU would be considered significant. Implementation of Mitigation Measures **HIST-1**, combined with SYCPU policies on promoting the identification and preservation of significant resources would reduce impacts to less than significant.

Proposed Project

Historical Resources

Built Environment

The project site consists of the existing 2,400 square foot facility that was constructed in 2001. Since the existing structure is not 45 years old or older, it does not require review as a historical resource. Therefore, the project would not result in impacts to historical resources.

Archaeological Resources

Based on review of the City of San Diego's Historical Resources Sensitivity Maps, the project site is located in a high sensitivity area for archaeological resources. On September 22, 2015, qualified City staff (QCS) conducted a California Historic Resources Inventory (CHRIS) database search, and no recorded sites were identified in the project boundary. QCS also indicated the site has been very disturbed by past development, and determined no further archaeological evaluation or monitoring would be required. Therefore, the project would not result in impacts to archaeological resources.

Assembly Bill 52 (Tribal Cultural Resources)

Pursuant to the requirements of AB 52 (CEQA Statute § 21080.3.1), on June 8, 2017, City staff sent notification to Tribal Representatives of the Iipay and Jamul Indian Tribes. Subsequently, on July 14, 2017, City staff met with Tribal Representatives for consultation on this project, and there were no further concerns to tribal cultural resources, mitigation was not required. Consultation was closed for this project. Therefore, the project would not result in impacts to cultural resources.

Human Remains

No formal cemeteries or human remains are known to exist on site or in the vicinity. In the event that human remains are discovered during ground disturbing-activities associated with redevelopment of the project site, work shall halt in the area and the procedures set forth in the California Public Resources Code (Section 50987.98) and State Health and Safety Code (Section 7050.5), and in the federal, state, and local regulations as described in the SYCPU shall be undertaken.

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 a new significant impact, nor would it result in a substantial increase in the severity of impacts from that described in the EIR.

Visual Effects and Neighborhood Character

FEIR

Public Views

As discussed in the SYCPU FEIR, no scenic roadways, scenic vistas, or scenic corridors are identified within the SYCPU area. Although not designated, the SYCPU area includes the Dairy Mart Ponds, Tijuana River Valley and eastern hillsides, which are considered the area's major visual resources. The intent of the SYCPU is to improve public views within the proposed SYCPU area. Additionally, various elements of the proposed SYCPU contain policies to avoid or reduce impacts to public views within the community as future development

projects are proposed. Therefore, impacts related to view blockage would be less than significant.

Neighborhood Character

As discussed in the SYCPU FEIR, the SYCPU has been divided into neighborhood districts. The SYCPU contains specific policies to guide development within these neighborhood areas based on the characteristics of the built environment, and the existing and desired land use pattern, which address neighborhood character. The land use and development design guidelines and policies of the SYCPU would ensure that development would not negatively affect the neighborhood character of the proposed district. Therefore, the SYCPU FEIR identifies less than significant impacts associated with changes to the visual character of the SYCPU area.

Landform Alteration

The SYCPU FEIR determined that future development implemented under the SYCPU would not result in substantial landform alteration. Most of the SYCPU area is generally flat, with level terrain in the southern extent of the SYCPU area and level to gently sloping areas in the central and northern portions of the SYCPU area where the community is urbanized. Hillside areas are located on the eastern portion of the SYCPU. Future development in the hillsides would be governed by a Specific Plan process and would be required to comply with landform grading guidelines contained in the City Grading Regulation, ESL Regulations, and Steep Hillside Guidelines of the Land Development Code. Therefore, impacts would be less than significant at the program level.

Proposed Project

Public Views

The project site consists of the existing facility and associated 54-space parking lot. Public views in the area surrounding the proposed project site include views for motorists and pedestrians travelling along Camino De La Plaza and Virginia Avenue. However, there are no designated scenic roadways, scenic corridors, or scenic vistas in the SYCPU area. The project would require the demolition of the existing building and parking lot. The site is relatively flat. The retail space on the first level would be covered with a colored plaster and aluminum storefront that is consistent with the building materials in the area. The exterior of the parking levels would be screened from Camino De La Plaza and Virginia Avenue with a polyvinyl chloride (PVC) fabric mural and metal screen. All open parking spaces on the roof deck are proposed to have horizontal PVC fabric screening on 50% of each parking space. The project would not substantially alter or block public views from designated open space areas, roads, or parks or to significant visual landmarks or scenic vistas.

Neighborhood Character

The SYCPU FEIR identifies the proposed project site as being within the Commercial District. This area of the SYCPU was established to serve an area beyond the community with a variety of uses including commercial service, civic, retail, office and limited industrial uses. The proposed project complies with the applicable Urban Design policies of the SYCPU Commercial District as follows:

Urban Design Policy	Project Consistency
Tailor building height and scale to be sensitive to surrounding residential and commercial uses	Consistent. The proposed parking structure is compatible in scale with the heights used in the Las Americas Outlet Centers located less than 1/10th of a mile to the west.
Strengthen neighborhood identity and connectivity with pedestrian promenades.	Consistent. The project provides a pedestrian promenade along the public streets with a protected first floor indentation area of six feet on the Virginia Avenue side. This promenade will work in conjunction with the public sidewalks adjacent to the streets.
Promote enhancements to commercial areas including façade improvements, enriched streetscapes and landscaping, unified signage programs, improved pedestrian access, and infill pad development.	Consistent. The project will have a unique facade including a large international graphic. A pedestrian promenade along with enhanced landscaping will tie in with the streetscapes along Virginia Avenue and Camino De La Plaza.
Design parking and loading areas as an integral part of the total project design, locating them so that the visual impacts of these areas on adjacent development and the public right-of-way are minimized and screening them attractively using a combination of fencing and landscaping.	Consistent. All parking and loading areas, including the Mexican Insurance drive-through, will be contained within the parking structure. The exterior of the parking levels will be screened from Camino De La Plaza and Virginia Avenue with PVC fabric, mural, and metal screen. All open parking spaces on the roof deck will have horizontal PVC fabric screening 50% of the total spaces. Only one entrance will be provided on Camino De La Plaza.

The proposed project would include deviations to the regulations of the Land Development Code pursuant to Section 126.0602(b)-(c). First, the project would include a building height of 70 feet, instead of the 60-foot maximum building height guideline, in order to maximize parking, which is a goal outlined in the SYCPU Urban Design Element. The height and scale of the proposed parking structure would be compatible with adjacent uses. Furthermore, the project would have architectural features that would reduce the visual height impact to be compatible with the surrounding commercial uses. The proposed project would have a large international-themed graphic and comprehensive sign plan, which are intended to enhance the façade and enrich the streetscape. The structure would adjoin a ten-foot wide non-buildable lot on the east side, adjacent to Virginia Avenue and the first floor would be pulled back six feet under the building. These elements would further lessen the impact of the building height deviation, especially for pedestrian access. A pedestrian sidewalk and landscaping would connect with the streetscapes along Virginia Avenue and Camino De La

Plaza. These features are intended to create a more open and comparative scale for vehicular and pedestrian traffic going to and from the Land Port of Entry and neighboring commercial uses. These elements would combine to minimize any impacts resulting from the height deviation.

The proposed project would also include deviations to the side yard and rear setback requirements. However, the setback deviations are minimal and would not create any adverse impacts. The adjoining property to the west has commercial parking spaces that would not be changed. The adjacent property along Virginia Avenue is a ten-foot wide, non-buildable landscaped parcel that would not be impacted by the proposed project setbacks. In addition, along Virginia Avenue, the first floor would be set back an additional six feet, further minimizing any impact from the setback deviation. The rear yard would adjoin the private drive aisle for the outlet centers that are adjacent to the proposed project site. The 3 feet minimum rear setback would only be necessary at the westerly point of the proposed project, with the majority of the rear setback being 9 feet for the proposed parking structure. The adjacent drive aisle would not be impacted by the rear yard setback deviation.

Overall, the proposed project would complete and conform to the majority of the land use and development design guidelines for the SYCPU Commercial District. Therefore, the proposed project would comply with the development design guidelines for the SYCPU Commercial District with approved deviations and not result in any new impacts to neighborhood character.

Landform Alteration

The proposed project site consists of the existing facility and associated 54-space parking lot. The site is relatively flat and contains no slopes. Construction of the proposed project would not result in substantial landform alteration and no impact would occur.

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 a new significant impact, nor would it result in a substantial increase in the severity of impacts from that described in the EIR.

Human Health / Public Safety / Hazardous Materials

FEIR

Health Hazards

The SYCPU FEIR identifies 24 sites within the SYCPU that are, "considered to pose a risk for environmental contamination." Implementation of future development in the SYCPU near these sites could potentially expose people or sensitive receptors to significant health hazards related to hazardous materials. The SYCPU FEIR concludes that potential impacts related to hazardous materials and associated health hazards from implementation of the SYCPU would be avoided or reduced below a level of significance through mandatory conformance with applicable regulatory/industry standard and codes. No mitigation measures are required.

Flood Hazards

The SYCPU FEIR concluded that potential impacts related to flood hazards from implementation of the SYCPU would be less than significant, based on the following considerations: (1) most proposed SYCPU development is located outside of 100-year

floodplains; (2) all proposed SYCPU development is located outside of potential tsunami/seiche inundation areas; and (3) mandatory requirements for compliance with regulatory requirements related to development within 100-year floodplains, and dam safety and security in Mexico.

Aircraft Related Hazards

No airport or related Accident Potential Zone (APZ) is located within or adjacent to the SYCPU area. Therefore, the SYCPU concluded that the risk of aircraft-related risks to the population within the SYCPU area is low.

Emergency Response and Evacuation Plans

The San Diego Office of Homeland Security (SD-OHS) oversees emergency preparedness and response services for disaster-related measures, including administration of the City Emergency Operations Center (EOC) and alternate EOC. There are no goals or objectives in the proposed SYCPU that would interfere with or diminish the capacity of these programs and facilities to provide effective emergency response in the SYCPU or other areas. The SYCPU FEIR identifies that I-5, I-805 and SR-905 are identified as primary evacuation routes in the SYCPU area vicinity. There are no goals or objectives in the proposed SYCPU that would affect the ability of these (or other) roadways to provide emergency evacuation capacity during natural or man-made disasters. Development proposed under the SYCPU would be required to comply with applicable City emergency preparedness and response criteria or emergency evacuation plans and; therefore, impacts would be less than significant.

Wildfire Hazards

The SYCPU area includes a number of sites designated as “high-risk” for fire hazards, including undeveloped areas within native habitats located south of I-5 (Tijuana River Valley) and east of I-805, as well as several pockets of native or restored vegetation located within existing development or along freeway corridors. The SYCPU FEIR concluded that, based on required compliance with applicable State and City standards associated with fire hazards and prevention, development in these areas would result in a less than significant impact.

Proposed Project

Health Hazards

The proposed project site is not located within or adjacent to any of the 24 sites identified in the SYCPU FEIR as potentially contaminated. The project is not located on the Regional Water Quality Control Board Geotracker database for hazardous materials. The project would consist of commercial uses, which would not involve the routine transport, use, or disposal of hazardous materials. During construction activities, small amounts of hazardous materials may be present on site (such as fuels, lubricants, solvents, etc.); however, these materials would be present in small quantities and typical of those used in construction activities. These materials would be stored, handled, used, and disposed of in accordance with applicable federal, State, and local regulations and requirements, and would not create a significant hazard to the public or environment. Impacts would be less than significant and no new impact would occur.

The project requires the demolition of the existing structure and associated parking spaces. Due to the age of the building, there is a low potential for adverse impact to human health associated with inhalation of asbestos fibers and ingestion of lead-based paint. The

proposed project is required to conform to applicable regulatory/industry and code standards related to health hazards from hazardous materials; therefore, no impact would occur.

Flood, Aircraft, Wildlife Hazards, Emergency Preparation and Evacuation Plans

The proposed project is not located within a 100-year flood plain or tsunami/seiche inundation areas. The proposed project is also not located within a “high risk” area for wildfires or Accident Potential Zone (APZs). The proposed project is consistent with the goals of the SYCPU; therefore, it would not impact the City’s emergency preparation or evacuation plans, and would not impede aircraft operations. Therefore, no impact would occur.

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 a new significant impact, nor would it result in a substantial increase in the severity of impacts from that described in the EIR.

Hydrology Water Quality and Drainage

FEIR

Runoff

Development pursuant to the SYCPU has the potential to change surface runoff characteristics, including the volume of runoff, rate of runoff, and drainage patterns. An increase in the volume or rate of runoff could result in flooding or erosion. However, all development within the SYCPU area is subject to drainage and floodplain regulations in the San Diego Municipal Code, and would be required to adhere to the City’s Drainage Design Manual and Storm Water Standards Manual. Therefore, the SYCPU FEIR concluded that impacts to runoff from implementation of the SYCPU would be less than significant.

Pollutant Discharge

Future development projects pursuant to the proposed SYCPU have the potential to change pollutant discharges either from an increase in the volume of storm water runoff, or from addition of new sources of pollution. However, the SYCPU FEIR concludes that future development under the proposed SYCPU would be required to implement storm water best management practices (BMPs) into project design to address the potential for transport of pollutants of concern through either retention or filtration. The implementation of low impact development design and storm water BMPs would reduce the amount of pollutants transported from the SYCPU area to receiving waters. Thus, impacts would be less than significant.

Proposed Project

The following discussion is based on a Drainage Study and Water Quality Report prepared by Stuart Engineering in August 2015 and a Priority Development Project Storm Water Management Plan prepared by Stuart Engineering in July 2016.

Runoff

The proposed project site is currently fully developed with an existing building and drive-through, 54-space parking lot, and perimeter landscaping. Runoff from the existing facility and parking lot drains as surface flow to the south and travels as gutter flow in the private drive located south of the project site. Overflow from the perimeter landscaping drains to the adjacent sidewalk and travels as gutter flow along Camino De La Plaza to the north and

Virginia Avenue to the east. Runoff from the site travels south and enters a storm drain system near the USA/Mexico border and outlets to the Tijuana River. Currently, four underground private 36-inch diameter reinforced concrete pipes traverse through the middle of the site conveying water from an east-west oriented public channel to the east of Virginia Avenue to a recently constructed double 3x8 box culvert on an adjacent property to the southwest which outlets to the Tijuana River.

The project would include the construction of a multi-level parking structure with 13,210 square feet of retail space on the ground floor. Runoff from the rooftop would be captured by a series of roof drains that would convey runoff to a downspout that would be connected to a proposed storage system that would consist of arch-shaped chambers. Runoff from the proposed north driveway, north and northeast walkways and landscaped areas of the site would be captured by proposed trench drain systems that would also be connected to the proposed arch-shaped chamber storage system. The open-bottom arch-shaped chambers would temporarily store runoff but would also allow runoff to infiltrate into the ground. Runoff from the south and southeast property would be captured by a proposed trench drain system around the perimeter of the property and would drain to a proposed second storage system, which would also consist of arch-shaped chambers. Runoff generated from larger storm events would be conveyed via a proposed storm drain pipe that would be connected to the existing private storm drain system, which consists of four 36-inch pipes via modified cleanout systems. The modified cleanout systems would consist of modified, poured base, sewer manholes used as storm drain cleanouts.

Treated storm water from the project site would be conveyed to a pipe that would be connected to the existing private four 36-inch pipes located under the proposed building. The existing private four 36-inch pipes under the proposed building travel west and south and connect to a 3-foot high by 10-foot wide double box culvert that outlets to the Tijuana River.

The proposed project would result in a minor increase in flow compared to existing conditions (2.86 cubic feet per second (cfs) versus 2.75 cfs). This negligible increase would be retained on-site. As such, there would be no additional change in absorption rates, drainage patterns, or the rate of surface runoff as a result of implementation of the proposed project. Potential impacts would not rise to the level of significance due to the project features described above.

Pollutant Discharge/Water Quality

The project site is currently fully developed with an existing building and drive-through, 54-space parking lot, and perimeter landscaping. During project construction, there is the potential for short-term impacts on surface water quality through activities such as demolition, clearing and grading, stockpiling of soils and materials, concrete pouring, painting, and asphalt paving. The proposed project would be required to implement the BMPs for the entire construction site including the haul roads and staging areas needed to support the construction to control urban runoff. Erosion control plans with specific notes and locations of construction BMPs would be included on the final construction documents.

During operation of the proposed project, there would be an increase in urban pollutant sources and urban runoff, which could cause water quality degradation. Urban runoff typically consists of oil and grease, pesticides, sediments, nutrients, heavy metals, organic compounds, and oxygen demanding substances. As discussed above, the BMPs would collect and treat runoff before it leaves the project site. With the incorporation of the design

elements into the proposed project and the use of BMP's during construction and post construction, pollution to downstream water bodies would be minimized to the maximum extent practical. There would be no new significant short term or long-term water quality impacts as a result of implementation of the proposed project.

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 a new significant impact, nor would it result in a substantial increase in the severity of impacts from that described in the EIR.

Population and Housing

FEIR

The SYCPU FEIR determined that if existing housing were to be demolished for future development that the displacement of population or housing stock would occur. However, under the SYCPU, any displacement would be temporary in nature. SANDAG population projections for the SYCPU area indicate that the population will increase over time, regardless of whether or not the SYCPU is implemented. The proposed SYCPU includes a number of goals and policies to manage and accommodate this growth. To accommodate expected population growth, under the SYCPU some existing industrial and commercial areas would be redesignated to permit residential uses, and would increase the density of certain residential areas in accordance with City policies, goals, and regulations. No currently designated residential areas would be redesignated or rezoned to non-residential uses as part of the implementation of the SYCPU. Therefore, impacts related to population and housing would be less than significant.

Proposed Project

The proposed project would demolish the existing facility and associated 54-space parking lot, and replace it with a multi-story parking structure over 13,210 square feet of retail space on the ground level. It would not result in the demolition or displacement of existing residential uses or conversion of land planned for residential use to non-residential use. Therefore, no new impact to population and housing would occur. The new development at this parcel would provide the community with additional parking spaces and commercial space in accordance with the objectives of the SYCPU, and no new population impacts would result.

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 a new significant impact, nor would it result in a substantial increase in the severity of impacts from that described in the EIR.

Public Services

FEIR

Police and Fire Protection Services

The Southern Division of the San Diego Police Department (SDPD) provides police protection services within the SYCPU area. Currently, the SDPD provides adequate service to the SYCPU area. Future increase in population could result in a future demand for officers. However, the SDPD does not plan future operational needs based on individual projects. Therefore, implementation of the SYCPU would not result in construction of new police facilities, which could result in physical changes to the environment. Consequently,

the SYCPU FEIR concluded that impacts related to police services would be less than significant.

Three San Diego Fire Department Stations, Fire Station 29, Fire Station 6 and Fire Station 30 service the San Ysidro area P. The SYCPU FEIR concluded that adequate fire protection services are expected to be available to meet the needs of the future development in accordance with the implementation of the SYCPU. Therefore, no new construction of fire facilities would occur and impacts would be less than significant.

Libraries

A new library is planned to replace the existing San Ysidro Public Library. With the construction of the new library, combined with the existing library in Otay Mesa, the SYCPU FEIR concluded that adequate library service would exist at buildout under the SYCPU. Therefore, implementation of the SYCPU would not result in construction of new library facilities, which could result in physical changes to the environment. Consequently, the SYCPU FEIR concluded that impacts related to library facilities would be less than significant.

Parks

The SYCPU FEIR identifies the need for and/or provision of new park facilities to meet the demand at buildout of the SYCPU. If new parkland or recreational facilities are required as part of a development project, potential environmental effects would be analyzed on a case-by-case basis to ensure that population-based parks are provided for, either through development of park and recreation facilities or payment of the Development Impact Fees or other appropriate fees. If new parkland or recreational facilities were proposed as part of a development project, potential environmental effects would be analyzed at that time. Based on these considerations, the SYCPU FEIR determined that a less than significant, program-level impact related to the provision of parks would occur.

Schools

The increase in population associated with development pursuant to the SYCPU would generate additional school-aged children attending schools that serve the SYCPU area. However, based on the school enrollment and capacity data obtained from the San Ysidro School District (SYSD), South Bay Union School District (SBUSD) and the Sweetwater Union High School District (SUHSD), school aged children associated with development in accordance with the SYCPU would not exceed the capacity and school sizing goals for elementary, middle, and high school. Thus, no new schools are anticipated to be necessary to accommodate the buildout of the SYCPU area.

Proposed Project

Police, Fire, Libraries, Parks and Schools

The project would include demolition of the existing 2,400 square foot building and construction of a multi-story parking structure over 13,210 square feet of retail space on the ground floor. The proposed project site is designated as Regional Commercial in the SYCPU; project implementation is consistent with the community plan and would not require the expansion or construction of new public facilities. Therefore, no impacts would occur.

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 a new significant impact,

nor would it result in a substantial increase in the severity of impacts from that described in the EIR.

Public Utilities

FEIR

Water Supply

A Water Supply Assessment (WSA) was prepared for the SYCPU area. It concluded that there is sufficient water supply to serve existing and projected demands of the SYCPU. Therefore, the SYCPU FEIR concluded that implementation of the SYCPU would have a less than significant impact on water supply.

Utilities

The SYCPU acknowledges that water and sewer system improvements have been ongoing and addresses the need to provide systematic improvements and gradual replacement of aging water, sewer, and storm water facilities throughout the community. As individual development projects are initiated under the SYCPU, localized improvements would be required as part of the project design and review. Therefore, the SYCPU FEIR concluded that impacts to utilities would be less than significant at the program level.

Solid Waste and Recycling

The SYCPU FEIR concluded that it is anticipated that implementation of the SYCPU would increase the solid waste management needs of future residents and businesses. However, due to the programmatic nature of the SYCPU, the size, location, and type of specific developments are not known at this time. Any future development projects that would result from implementation of the SYCPU must comply with the City of San Diego Municipal Code. In addition, any future discretionary development exceeding the 60-ton thresholds must prepare a waste management plan targeting 75 percent waste reduction. Therefore, impacts on solid waste facilities would be less than significant.

Proposed Project

Water Supply

The proposed project is consistent with SYCPU land use designations for the site. As such, water supply demand for the project site would have been projected and included in the overall Water Supply Assessment prepared to support the SYCPU. The project did not meet the threshold for preparation of a project-specific WSA. Therefore, no new impact would occur.

Utilities

The proposed project includes the construction of 6-inch fire service, 2-inch irrigation service and 6-inch sewer lateral in Camino De La Plaza. No improvements to the existing storm drain facilities is required. Treated storm water from the project site would be conveyed through a pipe that would be connected to the existing private four 36-inch pipe located under the proposed building. The existing private four, 36-inch pipes under the proposed building would travel west and south and connect to an existing 3-foot high by 10-foot wide double box culvert that outlets to the Tijuana River. The need for localized improvements based on future projects was discussed in the SYCPU FEIR. The construction of the new 6-inch and 2-inch irrigation line, and 6-inch sewer lateral will occur within Camino De La Plaza and were included in the design and reviewed by City staff for the proposed project. Therefore, no new significant impact would occur.

Solid Waste and Recycling

The site is currently developed with an existing facility that generates solid waste. A Waste Management Plan (Harris & Associates 2018) was prepared for the proposed project. The existing facility generates approximately 6.7 tons of waste per year. The proposed project is anticipated to generate 615 tons during demolition, grading, and construction of the 5-level, 132,186 square foot parking structure over associated retail space, and approximately 20 tons annually during operations. The following measures are incorporated to reduce waste generation, including:

- Grading balance of cut and fill for no export of materials from the site
- Reuse of the bullet-resistant glass and security man door from the existing building
- Recycling of demolition and construction materials through source separation techniques
- Providing recycling containers for tenants
- Recycling of landscape debris
- Incorporation of office management practices to reduce generated waste including double sided copiers, electronic billing and receipts, use of rechargeable batteries, use of permanent utensils in break room, and reuse of packing materials.

The proposed project would generate less than the City's threshold of 60 tons of solid waste per year; therefore, it would not result in a new impact not addressed in the SYCPU FEIR.

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 a new significant impact, nor would it result in a substantial increase in the severity of impacts from that described in the EIR.

Energy Conservation

FEIR

Construction

The Energy Conservation section of the SYCPU FEIR determined that grading and construction activities would consume energy through the operation of heavy off-road equipment, trucks and worker traffic. There are no conditions in the SYCPU area that would require non-standard equipment or construction practices that would increase fuel-energy consumption above typical rates. Therefore, development pursuant to the SYCPU would not result in the use of excessive amounts of fuel or other forms of energy during the construction of future projects under the SYCPU.

Long Term Operation

Energy would also be consumed to provide operational lighting, heating, cooling, and transportation for future development. Long-term, the SYCPU FEIR found that, as would be expected, buildout of the SYCPU would result in more natural gas and electricity consumption when compared to the existing condition. Future development would comply with the current California Energy code (Title 24 Building Energy Standards of the California Public Resources Code). Additionally, rebate and incentive programs that promote the installation and use of energy efficient plug-in appliances and lighting would be available. Future development would comply with the SYCPU Conservation Element, which contains a list of Sustainable Development Policies that focus on designing new development to have a climate, energy efficient, and environmentally oriented site design. Furthermore, future projects would be subject to review for measures that would further reduce energy

consumption in conformance with existing regulations. The SYCPU Mobility Element contains policies that would reduce vehicle miles travelled and associated fuel consumption. These include policies to improve neighborhood walkability design, expand public transit, and increase bicycle infrastructure and bike-riding incentives.

Short-term construction and long-term operational energy impacts under the SYCPU were found to be less than significant.

Proposed Project

Construction of the proposed project is not expected to require non-standard equipment or construction practices that would increase fuel-energy consumption above typical rates. Therefore, similar to the findings of the SYCPU FEIR, construction of the proposed project would not result in excessive amounts of energy use.

The project would comply with the California energy code. In addition, it would implement measures from the City of San Diego CAP Compliance Checklist, including:

- Plumbing fixtures and fittings that do not exceed the maximum flow rate specified in Table A5.303.2.3.1 (voluntary measures) of the California Green Building Standards Code; and, appliances and fixtures for commercial application that meet the provisions of Section A5.303.3 (voluntary measures) of the California Green Building Standards Code (see *CAP Consistency Checklist*, Harris & Associates 2017b).
- Two parking spaces would be provided that are equipped with a cabinet, box, or enclosure that links the spaces with electrical service. One of those spaces would have the necessary electric vehicle supply equipment installed to provide active electric vehicle charging ready for use.
- Three short-term bicycle parking spaces and three long-term bicycle parking spaces would be provided. The long-term bicycle parking spaces would consist of secure bike lockers.
- The project would include one shower stall/changing facility and two two-tier personal effects lockers.
- The project would include five parking spaces for low-emitting, fuel-efficient vehicles and five spaces for carpool/vanpool vehicles.

Energy conservation measures required by applicable energy conservation regulations (e.g., the CALGreen Building Code) and the CAP measures listed above would reduce energy consumption. Thus, energy impacts would be less than significant.

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 a new significant impact, nor would it result in a substantial increase in the severity of impacts from that described in the EIR.

Geology and Soils

FEIR

Geological Hazards

The SYCPU FEIR identifies portions of the SYCPU as moderate to high geotechnical and relative risk areas. The eastern area of the SYCPU is highly susceptible to landslides with the presence of expansive soils. The southern and western areas have high potential for liquefaction. In addition, the areas containing slopes contain potential hazards related to erosion and sediment transport. The SYCPU FEIR indicates that groundwater, tsunamis,

seiches, and subsidence were found not to pose substantial geological constraints to future development. The SCYPU FEIR identifies potentially significant impacts associated with geological hazards. These potentially significant impacts would be mitigated through implementation of mitigation framework measure **GEO-1**, which requires the preparation of a Geotechnical Investigation in the areas identified with geologic hazard categories 21 or 22, in the SYCPU FEIR. Implementation of Mitigation Measure **GEO-1** was found to reduce impacts to less than significant.

Erosion and Sedimentation

The SYCPU FEIR concluded that potential hazards related to erosion and sedimentation within the SYCPU area are generally low in level areas and higher on steeper slopes. Erosion and sedimentation hazards can be increased through development-related activities such as excavation/grading and removal of stabilizing structures and vegetation. The SYCPU FEIR concluded that erosion and sedimentation are not considered to be significant long-term concerns in the SYCPU area, as developed areas would be stabilized through installation of structures/hardscape and landscaping. Potential impacts related to erosion and sedimentation from implementation of the SYCPU would be avoided or reduced below a level of significance through mandatory conformance with applicable regulatory/industry standard and codes.

Geological Stability

The SYCPU FEIR identified that expansive soils with moderate to very high expansion potential occur in the eastern portions of the SYCPU area that are underlain by the Otay Formation. In addition, soils associated with the Bay Point Formation in the central and northwestern portions of the SYCPU area may locally exhibit low to medium potential for expansion. Potential impacts related to geologic instability from implementation of the SYCPU would be avoided or reduced below a level of significance through mandatory conformance with applicable regulatory/industry standard and codes, including the International Building Code, California Building Code, and pertinent City criteria. Furthermore, potential impacts related to subsidence and collapse from implementation of the SYCPU would be less than significant.

Proposed Project

The project is not within an area identified with geologic hazard categories 21 or 22. As part of the proposed development, Christian Wheeler Engineering prepared a Geotechnical Investigation Report in April 2015. The project site is located in the Coastal Plains Physiographic Province of San Diego County and is underlain by alluvium and artificial fill. The site is located in landslide susceptibility Area 2. Land within Area 2 is considered to be “marginally susceptible” to landslide. Based on the absence of significant slopes on or within the vicinity of the subject site, the potential for slope failures can be considered negligible. The project site is considered susceptible to liquefaction. However, based on the analysis conducted in the Geotechnical Investigation Report the potential is low. In addition, the potential for lateral spreading is low.

Based on the geotechnical investigation prepared for the proposed project, it was concluded that the proposed project site is suitable for the proposed construction, provided the recommendations outlined in the report are followed. Based on the results of the investigation, the most significant geotechnical condition to affect the proposed construction is the likely need to use ground improvement techniques or deep foundations in order to support the relatively heavy loads of the proposed parking structure. Implementation of the

comprehensive geotechnical evaluation and other design and construction practices, as refined through a project specific report at the time of building permit application, would reduce potential impacts related to geology/soils to less than significant.

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 a new significant impact, nor would it result in a substantial increase in the severity of impacts from that described in the EIR.

Paleontological Resources

FEIR

According to the SYCPU FEIR, the SYCPU area includes a number of formations with moderate (Lindavista Formation) or high (Bay Point, San Diego and Otay formations) potential for the occurrence of sensitive paleontological resources. While portions of the SYCPU area encompassing these formations have been previously disturbed and developed with existing urban uses, grading associated with future development activities could potentially expose undisturbed formational areas. The SYCPU FEIR found that significant impacts could result from implementation of the SYCPU, but would be mitigated through the implementation of a project-level analysis and construction monitoring (Mitigation Measure **PALEO-1**).

Proposed Project

The San Diego Formation underlies the alluvium at the depth at the site of the proposed project. The San Diego Formation is considered to have a high potential for producing significant paleontological resources. The proposed project would result in the excavation of 30 cubic yards at a depth of cut of 2 feet, 30 cubic yards of fill at a maximum depth of 0.3 feet. According to the mitigation framework measures of the SYCPU, if a project excavates 1,000 cubic yards at a depth of ten feet or greater in high sensitivity areas, the project would result in a significant impact on paleontological resources. Therefore, because the proposed project does not meet the mitigation framework measures, **PALEO-1** for impacts to paleontological resources, no impact would occur and mitigation will not be required. As such, project-specific impacts would be less than significant.

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 a new significant impact, nor would it result in a substantial increase in the severity of impacts from that described in the EIR.

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

No project-specific mitigation measures are required for this project.

VII. SIGNIFICANT UNMITIGATED IMPACTS

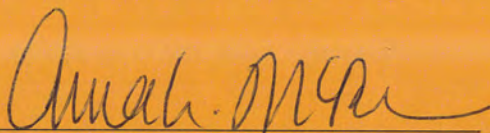
The **San Ysidro Community Plan Update EIR No. 310690/SCH No. 2015111012** indicated that direct significant impacts to the following issues would be substantially lessened or avoided if all the proposed mitigation measures recommended in the EIR were implemented: Noise, Biological Resources, Geologic Hazard, and Paleontological Resources.

The EIR concluded that significant impacts related to *transportation/circulation, air quality, and historical resources* would not be fully mitigated to below a level of significance. With respect to cumulative impacts, implementation of the EIR would result in significant *transportation/circulation, air quality and historical resources* impacts, which would remain significant and unmitigated. Because there were significant unmitigated impacts associated with the original project approval, the decision maker was required to make specific and substantiated "CEQA Findings" which stated: (a) specific economic, social, or other considerations which make infeasible the mitigation measures or project alternatives identified in the FEIR, 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.

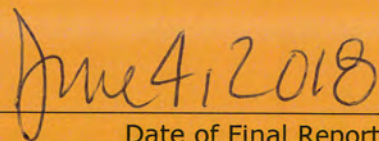
The proposed project would not result in any additional significant impacts nor would it result in an increase in the severity of impacts from that described in the previously certified EIR.

VIII. CERTIFICATION

Copies of the addendum, the certified EIR, and associated project-specific technical appendices, if any, may be reviewed by appointment in the office of the Development Services Department, or purchased for the cost of reproduction.



Anna L. McPherson, AICP
Senior Planner
Development Services Department



Date of Final Report

Analyst: **R. Benally**

Attachments:

Figure 1: Location Map

Figure 2: Project Site Aerial

Figure 3: Site Plan

Figure 4: Exterior Elevations: East and South

Figure 5: Exterior Elevations: West and North

Environmental Impact Report No. 375960/SCH No. 2015111012 (on CD only)

IX. References

- City of San Diego. 2016. *San Ysidro Community Plan and Local Coastal Land Use Plan*. July.
- City of San Diego. 2015. *San Ysidro Community Plan Update Final Environmental Impact Report*. August.
- City of San Diego. 2011. *California Environmental Quality Act Significance Determination Thresholds*. January.
- Christian Wheeler Engineering. 2015. *Report of Preliminary Geotechnical Investigation, Virginia Avenue Parking Structure, 4575 Camino De La Plaza, San Ysidro, California*. April 13.
- Harris & Associates. 2017a. *Air Quality Study for the Virginia Avenue Parking Structure Project*. December 6.
- Harris & Associates. 2017b. *Virginia Avenue Parking Structure CAP Consistency Checklist*. October 16.
- Harris & Associates. 2018. *Waste Management Plan Virginia Avenue Parking Structure*. February.
- RCE Traffic Engineering. 2017. *Traffic Impact Analysis, Virginia Avenue Parking Structure*. November 27.

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