EXHIBIT B

DRAFT CANDIDATE FINDINGS

FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT

FOR THE

SAN YSIDRO COMMUNITY PLAN UPDATE AND SAN YSIDRO HISTORIC VILLAGE SPECIFIC PLAN

PROJECT NUMBER 310690

SCH No. 2015111012

August 2016

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I. INTRODUCTION

A. Findings of Fact and Statement of Overriding Considerations

The following Candidate Findings are made for the San Ysidro Community Plan Update, as defined in the Final Program Environmental Impact Report (FEIR), and San Ysidro Historic Village Specific Plan (hereinafter respectively referred to as SYCPU and SYHVSP or the "Project"). Unless specifically indicated, these Findings apply to both the SYCPU and the SYHVSP. The environmental impacts of the Project are addressed in the FEIR dated August 2016 (State Clearinghouse No. 2015111012), which is incorporated by reference herein.

The California Environmental Quality Act (CEQA) (Pub. Res. Code §§21000, *et seq*.) and the State CEQA Guidelines (Guidelines) (14 Cal. Code Regs §§15000, *et seq*.) promulgated thereunder, require that the environmental impacts of a project be examined before a project is approved. In addition, once significant impacts have been identified, CEQA and the CEQA Guidelines require that certain findings be made before project approval. It is the exclusive discretion of the decision maker certifying the EIR to determine the adequacy of the candidate findings. Specifically, regarding findings, Guidelines Section 15091 provides:

(a) No public agency shall approve or carry out a project for which an EIR has been certified which identifies one or more significant environmental impacts of the project unless the public agency makes one or more written findings for each of those significant impacts, accompanied by a brief explanation of the rationale for each finding. The possible findings are:

1. Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental impact as identified in the Final EIR.

2. Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.

3. Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR.

(b) The findings required by subdivision (a) shall be supported by substantial evidence in the record.

(c) The finding in subdivision (a)(2) shall not be made if the agency making the finding has concurrent jurisdiction with another agency to deal with identified feasible mitigation

measures or alternatives. The finding in subdivision (a)(3) shall describe the specific reasons for rejecting identified mitigation measures and project alternatives.

(d) When making the findings required in subdivision (a)(1), the agency shall also adopt a program for reporting on or monitoring the changes which it has either required in the project or made a condition of approval to avoid or substantially lessen significant environmental impacts. These measures must be fully enforceable through permit conditions, agreements, or other measures.

(e) The public agency shall specify the location and custodian of the documents or other materials which constitute the record of the proceedings upon which its decision is based.

(f) A statement made pursuant to Section 15093 does not substitute for the findings required by this section.

These requirements also exist in Section 21081 of the CEQA statute. The "changes or alterations" referred to in Section 15091(a)(1) above, that are required in, or incorporated into, the project which avoid or substantially lessen the significant environmental impacts of the project, may include a wide variety of measures or actions as set forth in Guidelines Section 15370, including:

(a) Avoiding the impact altogether by not taking a certain action or parts of an action.

(b) Minimizing impacts by limiting the degree or magnitude of the action and its implementation.

(c) Rectifying the impact by repairing, rehabilitating, or restoring the impacted environment.

(d) Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action.

(e) Compensating for the impact by replacing or providing substitute resources or environments.

Should significant and unavoidable impacts remain after changes or alterations are applied to a project, a Statement of Overriding Considerations must be prepared. The statement provides the lead agency's views on whether the benefits of a project outweigh its unavoidable adverse environmental impacts. Regarding a Statement of Overriding Considerations, Guidelines Section 15093 provides:

(a) CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits, including region- wide or statewide environmental benefits, of a project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits, including region-wide or statewide environmental

benefits, of a project outweigh the unavoidable adverse environmental impacts, the adverse environmental impacts may be considered "acceptable."

(b) When the lead agency approves a project which will result in the occurrence of significant impacts which are identified in the final EIR but are not avoided or substantially lessened, the agency shall state in writing the specific reasons to support its action based on the final EIR and/or other information in the record. The statement of overriding considerations shall be supported by substantial evidence in the record.

(c) If an agency makes a statement of overriding considerations, the statement should be included in the record of the project approval and should be mentioned in the notice of determination. This statement does not substitute for, and shall be in addition to, findings required pursuant to Section 15091.

Having received, reviewed, and considered the FEIR for the San Ysidro Community Plan Update and San Ysidro Historic Village Specific Plan, State Clearinghouse No. 2015111012, as well as all other information in the record of proceedings on this matter, the following Findings are made by the City of San Diego (City) in its capacity as the CEQA Lead Agency. These Findings set forth the environmental basis for current and subsequent discretionary actions to be undertaken by the City and responsible agencies for the implementation of the Project.

The following Findings have been prepared by the Planning Department as candidate findings to be made by the decision-making body.

B. Record of Proceedings

For purposes of CEQA and these Findings, the Record of Proceedings for the Project consists of the following documents and other evidence, at a minimum:

- The Notice of Preparation (NOP), dated November 4, 2015, and all other public notices issued by the City in conjunction with the Project;
- The Draft PEIR (DEIR), dated May 2016;
- The FEIR for the Project, dated August 2016;
- All written comments submitted by agencies or members of the public during the public review comment period on the DEIR;
- All responses to written comments submitted by agencies or members of the public during the public review comment period on the DEIR and included in the FEIR;
- The Mitigation Monitoring and Reporting Program (MMRP);
- The reports and technical memoranda included or referenced in Responses to Comments and/or in the FEIR;

- All documents, studies, EIRs, or other materials incorporated by reference in the DEIR and the FEIR;
- Matters of common knowledge to the City, including but not limited to federal, state and local laws and regulations;
- Any documents expressly cited in these Findings and SOC; and
- Any other relevant materials required to be included in the record of proceedings pursuant to Public Resources Code Section 21167.6(e).

C. Custodian and Location of Records

The documents and other materials which constitute the administrative record for the City's actions related to the project are located at the City of San Diego, Planning Department, 1010 Second Avenue, 12th Floor, San Diego, CA 92101. The City Planning Department is the custodian of the administrative record for the Project. Copies of these documents, which constitute the record of proceedings, are and at all relevant times have been, and will be available upon request at the offices of the City Planning Department. This information is provided in compliance with Public Resources Code Section 21081.6(a)(2) and CEQA Guidelines Section 15091(e).

II. PROJECT SUMMARY

A. Project Location

The Project is located within San Diego County, in the southernmost part of the City and adjacent to the international border with Mexico. The SYCPU area encompasses a total of 1,863 acres, and is generally bounded by State Route (SR-) 905 and the Otay Mesa-Nestor community on the north, the Tijuana River Valley on the west, the Otay Mesa community on the east, and the international border with Mexico on the south. The SYCPU area is urbanized, and largely comprised of residential neighborhoods and commercial centers with the residential neighborhoods generally bounded by freeways and with the commercial uses closest to the international border. Major regional transportation corridors bisect the community, including Interstate (I-) 5, I-805, and SR-905, as well as the Blue Line of the San Diego Trolley.

The SYHVSP area encompasses approximately 112 acres within the SYCPU area, and is bounded by I-805 on the east, I-5 on the south, Smythe Avenue on the west, and West Foothill Road and parcels on the north side of Beyer Boulevard on the north. This area occurs within the geographic center of the SYCPU area, and is primarily comprised of older residential homes along with commercial and civic uses.

B. Project Description and Objectives

Project Objectives

The objectives of the SYCPU are as follows:

- Establish an attractive international border destination for residents, businesses, and visitors.
- Enhance and leverage bicultural and historic traditions and diversity.
- Provide a plan with a mix of land uses that serves residents, generates prosperity, and capitalizes on visitor traffic.
- Increase mobility for pedestrians, cyclists, transit, and automobiles through a border intermodal center, new linkages at key points, and a strong pedestrian focus.
- Identify locations for urban parks, plazas, promenades, and venues that support a variety of events and gatherings.
- Expand park and recreation opportunities, including trail options, and joint use opportunities, promoting a healthy, active community.
- Incorporate sustainability practices, policies, and design features that reduce greenhouse gas emissions, address environmental justice, and contribute to a strong economy.
- Provide a lively, pedestrian-friendly, healthy environment where kids can walk safely to school.
- Facilitate the development of the San Ysidro Historic Village.
- Craft a clear and practical implementation strategy.

Project Description

San Ysidro Community Plan Update

The proposed SYCPU is intended to further express 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 concurrent rezone would update zoning regulations within the plan area. An updated Impact Fee Study (IFS) would be adopted with the SYCPU to facilitate the implementation of the SYCPU. 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.

The Land Use Element establishes the distribution and pattern of land uses throughout the community. The Land Use Element also contains community-specific policies for the future development of residential, commercial/mixed-use, institutional, and village-designated areas within the San Ysidro community. In general, the Land Use Element incorporates the concepts of smart growth by increasing the number of residential units around existing transit stations. In addition, it would increase the maximum number of residential units by 1,662 units.

The Mobility Element is intended to improve mobility throughout the community through the development of a balanced multi-modal transportation network, and sets forth goals and policies relating to complete streets, transit, and transportation demand management (TDM).

The Urban Design Element is intended to establish goals and policies that enhance the urban fabric of San Ysidro while retaining the historic elements that contribute to the overall character of the community. The Urban Design Element establishes direction for village design, neighborhoods, community gateways and linkages, streetscapes and pedestrian orientation.

The Economic Prosperity Element establishes goals focused on increasing opportunities for densification of residential and commercial development, while protecting the existing strong neighborhoods.

The Public Facilities, Services, and Safety Element addresses the capacity and needs for future services. It also contains policies related to fire-rescue, police, storm water, water and sewer infrastructure, waste management, libraries, schools, and public utilities.

The Recreation Element is intended to assure that the recreational needs of the community are met. It establishes goals and policies for population-based parks, resource-based parks, recreation facilities, and open space within the community.

The Conservation Element contains policies on how to meet the City's sustainable development goals in areas that have been identified as suitable for development. Water is identified as a critical issue, as well as the need for urban runoff management techniques.

The Historic Preservation Element contains specific recommendations to address the history and cultural resources, unique to San Ysidro, in order to encourage protection and appreciation of these resources.

<u>San Ysidro Historic Village Specific Plan</u>

The SYHVSP is a comprehensive planning document that will implement the vision for the SYCPU for this Specific Plan Area. The overall goal of the Specific Plan is to create an attractive, intensified urban environment with a mix of land uses surrounding the Beyer Trolley Station and along San Ysidro Boulevard, while preserving the low-scale single- and multi-family character of the residential areas. The Specific Plan Area contains the following five land use designations: Low-Medium Density Residential, Medium Density Residential, Community Commercial (Residential

Permitted), Institutional, and Park. The Specific Plan sets forth a number of polices and guidelines to promote mobility including enhanced sidewalks, pedestrian crossings, and bikeways.

III. SUMMARY OF IMPACTS

Significant But Mitigated

The FEIR identifies the following direct and/or cumulatively significant impacts associated with the Project which are considered **significant but will be reduced to less than significant** with implementation of the community plan goals and policies in combination with mitigation measures identified in the FEIR:

- Biological Resources (excludes SYHVSP)
  - Sensitive Species (Direct)
  - Sensitive Habitats (Direct)
  - Wetlands (Direct)
- Geology and Soils (Excludes SYHVSP)
  - Geologic Hazards (Direct)
- Historical Resources
  - Archaeological Resources (Direct)
  - Tribal Cultural Resources (Direct)
- Noise
  - Noise Levels (Direct)
  - Vibration (Direct)
- Paleontological Resources
  - Paleontological Resources (Direct)

Significant and Unavoidable

The FEIR identifies the following direct and/or cumulatively significant impacts associated with the SYCPU and SYHVSP which are considered **significant and unavoidable because feasible mitigation measures do not exist or are not sufficient to reduce impacts to less than significant.**

- Transportation Circulation
    - Roadway Segments (Cumulative)
    - Intersections (Cumulative)
    - Freeway Segments (Cumulative)
- Air Quality
    - Construction Emissions (Direct and Cumulative)
    - Operation Emissions (Direct and Cumulative)
    - Cumulative Emissions (Direct and Cumulative)
    - Toxic Air Contaminants (Direct and Cumulative)
- Historical Resources
    - Historical Resources (Direct and Cumulative)

Less Than Significant

The FEIR concludes that the SYCPU will have **no significant (direct or cumulative) impacts,** and require no mitigation measures with respect to the following issues:

- Agriculture and Forestry Resources
- Air Quality
    - Regional Air Quality Plan Conformance
- Biological Resources
    - Sensitive Species (Cumulative)
    - Sensitive Habitats (Cumulative)
    - Wetlands (Cumulative)
    - Wildlife Movement (Direct and Cumulative)
- Conservation Planning (Direct and Cumulative)
    - Edge Effects (Direct and Cumulative)
    - Policy Conformance (Direct and Cumulative)
    - Invasive Species (Direct and Cumulative)

- Geology and Soils
    - Geologic Hazards (Cumulative)
    - Erosion and Sedimentation (Direct and Cumulative)
    - Geologic Stability (Direct and Cumulative)
- Historical Resources
    - Archaeological Resources (Cumulative)
    - Tribal Cultural Resources (Cumulative)
- Energy Conservation
- Greenhouse Gas Emissions
- Human Health/Public Safety/Hazardous Materials
- Hydrology, Water Quality, and Drainage
- Land Use
- Mineral Resources
- Noise
    - Regulatory Conformance (Direct and Cumulative)
    - Noise Levels (Cumulative)
    - Vibration (Cumulative)
    - Construction Noise (Direct and Cumulative)
    - Airport Noise (Direct and Cumulative)
- Paleontological Resources
    - Paleontological Resources (Cumulative)
- Population and Housing
- Public Services
- Public Utilities

- Transportation/Circulation
  - Roadway Segments (Direct)
  - Intersections (Direct)
  - Freeway Segments (Direct)
  - Alternative Transportation (Direct and Cumulative)
- Visual Effects and Neighborhood Character

IV. FINDINGS REGARDING SIGNIFICANT IMPACTS

A. Findings Regarding Impacts That Will be Mitigated to Below a Level of Significance (CEQA §21081(a)(1) and CEQA Guidelines §15091(a)(1)

The City, having independently reviewed and considered the information contained in the FEIR and the public record for the Project, finds, pursuant to Public Resource Code §21081(a)(1) and State CEQA Guidelines §15091(a)(1), that changes or alterations have been required in, or incorporated into, the Project which will mitigate or avoid the significant impacts on the environment related to the following issues:

NOISE

Compatibility of Land Uses with City Noise Regulations (Issue 1)

Significant Impact

A potentially significant impact will occur if future development, in accordance with the Project, occurs within areas where noise levels will exceed standards established by the General Plan and/or the Noise Ordinance.

Facts in Support of Finding

The potentially significant impacts will be mitigated to below a level of significance with implementation of the Mitigation Measure NOI-1, identified in Section 5.5 of the FEIR. Implementation of this mitigation measure will require a site-specific acoustical analysis be performed prior to the approval of building permits for new development where people will be exposed to noise exceeding normally acceptable levels. This acoustical analysis shall be performed for the following land uses: single-family homes, senior housing, and mobile homes (where exterior noise levels range between 60 and 65 CNEL); multi-family homes and mixed-use/commercial and residential (where exterior noise levels range between 65 and 70 CNEL); and all land uses where noise levels exceed the conditionally compatible exterior noise exposure levels, as defined in the City's Land Use/Noise Compatibility Guidelines. The acoustical analysis shall be conducted to ensure that barriers, building design, and/or location are capable of maintaining interior noise levels at 45

CNEL or less. Barriers may include a combination of earthen berms, masonry block, and Plexiglas. Building location may include the use of appropriate setbacks. Building design measures may include dual-pane windows, solid core exterior doors with perimeter weather stripping, and mechanical ventilation to allow windows and doors to remain closed.

Rationale and Conclusion

Mitigation Measure NOI-1 assures that future development that may expose noise sensitive land uses will comply with City standards. The mitigation measure, along with implementation of local, state, and federal noise control laws, will reduce potentially significant impacts related to noise to less than significant for future development.

NOISE

Vibration Impacts (Issue 3)

Significant Impact

A potentially significant impact will occur if future development, in accordance with the Project, occurs within areas exposed to unacceptable levels of ground-borne vibration.

Facts in Support of Finding

The potentially significant impact will be mitigated to below a level of significance with implementation of the Mitigation Measure NOI-2, as identified in Section 5.5 of the FEIR. Implementation of this mitigation measure will require that a site-specific vibration study be prepared for vibration-sensitive, land uses within the screening distances defined by the Federal Transit Administration (FTA) for potential vibration impacts related to train activity. Development will be required to implement recommended measures within the technical study to ensure that vibration levels meet the FTA criteria.

Rationale and Conclusion

Mitigation Measure NOI-2 will assure that vibration levels will be below a level of significance for future vibration-sensitive development. Implementation of actions pursuant to Mitigation Measure NOI-2 will reduce impacts related to vibration to less than significant for future development.

BIOLOGICAL RESOURCES

Sensitive Species (Issue 1)

Significant Impact

Implementation of the SYCPU has the potential to significantly impact sensitive plant and wildlife species directly through the loss of habitat or indirectly by placing development adjacent to a Multi Habitat Planning Area (MHPA).

As no sensitive species occur within the SYHVSP area, no significant impacts would occur from this component of the Project.

Facts in Support of Finding

Sensitive Plant Species

The potentially significant impact to sensitive plant species will be mitigated to below a level of significance with implementation of the Mitigation Measure BIO-1, as identified in Section 5.6 of the FEIR. Implementation of Mitigation Measure BIO-1 requires a qualified biologist survey for sensitive plants in the spring of a year with adequate rainfall, prior to initiating construction activities in a given area. If a survey cannot be conducted due to inadequate rainfall, then the project applicant shall consult with the City and Wildlife Agencies (where applicable) to determine if construction may begin based on site-specific vegetation mapping, and potential to occur analysis, or whether construction must be postponed until spring rare plant survey data is collected.

Sensitive Wildlife Species

The potentially significant impact to sensitive wildlife species will be mitigated to below a level of significance with implementation of the Mitigation Measures BIO-2 through 9, as identified in Section 5.6 of the FEIR. Prior to the construction of future development in the Project area, protocol surveys and habitat assessments will be conducted to confirm the presence or suitability of habitat for sensitive species. If the presence of a specific sensitive species is determined, then the corresponding mitigation for the respective species will be followed.

Mitigation Measure BIO-8 will be implemented to project nesting birds from construction impacts, and will require site-specific biological resources surveys be conducted in accordance with the City Biology Guidelines and Wildlife Agency protocol. Nesting season avoidance and/or pre-grading surveys and mitigation will be required to comply with the federal Endangered Species Act, Migratory Bird Treaty Act (MBTA), California Fish and Game Code, Multiple Species Conservation Plan (MSCP), and/or Environmentally Sensitive Lands (ESL) Regulations. Construction will not be allowed until it can be demonstrated that activities will not result in noise levels exceeding 60 dBA L_{EQ} at the edge of habitat occupied by sensitive birds during their respective breeding seasons.

Mitigation Measure BIO-9 will be implemented for impacts to other wildlife species and will require site-specific biology surveys be conducted to identify any other sensitive or MSCP-Covered species present on a future development within the Project area. Impacts to most sensitive and MSCP-Covered species will be mitigated by habitat-based mitigation, as established by the City's Biology Guidelines, unless a rare circumstance requires additional species-specific mitigation. In this case, the project-level biological survey report will define additional species-specific mitigation. For MSCP-Covered species, conditions from the MSCP Subarea Plan will be implemented where applicable.

Rationale and Conclusion

Implementation of actions pursuant to Mitigation Measures BIO-1 through BIO-9, combined with SYCPU policies promoting the preservation of significant resources and compliance with the City's MSCP, will reduce impacts to sensitive species to less than significant for future development.

BIOLOGICAL RESOURCES

Sensitive Habitats (Issue 2)

Significant Impact

Implementation of the SYCPU could have a substantial adverse impact on Tier I Habitats, Tier II Habitats, Tier IIIA Habitats, or Tier IIIB Habitats, as identified in the Biology Guidelines of the Land Development manual or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS.

As no sensitive species occur within the SYHVSP area, no significant impacts would occur from this component of the Project.

Facts in Support of Finding

Implementation of the SYCPU has the potential to impact up to approximately 3.8 acres of wetland communities and 98.4 acres of Tier I, II, and IIIB habitats. These impacts could occur directly through removal or indirectly by placing development adjacent to sensitive vegetation communities. Construction of the extension of Calle Primera to Camino de la Plaza will be responsible for most, if not all, of the potential impacts to wetlands associated with implementation of the SYCPU.

The potentially significant impact on sensitive habitats will be mitigated to below a level of significance with implementation of the Mitigation Measures BIO-10 and BIO-11, as identified in Section 5.6 of the FEIR. Implementation of these mitigation measures will require that, wherever feasible, wetland impacts shall be avoided. If avoidance is infeasible, wetland impacts shall be mitigated to achieve no net loss of wetland function and value. Mitigation for wetland vegetation community impacts will likely include habitat acquisition/preservation, restoration, and/or creation. Also, wherever feasible, impacts to sensitive upland vegetation communities shall be avoided. Where avoidance is not feasible, sensitive upland vegetation communities shall be mitigated through habitat acquisition/preservation, restoration, and/or creation. For individual project impacts that will not exceed 5 acres (in some cases up to 10 acres), an in-lieu contribution may be made to the City's Habitat Acquisition Fund.

Rationale and Conclusion

Implementation of actions pursuant to Mitigation Measures BIO-10 and BIO-11, combined with SYCPU policies promoting the preservation of significant resources and compliance with the City's MSCP, will assure that future development requires site-specific environmental review, analysis of

potential impacts of biological resources, and implementation of appropriate mitigation to reduce impacts to sensitive habitat to less than significant.

BIOLOGICAL RESOURCES

Wetlands (Issue 3)

Significant Impact

Implementation of the SYCPU could have a substantial adverse effect on wetlands through direct removal, filling, hydrological interruption, or other means.

As no wetlands occur within the SYHVSP area, no significant impacts would occur from this component of the Project.

Facts in Support of Finding

The potentially significant impact will be mitigated to below a level of significance with implementation of the Mitigation Measures BIO-10, as identified in Section 5.6 of the FEIR. Implementation of this mitigation measure will require that, wherever feasible, wetland impacts shall be avoided. If avoidance is infeasible, wetland impacts shall be mitigated to achieve no net loss of wetland function and value. Mitigation for wetland vegetation community impacts will include habitat acquisition/preservation, restoration, and/or creation.

There are seven vegetation communities in the SYCPU area that are likely jurisdictional wetlands (southern arroyo willow riparian forest, riparian scrub, mule fat scrub, freshwater marsh, tamarisk scrub, disturbed wetland, and unvegetated basin). Additionally, the National Wetlands Inventory shows areas mapped as “riverine,” which may be jurisdictional non-wetland waters.

Implementation of the SYCPU has the potential to impact wetlands (and non-wetland waters) directly through their loss or indirectly by placing development adjacent to them in the MHPA. These impacts will be associated with construction of the extension of Calle Primera. These impacts will be significant because these resources are regulated by the City, CDFW, USACE, RWQCB, and USFWS (if listed species are present).

Rationale and Conclusion

Implementation of the Mitigation Measure BIO-10 requiring the avoidance of wetlands where feasible, and where avoidance is infeasible, the mitigation for loss of wetlands will reduce impacts of the SYCPU on wetlands to less than significant.

HISTORICAL RESOURCES

Archaeological or Tribal Cultural Resources Impacts (Issue 1)

Significant Impact

The implementation of the Project could result in significant impacts to historical or archaeological resources resulting from the alteration, including the adverse physical or aesthetic effects and/or the destruction, of an archaeological, tribal, and/or historical resource or human remains.

Facts in Support of Finding

Archaeological Resources

The potentially significant impact to archaeological resources will be mitigated to less than significant with implementation of the Mitigation Measure HIST-1, as identified in Section 5.7 of the FEIR. Implementation of this mitigation measure will require that prior to issuance of any permit for a future development that could directly affect an archaeological resource, the City shall require a survey by a qualified archaeologist to determine the presence of archaeological resources, and define appropriate mitigation for any significant resources which may be impacted by the development activity.

Arrangements for long-term curation will be established between the applicant/property owner and the consultant prior to the initiation of the field reconnaissance, and must be included in the archaeological survey, testing, and/or data recovery report submitted to the City for review and approval. Curation will be accomplished in accordance with the California State Historic Resources Commission's Guidelines for the Curation of Archaeological Collection (dated May 7, 1993) and, if federal funding is involved, 36 Code of Federal Regulations 79 of the Federal Register.

Tribal Cultural Resources

The potentially significant impact to tribal resources will be mitigated to less than significant with implementation of the Mitigation Measure HIST-1, as identified in Section 5.7 of the FEIR. Implementation of this mitigation measure will require consultation with native tribes and mitigation of any resources determined to be significant tribal resources.

Rationale and Conclusion

Archaeological Resources

Implementation of actions pursuant to 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, will reduce impacts to archaeological or tribal cultural resources to less than significant for future development.

HISTORICAL RESOURCES

Religious or Sacred Impacts (Issue 2)

Significant Impact

Implementation of the Project could result in significant impacts to existing religious or sacred uses related to future development within the Project area.

Facts in Support of Finding

The potentially significant impacts will be mitigated to below a level of significance with implementation of the Mitigation Measure HIST-1, as described above.

Rationale and Conclusion

Implementation of actions pursuant to 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, will reduce impacts to less than significant.

HISTORICAL RESOURCES

Human Remains (Issue 3)

Significant Impact

Implementation of the Project could result in significant impacts to human remains resulting from excavation associated with new development.

Facts in Support of Finding

The potentially significant impact to human remains will be mitigated to less than significant with implementation of the Mitigation Measure HIST-1, as identified in Section 5.7 of the FEIR. This mitigation measure identifies specific actions to be taken if human remains are encountered.

Rationale and Conclusion

Implementation of actions pursuant to Mitigation Measure HIST-1 will reduce impacts to less than significant.

PALEONTOLOGICAL RESOURCES

Paleontological Resources (Issue 1)

Significant Impact

Implementation of the Project could result in significant impacts to areas where soil formations have a moderate to high potential for containing important paleontological deposits.

Facts in Support of Finding

The potentially significant impact will be mitigated to below a level of significance with implementation of the Mitigation Measure PALEO-1, as identified in Section 5.16 of the FEIR. Implementation of this mitigation measure will require that, prior to the approval of subsequent development, the City shall determine the potential for impacts to paleontological resources based on review of the project application submitted, and recommendations of a project-level analysis. If the potential for significant paleontological resources exists, the mitigation measure requires monitoring of disturbance to fossil-bearing formations and recovery of significant fossils which are encountered.

Rationale and Conclusion

Mitigation Measure PALEO-1 assures that future development will be required to recover any significant paleontological resources encountered and will reduce impacts to less than significant.

GEOLOGY AND SOILS

Geologic Hazards (Issue 1)

Significant Impact

Significant public safety risks could affect future development in areas along the eastern portion of the SYCPU area that exhibit moderate to high landslide risk.

As no landslide risk areas exist within the SYHVSP, no geologic hazards would occur.

Facts in Support of Finding

The potentially significant impact will be mitigated to less than significant with implementation of Mitigation Measure GEO-1. This mitigation measure will require that, prior to issuance of the first building permit on vacant land located within geologic hazard categories 21 or 22, a comprehensive geotechnical investigation will be conducted to address all vacant land within these categories. The geotechnical investigation will characterize the limit/extent of the slide areas, the engineering characteristics of the soil material and the hydrogeologic conditions. The results of the investigation will be adequate to develop a 3-dimensional model of the slide, and perform slope stability analyses.

The investigation will also evaluate the impact of the development on the stability of the adjoining properties.

The investigation will identify remedial measures necessary to stabilize slopes to factor of safety of 1.5 or greater. Measures will include, but not be limited to: removal/replacement of unstable deposits, installation of stabilizing features such as buttress fills or shear pins, and/or the use of protective barriers. As required by the City Engineer, these remedial measures will be implemented prior to issuance of the first building permit within the affected area. Subsequent development will demonstrate that the necessary remedial measures have been completed, or demonstrate that the development will implement equivalent remedial measures, to the satisfaction of the City Engineer, to reduce landslide effects to less than significant based on subsequent geotechnical analysis.

Rationale and Conclusion

Mitigation Measure GEO-1 will assure that impacts from landslides will be reduced to less than significant.

B. Findings Regarding Mitigation Measures Which are the Responsibility of Another Agency (CEQA §21081(a)(2)) and CEQA Guidelines §15091(a)(2))

The City, having reviewed and considered the information contained in the Final EIR and the Record of Proceedings, finds pursuant to CEQA §21081(a)(2) and CEQA Guidelines §15091(a)(2) that there are changes or alterations which could reduce significant impacts that are within the responsibility and jurisdiction of another public agency.

TRANSPORTATION

Freeways (Issue 1)

Significant Impact

Implementation of the Project will result in cumulatively significant impacts to the following freeways within the Project area: I-5, I-805 and SR-905.

Facts in Support of Finding

Improvements identified in the Regional Plan (RP) prepared by the San Diego Association of Government (SANDAG) would reduce freeway segment impacts associated with the Project. However, implementation of these improvements are outside the City's control. Caltrans is responsible for approving and implementing improvements to the state freeway system. Thus, mitigation for freeway impacts are the responsibility of Caltrans.

Rationale and Conclusion

As mitigation for freeway impacts is the primary responsibility of Caltrans, impacts to freeways are considered significant and unavoidable.

AIR QUALITY

Criteria Pollutants (Cumulative) (Issue 2)

Significant Impact

Implementation of the Project will result in a cumulatively significant impact as a result emissions during construction and operation of the future development that will contribute to criteria pollutant levels within the San Diego Air Basin that currently exceed state and federal levels.

Facts in Support of Finding

Implementation of the Regional Air Quality Strategy (RAQS) prepared by the San Diego Air Pollution Control District (APCD) is the primary means for reducing the cumulative impacts of future development within the San Diego Air Basin (SDAB). While the City has the ability through its Climate Action Plan (CAP), its General and Community Plans, and CEQA authority to reduce criteria pollutants generated by future development, the City does not have the ability to enforce criteria pollutant reduction measures on sources within the San Diego Basin that are beyond its jurisdiction.

Rationale and Conclusion

As the City is unable to enforce regional air quality controls needed to mitigate impacts, cumulative impacts of the project related to criteria pollutant levels within the SDAB are considered significant and unavoidable.

C. Findings Regarding Infeasible Mitigation Measures (CEQA §21081(a)(3) and CEQA Guidelines §15091(a)(3))

In addition to the significant unavoidable impacts which are cited in the "B" Findings, above, the Project will have significant and unavoidable impacts in the following issue areas:

HISTORICAL RESOURCES

Historical (Built Environment) Impacts (Issue 1)

Significant and Unavoidable Impact

Implementation of the SYCPU could result in unavoidable significant impacts related to the alteration of historical resources resulting from new development.

Facts in Support of Finding

Implementation of actions pursuant to Mitigation Measure HIST-2, as listed in Section 5.7.3 of the FEIR, will reduce impacts to historic buildings, structures, and objects. Implementation of this mitigation measure will require that, prior to issuance of any permit for a future development that will directly or indirectly affect a building/structure in excess of 45 years of age, the City shall

determine whether the affected building/structure is historically significant. The evaluation of historic architectural resources shall be based on criteria such as: age, location, context, association with an important person or event, uniqueness, or structural integrity, as indicated in the City's Historical Guidelines. Preferred mitigation for historic buildings or structures shall be to avoid the resource through project redesign. If the resource cannot be entirely avoided, all prudent and feasible measures to minimize harm to the resource shall be taken.

While the implementation of this mitigation measure will reduce historical resources impacts, the ability of this measure to adequately protect significant historic structures cannot be assured at the program level. Thus, potential significant impacts to important historical resources are considered significant and unavoidable at the program level.

Rationale and Conclusion

Although the City will implement Mitigation Measure HIST-2 and apply relevant goals and objectives of the SYCPU to reduce impacts to historic resources, the ability of these measures to fully mitigate potential impacts to significant historical resources cannot be determined at this time. Thus, historical resource impacts are determined to be significant and unavoidable at the program level.

TRANSPORTATION

Roadway Segments and Intersections (Issue 1)

Significant Impact

Traffic associated with the Project will result in significant cumulative impacts on selected roadway segments and intersections by raising traffic volumes to an unacceptable level of service.

Facts in Support of Finding

Tables 5.2-12 through 5.2-15 of the FEIR identify a number of improvements that would reduce impacts of the Project on local roadway segments and intersections. Improvements within Tables 5.2-12 and 5.2-13 are included in the IFS, and will be implemented based on funding generated by development fees and other funding sources. Other improvements are identified in Tables 5.2-14 and 5.2-15 but are not included in the IFS because they were determined to be infeasible for other reasons (smart growth consistency or insufficient right-of-way). While implementation of the improvements identified in Tables 5.2-12 through 5.2-15 would reduce impacts on roadway segments and intersections to acceptable levels, the City cannot assure that these improvements would be implemented for one or more of the following reasons:

- Full funding and construction cannot be assured at the time the improvement is needed;
- Implementation of the improvement is contrary to the overall goal of promoting smart growth and alternative forms of transportation in the community; or

- Sufficient right-of-way does not exist to construct the improvement.

Funding and Construction Timing

As discussed earlier, many of the roadway and intersection improvements are included in the IFS. While it is the City's intent to apply development impact fees and other funding sources toward constructing these improvements, the improvements would not be constructed until sufficient funds have been collected. As a result, the improvements may not be constructed coincident with the need, or may not be constructed at all if sufficient funds are not available. Although Mitigation Measures TRF-1 through 9, and 11 through 35 are included in the IFS and are included in the MMRP, they are considered unable to assure mitigation to a less than significant level due to funding and timing issues.

Implementation of Mitigation Measure TRF-40 is even more tenuous because this improvement is not included in the IFS and, thus, has no reliable source of funds. Such improvements were not included in the IFS because they were determined to be infeasible for other reasons (smart growth consistency or insufficient right-of-way).

Smart Growth Consistency

One of the primary principles of smart growth is to encourage the use of alternative forms of transportation by discouraging reliance on the private automobile. As the improvements identified in Tables 5.2-12 through 5.2-15 would reduce traffic congestion and encourage the automobile use, several of the mitigation measures are considered inconsistent with the overall goals of the City's General Plan, SYCPU, and Climate Action Plan. Additionally, roadway and intersection widening could impact existing or proposed sidewalks or bicycle facilities, which would discourage walking and bicycling. As such, the following mitigation measures are considered infeasible due to inconsistency with adopted City policies: TRF-10, 36, 37, 39, 42, 46, 50, and 56.

Insufficient Right-of-Way

Due the degree of development adjacent to some of the improvements identified in Tables 5.2-12 through 5.2-15, construction of those improvements is considered technically and physically infeasible due to the impact on the adjacent development and the high cost of acquiring additional right-of-way. These measures include TRF-38, 41, 43 through 45, 47, 49, and 51 through 55. Furthermore, demolition of existing buildings would generate additional environmental impacts associated with air quality, noise, GHGs, and solid waste.

Rationale and Conclusion

Although improvements are identified in the FEIR that would reduce impacts to local roadways and intersections, the City is unable to rely on these measures to reduce the impacts to less than significant levels for three reasons. First, adequate funding for the construction of improvements cannot be guaranteed; nor can the timing of construction relative to the need (the mitigation is

feasible but the timing necessary to ensure less than significant impacts is infeasible). Second, although some of the identified improvements would reduce traffic congestion, their implementation would be contrary to achieving the smart growth goals of the General Plan, SYCPU, and Climate Action Plan. Lastly, surrounding development restricts the ability to obtain sufficient right-of-way to construct some of the identified improvements. Thus, impacts of the Project on local roadway segments and intersections will be significant and unavoidable.

D. Findings Regarding Alternatives (CEQA §21081(a)(3) and CEQA Guidelines §15091(a)(3))

Because the Project will cause one or more unavoidable significant environmental impacts, the City must make findings with respect to the alternatives to the Project considered in the FEIR, evaluating whether these alternatives could feasibly avoid or substantially lessen the Project's unavoidable significant environmental impacts while achieving most of its objectives (listed in Section II.E above and Section 3.3 of the FEIR).

The City, having reviewed and considered the information contained in the FEIR and the Record of Proceedings, and pursuant to Public Resource Code §21081(a)(3) and State CEQA Guidelines §15091(a)(3), makes the following findings with respect to the alternatives identified in the FEIR.

Background

The FEIR evaluated the following alternatives:

- No Project Alternative (Adopted Community Plan);
- Lower-Density Alternative;
- Higher-Density Alternative; and
- No Calle Primera Extension.

These project alternatives are summarized below, along with the findings relevant to each alternative.

No Project Alternative (Adopted Community Plan)

Under the No Project Alternative, the Adopted Community Plan would continue to guide development in San Ysidro. Unlike the proposed SYCPU, the Adopted Community Plan does not embrace the principles of smart growth or the City of Villages Strategy. As a result, development in accordance with the Adopted Community Plan would not include the SYHVSP concept, nor would it focus new development on the San Diego Trolley stations within the community plan area. The Adopted Community Plan would result in 1,662 fewer residential units than the proposed SYCPU, and would eliminate all of the mixed-use commercial/residential areas included in the SYCPU.

Potentially Significant Impacts

Significant impacts of the No Project Alternative are summarized below.

- Air Quality
  - Construction Emissions (Direct and Cumulative)
  - Operation Emissions (Direct and Cumulative)
  - Cumulative Emissions (Direct and Cumulative)
  - Toxic Air Contaminants (Direct and Cumulative)
- Greenhouse Gas Emissions
  - Plan Inconsistency (Cumulative)
- Biological Resources
  - Sensitive Species (Direct)
  - Sensitive Habitats (Direct)
  - Wetlands (Direct)
- Geology and Soils (Excludes SYHVSP)
  - Geologic Hazards (Direct)
- Historical Resources
  - Archaeological Resources (Direct)
  - Tribal Cultural Resources (Direct)
- Noise
  - Noise Levels (Direct)
  - Vibration (Direct)
- Paleontological Resources
  - Paleontological Resources (Direct)
- Traffic Circulation
  - Roadway Segments (Cumulative)

  - Intersections (Cumulative)
  - Freeway Segments (Cumulative)
  - Alternative Transportation (Direct and Cumulative)
- Historical Resources
  - Historical Resources (Direct and Cumulative)

Finding and Supporting Facts

Development pursuant to the No Project Alternative would not eliminate any of the significant impacts associated with the Project. In fact, it would result in an additional significant impact related to alternative transportation in light of the fact that the Adopted Community Plan does not include the smart growth principles of the Project.

The estimated reduction of 1,662 residential units, associated with the No Project Alternative, would result in a proportionate reduction in criteria pollutants and GHG emissions, and the number of new residences potentially exposed to traffic noise and train vibration. However, these benefits would be offset by the increase in traffic anticipated to occur without the application of smart growth principles. It would also be inconsistent with the City's Climate Action Plan as it would not focus development in Transit Priority Areas. The FEIR concluded that even though the development potential would be reduced in comparison with the Project, the number of daily automobile trips would increase by nearly 34,000 daily trips without inclusion of the smart growth principles. This increase in traffic would offset the reduction in criteria pollutants and GHG emissions related to the reduction in the number of residential units expected at buildout of the community.

The No Project Alternative would not achieve several key General Plan policies designed to encourage the City of Villages Strategy, and therefore, would not be consistent with the Climate Action Plan. Specifically, it would not achieve Policy LU-A.7 which encourages community plans to "Achieve transit-supportive density and design, where such density can be adequately served by public facilities and services." Given the presence of two trolley stations and bus service in the community, San Ysidro is well suited to achieve this goal. Secondly, Policy LU-A.8 encourages the City to "determine at the community plan level where commercial uses should be intensified within villages and other areas served by transit, and where commercial uses should be limited or converted to other uses." San Ysidro's two TPAs offer opportunities to achieve this goal.

The No Project Alternative would also be contrary to Policy ME-B.9 of the General Plan Mobility Element which strives to "Make transit planning an integral component of long range planning documents and the development review process." With less residential units, the No Project Alternative would not promote the goals of the Housing Element to increase the number and types of housing available.

Lastly, the No Project Alternative would not include the SYHVSP. Without the SYHVSP, future development within the historic area of the community will not be enhanced through a comprehensive set of development criteria and polices intended to guide future development to promote the concepts of smart growth while preserving the historic character of the area.

Rationale and Conclusion

The No Project Alternative is rejected as infeasible because it would not eliminate or substantially reduce any of the significant impacts associated with the Project, and, in fact, would result in an additional significant transportation impact by failing to encourage the use of transportation alternatives. Furthermore, without implementation of the City of Villages Strategy, the No Project Alternative would actually result in more automobile trips and greater GHG emissions despite the reduced number of residential units. The increase in automobile trips would proportionately increase the emission of criteria pollutants and GHG emissions. Lastly, the No Project Alternative would fail to meet the General Plan's goals to increase housing within the City.

Further, the No Project Alternative is infeasible because it will not meet the General Plan policy regarding preparation of community plan updates. Specifically, Policy LU-C.1 requires that the update process "establish each community plan as an essential and integral component of the City's General Plan with clear implementation recommendations and links to General Plan goals and policies." It further states that community plan updates are important to "maintain consistency between community plans and General Plan, as together they represent the City's comprehensive plan."

Lower-Density Alternative

The Lower-Density Alternative is focused on reducing traffic and related impacts associated with criteria pollutants, GHG emissions, and noise in comparison with the Project. Reductions in traffic would be accomplished by reducing the number of residential units and commercial space since these two uses are the highest traffic generators. To reduce the number of residential units, the Lower-Density Alternative would eliminate the emphasis placed on increasing mixed-use residential/commercial areas, thereby eliminating the 1,558 residential units proposed in the mixed-use commercial designations with the Project. Without the emphasis on mixed-use in commercial areas, the Lower-Density Alternative would not accommodate a specific plan area along the lines of the SYHVSP. In addition, the Lower-Density Alternative would retain the land currently designated for industrial development which would decrease the amount of commercial land included in the proposed Project by 18 acres.

Potentially Significant Impacts

Significant impacts of the Lower-Density Alternative are summarized below.

- Air Quality
  - Construction Emissions (Direct and Cumulative)
  - Operation Emissions (Direct and Cumulative)
  - Cumulative Emissions (Direct and Cumulative)
  - Toxic Air Contaminants (Direct and Cumulative)
- Greenhouse Gas Emissions
  - Plan Inconsistency (Cumulative)
- Biological Resources (excludes SYHVSP)
  - Sensitive Species (Direct)
  - Sensitive Habitats (Direct)
  - Wetlands (Direct)
- Geology and Soils (Excludes SYHVSP)
  - Geologic Hazards (Direct)
- Historical Resources
  - Archaeological Resources (Direct)
  - Tribal Cultural Resources (Direct)
- Noise
  - Noise Levels (Direct)
  - Vibration (Direct)
- Paleontological Resources
  - Paleontological Resources (Direct)
- Traffic Circulation
  - Roadway Segments (Cumulative)

  - Intersections (Cumulative)
  - Freeway Segments (Cumulative)
  - Alternative Transportation (Direct and Cumulative)
- Historical Resources
  - Historical Resources (Direct and Cumulative)

Finding and Supporting Facts

Development pursuant to the Lower-Density Alternative would not eliminate any of the significant impacts associated with the Project. In fact, as with the No Project Alternative, it would result in an additional significant impact related to alternative transportation in light of the fact that the alternative would not promote the smart growth principles of the Project.

The estimated reduction of 1,558 residential units, associated with the Lower-Density Alternative, would result in a proportionate reduction in criteria pollutants and GHG emissions, and the number of new residences exposed to traffic noise and train vibration. However, as with the No Project Alternative, these benefits would be offset by the increase in traffic anticipated to occur without the application of smart growth principles to future development in the community. It would also be inconsistent with the City's Climate Action Plan as it would not focus development in Transit Priority Areas. This increase in traffic will offset the reduction in criteria pollutants and GHG emissions related to the reduction in the number of residential units expected at buildout of the community.

As with the No Project Alternative, the Lower Density Alternative would not achieve several key General Plan policies designed to encourage the City of Villages Strategy including LU-A.7, LU-A.8 and ME-B.9, and therefore, would not be consistent with the Climate Action Plan. With less residential units, this alternative would not promote the goals of the Housing Element to increase the number and types of housing available. Lastly, the No Project Alternative would not include the SYHVSP to enhance future development within the central part of the community while preserving the historic character.

Rationale and Conclusion

The Lower-Density Alternative is rejected as infeasible because it would not eliminate or substantially reduce any of the significant impacts associated with the Project, and, in fact, would result in an additional significant transportation and GHG impacts by failing to encourage the use of transportation alternatives. Furthermore, without implementation of the City of Villages Strategy, the Lower-Density Alternative would actually result in more automobile trips despite the reduced number of residential units. The increase in automobile trips would proportionately increase the emission of criteria pollutants and GHG emissions. Lastly, the Lower-Density Alternative would fail to meet the General Plan's goals to increase housing within the City.

Higher-Density Alternative

The Higher-Density Alternative represents additional development intensity that was considered during the initial formulation of the Project. The Higher-Density Alternative includes more residential and commercial development as well as more park land. The alternative maximizes opportunities for residential, commercial and related development, and further promotes the principles of mixed-use development, smart growth, and the City of Villages Strategy. This alternative also includes designated specific plan areas similar to the Project which provide mixed-use areas with high-density residential development in proximity to existing/proposed transit facilities. Unlike the No Project and Lower-Density Alternatives, the emphasis on smart growth would avoid a significant impact related to transportation alternatives and GHG emissions.

Potentially Significant Impacts

Significant impacts of the Higher-Density Alternative are summarized below.

- Air Quality
  - Construction Emissions (Direct and Cumulative)
  - Operation Emissions (Direct and Cumulative)
  - Cumulative Emissions (Direct and Cumulative)
  - Toxic Air Contaminants (Direct and Cumulative)
- Biological Resources (excludes SYHVSP)
  - Sensitive Species (Direct)
  - Sensitive Habitats (Direct)
  - Wetlands (Direct)
- Geology and Soils (Excludes SYHVSP)
  - Geologic Hazards (Direct)
- Historical Resources
  - Archaeological Resources (Direct)
  - Tribal Cultural Resources (Direct)
- Noise
  - Noise Levels (Direct)

  - Vibration (Direct)

- Paleontological Resources
  - Paleontological Resources (Direct)
- Traffic Circulation
  - Roadway Segments (Cumulative)
  - Intersections (Cumulative)
  - Freeway Segments (Cumulative)
- Historical Resources
  - Historical Resources (Direct and Cumulative)

Finding and Supporting Facts

Development pursuant to the Higher-Density Alternative would not eliminate or substantially reduce any of the significant impacts associated with the Project. Although, like the Project, this alternative would promote the City of Villages Strategy, the anticipated increase in the number of residential units and commercial development would generate more automobile trips than the Project. Consequently, this alternative will increase the intensity of impacts on traffic circulation, criteria pollutants, and GHG emissions with respect to the Project (although it would also be consistent overall with the Climate Action Plan). Similarly, the increase in the number of residential units associated with the Higher-Density Alternative will increase the number of sensitive receptor exposed to traffic noise and train vibration.

Rationale and Conclusion

The Higher-Density Alternative is rejected as infeasible because it would increase environmental impacts with respect to the Project without offering sufficient benefits to offset the increased level of impact.

No Calle Primera Extension Alternative

Under the No Calle Primera Extension Alternative, proposed land use designation/zoning changes, related policies, and other associated project elements would be identical to the Project, except that the extension of Calle Primera would not be included.

Potentially Significant Impacts

Significant impacts of the No Calle Primera Extension Alternative are summarized below.

- Air Quality
  - Construction Emissions (Direct and Cumulative)
  - Operation Emissions (Direct and Cumulative)
  - Cumulative Emissions (Direct and Cumulative)
  - Toxic Air Contaminants (Direct and Cumulative)
- Biological Resources (excludes SYHVSP)
  - Sensitive Species (Direct)
  - Sensitive Habitats (Direct)
  - Wetlands (Direct)
- Geology and Soils (Excludes SYHVSP)
  - Geologic Hazards (Direct)
- Historical Resources
  - Archaeological Resources (Direct)
  - Tribal Cultural Resources (Direct)
- Noise
  - Noise Levels (Direct)
  - Vibration (Direct)
- Paleontological Resources
  - Paleontological Resources (Direct)
- Traffic Circulation
  - Roadway Segments (Cumulative)
  - Intersections (Cumulative)
  - Freeway Segments (Cumulative)
- Historical Resources
  - Historical Resources (Direct and Cumulative)

Finding and Supporting Facts

The No Calle Primera Extension Alternative would reduce impacts to several issues related to biological resources, historical resources, noise, and paleontological issues compared to the Project. Specifically, this alternative would eliminate impacts to MHPA wetlands and associated direct/indirect effects to sensitive species (including the endangered least Bell's vireo). Eliminating this roadway connection would also reduce the increase in traffic noise that would be experienced by residences that would be located along streets with higher traffic volumes due to the extension.

Rationale and Conclusion

While the No Calle Primera Alternative is the environmentally superior alternative, this alternative would not meet the most basic project objectives outlined in Section 3.1.4 of the FEIR. Furthermore, the removal of this road, while it reduces some impacts related to biological resources, historical resources, noise, and paleontological resources, there would be an increase in impacts related to traffic/circulation, GHG emissions, and public services. Although it would reduce the impacts to biological resources, it would not enhance traffic flow within the community. Without the extension, motorists would be required to continue to travel longer distances to reach the regional transportation routes (e.g., I-5 and I-805). This increase in vehicle miles travelled would result in greater GHG emissions, and would be inconsistent with the policies related to circulation. This alternative would also remove a means for additional police and fire access to the commercial uses on Calle Primera and the residential uses in the San Ysidro South Neighborhood.

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