



THE CITY OF SAN DIEGO

ADDENDUM TO MITIGATED NEGATIVE DECLARATION

Project No. 637151
Addendum to MND No. 114358
SCH No. 2008041111

SUBJECT: Nancy Ridge Business Park: TENTATIVE MAP (TM) and NEIGHBORHOOD DEVELOPMENT PERMIT (NDP) for the construction of four light industrial warehouse buildings totaling 89,750 square feet on a 5.35-acre parcel previously approved for a laydown area as part of the Nancy Ridge Business Park, located at 5909 Nancy Ridge Drive (Proposed Project). The Proposed Project also includes vehicular parking and installation of utility infrastructure to City standards. The Proposed Project site is in the IL-2 -1 (Industrial-Light) zone of the Mira Mesa Community Plan, Residential Tandem Parking Overlay Zone, Marine Corps Air Station Miramar Airport Influence Area, Accident Potential Zone 2, Airport Environs Overlay Zone, FAA Part 77 Notification Area, Environmentally Sensitive Lands, and Floodway-100 and Floodplain-100 Zones. **LEGAL DESCRIPTION:** Parcel 1, the north half of the southeast quarter of the northeast quarter, in Section 9, Township 15 South, Range 3 West, San Bernardino Base Meridian, in the City of San Diego, County of San Diego, State of California (APN 343-010-21). **APPLICANT:** Cap Rock Partners.

I. SUMMARY OF PROPOSED PROJECT

The Project Applicant now seeks approvals (Proposed Project) to alter a portion of the previously Approved Project. Specifically, a TENTATIVE MAP (TM) and a NEIGHBORHOOD DEVELOPMENT PERMIT (NDP) are proposed to construct four concrete tilt-up buildings on the pad area that is developed by the Approved Project. Together, the four proposed buildings would total 89,750 square feet, and result in a Floor Area Ratio (FAR) of 0.39 in the IL-2 -1 (Industrial-Light) zone, which allows up to a FAR of 2.0. The buildings are proposed for light industrial uses and would include approximately 13,568 square feet of office space. The buildings would not exceed 35 feet in height. Each building would provide three loading docks, parking, and bicycle lockers. A summary of the Proposed Project is provided in Table 1.

Table 1: Summary of Proposed Project

	Building 1	Building 2	Building 3	Building 4	Total
Total Square Footage	24,300	20,850	17,850	26,750	89,750
Loading Docks	3	3	3	3	12
At Grade Loading Doors	2	1	1	2	6
Parking Spaces	30	21	18	39	108

The proposed buildings would be accessed by the driveway and access road from Nancy Ridge Drive that would be developed by the Approved Project.

The Proposed Project would install new utility infrastructure that would connect to the existing 6-inch recycled water line, 12-inch domestic water line, 4-inch sewer lateral, the 21-inch storm drain that are located within the Nancy Ridge Drive right-of-way, and the onsite drainage system that would be installed by the Approved Project, as described below. The Proposed Project includes installation of streetlights along the Nancy Ridge Drive frontage of the site.

Development of the proposed buildings and installation of building infrastructure would require grading of approximately 4.3 acres of the larger 5.35-acre of the Project site and involve 4,689 cubic yards of cut at a maximum depth of 4 feet, and 1,891 cubic yards of fill. Approximately, 2,797 cubic yards would be exported from the site. The soils that would be disturbed for the Proposed Project are within the Approved Project area of disturbance. As detailed previously, the Approved Project includes a maximum cut depth of 34 feet and a maximum fill depth of 36 feet with a net import of 21,500 cubic yards of fill material. The 4 feet of excavation and 4,689 cubic yards of cut that is included in the Proposed Project is within the fill material that will be installed as part of the Approved Project.

II. ENVIRONMENTAL SETTING

The Project site is in the IL-2-1 (Industrial-Light) zone of the Mira Mesa Community Plan. Topographically, the site slopes to the south with elevations ranging from approximately 280 feet above Mean Sea Level (MSL) adjacent to Nancy Ridge Drive to approximately 150 feet MSL near the drainage channel of Carroll Canyon. The Project site consists of an undeveloped hillside which has been recently grubbed per an approved engineering permit (Permit No. 2285005) and a permit has been issued for grading and installation of vegetated keystone retaining walls to create a step-down pad and driveway, pursuant to the Approved Project and approved grading plans. Construction of the Approved Project is scheduled to commence in April 2022 and will be completed prior to commencement of construction of the Proposed Project.

III. SUMMARY OF APPROVED PROJECT

The Nancy Ridge Business Park Project (Approved Project) was approved by the City of San Diego in 2008. The Approved Project proposed the construction of a paved, non-standard

access 30-foot-wide driveway and internal 40-foot wide right-of-way with a sidewalk from Nancy Ridge Drive to an outdoor storage area consisting of two graded pad areas. Both pads were proposed to be covered with Class 2 base gravel material.

Evaluation of the Approved Project in the adopted MND included grading of approximately 58,000 cubic yards of cut with a maximum cut height of 34 feet and a maximum cut slope height of 34 feet with a maximum cut slope ratio of 2:1. The Approved Project includes a total fill quantity of approximately 58,000 cubic yards with a maximum fill depth of 36 feet and a maximum fill slope height of 30 feet with a maximum fill slope ratio of 2:1.

Due to the topography of the site, the Approved Project includes approximately 2,800 feet of keystone retaining walls to stabilize the proposed step-down, flat pad areas, and the non-standard driveway. The retaining walls were approved at a maximum height of 31 feet, to be screened with drought tolerant, native plant species that conform to the City's Landscape Technical Manual. The Approved Project also includes installation of drainage, including a Modular Wetland System, an underground storage system, and storm drain. The Approved Project includes construction Best Management Practices (BMPs) and post-construction BMPs consistent with the City of San Diego requirements.

In approving the Approved Project, the City also adopted the Nancy Ridge Business Park Mitigated Negative Declaration No. 114358 (adopted MND). The adopted MND determined that, with the incorporation of mitigation measures, the Approved Project would not result in any significant and unavoidable environmental impacts.

In January 2019, a substantial conformance application was approved to modify the site plan to create one graded pad, instead of two, and increase wall heights as necessary to construct the access off Nancy Ridge Drive. The substantial conformance approval was determined to be consistent with the prior approval and included a net import of 21,500 cubic yards of fill material.

Construction of the Approved Project is not completed. Grubbing of the site has occurred. Grading (including cut and fill activities), development of the driveway, retaining walls, pad area is scheduled to commence in April 2022. Construction of the Approved Project would be completed prior to beginning construction of the Proposed Project.

IV. ENVIRONMENTAL DETERMINATION

The City previously prepared and adopted the Nancy Ridge Business Park Mitigated Negative Declaration No. 114358 (adopted MND). 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 Proposed 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 Proposed Project beyond those previously analyzed and disclosed in the adopted MND. Therefore, this Addendum has been prepared in accordance with Section 15164 of the CEQA State Guidelines.

V. IMPACT ANALYSIS

To determine whether the Proposed Project has the potential to result in new significant impacts, or substantially more severe environmental impacts than were previously disclosed, the following analysis identifies each environmental issue analyzed in detail in the previously adopted MND and evaluates the adequacy of the adopted MND's conclusions relative to the Proposed Project.

The adopted MND determined that the Approved Project has the potential to result in significant impacts to **Land Use, Biological Resources, and Paleontological Resources** and included mitigation measures to reduce potential impacts to a less than significant level. As

detailed herein, some of the measures have been completed or will be completed during implementation of the approved grading plan, and some are no longer applicable to the Proposed Project.

A summary of the impacts identified in the adopted MND compared against the impacts that may result from the Proposed Project is provided in Table 2: Impact Assessment Summary.

Table 2: Impact Assessment Summary

Environmental Issue	Certified MND Finding	Proposed Project Impacts	New Mitigation?	New or Increased Project Impact?
Aesthetics/ Neighborhood Character	Less than Significant	Less than Significant	No	No
Agricultural/ Natural/Mineral Resources	No Impact	No Impact	No	No
Air Quality	Less than Significant	Less than Significant	No	No
Biological Resources	Less than Significant with Mitigation Incorporated	Less than Significant with Mitigation Incorporated	No	No
Energy	Less than Significant	Less than Significant	No	No
Geology/Soils	Less than Significant	Less than Significant	No	No
Greenhouse Gas Emissions	Not Analyzed	Less than Significant	No	No
Historical Resources (Archaeology)	Less than Significant	Less than Significant	No	No
Human Health/ Public Safety/ Hazardous Materials	Less than Significant	Less than Significant	No	No
Hydrology/Water Quality	Less than Significant	Less than Significant	No	No
Land Use/ Planning	Less than Significant with Mitigation Incorporated	Less than Significant with Mitigation Incorporated	No	No
Noise	Less than Significant	Less than Significant	No	No
Paleontological Resources	Less than Significant with	Less than Significant	No	No

Environmental Issue	Certified MND Finding	Proposed Project Impacts	New Mitigation?	New or Increased Project Impact?
	Mitigation Incorporated			
Population and Housing	No Impact	No Impact	No	No
Public Services	Less than Significant	Less than Significant	No	No
Recreational Resources	Less than Significant	Less than Significant	No	No
Transportation/Traffic	Less than Significant	Less than Significant	No	No
Utilities	Less than Significant	Less than Significant	No	No
Water Conservation	Less than Significant	Less than Significant	No	No

Aesthetics/Neighborhood Character

Approved Project - Nancy Ridge Business Park

The adopted MND considered whether the Approved Project could result in a significant environmental impact to landforms as a result of altering more than 2,000 cubic yards of earth per graded acre. However, the adopted MND determined that impacts would be considered significant if the proposed excavation or fill is necessary to permit installation of alternative design features such as step-down or detached buildings, non-typical roadway or parking lot designs, and alternative retaining wall designs are included to reduce the project's overall grading requirements.

The adopted MND determined the Approved Project's two step-down, flat-pad areas, would require approximately 58,000 cubic yards of cut with a maximum cut height of 34 feet and a maximum cut slope height of 30 feet at a maximum cut slope ratio of 2:1; and would require approximately 58,000 cubic yards of fill with a maximum fill depth of 36 feet and a maximum fill slope height of 30 feet at a maximum fill slope ratio of 2:1. The Approved Project included approximately 2,800 feet of keystone retaining walls with a maximum height of 31 feet to stabilize the stepped-down flat pads. The Approved Project also included a non-standard roadway design to access the graded pads, which contained no street frontage. Based upon the site topography, the location of the parcels, and the Approved Project's consistency with the City's grading and design criteria, the adopted MND determined that based on the topography of the site, its location, the amount of grading, and the use of keystone retaining walls, the Approved Project would result in less than significant impacts.

The adopted MND also determined that impacts to visual quality would be less than significant because the keystone retaining walls would be 80% screened by vegetation within two years of development. The adopted MND determined that landscape screening would

be adequately achieved through the use of wall plantings within the retaining walls and shrubs and trees located directly in front of the walls. All landscaping would consist of native, non-invasive plant species, and would be required to conform to the City's Landscape Technical Manual Landscaping. The keystone retaining walls would be of an earth tone/sandstone color similar to the surrounding environment.

Thus, based upon the Approved Project's design features, the adopted MND determined that no significant aesthetics or visual impacts would occur as a result of project implementation, and no mitigation was required.

Proposed Project

Regarding impacts to landforms, the Proposed Project would develop four concrete tilt-up buildings for light industrial and office uses with loading docks, parking, and circulation on the previously approved step-down, flat-pad areas. To develop the structure foundations, construction would include approximately 4 feet of cut and fill, which would not alter the landform of the graded pad. In addition, the Proposed Project involves grading 4,689 cubic yards of cut and 1,891 cubic yards of fill over 4.3 acres of the greater 5.35-acre Project site. Such grading does not involve alteration of more than 2,000 cubic yards of earth per graded acre. Therefore, no new or substantially more severe impacts related to alteration of landforms would occur from implementation of the Proposed Project.

The visual quality of the four concrete tilt-up buildings, loading dock areas, parking lots, and landscaping on the Project site would be consistent with the site's Light Industrial land use designation, the IL-2 -1 (Industrial-Light) zoning designation, and the existing surrounding light industrial uses. The Mira Mesa Community Plan describes that the Light Industrial designation is intended for manufacturing, storage, warehousing, distribution, and similar uses. In addition, the Proposed Project would be consistent with the IL-2 -1 zoning standards that are applicable to the Project site, as demonstrated below in Table AE-1.

Table AE-1: Proposed Project Consistency with Light Industrial Development Standards

IL-2 -1 Zoning Standard		Proposed Project
Minimum Front Setback (ft)	15	85
Standard Front Setback (ft)	20	85
Minimum Side Setback (ft)	10	70
Minimum Rear Setback (ft)	15	67
Maximum Floor Area Ratio	2.0	0.39

The Proposed Project would also install new landscaping along the Nancy Ridge Drive right-of-way adjacent to the Project site and install new landscaping around the proposed buildings and throughout the parking areas, which would screen views of the industrial buildings and enhance the visual character of the site. In addition, views of the buildings on the Project site would be limited due to the grade difference between the building pad area, which would be between 234 and 246 MSL, and is 34 feet lower than the Nancy Ridge Drive right-of-way that is at 280 MSL. Due to the limited views of the proposed structures that

would be developed in compliance with the existing zoning standards and consistent with other existing development along Nancy Ridge Drive, impacts would remain less than significant, and no new or substantially more severe impacts related to the visual quality would occur. No new mitigation measures are required.

Regarding lighting, development of four industrial warehouse buildings would introduce new sources of nighttime light and glare into the area from street lighting, parking lot lighting, and building security lighting. However, the lighting from the Proposed Project would be similar to the existing lighting in the area from the existing uses along Nancy Ridge Drive and spill of light outside of the proposed development area and "night glow" would be reduced by using hoods and other design features on the light fixtures used for the Proposed Project. Implementation of existing regulatory requirements per the City's Municipal Code Section 142.0740 for outdoor lighting, would occur during the City's permitting process and would ensure that impacts related to lighting remain less than significant.

The proposed building materials do not consist of highly reflective materials, lights would be shielded consistent with the municipal code requirements, and the topography difference between the site and Nancy Ridge Drive and proposed landscaping would screen sources of light and reduce the potential for glare. In addition, the City's Municipal Code Section 142.0730, Glare Regulations, provides standards for exterior building materials to reduce potential impacts related to glare. Verification that these standards are adhered to would occur during the City's permitting process. Thus, impacts would remain less than significant, and no new or substantially more severe impacts would occur. No new mitigation measures are required.

No new or substantially greater impacts would occur with implementation of the Proposed Project when compared to those identified in the previously adopted MND. The impacts related to the Proposed Project are consistent with the impacts identified in the previously adopted MND and the level of impact (less than significant impact) remains unchanged.

Conclusion

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

Mitigation Measures

No mitigation measures for Aesthetics and Neighborhood Character were included in the adopted MND, and no new mitigation measures are required for the Proposed Project.

Agricultural/Natural/Mineral Resources

Approved Project - 2008 Nancy Ridge Business Park

The adopted MND determined that no known mineral resources are present on the Project site. Therefore, no impacts to mineral resources would occur. The adopted MND also determined that the site has never been used for farming purposes and is highly unlikely to be used for such purposes in the future due to the steep slopes and natural topography. The adopted MND determined that no impacts related to agricultural resources would occur, and no mitigation measures were required.

Proposed Project

Consistent with the findings of the adopted MND, the Proposed Project would not result in impacts related to mineral or agricultural resources, as no such resources have been identified on the site. The site has a Light Industrial land use designation and an IL-2-1 (Industrial-Light) zoning designation that do not provide for either mineral extraction or agricultural uses, and no such resources are located in the vicinity of the Project site. Therefore, consistent with the adopted MND, impacts related to mineral or agricultural resources would not occur from implementation of the Proposed Project.

No new or substantially greater impacts would occur with implementation of the Proposed Project when compared to those identified in the previously adopted MND. The impacts related to the Proposed Project are consistent with the impacts identified in the previously adopted MND and the level of impact (no impact) remains unchanged.

Conclusion

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

Mitigation Measures

No mitigation measures for Agricultural/Natural/Mineral Resources were included in the adopted MND, and no new mitigation measures are required for the Proposed Project.

Air Quality

Approved Project - 2008 Nancy Ridge Business Park

The adopted MND determined that the Approved Project would not result in a significant number of vehicle trips, nor would it result in significant stationary source emissions. Therefore, the adopted MND determined that the Approved Project would not conflict with or obstruct the implementation of an air quality plan or contribute substantially to an existing or

projected air quality violation. The adopted MND also determined that no significant amount of air pollutants, including particulate matter, were expected to be generated and any odors that may occur during construction would be limited and less than significant. Furthermore, the adopted MND determined that no sensitive receptors are present within the immediate vicinity of the Project site and impacts to sensitive receptors would not occur. No mitigation measures related to air quality were included in the adopted MND.

Proposed Project

AQMP Consistency. The existing San Diego Regional Air Quality Strategy is the existing air quality management plan for the City that sets forth the San Diego Air Pollution Control District's (SDAPCD) strategies for achieving the National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS). The San Diego Air Basin (SDAB) is designated a non-attainment area for the federal and state ozone standard. Accordingly, the RAQS was developed to identify feasible emission control measures and provide progress toward attaining the standards for ozone. The two pollutants addressed in the RAQS are reactive organic gases (ROG) and oxides of nitrogen (NOX), which are precursors to the formation of ozone. Projected increases in motor vehicle usage, population, and growth create challenges in controlling emissions and, by extension, to maintaining and improving air quality. The RAQS was most recently adopted in 2016.

The growth projections used by the SDAPCD to develop the RAQS emissions budgets are based on the population, vehicle trends, and land use plans developed in general plans. As such, projects that propose development that is consistent with the growth anticipated by SANDAG's growth projections and/or the General Plan would not conflict with the RAQS.

The Project site is in the IL-2-1 (Industrial-Light) zone of the Mira Mesa Community Plan, which allows light industrial development, such as the Proposed Project, up to a development intensity of a 2.0 FAR. The Proposed Project would permit construction of up to 89,750 square feet on the 5.35-acre site, resulting in a FAR of 0.39, which is less than a FAR of 2.0. Therefore, the Proposed Project would not exceed the planned development intensity of the site. Thus, the Proposed Project would be consistent with the growth anticipated by the General Plan. Further, as detailed below, the Proposed Project would not result in construction or operational emissions in excess of the applicable significance thresholds for criteria pollutants. Overall, the Proposed Project would not obstruct or conflict with implementation of the RAQS, and impacts related to air quality planning would be less than significant.

Construction Emissions. Construction emissions associated with development of the Proposed Project were quantified using CalEEMod. These emissions include exhaust from construction equipment, fugitive dust from vehicle trips, fugitive dust from grading, and off-site vehicle exhaust from on-road vehicles. However, construction activities would be subject to several control measures per the requirements of the SDAPCD and California Air Resources Board (CARB) Airborne Toxic Control Measures (ATCM), which include:

- SDAPCD Rule 55, construction shall water exposed areas a minimum of twice per day.
- SDAPCD Rule 67, construction shall use regulated coatings for all architectural coatings.
- CARB's ATCM 13 (California Code of Regulations Chapter 10 Section 2485), no idling

shall exceed 5 minutes unless more time is required per engine manufacturers' specifications or for safety reasons.

As shown in Table AQ-1, with implementation of the Proposed Project, total emissions of criteria pollutants and precursors related to the proposed construction activities would be below the SDAPCD thresholds. As described previously, construction of the Approved Project would be completed prior to commencement of construction of the Proposed Project. Thus, there are no construction components of the Approved Project that would occur at the same time as the Proposed Project that would result in additional daily emissions that could combine with the Proposed Project to result in a threshold exceedance. Therefore, impacts related to construction emissions would be less than significant, and no mitigation measures are required.

Table AQ-1: Proposed Project Construction Emissions

Construction Activity	Maximum Daily Emissions (pounds/day)					
	ROG	NOx	CO	SO ₂	PM ₁₀	PM _{2.5}
2021	2.7	36.0	19.0	0.1	5.0	2.9
2022	117.5	17.8	18.3	<0.1	1.4	0.9
Maximum Daily Emissions	117.5	36.0	19.0	0.1	5.0	2.9
SDCAPCD Threshold	137	250	550	250	100	No Threshold
Exceed Threshold?	No	No	No	No	No	No
Source: CalEEMod, Appendix A Notes: NOx = oxides of nitrogen, PM ₁₀ = particulate matter 10 microns or less in diameter, ROG = reactive organic gases, PM _{2.5} = particulate matter 2.5 microns or less in diameter, CO = carbon monoxide						

Operational Emissions. Implementation of the Proposed Project would result in a small increase in long-term regional emissions of criteria air pollutants and ozone precursors associated with area sources, such as natural gas consumption, landscaping, applications of architectural coatings, and consumer products. However, operational vehicular emissions would generate a majority of the emissions associated with the Proposed Project. Operational emissions were modeled using CalEEMod and are presented in Tables AQ-2 and AQ-3. As shown, long-term regional emissions of the criteria pollutants would be below the SDAPCD's applicable thresholds. There are no other operational components of the Approved Project that would occur at the same time as the Proposed Project that would add together with the Proposed Project that would result in a threshold exceedance. Therefore, operational emissions would not exceed the NAAQS and CAAQS, would not result in a cumulatively considerable net increase of any criteria pollutant impacts, and would remain less than significant. No new significant impacts, and no substantially more severe impacts than were previously disclosed in the adopted MND, would occur.

Table AQ-2: Operational Maximum Daily Emissions

Operational Activity	ROG	NOx	CO	SO₂	PM₁₀	PM_{2.5}
Area	2.5	<0.1	<0.1	0.0	<0.1	<0.1
Energy	<0.1	0.3	0.2	<0.1	<0.1	<0.1
Mobile	0.7	8.8	8.4	0.0	2.9	0.8
Maximum Daily Emissions	3.3	9.1	8.7	<0.1	2.9	0.8
SDCAPCD Threshold	137	250	550	250	100	No Threshold
Exceed Threshold?	No	No	No	No	No	No

Source: CalEEMod, Appendix A

Table AQ-3: Operational Annual Total Emissions

Operational Activity	ROG	NOx	CO	SO₂	PM₁₀	PM_{2.5}
Area	0.5	<0.1	<0.1	<0.1	<0.1	<0.1
Energy	<0.1	0.1	<0.1	<0.1	<0.1	<0.1
Mobile	0.1	1.6	1.5	<0.1	0.5	0.1
Annual Emissions	0.6	1.7	1.5	<0.1	0.5	0.1
SDCAPCD Threshold	15	40	100	40	15	No Threshold
Exceed Threshold?	No	No	No	No	No	No

Source: CalEEMod, Appendix A

Odor Emissions. The Proposed Project does not propose new land uses typically associated with emitting objectionable odors. The Project site is not located near existing agricultural uses, and the Project site is not located near residential uses, which are odor sensitive. As with the Approved Project, potential odor sources associated with the Proposed Project may result from construction equipment exhaust and may also result from the application of asphalt and architectural coatings during construction activities. During operations, potential odor sources include odors from exhaust as well as the temporary storage of typical solid waste (refuse).

As with the Approved Project, standard construction conditions and requirements would minimize odor impacts from construction. The construction odor emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of the respective phase of construction and is thus considered less than significant. The Proposed Project-generated refuse would be stored in covered containers and removed at regular

intervals in compliance with the City's solid waste regulations. Additionally, the Proposed Project would be required to implement CARB's ATCM 13 (California Code of Regulations Chapter 10 Section 2485) regulations that limit idling to 5 minutes, which would reduce odors from the smell of truck exhaust. Therefore, consistent with the findings of the adopted MND, odor impacts would remain less than significant.

Consistent with the findings of the adopted MND, impacts related to air quality would be less than significant. No new or substantially greater impacts would occur with implementation of the Proposed Project when compared against those identified in the previously adopted MND. The impacts related to the Proposed Project are consistent with the impacts identified in the previously adopted MND and the level of impact (less than significant impact) remains unchanged.

Conclusion

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

Mitigation Measures

No mitigation measures for air quality were included in the adopted MND, and no new mitigation measures are required for the Proposed Project.

Biological Resources

Approved Project - 2008 Nancy Ridge Business Park

The adopted MND determined that the Approved Project would result in impacts to approximately 3.81 acres of Diegan Coastal Sage Scrub (CSS) and 0.36 acres of non-native grasslands (NNG). No impacts to Coast Live Oak Woodland, Southern Mixed Chaparral and Southern Willow Scrub would occur as these habitats are located outside of the development area and appropriate buffers precluded impacts to sensitive upland habitats or wetlands. In addition, the adopted MND determined that potential indirect impacts related to drainage and sedimentation would be mitigated through compliance with construction, post-construction, and permanent BMPs. The adopted MND also determined that 1.71 acres of Southern Willow Scrub wetland habitat would be conserved by a conservation easement within the City of San Diego Multiple Species Conservation Programs (MSCP) Multi-Habitat Planning Area (MHPA).

The adopted MND included mitigation measures to mitigate the loss of the CSS and NNG habitat areas. Also, a MHPA Boundary Line Adjustment (BLA) was approved by the California Department of Fish and Wildlife and the U.S. Department of Fish and Wildlife Service on January 16, 2008, which removed approximately 3.66 acres of sensitive habitat from the MHPA within the development area, and added approximately 8.02 acres of MHPA habitat to

an approved City conservation easement to result in a net gain of approximately 4.36 acres of conservation area, which satisfied the upland habitat mitigation requirement of 4.17 acres, and no further mitigation related to loss of habitat was required. The biological resource report identified San Diego barrel cactus on-site, but not within the development area. Thus, the adopted MND determined that no impacts to barrel cacti would occur.

The adopted MND determined that the Project site and adjacent parcels contain mature trees which have the potential for nesting raptors and that project-related construction activities could have the potential to indirectly impact raptor species during the breeding season (February 1-September 15). If construction occurs during the raptor breeding season, a preconstruction survey would be conducted by a qualified biologist to determine whether nesting raptors are present. No construction would occur within 300 feet of any identified nest(s) until the young fledge. Noise impacts to biological resources would be avoided during the breeding season through pre-construction surveys and adherence to appropriate noise buffer zone restrictions.

Proposed Project

The Proposed Project would develop new building structures within the graded pad areas of the site. However, the Proposed Project does not expand the development footprint described and analyzed in the adopted MND. The Proposed Project does not involve disturbance of previously undisturbed vegetated areas and no additional loss of habitat, including CSS, NNG, or San Diego barrel cactus, would occur. As described previously, the loss of habitat from the approved grading permit was mitigated to a less than significant level by the approved MHP BLA that resulted in a net gain of approximately 4.36 acres of conservation area. No new significant impact, and no substantially more severe impact than was previously disclosed would occur. As no additional loss of habitat would occur, no additional mitigation would be required.

Areas adjacent to the site contain sensitive habitat, trees, and other vegetation that may be used by birds and raptors for nesting. Thus, site grading prior to construction of the Proposed Project would be required to implement Mitigation Measures B.2 and C.1 from the adopted MND. The adopted MND determined that with implementation of these measures, construction impacts to adjacent habitat areas would be less than significant. Also, as required by Mitigation Measures B.3 and C.2, if grading or construction begins during the Coastal California Gnatcatcher breeding season (between March 1 and August 1), or typical bird nesting season (February 1 -September 15), a preconstruction survey by a qualified biologist would be required to determine whether nesting Gnatcatchers or other birds are present; and if present appropriate buffers would be implemented until the young fledge. Consistent with the findings of the adopted MND, impacts would be less than significant with implementation of the mitigation measures previously identified. No new or substantially more severe biological resource impacts would occur, and no new mitigation is required.

No new or substantially greater impacts would occur with implementation of the Proposed Project when compared to those identified in the previously adopted MND. The impacts related to the Proposed Project are consistent with the impacts identified in the previously

adopted MND and the level of impact (less than significant impact with mitigation incorporated) remains unchanged.

Conclusion

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

Mitigation Measures

Mitigation Measures B.2, B.3, C.1, and C.2, as detailed below, from the approved MND remain applicable to the Proposed Project.

Energy

Approved Project - 2008 Nancy Ridge Business Park

The adopted MND determined that the Approved Project would not result in the use of excessive or wasteful amounts of fuel, energy, or power and that impacts would be less than significant. No mitigation measures related to energy were included in the adopted MND.

Proposed Project

Construction. Energy used during construction of the Proposed Project would not be excessive or unusual. Construction activities related to the proposed buildings and the associated infrastructure would not result in demand for fuel greater than other development projects in southern California. In addition, the extent of construction activities that would occur are limited, and the demand for construction-related electricity and fuels would be limited to that time frame. Table E-1 shows that construction of the Proposed Project would require 5,673 gallons of diesel fuel and 5,173 gallons of gasoline for construction.

Table E-1: Proposed Project Construction Fuel Usage

Construction Source	Gallons of Diesel Fuel	Gallons of Gasoline Fuel
Construction Vehicles	5,673	5,173
Off-road Construction Equipment	12,333	0
Construction Total	18,006	5,173

Source: CalEEMod, Appendix A

The City requires construction contractors to demonstrate compliance with applicable CARB regulations governing the accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment. In addition, compliance with existing CARB idling

restrictions and the use of newer engines and equipment would reduce fuel combustion and energy consumption. Construction activities would require limited energy consumption, would comply with all existing regulations, the activities would not use large amounts of energy or fuel in a wasteful manner. Thus, impacts related to construction energy usage would be less than significant.

Operation. Once operational, the Proposed Project would generate ongoing demand for electricity, natural gas, and diesel/gasoline for vehicle trips. Operational use of energy includes the heating, cooling, and lighting of the buildings, water heating, operation of electrical systems and plug-in appliances, parking lot and outdoor lighting, and the transport of electricity, natural gas, and water to the areas where they would be consumed. This use of energy is typical for urban development, and no operational activities or land uses would occur that would result in extraordinary energy consumption. Table E-2 shows that operation of the Proposed Project would utilize approximately 2,927,083 gallons of diesel fuel and 29,169,720 gallons of gasoline for annually.

Table E-2: Proposed Project Operational Fuel and Energy Usage per Year

Transportation	29,169,720 gallons of gasoline	2,927,083 gallons of diesel fuel
Electricity	761,222 Kilowatt-Hours	
Natural Gas	1,037,510 Thousands British Thermal Units	

Source: CalEEMod, Appendix A

The State of California provides a minimum standard for building design and construction standards through Title 24 of the California Code of Regulations (CCR). Compliance with Title 24 is mandatory at the time new building permits are issued by the City that the Proposed Project shall comply with the adopted California Energy Code (Code of Regulations, Title 24 Part 6). The City's administration of the Title 24 requirements includes review of design components and energy conservation measures that occurs during the permitting process, which ensures that all requirements are met.

The Title 24 CalGreen and energy standards are updated on a regular basis, with the most recent approved update consisting of the 2019 California Green Building Code Standards that became effective January 1, 2020. The CEC anticipates that non-residential buildings use approximately 30% less energy with implementation of the updated requirements. The CalGreen Building Standards Code has been adopted by the City in the Municipal; Code as Chapter 14 Article 10 "Green Building Regulations". The 2019 CALGreen standards that are applicable to the Proposed Project include, but are not limited to, the following:

- Short-term bicycle parking. Provide permanently anchored bicycle racks within 200 feet of the visitors' entrance, readily visible to passers-by, for 5% of new visitor motorized vehicle parking spaces being added, with a minimum of one two-bike capacity rack.
- Long-term bicycle parking. For new buildings with tenant spaces that have 10 or more tenant-occupants, provide secure bicycle parking for 5% of the tenant-occupant vehicular parking spaces with a minimum of one bicycle parking facility.

- Designated parking for clean air vehicles. Provide designated parking for any combination of low-emitting, fuel-efficient and carpool/van pool vehicles as shown in Title 24 Part 6 Table 5.106.5.2.
- Electric vehicle charging stations. Facilitate the future installation of electric vehicle supply equipment. The compliance requires empty raceways for future conduit and documentation that the electrical system has adequate capacity for the future load.
- Outdoor light pollution reduction. Outdoor lighting systems shall be designed to meet the backlight, uplight and glare ratings per Title 24 Part 6 Table 5.106.8.
- Recycling by Occupants. Provide readily accessible areas that serve the entire building and are identified for the depositing, storage and collection of non-hazardous materials for recycling, including (at a minimum) paper, corrugated cardboard, glass, plastics, organic waste, and metals.

Additionally, the Proposed Project would be served by San Diego Gas & Electric, which currently has an energy mix that includes 43 percent renewable energy and is on track to achieve 50 percent renewable energy content by 2030 as required by the State of California's Renewable Portfolio Standards. Although the 2019 CALGreen standards were adopted subsequent to approval of the Approved Project and adoption of the adopted MND, adherence to the standards support a finding that energy impacts would remain less than significant. The Proposed Project would not result in the use of excessive amounts of energy, create unnecessary energy waste, or conflict with any adopted plan for renewable energy efficiency, and impacts would be less than significant.

No new or substantially greater impacts would occur with implementation of the Proposed Project when compared against those identified in the previously adopted MND. The impacts related to the Proposed Project are consistent with the impacts identified in the previously adopted MND and the level of impact (less than significant impact) remains unchanged.

Conclusion

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

Mitigation Measures

No mitigation measures for energy were included in the adopted MND, and no new mitigation measures are required for the Proposed Project.

Geology and Soils

Approved Project - 2008 Nancy Ridge Business Park

The adopted MND determined that the geotechnical reports conducted for the Project site did not identify any significant geologic hazards. The adopted MND determined that native soils underlying the site consist of dense, competent sandstones and cobble conglomerates with a silty sand matrix that have relatively high strength parameters and very low to low expansive characteristics, which have high bearing capacities and stand well in cut and fill slopes. The alluvial/colluvial deposits in the drainage courses are loose and would require complete removal to competent formational soils for preparation of proposed fills.

The adopted MND determined that no active, or potentially active, faults are present on-site, and the site is not considered susceptible to surface rupture. The nearest active fault is the Rose Canyon Fault Zone located approximately four miles west of the Project site, and that although, the site is subject to ground shaking and seismic forces from regional active faults, no design parameters other than compliance with the California Building Code is necessary for development of the site.

The adopted MND also determined that the development area of the site is not subject to liquefaction due to the soil density, grain-size distribution, and lack of ground water. Therefore, the potential for liquefaction was determined to be low. Overall, the adopted MND determined that the Approved Project would not cause a significant effect on the environment. Impacts were determined to be less than significant, and no mitigation was required.

Proposed Project

Consistent with the findings of the adopted MND, the Geotechnical Investigation prepared for the Proposed Project determined that the potential for ground rupture is very low due to the absence of active faults at the site. The site does not contain or adjacent to a known active, potentially active, or inactive fault. The Geotechnical Investigation describes that the nearest known active fault is the Newport-Inglewood-Rose Canyon Fault Zone, located approximately 5 miles west of the site. Earthquakes that might occur on the Newport-Inglewood-Rose Canyon Fault Zone or other faults within the southern California region are potential generators of ground motion at the site. However, structures built in the City are required to be built in compliance with the California Building Code (CBC [California Code of Regulations, Title 24, Part 2]), included in the Municipal Code as Chapter 9. Compliance with the CBC would ensure earthquake safety based on factors including occupancy type, the types of soils onsite, and the probable strength of the ground motion. Compliance with the CBC would include the incorporation of: 1) seismic safety features to minimize the potential for significant effects as a result of earthquakes; 2) proper building footings and foundations; and 3) construction of the building structures so that it would withstand the effects of strong ground shaking. Therefore, with CBC compliance, the Proposed Project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking, and impacts would remain less than significant.

The Geotechnical Investigation also determined that the potential for liquefaction and seismically induced settlement occurring within the site is very low due to the dense nature of the formational materials and lack of groundwater within 50 feet of the ground surface. Additionally, the site is not mapped in the vicinity of geologic hazards such as landslides. The Geotechnical Investigation did not find any evidence of ancient landslide deposits at the site during onsite work or during aerial photo research. Although, the investigation did identify that the expansion potential of soils to ranges from very low to medium, compliance with the CBC would be incorporated into grading plans and building specifications as a condition of construction permit approval to ensure that the proposed buildings would withstand the effects of related to ground movement, including expansive soils. Because the Geotechnical Investigation completed for the Proposed Project is consistent with the findings of the adopted MND, it does not constitute new information indicating a new or substantial more severe environmental impact. Impacts would remain less than significant.

No new or substantially greater impacts would occur with implementation of the Proposed Project when compared against those identified in the previously adopted MND. The impacts related to the Proposed Project are consistent with the impacts identified in the previously adopted MND and the level of impact (less than significant impact) remains unchanged.

Conclusion

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

Mitigation Measures

No mitigation measures for geology and soils were included in the adopted MND, and no new mitigation measures are required for the Proposed Project.

Greenhouse Gas Emissions

Approved Project - 2008 Nancy Ridge Business Park

Although greenhouse gas emissions and climate change concerns were well known in 2008, and therefore the potential for such emissions and impacts do not constitute new information, the adopted MND did not analyze the potential for related impacts. No mitigation measures related to greenhouse gas emissions were included in the adopted MND.

Proposed Project

Following adoption of the MND, the City adopted a Climate Action Plan (CAP) in December 2015 that outlines the actions the City will undertake to achieve its proportional share of State GHG emission reductions. The City has identified the following CAP strategies to reduce GHG: energy- and water-efficient buildings; clean and renewable energy; bicycling, walking, transit, and land use; zero waste (gas and waste management); and climate resiliency. In order to ensure that future developments comply with the CAP, the City adopted a CAP Consistency Checklist, adopted July 12, 2016, and revised June 2017, which is the primary document utilized by the City to ensure a project-by-project consistency with the underlying assumptions in the CAP to ensure that the specified emission reduction targets of reducing GHG emissions by 50 percent from the year 2010 baseline by year 2035 are achieved. Therefore, the Proposed Project would be required to comply with the CAP Consistency Checklist to reduce potential impacts to a less than significant level.

CAP Consistency Checklist. The City's CAP Consistency Checklist includes a three-step process to determine if a project would result in a GHG impact. Step 1 consists of an evaluation to determine the project's consistency with existing General Plan, Community Plan, and zoning designations for the site. Step 2 consists of an evaluation of the project's consistency with applicable strategies and actions of the CAP. Step 3 is to determine whether a project with a land use and/or zone designation change within a Transit Priority Area would be consistent with the assumptions of the CAP. Step 3 would only apply if Step 1 is answered in the affirmative under Option B, which applies to projects that are not consistent with the existing land use plan and zoning designations, and would result in an increased density within a Transit Priority Area.

The Proposed Project completed the CAP Consistency Checklist, which is included as Appendix B. Completion of Step 1: Land Use Consistency of the CAP Consistency Checklist determined that the Proposed Project would be consistent with the existing General Plan and Community Plan land use designation of Light Industrial, as well as the existing zoning designation of IL-2 -1 (Industrial-Light). Therefore, the Proposed Project would be consistent with the growth projections utilized in the development of the CAP per Step 1 (A).

Completion of Step 2: CAP Strategies Consistency of the CAP Consistency Checklist determined that the Proposed Project would be consistent with applicable strategies and action for reducing GHG emissions. This includes Proposed Project features consistent with the energy and water efficient buildings strategy, as well as bicycling, walking, transit, and land use strategies. These Proposed Project features would be assured as a condition of Proposed Project approval. Step 3 is not applicable to the Proposed Project because it is consistent with the General Plan, community plan, and zoning designation of the site. Therefore, the Proposed Project would be consistent with the CAP.

Based on the Proposed Project's consistency with the City's CAP Consistency Checklist, the Proposed Project's contribution of GHGs to cumulative statewide emissions would be less than cumulatively considerable. Therefore, the Proposed Project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of

GHGs or generate GHG emissions that may adversely affect the environment, and impacts would be less than significant.

No new or substantially greater impacts would occur with implementation of the Proposed Project.

Conclusion

Based on the foregoing analysis and information, there is no evidence that the Proposed Project would require a major change to the adopted MND. The Proposed Project's GHG impacts were determined to be less than significant.

Mitigation Measures

No mitigation measures for greenhouse gas emissions were included in the adopted MND, and no new mitigation measures are required for the Proposed Project.

Historical Resources (Archaeology)

Approved Project - 2008 Nancy Ridge Business Park

The adopted MND determined that the Project site is located in an area with a high potential for subsurface archaeological resources. No recorded cultural resources were identified on-site. Although, record sites were identified within a half-mile radius, the archaeological survey that was completed for the adopted MND did not identify any cultural resources during the field reconnaissance and determined that the potential for subsurface cultural resources is low due to the site topography that limits the potential for previous human habitation on the site. Thus, the adopted MND determined that potential impacts to cultural resources were less than significant, and no mitigation was required.

Proposed Project

The Proposed Project does not change the development footprint and would not disturb areas that were previously analyzed in the adopted MND for potential archeological resources. The Proposed Project would develop the buildings on the site after completion of mass grading. While construction of the Proposed Project would require grading of approximately 4.3 acres of the greater 5.35-acre Project site to a maximum depth of 4 feet, this would be within the area graded for the Approved Project and that the adopted MND determined has a low potential for subsurface cultural resources. The adopted MND also determined that the topography of the site limits the potential for previous human habitation; and thus, limits potential for archaeological resources. Prior mass grading of the site under the approved grading permit further reduces the potential for archaeological resources to be on site during construction of the Proposed Project. No new information has come to light since approval of the Approved Project and adoption of the adopted MND to change these determinations. Therefore, consistent with the adopted MND determination,

potential impacts related to historical/archaeological resources would be less than significant, and no mitigation is required.

No new or substantially greater impacts would occur with implementation of the Proposed Project when compared to those identified in the previously adopted MND. The impacts related to the Proposed Project are consistent with the impacts identified in the previously adopted MND and the level of impact (less than significant impact) remains unchanged.

Conclusion

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

Mitigation Measures

No mitigation measures for historical resources (archaeology) were included in the adopted MND, and no new mitigation measures are required for the Proposed Project.

Human Health/Public Safety/Hazardous Materials

Approved Project - 2008 Nancy Ridge Business Park

The adopted MND determined that the Project site is not on a list of hazardous material sites, and the Approved Project would not result in any type of health hazard. No hazardous materials would be stored on-site. The Approved Project did not include the routine transport, use or disposal of hazardous materials, and the adopted MND determined that the Approved Project would not result in impairment/interference with an adopted emergency response/evacuation plan. No mitigation measures related to human health, public safety, or hazardous materials were included in the adopted MND.

Proposed Project

Construction. The Project site is still not included on a list of hazardous material sites. The Proposed Project's construction activities would involve the transport, use, and disposal of hazardous materials such as paints, solvents, oils, grease, and caulking. In addition, hazardous materials such as gasoline, diesel fuel, oil, and grease would be needed for fueling and servicing construction equipment on the site. However, these types of materials are not considered acutely hazardous, and all storage, handling, use, and disposal of these materials are regulated by federal and state requirements, which the construction activities are required to strictly adhere to. These regulations include: the federal Occupational Safety and Health Act and Hazardous Materials Transportation Act; Title 8 of the California Code of Regulations (CalOSHA), and the state Unified Hazardous Waste and Hazardous Materials Management Regulatory Program. Adherence to these requirements related to

containment, use, clean up, and disposal of hazardous materials that were adopted to protect the environment would reduce the potential for impacts. As a result, impacts related to hazardous materials during construction would remain less than significant.

During construction activities equipment and supply staging and storage would occur within the Project site but would not restrict access of emergency vehicles to the Project site or other areas along Nancy Ridge Drive. During construction of the driveway and utility connections, Nancy Ridge Drive would remain open to ensure ongoing adequate emergency access. Thus, impacts related to interference with an adopted emergency response or evacuation plan during construction activities would remain less than significant. No new or substantially more severe impacts associated with hazardous materials during the construction phases would occur.

Operation. The Proposed Project proposes office and light industrial uses, which could potentially include warehouse and distribution, assembly, and similar operations that generally use limited hazardous materials, such as: cleaning agents, paints, pesticides, batteries, and aerosol cans. Normal routine use of these products would not result in a significant hazard to residents or workers in the vicinity of the site.

In addition, should any future business that occupies one of the proposed buildings handle acutely hazardous materials (as defined in Section 25500 of California Health and Safety Code, Division 20, Chapter 6.95), the business would be required to obtain a permit from the County of San Diego Department of Environmental Health and Quality. This permitting procedure ensures the safe handling and storage of such acutely hazardous materials through specific requirements identified based on the tenant, type of use, and types of materials to be handled to ensure appropriate measures are implemented to protect the environment.

If a future project tenant requires the handling or storage of a volume greater than 500 pounds of solid, 55 gallons of liquid, or 200 cubic feet of gaseous hazardous material, it is required by AB 2185 to also file a Hazardous Materials Business Emergency Plan with the County Department of Environmental Health and Quality. A Hazardous Materials Business Emergency Plan is a written set of procedures and information created to help minimize the effects and extent of a release or threatened release of a hazardous material. The intent of the Hazardous Materials Business Emergency Plan is to satisfy federal and state right-to-know laws and to provide detailed information for use by emergency responders. Such businesses are also required to comply with California's Hazardous Materials Release Response Plans and Inventory Law, which requires immediate reporting to the County Department of Environmental Health and Quality and the State Office of Emergency Services regarding any release or threatened release of a hazardous material, regardless of the amount handled by the business.

Therefore, if future businesses that use or store hazardous materials occupy the proposed buildings, the business owners and operators would be required to comply with all applicable federal, state, and local regulations, as permitted by the County Department of Environmental Health and Quality to ensure proper use, storage, and disposal of hazardous substances. Overall, operation of the Proposed Project would result in a less than significant

hazard to the public or the environment related to transport, use, or disposal of hazardous materials. No new or substantially more severe impacts than those previously disclosed in the adopted MND would occur.

Also, operation of the Proposed Project would not result in a physical interference with an emergency response evacuation. Direct access to the Project site would be provided from Nancy Ridge Drive, and the Proposed Project is required to design and construct internal access and provide fire suppression facilities (e.g., hydrants and sprinklers) in conformance with the City Municipal Code and the Fire Department prior to approval to ensure adequate emergency access pursuant to the requirements in Section 503 of the California Fire Code (Title 24, California Code of Regulations, Part 9) and the Fire Code included per Municipal Code Section 55.0101. As a result, the Proposed Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, and impacts would remain less than significant.

No new or substantially greater impacts would occur with implementation of the Proposed Project when compared to those identified in the previously adopted MND. The impacts related to the Proposed Project are consistent with the impacts identified in the previously adopted MND and the level of impact (less than significant impact) remains unchanged.

Conclusion

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

Mitigation Measures

No mitigation measures for human health/public safety/hazardous materials were included in the adopted MND, and no new mitigation measures are required for the Proposed Project.

Hydrology and Water Quality

Approved Project – 2008 Nancy Ridge Business Park

The adopted MND determined that the Project site is located within the Miramar Reservoir Hydrologic Area (906.10) of the Penasquitos Hydrologic Unit (906). The adopted MND describes that the Approved Project would have a minimal impact on water quality as the pad areas would be capped with 4 inches of Class 2 base material for some low level absorption and filtration of pollutants. Runoff from the site would be directed to the graded pad areas, and primary filtering of storm water runoff would be achieved through catch basins on each pad level equipped with filter, which would be discharged through rip rap dissipators to the canyon area below the site. The adopted MND determined that the site design and source

control BMPs would reduce the potential source of pollutants and volume of runoff to the maximum extent practicable.

The adopted MND also determined that the Approved Project would be required to incorporate construction and post-construction BMPs to comply with Chapter 14, Article 2, Division 1 (Grading Regulations) and that development of the site would be required to comply with all requirements of the State Water Resources Control Board (SWRCB) Order No. 9008 and the Municipal Storm Water Permit, Order No. 2001-01, Waste Discharge Requirements for Discharges of Storm Water Runoff Associated with Construction Activity. A Storm Water Pollution Prevention Program (SWPPP) and Monitoring Program Plan would be implemented during grading activities. The adopted MND determined that compliance with the standards would preclude direct, indirect, and cumulatively considerable impacts to water quality and hydrology resulting. No mitigation measures related to hydrology and water quality were included in the adopted MND.

Proposed Project

Construction. Construction of the Proposed Project would require grading and excavation of soils, which would loosen sediment, and then have the potential to mix with surface water runoff and degrade water quality. Pollutants of concern during construction include sediments, trash, petroleum products, concrete waste (dry and wet), sanitary waste, and chemicals. During construction activities, excavated soil would be exposed, and there would be an increased potential for soil erosion and transport of sediment downstream compared to existing conditions. During a storm event, soil erosion could occur at an accelerated rate. In addition, construction-related pollutants, such as chemicals, liquid, and petroleum products (e.g., paints, solvents, and fuels), and concrete-related waste, could be spilled, leaked, or transported via stormwater runoff into adjacent drainages and into downstream receiving waters.

As with the Approved Project, potential water quality impacts during construction of the Proposed Project would be prevented through implementation of a SWPPP that is required to identify and address all potential sources of pollution that are reasonably expected to affect the quality of storm water discharges from the construction site. The SWPPP would include construction BMPs such as:

- Prompt revegetation of proposed landscaped areas;
- Perimeter gravel bags or silt fences to prevent off-site transport of sediment;
- Storm drain inlet protection (filter fabric gravel bags and straw wattles), with gravel bag check dams within paved roadways;
- Regular sprinkling of exposed soils to control dust during construction and soil binders for forecasted wind storms;
- Specifications for construction waste handling and disposal;
- Contained equipment wash-out and vehicle maintenance areas;
- Erosion control measures including soil binders, hydro mulch, geotextiles, and hydro seeding of disturbed areas ahead of forecasted storms;
- Construction of stabilized construction entry/exits to prevent trucks from tracking sediment on City roadways;
- Construction timing to minimize soil exposure to storm events; and

- Training of subcontractors on general site housekeeping.

Adherence to the existing requirements and implementation of the appropriate BMPs through the City's construction permitting process, would ensure that the Proposed Project would not violate any water quality standards or waste discharge requirements, potential water quality degradation associated with construction activities would be minimized, and impacts would remain less than significant.

Operation. The Proposed Project would operate industrial warehouse uses, which would introduce the potential for pollutants such as, chemicals from cleaners, pesticides and sediment from landscaping, trash and debris, and oil and grease from vehicles and trucks. These pollutants could potentially discharge into surface waters and result in degradation of water quality. However, the Proposed Project would be required to incorporate a Storm Water Quality Management Plan (SWQMP) with post-construction site design, source control, and treatment control BMPs, as required by Municipal Code Section 43.0301. The site design would minimize impervious surfaces and provide infiltration of runoff into landscaped areas.

The source control BMPs would minimize the introduction of pollutants that may result in water quality impacts; and treatment control BMPs that would treat stormwater runoff. The Proposed Project would install an onsite storm drain system that would convey runoff to the Modular Wetland System, an underground storage and drainage system that would be installed by the Approved Project.

With implementation of the operational source and treatment control BMPs that are verified by the City during the permitting and approval process, potential pollutants would be reduced to the maximum extent feasible, and implementation of the Proposed Project would not substantially impact hydrology or degrade water quality. Therefore, impacts would remain less than significant.

No new or substantially greater impacts would occur with implementation of the Proposed Project when compared to those identified in the previously adopted MND. The impacts related to the Proposed Project are consistent with the impacts identified in the previously adopted MND and the level of impact (less than significant impact) remains unchanged.

Conclusion

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

Mitigation Measures

No mitigation measures for hydrology and water quality were included in the adopted MND, and no new mitigation measures are required for the Proposed Project.

Land Use and Planning

Approved Project – 2008 Nancy Ridge Business Park

The adopted MND determined that the Mira Mesa Community Plan (MMCP) designates the Project site for Light Industrial and Open Space land uses. Also, the Project site is located partially within and adjacent to the MHPA. Therefore, the Project would be required to comply with the MHPA Land Use Adjacency Guidelines (Section 1.4.3) of the MSCP Subarea Plan. Potential indirect impacts to the MHPA could result from lighting, drainage, toxins, invasive plant species, noise, barriers and brush management as a result of construction and operation. Thus, the adopted MND describes that all lighting would be directed away from off-site areas and shielded, and BMPs would control and treat drainage. The adopted MND determined that consistency with the MHPA Land Use Adjacency Guidelines, as included as mitigation, would reduce potential land use related impacts to a less than significant level.

The adopted MND determined that the only sensitive species with the potential to occur on-site is the Coastal California gnatcatcher, which is a MSCP Covered species, a federal threatened species, and a state species of concern. Coastal California gnatcatchers were observed in the northeast corner of the Project site, outside of the development area. Due to the potential for construction-related noise impacts to occur during the gnatcatcher's breeding season (March 1-August 15), the MND included mitigation to require a protocol survey to determine the presence/absence of gnatcatchers on-site or within adjacent MHPA lands prior to construction activities during the gnatcatcher's breeding season. If gnatcatchers are present and construction noise would exceed 60 dB(a) hourly, the MND mitigation measures require sound mitigation (e.g., walls or berms) to reduce noise impacts to below a level of significance.

Also, to remove MHP areas from the Project site and provide for additional conservation lands, a MHP Boundary Line Adjustment (BLA) was approved by the California Department of Fish and Wildlife and the U.S. Department of Fish and Wildlife Service, which removed approximately 3.66 acres of sensitive habitat from the MHPA within the development area, and added approximately 8.02 acres of MHPA habitat to an approved City conservation easement that resulted in an increase of approximately 4.36 acres of conservation area.

Proposed Project

The Project site remains designated for Light Industrial land uses and is still located within the Mira Mesa Community Plan. The Mira Mesa Community Plan describes that the Light Industrial designation is intended for manufacturing, storage, warehousing, distribution, and similar uses, which is consistent with the proposed buildings. In addition, the Proposed Project would be consistent with the IL-2-1 zoning standards that are applicable to the Project site. Together, the four proposed buildings would total 89,750 square feet on the 5.35-acre site, which would result in a FAR of 0.39, which is less than the allowable FAR of 2.0 in the IL-2-1 zone. Therefore, like the Approved Project, the Proposed Project is consistent with the General Plan land use and zoning designations of the site.

As determined in adopted MND, the Project site remains located adjacent to the MHPA. Therefore, like the Approved Project, the Proposed Project would be required to comply with the MHPA Land Use Adjacency Guidelines (Section 1.4.3) of the MSCP Subarea Plan via adopted MND Mitigation Measure B.2, which would ensure that impacts would remain less than significant.

As with the Approved Project, the site would be graded prior to construction of the Proposed Project, and areas adjacent to the site contain habitat that may be used by gnatcatchers. Thus, adopted MND Mitigation Measure B.3 would be implemented if grading or construction begins during the gnatcatcher breeding season (between March 1 and August 1) to determine the presence/absence of gnatcatcher and implement appropriate buffers, if required. Consistent with the findings of the adopted MND, impacts would remain less than significant with implementation of the adopted MND mitigation measures; no new mitigation is required.

As described previously, the MHP BLA was previously approved, which resulted in an increase of approximately 4.36 acres of area in a City conservation easement. Adopted MND Mitigation Measure B.1, as listed below in Section VI, has therefore been previously completed and is not applicable to the Proposed Project.

Consistent with the findings of the MND, impacts would remain less than significant with implementation of the mitigation measures previously identified. No new or additional land use and planning related impacts would occur, and no new mitigation is required.

No new or substantially greater impacts would occur with implementation of the Proposed Project when compared to those identified in the previously adopted MND. The impacts related to the Proposed Project are consistent with the impacts identified in the previously adopted MND and the level of impact (less than significant impact with mitigation incorporated) remains unchanged.

Conclusion

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

Mitigation Measures

Mitigation Measures B.2 and B.3, as detailed below, are applicable to the Proposed Project.

Noise

Approved Project - 2008 Nancy Ridge Business Park

The adopted MND did not identify any significant impacts related to noise. No mitigation measures related to noise were included in the adopted MND.

Proposed Project

The Project site is zoned as IL-2-1 (Industrial-Light) and within an area that is developed with light industrial uses. No residential land uses, or other noise sensitive receptors, are located in the vicinity of the Project site.

Construction. Proposed Project construction noise would be generated by diesel engine-driven construction equipment used for site preparation and grading, building construction, loading, unloading, and placing materials and paving. Construction noise is regulated by Section 59.5.0404 of the City's Noise Abatement and Control Ordinance states that:

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

Construction would be restricted to between the hours of 7:00 a.m. and 7:00 p.m., and construction noise levels would not exceed a 12-hour equivalent noise level of 75 dB(A) Leq as assessed at or beyond the property line of a property zoned residential, given that there are no properties zones residential in the vicinity of the Project site.

Specifically, the hourly average noise levels from the grading phase of construction would be 82 dB(A) Leq at 50 feet from the center of construction activity when assessing the loudest pieces of equipment working simultaneously. This noise level would attenuate to 63 dB(A) Leq at 450 feet (SD 2021). There are no residential uses within 450 feet from the site (SD 2021). Therefore, as with the Approved Project, construction noise levels associated with the Proposed Project would not exceed 75 dB(A) Leq at nearest residential use, and impacts related to construction noise would not occur.

Operation. The City Noise Ordinance (SDMC Section 59.5.0401) sets limits for noise generation, as measured at the property line. The applicable noise standard in the IL-2-1 (Industrial-Light) zone is 75 dBA Leq. Operational noise would be generated by heating, ventilation, and air conditioning (HVAC) units. Each building is assumed to use typical rooftop commercial HVAC units (such as a Carrier Centurion Model 50 PG03-12 with a sound rating of 80 dBA sound power) that is shielded by roof parapet walls around the roof of the

building, as required, and attenuated by the distance of approximately 125 feet to the property line would not exceed the 75 dBA Leq noise threshold for the IL-2-1 zoned area. Therefore, noise impacts related to HVAC units would be less than significant.

The Proposed Project includes 12 truck loading docks. The primary noise associated with loading dock activity is backup alarms that are approximately 66.2 dBA, which would not exceed City Municipal Code standard of 75 dBA Leq. Therefore, noise impacts from the Proposed loading docks would be less than significant. Overall, potential noise impacts related to operation of the proposed light industrial buildings would remain less than significant.

No new or substantially greater impacts would occur with implementation of the Proposed Project when compared to those identified in the previously adopted MND. The impacts related to the Proposed Project are consistent with the impacts identified in the previously adopted MND and the level of impact (less than significant impact) remains unchanged.

Conclusion

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

Mitigation Measures

No mitigation measures for noise were included in the adopted MND, and no new mitigation measures are required for the Proposed Project.

Paleontological Resources

Approved Project - 2008 Nancy Ridge Business Park

The adopted MND determined that the Project site is underlain by Ardath Shale (Tm), Scripps Formation (Tsd), and Stadium Conglomerate (Tst), which have a high sensitivity rating for potential paleontological fossil resources. According to the City of San Diego Significance Determination Thresholds, projects underlain by high sensitivity formations require paleontological monitoring when grading quantities exceed 1,000 cubic yards and have a cut depth greater than 10 feet. The MND determined that the Approved Project would construct two levels of graded pads, which would require approximately 58,000 cubic yards of cut with a maximum cut depth of 34 feet, which is in excess of the City's threshold of 1,000 cubic yards or 10 feet of excavation depth for paleontological monitoring. Therefore, mitigation measures for paleontological monitoring during grading activities were included in the adopted MND to reduce potential impacts to paleontological resources to a less than significant level.

Proposed Project

The Geotechnical Investigation prepared for the Proposed Project confirms the prior adopted MND's finding that Tertiary-age Scripps Formation (Tsd) was identified in exploratory boring and trenches on the site, and states that Scripps Formation is exposed along the ridgelines and exists onsite beneath the previously placed fill and alluvium. The Scripps Formation at higher elevations consists of very dense to dense, light yellowish brown to reddish brown, silty, fine- to medium-grained sandstone, interbedded with siltstone layers. At lower elevations, the material transitions into yellowish to light brown conglomerate containing cobbles up to 8 inches in diameter.

According to the City's Significance Thresholds for Paleontological Resources, the Scripps Formation has a high sensitivity rating; and pursuant to the City thresholds, there would be a significant impact if grading exceeds 1,000 cubic yards or 10 feet of depth. The Project site would be mass graded by the Approved Project prior to implementation of the Proposed Project. In addition to the cut depth of 34 feet, the Approved Project includes a maximum fill depth of 36 feet with a net import of 21,500 cubic yards of fill material.

Construction of the proposed buildings by the Proposed Project would only require grading to a maximum depth of 4-feet to install the building foundations and infrastructure, which would not meet or exceed the City's 10-foot depth threshold for paleontological monitoring. Therefore, based on the City's thresholds of significance, paleontological monitoring for the Proposed Project is not required. In addition, the 4 feet of excavation and 4,689 cubic yards of cut that is part of the Proposed Project, is within the fill material that will be installed as part of the Approved Project. Thus, no native undisturbed soils would be involved in grading for the Proposed Project. As a result, impacts would remain less than significant.

No new or substantially greater impacts would occur with implementation of the Proposed Project when compared to those identified in the previously adopted MND. The impacts related to the Proposed Project would be less than those identified in the previously adopted MND, as no mitigation is required.

Conclusion

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

Mitigation Measures

Mitigation Measure D, as detailed below, was included in the adopted MND to reduce potential impacts related to paleontological resources. However, this measure is not applicable to the Proposed Project, and no new mitigation measures are required, as the Proposed Project would not exceed the City's threshold.

Population and Housing

Approved Project - 2008 Nancy Ridge Business Park

The adopted MND determined that the Approved Project would not induce substantial population growth, would not displace housing, and would not alter the planned location, distribution, density, or growth rate of the population within the City of San Diego or surrounding areas. No mitigation measures related to population and housing were included in the adopted MND.

Proposed Project

The Project site is in the IL-2-1 (Industrial-Light) zone of the Mira Mesa Community Plan, which allows light industrial development, such as the Proposed Project, up to a development intensity of a 2.0 FAR. The proposed buildings would total 89,750 square feet on the 5.35-acre site, which would result in a FAR of 0.39, which is less than a FAR of 2.0; and therefore, would not exceed the planned development intensity of the site. Thus, the Proposed Project would be consistent with the growth anticipated by the General Plan. In addition, the IL-2-1 zone does not provide for housing. The site is undeveloped; and therefore, the Proposed Project would not result in displacement of housing. Consistent with the Approved Project, the Proposed Project would not result in impacts related to population and housing.

No new or substantially greater impacts would occur with implementation of the Proposed Project when compared to those identified in the previously adopted MND. The impacts related to the Proposed Project are consistent with the impacts identified in the previously adopted MND and the level of impact (no impact) remains unchanged.

Conclusion

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

Mitigation Measures

No mitigation measures for population and housing were included in the adopted MND, and no new mitigation measures are required for the Proposed Project.

Public Services and Recreational Resources

Approved Project - 2008 Nancy Ridge Business Park

The adopted MND determined that the Approved Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services. No mitigation measures related to public services and recreational resources were included in the adopted MND.

Proposed Project

Fire Protection. The City's thresholds of significance state that a project could result in significant fire protection services if it is located in a brush fire hazard area, hillside, or an area with inadequate fire hydrant services or street access; it involves the use, manufacture or storage of toxic, readily-combustible, or otherwise hazardous materials; its location would not provide for adequate San Diego Fire Department (SDFD) access as determined by Fire and Life Safety staff to not be in conformance with the California Fire Code and Fire and Hazard Prevention Services Policy A-00-1; or if it would substantially affect Fire-Rescue response times (i.e., increase the existing response times in the project area).

The Project site is currently developed and located in a developed area where fire protection services are already provided. The San Diego Fire-Rescue Department Station 41 is located 0.9 mile from the Project site. The Proposed Project would be constructed per applicable California Building and Fire Codes and would comply with City Municipal Code requirements (Chapter 5, Article 5) and standard City procedures that include: San Diego Fire-Rescue Department approval of development plans (fire hydrant spacing, emergency vehicle access, and brush management), access to fire hydrants, and inspection of facilities prior to operation. Development would also comply with Municipal Code regulations specific to wildfire resistant construction and development in areas near natural vegetation (Chapter 14, Article 5). Therefore, the Proposed Project would not adversely affect existing levels of fire protection services to the area, substantially increase the need for new fire department staff or new facilities or require the construction of new or expanded governmental facilities. Consistent with the MND, impacts to fire protection would be less than significant.

Police Protection. The Project site is within a developed area of San Diego where police protection services are already provided. The San Diego Police Department Northwestern Division provides law enforcement services in the Project area. Northwestern Division serves an area of 41.6 square miles. The Northwestern Division Police Station is located at 12592 El Camino Real, which is approximately 7 miles from the Project site.

The Proposed Project involves the construction of industrial buildings within an area with existing industrial uses. The Proposed Project would include security lighting and other security measures to reduce the potential for crime, which would be reviewed by the City during the permitting process to ensure safety. The limited development by the Proposed

Project would not adversely affect existing levels of police protection services to the area and would not require the construction of new or expanded governmental facilities. Consistent with the MND, impacts to police protection would be less than significant.

Schools, Parks, Recreation, and Other Public Facilities. The Proposed Project involves the construction of an industrial building and would not include construction of future housing or induce growth that could increase demand for schools, parks, recreation, or other public facilities in the area. Also, the Project site is located in a developed area where public services are already provided. The site is planned for light industrial uses by the General Plan, Community Plan, and zoning designation. Due to the existence of existing public services in the area, and limited development involved, the Proposed Project would not adversely affect existing levels of facilities to the area and would not require the construction of new or expanded service-related facilities.

No new or substantially greater impacts would occur with implementation of the Proposed Project when compared to those identified in the previously adopted MND. The impacts related to the Proposed Project are consistent with the impacts identified in the previously adopted MND and the level of impact (less than significant impact) remains unchanged.

Conclusion

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

Mitigation Measures

No mitigation measures for public services and recreational resources were included in the adopted MND, and no new mitigation measures are required for the Proposed Project.

Transportation/Traffic

Approved Project - 2008 Nancy Ridge Business Park

The adopted MND determined that the Approved Project would not result in an increase in traffic generation in excess of the Mira Mesa Community Plan allocation, or an increase in traffic that is substantial in relation to the existing traffic load of the street system, and no hazards related to traffic would occur from the Approved Project. No mitigation measures related to transportation and traffic were included in the adopted MND.

Proposed Project

Traffic

Traffic Threshold

The Transportation Impact Study Manual (TISM) (1998), relied upon in the 2008 MND, states that the acceptable level of service standard for roadways and intersections in San Diego is Level of Service (LOS) D. However, for undeveloped locations, the goal is to achieve a LOS C. The allowable increase due to project impacts for intersections as per the TISM is shown in Table T-1.

Table T-1: Traffic Thresholds of Significance

LEVEL OF SERVICE WITH PROJECT	ALLOWABLE INCREASE/DECREASE DUE TO PROJECT IMPACTS*		
	INTERSECTIONS	ROADWAY SECTIONS	
	DELAY (SEC)	V/C	SPEED (MPH)
A	N/A	0.10	5
B	6	0.06	3
C	4	0.04	2
D**	2	0.02	1
E**	2	0.02	1
F**	2	0.02	1

NOTES:

* If a proposed project's impact exceed the values shown in the table, then the impacts are deemed "significant." The project applicant shall identify "feasible mitigations" to bring the facility back to the level previously held by the facility prior to the project's traffic impacts.

** The acceptable level of service standard for roadways and intersections in San Diego is level of service D. However, for undeveloped locations, the goal is to achieve a level of service C.

KEY: DELAY = Average stopped delay per vehicle measured in seconds
V/C = Volume to Capacity Ratio [capacity at level of service E should be used (Use Table 1.)]
SPEED = Arterial speed measured in miles per hour
N/A = Not Applicable

Traffic Study Area and Existing Conditions

To evaluate potential impacts related to traffic, a Traffic Impact Analysis (TIA) was prepared and included the following two intersections:

1. Nancy Ridge Drive/Carroll Canyon Road (Signalized)
2. Project Driveway/Nancy Ridge Drive (Two-way Stop Controlled)

Traffic counts at the intersections were provided by the City of San Diego. As the counts were dated October 25, 2018, a factor of 1% growth rate per year was applied to escalate the 2018 counts to 2021 volumes. The 2021 AM and PM peak hour traffic volumes are shown Table T-2, which identifies that the intersection of Nancy Ridge Drive and Carroll Canyon Road operates at a satisfactory LOS B during both peak hours.

Table T-2: Existing AM and PM Peak Hour Levels of Service

Intersection	Traffic Control	Existing Conditions			
		AM Peak Hour		PM Peak Hour	
		Delay ¹	LOS ²	Delay ¹	LOS ²
1. Nancy Ridge Dr/Carroll Canyon Rd	Signal	13.9	B	12.4	B
2. Project Dwy/Carroll Canyon Rd	TWSC	-	-	-	-

Source: TIA, 2021

Trip Generation

The trip generation of the Proposed Project was developed using the San Diego Land Development Code, Trip Generation Manual (2003) vehicle trip generation rate for warehouse. The Proposed Project trip generation is shown in Table T-3. The Proposed Project is estimated to generate approximately 449 net daily trips including 68 net trips during the AM peak hour and 72 net trips during the PM peak hour.

Table T-3: Proposed Project Trip Generation

			AM Peak Hour			PM Peak Hour		
Land Use	Units	Daily	In	Out	Total	In	Out	Total
<u>Trip Rates</u>								
Warehousing ¹	TSF	5.00	0.53	0.23	0.75	0.32	0.48	0.80
<u>Project Trip Generation</u>								
Warehouse ^{1,2}	89,750 TSF	449	47	21	68	29	43	72
Source: TIA, 2021								
TSF = Thousand Square Feet								
¹ Trip rates from the City of San Diego Trip Generation Manual (2003). Land Use - Warehousing.								
² Warehouse 1 comprises 24,300 SF, Warehouse 2 comprises 20,850 SF, Warehouse 3 comprises 17,850 SF, and Warehouse 4 comprises 26,750 SF.								

Existing Plus Project Impacts

Existing plus Project traffic volumes were determined by adding the Proposed Project trips to the 2021 traffic volumes and an intersection operations analysis was conducted. As shown in Table T-3, both study intersections are forecast to operate at satisfactory LOS B during both peak hours of the existing plus Project condition, which would not exceed the threshold. Thus, impacts would be less than significant in this condition.

Table T-4: Existing Plus Project Levels Of Service

Intersection	Traffic Control	Existing plus Project Conditions			
		AM Peak Hour		PM Peak Hour	
		Delay	LOS	Delay	LOS
1. Nancy Ridge Dr/Carroll Canyon Rd	Signal	14.5	B	12.7	B
2. Project Dwy/Carroll Canyon Rd	TWSC	12.1	B	11.6	B

Source: TIA, 2021

Existing Plus Project Impacts

Near-term plus Proposed Project traffic volumes were determined by adding the Proposed Project trips to the near-term conditions. Table T-5 shows the near-term plus Project AM and PM peak hour levels of service at study intersections, which show that both study intersections would operate at satisfactory LOS B during both peak hours with the addition of Project traffic in the near term, which would not exceed the threshold. Thus, impacts would be less than significant. Thus, consistent with the Approved Project, impacts related to traffic would be less than significant, and no mitigation measures are required.

Table T-5: Near Term Plus Project Levels Of Service

Intersection	Traffic Control	Near-Term plus Project Condition			
		AM Peak Hour		PM Peak Hour	
		Delay	LOS	Delay	LOS
1. Nancy Ridge Dr/Carroll Canyon Rd	Signal	14.8	B	12.8	B
2. Project Dwy/Carroll Canyon Rd	TWSC	12.1	B	11.7	B

Source: TIA, 2021

Traffic Hazards. The Proposed Project's design would be reviewed by the City during the plan check and permitting process; thus, the geometric design features of the Proposed Project would not result in increased hazards. Access to the Project site would be via one 30-foot-wide driveway along Nancy Ridge Drive and a 40-foot-wide access road that would be compliance with the City's design standards to provide for adequate turning for passenger cars, fire trucks, and delivery trucks.

Additionally, the Project site and Nancy Ridge Drive do not include any visual obstructions that would block sight distance at the driveway or that would prohibit full access in, and out of, the development area. Thus, motorists entering and exiting the Project site would be able to do so comfortably, safely, and without undue congestion. As such, Project access and circulation would be adequate, and impacts related to hazardous design features would be less than significant.

No new or substantially greater impacts would occur with implementation of the Proposed Project when compared to those identified in the previously adopted MND. The impacts related to the Proposed Project are consistent with the impacts identified in the previously adopted MND and the level of impact (less than significant impact) remains unchanged.

Conclusion

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

Mitigation Measures

No mitigation measures for transportation/traffic were included in the adopted MND, and no new mitigation measures are required for the Proposed Project.

Utilities and Water Conservation

Approved Project - 2008 Nancy Ridge Business Park

The adopted MND determined that the Approved Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered utility facilities or water resources. The MND determined that the existing facilities that are adjacent to the Project site would not be affected. The MND also determined that the Approved Project would not require excessive amounts of water supply and that drought tolerant landscaping would be installed. No mitigation measures related to utilities and water conservation were included in the adopted MND.

Proposed Project

The Proposed Project would develop light industrial uses that are consistent with the land use and zoning designations identified in the Mira Mesa Community Plan. As described previously, the IL-2 -1 (Industrial-Light) zone allows up to a FAR of 2.0, and the Proposed Project would result in a much lower FAR of 0.39. Consequently, the Proposed Project would be within the anticipated growth of the area. The Proposed Project would install new utility infrastructure that would connect to the existing 6-inch recycled water line, 12-inch domestic water line, 4-inch sewer lateral, within the Nancy Ridge Drive right-of-way. No new offsite infrastructure would be required to serve the Proposed Project. Therefore, the Proposed Project would not increase demand for sewer or water service within the service area that would necessitate construction of new facilities, and impacts would remain less than significant.

The City's Urban Water Management Plan (UWMP) examines the reliability of the water supply during normal, dry, and multiple drought years and provides a foundation for water supply planning. The analysis conducted for the UWMP concluded that under all scenarios that the combination of wholesale water and water supplies will be sufficient to meet water demands.

Further, to formulate the forecast demands that are used in determining the sufficiency of water supply in future years, the UWMP relies in part on land use development in accordance with general land use plans. The Proposed Project is consistent with the City's General Plan and the Mira Mesa Community Plan and within the allowable FAR. As such, water supplies to the site were assumed within the UWMP projections and adequate water supplies would be available to serve the Proposed Project and reasonably foreseeable future development during normal, dry, and multiple dry years. In addition, the Proposed Project would install drought tolerant landscaping that conforms to the City's Landscape Technical Manual and low flow plumbing fixtures pursuant to the Title 24 CalGreen standards to provide for water conservation. Therefore, impacts related to water supply and conservation would also remain less than significant.

No new or substantially greater impacts would occur with implementation of the Proposed Project when compared to those identified in the previously adopted MND. The impacts related to the Proposed Project are consistent with the impacts identified in the previously adopted MND and the level of impact (less than significant impact) remains unchanged.

Conclusion

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

Mitigation Measures

No mitigation measures for utilities and water conservation were included in the adopted MND, and no new mitigation measures are required for the Proposed Project.

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

The mitigation measures listed below were adopted as part of the adopted MND for the Approved Project. The status of each measure's implementation is also provided, and an explanation as to whether the measure remains applicable to the Proposed Project.

A. GENERAL

1. Prior to Notice to Proceed (NTP) for any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits, the Assistant Deputy Director (ADD) of the Entitlements Division shall verify that the following statement is shown on the grading and/or construction plans as a note under the heading ENVIRONMENTAL MITIGATION REQUIREMENTS: "The Nancy Ridge Business Park project is subject to a Mitigation Monitoring and Reporting Program and shall conform to the mitigation conditions as contained in the Addendum to Mitigated Negative Declaration Project No. 114358."

2. Prior to the commencement of work, a Preconstruction Meeting (Pre-con) shall be conducted and include City of San Diego's Mitigation Monitoring and Coordination (MMC) staff, Resident Engineer, Applicant, Project Paleontologist, Project Biologist, Environmental Consultants and other parties of interest.

[Status: Mitigation Measure A.1 and A.2 remain applicable to the Proposed Project. Mitigation Measure A.1 will be revised with a minor clarification as shown above in the measure in underlined text to include reference to this Addendum to the adopted MND on all grading and construction plans.]

B. LAND USE (MULTIPLE SPECIES CONSERVATION PROGRAM)

1. MHPA Boundary Line Adjustment

- a. Prior to the recordation of the first final map and/or issuance of any grading permits, the on-site adjusted MHPA (8.02 acres total) shall be conveyed to the City's MSCP Preserve through either fee title to the City, or conservation easement or covenant of easement granted in favor of the City and wildlife agencies. Conveyance of any MHPA land in fee to the City shall require approval from the Park and Recreation Department Open Space Division Deputy Director and shall exclude detention basins or other storm water control facilities, brush management areas, landscape/revegetation areas, and graded slopes.

[Status: Mitigation Measure B.1(a) was completed in 2008 and no further actions are required. Therefore, Measure B.1(a) is no longer applicable to the Proposed Project.]

2. Land Use Adjacency Guidelines

The Nancy Ridge Business Park Project site is located ~~within~~ and adjacent to the MSCP Subarea Plan's Multi-Habitat Planning Area (MHPA). Therefore, the following MHPA Land Use Adjacency Guidelines shall be made conditions of project approval:

- a. Prior to initiation of any ground disturbing activities, the project biologist shall discuss the sensitive nature of the adjacent habitat with the crew and subcontractor.
- b. Prior to the start of construction, the construction limits shall be clearly delineated by a survey crew prior to brushing, clearing, or grading. The limits of grading shall be defined with silt fencing and orange construction fencing and checked by the biological monitor before initiation of trenching activities and/or ground disturbing activities.
- c. Prior to the issuance of any construction permit, the City Manager shall review the landscape plans to ensure that no invasive non-native plant species have been proposed for areas adjacent to the MHPA.
- d. All required temporary lighting, including security lighting of the staging areas, or permanent lighting adjacent to the MHPA shall be shielded, unidirectional, low pressure sodium illumination (or similar) and directed away from preserve

areas using appropriate placement and shields.

- e. No staging/storage areas for equipment and materials shall be located within or adjacent to habitat retained in open space area. No equipment maintenance shall be conducted within or near the adjacent open space.
- f. The post-construction Best Management Practices are required to be consistent with the approved Water Quality Technical Report, to the satisfaction of the City Engineer. The project biologist shall oversee implementation of Best Management Practices as needed to prevent any significant sediment transport. Training of construction crews and field workers must be conducted to ensure that all conditions are met. All construction/grading plans shall be made available to crews in the field showing these conditions.
- g. No trash, oil, parking, or other construction related activities shall be allowed outside the established limits of grading. All construction related debris shall be removed off-site to an approved disposal facility.
- h. No invasive, non-native plant species shall be permitted on-site. The hydroseed mix used for erosion control shall only contain native species and shall only be applied under the supervision of the biologist or a landscape architect.
- i. Appropriate barriers shall be provided along the MHPA boundaries to direct public access to appropriate locations and reduce domestic animal predation.
- j. No toxic materials or water used during construction related work shall be allowed to be diverted or drained off-site, into the MHPA, during and after construction activity. The biologist shall ensure that the appropriate measures and control devices are used as needed during construction to deter any drainage toward sensitive habitat.

[Status: Mitigation Measures B.2(a) through B.2(j) remain applicable to the Proposed Project. However, Mitigation Measure B.2 will be revised with a minor clarification because the Project site is no longer located partially "within" the MHPA because the MHPA boundary line was moved as part of approval of the Approved Project.]

3. Coastal California Gnatcatcher

- A. Prior to the issuance of any grading permit, the City Manager (or appointed designee) shall verify that the Multi-Habitat Planning Area (MHPA) boundaries and the following project requirements regarding the Coastal California Gnatcatcher are shown on the construction plans:

NO CLEARING, GRUBBING, GRADING, OR OTHER CONSTRUCTION ACTIVITIES SHALL OCCUR BETWEEN MARCH 1 AND AUGUST 15, THE BREEDING SEASON OF THE COASTAL CALIFORNIA GNATCATCHER, UNTIL THE FOLLOWING REQUIREMENTS HAVE BEEN MET TO THE SATISFACTION OF THE CITY MANAGER:

1. A QUALIFIED BIOLOGIST (POSSESSING A VALID ENDANGERED SPECIES ACT SECTION 10(a)(1)(A) RECOVERY PERMIT) SHALL SURVEY THOSE HABITAT AREAS WITHIN THE MHPA THAT WOULD BE SUBJECT TO CONSTRUCTION NOISE LEVELS EXCEEDING 60 DECIBELS [dB(A)] HOURLY AVERAGE FOR THE PRESENCE OF THE COASTAL CALIFORNIA GNATCATCHER. SURVEYS FOR THE COASTAL CALIFORNIA GNATCATCHER SHALL BE CONDUCTED PURSUANT TO THE PROTOCOL SURVEY GUIDELINES ESTABLISHED BY THE U.S. FISH AND WILDLIFE SERVICE WITHIN THE BREEDING SEASON PRIOR TO THE COMMENCEMENT OF ANY CONSTRUCTION. IF GNATCATCHERS ARE PRESENT, THEN THE FOLLOWING CONDITIONS MUST BE MET:
 - a. BETWEEN MARCH 1 AND AUGUST 15, NO CLEARING, GRUBBING, OR GRADING OF OCCUPIED GNATCATCHER HABITAT SHALL BE PERMITTED. AREAS RESTRICTED FROM SUCH ACTIVITIES SHALL BE STAKED OR FENCED UNDER THE SUPERVISION OF A QUALIFIED BIOLOGIST; AND
 - b. BETWEEN MARCH 1 AND AUGUST 15, NO CONSTRUCTION ACTIVITIES SHALL OCCUR WITHIN ANY PORTION OF THE SITE WHERE CONSTRUCTION ACTIVITIES WOULD RESULT IN NOISE LEVELS EXCEEDING 60 dB(A) HOURLY AVERAGE AT THE EDGE OF OCCUPIED GNATCATCHER HABITAT. AN ANALYSIS SHOWING THAT NOISE GENERATED BY CONSTRUCTION ACTIVITIES WOULD NOT EXCEED 60 dB(A) HOURLY AVERAGE AT THE EDGE OF OCCUPIED HABITAT MUST BE COMPLETED BY A QUALIFIED ACOUSTICIAN (POSSESSING CURRENT NOISE ENGINEER LICENSE OR REGISTRATION WITH MONITORING NOISE LEVEL EXPERIENCE WITH LISTED ANIMAL SPECIES) AND APPROVED BY THE CITY MANAGER AT LEAST TWO WEEKS PRIOR TO THE COMMENCEMENT OF CONSTRUCTION ACTIVITIES. PRIOR TO THE COMMENCEMENT OF CONSTRUCTION ACTIVITIES DURING THE BREEDING SEASON, AREAS RESTRICTED FROM SUCH ACTIVITIES SHALL BE STAKED OR FENCED UNDER THE SUPERVISION OF A QUALIFIED BIOLOGIST; OR
 - c. AT LEAST TWO WEEKS PRIOR TO THE COMMENCEMENT OF CONSTRUCTION ACTIVITIES, UNDER THE DIRECTION OF A QUALIFIED ACOUSTICIAN, NOISE ATTENUATION MEASURES (e.g., BERMS, WALLS) SHALL BE IMPLEMENTED TO ENSURE THAT NOISE LEVELS RESULTING FROM CONSTRUCTION ACTIVITIES WILL NOT EXCEED 60 dB(A) HOURLY AVERAGE AT THE EDGE OF HABITAT OCCUPIED BY THE COASTAL CALIFORNIA GNATCATCHER. CONCURRENT WITH THE COMMENCEMENT OF CONSTRUCTION ACTIVITIES AND THE CONSTRUCTION OF NECESSARY NOISE ATTENUATION FACILITIES, NOISE MONITORING* SHALL BE CONDUCTED AT THE EDGE OF THE OCCUPIED HABITAT AREA TO ENSURE THAT NOISE LEVELS DO NOT

EXCEED 60 dB(A) HOURLY AVERAGE. IF THE NOISE ATTENUATION TECHNIQUES IMPLEMENTED ARE DETERMINED TO BE INADEQUATE BY THE QUALIFIED ACOUSTICIAN OR BIOLOGIST, THEN THE ASSOCIATED CONSTRUCTION ACTIVITIES SHALL CEASE UNTIL SUCH TIME THAT ADEQUATE NOISE ATTENUATION IS ACHIEVED OR UNTIL THE END OF THE BREEDING SEASON (AUGUST 16).

* Construction noise monitoring shall continue to be monitored at least twice weekly on varying days, or more frequently depending on the construction activity, to verify that noise levels at the edge of occupied habitat are maintained below 60 dB(A) hourly average or to the ambient noise level if it already exceeds 60 dB(A) hourly average. If not, other measures shall be implemented in consultation with the biologist and the City Manager, as necessary, to reduce noise levels to below 60 dB(A) hourly average or to the ambient noise level if it already exceeds 60 dB(A) hourly average. Such measures may include, but are not limited to, limitations on the placement of construction equipment and the simultaneous use of equipment.

2. IF COASTAL CALIFORNIA GNATCATCHERS ARE NOT DETECTED DURING THE PROTOCOL SURVEY, THE QUALIFIED BIOLOGIST SHALL SUBMIT SUBSTANTIAL EVIDENCE TO THE CITY MANAGER AND APPLICABLE RESOURCE AGENCIES WHICH DEMONSTRATES WHETHER OR NOT MITIGATION MEASURES SUCH AS NOISE WALLS ARE NECESSARY BETWEEN MARCH 1 AND AUGUST 15 AS FOLLOWS:

- a. IF THIS EVIDENCE INDICATES THE POTENTIAL IS HIGH FOR COASTAL CALIFORNIA GNATCATCHER TO BE PRESENT BASED ON HISTORICAL RECORDS OR SITE CONDITIONS, THEN CONDITION A.1.c SHALL BE ADHERED TO AS SPECIFIED ABOVE.
- b. IF THIS EVIDENCE CONCLUDES THAT NO IMPACTS TO THIS SPECIES ARE ANTICIPATED, NO MITIGATION MEASURES WOULD BE NECESSARY.

[Status: Mitigation Measure B.3(a) remains applicable to the Proposed Project.]

C. BIOLOGICAL RESOURCES

1. General

- A. Prior to the issuance of any grading permits and/or the first pre-construction meeting, the owner/permittee shall submit evidence to the Assistant Deputy Director (ADD) of the Entitlements Division verifying that a qualified biologist has been retained to implement the biological resources mitigation program as detailed below (see 1 through 3):
 1. At least thirty days prior to the pre-construction meeting, a letter of verification shall be submitted to the Mitigation Monitoring Coordination (MMC) section which includes the name and contact information of the Biologist and the names of all persons involved in the Biological Monitoring

of the project.

2. At least thirty days prior to the pre-construction meeting, the qualified Biologist shall verify that any special reports, maps, plans and timelines, such as but not limited to, revegetation plans, plant relocation requirements and timing, avian or other wildlife protocol surveys, impact avoidance areas or other such information has been completed and updated.
 3. The qualified biologist (project biologist) shall attend the first preconstruction meeting.
- B. The project biologist shall supervise the placement of orange construction fencing or equivalent along the limits of disturbance within and surrounding sensitive habitats, as shown on the approved Exhibit A (included herein as Figure 2). In addition, the biologist shall determine where silt fencing shall be installed, as appropriate.
- C. All construction activities (including staging areas) shall be restricted to the development area, as shown on the approved Exhibit A. The project biologist shall monitor construction activities as needed to ensure that construction activities do not encroach into biologically sensitive areas beyond the limits of disturbance, as shown on the approved Exhibit A (included herein as Figure 2).
- D. No grading or clearing activities shall occur within the area defined as Brush Management Zone (BMZ) II, as shown on the approved Exhibit A (included herein as Figure 2). Construction activities within BMZ II shall be restricted to hand crews for the purposes of brush zone management maintenance and landscape planting.

[Status: Mitigation Measure C.1 remains applicable to the Proposed Project.]

2. Mitigation for Potential Impacts to Sensitive Birds

Prior to the Issuance of Grading Permits:

- a. Prior to Notice to Proceed (NTP) for any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits, the applicant shall provide a signed letter stating that no grading or any type of habitat destruction shall take place during the typical bird nesting season (February 1 -September 15) or;
- b. The applicant's project biologist shall perform a pre-grading/pre-construction directed survey/report for active nests within 3 days of grading/construction activities to the satisfaction of EAS. If active nests of species are detected the report shall include mitigation to the satisfaction of EAS and/or the USFWS and CDFG as follows:
- c. Prior to Notice to Proceed (NTP) for any construction permits, including but

not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits, a qualified biologist shall determine the presence or absence of active or occupied nests within the project site or area adjacent which could be impacted, with written results submitted to the Assistant Deputy Director (ADD) of the Entitlements Division.

Prior to Start of Construction:

- d. If active or occupied sensitive bird nests are identified during the pre-grading survey, or are otherwise noted during the week grading is to commence (see Item 3 below), and project construction has the potential to impact nests during the breeding season (February 1 - September 15), the biologist in consultation with EAS staff shall determine an appropriate buffer (i.e. per the ESL), around the bird nesting area which shall be free from grading or construction activity. The buffer area must be identified and flagged.
- e. These restrictions, as required, shall be noted on all grading and construction plans. If active or occupied nests to be protected are located on, or adjacent to the site, weekly biological monitoring of these nests shall be conducted by the project biologist during the breeding season (February 1 through September 15) with written results submitted to the ADD of the Entitlements Division. If no active or occupied nests are discovered on, or adjacent to the project site, no further mitigation is required.

During Construction:

- f. If active or occupied nests are discovered during construction activities, the biologist shall notify the Resident Engineer (RE) and Mitigation Monitoring and Coordination Staff (MMC).
- g. The RE shall stop work in the vicinity of the nests. The qualified biologist shall mark all pertinent trees, holes, or shrubs and delineate the appropriate "no construction" buffer area per City ESL and/or the USFWS/CDFG's direction, around any nest sites, satisfactory to the ADD of the Entitlements Division. The buffer shall be maintained until the qualified biologist determines, and demonstrates in a survey report satisfactory to the ADD of the Entitlements Division that any young birds have fledged.

Post Construction:

- h. The biologist shall be responsible for ensuring that all field notes and reports have been completed, all outstanding items of concern have been resolved or noted for follow up, and that focused surveys are completed, as appropriate.
- i. Within three months following the completion of monitoring, two copies of the Final Biological Monitoring Report (even if negative) and/or evaluation report, if applicable, which describes the results, analysis, and conclusions of the Biological Monitoring Program (with appropriate graphics) shall be submitted to Mitigation Monitoring Coordination (MMC) for approval by the ADD of LDR.
- j. For any unforeseen additional biological resources impacted during

construction, the rehabilitation, revegetation, or other such follow up action plan(s) shall be included as part of the Final Biological Monitoring Report in accordance with the City of San Diego's Land Development Code, Biological Resources Guidelines (July 2002). Additional mitigation measures may also be required.

- k. This report shall address findings of active/inactive nests and any recommendations for retention of active nests, removal of inactive nests and mitigation for offsetting loss of breeding habitat.

MMC shall notify the RE of receipt of the Final Biological Monitoring Report.

[Status: Mitigation Measures C.2(a) through (k) remain applicable to the Proposed Project.]

D. PALEONTOLOGICAL RESOURCES

I. Prior to Permit Issuance

- A. Entitlements Division Plan Check
 - 1. Prior to Notice to Proceed (NTP) for any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits, but prior to the first preconstruction meeting, whichever is applicable, the Assistant Deputy Director (ADD) Environmental designee of the Entitlements Division shall verify that the requirements for Paleontological Monitoring have been noted on the appropriate construction documents.
- B. Letters of Qualification have been submitted to Assistant Deputy Director (ADD).
 - 1. The applicant shall submit a letter of verification to Mitigation Monitoring Coordination (MMC) identifying the Principal Investigator (PI) for the project and the names of all persons involved in the paleontological monitoring program, as defined in the City of San Diego Paleontology Guidelines.
 - 2. MMC will provide a letter to the applicant confirming the qualifications of the PI and all persons involved in the paleontological monitoring of the project.
 - 3. Prior to the start of work, the applicant shall obtain approval from MMC for any personnel changes associated with the monitoring program.

II. Prior to Start of Construction

- A. Verification of Records Search
 - 1. The PI shall provide verification to MMC that a site specific records search has been completed. Verification includes, but is not limited to, a copy of a confirmation letter from San Diego Natural History Museum, other institution or, if the search was in-house, a letter of verification from the PI stating that the search was completed.
 - 2. The letter shall introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities.
- B. PI Shall Attend Precon Meetings
 - 1. Prior to beginning any work that requires monitoring, the Applicant shall

arrange a Precon Meeting that shall include the PI, Construction Manager (CM) and/or Grading Contractor, Resident Engineer (RE), Building Inspector (BI), if appropriate, and MMC. The qualified paleontologist shall attend any grading/excavation related Precon Meetings to make comments and/or suggestions concerning the Paleontological Monitoring program with the Construction Manager and/or Grading Contractor.

- a. If the PI is unable to attend the Precon Meeting, the Applicant shall schedule a focused Precon Meeting with MMC, the PI, RE, CM or BI, if appropriate, prior to the start of any work that requires monitoring.

2. Identify Areas to be Monitored

Prior to the start of any work that requires monitoring, the PI shall submit a Paleontological Monitoring Exhibit (PME) based on the appropriate construction documents (reduced to 11x17) to MMC identifying the areas to be monitored including the delineation of grading/excavation limits. The PME shall be based on the results of a site specific records search as well as information regarding existing known soil conditions (native or formation).

3. When Monitoring Will Occur

- a. Prior to the start of any work, the PI shall also submit a construction schedule to MMC through the RE indicating when and where monitoring will occur.
- b. The PI may submit a detailed letter to MMC prior to the start of work or during construction requesting a modification to the monitoring program. This request shall be based on relevant information such as review of final construction documents which indicate conditions such as depth of excavation and/or site graded to bedrock, presence, or absence of fossil resources, etc., which may reduce or increase the potential for resources to be present.

III. During Construction

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

1. The monitor shall be present full-time during grading/excavation/trenching activities as identified on the PME that could result in impacts to formations with high and moderate resource sensitivity. The Construction Manager is responsible for notifying the RE, PI, and MMC of changes to any construction activities.
2. The monitor shall document field activity via the Consultant Site Visit Record (CSV). The CSV's shall be faxed by the CM to the RE the first day of monitoring, the last day of monitoring, monthly (Notification of Monitoring Completion), and in the case of ANY discoveries. The RE shall forward copies to MMC.
3. The PI may submit a detailed letter to MMC during construction requesting a modification to the monitoring program when a field condition such as trenching

activities that do not encounter formational soils as previously assumed, and/or when unique/unusual fossils are encountered, which may reduce or increase the potential for resources to be present.

B. Discovery Notification Process

1. In the event of a discovery, the Paleontological Monitor shall direct the contractor to temporarily divert trenching activities in the area of discovery and immediately notify the RE or BI, as appropriate.
2. The Monitor shall immediately notify the PI (unless Monitor is the PI) of the discovery.
3. The PI shall immediately notify MMC by phone of the discovery and shall also submit written documentation to MMC within 24 hours by fax or email with photos of the resource in context, if possible.

C. Determination of Significance

1. The PI shall evaluate the significance of the resource.
 - a. The PI shall immediately notify MMC by phone to discuss significance determination and shall also submit a letter to MMC indicating whether additional mitigation is required. The determination of significance for fossil discoveries shall be at the discretion of the PI.
 - b. If the resource is significant, the PI shall submit a Paleontological Recovery Program (PRP) and obtain written approval from MMC. Impacts to significant resources must be mitigated before ground disturbing activities in the area of discovery will be allowed to resume.
 - c. If resource is not significant (e.g., small pieces of broken common shell fragments or other scattered common fossils) the PI shall notify the RE, or BI as appropriate, that a non-significant discovery has been made. The Paleontologist shall continue to monitor the area without notification to MMC unless a significant resource is encountered.
 - d. The PI shall submit a letter to MMC indicating that fossil resources will be collected, curated, and documented in the Final Monitoring Report. The letter shall also indicate that no further work is required.

IV. Night and/or Weekend Work

A. If night and/or weekend work is included in the contract

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

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

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

c. Potentially Significant Discoveries

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

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

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

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

2. The RE, or BI, as appropriate, shall notify MMC immediately.

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

V. Post Construction

A. Preparation and Submittal of Draft Monitoring Report

1. The PI shall submit two copies of the Draft Monitoring Report (even if negative), prepared in accordance with the Paleontological Guidelines which describes the results, analysis, and conclusions of all phases of the Paleontological Monitoring Program (with appropriate graphics) to MMC for review and approval within 90 days following the completion of monitoring,

a. For significant paleontological resources encountered during monitoring, the Paleontological Recovery Program shall be included in the Draft Monitoring Report.

b. Recording Sites with the San Diego Natural History Museum

The PI shall be responsible for recording (on the appropriate forms) any significant or potentially significant fossil resources encountered during the Paleontological Monitoring Program in accordance with the City's Paleontological Guidelines, and submittal of such forms to the San Diego Natural History Museum with the Final Monitoring Report.

2. MMC shall return the Draft Monitoring Report to the PI for revision or, for preparation of the Final Report.

3. The PI shall submit revised Draft Monitoring Report to MMC for approval.

4. MMC shall provide written verification to the PI of the approved report.

5. MMC shall notify the RE or BI, as appropriate, of receipt of all Draft Monitoring Report submittals and approvals.

B. Handling of Fossil Remains

1. The PI shall be responsible for ensuring that all fossil remains collected

- are cleaned and catalogued.
- 2. The PI shall be responsible for ensuring that all fossil remains are analyzed to identify function and chronology as they relate to the geologic history of the area; that faunal material is identified as to species; and that specialty studies are completed, as appropriate.
- C. Curation of fossil remains: Deed of Gift and Acceptance Verification
 - 1. The PI shall be responsible for ensuring that all fossil remains associated with the monitoring for this project are permanently curated with an appropriate institution.
 - 2. The PI shall include the Acceptance Verification from the curation institution in the Final Monitoring Report submitted to the RE or BI and MMC.
- D. Final Monitoring Report(s)
 - 1. The PI shall submit two copies of the Final Monitoring Report to MMC (even if negative), within 90 days after notification from MMC that the draft report has been approved.
 - 2. The RE shall, in no case, issue the Notice of Completion until receiving a copy of the approved Final Monitoring Report from MMC which includes the Acceptance Verification from the curation institution.

[Status: The City's Significance Thresholds for Paleontological Resources find a significant impact only where grading exceeds 1,000 cubic yards or 10 feet of depth. Because the Proposed Project would not excavate beyond a depth of four feet, Mitigation Measures D.1 through D.4 are not applicable to the Proposed Project.]

VII. IMPACT SIGNIFICANCE

The adopted MND determined that all potentially significant impacts associated with the Approved Project would be reduced to below a level of significance through mitigation. This Addendum determined that the Proposed Project would not result in any new significant impacts, or the need for any new mitigation measures beyond those impacts and measures previously disclosed in the adopted MND.

VIII. CERTIFICATION

Copies of the addendum, the adopted MND, the Mitigation Monitoring and Reporting Program, and associated project-specific technical appendices, may be reviewed in the office of the Development Services Department, or purchased for the cost of reproduction.

Courtney Holowach for
 Jeff Szymanski, Senior Planner
 Development Services Department

6/15/2022
 Date of Final Report

Analyst: Courtney Holowach

Attachments:

Figure 1: Project Location
Figure 2: Approved Project
Figure 3: Proposed Project Site Plan

REFERENCES

EPD Solutions.

2021 Nancy Ridge Industrial Traffic Impact Analysis. October 22.

Geocon Incorporated.

2019 Geotechnical Investigation. January 3.

San Diego, City of

2016 City of San Diego CEQA Thresholds. Accessed:
https://www.sandiego.gov/sites/default/files/july_2016_ceqa_thresholds_final_0.pdf

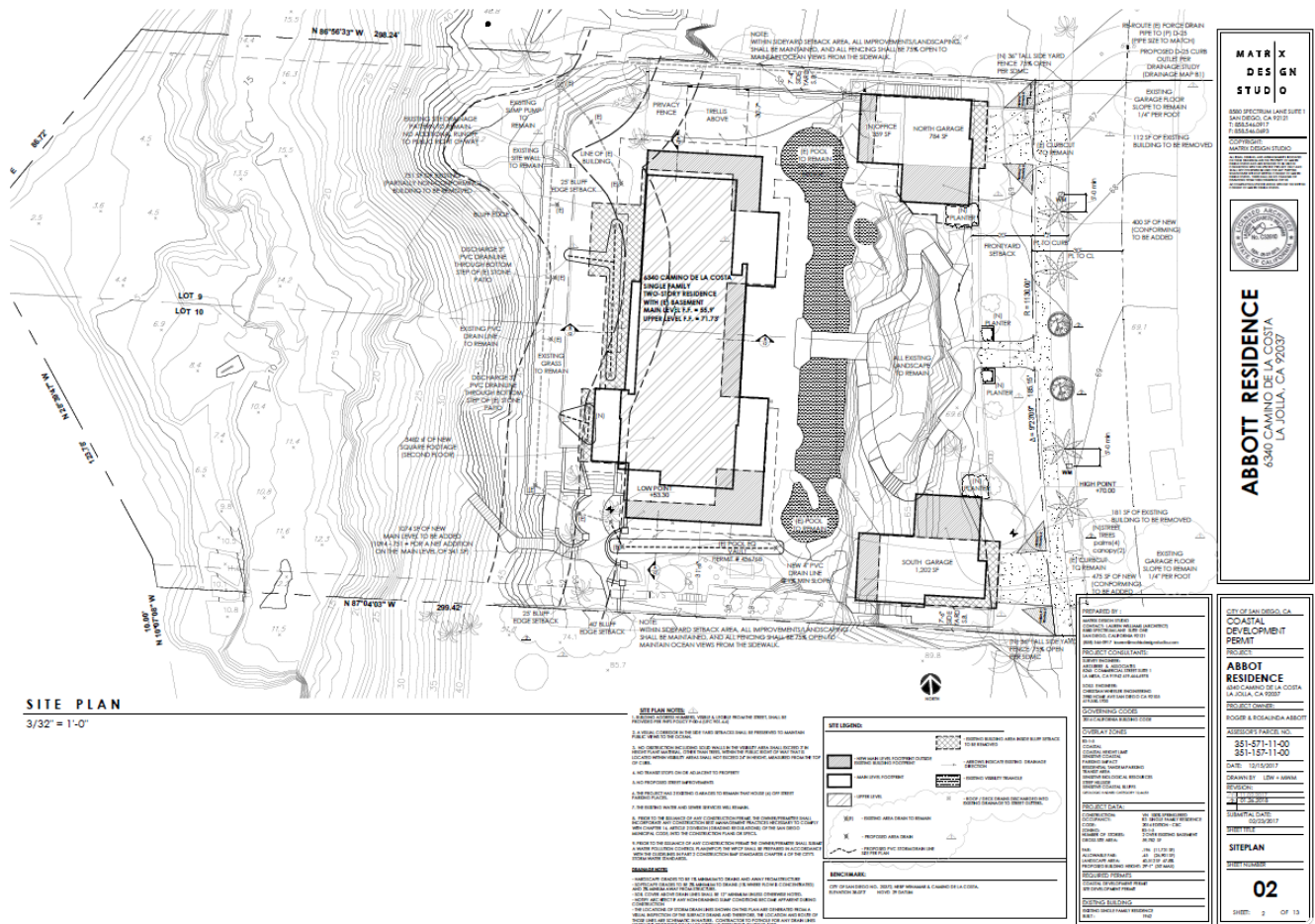
2017 City of San Diego Climate Action Plan Consistency Checklist. Accessed:
https://www.sandiego.gov/sites/default/files/dsd-climate_action_plan_checklist.pdf

2016 City of San Diego Climate Action Plan Consistency Checklist Technical Support Documentation. Accessed:
https://www.sandiego.gov/sites/default/files/cap_consistency_checklist_technical_support_document.pdf

2021 City of San Diego Addendum to EIR No. 518009 (SD 2021). Accessed:
https://www.sandiego.gov/sites/default/files/dsd_657591_-_addendum.pdf

San Diego, County of

County of San Diego Department of Environmental Health and Quality Hazardous Materials Business Plan, California Health & Safety Code, Division 20, Chapter 6.95 Requirements. Accessed:
<https://www.sandiegocounty.gov/content/sdc/deh/hazmat/hazmat.html>



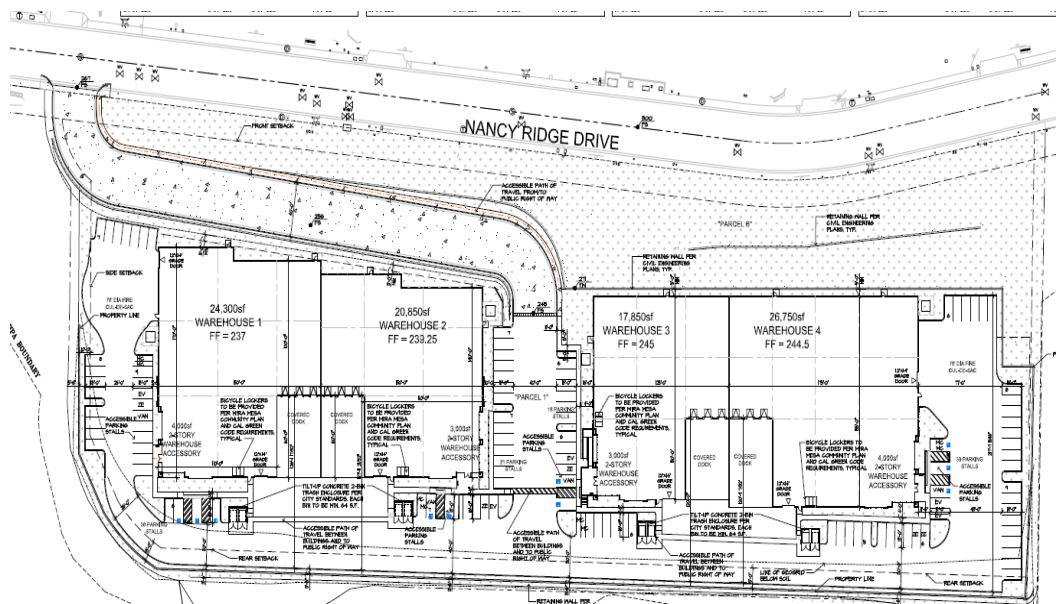
Site Plan

Abbott Residence CDP SDP/Project No. 538814

City of San Diego – Development Services Department

FIGURE

No. 2



Site Plan

Nancy Ridge TM NDP/Project No. 637151

City of San Diego – Development Services Department

FIGURE
No. 3