

THE CITY OF SAN DIEGO

## ADDENDUM PROJECT No. 393812 TO PROGRAM ENVIRONMENTAL IMPACT REPORT No. 310690 SCH No. 2015111012

SUBJECT: PACIFICA RIDGE A TENTATIVE MAP (TM), SITE DEVELOPMENT PERMIT (SDP), AND **PLANNED DEVELOPMENT PERMIT (PDP)**, to consolidate the existing three lots on the 4.35-acre project site into one lot, to allow deviations from the RM-1-1 development regulations and to develop on Environmentally Sensitive Lands (ESL) consisting of sensitive biological resources and steep hillsides. The project also proposes two deviations from zoning development regulations and ESL regulations. These deviations are related to the proposed retaining walls and development encroachment into a steep hillside and are further discussed in Section I. The project is located east of Smythe Avenue, north of Foothill Road, and west of the cul-de-sac at the end of Camino De Progresso in the San Ysidro Community Planning area. The site is subject to the RM-1-1, Residential Medium density zone, Residential Tandem Parking Overlay Zone (RTPOZ), Transit Area Overlay Zone (TAOZ), and Transit Priority Area (TPA). In addition, Multiple Species Conservation Plan (MSCP) Environmentally Sensitive Lands (ESL) - steep slopes and sensitive biology, Fire Brush Management, Very High Fire Severity, Brown Field Municipal Airport and Naval Outlying Landing Field (NOLF) Imperial Beach Airport Land Use Compatibility Plan (ALUCP) – Review Area 2, and Federal Aviation Administration (FAA) Part 77 Noticing Area zones are mapped on the site. The project is designated for Residential land uses in the City's General Plan.

(LEGAL DESCRIPTION: All portions of lots, In the City of San Diego, County of San Diego, State of California, According to the United States Government Survey, Assessor's Parcel Numbers 638-060-04, 638-060-03, 638-060-41). *Applicant*: Raintree Residential LLC

## I. PROJECT DESCRIPTION:

## A TENTATIVE MAP (TM), SITE DEVELOPMENT PERMIT (SDP), AND PLANNED DEVELOPMENT

**PERMIT (PDP).** Request for a Tentative Map (TM) to consolidate the existing three lots into one lot to construct 44 two-story, detached, residential condominium units (3-4 bedrooms) in 30-foot tall buildings located above 2-car garages. The 4.35-acre site is approximately 189,000 square feet of lot area. A Site Development Permit (SDP) is requested to deviate from the steep hillside guidelines to re-grade 100% of the steep hillside where the guidelines state that only 25% of the steep hillsides can be re-graded. A Planned Development Permit (PDP) is also requested to exceed the 10-foot retaining wall height standard and construct a 0 to 26-foot high retaining wall along Smythe Avenue property frontage and a 0 to 26-foot tall 560-foot long retaining wall along the interior subdivision

private driveway. The request to exceed the 10-foot retaining wall standard and encroach into the steep hillside requires discretionary permits subject to the Land Development Code (LDC).

Site development would include 44 two-story, detached, residential condominium units; surface parking lots; and associated landscaped open space areas (i.e., private and public) and infrastructure. The three- to four-bedroom condominiums would have a maximum height of 30 feet and would feature two-car garages. Primary site access would be via a private drive constructed to intersect with Smythe Avenue at the northwest corner of the property; secondary (emergency) access would connect the eastern portion of the site via a private drive to the existing cul-de-sac at Camino Del Progresso (where removable bollards would be installed to restrict access). Smythe Avenue would be widened and improved along the project site frontage. Surface parking and drives would be constructed internally throughout the site. Plantable retaining walls would be installed and landscaped along Smythe Avenue and adjacent to an internal private drive. A dry-well storm water treatment facility is proposed in the northwestern portion of the site near the site entrance; an underground storm water detention facility would be developed at the common open space area in the northwestern portion of the site. Approximately 32,400 square feet (SF) of common open space would be provided on site. Refuse and recycling storage would be provided within the garage of each unit.

The project site is currently undeveloped with no known existing improvements. Project implementation would require removal of existing vegetation, concrete brow ditches along the perimeter of the site, and asphalt/concrete along the edge of Smythe Avenue. The entire site would also be graded, and some offsite grading on adjacent properties is required for project implementation. Offsite grading would be performed under written agreement(s) with individual property owners. Grading is anticipated to require 67,890 cubic yards (CY) of cut at a maximum depth of 40 feet; 10,040 CY would be used as fill material. The remaining 57,950 CY of fill material would be exported off site to other construction sites nearby. The project is anticipated to be constructed over a period of 12 months. Grading would take approximately 3 months and building construction would occur over a 9-month period.

The project would include improvements to Smythe Avenue and the installation of water and sanitary sewer mains. The widening of Smythe Avenue into a modified four-lane collector street would include 2 full northbound lanes, a bike lane, curb, gutter, and non-contiguous sidewalk located within a 15-foot parkway. The Smythe Avenue improvements would extend the length of the property frontage adjacent to Smythe Avenue and transition into the existing improvements at the north and south end of the project property. A 12-inch public water main would be extended from the existing 12-inch water main in Smythe Avenue to the entrance driveway of the project site. A proposed 8-inch sanitary sewer main would be installed in Smythe Avenue, connecting the proposed subdivision with the existing sewer facility at the intersection with Foothill Road to the south.

The proposed retaining walls would be along the Smythe Avenue property frontage and along the driveway to the project site from Smythe Avenue. The proposed retaining wall along the Smythe Avenue frontage would be a plantable mechanically stabilized earth (MSE) retaining wall approximately 460 feet in length, ranging in heights from 0 to 26 feet. A 6-foot sidewalk would be constructed along this portion of Smythe Avenue as part of the proposed Smythe Avenue improvements, with 4.25 feet of landscape buffer on both sides of the sidewalk, adjacent to the MSE

retaining wall. The second retaining wall would also be a plantable MSE wall and would be located along the interior subdivision private driveway from Smythe Avenue. It would be 560 feet in length, and range in height from 0 to 26 feet.

The proposed subdivision would have a privately maintained water quality treatment and detention facility to handle the project's storm water run-off treatment needs. The project proposes common landscaped open space areas that would be planted, irrigated, and maintained by a Homeowners Association (HOA). The subdivision would be Americas with Disabilities Act (ADA) compliant.

The following requested deviations:

- Request deviation from single retaining wall height maximum (grade to grade) to exceed the 10-foot retaining wall height standard. Project proposes approximately 460 feet of single retaining wall along Smythe Avenue ranging from 0 to 26 feet in height and approximately 560 feet of single retaining wall ranging from 0 to 26 feet in height along the interior subdivision private driveway. The retaining wall would be a plantable, lay-back MSE wall. Project would not be able to meet minimum unit density of one dwelling unit (du) per 3,000 square feet, as required by RM-1-1 zone without the requested retaining walls.
- 2. Request deviation for development encroachment into steep hillside to achieve maximum development area. The deviation to steep hillside guidelines is requested to re-grade 100% of the steep hillside where the guidelines state that only 25% of the steep hillsides can be re-graded.

## II. ENVIRONMENTAL SETTING:

The project is located east of Smythe Avenue, north of Foothill Road, and west of the cul-de-sac at the end of Camino De Progresso, within the San Ysidro community planning area. The project site is situated in an area containing existing residential development. Single-family residential uses are adjacent to the project site to the north and east. Multi-family residential uses are also located east of the project site. Additional single-family residential uses are located west of the site, beyond Smythe Avenue, while multi-family residential uses are located southwest, also beyond Smythe Avenue. A small area of vacant land is adjacent to the project site to the south, with two single-family residential units also located south of the project site, north of Foothill Road. Smythe Avenue Elementary School is located less than 0.1 mile northwest of the project site. Our Lady of Mount Carmel School is located approximately 0.2 mile southeast of the project site. San Ysidro Health Center is located southeast of the project site.

The project site is currently undeveloped hillside, sloping generally southwest, with elevations ranging from 130 to 215 feet above mean sea level (amsl). Topography on the site is generally steep (10 to 20 percent). The Smythe Avenue property frontage consists of a large, steep cut slope (1.5:1 slope, up to 45 feet in height). An existing concrete brow ditch is located at the top of the Smythe Avenue cut slope.

The site is subject to the RM-1-1, Residential Medium density zone, RTPOZ, TAOZ, and TPA. In addition, MSCP ESL for steep slopes and sensitive biology, Fire Brush Management, Very High Fire Severity,

Brown Field Municipal Airport and NOLF Imperial Beach ALUCP – Review Area 2, and FAA Part 77 Noticing Area zones are mapped on the site.

## III. PROJECT BACKGROUND:

The San Ysidro Community Plan (SYCP) area encompasses approximately 1,863 acres within the southernmost part of the City of San Diego. The San Ysidro community lies south of State Route 905 (SR-905) and north of the United States International Border with Mexico, primarily between Interstate 5 (I-5) and Interstate 805 (I-805), with some portions east of I-805 near Otay Mesa and some west of I-5 adjacent to the Tijuana River Valley. The SYCP area contains the Southern, East Beyer and Hill Street, El Pueblito Viejo, Sunset, and Suburbs neighborhoods.

A comprehensive update to the 1990 San Ysidro Community Plan was conducted by the City and adopted by the City Council in November 2016. The update to the SYCP was undertaken to establish land use designations and policies to guide future development consistent with the City's General Plan. The SYCP is intended to implement the General Plan policies through the provision of community-specific recommendations. A concurrent rezone rescinded the Planned District Ordinance (PDO) and updated zoning regulations within the plan area. An updated Impact Fee Study (IFS) was adopted with the SYCP to facilitate implementation of the SYCP. The SYCP further expresses General Plan policies within the San Ysidro community through the provision of sitespecific recommendations that implement citywide goals and polices, address community needs, and guide zoning. The SYCP contains the following eight elements: Land Use; Mobility; Urban Design; Economic Prosperity; Public Facilities, Services, and Safety; Recreation; Conservation; and Historic Preservation. Each of these elements identifies a series of goals and policies intended to guide future development within the San Ysidro community.

Discretionary actions required to implement the SYCP, and addressed in the SYCP Final Program Environmental Impact Report (hereafter "SYCP Final PEIR"), included: amendments to the General Plan to incorporate the updated community plan; creation of a Local Coastal Program; provision of site-specific policies; amendments to the Land Development Code (LDC) for adoption of a rezone; rescission of the San Ysidro PDO; and comprehensive updates to the existing Public Facilities Financing Plan resulting in a new IFS for the plan area. The SYCP Final PEIR was certified on November 15, 2016 by the City of San Diego City Council. A Mitigation Monitoring and Reporting Program (MMRP), Findings, and Statement of Overriding Considerations for the SYCP were also adopted on that date. The SYCP designated the site for Low Medium Density Residential uses, which allows a density of 10 to 15 du/acre (du/ac).

## IV. DETERMINATION:

The City of San Diego previously prepared a Final Program Environmental Impact Report (Final PEIR) for the SYCP and has attached the conclusions of the Final PEIR to this Addendum.

Based upon a review of the current project, it has been determined that:

- a. There are no new significant environmental impacts not considered in the previous Final PEIR;
- b. No substantial changes have occurred with respect to the circumstances under which the project is undertaken; and

c. There is no new information of substantial importance to the project.

Therefore, in accordance with Section 15164 of the State California Environmental Quality Act (CEQA) Guidelines this Addendum has been prepared. No public review of this Addendum is required.

The following provides an analysis of the impacts of the project compared with the impacts analyzed in the SYCP Final PEIR. This comparative analysis has been undertaken, pursuant to the provisions of CEQA, to provide City decision-makers with the factual basis for determining whether any changes in the project, any changes in circumstances, or any new information since the SYCP Final PEIR was certified require additional environmental review or preparation of a subsequent or supplemental EIR. The basis for each of the findings is explained in the analysis that follows.

## Impact Analysis Summary

Project approval for the Pacifica Ridge project would allow for the construction of the proposed 44 two-story, detached, residential condominium units, surface parking, and associated landscaped open space areas and infrastructure. The analysis provided in this Addendum indicates that there are no new significant impacts that would result from the project and that all project-level impacts can be fully mitigated. A comparison of the project's impacts related to those of the adopted SYCP Final PEIR is provided below in Table 1 in the order in which they are discussed in the previous report.

Resource Area	SYCP Final	Project-	Project	SYCP Final	Project	
- The Periktipan and the sha	PEIR	Level	Impact	PEIR	Level	
and a she has a set of a	Analysis	Analysis	Conclusion	Mitigation	Mitigation	
Land Use	Less than	No new	Less than	No	No	
and the first states	significant	impacts	significant			
Transportation/	Significant,	No new	Less than	Yes	No	
Circulation	unavoidable	impacts	significant			
Air Quality	Significant,	No new	Less than	Yes	No	
	unavoidable	impacts	significant			
Greenhouse Gas	Less than	No new	Less than	No	No	
Emissions	significant	impacts	significant			
Noise	Significant,	No new	Less than	Yes	No	
	but mitigated	impacts	significant	NSV2 set that		
Biological	Significant,	No new	Significant,	Yes	Yes	
Resources	but mitigated	impacts	but	El Suelo III de S	Shinkler to private	
	een maas		mitigated	in lenn britt hits		
Historical	Significant,	No new	Less than	Yes	No	
Resources	unavoidable	impacts	significant			
Visual Effects and	Less than	No new	Less than	No	No	
Neighborhood	significant	impacts	significant		States in the second	
Character						

## **Table 1 - Impact Assessment Summary**

					and the second
Human	Less than	No new	Less than	No	No
Health/Public	significant	impacts	significant	and in the other	
Safety/Hazardous					
Materials	No. 1 - Service			alberta ter antari	n sha bita ta t
Hydrology, Water	Less than	No new	Less than	No	No
Quality, and	significant	impacts	significant	Security Sector	ing in the lot for
Drainage	Soften toblings	nendviel search		DATA VERSE (1921)	
Population and	Less than	No new	Less than	No	No
Housing	significant	impacts	significant	ALC: NO ALC: N	
Public Services	Less than	No new	Less than	No	No
	significant	impacts	significant		
Public Utilities	Less than	No new	Less than	No	No
	significant	impacts	significant	uniter i aritheri	
Energy	Less than	No new	Less than	No	No
Conservation	significant	impacts	significant	Constanting of the	
Geology and Soils	Significant,	No new	Less than	Yes	No
	but mitigated	impacts	significant	an start start s	Panality 50 mg
Paleontological	Significant,	No new	Significant,	Yes	Yes
Resources	but mitigated	impacts	but		
			mitigated		

## Table 1 - Impact Assessment Summary (cont.)

This Addendum to the SYCP Final PEIR includes the following analysis to demonstrate that environmental impacts associated with the project are consistent with the conclusions reached in the SYCP Final PEIR. The only modification to the development of the project site as analyzed in the SYCP Final PEIR is related to the density of the development. The SYCP assumed a maximum residential density of 15 du/ac for the subject site, while the proposed project would be developed at a density of 10 du/ac.

## Land Use

## FINAL PEIR

The SYCP Final PEIR identifies less than significant impacts for the SYCP's consistency with local land use plans. Based on the SYCP Final PEIR, the goals, policies, and programs of the SYCP are consistent with existing applicable local land use plans, policies, and regulations, including the General Plan, LDC, California Coastal Act, and San Diego Association of Governments (SANDAG) San Diego Forward: The Regional Plan. Potential land use policy consistency impacts are identified as less than significant.

The SYCP Final PEIR also includes an analysis of environmental planning consistency, summarized below. Specifically, consistency with the City's MSCP Subarea Plan and the Multi-Habitat Planning Area (MHPA). Encroachment into native vegetation within the western MHPA would be related to the connection of Calle Primera to Camino de la Plaza, and would consist of impacts to wetlands (riparian scrub and southern willow riparian forest). However, as the MSCP Subarea Plan identifies roads as an allowable use within the MHPA, if identified in a community plan/circulation/mobility

element as collector streets essential for area circulation and necessary maintenance/emergency access roads, the proposed Calle Primera road connection would be an allowable use within the MHPA. Additionally, future development implemented in accordance with the SYCP may propose an adjustment to the MHPA boundary; however, given that boundary adjustments require equal or better biological values and must meet MHPA boundary line equivalency criteria and obtain approval from the Wildlife Agencies, boundary adjustments would be considered less than significant. Future development adjacent to the MHPA would be subject to the MHPA Land Use Adjacency Guidelines, which address the issues of drainage, toxics, lighting, noise, barriers, invasive species, brush management, and grading/development. Additionally, the SYCP contains a policy that requires implementation of the MHPA Land Use Adjacency Guidelines for development in the proximity of Dairy Mart Ponds and the Tijuana River Valley. For these reasons, the SYCP Final PEIR identifies less than significant impacts relating to environmental planning consistency.

The SYCP area is approximately 2.5 miles from Brown Field Municipal Airport and 1.7 miles from the NOLF Imperial Beach. The SYCP Final PEIR identifies potential land use consistency impacts associated with the Brown Field Municipal Airport and NOLF Imperial Beach Airport Land Use Compatibility Plans (ALUCPs) as less than significant based on compliance with federal and local regulations, including an FAA determination and the City's LDC. The northern portion of the SYCP area is located within Review Area 2 of Brown Field Municipal Airport's Influence Area and most of the SYCP area is within NOLF Imperial Beach Review Area 2 boundaries. Review Area 2 consists of locations beyond Review Area 1 but within the airspace protection and/or overflight areas depicted on the respective maps in the Brown Field Municipal Airport and NOLF Imperial Beach ALUCPs. Associated requirements for new development or redevelopment in the Brown Field Municipal Airport Review Area 2 designation are limited to height restrictions for applicable structures/ locations. The Review Area 2 for NOLF Imperial Beach involves potential airspace compatibility issues related to glare; lighting; electromagnetic interference; dust, water vapor, and smoke; thermal plumes; and bird attractants.

The SYCP area is not located within the 60 community noise equivalent level (CNEL) noise contour associated with Brown Field Municipal Airport or NOLF Imperial Beach. The SYCP Final PEIR indicates that no significant plan inconsistencies between the SYCP and either airport would occur with regard to aircraft noise. The SYCP area is also not located near the runways of Brown Field Municipal Airport or NOLF Imperial Beach, and as such, would not be located within the Safety Zones of either airport. No significant plan inconsistencies between the SYCP and either airport would occur with respect to aircraft safety. The City's General Plan and the LDC contain regulations to ensure new development proposals are consistent with ALUCP policies. Compliance with these regulations would ensure that future development would be compatible with airport operations. The SYCP is also located within FAA Noticing Surface Areas associated with Brown Field Municipal Airport and NOLF Imperial Beach. Applicable future development under the SYCP would be subject to review under FAA Noticing Area requirements and associated appropriate measures to maintain compatibility with airport operations. Based on mandatory compliance with FAA regulatory criteria, potential impacts from ALUCP consistency associated with implementation of the SYCP would be less than significant.

The SYCP Final PEIR identifies a less than significant impact associated with the physical division of an established community. As discussed in the SYCP Final PEIR, community connectivity would be

enhanced by provisions in the SYCP that establish two villages and improved pedestrian, bicycle, and transit amenities.

#### **PROPOSED PROJECT**

#### **General Plan**

The project site is designated for Residential use in the City's General Plan. The project site is zoned RM-1-1. The project proposes 44 multi-family units on a 4.35-acre site, which would result in an overall density of 10 du/ac and is within the SYCP density range. The project's proposed use is consistent with the General Plan land use designation for the site and the residential density proposed is consistent with the densities analyzed in the SYCP Final PEIR.

## San Ysidro Community Plan

The SYCP designates the site for Low Medium Density Residential uses, which allows a density of 10 to 15 du/ac. The Low Medium Density Residential designation provides for both single-family and multi-family housing within a low-medium density range. The proposed 44 multi-family units on the 4.35-acre site would result in an overall density of 10 du/ac and would be consistent with the land use designation and density identified for the site within the SYCP.

#### Land Development Code

The zoning of the project site is RM-1-1, which implements SYCP land use. The RM-1-1 zone permits a maximum density of 1 dwelling unit for each 3,000 square feet of lot area. The 4.35-acre site is approximately 189,000 square feet of lot area. The 44 proposed units do not exceed the maximum density allowed by the RM-1-1 zone and are therefore consistent with residential densities allowed by the zone and community plan. The project is consistent with its land use designation in the SYCP and the proposed zoning would implement the uses envisioned in the SYCP.

As discussed in the project description, the project would comply with the development regulations in the RM-1-1 zone except for the one deviation related to the proposed retaining walls. No secondary physical impacts are anticipated from the deviation from single retaining wall height maximum because the plantable MSE would provide a source of visual interest, with greenery, which would improve views along Smythe Avenue and would include a landscape buffer at its base to further enhance its appearance. The placement of trees on the graded slopes of the project, as well as along the street frontage of Smythe Avenue, would serve to break up the large retaining wall. The proposed deviation would not result in secondary physical impacts because the deviation would not impact sensitive views along a scenic route or create a negative appearance (as discussed in more detail below in the *Visual Effects and Neighborhood Character* section of this Addendum).

#### Environmentally Sensitive Lands

The project site is located outside of, and not adjacent to, the MHPA. The site contains sensitive upland habitat, as described in the Biological Resources section of this Addendum. A SDP is requested for project impacts to sensitive biological resources, as permitted under the ESL Regulations. With implementation of mitigation measures identified in the MMRP (Section V of this Addendum) for biological resources, the project would not result in significant impacts associated with the City's ESL Regulations. The deviation related to encroachment into a steep hillside would not impact sensitive views along a scenic route or create a negative appearance (as discussed below under *Visual Effects and Neighborhood Character*).

#### Historical Resources Regulations

As discussed in *Historical Resources* below, the project's Cultural Resources Survey (LSA Associates, Inc., 2015) and subsequent testing and evaluation (LSA Associates, Inc., 2017) did not identify new significant impacts that were not already anticipated in the SYCP Final PEIR (refer to *Historical Resources* section of this Addendum). Thus, no new impacts to historical resources would occur as a result of the project and the project would comply with the Historical Resources Regulations.

#### California Coastal Act

The project site is not located within the Coastal Overlay Zone. No associated California Coastal Act land use policy consistency impacts would occur.

#### SANDAG San Diego Forward: The Regional Plan

The project proposes a residential development on a site that is designated for residential land use, in an urbanized area and in a transit priority area (TPA), consistent with the goals of the Regional Plan to focus growth in areas that are already urbanized. The project would not result in land use policy consistency impacts with SANDAG's Regional Plan.

## Airport Land Use Compatibility Plans

The nearest airports are located approximately three miles from the project (i.e., NOLF Imperial Beach, Brown Field Municipal Airport, and Tijuana International Airport). The SYCP Final PEIR indicates that no significant plan inconsistencies between the SYCP and the airports would occur with response to aircraft noise. The SYCP area is also not located near the runways of the three airports, and as such, would not be located within the Safety Zones of either airport. The project site is located within Review Area 2 of the NOLF Imperial Beach Airport Influence Area. Review Area 2 consists of areas within airspace protection and/or overflight notification areas. As discussed for the SYCP Final PEIR above, Review Area 2 for NOLF Imperial Beach also involves potential airspace compatibility issues related to glare; lighting; electromagnetic interference; dust, water vapor, and smoke; thermal plumes; and bird attractants. The project would also require FAA Part 77 Notification. The project would be required to comply with the structure height restrictions for Review Area 2, resident/owner disclosures, and FAA notification. As discussed for the SYCP Final PEIR above, no significant plan inconsistencies between the SYCP and either airport would occur with respect to aircraft safety. Because the proposed project is consistent with the uses designated for the site in the SYCP, the project would also not result in inconsistencies associated with airport land uses and operations. The City's General Plan and the LDC contain regulations to ensure new development proposals are consistent with ALUCP policies. Compliance with these regulations would ensure that the project would not result in land use policy inconsistencies with the identified airports. Impacts would be less than significant.

## Established Communities

The project site is within an established residential neighborhood of primarily detached homes. The site is within a bluff top adjacent to a major street and access through the site is constrained by steep topography. The project is an infill development proposing a similar residential use at a compatible density allowed by the SYCP. The project does not include uses or a development configuration that would create an obstruction or division in an established community. Impacts are less than significant and no new impact would occur.

## **Transportation/Circulation**

#### FINAL PEIR

The SYCP Final PEIR analyzed traffic impacts for the SYCP area based on adding future traffic volumes to the existing roadway conditions without any of the improvements identified in the Impact Fee Study (IFS). The SYCP Final PEIR concluded that there would be significant traffic impacts at 31 roadway segments, 25 intersections, one I-5 freeway segment, and two SR-905 freeway segments. Each of these impacts is identified as cumulatively significant. Program-level impacts are reduced through the identification of necessary roadway intersection and freeway improvements; however, mitigation or construction of identified improvements would occur at the project-level via the IFS, capital improvement projects, Caltrans projects, and through development funds or individual developments. Mitigation Framework Measures TRF-1 through TRF-35 identify specific improvements that would mitigate or reduce roadway segment and intersection impacts and are included in the IFS. Mitigation Framework Measures TRF-36 through TRF-56 identify specific improvements that would mitigate or reduce roadway segment and intersection impacts but are not included in the IFS. While implementation of the Mitigation Framework for traffic improvements would reduce impacts on roadway segments and intersections to acceptable levels, the City cannot assure that these improvements would be implemented for several reasons: full funding cannot be assured at the time the improvement is needed; implementation of the improvement is contrary to the overall goal of promoting smart growth and alternative forms of transportation in the community; or sufficient right-of-way does not exist to construct the improvement. Mitigation Framework identified in measures TRF-36 through TRF-56 would mitigate or reduce impacts to some roadway segments and intersections to acceptable levels; however, no identified funding sources exist because they are not included in the IFS. Thus, the SYCP Final PEIR identifies impacts to roadway segments and intersections as significant and unavoidable. Improvements identified in the SANDAG Regional Plan would mitigate or reduce all freeway segment impacts identified in the SYCP Final PEIR; however, as these improvements were determined to be beyond the full control of the City, the impacts to freeway segments remain cumulatively significant and unavoidable.

The SYCP Final PEIR identifies less than significant impacts associated with alternative transportation modes. Facilities planned as part of the SYCP would increase, not decrease, the percent of alternative mode trips in the City's transportation system. The SYCP contains goals and policies intended to promote enhanced public transit facilities, access, connection, and service within the community. As such, impacts to rail and bus, bicycle, and pedestrian facilities are identified in the SYCP Final PEIR as less than significant.

## **PROPOSED PROJECT**

The project would result in the development of 44 multi-family residential units, which would result in new traffic trips being generated from the project site. The City's Trip Generation Manual identifies a daily trip rate of 8 trips per dwelling unit for multiple dwelling units that are under 20 dwelling units per acre. Based on this rate, the proposed 44 residential units would generate 352 trips per day. The primary access to/from the project would be via Smythe Avenue between Avenida de la Madrid and Beyer Boulevard. Average daily traffic (ADT) trips along Smythe Avenue, between SR-905 and Beyer Boulevard, is 7,256 and the road operates at a LOS C (City of San Diego 2016). Classified as a 4-lane collector (no TWLT), Smythe Avenue is projected to have 13,300 ADT with a capacity to carry up to 1,515,000 ADT (see Tables 5.2-5 and 5.2-9 in the SYCP Final PEIR). The addition of 352 ADT to the road would represent an approximately 5 percent increase in existing daily trips along Smythe Avenue. The nearest intersections to the project site are Smythe Avenue/Avenida de la Madrid (which operates at LOS C in the AM and PM) and Smythe Avenue/Beyer Boulevard (which operates at LOS B in the AM and PM). Because the project is consistent with the planned land uses in the SYCP and would be at the lower end of the density allowed by the land use designation, it can be assumed that the traffic generated by the project has been accounted for in the future traffic forecast for the community. All of the road facilities (i.e., segments and intersections) in the vicinity of the project site are projected to operate acceptably in the future. Thus, the trips generated by the proposed project would be incremental in comparison to the traffic volumes existing and projected in the future along Smythe Avenue.

Traffic trips would also be temporarily generated during construction of the project, by transportation of construction equipment and workers to the site, as well as trips associated with the export of 57,950 CY of excess soil. As discussed in the project description, grading activities are expected to occur over a 3-month period. Assuming the use of haul trucks with a 10 CY capacity, removal of excess soil from the site would require approximately 5,795 truck trips. Assuming these trips would occur over a 12-week period, with 5 working days in each week, it is expected that average daily trips associated with soil export from the site would be approximately 97 trips. The expected daily 97 trips associated with soil export, when combined with other expected construction trips (such as delivery trucks and workers commuting to the project site), would be less than the operational trips described above and would be temporary during the construction period, with the largest amount of construction traffic trips occurring during the first three months due to grading and soil export.

Based on the relatively minor number of daily traffic trips generated by project construction and operation, the project would not conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system. The volume of new traffic produced by the project would be consistent with that assumed under the SYCP and the overall traffic generation modeling and analysis for SYCP buildout. As such, the project would not result in any new significant impacts beyond those identified in the program-level analysis described in the SYCP Final PEIR. However, the SYCP Final PEIR concludes that cumulatively significant impacts would occur along the segment of Smythe Avenue adjacent to the project site and at the Smythe Avenue/Beyer Boulevard intersection (PM only) by the horizon year. Several of the transportation improvements identified in the Mitigation Framework for the SYCP Final PEIR are near the project site, including TRF-3, TRF-4, TRF-15 and TRF-16. Thus, improvements to the impacted locations near the project site are included in the IFS and consist of recommendations to restripe Smythe Avenue to a 4-lane collector with a continuous two-way left turn lane (Mitigation Framework Measure TRF-3) and to install turn lanes at the Beyer Boulevard/Smythe Avenue intersection (Mitigation Framework Measure TRF-16).

The project includes frontage improvements to Smythe Avenue consistent with the SYCP. Specifically, Smythe Avenue would be widened along the project frontage into a modified four-lane collector. The modified four-lane collector street would include two full northbound lanes, a bicycle lane, curb, gutter, and non-contiguous sidewalk located within a 15-foot parkway, consistent with its SYCP classification. The Smythe Avenue improvements would extend along the length of the project property and transition into existing improvements at the north and south ends. In addition to these frontage improvements and to offset its incremental contribution to the previously identified cumulatively significant impacts, the project applicant would also be required to pay development impact fees toward the recommended improvements identified in the IFS for the SYCP Final PEIR including those in the project vicinity that are noted above. Therefore, the project's contribution to cumulative impacts would be less than significant.

Proposed improvements to Smythe Avenue would be constructed consistent with the City's requirements to ensure no hazards due to a design feature would be created. Project driveways would be consistent with City design requirements to ensure safe ingress/egress from the project site. Driveway sight distance at the intersection with Smythe Avenue would be in conformance with American Association of State Highway and Transportation Officials (AASHTO) standards, as required by the City of San Diego Street Design Manual. The project design includes the placement of visibility triangles at the project entrance on Smythe Avenue. No structures, trees, or shrubs taller than three feet would be located within the line of sight of these triangles. Based on compliance with City design requirements for the roadway improvements along Smythe Avenue and the project driveways, the project would not substantially increase hazards due to design feature.

Access along Smythe Avenue would be maintained during construction activities, ensuring adequate emergency access. A traffic control plan would be implemented as a condition of approval during construction activities to ensure that adequate access is maintained, even if temporary lane closures along Smythe Avenue are required during roadway improvement construction. The traffic control plan would be subject to City review and approval prior to construction activities. During long-term operation of the project, two access points (the proposed driveway that connects to Smythe Avenue and the proposed emergency access only driveway that would connect to Camino De Progresso) would be maintained, ensuring access for emergency response.

There are no bus stops adjacent to the project site, so construction activities along Smythe Avenue would not generally affect bus service in the project area. Existing bicycle lanes are present along Smythe Avenue. While there may be temporary closure or rerouting of the bicycle lanes along Smythe Avenue during project construction activities, the closure or rerouting would be temporary and would be conducted in compliance with City requirements. Additionally, the project would be required to prepare a traffic control plan prior to construction detailing the plan for temporary closures and/or detours associated with construction activities. Following completion of construction activities, bicycle lanes would be available along the improved portion of Smythe Avenue and connect to the existing lanes at the north and south ends of the improvements. In addition, the project would construct new multi-family housing within walking distance of the Beyer Boulevard Trolley Station. Therefore, the project would be consistent with alternative transportation programs identified in the SYCP Final PEIR and not conflict with transit, bicycle or pedestrian facilities or decrease the performance of such facilities. Less than significant impacts are identified.

#### **Air Quality**

## FINAL PEIR

As discussed in the SYCP Final PEIR, the San Diego Regional Air Quality Strategy (RAQS) is based on the growth projections of the SANDAG and land use plans developed by the cities and by the County, and therefore included projections for the SYCP area based on the 1990 San Ysidro Community Plan. The SYCP proposed increased development compared to the 1990 San Ysidro Community Plan, with an increase in residential units of 81 percent, and an increase in land designated for commercial and industrial uses (7 and 2 percent, respectively). However, as discussed in the SYCP Final PEIR, while the SYCP is not consistent with the RAQS due to the land use changes, the SYCP would generate less traffic trips as compared to the 1990 San Ysidro Community Plan (472,023 ADT under the 1990 San Ysidro Community Plan versus 441,147 ADT for the SYCP), resulting in lower mobile emissions for the SYCP compared to those used in developing the RAQS. Additionally, the SYCP Final PEIR concludes that the SYCP is consistent with the goals of the RAQS to develop compact, walkable communities close to transit connections and consistent with smart growth principles. Based on the reduction of ADT for the SYCP compared to the 1990 San Ysidro Community Plan and the SYCP's consistency with the goals of the RAQS for reducing emissions, the SYCP Final PEIR identifies a less than significant impact associated with conformance to the RAQS, and no mitigation was required.

Based on the SYCP Final PEIR, development associated with the SYCP would generate criteria pollutants in the short term during construction and the long term during operation. Construction activities associated with new development under the SYCP would result in emissions of fugitive dust from demolition and site grading activities, heavy construction equipment exhaust, and vehicle trips associated with workers commuting to and from construction sites and trucks hauling materials. The exact number and timing of individual development projects that would occur as a result of implementation of the SYCP are unknown; therefore project-level construction emission estimates cannot be determined, resulting in a potentially significant impact, requiring mitigation. Operational source emissions would originate from traffic generated within or as a result of future development pursuant to the SYCP. Area source emissions would result from activities such as the use of fireplaces and consumer projects. Landscape maintenance activities associated with the SYCP land uses would also produce pollutant emissions. The SYCP Final PEIR identifies an increase in existing conditions for all criteria pollutants, due to the increase in development associated with the buildout of the SYCP. Additionally, SYCP emissions of the criteria pollutants Reactive Organic Gases (ROG), carbon monoxide (CO), and particulate matter (PM<sub>10</sub>, and PM<sub>2.5</sub>) during operation would exceed established daily thresholds, resulting in a significant impact with respect to conformance to State and federal ambient air quality standards and with respect to a cumulatively considerable net increase in criteria pollutants. The SYCP Final PEIR presented Mitigation Framework Measures AQ-1 through AQ-5 to reduce project-level impacts associated with construction and operational emissions impacts. Mitigation Framework AQ-1 and AQ-4 requires construction-related and operation-related air quality impact analysis for proposed development projects within the SYCP area, using the latest available CalEEMod model, or other analytical methods determined in conjunction with the City, and the incorporation of appropriate mitigation to reduce identified impacts. Mitigation Framework AQ-2 requires the incorporation of best available control technology to projects that exceed daily emissions thresholds. Mitigation Framework AQ-3 requires each individual implementing development project to submit a traffic control plan prior to the issuance of a grading permit. Mitigation Framework AQ-5 requires the use of energy-efficient street lighting to reduce energy consumption from future development. Even with implementation of mitigation framework, the SYCP Final PEIR identifies significant and unavoidable air quality impacts associated with construction and operational emissions. As the SYCP Final PEIR is a program-level document, project-level impacts could not be determined even with implementation of mitigation, and impacts remained significant and unavoidable.

The SYCP Final PEIR identifies a potential for CO hot spots, resulting in the exposure of sensitive receptors to substantial, project generated, local CO emissions, and the exposure of sensitive land uses to mobile sources of diesel particulate matter. Mitigation Framework AQ-4 requires mitigation of any CO hotspot impacts directly linked to subsequent development under the SYCP. Additionally, Mitigation Framework AQ-6 requires a health risk assessment to be prepared for any facility with the California Air Resources Board (CARB) recommended buffer distance (refer to SYCP Final PEIR Table 5.3-7, *CARB Land Use Siting Recommendations*) identified for Toxic Air Contaminants (TACs). The health risk assessment shall demonstrate that health risks would be below the level of significance identified in SYCP Final PEIR Table 5.3-4, *Screening-Level Thresholds for Air Quality Impact Analysis.* As the SYCP Final PEIR is a program-level document, project-level impacts could not be determined even with implementation of mitigation, and impacts remained significant and unavoidable. The SYCP Final PEIR identified odor impacts as less than significant.

#### **PROPOSED PROJECT**

The project is consistent with the land use designation for the site in the SYCP, and therefore would not conflict with the RAQS or the region's ability to achieve its emissions reduction goals. As identified in the City's CEQA Significance Thresholds, projects that would typically result in significant air quality impacts would include development that would produce 9,500 ADT. As discussed in the Transportation/Circulation section above, the project is expected to generate 352 ADT, based on the City's Trip Generation Manual. As such, the project would not have the potential to cause a significant operational air quality impact or conflict with or obstruct implementation of the RAQS.

The project would result in the short-term, temporary generation of construction emissions, as well as emissions associated with long-term operation of the project. Construction emissions would be generated from the use of construction equipment at the site; construction-related traffic trips from workers, delivery trucks, and soil hauling trucks; and grading activities. Construction emissions would be temporary and short-term in nature. Construction-related traffic trips would be far below the 9,500 ADT discussed above for a significant air quality impact, and thus construction-related onroad vehicles would not have the potential to violate an air quality standard or contribute to an existing or projected air quality violation. The City's CEQA Significance Thresholds identify 100 pounds per day of PM<sub>10</sub> (particulate matter 10 microns in diameter or less) as a screening threshold for fugitive dust impacts. The South Coast Air Quality Management District's CEQA Air Quality Handbook (1993) estimates that site grading generates 26.4 pounds PM<sub>10</sub> per graded acre. Roughly 100 pounds of  $PM_{10}$  is generated by grading 4 acres per day. The project site is 4.35 acres. If the entire project site was graded in one day, it would result in an exceedance of the 100 pounds PM<sub>10</sub> screening threshold; however, as discussed in the project description, grading activities would occur over a 3-month period, so the entire project site would not be graded in one day. Additionally, as discussed in the City's CEQA Significance Thresholds, daily watering at the site prior to/during grading activities would reduce dust emissions by 50 percent. A second daily watering would reduce dust emissions by 75 percent. The project would implement Best Management Practices (BMPs) for construction activities, including daily watering at the site prior to/during construction activities, in accordance with the City's Grading Ordinance. With the required implementation of daily watering, the fugitive dust emissions would be well below the 100 pounds per day threshold. Additionally, construction activities would be required to comply with the City's BMPs which are enforceable under San Diego Municipal Code (SDMC) Section 142.0710. Based on this information and the

expected operational emissions discussed in the paragraph above, the project would not violate an air quality standard or contribute to an existing or projected air quality violation.

The project is a residential development, which is not typically associated with odor-generating uses. As such, the project does not have the potential to release objectionable odors.

As described above, the project would not result in new significant air quality impacts (construction and/or operational) through project implementation. Therefore, no new impact would occur and no project-specific mitigation measures are necessary.

## **Greenhouse Gas Emissions**

## FINAL PEIR

The SYCP Final PEIR identifies less than significant impacts associated with direct and indirect emissions of greenhouse gases. Greenhouse gas (GHG) emissions impacts associated with the SYCP were determined by comparing GHG emissions of the SYCP with existing conditions and with buildout of the 1990 San Ysidro Community Plan. The SYCP Final PEIR determined that implementation of the SYCP would result in an increase in GHG of 139,669 metric tons (MT) of carbon dioxide equivalents (CO<sub>2</sub>e) over the existing condition. Additionally, buildout of the SYCP would result in a reduction of 15,105 MT CO<sub>2</sub>e per year when compared to buildout of the 1990 San Ysidro Community Plan. As discussed in the SYCP Final PEIR, the City adopted its Climate Action Plan (CAP) in December 2015, which identifies measures to meet GHG reduction targets for 2020 and 2035. Additionally, an amendment to the CAP was adopted in July 2016 which included the CAP Consistency Checklist. With the adoption of the CAP Consistency Checklist, the City's CAP meets all requirements to be a Qualified GHG Reduction Plan. In meeting these requirements, the City of San Diego has analyzed and mitigated the significant effects of GHG emissions for the entire City at the programmatic level. Pursuant to CEQA Guidelines Section s 15183.5(b), 15064(h)(3), and 15130(d), the City may determine that a project's incremental contribution to a cumulative GHG effect is not cumulatively considerable if the project complies with the requirements of a previously adopted Qualified GHG Reduction Plan. The CAP Final PEIR concluded that implementation of the CAP, which includes an annual monitoring program, would result in less than significance overall citywide GHG emissions. The SYCP Final PEIR analysis of GHG emissions tiers from the analysis contained in the CAP certified Final PEIR. Although the SYCP Final PEIR identifies an increase in GHG emissions compared to the existing condition, a reduction of GHG emissions would occur when compared to the 1990 San Ysidro Community Plan. Thus, impacts associated with direct and indirect GHG emissions from the SYCP are identified in the Final PEIR as less than significant because, as set forth in the CAP Final PEIR, implementation of the City's CAP would result in Citywide GHG emission reductions consistent with its proportionate share of statewide GHG emissions targets. The CAP assumes future population and economic growth based on the community plans that were in effect at the time the CAP was being developed (which included the 1990 San Ysidro Community Plan). As the SYCP would result in a reduction in GHG at buildout compared to the 1990 San Ysidro Community Plan, it would ensure that the assumptions that went into the CAP would not be significantly altered, and therefore implementation of the CAP would still result in Citywide reductions identified in the CAP. Potential impacts related to GHG emissions from implementation of the SYCP would be less than significant.

The SYCP Final PEIR identifies less than significant impacts associated with consistency with adopted plans, policies, and regulations for the purpose of reducing GHG emissions. The SYCP is consistent with the CARB Climate Change Scoping Plan measures through incorporation of stricter building and appliance standards. The SYCP is consistent with the goals of SANDAG's Regional Plan to develop compact, walkable communities close to transit connections and consistent with smart growth principles by establishing two pedestrian-oriented, urban, mixed-use community villages that would reduce reliance on the automobile and promote walking and the use of alternative transportation. The SYCP supports the multi-modal strategy of the Regional Plan through the designation of two villages along a Trolley corridor, as well as a planned Intermodal Transit Center that would accommodate several transportation modes. Policies contained within the SYCP Land Use and Mobility Elements serve to promote bus transit use, walking, and bicycling. The SYCP incorporates goals and policies intended to support the General Plan policies related to GHG emissions and would result in less than significant impacts associated with General Plan consistency. The SYCP Final PEIR also identifies the SYCP as consistent with the City's CAP. The CAP's Monitoring and Reporting Program Measure 1.4 requires annual evaluation of policies, plans and codes to ensure the CAP reduction targets are met. Through monitoring the effectiveness of CAP actions at reducing GHG emissions, the City would be able to make adjustments to the CAP which could include amending land use plans to reflect more aggressive strategies for GHG reduction. Consistency impacts with adopted plans, policies, and regulations for the purpose of reducing GHG emissions are identified as less than significant in the SYCP Final PEIR.

#### **PROPOSED PROJECT**

The project is consistent with the City's CAP, as demonstrated through compliance with the CAP checklist and the GHG projections in the CAP, and would implement the applicable CAP strategies related to requirements for energy and water efficient buildings (cool/green roofs, and plumbing fixtures and fittings) and bicycle, walking, transit, and land use (electrical vehicle charging). The CAP Consistency Checklist shows the project would be consistent with the requirements of the City's CAP; therefore, impacts from greenhouse gas emissions would be less than significant. In addition, the project would be developed consistent with the City's General Plan Sustainable Development Policies (contained in the Conservation Element of the General Plan). Sustainable design features that would reduce the project's overall demand for energy include installation of energy- and water-efficient systems and implementing sustainable landscape design features. By implementing these project design features and by complying with regional sustainability programs, the project would be consistent with the policies from the Conservation Element of the General Plan that address conservation with the goal of reducing GHG emissions. The project has completed the CAP Consistency Checklist and is consistent with the requirements of the City's CAP (BCG 2017). Compliance with the CAP would be a condition of project approval. Therefore, the project would not conflict with an applicable plan, policy, or regulations adopted for the purpose of reducing the emissions of greenhouse gases.

In conclusion, the SYCP Final PEIR calls out less than significant impacts related to GHG emissions. As discussed above, the project is consistent with applicable SYCP policies and the CAP through compliance with the CAP checklist. Impacts are less than significant, no new impacts would occur, and no mitigation is required.

## <u>Noise</u>

#### **FINAL PEIR**

The SYCP Final PEIR indicates that traffic increases attributable to the implementation of the SYCP would result in noise levels over 60 CNEL along a number of community roadways including Beyer Boulevard, Camino de la Plaza, and East and West San Ysidro Boulevard. The SYCP Final PEIR identifies significant impacts for areas where the design of existing or future residential development would be unable to achieve interior noise levels of less than 45 A-weighted decibels (dBA). The SYCP Final PEIR includes Mitigation Framework Measure NOI-1, which would require site-specific noise analyses for new development that would expose people to noise exceeding normally acceptable levels. This includes multi-family homes where the exterior noise levels exceed 65 to 70 CNEL or greater. Mitigation Framework Measure NOI-1 requires the acoustical analysis to be conducted to ensure that barriers, building design and/or location are capable of maintaining interior noise levels at 45 CNEL or less. Implementation of Mitigation Framework Measure NOI-1, along with compliance with local, state, and federal noise control laws, would reduce impacts related to noise to less than significant for future development associated with buildout of the SYCP.

Future development pursuant to the SYCP would increase noise levels by more than 3 dBA by the year 2035 (compared to existing conditions) along 13 roadway segments. However, because exterior noise levels along these 13 roadways would remain below the 65 CNEL, exclusive of freeway noise, the SYCP Final PEIR determined implementation of the SYCP would not result in a significant increase in ambient noise levels on local roadways and that impacts associated with a substantial noise level increase would be less than significant.

The SYCP Final PEIR identifies the trolley and night freight trains within the SYCP area as potential sources of ground-borne vibration. Future development pursuant to the SYCP has the potential to locate new vibration-sensitive land uses within screening distance of the railroad tracks in the SYCP area. New development within screening distance of the railroad tracks would require further analysis to determine vibration-sensitive impacts. Impacts associated with ground-borne vibration are identified in the SYCP Final PEIR as potentially significant. The SYCP Final PEIR identifies Mitigation Framework Measure NOI-2 to reduce potential vibration-related impacts. Mitigation Framework Measure NOI-2 requires preparation of a site-specific vibration study for proposed land uses within Federal Transit Administration (FTA) screening distances for potential vibration impacts related to train activity. Proposed development would be required to implement the vibration study's recommended measures to ensure vibration impacts meet the FTA criteria for vibration impacts on future development to a less than significant level.

The SYCP Final PEIR discusses short-term construction noise impacts associated with future development pursuant to the SYCP. Construction activities related to implementation of the SYCP would not all take place at the same time; however, future development accommodated by the SYCP would have the potential to temporarily generate construction noise, resulting in a short-term annoyance to nearby noise sensitive land uses. Construction noise would be regulated by the SDMC; therefore, construction noise impacts associated with future development pursuant to the SYCP are identified as less than significant. No framework mitigation is required.

The SYCP Final PEIR indicates that the SYCP area is located near three airfields: NOLF Imperial Beach (located 1.7 miles west of the SYCP area), Brown Field Municipal Airport (located 2.5 miles northeast of the SYCP area), and Tijuana International Airport (located 2.3 miles to the southeast in Mexico). The SYCP area is not within the 60 CNEL noise contour of either NOLF Imperial Beach or Brown Field Municipal Airport. According to the Noise Element of the San Diego General Plan, aircraft noise from operations at the Tijuana International Airport primarily affects open space and industrial uses adjacent to the international border. As such, the SYCP area is not affected by aircraft operation noise in excess of 60 CNEL and future development pursuant to the SYCP would not be significantly impacted by nearby airport operations. The SYCP Final PEIR identifies airport noise impacts as less than significant and no framework mitigation is required.

#### **PROPOSED PROJECT**

The project would result in short-term noise impacts associated with grading and construction activities. A construction noise analysis was prepared for the project by Eilar Associates, Inc. (May 2018). Construction activities would be required to comply with the construction hours and noise limits specified in the SDMC (Section 59.5.0404, Construction Noise), which are intended to reduce potential adverse effects resulting from construction noise. The SDMC prohibits construction activity between the hours of 7:00 PM and 7:00 AM and on Sundays and legal holidays. During permissible hours of operation, noise levels from construction activity must be limited to a 12-hour average of no greater than 75 dBA at any property line zoned for residential use. Based on calculations prepared for the noise analysis, typical construction activities would not exceed the City of San Diego construction noise limit of 75 dBA at adjacent property lines during construction activity. Construction would occur in such a manner as to make use of the existing slope of the hill on which the site is located. Construction equipment would grade from the west side of the project site, at street level on Smythe Avenue, and would grade in accordance with project plans, leaving a natural earth berm to the east as project grading progresses. This earthen berm would provide a barrier to construction noise activity for the residences to the east of the project. Construction phasing would be assured as a condition of approval of the project. Based on the grading construction noise levels modeled for the project, the highest noise levels for adjacent residences would be 72.7 dBA during grading adjacent to the residences. The construction noise analysis modeled construction noise levels at 23 receiver locations. Only 4 of the 23 locations would experience noise levels in excess of 70 dBA, and none would experience noise levels in excess of the City's standard of 75 dBA. Additionally, the project would implement the following "good practice" noise control measures when construction activity would occur near occupied residential properties:

- 1. Construction equipment shall be turned off when not in use.
- 2. Equipment used in construction shall be maintained in proper operating condition, and all loads shall be properly secured, to prevent rattling and banging.
- 3. Construction equipment with effective mufflers shall be used at the project site.
- 4. The use of backup alarms shall be minimized whenever possible.
- 5. Equipment staging areas shall be placed at locations away from noise-sensitive (occupied) receivers as much as possible.

Consistent with the SYCP Final PEIR, construction noise from the project would be regulated by the SDMC. Impacts associated with construction noise would be less than significant and no new impact would occur.

Long-term noise generated from the project would include noise associated with traffic trips to and from the residential uses, as well as noise typical of residential uses, such as heating/air conditioning equipment operation. According to the SYCP Final PEIR, average daily traffic trips along Smythe Avenue, between SR-905 and Beyer Boulevard, are currently 7,256 and would increase to 13,300 ADT during buildout of the SYCP. The additional traffic trips associated with 44 residences (i.e., 352 ADT) would not result in a perceptible change in noise levels along Smythe Avenue. Additionally, other operational noise for the project (which would be noise typical of residential uses) would be similar to noise already occurring in the residentially developed area and would not substantially increase ambient noise levels. Heating/air conditioning equipment would be required to comply with the noise limits in the SDMC. As such, SYCP Final PEIR Mitigation Framework NOI-1 would not be required for the project. Therefore, the project would not result in a substantial permanent increase in ambient noise levels in the project vicinity and no new impact would occur.

Construction equipment may create temporary vibrations in the immediate vicinity of activity; however, these would be short term and would be localized in the immediate vicinity of the construction equipment. Project construction would comply with the City's Noise Ordinance, which would reduce potential effects associated with construction noise, including related ground-borne vibration. The project would not generate ground-borne vibration during its long-term operation. Additionally, the FTA screening distance for potential vibration impacts related to train activity is 200 feet for residential uses. Proposed residential uses within 200 feet would be required to prepare a site-specific vibration study. The proposed residential uses are located approximately 600 feet from the nearest railroad track, which is located on the south side of Beyer Boulevard. The project is not within 200 feet of the track, and as such is not subject to a site-specific vibration study. Therefore, SYCP Final PEIR Mitigation Framework Measure NOI-2 would not be required for the project. Impacts associated with vibration would be less than significant and no new impact would occur.

The project is not located within an airport land use plan or within two miles of a public airport. The nearest airports are located approximately three miles from the project (NOLF Imperial Beach, Brown Field Municipal Airport, and Tijuana International Airport). Construction workers and residents at the project site would not be exposed to excessive noise levels associated with airports. Impacts are less than significant and no new impact would occur.

## **Biological Resources**

## FINAL PEIR

The SYCP Final PEIR identified potentially significant impacts to sensitive plants and animals through the implementation of the SYCP, directly through the loss of habitat and indirectly by placing development adjacent to the MHPA. Potential impacts to federal or State listed species, MSCP Covered Species, Narrow Endemic Species, plant species with a California Native Plant Society Rare Plant Rank of 1 or 2, and wildlife species included on the California Department of Fish and Wildlife (CDFW) Special Animals List would likely be significant. Potential impacts to birds covered by the Migratory Bird Treaty Act (MBTA) would be avoided by adherence to the requirements of the MBTA. Mitigation Framework (Measures BIO-1 through BIO-9), which requires site-specific biological resources surveys be conducted in accordance with City of San Diego Biology Guidelines, is provided to minimize impacts to sensitive biological resources. These measures require site-specific surveys for sensitive plants, fairy shrimp, Quino checkerspot butterfly, coastal California gnatcatcher, least Bell's vireo, burrowing owl, coastal cactus wren, nesting birds, and other wildlife species. Although implementation of the SYCP has potential to result in significant direct and indirect impacts to sensitive plant and animal species, which can be mitigated at the project level, specific projects would be required to implement the Mitigation Framework identified in the Final PEIR, requiring sitespecific environmental review, analysis of potential impacts to biological resources, and recommendations for project-specific mitigation. Compliance with Mitigation Framework Measures BIO-1 through BIO-9, combined with SYCP policies promoting preservation of significant resources and compliance with the City's MSCP would reduce impacts to a less than significant level for future development associated with the SYCP.

According to the SYCP Final PEIR, the implementation of the SYCP has the potential to impact up to approximately 3.8 acres of wetland communities and 98.4 acres of Tier I, II, and IIIB habitats in the SYCP area. These impacts could occur directly through removal or indirectly by placing development adjacent to sensitive vegetation communities. Sensitive habitats with the potential to be impacted by future development as a result of SYCP implementation included Diegan coastal sage scrub (including disturbed), maritime succulent scrub (including disturbed), saltbrush scrub, and nonnative grassland. Mitigation Framework Measure BIO-10 requires wetland avoidance, if feasible, or mitigation for wetland impacts to achieve no net loss of wetland function and value. Mitigation Framework Measure BIO-11 requires avoidance of sensitive upland vegetation communities, where feasible. Where avoidance is not feasible, Mitigation Framework Measure BIO-11 requires mitigation through habitat acquisition/preservation, restoration, and/or creation. Mitigation Framework Measure BIO-11 allows for an in-lieu contribution to be made to the City's Habitat Acquisition Fund for individual project impacts that would not exceed 5 acres (and in some cases up to 10 acres). Impacts to sensitive habitats would be reduced on a program-level to less than significant through compliance with SYCP policies and compliance with the City's MSCP, along with implementation of Mitigation Framework Measures BIO-10 and BIO-11.

As discussed in the SYCP Final PEIR, implementation of the SYCP has the potential to result in impacts to wetlands (and non-wetland waters) directly through their loss or indirectly by placing development adjacent to them in the MHPA. These impacts would be associated with the construction of the extension of Calle Primera and would be significant because these resources are regulated by the City, CDFW, United States Army Corps of Engineers (USACE), Regional Water Quality Control Board (RWQCB), and United States Fish and Wildlife Service (USFWS). Compliance with SYCP policies and implementation of the Mitigation Framework Measure BIO-10 would serve to reduce impacts to wetlands (and non-wetland waters) to below a level of significance.

The SYCP Final PEIR identifies a less than significant impact associated with wildlife movement. There are no regional wildlife movement corridors in the SYCP area. The former Tijuana River channel in the western portion of the SYCP area may provide local access to resources for resident or migratory species. Furthermore, the proposed bridge crossing of the riparian habitat in the former Tijuana River channel for extension of Calle Primera to Camino de la Plaza would not preclude local use of habitat by wildlife. Impacts are identified as less than significant. Future development implemented in accordance with the SYCP may propose an adjustment to the MHPA boundary; however, given that boundary adjustments require equal or better biological values and must meet MHPA boundary line equivalency criteria and obtain approval from the Wildlife Agencies, boundary adjustments would be considered less than significant. Development of the SYCP is expected to occur in accordance with the requirements of the City's MSCP Subarea Plan and the MHPA Land Use Adjacency Guidelines. The SYCP Final PEIR identifies no significant impact related to conservation planning or conflicts with adopted habitat conservation plans.

Future development associated with SYCP buildout that would be adjacent to the MHPA could adversely impact adjacent MHPA from factors related to drainage, toxics, lighting, noise, barriers, invasive species, brush management, and grading/development. Edge effects from future development in the SYCP area could degrade habitat or alter animal behavior within the preserve, which would be a significant impact. However, MHPA adjacency issues would be addressed at the project level in accordance with the requirements of the MHPA Land Use Adjacency Guidelines. Impacts would be less than significant at the program level.

The SYCP Final PEIR identifies a less than significant impact associated with conflicts with local policies/ordinances. The City's ESL Regulations require avoidance of MHPA lands, wetlands, vernal pools in naturally occurring complexes, MSCP Covered Species, and MSCP Narrow Endemics. The regulations also state that wetland impacts should be avoided, and unavoidable impacts should be minimized to the maximum extent practicable. Future development in the SYCP area would be required to comply with all applicable ESL Regulations. Project-specific biological analysis and appropriate mitigation, as needed to ensure compliance with the ESL Regulations, would ensure that no conflicts would occur with local policies/ordinances on a program level, and impacts associated with SYCP implementation would be less than significant.

Future projects would be required to implement the MHPA Land Use Adjacency Guidelines, which requires that a project's landscape plan not contain exotic/invasive species and would include an appropriate mix of native species which would be used adjacent to the MHPA. The SYCP Final PEIR identifies a less than significant impact associated with the introduction of invasive species.

## **PROPOSED PROJECT**

A site-specific Biological Resources Report was prepared for the project by LSA Associates, Inc. (February 22, 2018), with the applicable surveys being conducted as required by SYCP Final PEIR Mitigation Framework Measures BIO-1 through BIO-9. The biological resources assessment included a literature review, a database records search, and an on-site biological survey of the project site. The project site is located within the MSCP area, but is entirely outside of MHPA boundaries. The biological survey determined that the majority of the site contains disturbed habitat, consisting of non-native vegetation, and maritime succulent scrub, which consists of native cactus species and other native vegetation species. Several dirt mounds overgrown by nonnative vegetation (mapped as disturbed habitat) are present at the eastern portion of the project site. About 0.13 acre of the site is developed.

## Vegetation Communities

Construction of the project would result in permanent impacts to the entire project site. Table 2 identifies impacts anticipated to occur to each vegetation community type as a result of project-related activities. Maritime succulent scrub is designated in the City Biology Guidelines as Tier I Rare Upland and is considered a sensitive habitat. Project-level impacts to this vegetation community would be significant. Consistent with SYCP Mitigation Framework Measure BIO-11, project-specific mitigation would be required and is contained in the MMRP, Section V of this Addendum. Impacts to disturbed and ornamental vegetation communities are not considered significant.

Vegetation Community Type	Tier Value	Permanent Impacts
Maritime Succulent Scrub		1.98
Disturbed Habitat	IV	2.42
Developed	IV	0.13
Total		4.53

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Source: LSA Associates, Inc. 2018

Note: The Biological Resources Report evaluated a study area of 4.53 acres, which is in excess of the 4.35 acres identified for the project site. The additional 0.18 acre included in the Biological Resources Report includes a larger portion of Smythe Avenue along the frontage of the project site.

#### Special-Status Plant Species

San Diego barrel cactus, San Diego bur-sage, and golden-spined cereus were observed within the project site during the field surveys. Individuals of these species within the project impact area would be cleared during construction activities. There are no special provisions for these species in the MSCP. No other special-status plant species were observed during surveys. Impacts to San Diego barrel cactus would be considered less than significant because the impact area is outside of the MHPA, the species is an MSCP-covered species, and it will be conserved elsewhere in the MHPA in areas containing maritime succulent scrub and coastal sage scrub. Impacts to San Diego bur-sage would be considered less than significant because the impact area is outside of the MHPA, the species has a relatively low sensitivity, and it will be conserved elsewhere in the MHPA in areas containing maritime succulent scrub and coastal sage scrub. Impacts to golden-spined cereus would be considered less than significant because the impact area is outside of the MHPA, the species has a relatively low sensitivity, only two individuals would be affected, and the species will be conserved elsewhere in the MHPA in areas containing maritime succulent scrub and coastal sage scrub. None of the species on the City's narrow endemic list have a moderate or high potential of occurring within the project site due to the absence of suitable habitat.

## Special-Status Avian Species and Nesting Birds

No special-status avian species were observed during the field survey; however, coastal California gnatcatcher and coastal cactus wren both have a moderate potential to occur within the project site based on the presence of suitable habitat. Impacts to maritime succulent scrub have the potential to affect coastal California gnatcatcher and coastal cactus wren directly through the loss of suitable foraging and nesting habitat. However, because these species were not observed during surveys and because the maritime succulent scrub on site is isolated and not contiguous with larger areas containing maritime succulent scrub or coastal sage scrub, impacts to these species would be considered less than significant.

Project-related activities also may cause both temporary and permanent impacts to foraging and/or nesting habitat for avian species that are not considered special-status, but are protected by the MBTA. Project construction could result in potentially significant impacts to nesting birds, requiring mitigation. Project compliance with the MBTA and all other applicable state and federal regulations is anticipated. Thus, impacts to nesting birds would be less than significant.

#### Waters of the U.S., Waters of the State, and City Wetlands

No areas potentially subject to the jurisdiction of the USACE or the CDFW are present on the project site. SYCP Final PEIR Mitigation Framework Measure BIO-10 is not applicable to the project, as no wetland habitat is present on the project site. No impacts to waters of the U.S., waters of the State, or City wetlands would occur and no project-specific mitigation would be required.

#### Wildlife Corridors

The MHPA includes core biological resource areas and corridors targeted for conservation that preserve local and regional corridor functions. As discussed above, the SYCP area, including the project site, does not contain regional wildlife movement corridors. The project site is an isolated patch of habitat, located in a developed area, and is not part of a regional wildlife corridor. Impacts would be less than significant. No new impact would occur under the proposed project and no project-specific mitigation would be required.

#### **MSCP** Evaluation

The project site is located within the MSCP area but is entirely outside of MHPA boundaries. A SDP is requested for project impacts to sensitive biological resources, as is permitted under the ESL Regulations.

The project would implement project-specific mitigation, as detailed within Section V of this Addendum, and would reduce impacts related to biological resources to below a level of significance. Therefore, the project would not conflict with the City's MSCP or other habitat conservation plan or natural community conservation plan.

## Local Policies and Ordinances

The City's ESL Regulations require avoidance of MHPA lands, wetlands, vernal pools in naturally occurring complexes, MSCP Covered Species, and MSCP Narrow Endemics. The regulations also state that wetland impacts should be avoided, and unavoidable impacts should be minimized to the maximum extent practicable. The project site is not located within the MHPA, nor does it contain wetlands, vernal pools, or MSCP Narrow Endemics. The project-specific biological resources report identified potentially significant impacts to MSCP covered species but has provided mitigation in Section V of this Addendum to reduce impacts to those species to a less than significant level. Implementation of the biological resources mitigation contained in Section V of this Addendum would ensure compliance with the ESL Regulations and would ensure that no conflicts would occur with local policies/ordinances. Impacts would be reduced to a less than significant level.

## **Historical Resources**

## FINAL PEIR

According to the SYCP Final PEIR, the San Ysidro community includes known historical and archaeological resources. Future build-out pursuant to the SYCP could have a significant impact on these resources as well as subsurface cultural resources which have not been identified by previous studies. The SYCP Final PEIR Mitigation Framework Measures HIST-1 and HIST-2 establishes mitigation for archaeological and tribal cultural resources and historic buildings, structures, and objects impacts, respectively. Compliance with Mitigation Framework HIST-1, combined with SYCP policies promoting the identification and preservation of significant archaeological resources and compliance with CEQA and Public Resources Code Section 21080.3.1 requiring tribal consultation, reduces impacts to archaeological or tribal cultural resources to a less than significant level for future development. Compliance with Mitigation Framework HIST-2 would reduce impacts to historic buildings, structures, and objects; however, the ability of Mitigation Framework HIST-2 to adequately protect significant historic structures cannot be assured at the program level. Thus, the SYCP Final PEIR identifies impacts to important historical resources as potentially significant and unavoidable at the program level.

According to the SYCP Final PEIR, important religious or sacred resources are anticipated to occur within the SYCP area. Future development pursuant to the SYCP could have a significant impact on religious or sacred sites. Due to the sensitive nature of sacred and religious places, the SYCP Final PEIR identifies impacts associated with future projects pursuant to the SYCP as significant. Additionally, the SYCP Final PEIR identifies the possibility of encountering subsurface human remains during future development pursuant to the SYCP as a potentially significant impact. As discussed above, the SYCP Final PEIR Mitigation Framework Measure HIST-1 establishes mitigation for archaeological and tribal cultural resources, and would be applied to reduce impacts to religious or sacred sites. Mitigation Framework HIST-1 contains specific guidance regarding actions to be taken in the event human remains are encountered. Implementation of actions pursuant to Mitigation Framework Measure HIST-1, combined with SYCP policies promoting the identification and preservation of significant resources and compliance with CEQA and Public Resources Code Section 21080.3.1, requiring tribal consultation, reduces impacts associated with important religious or sacred uses and with human remains to a less than significant level.

## **PROPOSED PROJECT**

A Cultural Resources Assessment was conducted for the project (LSA Associates, Inc., September 2015). The Cultural Resources Assessment included research and a field survey. A cultural records search was completed at the South Coastal Information Center (SCIC) at San Diego State University. Records and maps were examined for a quarter-mile radius around the project site. A total of 10 cultural resource studies have been conducted and one cultural resource has been identified within a quarter-mile of the project site. One cultural resources study with negative results occurred within the project site. The cultural resource within a quarter-mile of the project site is a segment of the Union Pacific Railroad. Historic topographic maps and aerial photographs were recorded within the project area. A Sacred Lands File (SLF) search was conducted with the Native American Heritage Commission. Based on the results of the SLF, no Native American resources have been recorded within the project site.

During the field survey, one newly recorded historic resource (CA-SDI-21642) and one prehistoric resource (CA-SDI-21643) were observed. Site CA-SDI-21642 represents a historic-age water catchment basin from the mid-20<sup>th</sup> century, while Site CA-SDI-21643 is a sparse, prehistoric lithic scatter. Both resources are described below.

CA-SDI-21642 consists of a historic-age water catchment basin feature and no associated artifacts. The site dates to the mid-20th century and exhibits poor integrity. It is filled with nonnative soil, so the likelihood of a subsurface deposit associated with the feature is low. It is not likely eligible for listing in the California Register, as it is not associated with an important historical event or significant individual, does not represent unique architectural design, or have potential to contribute important information to the historical or archaeological record.

CA-SDI-21643 consists of a sparse, prehistoric lithic scatter. The site is made up of five pieces of debitage, including three secondary flakes, one tertiary flake, and one secondary piece of angular waste. All of the flakes were made from a light greenish-gray, aphanitic, metavolcanic material. No evidence of a subsurface deposit was observed. Though the locations of the debitage were recorded, it is possible more artifacts exist beneath the site. It does not appear to be associated with an important event or person significant to history, lacks an architectural element, and does not have potential to contribute important information because it is sparse and superficial. No diagnostic, datable artifacts are present which could provide important information about prehistoric lithic technology.

Consultation by the City with representatives of the lipay Nation of Santa Ysabel and the Jamul Indian Village was conducted to determine if the project site contained Tribal Cultural Resources, consistent with the requirements of Assembly Bill 52. During consultation, the tribal representatives reviewed the Cultural Resources Assessment that was conducted for the project (LSA Associates, Inc., September 2015). The tribal representatives requested that shovel test pits be excavated to determine if Site CA-SDI-21643 was significant. An archaeological testing program was initiated to evaluate CA-SDI-21643 for listing in the California Register of Historical Resources (California Register), in accordance with the City Historical Resources Guidelines. Testing and evaluation included subsurface exploration within the boundary of Site CA-SDI-21643 (LSA Associates, Inc., September 2017). The testing program consisted of the excavation of six shovel test pits. The testing endeavor determined that no subsurface cultural deposits were present within the project site boundary for CA-SDI-21643. The testing effort determined that the site does not satisfy the eligibility requirements necessary for inclusion into the California Register. The site does not contain subsurface contexts that promote additional information for regional historic and prehistoric backgrounds, nor does it exhibit the potential to answer important research questions. Due to the lack of subsurface archaeological contexts, minimal soil development, loped landform contexts, and a sparse scatter of surficial artifacts, Site CA-SDI-21643 was determined to be less than significant. The tribal representatives and City staff reviewed and concurred with the results of testing described above. The consultation required by Assembly Bill 52 was completed and closed on September 21, 2017 and no monitoring, including Native American monitoring, is required for the project. Impacts to historical resources and Tribal Cultural Resources would be less than significant.

As discussed in *Land Use*, the project's Cultural Resources Survey (LSA Associates, Inc., 2015) and subsequent testing and evaluation (LSA Associates, Inc., 2107) did not identify new significant

impacts that were not already anticipated in the SYCP Final PEIR. Thus, no new impacts to historical resources would occur as a result of the project. The project has complied with SYCP Mitigation Framework Measure HIST-1 by conducting the required investigations at the site. Based on these investigations, the project would not result in significant impacts associated with historical resources or Tribal Cultural Resources. SYCP Mitigation Framework Measure HIST-2 is not applicable to the project, as it applies to historic buildings, structures, and objects. No such items are present at the project site.

#### Visual Effects and Neighborhood Character

#### FINAL PEIR

As discussed in the SYCP Final PEIR, no scenic roadways, scenic vistas, or scenic corridors were identified within the SYCP area in the General Plan, the 1990 San Ysidro Community Plan, or the SYCP. Visual resources in the SYCP area include the Dairy Mart Ponds, Tijuana River Valley, and eastern hillsides adjacent to the Otay Mesa Community. The Dairy Mart Ponds are one of the few remaining undeveloped natural areas with the SYCP area and consist of a natural riparian corridor that is connected to the Tijuana River Valley. The ponds are designated as open space in the SYCP area and no development is proposed within them as part of the SYCP, with the exception of a roadway connection between Calle Primera and Camino de la Plaza. Three potential options for this connection are identified in the SYCP, each of which includes a low bridge over a portion of the Old Tijuana River, southeast of the Dairy Mart Ponds. This new connection would not be a prominent visual feature within the viewshed of the Dairy Mart Ponds and would not substantially block views of the Dairy Mart Ponds from public viewing areas. The Tijuana River Valley is located immediately west of the SYCP area, and expansive views across the low-lying valley are provided from some public vantage points within the SYCP area. While development would occur within areas of the SYCP that could, to varying degrees, obstruct views of the river valley, the SYCP contains policies to protect views across the valley. Land Use Element Policy 2.2.7 calls to "site structures to preserve and enhance public scenic vistas and open space areas, particularly those with views of Tijuana, the Tijuana River Valley, and the Pacific Ocean." SYCP Urban Design Element Policy 4.2.6 states "Encourage building design to take advantage of urban views of Tijuana River Valley and Tijuana." The steep slopes along the eastern boundary of the SYCP area are another one of the community's major visual resources. These hillsides are mostly undeveloped, but the SYCP designates portions of these areas for future development upon preparation of a Specific Plan (SYCP Land Use Policy 2.7.1). The Specific Plan would contain additional policies and design guidelines for future development with respect to massing of buildings that would affect views of the hillsides. SYCP Conservation Element Policy 8.2.1 states "Implement the Environmentally Sensitive Lands regulations, related to biological resources and steep hillsides, for all new development. Plan development to minimize grading and relate to the topography and natural features of the San Ysidro Hillsides." As discussed above, implementation of the SYCP would not substantially alter or block public views from public viewing areas within the SYCP area because the SYCP contains policies intended to protect views of open space areas (Dairy Mart Ponds and eastern hillsides) and the Tijuana River Valley. The SYCP Final PEIR identifies impacts related to public views and view blockage as less than significant.

Proposed gateways are important SYCP features that would provide additional visual landmarks to enhance the overall visual quality of the community. Views of gateways would be provided from

public viewing areas near the gateway locations; therefore, the SYCP Final PEIR identifies impacts associated with gateways and view blockage as less than significant.

The SYCP area is divided into five distinct residential neighborhoods, two neighborhood villages, two commercial districts, and the Port of Entry district. The SYCP contains specific policies to guide development within these neighborhood areas based on the characteristics of the built environment, and the existing and desired land use pattern. The land use plan, policies and recommended mobility enhancement of the SYCP, along with implementation of the LDC, would provide for future development that is compatible with the neighborhood character of neighborhood districts identified in the SYCP as well as the community as a whole. For this reason, the SYCP Final PEIR identifies impacts associated with changes to neighborhood character as a less than significant impact.

Most of the SYCP area is generally flat, with level terrain in the southern extent of the SYCP and level to gently sloping areas in the central and northern urbanized portions of the SYCP area. Moderately sloping to steep hillsides occur in the eastern portion of the SYCP area, east of I-805. Elevations within the SYCP area range from approximately 45 feet amsl in the lower-lying southern SYCP area to 380 feet amsl in the hillsides east of I-805. Future development proposed in the SYCP would occur in already developed areas characterized by generally level topography and absence of natural landforms. A future roadway connection over the Dairy Mart Ponds is recommended in the SYCP, however, it would not substantially change existing landforms in the area. Additionally, hillsides in the eastern portion of the SYCP would be required to comply with the Specific Plan required by policy in the SYCP and applicable regulatory guidelines. For these reasons, the SYCP Final PEIR identifies potential impacts associated with landform alteration as less than significant.

#### **PROPOSED PROJECT**

The project site is currently undeveloped hillside, sloping generally southwest, with elevations ranging from 130 to 215 feet amsl. The project would result in grading of the site with fill slopes and installation of retaining walls. Project implementation would require grading of 100 percent of the site, with 67,890 CY of cut and a maximum depth cut of 40 feet. Project implementation would require 10,040 CY of fill at a maximum depth of 20 feet. The overall site design for the project allows many of the lots to capture the expansive views to the southwest of the site. Plantings have been selectively placed to enhance these views. The project site would be developed consistent with development regulations contained in the LDC, such as setbacks, landscape screening, and other standards and would be landscaped in accordance with a City-approved landscaping plan. The project proposes buildings with a maximum height of 30 feet. The landscaping plan includes ground cover and 24-inch box trees along Smythe Avenue, as well as ground cover/shrubs and a combination of 15-gallon and 24-inch box trees along Smythe Avenue would be planted with groundcovers and vines. Additional shrubs and trees would be provided throughout the project. The grading and landscape plans are subject to the City's final review and approval prior to implementation.

Protection of open space and scenic resources in the SYCP area would occur as a result of policies established in the SYCP. SYCP Policy 8.2.1 recommends planning development to minimize grading and relate to the topography and natural features of the San Ysidro hillsides. The graded development pads on the project site would step down with the topography to the south. The site

design for the project has been developed to minimize grading and achieve the density allocated by the community plan.

The SYCP contains the following policy (Policy 2.2.7):" Site structures to preserve and enhance public scenic vistas and open space areas, particularly those areas with views of Tijuana, the Tijuana River Valley, and the Pacific Ocean." Views south to Tijuana would be maintained along the Smythe Avenue corridor. Smythe Avenue is not a scenic vista or overlook, according to Figure 4-21 of the SYCP, *Scenic Overlooks and Vistas*. The existing property frontage along Smythe Avenue consists of a large, steep cut slope (1.5:1 slope, up to 45 feet in height) as a result of previous grading. The slope does not contain irrigated erosion control plantings and is sparsely vegetated. Thus, project grading would reduce the elevation of the site, therefore, the proposed retaining wall along Smythe Avenue would have a lower overall visible height than, with the existing cut slope. The existing cut slope is at a maximum height of 45 feet while the proposed retaining wall would be at a maximum height of 26 feet. Based on the reduction of slope height (compared to the current condition), the landscaping and greenery proposed to soften the visual effect of the retaining wall, and the lack of designation of Smythe Avenue as a scenic resource, vista, or overlook, the project would not result in a significant impact associated with views from a public vantage point associated with the San Ysidro Community Plan.

The project would involve the development of a vacant infill site with 44 two-story, detachedcondominium units on a site zoned for medium-density residential use. The maximum height of the two-story residential structures would be 30 feet, consistent with the RM-1-1 zone. The graded development pads would step down with the topography to the south. While the project would change the overall character of the site, the project site is designated for residential uses consistent with the use proposed. As discussed above, the project includes landscaping consistent with City requirements.

One of the two proposed retaining walls would be located along the Smythe Avenue property frontage. The proposed retaining wall would be approximately 460 feet in length, ranging in heights from 0 to 26 feet. A 6-foot sidewalk would be constructed along this portion of Smythe Avenue, with 4.25 feet of landscape buffer on both sides of the sidewalk. A second retaining wall would be located along the interior subdivision private driveway, would be 560 feet in length, and ranging in height from 0 to 26 feet. The Smythe Avenue property frontage currently consists of a large, steep cut slope (1.5:1 slope, up to 45 feet in height), which is unmaintained and sparsely vegetated. The overall length and maximum height of the proposed retaining wall is comparatively large and requires a deviation due to its height. The proposed landscaping would provide adequate softening and screening of the retaining wall as well as the project's grading impacts. Additionally, the plantable retaining wall would provide a source of visual interest, with greenery, which would improve views along Smythe Avenue. The landscape buffer at its base would provide an additional layer of landscaping. The landscape buffer would provide plantings in the foreground, with the plantable MSE adding texture and visual interest with variable plantings along the wall surface. The placement of trees on the graded slopes of the project, as well as along the street frontage of Smythe Avenue would serve to break up the large retaining wall. While the proposed project would result in changes to the existing visual character of the site, the project would develop the site consistent with planned land use designation in the SYCP and the existing surrounding residential uses and would be subject to City review for the design and landscaping of the property. For these

reasons, the project would not substantially degrade the existing visual character or quality of the site.

In summary, the project site is not designated as open space, a scenic resource, scenic vista or overlook by the SYCP. The site would be developed consistent with policies contained in the SYCP. While the project would require grading of the whole site, the project site does not contain significant landforms and has been designated for development with residential uses. Landscaping is proposed to soften and screen the visual effects of project grading, including the proposed retaining wall along Smythe Avenue. The landscape design would adequately soften the visual effect of graded slopes, the proposed retaining wall and the development area from public view. For these reasons, the project would not have a substantial adverse effect on a scenic vista or block scenic views and no new impacts would occur. The project's impacts are consistent with those identified in the SYCP Final PEIR and are less than significant. Impacts would be less than significant and no new impacts beyond those analyzed in the SYCP Final PEIR would result.

#### Human Health/Public Safety/Hazardous Materials

#### FINAL PEIR

The SYCP Final PEIR identifies 24 sites that are considered to pose a high risk for environmental contamination in the SYCP area. Implementation of the SYCP land uses could potentially expose people or sensitive receptors to significant health hazards related to hazardous materials. This exposure could occur by locating proposed uses that would include habitation or on-site congregation of people or sensitive receptors within or near listed hazardous materials sites, retaining existing uses that potentially use hazardous materials in the vicinity of sensitive land uses, and/or through the transport of hazardous materials through the area in associated with existing and proposed uses. The SYCP included a number of design considerations that would help to avoid or reduce the described hazardous material impacts, including excluding heavy industrial land uses. Additionally, all future development and redevelopment activities under the SYCP would be required to conform to applicable regulatory/industry and code standards related to health hazards from hazardous materials. The SYCP Final PEIR identifies less than significant impacts related to hazardous materials and associated health hazards from implementation of the SYCP. Such hazards would be avoided or reduced below a level of significance through mandatory conformance with applicable regulatory/industry standards and codes, including approval from the County Department of Environmental Health/Hazardous Materials Division (DEH/HMD).

Potential flood hazards in the SYCP area include the 100-year floodplain, tsunami and seiche-related floods, and dam inundation associated with failure of the Rodriguez Dam, located approximately 10.5 miles southeast of the SYCP area along the Tijuana River in Mexico. Potential flood hazards associated with the SYCP Final PEIR are identified as a less than significant impact, based on the following considerations: (1) most proposed SYCP development is located outside of the 100-year floodplain; (2) all proposed SYCP development is located outside of potential tsunami/seiche inundation areas; and (3) mandatory requirements for compliance with regulatory requirements related to development within 100-year floodplains, and dam safety and security in Mexico.

Brown Field Municipal Airport is located approximately 2.5 miles northeast of the SYCP area and the Imperial Beach NOLF is located approximately 1.7 miles to the west of the SYCP area. The SYCP area

is not located within any mapped Accident Potential Zones (APZs) for either airport. The SYCP area is within an FAA notification area. Additionally, the northern portion of the SYCP area is located within Review Area 2 of Brown Field Municipal Airport's Influence Area and is within Imperial Beach NOLF Review Area 2 boundaries. Applicable proposed development within these areas require review and approval from appropriate oversight agencies (including the FAA and the San Diego Airport Land Use Commission) prior to the issuance of approvals such as building permits. No airports or related APZs are located within or adjacent to the SYCP area. As such, the risk for aircraft-related risks to the population within the SYCP area are identified as low in the SYCP Final PEIR and impacts are identified as less than significant.

The City participates in the San Diego County Multi-Jurisdictional Hazard Mitigation Plan (MHMP), a countywide plan to identify risks and minimize damage from natural and man-made disasters. The San Diego Office of Homeland Security (SD-OHS) oversees the City Homeland Security, Disaster Preparedness, Emergency Management, and Recovery/Mitigation Programs. The City is also a participating agency in the County Unified San Diego County Emergency Services Organization and County of San Diego Operational Area Emergency Operations Plan (EOP). The EOP identifies primary evacuation routes as the major interstates, highways, and prime arterials within San Diego County, including I-5, I-805, and SR-905 in the SYCP area. There are no goals or objectives of the SYCP that would interfere with or diminish the capacity of the identified emergency response and evacuation plans. Identified roadway improvements included in the SYCP, while intended to address traffic-related issues, would also improve access capabilities for response vehicles and personnel in emergency situations. Development proposed under the SYCP would be required to comply with applicable City emergency preparedness and response criteria under MHMP and SD-OHC guidelines. The SYCP Final PEIR identifies potential impacts related to impairment of or interference with adopted emergency response and evacuation plans as less than significant, based on the nature of the proposed SYCP development and required compliance with associated criteria under MHMP, SD-OHC, and EOP guidelines.

The SYCP area contains a number of areas designated as "high risk" for fire hazards. These areas are associated with the occurrence of native habitat in areas such as the undeveloped portion of the eastern (east of I-805) and southern (south of I-5) SYCU areas, as well as several pockets of native or restored vegetation within existing development or along freeway corridors. The remaining portions of the SYCP area are largely urbanized, with a low potential for wildfire hazards. Implementation of development under the SYCP within or adjacent to high risk fire hazard areas would be subject to applicable state and City regulatory requirements related to fire hazards and prevention, including vegetation (brush) management and incorporating applicable fire-related design elements (fire-resistant building materials, fire/ember/smoke barriers, automatic alarm and sprinkler systems). These requirements would be implemented on a project-level basis. The SYCP Final PEIR identifies potential impacts related to wildfire hazards as less than significant, based on compliance with applicable state and City standards associated with fire hazards and prevention.

## **PROPOSED PROJECT**

The project would consist of residential development, which would not involve the routine transport, use, or disposal of hazardous materials. During construction activities, small amounts of hazardous materials may be present on site (such as fuels, lubricants, solvents, etc.); however, these materials would be present in small quantities and typical of those used in construction activities. These

materials would be stored, handled, used, and disposed of in accordance with applicable regulations and requirements, and would not create a significant hazard to the public or environment.

The project site is not located within a 100-year flood hazard area. The project site is also not in an area that would be subject to flooding associated with a tsunami or a seiche.

The nearest airports to the project site include NOLF Imperial Beach to the west and Brown Field Municipal Airport to the east. Both of these airports are located approximately three miles from the project site. The Tijuana International Airport is also located approximately 3.2 miles southeast of the project site. The project site is not located within the airport land use plan or within two miles of any of these airports. The project would not result in a safety hazard associated with airports for people residing or working in the project area.

The project does not propose elements which would impair implementation of or physically interfere with an adopted emergency response plan or evacuation plan. The proposed development would occur entirely within the project site, with some improvements occurring along Smythe Avenue. During construction activities along Smythe Avenue, traffic access would be maintained, although lane closures may be required. A traffic control plan would be prepared for the project and would be subject to review and approval from the City prior to the start of construction. Construction activities and associated traffic restrictions on Smythe Avenue would be conducted according to City standards and the project's traffic control plan. In addition, during the long-term operation of the project, two access points (the proposed driveway that connects to Smythe Avenue and the proposed secondary access that would connect to Camino De Progresso) to the project would be maintained, ensuring access for emergency response. The project would not interfere with implementation of an emergency response or evacuation plan.

The project site is located within an area identified as an "Official Very High Fire Hazard Severity Zone" by the City of San Diego Fire-Rescue Department (Official Very High Fire Hazard Severity Zone Map, February 24, 2009) and as a High Fire Risk Area in the City's General Plan EIR (Figure 3.5-3). While the project is designated as a high fire risk area, it is located in an urban/developed area, surrounding by existing development. The project would be in-fill housing developed consistent with City design and landscaping requirements, and was subject to review and approval from the San Diego Fire Rescue Department. The project would also remove remnant native habitat that currently occurs immediately adjacent to existing homes, thus reducing the existing risk from wildfire. For these reasons, the project would not expose people or structures to a significant risk of loss, injury, or death from wildfires.

In summary, the potential for health and public safety impacts through implementation of the project would be consistent with the SYCP Final PEIR, and less than significant. Therefore, no new impacts would occur as a result of the project.

## Hydrology, Water Quality, and Drainage

## FINAL PEIR

Development pursuant to the SYCP has the potential to change surface runoff characteristics, including the volume of runoff, rate of runoff, and drainage patterns. An increase in the volume or

rate of runoff or a change in drainage patterns could result in flooding or erosion. The SYCP Final PEIR analyzes impacts associated with changes in surface runoff for the local "on-site" perspective, as well as for the watershed perspective. From the local "on-site" perspective, all development is subject to drainage and floodplain regulations in the SDMC and would be required to adhere to the City's Drainage Design Manual and Strom Water Standards Manual. Therefore, future development associated with the SYCP would have a reduced volume and rate of overall surface runoff compared with the existing condition (due to referenced City requirements), resulting in a less than significant impact. From the floodplain perspective, the SYCP Final PEIR identifies less than significant impacts due to future projects' compliance with floodplain regulations.

As discussed in the SYCP Final PEIR, future development projects pursuant to the SYCP have the potential to change pollutant discharges either from an increase in the volume of storm water runoff or from addition of new sources of pollution. Increased runoff is not expected to be a factor in future pollutant loads because the SYCP is currently highly impervious, and because new storm water regulations require implementation of Low Impact Development (LID) practices that retain a portion of storm water on site for infiltration, re-use, or evaporation. According to the SYCP Final PEIR, regardless of land uses, sources of pollution can be expected to decrease with future development of the SYCP area because new storm water regulations require implementation of permanent storm water BMPs to reduce storm water pollution. Much of the existing development in the SYCP was constructed prior to the adoption of storm water regulations and do not include LID practices to reduce pollution or runoff volume or storm water BMPs into project design to address the potential for transport of pollutants of concern through either retention or filtration. The implementation of LID design and storm water BMPs would reduce the amount of pollutants transported from the SYCP to receiving waters, resulting in a less than significant impact.

Future development within the SYCP area has the potential to improve groundwater quality through removal of potential sources of groundwater contamination. Vehicular traffic, speed and braking, vehicle characteristics such as age and maintenance, road maintenance practices, societal practices, and pavement composition and quality are all factors that affect pollutant concentrations from roadways. Current storm water regulations that require infiltration of storm water runoff, where feasible, include design requirements for protection of groundwater. Because future development would adhere to the requirements of the MS4 permit for the San Diego Regional and the City's Storm Water Standards Manual, water quality is not expected to be significant impacted by the future development within the SYCP area. The SYCP Final PEIR identifies potential water quality impacts as less than significant.

## **PROPOSED PROJECT**

A Preliminary Drainage Report was prepared for the project (SB&O, Inc., October 16, 2014). The following information regarding the pre- and post-construction drainage is based on the Preliminary Drainage Report. The property is currently undeveloped hillside, sloping generally southwest. Topography on the site is generally steep (10 to 20 percent). The Smythe Avenue property frontage consists of a large, steep cut slop (1.5:1 slope, up to 45 feet in height). An existing concrete brow ditch is located at the top of the Smythe Avenue cut slope. Drainage from a majority of the site is intercepted by the brow ditch and routed to the southwest corner of the project site. The northern end of the brow ditch is connected to a curb inlet at the northwest corner of the project site.

Surface runoff from the cut slope along Smythe Avenue flows down slope and discharges directly to the gutter along Smythe Avenue. The southeastern portion of the project site flows overland to the residential properties to the south, located along Foothill Road. Runoff continues southerly to Beyer Boulevard, then easterly in the gutter. Storm water is intercepted by the curb inlets in a localized sump approximately 300 feet east of the Smythe Avenue/Beyer Boulevard intersection. The storm drain continues southerly to the trolley right-of-way (south of Beyer). The site is tributary to the Tijuana River, located approximately 1.5 miles southwest of the site.

Site grading and development would maintain the general east to west drainage pattern of the site, with discharge to the Smythe Avenue gutter. The majority of the developed site runoff would be collected, treated, and discharged approximately 100 feet south of the driveway entry on Smythe Avenue. The concrete brow ditch constructed at the top of the Smythe Avenue cut slope would remain south of the driveway entry. This ditch flows southerly and then discharges to the Smythe Avenue gutter at the southwest corner for the project site. The fill slope in the southwestern portion of the site (below the developed pads) would include terrace and drainage ditches, which would connect to the existing concrete ditch above the Smythe Avenue cut slope. The southeastern portion of the site that currently flows southerly to the residential properties along Foothill Road would be intercepted by a ditch and curb outlet near the southwest corner of the project site. A small portion of the site located north of the Smythe Avenue project entry/driveway would be connected to the existing inlet located just north of the project site. This portion of the site would consist of landscape slope areas above the retaining walls near the project entrance/driveway.

Following construction of the project, the site runoff would continue southerly to Beyer Boulevard, then easterly into the gutter, as described for the existing condition. Based on the described modifications to the drainage for the site, post-construction drainages would reach the gutter along Beyer Boulevard, and then continue to the localized sump approximately 300 feet east of the Smythe Avenue/Beyer Boulevard intersection, and continue southerly to the trolley right-of-way (south of Beyer). Although drainage on the project site would be modified, the drainage pattern in the project area would not be substantially modified and would not cause substantial erosion of siltation, on or off site. Additionally, the project would implement BMPs as identified in the Priority Development Project Stormwater Quality Management Plan (PDPSWQMP) (SB&O, Inc., September 2017) and City of San Diego Storm Water Standards. Landscaping associated with the project would be installed consistent with City landscaping design requirements, which would further reduce the potential for runoff from the project site to occur. The project's runoff impacts would be consistent with those identified in the SYCP Final PEIR and no new impact would occur.

A (PDPSWQMP) identified the project as a Priority category that is required to implement structural BMPs, Treatment Control, and Hydro-Modification Plan measures. A dry-well storm water treatment facility is proposed in the northwestern portion of the site near the site entrance; an underground storm water detention/storage facility would be developed at the common open space area in the northwestern portion of the site. Outflow from the detention facility would be directed to the infiltration facility dry well prior to its discharge. Additionally, the project would be required to comply with all storm water quality standards (including the City of San Diego's Storm Water Standards and storm water construction requirements of the State Construction General Permit, Order 2009-009-DWQ) during and after construction and appropriate BMPs would be implemented. Based on these considerations, the project would not violate water quality standards or waste

discharge requirements and would not result in significant impacts associated with pollutant discharge or water quality. The project's runoff impacts would be consistent with those identified in the SYCP Final PEIR and no new impact would occur.

## **Population and Housing**

## FINAL PEIR

The SYCP Final PEIR identifies a less than significant impact related to displacement of residents. Displacement of population or housing stock would occur if existing housing is demolished for future development; however, under the SYCP, any displacement would be temporary. Total housing stock within the SYCP area would remain the same or increase compared to existing levels and compared to those allowed in the 1990 San Ysidro Community Plan. The availability of multifamily housing would be substantially increased, and the potential for new single-family housing would decrease. No currently designated residential units would be redesignated to non-residential uses. Under the SYCP, a total of 9,850 dwelling units would be available, an increase of over 2,588 units compar3ed to 2008 levels, and an increase of 1,762 units compared to build-out of the 1990 San Ysidro Community Plan.

Based on the SYCP Final PEIR, no new or major expansion of infrastructure serving the SYCP area was anticipated to occur as a result of implementation of the SYCP. The SYCP redesignated some existing industrial and commercial areas to permit residential uses to accommodate expected population growth and increased densities of certain residential areas in accordance with City policies, goals, and regulations. The SYCP Final PEIR indicates that the existing infrastructure within San Ysidro in able to support the anticipated population without major additions or expansions which could accommodate growth. The existing roadway network can accommodate the additional traffic associated with the increase in population through relatively minor roadway improvements including restriping, new turn lanes, and signalization. The extension of Calle Primera to Camino do la Plaza would not provide substantial new access because access to the Camino de la Plaza currently exists to the north and south of the proposed extension. The extension was also included in the 1990 San Ysidro Community Plan. The SYCP includes a number of planning, design and implementation strategies intended to accommodate growth and provide sustainable economic development. As such, the SYCP Final PEIR identified impacts associated with growth inducement as less than significant.

#### **PROPOSED PROJECT**

The project site does not contain existing housing and would not displace people or housing. The project is consistent with the residential land use designations for the project site identified in the SYCP. As such, development of 44 multi-family housing units proposed by the project would be consistent with the expected population increase attributable to the project site. The project includes development on the project site as well as improvements along Smythe Avenue. The project does not include the construction of new or extended infrastructure that would stimulate growth in the area. The project includes development of 44 new residential units on an infill property that is surrounded by existing residential development. The development of an infill piece of property that does not provide new or extended infrastructure to a previously unserved area would not induce substantial population growth, either directly or indirectly. The project's proposed

44 units would be consistent with what was envisioned in the SYCP Final PEIR and no new population impacts would result. No mitigation is required.

## **Public Services**

## FINAL PEIR

#### Police Protection

Police Service are provided to the SYCP area by the Southern Division of the San Diego Police Department, located at 1120 27<sup>th</sup> Street. The SYCP area is patrolled by Beats 712 and 714. Average response times for Beats 712 and 714 are below the General Plan response times for all Call Priority Levels. The SYCP Final PEIR estimates the projected population of the SYCP area at buildout to be 38,700 residents, with an existing population for the area of 28,008. The SYCP Final PEIR identifies a potential increase in police response times associated with buildout of the SYCP; however, SYCP policies would enhance police protection in the community. Additionally, police staffing or facilities would be dependent on division and citywide needs and is not based on individual projects such as the SYCP. The SYCP Final PEIR identifies a program-level less than significant impact for police protection services.

#### Fire Protection

Fire protection services within the SYCP area are provided by the City of San Diego Fire-Rescue Department (SDFD). The SYCP area is served by three fire stations, including Fire Station 29 (located at 198 West San Ysidro Boulevard), Fire Station 6 (located at 693 Twining Avenue), and Fire Station 30 (located at 2265 Coronado Avenue). The SYCP Final PEIR identifies an increased need for fire protection services with the SYCP area, based on buildout of the SYCP. No new fire stations are planned for the SYCP area; however, planned construction of Fire Station 49 in nearby Otay Mesa would provide emergency response coverage to the west end of the SYCP area, minimizing burden on the existing fire stations serving the SYCP area. With construction of the planned Fire Station 49, the SYCP Final PEIR identifies a less than significant impact for fire protection services.

#### Schools

According to the SYCP Final PEIR, the SYCP area is served by three school districts: the South Bay Union School District (SBUSD) and the San Ysidro School District (SYSD) serve the community's preschool through eighth grade students; the Sweeter Union High School District (SUHSD) serves the community's high school students. The schools within that serve the SYCP area are: Willow Elementary School (K-5), Beyer Elementary School (K-5), Sunset Elementary School (K-5), Smythe Elementary School (K-5), Nicoloff Elementary School (K-5), La Mirada Elementary School (K-5), San Ysidro Middle School (6-8), Southwest Middle School (6-8), Montgomery Middle School (6-8), Southwest High School (9-12), Montgomery High School (9-12), San Ysidro High School (9-12), Southwestern College Higher Education Center, and San Ysidro Adult School. Beyer Elementary School was demolished in 2012 and no longer serves as an operating school. The site will eventually be redeveloped into a new elementary school. Aside from Beyer Elementary School, no new school facilities are planned within the SYCP area. The SYCP Final PEIR determined that the payment of statutory fees by future development would result in a less than significant impact to school facilities. Additionally, no new school facilities are anticipated to serve the SYCP area at buildout; capacity exists at current facilities to accommodate planned growth.

## Libraries

The SYCP area is currently served by two San Diego Public Library branch libraries - the Otay Mesa-Nestor Library and the San Ysidro Library. The Otay Mesa-Nestor Library is outside of the SYCP, but serves the residents of the SYCP area. The San Ysidro library was built in 1914, and only provides 1,500 square feet of library space, which is severely deficient. The SYCP Final PEIR indicates that a library facility of approximately 15,000 square feet is planned to replace the 1,500-square-foot San Ysidro library. Based on the SYCP Final PEIR, the construction of the planned new library and the existing library would provide adequate library facilities at SYCP building, resulting in a less than significant impact.

#### Parks

The SYCP Final PEIR identifies the need for and/or provision of new park facilities to provide a minimum of 2.8 usable acres of population-based parks per 1,000 residents. Implementation of the SYCP would result in a population-based park requirement of 108.36 acres, and a recreation center requirement of 26,350 square feet using General Plan guidelines. The existing parkland acreage in the SYCP of 41.63 acres, and the SYCP proposed 32.29 acres of new parks throughout the community, resulting in a total of 73.92 acres. Thus, a park deficit of 34.44 acres would occur at the SYCP buildout. Existing recreation centers would be adequate to serve the buildout of the SYCP. New development within the SYCP area would be required to provide park or recreation facilities or payment of the Development Impact Fee (DIF). New parkland or recreational facilities proposed as part of a development. Based on these considerations, the SYCP Final PEIR identifies a less than significant, program-level impact to parks.

#### **PROPOSED PROJECT**

#### **Police Protection**

The project site is in an area served by San Diego Police Department. Residential density associated with buildout of the project would be consistent with the proposed uses of the site analyzed in the SYCP Final PEIR; therefore, population-based impacts associated with the implementation of the project would be consistent with those analyzed in the SYCP. The development of the project site is consistent with that envisioned in the SYCP Final PEIR; thus, no new impacts related to the provision of police protection services would occur.

#### Fire Protection

The project site is in an area served by SDFD. Residential density associated with buildout of the project would be consistent with the proposed uses of the site analyzed in the SYCP Final PEIR; therefore, population-based impacts associated with the implementation of the project would be consistent with those analyzed in the SYCP. The development of the project site is consistent with that envisioned in the SYCP Final PEIR; thus, no new impacts related to the provision of fire protection services would occur.

#### Schools

The project would entail construction of 44 new residential dwelling units, consistent with the planned land use for the project site, the development of which was included in growth projections analyzed in the SYCP Final PEIR. Residential density associated with buildout of the project would be consistent with the proposed uses of the site analyzed in the SYCP Final PEIR; therefore, population-

based impacts associated with the implementation of the project would be consistent with those analyzed in the SYCP. Thus, the number of students generated by the project would be consistent with those envisioned in the SYCP Final PEIR. The project would be required to pay mitigation fees to the applicable school district. No new impacts would result from the proposed project.

#### Libraries

The development of the project site is consistent with that envisioned in the SYCP Final PEIR and would not generate more library users than anticipated in the SYCP Final PEIR. Thus, the project's impact on library services would be consistent with those identified in the SYCP Final PEIR and no new impact would occur.

#### Parks

While the project would generate new park users which would utilize local parks, the proposed development is consistent with the underlying land use designation identified in the SYCP, and thus, has been considered as part of the Final PEIR analysis. As discussed in the SYCP Final PEIR, new development would be required to provide park or recreation facilities or pay the DIF. The project's parks impacts would be consistent with those identified in the SYCP and no new impact would occur.

## Public Utilities

#### FINAL PEIR

#### Water Supply

A Water Supply Assessment (WSA) was prepared for the SYCP. Based on this WSA, there is sufficient water planned to supply the proposed SYCP's estimated annual average demand of 2,873 acre-feet per year (AFY). The planned water demand of the 1990 San Ysidro Community Plan was 3,054 AFY. The WSA concluded that the SYCP was consistent with the water demands assumptions included in regional water resource planning documents of the Water Authority and Metropolitan Water District. The SYCP Final PEIR indicates that there is sufficient water supply to serve existing and projected demands of the SYCP, and future water demands within the Public Utilities Department's service area in normal and dry year forecasts during a 20-year projection, and water supply impacts are identified as less than significant.

#### Utilities

The City's existing built areas, including the SYCP area, are currently served by storm water, wastewater, and water infrastructure as well as various communications systems. However, some infrastructure, such as aging pipelines, are in need of replacement. The SYCP area's existing infrastructure deficiencies would require capacity implements and replacement schemes to serve the existing and projected population.

<u>Water Distribution</u>. No major capacity updates are anticipated to be needed to meet the ultimate demand associated with SYCP buildout because of the available pressures and well-looped piping network. As individual projects move forward, a site-specific analysis would be required to address water service, including meeting new fire flow requirements. Necessary infrastructure improvements would be standard practice for new development to maintain the existing system. As

such, the SYCP Final PEIR identifies impacts associated with water distribution as less than significant.

Wastewater Collection, Treatment, and Disposal. Planned improvements to the City's wastewater infrastructure would increase City wastewater treatment capacity to serve an estimated population of nearly 3 million through the year 2050 when nearly 340 million gallons per day of wastewater are anticipated to be generated. The SYCP acknowledges the need to provide systematic improvements and gradual replacement of utility infrastructure, including wastewater infrastructure. The wastewater collection system in the SYCP will require upgrading in the future and portions of truck sewer segments have been identified by the Public Utilities Department as being deficient and may require replacement between the years 2022 and 2030. As discussed in the SYCP Final PEIR, as individual development projects are initiated under the SYCP, localized improvements to the wastewater system would be required as part of the project design and review. Necessary infrastructure improvements would be standard practice for new development to maintain the existing system. As such, the SYCP Final PEIR identifies impacts associated with wastewater infrastructure as less than significant.

Storm Water Conveyance. Because the SYCP area is highly impervious, the volume or rates of runoff are not likely to be increased by new development. The volume and rate of runoff could be slightly decreased with new development due to storm water quality regulations which require implementation of LID practices that retain a portion of storm water on site for infiltration, re-use, or evaporation. As discussed for water distribution and wastewater infrastructure above, systematic improvements to storm water facilities throughout the SYCP are expected to be provided as gradual replacement of aging and substandard infrastructure is needed. Upgrades to storm water facilities are administered by the City's Transportation and Storm Water Department. Infrastructure improvements would be standard practice for new development to maintain the existing system. Therefore, impacts associated with storm water conveyance would be less than significant.

<u>Communications</u>. The existing communication services are expected to be able to serve future development within the SYCP area without major physical improvements. As such, the SYCP Final PEIR identifies impacts associated with communications in the SYCP area as less than significant.

#### Solid Waste and Recycling

Development projects that would result from implementation of the SYCP would be required to comply with numerous solid waste regulations to address the requirements for refuse and recyclable materials deposit, diversion, and storage in an effort to achieve the City's overall 75 percent diversion goal. Future discretionary projects that would exceed the City's Significance Threshold for solid waste generation (60 tons or more of solid waste) would be required to prepare a Waste Management Plan (WMP) with site-specific waste reduction measures to meet the state-mandated diversion rate. It is anticipated that the solid waste disposal needs of future residents and businesses would increase as a result of implementation of the SYCP. Future developments allowed under the SYCP would be evaluated on a project-specific basis for potential impacts to solid waste facilities. As such, impacts are identified on a program level as less than significant.

#### Energy

The SYCP Final PEIR identifies less than significant impacts associated with the use of excessive amounts of electrical power, fuel, or other forms of energy. Development pursuant to the SYCP

would adhere to applicable energy conservation measures required by applicable energy conservation regulations (such as the California Green Building Code) and energy conservation policies included in the SYCP would avoid excessive energy consumption from operations associated with future development pursuant to the SYCP. Impacts are less than significant.

## **PROPOSED PROJECT**

#### Water Supply

The proposed project is consistent with SYCP land use designations for the site. As such, the water demand from the project site would have been projected and included in the overall WSA prepared to support the SYCP. The project's water demand would be less than levels required by a residential development of more than 500 units; thus, a project-specific WSA is not required in accordance with the SB 610 criteria. Based on the prior assessments, sufficient water supply is available to support existing and projected demands within the SYCP. As such, impacts on water supply associated with the proposed project's demand would be less than significant. The project would be consistent with existing regulations, and General Plan and SYCP policies requiring the use of predominantly drought-resistant landscaping and water conservation measures for landscape maintenance. Impacts are less than significant and no new water supply impacts would occur under the proposed project.

## Utilities

<u>Water Distribution</u>. A 12-inch public water main would be extended from the existing 12-inch water main in Smythe Avenue to the entrance driveway of the project site. The project is located in a residential area with existing infrastructure, and is consistent with the planned uses for the site. Water usage at the site would be typical of residential uses. The project would install water-wise landscaping and plants as specified in the landscaping plan, consistent with City Landscape Water Conservation Ordinance. Turf would be limited to common areas, and all planted areas except for turf would receive a 3-inch layer of bark. The irrigation system would be designed to reduce overall water required for supplemental irrigation. There would be a dedicated water meter for landscape irrigation, and irrigation would include flow and rain sensors. The irrigation delivery method would include a combination of overhead spray, bubblers, and drip irrigation. Irrigation design plans for the project would comply with the City Landscape Water Conservation Ordinance. The project would not require the construction or expansion of existing water distribution.

Wastewater Collection, Treatment, and Disposal. The project is consistent with the planned uses for the site, and is therefore, considered in the overall projected wastewater generation at the SYCP buildout. Wastewater facilities for the project would be operated in accordance with the applicable wastewater treatment requirements of the RWQCB. Treatment of effluent from the site is anticipated to be routine and typical of residential uses in the area. Existing sewer infrastructure exists within the project vicinity. A proposed 8-inch sanitary sewer main would be installed in Smythe Avenue as part of the project, connecting to the proposed subdivision with the existing sewer facility at the intersection with Foothill Road to the south. The project would construct private sewer lines but would not require the construction or expansion of existing wastewater facilities. No new impact would occur under the proposed project. Storm Water Conveyance. While the project would result in the placement of new impervious surfaces at the site, the volume of new storm water runoff generated by the project would not result in substantial quantities requiring new or expanded treatment facilities. Existing infrastructure is in place in the project vicinity, and the project site has been designated to accommodate the storm water infrastructure facilities for development of residential uses. As discussed previously under Hydrology/Water Quality, the project would include the installation of a dry-well storm water treatment facility and an underground storm water detention facility for treatment of storm water. Storm water facilities constructed as part of the project would be designed consistent with City requirements and design guidelines. Impacts associated with storm water infrastructure would be less than significant and no new impact would occur under the proposed project.

<u>Communications</u>. Communications is demand based, and would be provided to the project site. The project is consistent with planned uses for the site and is within an area containing existing infrastructure. Impacts are consistent with those identified in the SYCP and would be less than significant. No new impact would occur.

#### Solid Waste and Recycling

A WMP was prepared for the project (Baranek Consulting Group, October 27, 2015). Based on the WMP, during pre-construction clearing/grubbing and grading, the project would produce 76,277.5 tons of soil material, asphalt, concrete and green waste. All of this material would be diverted from the landfill, for a 100 percent diversion rate during preconstruction. During construction, the project would produce 556 tons of solid waste (wood, concrete, asphalt, drywall, carpet, mixed debris, metals, trash, etc.), and divert 502.3 tons of solid waste materials from the landfill. The diverted material would consist of clean, source-separated (segregated) recyclable and/or reusable material, as well as mixed debris, to be deposited at the recycling/reuse facilities identified in the WMP. Approximately 53.7 tons of solid waste material generated during construction is anticipated to be disposed of as non-recyclable/non-reusable waste at Miramar Landfill, for an overall diversion rate during construction of approximately 90 percent.

During the long-term operation of the project (occupancy), it has been estimated that the project would generate 52.8 tons of waste per year, and would divert 21.1 tons per year to recycling/reuse facilities, resulting in an estimated 40 percent diversion of waste from the landfill. These materials would consist of clean, recyclable materials, gathered in on-site recycling bins and collected by Cityapproved recycling collection providers. Approximately 31.7 tons per year, or 60 percent of occupancy material generated, are estimated to be disposed of as non-recyclable/non-reusable waste at Miramar Landfill. This amount would be reduced further by the use of professional landscape contractors who would be required to divert all landscape greenery directly to a greenery recycling yard. Based on the quantified waste generation and diversion rates discussed above, the project would exceed the 75 percent solid waste diversion rate for waste produced during the construction phases. The project would, however, fail to meet the 75 percent waste reduction target annually once the residences are occupied. Nonetheless, the project would fall below the City's CEQA Significance Determination Threshold (generation of more than 1,500 tons of solid waste materials) for direct impacts to solid waste facilities during construction (i.e., 53.7 tons of C&D materials to Miramar Landfill) and the project would exceed the 75 percent solid waste diversion rate for waste produced during pre-construction and construction by achieving 100 percent and 90 percent diversion rates, respectively.

Regarding cumulative impacts, the project would achieve an average 40 percent diversion of waste via source-separated recycling and would dispose of approximately 31.7 tons of waste per year once the buildings are occupied. This would not exceed the City's CEQA Significance Determination Threshold (of 60 tons or more of waste) for cumulative impacts to solid waste services. These operational diversion rates would be assured when the project provides trash and recycling storage space per the City Storage Ordinance and complies with the City Recycling Ordinance by providing adequate space, bins, and educational materials for recycling during unit occupancy. Therefore, the project's contribution to cumulative solid waste generation would be less than considerable. Less than significant impacts would occur under the proposed project and no new impacts would arise that were not already identified in the SYCP Final PEIR.

#### Energy

Refer to Energy Conservation discussion below. The project would not result in the use of excessive amounts of fuel or other forms of energy during its construction and operation. The project's impacts would be less than significant and consistent with those identified in the SYCP Final PEIR; no new impact would occur.

## Energy Conservation

## FINAL PEIR

The SYCP Final PEIR identifies less than significant impacts related to energy usage and indicates that SYCP implementation would not result in the use of excessive amounts of electricity or fuel in other forms. Development pursuant to the SYCP would adhere to applicable energy conservation measures required by applicable energy conservation regulations (such as the California Green Building Code) and energy conservation policies included in the SYCP would avoid excessive energy consumption from operations associated with future development pursuant to the SYCP. Impacts are less than significant.

## **PROPOSED PROJECT**

The project would require energy usage during construction and during long-term operation. The project would use recycled/sustainable materials for construction and operation to the extent feasible and construction and demolition debris would be recycled, as appropriate. The project would comply with the goals of the City's Conservation Element. The project would not result in the use of excessive amounts of fuel or other forms of energy during its construction and operation. The project's impacts would be less than significant and consistent with those identified in the SYCP Final PEIR; no new impact would occur.

## **Geology/Soils**

## FINAL PEIR

The SYCP Final PEIR identifies a low potential for seismic-related ground rupture hazards due to the lack of known active faults within or adjacent to the SYCP area; however, potential ground rupture hazards cannot be precluded. Additionally, the SYCP is located within a broad, seismically active region characterized by a series of northwest-trending faults associated with the San Andreas Fault

System and as such, the SYCP Final PEIR identifies potentially significant impacts related to seismic ground shaking. Portions of the SYCP area may encompass liquefiable soils. Accordingly, future development activities may be subject to potentially significant impacts related to liquefaction and associated subsidence/settlement. The SYCP Final PEIR identifies lateral spreading potential as remote. The potential for ground lurching is considered low in the SYCP area, with potential impacts identifies as less than significant in the SYCP Final PEIR. All proposed development activities associated with the SYCP would be required to conform with applicable regulatory/industry and code standards related to geologic hazards, including pertinent elements of the Seismic Hazards Mapping Act, Alquist-Priolo Earthquake Fault Zoning Act, California Building Code, and related City standards. Implementation of appropriate measures in conformance with applicable regulatory/industry standards would be mandated through required efforts including completion of appropriate site-specific geotechnical investigations. Based on these requirements, the SYCP Final PEIR identifies geologic hazards associated with surface/fault rupture, ground shaking, liquefaction, subsidence/settlement, and lateral spreading as a less than significant impact.

The SYCP area is approximately 3.5 miles inland, and thus generally not subject to tsunamis. The SYCP area is also not located in proximity to water features capable of generating substantial seicherelated hazards, with the closest such water body consisting of San Diego Bay, located approximately 3.4 miles northwest of the nearest SYCP area. Minor seismically-induced seiches could potentially occur within the Tijuana River and flood channels, but the potential for such hazards within the SYCP area are identified as very low. As such, the SYCP Final PEIR indicates the tsunamis and seiches were found not to pose substantial geological constraints to future development and impacts are less than significant.

A number of known landslide deposits and landslide-prone areas are located in the SYCP (identified as Geologic Hazard Categories 21 or 22 by the City of San Diego Seismic Safety Study). The largest is the San Ysidro Landslide, located on the hillside above East Beyer Boulevard. Future development activities in landslide-prone areas may be subject to potentially significant impacts related to landslides/mudslides and related slope instability hazards. Due to the extensive nature of landslide potential, remedial actions would have to be undertaken on a large scale rather than on a parcel by parcel basis. This potentially significant impact would be mitigated through implementation of SYCP Final PEIR Mitigation Framework Measure GEO-1, which requires a comprehensive geotechnical investigation to address all vacant land within Geologic Hazard Categories 21 or 22. The comprehensive geotechnical evaluation would be required prior to the issuance of the first building permit on vacant land located within Geologic Hazard Categories 21 or 22. The investigation shall identify remedial mitigation measures necessary to stabilize slopes. Remedial measures would be implemented prior to issuance of the first building permit within the affected area and subsequent development shall demonstrate remedial measures have been completed or that the development will implement equivalent remedial measures. Mitigation Framework Measure GEO-1 would reduce landslide/slope instability hazards associated with implementation of the SYCP to below a level of significance.

Potential hazards related to erosion and sedimentation within the SYCP area are generally low in level areas and higher on steep slopes. Even in level areas, however, erosion and sedimentation hazards can be increased through development-related activities such as grading/excavating and removal of stabilizing structures and vegetation. Potential impacts related to erosion and sedimentation from implementation of the SYCP would be avoided or reduced below a level of significance through mandatory conformance with applicable regulatory/industry standards and codes, including applicable requirements under the City Storm Water Program and the National Pollutant Discharge Elimination System (NPDES). The SYCP Final PEIR identifies erosion and sedimentation impacts as less than significant.

The SYCP Final PEIR identifies that potential geologic stability impacts associated with subsidence, collapse, expansive soils, and shallow groundwater would be avoided or reduced below a level of significance through mandatory conformance with applicable regulatory/industry standards and codes, including the International Building Code/California Building Code and pertinent City criteria.

## **PROPOSED PROJECT**

A Geotechnical Investigation Report Update was prepared for the project (Allied Earth Technology, June 1, 2015). A Geologic Reconnaissance was also prepared for the site (Michael W. Hart, March 19, 2014, revised June 4, 2015). The project site is designated as Category 53: *Level or sloping terrain, unfavorable geologic structure, and low to moderate risk* by the City of San Diego Seismic Safety Study Geologic Hazards and Faults. The potential geologic impacts associated with the proposed project, as identified by the project geotechnical investigation and geologic reconnaissance, are summarized below.

- <u>Surface/Fault Rupture</u>. No known active, potentially active, or inactive faults are located on the site. The potential for ground rupture is considered to be very low due to the absence of active faults at the project site. According to the Geologic Reconnaissance, the project site is not underlain by a fault, nor is it traversed by topographic or vegetation lineaments that might suggest the presence of previously unknown or unmapped active or potentially active faults. The project site is also not identified for ground rupture hazards in the City's Seismic Safety Study. Thus, there is no potential for rupture of a known earthquake fault at the site.
- <u>Ground Shaking</u>. Major seismic events on local and regional active faults could subject the project site to moderate to severe ground shaking. Local, active faults in the project vicinity include the Rose Canyon fault, located approximately 6 miles to the northwest. The nearest major regional fault system is the Coronado Bank Fault, located approximately 14 miles to the west of the project site. Other active faults, including the Elsinore, San Jacinto, and San Andreas Faults are located as distances of 40, 60, and 90 miles, respectively, from the project site. The proposed residential uses would be constructed in accordance with industry standards and the California Building Code (CBC) requirements. The CBC seismic standards are designed to mitigate the potential for people or structures to be exposed to substantial risks from seismically-induced ground shaking. Compliance with the CBC requirements during construction of the project would limit the risk of damage or injury due to seismic ground shaking.
- Liquefaction/Settlement. The project site is not classified with a Geologic Hazard Category that indicates liquefaction potential (Hazard Categories 31 and 32 indicate liquefaction potential) by the City's Safety Seismic Study. The Geologic Reconnaissance identifies a low potential for liquefaction and seismically-induced settlement. With implementation of proper engineering design, adherence to industry standards, and compliance with the CBC, the project would not be susceptible to impacts associated with unstable soil or result in potential landslide, lateral spreading, subsidence, liquefaction, or collapse.

- <u>Seiches and Tsunamis</u>. As described for the SYCP above, the SYCP area, including the project site, is not located within an area subject to tsunamis or seiches.
- Landslides/Slope stability. The California Division of Mines and Geology publication Landslide Hazards in the Southern Part of the San Diego Metropolitan Area indicates that the site is defined as being generally susceptible to landsliding with slopes that are at or near their stability limits due to a combination of weak materials and steep slopes. The Geologic Reconnaissance determined that the geologic structure in the area of the project site is not adverse in terms of slope stability. The sediments underlying the elevated areas of the project site consist of well-cemented sandstone and conglomerate, with a low potential for a landslide hazard. The project site is surrounded by developed uses, and would not be subject to impacts from landslides on adjacent properties. The project site itself contains steep topography (10 to 20 percent; SB&O, Inc., October 16, 2014) and the Smythe Avenue property frontage consists of a large, steep cut slope (1.5:1 slope, up to 45 feet in height). The project site would be graded and would include two large retaining walls up to 26 feet in height. The project would be required to utilize proper engineering design and adhere to industry standards, as well as compliance with the CBC. Compliance with these standards during construction of the project would limit the risk of damage or injury due to landslides.
- <u>Erosion</u>. The project includes a landscape plan that has been reviewed and approved by City staff that precludes erosion of topsoil. Standard construction Best Management Practices (BMPs) would be implemented to ensure that the project would not result in a substantial amount of topsoil erosion.
- <u>Expansive Soils</u>. According to the United States Soil Survey, soils on the project site include Olivenhain cobbly loam and Huerhuero-Urban land complex, which have high and moderate shrink-swell behavior, respectively. With implementation of proper engineering design, adherence to industry standards, and compliance with the CBC, the project would not create substantial risks to life or property due to expansive soils.

In conclusion, the SYCP Final PEIR calls out a significant impact associated with landslides that is reduced to a less than significant level through implementation of Mitigation Framework Measure GEO-1. Mitigation Framework Measure GEO-1 is not applicable to the project, as the project is not located within geologic hazards category 21 or 22. All other geology impacts in the SYCP Final PEIR are identified as less than significant based on conformance with applicable regulatory/industry and code standards related to geologic hazards, including pertinent elements of the Seismic Hazards Mapping Act, Alquist-Priolo Earthquake Fault Zoning Act, California Building Code, and related City standards. Implementation of appropriate measures in conformance with applicable regulatory/ industry standards would be mandated through required efforts including completion of appropriate site-specific geotechnical investigations. Based on the project-specific geotechnical investigation and geologic reconnaissance, the geotechnical consultants concluded that geologic hazards and impacts of the project would be less than significant, provided that the recommendations within the report are implemented.

The City's Geology Section has reviewed the referenced reports and concluded that the investigations conducted adequately addressed the geologic conditions potentially affecting the project site. Proper engineering design and utilization of standard construction practices, to be verified at the building permit stage, would ensure that the potential for impacts from regional geologic hazards would be less than significant and no mitigation measures are deemed necessary. Therefore, based on the results of the geotechnical investigation of the site, and provided that the

earthwork and grading recommendations are implemented in accordance with the City Grading Ordinance requirements, the project's impacts would be consistent with those identified in the SYCP Final PEIR and no new impact would occur.

## Paleontological Resources

## FINAL PEIR

According to the SYCP Final PEIR, the SYCP area is underlain by areas of high (Baypoint, San Diego, and Otay formations), moderate (Lindavista Formation), and low (alluvium/colluvium) paleontological sensitivity. The SYCP area also contains recent artificial fill and native topsoil, which exhibit no potential for the occurrence of sensitive paleontological resources. The SYCP Final PEIR found that significant impacts could result from future development activities associated with implementation of the SYCP, but would be mitigated through a project-level analysis of paleontological impacts and paleontological monitoring requirements during grading (SYCP Final PEIR Mitigation Framework Measure PALEO-1).

## **PROPOSED PROJECT**

The project site is underlain by the geologic Baypoint, Lindavista, and San Diego formations. The Baypoint and San Diego formations have high sensitivity for paleontological resources in all communities where they occur. The Lindavista Formation has a moderate potential for paleontological resources in the project area. Consistent with the City's CEQA Significance Determination Thresholds, if a project excavates over 1,000 CY at a depth of ten feet or greater in high sensitivity areas, the project would result in a significant impact on paleontological resources. The project proposes excavation of 67,890 CY at a maximum depth of 40 feet. Therefore, impacts to paleontological resources would be significant and mitigation would be required. The SYCP Final PEIR calls out a significant impact associated with paleontological resources that is reduced to a less than significant level through implementation of Mitigation Framework Measure PALEO-1. The project-level of analysis of potential impacts on paleontological resources required by SYCP Mitigation Framework Measure PALEO-1 is contained in this Addendum. Based on that analysis, a significant impact would occur, consistent with the significant impact identified in the SYCP Final PEIR. Mitigation monitoring would be required, also consistent with the requirements of the SYCP Final PEIR Mitigation Framework Measure PALEO-1. The requirements for monitoring are listed in Section V of this Addendum. Compliance with the monitoring mitigation would reduce significant impacts to paleontological resources to below a level of significance.

# V. MITIGATION, MONITORING AND REPORTING PROGRAM INCORPORATED INTO THE PROJECT:

The Pacifica Ridge project shall be required to comply with all mitigation measures outlined within the MMRP of the previously certified SYCP Final PEIR No. 310690, SCH No. 2015111012 and the project-specific subsequent technical studies required in accordance with the SYCP Final PEIR Mitigation Framework. The following MMRP identifies site-specific measures which specifically apply to this project.

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

- Prior to the issuance of a Notice To Proceed (NTP) for a subdivision, or any construction permits, such as Demolition, Grading or Building, or beginning any construction related activity on-site, the Development Services Department (DSD) Director's Environmental Designee (ED) shall review and approve all Construction Documents (CD), (plans, specification, details, etc.) to ensure the MMRP requirements are incorporated into the design.
- In addition, the ED shall verify that the MMRP Conditions/Notes that apply ONLY to the construction phases of this Project are included VERBATIM, under the heading, "ENVIRONMENTAL/MITIGATION REQUIREMENTS."
- 3. These notes must be shown within the first three (3) sheets of the construction documents in the format specified for engineering construction document templates as shown on the City website:

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

- 4. The **TITLE INDEX SHEET** must also show on which pages the "Environmental/Mitigation Requirements" notes are provided.
- 5. SURETY AND COST RECOVERY The Development Services Director or City Manager may require appropriate surety instruments or bonds from private Permit Holders to ensure the long term performance or implementation of required mitigation measures or programs. The City is authorized to recover its cost to offset the salary, overhead, and expenses for City personnel and programs to monitor qualifying projects.

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

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

## **Qualified Biologist**

Note: Failure of all responsible Permit Holder's representatives and consultants to attend shall require an additional meeting with all parties present.

## CONTACT INFORMATION:

- a) The PRIMARY POINT OF CONTACT is the **RE** at the **Field Engineering Division** 858-627-3200
- b) For Clarification of ENVIRONMENTAL REQUIREMENTS, applicant t is also required to call **RE and MMC at 858-627-3360**
- 2. MMRP COMPLIANCE: This Project, Project Tracking System (PTS) Number <u>393812</u> and /or Environmental Document Number <u>393812</u>, shall conform to the mitigation requirements contained in the associated Environmental Document and implemented to the satisfaction of the DSD's Environmental Designee (MMC) and the City Engineer (RE). The requirements may not be reduced or changed but may be annotated (i.e. to explain when and how compliance is being met and location of verifying proof, etc.). Additional clarifying information may also be added to other relevant plan sheets and/or specifications as appropriate (i.e., specific locations, times of monitoring, methodology, etc.)

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

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

#### NOT APPLICABLE

#### 4. MONITORING EXHIBITS

All consultants are required to submit, to RE and MMC, a monitoring exhibit on a 11x17 reduction of the appropriate construction plan, such as site plan, grading, landscape, etc., marked to clearly show the specific areas including the **LIMIT OF WORK**, scope of that discipline's work, and notes indicating when in the construction schedule that work will be performed. When necessary for clarification, a detailed methodology of how the work will be performed shall be included.

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

## 5. OTHER SUBMITTALS AND INSPECTIONS:

The Permit Holder/Owner's representative shall submit all required documentation, verification letters, and requests for all associated inspections to the RE and MMC for approval per the following schedule:

#### **Document Submittal/Inspection Checklist**

Issue Area	Document submittal	Assoc Inspection/Approvals/Notes
General	Consultant Qualification Letters	Prior to Pre-construction Meeting
General	Consultant Const. Monitoring Exhibits	Prior to or at the Pre-Construction
		meeting
Biology	Biology Reports	Biology site observations
Paleontology	Monitoring Reports	Paleontological site observations
Bond Release	Request for Bond Release letter	Final MMRP inspections prior to Bond
		Release Letter

## C. SPECIFIC MMRP ISSUE AREA CONDITIONS/REQUIREMENTS

#### **BIOLOGICAL RESOURCES**

## Bio – 1 Biological Resource Protection During Construction Including General Avian Protection

## I. Prior to Construction

- A. Biologist Verification: The owner/permittee shall provide a letter to the City's Mitigation Monitoring Coordination section stating that a Project Biologist (Qualified Biologist), as defined in the City of San Diego's Biological Guidelines (2012), has been retained to implement the project's biological monitoring program. The letter shall include the names and contact information of all persons involved in the biological monitoring of the project.
- **B. Pre-construction Meeting:** The Qualified Biologist shall attend a preconstruction meeting, discuss the project's biological monitoring program, and arrange to perform any follow up mitigation measures and reporting including site-specific monitoring, restoration or revegetation, and additional fauna/flora surveys/salvage.
- **C. Biological Documents:** The Qualified Biologist shall submit all required documentation to Mitigation Monitoring Coordination verifying that any special mitigation reports including but not limited to, maps, plans, surveys,

survey timelines, or buffers are completed or scheduled per City Biology Guidelines, MSCP, ESL Ordinance, project permit conditions; CEQA; endangered species acts; and/or other local, State or federal requirements.

- D. Biological Construction Mitigation/Monitoring Exhibit: The Qualified Biologist shall present a Biological Construction Mitigation/Monitoring Exhibit which includes the biological documents in C, above. In addition, include: restoration/revegetation plans, plant salvage/relocation requirements, avian or other wildlife surveys/survey schedules (including general avian nesting and USFWS protocol), timing of surveys, wetland buffers, avian construction avoidance areas/noise buffers/ barriers, other impact avoidance areas, and any subsequent requirements determined by the Qualified Biologist and the City Assistant Deputy Director/Mitigation Monitoring Coordination. The Biological Construction Mitigation/Monitoring Exhibit shall include a site plan, written and graphic depiction of the project's biological mitigation/ monitoring program, and a schedule. The Biological Construction Mitigation/Monitoring Exhibit shall be approved by Mitigation Monitoring Coordination and referenced in the construction documents.
- Avian Protection Requirements: To avoid any direct impacts to raptors Ε. and/or any native/migratory birds, removal of habitat that supports active nests in the proposed area of disturbance should occur outside of the breeding season for these species (February 1 to September 15). If removal of habitat in the proposed area of disturbance must occur during the breeding season, the Qualified Biologist shall conduct a pre-construction survey to determine the presence or absence of nesting birds on the proposed area of disturbance. The pre-construction survey shall be conducted within 10 calendar days prior to the start of construction activities (including removal of vegetation). The Applicant shall submit the results of the pre-construction survey to City Development Services Department for review and approval prior to initiating any construction activities. If nesting birds are detected, a letter report or mitigation plan in conformance with the City's Biology Guidelines and applicable State and federal law (i.e., appropriate follow up surveys, monitoring schedules, construction and noise barriers/buffers, etc.) shall be prepared and include proposed measures to be implemented to ensure that take of birds or eggs or disturbance of breeding activities is avoided. The report or mitigation plan shall be submitted to the City Development Services Department for review and approval and implemented to the satisfaction of the City. The City's Mitigation Monitoring Coordination Section or Resident Engineer, and Qualified Biologist shall verify and approve that all measures identified in the report or mitigation plan are in place prior to and/or during construction. If nesting birds are not detected during the pre-construction survey, no further mitigation is required.
- **F. Resource Delineation:** Prior to construction activities including the erection of any permanent fencing, the Qualified Biologist shall supervise the

placement of silt and orange construction fencing or equivalent along the limits of disturbance and verify compliance with any other project conditions as shown on the Biological Construction Mitigation/Monitoring Exhibit. This phase shall include flagging plant specimens and delimiting buffers to protect sensitive biological resources (e.g., habitats/flora and fauna species, including nesting birds) during construction. Appropriate steps/care should be taken to minimize attraction of nest predators to the site.

G. Education: Prior to commencement of construction activities, the Qualified Biologist shall meet with the owner/permittee or designee and the construction crew and conduct an on-site educational session regarding the need to avoid impacts outside of the approved construction area and to protect sensitive flora and fauna (e.g., explain the avian and wetland buffers, flag system for removal of invasive species or retention of sensitive plants, and clarify acceptable access routes/methods and staging areas, etc.).

## II. During Construction

A. Monitoring: All construction (including access/staging areas) shall be restricted to areas previously identified, proposed for development/staging, or previously disturbed as shown on "Exhibit A" and/or the Biological Construction Mitigation/Monitoring Exhibit. The Qualified Biologist shall monitor construction activities as needed to ensure that construction activities do not encroach into biologically sensitive areas, or cause other similar damage, and that the work plan has been amended to accommodate any sensitive species located during the pre-construction surveys. In addition, the Qualified Biologist shall document field activity via the Consultant Site Visit Record. The Consultant Site Visit Record shall be e-mailed to Mitigation Monitoring Coordination on the 1<sup>st</sup> day of monitoring, the 1<sup>st</sup> week of each month, the last day of monitoring, and immediately in the case of any undocumented condition or discovery.

The Qualified Biologist shall monitor, as is feasible, for the presence of sensitive animal species and shall, if practicable, direct or move these animals out of harm's way (i.e., to a location of suitable habitat outside the impact footprint).

**B. Subsequent Resource Identification:** The Qualified Biologist shall note/act to prevent any new disturbances to habitat, flora, and/or fauna on site (e.g., flag plant specimens for avoidance during access, etc.). If active nests or other previously unknown sensitive resources are detected, all project activities that directly impact the resource shall be delayed until species specific local, State or federal regulations have been determined and applied by the Qualified Biologist.

### III. Post Construction

A. In the event that impacts exceed previously allowed amounts, additional impacts shall be mitigated in accordance with City Biology Guidelines, ESL Ordinance and MSCP, CEQA, and other applicable local, State and federal laws. The Qualified Biologist shall submit a final Biological Construction Mitigation/Monitoring Exhibit/report to the satisfaction of the City Assistant Deputy Director/Mitigation Monitoring Coordinator within 30 days of construction completion.

## Bio – 2 Upland Vegetation Communities

Prior to issuance of a (Notice to Proceed) for a subdivision, or any construction permits, such as Demolition, Grading, or Building, or beginning any construction activity on the site, mitigation for project impacts to Tier I maritime succulent scrub shall be accomplished through the purchase and conservation of 1.98 acres of Tier I native grassland contiguous with Mission Trails Regional Park. Because the affected maritime succulent scrub exists outside of the MHPA while the proposed mitigation land exists inside of the MHPA, mitigation would be provided at a ratio of 1:1 of mitigation area to impact area. Prior, a Covenant of Easement shall be recorded over 1.98 acres of Tier I habitat in favor of the City and Wildlife Agencies.

## Bio – 3 Special-Status Avian Species

To the extent possible, project construction activities would avoid the bird breeding season (February 1 through September 15). However, if vegetation clearing must occur during the bird breeding season, a qualified biologist survey shall be conducted for the presence of nesting coastal California gnatcatcher and coastal cactus wren individuals within the project site and its vicinity no more than 72 hours prior to vegetation clearing. If clearing does not occur within 72 hours of the nesting bird survey, then the area should be resurveyed. If nesting coastal California gnatcatcher or coastal cactus wren individuals are identified, then the qualified biologist shall establish an adequate buffer zone in which construction activities are prohibited until the nest is no longer active.

## Bio-4 Special-Status Plant Species

Because the project site is outside of the MHPA, impacts to San Diego barrel cactus, San Diego bur-sage, and golden-spined cereus would be mitigated through habitat-based mitigation at the proposed mitigation site, in accordance with mitigation measure Bio-2.

## Paleontological Resources

- I. Prior to Permit Issuance or Bid Opening/Bid Award
  - A. Entitlements Plan Check
    - 1. Prior to permit issuance or Bid Opening/Bid Award, whichever is applicable, the Assistant Deputy Director (ADD) Environmental designee shall verify that the requirements for Paleontological Monitoring have

been noted on the appropriate construction documents.

## B. Letters of Qualification have been submitted to ADD

- 1. Prior to Bid Award, the applicant shall submit a letter of verification to Mitigation Monitoring Coordination (MMC).
- 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

- 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

- 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. Acknowledgement of Responsibility for Curation (CIP or Other Public Projects)

The applicant shall submit a letter to MMC acknowledging their responsibility for the cost of curation associated with all phases of the paleontological monitoring program.

- 3. Identify Areas to be Monitored
  - a. Prior to the start of any work that requires monitoring, the PI shall submit a Paleontological Monitoring Exhibit (PME) based on the appropriate construction documents (reduced to 11x17) to MMC for approval identifying the areas to be monitored including the delineation of grading/excavation limits. Monitoring shall begin at depths below 10 feet from existing grade or as detem1ined by the PI in consultation with MMC. The determination shall be based on site specific records search data which supports monitoring at depths less than ten feet.
  - b. 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).
  - c. MMC shall notify the PI that the PME has been approved.
- 4. 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.
- 5. Approval of PME and Construction Schedule

After approval of the PME by MMC, the PI shall submit to MMC written authorization of the PME and Construction Schedule from the CM.

## 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 including, but not limited to

mainline, laterals, jacking and receiving pits, services and all other appurtenances associated with underground utilities as identified on the PME that could result in impacts to formations with high and/or moderate resource sensitivity. **The Construction Manager is responsible for notifying the RE, PI, and MMC of changes to any construction activities such as in the case of a potential safety concern within the area being monitored. In certain circumstances OSHA safety requirements may necessitate modification of the PME.** 

- 2. The PI may submit a detailed letter to 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.
- 3. The monitor shall document field activity via the Consultant Site Visit Record (CSVR). The CSVR'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.

#### **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 inm1ediately 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 of the program from MMC, MC and/or RE. PRP and any mitigation must be approved

by MMC, RE and/or CM before ground disturbing activities in the area of discovery will be allowed to resume.

(1). Note: For pipeline trenching projects only, the PI shall implement the Discovery Process for Pipeline Trenching projects identified below under "D."

- 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.

(1). Note: For Pipeline Trenching Projects Only. If the fossil discovery is limited in size, both in length and depth; the information value is limited and there are no unique fossil features associated with the discovery area, then the discovery should be considered not significant.

(2). Note, for Pipeline Trenching Projects Only: If significance cannot be determined, the Final Monitoring Report and Site Record shall identify the discovery as Potentially Significant.

## D. Discovery Process for Significant Resources - Pipeline Trenching Projects

The following procedure constitutes adequate mitigation of a significant discovery encountered during pipeline trenching activities including but not limited to excavation for jacking pits, receiving pits, laterals, and manholes to reduce impacts to below a level of significance.

- 1. Procedures for documentation, curation and reporting
  - a. One hundred percent of the fossil resources within the trench alignment and width shall be documented in-situ photographically, drawn in plan view (trench and profiles of side walls), recovered from the trench and photographed after cleaning, then analyzed and curated consistent with Society of Invertebrate Paleontology Standards. The remainder of the deposit within the limits of excavation (trench walls) shall be left intact and so documented.
  - b. The PI shall prepare a Draft Monitoring Report and submit to MMC via the RE as indicated in Section VI-A.

- c. The PI shall be responsible for recording (on the appropriate forms for the San Diego Natural History Museum) the resource(s) encountered during the Paleontological Monitoring Program in accordance with the City's Paleontological Guidelines. The forms shall be submitted to the San Diego Natural History Museum and included in the Final Monitoring Report.
- d. The Final Monitoring Report shall include a recommendation for monitoring of any future work in the vicinity of the resource.

#### IV. Night and/or Weekend Work

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

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

b. Discoveries

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

c. Potentially Significant Discoveries

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

- d. The PI shall immediately contact the RE and MMC, or by 8AM on the next business day to report and discuss the findings as indicated in Section III-B, unless other specific arrangements have been made.
- B. If night and/or weekend work becomes necessary during the course of construction
  - 1. The Construction Manager shall notify the RE, or BI, as appropriate, a minimum of 24 hours before the work is to begin.
  - 2. The RE, or BI, as appropriate, shall notify MMC immediately.

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

## V. Post Construction

- A. Preparation and Submittal of Draft Monitoring Report
  - 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 via the RE for review and approval within 90 days following the completion of monitoring.
    - For significant paleontological resources encountered during monitoring, the Paleontological Recovery Program or Pipeline Trenching Discovery Process shall be included in the Draft Monit01ing 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 via the RE for revision or, for preparation of the Final Report.
- 3. The PI shall submit revised Draft Monitoring Report to MMC via the RE 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.
- C. Curation of artifacts: 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.

no case issue the Natice of Completion up

1. The PI shall submit two copies of the Final Monitoring Report to MMC (even if negative), within 90 days after notification from MMC of the approved report.

2. The PI shall submit the Deed of Gift and catalogue record(s) to the RE or BI, as appropriate for donor signature with a copy submitted to MMC.

3. The RE or BI, as appropriate shall obtain signature on the Deed of Gift and

4. The PI shall include the Acceptance Verification from the curation institution in the Final Monitoring Report submitted to the RE or BI and MMC.

shall return to PI with copy submitted to MMC.

2. The RE shall, in no case, issue the Notice of Completion until receiving a copy of the approved Final Monitoring Repo1t from MMC which includes the Acceptance Verification from the curation institution.

The above Mitigation Monitoring and Reporting program will require additional fees and/or deposits to be collected prior to the issuance of building permits, certificates or occupancy and/or final maps to ensure the successful completion of the monitoring program.

## VI. SIGNIFICANT UNMITIGATED IMPACTS:

D. Final Monitoring Report(s)

There are no new significant impacts identified for the current project. However, the SYCP Final PEIR identified significant unmitigated impacts relating to cumulative transportation/ circulation, air quality, and historical resources. Because there were significant unmitigated impacts associated with the SYCP approval that required the decisionmaker to make specific and substantiated CEQA Findings which stated that: a) specific economic, social or other considerations make infeasible the mitigation measures or project alternatives identified in the Final PEIR; and b) these impacts have been found acceptable because of specific overriding considerations, no new CEQA Findings are required with this project.

Anna L. McPherson

Anna L. McPherson AICP Senior Planner Development Services Department

Analyst: McPherson

Attachments:

September 17, 2018

Date of Final Report

Figure 1: Project Location Figure 2: Project Site Aerial Figure 3: Site Plan

## **REFERENCES:**

Copies of the addendum, the Final PEIR, the MMRP, and any technical appendices may be reviewed in the office of the Land Development Review Division of the Development Services Department, or purchased for the cost of reproduction.

Airport Land Use Commission

- 2015 Naval Outlying Landing Field Imperial Beach. Adopted October 15.
- 2010 Brown Field Airport Land Use Compatibility Plan. Amended December 20.

Allied Earth Technology Affiliates

2015 Update of Geotechnical Investigation Report Proposed Townhome Building Site, East Side of Smythe Avenue, North of W. Foothill Road, San Ysidro Area, San Diego, California. June 1.

**Baranek Consulting Group** 

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